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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: Mark Pott

Organisation (if applicable): Headington Heritage - A personal Blog

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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.

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	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
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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 refer to three submissions made on 13/03/2026 by [redacted]

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 – RESPONSE – Part 1

Mark Pott
Headington Heritage
Saving Headington's Heritage
A Personal Blog

https://headingtonheritage.wordpress.com

This response to OLP2045 Plan Part 1 should be read alongside response to the Ruskin Campus and Field response. (Part 2) and Lye Valley, and Lye Valley Hydrogeological Impact Assessment report (Part 3)

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GENERAL COMMENTS

I wish to represent and participate in all Planning Enquiry sessions addressing policies below.

HENA - Incorrect Procedure Adopted

The Plan cannot be ***effective*** or ***justified*** as the responses from the Reg. 18 stage were not made publicly available, and could therefore relied upon, challenged or tested as they were not submitted to public scrutiny in defiance of the Nolan Principles and good practice. It is therefore it is highly probable, in particular, that Site Policies are relying on incorrect, unchallenged data.

HENA Representations

The HENA report lists the representations, but not how the representations were taken into account, which clearly, they have not been as per the guidance:

"A statement setting out:who was invited to make representations on the plan at Regulation 18 consultation stage, how those representations were invited, a summary of the main issues raised, and how the representations were taken into account;"

Source: https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations

Ineffective Language and Objectives Are Not Set

A Plan, and particular the polices, should not be only aspirational but lay out concrete measures by which the stated objectives are to be realised, it is therefore ***ineffective*** where policies are ***fluffy***.

Phrases such as "*should have regard for.., take opportunities taken…be informed by… into consideration, should* etc are not ***effective*** as clear goals are not set, and at most belong in the supporting text, "*should"* should be "*must"* to be effective.

Conversely, The Council seems to impose solutions to issues, enforcing specific solutions on development, therefore this is not ***positively prepared.***

The content of each policy should be concise, and requirements clearly articulated. Much of the content of policies should be in the surrounding supporting text, as frequently, the "policies" consist of idle speculation, and vaguely articulated and formed ideas - these are marked as ***fluffy*** or ***waffle***. Verbose site description is ***waffle*** if not backed up with concrete policies detailing what is and not acceptable given the characteristics.

"*Reduce*" is either meaningless as it is a comparative without a baseline, or not related to the application so *ultra vires*, as the condition must relate to the application.

What does "*The minimum number of dwellings to be delivered is XX"* if that is undeliverable and will then result in important losses of heritage, green space?

Many policies seem to assume that if a report is written the planning result will obtain, without providing any metrics as to what the goals or thresholds are to allow consent.

Repetition in Site and Area Policies of General Policies

Many site-specific policies repeat endlessly concerns that should be, or are, general policies such as car parking, flooding etc, this is ***ineffective*** as it can lead to confusion or lack of consistency and is frequently simply wrong eg:

Policies G1 and G3 require protection of existing green infrastructure features and enhancement of greening on site through the urban greening factor. Policy G5 requires onsite biodiversity enhancement, and Policy G2 requires new Green Infrastructure features and enhancement of existing features. It is expected that those requirements will be met in the following ways. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI. (JR, Churchill, NOC)

Is not only needlessly repeated, but factually wrong – G6 and G7 are the relevant policies.

Legal Authority

Especially in the area of energy and related p

ultra vires?– what act or power does this derive from? Not the Planning Acts.

Sites Not Up-to-Date

A number of sites listed (eg: Marston Paddock) have already been developed but remain in the plan, these are ***ineffective*** as already developed.

Plans Confused With Execution

The requirement to produce a plan (eg Traffic Assessment, SA etc) is confused with the actual goal, which is to achieve specific outcomes. A plan is not a goal, it is a means to a goal therefore these policies are ***ineffective***.

Policy Map Blunders

It is not clear which Policy Map is the authoritative version, all are peppered with errors and omissions and not consistent with each other, rendering the OLP2045 ***ineffective*** and ***unsound***. Green Spaces demarcation, possibly due to the illogical and wrong Green Space Survey 2020, is fundamentally incorrect. See Green Spaces (G1-G9)

In light of above, the Inspector must reject the plan in its entirety until the numerous problems are addressed.

CHAPTER 1 – INTRODUCTION AND STRATEGY

POLICY S3 – INFRASTRUCTURE DELIVERY

The policy is ***ineffective*** as the largest developers and infrastructure developers are the Universities, Oxford University Hospital Trust (Churchill, John Radcliffe, Nuffield, Old Road Campus (part), laboritories etc who pay very little or no CIL contributions due to their charitable status – no effort to alter the CIL tariffs to match the unique mix of Oxford has been undertaken.

A statement of intent is not a policy just a fluffy wishlist.

Policy S3: Modification Requested

Remove requirement unless there is a clear relationship to the proposed development, this should in any case provided by CIL City Wide.

POLICY S4 – VIABILITY

This is ***unjustified*** as the overall goal must be to increase the number of houses, it is extraordinary that to maintain viability, car provision, and consequent loss of space for housing, is increased first and then affordable housing provision, which is nonsensical as car provision consumes, for example, one driveway and a potential downstairs room.

It is clearly better to have 10 homes with two affordable, than 6 houses, 3 affordable, with space wasted for parking and car infrastructure.

This is ***ineffective*** as there is no definition of viability, which would be considerably more than breakeven for a developer to proceed with the development.

CHAPTER 2 – INCLUSIVE CITY

POLICY H1: HOUSING REQUIREMENT

Neither the standard method adopted in a non-standard city such a Oxford, nor the confused and arbitrary method used by Oxford which led to the failure of OLP2042 are fit for purpose.

The policy to build 9267 homes (OLP2042 9612) homes is not ***effective*** or ***justified*** or ***positively prepared*** as:

The HENA used for the calculation is based on a set of mainly generic metrics and calculations ignoring most of the special factors in Oxford failing to:

- Collect evidence from the four top employers – OUHT, (Hospitals), Oxford University, Brookes University, BMW re expansion plans, the main drivers for housing need in Oxford
- Understand the very special demographics (Universities, Hospitals) which substantially influence housing provision due to unusual profile of health professionals, academics and students
- Analyze any of the growth factors in Oxford specifically
- Include impact of house extensions and subdivisions which occur in their 1000s every year, adding bedrooms and increasing capacity
- Separate correlation from causation - leaping to unfounded conclusions
- Provide a detailed analysis or separate section on Oxford, the main target of the report
- Oxford has never recorded development made under permitted development rights so the very substantial contribution made to housing need, i.e. from two bedrooms to three etc has never been recorded.[1] In Headington, over 300+ permitted development checks (/PDC/H42) checks have been recorded since 2017, this does not include development where the development was not checked first.
- Include the contribution of sites with less than 10 houses
- Include evidence of the whole market as below and with the current neighbouring local authorities to form a Oxford demand view, and share the burden with the wider area

[1] Factsheet: Permitted development rights: monitoring of new residential units (clause 13) at: https://assets.publishing.service.gov.uk/media/5a81a075ed915d74e6233476/Planning_Register_policy_factsheet.pdf

Exclusion of Sites Under 10 Houses (HENA)

The Government Planning Practice Guidance suggests 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.

Important excluded sites are listed below are in their relevant sections which are NOT included in the Plan which therefore is ***unsound*** as consultation and assessments of sites with important constraints have not been assessed and the community has not been given a chance to give input.

Council Reorganisation

All three variants of the local reorganisation for Oxfordshire result in Oxford becoming a much larger entity, incorporating, at a minimum under the Greater Oxford proposal, much of the nearby area.

The Oxford housing market extends well beyond the city boundaries to, for example Banbury, Bicester,Reading, Didcot, Abingdon and Kidlington. It is there not ***justified*** to destroy the small remaining pockets of green space

Policy H1: Modification Requested

- A rerun of the HENA Calculating the actual housing need using metrics above
- Inclusion of all Sites with less than 10 houses (Listed in each Area section)
- A report detailing how HENA representations were taken into account (which they were not)

See: Appendix – HENA/HELAA below for a detailed discussion.

POLICY H3: AFFORDABLE HOUSING CONTRIBUTIONS FROM NEW PURPOSE-BUILT STUDENT ACCOMMODATION

At each and Local Plan, Oxford City Council has tried, under pressure, to give existing Universities preferential treatment, each and every time the Inspector throws it out as a policy cannot be dependent on applicant identity.

The policy is ***unjustified*** as the economic gain or loss will be the same for existing or new campuses or institutions, further, provision of student housing of itself removes students from the housing market. ***Ineffective*** as student accommodation can be provided by non-University institutions (Boarding schools, Language schools)

Policy H3: Modification Requested

Remove applicant specific text, make ***effective*** as above, and apply contributions to all developments equitably.

POLICY H4: EMPLOYER-LED HOUSING

Ever increasing expansion of the main employers – Oxford University, OUHT and Brookes, BMW, are the root cause of housing need in the city.

The Headington hospitals in particular (JR, Churchill and NOC) have capacity for 1000s of homes in highly sustainable locations, using their football fields of car parks which would reduce the need to travel and provide homes and save surrounding countryside and the few remaining green spaces in the city.

Either employers provide housing, or pay heavy contributions to build housing based on increased staff numbers. They cannot simply create housing need, traffic problems and dump the consequences onto the taxpayer and ordinary citizen.

Employment status is difficult to determine, as many may be Inside IR35 contractors, working for subcontractors and companies (eg: cleaning, catering, retail), placements, students on work experience and training, may require short term accommodation of specific projects or tasks. Vacancy periods are not covered which may provide short term accommodation for tourists etc.

The policy is too complex, restrictive, and provides no incentives or penalties for non-delivery and therefore ***unjustified*** and ***ineffective***. This is therefore not ***positively prepared***. Better solutions such as allowing market housing or straight sale of land would provide more homes.

Policy H4: Modification Requested

Mandatory contributions to housing related to staff numbers, with discounts where on-site housing is provided, and further discounts where destination parking space is used. Allow market component as incentive to delivery.

Some general housing should be allowed. A contribution to housing stock is valuable however delivered, and should be determined in part by the developer.

Sites should not be listed as this is not ***effective*** as the list given is not the same as the Site Policies, Headington Hall and Ruskin are both absent.

POLICY H5: MIX OF DWELLING SIZES

Policy H5: Modification Requested

Not ***effective*** as it is not clear if a one bedroom apartment would be a "home" or not.

POLICY H7: HOUSES IN MULTIPLE OCCUPATION

This policy is ***ineffective*** as the term HMO is not defined. Given the highly transient nature of Oxford's population, and the greater density of accommodation provided, the statement that new build HMOs are undesirable due to social housing need is *unjustified* and unexplained.

This could be ***ineffective*** as it may have a negative effect on student housing provision, discouraging families from renting bedrooms.

POLICY H8: LOCATION OF NEW STUDENT ACCOMMODATION

Unsound and ***unjustified*** as the policy is dependent on the identity of the applicant, which favours existing institutions who feel they own Oxford, which is why this type of policy has been thrown out repeatedly, it is in effect attempting to limit competition. There are three not two, universities in Oxford as University of West London owns the Ruskin Campus. There is no restriction on students bringing cars to Oxford in this policy, only on site. Secondary schools (boarding/language) are not included neither are any institutions that don't have a campus.

Policy H8: Modification Requested

Removal of identity of applicant clause, this can be expressed as a metric eg: per x students, y accommodation. If this policy applies per new site, eg: 3100 it is ***ineffective*** if the policy requires building new student accommodation off-site, then it competes with the general market land requirement so is ***unjustified***. This policy is very muddled.

POLICY H9: LINKING NEW ACADEMIC FACILITIES WITH THE ADEQUATE PROVISION OF STUDENT ACCOMMODATION

Fully approve of the intent, but ***unjustified*** as it depends on the identity of the applicant and excludes University of West London at Ruskin, and boarding and other institutions such as language colleges.

Unclear if this applies to hospital students, post-graduates and trainees.

Ineffective as Policy H16 seems to be redundant as H10 should be the same criteria.

POLICY H14: BOARDING SCHOOL ACCOMMODATION

unjustified **-** What is the justification for the accommodation being adjacent to the teaching campus, and why would it not be in accordance with the local plan like all the others? The Council should stop trying to micro-manage. Muddled.

CHAPTER 3 – A FAIR AND PROSPEROUS CITY

POLICY E1: EMPLOYMENT STRATEGY

The policy is ***unjustified*** as there is no obligation for extra employment to provide extra housing, only permission to do so. The relentless expansion of the OUHT, the Universities and associated research centres is the primary driver of housing need in the city, but E1 permits expansion with no contribution to housing.

If a business wants to downsize and allocate space for housing, this is specifically prohibited, which is ***unjustified***. Work from Home leads to reduced need for space with different workgroups having office days on different days of the week. This is an economic decision taken by the employer, OCC has no role in this.

POLICY E4: AFFORDABLE WORKSPACE

Waffle. Ineffective, as unclear how a larger company should be expected to support a smaller rival, as policy that only included social enterprises justified, seems to be too much interference in normal market operation.

CHAPTER 4 – GREEN BIODIVERSE CITY

G1-G9 – GENERAL

GENERAL - G1-G9 SUMMARY

For this section, please also refer also to response to "Lye Valley SSSI - Hydrogeological Impact Assessment Report"

The policies G1-G9 are ***ineffective, unjustified*** and ***unsound*** the Policy Map and supporting Green Space Oxford City Council Green Infrastructure Study 2022, and therefore Local Plan has:

- No evidence or methodology as to how each green space type (in the Plan, eg "Core","Supporting") is determined.
- Green Infrastructure is marked incorrectly, both in area, description, and accessibility on Policies Map.
- Accessibility – restricted, semi-restricted, open is not visually marked, which would show much space is in fact wholly unusable.
- Green space in allocated sites is often not marked or protected (John Radcliffe)

- The 2022 Study is fundamentally flawed in methodology and input data.
- The Local Plan has no overall assessment of green space need per "Urban Village", per habitant, or deprivation, therefore allocation is site by site with no strategic overview how much remains in each or how equality objectives will be met.
- No comprehensive strategy for sports provision when most sites are earmarked for development piecemeal.
- No allowance for population growth although four times the predicted rate in 2007 or assessment of local need or green deprivation (Equality)
- Playgrounds are not marked as green space

GREEN SPACE ON OLP2045 POLICY MAP/ALLOCATIONS

Green Infrastructure Surveys 2007/2020

The Green Space Survey of 2007 (Oxford City Green Space Study, Report For Oxford City Council, 2005, updated 2007) was an in depth survey of Oxford's Green Space which:

- Recommended 5.75 h.a. of green space (1.98 h.a. unrestricted, 3.77 h.a. restricted) and per 1000 residents, approximately the status in 2005 (p.5-6)
- Found many "Urban Villages" in Oxford were green space deprived leading to inequality
- Recommended MORE unrestricted green space should be found (p.5-7)
- Recommended the Council should seek to find MORE open space by change of access, or new green space due to an estimated increase in population between 2001-2011 of 2.8%

In contrast, the Green Infrastructure Study (GIS) 2022, part of the evidence base for OLP2045 and informing the Policy Map, is wholly deficient, factually wrong, presenting derived, and incorrect, information without explanation or evidence:

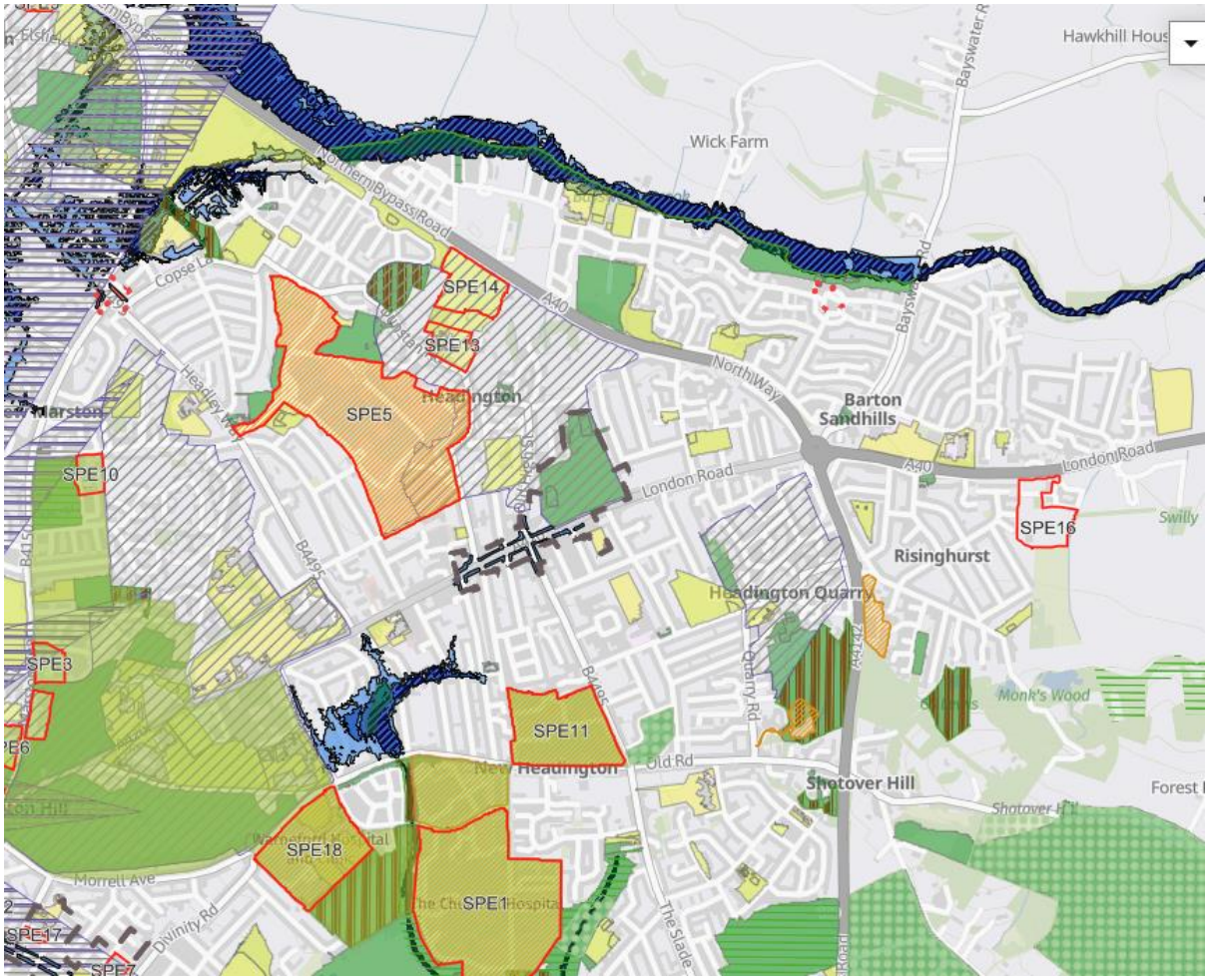
- Relying on cut and paste methodology and text, with a fundamentally flawed methodology and data.
- The unscientific and illogical green space marking can be shown below, comparing policy map of green space with actual provision.
- For example GIS Fig 13, has too many errors to even list and GIS Fig 14 incorrectly lists Oxford's Green Space
- This was pointed out the multiple errors in the survey consultation and ignored.

The incorrect mappings are subsequently duplicated on the OLP2045 Policy Map.

Green Space Mapping Errors - Examples

These examples are from Headington and the Lye Valley area but are similar in other areas:

Policy Map Example - Old Headington And Surrounds



Headington and Surrounds Green Space : Local Plan Policy Map Designation – Incorrect

Mapping omissions include as below:

- Two plots of land owned by the Oxford Preservation Trust, at the Barton Triangle and Larkin's Meadow in St Andrew's Lane, Headington
- John Radcliffe Green, in SPE5 an important green space in one of the most green space deprived suburbs of Oxford
- The rest of the "'Green Belt" of Old Headington as above, including all the OPT land such as Larkin's Lane Reserve and Barton Triangle

Inconsistent inclusions are:

Fields between Dunstan Park and west of SPE14/SPE13 Fields

- Headington House garden, west of The Croft, wholly invisible behind a high wall, and inaccessible.

Further afield, the following are only marked Supporting:

- Barton Road Playing Field
- Headington Quarry Recreation Field

And countless other green spaces.

The map shows the "Green Belt" of Old Headington:

Old Headington – Missing Green Space and the "Green Belt"

Policy Map Example - Lye Valley

The Green Space in the Lye Valley marked as shown in yellow below, but the red area is NOT publicly accessible, and the black area is residential gardens:

OLP2045 Green Space – (Lye Valley Annotated)

Policy Map Example - Town Furze Estate

The outline green spaces are NOT marked, and therefore not protected on the Policies Map:

OLP2045 Green Space – Playgrounds - Peat Moors Estate and Wood Farm (Annotated) [1]

[1] This remains the same on the OLP2045 map as below:

OLP2045 Green Space – Playgrounds – Not Marked as Green Space (Play Spaces above)

G1-G9 General - Playgrounds

The G1-G9 policies are ***unsound*** as no protection is conferred on playgrounds which are generally unmarked and unprotected unless part of a larger green space.

Population Increase

The population actually increased by almost four times the estimate of 2.8% in 2007 (GI Survey 2007) by 10.5%.

The Council proceeded to build on almost all remaining accessible green space in the City, mostly in Council estates, leading to population growth and reduction in green space, creating inequalities, prior to 2001

The poorer suburbs are the most green space deprived, the greatest population increases and most building.

See: Appendix – Population and Green Space Per Resident.

Inclusion of Large Developments on Oxford's Boundary Required

The above, and housing proposals near Oxford must be clearly marked to assist in determining the suitability of land allocations and determining the value of green space, for example:

All development north of Bayswater Brook and Sandhills Field Are Out of Oxford OCC

Policy G1-G9: General Modifications Requested

The Green Space survey 2020, and therefore the policies must be rejected as fundamentally flawed.

The Green Space Survey of 2007 (Oxford City Green Space Study, Report For Oxford City Council, 2005, updated 2007) needs to be rerun to identify the per capita deprivation of green space in each suburb or "Urban Village" of Oxford.

The OLP Policies Map and Local Plan must be updated to:

- Correct incorrect and sloppy boundary markings.
- Add missing green areas with correct designations as above.
- Visually mark restricted, semi-restricted and fully accessible green spaces
- Add Development outside OCC's boundary.
- Add playgrounds with a policy to resist removal

With close community consultation and review, a review of per community green space remaining and a strategic view taken of loss for each, with resolution of specific examples above.

Accessibility of green space must be correctly marked to avoid developer challenge and marked clearly on the Policies Map with red (inaccessible, brown (some accessibility), green (public access) as per the Green Space Survey of 2005/2007.

Playgrounds must be included with a reprovision clause – this is currently only for specific site policies.

POLICY G1 – PROTECTION OF THE GREEN INFRASTRUCTURE

Reprovisioning

The policy is ***unsound and ineffective***, as it is mathematically impossible for a development which reduces green space, to "reprovision" elsewhere, which is also green space, further the term is not explained in the glossary.

Green space in allocated sites is not even marked as such, it does not even officially exist.

Mich of the Green Infrastructure section is ***ineffective*** as it is aspirational waffle, "should" etc – providing a report detailing harm does not stop it etc.

G1 - Green Space Policy v. Residential Gardens

The conflict between Residential gardens in designated green space protections in Policy G1 must be resolved in favour of Green Space protection, or Core Green space could be lost where land is in both as in the Lye Valley example above.

G1 - It is unclear whether designated green space designation prevails over Policy G1

Modification Requested

The policy is not ***effective*** until:

- Clarification that green space designation is more important than either residential garden policies, or Local Plan allocation either as Area or as Site
- Inclusion and marking of ALL green space both in and out of allocated sites with commensurate protections
- As per general modifications (G1-G9) above
- Must include NPPF statements re protection of SSSIs and other nature areas, the statement on residential gardens is particularly concerning

POLICY G3: PROVISION OF NEW GREEN AND BLUE

Urban Greening Factor

The policy is ***ineffective*** is "technically infeasible" is not defined or enforceable.

POLICY G4 – NET GAIN IN BIODIVERSITY

Policy G4 – Modification Required

Must include provision for where the habitat is NOT swappable, it is not permitted to be ***justified.***

It is ***ineffective*** as it does not address destruction of unique habitat off-site such as the Lye Valley.

The policy

POLICY G5 – DELIVERING ONSITE ECOLOGICAL ENHANCEMENTS

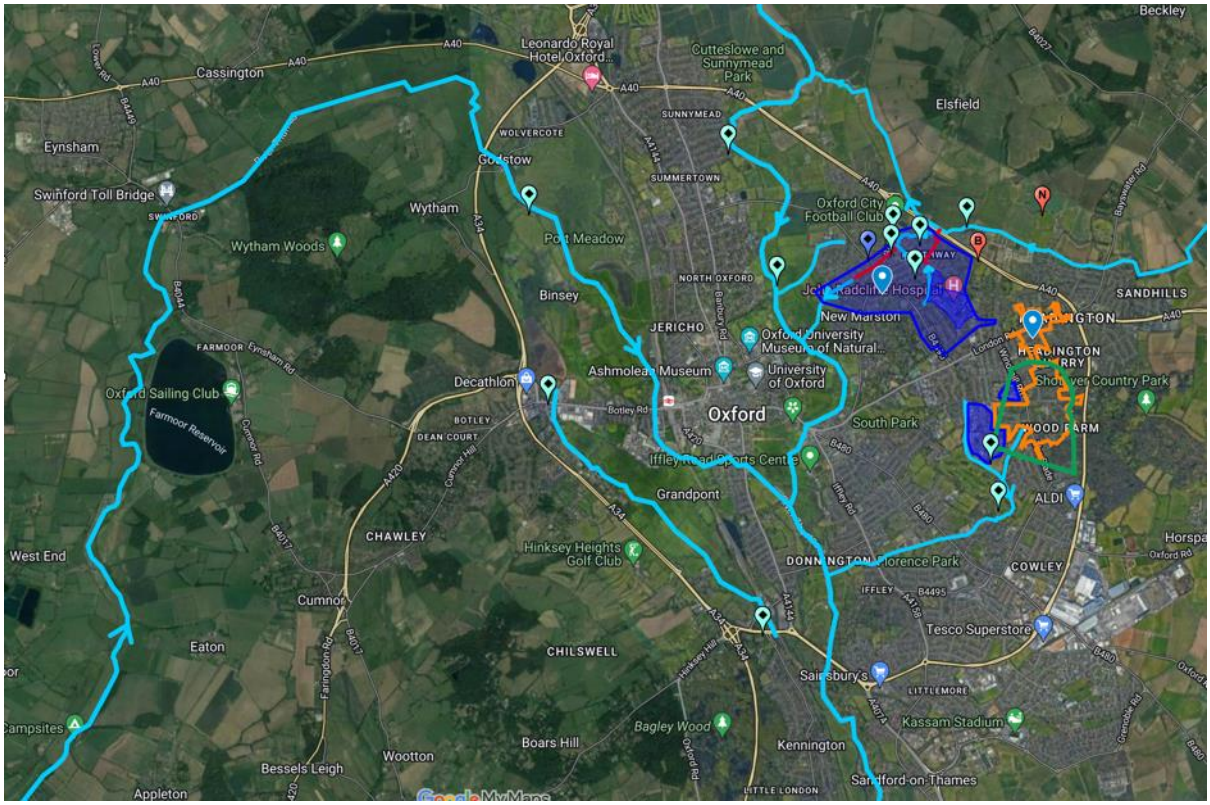
It is ***ineffective*** as the wording is ***fluffy*** "strongly encouraged" means nothing and the outcome is not measurable.

POLICIES G6/G7/G8 - PROTECTING OXFORD'S BIODIVERSITY & FLOOD RISK/SUDS

The policies are ***ineffective*** with excessive concentration on the Oxford Meadows SAC. The Lye Valley SSSI comprising of a very rare alkaline fen is scarcely mentioned.

There is no explanation, acknowledgement, or policy regarding runoff from transport infrastructure or the danger of flooding in FZ2,3s from FZ1 development such as from Headington, which has caused repeated flooding in Northway/Marston, the Lye Valley and Cowley Marsh and Barton Park.

Increasing and intensive urbanisation is a far greater cause of floods than climate change, much by the cumulative impacts of household extensions, driveways etc which do not require planning permission.



Rivers and Catchments Around Oxford – Lye Valley groundwater (green_, Orange Thames Water (Orange)

Oxford has repeatedly flooded since early times. (Search: *Oxford's Floods – A Warning, Headington Heritage)* exacerbated by climate change and increased urbanisation, and foolish floodplain developments such as Barton Park. Flooding at Campbell Road, Cowley (From JR Hospital see below)

Sewage discharge occurs both through Oxford and the Thames Water Sewage Treatment plants (SWT) often due to surface water flooding eg:

- Upstream discharge most notably from the Witney SWT which discharged for the entire winter last year, improvements ongoing.
- Oxford Sewage Treatment Works, discharged on many days last year.

