Hello

Please find attached my response to the Barton Proposed Submission, I submit also my original Ruskin submission in support of its exclusion in following email.

Please acknowledge receipt

thanks

Mark Pitt
Introduction
I have made a separate submission regarding the Ruskin Fields proposal which includes an in depth review of green space which is important to read.

This should be submitted both as a response to the Barton Report (AAP) and the Sustainability Appraisal – as the issues raised are very similar.

This is an updated version of my submission to the last consultation, which was also ignored.

Terminology
"Barton Report" refers to Barton AAP Preferred Options Report, Oxford City Council.

The "SA" report refers to the Sustainability Appraisal Report, Oxford City Council.

The "Ruskin Report" refers to "Development promotion for Ruskin College, Oxford"

"LTP3" refers to Oxfordshire Local Transport Plan, Oxfordshire County Council, April 2011.

Italics and bold in references are entirely my own.

Barton AAP Proposed Submission Issues

Proposed Submission – General Key points

No global assessment of Oxford’s overall needs has been considered as part of the AAP, in particular the creation of inequalities of life chances, education and social deprivation arising from the Barton AAP allocation to housing with students occupying most central sites in the DPD.

- The submission repeatedly emphasises how Barton AAP will benefit neighbouring communities but the only known outcomes are increased traffic, crime due to increased population and loss of green space, and a concentration of poverty.
- The surrounding green space listed does not include any in the Barton AAP including Ruskin Fields, it appears it is no longer regarded as such by the Council, in particular Ruskin Fields and the remaining green space South of the A40.
- All issues identified by Old Headington Conservation Area appraisal have not been addressed, neither has the PPS5 requirement to enhance and protect conservation areas and their surroundings.
- "The surrounding countryside with its network of footpaths" does NOT offer opportunities for green space, it is arable and access is limited to a narrow strip of footpath, only Ruskin Fields provides such an opportunity, yet opening or purchase of it has not been considered as per the Green Spaces Strategy.
- Map 1 of the submission still shows access to countryside arrows only to Elsfield and not to Ruskin Fields and Stoke Place.
- Technical Note 6 does not address rat running through Headington which will be a serious concern both from the London Road to JR and reverse.
Social Issues

Social Issues - Key points

- The development intensifies poverty rather than spreading it
- Oxford City has not met its obligations under the Social Equality Act 2010
- Oxford City Council has not considered alternative strategies as required under sustainability legislation and allocated alternative sites to student accommodation with a very poor sustainability outcome
- The map below shows the black arc of deprivation around Oxford that will now increase

The sustainability objectives are worth stating:

"a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible"

It is hard to conceive of a plan that is further from meeting these goals.

Sustainability Appraisal PS Issues

SA Report - Key points

An SA report on the Core Strategy itself would have shown placing high carbon users such as families at the edge of city and students in the centre was socially and environmentally suboptimal.

- Equality objectives cannot be met by placing poor families in a concentrated area of deprivation on the edge of the city adding to the black arc of deprivation shown below
- Superficial tickbox exercise rather than the in depth analysis as is the statutory requirement
- Does not analyse potential housing and population type mixes against SA objectives although this is critically important (see below)
- Performs no analysis of the fundamental problem of increased traffic and emissions
- Does not use data in LTP3 which highlights traffic issues
- Wrongly compares Barton with Barton West that has key differences
- The overall design as so far shown, a very ordinary 1950s Council estate in overall concept, with no innovative features at all.
- There is no strategy, or even causal mechanism explained as to how Barton West will improve surrounding estates
- Overall the report is far below any standard at which it can be considered for submission, lacking basic data, strategies or solutions.

Many of the issues discussed here should have had in depth treatment in the SA report, rather than a list of measures that are legally required in any case presented as strategies, such as schools.
Sustainability Appraisal Objective Overview

If the Council seriously wanted to “to reduce poverty and social exclusion" it would have allocated central locations to family housing and outer locations such as Barton to students and temporary workers.

The Council's measures include for the most part legally required ones such as schools with no actual strategy as to how it intends to mitigate the consequences of its folly and inability to think strategically on a city wide basis.

"Objective 1: to reduce the risk of flooding" – the area is a swamp with very gradual run offs and deep loose sediment soil – the risk is not flooding but dampness and swamping.

"Objective 5: to reduce poverty and social exclusion" see Objective 6 below.

"Objective 6: to raise educational achievement levels and develop the opportunities for everyone to acquire the skills needed to find and remain in work” is not met by placing a concentrated population of poor people on the edge of a city. Providing a school is a legal requirement, not a strategy.

"Objective 8: to create and sustain vibrant communities” - See objective 6, 10.

"Objective 10: to make opportunities for culture, leisure and recreation readily accessible" requires residence in North Oxford, Cowley or the City Centre, not where the population cannot economically support cafes, shops and other facilities.

"Objective 11: to reduce air pollution and ensure air quality continues to improve” will not be achieved by slowing traffic where emissions will go directly into Barton West, reduction in travel is not the issue, reduction in emissions is.

"Objective 12: to address the causes of climate change through reducing emissions of greenhouse gases,” is not met by exacerbating traffic problems and CO2 emissions.

"Objective 13: to conserve and enhance Oxford’s biodiversity" no provision of a wildlife corridor to Ruskin Fields and Old Headington is proposed except the allotments – this needs careful study.

"Objective 15: to reduce road congestion and pollution levels by improving travel choice, shortening length and duration of journeys and reducing the need to travel by car/lorry” Other than vague mention of the Eastern Arc transport system, there are few measures proposed other than cycleways.

"Objective 20: to develop and maintain a skilled workforce to support long-term competitiveness of the region” - providing a school does not achieve this, a strategy is required. Placing a concentrated poor community leads to a poverty of expectations.

"Objective 22: to sustain economic growth and competitiveness across Oxford” throttling a major economic artery does not achieve this.

"Objective 23: to stimulate economic revival in priority regeneration areas.” can only be achieved when the local population has disposable income to create a market, which in turn requires a mixed population of rich and poor.
Core Strategy: Index of Deprivation
Housing Issues

Housing Mix and Balance – Key Points

- No analysis whatever has been done of the required LOCAL housing mix, reference is only to a generic report for Oxford in general.
- The housing mix and future population mix of the development is critical to its sustainability and different populations have different travel requirements, the data provided to match the stated mix is either obsolete, not appropriate, or wrong.
- The site is very attractive to consultants due to its central location in the South, ease of access to the M40 and access to Oxford at weekends, and a "compromise" location for partners that work in two different cities – access to London is particularly important.
- The NE Area will have 37% of the 8000 houses in the Core Strategy, this is unsustainable, and places too much stress on one part of the city.
- Some higher density housing could be provided for short to medium term workers who require basic short to medium term accommodation – this frees accommodation in other areas so is a planning gain.
- The housing register shows the biggest demand is for 1 bedroom accommodation, yet only 100 are provided in defiance of its own data, and a probable higher proportion of single people working at the JR Hospital.

Barton West is situated in the close proximity of the JR Hospital which makes it attractive to both Key Workers, hospital out patients or elderly people and temporary workers on medium term engagements.

These populations should be actively encouraged though correct housing provision as this will reduce congestion and traffic as they are low carbon and traffic populations.

Consultants using Barton West as centrally located base will do nothing whatever to alleviate Oxford’s housing shortage, in fact it will only exacerbate it – again, there is no analysis or management strategy for this.

The Council should not commit itself to a given mix of housing until above is quantified and assessed properly.
Traffic

Traffic Analysis – Key Points

- Oxford is the 13th most congested city in Europe and fourth or fifth in the UK
- It has the 17th highest traffic growth rate in Europe, but the highest congestion of the top 17
- Its traffic is increasing, where there is an approximate 3% fall in Oxfordshire
- Barton will increase traffic in the Oxford area not withstanding some offset from low paid workers moving from Bicester and Abingdon to Barton
- The A40 is the economic artery of Oxfordshire with no alternative route, carrying 50,000 vehicles per day, a natural pinch point (see map below)
- Destination car parking at the JR, other hospitals and BMW is the cause of rush hour congestion and must be addressed as part of the AAP (12,000 places in the NE area)
- Studies show a 40-50% increase in trips to 2016 at AM/PM peak hour with 80-91% increase in journey times, this is unsustainable
- Small increases in car trips results in large increases in delay times and increased emissions
- Car emissions at stop/start conditions appear to equate to the same at 60 MPH, making Barton unsustainable as it increases emissions by reducing speeds
- Marsh Lane, Headley Way and London Road are the most congested roads in Oxford
- Rail running in Old Headington is not addressed or analysed, without a crossing point at the A40 traffic will go from London Road and with it, the other way.
- Key workers and blue collar workers currently living out of the city may move to Barton in the long term, reducing their trips and moving their mode partly to public transport etc, but the “point loading” on the network will increase at rush hour, as will the overall flows.
- Traffic flows from Barton for a blue collar population will be the JR Hospital and other medical sites and BMW this is not assessed or mitigated.
- Public transport solutions such as the Eastern Arc Transit, and bus access from Thornhill and other Park and rides must be a priority and brought forward as a matter of urgency.
- Air Quality is already at dangerous levels in the NE area (see section below)
### TomTom: Congested Cities

<table>
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<tr>
<th>Europe</th>
<th>Name in English</th>
<th>% congested</th>
<th>% congested</th>
<th>difference in % congested 2011-2010</th>
</tr>
</thead>
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<tr>
<td>1 BE</td>
<td>Brussels</td>
<td>38.9</td>
<td>37.7</td>
<td>1.2</td>
</tr>
<tr>
<td>2 PL</td>
<td>Warsaw</td>
<td>38.1</td>
<td>37.5</td>
<td>0.5</td>
</tr>
<tr>
<td>3 UK</td>
<td>London</td>
<td>34.5</td>
<td>34.7</td>
<td>-0.2</td>
</tr>
<tr>
<td>4 PL</td>
<td>Wroclaw</td>
<td>33.1</td>
<td>35.7</td>
<td>-2.6</td>
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<tr>
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<td>Toulouse</td>
<td>33.0</td>
<td>34.8</td>
<td>-1.9</td>
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<td>6 FR</td>
<td>Lyon</td>
<td>32.6</td>
<td>32.3</td>
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<tr>
<td>7 UK</td>
<td>Edinburgh</td>
<td>31.7</td>
<td>34.5</td>
<td>-2.8</td>
</tr>
<tr>
<td>8 FR</td>
<td>Marseille</td>
<td>30.4</td>
<td>31.2</td>
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</tr>
<tr>
<td>9 FR</td>
<td>Paris</td>
<td>29.9</td>
<td>30.4</td>
<td>-0.5</td>
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<td>Manchester</td>
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<tr>
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<td>Milan</td>
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<td>29.4</td>
<td>-1.2</td>
</tr>
<tr>
<td>15 UK</td>
<td>Birmingham</td>
<td>27.5</td>
<td>28.5</td>
<td>-1.0</td>
</tr>
</tbody>
</table>

### LTP3: Figure 13.3 Oxford average congestion 07.00 – 10.00 September 2008 to August 2009

As can be seen above, Marsh Lane and London Road are "red routes" with 100-200% lag time congestion. The A40 immediately next to Barton is not, but that is simply because there are no stops or junctions until Marsh Lane and London Road Roundabout.
Traffic Flows on A40 and Oxford Roads

The above diagram from Oxfordshire Country Council AADT shows 50,000 cars per day on the section of the A40 where Barton West will be built, the highest outside of the A34 and M40.

