

South Oxfordshire Local Plan Proposed Main Modifications Consultation Comment Form

Please return by midnight on Monday 2 November 2020 via email planning.policy@southoxon.gov.uk or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)

This form has two parts:
Part A – contact details
Part B – your comments

Part A

Are you responding as an: (please tick)

Individual

Business or organisation

Agent

A name and contact details are required for your comments to be considered.

1. Personal Details

2. Agent Details (if applicable)

Title	<input type="text" value="Mr. and Mrs."/>	<input type="text"/>
Full Name	<input type="text" value="Nicholas & Edith Coulton"/>	<input type="text"/>
Organisation (if relevant)	<input type="text"/>	<input type="text"/>
Job Title (if relevant)	<input type="text"/>	<input type="text"/>
Address Line 1		<input type="text"/>
Address Line 2		<input type="text"/>
Address Line 3		<input type="text"/>
Postal Town		<input type="text"/>
		<input type="text"/>
		<input type="text"/>
Telephone Number		<input type="text"/>
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- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

Part B – Please use a separate sheet for commenting on each proposed main modification or consultation document

You can provide your comments on the Emerging South Oxfordshire Local Plan Proposed Main Modifications in this section.

The list of documents you can comment on are:

- Schedule of Proposed Main Modifications
- Schedule of Policies Map Changes
- Sustainability Appraisal Report Addendum
- Habitats Regulations Assessment Addendum

Please note we are inviting comments on the Proposed Main Modifications and documents listed above only - this is not an opportunity to make comments on any other part of the Plan.

If you are commenting on the Main Modification document, please provide the main modification number (for example MM1) in the box below.

If you are unsure of the 'modification number', please refer to the Schedule of Proposed Main Modifications.

If you are commenting on any of the other consultation documents (for example the Sustainability Appraisal Addendum), please provide the relevant section, paragraph or page number in the box below:

Modification Number or
Document, section, paragraph or page
number

MM2

Please provide your comments below:

If your comments are over 500 words it would be really helpful if you could also provide a summary of your comments using the text box in the next question.

If you wish to include any supporting documents, please attach them to this comment form.

The main modification we require is the REMOVAL of Bayswater Farm Field (BFF) from Strat.13. PLEASE REJECT PLANNING PERMISSION FOR THIS SITE. The proposal breaks planning law as set out in the [national planning policy framework – gov.uk](https://www.gov.uk/national-planning-policy-framework). (NPPF).

Bayswater Farm Field was introduced without due process; there was no section 18 consultation; and it only featured in plans from January 2019. The inspector's comments and modifications are almost entirely related to other (much larger) areas of the South Oxfordshire Plan and pay scant attention to Bayswater Farm Field.

MM2 states “**support growth in areas that reduce the need to travel, minimising pollution and carbon emissions**”.

Any development around Sandhills will inevitably contribute traffic which will directly cut across this Modification. Already busy commuting periods see long tailbacks of traffic on the roads leading into the Headington roundabout from all directions. This also affects A40 lanes around the Thornhill/Sandhills traffic lights.

If Bayswater Farm Field is connected to Sandhills, traffic from there will add to the congestion – and therefore to pollution and carbon emissions - both at busy commuting times and when the school is assembling or leaving. Many parents walk from Barton by way of the footpath, as well as from various parts of Sandhills, to take their children to or from school, along with babies in prams and push-chairs and with toddlers walking. These are all at levels particularly endangered by traffic fumes.

This bad situation would be even worse affected if traffic to or from increased housing north of Bayswater Brook were able to come through Sandhills.

There is now no shop on Sandhills, and there is no direct public transport to access some of the available supermarkets. Much supermarket shopping has to be done by car to transport items in bulk. **Far from “reducing the need to travel” (MM2) a development on Bayswater Farm Field would add to it.**

It is likely that, as with current residents in Sandhills, many residents of any new development would not necessarily work in Oxford itself but in surrounding areas – or much further afield – and would need to use car journeys to get to work.

All transport studies have shown that on the eastern side of Oxford, up to 70% of journeys are by car; only 5% are by bus. For anyone wanting to cycle home from Oxford to Barton or Sandhills, a 2 mile uphill journey is entailed: not something most people with much shopping or heavy bags would contemplate.

The schools on Waynflete Road, Barton, will also be greatly prejudiced by such build-ups of traffic.

Bus routes on Waynflete Road are already congested through other traffic moving or parked on the narrow roads there.

Far from “minimising pollution and carbon emissions” (MM2) the proposed development on Bayswater Farm Field would greatly increase these, and not least affecting what might be left of the Green Belt area of Outstanding Natural Beauty.

This is Sandhills' only Green Space, important for the physical, mental and spiritual well-being of residents – as also for people from Barton.

NPPF 143 says that any development harmful to the Green Belt is inappropriate and should not be approved.

NPPF 144 says that any “very special circumstances” are nonetheless clearly outweighed by potential harm to the Green Belt.

THE PROPOSED LINK ROAD to the north of Sandhills, running from the Marston Interchange across to join the A40 somewhere (where?) near Forest Hill would complete the encirclement of Sandhills and that important Green Belt area with all its wildlife; rather than “*minimising pollution and carbon emissions*” as MM2 requires, it would disastrously increase it with resultant damage to local people and their children as also to wildlife and the natural world.

(Continue on page 5 if necessary)

If your comments cover more than the boxes provided, please use the space below to provide a summary. You are not required to summarise your comments, but a summary would help us in our reporting.

Please provide your summary below:

Bayswater Farm Field should be removed from Strategy 13, and Planning Permission rejected as have been all previous planning applications over previous decades. It was included only in January 2019 without due process and with no section 18 consultation.

Any development of Bayswater Farm Field would fail the MM2 requirement: “support growth in areas that reduce the need to travel, minimising pollution and carbon emissions”.

The A40 and other roads around Sandhills are already heavily congested. The area is not adequately served by public transport other than directly into Headington and Oxford. The great majority of journeys whether for work or for shopping already have to be made by car. Increased traffic and congestion on Sandhills itself would add further danger to children and accompanying toddlers and babies walking to school, both from accidents and from air pollution and carbon emission.

The important Green Belt area would also suffer: far from pollution and carbon emissions being minimised, they would be increased to a disastrously damaging extent.

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MM4

Please provide your comments below:

If your comments are over 500 words it would be really helpful if you could also provide a summary of your comments using the text box in the next question.

If you wish to include any supporting documents, please attach them to this comment form.