The Local Plan lacks an overall strategy to manage overall flood risk, which incorporates both flooding of houses, but also sewerage discharge.

G7 is ***ineffective*** as flooding in Flood Zones 2+3 is caused by runoff from Zone 1 runoff, therefore ALL applications must demonstrate greenfield runoff rates. Modern buildings drain a higher proportion of water into surface drains than older buildings where roof runoff fell on the ground or Victorian soakaways. Critical Drainage Areas only exist in Devon and Cornwall, therefore this ***ineffective***.

Lye Valley and calcareous/Peat Areas

The Lye Valley is a very small area of Ice-Age relic fen, dependant on calcareous springs/flows percolating from rainwater falling on permeable natural surfaces, flowing over thin strata, and emerging at the top of the valley sides.

The Lye Valley and other calcareous locations, such as Headington Hill Park, Ruskin College (SPE13/14), Dunstan Park and other adjacent areas are at risk from increasing development leading to reduced groundwater, and increased scouring from surfacewater via urban drainage.

G6 is ***ineffective*** as the mappings marked on the Policy Map in folder "Lye Valley Hydrological Study (G6) derived from the defective Hydrogeological Impact Assessment Report are incorrect.

Policy G6/G7/G8 Modifications Requested

The following modifications are required to make the policies ***effective*:**

- Replacement of "*mitigation*" with zero or greenfield run off in ALL zones.
- Replace the ***ineffective*** "*demonstrate that they have considered information from various sources"* with *addressed*
- A proportional FRA for ALL zones including offsite cumulative risk
- ALL development to produce net-zero runoff with improvement required to stop downstream flooding
- A Grampian condition for all development in Oxford to ensure Thames Water can manage surface runoff, currently Thames Water does not have the capacity to manage new development
- A ban on development on low-lying FZ3 land, flood defences do NOT protect against groundwater flooding to stop foolish development such as Barton Park
- Large commercial basements are unacceptable any location in Oxford as they displace groundwater which floods downstream, such as at the Churchill and Old Road Campus which increase flooding in Cowley Marsh
- Should read "blocking *or displacing* groundwater"

For the Lye Valley and areas above the following modifications are required to make the policies ***effective*** :

- Article 4 Directions to remove permitted development rights in both groundwater and surfacewater catchment areas of the Lye Valley, all of OCC, to reduce cumulative impacts of redirection of water to urban drainage, by the 100s of small householder extensions etc for ALL development, greenfield runoff rates required by infiltration
- Formal identification calcareous emergence areas such as Headington Hill and Dunstan Park, Ruskin College and others
- NO further development in groundwater catchment, SUDS are NOT acceptable as they will fail and require maintenance, as per the Lamberth report
- Update to all Site Policies that impact the Lye
- CHK Remove "*Any planning applications near the Boundary Brook or Lye Valley/SSSI/LNR/LWS etc) will also need to assess the potential for additional indirect impacts on the flora and fauna of those area..*" from Churchill (SPE6) policy and apply as a general statement to ALL development sites.
- Update the Hydrogeological Impact Assessment Report, completed as part of LP2042, which remains unchanged with none of the defects raised during the consultation, addressed.
- "*Surface water runoff should be managed*" is ***fluffy***, not defining the actual target, which should be greenfield, *should* is vague throughout*, must* required.
- "Where feasible" and "where required" are not defined.
- G8 SUDS - the policy is ***ineffective*** as it does not address chemical composition, a key factor in the flows into the Lye Valley SSSI and the other calcareous fen areas in the city.

IMPORTANT: Please refer to Appendix - Lye Valley. And response to Lye Valley SSSI - Hydrogeological Impact Assessment Report

CHAPTER 5 – CITY THAT UTILISES RESOURCES WITH CARE

Generally, is this section *ultra vires*? A bit of a ***wafflefest***, just some really ***fluffy*** ideas from the last groupthink.

R4 – AIR QUALITY (INCLUDING CLIMATE CHANGE AND CARBON)

There is no acknowledgement anywhere of Oxford's responsibility to tackle climate change by reducing the factors that lead to congestion and emissions. Oxford can via planning reduce destination parking especially at the Headington Hospitals.

Policy R4- Headington Hospitals Parking Provision (and Others)

The policy and goals are ***ineffective*** without urgent reduction of Headington Hospital (John Radcliffe, Churchill and NOC) car parking provision, see Appendix – Air Quality and Headington Hospitals.

As can be seen below the three Headington Hospitals, football fields of staff car parking (70%) is mostly responsible for air quality, health and environmental issues caused by vehicles in Oxford as a whole, as the centre of transport and employment is now Headington, causing miles of traffic jams every day and gridlocking Headington and Oxford in general.

In summary:

- Total parking provision of 4646 spaces is double the entire city centre provision.
- 70% is allocated for staff parking.
- Peak shift times correspond to peak traffic in Headington where tailbacks to two miles from the Headington Roundabout.
- Car permits are less that £100 PA for most staff incentivising car usage.

Hospital	Staff	Informal	Staff+Inf	Visitor	Total
JR	1581	250	1831	769	2600
Churchill	892	183	1075	431	1506
NOC	345	20	365	175	540
Totals	**2818**	**453**	**3271**	**1375**	**4646**
Percent	60.7%	9.8%	**70.4%**	29.6%	**100.0%**

**Most informal spaces will be used by staff as a visitor would not risk parking *"informally"*, therefore these are grouped together as staff+informal.

The relatively few parking spaces in contrast in the City Centre are shown below: (2270)

Car Park/Location	Car Spaces
Oxpens	179
Broadstreet	30 (Estimated)
Gloucester Green	105
Oxford Train	556
St Giles	200 (Estimated+other on street allowance)
Westgate	1000
Worcester	200
Total	**2270**

Put simply, the hospitals' parking provision is over DOUBLE the entire public parking provision in the City. (4646/2270), the rest of Headington has only a 120 space car park in Old High Street, and St Leonard's (47), and Old Road Campus (417+) and a few relatively minor car parks (eg: Headington School)

The OUHT has represented repeatedly at local plan inspections to retain or increase car parking at its sites, most recently in the Local Plan 2036 hearing where it successfully argued for the removal of the site policy clause "reduce parking" on all its sites.

OUHT has previously argued that reducing car parking will increase queuing on the main roads, this is nonsense, the provision of public transport and removal of destination car parking is the only means to achieve this, it is deeply disappointing OCC parrots this nonsense.

Any new development which increases staff numbers must REDUCE total parking on site, as at least some staff will use JustPark, Park-on-my-driveway, or dropoff or simply park in any of the 100s of 2 hour on-street parks which are never monitored in Headington. It is therefore NOT correct to argue that reduce parking is unreasonable as it does not relate directly to the development, it does.

All the Headington Hospital site policies simply mention a need to consolidate parking (ie multistorey) rather than remove it.

The full article and history of this is available by googling with search terms:

Headington Heritage *Headington's Hospitals – Killing and Curing Us?*

R4 - Modification Requested

- Inclusion of environmental, social and health benefits of reducing traffic, not just air quality of "*efficient use of land*"

- Mandatory reduction of parking on site at as a quid pro quo for any future expansion directly related to staff numbers (over all shifts) – reward house building, penalise continued car parking via CIL
- Update to policy to recognise negative contribution to global warming
- No net increase in parking permitted
- "Mitigation" to be replaced by "reduce" or net-zero

The Workplace Levy has been talked about for over ten years and will not happen, or most hospital parking will be declared "operational", this in in any case not a material consideration. Traffic Filters are not on any of the routes to the hospitals.

Specific site polices are commented on in the relevant sections which refer back here to avoid repetition

POLICY R5: WATER RESOURCES AND QUALITY

Ineffective as Building Control, not Planning inspect this. A lot of this is in the Building Regulations, so pointless to repeat it here, at least as a policy.

POLICY R6: SOIL QUALITY

Major developments on undeveloped land upon, or within 200m of, *known peat reserves* ..

The Lye Valley catchment is at very high risk of erosion and dewatering due to erosion from storm water drains or dewatering from water being redirected away from becoming groundwater and being lost to urban drainage, this extends of the entire catchment. This is the same issue for other identified areas of peat.

The policy is ***ineffective*** as it states within 200m not "*where peat reserves on site or downstream can reasonably be suspected*"

R6 - Modification Requested

Identification of Lye Valley, Dunstan Park, Headington Hill north slope (along A40) (Ruskin, Larkin's Lane Field), and other peat reserves 200m is entirely arbitrary.

Once a report is written, what are the metrics to permit or not permit the development?

CHAPTER 6 – HERITAGE AND DESIGN

All policies in this section are confusing method with targets, are ***ineffective*** and ***fluffy***, confusing writing a report with actual protection or mandatory rules. and where not just regurgitating the NPPF.

POLICY HD1: - PRINCIPLES OF HIGH QUALITY DESIGN

Is ***ineffective***, as the vast majority of applications, namely, householder, are excluded from the necessity to provide even a basic rationale for the proposal.

Policy HD1: Modification Requested

Remove Householder application exception, this is covered by the proportionality clause.

POLICY HD2: MAKING EFFICIENT USE OF LAND

Car infrastructure, roads, driveways and garages are the single biggest cause of inefficient use of land, occupying space that could be a bedroom or extension, yet there is no policy recognising this is poor use of space.

It is ***ineffective*** as is nonsensical, it is not possible to enhance green infrastructure by destroying it.

"*Informed by understanding*" is *ineffective* and meaningless, developments in heritage areas or places valued by the community, must be blocked if they cause significant harm, similarly, such developments must be of scale and form appropriate to their context.

HD2 – Requested Modification

The built form…does not use land for car parking.

POLICY HD3 - DESIGNATED CONSERVATION ASSETS

Substantial harm to or loss of significance of a designated heritage asset should be exceptional in the case of Grade II assets and wholly exceptional in all other cases, and planning permission or listed building consent will only be granted if the requirements of paragraph 214 (or the equivalent in any update) of the NPPF can be demonstrated as set out in a heritage statement.

This statement is *ineffective* as it states that the developer's heritage statement is the only input used for determination, not input by the public or any other body, essentially, a developer only has to show it has been through the motions "*informed, assessed, responds, explored etc"* and that will be sufficient.

Conservation Areas, as Designated Heritage Assets, are not ***up-to-date*** and ***ineffective*** as many have large sections destroyed, so should be drawn to new boundaries, removing areas that no longer have anything to preserve such as Headington Hill "Conservation Area" which includes the Clive Booth Housing area, Oxford Brookes Campus and modern housing estates, and much of Oxford City Centre Conservation Area which now, thanks to failure of OCC to control development, has all the charm and atmosphere of Swindon, this is supported by NPPF Para 191:

When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

..can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment.

Almost all development in Conservation Areas will confer substantial benefit, by for example, providing more housing which will always be claimed to be a "***substantial public benefit***" so Policy HD3 becomes ***ineffective*** – there is no recognition that similar benefits may be realised elsewhere for less social, cultural and heritage loss.

It is contrary to NPPF Para 201 which states several tests to be met which are omitted in the policy.

It is ***unjustified and ineffective*** to mark Conservation Areas with boundaries which include parts with nothing left to preserve, these must now be shrunk to remove parts which the Council has allowed to be destroyed, it cannot, and must not claim, to be protecting areas that are now wholly lost.

Policy HD3: Modification Requested

- Shrink Conservation Areas to parts where something remains to conserve.
- Remove "*substantial public benefits*" clause, revert to NPPF para. 201 etc.
- Update ***fluffy, ineffective*** wording such as *responds, considered, informed* to specifics such as *must not etc.*
- Conservation Area Appraisals have still not been added to the evidence base

POLICY HD4 – NON-DESIGNATED HERITAGE ASSETS

Ineffective, as the goal seems to write a report rather than define the degree of harm that would acceptable – so "*due regard, informed by, recording*" give NO protection at all to these, this is not ***justified***.

POLICY HD5 – ARCHAEOLOGY

Reads as if central Oxford is the only place of any importance. Headington is far older as a settlement and manor for example.

POLICY HD6: - VIEWS AND HEIGHTS

Policy HD6: Modification Requested

Ineffective as it appears to only refer to central Oxford and the dreaming spires, not views for example into, and out of the Old Headington Conservation area, the language needs to be clearer that it applies to ALL of Oxford where views exist either in or out, regardless if listed as view cones or not. See also Ruskin Field SPE13.

POLICY HD7: - HEALTH IMPACT ASSESSMENT

Policy HD7: Modification Requested

Ineffective, requiring an assessment does not set a target for compliance, not clear how this is implemented for health impacts from increased traffic, loss of green space etc.

CHAPTER 7 – A LIVEABLE CITY

POLICY C1: TOWN CENTRE USES

Policy C1: Modification Requested

Headington District Centre designation includes Bury Knowle Park, this ***ineffective*** and ***unjustified*** therefore ***unsound*** as most of the uses are clearly inappropriate for Core Green Space, the primacy of green policies over this policy must be clearly stated, as it stands, a large building could be built in the centre of the park and conform with this policy.

Policy C1: Modification Requested

- Remove Bury Knowle Park from Headington District Centre
- Extend centre to include backstreet behind Windmill Road where Oxford Dance School and a café are located
- Have clear statement that green policies to protect the park and others take primacy.

POLICY C4: PROTECTION, … AND NON-RESIDENTIAL INSTITUTIONS

OCC has, at every single local plan, attempted to block any rivals to Oxford University or other institutions trading on the Oxford moniker.

This exception is *unjustified* as essentially the Universities can do whatever they want, without giving access or use to the citizens of Oxford.

Policy C4: Modification Requested

Remove the **unjustified** phrase "*the proposal will meet local needs or an existing deficiency in provision or access*" a backdoor method of banning new institutions, and the exception that the Universities do not have to provide benefit to Oxford.

Waffle - much of requirements are addressed in other policies such as traffic and environmental impacts.

POLICY C6: TRANSPORT ASSESSMENTS, TRAVEL PLANS AND SERVICE AND DELIVERY PLANS

A typical bureaucratic view of the world, plan=delivered.

Policy C6: Modification Requested

b) "…**residual ..** impact" means what?

c) "*and within neighbouring areas; "* is ***ineffective*** as it is outside of the developer's control.

Ineffective, as none of above actually reduces anything and implies an increase in traffic is acceptable which it is not as roads are already 100% bandwidth utilised.

Ineffective as it muddles planning with delivery of the objectives, the policy must state this must be done, not planned for.

Ineffective as it states "***is likely to***" which is meaningless, and only applies to the City Centre AQMA not the whole city.

Ineffective as no metrics given.

POLICY C8: MOTOR VEHICLE PARKING DESIGN STANDARDS

Policy C8: Modification Requested

Ineffective as "***scheme***" is not defined, in particular for smaller developments such as end of garden development/site split or 2-3 houses, and frequency is not defined by time eg: rush-hour versus 04:00 AM.

will only be granted for residential schemes that are low car:* unclear language, means *only?*

"Seek a reduction" is ***ineffective***.

Essentially this policy permits and increase in traffic if the developer can prove it is necessary via its transport assessment.

As extra staff or residents will be multimodal, at least some will increase traffic, therefore a net reduction is required to compensate.

CHAPTER 8 – DEVELOPMENT SITES, AREAS OF FOCUS AND INFRASTRUCTURE

CHAPTER 8 - NORTH INFRASTRUCTURE AREA

POLICY SPN4: OXFORD UNIVERSITY PRESS SPORTS GROUND

049 – Modification Required

Non allocation due to lack of green space and proximity to river.

CHAPTER 8 - SOUTH INFRASTRUCTURE AREA

POLICY SPS2: ARC OXFORD

No building on green infrastructure as marked on map, contributions to make it useable by the community from Cowley in particular.

See: Response to G1-G9 Green Spaces.

POLICY SPS3: BERTIE PLACE

Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford.

Heritage and amenity must be preserved.

See: Response to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7.)

POLICY SPS7: KASSAM STADIUM AND OZONE LEISURE PARK/SPS3

Littlemore Priory was approximately at the location of Minchery Farm (Nuns') policy must be updated to address this. Roman kilns have been found nearby:

Kiln [533] 2nd century Kiln [518] 3rd century Kiln [573] 4th century

Source_ RPS 1996 OHER 16787 Kiln site

Sewage overflow concerns due to proximity with Oxford SWT (See Mini Plant Oxford)

POLICY SPS8: LAND AT MEADOW LANE

Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford.

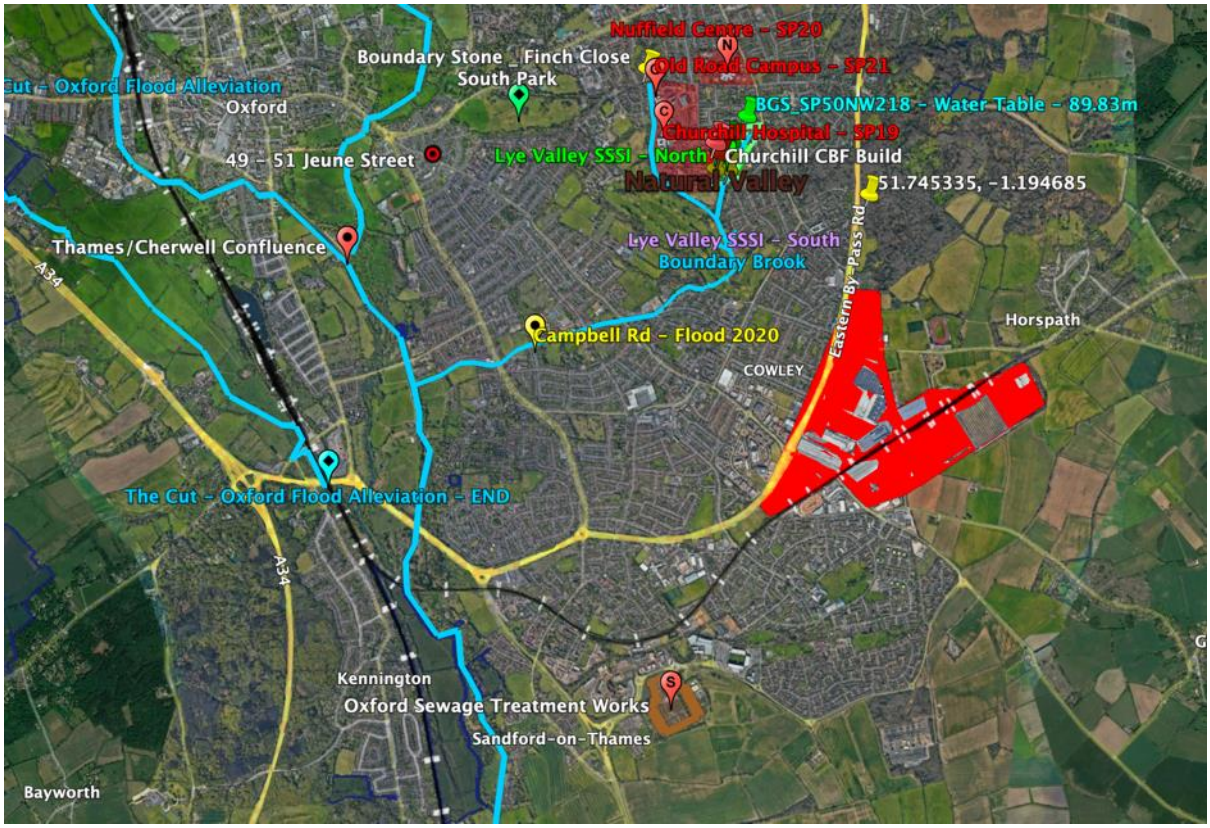
Heritage and amenity must be preserved.

See: Response to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7.)

POLICY SPS10: MINI PLANT OXFORD AND SPE17: UNIPART (BUSINESS PARK)

A total ***wafflefest*** good identification of issues, but no targets set.

A more robust policy is required to reduce surfacewater runoff from the very large number of hard surfaces (Red), particularly as the complex is close to the Oxford Sewage Treatment Works (Thames Water)



BMW/Mini Plant and Industrial Zone (Red) – Neat Oxford Sewage Treatment Works

SPS10– Modification Required

Reduction in surface runoff with SUDS etc.

SPS12– OXFORD SCIENCE PARK

Residential component must be mandatory or it is ***unjustified*** to increase employment without adequate contribution to housing.

Minchery Farm is the location of the infamous medieval Littlemore Nunnery and has very high potential for archaeological remains.

This site is adjacent to Oxford Sewage Water Treatment Plant.

POLICY SPS13: OZONE LEISURE PARK AND MINCHERY FARM

Minchery Farm is the location of the infamous medieval Littlemore Nunnery and has very high potential for archaeological remains.

POLICY SPS14: REDBRIDGE PADDOCK

Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford.

Heritage and amenity must be preserved, the paddock is a very visually attractive gateway to the city.

See: Response to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7.

SPS14 – Modification Required

Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford.

See: Response to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7.

POLICY SPS15: SANDY LANE RECREATION GROUND

Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford, land required for increasing population and any replacement sport facilities from Cowley/Littlemore.

See: Response to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7 and Lye appendix.

POLICY 104: FORMER IFFLEY MEAD PLAYING FIELD

Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford, proximity to SSSI.

Heritage and amenity must be preserved.

See: Response to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7.

POLICY 17: CRESCENT HALL

Substantial Roman pottery activity has been identified in the general area.

POLICY SPS17: EDGE OF PLAYING FIELDS, OXFORD ACADEMY

GONE IN OLP2045?

Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford.

See: Response to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7 and Lye Valley Appendix (Flood risk)

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CHAPTER 8 - EAST INFRASTRUCTURE AREA

POLICY MRORAOF: MARSTON ROAD AND OLD ROAD AREA OF FOCUS

The policy incorporates green spaces such as Headington Hill Park, South Park and affects the Lye Valley.

These are core green spaces, so their inclusion is ***unjustified*** and ***ineffective*** as it leads to confusion as to which policy prevails, as MROFAOF states "*Planning permission will be granted for new development within this Area of Focus"*

Seeking "*opportunities*" to "*consolidate and reduce*" car parking is meaningless without clear objectives set is ***ineffective***

The policy is nonsensical linking different sites and areas that have nothing to do with each other with different constraints, seems to be jumble of generic policies deliver and ***Waffle*** that can't be delivered.

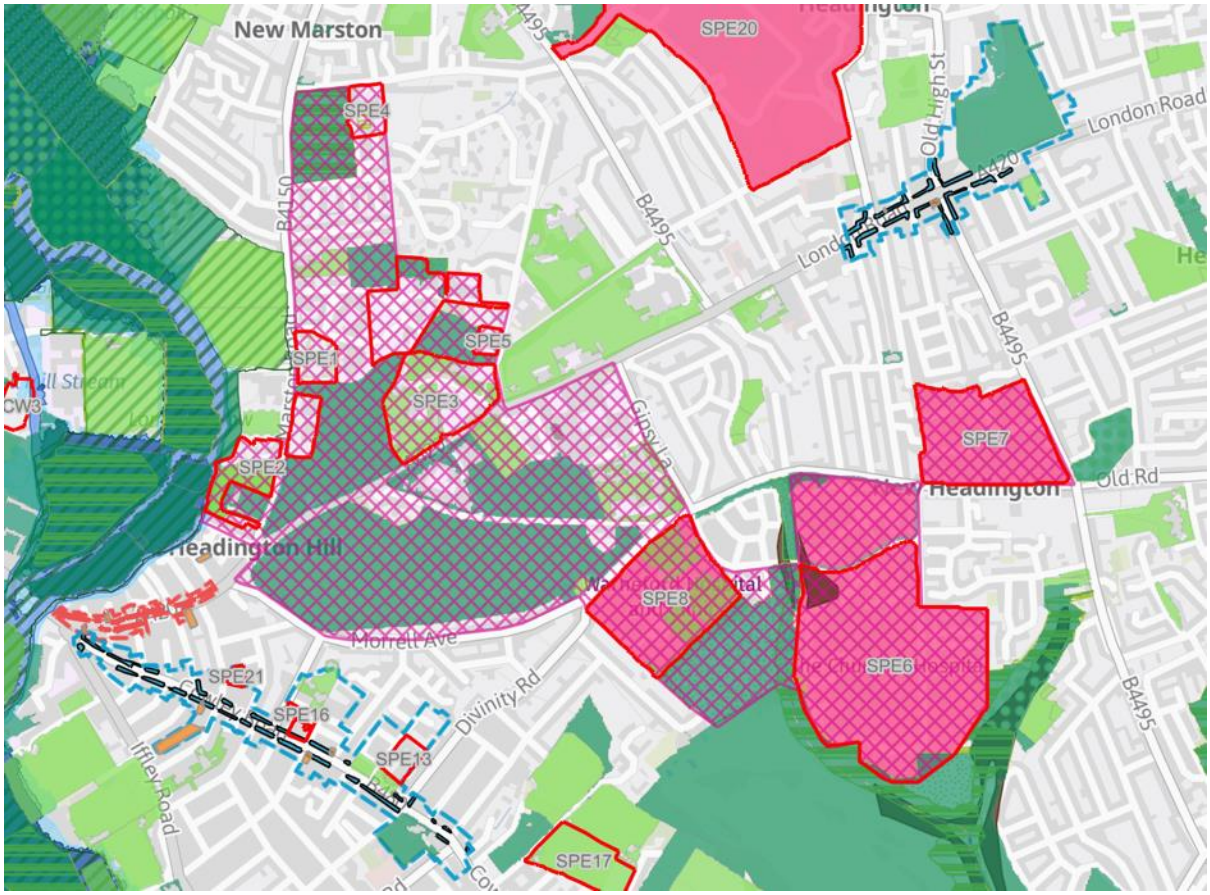
It is extremely difficult to understand the logic of incorporating public green space unless to allow building on green spaces or to privatise it.

The following Individual Site Allocation policies have disappeared:

- Oxford Brookes
- Old Road Campus
- Clive Booth Hall

Which addressed specific site constraints. This is *unjustified* and *unsound* as each site has its own constraints – Old Road Campus has recently had a nearly 500 space underground car park approved although immediately above Cowley Marsh and the Lye Valley South Fen.

Most of the specifics belong in the now absent Site Policies where developers will refer for guidance.



MRORAOF – Hatched Areas including South Park, Headington Hill Park and other.

Policy Area of Focus Above - Modification Requested

- Removal of policy as it is nonsensical, ***fluffy***, and removes clarity of public green space status and site allocation policies exist (except Old Road)
- Reinsertion of Site Policies as above

Cuckoo Lane runs from Old High Street to Marston Road and is a local heritage asset, this should be incorporated into the relevant site policies (eg: John Radcliffe), Pullen's Lane, Headington Schools, Gov and Harcourt, Oxford Brookes) or be a separate policy, it extends well beyond the MRORAOF area so is ***ineffective*** and ***unsound***, ***muddled***.

SPE1: CHURCHILL HOSPITAL

Parking Issues

The hospital has a total of 1506 parking spaces compared to a total of 2270 across whole of city centre. 4646 car parking spaces exist across the three hospitals with 70% allocated to staff.

The football fields of massive 1970s parking which is blighting Headington and beyond must be addressed to make this policy *effective.*

Policy SPE1: Modification Requested

See: responses to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G6+G7 and Lye appendix and:

- Many statements regarding the Lye should NOT be included in the Site policy, but applied generally as discussed in section Policy G6+G7 response above with a reference only to them from SPE1

- Reduce parking in exchange for further development as discussed (Response R6 – Air Quality)
- The statement *Development proposals should demonstrate rationalisation of the existing parking on the site* must be replaced by "*reduce car parking with no increase permitted*."
- *"A buffer zone should be provided during the construction period to avoid disturbance to the adjacent SSSI."* Add "*in operational phase*"

POLICY SPE2: EAST OXFORD BOWLS CLUB

Cowley has the least green space provision per capita in the city. Removal of yet more green space is *unjustified.*

SPE3: GOVERNMENT BUILDINGS AND HARCOURT HOUSE

A natural calcareous stream flows into Harcourt House from Headington Hill Park with water across the path after rain.

SPE3: Modification Requested

Ineffective as does not include specific amount of public space.

Unjustified, as no mention of the need to preserve the seclusion of Headington Hill Park is mentioned, a risk from multiple sides of the development sites which can impact on the seclusion of the park.

Peat and fen survey required at site, see Section Peat and Tufa above.

Cuckoo Lane end of northern part is on the old Oxford City boundary, one stone survives, there may be 1-2 on this site buried, a watching brief is required.