The funnel effect can also be seen with smaller roads to the North East and West funnelling into the A40 to the M40, and vice versa.

Traffic Increases - PBA Associates – Technical Note 1

The unsustainability of the Barton development can be shown with reference to the PBA report — there are many assumptions and much as already changed, but it is still indicative of increase in Oxford’s traffic.

“The simulation summary statistics for the 2016 AM and PM peaks are shown in Tables 7 and 8 respectively. Table 7 indicates that there is a 42%, 46% and 49% growth in trips the do nothing, low growth and high growth scenarios respectively in the AM peak. These increases in trips result in between a 80% and 91% growth in total time spent on the network, and up to a 55% growth in distance travelled on the network,”

Table 8 shows that there is a 40%, 43% and 47% growth in trips in the do nothing, low growth and high growth scenarios respectively in the PM peak. These increases in trips result in between a 76% and 92% growth in total tune spent on the network, and up to a 59% growth in distance travelled on the network.”
Headington Employers and Destination Parking Provision

Destination Parking – Key Points

- Provision of destination car parking encourages car trips
- The John Radcliffe, Churchill and other employer sites have thousands of “destination” parking places – a management plan must be in place to remove these and replace with alternative provisions to reduce car access
- Very heavy traffic generated on Marsh lane, London Road and Headley Way due to the presence of large employer sites with parking provision of which this probably the largest
- Thornhill Park and Ride is over capacity it is imperative this is integrated better with normal bus services to provide services to the JR and other employment sites, directly to the city via the new A40 link road
- The population of Barton West will have a very close link with the JR and other sites either as employees or patients.

Traffic to the Headington employers is a very important component of the overall congestion in the area.

The following map shows high concentrations of Headington employees at Witney, Bicester and Abingdon. It is to be hoped that over time Barton West would alleviate some congestion by relocation of people nearer to their place of employment.

The Headington/NE area employers are is described in LTP3:

These are:

- The Oxford Radcliffe Hospital Trust (JR and Churchill hospitals)
  The Oxford Business Park off Garsington Road
  BMW Mini Plant
  Oxford Science Park

As can be seen above, most of these are providing blue collar employment opportunities so it is likely they will be “destination car parks” for Barton residents.

The purple patches show employment areas, note the large patch immediately North/North West of London Road.

LTP3: Figure 13.1 Eastern Arc and major employment in Oxford
LTP3 Figure 13.7 Origins of people driving to the Headington (cropped) area (OX3) for work or study (p28)

LTP3 : “13.21 Access to employment in the Eastern Arc from outside Oxford is difficult other than by car.

Oxford is well served by public transport on its radial routes, but park and ride services do not exist to key employment locations in the Cowley and Littlemore area, and the lack of direct bus services from outside Oxford is one of the main reasons why people drive to them. Driving is made more attractive by the availability of a large amount of free workplace parking in the area — a total of over 12,000 spaces at the largest ten employers.

13.22 Three major hospitals are located in Headington, serving patients from across the region. Some direct park and ride services do exist but most patients and visitors from outside the city choose to drive. As there is no direct access from the ring road, hospital trips contribute to congestion on routes into Headington and along the B4495.”
A40 Junction

- Public pressure will make this accessible to the general public within a short timeframe as many residents will either rat run from London Road though Old Headington as they cannot cross at the new junction or via Marsh Lane which is already over saturation either way, rat running through Old Headington will substantially increase.
- Will be used as a rat run for drivers to avoid London Road Roundabout, cut through existing Barton to new junction and on to Marsh Lane/North Oxford
- The junction itself should not cause delays as traffic travels at speed to the London Road and then queues (see map), the problem is the increased car numbers
- Must have bus service from Park and Rides to JR Hospital via Barton (Thornhill)

A40 Key Points

- An approximately 40% reduction in speed may mean a corresponding decrease in carrying capacity
- This road is key to the whole of Oxfordshire’s non motorway road infrastructure, having an key economic role in the County’s transport infrastructure
- It is a traffic funnel – see AADT map above
- The proposals will prevent its future expansion if required and there is no alternative route
- Very heavy congestion in the Sunderland Avenue/Wolvercote roundabout may be related to the nature of the street, indicating Barton A40 treatment infeasible
- A traffic slow down may INCREASE pollution and CO2 emissions as per below section
- 50,000 vehicles a day use this route
- The sunken nature of the Barton site and the direction of the prevailing wind may mean it acts as a natural sink for pollution affecting the health of the residents – this needs more research particularly if speed reduction causes increased emissions due to traffic jams

House Frontages

House Frontages Key points

- The proposed frontage running approximately North/South ending at Stoke Place will funnel pedestrian traffic via Stoke Place, rather than spreading it via several access ways to Headington, to the detriment of the Barton West residents and Headington’s.
- The A40 frontage will be unpleasant and dangerous
Removal of A40 Median Screening

"The central reservation is well planted with mature vegetation. This forms another physical – albeit green – barrier between the strategic development site and the rest of Oxford."

A40 Median Screening - Key Points

- Isolation is measured by the number of crossings, either residents can cross easily or not
- Tree screening in the middle of the road screens one half of the road for residents on either side, a positive amenity gain
- Trees and vegetation adds to the character of a slow road, subliminally affecting driver behaviour
- Removal would affect the setting of the Conservation Area, which it lies just outside of – see Conservation section below, therefore PPSS applies.

Cycle and Pedestrian Links Across the A40

Cycle and Pedestrian Links – Key Points

- The Stoke Place bridleway is a precious and beautiful green lane – it cannot be upgraded to a standard bike path, therefore an alternative as below must exist
- A route emerging from Stoke Place is dangerous as Osler Road and St Andrews Road at the church is already a dangerous pinch point, a suggested route a new route via Laurel Close avoiding properties is suggested below
- A route is required from Stoke Place/Ruskin College through the Parish Hall land to the JR for safety and amenity reasons
- There is a direct inverse relationship between the number and spread of cycleways footpaths from Barton and Headington and the number of car trips
- The more cycleways and walkways, the shorter the average distance for any given resident, and the less the negative impact is for any given resident of Old Headington
- A route from Barton via the Barton Triangle, emerging near the Blackboy, extending across the orchard immediately to the East of Emden House to the back of Bury Knowle House for access to the Park, Library and shops, especially the CoOp would be highly attractive, and divert some foot traffic around Old Headington rather than through it
- All the routes in the Headington area are infeasible on map below
## Old Headington Footways

<table>
<thead>
<tr>
<th>Route</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stoke Place</td>
<td>Priceless green lane, unupgradable</td>
</tr>
<tr>
<td>Osler Road</td>
<td>Very narrow with pinch point at top of hill, impossible for disabled people, impossible to separate cars from pedestrians</td>
</tr>
<tr>
<td>St Andrews Road</td>
<td>Dangerous traffic pinch point with pavement as listed building</td>
</tr>
<tr>
<td>The Croft</td>
<td>Very quiet and beautiful pedestrianised street, used heavily by young children, mentally and physically disabled people and elderly, requires higher degree of protection from car access due to possibly increased numbers of pedestrians due to Barton West</td>
</tr>
<tr>
<td>Barton Triangle</td>
<td>Would be attractive route over the Barton Triangle to back of Bury Knowle park allowing views and access to country</td>
</tr>
<tr>
<td>Suggested Route</td>
<td>New cycleway via Laurel Close resuming thin strip of back garden of Laurel Close social housing, emerging into main branch of Croft running along back of high wall of The Court. This will prevent large numbers of people moving through narrow Laurel Close walkway between houses emerging into The Croft, so the properties losing some garden would gain more privacy at front. Route as described does not go past any house frontages Disabled and children friendly, gentle slope – cycleway would be new branch of Croft Important NOT to use line painting or will spoil The Croft. Would provide safe access to JR and Headington Shops.</td>
</tr>
</tbody>
</table>
Barton West is not Barton or Northway

The SA Report uses as a baseline Barton, Northway and Headington of all metrics including traffic.

Barton West Profile – Key Points

- Social housing tenants ie 40% will not locate there due to proximity to their workplace, but because that is the only prospect of a home, meaning they will need to go to work at possibly quite far locations in the city
- Barton and Northway are mature suburbs where many people are in a far better situation than when the house was first allocated to them, therefore social problems will be more on average
- The JR and other near employers cannot magically create an extra 1000-2000 jobs for the residents of Barton West, meaning travel will be longer congesting the road

Pollution and Air Quality

LTP3: 10.4 “Measurements have shown that high emissions (in g/km) tend to occur at low uneven speeds (e.g. in congested traffic) and at high speeds (e.g. on motorways)..... Emissions under ‘stop-start’ driving conditions tend to be higher than those when vehicles are driven more smoothly.”

Air quality in Oxford

LTP3: 13.32 The national threshold for the air pollutant nitrogen dioxide is exceeded at eight locations in the city. Traffic is the main source of emissions at all eight of these “hotspots”. The hotspots are:

- city centre;
- Headington roundabout;
- Headington centre;
- Summertown centre;
- Cowley centre;
- Wolvercote roundabout;

The fundamental issue is that pollution from cars in traffic jams next to large centres of population is more injurious to health than cars travelling rapidly from further afield and arriving over a longer period of time at peak hours.

Barton AAP Enlargement

The area should be expanded to include John Radcliffe and Thornhill Park and Ride due to the intimate relationship between the new development and the JR and other hospitals, and the community in general as described above.

