**From:** Public Access DC Comments
**Sent:** 28 September 2015 21:53
**To:** Public Access DC Comments
**Subject:** Comments for Planning Application 14/00204/DISC

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:53 PM on 28 Sep 2015 from Dr Sophie Miller.

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| **Application Summary** |
| **Address:** | Islip Station Including Section E Oxford To Bicester Rail Link Bletchingdon Road Islip  |
| **Proposal:** | Partal Discharge of Condition 19 (item2) Detailed scheme of assessment (noise) for section E of 10/00023/TWA.  |
| **Case Officer:** | Linda Griffiths  |
| [Click for further information](http://www.publicaccess.cherwell.gov.uk/online-applications/centralDistribution.do?caseType=Application&keyVal=N8UYNXEM0FZ00) |

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| **Customer Details** |
| **Name:** | Dr Sophie Miller |
| **Address:** | Appleyard, Mill Street, Islip, Kidlington OX5 2SZ |

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| **Comments Details** |
| **Commenter Type:** | Neighbour |
| **Stance:** | Customer objects to the Planning Application |
| **Reasons for comment:** |  |
| **Comments:** | I am writing to express my objection to Network Rail's application for the discharge of planning condition 19 with respect to section E (Islip) of the railway upgrade, in particular the section adjacent to Dr South's School Islip. I am the parent of three pupils at Dr South's school and I am concerned that the consultation period was so short on such a technical matter.As the legal provider of education to all pupils in the school, I hope that the Council will pay due attention to its responsibilities for the education of pupils in its schools when determining planning matters.In this planning matter, the proximity of the new railway to the school is of crucial significance and I am very concerned that Network Rail's proposed noise and vibration mitigation strategy for Islip does not include any mitigation for the school. Whereas sound barriers have been erected further down the line from the school to prevent railway noise from disturbing residents at night, no barriers are proposed along the line adjacent to the school, despite that fact that pupils will be attempting to concentrate and focus on learning throughout the day. I am not clear how Network Rail can estimate that there is an impact on the school grounds but not on the school buildings.Notwithstanding this, the fact that there is a noise impact on the school grounds is of significance in itself. A substantial amount of teaching and learning occurs in the school grounds (including physical education, science, maths, art, drama, technology etc). A body of research has been produced which demonstrates the benefits of outdoor learning (especially at primary level) and it would be grossly unfair for the pupils' learning opportunities to be limited by the excess noise created by the railway. In addition, it is vital the children can hear instructions when using play equipment. The noise levels that are predicted to occur in the playground could prevent this from happening, putting the children's safety at risk.A second factor is the development of the school in the future. When new buildings are required to replace the existing ones, according to DFE guidelines, these cannot be built on areas of school grounds adjacent to the railway (including where one classroom currently is) as the noise level would exceed the permitted limits for new school buildings. At the very least, the school would have to devote substantial expenditure on special sound insulation on any new proximate buildings. It is incomprehensible that the DFE limits are not similarly imposed on new railways built near existing schools (and that residential limits are applied instead) and it is completely unacceptable that the positioning of buildings should be dictated by a railway that postdates the school rather than by the needs of the children or that future public funds should have to be allocated to compensate for excess noise created by the railway.By allowing Network Rail to build a new railway without sound barriers near the school, the council would therefore be unnecessarily significantly curtailing the school's ability to provide the best education for both its current and future pupils.With regard to the noise level in the school buildings, I am concerned that the analysis conducted by Network Rail is too narrow so the Council cannot be confident it will prove correct under all circumstances in future.For example, the noise levels at each receptor point are given as single values, without confidence intervals. I would question why this is the case, as the use of confidence intervals is standard practice in any scientific investigation/study to support the validity of the results and conclusions. Given the proximity of Beech classroom to the area where the noise limit is exceeded, it seems highly likely that the actual noise level in the classroom may indeed also exceed this limit (and confidence intervals may demonstrate the possibility of this). Similarly, the analysis assumes total accuracy of its noise contour map. If this is incorrect by a matter of centimetres, then the noise affecting Beech classroom would breech guideline limits. It is the teaching and learning of children that might be disrupted by high noise levels. The guidance noise limits are already significantly higher than those imposed on new schools built near railways (suggesting learning may already be at risk) and therefore it is vital that learning is not further disrupted because inaccuracies in estimated noise levels provided by the analysis suggest that noise mitigation is not required. It is of prime importance that precautionary measures are taken against any possible inaccuracies to prevent any chance (however small) of excessive noise interfering with their education. Furthermore, the analysis assumes that the railway will have two trains per hour and does not model for increases in the number of trains, despite the high likelihood that there will be heavier use of the line in the future following other railway developments (e.g. East-West link). In recognition of this, a minimum condition of any discharge of condition 19 should be that the number of trains per hour remains at two. Any increase in frequency should require a further planning application.I strongly believe that the Council should adopt a precautionary approach and require Network Rail to install adequate sound barriers between the railway and the school. Every child has a human right to an education and I trust that the council will recognize their duty to give this the highest priority when considering this case. At the very least, the Council must ensure that the noise levels in the school grounds and school building do not exceed the estimates provided by Network Rail by instituting monitoring of noise levels and regular public reporting of these results. Any noise levels exceeding the statutory limit can then be identified and rectified as quickly as possible. |