POLICY SPE4 AND SPE7: JESUS AND LINCOLN COLLEGE SPORTS GROUNDS

Unjustified

Cowley is the most green space deprived suburb in Oxford having only 1.14HA per 1000 residents in 2006 of a city average, then, of 5.75HA, and with a now 11.2% population increase. (See G1-G9 and Appendix – Population and Green Space Per Resident)

This is the last large sports facility following the loss of other green space in the area. There is no suitable alternative available.

Retaining some of the sports provision is NOT sufficient as it will not be adequate to service the needs of all at peak times, which invariably will mean residents can only use them at unpopular times.

Most alternative sites to relocate sports facilities are already earmarked for development.

Policy SPE4 - Modification Requested

Refusal of site policy, no alternative green space exists with a growing population.

POLICY SPE5 - JOHN RADCLIFFE HOSPITAL

Almost all of this policy is a ***wafflefest*** with no goals or objectives, missing almost all the main issues such as parking and flooding, most the ***fluffy*** ideas are unenforceable without a planning application which directly relates to them, so belong in the supporting text at best.

Parking

See: Churchill Site above, responses to Policy H5 (Housing), R4 - Air Quality(Parking) (Headington Hospitals), Policy G1-G9, G6+G7 and Lye appendix.

The hospital has a total of 2600 parking spaces compared to a total of 2270 across whole of city centre. 4646 car parking spaces exist across the three hospitals with 70% allocated to staff.

The football fields of parking lead to:

- Environmental and health issues due to traffic generated (See R4 - Air Quality)
- Flooding in Marston and Northway due to vast surface level parking
- Prime housing land wasted, which in turn would reduce the need to travel
- Makes life for residents miserable with endless traffic jams

No targets are set to reduce parking provision and does not address the climate change, environment and public health issue created by the hospital, with the clear implication that multi-storey car parking (*consolidation*) should replace surface parking rather than enforce a reduction to ensure the most efficient use of land is made, therefore it is ***ineffective***.

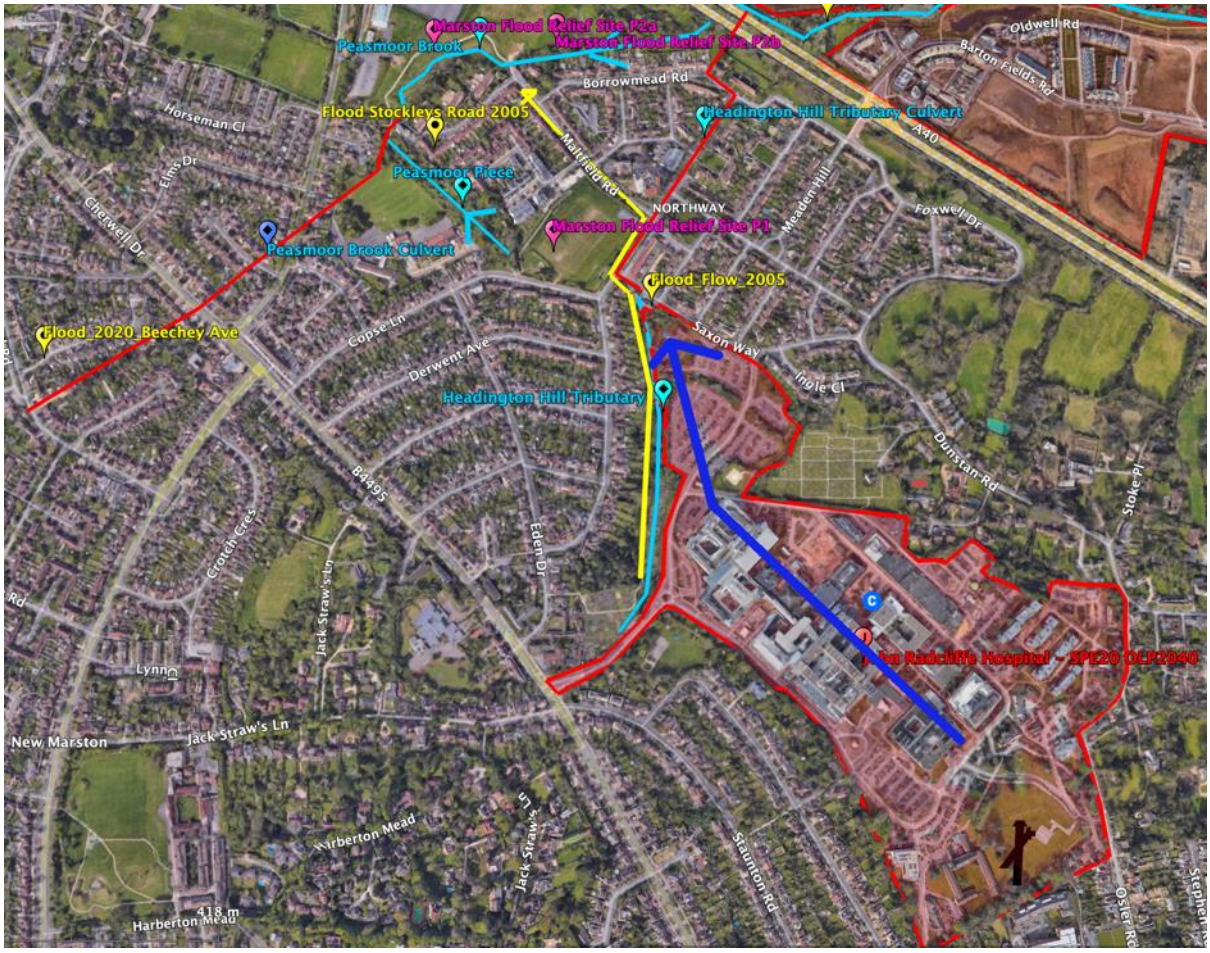
The car parks are retained by induced demand from staff (70%) paying less than £100 P.A. Even retaining parking levels, a split in favour of patients say 40/60% would resolve this.

Whereas the Council is prepared to suggest reduction of flooding as part of a development which is *ultra vires* as the most it can ask for is no increase, it cannot bring itself to even suggest a parking reduction may be beneficial as part of any development although this, with the other OUHT Headington Hospitals, is the single greatest planning challenge Oxford has.

John Radcliffe - Flooding

The site is not "*within an area where development could exacerbate surface and/or foul water flooding*" the football fields of non-porous tarmac surface car parking, it is wholly misleading to describe this as an area, these are the source.

The blue arrow shows the broad flow from the John Radcliffe car parks and surfaces into the Headington Tributary, where the taxpayer kindly spent over a £1M to put in attenuation systems in Northway rather than remove the car parks or force the OUHT to address surface runoff from its car parking.



JR Hospital Flooding from Surfaces (Car Parking and Buildings)

Flood mitigation is NOT sufficient, reduction must be enforced

Thames Water and the Environment Agency, to establish the appropriate drainage ***mitigation*** *measures for any development.*

if sufficient drainage ***mitigation*** *measures are incorporated into the design of proposals.*

The Lye Valley SSSI (para e) has NOTHING to do with this Site Policy.

Heritage

The statements "*and the historic village structure of the adjacent Old Headington Conservation Area*" "*adjoining Old Headington Conservation Area and view*" and "*to the east, tree cover and hedging is dense but with some breaks, buffering the site from Old Headington Conservation Area"* are all factually incorrect, a large part of the John Radcliffe site is IN the OHCA, including the green and the old hospital.

The policy ignores John Radcliffe Green, (See Policy Map Example - Old Headington and John Radcliffe Green under G1-G9) the stone walls, (listed), and Cuckoo Lane (local heritage asset) and significant view lines noted in the Old Headington Conservation Area Appraisal:

John Radcliffe Hospital, OHCA, Cuckoo Lane and Significant View Lines (OHCA Appraisal Map 2)

Policy SPE5: Modification Requested

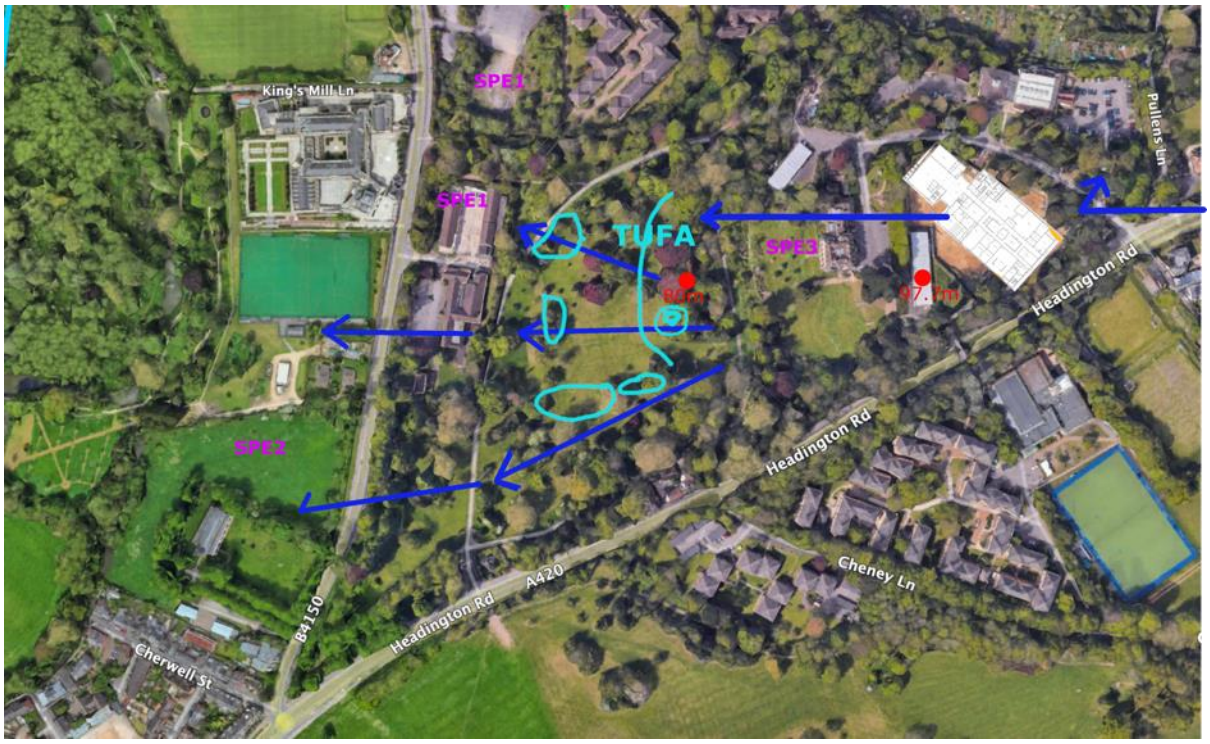
See: 12 (Churchill), responses to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7 and Lye appendix.

And:

- Reinsertion of text to reduce car parking where possible and permit no uplift
- Amend text : *"issues including parking are considered in a comprehensive way to make the most efficient use of land."* Amend to: *"The Council will seek a reduction in a comprehensive way to address the climate crisis and realise essential health, social and environmental benefits and make the most efficient use of land."*
- Reduce parking in exchange for further development as discussed (Response R6 – Air Quality)
- Protection and mapping of JR Green as Core Green Space
- Protection of Cuckoo Lane, Listed Walls, Treelines, significant view lines
- Emend: "*with most of the site directly adjacent to it*" to "*within the setting of"*
- Removal of confusion around reduction and mitigation of flood risk in favour of reduction or "net-zero" for legal compliance
- Enforce use of SUDS and other systems with policy specifying that civil action will be taken if runoff continues
- Clear parameters for the protection of Cuckoo Lane, a non-designated heritage asset, listed walls and original John Radcliffe building and heritage barn near Osler Road/St Andrews junction

POLICIES SPE3,SPE6, SPE11 – PEAT AND TUFA

Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park, estimated flows shown in dark blue.



Site Allocations Above (SPE numbers have changed) – TUFA, Peat and Flows

Policies Above: Modification Requested

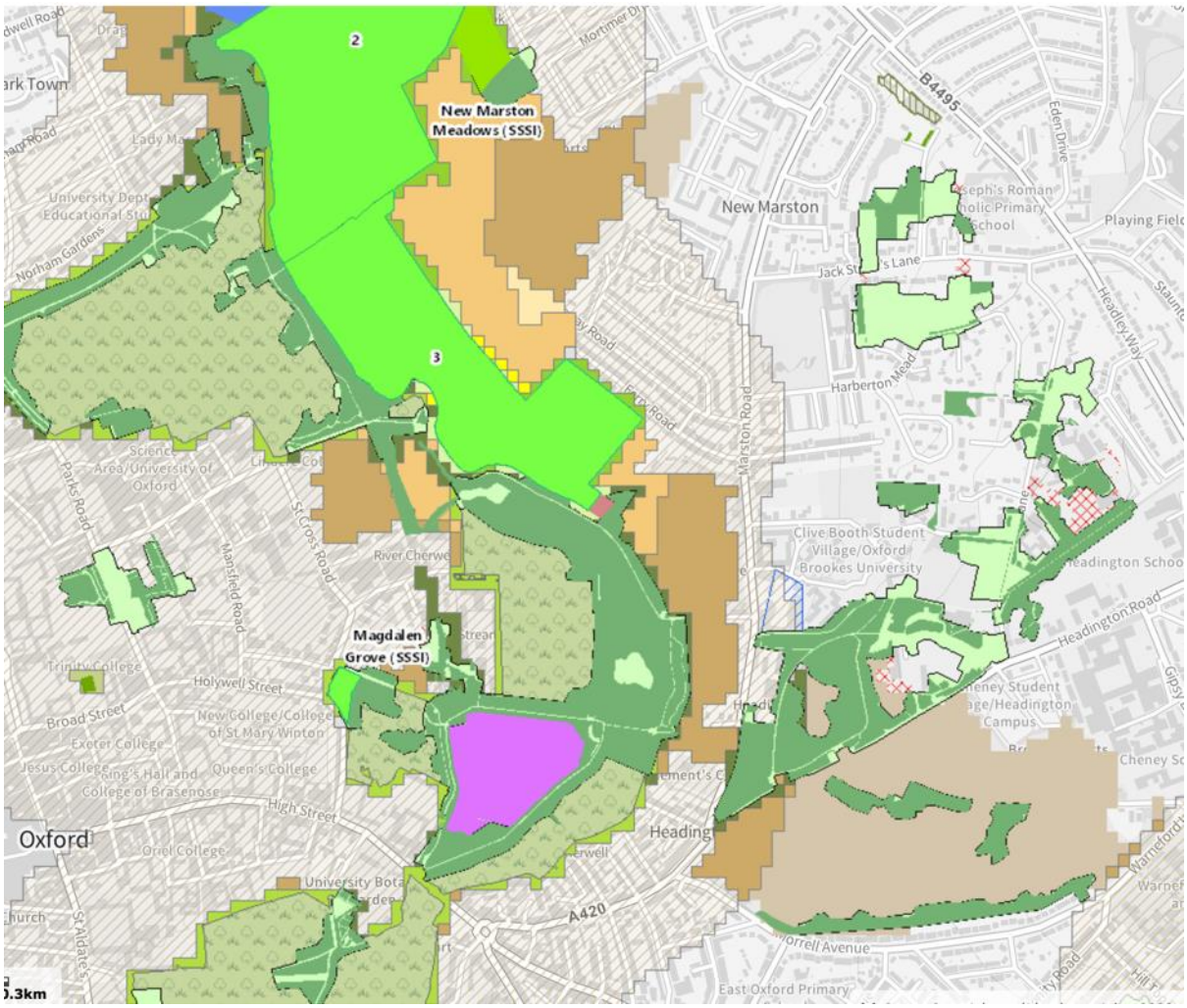
For all of above policies hydrological and fen survey required, and recovery where possible.

POLICY SPE6: LAND SURROUNDING ST CLEMENT'S CHURCH

Waffle.

As the Marston SSSI is upstream of this and SPE1, it is very hard to understand how it could possibly affect it.

This is far too close to the floodplain of the Cherwell at the western side, and cuts into the wildlife corridor of the Cherwell:



Wildlife Corridor and Network Enhancement Zone 1 (Brown) (NE Magic Map)

Policy SPE6 Modification Requested

Development should not be permitted here, or only at very low density, remove minimum number of houses, clear recognition of its role in the wider wildlife network, it is not possible to set back from Marston Road without being too close to the river and its wildlife corridor and heritage value.

Gardens with rich planting along boundaries should allow more diverse routes through the site for wildlife, connecting the river with neighbouring sites.

Is unenforceable therefore ***ineffective*** this can only be achieved by a green, unmanaged corridor.

Parking should be kept in the public realm where possible and could be located close to the Marston Road

Remove, the public do not want to look at a car park immediately opposite Headington Hill Park.

There is no point having a Conservation Area if this sort of development is permitted.

Cannot be developed with SUDS as it is on the groundwater table and will increase downstream flooding.

Section Peat and Tufa above.

POLICY SPE8

: MANZIL WAY

Waffle

"Could be car free" – Must be.

Policy SPE8: Modification Requested

Make a single statement that actually means anything or constraints anybody in any way, the "policy" is almost meaningless.

POLICY SPE10: NUFFIELD ORTHOPEADIC CENTRE

Waffle

Approve residential development, but not clear why not employer-led as per HD6.

Policy SPE10: Modification Requested

See: 12 (Churchill), responses to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7 and Lye appendix.

Peat reserves are likely to be in the Lye Valley leading down from the NOC and Windmill Road/Old Road junction, these must be protected from being washed away.

Para c) - The "Impact risk zone" of the Lye Valley is a computer generated radius and is not relevant, the ground and surfacewater catchments, are.

"Consolidate parking" is ineffective as it is meaningless, a reduction is required.

High probability of roman potteries and medieval activity on the main road to Oxford now Old Road.

POLICY SPE13/: RUSKIN COLLEGE CAMPUS AND POLICY SPE14: RUSKIN FIELD

See separate submission. (Part 2)

POLICY SPE15: SLADE HOUSE

Site has excessive surface level onsite parking, and important green space that should be preserved.

Policy SPE15: Modification Requested

See: SPE6 (Churchill), responses to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7 and Lye appendix.

A footpath used to run from Horspath Driftway to the current ringroad and is still present for much of its length, although it seems householders have blocked this off, this should be reopened.

No statement regarding how extra staff will be managed.

Greenfield runoff rates must be achieved.

Green spaces must be marked on Policy Map and preserved.

Reduction in parking versus increase in staff (See R4 - Response Air Quality)

POLICY SPE17: UNION STREET CAR PARK

The reduction of the car park seems difficult to achieve without a severe economic impact as it is normally at or near capacity, therefore contrary to *Policy C2, Maintaining Vibrant Centres*, no rationale given for allocation, therefore is ***unjustified*** further it is ***ineffective*** as it relies on a future determination.

SPE18 - WARNEFORD HOSPITAL

Planning permission in progress already.

Policy SPE18: Modification Requested

See: 12 (Churchill), responses to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7 and Lye appendix.

MISSING EAST AREA POLICIES

These following East Area policies were in Local Plan 2040 and commented on, and all preceding plans, they are missing as below:

POLICY 440: 1 PULLENS LANE

The intensification of development directly contradicts Headington Hill Conservation Area Appraisal which refers to, in Part 3, Pullen's Lane to loss of residental character, and tranquillity.

There is simply no point having a Conservation Area if this sort of development is permitted.

The area north of Cuckoo Lane was identified in 1973 as an area in which the development of institutions should be restricted in order to protect the architectural and spatial characteristics of the area and to prevent the growth of traffic. In 1977 this distinction between the north and southern part of the conservation area was referred to specifically in the City Council's summary of the conservation area's significance

It is therefore ***unjustified*** as it is directly in conflict with above and cannot be reconciled with the character of the area.

POLICY 440: MODIFICATION REQUESTED

Removal of policy from local plan.

Possible Peat/Tufa issues with foundations crushing flows, survey required.

POLICY SPE3: HEADINGTON HILL HALL AND CLIVE BOOTH STUDENT VILLAGE

Very substantial damage has been done to Headington Hill Conservation Area by thoughtless insensitive development by the University. Cuckoo Lane in particular has been damaged by a "welcome glade" and expansive views of ugly buildings.

Much of this site boundary is in the most sensitive part of Cuckoo Lane yet this is not even mentioned.

Policy: Modification Requested

Deep foundations or hard surfaces can affect ground and surface water flows. Greenfield run off be required. **See:** Section Peat and Tufa above.

supporting ~~the setting of~~ the conservation areas to "not harming" this is IN the Conservation Area.

MISSING POLICY : OLD ROAD CAMPUS

Policy: Modification Requested

This site policy has been removed or forgotten, although in the current Local Plan:

Reinstate Policy for Site.

Issues are similar to the Churchill and should be the same as Churchill 12;

- Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs

- Onsite Parking
- Creating increased demand for housing
- Huge basements which remove water retention capacity of land

See: Responses to Policy H5 (Housing), Policy G1-G9, G6+G7 and Lye appendix.

POLICIES REMOVED AS LESS THAN 10 HOUSES

Contrary to national guidelines these important and sensitive sites were removed from the Local Plan as having less than 10 houses.

MISSING POLICY: VALENTIA ROAD (HELAA 329) (NONE)

The Local Plan 2036 Policy had a policy which will not be removed will lapse on the grounds it is potentially less than 10 houses.

See: Responses to Policy H1 (Housing, 10 houses), Policy G1-G9, G6+G7 and Lye appendix.

Policy: Modification Requested

A formal Local Plan policy backed with evidence and clear policies re groundwater catchment.

MISSING POLICY – COOLRIDGE CLOSE (HELAA 622) (NONE)

The Local Plan 2036 Policy had a policy which will not be removed will lapse on the grounds it is potentially less than 10 houses

See: Responses Policy H1 (10 houses), G1-G9, G6+G7 and Lye appendix.

NO further development should be permitted in the Lye Valley this is in the groundwater catchment of the Lye.

Policy: Modification Requested

A formal Local Plan policy backed with evidence and clear policies re groundwater catchment.

MISSING POLICY – WOOD FARM HEALTH CENTRE (HELAA 629) (NONE)

The Local Plan 2036 Policy had a policy which will not be removed will lapse on the grounds it is potentially less than 10 houses

See: Responses Policy H1 (10 houses), G1-G9, G6+G7 and Lye appendix.

NO further development should be permitted in the Lye Valley this is in the groundwater catchment of the Lye.

Policy: Modification Requested

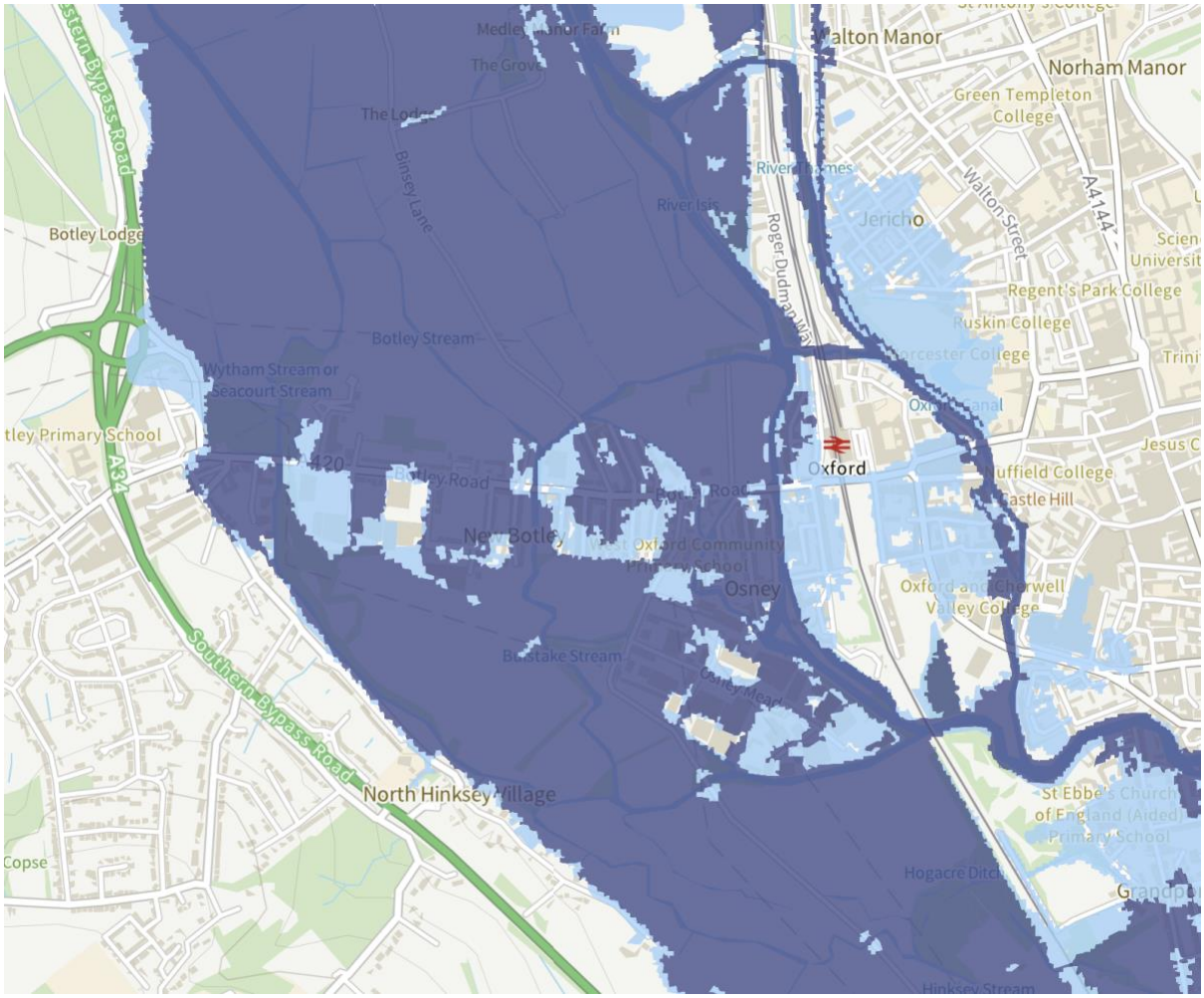
A formal Local Plan policy backed with evidence and clear policies re groundwater catchment.

WEST CENTRAL INFRASTRUCTURE AREA

POLICY WEBRAOF: WEST END AND BOTLEY ROAD AREA OF FOCUS

The policy does not address flooding although historically this area has flooded repeatedly. It is foolish to build to develop here. SUDS cannot work if less than one metre above the highest water table point.

Policy is unjustified due to flood risk:



Environment Agency Flood Map

APPENDICES

Appendix – Policy H1 – HENA

Objection to Housing and Economic Needs Assessment, Cherwell District and Oxford City Councils

Summary

The HENA (Housing and Economic Needs Assessment) report is the prime evidence source for the requirement for new housing, which in turn threatens our precious remaining green space, therefore the analysis must be very robust - it is deeply flawed.

In summary, it fails to:

- Provide a detailed analysis or separate section on Oxford, the main target of the report
- Understand the very special demographics (Universities, Hospitals) which substantially influence housing provision
- Analyze any of the growth factors in Oxford
- Separate correlation from causation - leaping to unfounded conclusions

Much of the report is largely irrelevant, counting angels on a pin, or an academic disquisition on the validity of different population methods (ONS/SNPP) which appear to differ at maximum by 20% due to inclusion/exclusion of migration as a source of population growth, and relying on historical trends rather than looking at future need with hard evidence.

It is almost meaningless to analyze historical housing trends as this is in turn influenced by the cost and availability of housing, yet the entire report is predicated on this – analysis of past trends is not a predictor of future need.

It is disappointing the statutory requirement for consultation is buried in "*Oxford Local Plan 2045 Reg 18 Part 2 Consultation*" here:

https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2045-reg-18-part-2-consultation/

Whereas it exudes a spurious air of thoroughness, it utterly fails in the objectives stated.

Demographic Analysis

Oxford has a relatively few, large institutions, and companies, which combined with the secondary employment that services these, accounts for most of the housing and dwelling demand:

These are:

- Hospitals
- Universities
- Laboratory and Health Sector
- BMW Plant

All the institutions except the BMW plant have a very unusual demographic as below, entirely unrecognised in the report.

Key Workers, Lecturers, Researchers and Students - Characteristics

Characteristics - A very broad generalization:

- Need medium-term, cheap accommodation
- Do not want or require a car
- Can live in groups in halls or shared housing
- Have low income
- Frequently single, no, or few children
- Do not have, or share offices

Many of the above are looking for cheap, medium-term one bedroom accommodation to do Degrees, Junior Doctor residencies and other temporary placements. Many early career staff simply want to "do their time" in Oxford before moving on.

Report Demographic Analysis Failures

It is surprising that hospitals, teaching and students are considered to be of such little importance that they were not even included, given their very special demographics and needs, whereas the relatively small Industrial, Lab Tech and general office sector are addressed in depth.

The assumption that households rent because they cannot afford to buy is tenuous at best when so many are in temporary residence.