Flood Risk

The land is very boggy with very deep soil overburden, analysis of flooding may not be the correct metric for land suitability.
Health risks from locating a development in a swamp have not been assessed.

Bayswater Brook appears to have substantial sewage content from the grey tinged water.

**Local Services**
A medium store should be provided:

- To reduce trips from Barton West to other stores saving residents costs and reducing congestion, particularly to large stores on the ring road and Headington
- A small store may result in a health and safety issue as it will only marginally reduce demand – the Tescos in Cowley is of small size but is appears to be frequently dangerously overcrowded
- A small store provision would be discriminatory to disabled people as they would need to travel very long distances at extra cost
- It would not a “target” store for A40 users as access will be difficult and parking restricted
- A public house must be provided

**Green Space**

**Green Space – Key Points**

- Green Spaces survey identified NE Area has having the least even before the Barton development
- Ruskin Fields are the only pastoral landscape left
- Elsfield fields are arable and cannot even be walked on
- Green corridors need to be provided between the Barton and Old Headington.
- The green space proposed in the linear park is virtually unusable cul de sac, going nowhere, space is best used when walked through on the way to shops etc such as Ruskin Fields, placed only as the area cannot support housing
- None of the green space of Old Headington is marked as such, although it is very attractive countryside and could be made accessible

**Green Fields At Ruskin**

**Ruskin Fields – Key Points**

- The small, intimate and pastoral nature of the green fields is unique in the area and represents a precious ecological and conservation resource, and has no equivalence with wide featureless arable fields of Elsfield.
- Field sizes are very small as they were protected from early 20 century field enlargement due to the isolation imposed by the ring road – this in itself gives them conservation value
- Will be the only accessible pastoral green fields for children once Barton West is built, and will be a precious island of England’s green and pleasant land, surrounded by high density modern housing.
- A reservoir of wildlife for the whole area
- Represent a resource for the people of Barton, Barton West and Northway
- Ruskin Fields are the largest and most visible green English countryside accessible and visible to the general public
- Development at Barton West will partially impair the outward view due to the fall of the land at this location, but Ruskin development will destroy it.
- The Green Spaces Strategy requires to Council to bring this into public ownership or use due to the shortage of green space in the NE Area

Children should have the chance to connect to the countryside, particularly if they live in high density, modern monotonous estates such as Barton West, Northway and Barton – these fields provide children the chance to connect to the countryside on a daily basis on the way to Headington Shops, therefore their potential amenity value is high.

People need to have a sense of place and location which is provided by these fields, rather than a monotonous arc of modern high density housing with some of the highest deprivation levels in the country.

In planning terms, the quality and amenity value of these fields is very high, in contrast to the other green spaces in the surrounding area - see below.

**Views – The Value**

The views of green space in the Conservation Area are limited as indicated in table above in green space section.

There are views into the Conservation Area over Ruskin Fields from many points North of the A40. Should the proposed conversion of the A40 to a boulevard goes ahead, the view from this location will be more important than it currently is.
Stoke Place Bridleway
The views offered of Ruskin Fields represent the LAST view of English Countryside that can be enjoyed by the residents of the suburbs of Barton, Barton West, Northway and Headington within an evening’s walk of their homes.

**Green Space at Elsfield has only some Amenity**

The Barton Report statement:

"policies also acknowledge that larger areas of new development such as this provide opportunities to open up access to off-site areas of green space. The surrounding countryside with its network of footpaths offers such potential"

Is not correct – Elsfield is arable land and access is limited to a narrow strip of land. Ruskin Fields provides far better opportunities for circular walking and jogging.
Barton Report: Map 1: Context (p8) incorrectly showing green space

Barton Report Green Space Map is not Correct or Representative

The Barton Report Map above shows a totally incorrect view of green space in the area—a summary is provided below.

It appears from above that the fields on the South side of the A40 are no longer considered Open Space as are many other spaces listed below.
<table>
<thead>
<tr>
<th><strong>Green Space</strong></th>
<th><strong>Summary</strong></th>
</tr>
</thead>
</table>
| Ruskin Fields and rural fringe on South side of A40 | See above – omitted above although the most important in the area, one can only assume as already intended for development  
Views: Last pastoral fragment of English countryside, accessible to public |
| Elsfield Hill North of Barton West | Very large field sizes, arable, only narrow strip of footpath available for walking – not on way to anywhere, low habitat opportunities in relation to size  
Views: Nice from a distance, featureless and unattractive to walk on |
| Headington Cemetery | A place to get away life, but not really usable, Not shown on Barton AAP map  
Views: Gravestones |
| Barton Triangle | Private property, inaccessible – partial views only from Barton Lane  
Views: Obscured by hedges across road from footpath on South side of Barton lane. |
| Headington House | Entirely concealed by high walls and inaccessible, some good habitat. Not shown on Barton AAP  
Views: Nil except trees on Northern wall |
| JR Hospital | Private, hard to use, habitat only on 4 metre strip at Cuckoo Lane  
Scheduled for development under DPD  
Not shown on Barton AAP  
Views: Urban park, some trees, intrusion by hospital etc |
| Barton Road Cricket Ground | Development pending, unusable  
Shown on Barton AAP, but fenced off and will be developed  
Views: Almost none |
| Bury Knowle Park | Good public space but suboptimally organised and far from Barton West and Northway although used by residents of Barton and Northway, little habitat in relation to size  
Views: Urban Parkland |
| Northway Playing Fields | Blank featureless, devoid of wildlife – sport only  
Views: None |
| Northway A40 fringe | Blank featureless, devoid of wildlife – small playground  
Due to be developed as part of AAP  
Views: None |
| Patch of green Barton Lane/A40 | Very small, not useable, overlooking A40, not shown on AAP |
| Barton Lane Playground | Good playground and public space, but little wildlife habitats, too far for residents of Northway and Barton West  
Views: Urban parkland |
Conservation Area Duties

Conservation Area - Key Points

The Council has a responsibility under PPSS to “protect and enhance” Conservation Areas “and their surroundings” this means development of Stoke Place, Ruskin Fields, or the removal of the A40 median screening would be directly counter to this.

The Old Headington Conservation Area Appraisal report makes specific mention of all of above, and also the tranquillity of the village — there is nothing in the proposal to address any of these.

DESIGNATED HERITAGE ASSET

A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated as such under the relevant legislation.

Presumption Against Development of Designated Heritage Assets

In contrast to the usual presumption in favour of development, in relation to a Designated Heritage Asset HE9.1 states there is a presumption AGAINST development.

HE9.1 There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

The Barton proposal has no positive Conservation outcomes at all.

There appears to be not even an objective to incorporate local, traditional design features in the estate.

Oxford Poor Conservation Policy Criticised as a Matter of Public Record

In the final Planning Inspectors’ Report on the Core Strategy on 21 December 2010 the following statements are of note:

“The built environment – Policy CS19

4.107

The Revised Submission Plan introduces changes which highlight the exceptional quality of the city’s built and historic environment through the early sections of the document. However, the single policy on this issue appears only to be lukewarm in its approach to this major asset. Policy BE6 of the RSS talks of protecting, conserving and enhancing the historic environment. It is somewhat surprising that this Core Strategy refers only to the respecting of the historic environment. Oxford deserves more robust policies than this.

4.109In order to make the Core Strategy sound, the following changes should be made:
i) The deletion of the second part of Policy CS19 and its replacement by:
“Development proposals should respect and draw inspiration from Oxford’s unique historic environment (above and below ground), responding positively to the character and distinctiveness of the locality. Development must not result in loss or damage to important historic features, or their settings, particularly those of national importance and, where appropriate, should include proposals for enhancement of the historic environment, particularly where these address local issues identified in, for example, conservation area character appraisal or management plans.”

Mark Pitt
OX3
Hello

Please find attached my objection to the Ruskin development which I include in support of its exclusion from the Barton development.

thanks

Mark Pitt
Ruskin Fields Development Submission

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Ambit

Housing and transport issues are not addressed as these are similar to the Barton development proposals and are treated in that submission.

Introduction

The "Ruskin Report" refers to "Ruskin Fields Development promotion for Ruskin College, Oxford, by West Waddy ADP"

http://www.oxford.gov.uk/PageRender/decP/BartonAAP.htm

at end of "Published May 2011" section or:

http://www.oxford.gov.uk/Direct/WestWaddyADP/RuskinFieldsDevelopmentPromotion.pdf

Please open this to cross reference quotes and images commented on here.


Green Fields

Green Fields – The Value

The value of the green fields can be summarised as:

- The small, intimate and pastoral nature of the green fields is unique in the area and represents a precious ecological and conservation resource, and has no equivalence with wide featureless arable fields of Elsfield.
- Field sizes are very small as they were protected from early 20 century field enlargement due to the isolation imposed by the ring road – this in itself gives them conservation value
- Will be the only accessible pastoral green fields for children once Barton West is built, and will be a precious island of England’s green and pleasant land, surrounded by high density modern housing.
- A reservoir of wildlife for the whole area
- Represent a resource for the people of Barton, Barton West and Northway
- Ruskin Fields are the largest and most visible green English countryside accessible and visible to the general public
- Development at Barton West will partially impair the outward view due to the fall of the land at this location, but Ruskin development will destroy it.

Children should have the chance to connect to the countryside, particularly if they live in high density, modern monotonous estates such as Barton West, Northway and Barton – these fields provide children the chance to connect to the countryside on a daily basis on the way to Headington Shops, therefore their potential amenity value is high.
People need to have a sense of place and location which is provided by these fields, rather than a monotonous arc of modern high density housing with some of the highest deprivation levels in the country.

In planning terms, the quality and amenity value of these fields is very high, in contrast to the other green spaces in the surrounding area - see below.

Natural England Objections and Accessible Natural Greenspace Standards

Natural England whose mission is:

"Natural England is the government’s advisor on the natural environment. We provide practical advice, grounded in science, on how best to safeguard England’s natural wealth for the benefit of everyone”

Provided this response to the ORIGINAL Barton AAP Scoping Report, if Natural England feels Barton as originally defined was objectionable, the further loss of green space must be of deep concern.

