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
Title
First name
Georgina Ruth
Last name
Gibbs
Job title (where relevant)
Staff Nurse
Organisation (where relevant)
NHS Oxfordshire
Address line 1

Address line 2
Northway
Address line 3
Oxford
Address line 4

Postcode

Telephone number

Email address (USE CAPITALS)

*Client name and organisation (where relevant)

(Northway Residents Group Treasurer)

Signature: ____________________________ Date: 23/3/2012

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?

<table>
<thead>
<tr>
<th>No, I do not wish to speak</th>
<th>Yes, I wish to speak</th>
</tr>
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If you answered Yes, please outline why you wish to speak.*

I am a member of the Northway residents group and I would like to speak on behalf of my fellow residents. I would like to question the elements of the document.

*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
- 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>Policy</th>
<th>Proposals map</th>
<th>Sustainability appraisal</th>
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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.

See attached documents, regarding reasons why I think the BAAP Consultation (2014) is flawed.

1) e.g. the BAAP breaches the Environmental Protection Act of 1990. No Advisory, Headington or Barton are declared as being underprovided for greenspace - the Councils Greenpace strategy document. [Therefore these are going against their own policies, by using up these greenspaces]

2) Lack of adequate Consultation - for Consultation process, documents, e.g. 3rd round of consultation on document [Continue on a separate sheet or expand the box if necessary]
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
- 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:
- Sustainable Community Strategies: http://www.oxfordshirepartnership.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:
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.
Reasons for the Rejection of the Barton Area Action Plan

Barton Area Action Plan should be rejected on the grounds that it breaches the Statutory Noise Act 1993. This covers noise from individual vehicles (but not general traffic) ie the exhaust decibels noise output.

What constitutes statutory noise?
Defined as: either detrimental to a persons health, and/or it is interfering (or is likely to interfere) with, a persons own enjoyment of their land or property or both

That the Barton Area Action Plan breaches the:
Noise Act 1996
Has been amended by the Clean Neighbourhoods and Environment Act 2005 (CNEA).
Covers general traffic noise incorporated into legislation.
Aimed at preventing the quality of your environment being reduced through excessive noise, such as Ambulance sirens, set to roughly 120/135 decibels, and loud overly intrusive bus engines and exhaust noise, idling, vibration, rumbling axle vibration noise, road surface noise (tyre roar). Tyre vibration noise can be either a public or private nuisance at common law.

That the Barton Area Action Plan breaches:
The Environmental Protection Act 1990
Ultimately concerned with maintaining the quality of your immediate and surrounding environment, Foxwell Drive would be covered by this legislation.

That the Barton Area Action Plan breaches EU law, on Directive 2002/49/EC, the EU Environmental Noise Directive. As part of this Article 2.1 covers Hospitals, and the EU Environmental Noise Directive says, and specifies in fact, that outdoor night noise exposure should, on average, be no higher than 40 Decibels, and that is a maximum permissible level allowed.

The Barton Area Action Plan consultation Process is procedurally flawed, and breaches residents rights under Local Government Act 2000, on the grounds that it clearly states it is vital that they listen to the local community at grass roots level. They would appear to be acting contrary to both the spirit and letter of this legislation. The Local Government Act 2000 places great emphasis on the need for local government to improve the social well being of communities across the whole spectrum, including addressing the needs of teenagers, and young children, residing within the community in particular, you don’t exactly achieve this by robbing them of their green space, and this ties in with the Local Plan Policies SR2 and SR5 to do with open air sports facility provision. Robbing Northway children of a very large amount of the Green Space provision at Foxwell Drive is going against the Green Space Strategy Document, except that Fascist Oxford New Labour City Council don’t care.

And the fact that the Audit Commission report titled All Aboard slammed Public Transport, as being inflexible, costly and unreliable, and a generally all round sick joke. Plus the fact that Public Transport only carries 6% of the working population. And the fact that Public Transport consumes 60% more energy per person transported, therefore they cannot by any stretch of the imagination be classed as sustainable. Local Authorities have the power to make and enact Noise Abatement Areas under the Control of Pollution Act 1974, this power could potentially be used to shut down the Saxon Way bus entrance into the John Radcliffe Hospital, and cut off the buses from running up and down Saxon Way.

Residents of Saxon Way may be due recompense under the Land Compensation Act 1973, plus recompense under Noise Insulation Regulations 1975/1996, Local Councils have a legal duty to provide noise insulation, in all homes where traffic noise from new, and or significantly altered, roads exceeds the recommended levels. See the Department for Communities and Local Government publication entitled Reducing Adverse Effects of Public Development Mitigation Works, this can cover the fitting of 24mm Double Glazing for complete and total noise suppression.
Reasons for the Rejection of the Barton Area Action Plan

The fact that there is a report out which unequivocally states, that living with a view of green space is worth up to £300 pound per person per year.
The reason the residents of Northway don’t want Foxwell Drive harmed is because the trees along the green space protect the residents at night, from the glare of high wattage headlights and spot lamps mounted on Heavy Goods Vehicle cabs as they pass along the Northern Bypass.
The trees also act as a very effective noise barrier, softening, muting, muffling and attenuating the traffic noise from all classes of vehicles, passing in both directions along the Northern Bypass, lowering the decibel count by as much as 6 to 10 Decibels.
The trees and hedges along both sides of the Northern Bypass, and along the Central Reservation also help to guard high sided vehicles from cross winds blowing across the carriageways, and prevent build up of turbulence. The trees and hedges have important ecological and environmental tasks to perform, as well as looking attractive, they help to scrub, and lock up, airborne vehicular pollution from the local environment.