The report only mentions young professionals once in an anecdotal trope suggesting they want cheap flats near good nightlife, rather than due to the desire to save transport costs.

Oxford University is mentioned only in the context of laboratories.

The core assumption that housing is "employment led" is, given the large student population largely false, and where a factor, has atypical demand due to the large number of single key workers and temporary residents.

Calculations are derived from housing numbers and residents per house, rather than all residents living in Oxford in hall, lodgers, or Key Worker accommodation from which right-sized housing figures could be derived.

Given population characteristics, the in-depth analysis of office space and to a lesser extent, employment land, is particularly fatuous.

The consequences of the unique demographics of Oxford are not addressed or discussed in the HENA

Data Collection Survey

Given how few large employers and Universities there are, a commonsense approach would have been to send a survey to each asking:

- Demographics of Staff/Students (Single, Married, Children, Income)
- Future growth plan

Put simply, just count staff and students, understand their needs, and add reasonable growth uplift to extrapolate the base demand rather than fiddle with spreadsheets

No attempt to conduct this very basic, commonsense exercise has been attempted in the HENA

There is a very strong relationship between this "market" and the general market. Dwelling provision here impacts on the wider market, freeing capacity for general residents, this is wholly unrecognised or discussed in the HENA.

Housing Created by Infill

Key inputs into the calculation for housing will reduce demand are entirely missed:

- Huge housing and student accommodation projects in being built – Barton Park, Land North of Bayswater Brook, Oxford Brookes Headington Hill Student accommodation etc
- 10,000s Per Annum of householder and small developer applications that uplifts existing housing, either by creating new dwellings, or uplifting existing housing from two bedrooms to three etc

Very frequently, new developments taking place above retail or spare land in older dwellings, each creating independent living spaces.

The assumption that identified housing need must be met with yet more new housing is therefore fundamentally false, both due to the interaction between student and general housing markets and the factors above. This is wholly unassessed or discussed in the HENA

Conclusions

Housing and Dwellings Requirements

The main housing requirement is for high density one-bedroom accommodation without car provision close to the place of employment or study for the demographic identified above.

This:

- Makes efficient use of land using height and reducing space wasted on transport infrastructure (parking spaces, garages)
- Reduces commuting inflows
- Frees existing older build family housing for family housing, freeing family housing

Car-free, high-density developments are used by Oxford residents as per above, edge of town car-dependent low-density estates may be used by those needing a central place in the South-East, contributing, not resolving Oxford's housing and environmental crisis, wasting valuable land.

This is wholly unassessed or discussed in the HENA

Incorrectly Assessed Housing Need

It can be concluded that, with the correct policies applied, overall household need is exaggerated as:

- No account is made of large, ongoing developments, including student accommodation
- Large, high density housing provision would obviate the need for new family housing
- Infill development is entirely absent in the calculation, representing 1000s of new dwellings per year
- No attempt is made to identify good candidate housing land at the Headington Hospitals, currently car parks, must be used for Key Worker housing

Housing Policy that addresses the special needs of Oxford's demographic can make efficient use of land, reduce commuter in-flows and car-based edge of town developments that are attractive to residents with no or little connection to Oxford, and preserve the few remaining green spaces

Fitness For Purpose

What was required was an in-depth analysis to develop an understanding of the interactions and synergies of the complex factors driving the housing requirement, the merits and demerits of alternative housing strategies, and which policies would produce the optimal result. This is entirely absent from the report which simply arrives at a set of housing numbers, having formed a situational view based on flawed data, it failed to produce a strategy.

Given the failures above, and the fundamental importance of the report and the potential damage that will be done to Oxford's and the surrounding area's greenspace, the report must be rerun with a more commonsense approach using the meaningful inputs identified above.

The HENA is UNFIT for purpose and must be rerun.

APPENDIX – THE LYE VALLEY

Please see also Part 3 of Headington Heritage submission to Lye Valley SSSI - Hydrogeological Impact Assessment Report.

Lye Valley SSSI – An Introduction

The Lye Valley and the associated SSSI (North and South Fen units) survival are dependent on rainwater infiltrating into the ground, on natural surfaces, becoming calcareous via flowing in aquifers and emerging at a springline ABOVE the sloping fens.

Groundwater will be lost via rainwater redirection from urban infrastructure such as rooves, parking, roads and other hard surfaces where it is lost via stormwater drains, evaporation or blockage of underground flows via foundations.

Thames Water stormwater drains running along the Lye Valley also scour the Brook causing water to flow under the fen. The brook does not supply water directly to the fen, but helps to maintain hydrostatic pressure and slow groundwater loss.

The fen is on life support and any further ground water loss is unacceptable.

NO LOSS AT ALL of ground water in the ground water or surface water catchments can be acceptable. Every new development is only an incremental loss but cumulatively new hard surface and/or attachments to Thames Water drainage has led to approximately 60% loss of natural ground water to the Lye SSSI due to redirection of flows from infiltration into the ground to Thames Water drainage and lost to the the fen.

Important areas outside the SSSI are also worthy of protection. (Warneford Meadow, Lye Valley LNR and the Boundary Brook Wildlife Corridor and restorable former fen areas)

Key Points

- The Lye Valley SSSI, comprising of North and South Fens are the only surviving patches of a once extant ice-age fen under high risk of any negative change to flows
- Any SUDS/Soakaway in the groundwater catchment is unacceptable, as per Lamberth below
- Foundations especially pile foundations will piece the impermeable clay base of the aquifers leading to loss of water to the fen
- Surfacewater drainage rates into the sewers increase with development leading to a higher probability of foulwater release in the fen (drain runs across), as sewers overflow due to misconnects or order mixed systems
- Excess surface drainage can cause flooding downstream at Cowley Marsh/Iffley or lead to erosion of the fen in flood events, now probable with climate change

Lye Valley Catchments Overview

The Lye Valley SSSI consists of two Units, the North (Thick **Green)** and South Fen **(Purple)**. The Thames Water stormwater catchment is marked **Orange**

The Groundwater catchments described below are marked **Green**, the Surface Water catchments **Blue**. The yellow line in the centre of the maps is the shape of the Lye Valley for clarity.

Lye Valley Catchments Overview Map [EN1]

Lye Valley Catchments Central Map – Central (Source: Lamberth, Thames Water)

See the following interactive map also:

Lye Valley Catchments

A Set of Natural Ground Water Catchments (Green)

The maps above show the North and South Fens of the SSSI and Boundary Brook groundwater catchments in **Green**.

The following shows the groundwater flows running generally NE to SW note the South Fen (Solid **Purple**):

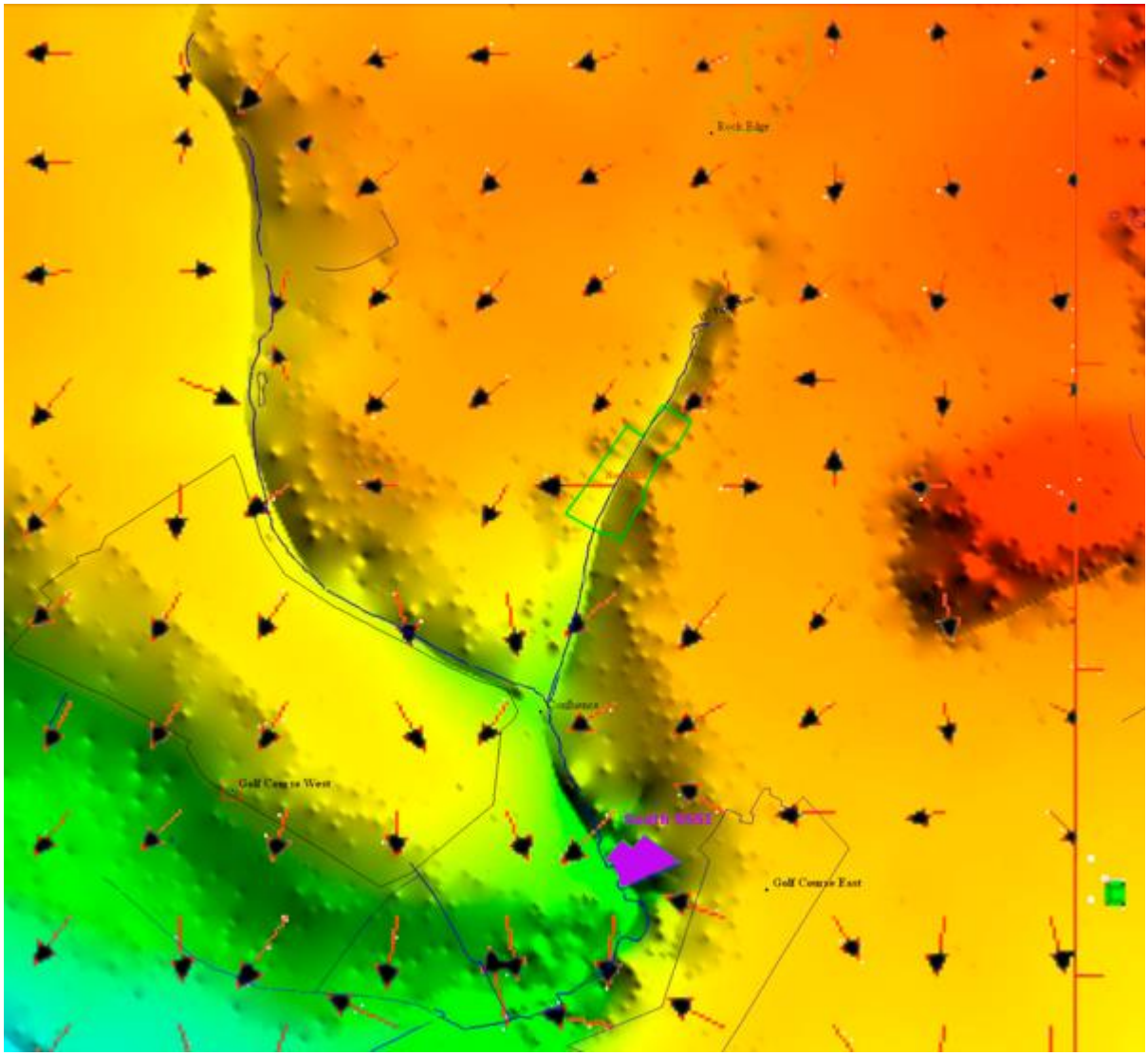


Fig: Lye Valley Illustrative Groundwater Flows (Lamberth, Fig 4)

Groundwater catchments are small, with the South Fen the smallest, as is the fen itself.

Rainwater in these catchments that does not enter the storm water drainage system will infiltrate into the ground, flowing according to strata inclination (NE-SW), become calcareous, and nourish the fen by emerging at the springline ABOVE the fens.

Issues are as per Thames Water storm water catchment below, but ADDITIONALLY deprive the Lye Fen of vital groundwater, as all water entering the storm drains is lost to groundwater infiltration. This is the most sensitive area where the most stringent measures must be taken.

Groundwater Catchments: North Fen SSSI Unit, South Fen SSSI Unit and Boundary Brook.

A Set of Surface Water Catchments (Blue)

Risks to the Lye Valley are as per Groundwater Catchment, but flows are dictated mainly by surface gradient.

Water from rooves, driveways, roads and hard surfaces flows into the Thames Water or sewers (two large, one smaller) and then in the Lye Brook at the head of the Lye Valley, shown in **Orange.**

Additional connections, paved areas and removal of greenery all increase storm flows to the Lye drains and downstream (Cowley/Iffley or Barton Park/Bayswater Brook/Oxford)

The Lye Brook has suffered severe erosion in places due to the irregular and often heavy water discharge from the surrounding urban areas….Any further urban development around the reserve [Lye Valley] would produce increased water run-off discharging through the Lye Brook and exacerbate the already serious erosional problems. (BBOWT PII 1986, 24)

Several sewage pipes cross the valley. If any were to rupture their discharge could seriously pollute the streams.

The South Fen stormwater catchment does not discharge into head of the Lye Valley but still presents the same risk downstream.

The downstream flood risk is further detailed in Appendix A.

Surface Water Catchments: Lye Valley and Boundary Brook (Simplified)

Artificial Thames Water Storm Water Catchment (Orange)

The orange area effectively acts as a surfacewater catchment area as urban drainage takes flows from a an enlarged, artificial catchment.

The South Fen Catchment

Groundwater Catchment and Flows -South Fen

The green line around the SSSI South Fen SSSI (**Purple**) is the groundwater catchment area for the fen. The brown line is the golf course for alignment of source maps only.

The above map shows the Development Site (**Red**) with T Pin and white label with ground flows marked as red arrows with black heads. (Lamberth 2007, Fig 4) [EN2]

Groundwater flows DO NOT follow the surface contours but the underlying rock strata from NE to SW. In this case a western flow can be observed but crucially, almost all flows concentrate at the development site marked in Red with a T pin in the centre) which is directly above the South Fen SSSI unit. (Purple)

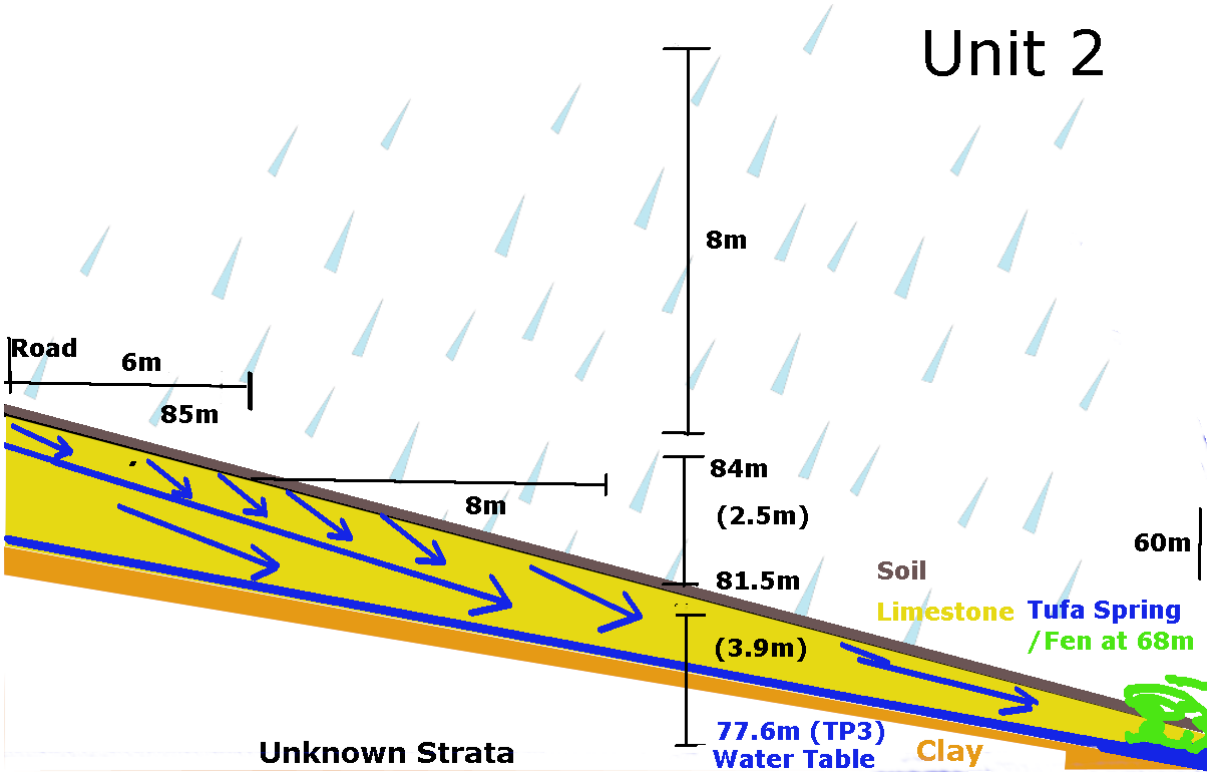
Development here will affect ALL flows from the entire catchment as it is a focal point just above the South Fen.

Flows Overview - General

PRIOR to a development:

- A layer of soil (0.3m) allows rainwater to be become saturated with CO2 (either through or over)
- This dissolves more calcium carbonate from the limestone directly below
- Water arrives at the impermeable clay layer and flows down to the Tufa springs which emerge where the clay layer meets the surface which feed the fen immediately below

Pre-Development Flows (Example)



Current – eg: South Fen

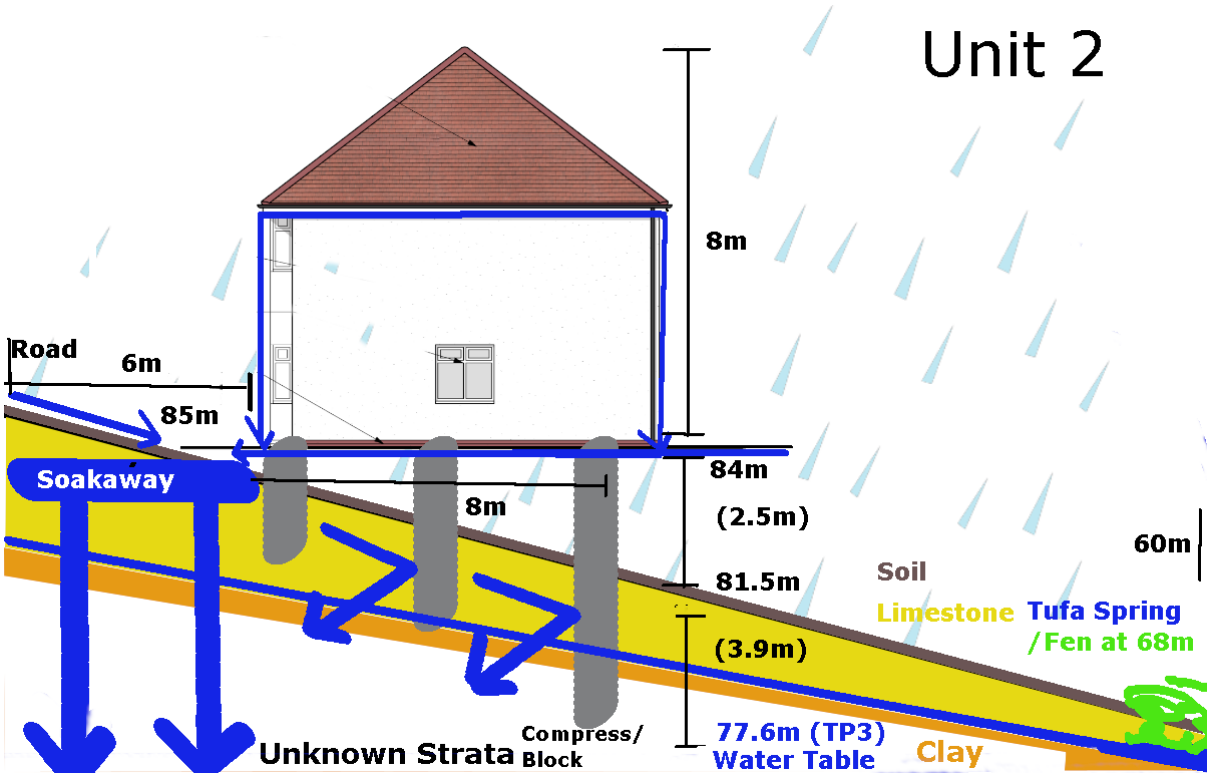
The Lye Valley is supplied predominantly from water passing through calcareous, base rich Corallian beds. Spring and seepage lines originate from where rocks meet the Oxford Clay. The groundwater has a uniform pH of 7.6 over the fen area. (BBOWT 1986 P1 70)

Impermeable clay forces groundwater to move laterally to appear as spring-lines on the sides and bottom of the valley. The perpetual seepage of groundwater and permanently water-logged conditions has resulted in peat formation in parts of the valley. (BBOWT P1 1986 1.1.2)

Surface water plays an important part in tufa formation. Carbon dioxide is formed as a natural process in active soils where the decay of humic material and the effect of plant roots and biological activity generate CO2 from respiration. This CO2 saturates rainwater percolating through the soil. In turn this CO2 rich water dissolved more calcium carbonate from the aquifer. Therefore, it is vital that catchments in the vicinity of a tufa spring have an active soil horizon[*]. Active soil horizons could be grassland, woodland or even an agricultural field but not hardstanding or a conventional SUDS system. Any man made system must have an indefinite lifetime. (Lamberth 2007,20)

[*] Soil with growing plants, good humus content and aerated by root growth and activity of worms and other soil invertebrates

Post-Development Flows



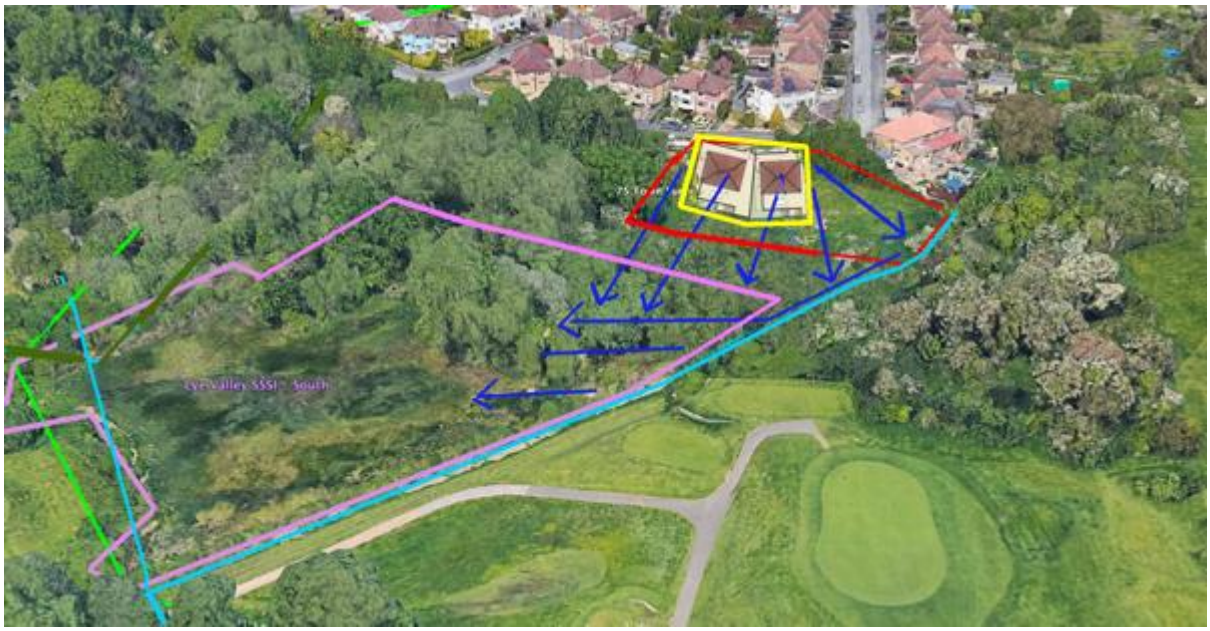
Site Post Development

Post development the following applies:

- ALL water that would have flowed through soil will now not gain CO2 from the soil as there is no contact at all - a loss of approximately 24m*12m*0.3m.
- Passage through the limestone will be quicker and more concentrated, water may be lost entirely to the fen reducing calcium uptake
- Foundations, will either pierce the clay layer, or compress the layers so that the water resistance will be impossible to overcome, leading to both loss of quality and quantity of water ***and blocking flows from the entire catchment.***

Pile foundations must on no account be used, as these will block flows and piece the thin layers of impervious clay below, leading to groundwater not reaching the fen. [See EN3 for source data]

Surface Flows – South Fen Example



A Proposed Development (Red) and SSSI (Purple), Surface Flows and Surface Area (Yellow)

The site surface flows are shown above (prior to development). Flows are evenly spread either going directly to the fen or to a ditch to the east which in turn wets the fen via installed log dams.

Water will infiltrate into the ground, mostly evenly over the site, and become calcified as the calcium layer is directly below the top soil.

The yellow area of the development will be lost, and be directed only to a small soakaway as discussed above.

Policy – Lamberth Recommendations

The following applies to the groundwater catchment:

Ground water protection zones are not fully mitigated by the use of SUDS therefore development within these areas must be restricted or eliminated. (Lamberth 2007, 39)

Can SUDS/Soakaway Design Be a Condition?

This very issue was considered by the Inspector (previous application) who concluded that a complete SUDS design and hydrological assessment for the effect on the fen acceptable to Natural England would be required ***for the grant of planning permission***.

I conclude on the second main issue[Groundwater Impact] that there is insufficient information before me to properly assess the likely impact upon the SSSI. ***As this matter could not be addressed by way of any suitably worded planning conditions, I find that the proposal would be at odds with the objectives of CS policy CS12.*** *(Appeal 21)*

Put simply, it was too important an issue to be a mere Planning condition as it is fundamental to grant.

Fen Fragility and Vulnerability

The groundwater catchment area is small almost all of which is heavily urbanised.

The key points from the Natural England Assessment and OCC Management Plan (BBOWT 1986) quoted below are in summary:

- Exceptionally rare and fragile rare species habitat
- Any adverse hydrological change either of quality or quantity of groundwater could result in severe damage or loss of fen
- Foulwater or mixed sewers could burst and destroy parts of the fen due to overloading
- The south fen is at or below minimal viable size

Conclusion: ANY development this close to the fen will damage the water supply to the fen as there is no margin of error, the damage from domestic gardens alone is well documented

The alkaline fen habitat at Lye Valley is an exceptionally rare and fragile habitat. ..., as well as protection of water supply to ensure the underlying peat remains waterlogged. There has been significant input of resources to protect this site .... An exceptional list of specialised plants has been confirmed as being present – many of these are extremely rare in Oxfordshire and some are at their southerly limit in the UK. Notable species present include [list]. This is a truly remarkable plant assemblage. The habitat is now also in very good condition to support specialised wetland invertebrates associated with alkaline mire. The area is very small and isolated in the landscape and remains extremely vulnerable to damage from a variety of pressures. In particular, it will be important to ensure that management input is maintained and water supply and water quality is protected. (Natural England Citation - Lye Valley SSSI - South Unit)

The damage already by 1986 by only gardens (on the western side of the Lye Valley Road and the Site on the eastern slope) was noted:

The development of gardens on the eastern slope of the valley in the 1950s [Lye Valley Road, Site], appears to have had widespread damaging effects on the fen flora. Partitioning of this area has resulted in damage not only by improvement of land in some gardens but also through its neglect in other, which has allowed the spread of the alder carr. (BBOWT PI 1986, 70)

If these fen areas are to survive it is important that the present hydrological stability continues. Lowering of the water table or pollution of the ground water supply could seriously damage the fen areas

At the southern end of the valley [ie South Fen] some areas of calcareous fen within private gardens [ie Lye Valley gardens] extending onto the proposed reserve [now SSSI] have been destroyed by mowing and the planting of commercial grasses, hedgerows and trees. This has led to a serious loss of fen flora in places, with only a few survivors such as Juncus effusus. ***Contrived 'improvement' of these gardens will result in further loss of habitat.*** *(BBOWT PII 1986, 24-25, extracts)*

The size of the calcareous fen community has decreased considerably in the last 50 years during which time some species of plant have become extinct.

The minimum size for a sustainable fen community may have been reached. It is *therefore paramount to maintain the fen areas at their present sizes and if possible increase them*

Species richness is heavily dependent on the size of the site. Topographical, land-use and hydrological changes to the Lye Valley, mostly as a result of neighbouring urbanisation, have all combined to reduce the size of the calcareous fen area. .. there has been a marked decrease in species diversity, particularly since 1964. Between 1964 and 1978 23% of Bowen's indicator species had disappeared, and between 1978 and 1985 a further 15%.