The points which we made on MM2 apply with equal (if not added) strength to Main Modification 4 where the Inspector gives even greater emphasis to the “**need to reduce travel**” and to “**minimise carbon emissions, lower energy use, and help to reduce the need to travel**”.

We repeat that the main modification we require is the **REMOVAL** of Bayswater Farm Field (BFF) from Strat.13 and our request that the Council **PLEASE REJECT PLANNING PERMISSION FOR THIS SITE**.

The proposal is **FLAWED**, in that Bayswater Farm Field was introduced without due process, with no section 18 consultation, and only featured in plans from January 2019.

Now it is even more clear that it breaches the [national planning policy framework – gov.uk](https://www.gov.uk/national-planning-policy-framework). (NPPF), particularly NPPF 143 and NPPF144, and flies in the face of the Prime Minister’s own recent statements in the House of Commons when answering Tory MPs’ questions on 23rd and 30th September that **it was Government policy to do everything they could to keep the commitment to protect the Green Belt, not to desecrate it, and to focus on Brown field development with an emphasis on affordable housing**.

The inspector’s comments and modifications are scarcely related to Bayswater Farm Field, which is eclipsed in his Response by his concentration on much larger areas of the South Oxfordshire Plan. He does not seem to have looked in any detail at the implications for Sandhills itself or for the neighbouring areas of Barton. Bayswater Farm Field is nowhere specifically mentioned in the Modifications.

The implications are particularly serious for SANDHILLS, and certainly run contrary to the Inspector’s requirements at MM4.

Any development around Sandhills will inevitably contribute traffic which will directly cut across this Modification. Already busy commuting periods see long tailbacks of traffic on the roads leading into the Headington roundabout from all directions. This also affects A40 lanes around the Thornhill/Sandhills traffic lights.

If Bayswater Farm Field is connected to Sandhills, traffic from there will add to the congestion – and therefore to pollution and carbon emissions - both at busy commuting times and when the school is assembling or leaving. Many parents walk from Barton by way of the footpath, as well as from various parts of Sandhills, to take their children to or from school, along with babies in prams and push-chairs and with toddlers walking. These are all at levels particularly endangered by traffic fumes.

This bad situation would be even worse affected if traffic to or from increased housing north of Bayswater Brook were to be able to travel through Sandhills.

There is now no shop on Sandhills, and there is no direct public transport to access some of the available supermarkets. Much supermarket shopping has to be done by car to transport items in bulk. **Far from “reducing the need to travel” (MM4), a development on Bayswater Farm Field would add to it.**

It is likely that, as with current residents in Sandhills, many residents of any new development would not necessarily work in Oxford itself but in surrounding areas – or much further afield – and would need to use car journeys to get to work.

All transport studies have shown that on the eastern side of Oxford, up to 70% of journeys are by car; only 5% are by bus. For anyone wanting to cycle home from Oxford to Barton or

Sandhills, a 2 mile uphill journey is entailed: not something most people with much shopping or heavy bags would contemplate.

The schools on Waynflete Road, Barton, will also be greatly prejudiced by such build-ups of traffic.

Bus routes on Waynflete Road are already congested through other traffic moving or parked on the narrow roads there.

Far from “minimising pollution and carbon emissions” (MM4) the proposed development on Bayswater Farm Field would greatly increase these, and not least affecting what might be left of the Green Belt area of Outstanding Natural Beauty. This is Sandhills’ only Green Space, important for the physical, mental and spiritual well-being of residents – as also for people from Barton.

NPPF 143 says that any development harmful to the Green Belt is inappropriate and should not be approved.

NPPF 144 says that any “very special circumstances” are nonetheless clearly outweighed by potential harm to the Green Belt.

THE PROPOSED LINK ROAD to the north of Sandhills, running from the Marston Interchange across to join the A40 somewhere (where?) near Forest Hill would complete the encirclement of Sandhills and that important Green Belt area with all its wildlife; rather than *“minimising pollution and carbon emissions”* as MM4 requires, it would disastrously increase it with resultant damage to local people and their children as also to wildlife and the natural world.

NOTHING in the present proposals would **“reduce the need for travel”** (MM4) Instead they would exacerbate it. The predictable congestion on Sandhills would also **increase (not reduce) carbon emissions** – and do so where more people would be directly affected.

(Continue on page 5 if necessary)

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Please provide your summary below:

Bayswater Farm Field should be removed from Strategy 13. Planning Permission should be rejected as have been all previous planning applications over previous decades. It was included only in January 2019 without due process and with no section 18 consultation. The proposal is essentially **FLAWED**.

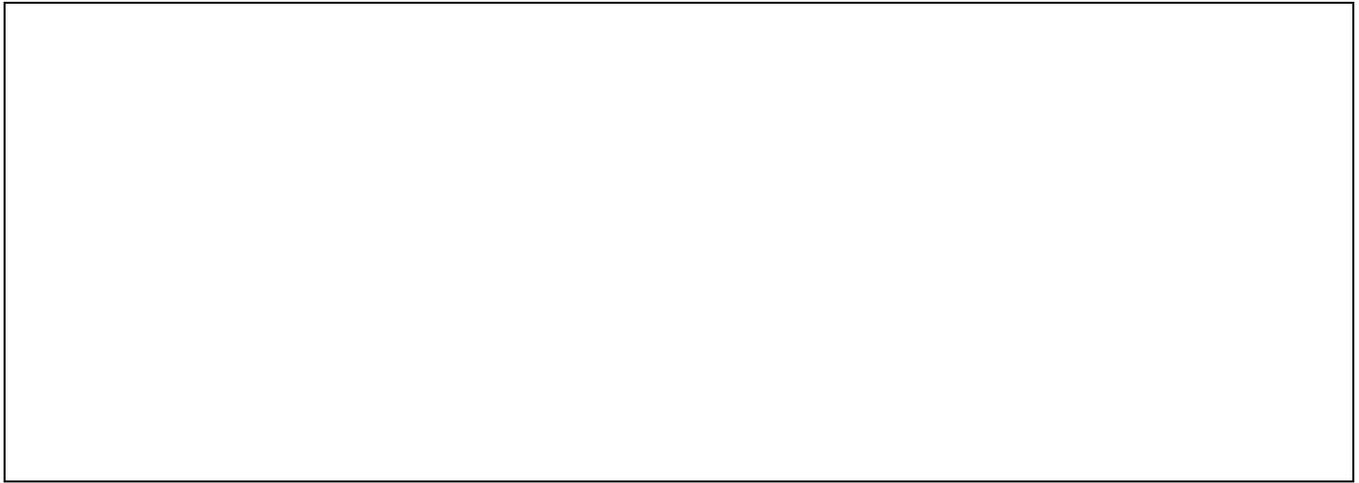
Recent political developments (including the Prime Minister’s own parliamentary answers to questions arising from [national planning policy framework – gov.uk.](https://www.gov.uk/government/policies/national-planning-policy-framework)) show that **NO DEVELOPMENT** on Bayswater Farm Field should be permitted.

