

Submitted to Oxford Local Plan 2045 Submission Draft (Regulation 19) Consultation  
Submitted on 2026-03-12 21:09:02

## Contact Information

### 1 Name

Name:  
Sally Richards

### 2 Email Address

Email:  
[REDACTED]

### 3 Postal Address

postal address:  
[REDACTED]  
[REDACTED]  
[REDACTED]

### 4 Postcode

postcode:  
[REDACTED]

### 5 Organisation Name (if applicable)

Organisation:

### 6 In what capacity are you responding to this consultation?

Individual/Member of the public

7 If you are commenting on behalf of someone else, please state their name here. If you are representing more than one person or group we suggest making a separate submission for each.

acting as agent?:

## Data Protection Notice and Notification Options

### 8 Are you happy for the first line of your address and postcode to be published with your response(s)?

I do NOT want my address and postcode to be published with my response.

### 9 Do you wish to be notified when:

the Inspector's report is published?

10 If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Please note: while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

I am not sure

11 If you wish to participate in the hearing session(s), please tell us why you consider this to be necessary. Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

reason to attend hearings:

Policy SPE14: Ruskin Field

451 Do you consider that Policy SPE14 is sound?

No

452 If you do NOT consider policy SPE14 to be sound, please select your reasons why from the choices below. Please give precise details for your reasons in the box below - if you wish to support the soundness of the policy please also use this box to set out your comments.

policy is NOT justified, policy is NOT consistent with national policy

spe14 comments:

Policy SPE14 is unsound: it fails the NPPF tests of soundness — not justified (not evidence-based, nor the most appropriate strategy), not effective (not deliverable given heritage, transport and environmental constraints) — and contrary to Policy S1 c, f, g, h, i and j as follows:

Policy S1c: Sustainable travel

Bus stops are more than 400m from the site entrance (further from actual houses), with major connections 1000m away. All additional traffic would pass through Northway & St Andrews Rd; roads that are already overloaded at peak hours (formally documented for St Andrews Rd). County has consistently refused additional A40 access. No explanation is offered of how this would be consistent with sustainable travel — not justified (NPPF para 20d).

Policies S1 f, h, i: New use in location harming neighbouring uses, local historical context, heritage significance and protection of heritage assets

The site assessment acknowledges the field

“is entirely within the Old Headington Conservation Area and as a vestige of the rural landscape, the site makes an important contribution to the character, appearance and significance.”

The 2011 Conservation Area Appraisal states:

“The fragments of green fields within the conservation area contribute to the rural character of the village and provide a green setting ... The importance of these fields to the green setting of the village was recognised by the acquisition of several of them by Oxford Preservation Trust and the retention of others as a public park at Dunstan Road.”

Every previous attempt to develop Ruskin Field has failed. A 1990s Green Belt Inspector found the land “should properly be kept permanently open to preserve the setting of the northern edge of Old Headington.” In 2011–12, a Planning Inspector rejected inclusion in the Barton Area Action Plan:

“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 ... allocation of land at Ruskin Fields would be inappropriate and unjustified, and would therefore be unsound.”

The northern two-thirds (SPE14) was also rejected from the 2036 Local Plan:

“because of the sensitivity of the northern part; development there could have an adverse impact on the Old Headington Conservation Area and the Elsfield View Cone”

and not allocated in the draft 2040 plan. The only change since then is the City Council's option agreement with Ruskin College (access via Foxwell Drive) — a financial, not a heritage, assessment providing no basis for departing from Inspector findings. Despite those findings, the Regulation 19 Stage 2 Assessment simply asserts “No significant heritage concerns” — with no new evidence and no explanation of how previously identified harms would be avoided. This is contrary to NPPF paras 20d and 202, which treat heritage assets as an irreplaceable resource requiring conservation. The policy is not justified. Those harms could not be avoided by any residential development on this site; no modification would make the policy sound.

Policy S1g: Greenfield location harming important green infrastructure network

Ruskin Field is greenfield land in the Oxford Green Infrastructure Network's Supporting Green Spaces, forming a continuous green corridor from Dunstan Park to the Barton Triangle. The Stage 2 Assessment notes:

“There is potentially a wetland element given the springs, seepages, and ponds in the surrounding area ... Potential protected species constraints include roosting bats, foraging and commuting bats, breeding birds, reptiles, amphibians and invertebrates. The site contains Section 41 (Priority/Principal) habitats that fall within the LPA Biodiversity Duty. Deciduous Woodland.”

The Assessment anticipates only “10% public open space on site likely achievable as housing allocation” — insufficient to mitigate the loss of this corridor to the standard required by Policy G1B: not justified. It also notes “recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area,” consistent with spring-fed calcareous fen characteristics on this site. Without independent assessment, development must be presumed contrary to Policy R6.

Policy S1j: Benefits not outweighing adverse impacts (NPPF para 11b(ii))

Adverse impacts must not significantly and demonstrably outweigh the benefits. The harms here, to a designated Conservation Area (contradicting two Inspector findings), to irreplaceable green infrastructure, and transport constraints, are permanent and irreplaceable. Against these, 28 houses make a negligible contribution to Oxford's housing target. The planning benefit is trivial; the harms are not. The balance required by NPPF para 11b(ii) is not met.

453 Do you consider that Policy SPE14 is legally compliant? If you do NOT consider policy SPE14 to be legally compliant, please give precise details for your reasons in the box below - if you wish to support the legal compliance of the policy please also use this box to set out your comments

Not Answered

spe14 legal compliance comments:

454 Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

suggested changes to make SPE14 sound:

The harms arising from SPE14 that outweigh the benefits are fundamental to any development on the site, so no amendments would make it sound. The Local Plan 2045 can be made sound only with removal of SPE14 from the list of sites for which planning permission will be granted for development.