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural England</td>
<td>The latest health profile for Oxford highlights scores well below the national average for physically active children. Feel this data should be included in the assessment and measures bought in to rectify this. This could include the provision of accessible natural greenspace, and play areas which encourage natural play.</td>
</tr>
<tr>
<td>Natural England</td>
<td>The areas of green spaces listed are formal areas by nature e.g. recreation ground. Would like to see that the Accessible Natural Greenspace standards (ANGst) are used, to ensure that people have access to natural greenspace and not just mown and manicured playing fields.</td>
</tr>
</tbody>
</table>
Green Fields - Ruskin Report Debunked

"Within each Conservation Area there are areas of higher and lesser significance. In a similar fashion within an individual site there will be areas that are more significant and in need of protection than others. Development is only proposed in the areas of the site that are considered to be less significant." (p23)

Ruskin Fields are one of the most important assets in the Conservation Area.

Value of green space as a community asset is not discussed in any depth.

“In assessing the contribution made to the character of the Area by green spaces (section 4.20) it has to be admitted that Ruskin Fields cannot approach the kind of positive effect made by parks or gardens”

Parks and gardens exist inside and outside Conservation Areas – the LAST pastoral piece of English countryside accessible to city residents in the area is of far higher value.

“Development that takes place on the site will incorporate as far as possible existing features and enhance the character of the area.”

It appears “enhancing the character of the area” is concreting over the last pastoral fields accessible and visible to the residents of Barton West, Northway and Headington.

Ruskin Report, figure 8 (p6) presents an fundamentally incorrect view of the green space available in the area, not listing the development site itself as the largest significant space available. Please refer to the Ruskin Report for the diagram.
<table>
<thead>
<tr>
<th>Green Space</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ruskin Fields</td>
<td>See above – omitted from &quot;key spaces&quot; above although the most important in the area</td>
</tr>
<tr>
<td></td>
<td>Views: Last pastoral fragment of English countryside, accessible to public</td>
</tr>
<tr>
<td>Elsfield Hill North of Barton West</td>
<td>Very large field sizes, arable, only narrow strip of footpath available for walking – not on way to anywhere, low habitat opportunities in relation to size</td>
</tr>
<tr>
<td></td>
<td>Views: Nice from a distance, featureless and unattractive to walk on</td>
</tr>
<tr>
<td>Headington Cemetery</td>
<td>A place to get away life, but not really usable</td>
</tr>
<tr>
<td></td>
<td>Views: Gravestones</td>
</tr>
<tr>
<td>Barton Triangle</td>
<td>Private property, inaccessible – partial views only from Barton Lane</td>
</tr>
<tr>
<td></td>
<td>Views: Obscured by hedges across road from footpath on South side of Barton lane.</td>
</tr>
<tr>
<td>Headington House</td>
<td>Entirely concealed by high walls and inaccessible, some good habitat.</td>
</tr>
<tr>
<td></td>
<td>Views: Nil except trees on Northern wall</td>
</tr>
<tr>
<td>JR Hospital</td>
<td>Private, hard to use, habitat only on 4 metre strip at Cuckoo Lane</td>
</tr>
<tr>
<td></td>
<td>Scheduled for development under DPD</td>
</tr>
<tr>
<td></td>
<td>Views: Urban park, some trees, intrusion by hospital etc</td>
</tr>
<tr>
<td>Barton Road Cricket Ground</td>
<td>Development pending, unusable</td>
</tr>
<tr>
<td></td>
<td>Views: Almost none</td>
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<tr>
<td>Bury Knowle Park</td>
<td>Good public space but suboptimally organised and far from Barton West and Northway although used by residents of Barton and Northway, little habitat in relation to size</td>
</tr>
<tr>
<td></td>
<td>Views: Urban Parkland</td>
</tr>
<tr>
<td>Northway Playing Fields</td>
<td>Blank featureless, devoid of wildlife – sport only</td>
</tr>
<tr>
<td></td>
<td>Views: None</td>
</tr>
<tr>
<td>Patch of green Barton Lane/A40</td>
<td>Very small, not useable, overlooking A40</td>
</tr>
<tr>
<td>Barton Lane Playground</td>
<td>Good playground and public space, but little wildlife habitats, too far for residents of Northway and Barton West</td>
</tr>
<tr>
<td></td>
<td>Views: Urban parkland</td>
</tr>
</tbody>
</table>

**Conservation Area Boundary**

Ruskin makes much of the artificial nature of the A40 as a boundary – this is incorrect on three basic counts:

- The A40 artificially REDUCES the the natural size of the Conservation Area, which could have extended to Bayswater Brook
- The presence of the A40 has had the effect of fossilising these fields in a pre 1930s, pre clearance and mechanisation size, with small fields with ancient hedgerows, and has CREATED and ENHANCED their conservation value as a Conservation Area is intended to do
- The A40 runs at the point broadly at which the Headington Hill slope becomes the Bayswater Brook alluvial plain it is therefore a natural boundary for the Conservation Area and village ambit.
Views
Views – The Value

The views offered of Ruskin Fields represent the LAST view of English Countryside that can be enjoyed by the residents of the suburbs of Barton, Barton West, Northway and Headington within an evening’s walk of their homes.

The views of green space in the Conservation Area are limited as indicated in table above in green space section.

There are views into the Conservation Area over Ruskin Fields from many points North of the A40. Should the proposed conversion of the A40 to a boulevard goes ahead, the view from this location will be more important than it currently is.
Views - Ruskin Report Debunked

It is useful to compare the viewlines identified by the 2nd Draft of the Conservation Area Appraisal with the Ruskin Report.

The former shows the most significant view lines (black arrows) being from the Stoke Place footpath to and over the Northern fields development site to Elsfield hill beyond yet the later shows the only significant view lines in the area as being from a point which is inaccessible private property and far from Ruskin fields. Please refer to Ruskin Report, Fig 8, (p7) (red arrows on map)
Stoke Place Bridleway – Two Contrasting Views

Typical View of Stoke Place Green Lane at nearest point to development

The Ruskin Report presents only two photographs of the Stoke Place bridleway the first and most prominent of which (p3) is:

- At a point 150 metres away from the proposed development
- Not greatly affected by the proposed development
- A typical, if attractive street with vehicular access

A much smaller image on (p13) does not present the bridleway in its full glory, but does show clearly the footpath across the fields bearing to the left from the hole in the fence.

Clearly, the visual imagery does not fully reflect the conservation and amenity value of the Stoke Place bridleway.

The assertion that:

"The private character of these pastures and the presence of the Northern Bypass as a strong barrier to movement reinforces their secluded character and restricts the creation of significant interrelationships or key views and vistas in and out of the conservation area (sections 4.11 and 4.12)."
Is incorrect both on the grounds of public access, and the most significant and accessible views in the area are into and over the Ruskin Fields development site, which will be destroyed.

“The visual impact of the development of the northern field will undoubtedly have an effect on the visual amenity of certain receptors, in particular, those houses and footpaths, which overlook the northern site.”

The view from the Stoke Place footpath has high value as it is the only publically accessible full view of a pastoral landscape available to the city dweller.

As can been seen by the Conservation Area assessment, the development will totally destroy the only rural vista available to the city.

The Southern Field Retention Case – Ruskin Debunked

“Means to reduce this impact include the retention of the southern field as a landscape and visual buffer with supplementary planting which will act as a visual screen. This may well result in substantial reduction of any visual impact.”

The only field (which will become an amenity area and lose its rural charm) that Ruskin intends to retain is the Southern one near the College, however:

- The field is almost invisible from Stoke Place footpath due to the embankment and wall
- Access will be limited by Ruskin, and given the concerns expressed regarding trespassers and student and staff health and safety by the Principal of Ruskin, it is safe to assume access by the public access will be severely restricted in an area immediately adjacent to the College
- The amenity area leads nowhere – The Northern fields development site allow residents of Northway and Barton West a pleasant walk on a rational route to the shops.
- Ruskin have planted holly bushes to block the view from Stoke Place to the countryside, this will represent an impairment of one of the most important views in the area.

Important View Loss v. Irrelevant View Loss Treatment

The large section and diagram in the Ruskin Report (p20) devoted to the view from the top of the Crinkle Crankle wall available only the Ruskin, which will be minimally impacted, and the almost total absence of discussion regarding the severe impact of the removal of the views of the fields and countryside is not proportionate.

“This can be seen on the cross section below. The cross section shows the heights within the site that would be viewed from someone standing at the height of the crinkle crankle wall. The distance between ground level and the person’s line of sight part of the way down the site towards the A40 would be 9.7 metres.

By the time the ground level reaches the A40 itself the distance would be 13.5 metres. This shows that it would therefore be possible for views to be maintained from the upper areas of the site and surroundings.”

And:
"By placing the development to the far north and towards the west of the site the natural slope ensures that views will be maintained."

It is only true for Ruskin College staff and students standing on top of the Crinkle Crankle wall, the same view will have been totally destroyed for ordinary people coming from Northway and Barton West.

The view would be of rooftops, with countryside only visible in the far distance, rather than immediately from the wall.
The Case for A Town Green and Traditional Use Footpath

Historical Context

Medieval villages had core and a “three field” arable agricultural system (in this case four), and a village green or common where pasture (eg meadow) and water was available. As can be seen below, Headington was typical in this respect.

As the water and meadow for Headington (possibly Hill Town) is located at the bottom of the hill sloping down to Bayswater Brook (shown as “Wash Brook” below), the common land was there, and is marked below as “The Meadow and Hengrove Common” where Ruskin Fields now are.

Historical Context - Ruskin Report Debunked

In Historical Context, (p9) It makes no mention of any history from Roman times to post enclosure times, although this land use pattern above existed for 1000s of years until Enclosure in the 1830-40s, which enabled the wealthy influential people to sequester previously public land - which is unfavourable to the development proposal.

This proves they have had and have an historical function as an integral part of the village.

The rather obscure argument that the fields’ ownership may not have been entirely related to the Rookery at all periods in history is not relevant. They are clearly intimately related to The Rookery and its predecessors, and are in the curtilage of two listed buildings - The Rookery, and more closely, the crinkle-crankle wall.
Current Use As Village Green and Path

Under various legislation including the Countryside and Rights of Way Act 2000, it is possible for land to become a village green if it has been used for twenty years without force, secrecy or permission \((\text{nec vi, nec clam, nec precario})\).

The ownership of the land is also not of relevance in this context.

Citizens from the communities of Northway, Barton and Headington have used this land for walking, blackberry picking and for children to play.

