Dear Planning Policy,

I do not have time to fill in your complicated and time-consuming on-line comment form relating to the Barton AAP proposed submissions document.

Please see the attached word document for my comments on this consultation. I hope this is acceptable.

By the way, I think it is extremely unfair on the public to have two consultations on similar topics with exactly the same deadline (today) – Barton AAP and Sites and Housing DPD. Will someone please take note of this comment and ensure that such a situation does not occur in the future?

Please acknowledge safe receipt of my attached comments,

Thanks
Judy Webb
maintenance programme, planned and costed into the future for the lifetime of the SUDS is irresponsible on the part of Oxford City Council in my view. Maintenance of all SUDS can be planning obligations or as a condition attached to planning permissions for development. This should happen. Or they should be adopted by a local authority and looked after properly.

Section 4 Area action plan boundary, 4.2

See my previous submission on effects of this development on areas at a distance from the site. I still think the sewage from this new development will cause big problems for New Marston in Oxford. I remind officers of the situation that occurred in the development of new housing on the Timbmet site on Cumnor Hill. The first few houses that were built and connected to the existing sewerage network resulted in overloading of the system such that sewage upwelled into the roads further down Cumnor Hill after rain. Building had to stop until a small sewage treatment works was built actually on the Timbmet site. Locals warned that this would happen and their advice was ignored.

Do not let the same thing happen to New Marston. The obvious solution to me would be to put a small sewage treatment works directly on the West Barton site to deal with all its sewage, so that nothing more enters the network travelling under New Marston homes and SSSI meadows. Treated water could then be discharged from West Barton via a pipe to the Cherwell. Plan it in and cost it at this stage to avoid expensive retrofitting of a sewage treatment plant such as at Cumnor Hill Timbmet site.

Section 5 The A40 ring road and new housing

Building new residential homes that front directly onto the ring road is an extremely bad idea. Even if the speed limit is 40mph. This slower speed requirement and more signal controlled junctions will mean the ring road is solid with slower moving traffic for longer each day than at present because it is a major route. Slow moving or stationary traffic will produce higher levels of exhaust fumes which will give a poorer quality of life to the people living there.

It is ridiculous to assume that people will want houses facing on to such a road so that they will 'not feel cut off from Oxford'. What people will want is quiet, unpolluted homes as far away from this congested road as possible. Even with a parallel access road in front of the houses. Just ask the residents of Sunderland Avenue (which has exactly this situation) what they would prefer and be guided by their experience of a major route near their houses. I predict they would all want to be further away.

Why have less planting in the A40 central reservation? Keep what is there and thicken it – reduce the visual impact of the busy road by providing more plant screening for people in houses in the new development so they do not have so many cars to look out on all the time.
Section 6

I think 1200 homes are far too many. The lower value of 800 should be the case. This will ensure the environment these people live in will be more pleasant and the environmental effects of this population increase will be minimal (sewage, recreation pressure etc.) Lower house density means you can use more green soft SUDS like ponds and swales (rather than permeable paving) because there is more space. Building only 800 may mean you can keep them well away from the noisy, fumy, A40 road and the electricity sub-station (health risks). As regards the electricity sub-station screening by a wide buffer of vegetation is the only sensible option. ‘Wrapping it by built development’ puts unfortunate people’s homes next to this ugly and un-healthful structure.

Annex 4 The Land at Barton and its surroundings

Ecology A4.11 No comment in this proposed submission on Sidlings Copse and College pond SSSI?? I made a full comment on my concerns over the greatly increased public access to this sensitive site only 600m from the new development in my comment of 24.06.2011. I fear that significant damage will be its long term fate from public pressure (including dogs). Nothing in these documents says anything about preserving this important site. I suggested diverting footpaths away from it, but in the plan diagrams, they are still there actually encouraging public to walk there. SSSIs of this ancient and fragile sort are not public recreation areas! They are not there for people, they are there for wildlife and they are irreplaceable. Damage to this site is not replaceable for example by doing lots of ‘ecological enhancements’ along the Bayswater brook linear park within the development.
Dear Planning Policy,

On reviewing my earlier Cyclox submission I realise I didn't 'digitally' sign your comment form, here attached is a signed version. (2) and a resend of the our comments letter lest there were any problems with this morning's email and attachments.

Yours sincerely,

Graham Smith

On 23 March 2012 10:24, Graham Smith <[redacted]> wrote:

Please find the response from Cyclox attached,

GRAHAM SMITH,

Graham Paul Smith,
Oxford,

--

Graham Paul Smith,
Oxford,
Barton
Area Action Plan
Comment Form for Proposed Submission Document

Part A

PERSONAL DETAILS
(fill in Part A only once, no matter how many times you fill in Part B)

If you have appointed an agent, please show the agent’s details in this section. Add your details (as client) in the last box.

Title
Mr

First name
Graham

Last name
Smith

Job title (where relevant)
Urban Design Consultant, Cyclox correspondent, CTC National Councillor (SE), UDG Executive member.

Organisation (where relevant)
Cyclox

Address line 1

Address line 2

Address line 3

Address line 4
Oxford

Postcode

Telephone number

Email address (USE CAPITALS)

*Client name and organisation (where relevant)
CYCLOX

Signature: ________________________ Date: __________

DATA PROTECTION
We will make your comments available to the public on paper at our Council offices, libraries or other suitable places, and will also publish them on our website.
We cannot accept anonymous comments. However, if you wish us to remove all personal details except your name and non-specific address (e.g. Oxford) before publishing your comments, please tick this box: ☐
Part A
continued

Do you wish to speak at the examination hearings?

<table>
<thead>
<tr>
<th>No, I do not wish to speak</th>
<th>Yes, I wish to speak</th>
<th>Yes</th>
</tr>
</thead>
</table>

If you answered Yes, please outline why you wish to speak*.

To explore the limitations of the process and the restrictive approach to linkage. To explore and emphasise the need to have good cycling facilities off-site and not the proposals from PBA and WPS.

*Please note: the inspector will decide who to invite to speak at the hearings.

Do you wish to be notified of the following? (tick as appropriate)

<table>
<thead>
<tr>
<th>The submission of the Barton Area Action Plan Document</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>The publication of the inspector’s report</td>
<td>Yes</td>
</tr>
<tr>
<td>The adoption of the Barton Area Action Plan Document</td>
<td>Yes</td>
</tr>
</tbody>
</table>

GENERAL ADVICE
For advice on making a comment please see the accompanying note which is also available at www.oxford.gov.uk/consultation.

When completing the form, please:
- use a separate sheet (Part B) for each comment
- cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it, and
- be as precise as possible.

We would prefer you to submit your response using our online consultation system where possible. This enables us to analyse responses more quickly, reduces the time taken to record them, and is more environmentally friendly.

HOW TO SUBMIT YOUR COMMENTS
Please submit your response online at: www.oxford.gov.uk/consultation
or return the comments form by email or post:
Email: planningpolicy@oxford.gov.uk
Post: Planning Policy, City Development
      Oxford City Council
      St Aldate’s Chambers
      109-113 St Aldate’s
      Oxford
      OX1 1DS

Responses must arrive at the council offices no later than 5pm on 23rd March 2012.

We will not accept comments arriving after this deadline.
DETAILS OF YOUR COMMENT  
(please use a new Part B for each point you are commenting on)

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance.

<table>
<thead>
<tr>
<th>Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)</th>
</tr>
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<tbody>
<tr>
<td>Paragraph</td>
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<tr>
<th>Q2. Do you consider that the document is:</th>
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<tbody>
<tr>
<td>(a) legally compliant? Yes No</td>
</tr>
<tr>
<td>(b) sound? Yes No</td>
</tr>
</tbody>
</table>

*If you have entered No to 2(b), please continue to Q3. Otherwise go to Q4.*

<table>
<thead>
<tr>
<th>Q3. Do you consider the document is unsound because it is not: (tick one box only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) justified? yes</td>
</tr>
<tr>
<td>(b) effective? yes</td>
</tr>
<tr>
<td>(c) consistent with national policy? yes (These criteria are explained in the notes.)</td>
</tr>
</tbody>
</table>

| Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, you may use the box to explain why. |

In my experience decisions have been imposed on the AAP which have been inadequately debated and not publicly argued.

The site, without the ring road, is very distant from the city and the decision to manipulate people’s modal choice is perverse.

There is inadequate consideration of the implications of housing density on car parking, cycle parking, refuse disposal.

Inadequate information about cyclist’s use of subways in the Barton Area, as a springboard for considering change. No acknowledgement of the relatively low use of bicycles for journeys in peripheral estates and thus the levels of promotion required. There is little consideration of the modal split desired and how to get to it.
Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

To complete the AAP by an independent body making complete effort to engage residents and potential future residents of Barton and Barton West so that selfishness and NIMBY attitudes are balanced by social needs.

I have completed a line by line critique of the AAP Proposed Submission (attached).

There is inadequate consideration of the implications of housing density on car parking, cycle parking refuse disposal.

Inadequate information about cyclist’s use of subways in the Barton Area, as a springboard for considering change. No acknowledgement of the relatively low use of bicycles for journeys in peripheral estates and thus the levels of promotion required. There is little consideration of the modal split desired and how to get to it.

(Continue on a separate sheet or expand the box if necessary)

This is the end of the comment form.
This comment form has been approved by the Plain Language Commission.
We have published the Barton Area Action Plan (AAP) for consultation before we submit it for examination\(^1\) by an independent Planning Inspector. Any comments received will be considered by the City Council and the Inspector.

In these notes we explain the criteria that the inspector will use and that you should also use when commenting on the plan.

The planning inspector will consider whether the document:
- complies with the **LEGAL REQUIREMENTS**; and
- is **SOUND**

**LEGAL REQUIREMENTS**
To comply with the legal requirements, the Barton AAP must:
- be identified in the Local Development Scheme\(^2\);
- have involved the community as set out in the Council's Statement of Community Involvement\(^3\);
- be published in line with the procedure for publishing a policy document, as set out in the regulations\(^4\);
- have involved the production of a Sustainability Appraisal Report\(^5\);
- have regard to national policy and conform generally to the South East Plan\(^6\); and
- have regard to the Oxford Sustainable Community Strategy and Oxfordshire Sustainable Community Strategy\(^7\).

