

Emerging South Oxfordshire Local Plan Proposed Main Modifications Consultation

Part A - contact details

Q1. Are you responding as an:

Individual

Individual contact details

Q2. Due to statutory planning regulations, a name and means of contact is required for your representation to be considered:

Title	Dr
Full name	Angela Dickinson
Business / Organisation name (if relevant)	-
Job title (if relevant)	-
Address line 1	
Address line 2	
Address line 3	
Postal town	
Postcode	
Telephone number	
Email address	

Part B - your comments

Q5. 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 as amended by Erratum Schedule of Policies Map Changes Sustainability Appraisal Addendum Habitats Regulations Assessment Addendum If you wish to provide comments on more than one proposed main modification or document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:

Schedule of Proposed Main Modifications

Q6. Which Main Modification number or consultation document are you commenting on? 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 click here to view 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

MM2, 4,

Q7. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

Building approximately 8,000 new homes above the requirement to meet the 'housing need' for South Oxfordshire does not minimise carbon emissions and is unnecessary loss of green belt which should only be 'lost' in exceptional circumstances. Thus STRAT 13 is unnecessary and should be REMOVED from the local plan.

As the plan identifies locations over and above what is needed- I call for STRAT 13, the most problematic and environmentally damaging site to be removed from the local plan completely.

Not addressing climate change will subject Oxford and Oxfordshire to further flooding events- and the Bayswater Road frequently floods- affecting movement through the site.

Building in the Green Belt damages the environment and habitats, causes urban sprawl and does not minimise carbon emissions, and in particular will damage the SSSI at Sydtings Copse.

Building on the edge of Oxford e.g. at Land north of Bayswater Brook (LnBB) would increase traffic on local roads, which are already gridlocked on weekday mornings, and residents of Barton spend hours each week trying to get onto the ring road by car, or in stationary traffic on buses further traffic from development of LNBB will cause additional pollution, which will adversely affect school children walking to school and people living in the current estate with respiratory conditions.

There is no public transport or cycleways in the surrounding parishes of Woodeaton, Elsfield, Beckley and Stowood, Stanton St John, Forest Hill with Shotover and the Otmoor Towns and so no alternative to the car for commuting into Oxford and getting around.

The proposed road to access LNBB- with one end at Elsfield and the other at Bayswater Road- will join and create a 'rat run' between 2 already congested roads that are already at capacity. The 'rat run' will create an extra by pass for road users that runs through a housing development – with additional traffic running through Barton and Barton Park.

Road access for the field adjoining Sandhills is shown through two roads- Burdell Avenue and along the private road, via Bayswater Farm Road and then onto Waynefleet Road, this road will link two parts of Oxford that are currently only linked by a bridleway that provides pedestrian access only and thus creates a 'rat run' where traffic could bypass the congested Green Road roundabout and thus having a massive increase in traffic through Sandhills. This traffic would then cross the bridleway at Burdell Ave - creating conflict between cars and pedestrians and having an unintended consequence of forcing more people into cars to take children to school. The Bridleway is currently used by a large number of pedestrians, including children walking to school, and people accessing the green belt for exercise, well-being and leisure.

There is no guarantee that the people who live in the houses at LNBB or any of the other Green belt sites around Oxford will actually work in Oxford and have a reduced need to travel. Current housing being build at Barton Park, is being marketed at London commuters, not Oxford residents, or those in surrounding villages. There is no evidence that this will change.

Q8. If your comments are more than 500 words long, 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.

Building approximately 8,000 new homes above the requirement to meet the 'housing need' for South Oxfordshire does not minimise carbon emissions and is unnecessary loss of green belt which should only be 'lost' in exceptional circumstances. Thus STRAT 13 is unnecessary and should be REMOVED from the local plan.

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Q9. Please upload any supporting documents below:

- File: Angela Dickinson response to Main Modifications.docx

Attachment 1

Angela Dickinson response to Main Modifications to SODC Local Plan 1st November 2020.

