

Main Matter 1: Procedural/Legal Requirements

Representor 202 - Headington Heritage/Mark Pott

Introduction

This representation is intended to address general scope issues required for the June 11th Initial Hearings, with references to the main representations where appropriate.

All page references are found by “Go to page” functionality in PDF readers, not the table of contents page.

Main Points Addressed

Plan preparation and scope

- 2. Have requirements been met in terms of the preparation of the Local Plan, notification, consultation and publication and submission of documents?*
- 5. What existing and proposed Supplementary Planning Documents (SPD) are there? What is the intended relationship of SPDs with specific policies in the Local Plan and what purpose will they serve? Is this clear and appropriate?*

Habitats Regulations Assessment

- 12. What issues were raised by Natural England and how have these been addressed/resolved?*
- 13. In terms of the approach to “in combination” effects, what is the current position of Natural England and the Council.*
- 14. Is the Council’s position justified?*

Sustainability Appraisal

How and when were options considered for:

- 7. b) The distribution of development*

Other matters

- 17. Does the Local Plan include policies in relation to the mitigation of and adaptation to climate change? If so, which?*
- 19. How have issues of equality been addressed in the Local Plan?/ 17.b Distribution of Development*

The Lye Valley SSSI (Lye Fens)

The Natural England representation addresses the Lye Catchment as below:

Policy SPE 6- Churchill Hospital, Policy SPE 7- Nuffield Orthopaedic Centre, Policy SPE 8- Warneford Hospital, Policy SPS 11- Cowley Marsh Depot, Policy SPS 16- Crescent Hill, Policy SPS18- 474 Cowley Road & Policy SPS1 ARC Oxford.

The Lye Valley is a precious calcareous fen dependent on the quality (calcareous) and quantity of the groundwater reaching it at the top of the valley slopes, this in turn is dependent on the degree of development in a now highly urbanised catchment.

Large sites such as the Churchill Hospital and the Nuffield are important, but the cumulative effects of household development with increasing intensification of development and the effects of climate change are of great importance.

The draft Local Plan fails to address the Lye Valley catchment protection as a main matter, relying mainly on specific site policies.

The following is required:

- An updated scientific analysis of the ground, surface water catchments of the Lye and other calcareous fens around Headington as per Lamberth to provide a clear basis for restrictions to be imposed, and Lye Valley SPD to inform future development.
- A non-site specific overarching policy for the management of groundwater and catchment protection both at the Lye and at other hydrologically sensitive sites.
- An urgent Article 4 direction to restrict or assess householder development. This affects the **SCOPE** of the Local Plan therefore is appropriate for discussion at the initial hearings, as currently much deleterious permitted development is out of scope of the Local Plan.

How will the Local Plan be modified with new policies based on evidence from the assessments/hydrological survey done?