**SOUND**
To be sound\(^8\) the Barton AAP must meet these the Tests of Soundness criteria:

<table>
<thead>
<tr>
<th>Be justified</th>
<th>Be effective</th>
<th>Be consistent with national policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Based on robust and credible evidence, the document should:</td>
<td>The policies should be deliverable, and the document should:</td>
<td>Where the DPD differs from national policy, there must be clear and convincing reasons to justify the difference.</td>
</tr>
<tr>
<td>- provide evidence of community participation in its production</td>
<td>- include plans for providing supporting infrastructure;</td>
<td>Please check: that you have stated why differing from national policy makes the document unsound; that you have given details of what the document should say; and that you have provided evidence for this.</td>
</tr>
<tr>
<td>- be backed up by facts;</td>
<td>- face no barriers to delivery in the form of regulations or national planning law;</td>
<td>If you are concerned about a potential omission, please check whether the issue is covered elsewhere in national policy or in another Development Plan Document. If the issue is covered elsewhere, there is no need for us to repeat it in the Sites and Housing DPD and this would not in itself make the document inconsistent with national policy.</td>
</tr>
<tr>
<td>- offer the most appropriate strategy when compared with reasonable alternatives; and</td>
<td>- identify partners who will help deliver it;</td>
<td></td>
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<tr>
<td>- show how the policies are sustainable.</td>
<td>- fit in with the strategies of neighbouring authorities;</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- be flexible enough to adapt to changing circumstances; and</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- allow monitoring against targets linked to the Annual Monitoring Report(^9).</td>
<td></td>
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</tbody>
</table>
GENERAL ADVICE

If you are seeking a change to the document, please check that you have:

- made it clear in what way the document is unsound in regard to the legal requirements and tests of soundness set out above;
- stated precisely how you think the document should be changed;
- supported your comment with evidence showing why the document should be changed; and
- provided all the evidence and supporting information necessary to support or justify your comment and the suggested change, as there will not normally be a later opportunity to comment further.

If you are part of a group who share a common view on how the document should be changed, it would be very helpful for that group to send a single response that represents the view, rather than for many individuals to send in separate comments that repeat the same points. In such cases the group should state how many people it represents and how it has been authorised to do so.

Further detailed guidance on the preparation, publication and examination of DPDs is provided in PPS12 and in The CLG Plan Making Manual.

Useful links

- Local Development Scheme; Statement of Community Involvement; Sustainability Appraisal; Annual Monitoring Report: http://www.oxford.gov.uk/PageRender/decP/Planning_Policy_occw.htm
- Planning Policy Guidance Note 12: http://www.communities.gov.uk/publications/planningandbuilding/pps12lsp (see particularly paragraphs 4.36 – 4.47, 4.51 and 5.52 and the boxed text)

If you would like further advice, please contact the Planning Policy team at:
planningpolicy@oxford.gov.uk

01865 252847

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1 In accordance with the Planning and Compulsory Purchase Act 2004.
2 A programme of work, setting out the documents the Council proposes to produce.
3 A document that sets out a strategy for involving the community in preparing policy documents.
4 This includes publication of appropriate supporting documents, placing an advert in the local press and notifying any persons who have requested to be notified, as set out in the regulations.
5 A tool for appraising policies to ensure they reflect social, environmental and economic factors.
6 The South East Plan sets out the region’s policies in relation to the development and use of land.
7 Plans for the local area that are prepared by the Local Strategic Partnerships.
8 Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning.
9 This monitors progress towards delivery of plans and policies.
Dear Planning Policy,

And now, in a further burst of perceptiveness, I have find a few typos and garbled sentences resulting from compilation of multiple versions. These have been corrected, requiring a few minor changes but as a result some ambiguities have been removed. Note: the Track Changes Option has been used, you can see how much has changed if you select 'Final with mark-up. I have changed the date from 22nd to 23rd and this is suffix (2) after Cyclox in the filename.

Sorry this has slipped the deadline but I commend this version to you,

Sincerely,

Graham Smith

On 23 March 2012 17:23, Graham Smith wrote:

On reviewing my earlier Cyclox submission I realise I didn't 'digitally' sign your comment form, here attached is a signed version. (2) and a resend of the our comments letter ledt there were any problems with this morning's email and attachments.

Yours sincerely,

Graham Smith

On 23 March 2012 10:24, Graham Smith wrote:

Please find the response from Cyclox attached,

GRAHAM SMITH,

Graham Paul Smith,

26/03/2012
Barton Area Action Plan, comments on Proposed Submission, February 2012 on behalf of CYCLOX in particular and informed by my experience as an urban designer

- We comment that the Plan has no adequate analysis of problems associated with this potentially exciting site. It would have been honest to establish a SWOT or other similar analysis – of 'Strengths/Weaknesses/Opportunities and Threats' but this is not explicit.

- The word 'boulevard' is removed which is regrettable as it indicates lowered expectations of the changes to the A40, and of course the AAP drops the entirely advantageous, contemporaneous development at Ruskin Fields to the south.

- The Proposed Submission is much the same story as Preferred Options of 2011, but now with added hubris.

- It is noticeable that there has been more traffic modelling by WSP consultants, of the development's impact on (car and bus) journey times. Cyclists, of course don't suffer delays. But to encourage cycling out from the site this plan is inadequate at considering journeys by bike.

- Because of the impacts of motor traffic on the A40, and at the double-roundabouts at Headley Way – Marston Road, there are significant changes proposed which many residents, existing and potential cyclists may not have noticed. This seems underhand.

- A new design for the controlled crossing of A40, for bus/emergency and 'walking & cycling', is proposed. Cyclists have to make some seven carriageway crossings although the bus will presumably cross in one movement. And so could cyclists

- If that mode was actually important for the AAP authors, as opposed to being little more than a convenient hook on which to assuage the removal of car access.

- There is apparently also a new roundabout alternative, for the A40, somewhere in the ether but we could not find a design. There are many good examples of large roundabouts which safely carry large amounts of cycle traffic, please inform this plan with best practice from elsewhere.

- Cyclo could provide examples.

- There are three additional sets of Toucan crossings of the A40 (we have not worked out what these are like or where they are). To have an impact on motorists' behaviour these crossings need to be well located and supportively designed to benefit cyclists and to be seen as legitimate by drivers. It is unacceptable that they can be 'modelled' but the actual design seems to be omitted.

- The 'bran tub' approach to informing the public is entirely unsatisfactory and is essentially undemocratic.

- At Marston the proposal to get rid of the mini-roundabouts results in a multi-lane, double 'T' junction, traffic light controlled. It has the look of something worthy of the Times 'mark your 500
most dangerous junctions for cyclists". There seems to be no accommodation of cyclists in this
drawing, not one ASL or cycle by-pass. We find this unacceptable.

- The existing cycle underpass on the east of the site is entirely unsatisfactory. There appears to be
  no exploration of how to make the underpass satisfactory
  - i.e. being able to see through,
  - no dog-legs,
  - minimal gradient,
  - adequately lit, designed and surfaced
  - and yet WSP feel free to propose major expenditure off-site, which seems blind to
cyclist’s convenience.

- Engineering consultants will only do what they are asked and maybe they didn’t visit the site. This
design does suggest that the Planners, in briefing the consultants, didn’t see fit to talk about
enabling cycling through design, to achieve ‘modal shift’. This is surprising as the Plan hopes for
a lot of this.

- Criticism of the earlier Plan seems to have had an impact, in terms of the charge that this was
going to be a segregated ‘housing dump’. Now, the repeated ‘pius hopes’ that people will
choose to use a bike and/or public transport, to make journeys and thus achieve integration, wear
thin. This site is accepted as a peripheral place in this Plan, whereas it should be approached as a
potentially more central place, connecting with all neighbouring areas.

- The Barton AAP Plan document has its amusing elements. The City have increased the number
times they use certain key words and I offer these comparisons from the 2011 document:
  - ‘cycle’ from 39 to 45;
  - ‘cycle crossing’ from 5 to 6;
  - ‘links’ from 17 to 24;
  - ‘car’ from 4 to 6 (cars are clearly things we don’t want so we don’t mention them much –
in Public documents);
  - ‘sustainable’ from 20 to 45;
  - ‘vibrant’ from 5 to 41;
  - and ‘integration’ from 16 to 52,

Words, rather than clear beneficial proposals, are worthless in this context and we find this
unacceptable.

- This proposal is a disaster in waiting.

- And we offer no objection to the concept of development here and believe it could be seen as a
really interesting and regenerative location for the underperforming estates alongside.

Graham Paul Smith
For Cyclox

I go through the AAP Proposed Submission section by section in the following pages:

Contents:

44 – Flooding; this might better be headed, Bayswater Brook as it could present, both an opportunity (for
water related housing) and explanation of the threat (of flooding).

How to comment …

The implicit claim that “collaboration etc” has been adequate is not accepted, the exchanges have been
partial in our perception.

1 http://www.times.co.uk/itvl/public/cyclesafety/contact/
We wish to be invited to the independent examination in summer 2012. It is likely to be unsatisfactory if the examination is in the summer when many residents may be taking vacations.

**Forward**

"A thriving and vibrant new community that forms part of our city". We wish to support this objective but are unconvinced that the AAP will lay the foundations for this to be the case. We fear this will be a dormitory. Plans and Policies may not create communities but they can erect impermeable barriers to success. The claim that "extensive consultation etc." has shaped the plan rather suggests a will to debate the issues. This is not accepted, the exchanges have been partial in our perception.

**Introduction p3**

1) The implication that the basic decisions have taken place elsewhere is unacceptable.
2) ditto
3) Fine words which conceal prior decisions
4) It is not at all clear how the Owner and the Planning Authority have been able to maintain a proper disinterested relationship.
5) It is not clear what basis for regeneration is to be established

**Spatial Vision p5**

1) "It will include the range of land uses that form a complete neighbourhood". The scale and form of a 1,000 home development will not create a neighbourhood which has adequate independence.
2) It is difficult to see how the site will be adequately integrated.
3) There will clearly not be strong connections. The quality of the non-motorised connections is a key to connectedness and this is not adduced.
4) The Spatial Vision, Map I is a step back from previous versions. Where is the connection to Northway?

\[(a) ~ \text{The connections drawn (clearly) fail to connect to the streets to the south} \]
\[\text{(b) There is inadequate evidence that the connections proposed will achieve the integration sought. This site is too large to justify playing with resident's life chances etc, and propose such a limited mode choice as making real connections for the community.}\]

**Objectives**

1) This is "general hopes" with inadequate spatial implications
2) "the rest of Oxford", there seems to be an entirely inadequate attention to the experience of cyclists once the Ring Road is crossed (and the experience of crossing).
3) The exclusion of the mode 'private car' is astonishing, unrealistic, and unacceptable social engineering. Cyclox welcomes the enabling of cycling, for all, however this plan reads so one-sidedly it seems bizarre.

\[(a) ~ \text{Bullet 2 uses 'link' in a modally unspecific way.}\]
\[\text{(b) Bullet 4 states there will be noise reductions yet the physical controls proposed seem inadequate for this job. Especially if the noise reduction applies to Northway too.}\]
\[\text{(c) Bullet 5 states a limitation so great that it deserves a major section not being buried.}\]
\[\text{This seems to be manipulative.}\]

4) Low Carbon, what models inform this astonishing claim and hope? The Plan's power to control attractive public transport is inadequate and unlike well-known examples on the continent there is no convenient tram to guarantee desirable vehicles and journey times.
4) **AAP Boundary**

1) These opportunities for regeneration need to be spelled out.
2) The omission of Ruskin Lands is an unacceptable lack of opportunism to create a regenerating location.
   (a) Access to JR is likewise a lost opportunity and weakness in the AAP aspirations.
   (b) Map 2 fails to capitalise on the nearest 'vibrant' local centre, Headington.
   (c) Map 3 omits Ruskin Lands.