Because the Northern Bypass is screened from view, and you can’t see it from most of the houses along Foxwell Drive, house prices are fairly high, and helps to make the area more desirable. Opening up Foxwell Drive to Ambulances and Buses would cause significant harm to the local housing market, and would damage the local community adversely and irrevocably.
Reasons for the Rejection of the Barton Area Action Plan

In an Oxford Mail article dated 15th May 2009 by Giles Sheldrick, titled No Car Bridge Plan To Ease Barton Bottle Neck, David Rundle, Lib Dem Councillor for Headington Ward is quoted as saying: “What's on the table now would turn Northway into a through route without helping Barton”

Northway becoming a through route is something that the Friends of Old Headington do not want to see happen, as that would have a detrimental knock on effect for the roads through the old Headington Royal Borough Village, which already cannot cope with the traffic volume they have to deal with on a daily basis. Michael Crofton Briggs is quoted in the same newspaper article mentioned above, as having said “One of the key things we know about Barton is that it sits on the wrong side of the ring road and the City”. What he really means is that it is actually beyond the jurisdiction and purview of the City Council, as Barton is actually in the jurisdiction of South Oxfordshire District Council.

The Wayenefete Road side of Bayswater Road is in the area of responsibility of the Civil Parish Council of Forest Hill, the other side of Bayswater Road is in the area of responsibility of Stanton St John Civil Parish Council, and lies within the Church Parish of St Mary Bayswater, has done since 1958.

The Barton Northway Link Road was voted down (turned down in 1994) and this is mentioned in the Headington And Marston Area Transport Strategy put together by Colin Buchanan and Partners.

Highway Infrastructure 11.1.1 A new road link from the A40 Northern Bypass Ring Road to the John Radcliffe Hospital has been considered in the past. The protection of a route was included in the draft City Local Plan, but then was removed from the adopted Local Plan after consultation. (only those things that the Council are legally allowed to do get into the Adopted Local Plan)

Provision of this link is against the current policy of both the City Council and County Council, and the Radcliffe Hospitals Trust has openly stated that there is no desire on its part to see the link introduced, so therefore, in that case why is the BAAP trying to sneak it in again through the Back Door?

The land slopes quite steeply upwards between the A40 Northern Bypass and Dunstan Road, and appears to go on rising towards the hospital site, this would make it difficult to construct a crossing point for the link road at Dunstan Road and make it difficult to attain a safe approach alignment for vehicles wishing to join the A40. There used to be an alternate way out on to the A40 Northern Bypass down near the Victoria Arms Pub, in Old Marston Village, but it was closed off due to being an absolute death trap.

11.2.6 Overall, Colin Buchanan and Partners considers that the Councils are correct in rejecting the A40 Northern Bypass link road, as an option for the Local Transport Strategy. It would have a significant physical impact on adjacent property and on the wider area. It would also have a detrimental impact on the operation of the Ring Road, which is the County Council’s Oxfordshire Highways policy to protect.

11.2.7 These costs could not be justified by the benefits delivered.

A direct road link from the A40 Northern Bypass to the John Radcliffe has been suggested (namely by Nick Newman of Oxford New Labour and Oxford Prospect Magazine) and was included in the Draft Local Plan. However, following consultation a reservation for the link was deleted from the adopted Local Plan (if it is not in the adopted Local Plan, they are not allowed by law to do it) and the provision of this link is therefore not current policy of the City Council. In 1994 the County Council also resolved not to support the creation of this link, due to the A40 Northern Bypass having a bad accident record between the Marsh Lane Marston Flyover and Green Road Hamburger, of 8 fatal accidents and 169 non fatal accidents.

John Radcliffe Hospital: A direct road link from the A40 Northern Bypass will not be required.
Reasons for the Rejection of the Barton Area Action Plan

The fact that the Barton Area Action Plan would be in opposition to Comments made by Councillor Ed Turner in the Oxford Mail Newspaper, in which he said, and I quote “At the same time, we do not want to damage the economy or existing green spaces”. These comments appeared in the paper November 24, 2011, on page 9, in an article titled Traders Celebrate as Car Park Saved.

The fact that the Barton Area Action Plan is contrary to the following scientifically proven fact: Researchers have found that asthma rates among children aged between 4 & 5, fell by a quarter for every additional 343 trees per square kilometre. The fact is that breathing Oxfords air is the equivalent of smoking 3 packets of Rothmans cigarettes a day.

The Barton Area Action Plan is in defiance of the latest Strategic Environmental Assessment, which is part of the latest Oxford Local Transport Plan 3, known as LTP3. The BAAP is in defiance of Objectives 2, 3, 4 and 14 of the Strategic Environmental Assessment, which are integral to the LTP3.

Objective 2 states clearly that: enhance protect the green infrastructure of the area/region, which of course would apply to both Foxwell Drive and the Barton Nature Park.

Objective 3 states: protect and promote everyone’s physical and mental well being and safety, and bringing extra buses through Northway, especially through Foxwell Drive would defeat this objective and would be counter to it.

Objective 4 of the Strategic Environmental Assessment states clearly: reduce noise pollution, whereas bringing extra buses through Northway, especially through Foxwell Drive would defeat this objective.

Objective 14 of the Strategic Environmental Assessment is the most important one, it states that: maintain and enhance the quality and character of the landscape, including its contribution to the setting, and character of settlements, Barton West is in complete opposition and defiance of this.

As ripping out hedges and trees along the Northern Bypass and along Foxwell Drive would be going against this most important rule. Ripping out hedges and trees would lead to an increase in light pollution, noise pollution, and exhaust borne pollution, opening up Foxwell Drive and Northway more widely to extra buses and Ambulances would increase traffic congestion unacceptably on the estate, it would destroy the road surfaces, and it would lead to an unacceptable noise nuisance increase, it would put young children playing on Foxwell Drive play area at unacceptable risk. More bus traffic in Northway would lead to increasing axle vibration damage to local houses, it would cause subsidence and would cause property devaluation locally, making houses totally un sellable.

150 trees were planted by Mrs Jane Cox, on Foxwell Drive in the Summer of 1981, which she won in a National Environmental competition, and the trees have environmental/ecological value.