In particular, NPPF 143 & NPPF144 both strengthen the Inspector’s insistence in MM4 that Travel (and the Need for Travel) must be reduced, carbon emissions minimised, and energy lowered.

Sandhills is already a particularly vulnerable site. The proposed Link Road would turn it into a traffic-island, hugely exposed to increased carbon emissions as well as to noise and air pollution, with resultant danger to residents as well as to wild life in what would remain of the Green Belt area of **OUTSTANDING NATURAL BEAUTY**.

Any development on Bayswater Farm Field would result in even more congestion along the A40 and other roads around Sandhills. The area is not adequately served by public transport other than directly into Headington and Oxford. For this reason, the great majority of journeys whether for work or for shopping already have to be made by car. Nothing suggests a reduction in the ‘Need for Travel’.

Any further development would compound the danger to the many children (and accompanying toddlers and babies) walking to school, both from Sandhills and from Barton, both through accidents and from air pollution and carbon emission.



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MM9

Please provide your comments below:

If your comments are over 500 words it would be really helpful if you could also provide a summary of your comments using the text box in the next question.

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In MM9 the Inspector insists that the Green Belt boundary can only be altered to accommodate [supposed!] strategic allocations “**where the development should deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land, with measures supported by evidence of landscape, biodiversity or recreational needs and opportunities.**”

In the case of Bayswater Farm Field there are **NO POSSIBLE COMPENSATORY MEASURES** which could make up to the residents of Sandhills and neighbouring areas of Barton for damage done to what would be left of the Green Belt and Area of Outstanding Natural Beauty.

We repeat, as with our representations under MM2 and MM4, that the inclusion of Bayswater Farm Field (BFF) in the SODC Local Plan is, in any case, **DEEPLY FLAWED**:

- (a) BFF was only included in plans from January 2019;
- (b) it was introduced without due process;
- (c) there was no Section 18 consultation;
- (d) the Inspector makes no specific mention of BFF in his Main Modifications, which are mostly concerned with much larger areas of South Oxfordshire.

Again, we ask for the **REMOVAL** of Bayswater Farm Field from Strategy 13, and for the Council to **REJECT PLANNING PERMISSION FOR THIS SITE**.

- (a) The house numbers for the proposed development are too small to warrant ‘Strategic Site status’. They will add little to Oxford City’s housing needs, and are unlikely to provide much by way of affordable housing; they are more likely to be expensive housing for commuters, contributing a larger profit margin for developers. Commuters will add to traffic problems, with consequent impact on noise, pollution, and accidents.
- (b) It is a separate development from Land North of Bayswater Brook and has different site owners.
- (c) As has been stated by Oxfordshire County Council: “*Transport links are not a good enough strategic reason to build on this Green Belt land*”.

All previous pleas to build large scale across this important natural asset have been met with planning refusals (1961, 1973, 1989) on the grounds that :

- (i) it is “unsuitable for development despite the demand for houses”;
- (ii) “the number of vehicles likely to be generated would adversely affect residential amenities”;
- (iii) the “High Quality of landscape” should be “conserved and enhanced” and its “character and appearance” protected;
- (iv) “there would be an unquantifiable loss of amenity for the numbers of people who regularly use the attractive bridle path and benefit from the view”.

Since the Inspector held his hearing and issued his Modifications, it has become even more clear that the proposed development on BFF **breaches** the [national planning policy framework – gov.uk](#). (NPPF), particularly NPPF 143 and NPPF144, viz: (1) Any development harmful to the Green Belt is, by definition, inappropriate and should not be approved, and (2) Any claim of “very special circumstances” is **CLEARLY OUTWEIGHED** when a proposed development is inappropriate by reason of the resulting harm to the Green Belt.

The Prime Minister himself has said clearly in the House of Commons on 23rd and 30th September in answer to questions from Tory MPs that **it was Government policy to do everything they could to keep the commitment to protect the Green Belt, not to desecrate it, and to focus on Brown field development with an emphasis on affordable housing.**

If Councillors will not immediately Reject the Proposal as FLAWED, or intrinsically INAPPROPRIATE, we ask them to **consider THE FOLLOWING FURTHER FACTORS** arising from MM9:

- (1) Bayswater Farm Field with the Green Belt area of which it is part is the ONLY GREEN SPACE immediately accessible for Sandhill residents of all age groups;
- (2) One of the houses immediately adjacent to BFF is a supported home for independent living for vulnerable adults. The home has been specifically sited there for the peace and safety of those residents.
- (3) The footpath from Barton alongside BFF is used several times daily by children walking to the school in Sandhills, many if not most of whom are accompanied by parents and younger siblings. BFF is a vital fresh-air lung for their journey; if development is permitted, they would be walking along a narrow alley between housing estate walls or fences.
- (4) Older pupils from Barton also use that footpath daily and enjoy its taste of countryside and fresh air *en route* to catching their school bus to Wheatley from the A40 bus stop opposite Thornhill Park and Ride.
- (5) The footpath is also much used by Sandhills residents walking to catch No.8 buses to Oxford on Waynfilet Road, and in the other direction by Barton residents (as well as Sandhills residents) wanting to enjoy the open space, wonderful views, and experience of nature in the fields leading towards Forest Hill.
- (6) The footpath is much used by people exercising their dogs on a daily basis or more frequently.
- (7) NPPF 180b requires that "*tranquil areas prized for recreational amenity*" should be identified and protected.
- (8) It is a route at present free from traffic fumes, from noise, and forms of air pollution.
- (9) The Covid-19 pandemic has given increased awareness of the importance of maintaining and preserving readily accessible open space which people of all ages can easily reach on foot, to breathe fresh air, enjoy being in green space with beautiful views, and experience the variety and life of the natural world.
- (10) The countryside views from Bayswater Farm Field are particularly beautiful and inspiring, with an appreciation of the changing seasons. All this is recognised as an important value for the mental and spiritual wellbeing of human beings. A housing development would block that view as well as seriously impacting on wild life and the preservation of that countryside.
- (11) Sandhills has very few other amenities. BFF is not merely a Green Space. It is a recognised **AREA OF OUTSTANDING NATURAL BEAUTY** and as having **HIGH LANDSCAPE VALUE**. It not only serves Sandhills residents in that respect. It also serves many residents from the nearer parts of Barton.
- (12) As shown on the Defra Magic Map, 2020, Bayswater Farm Field is an Area of **Habitat Special Protection** and **Woodland Priority Habitat Network Significance**.
- (13) The Forestry Commission has also designated the area surrounding the brook at Sandhills as an area of '**Countryside Stewardship Scoring Woodland Priority Habitat Network**'.
- (14) The Inspector's MM9 highlights the importance of such matters when he sets out in Appendix One, para.5, page 44, at 4.59 the requirements for