23 Greenridges, Barton, Oxford OX3 8PL.

Ref	Modification	Comments
Objective 8.2 Page 23 and Page 28	MM2 Minimise carbon emissions and other pollution	Building approximately 8,000 new homes above the requirement to meet the 'housing need' for South Oxfordshire does not minimise carbon emissions. As the plan identifies locations over and above what is needed- I call for STRAT 13, the most problematic and environmentally damaging site to be removed from the local plan completely.
	MM4 "The spatial strategy supports growth in locations that help reduce the need to travel such as ... allocations adjacent to the City of Oxford"	Not addressing climate change will subject Oxford and Oxfordshire to further flooding events- and the Bayswater Road frequently floods- affecting movement through the site. Building in the Green Belt damages the environment and habitats, causes urban sprawl and does not minimise carbon emissions, and in particular will damage the SSSI at Sydlings Copse. Building on the edge of Oxford e.g. at Land north of Bayswater Brook (LnBB) would increase traffic on local roads, which are already gridlocked on weekday mornings, and residents of Barton spend hours each week trying to get onto the ringroad by car, or in stationary traffic on buses further traffic from development of LNBB will cause additional pollution, which will adversely affect school children walking

		<p>to school and people living in the current estate with respiratory conditions.</p> <p>There is no public transport or cycleways in the surrounding parishes of Woodeaton, Elsfield, Beckley and Stowood, Stanton St John, Forest Hill with Shotover and the Otmoor Towns and so no alternative to the car for commuting into Oxford and getting around.</p> <p>The proposed road to access LNBB- with one end at Elsfield and the other at Bayswater Road- will join and create a 'rat run' between 2 already congested roads that are already at capacity. The 'rat run' will create an extra by pass for road users that runs through a housing development – with additional traffic running through Barton and Barton Park.</p> <p>The document does not show where road access would be provided for the field adjoining Sandhills, but could potentially create a rat run through the existing Sandhills estate and cross the bridleway- creating conflict between cars and pedestrians and having an unintended consequence of forcing more people into cars to take children to school.</p> <p>There is no guarantee that the people who live in the houses at LNBB or any of the other Green belt sites around Oxford will actually work in Oxford and have a reduced need to travel. Current housing being build at Barton Park, is being marketed at London commuters, not Oxford residents, or those in surrounding villages. There is no evidence that this will change.</p>
Page 35	<p>MM5</p> <p>South Oxfordshire Minimum Housing Requirement- 18,600 between 1 April 2011 and 31 March 2035 • 4,950 homes addressing Oxford's unmet housing need</p>	<p>Inaccurate mathematical calculations of unmet housing need in South Oxfordshire and Oxford.</p> <p>This housing requirement is 5,000-8,000 dwellings higher than need for South Oxfordshire</p> <p>The calculations used were out of date – using the 2014 SHMA (Strategic Housing Market Assessment) based on the 2011 census for a Plan that goes to 2035 i.e. 24 3 years difference, when the more recent SHMA 2018 and ONS forecasts show much slower population growth for Oxfordshire and therefore a lower housing need.</p> <p>The same Inspector increased the number of homes to be built within Oxford in their Local Plan, by 2,264 so the number exported to SODC should be 2,686 and not 4,950</p>