Foxwell Drive is a wildlife Corridor, as it acts as an extension of both Court Place Farm Nature Park, and as an extension to Peasemore Piece Nature Park. Foxwell Drive leads up to both Dunstan Road Park, and the Ruskin College Fields. Foxwell Drive is protected by the Henry Berry Covenant of June 30th 1948. The Barton Area Action Plan would do irrevocable harm to all of this, and would unacceptably put all of this at risk.

Flood alleviation work for both Northway and Barton have not been costed, experts recently just this week told Nick Fell, that it might, and could theoretically cost anywhere between 20 to 40 million £s, and that is back of a fag packet, back of an envelope rough guess work stuff. But that they were not certain what it would actually in the end cost. The fact that it has not so far been costed to date, is totally unacceptable. The fact that the Council cannot put a realistic figure on it, that they have no real idea of how much it will in fact actually cost to do at this late stage of the BAAP, is not good enough.

20 to 40 million £s was off the top of the guys head, it was simply his projection, of what it could maybe cost.
Reasons for Rejection of the Barton Area Action Plan

In the 2011 March Barton Area Action Plan document map there are yellow, green and black arrows showing the proposed Barton Northway bus route link. In the 2012 February edition of that map the green, yellow and black arrows had gone, and were not to be found, thereby the map is lacking accuracy, and thereby how can people make an informed choice, and decision when information is lacking.

Wednesday 21st March 2012 Barton Area Action Plan documents, were found to contain errors to do with defunct website addresses given, and e mail addresses found to be incorrect had been advertised, how does that help people to be able to research and respond in time? Causing unnecessary delay, and prejudicing people’s ability to respond before the deadline.

Northway was only mentioned in a throwaway sentence in the small pocket guide 2010 Barton Area Action Plan document. Otherwise apart from that Northway receives no mention at all. Northway residents were not included at all in the distribution of the 2010 Barton Area Action Plan, thereby not informed of its existence.

Northway residents were only included in distribution of Barton Area Action Plan when the second document came out, dated 24/6/2011, and were also only included in the current third round of Consultation documents February 2012. So because Barton has had three rounds of Consultation, and Northway residents have only been consulted twice, Northway residents have thereby been both legally and procedurally disadvantaged, creating bias and prejudice.

The Barton Area Action Plan is misleading because it does not make any mention of the word Northway on the cover, thereby not making it clear that it has anything to do with Northway residents, and thereby Northway residents could be forgiven for thinking and or believing that it does not concern them.

The Barton Area Action is unsound and unjustified and not duly made, because it goes against, and is in defiance of the City Council Green Space Strategy document, Northway, and Headington more widely is under provided with Green Space, it goes against the City Council Parks and Open Spaces in Oxford 2011 consultation document, it is in defiance of the City Councils Consultation Strategy document.

The consultation return figures for the BAAP second round were massaged downwards, and are inaccurate, and unreliable, thereby not to be trusted.

The fact that the boundaries for the Barton Area Action Plan have been steadily creeping ever outwards since the release of the 2010 small pocket guide document, which showed just the fields in Barton, then the boundaries were enlarged in the BAAP March 2011 document, and altered again in the February 2012 document.

The distribution of the BAAP document for March 2011 was very hit and miss, this was discovered when the Northway Residents Group did the Petition, in late 2011, just before Christmas, against the Barton Northway Bus Link Road, and we found on the doorsteps that residents from Barton Road, down through Barton Lane, and all along St Andrews Road, and down along Dunstan Road, some had had the BAAP document, and some had not had the document, some residents had not even heard of it, and had no idea what it was. We blame this partly on the Council, and partly on the Friends of Old Headington being very selective with who they gave it too, and partly Headington Committee for Development Action are also to blame for this, again for selective distribution. Partly it was also to do with the fact that the Barton Road area no longer has a Residents Association.

Lowering the Speed Limit to 40mph on the Northern Bypass would be counter productive, 8 fatal accidents, and 169 non fatal accidents, despite the fact that there is a perfectly adequate underpass between Barton Village Road and Barton Road, which is perfectly safe to use.

The reasons that lowering the speed limit would be counter productive is that it would increase noise volumes, higher revs, and lower gears used, thereby increasing pollution from exhaust emissions, it would also increase congestion, and cause an increase in dangerous frustration overtake manoeuvres, and cause an increase in bunching and tailgating, and could cause a rise in rear end collisions.
I offer in evidence the Association of British Drivers Press Release 737 Localism A Threat To Road Safety, and ABD press release 752 local Authorities Urged to Listen to Police Experts on Speed Limits. I also offer as supporting evidence, as to why lowering the Speed Limit to 40mph on the Northern Bypass would be a bad idea, are the Speed.LIMIT website documents Lower Speeds By Stealth, The Highways Agency, and Local Authorities are taking the law into their own hands in imposing unjustified blanket speed limit cuts, Turning The Screw, How inconsistent, politically motivated speed limit cuts are compromising safety on our roads, and Fabulous Forties, the rise and fall of the suburban 40mph speed limit. And also I offer in evidence a copy of Ben Lovejoy's article titled Why Councillors Can't Be Trusted To Set Speed Limits.

Oxford Thames Valley Police Traffic Division have already come out against the lowering of the Speed Limit to 40mph, the idea is also not supported by Mark McArthur Christie, Oxford Institute of Advanced Motorists, and also does not have the support of Mark Strange, Chairman of Oxford Branch of the Driving Instructors Association. Oxfordshire Highways department, Oxfordshire County Council also have come out against the plan.