Compensatory Measures and mitigation: **“The Policy requires compensatory measures to be delivered to remediate for the removal of land from the Green Belt. This is required by the National Planning Policy Framework at paragraph 138. Each relevant strategic allocation policy where Green Belt has been altered sets out requirements for the site and some of these measures could be considered as compensatory measures. Evidence on landscape, biodiversity or recreational needs with site specific recommendations and opportunities will also provide recommendations for enhancements that would deliver compensatory improvements on remaining Green Belt. The compensatory gain would be expected to be demonstrated through the individual site masterplans and secured through developer contributions if these enhancements are outside of the red line boundary of a planning application.”**

- (15) NO ADEQUATE COMPENSATION OR MITIGATION is possible in the specific context of Bayswater Farm Field.
- (16) What Bayswater Farm Field contributes is a relatively undisturbed special environment for wildlife habitat, which cannot be recreated elsewhere. The peace and quiet of the limestone fallow grass land combines with the surrounding combination of Woodland – which includes mature oak, ash, birch and traditional orchard – alongside the protected waterway of Bayswater Brook.
- (17) Rather than any net gain in biodiversity, any development on BFF would cause **a definite loss – which could not be offset elsewhere.**
- (18) The noise and pollution of a development on Bayswater Farm Field– especially in the construction stages - and then the continuing increased footfall, light pollution, close proximity to traffic, and constant noise would put protected habitats at SERIOUS RISK.
- (19) At its widest, BFF is only 170 metres wide. There could not be a sufficient 150 metre buffer zone from the edge of the Priority Protection zone. Therefore there could not be adequate protection for threatened habitats.
- (20) **Wild Oxfordshire** states: *“Wildlife of important habitats such as that found on **Sites of Special Scientific Interest (SSSI) and Local Wildlife Sites (LWS)** cannot survive indefinitely in isolation, but need to be part of a wider network of habitats connected at landscape scale”*. Bayswater Farm Field and the rest of the adjoining Green Belt land lie at the centre of a vital landscape triangle - Shotover, Sydlings Copse Triangle SSI, and Otmoor. It is a crucial part of a wider network of biodiversity. **NO MITIGATION nor ‘Offsetting’ is possible** which could replace the damaging loss if development were permitted on Bayswater Farm Field.
- (21) **Oxford City Council’s Local Plan** itself marks out Bayswater Brook Network for special protection, stating (5.1): *“Oxford benefits from a wide range of green spaces. There are also many brooks and streams, for example Bayswater Brook and Northfield Brook, which form part of wildlife and movement corridors.”* It is not only individually, but as part of a wider network for wildlife movement, that these features are important. The City Council has stated that it will DENY PLANNING PERMISSION *“if existing tree cover and semi-rural landscape are not enhanced and wildlife corridor function of the brooks retained”*. That enhancement would not be possible with a development on Bayswater Farm Field, and the wildlife corridor function would inevitably be damaged...with consequent harm to the viability of wildlife.
- (22) **State of Nature in Oxfordshire 2017:** *“There is continued fragmentation and loss of connectivity across the county’s landscape affecting the future viability of habitats and species”*. Why could the (unproved) need of

development on BFF be permitted to add to that fragmentation and loss of connectivity?

- (23) The great delight of the Sandhills Green Belt area, including Bayswater Farm Field, is the result of centuries of delicate and intricate interrelating of species, habitats and landscape. Gradually reducing that into smaller patches of land will prove insufficient to support complex ecological communities presently found in the field, wood and waterways.
- (24) The agent for the Sandhills site, AECOM, has already been judged by Oliver de Soissons, Chartered Institute of Ecology and Environmental Management, as using a substandard ecological assessment of the impact of housing in its report on Sidlings Copse. **No development should be permitted without a detailed ecological impact assessment.**

These concerns would be even more alarming were approval given to THE PROPOSED LINK ROAD to the north of Sandhills, running from the Marston Interchange across to join the A40 somewhere (where?) near Forest Hill (see our response to MM17 and new criterion 3.ix on page 72). That would complete the encirclement of Sandhills and that important Green Belt area with all its wildlife. It would further imperil biodiversity; it would turn Sandhills into a polluted traffic island, with resultant damage to local people and their children as also to the safe movement of wildlife and to the interactions of the natural world.

For all these many reasons, we strongly urge the **REMOVAL** of Bayswater Farm Field from Strategy 13, and the **REJECTION OF PLANNING PERMISSION FOR THIS SITE.**

(Continue on page 5 if necessary)

If your comments cover more than the boxes provided, please use the space below to provide a summary. You are not required to summarise your comments, but a summary would help us in our reporting.

Please provide your summary below:

No compensatory measures or mitigation can redeem the damage to Green Belt landscape, biodiversity, access to recreational & health-giving space – the only Green Space easily accessible for residents in Sandhills and the nearer parts of Barton.

Bayswater Farm Field is quite distinct from Land North of Bayswater Brook, with different site owners; it must be separately considered. It adds little to Oxford City Council's housing stock; it is unlikely to provide much by way of affordable housing, and is more likely to provide expensive housing for commuters (thereby increasing traffic with consequent further risks).

The proposed development on Bayswater Farm Field conflicts with numerous official statements on the importance of that **AREA OF OUTSTANDING NATURAL BEAUTY** and **WOODLAND PRIORITY HABITAT NETWORK**.

And, anyway, the proposal should be rejected outright as lacking due process and being flawed in several respects.

In many ways the proposal contravenes the criteria of the National Planning Policy Framework and the Prime Minister's own recent assurances in the House of Commons.

The use of the footpath from and to Barton by Sandhills residents of all ages, and by Barton residents, will be seriously impaired by the loss of open space, fresh air, interaction with nature, and will be seriously disrupted by increased traffic, noise, air pollution, carbon emissions.

Biodiversity, wildlife habitats and movement corridors, and ecological communities, will all be harmed. Their connection to similar areas within a vital landscape triangle will be lost. No properly-detailed ecological assessment has yet been made.

Even greater damage will be caused if the proposed Link Road is permitted – see our response to MM17.