5) **Integration** - It is difficult to believe that the place will feel part of Oxford with the constraints imposed on 'normal' behaviour. What evidence can be used to support this gamble?

1) Agree, signals or roundabouts need to be positioned so that a maximum amount of the site and Northway is benefitted by reduced noise/speed.
2) Not just speed limits but changes to lane widths too are likely to be needed to adequately change driver behaviour on the A40. One roundabout is better than one signalled junction but neither are adequate alone to change the nature of the A40, two major 'insertions' are needed to 'blockend' the quieter segment of the A40.
   (a) The following bullets and sections are not explained in terms of density. They don't look like 50Dw/Ha or greater, a density which has been claimed (elsewhere).
   (b) In the same manner to make 'taste' decisions, 'set into the landscape' without the basic density arithmetic is inappropriate.
   (c) The arguments for keeping trees or not reads too randomly especially as the south side of the road is not now included in the Plan.
   (i) BA1 - Transforming the Ring Road – too vacuous, the how is too little explained. The para 2 forbidding access is illogical. Accept the thrust of para 1 of this box. It is a weakness that the desired views and exclusion areas are not specified (re Old Headington). The opportunity to have 'residential scaled' lighting, in addition to the major highway lighting (if present) can do much to change the image of the A40 at night, and also in the day, by reducing Major Road imagery.

4) See above
5) OK
6) OK
7) OK
8) OK
9) May be OK, the carriageway widths may be inappropriate given the densities needed for viability.
   (i) BA2 OK
   (ii) BA3 see 5.11
10) OK
11) Unable to comment, requires experienced user advice
12) OK but considering connections southwards this is oddly sensitive!
13) The use of Boundary Brook could creatively be acknowledged as POS
14) OK
   (i) MAP 4 No mention of Ruskin Land as POS?
   (ii) MAP 5 A confusing map as a number of diverse characters in terms of access are given the same colour and treatment as potential frontage.
15) Bridges, and also causeway if the flood plain requires
16) Nature Parks – need such distance for any ‘natural fauna, flora’?
17) Some contradiction in ‘developing’ a nature park?
18) See comments for Map 4, 5. The sections suggest a standard 6m road which may well be inappropriate.
   (i) **BA4** omit ‘safe’ in para 4. No-one chooses to build ‘unsafe’ cycle routes. The adjective is not needed and could easily provide barriers and fences and thus reduce convenience for cycling.
19) No explanation or examples of how sustainable travel will be encouraged. Do you mean ‘exhortation’?
20) No. A local centre needs to be local to its users not an area (of 1,000 homes). Centres need to be in busy places such as astride the A40.
   (a) Bullets have too much unfounded exhortation. Excise the word ‘safe’ for reasons in BA4 above.
   (b) Car parking should be stated here and not referred back to another document.
   (c) Question, where is bicycle parking to be mentioned, external to the home, for visitors and at destinations, bus stops etc.
21) This car access restriction seems unfair, unreasonable, unusual and unacceptable. What are the reasons? Could the reasons be ameliorated without needing to exclude summarily? There is no explanation for this strange decision. It seems illogical and a knee jerk reaction.
22) Ok
23) ?? It seems odd that three year’s debate and this bus service decision cannot be more convincingly asserted.
24) ?? This feels like whistling in the wind.
25) Ditto above. Where is the way–leave for such an implementation?
   
   (i) **BA5** Where are the identified off-site changes? They are required to make a cycle journey one that could be repeated.
   
   (ii) What is planned for the cycle-walking underpass to the east? This is entirely unedifying and scary.
26) Vehicle Access; this reads as uninformed hopefulness. What evidence of successful and acceptable means elsewhere? A very questionable paragraph.
27) **Entirely unacceptable.** Rat–running at its best is no more than taking the shortest journey. The road environment must make the manner of such journeys acceptable and unthreatening. Furthermore the de–prioritisation for cycling, of this drawing, undermines every one of the claims for priority for active modes elsewhere in the Plan. Assertions are not evidenced for instance re Meaden Hill.
28) Roundabout with segregated signalled arms for cycling are likely to be best for traffic behaviour and for cycling comfort. Cyclox wants all ages to be cyclists. Can children be expected to use the illustration 9 layout? It was briefed very early in the process and does not represent achievement of your transport modal aims. Illn 9 is unacceptable as drawn and cyclists should be prioritised and as conveniently as for buses, or more so. Perhaps the concept of a ‘Cycle Street’ should be used here; it fits the Plan’s aspirations.
29) Agreed. But specifically this is description with inadequate explanation.
30) This is an inadequate and miserabilist attitude. And see 5.27 above. Better to state a goal in positive terms. There are ample means to achieve desired behaviour in the highway.
   
   (i) **MAP 6** This shows only one additional cycle/foot crossing when the WSP Barton AAP Technical Note 6 – Junction proposal plans Interim Model Results for Future Years – Revision D.pdf appears to mention three extra crossings. As did Map 8 from the 2011 document show three. This apparent reduction (or confusion) is **not acceptable.** Normal pieces of ‘town’ have connections at some 40 – 50m.
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(i) **BA7** No, the paths are not direct.

(ii) Para-Bullet 2 ok ... 

(iii) The new junction as drawn is inappropriate and the drawing in WSP’s Tech Note 6 is quite atrocious for prioritising cycling. It should be removed from the document as it looks completely ‘business as usual’ and car dominating.

(iv) Barton-Headington subway needs more than enhancement. This word sounds like decoration. The subway is an unacceptable design now; given the role the AAP suggests for cycling it is yet more unacceptable and quite self-defeating for the Plan’s aims.

(v) The last two bullets are unconvincing and trite, misleading, given all the engineering drawings so far produced.

6) **Vibrant** The calms to vibrant, thriving, complete, are all made without a scrap of evidence presented. This is no more than a wish without reliable evidence.

1) Ok

2) –

3) Where are the appropriate cycle-parking provisions? The existing City document is inadequate for the hopes for this development.

6) **BA8** Housing Mix, this reads as no more than an assertion, where is the argument, evidence and example?

4) –

5) –

6) No adequate evidence for Cyclox or GPS: Urban Design to come to a conclusion. Inadequate off-site cycling provisions have not been included already, nor the subway, so this is uninformative and not trustworthy.

7) –

8) –

9) Ok

10) Ok

11) Ok

8) **BA9** all assertion. Possibly acceptable.

12) Not as stated, the local centre will be likely to expire if it is centrally located as in Barton Estate, retail and other facilities need to be central to a bigger area and astride a busy route. 

The scale of this Local Centre section seems uninformed and unrealistic.
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16) Live work needs specific tax arrangements which generally have not supported this concept. The best that can be hoped for is a decent size for the height of the ground floor.
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18) -
19) 'Heart' again, words blinding experience. Too much hubris in the descriptions and assertions. Who pays?
21) Unnecessary and unproven. Where is the evidence where is the drawing analysis?
22) -
23) Unnecessary prescription.
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7) Innovative Design
   1) Ok
   2) ?
   3) Why not state, rather than expect?
   4) -
   5) -
   6) Unnecessary, as the goal is energy efficiency, and this kind of prescription can all too easily result in perverse outcomes.
   7) - too detailed but ...
   8) -

   (i) BA12 Energy
10) High Quality Design, much of this is in the hands of the developer and too prescriptive. There is no mention of Manual for Streets which would be a more appropriate reminder of the qualities to be achieved in the Planned area.
11) This is very subjective and if it cannot be made objective, should be cut.
12) Ok, could make more use of 'water'.
13) Beware setting up a link – requirement that makes other qualities unattainable.
15) Yes, but why are they not prescribed already and with clarity?
16) Beware setting up a requirement that makes other qualities unattainable. Why 'should ...
   ', when if something is required – use the positive word: must.
17) You have largely prevented links to areas to the south. Quote MFS here.
18) Use of 'SAFE' is redundant. Otherwise 7.18 is basically good. NOT the south facing facades for street extension, this likely to be incorrect and needs straightforward demonstration of sun–path geometries.
19) - ok (no need for 'safe' as exhortation
20) ALL THESE SECTION DRAWINGS ARE TOO SMALL. Illustration 12 demands a dedicated route, why is this necessary? There is inadequate explanation of what is sought and if routes are considered then junctions need as much consideration too. Driveways will reduce the efficiency of street parking and need to be carefully designed. This section is inadequate for
this purpose. III. 15 & 16 suggest too much detailed description of routes which are likely to be unachievable except at the viability of other uses. And maybe unnecessary too.

21) –

8) Implementation

1) –
2) The development is NOT integrated into the rest of the city by any stretch of the imagination, the opposite is more true.
3) Great need to improve cycle provision on and off site. Barely touched upon in much of the Plan.
4) Ditto
5) 6), 7) In these sections don’t underestimate the need to provide adequate and secure cycle parking
8) –

13) BA14 Delivery

Para – Ok
(ii) Ok
(iii) –
(iv) A massive list! Off-site cycling provision a priority, two islands on the A40 a priority. Bike priority if the bus–gate junction is selected.

9) More positive use of water should be considered, for example as in much recent Dutch housing where the water is a benefit.

10) Similarly as above
11) Ditto
12) Ditto

(i) BA15 Flooding ? see above

13) SUDS – OK but this is too prescriptive

14) –
15) –

16) –

(i) BA16 SUDS see above (9) etc

17) –

18) –

(i) BA17 Waste water

19) –
20) –

(i) BA19 Sidings Copse ?

9) Regeneration Barton, Northway this will prove very difficult when decent opportunities’ to achieve normal linkages to the city have been eschewed.

(1) A big problem
(2) Indeed so ... ?
(3) Doubtful
(4) Too assertive depends on viability
(5) No, not enough connectivity to reduce sense of severance.
(6) This is an unproven gamble and is unlikely to be adequate linkage.
(7) … 'could'... ??
(8) Omitting Ruskin lands seems perverse and wrong.
(9) No, these words seem vacuous repetition which don’t grasp the nettle
Anhexe 3
Integration with Barton seems an odd mix
Sustainable travel and manipulation of parking standards sounds to be a blunt weapon, and questionable.