The Barton Northway Bus Link is in defiance of Safe Speeds document titled Buses are surprisingly dangerous to pedestrians. This is backed up by Association of British Drivers Press Release 432 Government Pedestrian Casualty Figures Overtunp Public Perceptions on Speed and Bus Safety. Buses “13 Times More Likely” to knock someone down than “White Van Man”

Policies encouraging the use of filthy polluting diesel engine buses have a detrimental effect on air quality. Oxford, another backward, heavily bus reliant city that has misguidedly banned cars from its centre for politically motivated ideological reasons, now, as a result, has air quality so bad it is the equivalent of smoking more than 61 cigarettes a day.

With bus exhausts containing the two most deadly, and carcinogenic chemicals known to science, 3NBA and 1,8 DNP, this being Dinitropyrene. Buses are heavy emitters of Nitrogen Dioxide and General Particulates, both of which are respiratory irritants. 3BA or better known as 3 Nitrobenzathrone, was found to cause DNA migration in human liver cancer, and lung cancer cells, 3 NBA is a dangerous geno toxic carcinogen.

Only 0.00000003 grams of both these pollutants (1,8 DNP and 3NBA) caused 5 and 6 million mutations respectively in standard AMES tests of carcinogenicity. According to recent research by CALOR, standing in the car free centre of Oxford, for 24 hours, is equivalent to smoking 61.4 Rothmans “Light” cigarettes in terms of inhalation of Nitrous Oxides. Oxford was found to be the worst offender of 30 such sites tested. Mile for mile buses are filthy polluters compared to the modern car.

Buses outside of London emit an average of 221g/km CO2e per passenger km. National Environmental Technology Centre Data shows that an average diesel engine bus emits as much particulate pollution as 128 individual cars, and as much oxides of nitrogen, or NOX, as 39 individual cars per km. The University of Tokyo has found the poisonous compound chemical 3 Nitrobenzathrone in diesel bus exhausts when the engine is under load, eg when pulling away from a high street bus stop. At the time of its identification, this chemical was, and probably still is, one of the most carcinogenic chemicals known to man and science.

Buses are expensive, inflexible, and unreliable, and do not go where people need to get. Buses consume 60% more energy than cars per person transported, thereby they are not sustainable, and they take up 200% more public space. John Prescott admitted to Motoring Journalist Mike Rutherford, “that it will be 2017 before the Bus pollution problem can be solved”. Also see the information supplied in our Independent Consultants letter to the Traffic Commissioner (copy supplied).

The Barton Area Action Plan is unsound, not justified, and not duly made because it is in direct contravention of the City Council Local Plan Policy documents, namely the Oxford Open Air Sports

Then there is the matter of Michael Crofton Briggs attempted evasion and suppression of debate on the matter of the Petition of 1800 signatures, against the Barton Northway Bus Link Road, delivered to the City Council in December 2011, received by Elise Benjamin, the City Council Mayor of Oxford, at Full Council, where she gave a binding verbal understanding, and assurance that there would be such a debate.

Michael Crofton Briggs, in a letter dated 13 March 2012, stated “There will not be a future debate at Full Council on this petition because it relates to a planning matter that falls outside the scheme for Debate on Public Petitions”. Mr Michael Crofton Briggs also stated in the same letter, that: “I have been prompted to write to you now because of recent correspondence received from Miss Gibbs, which seems to imply a misunderstanding of how we had acknowledged the petition”. This is a red herring, as there was no misunderstanding as to how the Petition was acknowledged by Elise Benjamin, Lord Mayor of Oxford.
WYATT Richard

From: ROBIN GARDINER
Posted At: 18 March 2012 14:03
Conversation: Barton Area Action Plan
Posted To: planningpolicy@oxford.gov.uk
Subject: Barton Area Action Plan RAW Printed

Barton Area Action Plan

22/03/2012
18 March 2012

Dear Sirs

Looking at the “Barton Area Action Plan Proposal” one can not help wondering just who it is supposed to benefit; certainly not the people of Barton. As usual, Barton, its residents, wildlife and civic amenities have been totally disregarded.

Oxford already has a richly deserved country-wide reputation as one of Britain’s most motorist unfriendly cities, a reputation that is killing city centre businesses. The proposed alterations to the ring-road will do nothing to improve that reputation by creating a bottleneck for traffic either entering the town or passing through on the A40, or trying to move to or from the A34 via the motoring nightmare that is Headington Roundabout. Thanks to this ambivalent attitude to the motor car, business in Headington is already suffering and this state of affairs can only be exacerbated by the new proposals. Anyone who regularly uses the eastern bypass will already know just how counter-productive ridiculous traffic control measures can be and the new proposal will only serve to extend that scenario to the northern bypass as well.

Barton itself is already split into east and west by one major road and if the new proposal goes ahead it will gain another busy thoroughfare dividing it North from South (i.e. Stowford and Fettiplace Roads). Not ideal, as the main recreation ground for the estate will be separated from most of the estate by this road. Then there is the traffic noise created by vehicles using this road feeding the 1,000 plus houses proposed for the area just west of Barton and the extra traffic noise caused by heavy traffic moving slowly along the Northern Bypass, particularly if the trees that now screen the road are removed.

Having lived on Barton for the greater part of 65 years I have already seen the estate and its community spirit repeatedly mauled to the extent that it is now only a pale shadow of its former self; how much more are we expected to put up with. Our pubs have gone, two of our schools have gone and we now have only one road off the estate toward Headington and Oxford where we used to have two. We do still have the road to the villages to the North of us but that mainly just brings more traffic through the estate making it all but impossible for local residents to get to work in a reasonable time. There was a promise made some little while ago that there would be no road giving vehicular access between the new estate and the old Barton estate. So much for promises, we are to have at least one road and possibly as many as three. Clearly we can not trust the word of Oxford City Council. The new proposal will hardly improve matters by increasing the traffic on Bayswater Road and the proposed new access road linking the new estate to the Northern Bypass can only serve to make bad matters there even worse. Because of the
already existing congestion at the roundabouts at both ends of the Northern Bypass it already, during rush hours, resembles nothing so much as a huge car park. Clearly, whoever put this proposal together knows absolutely nothing about the traffic problems already facing Barton and to a large extent Headington.