The existence of a path across these fields attests to this usage – no permission was given, and no force was required as at the Foxwell Drive end the path was wholly unrestricted by any barrier, and there is no barrier at the entrance of Stoke Place which is owned by Ruskin College. The very low walls, particularly at the south end of the field adjacent to Stoke Place and ajar gate are barriers of the same height as a ordinary stile.

The clear evidence of a path is included here and supported by the image in the Ruskin Report of Stoke Place (p18) which shows the footpath bearing off to the left across the fields.
Foxwell Drive Path Entrance – No Fencing or other restriction in place until June 2011
Town Green - Ruskin Report Debunked

As can be seen from above, the assertion by Ruskin:

"Taking this point further, Ruskin Fields have played no part in the plan form of Old Headington (section 4.7) or in its origins or historic development (section 4.9)."

is almost certainly incorrect.

Ruskin Report Statement Appears To Support Public Use Of Land

Ruskin has admitted the existence and use of the path by members of the general public (p17):

"Ruskin Fields are not currently used by Ruskin College, other than staff and students walking across them from time to time."

Unless they are bonded labourers, on their way to work or study they are private citizens until such time as they commence their working or study day, so, in effect Ruskin appears to support the claim for a town green or at least the existence of a traditional footway which has existed for over 20 years.

It is also missed out in "Urban Design Context" Figure 2, (p4) which purports to show via the blue lines/green dots the "key routes/paths" in use.
Legal And Policy Framework

Creation of Precedent – A Development Enabler

If the Ruskin development is permitted, then it creates both a local precedent that all green fields on the South side of the A40 in the Conservation Area can be developed, and more generally that if green space in a Conservation Area cannot be protected, then nothing can, therefore Conservation Area protection and green field status has no further meaning at Oxford City Council.

This is a material consideration as per eg “Collis Radio Ltd v. Secretary of State for the Environment” and other cases that have held that particular developments may not proceed as they would create an unfavourable precedent. (12.78)

The issue of whether the other owners wish it is however not, as they may change, or the Oxford City Council will use its compulsory purchase powers as signalled in the Core Strategy.

Natural Justice

It is not natural justice for Ruskin to present its case for a total of five years without vigorous attempts to seek the opinions of the communities that surround the fields, and give the public only a total of six weeks to comment on it before a land allocation policy decision is made, Oxford City Council should not “listen to one party behind the back of another” (19.17)

This principle has legal force in the period between the LPA (ie Oxford City Council) final planning decision and the decision by the Planning Inspector, I see no reason why the same principle does not apply to the initial proposals and site policy formation.

Old Headington Conservation Area

A designated heritage asset is according to PPS5:

DESIGNATED HERITAGE ASSET
A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated as such under the relevant legislation.

Ruskin Fields Are Part Of a Designated Heritage Asset

This means that Ruskin Fields are NOT the surroundings of a Designated Heritage Asset, they ARE a part of the Designated Heritage Asset, ie the Conservation Area.

Presumption Against Development of Designated Heritage Assets

In contrast to the usual presumption in favour of development, in relation to a Designated Heritage Asset HE9.1 states there is a presumption AGAINST development.

HE 9 concerns policies relevant to designated heritage assets and goes on:
HE9.1 There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

Development can only proceed once Oxford City Council removes the Conservation Area protection for this part of the Conservation Area – something it must do subsequent to development as there will be nothing left to preserve.

The following statements speak for themselves:

**PPS1 – Planning for Sustainable Development**

**Key Principles - Protection and Enhancement of the Environment**

17. The Government is committed to protecting and enhancing the quality of the natural and historic environment, in both rural and urban areas. Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole. A high level of protection should be given to most valued townscapes and landscapes, wildlife habitats and natural resources.

**PPS5 – Planning for the Historical Environment**

"HE7.5 Local planning authorities should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use."

It is significant the 1998 extension of The Old Headington Conservation Area was essentially only for the green fields.

**PPS7 – Rural England National Policy Objectives**

(iv) New building development in the open countryside away from existing settlements, or outside areas allocated for development in development plans, should be strictly controlled; the Government's overall aim is to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and so it may be enjoyed by all.

**Conservation Areas**

Designated under the Planning (Listed Buildings and Conservation Areas) Act 1990, primarily by local authorities, for their special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.

**Natural Environment White Paper**

The recently Natural Environment White Paper includes proposals to give communities new powers to designate protected green areas as part of local neighbourhood plans.
Oxford Poor Conservation Policy Criticised as a Matter of Public Record

In the final Planning Inspectors’ Report on the Core Strategy on 21 December 2010 the following statements are of note:

"The built environment – Policy CS19

4.107

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SHLAA - Oxford City Council Rejected Ruskin Fields Development

Oxford City Council formally rejected Ruskin’s SHLAA (Strategic Housing Land Assessment) submission as follows in 2008:

"Close to A40 so noise could be an issue. Unsuitable. Development of the site would destroy the openness surrounding Old Headington and significantly affect the setting of the Conservation Area"

As stated above, it is not the setting of the Conservation Area, it IS the Conservation Area.

Legal Framework - Ruskin Report Debunked

Ruskin Appears to Apply Wrong Conservation Policy Guideline

On p11 the Ruskin Report states:

“For the effect of development on the significance of any heritage asset to be a “material consideration”, PPSS at paragraph HE8.1 requires that local planning authorities are clear that any asset meets the heritage asset criteria set out in Annex 2.”

However 8.1 does NOT apply as it is contained in HE8 which is entitled in PPSS:

“Policy HE8: Additional policy principle guiding the consideration of applications for consent relating to heritage assets that are not covered by policy HE 9”
HE9 in turn is entitled:

“Policy HE9: Additional policy principles guiding the consideration of applications for consent relating to designated heritage assets”

Which as pointed out above, include Conservation Areas.

Therefore 8.1 does NOT apply as the application concerns part of a designated heritage asset.

The Ruskin Report attempt to claim the fields are not even a heritage asset is, given that they are part of designated heritage asset is therefore demonstrably incorrect.

Core Strategy CS8 Does Not Apply To Ruskin Fields

When the final version of the Core Strategy was ratified, the Barton AAP area was clearly defined as being the Barton area North of the A40 as the Planning Inspectors final report stated the AAP area should be precisely defined. CS8 therefore only applies to the original Barton site.

If the Planning Inspector demanded an area be precisely defined to prevent the Core Strategy being unsound, changing it immediately after acceptance renders the Core Strategy unsound.

It appears the Ruskin Report is stating CS8 does apply:

“One of the documents being produced as part of the LDF is the Barton Area Action Plan (AAP). The policy within the Core Strategy relating to the Barton AAP is CS8. This document will set out how approximately 1000 new homes can be provided to the west of the existing Barton area and link in with and help regenerate and improve connections between the other local centres of Northway and Old Headington. As such the area covered by the Barton AAP will not only relate to the new housing, but also to these other areas.”

Policy CS18 Urban design, townscape character and the historic environment

“Development must not result in loss or damage to important historic features, or their settings, particularly those of national where these address local issues identified in, for example, conservation area character appraisal or management plans. Views of the skyline of the historic centre will be protected.”

The Ruskin Fields development cannot exist and not destroy the historical features or settings. As pointed above, out the Conservation Area is a Designated Heritage Asset, and Ruskin Fields are a part of that, not its setting.

Other Points

“We consider that this would be possible by developing only part of the site and using the natural contours to blend the development into the surrounding countryside.”

The part referred to appears to be approximately 80% of the Greenfield site in Ruskin’s ownership.

Community Engagement

“The College are actively engaging with the local community on this scheme.”
Prior to Jan 2011, approximately five years after Ruskin submitting the land as development land as part of the SHLAA, there appears to have been no communication with the community regarding this development.

**Development Scale In Relation To Barton West – 25% More**

The scale of the development will add very considerably to the Barton Project which is currently expected to have 822 homes, Ruskin wishes to build a further 193, or 25% more, adding significantly to the development pressures.

**Southern Field/Amenity Area Not Relevant**

The current development at Ruskin has no bearing on any future planning application, and it is therefore not possible to trade past supposed “enhancements” with new development on a far more destructive scale.
fao Oxford City Planning Department

BARTON AREA ACTION PLAN - Comments for Proposed Submission Document

Dear Sir or Madam
We attach 3 files for the proposed submission document on the paragraphs and policies:
Stoke Place
A40 Transformation
Foxwell Drive

Please contact us for any additional information.

Yours sincerely
Peter and Sue Shaw
**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 and Mrs P Shaw</th>
</tr>
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<tbody>
<tr>
<td>First name</td>
<td>Peter</td>
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<tr>
<td>Last name</td>
<td>Shaw</td>
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<td>Postcode</td>
<td>OX3</td>
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<tr>
<td>Telephone number</td>
<td></td>
</tr>
<tr>
<td>Email address (USE CAPITALS)</td>
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*Client name and organisation (where relevant)*

<table>
<thead>
<tr>
<th>Signature:</th>
<th>Peter and Sue Shaw</th>
<th>Date:</th>
<th>18 March 2012</th>
</tr>
</thead>
</table>

**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: Barton AAP PS Comment Form-122/03/2012
Part A
continued

<table>
<thead>
<tr>
<th>Do you wish to speak at the examination hearings?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No, I do not wish to speak</td>
</tr>
</tbody>
</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.

<table>
<thead>
<tr>
<th>Do you wish to be notified of the following? (tick as appropriate)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The submission of the Sites and Housing Development Plan Document</td>
</tr>
<tr>
<td>The publication of the inspector’s report</td>
</tr>
<tr>
<td>The adoption of the Sites and Housing Development Plan Document</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](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: planning.policy@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.

| Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number) |
|---|---|---|---|---|
| Paragraph | 5.5 | Policy | BA1 | Proposals map | Sustainability appraisal |

| 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? | Not effective |

© 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. |

Transforming the ring road

Integration with Barton is a praiseworthy aim but:
We oppose the re-landscaping of the A40 central reservation because:
For Barton, Northway and Headington the trees provide some protection from vehicle noise and light and also absorb pollutants

Removal of trees and bushes injures wildlife trackways.
(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.

