

**BUCKINGHAMSHIRE & OXFORDSHIRE
CAMPAIGN AGAINST
AIRFIELD REDEVELOPMENT**

BOXCAAR

Submission to Public Inquiry at Appeal

1. INTRODUCTION TO BOXCAAR

BOXCAAR was formed at a public meeting held in Finmere on 13th November 2002, when it was requested to represent the interests of the members of those villages directly affected by these proposals. The meeting appointed a committee to canvass and represent their interests and to respond to the planning application and any appeal that might follow.

The BOXCAAR committee has met on a number of occasions and has researched the background to the application and the potential consequences of the development. This report forms the basis of BOXCAAR's objection to the Appeal.

2. INTRODUCTION TO SUBMISSION

2.1 This document represents a response to Harris Lamb's submission on behalf of Mainland Car Deliveries' Appeal against AVDC's Refusal for a car distribution site at Finmere Airfield.

2.2 The submission prepared by BOXCAAR at the planning application stands. This document updates and supplements it in advance of the Public Inquiry at Appeal.

2.3 The application is for

- 30 acres of open storage
- buildings
- hard surfacing
- lighting
- security fencing
- re-routing of a public footpath
- landscaping

2.4 The applicant seeks Change of Use: this is inaccurate. The proposal is clearly for development in the open countryside.

2.5 Other documents reply to other reports relating to specific areas:

- Planning
- Transport
- Landscape
- Ecology
- Lighting
- Drainage

- 2.6 The Appellant cites specific users: however the Appeal is open to any B8 open storage use. The economics of MCD's business have no meritorious contribution or special circumstance.
- 2.7 The Appellant stretches Government policy to untenable lengths to support their case. Whilst reduced vehicle mileage is admirable, it is not planned at the cost of open countryside. Such employment uses of land should be located in accordance with Plan policies in relevant zoned areas.
- 2.8 The weaknesses of site location choice are addressed in Section 4.
- 2.9 The Appellant asserts:
- the site is not brownfield
 - it has not previously been developed in terms of the Planning Act
 - it contributes to the open landscape nature of this high plateau
 - ecology issues are of concern
 - active airfield safety issues arise through certification
 - noise, contaminate and lighting pollution are not addressed.

3. THE SITE AND SURROUNDING AREA

- 3.1 The airfield remains operational for private operations. The owner of the airfield has applied to AVDC for an Airfield Certificate which in its own right attracts significant impact upon the surrounding area.
- 3.2 The contention that the site contains "landscaping belts" overstates the case. A couple of lines of thin poplars contribute little.
- 3.3 The existing Sunday Market does not impinge upon the application site and appears undisturbed, aside from some current parking area. There is no proposal to close it. Traffic impact is ignored.
- 3.4 The public footpath follows a natural A-to-B shortest route across the site. Re-routing is unacceptable.
- 3.5 Both Finmere and Tingewick are significantly affected by the proposals.

4. THE PLANNING APPLICATION

- 4.1 Finmere Airfield pre-dates the Planning Acts and its very existence became enshrined as part of the open countryside of the District. Neither the existing surfacing nor the quality of the managed environment of it makes any difference to its land use classification as open countryside.

- 4.2 Visual intrusion of an industrial nature into the countryside is contrary to policy and would be emphasised by:
- 9 foot high security fencing
 - a forest of lighting standards (87 lamps)
 - glare and reflection both night and day, from stored vehicles
 - buildings of an industrial nature wholly inappropriate in the countryside
 - a lorry park with vehicles some 13 feet high
- 4.3 The Applicant seeks to screen the development from the A421 along the northern boundary for reasons not of landscaping reasons but of security. Thames Valley Police Authority's advice is not yet forthcoming, but will advise against the crime implications.
- 4.4 AVDC have refused permission for contrived planting schemes. We find this entirely appropriate. Inappropriate trees and banking contribute little to the proposal.
- 4.5 Intrusiveness of the lighting columns and high luminance created are emphasised by the Appellant's demonstration that spillage and visibility will be affecting residents and the environment as far afield as Radclive and Mixbury. Our own Surveys currently under analysis will demonstrate widespread pollution.
- 4.6 It is insufficient to create screening of undesirable developments. To do so suggests in principle that the proposed activity is inappropriate. It is the land use that is the matter at issue, not methods of hiding parts of it.

Planning Policy Guidance Note 7 The Countryside – Environmental Quality and Economic and Social Development

The Government's policies for the countryside are set out in the White Paper *Rural England: a Nation Committed to a Living Countryside*. They are based on ensuring both rural prosperity and the protection and enhancement of the character of the countryside.

Friends of the Earth have been consulted along with other pressure groups to add their comments at Inquiry.