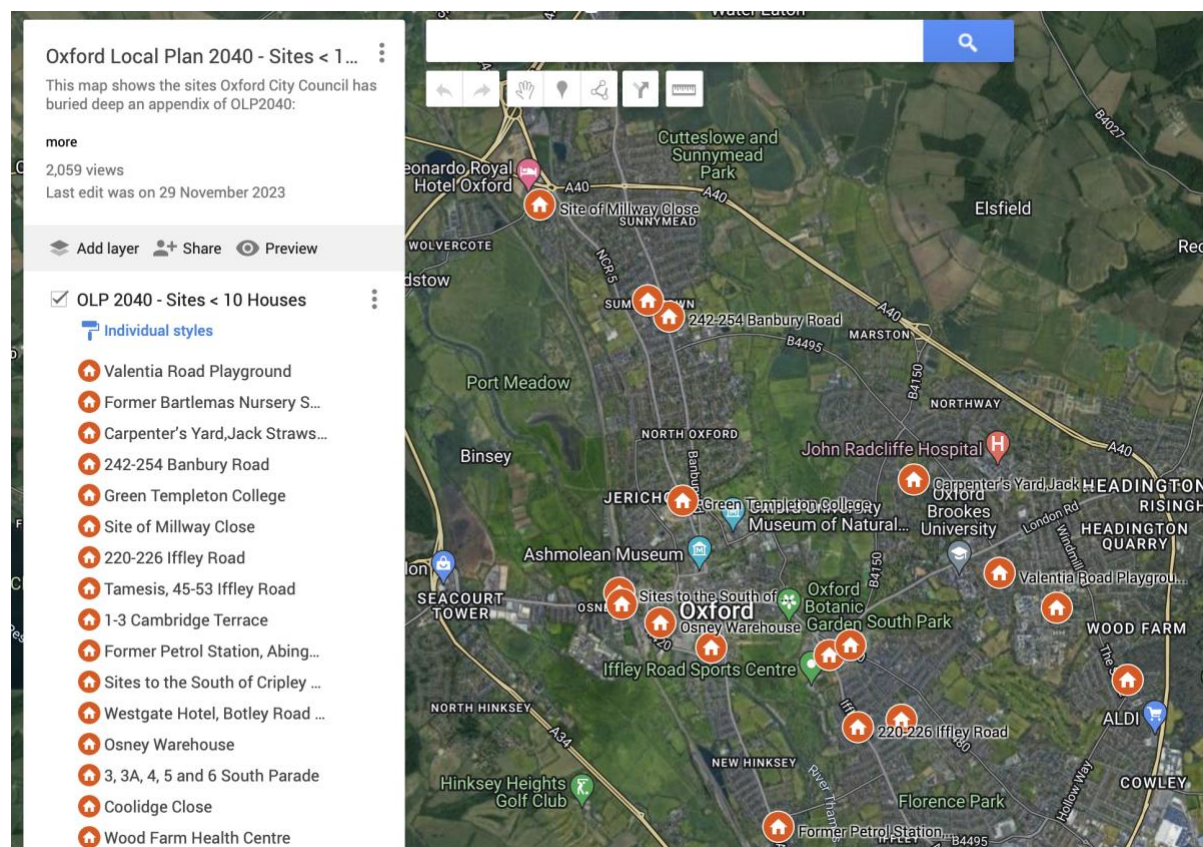
For further details please refer to:

202 - Headington Heritage Part 1 - PDF p.19 Para :POLICIES G6/G7/G8” and PDF p.44 Section: APPENDIX – THE LYE VALLEY.

NPPF Guidance to Include Sites of > 5 Houses Ignored

The Government Planning Practice Guidance advises sites of 5 units or more should be included in Housing and Economic Land Availability Assessments, but Oxford City Council has excluded all sites from a Site Assessment under 10.

This affects the **SCOPE** of the Local Plan so should be addressed at this stage.



Sites excluded from the Local Plan Due to < 10 houses, not 5 as per NPPF Guidance

Oxford City Council List

https://www.oxford.gov.uk/downloads/file/8624/helaa_2023_appendix_c_-_sites_with_capacity_less_than_10_dwellings

Valentia Road (SP2036 SP61)

The playground at Valentia Road is heavily used in an area of green space deprivation in the Lye Valley Catchment and will NOT receive a site allocation due to policy above.

It is imperative this be brought into scope as it should be rejected for reasons above.

Ref: 202 Headington Heritage Part 1 PDF p.9 (Unsound policy) and p.34 (Site).

Other Procedural Matters

Equality Issues

Development proposals fall disproportionately on the poorest communities and no scientific assessment of this has been conducted since the Green Infrastructure Survey of 2007, and the Council still assesses green space loss on a site-by-site basis rather than the overall strategic loss to the community.

The Council must:

- Identify green space per “Urban Village” rather than site by site
- Update the plan map to address the many deficiencies identified

Ref: 202 Headington Heritage Part 1 PDF p.13.

Headington Local Plan

The destruction of much surrounding countryside and rapid population and employment growth means the Local Plan needs revisiting to address the increasingly critical green space provision and environmental pressure on the Lye Valley SSSI.

Ref: 202 Headington Heritage Part 1 PDF p.12.

Conservation Area Appraisals

The Conservation Area appraisals (eg: Old Headington, Iffley etc) appear to be missing from the examination library, these are essential to inform the decisions of the Inspectors. This is the THIRD Local Plan I have had to point this out to, clearly heritage is not a consideration or priority.

Mark Pott

Headington Heritage, A personal blog
Saving Headington's Heritage

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