(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.
Notes on completing Part B

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></td>
<td></td>
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<tr>
<td>- Provide evidence of community participation in its production</td>
<td></td>
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<tr>
<td>- be backed up by facts;</td>
<td></td>
<td></td>
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<tr>
<td>- offer the most appropriate strategy when compared with reasonable alternatives; and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- show how the policies are sustainable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The policies should be deliverable, and the document should:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- include plans for providing supporting infrastructure;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- face no barriers to delivery in the form of regulations or national planning law;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- identify partners who will help deliver it;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- fit in with the strategies of neighbouring authorities;</td>
<td></td>
<td></td>
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<tr>
<td>- be flexible enough to adapt to changing circumstances; and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- allow monitoring against targets linked to the Annual Monitoring Report(^9).</td>
<td></td>
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</tr>
<tr>
<td>Where the DPD differs from national policy, there must be clear and convincing reasons to justify the difference.</td>
<td></td>
<td></td>
</tr>
<tr>
<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>
<td></td>
<td></td>
</tr>
<tr>
<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>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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>
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<tbody>
<tr>
<td>Paragraph</td>
</tr>
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</table>

<table>
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<tr>
<th>Q2. Do you consider that the document is:</th>
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</thead>
<tbody>
<tr>
<td>(a) legally compliant?</td>
</tr>
<tr>
<td>(b) sound?</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?</td>
</tr>
<tr>
<td>(b) effective?</td>
</tr>
<tr>
<td>(c) consistent with national policy?</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. |
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.

**Crossing point from Barton West to Northway**
We consider the proposed crossing point across the busy A40 impracticable and therefore unsound.
(Pedestrian crossing assumed)

**Connection to the City cycle track**
- We support the creation of a cycle way from the existing A40 cycle track, through the hedge, across the narrow strip of grass and onto Foxwell Drive.
- There is already a hedge gap approx 50m from the Stoke Place/A40 junction; there is also an existing concrete ramp through the hedge gap from the A40 cycle track.
- This route is less steep than Stoke Place.
- Cycle movement can then proceed to the JR Hospital bus gate via Saxon Way and also onto Northway and Marston.
- It also offers an auxiliary route into Headington by using the lightly used border/pavement next to Dunstan park.

(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

Public Profile

Name  John Chesworth
Email  [redacted]

http://consultation.oxford.gov.uk/consult.ti/BartonAAP/viewMember?uid=3945345&...  27/03/2012
Private Profile

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

Postal Address
Barton
Headington

Postcode
OX3

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

Postal Address
Barton
Headington

Postcode
OX3

Preferred Contact Method
Email

Block Postal Contact
No

Block Email Contact
No

Actions

Return to the previous page

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**View Representation**

**Representation Information**

<table>
<thead>
<tr>
<th>Structured Document</th>
<th>Barton Area Action Plan (Proposed Submission Document)</th>
<th>Section 3 Objectives</th>
<th>Content</th>
<th>[List all representations on this structured document part]</th>
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<td>John Chesworth</td>
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<tr>
<td>Response Date</td>
<td>22 Mar 2012</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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<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 Legally Compliant?</td>
<td>No</td>
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<tr>
<td>Do you consider the DPD is Sound?</td>
<td>No</td>
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<tr>
<td>On which grounds do you consider the DPD unsafe? (if applicable)</td>
<td>Not Effective</td>
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<tr>
<td>Details of why you think the DPD is unsound</td>
<td>The legal compliance is impossible to know.</td>
<td></td>
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</tr>
<tr>
<td>What changes do you suggest to make the DPD legally compliant or sound?</td>
<td>The first issue that concerns me is the traffic flow within the existing road network. The link road - North Way - that runs parallel to the ring road from Buxher Avenue to the top of Barton Village Road is too narrow to allow two way traffic, including buses. Will a one way system be adopted to alleviate the situation? The second issue concerns traffic coming from the new development cannot be readily be prevented from exiting through Fettiplace Road or Barton Village Road leading to the likelihood of a 'rat run' through the estate. This could be prevented by making the link road between the new development and existing estate a bus and emergency vehicle access route only. At present access to the Green Road roundabout can take up to 20 minutes at peak times, this will be exacerbated by the increase in vehicle numbers. It is far from clear from the proposals so far made public that any of these issues have been addressed,</td>
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**Submission Method**

- Web

Modify  Delete  Back

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Consultation

Barton Area Action Plan (Proposed Submission Document)
### 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

**Representation ID**
75 RBS8/2 BA3/2

**Respondent**
John Chesworth

**Response Date**
22 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)**
BA3

**Do you consider the DPD is Legally Compliant?**
No

**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**
The council appears to have restricted the use of the upper area of the allotments over the past few years. Which conveniently allows them to state that they are not reducing the area of active allotments and to push a road through the area.

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

**Submission Method**
Web

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Consultation

Barton Area Action Plan (Proposed Submission Document)
View Representation

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<td><strong>Response Date</strong></td>
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<tr>
<td><strong>Which paragraph do you wish</strong>&lt;br&gt;to comment on? (please give relevant paragraph number)**</td>
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<tr>
<td><strong>Which policy do you wish to comment on? (please give the relevant policy number)</strong></td>
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<tr>
<td><strong>Do you consider the DPD is Legally Compliant?</strong></td>
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<td><strong>Do you consider the DPD is Sound?</strong></td>
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<td><strong>On which grounds do you consider the DPD unsound?</strong>&lt;br&gt;(if applicable)</td>
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<td><strong>Details of why you think the DPD is unsound?</strong></td>
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Consultation

Barton Area Action Plan (Proposed Submission Document)
### 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**: 78
**Respondent**: John Chesworth  
[List all representations by this respondent](#)

**Response Date**: 22 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)**
**BA4**

**Do you consider the DPD is Legally Compliant?**: No

**Do you consider the DPD is Sound?**: No

**On which grounds do you consider the DPD unsound? (if applicable)**
**Details of why you think the DPD is unsound**
**Not Justified**

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

The building of an access road through the nature reserve is both ecologically disturbing as well as increasing the danger to pedestrians. It also significantly reduces the amount of accessible green space for inhabitants both human and animals. The wildlife habitat is different from that of the brook side and the wild-life is unlikely to transfer itself.

**Submission Method**: Web

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Barton Area Action Plan (Proposed Submission Document)
View Representation

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<tr>
<td>Do you consider the DPD is Legally Compliant?</td>
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<td>Do you consider the DPD is Sound?</td>
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<tr>
<td>On which grounds do you consider the DPD unsound? (if applicable)</td>
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<tr>
<td>Details of why you think the DPD is unsound</td>
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<tr>
<td>What changes do you suggest to make the DPD legally compliant or sound?</td>
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Barton Area Action Plan (Proposed Submission Document)
**View Representation**

**Representation Information**

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<th>Barton Area Action Plan (Proposed Submission Document) Section 6 A vibrant, vital, inclusive and mixed new community Affordable housing Content</th>
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<tr>
<td>Representation ID</td>
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<tr>
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<td>Which paragraph do you wish to comment on? (please give relevant paragraph number)</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 Legally Compliant?</td>
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<td>On which grounds do you consider the DPD unsound? (if applicable)</td>
<td>Not Justified</td>
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<tr>
<td>Details of why you think the DPD is unsound</td>
<td></td>
</tr>
<tr>
<td>What changes do you suggest to make the DPD legally compliant or sound?</td>
<td>The reduction of the proportion of Affordable Housing from the initially stated 50% to 40% seems to be inappropriate and to be driven by the interests of the developers, rather than the needs of the residents.</td>
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<td>Submission Method</td>
<td>Web</td>
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http://consultation.oxford.gov.uk/consult.ti/BartonAAP/manageViewRepresentation?r...  27/03/2012
Consultation

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Consultation

Barton Area Action Plan (Proposed Submission Document)
View Representation

Representation Information

Structured Document: Barton Area Action Plan (Proposed Submission Document)
Integration with surrounding areas and the rest of Oxford
Vehicle access

Representation ID: 84
Respondent: John Chesworth
Response Date: 22 Mar 2012

Which paragraph do you wish to comment on? (please give relevant paragraph number)
5.6

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

Do you consider the DPD is Legally Compliant?
No

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
The first issue that concerns me is the traffic flow within the existing road network. The link road - North Way - that runs parallel to the ring road from Burchester Avenue to the top of Barton Village Road is too narrow to allow two way traffic, including buses. Will a one way system system be adopted to alleviate the situation?
The second issue concerns traffic coming from the new development cannot be readily be prevented from exiting through Fettiplace Road or Barton Village Road leading to the likelihood of a 'rat run' through the estate. This could be prevented by making the link road between the new development and existing estate a bus and emergency vehicle access route only.
At present access to the Green Road roundabout can take up to 20 minutes at peak times, this will be exacerbated by the increase in vehicle numbers.
It is far from clear from the proposals so far made public that any of these issues have been addressed,

Submission Method: Web

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Consultation

Barton Area Action Plan (Proposed Submission Document)
**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.

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<td>Address line 1</td>
<td></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>OX3</td>
</tr>
<tr>
<td>Telephone number</td>
<td></td>
</tr>
<tr>
<td>Email address (USE CAPITALS)</td>
<td></td>
</tr>
<tr>
<td><em>Client name and organisation (where relevant)</em></td>
<td></td>
</tr>
</tbody>
</table>

**Signature:** C P Taylor  
**Date:** 22 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: ☐
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 |  |
| The publication of the inspector’s report | yes |
| The adoption of the Barton Area Action Plan Document | yes |

**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.

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>2.2</th>
<th>Policy</th>
<th>BA1</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? X
(b) effective? X
(c) consistent with national policy? X
(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.

Policy 2.2 is misguided and needs adjustment. The opening of the ring road to hedgerow and/or tree removal is unhelpful for environmental reasons (shrubs and trees are needed to line the ring road to help absorb pollutants emitted by vehicles using the ring road, to absorb noise emitted by such vehicles so that adjacent areas some of which are anticipated will provide domestic housing, and to visually screen the ring road from people and housing nearby).
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.

Natural screening of the ring road should be retained so that no measure of vehicle pollutants at 15m from the ring road exceed that of the year 2010 levels.
Notes on completing Part B

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>
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<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>
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<td>- offer the most appropriate strategy when compared with reasonable alternatives; and</td>
<td>- identify partners who will help deliver it;</td>
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</tr>
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<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>
</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/pps12sp (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

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.
WYATT Richard

From: Neil Clennell [neilclennell@bbowt.org.uk]
Posted At: 22 March 2012 14:40
Conversation: Barton AAP proposed submission
Posted To: planningpolicy@oxford.gov.uk
Subject: Barton AAP proposed submission RAW Printed

Please find attached the Trust’s response to the Barton AAP consultation.

