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working locally and nationally to protect
and enhance a beautiful, thriving
countryside for everyone to value and
enjoy

20th August 2020

RE: P20/S2134/O

Chalgrove Airfield Chalgrove OX44 7RJ-
Outline Planning Application for Residential-led mixed use development comprising the following
elements with all Matters reserved, except Access, as shown on the Land Use and Access
Parameter Plan, Building Heights Parameter Plan

Dear Ms Smith

The committee of CPRE Oxfordshire South Oxfordshire District objects to this application on the
grounds of sustainability, impact on landscape and failing to meet SODC’s aim to be carbon
neutral by 2030.

The development of this site is contrary to the current Chalgrove Neighbourhood Development
Plan, and not in accordance with the current Local Plan. The site’s inclusion as a Strategic
Development site is uncertain. Therefore, this application should not be considered until after
the site’s inclusion in the emerging Local Plan is confirmed.

Throughout the supporting documentation, the applicant has stated Chalgrove is closer to
various transport hubs and town/city centres than it actually is. It would seem that the
applicant has used ‘as the crow flies’ distances rather than road distances to try to show that
Chalgrove is a sustainable location.

For example, Framework Travel Plan para 1.2.1

Distance to	AA route finder from Chalgrove Airport
Chalgrove to Oxford City Centre 15 km	21 km
Chalgrove to Abingdon 15 km	20 km
Chalgrove to Aylesbury 25 km	via A329/A418 33.4 km

The applicant has failed to prove that this site is sustainable. With particular reference to
Sustainable Transport it fails to meet the requirements of NPPF para103. The applicant
recognises that “Chalgrove is mid-way between two major transport routes - the M40 (to the
east) and the A34 (to the west) but it is connected to both by relatively minor roads (and both
are about 30 minutes’ travel time)”¹ and through its Transport Assessment para 3.12.11
recognises that public transport accessibility is currently limited. We argue that public transport
will remain limited. This proposal does not offer a genuine choice of transport modes for a
development based on housing for commuters with the bus being the only commuting public-
transport option accessible without a car. The Transport Assessment para 4.1.1 says it all, this
is a housing-led development. If the developer was truly committed to sustainability the
proposal would put public transport at the heart of the proposal, as recommended by Bus

¹ 1.5 [CA31 Economic Strategy](#)

Service & New Residential Developments - Stagecoach 2017² and Three Stages to Better Bus Services - Campaign for Better Transport 2018³ The applicant mentions throughout the supporting documents that this site is to provide houses for commuters to employment sites outside Chalgrove and South Oxfordshire, with the only feasible public transport options being enhancement of the current service (Watlington to Oxford), and introduction of a new bus service, Chalgrove to Abingdon, which is subject to a route change once/if the Culham bridge is built. The report from the Foundation for Integrated Transport on the rural bus service in Shropshire⁴ sets out a number of ambitions that might make a useful starting point for Chalgrove eg:

- Every train station in the county to be served by buses that meet selected trains and provide connections to the nearest main settlement and to smaller villages and communities within a 10 mile radius, defined by town and parish councils.
- Every settlement with a population of above an agreed threshold (e.g. 600) to have a bus service to link that settlement with its nearest train station and to a defined hub that would facilitate transfers from bus to bus in addition to bus to train
- All bus services to be 7 days a week including train-bus connections and on weekdays the bus services would offer a 1 hour frequency

It is not clear when these new and enhanced services will commence. As recommended by the publications referred to above, the services should be in place with the occupancy of the first house. The Framework Travel Plan 5.4.12 states that it will “Ensure that each new resident has access to “Welcome Pack” information on sustainable travel opportunities from their first day of occupation.” Therefore, the bus services must be in place before occupancy of the first house.

