



The Friends of Old Headington

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Planning Policy
Planning, Sustainable Development and Regulatory Services Oxford City Council
St Aldate's Chambers
109-113 St Aldate's
Oxford OX1 1DS

Dear sir/madam,

Oxford Local Plan 2016-2036: consultation on Preferred Options Response from the Friends of Old Headington

The Friends of Old Headington (FOH) is a charity that exists 'to preserve the rural amenities and village charm of Old Headington and to seek to prevent the village succumbing to urban pressures'. With this in mind the trustees of FOH have the following comments on relevant sections and sites discussed in the Local Plan Preferred Options (LPPO) consultation document. We focus on policy options that affect the Old Headington Conservation Area (OHCA/Old Headington) and on two sites in the Conservation Area, Dunstan Park and Ruskin Fields, that have been identified as potential sites for new housing.

General point

- **Headington Neighbourhood Plan (HNP):** this is not referred to in the document and the relationship between the two plans should be clarified (for example how HNP policies affect LP policies and vice versa). The Neighbourhood Plan refers to the city council's conservation appraisal of Old Headington as defining the character of the village, and so we expect to see protection for the conservation area reinforced at Neighbourhood and Local Plan levels.

Section 4: Securing a good quality local environment

Option 30 on Density and efficient use of land

We agree that 'proposals should make an individual design response to site specific circumstances and surroundings, and that capacity will be guided by the appropriate use for the site'. Conservation Area Appraisals and the Headington Neighbourhood Plan should guide the decision-making process in Old Headington.

Option 31 on the Green Belt

Our view is similar to that stated by the CPRE: the City should protect Green Belt sites from development – to build on them would be damaging and would lead to unjustifiable urban sprawl. We support alternative policies that focus on brownfield sites and sites currently reserved for category 2 employment.



Options 43 and 44 on Air quality assessment and the Air Quality Management Area

We support these proposals which seek to improve air quality and mitigate impacts in new developments; problems in existing areas need to be addressed as well.

Section 5: Oxford's green setting

Option 49 on Managing the overall amount of Public Open Space in Oxford

We favour maintaining the existing ratio of green space per 1000 population. Oxford's population is growing (161,300 according to ONS 2016 estimate), which will lead to a 15% decline in the ratio if the amount of green space is constant.

The Conservation Area Appraisal for Old Headington stresses the importance of green space in and around the village. A drawback for Headington in the plans and maps presented in the consultation document is that the extent of development in Barton Park (which promises to add nearly 900 new homes over the lifetime of the Local Plan) is not shown.



Looking south to Old Headington from Barton Park

This aerial view attempts to address this, and illustrates the opening statement in the appraisal document, 'Old Headington retains the character of a quiet rural village largely built between the 17th and 19th centuries within an attractive green setting despite encroachment by suburban housing from the late 19th to mid 20th century.' The Local Plan needs to be informed of the special case of the OHCA, and we would not countenance the loss of green space at Dunstan Park and Ruskin Field.



Option 50 on Creating a green infrastructure policy designation

We favour including a consultation process through the implementation of this policy particularly as it seems some existing green spaces could be lost in the process, an outcome we would disagree with.

It is also important to take the development of Barton Park into consideration. For example, Sites 203 and 463 (Dunstan Park and Ruskin Field) will be completely enclosed by new building in Barton Park over the coming decade or so, and the need for connected green infrastructure between the new housing area and the local District Centre will become ever greater.

Option 51 on Securing net gain in Green Infrastructure provision, particularly public access to open spaces

We support this in principle, though we need to understand the detail of the city's proposals. For example the meaning of 'Small Park' in this context is not clear.

Option 53 on Biodiversity sites, etc.

We support the preferred options here and would welcome provisions that can better identify the biodiversity etc. importance of sites brought forward for development.

Section 6: Enhancing Oxford's unique heritage

Option 66 on Building heights

We would welcome provision for protection of Conservation Areas, including the use of Conservation Appraisals to help achieve this.

Option 67: Altering existing buildings

We support the preferred option, which will be important in Conservation Areas.

Option 71 on Listed buildings and their setting

We support the option to require assessments be relevant to Oxford and in addition to local character in e.g. Conservation Areas.

