



Application:

Stance: \* Object

Reason for comment:

- ✘ Amount of development on site
- ✘ Effect on adjoining properties
- ✘ Effect on character of area
- ✘ Effect on privacy
- ✘ Effect on traffic
- ✘ General dislike for proposal
- ✘ Local plan policies (Oxford Local Plan and Headington Neighbourhood Plan)
- ✘ On-street parking
- ✘ Open space provision
- ✘ Other – the site is not a residential garden; conflict with National Planning Policy Framework (NPPF) in terms of heritage assets (significant buildings within the Headington Conservation Area)
- ✘ Parking provision

I am writing in my capacity as Chairman of the Trustees of the Friends of Old Headington with respect to application: **18/02588/FUL | Erection of 3 x 3-bed dwellings (Use Class C3) and alterations to the width of the existing entrance on the west boundary wall. Provision of shared forecourt, private amenity space, parking and bin and cycle stores. Associated landscaping. | Meadow Larkins Larkins Lane Oxford OX3 9DW**

It is the unanimous view of the Trustees that they cannot support the proposal. Firstly, the site is an orchard (essentially part of adjacent green fields) rather than a residential garden (as claimed in the application) and therefore does not benefit from Policy HP 10. This fact alone should invalidate the proposal. And there is no local plan policy to support building on this site.

In addition, the proposed development is too dense and suburban for the setting in the Old Headington Conservation Area: it would detract from local character and identity.

We are also concerned about the traffic, road safety and pollution implications of a development that, along with the existing Meadow Larkins house, will have 11 parking places (two existing and nine in the planning proposal). Larkins Lane is effectively a single-track road and there is little space for pedestrians. The movement of delivery vehicles will also increase.

The proposed development does not address green space policies enumerated in the Headington Neighbourhood Plan – indeed it does not refer to the HNP at all. Furthermore, the planning inspector's report on proposals to add nearby Ruskin Fields to the development of Barton Park in 2012 emphasised the need to protect against 'an adverse impact on the distinctive character of the Conservation Area', an argument that we believe applies to the present site.

More detailed comments follow.

#### *The site*

The Meadow Larkins site lies within the domain of the historic Mathers Farm which dates from the C17. In the Old Headington Character Appraisal the site is part of the St Andrew's Lane and Larkins Lane Character Area and is described as 'comprising former farm buildings', and the site's orchard provides an open aspect to the Green Fields Character Area, an area that 'includes the remnants of the agricultural land on the edges of the historic village'.

#### *The wider effects on the Conservation Area*

Remarks made by the planning inspector considering the proposal to add Ruskin Fields (to the west, but also a green part of the Conservation Area) are pertinent in considering this application. She said in paragraph 32 of her 14/11/2012 report to the city council,

'[that the Fields] create an important open setting to the tightly knit historic core of the Conservation Area that is fundamental to its intrinsic character. Whilst development could feasibly be designed and laid out to preserve the appearance of the Conservation Area and to safeguard the ecological importance of the hedgerows and trees that form the Fields' boundaries, development, no matter how sensitively designed, would inevitably result in the reduction of and would be intrusive in views of this green wedge and would have an adverse impact on the distinctive character of the Conservation Area. I conclude that such harm to the Conservation Area would not be outweighed by the individual or cumulative benefits of affordable housing and open space provision and improvements to pedestrian and cycle links.'

By the same argument it can be fairly said that Meadow Larkins is an important site to the east side of the village, important at the boundary of the Larkins Lane and Green Fields Character Areas. The new development is intrusive in scale and design, changing as it does the agricultural feel to this part of Old Headington.

The planning proposal makes no reference to Headington Neighbourhood Plan Policies and we review relevant sections below.

#### *Effects on Character & Identity in Old Headington*

The Old Headington Conservation Area is one of the Character Areas listed in the Headington Neighbourhood Plan (HNP, adopted by Oxford City Council in July 2017), and the Character Appraisal completed in 2011 is referenced as the key document for the Old Headington Character Area in the Neighbourhood Plan.

The submitted Design and Access statement does not reference nor address HNP Character and Identity policies, designed to protect areas within the Neighbourhood Plan.

