

# View Response

## Response Details

**From** Mark Patt

**Date** Started: 27 Mar 2020 09:27. Last modified: 27 Mar 2020 09:27

**Status** Complete

**Email Address** [Redacted]

**Postal Address** [Redacted]  
Headington

**Postcode** [Redacted]

**Areas of Interest**

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

**Survey Types**

- [Redacted]
- [Redacted]

**Response ID** #798358

**Visibility** Unknown.

## Question 1.

**Your Name:**

You must provide an answer to this question.

Mark Patt

## Question 2.

**Your organisation (if applicable):**

None

## Question 3.

**Your Address:**

You must provide an answer to this question.

[REDACTED]

Headington

## Question 4.

**Your email address:**

You must provide an answer to this question.

[REDACTED]

## Question 5.

**Do you wish to be notified when the Oxford Local Plan 2036 is adopted by the Council?**

You must provide an answer to this question.

Yes

No

## Question 6.

### **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 Main Modifications Consultation only, and we will only store your data until the Oxford Local Plan 2036 is adopted. Information you give in this form will be shared with the Independent Examiners.

**Please note: Anonymous representations may not be accepted.**

Select at least 1 option.

Select this box if you are happy for us to state your name and the first line of your address and postcode when publishing your response(s).

Select this box if you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured.

## Question 7.

**To which Modification(s) or part(s) of the Sustainability Appraisal does this response relate?**

You must provide an answer to this question.

Refer submission made via email 03:33 27/03/20 (which may indicate to you how difficult it is to find time for this)

## Question 8.

**Do you Support or Object the proposed modification(s)?**

You must provide an answer to this question.

Support

Object

## Question 9.

**If you object, please state why:**

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182). Please tick any which apply:

Not positively prepared - i.e. the strategy will not meet development needs

Not justified - i.e. there is no evidence to justify the modification

Not effective - i.e. it won't work

Not consistent with national policy - i.e. does not comply with the law

## Question 10.

### **Reason for SUPPORT or OBJECTION:**

Please give details to explain why you support or object to the wording of the Modification(s) or part(s) of the Sustainability Appraisal of the Main Modifications.

You must provide an answer to this question.

Please refer to attached submission

## Question 11.

### **Summary of Representation:**

If your reason for support or objection is longer than 100 words, please summarise the main issues raised.

Please refer to supplied objection

# Local Plan 2018 Main Modifications Objection

By Headington Heritage

24/03/2020

(Click on items in table of contents to navigate)

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Comments in blue below, otherwise extracts from plan text.

## Policy M3: Motor Vehicle Parking

Planning permission for non-residential redevelopments will only be granted if it is demonstrated that there will be no increase in parking provision.

Planning permission for additional parking provision within new developments will only be granted for spaces that are designated for disabled people, car clubs or where it can be demonstrated that there are essential operational or servicing needs (identified in the supporting TA and TP).

This is completely ineffective, basically allowing any developer to claim extra parking on the grounds that there are “operational needs” of a new development, this is disastrous for Oxford, the environment and the amenity of Oxford residents – every below just becomes fluff. It is really unclear whether, for example, a new building on an existing site would be redevelopment or new development. What does “additional parking provision” mean? Should it simply read “parking provision” additional to what?

Nothing after the above will survive a developer legal challenge as it is ineffective “nice to have” reliant on the goodwill of the developer and a developer paid-for and created traffic management plan. NO increase in current traffic can be permitted.

This is very substantial change from the original policy that has not had a public hearing, it is disappointing after strong representations from both Councils and others.

The parking requirements for all non-residential development, whether expansions of floorspace on existing sites, the redevelopment of existing or cleared sites, or new non-residential development on new sites, will be determined in the light of the submitted Transport Assessment or Travel Plan, which must take into account the objectives of this Plan to promote and achieve a shift towards sustainable modes of travel. The presumption will be that vehicle parking will be kept to the minimum necessary to ensure the successful functioning of the development.

“Take into account” is so weak language it is practically meaningless.

In the case of the redevelopment of an existing or previously cleared site, there should be no net increase in parking on the site from the previous level and the Council will seek a reduction where there is good accessibility to a range of facilities.

Where the proposal is for the expansion of an existing operation on an existing large site, a comprehensive Travel Plan should be submitted that looks at the development in the context of the whole site, and demonstrates that opportunities will be sought to enhance and promote more sustainable travel to and from the wider site. The Travel Plan will be kept under review to ensure that future opportunities to encourage a shift towards sustainable modes of travel are taken.

## Policy RE4: Sustainable and foul drainage, surface and groundwater flow

4.22 Where development proposals require a Foul and Surface Water Drainage Strategy, evidence should be provided within this strategy that demonstrates agreement between the developer and

1912 -  
80.1 -  
MM32/  
M3

1913 -  
80.2 -  
MM17/  
RE4



sewage undertaker on the available infrastructure capacity to accommodate the additional foul water. It may be appropriate to phase development so that initial additional flows from the proposed development do not exceed the capacity available prior to upgrading of the foul drainage network. Up to three years lead in time could be required to undertake such works.

#### **Policy RE4: Sustainable and foul drainage, surface and groundwater flow**

*Insert following wording at the end of policy:*

##### **Foul Drainage**

Developers are encouraged to separate foul and surface water sewers on all brownfield sites delivering new development. For clarity this does not include householder extensions or conversions that input into the existing network.