<p>Paragraph 2 Page 43</p>	<p>MM9 Policy STRAT6: Green Belt</p> <p>The Green Belt boundary has been altered to accommodate strategic allocations at STRAT13 and ... 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</p>	<p>The amount of land taken out of the Green Belt should be kept to a minimum. If STRAT 13 remains in the plan, only the land required for construction of houses should be taken out of the Green Belt, while green spaces, landscaping and compensatory improvements to the environment should remain within the Green Belt, and no building should be allowed around the SSSI.</p> <p>SSSI Sydling’s Copse.</p> <p>This is a site of particular biological importance and once lost cannot be replaced. The rare and ancient fenland habitat develops over a long time, in very particular circumstances – as such, the National Planning Policy Framework recognises them as an “irreplaceable habitat” and all steps necessary should be taken to prevent loss of this habitat. The unique geology and land structure has created a place for many endangered species to live and the only way to protect it is to remove LNBB from the local plan.</p> <p>Sandhills Fields (East of LNBB)</p> <p>Developments in the field north of Sandhills are likely to permanently alter waterflows into Bayswater Brook, and could damage the Brook’s ecology, in ways that cannot be compensated. There should be firmer language in the Local Plan requiring adequate ‘buffer zones’ to protect streams such as Bayswater Brook and other freshwater habitats.</p> <p>The Brook at this point is of historical interest- having remains of an ancient mill race and sluice gate which formerly fed the Grade II listed Watermill.</p> <p>Raising of the water level could damage the mixed woodland around the Brook. A priority habitat (Magic website- DEFRA)</p> <p>file:///Users/angeladickinson/Desktop/sandhills%20field.htm)</p> <p>Additional run off caused by building on this site would increase water flow through the Brook- potentially increasing flooding upstream onto arable farmland (this land already experiences periodic flooding after heavy rainfall). Additional waterflow, would impact downstream and lead to more regular flooding of Bayswater road as well as putting the existing low lying housing at Barton under threat.</p>
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<p>Main Modification 17: STRAT 13.</p>		
<p><u>Para 2(vi), p71, Para 3(iii) p.72, Para 4.115 p.69</u></p>	<p>Necessary facilities for movement... As a first priority, these should provide high quality pedestrian, cycle and public transport connections into Oxford to maximise the number of trips made by non-car modes, and measures to discourage car based development . If, having taken the impact of these measures into account, significant residual impacts on the highway network are still predicted, new highway infrastructure will be</p>	<p>I believe it is impossible to mitigate against the increase in traffic development of STRAT 13 would involve.</p> <p>New access roads to LNBB and Sandhills Field site would be needed. The geography of the site mean that it is more likely that people will rely on cars. Many people working at the local hospitals work shifts, that mean that public transport is less suitable, and access across the ring road late at night and early in the morning mean that cycling and walking is perceived to be unsafe.</p> <p>The existing transport policy for LnBB recognises that the ring road and the A40/Headington Roundabout are already heavily congested and are gridlocked at peak times, and already require major infrastructure upgrades to alleviate this. Additional car traffic from the development of LNBB, and Sandhills, would make it impassable at peak times.</p> <p>This modified policy is based on ‘sustainable movement measures’ but lacks evidence of effectiveness, and will not prevent an increase in current congestion and will obstruct the timely delivery of highway improvements needed to alleviate traffic not just from LnBB but the other two strategic allocations South of Grenoble Road and Northfield.</p> <p>Importantly this new policy does nothing to overcome the barrier posed by the A40 to travel to and from the site by car, as well as by foot or cycle. There is no improvement that would ensure pedestrians, particularly, but not only women, who feel unsafe using an underpass at night. Barton Park developers promised a bridge over the A40, but this has not happened. There is nothing in the plan to cost for this, or to locate where it could be located. I believe this is unattainable.</p> <p>The Pegasus document underestimates the times of bus travel from Barton into Headington and the City of Oxford. The concept map shows the narrow bridleway at Wick Farm</p>

	<p>required to mitigate those impacts.</p>	<p>becoming a bus route. This would need rebuilding of the bridge that joins this to the main roads of Barton. The intersection of the bridge with the road is a 90 degree bend, so would be difficult or impossible for a bus to navigate. Addition of a bus service through LNBB which then joins existing bus routes through Barton would add considerably to the time taken for bus journeys, and the likelihood of further delays to bus journeys which are already considerable. This makes it unlikely that a bus company would want to operate these routes as they would become economically unviable.</p> <p>The best solution would be not to develop the LNBB STRAT 13 as the infrastructure proposed is undeliverable, unrealistic, uncosted and unmodelled.</p> <p><i>Please revert to the original wording and policy of LP2034 Para 4.115 SODC needs to preserve the policy links to the Infrastructure Delivery Plan. This requires the developer to contribute up to £70 million for necessary highway infrastructure to alleviate congestion on the ring road and the A40/Headington Roundabout. Pedestrian bridge and subway work, would need additional financing.</i></p> <p>We are calling for a 'Community Liaison Committee' to ensure all the local communities are informed, consulted and involved, as they have at Barton Park and suggest this is included. There has currently been NO consultation with residents of Barton, a community that will be most impacted by the SODC local plan.</p>
<p><u>Page 69,</u> <u>Para</u> <u>4.115</u></p>	<p>"Residual trips made by car arising from the development on the surrounding highway network, including on the A40 and Headington Roundabout, could include improvements to the Headington</p>	<p>It is unclear how this would reduce pollution. As many people, including myself stated at the hearing, the issue of air pollution, in particular along the Bayswater Road (but also along other roads passing through Barton) would not be further increased. The traffic at peak times is stationary along these roads, and local school children walk along the footpath to get to school. The local plan needs to address this issue and not further contribute to lung damage to young children who are particularly vulnerable to the effects of air pollution from cars. There is also a care home for older residents and sheltered housing accommodation for older people along this road, many will have lung conditions which can be exacerbated further by increases in air pollution affecting morbidity and mortality of vulnerable residents. Adding housing in Sandhills will also increase traffic trying to access the roundabout, and if it allows traffic access through Barton, would add to traffic along the</p>