Regards,

Neil Clennell
Senior Conservation Officer (Oxfordshire)
Berks, Bucks & Oxon Wildlife Trust
☎ 01865 775476
✉ The Lodge, 1 Armstrong Road, Littlemore, Oxford, OX4 4XT

Join us today: www.bbowt.org.uk

Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust. Registered Office: The Lodge, 1 Armstrong Road, Littlemore, Oxford, OX4 4XT. Registered Charity No. 204330. A company limited by guarantee and registered in England No. 680007. Unless expressly stated otherwise, this message is confidential and may be privileged. It is intended for the addressee(s) only. Access to this e-mail by anyone else is unauthorised. If you are not an addressee, any disclosure or copying of the contents of this e-mail or any action taken (or not taken) in reliance on it is unauthorised and may be unlawful. If you are not an addressee, please inform the sender immediately. You should carry out your own virus checks before opening any attachment.

22/03/2012
Planning Policy Team
Oxford City Council
St. Aldate’s Chambers
109-113 St Aldate’s
Oxford
OX1 1DS

22nd March 2012

By email

Dear Sirs,

Re: Barton Area Action Plan: Proposed Submission Document

Thank you for consulting the Berks, Bucks & Oxon Wildlife Trust (BBOWT) on the above Development Plan Document. Further to our responses to earlier rounds of consultation, I would submit the following observations on the current Barton AAP Proposed Submission Document. I offer comments on three specific policies in the reverse order that they appear in the AAP, for reasons of explanation that I hope are apparent.

Policy BA19: Sidling’s Copse and College Pond SSSI

The Trust greatly welcomes the inclusion of this policy following constructive discussions between the City Council, BBOWT and Natural England. The policy is designed to ensure that the SSSI is safeguarded from any adverse impacts on the valuable ecological features for which it was originally designated (and continues to be actively managed to preserve by the Trust) that may arise from the large-scale development proposed nearby at Barton.

I agree that the inclusion within the scheme design of "plenty of attractive and continuous natural green space and a variety of appropriate wildlife habitats will help provide an alternative to recreational use of the SSSI". I think that the overall extent and vision of alternative green space within the AAP boundary will be the key to whether this approach alone will achieve the aims of avoiding significant additional pressure on Sidling’s Copse. If it lacks ambition, it may prove that some influence on land management practices beyond the site boundary, additional signage and interpretive material, or other measures may also be required. However, BBOWT will be pleased to continue working constructively with the City Council, Natural England and a site developer to achieve compliance with Policy BA19.

Policy BA14: Delivery

I support the requirement for a phasing strategy to be submitted with an outline planning application to ensure that the scheme would create a sustainable community from the outset. This should also include the provision of the green infrastructure and wildlife habitats to be designed into the scheme referred to in Policy BA19. It is important that any phasing requirements do not compromise a holistic approach to natural green space creation throughout the development, as
this may be expected to significantly contribute to a strategy to avoid damage to Sidling’s Copse SSSI.

I also welcome that the policy recognises the need for Section 106 contributions to cover the cost of on-site biodiversity infrastructure, but note that any necessary biodiversity compensation is not included in those off-site infrastructure requirements listed to be covered by either an adopted Community Infrastructure Levy DPD or further Section 106 contributions if CIL is unavailable. As some form of off-site biodiversity enhancement may need to be negotiated to ensure compliance with Policy BA19, it would be useful to include this in Policy BA14.

**Policy BA4: Public Open Space**

With regard to Public Open Space, I would support the comments of Natural England, and those made by the County Council’s Ecologist Planner in response to a scoping opinion at the end of 2011. Given the need for the strategic development site to provide realistic and viable natural green space alternatives to new residents for the reasons explained in Policy BA19 of the AAP, the “at least 10%” Public Open Space proposed in Policy BA4 seems an unambitious minimum target. Furthermore, the City Council Core Strategy green space target of 5.75ha per 1000 residents is difficult to reconcile with the proposed minimum. Although the 5.75ha/1000 is a strategic city target, a once in a generation increase in housing supply of the magnitude proposed at Barton adjacent to the city boundary should aspire to achieving more than what equates to approximately one quarter of this target. Some clarification of how the open spaces proposed within the scheme relate to both land area, per capita allocation of new residents, and biodiversity provision would be useful.

I hope that these comments are helpful to the consultation process. Should you wish to further discuss any of the matters raised, please do not hesitate to get in touch.

Yours sincerely,

Neil Clennell
Senior Conservation Officer (Oxfordshire)
neilclennell@bbowt.org.uk
# Barton

## Area Action Plan

Comment Form for Proposed Submission Document

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### 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>MR</th>
</tr>
</thead>
<tbody>
<tr>
<td>First name</td>
<td>David</td>
</tr>
<tr>
<td>Last name</td>
<td>Melling BS</td>
</tr>
<tr>
<td>Job title (where relevant)</td>
<td>P. T. S.</td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td>South Central Ambulance Service</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>
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<td>OX3</td>
</tr>
<tr>
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<td>[Redacted]</td>
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<tr>
<td>Email address (USE CAPITALS)</td>
<td></td>
</tr>
</tbody>
</table>

*Client name and organisation (where relevant)*

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**Signature:** [Redacted]  
**Date:** 20/3/12

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**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: [ ]
**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.*

*I live 100 yards from proposed built. I think its obvious why I would speak out. ??*

*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 |  ✔   |

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      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>
</thead>
<tbody>
<tr>
<td>Paragraph</td>
</tr>
<tr>
<td>------------</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Q2. Do you consider that the document is:</th>
</tr>
</thead>
<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?</td>
</tr>
<tr>
<td>(b) effective?</td>
</tr>
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<table>
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<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>
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</table>

DUE TO THE COUNCIL'S RELUCTANCE TO BE UPFRONT WITH BARTON RESIDENTS I.E. PHONE NO ON BACK OF THIS FORM IS DEAD.  
ALSO, ON LINE FORMS TO FILL IN A READ TAKEN OFF LINE W/E 17-18 MARCH 2012

I REFUSE TO COMMENT AS I FEAR ANY COMMENTS WILL LIKE THIS DOCUMENT NOT BE MADE AVAILABLE

THE COUNCIL ARE NOT BEING TRANSPARENT WITH BARTON RESIDENTS. I GREATLY FEAR THIS BUILD WILL BE PUSHED THROUGH REGARDLESS OF OUR WISHES. I HAVE LITTLE FAITH IN OX CITY COUNCILLORS TAKING OUR CONCERNS SERIOUSLY, WITH TARGETS BY GOVERNMENT AND MONEY THERE ONLY CONCERNS.
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 council need to be totally open with residents of Barton, we are only shown the potential benefits if any, no time scales of built, and the obvious serious disruption to the local area, i.e., noise, numerous lorries, and road structure already struggling here alone a new built.

We have had little or no knowledge of what is happening, especially for those in immediate area, Barton Village Rd, Howgrove Close, Ferrer Place Rd.

The out and out lies by council need to be addressed i.e., there are no bats in area but, if they do a survey which they did in 2010 or 2011 bats hibernate until April, you cannot build if bats are in area, they are a protected species.

We want an open transparent meeting and forms, not a one way we are going ahead regardless. As residents we are fuming with.

CIC City Council

(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.
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.

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- complies with the **LEGAL REQUIREMENTS**; and
- is **SOUND**

**LEGAL REQUIREMENTS**
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- 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:

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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
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- supported your comment with evidence showing why the document should be changed; and
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  comment and the suggested change, as there will not normally be a later opportunity to
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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

Useful links
- The Planning and Compulsory Purchase Act 2004:
- Local Development Scheme; Statement of Community Involvement; Sustainability Appraisal; Annual
  Monitoring Report: http://www.oxford.gov.uk/PageRender/deCP/Planning_Policy_occw.htm
- South East Plan:
  /regionalPlanning/815640/
- Sustainable Community Strategies: http://www.oxfordpartnership.org.uk/sustainable.asp;
  http://www.oxfordshirepartnership.org.uk/wps/wcm/connect/occ/OxfordshirePartnership/Home/
- 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:
planning policy@oxford.gov.uk

01865 252847

---

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10 Plans for the local area that are prepared by the Local Strategic Partnerships.
11 Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning.
12 This monitors progress towards delivery of plans and policies.
From: Mavis Curtis
Posted At: 22 March 2012 23:23
Conversation: Barton housing development
Posted To: planningpolicy@oxford.gov.uk
Subject: Barton housing development LG Printed

Please find attached our comments on Barton AAP. F.S and M Curtis
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 and Dr

First name
Stuart and Mavis

Last name
Curtis

Job title (where relevant)

Organisation (where relevant)

Address line 1

Address line 2

Address line 3
Oxford

Address line 4

Postcode
OX3

Telephone number

Email address (USE CAPITALS)

*Client name and organisation
(where relevant)

Signature: F.S.Curtis, Mavis Curtis

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?

| 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
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- 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**

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or return the comments form by email or post:

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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)

<table>
<thead>
<tr>
<th>Paragraph</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 [X]  
(b) sound? Yes [ ] No [X]

*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? [X]  
(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.

We consider that not enough thought has been given to the disruption to traffic that alterations to the A40 will cause. We envisage an increase in the number of vehicles driving through Elsfield to reach the B4027 because of the proposed speed restrictions, pedestrian crossings and extra roundabout. There is no footpath through the village and 23 children live alongside the road. There has been no consultation with the residents of this village, which is outside the city, but which will be seriously affected by the changes.
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.

(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.
Notes on completing Part B

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></td>
<td></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>• Provide evidence of community participation in its production</td>
<td>• Include plans for providing supporting infrastructure;</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>• be backed up by facts;</td>
<td>• face no barriers to delivery in the form of regulations or national planning law;</td>
<td></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(^9).</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/pps12isp (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

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.
From: Katherine Macdonald [Katherine.Macdonald@southandvale.gov.uk]
Posted At: 22 March 2012 16:46
Conversation: Sites and Housing DPD and Barton AAP consultations
Posted To: planningpolicy@oxford.gov.uk
Subject: Sites and Housing DPD and Barton AAP consultations

Dear Sir/Madam,

Please find attached South Oxfordshire District Council's response to the Sites and Housing DPD and Barton Area Action Plan. Please could you acknowledge receipt of these representations.

