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OXFORD CITY COUNCIL

Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Howard Stanbury

Organisation (if applicable): The Friends of Old Headington

Address: [redacted]

Email: [redacted]

Date: 13 March 2026

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 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 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.

	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
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OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
T: 01865 252847
planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number		Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	○ Yes	☒ No
(b) is sound?	☒ Yes	○ No
	○	○

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	☐
(b) justified?	☐	(d) consistent with national policy?	☐

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Oxford Local Plan 2045: Proposed Submission Regulation 19 stage consultation

Responses on Site Allocation SPE5 John Radcliffe Hospital and SPE13 Ruskin Campus

1. Introduction

The Friends of Old Headington (FOH) is a charity, 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 (first designated in 1971). FOH is an active membership organisation with elected trustees that meet regularly to promote our aims and organise local community events, including an annual general meeting. The purposes of the charity are to preserve the rural amenities and village charm of Old Headington and to seek to prevent the village succumbing to urban pressures. It shall work actively to encourage and foster the preservation of the character of the village.

2. Summary of Representation

2.1 Site Allocation SPE5 John Radcliffe Hospital

The Site Capacity Assessment for SPE5 **should be extended** to include the comment

- A large portion of the southern and eastern side of the site lies within the Old Headington Conservation Area (OHCA)

The Site Photo is incorrect and does not show the JR site.

'D: Access, movement, and layout section' contains minor errors (e.g. for Osler Way read Osler Road; there is no authorised vehicle access at Ivy Lane, but pedestrians and cyclists can do so.

Policy SPE5 notes the location of part of the site in the conservation area, a designated heritage asset. It also suggests a masterplan should be available so that new developments and related issues such as green infrastructure and parking can be

addressed in the context of the whole. We would support an initiative to produce such a plan.

We propose that the section on 'Open space, nature, flood risk' be expanded to include consideration for the conservation area. For example parts of OHCA have been affected by loss of green screening and increased flood risk from the unapproved increase in capacity of Car Park T (25/01126/FUL).

We would also propose under movement and access that **i and j** could introduce a requirement for **a site wide transport plan**, which should include a policy to minimise the impact of traffic on OHCA and to align with county policies to reduce overall traffic numbers.

2.2 Site Allocation SPE13 Ruskin Campus

Many of the concerns expressed about the proposed allocation of Site SPE14 also apply to this site - please refer to our separate submission for detail. The Old Headington Conservation Area needs to be afforded the same protection across UWL/Ruskin land.

The planning application that was approved in 2022 was for the demolition and provision of new student accommodation (22/00962/FUL). This - like the fate of many previous applications for the same site for similar work - will expire in June of this year.

Since 2023, submissions made by the University of West London to the planning inspectors at the Oxford Local Plan 2040 inspection suggested the campus site could be used for non-educational uses ('Enterprise') - see Ruskin Field – Representations to Oxford Local Plan 2040 Proposed Submission Draft (Regulation 19) Consultation from Quod on behalf of UWL. This showed that student accommodation would be a minor component of new building on the site. (Section 10, Option 2 - Potential Uses). In 2024 and subsequently, Ruskin has advertised office accommodation in Smith House (https://www.ruskin.ac.uk/about-us/venue-hire).

For the reasons set out in our comments on SPE14 (for residential development) it is inappropriate to allow expansion of the site into non-college-related activities and accommodation.

Policy SPE13 **should be revised to begin** 'Planning permission will be granted for academic institutional uses (subject to Policy H9) and student accommodation.'

Please note the Site Capacity Assessment for SPE13 is wrong to assert that there are tennis courts on site. Ruskin does not claim this, and courts that are visible on the Site Photo belong to a neighbouring property.

Oxford Local Plan 2045: Proposed Submission Regulation 19 stage consultation

Responses on Site Allocation SPE14 Ruskin Field

These are comments from The Friends of Old Headington, recommending **rejection of the allocation of Site SPE14 Ruskin Field** for development.

1. Introduction

The Friends of Old Headington (FOH) is a charity, 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 (first designated in 1971). FOH is an active membership organisation with elected trustees that meet regularly to promote our aims and organise local community events, including an annual general meeting. The purposes of the charity are to preserve the rural amenities and village charm of Old Headington and to seek to prevent the village succumbing to urban pressures. It shall work actively to encourage and foster the preservation of the character of the village.

2. Summary of Representation

2.1 This representation objects to the allocation of **Site SPE14: Ruskin Field** for development in the Oxford Local Plan 2045.

2.2 The proposed allocation includes land from the Barton Area Action Plan, Oxford Local Plan 2036, and draft Oxford Local Plan 2040 that was previously rejected for allocation in those plans.