Traffic flow in the immediate area will undoubtedly be further hindered by the proposed new large supermarket. This proposed store will need a good deal more than the 1,000 or so new homes to support it and will obviously bring a lot more traffic onto the estate. One wonders if the City Council has already considered turning Stowford and Fettiplace Roads into dual carriageways to enable them to cope with the extra traffic flow! The existing roads on the estate are nothing more than Concrete slabs laid directly onto the ground below and as the buses here have shown, are incapable of carrying heavy traffic.

As I mentioned above, I have lived on this estate almost continuously since it was first built, since 1947, and have seen some things that the planners appear to be ignorant of. In the late 1940s and 1950s quite a range of war and other military surplus was dumped here. Aircraft parts were buried where Bayard’s School now stands. All sorts of military hardware was buried under what is now the recreation ground at the bottom of Barton Village Road. Some quite nasty chemicals were buried in the same general area, which might account for the lack of wildlife in Barton Brook downstream of there. There are a number of important archaeological sites to the west if Barton Village Road recreation ground and as Headington was once home to the court of King Ethelred these site might be important. All in all, a prime site for development!

What the Council proposes, instead of creating a single community, will actually form four completely separate estates with the existing Barton Estate losing almost everything and getting nothing at all except problems in return.

If the Council must build these new homes then why not put them to the North of the Botley Road, out as far as Binsey, where there are huge undeveloped areas, lots of access and nothing like the number of people already crammed in. Isn’t it time the City Council considered the needs of local residents and not the wants of Brooks University and the John Radcliffe Hospital, who already have far too much control over what happens to East Oxford.

Yours faithfully

Robin Gardiner
Dear Sir or Madam

Please note the following responses to the consultation on the Barton Area Action Plan Proposed Submission document.

We have the following observations to make regarding the proposals presented:

Section 2

2.2

The assertion made that "It will be integrated with the neighbouring communities...". This is not substantiated by the features indicated on Map 1, which shows just 3 crossings of the A40, in a length of well over ¾ mile. The implication of this is that residents of communities either side of the A40 will have to travel up to 350 yards laterally parallel to the A40 to find a crossing point - this is much too inconvenient and frustrating to allow effective integration of the communities. Map 1 also indicates no public transport connections with any of the neighbouring communities, and the only "potential additional linkages for pedestrians and cycles" shown is, in fact, along the north side of the A40, connecting only to the extreme corner of the existing Barton community. If genuine integration of communities is the objective, there will be much greater connectivity provided.

It is asserted that "The stretch of ring road between a new junction and the Headington Roundabout will change in character. Lower speeds and less traffic noise will allow ...". The development site extends at least 200 yards west of the indicated position of the new junction, as does the existing Northway community to the south of the ring road; it will be necessary to change the character of the whole length of the A40 fronting the development site and the Northway neighbourhood, not just the stretch to the east of the new junction. Traffic control measures must therefore extend further west than is described here.

It will be absolutely essential that speeds are, in fact, lowered, and this will necessitate much more than simple regulation, yet the importance of this is not apparently recognised and very little indication is provided as to how this objective will be achieved.

2.3

The assertion is made that: "There will be very strong connections between the new neighbourhood and Barton, Northway and Old Headington ...". With the exception of Barton, this assertion is not in any way substantiated; there are very few crossing points indicated for the A40, or indication of how more of these could actually connect into the named existing communities. The statement that: "There will be new ring road crossings for pedestrians and cyclists. A network of pedestrian and cycle connections will link the new community to existing facilities, adjacent areas and other destinations across Oxford" is not borne out by any of the subsequent details of the proposals, which show only one such new crossing, and provide no indication of any kind of 'network' of the type described.

Section 3

3.2
This refers to the objective (among others) of bringing "safer and easier-to-use cycle and pedestrian access between Barton and the rest of Oxford." It is difficult to see how the proposals detailed actually represent any significant improvement over the existing provisions.

3.3
This states as an objective: "Improved and additional links across the ring road ..". Apart from the Headington roundabout, the proposals indicate only 3 links across the ring road, two of which already exist, and only one of which appears to be subject to improvement.

3.4
This again refers to a "A network of footpaths and cycle ways ." but there is no evidence provided of any such network, which, to be effective, would have to be established beyond the development area. The minimal number of A40 crossing points hardly constitute a 'network'.

Section 5
5.3
This section asserts that the ring road will be transformed and that traffic speeds will be reduced to a maximum of 40mph. The latter phrase can be interpreted as either a statement of fact, in that a statutory speed limit at this level would be imposed, or as a statement of intention, i.e. that effective measures will be taken to genuinely achieve the stated traffic speeds. Evidence from other sections of the ring road makes it clear that simple imposition of a statutory speed limit will be ineffective in controlling traffic speeds. 'Transformation' of the ring road, as asserted, will not be achieved simply by this measure. It is stated that "The lower traffic speeds will allow traffic management measures .."; in reality, the traffic management measures will be required in order to achieve the reduction in traffic speed, rather than being a product of the speed restriction. The measures mentioned comprise a single signal controlled road junction or roundabout, and "multiple ... crossings for pedestrians and cyclists", yet only one such crossing is indicated. This does not constitute an effective traffic management measure, and, however easy to use in itself, it does not represent convenience to the residents needing to use it, owing to the inevitable detours necessary. We believe that a roundabout is likely to be much more effective, both in allowing free traffic flows and in altering driver perceptions and thus traffic behaviour. However, we feel that much greater consideration must be given to how the character of the road can be changed, since this is an essential part of the design strategy for the development. We are concerned that the introduction of perhaps two sets of traffic lights on this wide and straight dual carriageway, which is all that the proposals described amount to, will not "transform the look, feel and operation of this stretch of the ring road." A wide range of other measures should be considered to achieve this transformation. A notable omission is any discussion of street lighting to the A 40.