The Transport Assessment para 4.5.6 makes it clear that it sees the bus route as being needed to provide a viable commuting and leisure service to Oxford. The applicant in its proposals for new bus services should also consider the importance of the bus service in bringing workers in to the current/future employment sites in Chalgrove and Watlington, including workers to Watlington Hospital & future care home. This importance is clearly shown in the CA.31 Economic Strategy⁵ which shows that the majority of employment jobs in Chalgrove⁶ are taken by workers from outside Chalgrove (78% fig A-2) with the majority of working Chalgrove residents work outside Chalgrove (89%, fig A-2). It is fanciful to think that this pattern will change with the creation of 1,300 new jobs (table 3.2) (not including those created with the planned expansion of the Monument Park Industrial Estate) and 3,000 houses with a working population of between 4,000 and 5,000. Indeed, with better transport links the likelihood is that commuting to Oxford, the Science Vale or London will become more attractive. Reinforcing our view that this will become a dormitory town with a car-based economy. The applicant also does not consider how these routes support Transport to Schools both to local state schools, and private schools & further education colleges further afield. The current & proposed bus route does not serve the current & future employment site of Monument Park. Since the applicant owns the whole site, it should consider providing a route (possibly a bus gate & multi-user paths) linking up with Sir James Martin Way and Monument Road.

The applicant also fails to mention the use of the current bus service to bring workers to the construction site in support of reducing worker travel (para 9.5.16).

² <https://www.stagecoachgroup.com/~media/Files/S/Stagecoach-Group/Attachments/pdf/bus-services-and-new-residential-dev.pdf>

³ <https://bettertransport.org.uk/sites/default/files/pdfs/bus-services-act-guidance.pdf>

⁴ <http://integratedtransport.co.uk/wp-content/uploads/2019/03/FIT-Shropshire-Buses-Report-web.pdf>

⁵ [CA31 Economic Strategy](#)

⁶ Chalgrove MSOA includes neighbouring areas (Chiselhampton, Drayton Saint Leonard, Dorchester on Thames, Chillingord and Berrick Salome)

The applicant has provided erroneous information about distances to rail stations, none of which are served by current or proposed bus services and cannot be considered nearby for meaningful daily commuting.

Transport Assessment 3.11.8 & 3.12.11

Distance to Stations	AA route finder from Chalgrove Airport
Chalgrove to Culham 10 km	15.2 km
Chalgrove to Oxford 15 km	21.5 km
Chalgrove to Didcot 13km	via B480 21.5 km
Chalgrove to Had'ham/Thame 14km	via A329 22.8 km

Transport Assessment para 3.11.5 & 3.12.11 even mentions the Oxford Tube service where coaches between Oxford & London can be caught at Lewknor/Junction 6 of M40, but this is not something supported by the OCC transport plan, and this service has arisen by circumstance of motorway junction layout, not of desire by the county to promote this as a transport hub, and car parking problems cause nothing but misery to residents of Lewknor.

Cycling to & from Chalgrove for commuting purposes to other employment centres is unlikely; the Transport Assessment para 3.12.10 states there is no formal cycle infrastructure in the vicinity of the site, and the mitigation proposals rely on other strategic developments coming forward and para 8.3.11 states they will provide a viable commuting and leisure service to Oxford. The applicant does not supply any supporting evidence and we doubt this claim; it is unlikely because the cycle routes are not direct, following narrow rural roads which will probably not be maintained to a high level, nor salt-treated through winter. CPRE believes that most cyclists seen in rural areas are recreational cyclists, cycling outside commuting times.

This application is contrary to NPPF para 102(c) & 104(d). As stated by the submission of our Rights of Way convenor the applicant has failed to look at enhancing connectivity by reinstating the former public rights of way and linking them though land the applicant also owns to the north of the site and upgrading the status of these paths to bridleway/restricted by-way allowing greater access & integration between nearby settlements and the new settlement & employment areas. Please note that the Transport Assessment para 3.9.5 wrongly attributes the PRoW colours. It should say Bridleways are marked in green & Footpaths in purple. Despite showing an illustration of horse riders in Highways England presentation material no specific mention of horse riding is made. Horse riders are considered Active Travel & their needs should be included as stated by Robert Courts MP -9 July 2019⁷. Furthermore, the applicant could consider using the land it owns to the north of the site to provide habitats for the red kites & flocks of wintering birds that it states will be lost⁸.