	<p>roundabout and its approaches (including bus priority measures); grade separation of the Headington Roundabout; or a new link road between the A40/ B4150/ Marsh Lane junction and the A40 between the Thornhill Park and Ride junction and the Church Hill junction for Forest Hill</p> <p>If more detailed evidence indicates that the required mitigation is a new link road, land will need to be identified and secured for delivery of this in consultation with the</p>	<p>gridlocked Waynefleet Road and past the local primary School (Bayards).</p> <p>It is unreasonable to think that a development of the size of LnBB with 1,100 dwellings and approximately 2,600 + additional people would not generate considerable local traffic. From the 2011 census the households in the adjoining communities of Barton and Sandhills have at least one vehicle per household and some nearer two. It is likely that the residents of LnBB living on the edge of countryside would only want to access Oxford and not the countryside and add pressure to the SSSI.</p> <p>The plan mentions a 'link road', joining the A40 between Thornhill and Forest Hill. This would directly affect countryside access and the public rights of way currently enjoyed by many residents of Barton and Sandhills. The route of this road is not indicated, but it would need to cross the Bayswater Brook and also cut across PROWs including the Oxfordshire Way, and cut off Sandhills and Barton from communities at Forest Hill and Stanton St John.</p> <p>Surely, if the plan is sound- it should have already undertaken this consultation with the adjoining council.</p> <p>I do not believe it is possible to overcome these major issues without adversely affecting the health and well-being of the existing residents of Barton, Wick Farm and Sandhills and the STRAT 13 should be removed from the plan.</p>
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	<p>landowners and the County Council. ... it is anticipated that the main access for the site will come via a remodelling of the Marston interchange with an additional access onto Bayswater Road which will be improved so that the access is safe.”</p>	
<p><u>MM17 Para 3 point 9</u></p>	<p>would allow LNBB to have the same ‘new character’ as Barton Park.</p>	<p>The amended plan specifies higher density housing (more than 45 dph) to the south close to Bayswater Brook (where the land is more prone to flooding) and near Barton Park. The wording on the gradual reduction toward the north and west is also too vague, allowing the developer to keep higher densities over much of the site and increase the number of houses being built.</p> <p><i>SODC should respect the local character (not the character of Barton Park) in the design of LNBB, and that no part of the site should be above 40 dph.</i></p> <p><i>Please make the following wording change (in italics) to this sentence: ‘Densities on both sites will gradually reduce towards the northern landscape buffer and on the main site, densities will be lower close to the landscape buffer by Sidlings Copse and College Pond SSSI and densities will also reduce towards the western edge of the site to avoid interference in the view cone.’</i></p> <p>A buffer zone between other homes and buildings adjacent to and affected by the development including Wick Farm, Stowford Farm, houses in Bayswater Road, those in Elsfield</p>