Illustrations 1 and 2
There is little difference between these illustrations, but, it is unhelpful to indicate buildings with roof slopes which effectively preclude solar energy harvesting, and perhaps misleading to show multiple balconies overlooking the ring road, even if traffic speeds are successfully reduced. It also appears that A40 carriageway widths might be substantially reduced, though this is not mentioned as a traffic management measure.

It should be clarified that, whilst buildings facing the A40 can be effective in altering the character of the road, they should not be positioned directly on its edge. The illustrations suggest a potentially acceptable solution, with the indicative position of service roads, cycle tracks, informal parking and substantial planting, but the text does not explain the point.

5.4
This states that: "The changes to the ring road must consider the setting of the Old Headington Conservation Area .". There is no explanation of this. Of course, it is necessary to consider this Conservation Area in developing all the proposals for the new neighbourhood, not just the effects of the transformation of the ring road, though we would presume that a reduction in traffic speeds to 40mph maximum would be likely to be beneficial rather than adverse.
Policy BA1

The first paragraph should be amended to make it clear that the stretch of the ring road whose character will be transformed will extend along the whole length of the new development, not just from "the western approach to the new junction." Paragraph 2 should be amended to reflect the possible benefits of development facing the ring road, without allowing development right on its edge. The reference to the central reservation is obscure, since there is no discussion of planting and landscaping detail elsewhere, and the requirement to reduce the density of planting here should be subject to detailed design, the positions and nature of additional crossing points, traffic management measures etc. Likewise street lighting design may play a significant part in design development, but it rightly is not mentioned here.

BA3

It is unclear what the intentions of either of the two bullet points is, since they appear to provide no guarantee of the future availability of land for allotment cultivation, and inadequately define the circumstances in which development of the currently-uncultivated land may be developed.

5.13

There is no reference to areas of land adjacent to the development site but south of the ring road, which could perhaps considered for development as public open space serving both the existing new communities, which, with adequate links, could possibly enhance integration of the communities, whilst, if included in the area to which the '10% open space' rule applied, allow some increase in housing density on the site itself.

Map 4

The designation "Allotment Association Land" is erroneous; we are advised that this land is in fact owned by Oxford City Council.

5.19

This refers to the new development being well connected to surrounding areas etc. but, in general and as commented on elsewhere, the proposals give little detail about how this will be achieved.

5.20

This purports to refer to the encouragement of sustainable modes of travel, yet fails to mention the importance of convenient cycle connections to major centres of employment, including the need for multiple crossings of the A40. The reference to a new "local centre at the heart of the community" is meaningless, since, apart from suggesting a "range of facilities", there is no indication what these might be, and no discussion on their viability or potential location, for example. Viability is likely to require 'critical mass', which may have implications for connections to neighbouring communities.

BA5

As discussed elsewhere, the current proposals are in conflict with the policy objective of "ensuring excellent cycling and walking links from the development across the A40 ring road".

5.27

Although this states that there will be three vehicle accesses, only that off the A40 is described. Although left-in, left-out and right-in, right-out is mentioned, Illustration 9 omits any indication of intended movements for private road vehicles. It also fails to show how cycle traffic will be accommodated "safely and conveniently", or on what routes. Convenience will necessitate a straight-through facility, without multiple dog-legs or sets of traffic lights. We consider that a roundabout would be a much more satisfactory solution, both in allowing greater freedom of traffic flow and in managing traffic behaviour.

5.32

He assertion that there will be "multiple safe and convenient pedestrian and cycle crossing points
on the ring road" is not substantiated by any representation on any of the illustrative plans.

5.34
This admits to the possibility of "at least one other new pedestrian and cycle crossing of the ring road .." and discusses one possible location, but it does not indicate what form it might take, or what contribution it might make to transforming the character of the ring road. There is no other indication of how or where any further pedestrian and cycle crossings of the A40 might be provided, and how they might realistically contribute to the connection of the new development to the existing communities south of the ring road, and be effective in helping transform the character of the ring road.

BA7 103/7/BA7 2(OF)
This makes no mention of even the possibility of provision of additional pedestrian and cycle crossings of the ring road. Stoke Place is currently a bridle path with a very strong and distinct character, forming part of the Old Headington Conservation Area, and whilst upgrading to make it more readily usable as an adequate connection route will be necessary, this must be carried out with extreme sensitivity.

Section 6
6.13
This discusses what the new local centre is expected to achieve, but has no detail of what it might comprise. There is discussion of the need to ensure that its location and connectivity must be chosen to ensure convenient access, but no consideration of other issues critical to the success of the centre.

6.14 & 6.15
It is implied that the local centre will contain elements of retail development, but there is no discussion of the likely nature or viability of this, or of the likely relationship of the new local centre to existing such facilities in neighbouring communities, both in terms of geography and business competition. A significant element of a vibrant community is likely to be an active and successful local centre, but the manner of achievement of this needs much greater consideration, as does the likely effect of the success of such a centre on those in adjacent neighbourhoods. Some consideration of the business as well as the social case for the centre should therefore be demonstrated.

6.17 103/8/BA10 2(COF)
Whilst the provision of flexibility for alternative uses is sensible, insistence on excessive ceiling heights may restrict design opportunity and limit the density of accommodation which can be provided. No arguments are presented in substantiation of the ceiling heights quoted, but whilst 3.5m on the ground floor may not be excessive, a requirement for first floor ceiling heights of 3.3m does appear to be so. If this provision is considered appropriate, justification should be provided.

Section 7
7.1 - 7.3 103/9/BA12 2(COF)
An important element of sustainable design is retention and utilisation of rainwater, and re-cycling of grey water. Reference to this should be made, particularly in view of the issues associated with waste water, drainage and flooding dealt with in Section 8.