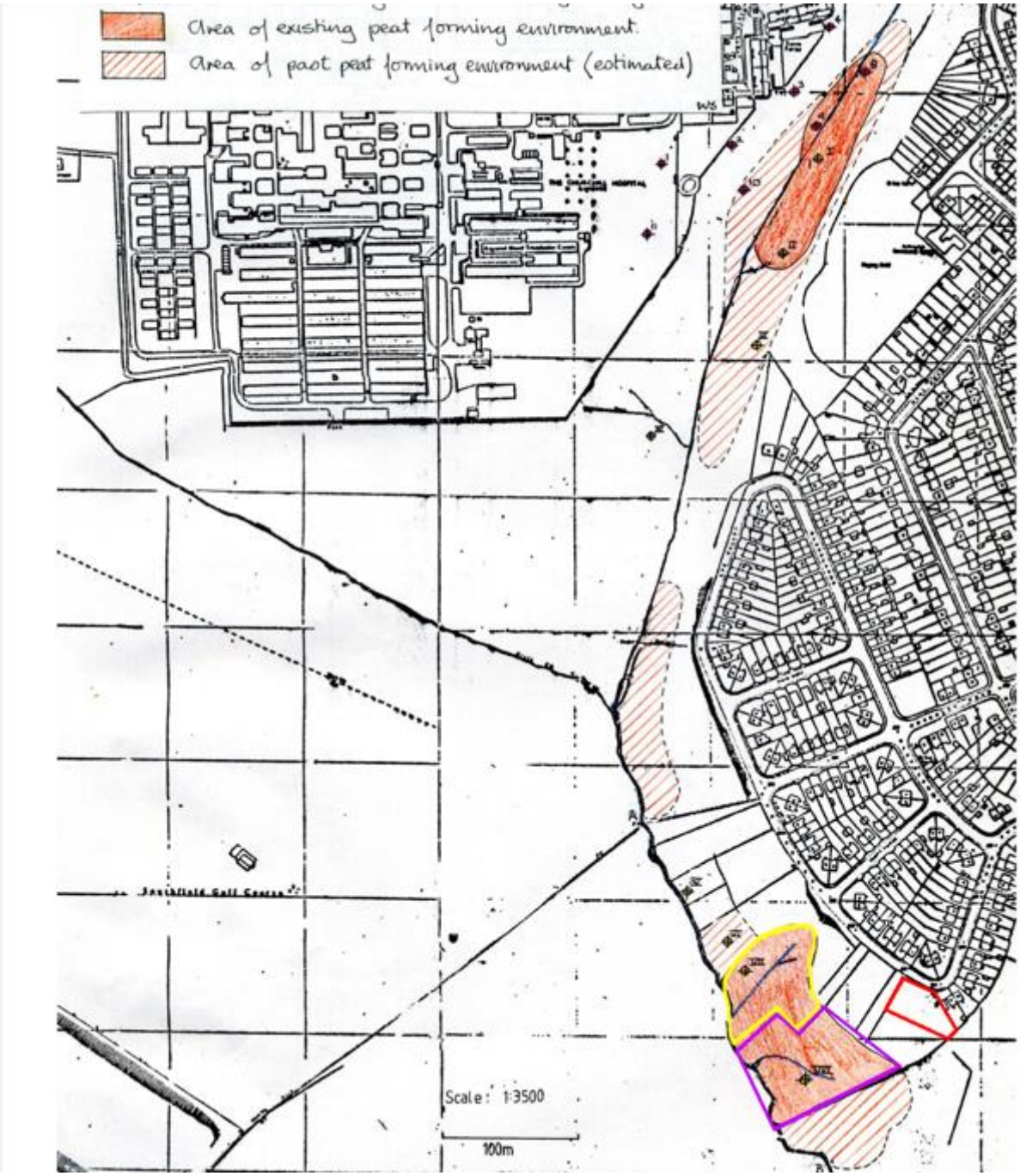
In order to ensure a high level of species diversity within the valley all the existing habitat types must be conserved. Of particular importance is the very species rich calcareous fen. This area must be maintained at least at its present size and preferably expanded.

Fenland habitats are very susceptible to disturbance due to the particular environmental conditions that form and maintain them.

(BBOWT PII 1986, 3-10 extracts)

In the annotated map below (BBOWT PII, Fig 13), the areas of active peat formation in 1986 are shown below (**dark brown**), with the past areas shown as brown stiped, indicates the severe damage done to the fen to 1986, which previously stretched unbroken from the current North Unit in the Lye Valley to the South Fen.

Much of the area to the immediate north of the Site (Red) marked as active peat formation, has now been lost or severely degraded: (**Yellow**)



OCC Management Plan (Annoted)– Areas of Active/Lost Peat Formation to 1986

Appendix – Population and Green Space Per Resident

These tables show the green space provision per suburb and population growth, from the Green Space Survey 2005/2007 and ONS.

Urban Village	Population	All Open Space (ha)	Unrestricted Open Space (ha)	Ha Unrestricted / 1000 Population	Ha Formal / 1000 Population	Ha Informal / 1000 Population
Abingdon Road	4958	57.74	31.70	6.39	2.00	4.39
Barton and Sandhills	4659	15.87	9.16	1.97	1.71	0.25
Blackbird Leys	12192	38.15	27.41	2.25	1.80	0.45
Botley Rd and Binsey	3154	61.73	21.56	6.83	3.79	3.05
City Centre	12747	47.06	40.30	3.16	2.45	0.71
Cutteslowe	2641	47.10	44.66	16.91	14.89	2.02
East Oxford	20924	152.35	61.66	2.95	1.81	1.14

Oxford Green Space Study – August 2005 ● 5-6

Urban Village	Population	All Open Space (ha)	Unrestricted Open Space (ha)	Ha Unrestricted / 1000 Population	Ha Formal / 1000 Population	Ha Informal / 1000 Population
Headington	19056	90.10	58.11	3.05	1.47	1.58
Littlemore	3197	33.47	3.19	1.00	0.57	0.43
Marston	6050	37.77	28.61	4.73	2.87	1.86
Risinghurst	2276	11.10	9.43	4.14	2.75	1.40
Rose Hill / Temple Cowley	14064	73.23	58.38	4.15	1.46	2.69
St Margaret's	9576	79.79	64.77	6.76	0.14	6.63
Summertown	7716	12.43	8.99	1.16	1.20	0.00
Wolvercote	1942	165.78	147.30	75.85	0.00	75.85
Wood Farm	8853	154.88	140.60	15.88	0.61	15.27
Not in Urban Village	-	29.90	14.91	-	-	-
CITY TOTAL	**134005**	**1108.46**	**770.76**	**-**	**-**	**-**
CITY AVERAGE	**-**	**-**	**-**	**5.75**	**1.98**	**3.77**

Table 5.7 Quantity of Open Space in Oxford

Area name	2001	2006	2015	2020	2025	2026
OXFORD	0%	6.3%	15.5%	19.2%	18.8%	18.7%

Barton and Sandhills	0%	17.2%	29.3%	66.6%	66.0%	65.9%
Blackbird Leys	0%	1.7%	4.5%	19.1%	18.7%	18.6%
Carfax (& Holywell)	0%	10.8%	19.0%	24.6%	25.0%	25.1%
Churchill	0%	9.8%	16.4%	20.4%	20.0%	19.9%
Cowley	0%	3.2%	9.0%	11.8%	11.3%	11.2%
Cowley Marsh	0%	6.1%	32.4%	34.1%	33.3%	33.2%
Headington	0%	4.7%	9.8%	10.9%	10.3%	10.2%
Headington Hill and Northway	0%	2.6%	13.6%	13.0%	12.6%	12.5%
Hinksey Park	0%	8.7%	11.4%	11.0%	10.5%	10.3%
Iffley Fields	0%	3.2%	7.0%	10.0%	9.4%	9.3%
Jericho and Osney	0%	7.8%	15.6%	16.5%	15.8%	15.6%
Littlemore	0%	3.8%	38.7%	39.4%	38.8%	38.6%
Lye Valley	0%	5.7%	13.5%	14.4%	13.8%	13.7%
Marston	0%	3.1%	8.6%	8.1%	7.6%	7.5%
North Oxford	0%	1.6%	12.7%	12.5%	12.0%	12.0%
Northfield Brook	0%	3.9%	4.8%	4.4%	3.9%	3.8%
Quarry and Risinghurst	0%	7.0%	14.1%	19.3%	18.8%	18.7%
Rose Hill and Iffley	0%	3.1%	20.3%	19.9%	19.4%	19.2%
St. Clement's	0%	11.9%	17.7%	17.7%	17.1%	17.0%
St. Margaret's	0%	13.4%	20.5%	20.3%	19.8%	19.7%
St. Mary's	0%	5.4%	9.1%	9.4%	8.8%	8.8%
Summertown	0%	4.3%	10.1%	9.9%	9.4%	9.3%
Wolvercote	0%	3.2%	20.6%	29.0%	28.5%	28.4%

Population Increases 2001 - 2026

Source: Oxford City Council:

https://www.oxford.gov.uk/downloads/file/1086/oxford_population_estimate_2001-2026

OXFORD LOCAL PLAN 2045 – RESPONSE – Part 2

Ruskin Field(s) and Campus Sites SPE14/SPE13

Mark Pott
Headington Heritage
Saving Headington's Heritage
A Personal Blog

http://headingtonheritage.org.uk

This is Part 2 of response to the Local Plan 2045 addressing Ruskin Fields and Campus

Part 1 addresses the Local Plan in general and Part 3 the Lye Valley Hydrological Impact Report

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INTRODUCTORY NOTE

SPE14, Ruskin Field is incorrectly named as it encompasses several fields.

There is no such entity as "Ruskin Field" except the Site Allocation in the OLP2036 (SP56) which referred to one, and only one, field, which is the most southernmost of HELAA 463 behind a line of trees. SPE14 is the remaining Ruskin Fields.

Some references may still show SPE14 as including SP56 due to pressure of time.

I wish to represent and participate at the Planning Enquiry for SPE13 and SPE14.

Policy SPE14 – Ruskin Fields: Modifications Requested Summary

Removal of site from Local Plan to support original decision in 2012 as ***undeliverable*** and ***unjustified*** with too much loss for too little gain, or as per Policy S1 the "*adverse impacts of granting permission would significantly and demonstrably outweigh the benefits*"

The key issue is whether the test given in Policy S1 "any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits" can be met. It can not, also this is an all-or-nothing, any building here will destroy the value of Ruskin Fields.

It is not possible to meet both the requirements in S1 and address the cumulative impact of addressing all the other policies of OLP2045 (Green, Historical) for example, giving public access to the land and providing green features, noise, setback, preserving the green ring around Old Headington and not doing harm to the Conservation Area which would automatically reduce the benefits and quantity of housing, therefore allocation is ***unjustified****. This was the clear conclusion of the Planning Inspector in 2012 who addressed this very question even before massive new housing estates were built. (see below)*

The Site Assessment has a very ambitious assessment of only 88 houses or 0.35% of the total required (see below), the policy permitting development for only 28 houses will guarantee the destruction of all conservation and amenity value for very little gain, therefore is ***unsound****.*

The Council has signed an undisclosed agreement worth over £750k with UWL to permit access via Foxwell Drive over its land, giving rise to the perception of a lack of impartiality in its function as Local Planning authority.

These communications and meetings, and the submission made by UWL (and all others) as part of the Reg 18 phase have been kept secret despite multiple requests for publication to be able to provide public scrutiny of the proposals.

If this land is consented for development, greenfield in a Conservation Area, it will render national planning policy ***ineffective*** *as a whole, as it will be wild-west, anything goes, anywhere, and OLP 2045* ***ineffective*** *as the allocation would violate multiple other policies, rendering the whole as self-contradictory, and therefore* ***unsoun****d.*

The objections described here are both individually and cumulatively sufficient to refuse site allocation.

Ruskin Fields - Summary of Value

- Is an integral part of the Old Headington Conservation Area (OHCA) preserving the rural setting of Old Headington with a "green belt" of fields, maintaining its identity as a "*Village in a City*"
- Is not in the "*setting*" of the Conservation Area, it is part of it - that which is to be preserved
- Huge amenity value as the last fragment of countryside, especially for residents of green space deprived areas (GI Spaces) at Barton and Barton Park, soon to be surrounded by the Land North of Bayswater Brook development walking to the Headington District Centre.
- This is the last connecting green corridor for wildlife in the area from Marston to the North East, the designation of green supporting is clearly insufficient
- Tufa springs, fen remnants and proven large peat deposits on adjacent fields perform a valuable carbon capture role and permit an ecology identical to that of the Lye Valley SSSI
- Provides views in and out of the Conservation Area, especially from the Land North of Bayswater Brook development at Elsfield, and from Stoke Place to Elsfield.

Site Allocation Objection Summary

Ruskin Fields, SPE14 allocation policy is ***ineffective***, ***unjustified***, ***contrary to national policy, undeliverable*** and therefore ***unsound*** as:

Summary – General Policy Conflict

- Allocation would be contrary to multiple NPPF, and OLP 2045 draft policies and the Old Headington Conservation Area Appraisal (2011) therefore rendering the OLP2045 ***unsound*** as a whole as allocation would contradict, and render ***ineffective***, the Local Plan.
- Ruskin Field Local Plan 2036 Site SP56 (between SPE13 and SPE14) will be built on before the expiry of the current plan and before the start of OLP2045, therefore NO green setting could be provided.

Summary - Housing Need Justification

- The logic is always that, to justify the loss of heritage and greenery the entire site must be housing, but if this is done, no heritage or greenspace will remain, therefore the site is, in any proposal, ***undeliverable*** and ***unjustified***, especially for potentially only 28 houses, the site allocation plan SPE14 indicates the constraints which cumulatively makes the site allocation ***unjustified*** as few houses can be built.
- Oxford will, under any of the three local government reorganisation proposals, become a larger entity with more room for appropriately placed housing, neighbouring Councils are already engaged under the Duty to Cooperate
- The identified Oxford need is 21,740 houses (Ref: Duty to Cooperate) of which Oxford can only provide 9,267 (H1) in a market which extends from Banbury, Abingdon and beyond. Ruskin Fields, assuming 88 houses (Ref: Site Assessment (H) - 25dph*3.51ha=88, unachievable) this would be 0.35% of this number for the losses below
- For the reasons given in response to H1 (Response - Part 1) actual already delivered capacity uplift in Oxford is greater due to extensions, small and student and small developments, and sites less than 10 houses (excluded from Local Plan)
- The constraints on the site will mean insignificant housing gain for substantial loss of heritage, conservation, and amenity value (***unjustified***)
- Since the site allocation of the southern Ruskin field in the Local Plan 2036 (SP56) 2300+ houses have been consented to the north of Barton Park (Land North of Bayswater Brook) and other local sites, rendering this development now ***unjustified***, both for housing provision and the increased need for the amenity of the very short Stoke Place lane to Headington and a tiny fragment of surviving rural landscape surrounded by development

As per the Inspector's reports Barton AAP, Site DPD (2012) below, is impossible to provide any meaningful quantity of housing without causing significant harm to the Conservation Area, and the number of houses that could be provided is insignificant compared to the other very large developments which service precisely the same housing market (Headington Hospitals, Oxford), therefore ***there was, and is, no clear and convincing justification.***

Even if the now assessed capacity of 88 houses were achievable it will cause severe damage caused to OHCA and the environment so is ***unjustified*** in view of the very large ongoing

housing delivery in the immediate area as below, the red sites below are all since LP2036 when Ruskin Field was allocated, so this is now ***unjustified.***

Approved Nearby Site	Delivery (approx)
Barton Park	889
Land North of Bayswater Brook	1500
Hill View Farm	159
Land West of Mill Lane	80
Park Farm	60
Sandhills Field	76

Adjacent Sites Allocated (Red=Since OLP2036 when Ruskin Field SP56 was allocated)

Fig: Huge Development North of Bayswater Brook and Sandhills Field Are Out of Oxford Boundary

Ruskin Fields (SPE14) in Context – Tiny Patch of green being surrounded by Barton Park and LNBB

Most residents of Oxford outer suburbs commute more than 10km to work, so housing does not contribute to Oxford's local need (ONS) so housing is ***unjustified***:

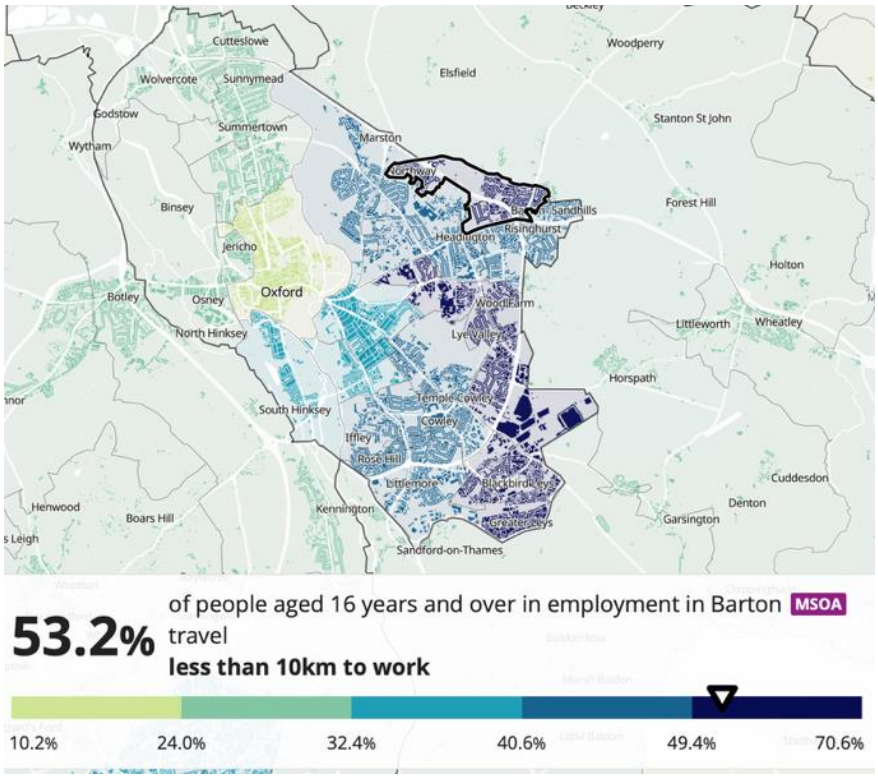

Fig: Oxford's outer suburbs have a high proportion (50% approx.) commuting to outside the city (Darker)

Summary - Deliverability

The site is ***undeliverable*** as:

- To the west, springs, peat and fenland exist near Foxwell Drive from streams flowing from hill above, blocking access, in addition to a covenant on the land here
- To the north, noise due to proximity to the A40 ring road and view lines make any development impossible
- To the east, Stoke Place and the amenity of the fields, and proximity to the main village and high visibility
- To the south, fenland, peat and high visibility from the future Land North of Bayswater Brook (LNBB) estate
- It is not possible to delivery ANY housing without irresolvable conflict with multiple policies in the NPPF and OLP2045.

Summary - Significant and Substantial Harm to the OHCA

- The fields are fundamental to the *significance* of the OHCA which is defined as a "*village in the city*" not a collection of old buildings in an urban sprawl. It is not possible to remove three large fields from the OCHA designated heritage asset and not cause *substantial and significant harm (NPPF p.214 and NPPF section below)* This is supported by the Site Assessment and SA Appendix C, SPE14, Objective 11 red rating.
- The city already has a great deficient of green space, especially in the east
- Stoke Place is the last green lane in Old Headington, providing access to Ruskin Fields in the same way as a bridleway across private land.
- Usage as a cycleway or entrance to the development will destroy its charm and inflict substantial harm on the OHCA.
- Ruskin Fields are NOT in the setting of the Conservation Area, they ARE in the Conservation Area, it is that which is to be protected, explicitly added to the OHCA in the 1990s for this reason.
- It will destroy significant views in and out of the Conservation Area identified in OHCA (Old Headington Conservation Area) Appraisal and view cones from Elsfield and the consented Land North Of Bayswater Brook development.
- The fields have a use both for above, their visual amenity, and providing a green belt between Barton Park, Northway and Old Headington (NPPF para 143)

Summary - Green, Environmental and Flooding Issues

- The site has multiple ecological, environmental and conservation constraints, located on a calcareous springline with peat deposits and fenland.
- An isolated population of deer and owls to name but two continue to survive in this isolated green island between Oxford City and Barton Park and LNBB
- Barton Park development liable to flooding from both the consented Land North of Bayswater Brook development and from this proposal, and developments upstream at Sandhills Field.
- Substantial peat reserves exist at and adjacent to Ruskin Field at Dunstan Park, garden of 6 Dunstan Road and Larkin's Lane reserve (OPT) mirroring the Lye Valley SSSI and Headington Hill Park confirmed by geological surveys
- Forms a green corridor

Summary - Transport Issues

- Traffic to and from the estate will not be sustainable Old Headington is already a major hospital rat-run, with frequent queues outside The White Hart as cars become stuck
- The proposed road access here would exacerbate severe traffic around the John Radcliffe which already uses 100% of the road bandwidth.

Summary - Flawed Engagement

- The site allocation is probably based on flawed evidence, as Oxford City Council have repeatedly engaged with Ruskin, and have signed an undisclosed agreement for access via Cherwell Drive for over 750K.
- Due to the refusal of Oxford City Council to release any Reg 18 consultation responses, the basis for the allocation is unclear and untested

Summary – Inspectorate Rejection (2012) before new Developments

- The Ruskin Fields site (HELAA 463) was wholly rejected by the Planning Inspector as part of the Core Strategy and Barton AAP, the Site DPD 2012, Sustainability Appraisal and all parties (Labour/LibDem) in the then Council
- The Sustainability Appraisal for OLP2045 is full of errors, and conflicts with the two SAs performed for Barton AAP and the Core Strategy 2012, which concluded site allocation was not ***deliverable*** and ***unjustified***.

See: *Planning Inspector's and Sustainability Reports*

Ruskin Fields – Inspectorate Site Rejection in 2012

This site forms part of the Ruskin Fields site rejected in November 2012 by the Planning Inspector of the Barton AAP, part of the Oxford Core Strategy.

The key points were:

Date: 14th 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.***

Please refer below section "*Planning Inspector's and Sustainability Reports*" for the full Inspector's report, Sustainability Appraisal 2012 and DPD assessment.

Key Points - Measured Against the NPPF

Ruskin Fields are integral to the morphology and setting of the Old Headington village, which preserves its integrity as such whilst being part of the OHCA, a Designated Heritage Asset. Therefore any building here will cause high impact on the significance of Old Headington as *a village within a city.* (Paras 207-208)

It is highly desirable (Para 210) to sustain the fields as a "green belt" defining the surrounding areas of Old Headington, Northway and Barton Park, and provide an important green amenity during travel via Stoke Place and Headington District Centre, they make a ***very high positive contribution*** to communities. Their ***viable use*** is providing amenity and form.

Great weight (Para 212) should be therefore given to them as a heritage asset.

OHCA as a designated heritage asset, requires ***clear and convincing justification*** (para 213) which does not exist, for the clear ***substantial harm*** Weighed against the overall housing targets, current local housing delivery, (0.35%) and the harm both the asset, and violations of multiple other policies.

Para 214 clearly states authorities should refuse consent due to the ***substantial harm*** ANY development will do here. The development would fail to deliver ***substantial public benefit*** both due to its negligible contribution to the housing market, (0.35%) and the actual possible development being much less due to proximity to major, highly congested highway, location of fenland, a restrictive covenant, and location in the OHCA. Even if it were concluded the damage to the OHCA were less than substantial (which is inconceivable) it would still fail the public benefit test in Para 215.

This supported by the Site Allocation Assessment:

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

Clearly under Para 219, a new housing development on a greenfield site in a Conservation Area can only damage the significance, even one house here will destroy the function of the fields as part of a heritage asset.

Contrary to the following policies of the NPPF, it does not respect p.187 a. and b. of the NPPF *protecting and enhancing valued landscapes*

Policy	Policy Points	Assessment	Meets?
NPPF			
p.103	Robust assessment	As pointed out in Part 1, the Green Spaces Survey is fundamentally flawed in its methodology and outcome	NO
p.104	Surplus to requirement Replaceable	Essential as a green lung between Barton, Barton Park, Northway and Old Headington, not replaceable.	NO
p.143	The Government attaches great importance to Green Belts Green belt a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic town	Fulfils all functions of the Green Belt shown even if not designated as such.	NO

p.187 a/b	a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services	Damage to significant viewlines and view cones, see section below, *OHCA - Significant View Lines Destroyed* ff.	NO
p.214	Reasonable uses	The site is in use has vital green lung for the surrounding area	NO
p.214	Harm or loss	See introduction	NO

Key Points - Site Allocation Measured Against OLP2045

OLP 2045			
S1	a) Vibrancy of local centres	No Ruskin Fields is at least 938m from Waitrose, Headington the nearest shop from the closest point	NO
S1	b) Sustainable links	There are no bus services nearby	NO
S1	f) Ensure new uses are in locations where they will not harm the amenity of existing neighbouring uses	Stoke Place and its views are the only opportunity to enjoy countryside views	NO
S1	g) Direct new development away from locations…negative impact on blue/green network	Will destroy only green space between Land North of Bayswater Brook (LNBB), Barton Park and Oxford	NO
S1	h)Local historic context and respond to heritage	Will utterly destroy the morphology of Headington the "village within a city"	NO
S1	j)Adverse impacts v benefits	See above introduction	NO
S2	Efficient use of land/public benefits/nature/identity and character	Impossible due to conservation and environmental constraints, esp. with only 28 houses minimum	NO
H1	Efficient use of land	Not possible, housing goal not correct - see text	NO
G1	Core greenspace, not supporting	Land fulfils most criteria for core greenspace, not supporting green space. Wrongly categorised, provides flood storage for Barton Park on a flood plain immediately below, heritage and amenity value	NO
G1	Character of the area, views	No proposal can respond to the character of the area, or views	NO
G1	Hedgerows	A number of important hedgerows are on site	NO
G1	Loss or Reprovision Barton and Headington have low green space provision per capita (see Green Infra study 2007)	Not possible as core greenspace, nowhere to reprovision to and perform the same function	NO
G1	Movement Corridor	Only green link between Northway, Barton triangle and further afield Narrow corridor of green space connecting others See also:	NO
G1	Views	Significant viewlines from Stoke Place (OHCA Appraisal) Views from Elsfield See: *OHCA - Significant View Lines Destroyed, and Elsfield View Cone* below.	NO
G2	Also: *"spaces do not need to be publicly accessible, OLP2045 p.2"* addressed below c)Making Space for nature d)Opportunity to strengthen links e)Climate change f)Enhancing appearance of g) Conserving … historic environment j) Natural buffer…air and nose	Impossible due to space constraints, building housing does not improve greenspace provision or sense of place, or make space for nature The historic environment is not conserved by destroying the fields around Old Headington Noise can only be mitigated by setback of at least 100m, so the development becomes pointless Fields are public access/amenity as is a private field next to a bridleway as per Stoke Place Completely contrary to G2 paras c-g, j. (too close to A40) New public space can only be provided near A40, too close, already public space.	NO
G3	Urban Greening	Impossible to achieve, due to nature of development which must result in a net loss in ecologically and environmentally sensitive area	NO
G4, G5	Net Gains	As the site contains peat reserves, mature trees, and ancient meadow, populations of deer, owls etc and is greenfield, this is not possible to be met, a peat fen cannot be restored somewhere else.	NO

G6	Protecting Network	Site is located between the Barton Triangle, Larkin's Lane Nature Reserve and fields to the east and Dunstan Park and other fields to the west, to the north is Oxford and to the south Barton Park and LNBB therefore development providing a movement corridor. See: *Green Space, Green Belt and Incorrect Designation*	NO
G7	Flood Risk	Downstream flooding off Headington Hill from the John Radcliffe and TW sewers down Osler Road to Barton Park below is already and issue any development here will increase flood risk, especially along the existing channels identified on the BGS map. Further on, run off here will be added to that of the LNBB and Barton developments and increase flooding there and downstream in Oxford and beyond. See: *Hydrology, Fen, Peat Reserves, and Flooding*	NO
G8	SuDs	The groundwater level is too high at the base of the development for a SuDs system to be effective so drainage will need to be via Bayswater Brook which already will receive LNBB and Barton Park and other developments	NO
R2	Embodied carbon	Substantial layers of peat exist both on site and off. On site reserves can be predicted based on those of Dunstan Park and Larkin's Lane reserve, and garden of 6 Dunstan Road Landowner has not permitted a survey. See: *Hydrology, Fen, Peat Reserves, and Flooding*	NO
R4	air quality is mitigated, and where exposure to poor air quality is minimised or reduced	The site is bounded to the north by the A40, a very busy road with a 50 MPH speed limit which is neither enforced or respected, it is not possible to locate any part of the development far enough away to not impact on residents	NO
R5	Using SuDS	The SuDs area required is not available, and is immediately uphill of Barton Park, so water held here will be released downstream.	NO
R6	Planning permission will not be granted for proposals that would remove or dewater 10m³ or more of peat.	Large peat reserves are located at all streams and lowland flowing off Headington Hill – Lye Valley, Headington Hill Park, Larkin's Lane Park, and at the base of Ruskin Fields, Dunstan Park Field adjacent to Stoke Place has never been ploughed as part of former Hengrove Common (Hay) making the soil structure valuable See: *Hydrology, Fen, Peat Reserves, and Flooding*	NO
R8	Amenities and natural environment The natural environment and amenity of the current site will be protected. Unacceptable transport impacts Noise levels	More traffic in the most congested part of Oxford is unacceptable Amenity of fields from Stoke Place for residents of Barton, Barton Park, Northway and Headington and beyond lost. Only connectivity with the countryside left. Noise levels are excessive next to A40.	NO
HD1	Planning permission will only be granted for development of high-quality design that is responsive to its context, creates or enhances local distinctiveness, and ensures that the amenity of the natural environment is protected.	Impossible due to location in Conservation Area, will destroy local distinctiveness and the natural environment	NO
HD2	b) Is appropriate for the use proposed; and c) Is informed by an understanding of the impacts on the significance of designated and	Not appropriate for housing, impacts are substantial and severe on the OHCA. Multiple Roman pottery finds at this location Destroys green infrastructure Flood risk increased at Barton Park and beyond (See above)	NO

	non-designated heritage assets, including their setting and the potential for archaeological remains; and d) Protects and enhances green infrastructure features in accordance with Policies G; f) Flood		
HD3	respects and draws inspiration from Oxford's conservation areas, responding positively to their significance, character and distinctiveness great weight will be given to the conservation of that conservation area and to the setting of the conservation area where it contributes to that significance or appreciation of that significance. The urban grain such as specific settlement patterns, plot types and groupings of building Views, which includes long distance and close views, focal points at the end of a view, glimpsed views of spaces beyond and between; Setting of the conservation area and what the setting contributes to its significance great weight will be given to the conservation of that conservation area and to the setting of the conservation area where it contributes to that significance or appreciation of that significance.	Can not respond positively by destroying all items mentioned Old Headington is a "*village within a city*" with an intact "green belt" of fields, some of the last in Oxford. Ruskin Fields are NOT in the setting of the Conservation Area – they ARE the conservation area. Visually, it does provide a setting for Old Headington. Views from Elsfield will be destroyed Addressed in depth below, See: OHCA - Significant View Lines Destroyed,	NO
HD3	Substantial harm to or loss of significance of a conservation area should be wholly exceptional. unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment. Clear and convincing justification for this harm should be set out in full in the heritage assessment.	Substantial harm will be caused. This is 10% of the entire Old Headington Conservation Area (OHCA) 4.69ha v. 52ha for the whole OCHA, but considerably more of the parts which are publicly visible and not already compromised. See summary section on page 1 Substantial harm will be caused, justification covered below. See: *Summary - Significant and Substantial Harm to the OHCA*	NO
HD3	impact on the asset's significance and its setting and that it is demonstrated that the significance of the asset and its conservation has	Substantial harm will be caused to the OHCA, a heritage asset, by loss of green space, which is integral to protecting the morphology "*village within a city*" Impact on viewlines to crinkle-crankle wall.	NO

	informed the design of the proposed development.	Stoke Place bridleway is an attractive bridleway for a very short distance between Old Headington and the A40 It is not a non-designated heritage asset as it is part of the OHCA It is not possible to build a large development	
HD5	Archaeology	Site of Roman pottery	NO
HD6	Views	Impacts on significant view lines identified in OHCA Appraisal and Elsfield and LNBB viewlines The view from Elsfield to Ruskin is already impaired by the college and will be destroyed by a new development See: *OHCA - Significant View Lines Destroyed, View From Elsfield View Cone*	
HD10	Outdoor Space	The only possible location is near the A40, unacceptable and earmarked for housing to avoid fen.	NO
C6	Severe cumulative impact High Quality public transport	A development in this location will increase traffic though Old Headington which is already a rat-run There is no public transport within 400 metres of the site	NO

Ref: *Local Plan 2045*

https://www.oxford.gov.uk/downloads/download/694/downloads-for-oxford-local-plan-2045-proposed-submission-submission-draft

Key Points - Errors in SPE14 Site Allocation Policy - OLP2045

Policy SPE14	
Open space, nature, flood risk	
a) Important to setting of OCHA	It is not IN the setting of the OCHA it IS the OCHA, the setting is elsewhere. Fundamental point misunderstood – Old Headington
c) Gardens…	The site forms a wildlife corridor connecting green spaces, a bit ornamental planting will not assist here
d) Open Space	*undeliverable*, as building cannot occur next to the A40 so building must occur here
f) Peat reserves	Alluvial activity on site, peat reserves surround site See: *Hydrology, Fen, Peat Reserves, and Flooding*
g) Significant green features	Not possible, the fields are the green features
h) Siting	Again, not possible with. Other site constraints, buildings visible from all sides locally and from Elsfield and LNBB.
j) Low development	Impacts justification
o) Stoke Place	Will have all its charm destroyed by bike paths etc
p) Noise	See G2 response.