		parish and those near Bayswater Farm is required to protect current resident's quality of life.
<p><u>MM17 Para 4.111</u></p>	<p>Fails to protect Sidlings Copse and College Pond SSSI by using a substandard ecological assessment which lacks assessment of how effective the measures are to reduce the impact of housing.</p>	<p>The Council's own ecologist warned that the site should not be selected without a detailed and independent ecological impact assessment of the SSSI. Instead, SODC commissioned a short ecological assessment based on a single site visit in February and personal opinion.</p> <p>The report fails to: use all the biological information available for the site; draw on scientific knowledge about the vulnerability of the wildlife, the impact of higher visitor numbers and local residents' use of wildlife sites; and does not estimate the likely impact with and without mitigations to reduce impacts. It fails to meet the requirements of planning legislation (legal compliance with the Strategic Environmental Assessment Regulations) and should account for seasonal variation in wildlife activity at the site.</p> <p>I have undertaken bat recordings at nearby Wick Farm, and detected a range of bat species, that are likely roosting in the SSSI and reliant on trees for hunting and feeding across the LNBB site.</p> <p><i>The Council should change the wording of MM17 para 4.111: Prior to masterplanning, an independent ecologist should carry out a detailed ecological impact assessment (that is compliant with the SEA regulations) to understand the effects of development on the SSSI; masterplanning must take into account the recommendations of this new detailed assessment.</i></p> <p>The Ecological Assessment is flawed and should not be used. There is a serious conflict of interest as AECOM who wrote it are also working for the developers of part of the LnBB. It cites a visitor survey to the SSSI, which does not appear to exist, it recommends any road should be 200m from the SSSI to avoid damage with no evidence base.</p> <p>Another high-quality Ecological Assessment is required, supervised and to the satisfaction of Natural England.</p> <p>Natural England and BBOWT are opposed to the development as it could damage the SSSI [Their Reg 19 responses and Hearing Statement]. Any mitigation policies must be agreed with both organisations.</p>

<p>Paragraph 4 Page 73</p>	<p>An archaeological assessment will need to be evaluation was undertaken during 2020 before the preparation of the masterplan. determination of any planning application for this site. Following this assessment, a A scheme of appropriate mitigation should be established, to include the physical preservation of significant archaeological features and their setting where appropriate</p>	<p>This site has been inhabited since pre-historic times and there are signs of Neolithic and bronze age activity. The report BHE03.1 Heritage Impact Assessment 4 document pages 175-220 (pdf pages 186-231) shows multiple archaeological sites across LnBB. The conclusions “The area of Land to the North of Bayswater Brook appears to be located in an intensive area of archaeology” • Some trenches were dug during 2020, some behind the crematorium and a few elsewhere, but these do not cover the extent of the archaeological sites mentioned in the Heritage Impact Report. No report has been published on the Archaeological Evaluation so its value cannot be assessed. However, it is very unlikely that sufficient assessment has been carried out. • Another report written in 2000 for the gas pipeline5 that has been built across the LnBB site shows a map with many more archaeological sites, at least 21. These were spread all over the site and are unlikely to have investigated. • It would be useful to recommend a full archaeological assessment, since there is little evidence that all these sites have been investigated. An on-site archaeologists and constant archaeological supervision of the construction should be required.</p>
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Comment again, or finish?

Would you like to comment on another main modification or supporting document?

Yes, I'd like to make another comment

Part B - your comments

Q10. 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 as amended by Erratum Schedule of Policies Map Changes Sustainability Appraisal Addendum Habitats Regulations Assessment Addendum If you wish to provide comments on more than one proposed main modification or document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:

Schedule of Proposed Main Modifications

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MM5, page 35

Q12. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

Inaccurate mathematical calculations of unmet housing need in South Oxfordshire and Oxford.

This housing requirement is 5,000-8,000 dwellings higher than need for South Oxfordshire

The calculations used were out of date – using the 2014 SHMA (Strategic Housing Market Assessment) based on the 2011 census for a Plan that goes to 2035 i.e. 24 3 years difference, when the more recent SHMA 2018 and ONS forecasts show much slower population growth for Oxfordshire and therefore a lower housing need.

The same Inspector increased the number of homes to be built within Oxford in their Local Plan, by 2,264 so the number exported to SODC should be 2,686 and not 4,950

Q13. If your comments are more than 500 words long, 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.