7.6
Illustrations 1 and 2 should be made consistent with the requirement in this section for designs to maximise the potential for exploitation of solar energy.

7.10 - 7.20 103/10/BA13 2(COF)
In addition to the other design guides quoted, it should be a requirement that design of the development is carried out with regard to the principles described in Manual for Streets 1 and 2.
7.10 - 7.17
A major omission is the absence of recognition of the biggest design constraint of the site - the presence of the A40 ring road along its southern boundary. Whilst this is discussed elsewhere, the intention is clearly that the transformation of the character of the ring road is a fundamental part of the design of the entire development. Accordingly, it is serious omission that no requirement has been discussed or included in policy BA13 for any consideration to be given to how this transformation might be achieved in specific design terms. It is also clear that the design of parts of the development must reflect the presence of the road, its characteristics, and what is appropriate; such a requirement should be stated.

Section 8
Generally

Consideration should be given to the preparation and adoption of a detailed design code for the development.

There is no mention of the archaeological potential of the development site. In fact, there have been a number of reports of archaeological significance on the site, and reference should be included in the AAP.

It is inevitable that development on this scale will involve phasing, but it is very important that supporting infrastructure, particularly bus connections and cycling and pedestrian routes are established early, to avoid development of travel behaviour patterns inimical to the principles of sustainable living discussed in the proposals, since achieving retrospective changes in such patterns is notoriously problematic. It is essential that the new neighbourhood is an attractive and convenient place to live from the outset.

Yours faithfully,

Peter Thompson

Chairman, Oxford Civic Society

Oxford
Consultation

Barton Area Action Plan (Proposed Submission Document)

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Public Profile

Name Simon Ratcliffe
Email

Private Profile

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

Headington

Postcode

Gender

What is your age?

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

What is your ethnic group?

Your ethnic group (if you answered other)

Are you disabled?

Organisation Name

Job Title / Position within the Organisation

Areas of Interest

Survey Types
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### Actions

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Dear Michael

Barton Area Action Plan (AAP) proposed submission document

Please find attached the County Council’s formal response on the Barton Area Action Plan consultation.

We are supportive of the AAP objectives to: Deliver a strong and balanced community, bring wider regeneration of neighbouring estates, improve accessibility and integration, encourage a low carbon life-style, and introduce design that is responsive and innovative. However, there a number of policies within the consultation which raise some concerns.

The County Council will be submitting a formal objection to wording within policy BA1 relating to the 40 mph speed limit on the A40. As the Highway Authority we do not find this speed limit acceptable. The A40 not only forms part of the Oxford ring road but it is a strategic route from areas west of the county travelling to London and Heathrow and is also a key corridor for freight movement. The County Council has a responsibility to ensure safe and effective movement of traffic which includes the ability for the A40 to perform its function as a strategic part of the transport network. There have been substantial investments made to improve this route and the surrounding network, in particular at Headington roundabout, and there are future improvements planned at Kennington and Hinksey Hill. Any changes to the A40 should complement and not erode these investments in the highway network. The County Council needs to take account of all users of the route and consider on balance a reduction in speed limit from 70mph to 50mph would be appropriate. This would help bring the speed limit in line with the majority of the Oxford ring road while improving safety along this stretch of road and improve the capacity.
It is very important that the new community is sustainable and well integrated with the rest of Oxford, linking with key parts of the city as well as wider employment locations. Substantial investment in bus services, walking and cycling routes will be required to achieve this. With these in place the accessibility to and from the area is viewed as more analogous to the transport central area (as defined in the City Council’s sites and Housing DPD) and car use is therefore expected to be low. To ensure that the development is delivering the most appropriate strategy with regard to the site’s car parking, the policy within the AAP should set out specific criteria for car parking standards for the site. Higher level general documents such as the county council’s parking policy and emerging Sites and Housing DPD contain more general policy and set out maximum parking standards where the detailed context of individual sites is unknown. The AAP is a more specific planning framework and should contain more precise definition than the Core Strategy or Sites & Housing DPD because the context of the site is known.

Due to this, and the fact developable land is at a premium, we do not believe there is a need to apply the maximum parking standards which are defined for areas with poor accessibility. It is felt that one parking space per house, with additional spaces dedicated to car clubs, should be pursued. Therefore, the County Council will be submitting a formal objection to the wording in policy BA5.

To support integration and reduce the severance effect of the A40, the County Council’s stance has always been to promote bridges and can confirm that we will not accept standard toucan crossings on this part of the A40. The introduction of new crossings would run counter to the role of the A40 as a strategic route. Given the flexibility of the wording which includes the option of providing a bridge we will not be objecting to this policy. However, the County will be expecting to use the master planning process to progress bridges as the means of providing access and good integration.

The County Council supports the development of a new multi-purpose community hub within the local centre – including a primary school and social and community uses. The policy allows for a developable overall site area of at least 2.2 hectares for the hub building. The County would want to make clear in this response that 2.2 hectares would be required for educational purposes, additional land would be required for other uses.

It’s extremely important when moving forward through the master planning process that we work in close partnership, utilising the new governance arrangements for development and regeneration in Oxford. This is essential to guarantee the successful delivery of the Barton development while ensuring that the key objectives of each authority are taken into account.

Yours sincerely

Huw Jones
Director for Environment & Economy
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
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First name
Laura
Last name
Peacock
Job title (where relevant)
Senior Policy Officer
Organisation (where relevant)
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Address line 2
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Telephone number
01865815669
Email address (USE CAPITALS)
LAURA.PEACOCK@OXFORDSHIRE.GOV.UK

*Client name and organisation
(where relevant)

Signature: ___________________________ Date: ________________

16 March 2012

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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?

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

The County Council considers this to be an important issue relating to the soundness of the Barton Area Action Plan

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

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Oxford
OX1 1DS

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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)

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<th>Policy</th>
<th>BA5</th>
<th>Proposals map</th>
<th>Sustainability appraisal</th>
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Q2. Do you consider that the document is:

(a) legally compliant? Yes   x   No
(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.