Thank you for your comments.

Please return by midnight on Monday 2 November 2020 via email planning.policy@southoxon.gov.uk or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)

South Oxfordshire Local Plan Proposed Main Modifications Consultation Comment Form

Please return by midnight on Monday 2 November 2020 via email planning.policy@southoxon.gov.uk or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)

This form has two parts:
Part A – contact details
Part B – your comments

Part A

Are you responding as an: (please tick)

Individual

Business or organisation

Agent

A name and contact details are required for your comments to be considered.

1. Personal Details

2. Agent Details (if applicable)

Title	<input type="text" value="Mr. and Mrs."/>	<input type="text"/>
Full Name	<input type="text" value="Nicholas & Edith Coulton"/>	<input type="text"/>
Organisation (if relevant)	<input type="text"/>	<input type="text"/>
Job Title (if relevant)	<input type="text"/>	<input type="text"/>
Address Line 1		<input type="text"/>
Address Line 2		<input type="text"/>
Address Line 3		<input type="text"/>
Postal Town		<input type="text"/>
		<input type="text"/>
		<input type="text"/>
Telephone Number		<input type="text"/>
Email Address		<input type="text"/>

Sharing your personal details

Your name, contact details and comments will be shared with the Planning Inspector and a Programme Officer, who acts as a point of contact between the Council, Inspector and respondents.

This means that you may be contacted by the Programme Officer or the Council with updates and in relation to any necessary consultations on the Local Plan. This is in accordance with Regulation 19 and 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 102 of The Conservation of Habitats and Species Regulations 2017.

We have received assurance that the data passed to the Planning Inspector and Programme Officer will be kept securely and not used for any other purpose. The Inspector and Programme Officer will retain the data up to six months after the plan has been adopted.

Comments submitted by individuals will be published on our website, alongside their name. No other contact details will be published. Comments submitted by businesses and/or organisations will be published, including contact details.

Please refer to our Privacy Notice regarding how your personal data is used for this consultation, available on our website southoxon.gov.uk/newlocalplan. If you would like to know more about the councils data protection registration or to find out about your personal data, please visit: southoxon.gov.uk/dataprotection

Future contact preferences

As explained above, in line with statutory regulations, you will be contacted by the Programme Officer (and where necessary the Council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy consultation database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

Part B – Please use a separate sheet for commenting on each proposed main modification or consultation document

You can provide your comments on the Emerging South Oxfordshire Local Plan Proposed Main Modifications in this section.

The list of documents you can comment on are:

- Schedule of Proposed Main Modifications
- Schedule of Policies Map Changes
- Sustainability Appraisal Report Addendum
- Habitats Regulations Assessment Addendum

Please note we are inviting comments on the Proposed Main Modifications and documents listed above only - this is not an opportunity to make comments on any other part of the Plan.

If you are commenting on the Main Modification document, please provide the main modification number (for example MM1) in the box below.

If you are unsure of the 'modification number', please refer to the Schedule of Proposed Main Modifications.

If you are commenting on any of the other consultation documents (for example the Sustainability Appraisal Addendum), please provide the relevant section, paragraph or page number in the box below:

Modification Number or
Document, section, paragraph or page
number

MM17

Please provide your comments below:

If your comments are over 500 words it would be really helpful if you could also provide a summary of your comments using the text box in the next question.

If you wish to include any supporting documents, please attach them to this comment form.

MM17 Land North of Bayswater Brook. As can be seen, the Inspector's modifications with regard to **access and traffic** are largely concerned, either with the proposed Link Road, or with the land on the far (western) side of Bayswater Road, Barton, from SANDHILLS. There is NO specific mention of Bayswater Farm Field at all.

However, the implications for Sandhills of any development on BAYSWATER FARM FIELD (BFF) are severe.

As with our comments on MM2, MM4 and MM9, we protest that the proper concerns of Sandhills residents have not been given proper attention:

- (1) Bayswater Farm Field only featured in plans from January 2019;
- (2) It has been introduced into the planning without due process;
- (3) There was NO section 18 consultation;
- (4) There is separate site ownership from Land North of Bayswater Brook.
- (5) The proposed 150 houses on Bayswater Farm Field will do little towards Oxford City's housing requirements (which are, in any case, based on an outdated algorithm) – few will be affordable housing, most are likely to be designed for commuting executives (with profit margins favouring developers).

The main modification which we require is THE REMOVAL OF BAYSWATER FARM FIELD from Strategy 13, and THE REJECTION OF PLANNING PERMISSION for this site.

We draw particular attention to the problems regarding traffic and access. The Concept plan attached to the Main Modifications appears to show, extremely faintly, an arrow on Burdell Avenue indicating one-way access through Sandhills to the proposed development on BFF. Whether this is the intention or if the flow were to be in the other direction, either would cause considerable danger and difficulty for the residents of Sandhills.

We set out later in this response to MM17 how this would be exacerbated if the proposed Link Road from the Marston interchange joining the A40 somewhere (where?) near Forest Hill (as envisaged by the Inspector at MM17 para 2(vi), p.71, Para 3(iii) p.72 and Para 4.115 p.69) were to have a link in to BFF and so to Sandhills..

Access from the A40 to Bayswater Farm Field through Sandhills and onwards to Barton. This was one of the reasons that at the Inspector's hearing Oxfordshire County Council opposed the building of 120/150 houses on Bayswater Farm Field.

- (6) Sandhills streets are narrow, even without the permitted residential parking. There is almost always building construction work being carried out on one or more houses with consequent parking on the roads, and as a result of Covid-19 there are many more delivery vehicles coming to the houses. It is important to maintain ease of access for emergency vehicles such as ambulances in a community which has many elderly and vulnerable people. Opening Sandhills to through traffic either to or from Barton and beyond would have a serious and constant impact.
- (7) Sandhills will be perceived as a tempting short cut for commuters and lorries coming from London and wanting to reach the very large housing development proposed for Barton, near to the Crematorium; they will do so to avoid an increasingly congested Green Road roundabout whenever they perceive a tailback from there towards Thornhill.

