

Piddington Parish Council

Clerk: Mrs M D Ashton BA Hons, Dip Eur Hum.
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Cherwell District Council
Bob Duxbury
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27th January 2009

SCANNED

PLANNING HOUSING & ECONOMY				
HDCMD	HPAHP	HEDE	HECE	HHS
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Dear Sir,

Re: Planning application 08/02511/F

This Parish Council objects to the application.

From the information presented there are concerns about:-

CDC Letter to CgMs July 2008

Pg 1 para 5: ' the Local Planning Authority is of the opinion that the proposed development would be unlikely to have significant effects on the environment...'

Pg 2 final para ' It is concluded that the proposed development would have a significant effect on the environment and hence that an Environment Impact Assessment would not be required in this instance.'



Please could we have urgent clarification on CDC's position. This Parish Council feels there will be very significant effects on both the local environment and associated infrastructure.

From the UKBA submission:

PLA00-007 Proposed site layout

Parking for approximately 300 vehicles is shown. It is stated in accompanying documentation, the vast majority of these spaces are for staff. This suggests that despite assurances public transport will be used to convey staff to minimise traffic impact, this is unlikely to be the case and we will get a huge build up of vehicles at shift change times.

PLA00-280 Wing elevations.

Building height for each of the eight wings is shown as 16.23metres with equates to 53.25 feet. This is clearly going to be visible above the tree line for years and is totally unacceptable. Photographs presented are not a true representation of the 'on ground' perspective.

This problem could be overcome by either reducing the capacity of the centre (does it really need to be the biggest and it is interesting that capacity remains at the same levels as the earlier proposal for the asylum centre), or by increasing the number of wings. Either option would reduce the height to two storeys.

This design appears to have been adopted on the basis of 'standardization' and 'minimisation of unit costs'. These may be of importance to the UKBA but they should not override the impact on the location and the environment. Maximum height of any new building on this site should not exceed that of the present buildings and the site area could accommodate a two storey design

In the previous application by the Home Office the maximum height of accommodation blocks was 9m and the Sports Hall 11.4m both substantially lower than what is being proposed. Nothing has changed in the surrounding rural area to make these proposals acceptable..

PLA00-006 Existing Aerial Context Plan

The water flow indicators suggest that the site could be subject to major flooding, or if the area is substantially paved/hard standing could cause severe flooding in Widnell Lane. This village has suffered severe localised flooding over the past few years and there is concern this development may increase risk

Traffic

See above PLA00-007.

There is concern about the road junction from Widnell Lane onto the B4011 - a blind spot exists to the north, due to the railway barriers for A Site.

With increased traffic, at shift change and delivery or refuse collection times there will be an increased danger to vehicles turning either way out of the village onto the B4011. Accepting the speed limit has been reduced to 50mph we feel there should be a further reduction from the stretch of Bullingdon Prison to north of the proposed access site including the road junctions of Widnell Lane, Palmer Avenue - with speed cameras and co-operation of the MOD to improve the railway junction.

A lady was killed near this stretch of road before the Asylum application was considered.

The proposed shift patterns will cause congestion.

This village does not want to see single track roads used as unofficial parking - an issue addressed in the last Public Enquiry.

Roofs.

Why does the orientation of the sloping roofs have to face east - towards Piddington? We have been told the roof space will only be used for plant. As such, a simple 180° turn would reverse light pollution to an unoccupied area of the rural landscape and save the village from light pollution.

This planning application shows extensive use of aluminium roofing with no clarification of the finished cladding/colour. All covering should be non-reflective. This is an area of much light aircraft traffic - non-reflective would aid both wildlife and local aircraft traffic.

Lighting

We feel the plans do not give full consideration to light pollution in what is a very rural area and more thought should be taken.

While consideration has been given to light pollution from external sources, emissions from the buildings themselves have not been considered We refer to our comments above about roof orientation. We feel this is a poorly conceived document. This is a rural area with NO lighting at present and an abundance of wildlife.

The Environmental Lighting Assessment was only carried out from publicly accessible areas. They are inadequate.

Section 3.6.4 - 'there would appear to be no public views of any lights within the current site boundary' prompts questions :

How does the existing limited level of lighting compare with the proposed?

What views exist from non-public areas?

No consideration has been given to light pollution from the construction phase of the proposed development which would have considerable impact if conducted throughout the winter months of 2009/10!

Landscaping

'Landscape and Visual Assessment Report' claims in section 10.30 that there will be no change in the 'effects of visual context' - this is totally dependent on the relative height of the buildings (please see above).

There are a number of references to additional planting in various documents but no specific details included.

Noise Pollution

This is being located in a very rural environment and light is not the only pollutant.

Construction noise must be considered by Cherwell District Council, not merely the plant on site but delivery and waste disposal vehicles.

Once operational, noise from inmates, shift changes, traffic movements, plant, numerous deliveries and refuse collections will impact on villagers. Operational noise should be considered.

Storm Water Management

'Drainage and Surface Water Strategy' focuses on the immediate site, there is no assessment for the river Ray or the localised flooding that exists in the village of Piddington. Indeed some villagers are still unable to return to their homes because of flooding experienced last year.

There is mention of rainwater harvesting in the 'Energy Centre and Sustainability Report' but it has no detailed assessment of the impact of increasing the amount of hard surface to the site as a whole and increasing the overall amount of runoff due to the roving onto an already overloaded local surface water drainage system - the river Ray.

Foul Water

Can Thames Water improve the local infrastructure so public hygiene, washing and cooking requirements can be coped with by the sewerage system.

Other comments

The 'planning statement' claims in Section 7.26 the development 'has been designed in scale with the site and within a landscape setting'. Buildings of 16.2 metres height clearly do not support this claim. This Parish Council feel that the documents provided do not address all the issues. We feel it is poorly conceived.