5. RESPONSE TO APPELLANT'S STATEMENT ON DRAINAGE

- 5.1 The Appellant has submitted a Statement on surface water drainage and indicates approval from The Environmental Agency to their proposals, although the letter to the Agency is not revealed.
- 5.2 The Statement sets out to demonstrate that by using the Golpla infiltration system on the current grazing areas, a drainage system will not be required, thus reducing significantly site development costs.
- 5.3 However the Statement fails to address several critical issues raised in BOXCAAR's report to AVDC objecting to the application. These require specific response to justify development.

6. PUBLIC FOOTPATH

- 6.1 All issues raised by BOXCAAR in their objection to the planning application remain unaddressed and consequently form reasoned objection to the Appeal.

The existing footpath, No.19, travels north westerly from south of the proposed storage site along open concreted areas to reach the underpass to the A421. The path is not specifically demarked, but forms a direct and straight link between Finmere and Barton Hartshorn: a route with purpose.

The proposal seeks to divert this route, westerly, northerly and easterly to get back to the original link. As a consequence 350 metres is added, unnecessarily, to the journey. The walking experience will be drastically altered, bounded tightly in a narrow lane by poplars, around three unattractive elevations of fencing, security cameras, lighting columns (16 no) and a landscape of varied painted metalwork. It will be flooded in artificial lighting from the first hint of dusk.

In addition footpath No.1 runs in a north-easterly direction near to the southern and eastern boundaries of the site. This path forms part of the new Bernwood Jubilee Way which is promoted as enabling walkers to enjoy the best of the scenery of the former Bernwood Forest area. A 600 metre length of this path will be marred by a view of the development to one side.

7. LIGHTING

- 7.1 BOXCAAR have initiated a significant and wide ranging survey of the effect of lighting pollution in the immediate vicinity. It remains BOXCAAR's opinion that the Appellant's own evidence condemns the proposal: the survey will demonstrate that many residents will be unacceptably affected. Results of the survey will be published.

- 7.2 The Council for the Protection of Rural England have been consulted, and will be represented at the Inquiry to challenge light pollution issues.

8. ENVIRONMENTAL CONSIDERATIONS

- 8.1 The Local Planning Authority has stated that the application need not be accompanied by an Environmental Assessment.
- 8.2 The Appellant's report states that the "site is flat" which it is not. The report also states that the whole of the site sits below the adjoining A421. This is manifestly not the case when viewed on the site, which rises significantly as one moves away from the adjoining A421 and A4421 such that at the furthest edge away from these roads, the site is well above their level. Cars parked on the site would be visible over its entirety.
- 8.3 The site is referred to as "unremarkable" but it has been an airfield for very many years with a consequent open landscape nature. It is generally planning policy (Aylesbury Vale District Local Plan Deposit Draft, October 1988; Policy RA1, Paragraph 10.67) to retain the open nature of airfields.
- 8.4 The report refers to an impervious hard-surface being laid in the avenues between the car storage areas. This will produce increased run-off and, as we already know from problems at the adjacent Premier Aggregates and Gravel Farm, the water table is very high in this part of the Ploughly Plateau. Additional loading of existing systems will threaten the flood protection of Main Street, Tingewick and other areas.
- 8.5 The 2.7 metre high chain link fence will be unsightly. Any bunds would need to be very high to render even the furthest cars invisible. Creation of high planted bunds would obscure the open nature of the airfield.
- 8.6 Additional hedgerows and lines of poplars are offered. They would do little to reduce the overall visual impact. Traditional hedges would not be tall enough, particularly on a rising site, to screen cars.
- 8.7 Black poplar (*Populus nigra*), would not be suited to the airfield site. They prefer deep, damp soils (river and stream flood-plains) which are not found on the airfield.
- 8.8 The Ecological Appraisal does not mention light pollution. At its nearest point the site is 100 meters from Tingewick West Wood, a County Wildlife Site. Lighting pollution will be significant, having damaging effect of the behaviour of birds, insects and plants that use dark and daylight to assess yearly progression.

- 8.9 A badger tunnel has been provided under the A421 about half way along the northern boundary of the site. There is evidence that badgers are actively using this tunnel, but the development would render it useless as animals would have to divert by an additional 400 metres around the site.
- 8.10 The Ecological Appraisal report states that the bird species seen on the site can find similar habitat in the surrounding land. In fact, such habitat will already be supporting all the population of such birds that it can and a reduction in habitat area and capacity will result in a reduction in overall population. The Appellant consequently seeks to reduce habitat in an unreasonable manner.
- 8.11 The Council for the Protection of Rural England have been invited to contribute to the Inquiry process.

9. COMMERCIAL AND OTHER ISSUES RAISED BY THE PROPOSAL

Consideration of commercial issues raises a number of questions.