A Foul and Surface Water Drainage Strategy must be provided for all new build residential development of 100 dwellings or more; non-residential development of 7,200sqm or more; or student accommodation of 250 study bedrooms or more.

....Applicants must demonstrate that they compliance with have had regard to the SuDS Design and Evaluation Guidance SPD/TAN for minor applications development and Oxfordshire County Council guidance for major development. Applications.

##### **Discharge into SSSIs Not Accounted For**

The policy does not take account of substandard mixed (foul and storm) drainage which discharge into sensitive areas such as the Lye Valley – the level of discharge is already excessive both in terms of volume, causing incision of the base of the Lye Brook, which has and will lead to fen damage, and content in that foul water discharges into the SSSI – special measures must be in place for this.

The following amendments are required:

Additions to the Policy Map is required to delineate:

- The natural ground and surface catchment of SSSIs eg: Lye Valley
- The area over which substandard mixed sewage and foul drains discharge into the Lye (or other)

Any development within the policy map MUST have:

- SUDS
- Separate discharge of foul and storm water

The policy is therefore unacceptable as it stands.

## Policy G1: Green and Blue Infrastructure Network

The Council has failed to take a strategic view of green space and has allocated sites in Cowley piecemeal without calculation of the overall green space deprivation of the area – the so called green/blue network is mostly on land that cannot be built on – Oxford now has almost no green space remaining where citizens can exercise etc.

## Policy G2: Protection of biodiversity and geodiversity

Sites and species important for biodiversity and geodiversity will be protected. Planning permission will not be granted for any development that would have an adverse impact on sites of national or international importance (the SAC and SSSIs), and development will not be permitted on these sites, save where related to and required for the maintenance or enhancement of the site's importance for biodiversity or geodiversity. **Development proposed on land immediately adjacent to the SSSIs should be designed with a buffer to avoid disturbance to the SSSIs during the construction period.**

*“that would have an adverse impact on sites” should read as per the current Local Plan, ““where it can be **PROVEN** have an adverse impact on sites”*

The plan is ineffective as it is not clear where the onus of proof is, which should be on the developer. Once foundations or ground disturbance occurs, it is irreversible.

### Buffer Zone

This is nonsensical in the case of the Lye SSSI where the primary issue is the quality, exact chemical composition and quantity of water reaching the fen, no statement is made about protection of flows during construction.

On sites of local importance for wildlife, including Local Wildlife Sites, Local Geological Sites and Oxford City Wildlife Sites, **on sites that have a biodiversity network function**, and where there are species and habitats of importance for biodiversity that do not meet criteria for individual protection, development will only be permitted in exceptional circumstances whereby:

1. a) there is an exceptional need for the new development and the need cannot be met by development on an alternative site with less biodiversity interest; and
2. b) adequate onsite mitigation measures to achieve a net gain of biodiversity are proposed; and  
c) where this is shown not to be feasible then compensation measures will be required, secured by a planning obligation.

## Policy SP20: Churchill Hospital Site

I can't see any reference to the Lye SSSI – is it in the main policy?

1914 -  
80.3 -  
MM19/  
G1

1915 -  
80.4 -  
MM20/  
G2

1916 -  
80.5 -  
MM77/  
SP20

## Policy AOC6: Headington District Centre

1917 -  
80.6 -  
MM43/  
AOC6

*Planning permission will only be granted for new development within the district centre **area of change** where it can be demonstrated that it **would** takes opportunities to deliver the following, where relevant:..*

Bury Knowle Park has been now included in the area of change – this is the last remaining piece of green space in the area and must wholly and conclusively EXCLUDED from any change.

As it is now part of the Blue/Green network, it should be excluded from the area of change comprising the Headington District Centre

## Policy SP42: John Radcliffe Hospital Site

1918 -  
80.7 -  
MM53/  
9.217

The Oxford University Hospitals NHS Trust is confident that their future operational requirements can be met on the site through redevelopment and by making more efficient use of land. Some areas of the site will no longer be required by the Trust for hospital uses and will become available for alternative uses. Proposals must consider their impact upon the Old Headington Conservation Area, **ensuring that their design complies with the requirements of Policy DH3.**

“Consider impact” is ineffective – this is weaker than the usual statement around Conservation Areas to “enhance and protect”. The JR is PART of the Conservation Area with the boundary going through the site including the original JR buildings.

## Policy SP57: Ruskin Field

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

Good as far as it goes, but immediate views, ie from 5m away from Stoke Place are of far greater importance as this is the only accessible access to the tiny fragment of countryside accessible due to the blocker effect of the nearby A40. There will be impact so the word potential is redundant.

As previously stated, this should not be developed for reasons given in submissions and at the hearing.

1919 -  
80.8 -  
MM112  
/SP57

## Policy SP62: Valentia Road Site

1921 -  
80.9 -  
MM117/  
SP62

Planning permission will only be granted for housing on this site. **The minimum number of homes to be delivered is 12. Other complementary uses will be considered on their merits.** Planning permission will not be granted for any other uses. Improvements to the remaining area of recreation ground will be required as part of any development on the site.

This is contrary to requirements of the Headington Local Plan and removes even more green space from the community NO minimum size of retained green space is specified therefore it is ineffective, previously site allocations have specified the area to be retained eg: 50%. The remaining land should be designated green space.

Thanks

Mark

Headington Heritage, A personal blog

Visit : [www.headingtonheritage.org.uk](http://www.headingtonheritage.org.uk)

[REDACTED]

[REDACTED]