The county council objects to wording in Policy BA5 and paragraph 5.20 relating to the amount of car parking applied to the new development. The wording states that car parking levels will not exceed the maximum levels set out in the emerging city council Sites and Housing DPD.

It is very important that the new community is sustainable and well integrated with the rest of Oxford, linking with key parts of the city as well as wider employment locations. Substantial investment in bus services, walking and cycling routes will be required to achieve this. The county council supports the aspirations of sustainable travel in the policy, but to achieve this, expects a lower level of parking than the maximum standard to be required.

To ensure that the development is delivering the most appropriate strategy with regard to the site’s car parking, the policy within the AAP should set out specific criteria for car parking standards for the site. Higher level general documents such as the county council’s parking policy and emerging Sites and Housing DPD contain more general policy and set out maximum parking standards where the detailed context of individual sites is unknown. The AAP is a more specific planning framework and should contain more precise definition than the Core Strategy or Sites & Housing DPD because the context of the site is known. The Barton development will benefit from excellent public transport provision and excellent walking and cycling network. Residents will be within walking and cycling distance of a primary school, supermarket and other local facilities. It is therefore appropriate for the Barton AAP to set a specific parking policy for the site that falls well below the maximum parking standards set out in the county council’s parking policy and emerging Sites and Housing DPD.
The county council would consider paragraph 5.20 and Policy BA5 sound if the wording were changed to read:

**Paragraph 5.20:** "car parking levels below the maximum standards set out Oxfordshire County Council's Car Parking Policy and the Sites and Houses DPD"

**Policy BA5:** "Restricting the amount of car parking to less than the maximum space per dwelling with dedicated spaces to be available for car-clubs. Delivered with implementation of suitable car parking controls if required."

Maximum standards are applied where there is poor access to public transport, services and facilities — it is not considered Barton falls into this category. The county council would therefore expect less than the maximum (two spaces) to be provided to minimise the traffic impact on the network and encourage a high level of sustainable travel.

The county council would be seeking to deliver on average approximately one parking space per dwelling, with additional parking provision for car clubs.

The level of car parking has an impact on the transport network and land availability due to the space that will be required for car parking. Both of these have an impact on the deliverability of the site, particularly as land is at a premium and the surrounding highway network is heavy congested. Therefore, greater information regarding the proposed provision for car parking on the site should be provided within the document.
**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:

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<td>- Include plans for providing supporting infrastructure;</td>
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<td></td>
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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: planning.policy@oxford.gov.uk

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7 Plans for the local area that are prepared by the Local Strategic Partnerships.
8 Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning.
9 This monitors progress towards delivery of plans and policies.
Barton
Area Action Plan
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
Mrs

First name
Laura

Last name
Peacock

Job title (where relevant)

Organisation (where relevant)
Oxfordshire County Council

Address line 1
Speedwell House

Address line 2
Speedwell Street

Address line 3

Address line 4

Postcode
OX1 1NE

Telephone number
01865 815669

Email address (USE CAPITALS)
LAURA.PEACOCK@OXFORDSHIRE.GOV.UK

*Client name and organisation
(where relevant)

Signature: ___________________________ Date: 16 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?

<table>
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<th>No, I do not wish to speak</th>
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| 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 county council objects to the wording in Policy BA1 and paragraph 5.3 relating to the “...reduction in traffic speeds to a maximum speed limit of 40mph”.

As the Highway Authority, the county council is instrumental in enabling this AAP policy and cannot be achieved without our approval.

The county council is not supportive of a speed limit reduction to 40mph for a variety of reasons meaning that this policy within the Area Action Plan is not deliverable.
To satisfy the county council and enable the full delivery of the AAP and its policies, the text in paragraph 5.3 and policy BA1 should be changed to read:

**Paragraph 5.3:** “Traffic speeds will be subject to a speed limit of 50mph or more”

**Policy BA1:** “......to secure a reduction in traffic speeds to a speed limit of 50mph or more”

The current speed limit of the A40 is 70mph and the county council is willing to co-operate and reduce this, but only to 50mph. This will still enable the objectives of the development to be delivered and will also help to improve the capacity of the ring road and bring it in line with the majority of the Oxford ring road while improving safety along this stretch of road.

The A40 not only forms part of the Oxford ring-road but is also a key route from areas west of the county to London and Heathrow and is also a key route for freight movement. It carries approximately 40,000\(^1\) vehicles a day (5%\(^2\) HGVs, 35%\(^3\) longer distance E-W trips - M40 / Witney). As the highway authority we have a responsibility to ensure safe and effective movement of traffic including the ability for the A40 to perform its function a strategic route.

The Primary Route Network (PRN) is a national system which designates routes between major settlements and ports/airports. The A40 is classified as part of this network the route is therefore defined as a road suitable for longer distance and inter-regional traffic. It forms main connections between defined primary destinations including with motorways and the national lorry route network. It should be able to cater for relatively high levels of traffic with the purpose to allow for free passage of current and expected future traffic.

Reducing the speed limit of the A40 will have some impact on journey time and the greater the reduction in speed the greater the impact. For commuters and businesses using this every day the culmination of delay over a year would amount to a significant number.

Substantial investments have been made to improve this route and surrounding network such as Headington Roundabout and Heyford Hill, and more is planned for the future with committed investment at Kennington and Hinksey Hill. Significant improvements for the northern approaches are also being pursued. Any changes to the A40 should complement and not erode these investments in the highway network.

A level of noise reduction will still be achieved by reducing the speed limit to 50mph; if a further reduction is shown to be required then this could be achieved through improved surfacing.

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\(1\) – Sept 2011 12Hr ATC, \(2\) – Sept 2010 manual classification count, \(3\) – 2007 COTM base
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