Annexe 4 -
Annexe 5 -
Annexe 6 - seems an inadequate collection of background documents.
No mention of new thinking about transport, MS 1 and 2, nothing about the physical causes of social deprivation.
Nothing suggesting Cycling is understood as a journey mode.
Inadequate references for regeneration.
From: Graham Smith
Posted At: 23 March 2012 10:24
Conversation: prepared response on Barton AAP consultation
Posted To: planningpolicy@oxford.gov.uk
Subject: prepared response on Barton AAP consultation

Please find the response from Cyclox attached,

GRAHAM SMITH,
PERSONAL DETAILS
(fill in Part A only once, no matter how many times you fill in Part B)

If you have appointed an agent, please show the agent’s details in this section. Add your details (as client) in the last box.

Title
Mr

First name
Graham

Last name
Smith

Job title (where relevant)
Urban Design Consultant, Cyclox correspondent, CTC National Councillor (SE), UDG Executive member.

Organisation (where relevant)
Cyclox

Address line 1

Address line 2

Address line 3

Address line 4

Oxford

Postcode

Telephone number

Email address (USE CAPITALS)

*Client name and organisation (where relevant)
CYCLOX

Signature:                                  Date:      23 march 2012

DATA PROTECTION
We will make your comments available to the public on paper at our Council offices, libraries or other suitable places, and will also publish them on our website.

We cannot accept anonymous comments. However, if you wish us to remove all personal details except your name and non-specific address (e.g. Oxford) before publishing your comments, please tick this box:  

Part A

Do you wish to speak at the examination hearings?

<table>
<thead>
<tr>
<th>No, I do not wish to speak</th>
<th>Yes, I wish to speak</th>
<th>Yes</th>
</tr>
</thead>
</table>

If you answered Yes, please outline why you wish to speak*.

To explore the limitations of the process and the restrictive approach to linkage. To explore and emphasise the need to have good cycling facilities off-site and not the proposals from PBA and WPS.

*Please note: the inspector will decide who to invite to speak at the hearings.

Do you wish to be notified of the following? (tick as appropriate)

<table>
<thead>
<tr>
<th>The submission of the Barton Area Action Plan Document</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>The publication of the inspector’s report</td>
<td>Yes</td>
</tr>
<tr>
<td>The adoption of the Barton Area Action Plan Document</td>
<td>Yes</td>
</tr>
</tbody>
</table>

GENERAL ADVICE
For advice on making a comment please see the accompanying note which is also available at www.oxford.gov.uk/consultation.

When completing the form, please:
- use a separate sheet (Part B) for each comment
- cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it, and
- be as precise as possible.

We would prefer you to submit your response using our online consultation system where possible. This enables us to analyse responses more quickly, reduces the time taken to record them, and is more environmentally friendly.

HOW TO SUBMIT YOUR COMMENTS
Please submit your response online at: www.oxford.gov.uk/consultation
or return the comments form by email or post:
Email: planningpolicy@oxford.gov.uk
Post: Planning Policy, City Development
      Oxford City Council
      St Aldate’s Chambers
      109-113 St Aldate’s
      Oxford
      OX1 1DS

Responses must arrive at the council offices no later than 5pm on 23rd March 2012.

We will not accept comments arriving after this deadline.
GENERAL ADVICE

If you are seeking a change to the document, please check that you have:

- made it clear in what way the document is unsound in regard to the legal requirements and tests of soundness set out above;
- stated precisely how you think the document should be changed;
- supported your comment with evidence showing why the document should be changed; and
- provided all the evidence and supporting information necessary to support or justify your comment and the suggested change, as there will not normally be a later opportunity to comment further.

If you are part of a group who share a common view on how the document should be changed, it would be very helpful for that group to send a single response that represents the view, rather than for many individuals to send in separate comments that repeat the same points. In such cases the group should state how many people it represents and how it has been authorised to do so.

Further detailed guidance on the preparation, publication and examination of DPDs is provided in PPS12 and in The CLG Plan Making Manual.

Useful links:

- Local Development Scheme; Statement of Community Involvement; Sustainability Appraisal; Annual Monitoring Report: http://www.oxford.gov.uk/PageRender decP/Planning_Policy_occw.htm
- Planning Policy Guidance Note 12: http://www.communities.gov.uk/publications/planningandbuilding/ppsp12lisp (see particularly paragraphs 4.36 - 4.47, 4.51 and 5.52 and the boxed text)

If you would like further advice, please contact the Planning Policy team at:
planningpolicy@oxford.gov.uk

01865 252847

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1 In accordance with the Planning and Compulsory Purchase Act 2004.
2 A programme of work, setting out the documents the Council proposes to produce.
3 A document that sets out a strategy for involving the community in preparing policy documents.
4 This includes publication of appropriate supporting documents, placing an advert in the local press and notifying any persons who have requested to be notified, as set out in the regulations.
5 A tool for appraising policies to ensure they reflect social, environmental and economic factors.
6 The South East Plan sets out the region’s policies in relation to the development and use of land.
7 Plans for the local area that are prepared by the Local Strategic Partnerships.
8 Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning.
9 This monitors progress towards delivery of plans and policies.
Barton Area Action Plan. comments on Proposed Submission, February 2012 on behalf of CYCLOX in particular and informed by my experience as an urban designer

- We comment that the Plan has no adequate analysis of problems associated with this potentially exciting site. It would have been honest to establish a SWOT or other similar analysis - of 'Strengths/ Weaknesses/ Opportunities and Threats' but this is not explicit.
- We see the word 'boulevard' is removed which is regrettable as it indicates lowered expectations of the changes to the A40,
  - and of course drops the entirely advantageous, contemporaneous development, at Ruskin Fields to the south.
- The Proposed Submission is much the same story as Preferred Options of 2011, but now with added hubs.
- It is noticeable is that there has been more traffic modelling by WSP consultants, of the development's impact on (car and bus) journey times. Cyclists, of course don't suffer delays. But to encourage cycling out from the site this plan is inadequate at considering journeys by bike.
- Because of the impacts for motor traffic on the A40, and at the double-roundabouts at Headley Way – Marston Road, there are significant changes proposed which many residents, existing and potential cyclists may not have noticed. This seems underhand.
- A new design for the controlled crossing of A40, for bus/emergency and 'walking & cycling', is proposed. Cyclists have to make some seven carriageway crossings although the bus will presumably cross in one movement. And so could cyclists
  - If that mode was actually important for the AAP authors, as opposed to a convenient hook on which to assuage the removal of car access.
- There is apparently also a new roundabout alternative, for the A40, somewhere in the ether but we could not find a design. There are many good examples of large roundabouts which safely carry large amounts of cycle traffic, please inform this plan with best practice from elsewhere.
  - Cyclox could provide examples.
- There are three additional sets of Toucan crossings of the A40 (we have not worked out what these are like or where they are). To impact of motorist behaviour these crossings need to be well located and supportively designed to benefit cyclists and to be seen as legitimate by drivers. It is unacceptable that they can be 'modelled' but the actual design seems to be omitted/
- The 'bran tub' approach to informing the public is entirely unsatisfactory and is essentially undemocratic.
- At Marston the proposal to get rid of the mini-roundabouts results in a multi-lane, double 'T' junction, traffic light controlled. It has the look of something worthy of the Times "mark your 500
most dangerous junctions for cyclists!'. There seems to be no accommodation of cyclists in this drawing, not one ASL or cycle by-pass. We find this unacceptable.

- The existing cycle underpass on the east of the site is entirely unsatisfactory. There appears to be no exploration of making the underpass satisfactory
  - (i.e. being able to see through,
  - no dog-legs,
  - minimal gradient,
  - adequately lit, designed and surfaced
  - and yet WSP feel free to propose major expenditure off-site, which seems blind to cyclist's convenience.

- Engineering consultants will only do what they are asked and maybe they didn't visit the site. This design does suggest that the Planners, in briefing the consultants, didn't see fit to talk about enabling cycling through design, to achieve 'modal shift'. This is surprising as the Plan hopes for a lot of this.

- Criticism of the earlier Plan seems to have had an impact, in terms of the charge that this was going to be a segregated 'housing dump'. Now, repeated 'pious hopes' that people will choose to use a bike and/or public transport, to make journeys and thus achieving integration, wear thin. This site is accepted as a peripheral place in this Plan where it should be approached as a more central place connecting with all neighbouring areas.

- The Barton AAP Plan document, has its amusing elements. The City have increased the number times they use certain key words and I offer these comparisons from the 2011 document:
  - 'cycle' from 39 to 45;
  - 'cycle crossing' from 5 to 6;
  - 'links' from 17 to 24;
  - 'car' from 4 to 6 (cars are clearly things we don't want so we don't mention them much – in Public documents);
  - 'sustainable' from 20 to 45;
  - 'vibrant' from 5 to 41;
  - and 'integration' from 16 to 52,

Words, rather than clear beneficial proposals, are worthless in this context and we find this unacceptable.

- This proposal is a disaster in waiting.

- And we offer no objection to the concept of development here and believe it could be seen as a really interesting and regenerative location for the underperforming estates alongside.

Graham Paul Smith
For Cyclox

I go through the AAP Proposed Submission section by section in the following pages:

Contents:
44 – Flooding; this might better be headed, Bayswater Brook as it presents both an opportunity (for water related housing) and a threat (of flooding).

How to comment ...
The implicit claim that "collaboration etc" has been adequate is not accepted, the exchanges have been partial in our perception.

1 http://www.thetimes.co.uk/tto/public/cyclesafety/contact/
We wish to be invited to the independent examination in summer 2012. It is likely to be unsatisfactory if the examination is in the summer when many residents may be taking vacations.

Forward
“a thriving and vibrant new community that forms part of our city”. We wish to support this objective but are unconvinced that the AAP will lay the foundations for this to be the case. We fear this will be a dormitory. Plans and Policies may not create communities but they can erect impermeable barriers to success. The claim that “consultation etc” has shaped the plan rather suggests a limited consultation with partial opportunities to debate the issues. This is not accepted, the exchanges have been partial in our perception.

Introduction p3

1) The implication that the basic decisions have taken place elsewhere is unacceptable.
2) ditto
3) Fine words which conceal prior decisions
4) It is not at all clear how the Owner and the Planning Authority have been able to maintain a proper uninterested relationship.
5) It is not clear what basis for regeneration is to be established

2) Spatial Vision p5

1) “It will include the range of land uses that form a complete neighbourhood”. The scale and form of a 1,000 home development will not create a neighbourhood which has adequate independence.
2) It is difficult to see how the site will be adequately integrated.
3) There will clearly not be strong connections. The quality of the non-motorised connections is a key to connectedness and this is not adduced.
4) The Spatial Vision, Map 1 is a step back from previous versions. Where is the connection to Northway?
   (a) The connections drawn (clearly) fail to connect to the streets to the south
   (b) There is inadequate evidence that the connections proposed will achieve the integration sought. This site is too large to play with resident’s life chances etc by proposing limited mode choice as making real connections for the community.