- (8)** There is already congestion at the busy junction from Sandhills onto the A40. The traffic lights there give considerable priority to traffic in both directions along the A40.
- (9)** There are only limited periods for traffic to turn into Sandhills from the London direction, so there will be longer tailbacks on the slip road; there is often traffic wanting to do a U-turn in that slip-road to return along the A40 in the London direction.
- (10)** Traffic from the Thornhill Park and Ride also has its turn to access Sandhills – which is likely to be greatly increased if this is the main access to Bayswater Farm Field and, beyond, to the nearer parts of Barton.
- (11)** Both **(9)** and **(10)** will be joined by traffic coming along the A40 from Oxford to access both Sandhills and the Bayswater Farm Field.
- (12)** Providing access through Sandhills to Barton and beyond will inevitably lead to tailbacks from the A40 junction if traffic is being routed down narrow, tree-lined, Burdell Avenue because to turn into Burdell it has first to give way to traffic coming eastward along that top part of Merewood Avenue; the alternative which drivers may choose will be to go the long way round the U-bend Merewood Avenue (despite its narrowness) to join Burdell Avenue further down. Until now Merewood Avenue has been free of traffic apart from what serves its own residences.
- (13)** A further likely possibility is that drivers seeking to get to, or through, the Bayswater Farm Field will try to outflank any blockages on Burdell Avenue by instead turning immediately onto Delbush Avenue – with the same problems about turning right, off Merewood Avenue, as demonstrated under **(12)** above - and then creating tailbacks along Hill View right next to the Care Home for Independent Living of vulnerable adults through the Sandhills estate.
- (14)** The turning-circle at the bottom of Burdell Avenue, adjoining that Care Home, will become unsafe with traffic queuing to enter BFF.
- (15)** Tailbacks on these roads, with traffic idling, will substantially raise pollution levels on the estate for all residents, especially dangerously for children walking or cycling to the Sandhills Primary School and for the vulnerable adult residents in the Care Home at the corner of Burdell Avenue and Hill View.
- (16)** Vehicles caught in tailbacks will be not only cars but also vans and lorries with greater levels of emission, particularly dangerous for small children; many toddlers, little ones in buggies and babies in prams daily accompany older children on their way to and from Sandhills School.
- (17)** Increased traffic, especially at rush hours, will coincide with the times when children are walking or cycling to school, either along Burdell and Merewood Avenues, or along Hill View and Delbush Avenue to the footpath through to Terrett Avenue. As well as children from Sandhills itself, many children come to school from Barton, either along the ancient bridleway (dating from Norman times) adjacent to Bayswater Farm Field or else along the footpath bordering

the A40 from Headington, the latter having to cross Merewood Avenue at the congested junction in order to reach Terrett Avenue and the Primary School. The risk of serious accidents will be substantially increased. Older pupils from Barton also use that bridleway in order to access school buses at the Thornhill layby on the A40.

- (18)** Traffic wanting to cut through Sandhills to Bayswater Farm Field, and also through Bayswater Farm Field into Barton and beyond, will be not only commuter traffic at peak periods but also HGVs, construction vehicles and a growing number of Delivery Vans as people increasingly seek home deliveries, throughout the day. All of these greatly increase the potential for accidents, noise, and air pollution.
- (19)** The exit from BFF via Hawkes Close is particularly problematic, being on to a steep narrow slope leading to a 'blind' T junction on to a single road which is utterly unsuited to any significant volume of traffic. In icy conditions or poor visibility, it would be very dangerous. And yet if traffic is allowed to go from the A40 through Sandhills and BFF, that is precisely the danger which would be entailed...as it would also be if it were only the exit for vehicles from BFF itself.
- (20)** The character of Sandhills which has been a peaceful residential area will be completely changed, and this at a time when Oxford City Council as well as Oxfordshire County Council is gradually rolling out Low Traffic Neighbourhood plans to avoid 'rat runs'. Because Sandhills has now no shop, there is nothing to argue against its continuing as, effectively, a Low Traffic Neighbourhood.
- (21) The National Planning Policy Framework (NPPF) 108 stipulates that "it should be ensured that b) Safe and suitable access to the site can be achieved for all users".**
- (22) NPPF 98 stipulates that Planning policies and decisions should protect and enhance public rights of way and access.** To have a road cutting across the bridlepath at the bottom of Burdell Avenue would clearly NOT comply with NPPF98.

If the arrow on the Concept Plan is reversed – or if traffic is permitted otherwise to flow from BFF through Sandhills to the A40 at Thornhill, the following problems will (also) occur:

- (23)** The commuter vehicles and lorries mentioned in **(6)** above will flow in both directions – and this will be exacerbated if the proposed Link Road through the Green Belt has an access road to the Bayswater Farm Estate. There will be many vehicles from Barton and beyond seeking to avoid tailbacks along Bayswater Road to the Green Lane roundabout.
- (24)** This will exacerbate congestion at the Sandhills-Thornhill junction onto the A40, cutting across traffic from Risinghurst or Barton taking children to Sandhills School.
- (25)** Rather than having to juggle with oncoming traffic moving northward along Burdell Avenue, traffic coming from Bayswater Farm Field and further parts of

Barton, whether coming via Hawes Close or from an access off the Link Road, will turn left along Hill View and up Delbush Avenue - with consequent increased danger (accidents, noise, air pollution) for all residents there, and particularly for those in the Home for Independent Living for vulnerable adults on the corner of Burdell Avenue and Hill View.

- (26) The turning-circle at the bottom of Burdell Avenue, adjoining that Care Home, as described in (14) above will become doubly unsafe with traffic entering Sandhills from BFF and, perhaps, meeting traffic queuing to come in the other direction. That house has been specifically chosen as the Care Home in order to give its vulnerable adults the peace and safety of that particular part of Sandhills.
- (27) Traffic moving southward up Delbush Avenue will inevitably cause tailbacks at its junction when trying to exit onto Merewood Avenue – with all the consequent danger of exhaust fumes for children being taken to school along the footpath from Delbush Avenue through to Terrett Avenue or from Merewood Avenue directly into Terrett Avenue.