Transport Assessment Para 3.11.1 states that The Chartered Institute of Highways and Transportation (CIHT) guidance 'Guidelines for Planning for Public Transport in Developments' states that, for new developments, 'the maximum walking distance to a bus stop should not exceed 400m and preferably be no more than 300m', and Fig 4.3 shows the location of dwellings in relation to bus stops. Transport Assessment para 8.3.19 states it is reasonable to conclude that distance to a bus stop is unlikely to be a barrier to uptake. Unfortunately, the applicant has failed to acknowledge that when looking at the proposed routes for the buses through Chalgrove it is clear that many people will be much further than 300m and even 800m from stops served by a through service. Whilst cycle parking will be covered under reserved matters, Transport Assessment 4.7.1 indicates that cycle parking will only be provided in public areas and

⁷ <https://hansard.parliament.uk/Commons/2019-07-09/debates/C1FCA47F-DCB1-428B-9C9E-B3EF56A3E2F1/ActiveTravel>

⁸ Design & Access Statement part 5 page 2.

at local facilities. It is essential that cycle parking is provided at bus stops, failure to provide such parking would be contrary to NPPF para 104(d), Local Plan 2011 D2 and contrary to Transport Assessment para 8.3.19 which states it is reasonable to conclude that distance to a bus stop is unlikely to be a barrier to uptake.

One issue that public transport also suffers with is delays caused by congestion or parked cars. Transport Assessment para 4.3.4 states the “B480” road will be designed to accommodate free-flow of traffic, followed by para 4.3.5 which states that “Chalgrove High Street is narrow in places and vehicle flow is often impeded by parked cars, meaning that traffic flow is often stop-start. Based on these factors, the diverted route of the B480 through the development will remain a more attractive route for through traffic than Chalgrove High Street.” The impeded flow of traffic could result in an unreliable bus service.

Furthermore, we have concern over road details described in 4.3.4 Space will be provided in the carriageway to accommodate traffic turning right into side roads without impeding main road flow but does not address the issue of cars turning right into the Broadway. This problem brings frustration for residents of Thame who struggle to turn right out on to the ring-road from the Lea Park development.

The Framework Travel Plan states it will promote existing car share databases for use by residents, employers & school staff, but provides no supporting information as to whether such schemes work in developments of this size. What is available in the market towns of Wallingford / Thame / Henley? There appears to be little data to support the effectiveness of such schemes⁹. Indeed, such options can take passengers from public transport¹⁰ which would have an impact on the financial viability of the proposed bus services.

We believe the phasing of the plan does not promote sustainability from the outset. The phasing of the plan with the building of 500 homes before the construction of the centre & supermarket and complete realignment of the B480 to allow the development to be served by a bus service will only encourage new residents to make journeys by car to do their shopping & access leisure facilities. It may also cause problems for current services such as GP surgery & primary school. The Gypsy & Traveller pitch should also be brought forward to phase 1, as there is a shortage of such pitches leading to speculative development elsewhere within South Oxfordshire.

The applicant’s proposal to direct HGV construction traffic to use the B4009 route through Shirburn during the construction 2 phase (when construction traffic is at its greatest¹¹) has not considered the cumulative effects on Shirburn, through resident generated, construction-worker generated and some construction-vehicle generated traffic from developments in Benson, Chalgrove, Watlington & Chinnor which will be at a much greater level than it is currently. This proposal does not recognise that Shirburn is identified within the Oxfordshire Freight Strategy LTP 2015-2031¹² as an environmentally sensitive area to be avoided if at all possible. A financial contribution for public realm improvements is not sufficient to mitigate the damage the HGV construction traffic will do to the road, air & noise pollution and damage caused by vibration to Shirburn conservation area & registered garden & park¹³, it’s dwellings & it’s listed buildings &

⁹ Page 5 Ride Sharing

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/773676/passengerroa dtransport.pdf

¹⁰ <https://www.es.kearney.com/automotive/article/?a/the-demystification-of-car-sharing>

¹¹ Para 9.6.38 [Env Statement Ch 9 Traffic & Transport](#)

¹² Figure 2

https://mycouncil.oxfordshire.gov.uk/documents/s33708/Background%20CA_JUN2816R10%20Connecting%20Oxfordshire%20vol%205%20-%20Freight%20Strategy.pdf

¹³ Grade II Listed Park & Garden <https://historicengland.org.uk/listing/the-list/list-entry/1001105>

walls¹⁴ alongside the B4009. The public realm improvements for Little Milton will also be of little benefit as its Listed Buildings¹⁵ & residents too will suffer from an increase in construction traffic from developments at Chalgrove, Watlington, Cuxham, Berinsfield & Grenoble Road as traffic avoids congestion around the Oxford ring road.