No Response

Q14. Please upload any supporting documents below:

No Response

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Part B - your comments

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MM9 pg45 para 2

Q17. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

The amount of land taken out of the Green Belt should be kept to a minimum. If STRAT 13 remains in the plan, only the land required for construction of houses should be taken out of the Green Belt, while green spaces, landscaping and compensatory improvements to the environment should remain within the Green Belt, and no building should be allowed around the SSSI.

SSSI Sydling's Copse.

This is a site of particular biological importance and once lost cannot be replaced. The rare and ancient fenland habitat develops over a long time, in very particular circumstances – as such, the National Planning Policy Framework recognises them as an "irreplaceable habitat" and all steps necessary should be taken to prevent loss of this habitat. The unique geology and land structure has created a place for many endangered species to live and the only way to protect it is to remove LNBB from the local plan.

Sandhills Fields (East of LNBB)

Developments in the field north of Sandhills are likely to permanently alter waterflows into Bayswater Brook, and could damage the Brook's ecology, in ways that cannot be compensated. There should be firmer language in the Local Plan requiring adequate 'buffer zones' to protect streams such as Bayswater Brook and other freshwater habitats.

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The Brook at this point is of historical interest- having remains of an ancient mill race and sluice gate which formerly fed the Grade II listed Watermill.

Raising of the water level could damage the mixed woodland around the Brook. A priority habitat (Magic website- DEFRA)

(file:///Users/angeladickinson/Desktop/sandhills%20field.htm)

Additional run off caused by building on this site would increase water flow through the Brook- potentially increasing flooding upstream onto arable farmland (this land already experiences periodic flooding after heavy rainfall). Additional waterflow, would impact downstream and lead to more regular flooding of Bayswater road as well as putting the existing low lying housing at Barton under threat of flooding. Development in the area should NOT increase the flood risk to current residents.

Q18. If your comments are more than 500 words long, 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.

No Response

Q19. Please upload any supporting documents below:

- File: Bayswater Brook Flooding for SODC MM response.pdf

Attachment 1



Bayswater Road-
Flooding



Bayswater Road
Flooding Oct 2020



Flooding Bayswater
Brook- looking to
Wick Farm Oct 2020



Flooding
Bayswater
Brook onto the
footpath and
into gardens at
Hubble Close



Flooding of field
next to Wick
Farm

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MM 17 Para 2(vi), p71, Para 3(iii) p.72, Para 4.115 p.69

Q22. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

I believe it is impossible to mitigate against the increase in traffic development of STRAT 13 would involve.

New access roads to LNBB and Sandhills Field site would be needed. The geography of the site mean that it is more likely that people will rely on cars. Many people working at the local hospitals work shifts, that mean that public transport is less suitable, and access across the ring road late at night and early in the morning mean that cycling and walking is perceived to be unsafe.

The existing transport policy for LnBB recognises that the ring road and the A40/Headington Roundabout are already heavily congested and are gridlocked at peak times, and already require major infrastructure upgrades to alleviate this. Additional car traffic from the development of LNBB, and Sandhills, would make it impassable at peak times.

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Importantly this new policy does nothing to overcome the barrier posed by the A40 to travel to and from the site by car, as well as by foot or cycle. There is no improvement that would ensure pedestrians, particularly, but not only women, who feel unsafe using an underpass at night. Barton Park developers

Q22. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

promised a bridge over the A40, but this has not happened. There is nothing in the plan to cost for this, or to locate where it could be located. I believe this is unattainable.

The Pegasus document underestimates the times of bus travel from Barton into Headington and the City of Oxford. The concept map shows the narrow bridleway at Wick Farm becoming a bus route. This would need rebuilding of the bridge that joins this to the main roads of Barton. The intersection of the bridge with the road is a 90 degree bend, so would be difficult or impossible for a bus to navigate. Addition of a bus service through LNBB which then joins existing bus routes though Barton would add considerably to the time taken for bus journeys, and the likelihood of further delays to bus journeys which are already considerable. This makes it unlikely that a bus company would want to operate these routes as they would become economically unviable.

The best solution would be not to develop the LNBB STRAT 13 as the infrastructure proposed is undeliverable, unrealistic, uncosted and unmodelled.