A possible Link Road from the Marston interchange, crossing Bayswater Road and cutting through the Green Belt north of Sandhills to join the A40 London Road somewhere (where?!) near Forest Hill (as proposed by the Inspector at MM17 Para 2(vi) p.71, Para 3 (iii) p.72, Para 4.115 p.69). Many of the points made above apply with as much, if not greater, force to the possible Link Road:

- (a) Such a link road between Bayswater Road and the A40, joining the latter somewhere between the Sandhills School and the turn off to Forest Hill, will have the effect of turning Sandhills into a traffic island, more completely isolating it from the benefits of the vital green space and any part which can still be considered an Area of Outstanding Natural Beauty;
- (b) It would cut directly across the present bridlepath from Barton to Forest Hill, in contravention of NPPF98 "*planning policies and decisions should protect and enhance public rights of way and access*"; this bridlepath is used greatly by walkers, including families with young children from Barton and Sandhills, seeking to enjoy and benefit from the many aspects of that particularly outstanding countryside;
- (c) it would further destroy wild life at a time when stark warnings have just been issued (2019 State of Nature report and David Attenborough's film 'EXTINCTION') that a quarter of mammals and nearly half of bird species are in danger of extinction through the loss of habitats.
- (d) A bridge would have to be constructed across the brook at Sandhills (at whose expense?) such a crossing would destroy the area surrounding the brook which the Forestry Commission has designated as an area of "*Countryside Stewardship Scoring Woodland Priority Habitat Network*".
- (e) At a United Nations summit as recently as 28th September 2020 the Prime Minister signed a Leaders' Pledge to protect 30% of the UK's land

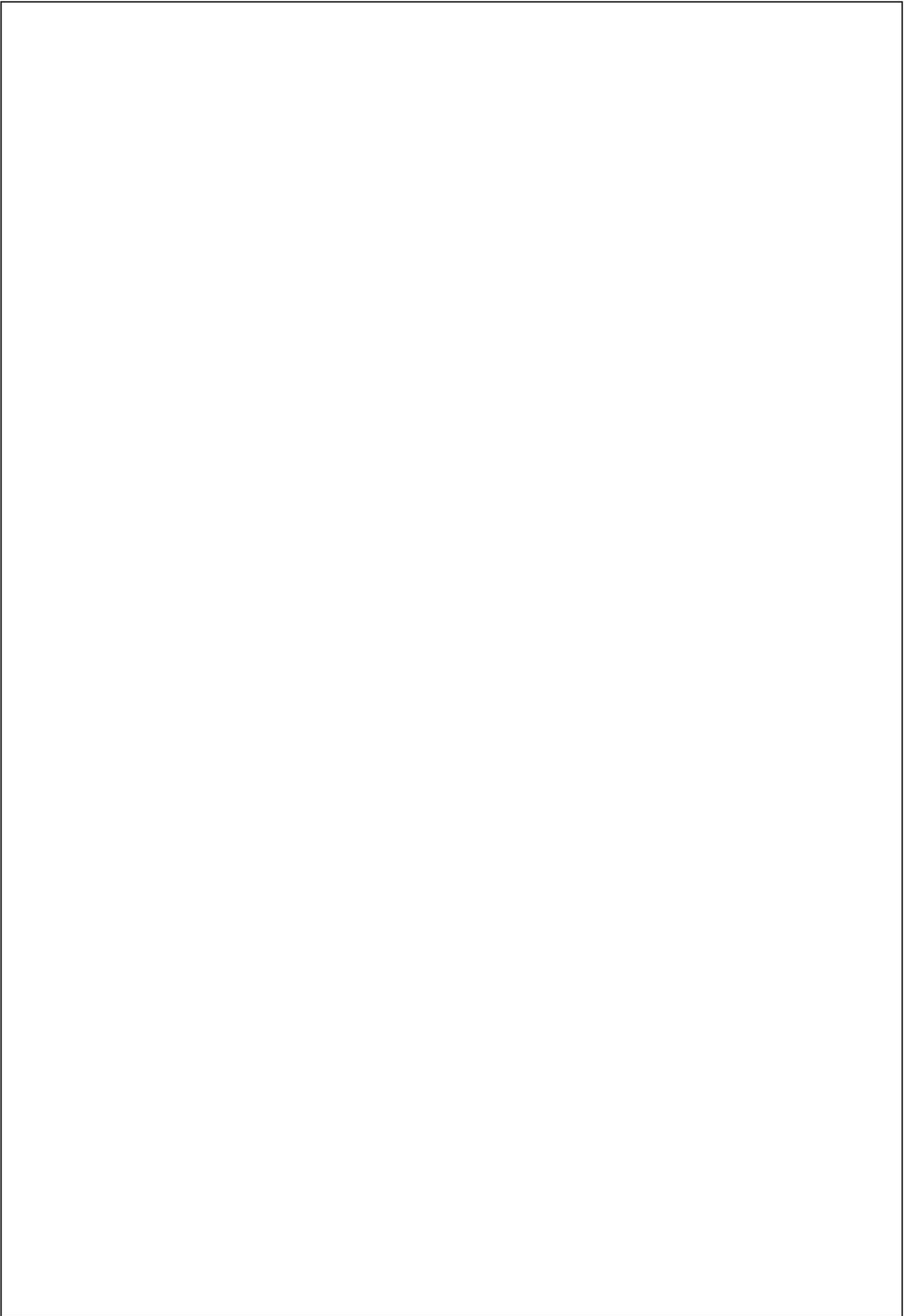
by 2030, warning that countries must act to reverse biodiversity loss and prioritise a green recovery from coronavirus. Currently only 8% of the UK's land is protected. A link road to the north of Sandhills would be completely contrary to this huge undertaking.

- (f) Inevitably, unless there were a further set of lights east of Thornhill with a traffic filter or else another roundabout making it possible for traffic from the London direction to turn north onto the new Link Road, a junction between the link road and any development on the Bayswater Farm Field would attract more vehicles (cars, HGV vehicles and vans) cutting through Sandhills from the A40 in order to reach Barton and beyond (in order to avoid the Headington roundabout). Consequently noise and pollution would be even more greatly increased, disastrously affecting anything left of that Area of Outstanding Natural Beauty between the B4027 and the Sandhills Estate, and adversely affecting also the residents of Sandhills, Bayswater Farm and the area around Waynflete Road.
- (g) Traffic from Islip along the B4027 towards Wheatley and London will be drawn, past the Crematorium entrance, onto the Link Road in order to avoid the narrow roads and delays through Stanton St. John and Forest Hill – and the same will happen in the reverse direction from Wheatley and beyond for traffic travelling towards Islip and the villages on Otmoor.
- (h) At MM17 para.3.point 3 p.72 the Inspector has **deleted** the clear requirement for Oxford City Council and Oxfordshire County Council to **agree** the '*comprehensive masterplan informed by detailed landscape, visual, heritage and ecological impact assessments*'. There should be full consultation with all communities affected by any development on the Land North of Bayswater Brook (including the proposed extension of the Link Road from Bayswater Road north of Sandhills to the A40). But not only should there be consultation. There should be a full requirement of AGREEMENT with all three of the Local Planning Authority, the Oxford City Council and Oxfordshire County Council.....and so far as the Link Road is concerned, with the LPA and Oxfordshire County Council.

Each one of these reasons (a) to (h) alone is sufficient grounds to DECIDE that THE LINK ROAD SHOULD BE REJECTED.