Furthermore, whilst the applicant suggests a new 7.5t limit on the A329 (except access) between Stadhampton & M40 which will reflect a restriction that most roads radiating from Chalgrove are subject to, such restrictions are difficult to enforce and are frequently ignored. They will still be used by the increasing number of vehicles weighing more than this when accessing the current & proposed employment areas within Chalgrove. The use of 'B' roads by lorries is far more costly in both environmental & infrastructure terms¹⁶. The council should also note that the A329 is only an 'A' road in name only. It was upgraded from 'B' road status to 'A' road status in 1967 and it has never been improved from its former 'B' road condition and as a consequence use by HGVs is far more costly in both environmental & infrastructure terms. How will this development compensate the highways authority for the damage that will be caused by construction traffic?

We note that the Environmental Statement Chapter 13 Landscape & Visual makes reference to the Chilterns AONB Management Plan 2014-19. This plan has now been replaced by the Chilterns AONB Management Plan 2019-2024 which has been received by SODC but is yet to be agreed, but is likely to be agreed in the near future. Does this application meet the requirements of this updated management plan?

CPRE Oxfordshire campaigns for dark skies. Whilst we appreciate that light pollution will increase, and accept we note that CA.25 Environmental Statement - Chapter 13: Landscape and Visual states 13.6.65 "By utilising modern lighting technology within the Proposed Development, it is expected that light spillage and sky glow would be kept to a minimum." we request that SODC insist that light spillage and sky glow will be kept to a minimum and note that the Institute of Lighting Professionals has updated its guidance notes for the reduction of obtrusive light¹⁷. We also note para 13.6.64 states "... There are expected to be floodlights at the proposed sports pitches, although these would only be in occasional use." It is likely that lights will be used most nights as the sports pitches are for school & community use. A time limit must be put on them to reduce their impact on the night sky, nearby residents and the night sky.

Our last point concerns the issue of climate change. The Climate Change report¹⁸ identifies three major sources of Green House Gas emissions from the construction and operation of the development:

Source	tons CO2e
Emissions resulting from the construction materials	257,490 (table 15.12)
Operational emissions from energy use in buildings	230,900 (table 15.13)
Operational emissions from transport	1,021,260 (table 15.13)

¹⁴ Grade I Listed Shirburn Castle <https://historicengland.org.uk/listing/the-list/list-entry/1368852> includes boundary walls under Part 1 (5) Planning (Listed Buildings and Conservation Areas) Act 1990 Grade II Listed Lower Farmhouse & Shirburn Cottage <https://historicengland.org.uk/listing/the-list/list-entry/1368873> Grade II Listed Shirburn Lodge & Wall <https://historicengland.org.uk/listing/the-list/list-entry/1284192>

¹⁵ [Little Milton Listed Buildings](#)

¹⁶ Para 6

https://mycouncil.oxfordshire.gov.uk/documents/s33708/Background%20CA_JUN2816R10%20Connecting%20Oxfordshire%20vol%205%20-%20Freight%20Strategy.pdf

¹⁷ [ILP reduction-of-obtrusive-light-2020](#)

¹⁸ CA.27 Environmental Statement – Chapter 15: Climate Change Chalgrove Airfield

These are very substantial numbers, equalling 500 tons per household and should be compared, for example, with the average emissions per person in Oxfordshire of approximately 5 tons per annum. The 2008 Climate Change Act, as amended in 2019, enacts that the UK should be carbon zero by 2050. Further the 2018 IPCC report found that emissions should reduce by 50% by 2030 (compared with 2018) to keep global heating to below 1.5°C. Indeed, SODC plans for the District to be carbon neutral by 2030. It is therefore essential to reduce substantially the numbers in the table above. The mitigation measures in the Chalgrove Climate Change report are completely inadequate to achieve this. It is already possible, with existing technology, to build houses with zero or even negative emissions from their construction (negative emissions means the houses lock up carbon in their construction materials) and houses which have zero, or negative, operational emissions.

Mitigation of the transport emissions needs much more radical solutions - a 3 per hour bus service will not solve it. Homes England must address this as a matter of urgency.

Finally, please note that our submission is in respect of the proposed development. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions, and you should satisfy yourselves on any facts before reaching your decision.

Yours sincerely

The Committee of South Oxfordshire District of CPRE