3) Objectives

1) General hopes with inadequate spatial implications
2) “the rest of Oxford”, there seems to be an entirely inadequate attention to the experience of cyclists once the Ring Road is crossed (and the experience of crossing).
3) The exclusion of the mode ‘private car’ is astonishing, unrealistic, and unacceptable social engineering. Cyclox welcomes the enabling of cycling, for all, however this plan reads so one-sidedly it seems bizarre.
   (a) Bullet 2 uses ‘link’ in a modally unspecific way.
   (b) Bullet 4 states there will be noise reductions yet the physical controls proposed seem inadequate for this job. Especially if the noise reduction applies to Northway too.
   (c) Bullet 5 states a limitation so great that it deserves a major section not being buried. This seems to be manipulative.
4) Low Carbon, what models inform this astonishing claim and hope? The Plan’s power to control attractive public transport is inadequate and unlike well-known examples on the continent there is no convenient tram to guarantee desirable vehicles and journey times.
(a) Limited car parking seems an unfair limitation, depending on the degree of limitation.

5) Urban design 'orthodoxy' speaks of maximising links, unlike this Plan with its unusual interpretations. Links can be controlled if need be.

4) **AAP Boundary**
   1) These opportunities for regeneration need to be spelled out
   2) The omission of Ruskin Lands is an unacceptable lack of opportunism to create a regenerating location
      - Access to JR is likewise a lost opportunity and weakness in the AAP aspirations.
      - Map 2 fails to capitalise on the nearest 'vibrant' local centre, Headington.
      - Map 3 omits Ruskin Lands

5) **Integration** – it is difficult to believe that the place will feel part of Oxford with the constraints imposed on 'normal' behaviour. What evidence can be used to support this gamble?
   1)
   2) Agree, signals or roundabouts need to be positioned so that a maximum amount of the site and Northway is benefitted by reduced noise/speed.
   3) Not just speed limits but changes to lane widths too are likely to be needed to adequately change driver behaviour on the A40. One roundabout is better than one signalled junction but neither are adequate alone to change the nature of the A40, two major 'insertions' are needed to 'bookend' the quieter segment of the A40.
      - The following bullets and sections are not explained in terms of density. They don't look like 50Dw/ha or greater, a density which has been claimed (elsewhere).
      - In the same manner to make 'taste' decisions, 'set into the landscape' without the basic density arithmetic is inappropriate.
      - The arguments for keeping trees or not reads too randomly especially as the south side of the road is not now included in the Plan.

(i) **BA1** Transforming the Ring Road – too vacuous, the how is too little explained. The para 2 forbidding access is illogical. Accept the thrust of para 1 of this box. It is a weakness that the desired views and exclusion areas are not specified (re Old Headington), The opportunity to have 'residential scaled' lighting, in addition to the major highway lighting (if present) can do much to change the image of the A40 at night, and also in the day, by reducing Major Road imagery.

4) See above
5) Ok
6) Ok
7) Ok
8) Ok
9) May be OK, the carriageway widths may be inappropriate given the densities needed for viability.
   - (i) **BA2** ok
   - (ii) **BA3** see 5.11
10) Ok
11) Unable to comment, requires experienced user advice
12) Ok but considering connections southwards this is oddly sensitive!
13) The use of Boundary Brook could creatively be acknowledged as POS
14) Ok
   - (i) **MAP 4** No mention of Ruskin Land as POS?
   - (ii) **MAP 5** A confusing map as a number of diverse characters in terms of access are given the same colour and treatment as potential frontage.
15) Bridges, and also causeway if the flood plain requires
16) Nature Parks – need such distance for any ‘natural fauna, flora’?
17) Some contradiction in ‘developing’ a nature park?
18) See comments for Map 4, 5. The sections suggest a standard 6m road which may well be inappropriate.
   (i) BA4 omit ‘safe’ in para 4. No one chooses to build ‘unsafe; cycle routes. The adjective is not needed and could easily provide barriers and fences and thus reduce convenience for cycling.
19) No explanation or examples of how sustainable travel will be encouraged. Do you mean ‘exhortation’?
20) No. A local centre needs to be local to its users not an area (of 1,000 homes). Centres need to be in busy places such as astride the A40.
   (a) Bullets have too much unfounded exhortation. Excise the word ‘safe’ for reasons in BA4 above.
   (b) Car parking should be stated here and not referred back to another document.
   (c) Question, where is bicycle parking to be mentioned, external to the home, for visitors and at destinations, bus stops etc.
21) This car access restriction seems unfair, unreasonable, unusual and unacceptable. What are the reasons? Could the reasons be ameliorated without needing to exclude summarily? There is no explanation for this strange decision. It seems illogical and a knee jerk reaction.
22) Ok
23) ? It seems odd that three year’s debate and this bus service decision cannot be more convincingly asserted.
24) ??? This feels like whistling in the wind.
25) Ditto above. Where is the way–leave for such an implementation?
   (i) BA5 Where are the identified off-site changes? They are required to make a cycle journey one that could be repeated.
   (ii) What is planned for the cycle–walking underpass to the east? This is entirely unedifying and scary.
26) Vehicle Access; this reads as uninformed hopefulness. What evidence of successful and acceptable means elsewhere? A very questionable paragraph.
27) Entirely unacceptable. Rat–running at its best is no more than taking the shortest journey. The road environment must make the manner of such journeys acceptable and unthreatening. Furthermore the de–prioritisation for cycling, of this drawing, undermines every one of the claims for priority for active modes elsewhere in the Plan. Assertions are not evidenced for instance re Meaden Hill.
28) Roundabout with segregated signalled arms for cycling are likely to be best for traffic behaviour and for cycling comfort. Cyclox wants all ages to be cyclists. Can children be expected to use the Illustration 9 layout? It was briefed very early in the process and does not represent achievement of your transport modal aims. Illn 9 is unacceptable as drawn and cyclists should be prioritised and as conveniently as for buses, or more so. Perhaps the concept of a ‘Cycle Street’ should be used here; it fits the Plan’s aspirations.
29) Agreed. But specifically this is description with inadequate explanation.
30) This is an inadequate and miserablist attitude. And see 5.27 above. Better to state a goal in positive terms. There are ample means to achieve desired behaviour in the highway.
   (i) MAP 6 This shows only one additional cycle/foot crossing when the WSP Barton AAP Technical Note 6 – Junction proposal plans Interim Model Results for Future Years – Revision D.pdf appears to mention three extra crossings. As did Map 8 from the 2011 document show three. This apparent reduction (or confusion) is not acceptable. Normal pieces of ‘town’ have connections at some 40 – 50m.
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   - *(i) **BA 7**  No, the paths are not direct.*
   - *(ii) Para-Bullet 2 ok …*

   - *(iii) The new junction as drawn is inappropriate and the drawing in WSP's Tech Note 6 is quite atrocious for prioritising cycling. It should be removed from the document as it looks completely 'business as usual' and car dominating.*

   - *(iv) Barton-Headington subway needs more than enhancement. This word sounds like decoration. The subway is an unacceptable design now; given the role the AAP suggests for cycling it is yet more unacceptable and quite self-defeating for the Plan's aims.*

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   - *(i) **BA9**  all assertion. Possibly acceptable.*

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18) 
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20) The paedo-phobia in this seems ridiculous and inhuman. Unbelievable. Unnecessary, unnecessary and unproven. Where is the evidence where is the drawing analysis?
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   (i) BA12 Energy
10) High Quality Design, much of this is in the hands of the developer and too prescriptive. There is no mention of Manual for Streets which would be a more appropriate reminder of the qualities to be achieved in the Planned area.
11) This is very subjective and if it cannot be made objective, should be cut.
12) Ok, could make more use of 'water'.
13) Beware setting up a link-requirement that makes other qualities unattainable.
15) Yes, but why are they not prescribed already and with clarity?
16) Beware setting up a requirement that makes other qualities unattainable. Why 'should ...', when if something is required – use the positive word: must.
17) You have largely prevented links to areas to the south. Quote MfS here.
18) Use of 'SAFE' is redundant. Otherwise 7.18 is basically good. NOT the south facing facades for street extension, this likely to be incorrect and needs straightforward demonstration of sun-path geometries.
19) ok (no need for 'safe' as exhortation
20) All these section drawings are too small. Illustration 12 demands a dedicated route, why is his necessary? There is inadequate explanation of what is sought and if routes are considered then junctions need as much consideration too. Driveways will reduce the efficiency of street parking and need to be carefully designed. This section is inadequate for
this purpose. Ill. 15 & 16 suggest too much detailed description of routes which are likely to be unachievable except at the viability of other uses. And maybe unnecessary too.

21)  
(i) BA13 Design  Design Code, a potentially excellent decision but it needs to be the result of study and design and not merely asserted without evidence.

8) Implementation
1)  
2) The development is NOT integrated into the rest of the city by any stretch of the imagination, the opposite is more true.
3) Great need to improve cycle provision on and off site. Barely touched upon in much of the Plan.
4) Ditto
5) 6), 7) In these sections don’t underestimate the need to provide adequate and secure cycle parking
8)  
(i) BA14 Delivery  
(ii) Para – Ok
(iii) –
(iv) A massive list! Off-site cycling provision a priority, two islands on the A40 a priority, bike priority if the bus-gate junction is selected.

9) More positive USE of water should be considered, for example as in much recent Dutch housing where the water is a benefit.
10) Similarly as above
11) ditto
12) ditto
(i) BA15 Flooding  ? see above
13) SUDS – OK but this is too prescriptive
14) 
15)  
(i) BA16 SUDS  see above (9) etc
16)  
(i) BA17 Waste water
17)  
18)  
(i) BA18 Remediation  ?
19)  
20)  
(i) BA19 Sidlings Copse  ?

9) Regeneration Barton, Northway  this will prove very difficult when decent opportunities’ to achieve normal linkages to the city have been eschewed.
1) A big problem
2) Indeed so ... ?
3) Doubtful
4) Too assertive depends on viability
5) No, not enough connectivity to reduce sense of severance.
6) This is an unproven gamble and is unlikely to be adequate linkage.
7) ‘could’... ???
8) Omitting Ruskin lands seems perverse and wrong.
9) No, these words seem vacuous repetition which don’t grasp the nettle
Annexe 3
Integration with Barton seems an odd mix
Sustainable travel and manipulation of parking standards sounds to be a blunt weapon, and questionable.
Annexe 4 -
Annexe 5 -
Annexe 6 - seems an inadequate collection of background documents.
No mention of new thinking about transport, MfS 1 and 2,
nothing about the physical causes of social deprivation.
Nothing suggesting Cycling is understood as a journey mode.
Inadequate references for regeneration.
ROCHE Adrian

From: BrigitFoster
Posted At: 23 March 2012 16:01
Conversation: Comment form for Proposed Barton Area Action Plan
Posted To: planningpolicy@oxford.gov.uk
Subject: Comment form for Proposed Barton Area Action Plan

Dear Sirs,

Please find my comments form in response to the Barton AAP consultation.

Please note that the attached does not include the section "notes on completing Part B".