9.1 How has MCD Ltd. come to the decision to base their proposed operation at Finmere?

MCD state that they have studied a range of potential locations for developing a car storage facility to replace the present site at Ely in Cambridgeshire.

The initial review of the strategic options appears to be based exclusively upon a comparison of combined vehicle mileages for inbound car movements (from Longbridge) including empty vehicle returns, and outbound movements to dealerships, including empty vehicle returns. It takes no account of the suitability of other sites or whether or not they are brown field, well served by transport infrastructure or host existing car storage or complementary activities.

The mileage calculations (as shown in the detailed discussion which follows) are flawed and are based on incorrect assumptions. The sensitivity of the calculations is such that Finmere/Bicester could just as easily fall in the 50% least suitable sites, as the 3rd ranking position that it is given in the comparison.

Next, specific sites have only been considered within a 25 mile radius of Bicester. Moreover, there is no discussion of why the other sites are not considered further, save for a minimalist tabular comparison which makes sweeping generalisations about their suitability. The other sites appear to be dismissed solely on the basis of generalisations about quality of access to motorway networks. No consideration is given to how the alternative sites compare on other grounds (such as environmental, development status, etc.)

9.2 Method of calculating environmental benefit of using Finmere over other locations

The Appellants state that they will use the site at Finmere airfield as a regional distribution centre for cars from the MG Rover plant at Longbridge and that the purpose of the site is to distribute cars to dealerships in southern England on MG Rover's behalf. Southern England is defined as the area from Norfolk to South Wales.

MG Rover state that the purpose of the development is in no way based on their requirements exclusively. The Appeal is therefore for B8 use at large.

This fact is highly relevant to the key environmental argument put forward about reduced vehicle mileage resulting from this choice of location.

Why?

The calculations put forward by MCD to prove the environmental benefit arising from reduced mileages relies on 2 components:

- (i) The total mileage involved in moving cars from the point of manufacture (shown in the document to be 100% Longbridge) and the distribution facility. This is a simple calculation as it involves multiplying the forecast annual number of inbound movements (+ empty returns) by the road mileage from Longbridge to Finmere.
- (ii) The total mileage involved in moving cars from the distribution facility to the dealerships. This is more complex and relies on the use of MCD's own data on past delivery requirements for the dealerships delivered to in the region concerned.

The claimed mileage saving of using Finmere over Ely is 418,322 miles.

However, significantly 73% of this saving (305,000 miles) arises from the reduced mileage from Longbridge to Finmere compared with Longbridge to Ely. If, as we believe, the cars are definitely not coming exclusively from Longbridge, then the number which accounts for the vast majority of the mileage saving is inaccurate and irrelevant.

Equally, if the second part of the calculation is based exclusively on data for MG Rover's distribution requirements then it, too, is inaccurate and irrelevant.

In MCD's submission they also refer to 10 x 2-way vehicle movements per day to/from other depots. Although these would increase inbound movements by maybe 50%, they are not taken into account when calculating the mileage saving. Depending on their geography, this additional 50% of movements could easily reduce or even reverse the environmental argument if Finmere's location relative to the other depots were less advantageous than for other sites. There appear to be no such depots in the West Midlands area, and therefore it is reasonable to assume that this would be the case.

It is very significant that a small error of say 10% in the calculation would immediately drop Finmere from its current 3rd place, to 10th in order of attractiveness. An equally modest error of 15% would place it in 14th place, i.e. lower than half way up the table of environmentally attractive mileage savings.

9.3 The need to consolidate

The documentation and evidence put forward by MCD consider only a single site solution.

Other profitable and successful companies in this sector of activity rely on a network of sites to achieve the service levels required of their customers. None rely on a single site for reaching such a vast distribution area.

By studying the results of MCD's own modelling, and the manner in which mileage for outbound movements varies by choice of location, it is easy to see that if more than one location were used, spectacular savings on road mileage with greater consequential environmental benefits would result from operating from more than one site, particularly if those sites were central to the densest parts of the dealer network in the region targeted, rather than on the very periphery as is the case with both Finmere and Ely.

In such a strategy, there would be little sense in considering transshipping cars at a site which is a mere 57 miles from their point of manufacture as in the case of Longbridge to Finmere.

9.4 Buckinghamshire County Council Transportation Department

One important omission is the fact that 100% of loaded inbound car carrier movements would approach the site from J10 of the M40 motorway. This would involve them turning right off the A43 at its junction with the A421. As this would involve crossing the heavy, primary traffic flow (Southbound on the A43) it would have frequent and noticeable impact on that traffic flow.

We also have been advised by residents local to that junction that accidents involving goods vehicles overturning on that roundabout have been frequent.

The misleading drawing, studying the geometry of the roundabout at the entrance to the Finmere site, is only shown for the vehicles arriving from the direction of Milton Keynes along the A421, and for vehicles departing the site and turning immediately left towards Bicester.