2.3 The proposed allocation is **unsound** within the meaning of **paragraph 36 of the National Planning Policy Framework (NPPF)** because it is:

- **Not justified**, as the evidence base fails to demonstrate that development of the site represents the most appropriate strategy.

- **Not effective**, because safe and appropriate access and infrastructure impacts have not been adequately addressed.

- **Inconsistent with national policy**, particularly in relation to heritage protection, green infrastructure, and environmental protection.

2.4 Inclusion of SPE14 in the sites for which planning permission will be granted for development is also unsound because it is contrary to **Policy S1 c, f, g, h, i** and **j** set out in the **Oxford Local Plan 2045 Regulation 19 submission** itself**.**

S1 c) It is not an area with opportunities for sustainable travel links

S1 f) It would be a new use in a location, the Old Headington Conservation Area, where it will harm the amenity of existing neighbouring uses

S1 g) It would be a new development on a greenfield location where it would have a negative impact on an important green infrastructure network

S1 h) It would not take account of local historical context and respond appropriately to the heritage significance of OHCA

S1 i) The National Planning Policy Framework (NPPF, para 20.d) requirement that strategic policies should make sufficient provision for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure and NPPF policy (para 202) for the protection of heritage assets such as OHCA that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance provide clear reasons for refusing development on this site.

2.5 In addition to being contrary to **Policy** S1, inclusion of SPE14 in the sites allocated for development is also unsound because it is contrary to **Policy R6.** The site performs an important role in preserving the setting and significance of the **Old Headington Conservation Area (OHCA)**, maintaining a continuous g**reen Infrastructure corridor**, and potentially protecting sensitive **soil and peat deposits.**

2.6 There are **transport and access concerns** that have not been adequately addressed and the evidence base accompanying the allocation does not demonstrate that potential impacts have been adequately assessed, inconsistent with new development being focused on areas with opportunities for sustainable travel links.

2.7 For these reasons, **Site SPE14: Ruskin Field should be removed from the list of sites allocated for development in the Oxford Local Plan 2045**.

These reasons for the allocation of Site SPE14 failing the tests of soundness set out in **paragraph 36 of the National Planning Policy Framework (NPPF)** are developed in more detail below.

3. The Allocation is Not Justified

The allocation is **not justified** because it is not supported by a robust evidence base and does not represent the most appropriate strategy when considered against reasonable alternatives.

The site performs an important function in preserving the setting and character of the **Old Headington Conservation Area**, maintaining a significant green infrastructure corridor, and potentially protecting sensitive soils and peat deposits.

These constraints were recognised in previous planning decisions and plan examinations, yet the evidence base accompanying the current allocation does not adequately demonstrate why the previous conclusions should now be reversed.

4. Harm to the Old Headington Conservation Area (OHCA)

Ruskin Field lies within the north-western part of the **Old Headington Conservation Area** and is a **designated heritage asset.** The site assessment (Chapter 8, p 89) acknowledges that Ruskin 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 **Old Headington Conservation Area Character Appraisal** identifies the small fields within the conservation area as a defining characteristic of the historic settlement. The Statement of Special Interest (p 2) says,

> '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. The attractive tree-lined bridleway leading from Stoke Place allows views over these fields.'

The Appraisal also notes (p. 22) that:

> 'small fields cut off from the wider countryside by the ring road provide the rural setting of the village.'

Ruskin Field forms part of this network of open fields that provide the landscape setting of the Old Headington Conservation Area. These fields play a key role in maintaining the distinctive character of the conservation area by preserving open views, reinforcing the historic relationship between the village and its surrounding landscape, and contributing significantly to its rural character by providing an important green setting.

The site capacity assessment for Local Plan 2045 on the historic environment, character, and local context states that the 'view from Stoke Place across Ruskin Fields to Elsfield is one of the most sensitive across and out of the CA.'

The importance of maintaining this setting has increased in recent years due to major residential development nearby, including **Barton Park** and the proposed development at **Land North of Bayswater Brook**. Together these two developments will bring over 2,200 dwellings to the area. These developments increase the importance of retaining remaining open land that preserves the historic rural character of the Old Headington Conservation Area and maintains green views into and out of the conservation area.

The Stage 2 Assessment of site SPE14 in the Sustainability Appraisal report (Regulation 19 consultation) notes, under SA Objective 11, that there is 'archaeological potential' for Iron Age activity and Roman pottery production having been recorded from the site.

In view of its recognition of the heritage concerns raised here, the conclusion of the Stage 2 Assessment that there are 'no significant heritage concerns' in development of the site seems inconsistent with the evidence set out in Policy SPE14 itself.