Yours faithfully

Brigit Foster

26/03/2012
# Barton

## Area Action Plan

Comment Form for Proposed Submission Document

### Part A

### Personal Details

*(fill in Part A only once, no matter how many times you fill in Part B)*

*If you have appointed an agent, please show the agent’s details in this section. Add your details (as client) in the last box.*

<table>
<thead>
<tr>
<th>Title</th>
<th>Ms</th>
</tr>
</thead>
<tbody>
<tr>
<td>First name</td>
<td>Brigit</td>
</tr>
<tr>
<td>Last name</td>
<td>Foster</td>
</tr>
<tr>
<td>Job title (where relevant)</td>
<td></td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td></td>
</tr>
<tr>
<td>Address line 1</td>
<td>[redacted]</td>
</tr>
<tr>
<td>Address line 2</td>
<td>Headington</td>
</tr>
<tr>
<td>Address line 3</td>
<td>OXFORD</td>
</tr>
<tr>
<td>Address line 4</td>
<td></td>
</tr>
<tr>
<td>Postcode</td>
<td>[redacted]</td>
</tr>
<tr>
<td>Telephone number</td>
<td></td>
</tr>
<tr>
<td>Email address (USE CAPITALS)</td>
<td>[redacted]</td>
</tr>
</tbody>
</table>

*Client name and organisation (where relevant)*

**Signature:**

**Date:** 23/3/12

### Data Protection

We will make your comments available to the public on paper at our Council offices, libraries or other suitable places, and will also publish them on our website.

We cannot accept anonymous comments. However, if you wish us to remove all personal details except your name and non-specific address (e.g. Oxford) before publishing your comments, please tick this box: [x]
Part A

Do you wish to speak at the examination hearings?

| No, I do not wish to speak | X | Yes, I wish to speak |

If you answered Yes, please outline why you wish to speak*.

*Please note: the inspector will decide who to invite to speak at the hearings.

Do you wish to be notified of the following? (tick as appropriate)

| The submission of the Barton Area Action Plan Document | X |
| The publication of the inspector’s report | X |
| The adoption of the Barton Area Action Plan Document |

GENERAL ADVICE
For advice on making a comment please see the accompanying note which is also available at [www.oxford.gov.uk/consultation](http://www.oxford.gov.uk/consultation).

When completing the form, please:
- use a separate sheet (Part B) for each comment
- cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it, and
- be as precise as possible.

We would prefer you to submit your response using our online consultation system where possible. This enables us to analyse responses more quickly, reduces the time taken to record them, and is more environmentally friendly.

HOW TO SUBMIT YOUR COMMENTS
Please submit your response online at: [www.oxford.gov.uk/consultation](http://www.oxford.gov.uk/consultation)
or return the comments form by email or post:
Email: planningpolicy@oxford.gov.uk
Post: Planning Policy, City Development
Oxford City Council
St Aldate’s Chambers
109-113 St Aldate’s
Oxford
OX1 1DS

Responses must arrive at the council offices no later than 5pm on 23rd March 2012.

We will not accept comments arriving after this deadline.
**Part B**

**DETAILS OF YOUR COMMENT**
(please use a new Part B for each point you are commenting on)

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance.

| Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number) |
|-------------------------------------------------|-------------------------------------------------|-------------------------------------------------|-------------------------------------------------|
| Paragraph | 5.3 | Policy | Proposals map | Sustainability appraisal |

<table>
<thead>
<tr>
<th>Q2. Do you consider that the document is:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) legally compliant? No X</td>
</tr>
<tr>
<td>(b) sound? No X</td>
</tr>
</tbody>
</table>

If you have entered No to 2(b), please continue to Q3. Otherwise go to Q4.

<table>
<thead>
<tr>
<th>Q3. Do you consider the document is unsound because it is not: (tick one box only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) justified? X</td>
</tr>
<tr>
<td>(b) effective?</td>
</tr>
<tr>
<td>(c) consistent with national policy? X (These criteria are explained in the notes.)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, you may use the box to explain why.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed changes to the A 40 (the Oxford ring road) are not justified and are not consistent with the South East Plan. Under paragraph 5.1 of the Barton Area Action Plan, Oxford City Council states that the ring road forms “part of the strategic highway network” and yet paragraph 5.3 of the AAP proposes major changes to that “strategic highway network”. Dual carriageways with speed limits of 70mph are an economic resource vital to the local and national economy.</td>
</tr>
<tr>
<td>Infrastructure under the SE plan is defined as including the road network (page 38)</td>
</tr>
<tr>
<td>Reducing the speed limit and making the changes to the ring road are counter to the South East Plan Policy CC7 which states (page 37 “the scale and pace of development will depend on sufficient capacity being available in existing infrastructure to meet the needs of new development.”</td>
</tr>
<tr>
<td>5.20 of the SE Plan promotes “delivering efficiency through better use of existing infrastructure” and “providing additional capacity by extending or providing new infrastructure.”</td>
</tr>
<tr>
<td>Section 8.2 of the SE Plan (page 65) notes a challenge is to “maintain high quality radial connectivity to London.”</td>
</tr>
<tr>
<td>Under section 8.6 of the SE Plan (page 65) the Regional Transport Strategy seeks “iii to maintain the existing transport infrastructure as an asset” and “iv to develop road and rail links that improve inter and intra-regional connectivity.”</td>
</tr>
<tr>
<td>SE Plan (page 66) Section POLICY T1: Manage and Invest of the SE Plan (page 66) states “Relevant regional strategies, local development documents and local transport plans should ensure that their management policies and proposals: v improve the maintenance of the existing transport system.”</td>
</tr>
<tr>
<td>Finally, under “Key components” of “manage” in the SE Plan (page 67) are stated as being “seeking greater utilisation of capacity on the existing transport system.”</td>
</tr>
</tbody>
</table>
Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

The A40 is stated at paragraph 5.1 of the AAP to form part of the “strategic highway network” whilst “infrastructure” under the SE Plan includes roads.

It is therefore completely illogical for the Council to, on the one hand acknowledge the A40’s significance as part of the strategic highway network, and yet to then propose building houses fronting onto it, necessitating drastic changes to the road, including reducing the speed limit from 40mph to 70 mph.

As the land proposed for the housing development is currently farm land, there is no logical or sensible reason for why the houses have to be built fronting directly onto the A40 and to then propose that the road must be changed to accommodate this.

In various parts of the SE Plan (as referenced under Q4) the “existing transport system” is to be maintained as an asset. This is of vital importance for the local, regional and national economy and the council must therefore drop its proposed changes to the A40 which are “unsound” because they are “not consistent with national policy” as evidence within the SE Plan.

(Continue on a separate sheet or expand the box if necessary)

This is the end of the comment form.
Consultation

Barton Area Action Plan (Proposed Submission Document)

View User Profile: RB34

Public Profile

Name: Nicole O'Donnell

Email: [redacted]
Private Profile

The Private profile is only visible to this user, and consultation managers. It is not visible to other participants.

Postal Address  Oxfordshire Playing Fields Association

Postcode  OX29

Gender

What is your age?

If you are under 16, what is your date of birth?

What is your ethnic group?

Your ethnic group (if you answered other)

Are you disabled?

Organisation Name

Job Title / Position within the Organisation

Areas of Interest

Survey Types

Contact Details

Organisation Name  Oxfordshire Playing Fields Association

Postal Address  Oxfordshire Playing Fields Association

Postcode  OX29

Prefered Contact Method  Email

Block Postal Contact  No

Block Email Contact  No

Actions

Return to the previous page

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http://consultation.oxford.gov.uk/consult.ti/BartonAAP/viewMember?uid=5042017&...  27/03/2012
### View Representation

<table>
<thead>
<tr>
<th>Representation Information</th>
<th>Barton Area Action Plan (Proposed Submission Document)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Structured Document</td>
<td>Section 5 Integration with surrounding areas and the rest of Oxford Integration with Barton</td>
</tr>
<tr>
<td>Representation ID</td>
<td>50</td>
</tr>
<tr>
<td>Respondent</td>
<td>Nicole O'Donnell</td>
</tr>
<tr>
<td>Response Date</td>
<td>21 Mar 2012</td>
</tr>
</tbody>
</table>

**Which paragraph do you wish to comment on?** (please give relevant paragraph number)

**Which policy do you wish to comment on?** (please give the relevant policy number)

- **BA2 - OPFA strongly backs this policy. BA4 - OPFA would like to see 10% as a minimum given the total number and type of houses is to be confirmed. 10% may not be enough if the mix of housing has more residents who need to use the outdoor space.**

**Do you consider the DPD is Legally Compliant?**

- Yes

**Do you consider the DPD is Sound?**

- Yes

**On which grounds do you consider the DPD unsound?**

- (If applicable)

**Details of why you think the DPD is unsound**

**What changes do you suggest to make the DPD legally compliant or sound?**

**Submission Method**

- Web

---

This page was last modified on 21 Mar 2012 13:37 by Nicole O'Donnell

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Consultation

Barton Area Action Plan (Proposed Submission Document)

Ends on: 23 Mar 2012

http://consultation.oxford.gov.uk/consult.ti/BartonAAP/manageViewRepresentation?r... 21/03/2012
View Representation

Representation Information

Structured Document
Barton Area Action Plan (Proposed Submission Document)
Section 6 A vibrant, vital, inclusive and mixed new community
Multi-purpose community hub

Content [List all representations on this structured document part]

Representation ID 51
Respondent Nicole O'Donnell [List all representations by this respondent]
Response Date 21 Mar 2012

Which paragraph do you wish to comment on? (please give relevant paragraph number)

Which policy do you wish to comment on? (please give the relevant policy number)

BA11 - OPFA strongly backs the proposal to include community sports pitches in the community hub to accommodate both school use and community use out of school hours.

Do you consider the DPD is Legally Compliant?
Yes

Do you consider the DPD is Sound?
Yes

On which grounds do you consider the DPD unsound? (if applicable)

Details of why you think the DPD is unsound

What changes do you suggest to make the DPD legally compliant or sound?