All of the constrains identified above impact on the justification as only a very low amount of houses can be built– respecting all of these constraints means there is no more justification for such destruction.

Key Points – OLP2045 - Site Capacity Assessment

The site capacity assessment, which is part of the evidence base on which the site allocation was determined has several factual errors.

Site Assessment - Section A/B - Site Overview/Open Space

It is not *currently vacant* it has never been used for any other purpose than agricultural it is a greenfield site designated as *supporting* not "*vacant*"

Public access exists via the Stoke Place footpath, this is no different to a bridleway across, or alongside, a private agricultural field. Unofficial footpaths existed until Ruskin put up KEEP OUT notices as it was clearly claimable as publicly accessible land.

Barton and Barton Park have very little useable green space, having the least per capita in Oxford (Green Spaces Survey 2007) – this was compensated by good access to countryside, now to be lost by the LNBB development and Sandhills Field which provided a very attractive stretch of countryside, now lost.

Site Assessment - Section C – Historic environment, character and local context

It should be noted that there have been changes to the area since 2011.

This is a key point, the significance and community value of the fields have greatly increased since the construction of Barton Park adjacent, and the future enormous development of LNBB, and very substantial local population rises due to densification of Headington, Marston, Northway and other local communities.

Site Assessment - Built Environment

Old Headington is a former village.

This is incorrect – Old Headington is morphologically and as a character area, still very much a village – the preservation of which was the goal of the declaration of it as Conservation Area.

Fields form part of the former setting of the village is more accurately expressed as forming part of the REMAINING setting of the village, this IS the setting, it is not "former"

Ref: https://www.oxford.gov.uk/downloads/file/3992/spe14-ruskin-field---site-capacity-assessment

There is good accessibility of the site to amenities and workplaces.

Even with pedestrian access via Stoke Place from the extreme SE corner, this is 938m to Waitrose, the nearest retail outlet, well beyond the 400m normally deemed a acceptable.

Site Assessment - Section H

Development of the northern area is not possible due to its proximity to the A40 ring road due to noise and health considerations, development to the south would have a disastrous impact on the OHCA due to the prominence of the location as seen from Elsfield.

Ref: https://www.oxford.gov.uk/downloads/file/3992/spe14-ruskin-field---site-capacity-assessment

Key Points - SA Appraisal Appendix C, Ruskin Field

The OLP2045 Sustainability Appraisal (SA) is incorrect on all key metrics as per below table:

SA Para	Policy Points	Assessment	Correct?
1.a	Clear Conflicts?	Multiple issues with NPPF and environmental constraints as described herein	NO
2.x	Flood Risk	The site is immediately above Barton Park which is already partly in Flood Zone 3 since EA estimations updated Water from the JR Hospital, Osler Rd and Headington Hill flows here – See main text NOT ADDRESSED IN ASSESSMENT	NO
3	Efficient Use of Land	Correctly marked as greenfield, but colour should be RED not amber, it maximises, not minimises, the usage of greenfield land. Fulfills all functions of a green belt. 28 houses for so much destruction cannot be justified, not efficient use of precious greenfield.	NO
4 and 5	Meet Local Housing Needs	Houses at Barton Park opposite are about 1.4m each and completely unaffordable for local residents	NO
6	Community Facilities	This should be red as residents would require them, and they are a minimum of 938m away.	NO
7	Open Space	No – Ruskin Fields currently provide open space as explained in the main OLP Green+Blue preamble, as it is viewable from Stoke Place and elsewhere	NO
8	Travel Choice	No facilities at all except across a dangerous crossing to Barton Park primary etc, where several near misses have occurred due to the at grade crossing there Clearly this is RED as every metric is as bad as it can be.	NO
9	Water body	A calcareous stream runs through the site	NO

10	Biodiversity	Deer, owls, foxes just about survive here although it is increasingly difficult due to urbanisation Why is this scored green in a Conservation Area? The housing will displace existing species and remove habitat	NO
11	Conservation Areas	**If the impact on the heritage significance to the OHCA is rated RED here, WHY is Site Allocation proceeding?** See below there are OHCA significant view lines and views from Elsfield	NO
Stage 2	Conclusion	Almost all assessment above is incorrect, it is unsurprising the conclusion is entirely wrong	NO

Ref: https://www.oxford.gov.uk/downloads/file/3984/sustainability-appraisal-oxford-local-plan-2045-appendix-c---site-assessments

Key Points - Ruskin Field against the OHCA

The following matches the contents of the Old Headington Conservation Appraisal (OCC) with the proposed site allocation:

Conservation Area Appraisal	Positive?	Comment
The greenery of the area is provided by a wealth of tall trees and other foliage, mostly in privately owned gardens.	✗	Loss of mature trees
Later infill development has largely been of a small scale and in-keeping with the village character of the area, or is otherwise discreetly placed to not intrude into views through it.	✗	Impossible on this plot of land.
The fragments of green fields within the conservation area contribute to the rural character of the village and provide a green setting with, hedges and hedgerow trees in views from roads and footpaths looking over to the rolling countryside of South Oxfordshire to the north.	✗	Will destroy views
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	✗	Ruskin Fields are part of these fields
Positive Chars		
Lack of significant intrusion from later infill development	✗	Significant intrusion
Green surroundings provided by mature trees and gardens	✗	Required removal of trees
Green and open spaces contribute to rural character and setting	✗	Will be lost by any development
Quality of views through the area Visual connection with the countryside	✗	Total destruction

Vulnerability		
Development that undermines the distinctive character or appearance of the area	✗	Will destroy Stoke Place, fields, views
Loss of green and leafy character through depletion of the mature tree stock and hedgerows	✗	As Above
Loss of rural character through depletion of green open space, roadside verges and hedgerows and views out to rural setting	✗	As Above
Biodiversity		
Spatial Analysis		
Much later 20th century development is inconspicuously located away from the main routes in small cul-de-sac developments.	✗	Will be very visible from Stoke Place
Small fields cut-off from the wider countryside by the ring road provide the rural setting of the village.	✗	Total Destruction As above
There are numerous significant views through, out of and into the conservation area which benefit from the framing of well defined street frontages, the focus on landmark buildings or grouped frontages, as well as vistas of formal parkland or out to the green setting.	✗	Total Destruction As Above
Rural Lanes		
These include interesting historic lanes with a rural character, such as Stoke Place, St Andrew's Lane and Larkin's Lane	✗	Stoke Place is the only green lane
These buildings take a variety of forms but their agricultural purpose is normally readily understood by the onlooker as a result of original features such as their barn or stable doors, distinctive window forms and absence of lighting to upper floors or attics. As such, they make an important contribution to the rural character of the conservation area.	✗	Light pollution from development would destroy area, total loss
Materials, Style and Features		
Green Fields		
The green spaces in this character area are important in views to the conservation area from outside its boundaries.	✗	Total destruction
The fields are enclosed by hedgerows of native tree varieties with occasional taller hedgerow trees, which provide an important wildlife resource, as well as providing structure and vertical interest in views.	✗	Hedgerows part destroyed
The lane follows a sinuous course with a series of views opening along its route.		Severely impacted

Oxford Preservation Trust manages some of these fields to preserve their contribution to the village's green setting.	✗	Will destroy OPTs efforts to retain rural setting of village.

OHCA - Significant View Lines Destroyed

The Old Headington Conservation Area Appraisal 2011 (OHCA) gave strong support to Ruskin Fields high conservation value and function within Old Headington.

The below is an extract from the OHCA Appraisal showing the significant view line (circled in purple below) at Ruskin Fields (Policy SPE14 and Ruskin Campus above (LP2036 SP56/054)

The immediate views from Stoke Place, are more important than the Elsfield view cone:

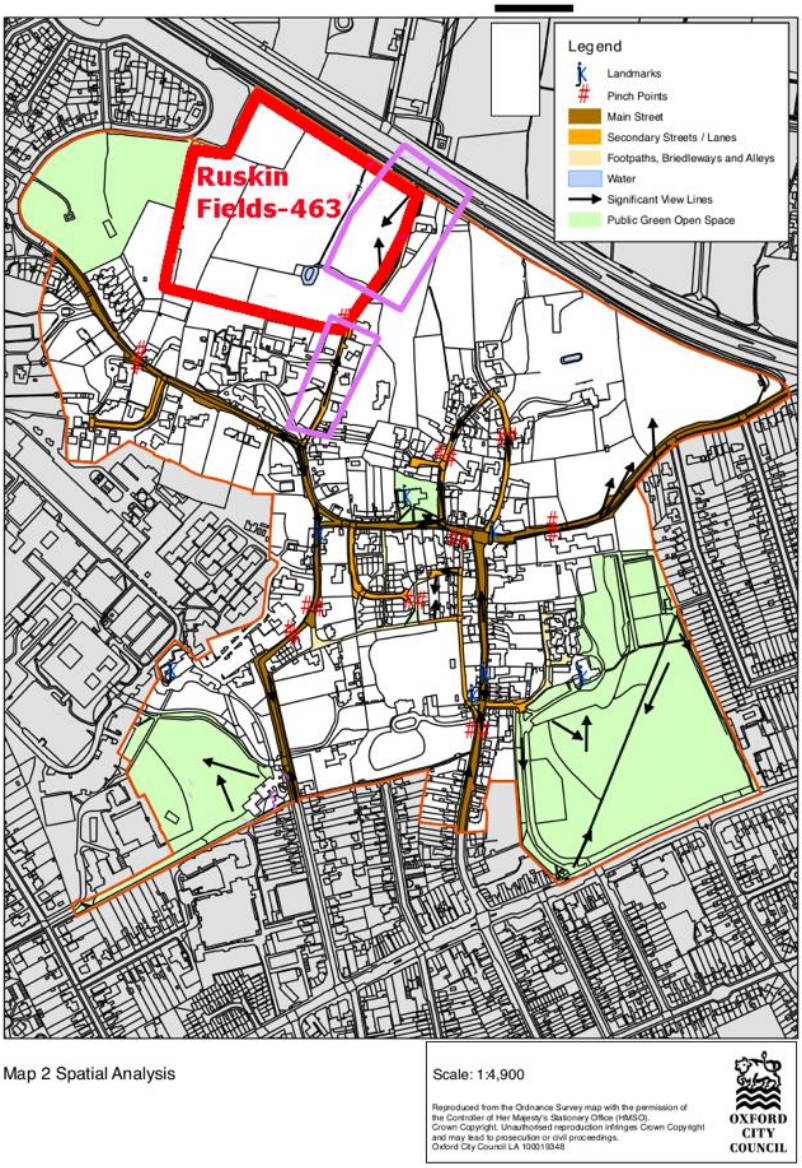

Fig: OHCA Map 2 SPE14/HELAA 463, and Purple Highlighted Significant View Lines

Ruskin Fields/SPE14 From A40 –Showing OHCA Significant View Lines and View from Elsfield

The treeline below is only an incomplete visual barrier, with houses set far back from the site clearly visible:

Development Site Looking South from A40 Gate, Site 56/054 has some cover, Not Rest of Fields (463/SPE14)

View from Stoke Place west across SPE14 – Ruskin Fields:

Fig: OLP2036 056/054 and SPE14 From Stoke Place Footpath Looking West From Path –should NOT have been consented

View From Elsfield View Cone

The view described below in 1928 still substantially exists:

"The high open ground at the top of the hill has proved an admirable site for suburban houses and public institutions, while much of the land not yet built upon is used for playing fields and nursery gardens. Scarcely separated from these modern developments, yet retaining a certain air of detachment, is the old village of Headington, which owes its seclusion partly to its distance of a quarter of a mile from the main road, and partly to its situation on the northern edge of the hill, with no roadway going beyond it. From the fields to the northward of Headington (ie from Barton/Barton Park/Elsfield), it is still possible to have an unspoiled view of the Church and the old houses of the village, set upon the wooded hillside."

So wrote Evangeline Evans in 1928 in her history "*The Manor of Headington*" and so it yet remains except for the Ruskin College building.

In the views to the conservation area from the higher ground north of the Bayswater Brook, the green open spaces in this character area form the setting of some of the village's listed buildings, including St Andrew's Church and Ruskin Hall. The green wedge of space that it creates in these views, running between the built-up Barton and Northway estates, illustrates the distinctiveness of the character of Old Headington from its surrounding communities.

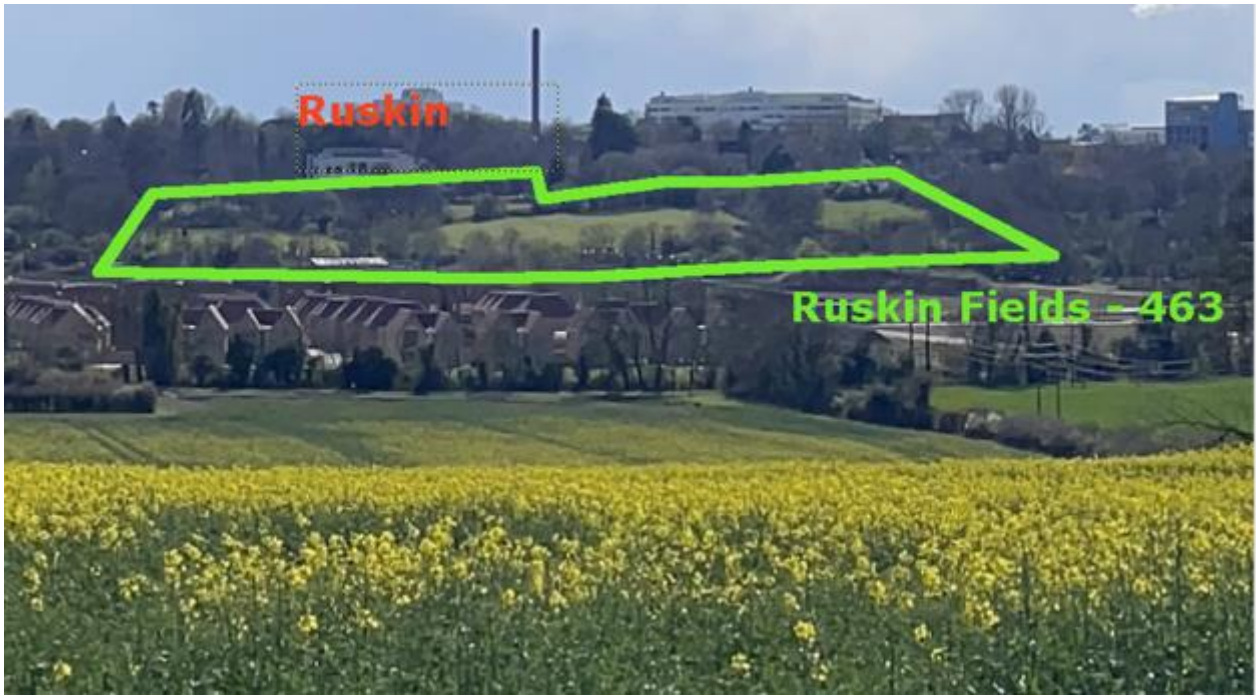

Fig: View from Elsfield (Future Land North of Bayswater Brook Development to SPE13/14) (Magnified)

Views Summary

Contrary to the following policies of the NPPF, It does not respect p.187 a. and b. of the NPPF *protecting and enhancing valued landscapes*

And:

recognising the intrinsic character and beauty of the countryside, p.96, and p.97 (access to open spaces)

Stoke Place – The Last Rural Footway in Old Headington

The key extract from the OHCA report is:

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. On the east side of the path a denser screen of foliage encloses the lane, with a small ruined farm building lying in the undergrowth. ***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 path also benefits from greenery of the verge, which includes carpets of flowers of wild garlic, as well as bluebells in late spring. The rural character of the path was highlighted in 29 responses (46 % of the total number) to public consultation on the draft appraisal, which highlighted the rural quality of the bridleway as a key feature of the conservation area.*

Fig: Stoke Place – At 463 Development Site (left) Looking North This is NOT Accessible by Car

Fig: Stoke Place Looking South From Near A40, Policy SPE14 on Right

Stoke Place is the last accessible green way through a rural setting running for only 180 metres, which is or will be severely damaged by:

- Any new access to Ruskin Campus (SPE18) or Ruskin Fields (463) by "improvements" to the surface
- Tree thinning or access for access to 463 development site

The fundamental point about this is that it is the only accessible place in the city where residents can enjoy a rural experience of great beauty, the surrounding land at Elsfield is by contrast sterile and featureless.

Fig: Northern End of Stoke Place to A40 – Width Is Far Too Little Without Major Rework

Green Space, Green Belt and Incorrect Designation

Green Space - Core v. Supporting

Ruskin Fields are marked as "Supporting" Green Infrastructure although they meet all the criteria for Core Green Infrastructure as per the definition in OLP2045 as:

- They create a wildlife corridor through a heavily urbanised area from the Barton Triangle, Larkins Lane reserve and fields across Stoke Place, to Dunstan Park
- Provide flood storage, protecting Barton Park and downstream Oxford
- They are part of the Old Headington Conservation Area
- Can not be easily moved elsewhere
- Have strong local value as the only fragment of countryside left on the city side of the A40 Ring Road

Fig: Ruskin Fields as Green Corridor between Dunstan Park and Larkin's Lane and other GI

Green Space – The *"Green Belt"*

The "green belt" around Old Headington fulfils a function both as retaining the morphology of the village and the functions of a "green belt":

Fig: The "Green Belt" around "The Village in a City" – Old Headington

Hydrology, Fen, Peat Reserves, and Flooding

Substantial peat reserves and alluvial activity is indicated from the BGS map below, indicating hydrological activity and presence of peat at Ruskin Fields and adjacent. A seepage line exists as shown at 85m, mirroring the Lye Valley and Headington Hill.

Requests for survey have been denied:

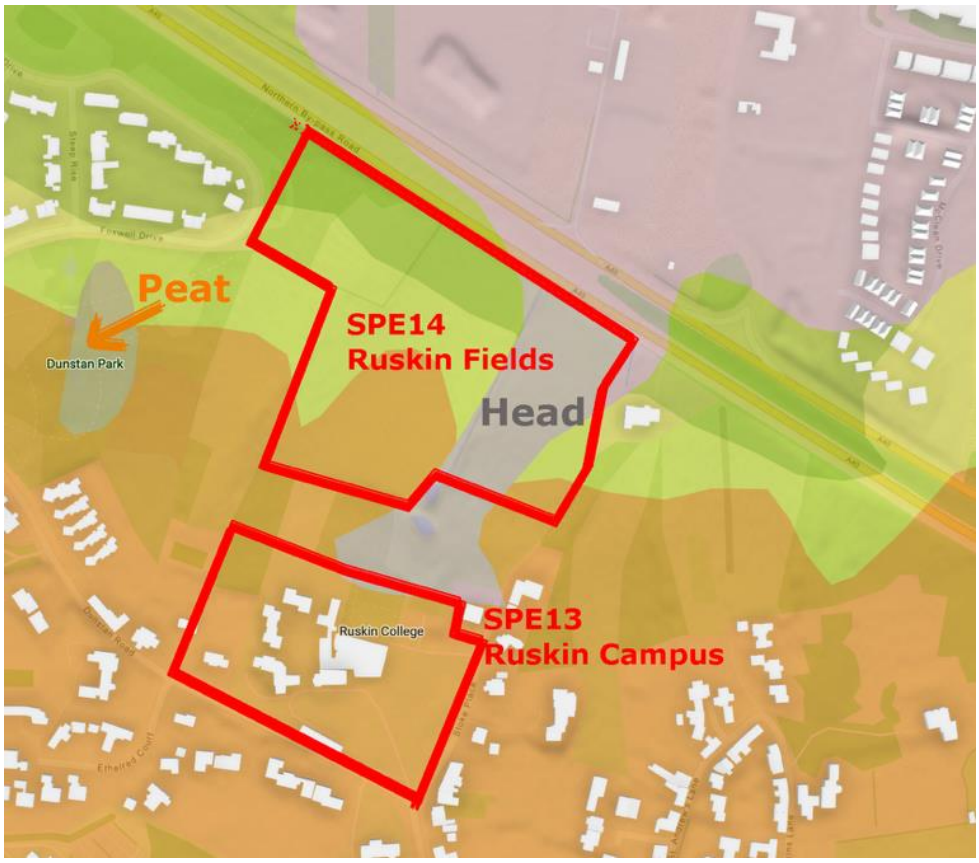

Fig: BGS (annotated) showing sediment and flows

The Head above shows a clear stream to Barton Park and Bayswater Brook. Peat is recorded at Dunstan Park officially and as below.

Head *is poorly sorted and poorly stratified, angular rock debris and/or clayey hillwash and soil creep, mantling a hillslope and deposited by solifluction and gelifluction processes. Solifluction is the slow viscous downslope flow of waterlogged soil and other unsorted and unsaturated superficial deposits*

Peat-Peat*. These sedimentary deposits are lacustrine and palustrine in origin. They comprise accumulated (and detrital) organic material, forming beds and lenses within lagoons, bogs and swamps.*

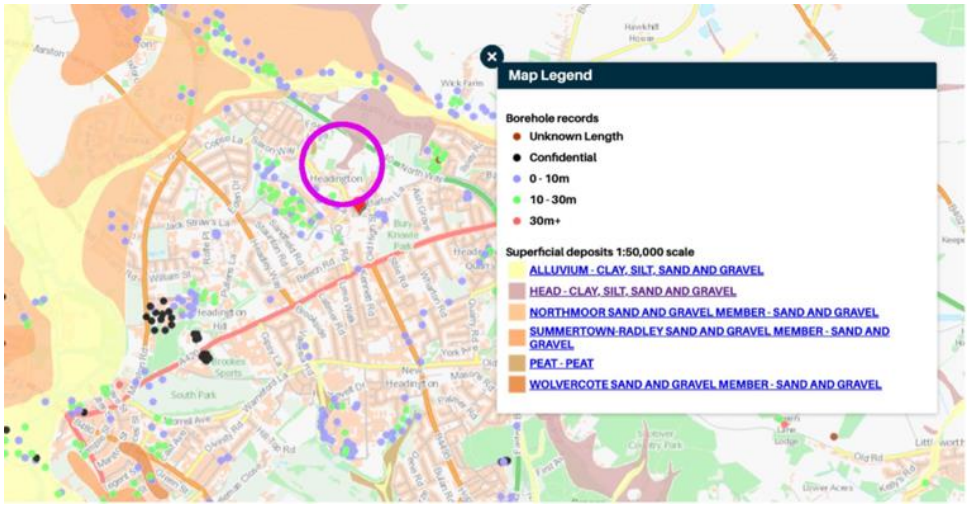

Fig: BGS – Former Riverbed shown Running Across SPE14 and SPE13 Indicating Calcareous Hydrology

The following map has been updated to show the known peat at Dunstan Park, and 6 Dunstan Road rear garden, and at the OPT Larkin's Lane reserve. Peat is strongly suspected at on Ruskin Field. It is highly probable peat extends to the "Wet Field" marked below which is part of Ruskin Field and the access road location:

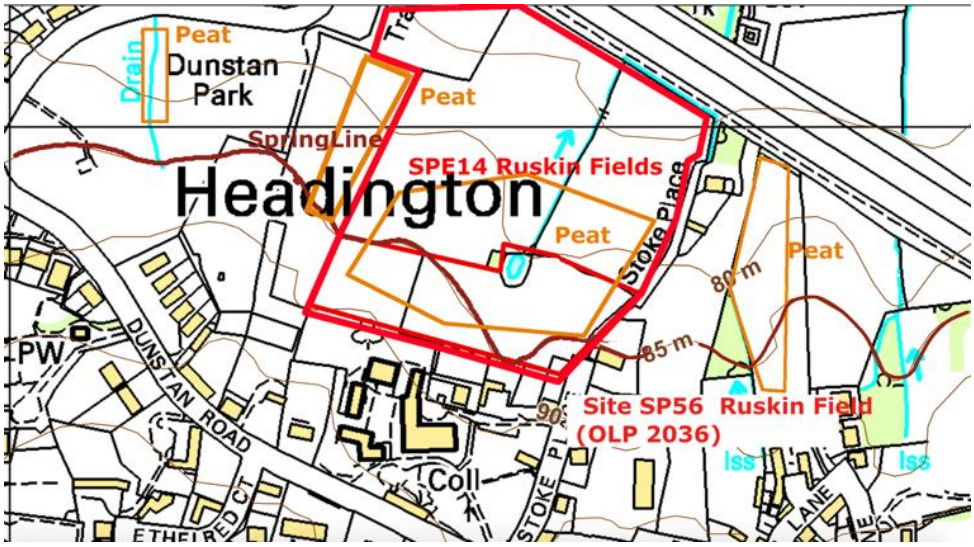

Fig: Headington Hill Calcareous Springline (Brown), Peat, and Flows

Please refer also to the representation by Judy Webb.