The latter is claimed not to be a likely route for departing vehicles making the geometry test of no apparent relevance to claimed traffic flows. The former (vehicles arriving from Milton Keynes direction) will clearly be a minority vehicle flow for vehicles entering the site, given the point of manufacture.

By far the biggest single flow will be the arrival of the largest and fully loaded carriers from the A43/M40 direction. This is the most complex negotiation of the roundabout as it cuts across both of the heaviest vehicle flows onto the roundabout – vehicles arriving from Bicester and turning onto the Tingewick bypass, and vehicles coming from the bypass towards all destinations. In the case of the latter flow, not only is the speed of approach high, but drivers not familiar with the area risk being severely confused by slow-moving carriers cutting across them and turning – much earlier than expected – into the site entrance, rather than continuing to the Bicester exit.

The second commonest flow caused by the site will be empty carriers heading back to the A43/M40 cutting awkwardly across the traffic flow arriving from Bicester.

9.5 Access to Highways

There are some fundamental issues of access:

- (i) The key access to the M1 will add the burden of a high number of heavy vehicle movements. The A421 is a single carriageway major commuting route, already suffering considerable weight of traffic and highly sensitive to even small increases in numbers of large vehicles at critical times of the day.

For the residents of a large part of this area of Buckinghamshire and Oxfordshire, the quality of access to Milton Keynes (as an employment centre, the best regional rail access point for London and the route to the main M1 motorway) is economically critical.

Adding this further burden to the route also undermines and contradicts much of the good progress achieved by the heavy investment in the A43 link road between the M40 corridor and M1 corridor.

- (ii) The route claimed for access to the Southbound M40 (i.e. via J10) is indeed the logical one, but rarely do operators use logical routes to convenience other road users. There is a clear mileage advantage in accessing the Southbound M40 via J9 at Bicester that any carrier drivers would exploit, even if some fully-laden vehicles could not do so on grounds of height restriction. Traffic returning from the dealer network would be the smaller, lower carriers.

The effect that this would have on the only access route for local residents to the nearest rail station and retail facilities in Bicester would be dramatic in terms of a further slowing of journey times.

9.6 Coordination of transport issues

BOXCAAR continues to pursue the issues around inter-County dependence. It is anticipated that both County Councils will be represented at the Inquiry to co-ordinate concerns over matters relating to traffic generation on the borders of the Counties where the site is situated.

9.7 Rail connections

Despite heavy reliance by MCD on the environmental benefits arising from mileage savings, no mention is made of the lack of rail infrastructure at the site or even plans for it.

Use of rail for freight movement is:

- near the top of DEFRA's list of priorities for environmental and transport improvements
- very high on MG Rover's list of priorities (they are a leading proponent, innovator and investor in this field: Longbridge has an active railhead)
- commonplace in industry and extremely well suited to the movement of whole cars.

The MCD submission for Finmere is based exclusively on use of road for inbound and outbound movements.

9.8 Impact on local highway network

It is preposterous to state, as the Appellant does, that a HGV movement into and out of this location every 6 minutes would not have a material impact on the local highway network and its users.

9.9 Extension of activities on site

The size of facility that is being proposed is considerable. There is no possibility that a company such as MCD can be successful if it only continues to offer the ability to tranship, store and distribute cars.

Every profitable company in this sector of the market is obliged to offer a diverse range of services both to meet its customers' needs and to establish a sufficiently robust business base.

Many of the other activities that car distribution specialists offer are far more intrusive and environmentally unfriendly than storing and distributing cars:

- Car preparation from simple fitting of electronic equipment, to spray painting, panel beating and de-waxing. The latter activities require use of large noisy facilities, often operated 24 hours/day.

- Car recycling and disposal is a major target market for this type of enterprise driven by the increasing legislative pressure on manufacturers to take responsibility for the management of their product on a 'cradle-to-grave' basis. This again involves activities that would add considerably to the local nuisance and environmental impact.

9.10 Noise from proposed activities

The activities currently being proposed will create noise nuisance. MCD's submission states that this will be heavily concentrated during anti-social hours.

- Noise of HGV vehicle movements accessing and leaving the site by local roads, concentrated during the hours of 04h to 15h. The submission shows HGV vehicle movements as one every 6 minutes
- Noise of carriers over site roads and extensive manoeuvring to place them in position; metallic ramps (against each other and against concrete as they are adjusted for loading/unloading and as cars drive over them)
- Carrier engines running throughout to power hydraulics
- Car engines running during loading, unloading and repositioning
- Car alarms set off by: electronic faults, mishandling, inexperienced staff, high winds, movement of vehicles in very close proximity

9.11 Other

Transport 2002 is currently considering the implications of the proposal and will be represented at the Public Inquiry stage to support objectors.