Submission Method Web

Modify  Delete  Back

This page was last modified on 21 Mar 2012 13:39 by Nicole O'Donnell
Consultation

Barton Area Action Plan (Proposed Submission Document)

Ends on: 23 Mar 2012
### View Representation

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<tr>
<td><strong>Structured Document</strong></td>
</tr>
<tr>
<td><strong>Section</strong></td>
</tr>
<tr>
<td><strong>Content</strong></td>
</tr>
<tr>
<td><strong>Representation ID</strong></td>
</tr>
<tr>
<td><strong>Respondent</strong></td>
</tr>
<tr>
<td><strong>Response Date</strong></td>
</tr>
<tr>
<td><strong>Which paragraph do you wish to comment on? (please give relevant paragraph number)</strong></td>
</tr>
<tr>
<td><strong>Which policy do you wish to comment on? (please give the relevant policy number)</strong></td>
</tr>
<tr>
<td><strong>Do you consider the DPD is Legally Compliant?</strong></td>
</tr>
<tr>
<td><strong>Do you consider the DPD is Sound?</strong></td>
</tr>
<tr>
<td><strong>On which grounds do you consider the DPD unsound? (if applicable)</strong></td>
</tr>
<tr>
<td><strong>Details of why you think the DPD is unsound</strong></td>
</tr>
<tr>
<td><strong>What changes do you suggest to make the DPD legally compliant or sound?</strong></td>
</tr>
<tr>
<td><strong>Submission Method</strong></td>
</tr>
</tbody>
</table>

This page was last modified on 21 Mar 2012 13:41 by Nicole O'Donnell
Consultation

Barton Area Action Plan (Proposed Submission Document)

Ends on: 23 Mar 2012
## Representation Information

**Structured Document**
Barton Area Action Plan (Proposed Submission Document)  
Section 5 Integration with surrounding areas and the rest of Oxford  
Integration with Barton  
Content  
[List all representations on this structured document part]

**Representation ID**
53  
**RB34/5/BA4/5**

**Respondent**
Nicole O'Donnell  
[List all representations by this respondent]

**Response Date**
21 Mar 2012

**Which paragraph do you wish to comment on? (please give relevant paragraph number)**
5.16/5.17 - OPFA is concerned at the proposal to develop the nature reserve. Our understanding is that this is used by local children, and that it would be a loss to the local community. Parents may not wish their children to go further afield.

**Which policy do you wish to comment on? (please give the relevant policy number)**

| Do you consider the DPD is Legally Compliant? | Yes |
| Do you consider the DPD is Sound? | Yes |

**On which grounds do you consider the DPD unsound? (if applicable)**

| Details of why you think the DPD is unsound |

**What changes do you suggest to make the DPD legally compliant or sound?**

| Submission Method | Web |

---

This page was last modified on 21 Mar 2012 13:44 by Nicole O'Donnell
Consultation

Barton Area Action Plan (Proposed Submission Document)

Ends on: 23 Mar 2012
ROCHE Adrian

From: Daniel Ludlow
Posted At: 23 March 2012 15:28
Conversation: Comment on Barton Area Action Plan Document
Posted To: planningpolicy@oxford.gov.uk
Subject: Comment on Barton Area Action Plan Document

Good afternoon,

Please find attached a comments form for the Barton Area Action Plan Proposed Submission Document.

Many thanks,

Daniel Ludlow.
**PERSONAL DETAILS**
(fill in Part A only once, no matter how many times you fill in Part B)

*If you have appointed an agent, please show the agent's details in this section. Add your details (as client) in the last box.*

<table>
<thead>
<tr>
<th>Title</th>
<th>Mr</th>
</tr>
</thead>
<tbody>
<tr>
<td>First name</td>
<td>Daniel</td>
</tr>
<tr>
<td>Last name</td>
<td>Ludlow</td>
</tr>
<tr>
<td>Job title (where relevant)</td>
<td></td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td></td>
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<td>Address line 1</td>
<td></td>
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<td>Address line 2</td>
<td></td>
</tr>
<tr>
<td>Address line 3</td>
<td>Oxford</td>
</tr>
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<td>Address line 4</td>
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<tr>
<td>Postcode</td>
<td></td>
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<tr>
<td>Telephone number</td>
<td></td>
</tr>
<tr>
<td>Email address (USE CAPITALS)</td>
<td></td>
</tr>
<tr>
<td>*Client name and organisation (where relevant)</td>
<td></td>
</tr>
</tbody>
</table>

Signature: [Redacted]  Date: 23/03/2012

**DATA PROTECTION**
We will make your comments available to the public on paper at our Council offices, libraries or other suitable places, and will also publish them on our website.

We cannot accept anonymous comments. However, if you wish us to remove all personal details except your name and non-specific address (e.g. Oxford) before publishing your comments, please tick this box: [✓]
Part A
continued

Do you wish to speak at the examination hearings?

<table>
<thead>
<tr>
<th>No, I do not wish to speak</th>
<th>Yes, I wish to speak</th>
</tr>
</thead>
</table>

If you answered Yes, please outline why you wish to speak*.

*Please note: the inspector will decide who to invite to speak at the hearings.

Do you wish to be notified of the following? (tick as appropriate)

| The submission of the Sites and Housing Development Plan Document | ✓ |
| The publication of the inspector’s report | ✓ |
| The adoption of the Sites and Housing Development Plan Document | ✓ |

GENERAL ADVICE

For advice on making a comment, please see the accompanying note which is also available at www.oxford.gov.uk/consultation.

When completing the form, please:
- use a separate sheet (Part B) for each comment
- cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it, and
- be as precise as possible.

We would prefer you to submit your response using our online consultation system where possible. This enables us to analyse responses more quickly, reduces the time taken to record them, and is more environmentally friendly.

HOW TO SUBMIT YOUR COMMENTS

Please submit your response online at: www.oxford.gov.uk/consultation
or return the comments form by email or post:

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Oxford City Council
St Aldate’s Chambers
109-113 St Aldate’s
Oxford
OX1 1DS

Responses must arrive at the council offices no later than 5pm on 23rd March 2012.

We will not accept comments arriving after this deadline.
DETAILS OF YOUR COMMENT
(please use a new Part B for each point you are commenting on)

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>5.27</th>
<th>Policy</th>
<th>Proposals map</th>
<th>Sustainability appraisal</th>
</tr>
</thead>
</table>

Q2. Do you consider that the document is:

(a) legally compliant? Yes ✓ No
(b) sound? Yes ✓ No

If you have entered No to 2(b), please continue to Q3. Otherwise go to Q4.

Q3. Do you consider the document is unsound because it is not: (tick one box only)

(a) justified?
(b) effective?
(c) consistent with national policy?

(These criteria are explained in the notes.)

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, you may use the box to explain why.

Paragraph 5.27 states that: “Any bus service between Northway and the new development is likely to run along Westlands Drive. Meaden Hill is not suitable for buses.”

Westlands Drive is not connected to the A40. Therefore the bus service would have to include another road adjacent to the A40, such as Foxwell Drive. I am of the opinion that paragraph 5.27 is not effective because it does not cite an access route between Westlands Drive and the A40.

If the proposed bus route were to travel down Westlands Drive and onto Foxwell Drive, the buses would have to navigate around a tight chicane, which, I am informed, was included in the road layout to prevent large vehicles (such as buses) from using that route. Therefore I am of the opinion that a significant change of road layout is required to accommodate the bus link to the proposed development, which has not been addressed in this document.

(Continue on a separate sheet or expand the box if necessary)
Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

I propose that the document is changed to include details of the bus link between Northway and the proposed development, which should include whether any road layout changes are necessary.

This will achieve effectiveness in my view because it would address more thoroughly the proposed bus link between Northway and the proposed development, and avoid ambiguity that could cause concern to the residents of Northway – particularly those of Westlands Drive, Borrowmead Road and Foxwell Drive.

(Continue on a separate sheet or expand the box if necessary)

continued

This is the end of the comment form.

This comment form has been approved by the Plain Language Commission.
Notes on completing Part B

We have published the Barton Area Action Plan (AAP) for consultation before we submit it for examination by an independent Planning Inspector. Any comments received will be considered by the City Council and the Inspector.

In these notes we explain the criteria that the inspector will use and that you should also use when commenting on the plan.

The planning inspector will consider whether the document:
- complies with the LEGAL REQUIREMENTS; and
- is SOUND

LEGAL REQUIREMENTS
To comply with the legal requirements, the Barton AAP must:
- be identified in the Local Development Scheme;
- have involved the community as set out in the Council’s Statement of Community Involvement;
- be published in line with the procedure for publishing a policy document, as set out in the regulations;
- have involved the production of a Sustainability Appraisal Report;
- have regard to national policy and conform generally to the South East Plan; and
- have regard to the Oxford Sustainable Community Strategy and Oxfordshire Sustainable Community Strategy.

SOUND
To be sound the Barton AAP must meet these the Tests of Soundness criteria:

<table>
<thead>
<tr>
<th>Be justified</th>
<th>Be effective</th>
<th>Be consistent with national policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Based on robust and credible evidence, the document should:</td>
<td>The policies should be deliverable, and the document should:</td>
<td>Where the DPD differs from national policy, there must be clear and convincing reasons to justify the difference.</td>
</tr>
<tr>
<td>- Provide evidence of community participation in its production</td>
<td>- include plans for providing supporting infrastructure;</td>
<td>Please check that you have stated why differing from national policy makes the document unsound; that you have given details of what the document should say; and that you have provided evidence for this.</td>
</tr>
<tr>
<td>- be backed up by facts;</td>
<td>- face no barriers to delivery in the form of regulations or national planning law;</td>
<td>If you are concerned about a potential omission, please check whether the issue is covered elsewhere in national policy or in another Development Plan Document. If the issue is covered elsewhere, there is no need for us to repeat it in the Sites and Housing DPD and this would not in itself make the document inconsistent with national policy.</td>
</tr>
<tr>
<td>- offer the most appropriate strategy when compared with reasonable alternatives; and</td>
<td>- identify partners who will help deliver it;</td>
<td></td>
</tr>
<tr>
<td>- show how the policies are sustainable.</td>
<td>- fit in with the strategies of neighbouring authorities;</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- be flexible enough to adapt to changing circumstances; and</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- allow monitoring against targets linked to the Annual Monitoring Report.</td>
<td></td>
</tr>
</tbody>
</table>
GENERAL ADVICE
If you are seeking a change to the document, please check that you have:
- made it clear in what way the document is unsound in regard to the legal requirements and tests of soundness set out above;
- stated precisely how you think the document should be changed;
- supported your comment with evidence showing why the document should be changed; and
- provided all the evidence and supporting information necessary to support or justify your comment and the suggested change, as there will not normally be a later opportunity to comment further.

If you are part of a group who share a common view on how the document should be changed, it would be very helpful for that group to send a single response that represents the view, rather than for many individuals to send in separate comments that repeat the same points. In such cases the group should state how many people it represents and how it has been authorised to do so.

Further detailed guidance on the preparation, publication and examination of DPDs is provided in PPS12 and in The CLG Plan Making Manual.

