

Oxford Local Plan 2036

Proposed Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name:

Organisation (if applicable):

Address:

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Date:

Data protection:

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2036 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2036 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

- If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.
- If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

Do you wish to speak at the examination hearings?

(Please note that the Inspector will decide who to invite to speak)

Yes No

Do you wish to be notified when:

the Council submit the Oxford Local Plan 2036 to the Government?

the Inspector's Report is published?

the Oxford Local Plan 2036 is adopted by the Council?



The Friends of Old Headington

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RESPONSE TO THE CONSULTATION ON THE DRAFT OXFORD LOCAL PLAN, DECEMBER 2018

The Friends Of Old Headington support and agree with the comments and conclusions made by Headington Neighbourhood Forum and Headington Action in their submission by email on 23 December 2018.

Their submission concluded that they considered the draft Oxford Local Plan was unsound as:

1. It does not conform to the Government's guidance on the preparation of Local Plans.
2. There has been no process for resolving policy conflicts with the Headington Neighbourhood Plan.
3. The Planning Authority has not given proper regard to representations made when preparing the Local Plan (2036).
4. The Local Plan (2036) policies are in conflict with the Neighbourhood Plan policies and there is no account as to how this conflict has been resolved.
5. It lacks a detailed account as to how the conflict between policy SP57 and the Headington Neighbourhood Plan policies has been resolved.
6. It lacks a detailed account as to how the conflict between policy SP62 and the Headington Neighbourhood Plan policies has been resolved.

The Friends have specific comments on policy SP57, Ruskin Field:

Planning permission will be granted for expansion of the adjoining academic institution or residential use only, which may include employer-linked housing. Planning permission will not be granted for any other uses. New development should be informed by the landscape character and potential impact on views from the north in terms of choice of siting, height, form and appearance. Careful design must ensure that development proposals contribute towards the character of the conservation area and preserve and enhance nearby listed buildings and their setting.

The policy is in conflict with the Headington Neighbourhood Plan, which includes the Conservation Area Appraisal as part of the Character and Identity policies section (see <http://headingtonplan.org.uk/archive/char-ass-2/CA5r.pdf>).



We note that the size of the proposed site has reduced in scale from site 463 in the preferred options document to that proposed in SP57. This presumably reflects the rejection of Ruskin Fields as an option for the Barton Area Action Plan, where the Planning Inspector wrote (paragraph 32, Oxford City Council Barton Area Action Plan Local Plan, Inspector's Report November 2012)

Ruskin 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. Consequently, I further conclude that allocation of land at Ruskin Fields would be inappropriate and unjustified, and would therefore be unsound.

The remaining field that comprises SP57 is an integral part of the rural setting north of Ruskin College and should be afforded the same protection as the fields adjacent to the ring road. These protections are covered by HNP policies

- **GSP4 Protection of the setting of the site** is critically important for this site and for the Conservation Area. From the Old Headington Character Appraisal (OHCA), page 27:

View type E: Views across fields to landscape beyond the conservation area: Despite its location within the city, the village has thus far retained a rural setting in the form of small fields to the north, as well as visual connection with the countryside beyond the ring road. Views from ... the bridleway at Stoke Place include the small fields within the conservation area as a rural foreground. ... The connection of the rural foreground and background of the South Oxfordshire countryside provides a visual connection from the conservation area to the wider rural setting, which is a key feature of the character of Old Headington.
- **CIP1 Development to respect existing local character** - an important consideration for any development in the Conservation Area, especially in the case of this site which is adjacent to the College and to rural views. The Stoke Place footpath and bridleway 'runs between small fields illustrating its historic function as an access way from the village to fields in the rural hinterland' (OHCA, page 23).
- **CIP2 Protecting locally important views.** While Stoke Place is not identified on the Headington Neighbourhood Plan viewpoint map, nevertheless the views here, through and down past the College grounds are important, and this part of Headington is also touched on by the Elsfeld View Cone for Oxford. The OHCA states the importance of the setting in this part of the village in a number of ways, for example:



Trees of the rural landscape: The network of hedgerows around the small fields in the north of the conservation area contains numerous trees. These have grown up, or were planted, as hedgerow trees that were managed in the past both as a means of providing stock enclosure and as a long-term timber crop. At Stoke Place they have grown up to line the bridleway running down the hill.

- **CIP4 Protecting important assets** speaks to the need for developments to respected assets of all designations, including Listed Buildings that are nearby, including Ruskin College, its parkland grounds and the Crinkly Crankly garden wall. OHCA states,

Stoke Place is continued within this area as an attractive public bridleway running northwards from the Dunstan Road Character Area lined by trees that help green it. The bridleway runs up to the ring road between land owned by Ruskin College and other privately owned fields. To the west, iron railings with an unusual gate form a distinctive boundary to Ruskin College's land, allowing views across it to the countryside beyond. ... The ability to walk just a few hundred yards from the tightly enclosed village centre to a point with such a rural character and wide open views over the landscape is an important part of the special character of Old Headington. ... The ring road and the adjacent footpath and cycleway run along the edge of this area, allowing glimpsed views through the hedgerows and tree-lines up to the village. In particular these views cross the land owned by Ruskin College with Ruskin Hall forming a prominent feature.

Accordingly we agree with the conclusion of Headington Neighbourhood Forum and Headington Action that

The Local Plan (2036) is unsound as it lacks a detailed account as to how the conflict between policy SP57 and the Headington Neighbourhood Plan policies has been resolved.

Howard Stanbury
Secretary, Friends of Old Headington