Kind regards

Katherine Macdonald

********************************************************************
The information contained in this transmission may be confidential and may also be the subject of legal professional privilege. If you are not the intended recipient, any use, disclosure or copying of any part of this transmission is unauthorised. If you have received this transmission in error, please notify the originator immediately.

www.southoxon.gov.uk

********************************************************************

PLEASE HELP US TO REDUCE WASTE BY ONLY PRINTING THIS EMAIL IF IT IS ABSOLUTELY NECESSARY.

This message has been scanned for viruses by BlackSpider MailControl
# 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>Field</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td>Mrs.</td>
</tr>
<tr>
<td>First name</td>
<td>Beryl</td>
</tr>
<tr>
<td>Last name</td>
<td>Guiver</td>
</tr>
<tr>
<td>Job title (where relevant)</td>
<td>Principal Planning Policy Officer</td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td>South Oxfordshire District Council</td>
</tr>
<tr>
<td>Address line 1</td>
<td>Benson Lane</td>
</tr>
<tr>
<td>Address line 2</td>
<td>Crowmarsh Gifford</td>
</tr>
<tr>
<td>Address line 3</td>
<td>Wallingford</td>
</tr>
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<td>Address line 4</td>
<td></td>
</tr>
<tr>
<td>Postcode</td>
<td>OX10 8NJ</td>
</tr>
<tr>
<td>Telephone number</td>
<td>01491 823723</td>
</tr>
<tr>
<td>Email address (USE CAPITALS)</td>
<td><a href="mailto:BERYL.GUIVER@SOUTHANDVALE.GOV.UK">BERYL.GUIVER@SOUTHANDVALE.GOV.UK</a></td>
</tr>
</tbody>
</table>

\*Client name and organisation (where relevant)

Signature: ___________________________ Date: 22.03.2012

**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>
<tbody>
<tr>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>

If you answered Yes, please outline why you wish to speak*.
To ensure that the duty to cooperate is fulfilled.

*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 | ✓ |
| The publication of the inspector’s report | ✓ |
| 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.

When completing the form, please:
- use a separate sheet (Part B) for each comment
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      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.

<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>
</thead>
<tbody>
<tr>
<td>Paragraph</td>
</tr>
<tr>
<td>-----------</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Q2. Do you consider that the document is:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) legally compliant?</td>
</tr>
<tr>
<td>(b) sound?</td>
</tr>
</tbody>
</table>

If you have entered No to (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?</td>
</tr>
<tr>
<td>(b) effective?</td>
</tr>
<tr>
<td>(c) consistent with national policy?</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>Sidlings Copse and College Pond SSSI is within South Oxfordshire. South Oxfordshire District Council is concerned that the proposed link to the footpath route through the SSSI will be likely to result in damage to the SSSI and would prefer that this link is removed. PPS9 paragraph 8 suggests that permission should not be granted where development would have an adverse effect on an SSSI except in special circumstances. This council’s own core strategy policy CSB1, shown below, reflects the wording in PPS9.</td>
</tr>
</tbody>
</table>

**South Oxfordshire Core Strategy Policy CSB1 Conservation and improvement of biodiversity**

A net loss of biodiversity will be avoided, and opportunities to achieve a net gain across the district will be actively sought.

Opportunities for biodiversity gain, including the connection of sites, large-scale habitat restoration, enhancement and habitat re-creation will be sought, with a focus on delivery in the Conservation Target Areas.

The highest level of protection will be given to sites and species of international nature conservation importance (Special Areas of Conservation and European Protected Species).

Damage to nationally important sites of special scientific interest, local wildlife sites, local nature reserves, priority habitats, protected or priority species and locally important geological sites will be avoided unless the importance of the development outweighs the harm and the loss can be mitigated to achieve a net gain in biodiversity.

If the footpath link is retained this council requests that proposals to avoid damage to the SSSI are
agreed with SODC before any application is submitted.

Footpath access to South Oxfordshire will require development in South Oxfordshire in order to construct the footbridges. Developers should be advised to discuss proposals with SODC prior to submission.

The John Radcliffe Hospital is the major A&E unit providing facilities for more serious accidents and emergencies for residents of a significant part of South Oxfordshire. The main route into the hospital is north along the ring road to the Marston junction. Parts of the district lie a significant distance from the hospital and journey times are crucial. South Oxfordshire District Council would be concerned if any proposals result in any increase in the time taken to reach the A&E unit in an emergency. We request that the impact of the road proposals on emergency journey times are investigated and the views of the ambulance service on the proposed road changes are sought.
Q3. 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 following changes to the document are requested:

Policy BA19 Sidlings Copse and College Pond SSSI
Delete and Add
Before the planning application is determined submitted the developer of the strategic site must submit to and reach agreement with South Oxfordshire District Council and the SSSI site owners on a plan for avoiding …

8.20
Sidlings Copse and College Pond SSSI is sensitive to increased recreational use. It is therefore important that the enhanced links to the countryside from the strategic development site do not result in damage to the SSSI. The developer must submit and agree with the South Oxfordshire District Council, City Council, Natural England and BBOWT a plan for avoiding any potential damage resulting from increased recreational pressure from the new development. Including plenty of attractive and continuous natural green space and a variety of appropriate wildlife habitats will help provide an alternative to recreational use of the SSSI. The linear park along Bayswater Brook, with links to other green areas within the site, will be important in the impact avoidance plan. The linear park should be designed and managed to minimise potential harm to the Sidlings Copse and College Pond SSSI.

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

This is the end of the comment form.
# 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>
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<tr>
<th>Title</th>
<th>Mrs.</th>
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<tbody>
<tr>
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<td>Beryl</td>
</tr>
<tr>
<td>Last name</td>
<td>Guiver</td>
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<tr>
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</tr>
</tbody>
</table>

*Client name and organisation (where relevant)*

| Signature: | Date: 22.03.2012 |

### 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

Do you wish to speak at the examination hearings?

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

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

To ensure that the duty to cooperate is fulfilled.

*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 | ✓ |
| The publication of the inspector’s report | ✓ |
| The adoption of the Barton Area Action Plan Document | ✓ |

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      Oxford
      OX1 1DS

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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)

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Section 5</th>
<th>Policy</th>
<th>BA 1 - 7</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.**

The plan is generally silent on relationships and working with neighbouring local authorities. South Oxfordshire Local Plan 2011 includes a relevant policy GB4, shown below, in relation to the Green Belt.

*South Oxfordshire Local Plan Policy GB4*

*Where new development is permitted, either within or where it would be conspicuous from the Green Belt, it should be designed and sited in such a way that’s its impact on the open nature, rural character and visual amenity of the Green Belt is minimised.*

This policy reflects the wording in paragraph 3.15 of PPG2. This council would like to see a section in the plan on working with partners and particularly neighbouring authorities and which refers to relevant policies. We would also wish to see the Green Belt shown on a plan in the document and a policy similar to that in the South Oxfordshire Local Plan included in the document. Most of the city council’s lengthy border with South Oxfordshire forms the boundary of the Green Belt.

*(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.

South Oxfordshire District Council would like to see some assessment in the plan of the impact on the Green belt of proposals adjoining or in close proximity to the Green Belt.

(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.
Dear Sir/Madam,

I am against "upgrading" of the lane & bridleway of Stoke Place. It is quite adequate as it is and the principal cycle/pedestrian route for the Barton extension should be Foxwell Drive which has little need or historic aspect to lose, unlike Stoke Place.

Yours faithfully,
WYATT Richard

From: [Redacted]
Posted At: 22 March 2012 15:13
Conversation: Barton Area Action Plan Proposals for Upgrading Stoke Place
Posted To: planningpolicy@oxford.gov.uk
Subject: Barton Area Action Plan Proposals for Upgrading Stoke Place

Please find attached comments:

Thank you

Rosie Butler
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
Miss

First name
Rosie

Last name
Butler

Job title (where relevant)

Organisation (where relevant)

Address line 1
Oxford

Address line 2

Address line 3

Address line 4

Postcode

Telephone number

Email address (USE CAPITALS)

*Client name and organisation
(where relevant)

Signature:  
Date: 22.03.12

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: [ ]
**Part A**

**Do you wish to speak at the examination hearings?**

| No, I do not wish to speak | 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)**

<table>
<thead>
<tr>
<th>The submission of the Barton Area Action Plan Document</th>
</tr>
</thead>
<tbody>
<tr>
<td>The publication of the inspector’s report</td>
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**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 | 5.33 | Policy BA7 | Yes | Proposals map | Sustainability appraisal |

| 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. |

**Stoke Place Bridleway**

I agree strongly to the following:

1. The Conservation Area Appraisal adopted in 2011 emphasized the importance of Stoke Place as one of Old Headington’s surviving rural lanes/key features/having special character. Council has to recognise that.
2. It is – they only have to look – an integral part of the village’s history and indeed was there before most of Old Headington was built.
3. The effects of ‘upgrading’ will destroy its essential character.
4. Standardizing, urbanizing, lighting will all erode the natural features, wildlife, and rural nature of the lane.
5. Stoke Place won’t become a safe and easy cycle link to the new development. It’s very steep in places, and has several flashpoints for collisions between cyclists, pedestrians and (in the upper section) cars.
6. With Ruskin’s new car-park (accessed via their service road) becoming operational in September vehicle traffic will increase dramatically. If cycle use increases too, safety will be seriously compromised.

Please keep this tranquil lane untouched! I cycle through this little piece of ‘sanctuary’ on a daily basis. For example in January I see snowdrops, February-March daffodils, April-May bluebells and garlic flowers. Full leaf in the summer.

There is no requirement to urbanize this little lane or urbanize it out of existence.
Perhaps the Oxford Preservation Society should be contacted?
There is a credible alternative: a footbridge between Foxwell Drive and the new development to function as the major cycle/pedestrian link. That would be more practical, safer, more environmentally sound. Stoke Place should be left as it is.

(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.

(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.
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:

### Be justified
Based on robust and credible evidence, the document should:

- Provide evidence of community participation in its production
- be backed up by facts;
- offer the most appropriate strategy when compared with reasonable alternatives; and
- show how the policies are sustainable.

### Be effective
The policies should be deliverable, and the document should:

- include plans for providing supporting infrastructure;
- face no barriers to delivery in the form of regulations or national planning law;
- identify partners who will help deliver it;
- fit in with the strategies of neighbouring authorities;
- be flexible enough to adapt to changing circumstances; and
- allow monitoring against targets linked to the Annual Monitoring Report.

### Be consistent with national policy
Where the DPD differs from national policy, there must be clear and convincing reasons to justify the difference.

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.

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.
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/pps12isp (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

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.