Useful links
- Local Development Scheme; Statement of Community Involvement; Sustainability Appraisal; Annual Monitoring Report: http://www.oxford.gov.uk/PageRender/decP/Planning_Policy_occw.htm
- Planning Policy Guidance Note 12: http://www.communities.gov.uk/publications/planningandbuilding/pps12sps (see particularly paragraphs 4.36 – 4.47, 4.51 and 5.52 and the boxed text)

If you would like further advice, please contact the Planning Policy team at:
planning.policy@oxford.gov.uk

01865 252847

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1 In accordance with the Planning and Compulsory Purchase Act 2004.
2 A programme of work, setting out the documents the Council proposes to produce.
3 A document that sets out a strategy for involving the community in preparing policy documents.
4 This includes publication of appropriate supporting documents, placing an advert in the local press and notifying any persons who have requested to be notified, as set out in the regulations.
5 A tool for appraising policies to ensure they reflect social, environmental and economic factors.
6 The South East Plan sets out the region's policies in relation to the development and use of land.
7 Plans for the local area that are prepared by the Local Strategic Partnerships.
8 Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning.
9 This monitors progress towards delivery of plans and policies.
Consultation

Barton Area Action Plan (Proposed Submission Document)

View User Profile

Public Profile

Name  Adrian Williams
Email  [Redacted]
Private Profile

The Private profile is only visible to this user, and consultation managers. It is not visible to other participants.

Postal Address

Headington
Oxford

Postcode

Gender

What is your age?

If you are under 16, what is your date of birth?

What is your ethnic group?

Your ethnic group (if you answered other)

Are you disabled?

Organisation Name

Job Title / Position within the Organisation

Areas of Interest

Survey Types

Contact Details

Organisation Name

Friends of Old Headington

Postal Address

Headington
Oxford

Postcode

Preferred Contact Method

Email

Block Postal Contact

No

Block Email Contact

No

Actions

Return to the previous page

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http://consultation.oxford.gov.uk/consult.ti/BartonAAP/viewMember?uid=3271201&... 27/03/2012
View Representation

<table>
<thead>
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<tbody>
<tr>
<td>Structured Document</td>
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<tr>
<td>Foreword</td>
</tr>
<tr>
<td>Representation ID</td>
</tr>
<tr>
<td>Respondent</td>
</tr>
<tr>
<td>Response Date</td>
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<tr>
<td>Which paragraph do you wish to comment on? (please give relevant paragraph number)</td>
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<tr>
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<tr>
<td>Do you consider the DPD is Sound?</td>
</tr>
<tr>
<td>On which grounds do you consider the DPD unsound? (if applicable)</td>
</tr>
<tr>
<td>Details of why you think the DPD is unsound</td>
</tr>
</tbody>
</table>

| What changes do you suggest to make the DPD legally compliant or sound? | The proposal to alter the A40 so as to reduce the speed-limit and build houses on the south side of the development area should be withdrawn and replaced by proposals such as those originally canvassed, which entailed the shielding of buildings in the new development by a bank that screens them from the road. |

| Submission Method | Web |

Modify  Delete  Back

This page was last modified on 22 Mar 2012 11:24 by Adrian Williams
Consultation

Barton Area Action Plan (Proposed Submission Document)

Ends on: 23 Mar 2012
# View Representation

## Representation Information

**Structured Document**: Barton Area Action Plan (Proposed Submission Document)

**Representation ID**: 65

**Respondent**

| Name       | Adrian Williams |

**Response Date**: 22 Mar 2012

**Which paragraph do you wish to comment on? (please give relevant paragraph number)**

| Paragraph | 5.33 |

**Which policy do you wish to comment on? (please give the relevant policy number)**

| Policy | BA7 |

**Do you consider the DPD is Legally Compliant?**

| Yes |

**Do you consider the DPD is Sound?**

| No |

**On which grounds do you consider the DPD unsound? (if applicable)**

| Not Justified |

**Details of why you think the DPD is unsound**

Stoke Place is one of the very few remaining footpaths that retains its rural charm and romance within Oxford's city boundaries. The upgrading of it to an "...appropriate standard for a cycle route and footpath..." would inevitably spoil its appearance - the upgrading might even ruin it, and for a purpose that has not been justified by any evidence to demonstrate that there will be a sufficient demand for its use to compensate for the spoilation of its present state.

**What changes do you suggest to make the DPD legally compliant or sound?**

Proposals to upgrade Stoke Place should be withdrawn.

**Submission Method**: Web

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Consultation

Barton Area Action Plan (Proposed Submission Document)

Ends on: 23 Mar 2012
GAUGHAN Kerrie

From: BARBARA MINCHIN
Sent: 11 February 2012 11:49
To: GAUGHAN Kerrie
Subject: Re: Barton Area Action Plan (Proposed Submission Document) - Invitation to Join
Follow Up Flag: Follow up
Flag Status: Completed

and I would urge you to go back to the drawing board if you wish to consider this development truly part of the city. We need more houses but part of an integrated plan not a sort of ghetto. Barton is improving thanks to a lot of hard work and long may it continue not fall by the wayside and all the hard work put in be wasted. Perhaps it should be compulsory for all councillors to spend 3-4 hours using the already overcrowded bus route, at different times of the day to realise Green Road roundabout could not cope.

Oxford City Council Consultations

You’ve been invited to participate in the Barton Area Action Plan (Proposed Submission Document) consultation by the consultation manager, Kerrie Gaughan.
You have been invited to comment on the Barton Area Action Plan proposed submission document. We have invited people who have been involved at an earlier stage of the project; have registrered interest in planning and regeneration consultations in Oxford; and those who have been identified having a particular interest in the Barton, Northway and Old Headington areas. We hope you find this consultation interesting and will have the opportunity to respond; we’d value your thoughts.
Thank you.
Participate in this consultation

If clicking on the above link does not work, 'Copy' and 'Paste' the following line above into your web browser’s address

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Oxford City Council: Town Hall, St. Aldate’s, OXFORD, OX1 1BX
General Enquiries: 01865 249811 Web http://www.oxford.gov.uk

27/03/2012
to whom it may concern,
im delighted to know about the plans for Barton. It would boom our area. It would receive positive comments from other Oxford residents and would attract more people to live here.
i would like to suggest there should be a pool as well for the kids. Not just adults. Our pool is great but pls note that there are so many kids here, and I think its the only pool that has nothing for the kids. The rest have one. It would be more useful for us to have a kiddie pool. Hope you can do something about it since the pool in Marston, Blackbird Leys, Cowley are a bit far from us when in fact we just live in Cranley Rd and its a few steps away from the pool. Thanks.

Yours truly,

DESIREE CRUZ
Dear Head of City Development,

Those of us who care for Northway and it’s environmental issues, have not opposed your plans for a link road and all that entails, because we object to the building of new houses. Our Committee has always ensured that we never ever use housing as a reason for our dissatisfaction with your Barton Area Action Plan.

I am not going to repeat yet again, a list of positive reasons why we do not want Northway to be used as a “rat run” as you know full well that your motives are not to integrate us with Barton, to regenerate both Barton and Northway, to make new public open spaces available etc., etc., etc.,

1. You mistakenly planned 900-1200 new houses in Barton [the number frequently changes!!!] without having first taken into account that all these new residents would need an “in and out” plan. The Green Road Roundabout does not help as Barton does not have it’s own traffic lights.

2. You decide to use Northway as an escape route. Instead of making new public open spaces available for them, you plan to take their green space, bushes and trees, play area and nature area – and bring traffic from the ring road across our Green and through our neighbourhood, where, I might add, we already have an unreasonable level of traffic congestion leading out onto Headley Way.

3. The residents were kept in the dark until we accidentally discovered that Phase 2 was commencing without us having any knowledge of Phase 1. However much Councillors insist that they delivered leaflets through EVERY door in Northway with such information, a whole neighbourhood cannot lose the very information delivered in such a fashion.

4. We really have been told so many lies, either directly or by omission. We do not believe we shall benefit from any of your plans, despite the promise of “open spaces – which you are actually taking from us. “a supermarket and community building” – which we either have, or, as in the case of the community centre, have been promised. A swimming pool, which we have at Marston Ferry and is just as convenient as Barton would be.

We have never shown any desire to be integrated with Barton and Barton, as far
as we know, has never shown any desire to be integrated with us.

Northway and Barton are no more “isolated” now than they have ever been.

Please credit us with just a little common sense and if you have to attempt this Plan, just give it to us straight. Please do not give us any more of this absolute nonsense about how it will benefit us. IT WILL NOT BENEFIT US. WE ARE ALL ADULTS AND BELIEVE IT OR NOT, ARE AS INTELLIGENT AS YOU CLAIM TO BE.

We are all content with our neighbourhood, and as you really have not come up with a single thing that we feel we either have not got, or desperately need, it is quite clear that you are making changes to Northway to enable your Barton plans to go ahead.

Yours faithfully,

Barbara Stone.
Consultation

Barton Area Action Plan (Proposed Submission Document)

View User Profile

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<thead>
<tr>
<th>Public Profile</th>
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</tr>
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<tr>
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<td>Andrew Duffy</td>
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Response x 1

Oxford City Council
PO Box 10, Oxford, OX1 1EN
Tel 01865 249811
Email customerservices@oxford.gov.uk
Web http://www.oxford.gov.uk/
Private Profile

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Postal Address

NFU Office
Views Farm Barns
Great Milton
Oxford

Postcode

OX44 7NW

Gender

What is your age?

If you are under 16, what is your date of birth?

What is your ethnic group?

Your ethnic group (if you answered other)

Are you disabled?

Organisation Name

Job Title / Position within the Organisation

Areas of Interest

Survey Types

Contact Details

Organisation Name
National Farmers Union

Postal Address
NFU Office
Views Farm Barns
Great Milton
Oxford

Postcode
OX44 7NW

Preferred Contact Method
Email

Block Postal Contact
No

Block Email Contact
No

Actions

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### Representation Information

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<td>Which paragraph do you wish to comment on? (please give relevant paragraph number)</td>
<td>Map 1 Spatial Vision</td>
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<td>Which policy do you wish to comment on? (please give the relevant policy number)</td>
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<td>Do you consider the DPD is Sound?</td>
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</tr>
<tr>
<td>On which grounds do you consider the DPD unsound? (if applicable)</td>
<td>Not Justified</td>
</tr>
<tr>
<td>Details of why you think the DPD is unsound</td>
<td>The Map (Map 1) that accompanies the proposed submission suggests that there is existing access by foot and by pedal cycle to the surrounding countryside. This is not correct, Footpaths exist which have restricted use to walkers only and they do not interconnect with the proposed development site. This needs to be addressed and corrected. The existing footpaths need to be shown correctly on your map and their legal status described accurately.</td>
</tr>
<tr>
<td>What changes do you suggest to make the DPD legally compliant or sound?</td>
<td>Maps to be redefined as above. In addition, the effects on surrounding countryside and houses/ farm buildings from the additional surface water run off from this new development needs to be considered in great detail. Sescut Farm (OX3 9TW) is already in a high risk flood area and is at risk from the River Cherwell overflowing. Additional surface run off water into the Bayswater Brook will eventually meet with the Cherwell and puts greater pressure on the capacity of this watercourse.</td>
</tr>
</tbody>
</table>

**Submission Method**

Web

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Consultation

Barton Area Action Plan (Proposed Submission Document)

Ends on: 23 Mar 2012

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