The southward dip of the 85m contour line (above) between the Crinkle-Crankle wall and Stoke Place correlates to the former riverbed and possible peat and fen and the modern surface, indicating development would NOT be possible close to Stoke Place.

The Lidar map is shown below:

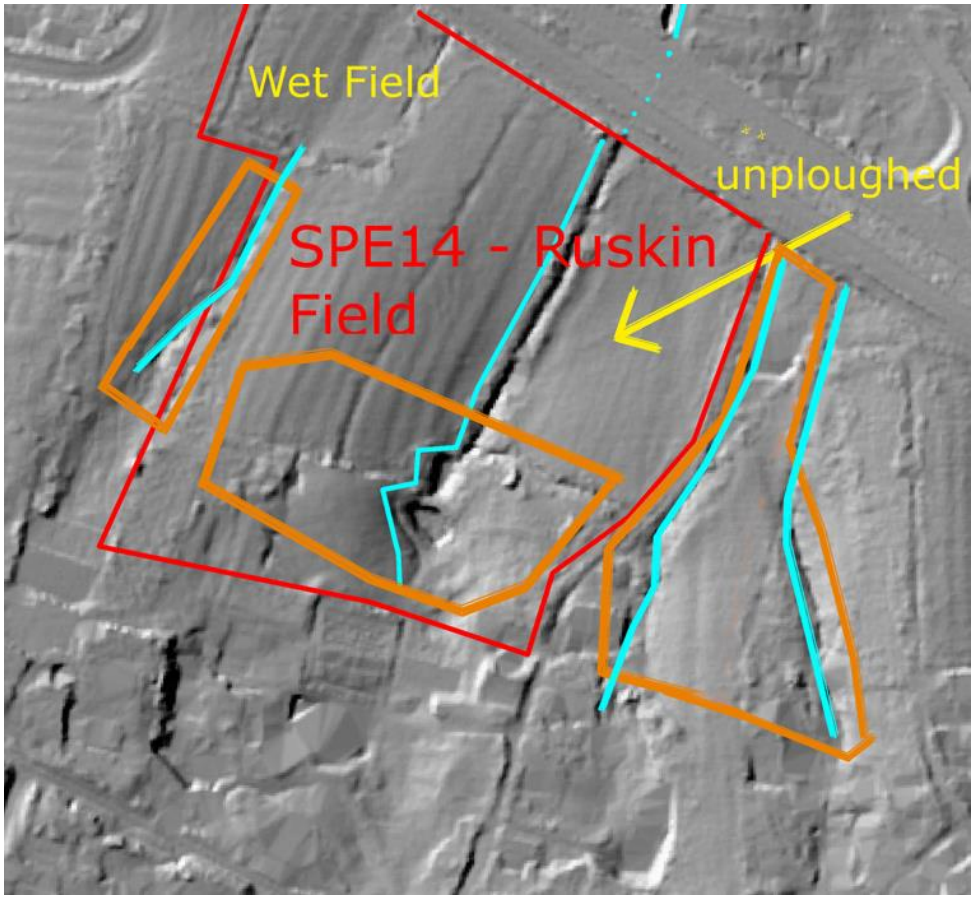

Fig – Peat, Fen and Flows

FLOODING

The vulnerable and foolish floodplain Barton Park development is located immediately to the north, downslope of OLP2036 SP55/SP56 (054) and Ruskin Field - SPE14 but this is not addressed in the policy.

More widely, the cumulative increase in runoff from this development, LNBB, Sandhills to Barton Park, and then via Bayswater Brook, the Cherwell to Oxford is unsustainable:

Fig: Stoke Place after a downpour flowing to Barton Park

The wider risk to Oxford is shown here with multiple developments flowing into Bayswater Brook:

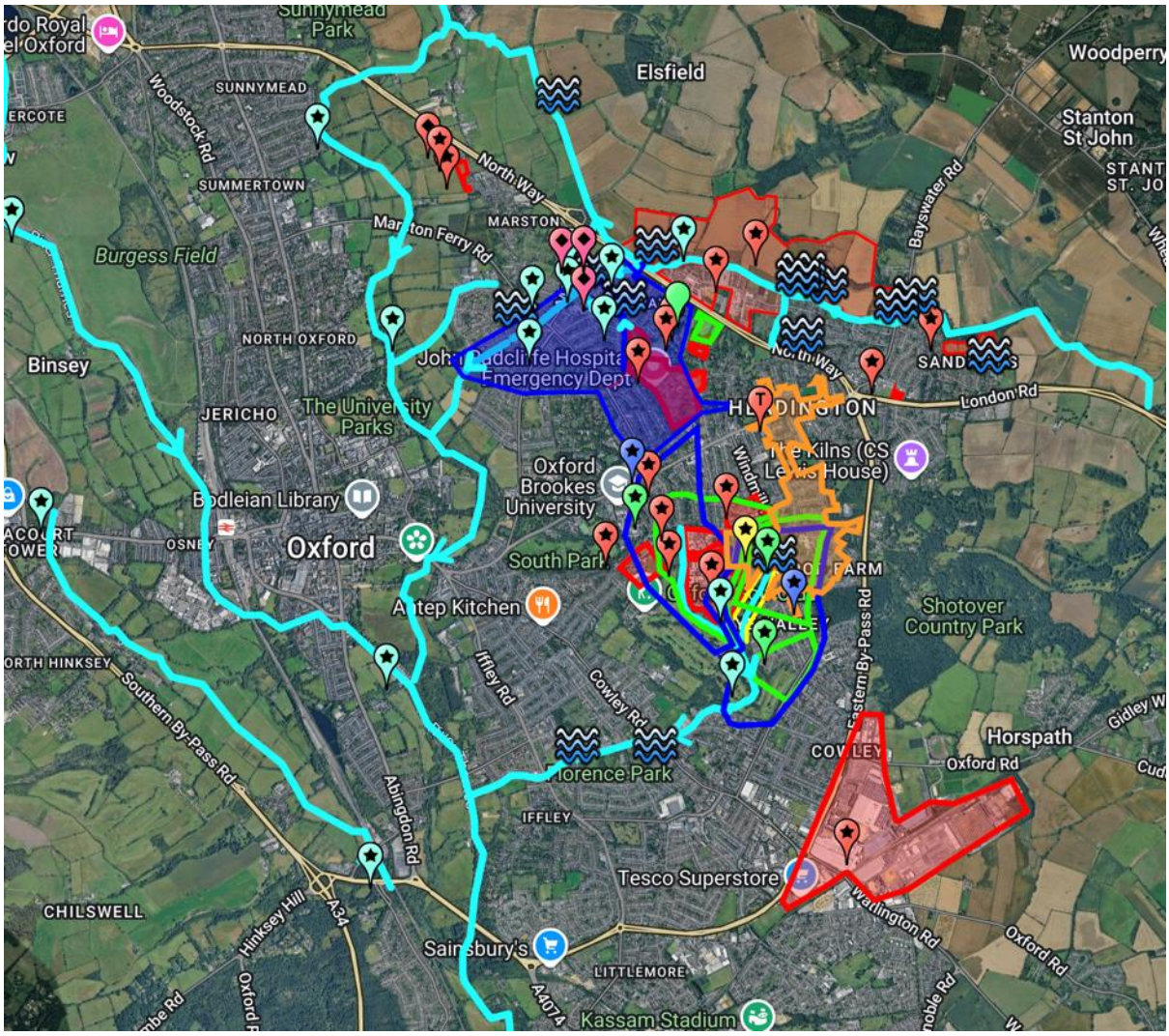

Fig: Ruskin Fields and Flood Risk – The Wider Context – Flooding at Bayswater Brook and to Oxford

Planning Inspector's and Sustainability Reports

Ruskin Fields - Rejected Site – Inspector's Report (2012-3)

In the final Inspector's report (Site DPD report on the examination into sites and housing local plan (Report to Oxford City Council by Shelagh Bussey MA DipTP DipEM PhD MRTPI) declared development **OF THE ENTIRE SITE** **unsound**.

The development of Ruskin Fields was firmly rejected during the Core Strategy/Barton AAP Review by both the Council, both Labour and Lib Dem Groups and by the HELAA 2016:

"Whole site is unsuitable as development would cause unacceptable harm to the Old Headington Conservation Areas justified by the Barton AAP Inspector in Nov 2012. A proportion of the site would additionally be unavailable as it is owned by Oxford Preservation Trust"

As per the Inspector's Report, Report to Oxford City Council by Shelagh Bussey MA, Dip TP, DIP EM, PhD, MRTPI an Inspector appointed by the Secretary of State for Communities and Local Government:

Date: 14th 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.***

And further regarding the rerun Sustainability Appraisal for Ruskin Fields:

137.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, open space provision and improvements to pedestrian and cycle links. Consequently, I further conclude that the Option 3 proposal was correctly rejected for heritage and delivery reasons.***

The material considerations that militate against development are now greater due to the adjacent development of the green space deprived Barton Park (See Green Space above)

The logic of any Ruskin Fields development is simple – a small development will do disproportionate damage and have no effect on the housing shortage, a large development will be catastrophic.

Ruskin Fields – Barton AAP – Inspector's Report (2012-3)

Issue 1 – An Overview of the Soundness of the AAP

Whether the scope, boundary and content of the AAP are sound and will enable its Spatial Vision and Objectives to be achieved.

17. The evolution of the AAP is clearly based upon the testing of feasible options in order to find the most appropriate policy solutions. The Preferred Options document [CD1.5] sets out the range of options that have been tested and the SA [CD1.10] makes explicit why some were rejected and others were carried forward to the proposed submission stage. The SA process is generally satisfactory, except for its appraisal of a residential proposal for land at Ruskin Fields within the Old Headington Conservation Area. This proposal was first put forward in response to the Council's call for sites for the separate Sites and Housing Plan and possible links to the AAP. It was carried forward to the Preferred Options stage of the AAP and was SA tested. As a consequence of the conclusions of that SA it was not carried forward to the submission plan.

18.However, it is not clear from the SA process that all of the most up-to-date evidence submitted by the promoters of the Ruskin Fields site was taken into account. Consequently, it is unclear if the Council's decision not to carry the proposal forward in the AAP is based upon robust evidence and transparent reasons. To rectify this weakness in the SA process, the SA of the Ruskin Fields site was re-run and subjected to public consultation during the examination period [CD7.23]. Several suggested schemes have been submitted for

residential development, including 50% affordable housing, and provision for public open space at Ruskin Fields, all of which fall within the two options that were re-assessed in the addendum SA. The larger option assessed is for between 175-193 dwellings and smaller is for around 70 homes.

19. Consideration of these options at the hearings sessions was deferred until after the completion of the further SA work and consideration of the public consultation comments upon it at a meeting of the full Council on 20 September 2012.

Oxford City Council Barton Area Action Plan Local Plan, Inspector's Report November 2012

20. *The scoring of the two options against some of the SA objectives has been challenged. I agree that the significantly negative score given for both options in respect of SA objective 13: to conserve and enhance Oxford's biodiversity, is not supported by the evidence, which indicates that both options, particularly the smaller, would have a less damaging impact than that indicated in the SA.* ***However, I consider that all of the other SA objectives have been scored appropriately and, for the reasons that I give below, the decision to reject the option of development at Ruskin Fields remains sound.***

21. I conclude that the SA has been made demonstrably robust by the additional testing of the two main options for proposed development at Ruskin Fields, that all feasible options have been properly tested and that the reasons why some options have been rejected have been clearly stated.

22. Although it is not the perception of all representors, public consultation throughout the preparation of the AAP has been carried out in accordance with the Statement of Community Involvement (SCI) [5.14 a & b]. The Council has clearly put significant and innovative effort into engaging the local and wider communities, and hard to reach groups. It is clear that their views, together with the SA and democratic role of the elected Council Members have influenced the evolution of the AAP's policies and proposals.

Sustainability Appraisal (July 2012)

The rejected site is shown below as indicated in the Sustainability Appraisal run as part of the site assessment, which was rerun at the request of the Inspector.

Source: Site Assessment (including Sustainability Appraisal) July 2012,

Addendum to the Sustainability Appraisal for the Sites and Housing Plan, July 2012

Site Reference	463	Site Location Plan:
Site Name	Ruskin Field	
Ward	Headington	
Site Size	4.5ha	
Existing Use	Green open space, college fields	
Landowner(s)	Ruskin College	
Relevant Planning History	None	
Source	Call for sites 2016	

Figure: Ruskin Fields Rejected Site

This site is Greenfield. It is accessible by public transport and has some local services nearby. There are three options for this site:

Option 1 (non-allocation of the site) would not lead to the provision of affordable housing or the opening up of the site to public access. However it would protect the views into and out of the Old Headington Conservation Area and protect the biodiversity of the site.

Option 2 (allocate for 150-193 dwellings): This option would promote the efficient use of the site. It would be likely to deliver 50% affordable housing, and could also deliver some public open space. However it would have significant effects on the Old Headington Conservation Area and the biodiversity of the site. The site is not particularly well connected to local services, and would offer no new services.

Option 3: (allocate for 69-70 dwellings): This option would result in lower levels of housing and affordable housing, but larger amounts of publicly accessible open space. It would have the same limitations as Option 2 in terms of the conservation area, biodiversity and access to / provision of local services.

Option 1 is therefore the preferred option.

Site DPD 2012

As there has been no material change to the relevant planning policies, the original judgement that no development should be allowed on Ruskin Fields 463 site stands.

Therefore, there can be no change to original assessment.

A copy of the report is provided as an Appendix below.

Whereas the green surround of the Old Headington "Village in a City" is not formally green belt, it fulfils all those functions, this development would result in the loss of a prominent part of the "green belt" surrounding Old Headington as articulated in this finds support in NPPF (Chap 13, p.133,p.134) where Ruskin Fields and the Old Headington green fringe fulfils four out of five of the purposes of the green belt:

- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns;

Oxford Preservation Trust owns the Barton Triangle field, and has recently acquired Larkin's Field in recognition of its importance:

Car Free Development

The site is currently more than 400m (Policy C8) from frequent public transport so car parking would be permitted at minimum standards.

The policy is not ***justified*** without a ban on car parking as this would make the site highly visible and discordant with the OHCA, and waste space better used for housing.

Policy SPE13 – Ruskin Campus

All of above objections pertain to Ruskin Campus/Field, additional comments are made below.

The policy is ***ineffective*** as it assumes one big development, this would not apply to say, a moderate extension to an existing building. It is unclear if residential development must be linked to academic uses.

Ruskin Campus – SPE13 - Significant Harm to OHCA

The site has an ancient orchard to the west, the Crinkle-Crankle Wall, Ruskin College (both Listed) in the centre, and is on calcareous springline (brown), and heavily sloped. (below)

Any development to the immediate west of Stoke Place will severely impact on the bridleway and views across to Elsfield, therefore there is NO part of the site that is deliverable, therefore the site allocation is ***unjustified*** and ***undeliverable***.

Response By

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OXFORD LOCAL PLAN 2045 – Lye Valley

Lye Valley SSSI - Hydrogeological Impact Assessment Report Response

Headington Heritage
Saving Headington's Heritage
A Personal Blog

https://headingtonheritage.wordpress.com

This is part 3 of Headington Heritage response OLP2045 Plan Part 1 addresses the Plan in general, the Ruskin Campus and Field response. (Part 2) and Lye Valley, and Lye Valley Hydrogeological Impact Assessment report (Part 3) (This response)

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Summary

I wish to represent and participate in all Planning Enquiry sessions addressing policies below.

Any policy in the Local Plan which is reliant on this report is unjustified and ineffective as the analysis and conclusions are simply incorrect.

An extremely disappointing report full of basic errors with meaningful guidance entirely absent.

Shows a very poor understanding of the Lye Valley and have clearly not grasped even the basic issues or proposed any meaningful solutions:

- Total absence of analysis or specific guidance concerning the very large development sites at Old Road Campus or the vast runoff from the impermeable areas at the Churchill and the design, capacity and proposals for its sewers and infiltration tanks with proposed mitigations, this is basic, not for Reg 19 stage.
- The Surface water map on Fig 3-16 does even mark the private drains of the sites above, which renders any conclusions meaningless as the base data is not available
- Only small sites are addressed as they are "*the majority*" (numerically only), although large development has greater impact, due to size, and nearer to the SSSI units.
- The existing flooding and incision of the Lye is caused by domestic and street drainage so instead of recommending an urgent reduction in impermeable areas of the catchment and mitigation measures, it is proposed small scale development is screened (excluded) from any test based on wholly incorrect assumptions and calculations which they increase impermeable area by 0.2%
- NPPF p.181only states "reduce" ie from the projected increase the flow, and Building Regs Part H state "adequate soakaway" SuDs, neither demands an overall reduction from the original state, this is not acceptable in the Lye surfacewater catchment although the recommended approach in the Report
- A failure to appreciate that Environment Agency flood maps DO NOT know about the Thames Water sewer flowing along The Slade to the head of the Lye and therefore are incorrect (Report, Fig 3-18), multiple floods have occurred in the Lye from this source, which are not discussed
- No recognition that Thames Water sewer ingress to the SSSI is ALREADY excessive and damaging therefore ANY increase is unacceptable as a starting point
- No guidance or examination of existing defects in Thames Water foul or surface water sewers their artificial catchment, management nor recommendations for improvements
- A concentration of the size of the catchments rather than the more important issue, the effects of sewers converting rainwater to sewer water delivered in minutes to the outfalls, and preventing ground infiltration
- No differentiation at all between the type and degree of risk to the Lye SSSI posed by development in one catchment versus another, each of which has its own risk profile
- No attempt to calculate and map the overall water table from the many sources available, although critical to understanding groundwater
- No acknowledgement that both fens are extremely small in area, and prone to complete destruction from a sufficiently large catastrophic event such a prolonged drought or severe flood
- Almost all the recommendations of the Lamberth report have been ignored, in particular that NO development should occur in the Groundwater catchments

- The Upper Lye Valley, crucial to reducing surface flows is entirely ignored, although clearly marked on surface water flow maps (this is what would have been with TW sewer on The Slade)
- Statement that the SSSI is "*coping well*" with reduced groundwater, based solely on the fact a small portion has survived, and very flimsy, short term evidence while ignoring that given by Lamberth and the Report itself, with no regard to climate change
- Having quoted Lamberth extensively, then proceeds to ignore each and every one of his key observations and recommendations, or even listing them.
- The assessment areas and tests on Table 7.1 is pointless as that is the existing situation and has no detail as to any special considerations for the Lye
- Perhaps unsurprisingly, very little supporting evidence or calculation is given for the definition of the catchment areas which vary very substantially from Lamberth who used direct primary evidence to define his.
- General assumption that groundwater flows are based on surface levels, not strata, although this is partially covered, the surface level seems to be, incorrectly, the main indicator of flow.
- Tests are pointless unless Article 4 directions block permitted development rights
- Extraordinary that a hydrology report would not map all the springs and wells to present a complete picture
- An apparent attempt to exculpate the Council for its foolish decision to build on the tipped embankment at Warren Crescent, although the seepage line is shown (Fig 3-39)
- Appears to have been written by, and for, developers, ignoring evidence

General Observations

There is far too much extraneous and tangential material which appears to have placed simply to fill the report with largely irrelevant research from other sources, the report is mostly a cut and paste from existing information[1] The purpose of the report was to examine the evidence in totality, little of this is in evidence and on crucial issues, wrong.

Worse it is misleading, downplaying the dangers to the SSSI.

If the Council were actually interested in facts, it would have approached the FOLV and me for comment rather than release a report marked "final" prior to the end of even the formal consultation.

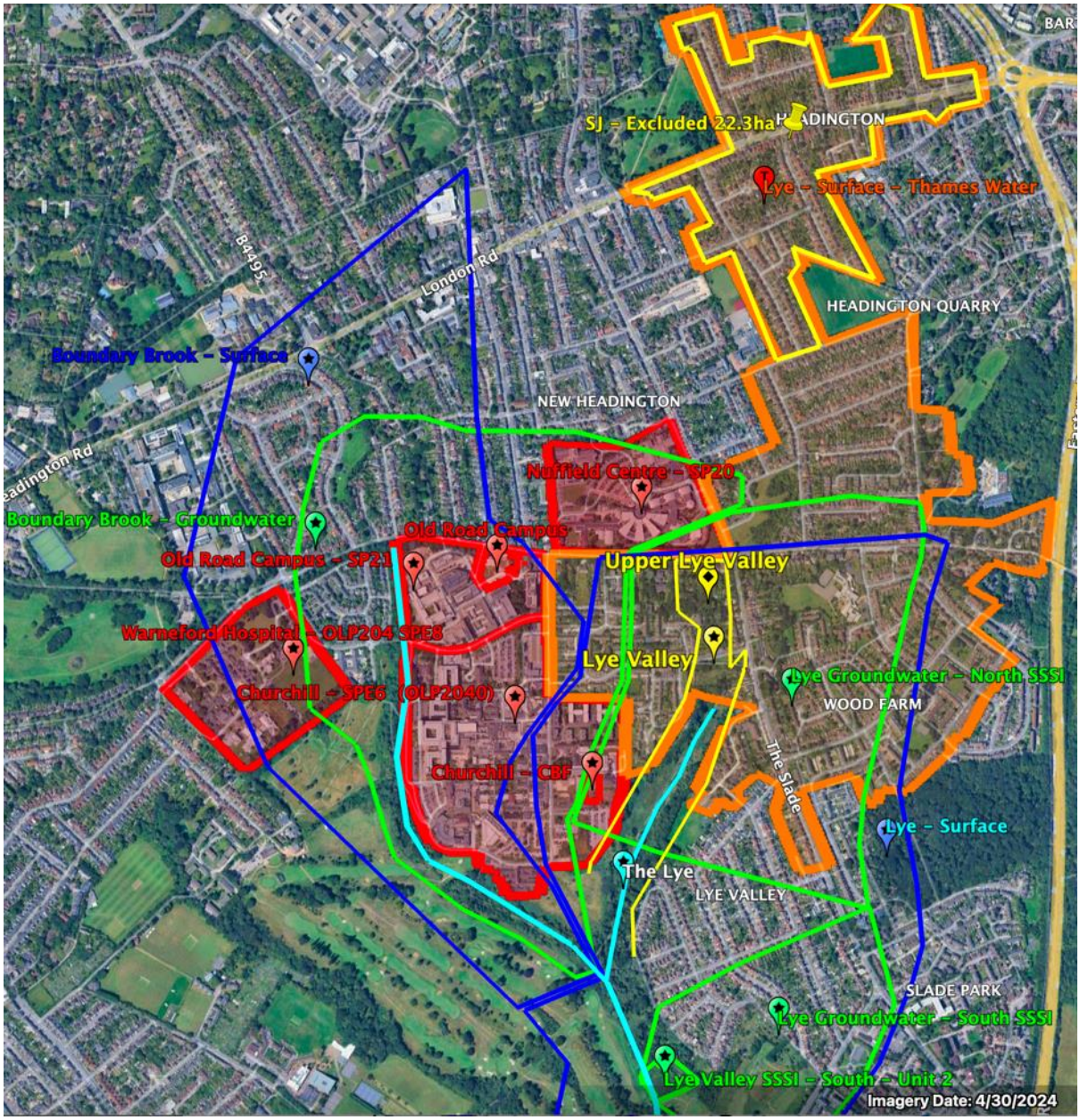
Subsequent to the formal consultation as part of the failed LP2042, the Council have now used PRECISELY the same report with no emendments or corrections despite negative feedback in the Reg 18 phase including this response.

*[1] Which includes material from my Headington Heritage website in violation of its Creative Commons CC BY-NC-SA 3.0 (**NC**=Non Commercial use only)*

Master Map

In the following maps, red are large development sites, green is groundwater catchments, blue is surfacewater catchments and orange is the largest Thames Water artificial catchment. The yellow "SJ excluded" catchment marked is discussed below.

The Upper Lye Valley and Lye are outlined in Yellow.



Master Map: Catchments and Development Sites Near the Lye Valley (After Lamberth, OLP 2045)

Catchments - General

The catchments defined vary substantially from Lamberth, apparently as the Report believes surface topology to be determinate with strata declination secondary, when in many cases, it is very probably the other way around as understood by Lamberth.

The Report statement below flies in the face of all evidence:

The fact that Lye Valley continues to support a range of rare species and habitats despite all the changes to the catchment that have occurred suggests that some features of the site are relatively robust and insensitive to change. (Report, p.89)

That there are some survivals from the:

- Loss of fen area due to catchment changes
- Reduction in flows
- Flooding reducing streambed heights and so draining groundwater and incising streams and destroying sections of fen
- Reintroduction of many of these species with intensive land management

Does not indicate the habitat is robust, simply some has survived.

This study has shown that development on the northeastern part of Southfield Golf Course West would have a moderate effect on the hydrology of the riparian corridor of Boundary Brook SLINC in terms of surface water runoff and groundwater recharge. (Lamberth, p.4)

Yet nowhere in the entire report is there a discussion of the vast hospital sites which drain and have the same hydrological relationship to the South Fen as Southfield Golf Course West. Even the balancing pond at the head of Boundary Brook is mentioned only in passing. What would be expected is full analysis of its capacity versus intended developments at the Churchill.

In Report, 6.2.2 it states:

Section 4.4.1.1 outlines that monitoring has shown that groundwater inputs into the SSSI continue to create saturated conditions through the year and that despite the urbanisation of the catchment, recharge to the aquifer appears to be sufficient to support the wetland and the scale of urbanisation in the catchment to date does not appear to have caused a significant change to general recharge (see Section 4.4.1.1).

In the case of the South Fen, Lamberth points out there has been a *"has been a gradual drying up of the springs that feed the fen* with loss of groundwater starting in 1922 with the formation of the Lye Valley/Peat Moors Estate.

This study has concluded that the size of the groundwater catchment areas of the Lye Valley and Boundary Brooks have been reduced considerably by the surrounding urban developments. The groundwater catchment for Lye Valley North SSSI is considerably larger than that of the South SSSI. Therefore, it is very important that the size of the groundwater catchment zone for the South fen is not reduced especially in the light of predicted UK climate changes over the next 30 to 50 years. (Lamberth, p.4)

The water level monitoring shows that groundwater supplies to the SSSI continue to create saturated conditions through the year (Report, 4.4.4.1) to be sufficient to support the wetland.

Significantly low groundwater levels have been recorded for example in April 2022.

Urbanisation has the potential to affect recharge through increased impermeable surfaces in the catchment. However in this instance, catchment development does not appear to have caused a change in recharge significant enough to affect the supply to the wetlands. (Report)

Is clearly untrue as large portions of these two very small sites have been lost in the past by floods described below, and the earlier Bullingdon Bog has entirely disappeared, as have many areas drowned in the tipped embankment below Warren Crescent, the allotment area, and the east side of the valley.

There is no discussion of climate change as estimated by Lamberth:

Data from the UKCIP program using the medium high emission scenario indicate climate change driven precipitation changes will cause an annual 10% reduction in rainfall by 2020. Summer rainfall will be 30% down by 2050 and 40 to 50% down by 2080 (UKCIP, 2002). The consequences of a changing rainfall pattern to the health of the fen areas and spring zones is difficult to estimate. With a lower summer rainfall, fen water levels in summer will drop to a greater extent allowing the invasion of plants that prefer drier conditions. (Lamberth, p.34)

Urbanisation DOES affect recharge, there is no potential element, this is clearly indicated.

Regrettably, this monitoring was not done for the Lye, but the comparison with the stream near Wick Copse and Boundary Brook concluded that very substantial groundwater had been lost and in effect converted to sewer water: (0.76/0.26) (Report, p.16)

This suggests that baseflow/groundwater inputs into Boundary Brook maybe around three times less than they were before urbanisation. (Report, p.16)

Surface Catchments

There is no differentiation in the report between one Thames Water sewer catchment and another in terms of the dangers posed to the Lye, or for any other catchment. Different catchments have different risk profiles, mitigations and treatments, all of which are ignored.

The large Thames Water catchments discharging at the head of the Lye valley have caused and are causing serious damage to the North Fen, the catchments discharging further down the Lye or into the head of Boundary Brook do less damage, mainly to the South Fen where scouring, incision and lowering of the water levels are also serious issues.

Whether the Report's claim that the "*Modified Catchment*" area increase only marginal is true or not (Report p.26) is missing the point. Flows from every gutter, road, driveway and roof arrives at the head of the Lye Valley in minutes via the Thames Water sewer system, especially in storm conditions.

Therefore, it is very important that the size of the groundwater catchment zone is not reduced and that run-off from the urban catchment is diverted away from the Lye and Boundary Brooks. (Lamberth, p.34)

In the natural state, the rain in the surfacewater catchment would either soak into the ground and appear months later at the Lye, flow very slowly through moorland, or evaporate:

It is not the catchment size but the flow that is critical.