At public consultation meetings, a planting scheme was described for the eastern perimeter of the site that would take 5-10 years to become fully effective. Screening needs to be effective BEFORE CONSTRUCTION BEGINS, thereby addressing issues of construction noise and light pollution.

Understanding that comments should only be made on planning grounds, we also include a letter sent to CDC from the Parish Council raising concerns about the whole development and ask it be considered alongside this correspondence against this proposal.

Community Connect states the 'it is not possible to dictate to staff which way they travel to work' which reinforces our concerns about the traffic plan and the details that has gone into this proposal.

We are concerned that this proposal has not had proper public consultation, issues raised at public exhibitions have not been correctly addressed in this proposal.

Limitation of building height to a two floor design without the sloping roofs.

Effective site screening before construction

Effect on congestion and safety resulting from the significant increase in road traffic and the shift patterns

Re-orientation of roof windows

Specification of roof finish

Limitation of construction noise

Limitation of operational noise

Limitation of light pollution both during construction (recognising Health & Safety plus security issues)

Limitation of light pollution throughout the buildings operational life

Effective storm water management and control of run off.

Yours faithfully



M D Ashton Parish Clerk

Enc. Bob Duxbury previous letter

Piddington Parish Council

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Greystone Lodge, Lower End, Piddington, Oxon OX25 1QD

Community Connect
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25th November 2008

Dear Mr Hoare,

Re: Proposed Immigration Removal Centre at Bullingdon.

Councillors attended both exhibitions and have spoken to Piddington villagers, some of whom felt their own questions were not answered or representatives from the authorities were unable/unwilling to discuss issues and questions raised.

This Parish Council makes the following comments, to which a reply would be appreciated. We understand from a representative at the exhibitions that comments 'would be taken account of in the planning application but there would be no specific responses to individuals'. Concerns are quite genuine.

This Parish Council is also concerned that there is no real consultation and would seek direct involvement at a stakeholder level in the ongoing project to develop the immigration centre, namely a position on the project board. We would also seek direct representation in the management of the centre once open.

Building

Why does this have to be a three storey construction? There is plenty of land available within the site and with the proposed pitch of the roof it will most certainly appear above the tree line.

It was gratifying that two representatives did drive through the village yesterday but it also raises the question of how many site visits have yet been made. Our understanding of the previous planning application for an asylum centre is that Cherwell District Council – the local planning authority, did not approve of three stories then so why now?

The orientation of the rooves concern us. Understanding that 'plant' will be in the roof space, villagers are still concerned about light pollution. By changing the roof light to face the B4011, with the prefabricated design, surely it is a matter of CAD design on a computer? Simply reverse them, if these are plant areas there is no need to orientate to the east/west line anyway.

As yet we have no real idea of what the roof material will be made of. Remember this is within a rural area and that was taken account of at the last proposal.

Lighting

Accepting Mr M Plahi (Ministry of Justice) comments that this would be built to Category C standards and lighting is necessary within a secure unit, light pollution remains a grave concern – as per our comment above re. roof orientation. This may be a ‘brown field site’ but it is within a rural area and we would suggest the CPRE ‘new attitudes to the need for and effectiveness of security lighting’ should be considered, along with The British Astronomical Associations Campaign for Dark Skies.

Traffic

The Parish Council would like to see the results of the traffic surveys. Use of the village roads as a ‘rat run’ on shift changes is concerning villagers. We would like reassurance that construction traffic will NOT use the village, we do have a 7.5T weight limit. At the last proposal there were concerns raised about the amount of parking available for both workers/visitors/legal representatives and that local country (single track) roads could be used as unofficial car parking areas.

Blind Spot

As villagers exit the village from Widnell Lane onto the B4011 there is already a ‘blind spot’ as one looks north, turning towards Bicester, due to the railway crossing for the MOD into A Site. The ‘junction’ boxes are the problem. Will the developers increase the width of the railway crossing to improve road safety at this particular junction.

Construction

There are concerns about construction traffic using the village roads, noise levels during construction and the hours that will be worked. Please could you inform us of what measures will be put in place to minimise noise and disruption to the village.

Flooding

This village has had immediate problems with flooding throughout 2007/8. Concern has been raised that by ‘concreting’ over a fair area there maybe increased problems within the village.

Water/Sewerage

Concerns have been raised about where the water supply will come from the village does have problems with water pressure. The last proposal, as we understand, had the water supply coming from a westerly direction – will this be maintained. Villagers are concerned about the impact of such a large establishment on the present infrastructure. How will waste including rubbish and sewerage be treated?

Security

Please observe our previous comments about involvement SHOULD this development go ahead (Para 3).

Inmates may be desperate to stay. Hypothetical situation - Inmate realises he has passing resemblance to a security guard/officer, with the aid of others, overpowers guard/officer, exchanges clothing plus security pass to gain release.

The response at present would be 'It can not possibly happen' – end of discussion.

Is there not a degree of complacency?

Landscaping

The photographs presented at the exhibitions are inadequate. Concerns are raised that with three stories the centre will impinge on the present tree line. What reassurances do we have that the landscaping will go ahead and not be dropped when this project goes over budget? Can the landscaping, certainly on the Piddington side be instated before the construction work?

This letter, by no means considers all concerns by the 175 households within this parish but it will be published locally and it would be appreciated if answers to some of the questions could be published at the same time.

Thanking you for coming to Piddington with the exhibition, the village which will be most affected beyond Blackthorn with this Government proposal.

Yours faithfully,

M D Ashton

Clerk

cc.

Mr Tony Baldry MP

Mrs C Fulljames County Councillor

Mr Martin Yale UK Border Agency

Mr Manni Plahi Ministry of Justice

Mr Bob Duxbury Cherwell District Council Planning Dept