Option 72 on Assets of Local Heritage Value

We welcome the proposal to develop a policy based on 'assets of Local Heritage Value': the existing Register appears underpopulated at present and a more proactive approach should be developed. For example in the Old Headington Conservation Appraisal, 'Old Headington Positive Buildings' are identified that would appear to match the proposal, and these could be added to the Register. A similar approach for all Conservation Areas could be developed.



Option 73 on Conservation areas

With some reservation we support the Preferred Option. It is important that Conservation Appraisals inform policy and we would not accept their exclusion if that is the implication here. (Conservation Appraisals are mentioned in the rejected option only.)

We would also recommend the city adopt a policy to introduce Article 4 Direction in each Conservation Area, with residents being consulted in the drafting of policy for each Conservation Area, and implementation funded and administered by the city.

Option 74 on Important parks and gardens

This policy appears to focus on the national register of parks and gardens held by Historic England: there are none in Old Headington. Nevertheless many would regard Bury Knowle Park as an ‘important park’ and we would welcome clarification from the city on the classification of parks and how they are protected.

Section 7: Ensuring efficient movement into and around the city

Option 79 on Transport Assessments and Travel Plans

We support these policies and note the disproportionate impact that increased traffic has in the constricted streets of the Conservation Area. The additional use of Ruskin College as a summer school, for example, has impacts with increased numbers of coaches moving through the area.

Option 80 on Supporting city-wide pedestrian and cycle movement

We support the Preferred Option but emphasise the need to keep cyclists, motorists, and pedestrians in physically separated lanes.

Option 81 on Supporting walking, cycling and public transport access to new developments

We support the preferred option.

Section 9: Sites

Option 107 on Area Action Plans

We support the Preferred Option for Barton Area Action Plan and draw attention to the Inspector’s comments with respect to the inclusion of parts of the Old Headington Conservation Area in part of the Area Action Plan

“This Area Action Plan does not allocate any sites within the Old Headington Conservation Area for development. Any development proposals that come forward within the conservation area would have to demonstrate to the City Council that the statutory requirement to preserve or enhance the conservation area would be satisfied. The City Council will take the same approach when considering any development proposals in the Old Headington Conservation Area as it would in conservation areas elsewhere in the city. Any such proposals will be assessed against the relevant policies of Oxford’s Local Plan particularly policy CS18 of the Core Strategy and saved policies of the Oxford Local Plan 2001–2016; in addition the Conservation Area Appraisal would be a material consideration.”



Site 027: John Radcliffe Hospital Site

Part of the John Radcliffe Hospital Site is located within the Old Headington Conservation Area, including two Listed Buildings and a Boundary Wall. We expect normal considerations for Conservation Areas to apply to applications located in this part of the Site.

Site 054: Ruskin College Campus, Dunstan Rd

Site 203: Dunstan Park

Site 463: Ruskin Field

These three sites are located within the Old Headington Conservation Area and are covered by the Barton Area Action Plan: the Inspector's comments provided for Preferred Option 107, above, apply here as well. The completion of Barton Park over the coming decade will create an increased need for green infrastructure (parks, open spaces, connecting footpaths and cycleways) in this part of the Conservation Area. See also comments on Preferred Options 49 and 50, above.

We are of the opinion that Dunstan Park and the nearby Barton Road recreation ground (site 170) are important spaces whose 'green value' will increase as Barton Park is completed. The Friends of Lye Valley have submitted comments on the biodiversity of Dunstan Park and recommend that the site could be used to restore lost important species, enhancing biodiversity. We commend their comments on this site.

Ruskin Field has been proposed for development previously and proposals were defeated because they did not 'demonstrate ... that the statutory requirement to preserve or enhance the conservation area would be satisfied'. The Inspector also stressed that 'the Conservation Area Appraisal would be a material consideration' in assessing new proposals. The city's site assessment stresses the impracticalities of development on this land with limited access for transport – access via the ring road is ruled out, and Stoke Place would not be appropriate, delivering traffic to a part of the village with narrow roads and already at full capacity.

The northern edge of the Conservation Area – from Dunstan Park in the west to Oxford Preservation Trust land in the east – is an important component of 'the rural amenities and village charm of Old Headington' and in seeking 'to prevent the village succumbing to urban pressures', the Friends of Old Headington would oppose developments through this area.

Yours sincerely,

Peter S. McCarter,
Chairman, Friends of Old Headington