

Mr Adrian Duffield South Oxfordshire District Council 135 Eastern Avenue Milton Park Milton OX14 4SB

29th September 2019

Dear Mr Duffield,

I write in reference to the recent letter from Homes England sent to you on 23rd September, and included in the briefing pack for the Council's Scrutiny Committee as Appendix 19.

There have been many views as to the viability of including Chalgrove Airfield in the Local Plan, and as you are well aware, our view differs significantly to that of Homes England. Under normal circumstances, we would simply attend the various Council meetings and use our three minutes to put our case across. However, this extraordinary letter from Homes England demands a formal response which will allow us to counter some of the more fanciful claims made.

Firstly, in regard to the content of the letter itself, Homes England states that the investment addresses long standing highways issues in the villages of Watlington, Stadhampton, Chiselhampton and Cuxham. It makes no mention of Little Milton or Benson, which will be significantly affected.

Homes England has made the statement that they are able to start delivering homes within the first five years of the Local Plan. This statement of course ignores that fact that the only way that delivery can commence would be following a successful Compulsory Purchase of the protected lease enjoyed by the current tenant, Martin-Baker Aircraft Company Limited (MBACL)

The statement that Chalgrove is sustainable bears close examination. Unless the plan has changed significantly from the one submitted to the Local Plan, the idea that this development will reduce the need to travel is unproven, and fanciful. It relies on a belief that residents will live and work within the development, and not travel further afield. The location of the site, well away from other centres of employment, retail, entertainment etc. will definitely increase the need to travel significantly, and the local bus provider has also objected on the grounds that the route will be unsustainable once the initial "pump priming" money is withdrawn. The idea that a conurbation of almost 4500 houses (when the existing village is included) will not increase traffic defies rational belief.

With regard to suitability, Chalgrove is neither brownfield (as active airfields cannot be defined as brownfield), nor is it "underused", being the testing facility for a thriving and active business and the land between the runways being used for grazing. The statement that It will benefit the existing communities through the provision of "new essential services" overlooks the fact that no provision whatsoever has been made in regards to Police, Fire or Ambulance services, all of whom would need to access this site via a single B-road. There are no other essential services that the existing communities are lacking.

The conceit that this will provide a net gain in biodiversity would only hold true if this were to include domestic dogs and cats. The site is currently a green space, mostly grazed by sheep, and used for haymaking. The increase in street lighting alone will have a detrimental effect on biodiversity, including the many species of bats. Native deer, Muntjac deer, rabbits and hares will lose their grazing areas; mice, voles, hedgehogs and invertebrates will lose their foraging areas, and owls, buzzards, kestrels and kites will lose hunting grounds.

The suggestion that cycle routes and bus connections will be improved beyond the development is simply false. There have been no plans whatsoever put out for consultation that include any cycle routes beyond the development. There have already been a number of accidents and deaths of cyclists on the narrow roads around Chalgrove, and along the B480. Bus routes are limited to Oxford, and potentially Abingdon and Didcot, which do not help anyone who works beyond those areas. As stated above, even the Oxford route will be unviable once the initial funding is withdrawn.

The availability of Chalgrove is a highly contentious proposal. The view of Homes England that Martin-Baker can be accommodated within the development is absolutely refuted by Martin-Baker themselves. MBACL have provided detailed documentary evidence as to why this is the case, and have not had any of their concerns addressed. Homes England may be confident that there is no impediment, but surely the refutation of this by the company involved must carry more weight?

Homes England continues to misrepresent the situation between them and MBACL, by insisting that they want to negotiate MBACL has stated clearly that negotiations ceased almost two years ago, so it is not credible that negotiation is an option. The CPO referred to would need to meet strict criteria, including demonstrating public interest and necessity. While other sites remain in the Local Plan, necessity cannot be demonstrated. Regardless, MBACL have stated repeatedly that moving is not an option for them. I note that the only work that has been done by the panel of taxpayer-funded consultants is in regard to the runway itself; no mention is made of the explosives testing facility that will be adjacent to housing.

The purchase of additional land cannot be considered relevant. This is Greenfield land, and does not form any part of the proposal that is included in the Local Plan.

Deliverability is highly contentious. In order to meet deliverability criteria, the site must be capable of delivering housing – not just infrastructure, but housing – within the first five

years. While the outcome of a CPO is pending, Homes England cannot make this assertion.

With regard to the AECOM report, there are a number of elements that bear greater scrutiny.

1.3.2 – MBACLs assessment is based on earlier versions...which have since been subject to a number of design revisions. None of the publicly available design revisions bear any significant changes in regards to the MBACL site, unless there are revisions that have not yet been released to the public. Regardless, the MBACL assessment was based on the Masterplan submitted to SODC for inclusion in the Local Plan; if this has changed materially then it would require additional consultation.

1.3.3 Whilst the proposal is to build the areas to the north of the development last, it does not address the issues of noise for those residents.

1.4.5 None of the consultants listed is an expert in the field of military aircraft dispositions on a global scale. MBACL supports many air forces around the world, and it is facile to suggest that every single country and air force that MBACL supports will all change their mode of operation within the same time period. The statement regarding the MBACL business plan ignores the confidential nature of large parts of their business, which would make the publication of a business plan of this nature undesirable.

1.4.6 The aircraft that MBACL use have been selected for very precise characteristics, and are maintained by MBACL. The "pragmatic" solutions alluded to ignore the confidential nature of many of the customers of MBACL, which would be compromised by this development.

1.4.7 The homes at Marley Lane are irrelevant to this proposal. The homes are contiguous with the existing village boundary, and are actually further away from the runway and the line of the runway than the existing houses on the northern boundary of the village. The implication is that they are closer than other housing, which is simply false. This paragraph should be disregarded.

Part 2 The Ability to Accommodate a CAA Compliant Runway within the Safeguarded Land - The positon of the new runway is relevant to this section. The Masterplan places buildings directly at the end of the runway, with no additional safety margins.

Part 3: The Ability to Accommodate the Existing and Future MBACL Operations on Site – this whole section fails to address two major issues. One is the explosives testing facility on the MBACL site, which is extremely noisy. The other is the potential expansion of MBACL business on the site. Homes England have stated that they have additional land available, one part of which is Historic Battlefield, and the other would be on the opposite side of any new runway.

Part 4: The Opportunity for MBACL Activities to be Undertaken Elsewhere – 1.4.16 suggests that MBACL could move to France. This would result in the loss of 80 highly skilled technical jobs from Chalgrove, and requiring the sole supplier of ejection seats to the RAF to test those seats in another country. The suggestion that Homes England could utilise land it has

subsequently purchased outside of the original Masterplan would materially change their proposals, and would surely require additional planning permission for this Greenfield site. Regardless, the new land is outside of the proposal for the Local Plan, and would require separate consultation to be undertaken, as it is a significant departure from the original proposal. The suggestion that MBACL would relocate facilities from Denham to Chalgrove is pure speculation, and shows a complete disregard for their current business model and employees.

1.5.6 This statement is demonstrably false. The report takes no consideration of the explosives testing facility and the potential for noise complaints. It takes no consideration of the likelihood of noise complaints from new residents for the low level tests or the noise of the aircraft themselves. It further ignores the one true subject matter expert in this area – MBACL themselves.

I appreciate that Homes England have to make the best possible case for their proposals, and that this is a critical juncture in the decision making process. However, a high level report that includes no specific facts or figures, and confuses supposition with fact, should be treated with careful consideration, and I trust that you will treat it in this manner.

I would appreciate it if this letter could also be made available to Councillors in advance of the forthcoming Committee meetings.



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