Please revert to the original wording and policy of LP2034 Para 4.115 SODC needs to preserve the policy links to the Infrastructure Delivery Plan. This requires the developer to contribute up to £70 million for necessary highway infrastructure to alleviate congestion on the ring road and the A40/Headington Roundabout. Pedestrian bridge and subway work, would need additional financing.

We are calling for a 'Community Liaison Committee' to ensure all the local communities are informed, consulted and involved, as they have at Barton Park and suggest this is included. There has currently been NO consultation with residents of Barton, a community that will be most impacted by the SODC local plan.

Q23. If your comments are more than 500 words long, 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.

No Response

Q24. Please upload any supporting documents below:

No Response

Comment again, or finish?

Would you like to comment on another main modification or supporting document?

Yes, I'd like to make another comment

Part B - your comments

Q25. 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 as amended by Erratum Schedule of Policies Map Changes Sustainability Appraisal Addendum Habitats Regulations Assessment Addendum If you wish to provide comments on more than one proposed main modification or document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:

Schedule of Proposed Main Modifications

Q26. Which Main Modification number or consultation document are you commenting on? 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 click here to view 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

MM17 Page 69, Para 4.115

Q27. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

It is unclear how this would reduce pollution. As many people, including myself stated at the hearing, the issue of air pollution, in particular along the Bayswater Road (but also along other roads passing through Barton) would not be further increased. The traffic at peak times is stationary along these roads, and local school children walk along the footpath to get to school. The local plan needs to address this issue and not further contribute to lung damage to young children who are particularly vulnerable to the effects of air pollution from cars. There is also a care home for older residents and sheltered housing accommodation for older people along this road, many will have lung conditions which can be exacerbated further by increases in air pollution affecting morbidity and mortality of vulnerable residents. Adding housing in Sandhills will also increase traffic trying to access the roundabout, and if it allows traffic access through Barton, would add to traffic along the gridlocked Waynefleet Road and past the local primary School (Bayards).

It is unreasonable to think that a development of the size of LnBB with 1,100 dwellings and approximately 2,600 + additional people would not generate considerable local traffic. From the 2011 census the households in the adjoining communities of Barton and Sandhills have at least one vehicle per household and some nearer two. It is likely that the residents of LnBB living on the edge of countryside would only want to access Oxford and not the countryside and add pressure to the SSSI.

The plan mentions a 'link road', joining the A40 between Thornhill and Forest Hill. This would directly affect countryside access and the public rights of way currently enjoyed by many residents of Barton and Sandhills. The route of this road is not indicated, but it would need to cross the Bayswater Brook and also cut across PROWs including the Oxfordshire Way, and cut off Sandhills and Barton from communities at Forest Hill and Stanton St John.

Surely, if the plan is sound- it should have already undertaken this consultation with the adjoining council.

I do not believe it is possible to overcome these major issues without adversely affecting the health and well-being of the existing residents of Barton, Wick Farm and Sandhills and the STRAT 13 should be removed from the plan.

Q28. If your comments are more than 500 words long, 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.

No Response

Q29. Please upload any supporting documents below:

No Response

Comment again, or finish?

Would you like to comment on another main modification or supporting document?

Yes, I'd like to make another comment

Part B - your comments

Q30. 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 as amended by Erratum Schedule of Policies Map Changes Sustainability Appraisal Addendum Habitats Regulations Assessment Addendum If you wish to provide comments on more than one proposed main modification or document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:

Schedule of Proposed Main Modifications

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MM17 Para 3 point 9

Q32. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

The amended plan specifies higher density housing (more than 45 dph) to the south close to Bayswater Brook (where the land is more prone to flooding) and near Barton Park. The wording on the gradual reduction toward the north and west is also too vague, allowing the developer to keep higher densities over much of the site and increase the number of houses being built.

SODC should respect the local character (not the character of Barton Park) in the design of LNBB, and

Q32. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

that no part of the site should be above 40 dph.

Please make the following wording change (in italics) to this sentence: 'Densities on both sites will gradually reduce towards the northern landscape buffer and on the main site, densities will be lower close to the landscape buffer by Sidlings Copse and College Pond SSSI and densities will also reduce towards the western edge of the site to avoid interference in the view cone.'