Under **NPPF paragraph 212**, great weight should be given to the conservation of designated heritage assets. **NPPF paragraph 213** further states that any harm to the significance of a heritage asset should require clear and convincing justification. **Policy HD3** in Oxford Local Plan 2045 requires that consideration be given to the conservation of heritage assets and their settings. The open character of Ruskin Field contributes directly to the significance and appreciation of the conservation area and development of the site would therefore result in great harm to the significance and setting of the **Old Headington Conservation Area**. The allocation therefore conflicts with both the **NPPF** and the Oxford Local Plan 2045's own heritage policies.

5. Previous Planning And Examination Findings Confirm The Potential Harm To The Designated Heritage Asset

Development proposals for Ruskin Field have been considered repeatedly over the past ninety years. For example, submissions by the Friends of Old Headington to the Full Council meeting on 19/12/2011 Agenda item 22 stated

> 'In 1933 the first threat to develop the meadows we know now as the Ruskin Fields was averted because your predecessors here in the City Council refused an application submitted by a firm of builders who had recently purchased the house and land.
>
> In the 1940s the next owner safeguarded the fields with covenants restricting building.
>
> These covenants – still in place today – don't necessarily have great significance in planning terms, but they are evidence of a long-standing recognition of the value of keeping the fields as green open spaces.'

(Several restrictive building covenants remain registered at Land Registry title ON269207.)

Historically, proposals for development have consistently been rejected due to the site's importance in preserving the character and setting of Old Headington. In 1998 the fields were brought into the Old Headington Conservation Area, and given a Special Open Space designation.

In the 1990s, during the examination of Oxford's Green Belt boundaries, the Planning Inspector noted that land between the Northern Bypass and Old Headington

> 'should properly be kept permanently open to preserve the setting of the northern edge of Old Headington.'

The inspector concluded that the land contributed to the wider landscape setting of Oxford and performed a **green belt function**.

More recently, proposals to allocate Ruskin Field for development were considered as part of the **Barton Area Action Plan**. The Planning Inspector for that plan concluded (our emphasis in bold):

> 'Furthermore, taking into account all of the written and oral evidence, and my views of the site from several short and long distance vantage points, I entirely agree with the conclusions of the Old Headington Conservation Area Appraisal [CD2.1], the SA and the Council's assessment [CD7.13.1 & CD7.13.1.1], that the Ruskin Fields create an important open setting to the tightly knit historic core of the Conservation Area that is fundamental to its intrinsic character. … 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.'**
>
> *(Para 32 of Report to Oxford City Council by Shelagh Bussey MA, Dip TP, DIP EM, PhD, MRTPI, Inspector appointed by the Secretary of State for Communities and Local Government, 14 November 2012.)*

When the Oxford Local Plan 2036 was prepared, the northern two-thirds of Ruskin Field was again rejected as a development site. The Planning Inspector's report states:

> '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.'

The draft Oxford Local Plan 2040 carried over this assessment and did not include the land as an allocated development site.

Despite Planning Inspectors' assessments, the Stage 2 Assessment for SPE14 in the Regulation 19 Sustainability Appraisal simply states that there are 'no significant heritage concerns'. However, it doesn't explain how the proposed residential development would avoid the harms inspectors have emphasised. Therefore, this policy is unjustified.

The only apparent change since the draft 2040 plan is the City Council's financially beneficial option agreement with Ruskin College for access via Foxwell Drive, worth at least £750,000 (see section 9, below), which is unrelated to heritage concerns.

The evidence base accompanying the Oxford Local Plan 2045 does not clearly explain why these previous conclusions should now be overturned. Indeed, given the wide-ranging nature of the harms development would make to these heritage assets that Planning Inspectors for previous plans have emphasised, it's hard to see how ***any*** residential development on this site could avoid them. Therefore, no modification of this policy would make it sound.

6. Loss of a Key Green Infrastructure Corridor

Ruskin Field is currently undeveloped greenfield land that forms part of the Oxford Green Infrastructure Network whose loss would conflict with the objectives of the **Sustainability Appraisal**, including SA Objective 3, which seeks to minimise development on greenfield land.

Both Ruskin Field and the eastern end of Foxwell Drive are designated as **Supporting Green Space** within this network. They are part of a continuous green corridor extending from **Dunstan Park** in the west to the **Barton Triangle** in the east.

This corridor performs several important functions:

- maintaining green views between surrounding residential areas
- preserving the landscape setting of Old Headington
- enabling ecological connectivity and wildlife movement
- contributing to Oxford's wider green infrastructure network.