And on the basis of all the problems arising from ACCESS, detailed in nos. (6) to (26) above, we ask that Planning Permission for the proposed development on Bayswater Farm Field should be REFUSED and that BFF should be REMOVED from Strategy 13.

This is in addition to our basic contention that the insertion of BFF into Land North of Bayswater Brook was FLAWED due to its lack of due process and lack of consultation.



(Continue on page 5 if necessary)

If your comments cover more than the boxes provided, please use the space below to provide a summary. You are not required to summarise your comments, but a summary would help us in our reporting.

Please provide your summary below:

MM17 Land North of Bayswater Brook. The Inspector's modifications with regard to access and traffic are largely concerned, either with the proposed Link Road, or with the land on the far side of Bayswater Road, Barton, from SANDHILLS. There is NO specific mention of Bayswater Farm Field at all.

However, the implications for Sandhills of any development on BAYSWATER FARM FIELD (BFF) are severe.

We protest that, in any case, Bayswater Farm Field has been introduced at a late stage, without due process, and with NO s.18 consultation. It is in different site ownership from most of the Land North of Bayswater Brook, will add little to Oxford City's (out-of-date) requirement for affordable housing (and instead to better-off commuter housing), and should be **removed from Strategy 13 with Planning Permission REJECTED**

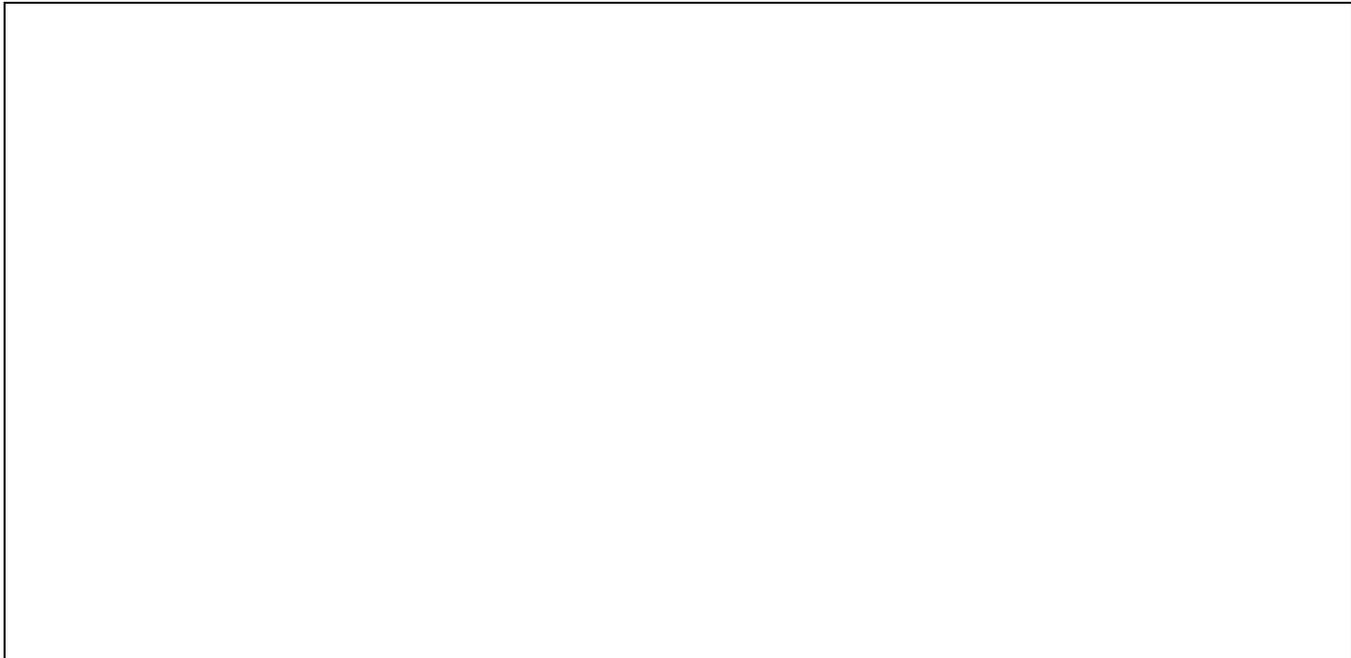
Whether or not the ARROW faintly shown on the Concept Plan attached to the Main Modifications does (or does not) indicate one-way traffic from Sandhills into the proposed BFF housing, there are **VERY SERIOUS TRAFFIC IMPLICATIONS**. They include risks of accidents, tailback queues, noise, air pollution, and carbon emissions, particularly for elderly people and youngsters, and will severely compromise the Supported Home for Independent Living for Vulnerable Adults sited deliberately in the peaceful and safe area close to the bridleway which would now form the narrow link between Sandhills & BFF. **We set out the traffic implications in detail, according to whichever traffic route is being chosen.**

These implications extend also to the already-congested A40 at Thornhill and to the Bayswater Farm Road, Waynflete Road, and Bayswater Road leading up to the Headington roundabout on the A40.

Whichever way the traffic flows from or into Sandhills from BFF, it will **cut across the ancient bridleway** from Barton to Forest Hill which is used considerably each day by people of all age groups, and not least by families with toddlers and babies in buggies accompanying older children to school. The proposals conflict with the NPPF91,92 & 98 requirements to ENHANCE PUBLIC RIGHTS OF WAY and PROVIDE SAFE AND ACCESSIBLE GREEN INFRASTRUCTURE... THAT ENCOURAGES WALKING.

The Inspector's proposed LINK ROAD (MM17 Para 2(vi) p.71, Para 3 (iii) p.72, Para 4.115 p.69) to join the A40 at some unspecified point near Forest Hill has considerable dangers. It too will cut across the ancient bridleway. It will necessitate the building of a bridge over Bayswater Brook, (at what cost? to whom?) destroying the Woodland Priority Habitat there. It will conflict with NPPF143 & 144, being harmful to the Green Belt, damaging biodiversity, wrecking the important landscape triangle between Shotover, Sydlings Copse Triple TSI and Otmoor, impeding vital wildlife and movement corridors, and destroying the *'tranquil area prized for recreational amenity'* which NPPF180b requires to be protected. In addition, if there is a link from the Link Road into the development on BFF itself, then it will add considerably to the Traffic Implications and Dangers through Sandhills and onto the A40 mentioned above.

For all these reasons, we ask that the LINK ROAD be REJECTED and also that Planning Permission for the proposed development on Bayswater Farm Field should be REFUSED and that BFF should be REMOVED from Strategy 13..



Thank you for your comments.

Please return by midnight on Monday 2 November 2020 via email planning.policy@southoxon.gov.uk or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)