A buffer zone between other homes and buildings adjacent to and affected by the development including Wick Farm, Stowford Farm, houses in Bayswater Road, those in Elsfield parish and those near Bayswater Farm is required to protect current resident's quality of life.

Q33. If your comments are more than 500 words long, 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.

No Response

Q34. Please upload any supporting documents below:

No Response

Comment again, or finish?

Would you like to comment on another main modification or supporting document?

Yes, I'd like to make another comment

Part B - your comments

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Schedule of Proposed Main Modifications

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MM17 Para 4.111

Q37. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

The Council's own ecologist warned that the site should not be selected without a detailed and independent ecological impact assessment of the SSSI. Instead, SODC commissioned a short ecological assessment based on a single site visit in February and personal opinion.

The report fails to: use all the biological information available for the site; draw on scientific knowledge about the vulnerability of the wildlife, the impact of higher visitor numbers and local residents' use of wildlife sites; and does not estimate the likely impact with and without mitigations to reduce impacts. It fails to meet the requirements of planning legislation (legal compliance with the Strategic Environmental Assessment Regulations) and should account for seasonal variation in wildlife activity at the site.

I have undertaken bat recordings at nearby Wick Farm, and detected a range of bat species, that are likely roosting in the SSSI and reliant on trees for hunting and feeding across the LNBB site.

The Council should change the wording of MM17 para 4.111: Prior to masterplanning, an independent ecologist should carry out a detailed ecological impact assessment (that is compliant with the SEA regulations) to understand the effects of development on the SSSI; masterplanning must take into account the recommendations of this new detailed assessment.

The Ecological Assessment is flawed and should not be used. There is a serious conflict of interest as AECOM who wrote it are also working for the developers of part of the LnBB. It cites a visitor survey to the SSSI, which does not appear to exist, it recommends any road should be 200m from the SSSI to avoid damage with no evidence base.

Another high-quality Ecological Assessment is required, supervised and to the satisfaction of Natural England.

Natural England and BBOWT are opposed to the development as it could damage the SSSI [Their Reg 19 responses and Hearing Statement]. Any mitigation policies must be agreed with both organisations.

Q38. If your comments are more than 500 words long, 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.

No Response

Q39. Please upload any supporting documents below:

No Response

Comment again, or finish?

Would you like to comment on another main modification or supporting document?

Yes, I'd like to make another comment

Part B - your comments

Q40. 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 as amended by Erratum Schedule of Policies Map Changes Sustainability Appraisal Addendum Habitats Regulations Assessment Addendum If you wish to provide comments on more than one proposed main modification or document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:

Schedule of Proposed Main Modifications

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MM17 Paragraph 4 Page 73

Q42. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

This site has been inhabited since pre-historic times and there are signs of Neolithic, bronze age and Roman activity. The report BHE03.1 Heritage Impact Assessment 4 document pages 175-220 (pdf pages 186-231) shows multiple archaeological sites across LnBB. The conclusions "The area of Land to the North of Bayswater Brook appears to be located in an intensive area of archaeology"

Some trenches were dug during 2020, some behind the crematorium along the Brook, near the SSSI and Wick Farm across to Elsfield, but these do not cover the extent of the archaeological sites mentioned in the Heritage Impact Report. No report has been published on the Archaeological Evaluation so its value cannot be assessed. However, it is very unlikely that sufficient assessment has been carried out.

Another report written in 2000 for the gas pipeline⁵ that has been built across the LnBB site shows a map with many more archaeological sites, at least 21. These were spread all over the site and are unlikely to have investigated. There is evidence of a Roman Villa and a Roman Road passes North/South through the site.

It would be useful to recommend a full archaeological assessment, since there is little evidence that all these sites have been investigated. An on-site archaeologists and constant archaeological supervision of the construction should be required before any development occurs.

Q43. If your comments are more than 500 words long, 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.

No Response

Q44. Please upload any supporting documents below:

No Response

Comment again, or finish?

Would you like to comment on another main modification or supporting document?

No, I'm ready to submit my comments now and finish the survey