Policy G1B states that the loss of or harm to supporting green infrastructure be avoided or mitigated through reprovision to an equivalent or higher standard onsite. The intention or requirement to do this is not stated in SPE14.

On SA Objective 10, the Stage 2 Assessment for SPE14 notes

> 'There is potentially a wetland element given the springs, seepages, and ponds in the surrounding area. This should be established through detailed botanical survey. 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.'

On SA Objective 7, the Stage 2 Assessment for SPE14 anticipates only that '10% public open space on site likely achievable as housing allocation.' This could not conceivably mitigate the loss of this green corridor to the standard required by Policy G1B.

To summarise, the role of Ruskin Field as part of a **continuous ecological and landscape corridor** could not realistically be replicated through mitigation measures or through the creation of alternative open space elsewhere. The allocation is therefore inconsistent with both the objectives of the Green Infrastructure network and the Plan's environmental policies and with the NPPF.

7. Soil Quality and Potential Peat Deposits

Available evidence from neighbouring land indicates that Ruskin Field is likely to share characteristics with the **spring-fed calcareous fen landscape** that extends along the ridge encompassing nearby sites such as Dunstan Park, Larkins Lane Field and the Barton Triangle. Such landscapes frequently contain **historic peat deposits**. Indeed, the site assessment notes the 'recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area.'

If peat deposits are present, development could result in significant carbon loss and environmental harm.

Policy R6 seeks to protect soils and natural resources, including peat soils. There appears to be **no independent assessment confirming whether peat deposits are present** within the site. In the absence of such evidence, the allocation of the site is premature and unsupported by a robust environmental evidence base. It is, therefore, **not justified**.

8. Transport and Access Constraints

Policy S1c addresses travel links. The allocation assumes that development will be accessed via Foxwell Drive. The Stage 2 Assessment for SPE14 says the nearest bus stops are over 400m away, and those with major connections are 1000m away. Local councillors believe this development won't be car-free.

Even a relatively modest residential development on the site of 28 dwellings could generate 170-225 additional vehicle movements per day, according to calculations by ChatGPT using the TRICS database.

This additional traffic would be introduced onto already heavily trafficked local streets, increasing congestion and potential conflict with existing residential traffic, notably in

Foxwell Drive, Saxon Way, Copse Lane, Dunstan Road, and the rest of the OHCA. Adding bus services on Northway residential roads won't reduce traffic.

The proposed site entrance is close to the A40 Northern Bypass access to Foxwell Drive, currently authorised for use only by permitted buses and emergency vehicles. There have been serious accidents at this junction, which raises safety concerns if access is extended to other vehicles or if unauthorised vehicles use this to avoid the long detour to the development that would otherwise be required.

At present, the evidence base accompanying the allocation does not demonstrate that these potential impacts could be adequately addressed, nor justify how development here would focussing on an area with opportunities for sustainable travel links. Without clear evidence demonstrating that safe and suitable access can be achieved, the allocation cannot be considered deliverable and is therefore **not justified**.

9. Effectiveness and Deliverability

The change from Ruskin Field being considered unsuitable for development in previous Oxford Local Plans to being allocated for development in the 2045 plan appears to rely substantially on Oxford City Council's option agreement with Ruskin College for access via Foxwell Drive (with a consideration over £750,000 to the Council (https://mycouncil.oxford.gov.uk/mgIssueHistoryHome.aspx?IId=38699&Opt=0.)

Such an agreement does not alter the fundamental planning constraints affecting the site, and the existence of such a commercial agreement should not influence whether the site is appropriate for allocation within the development plan.

Without clear evidence demonstrating that the site can be developed without unacceptable impacts on heritage assets, green infrastructure, transport, and environmental resources, the allocation **cannot be considered effective**.

10. Proposed Modification

As explained above, it is inconceivable that any modifications to Policy SPE14:Ruskin Field could make that a sound component of the submitted Oxford Local Plan 2045. To make the Plan sound, therefore, **Site SPE14: Ruskin Field should be removed from the list of sites allocated for development** under that plan. The land should instead remain as undeveloped open land contributing to the green infrastructure network and the setting of the Old Headington Conservation Area.

11. Conclusion

Policy S1j via NPPF (para 11.b.ii) addresses the weighing of benefits and adverse impacts. It is inconceivable that the adverse impacts noted above would be outweighed by the benefit of adding 28 houses on Ruskin Field.

For the reasons set out above, the allocation of Site SPE14 is **not justified**, **not effective**, and **inconsistent with national policy**. The allocation therefore fails the **tests of soundness set out in NPPF paragraph 36** and should be removed from the Oxford Local Plan 2045.