- CIP1: Development to respect existing local character

It is our view that the proposed development is too dense for the site and inappropriate in scale. There is a sense of cloned modern designs dropped in to the space, with no variety. The east-facing aspect of the proposed houses will be intrusive and visible from the fields to the east and from view points along Barton Lane. The arrangement of the three houses amounts to tandem development, contrary to the grain of the village in this part of Old Headington (which is a single line of cottages facing the rural lanes). Overall, the proposal fails to respect the character and appearance of the site and is contrary to national and local plan policy.

- CIP2: Protecting locally important views

The HNP requires that ‘Development will seek to protect important views within Headington itself’. The destruction of the orchard site will result in housing being visible from the east and along Barton Lane. Views from Larkins Lane will also be lost, although the application claims, wrongly, that the gaps between the proposed houses will maintain the views.

- CIP3: Innovative design

We do not think the proposals ‘respect and take account of local heritage’; neither do they ‘enhance the distinctive identity, character and setting in terms of scale, layout, density, orientation and massing’. We find the plans suburban and uniform.

- CIP4: Protecting important assets

The policy here states, ‘Where the significance of a heritage asset, either designated or non-designated, would be affected by a development proposal, that development proposal will only be permitted where it addresses the conservation and enhancement of the significance, character and any special architectural or historic features of significance the asset may possess.’

The Old Headington Character Assessment lists what it calls ‘Positive Buildings’, which have the status of non-designated heritage assets. The site, along with Mathers Barn, comprises agricultural buildings. In addition, this part of Larkins Lane includes old high walls, vernacular farmhouse and cottages, and the adjacent green fields. We don’t see anything in this proposal that enhances ‘the significance, character and any special architectural or historic features of significance’ at the site.

### *Green Spaces policies*

These exist in order to increase and enhance green space within the HNP Area: ‘The aim is the greening of Headington through policies designed to protect and enhance green space and biodiversity. These policies provide for the protection and extension of green spaces including parks, trees and allotments, the protection and enhancement of the green setting including verges and non-designated public access green space and the protection and enhancement of biodiversity and conservation sites.’

The present proposal removes green space and does little to remedy the situation after development. In particular we note:

- GSP2: Provision of Green Space within Developments

This policy requires the submission of a Biodiversity Enhancement Plan; none has been submitted.

- GSP3: Conserving and Enhancing Biodiversity

According to the HNP, GSP3 seeks to protect and enhance biodiversity on both designated and non-designated sites in Headington in accordance with the Green Strategy Objective 21 which seeks the “protection of important and prosaic species in all sites.” The Design and Access statement is dismissive of ecological concerns and ignores the Meadow Larkins orchard and the variety of trees and plants that will be destroyed as a consequence of development.

- GSP4: Protection of the Setting of the Site

The HNP says, ‘Development will be permitted where its design responds appropriately to the site and character of the surrounding area’. The proposed intrusion of modern buildings in too great density is not appropriate to the site and the surrounding Green Fields Character Area. As development increases outside the ring road, green spaces within will become ever more important.

### *Traffic*

The proposal in its present form specifies parking for 11 spaces on the Meadow Larkins site – two for the existing property and nine for the new development. This space, effectively a car park, will be detrimental to the rural appearance of the present site. Eleven vehicles – double the current

number - will have to use the junction at St Andrew's Road, Barton Lane and Old High Street. Visibility to Barton Lane is limited and extra traffic movements here will present a hazard to other road users as well as generating more pollution through vehicle emissions. To this end we also note there is no provision in the planning proposal to support or encourage the use of electric vehicles.

Oxfordshire County Council have noted in their response that the site is under-provided for bicycle storage.

As a final comment we note the detailed and historically informed views expressed by neighbours, who have their own concerns about the impact of the development. We cannot enumerate these here, but we do feel it is important that they are accommodated.

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The Friends of Old Headington (FOH) was formed by a group of local residents in 1959 to protect the special character of Old Headington village, what is now the Old Headington Conservation Area. FOH is an active membership organisation with elected trustees which meet regularly to promote our aims, organise local community events, including an annual AGM.

The Aims of the Friends of Old Headington include

- **retaining Old Headington as a village, with special emphasis on preserving its lanes, walls, grass verges, and trees;**
- **ensuring that new buildings and alterations are in keeping with the existing character of the village;**
- co-operating with the Oxford Preservation Trust and the City Council in their declared policy of preserving the village; and
- involving as many as possible to achieve these aims successfully