Planning Guidance Section

Groundwater Protection Zones

The guidance section (Section 6) is silent on whether development in Groundwater protection zones should be banned as recommended by Lamberth:

This is similar to the methodology used by the Environment Agency but applied locally to protect specific natural areas. An area has been defined using the groundwater flow model to protect the SLINC and SSSIs contained within the riparian corridor of the Lye and Boundary Brooks. Figure 5 shows the groundwater protection zone for the area.(Lamberth, p.4)

Groundwater protection zones are not fully mitigated by the use of SUDS therefore development within these areas must be restricted or eliminated. (Lamberth p.39)

That this is not even discussed is a major failing of the report.

Large developments

The Churchill Hospital (SHLAA 12), Nuffield Hospital (SHLAA 42) and Old Road Campus (SHLAA 43) and the Warneford Hospital (63) are Allocated Sites in Oxford Local Plan 2045 sites (see Master Map) have very major developments planned which will negatively impact on the SSSI and downstream areas such as Cowley Marsh.

The location of these sites in the Lye SSSI catchments is shown below:

Site	SHLAA Site	Groundwater?	Surface Water?	Thames Water (Orange, N of Lye as marked)
Churchill Hospital	12	NF - Partial	NF - Partial	Outfall to BB infiltration tank
Nuffield Hospital	42	NF-Partial BB-Partial	NF Outfall to head of Valley	See Fig 3-16 not orange catchment
Old Road Campus	43	BB	BB - Most	BB Outfall
Warneford Hospital	63	BB-Partial	BB - Partial	BB Outfall

NF=North Fen Unit, BB=Boundary Brook (flows to South Fen)

NONE of the above very substantial sewer systems are marked on Figure 3-16, and are not calculated or considered, it is not sufficient to push this off to Reg 19.

The statement that "*The majority of planning applications in the study area that have occurred in the last 10 years within the catchment have been small in scale.*" may be technically correct, but the most damaging applications have been multiple, vast developments at the Hospitals including the recent Clinical Biomanufacturing Facility (23/02262/FUL) a huge building covering a large surface area in the ground water catchment of the North Fen ,and at Old Road Campus with the construction of nine large buildings (*12/02072/OUT)* each with a football field-sized multi-floored basement at Old Road Campus upstream of the South Fen which will cumulatively damage both the groundwater and surfacewater hydrology of the SSSI and increased downstream flooding.

The specific issues at the large allocated sites are not addressed at all, apparently simply as they are numerically few, a lazy assumption.

These are the most dangerous to the Lye hydrology with a very strong prospect of further development in the near future.

That this is not even discussed or understood is a major failing of the report.

Impact of Small Scale Developments on the Surface Water System

The key statements (Report Table 6.3, Section 6.3.1), on which the Planning Guidance to exclude small scale development from tests is based, are absurd:

The modified surface water catchment is circa 3,900,000m2 and a minor householder development is typically <50m2 in size. This equates to 0.000013% of the catchment (Report, Table 6.3)

And:

*On cumulative impacts, a review of planning applications since 2018 has shown that there were around **three** small scale development applications per year in the study area in that time (see Appendix D). Based on that rate, if all were a maximum typical size of 50m2, then in fifty years' time, small scale developments would occupy an additional **0.2%** of the Lye Valley SSSI catchment (Report, p.108)*

This is a ridiculous statement and entirely incorrect as:

- The ***impermeable*** part of the catchment is the main source of runoff, therefore its increase, not that of the overall catchment, is the only metric
- Even within a small, residential subarea "SJC" of the catchment described below, 21.8 applications p.a. were recorded which exceed the three above by an order of magnitude

Runoff contributing to flooding and scouring in the Lye Valley SSSI is caused primarily by impermeable surfaces such as buildings, drives and roads, so the ONLY metric is the IMPERMEABLE component of the catchment area.

SJC Application Tracking and Results

In this section, a calculation is performed of the ACTUAL number of planning applications and the consequent growth of the IMPERMEABLE part of the catchment using data collected by "SJ" in the SJC catchment.

The results are then extrapolated to the entire catchment.

The Impermeable/Permeable Area Calculation

The Thames Water catchment is given below, the area proportions are representative of the residential part of the North Fen catchment only, excluding the Churchill Hospital and the impermeable industrial sites to the west:

Table 5-1 Subcatchment Areas and Information for Storm Drainage Assessment

Descriptor	Total Area (ha)	Permeable Area (ha)	Impermeable Area (ha)	Area 1 - Paved Area (ha)	Area 2 - Roof Area (ha)
Main Outfall	78.488	49.08	29.408	16.815	12.593
Outfall 1	11.793	7.376	4.417	2.729	1.688
Outfall 2	1.816	1.104	0.712	0.384	0.328
Total	**92.097**	**57.56**	**34.537**	**19.928**	**14.609**
Percentage	-	62.5%	37.5%	21.6%	15.9%

The total contributing area is 92.1 hectares, of which 62.5% is permeable and 37.5% comprises impermeable areas (34.5 ha). The impermeable areas consist of paved areas and roads (19.9 ha) and roof areas (14.6 ha).

The report estimates the entire catchment area 3,900,000 sqm or 390ha

The percentages of permeable (62.5%) and impermeable (37.5%) area are used below.

SJC Catchment Tracking Described

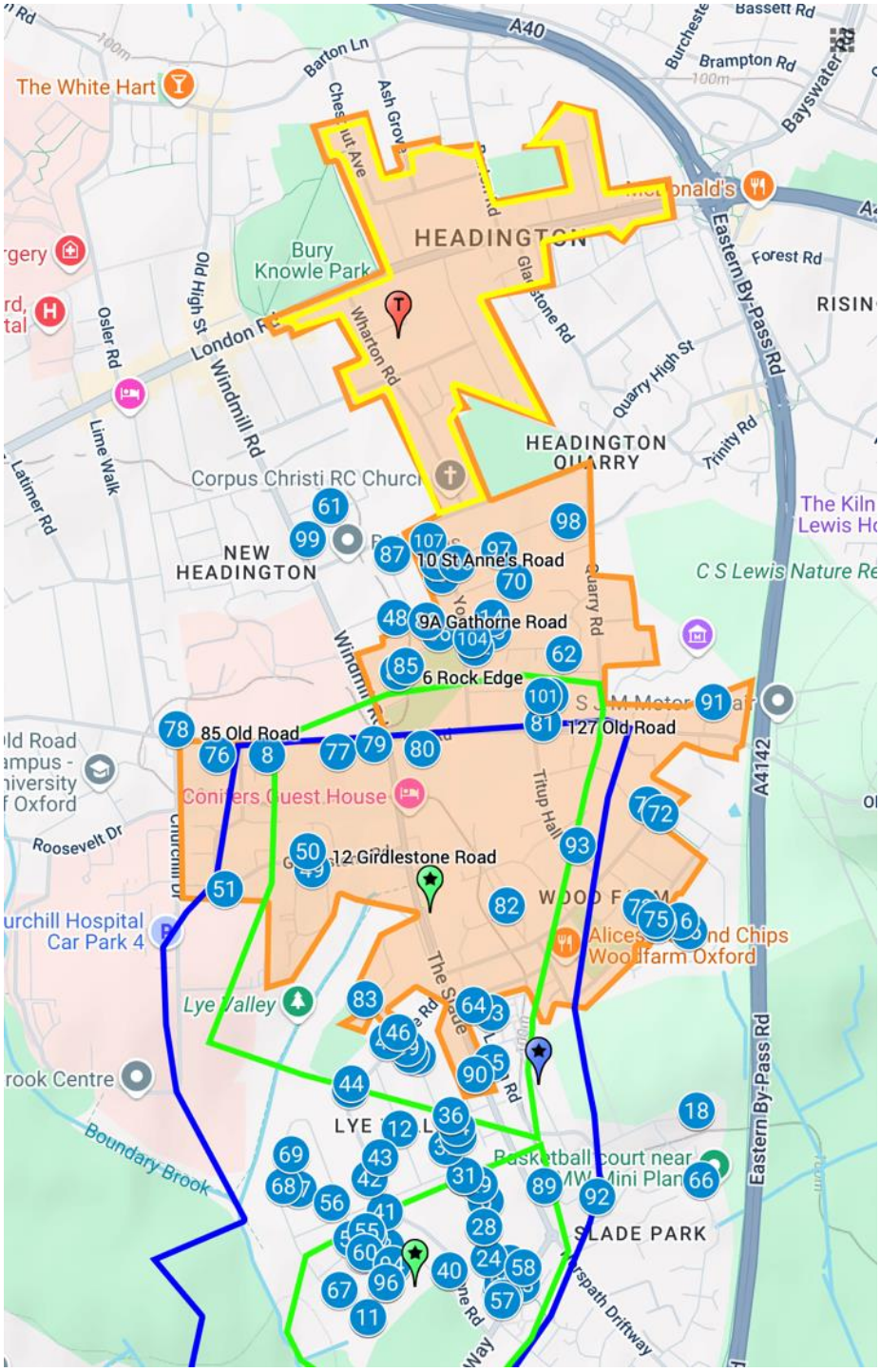
Planning applications have been tracked (by "SJ") since May 2020 in the "SJ Catchment ("SJC")" which consists of the Thames Water Catchment (92ha) (orange) and the Groundwater catchments for the North (49ha) (NFGC) and South Fen (SFGC) (21ha) (green)

As approximately 30ha of the North Fen Groundwater Catchment (NFGC) (49ha) is also in the Thames Water catchment only 10ha (of 49ha) is added due to overlap for a total of:

SJC Catchment=92ha (TW) +10ha (not overlapped NFGC) +21ha (SFGC)=123ha.

The SJ tracking does not include 22.3ha north of Margaret Road in the Thames Water catchment (marked yellow), so the SJC is 123ha-22.3ha= 101ha.

SJ recorded 108 planning applications (with a few permitted development checks and a very small number outside the area) in the SJC almost all consented, some ongoing (none refused included), tracked in the period May 2020 to July 2025 or 21.8 per year by SJ as below:



SJC Planning Applications May 2020 – July 2025 tracked in the TW (Orange) and Groundwater (Green) Catchments, minus the yellow SJ Excluded Catchment part above

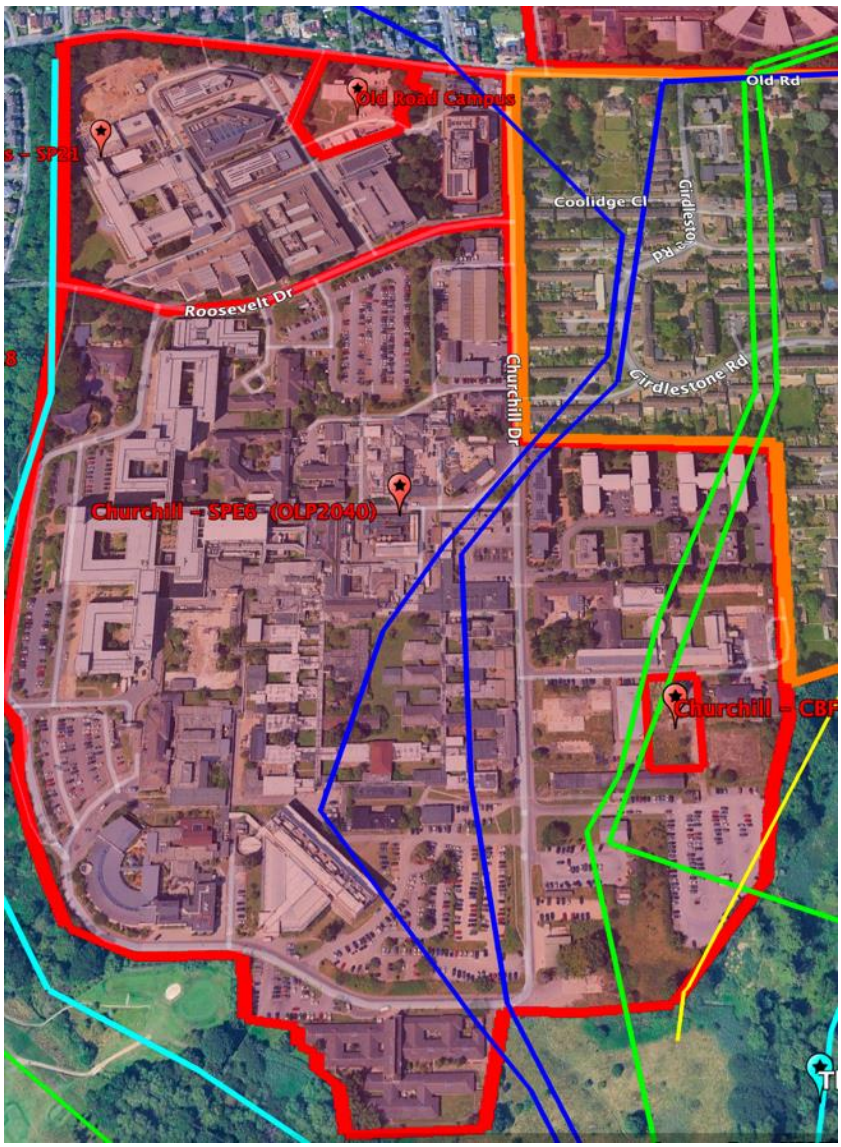
Link: ***https://www.google.com/maps/d/edit?mid=1mhRyWonwe6HSbFrnCIGlEo0g69Ndy2A&usp=sharing***

See: Appendix A and Appendix B (not mapped) for source data.

SDC Tracking - Analysis of Data

The below is best case due to:

- The largely residential nature of the SJC catchment
- Exclusion of Headington Shops, an area of dense and ongoing development
- It mostly does not account for permitted development (up to 50% increase in area permitted) or global warming
- Exclusion of the large, impermeable and close development sites to the west – The hospitals and campuses of the OUHT shown in red on the master map, which have had, and will have, large scale development and very high percentage of impermeable surfaces:



Vast impermeable area of the Churchill Hospital draining into Boundary Brook to South Fen

Small developments frequently involve modernising a sewer system from an old roof that discharges directly to the ground to one that connects directly to the rainwater sewer.

The description of the few permitted development check applications collected by SJ support the effect of permitted development, with rear extensions etc, all untracked by the Council if a PDC is not submitted.

Appendix B contains a list of nearly 300 permitted development checks since 2025 (some in catchment etc), not included in this calculation.

The results of the SJ catchment (SJC) of 101h.a. can be extrapolated to the whole Study Area catchment of 390 ha (Report table 6-3):

Description	Calculation
Size of SJC catchment above	101ha
Permeable to impermeable surface per year	21.8 Applications * 50sqm (per app lost) =1090sqm or 0.11ha p.a. (per annum)
Remaining permeable surface percent (TW)	62.5%
Impermeable surface percent (TW)	37.5%
Current permeable surface (SJC)	101*0.625=63ha
Current impermeable surface (SJC)	101*0.375=38ha
Percentage of catchment lost per year (SJC)	0.11/101*100=0.1% (ha all apps pa/total catchment size)
Percentage of permeable catchment p.a lost (SJC)	0.11/63*100=0.17% (ha all apps p.a./permeable catchment size)
Percentage of impermeable catchment added to, p.a. (SJC)	0.11/38*100=0.28% (ha all apps p.a./permeable catchment size)
Percentage of impermeable catchment added to in 20 years (Planning Applications) SJC	0.28*20=5.6% is added to original impermeable area
Adding permitted development rights and unconsented work at 50%	0.42*20 years =**8.4% increase in runoff**
Total Applications in whole Study Area extrapolated from number above	SJ Area: 101ha/21.8 apps =4.6 per h.a. **Total Area: 390/4.6=84.7 applications per year**

SDC Tracking - Results

- The number of SMALL applications is 84.7 p.a. extrapolated from the SJC catchment not 3 as claimed, ***or 28 times more***
- The IMPERMEABLE area will increase by 8.4% in 20 years, the rate of loss is 43 times the 0.2% given in the report as the impermeable, contributing area is nearly three times smaller than the whole catchment, and the number of applications being much greater.

Surface Water - Conclusions

All sewers from the TW Catchment forming part of the SJC catchment described above (above the Lye Valley SSSI) lead to the Thames Water Outfalls at the head of the valley, leading to regular floods, the recent loss of leaky dams, a catastrophic flood event in 1979 (Report p.19) which changed the valley profile, and slumping of peat. (Report p.22)

Lamberth specifically states (p.27) that the North Fen water levels and extent were greater in the past with less defined streams, with a major event occurring in 1979:

It was noted that major erosion of the peat and streambed occurred in the months July to December 1979. During that period A. Sandels recorded a loss of 1.25 m in stream base and an increase of 0.9 m in stream width. A further 1.5 m of bank erosion was observed between January and March 1980. Upstream cutting was about 1 m over the period July 1979 to March 1980. If the current topology of the streambed is used now to predict the levels of streambed in 1979 it can be seen that the water levels must have been considerably higher. (Lamberth, p.29)

4.4.1.3 The incised channel has led to the slumping of peat, and the lowering of the water table in the vicinity. This appears to have led to a loss of wetland species occupying these areas.
The work by the Friends of Lye Valley has aided in arresting this along the main water course. (Report, p.22)

The starting point therefore of any planning policy must be the immediate REDUCTION in surface flows from the sewers into the Lye, instead, the Report not only trivialises and underestimates the effect of small development, it SUPPORTS excluding them from very necessary checks and removal from permitted development rights required.

General Points

Solutions Absent

There is no attempt at all in the report to suggest mechanisms or solutions by which Thames Water and Oxford City Council could ameliorate the damage its sewers are doing which could include:

- Diversion of the Thames Water sewer flow running along The Slade back into the Lye water course
- Increase the size and efficiency of the attention tanks at the head of Boundary Brook run by the OUHT
- Assist the Friends of the Lye Valley with leaky dams and other mitigation measures
- Measures Oxford City Council could take to slow the flow with leaky dams, water tanks and SUDs for householders

Article 4 Directions Required

Many permitted developments occur in the Lye Valley Catchments, these are not subject to planning control, therefore it is possible for example to increase the impermeable area of a house by 50% - if these rights are not withdrawn, the impermeable area of the catchment will continue to increase with no awareness or monitoring by the Council.

Upper Lye Valley

The surface water catchment diagrams from third party sources clearly show (Report, Fig 3-18) this former watercourse which is duplicated on "Catchment Zones on xiii" exists, but it is completely ignored in the report although CRITICAL to recovery of the Lye. This dried up when the now Thames Water sewer was installed along The Slade, but the mapping clearly indicates this WOULD be the surface flow were the Thames Water sewer not to exist:

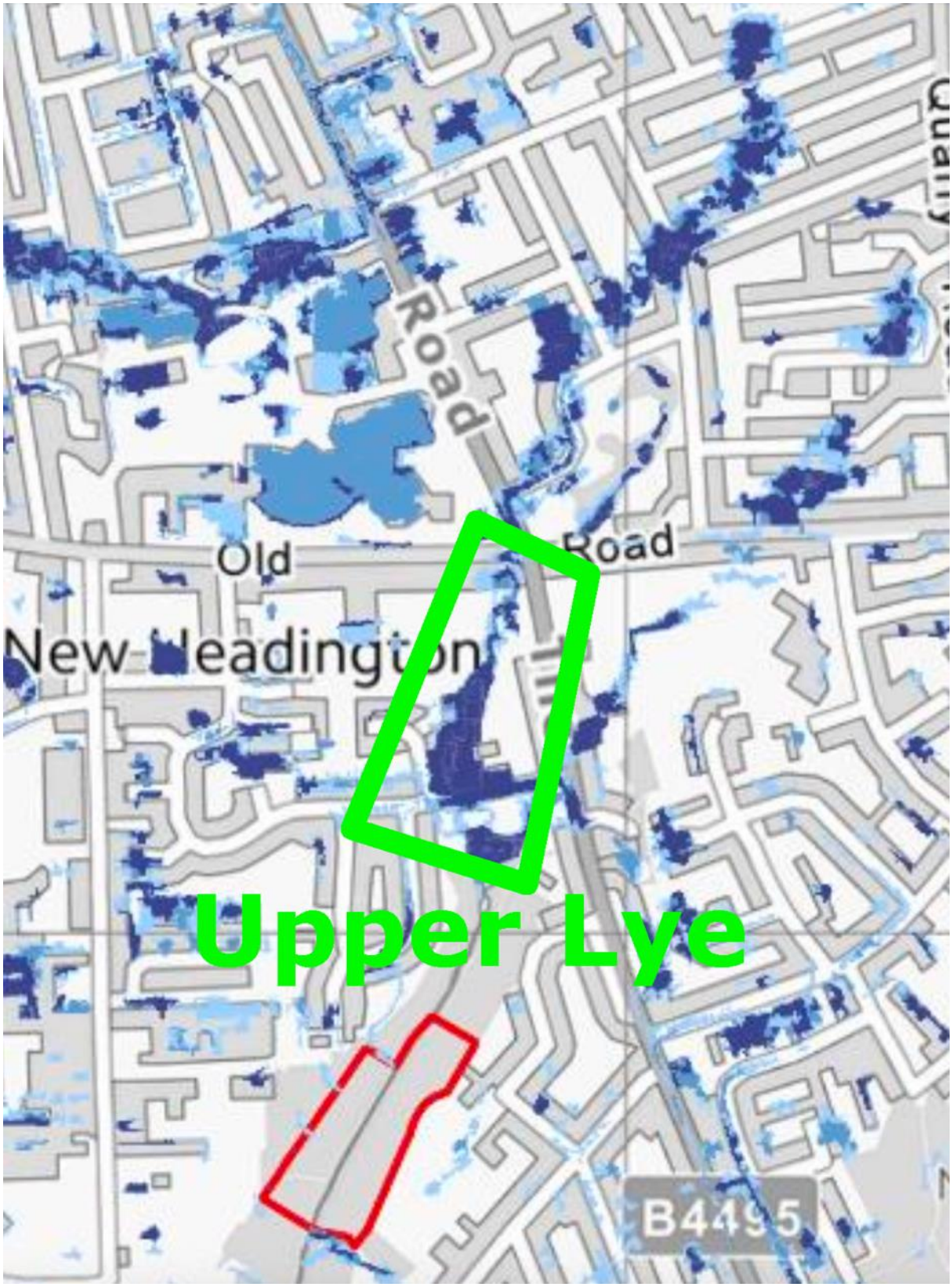


Fig: The Upper Lye Valley (Continues NE)

The redirection of stormwater into the large Thames Water sewer which flows along The Slade and into the outfalls marked at the head of the North Fen SSSI, into this valley to reconstitute the Lye running along this section is a major solution to reducing flow rates.

The importance of preventing further development here is not even understood.

See: https://headingtonheritage.wordpress.com/the-upper-lye-the-secret-garden/

Tipped Embankments - Warren Crescent etc

The building of 10 houses on the green at Warren Crescent on a tipped embankment with a steep slope was foolhardy in the extreme, especially as the treeline and roots are the only thing preventing it sliding into the Lye, which unfortunately blocks out the south facing light to the rear of the properties, so is at risk of poisoning or illegal trimming.

The following seems to have been stated simply to avoid the Council from embarrassment:

Based on historic ground investigation data, together with LIDAR data, Made Ground is known to be present and associated with a tip along the northwest edge of the Lye Valley. The emplacement of Made Ground next to Warren Crescent is thought to have occurred around 1970 (see Figure 3-21) (note this is not mapped by the BGS). The tip avoids the main seepage face from a limestone band (see Section 3.7.7.1). ***Placement of tipped material on the seepage face may have been deliberately avoided as it would cause stability issues*** *(i.e. tipping on a wet slope would have been more prone to slumping and collapse).*

There is no relevant information in 3.7.7.1. The site was intended as a playground as marked on the original estate plans, and a location to get rid of the excess material from the levelling operation, there is not a scintilla of evidence it was placed to avoid the main seepage line, and the geology here is no different to further down the valley, there are springs emerging from the base of the tipped embankment, which are evidence that the tipped embankment slump directly below the houses is not even addressed.

This seems to be a clumsy attempt to exculpate the Council for the foolish 10 house development at Warren Crescent ON the tipped embankment.

The diagram on Report page x stating it "avoided seepage face" also is without foundation.

The tipped embankment below was formed in early1961, with an earlier dumping slightly upstream, not the 1970s:

Source: https://heritagesearch.oxfordshire.gov.uk/images/POX0450624

Other tipped embankments on the south side of the valley are ignored, although these have buried large sections of former fen.

Report - Appendix D

The Report Appendix D appears to have a cut and paste issue and does not concord with the 3 applications referred to in the main text.

References

[1] Investigation of the possible hydrological effects on the Lye Valley Sites of Special Scientific Interest and the riparian zones of the Lye and Boundary Brooks as a result of development on Southfield Golf Course, A pre-EIA assessment, Oct 2007, Dr Curt Lamberth, Oxford City Council

[2] Thames Water Utilities Limited, (Feb 2012), Lye Valley Brook SSSI Catchment Investigation Final Report, RT/EWI/CH11/216/01.00, 41518877, Table 5-1, p.11

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Version LP2045 – 20/02/2026

Appendix A

The SJC Source Application List

The below is the source list compiled by SJ for planning applications between May 2018 and now in the SJC catchment described above.

https://www.friendsoflyevalley.org.uk/threats/planning_applications.html

Current plans (not yet decided)

Address (alphabetical by street)	Proposal	Reference (linked to plans)
75 Town Furze	Demolition of existing garage. Erection of a two-storey side extension and a part single-, part two-storey rear extension. Formation of 1no. rear dormer in association with a loft conversion. Insertion of 3no. rooflights to front elevation. Alterations to fenestrations. Change of use from dwellinghouse (Use Class C3) to a larger house in multiple occupation (Sui Generis). Provision of bin and cycle storage	25/01481/FUL
52 Bulan Road	Erection of a part single-, part two-storey rear extension. Alterations to fenestration	25/01191/FUL
42 Town Furze	Demolition of the existing garage, erection of a two-storey side extension to create 2 x 1 bedroom houses (Use Class C3)	25/01225/FUL
17 York Avenue	Erection of single-storey rear extension. Alterations to roof to allow first-floor rear extension. (Part-retrospective)	25/01179/FUL
8 Bulan Road	Change of use from dwellinghouse (Use Class C3) to a large House in Multiple Occupation (Sui Generis). Alterations to hip to gable, formation of 1no. rear dormer in association with a loft conversion. Erection of a rear extension. Provisions of bin and cycle storage	25/00685/FUL
40 Bulan Road	Erection of a part single- part two-storey rear extension	25/00469/FUL
111 Dene Road	Partial demolition of existing rear extension. Erection of a two-storey front extension and a single-storey rear extension. Formation of raised decking to rear	24/03047/FUL
66 Old Road	Sub-division of existing dwellinghouse to create a 1 x 5-bed and 1 x 3-bed dwellinghouses (Use Class C3). Demolition of 2no. Chimneys, greenhouse and side extension. Erection of a part single, part two storey extension to side and rear and new greenhouse. Formation of dormer windows to front roof slope, and insertion of rooflights to front and rear roof slopes in association with a loft conversion. Insertion of solar panels to rear roof slope, air source heat pumps to front elevation, and privacy screen to rear balcony. Alterations to fenestration and landscaping. Provision of bin and cycle stores and rain store tank	25/00903/FUL
45 Town Furze	Demolition of existing garage. Erection of two-storey side extension	25/00784/FUL
9 Dene Road	Demolition of existing conservatory and erection of a part single- part two-storey rear extension. Formation of side porch and rear patio. Provision of 3no. car parking spaces Additional recent applications: Approved: 23/01268/CPU and 23/00775/H42 Refused: 23/00770/CPU Withdrawn: 22/00985/FUL	23/01907/FUL
75 Town Furze, Land west of	Erection of 2 x 4 bed dwelling houses (Use Class C3). Provision of amenity space, car parking and bin stores. Associated landscaping, boundary treatments and ancillary works	21/02639/FUL

Plans that have been approved (or permitted development with no prior approval required)

Address (Alphabetical by street)	Proposal	Reference (linked to plans)
23 Benson Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 6m, for which the maximum height would be 3.0m, and for which the height of the eaves would be 2.86m	25/00359/H42
1 Binswood Avenue	Demolition of existing rear lean-to. Erection of part single- part two-storey side and rear extension. Formation of glass veranda and retractable awning to rear elevation. Installation of 4no solar panels to rear elevation	21/02710/FUL
2 Binswood Avenue	Partial demolition of front boundary wall and porch, and demolition of existing garage, rear projection and outbuilding. Erection of a part single-, part two-storey side extension, single-storey rear extension and outbuilding. Installation of external insulation with render finish and 1no. air source heat pump. Insertion of 1no. rooflight to front elevation. Alterations to fenestration. Erection of new front boundary wall and alterations to landscaping	23/02695/FUL
Pony Pursuits Bracegirdle Road	Change of use of land from (Use Class F2) to residential (Use Class C3) to allow the erection of a 1-bed dwelling (Use Class C3). Provision of bin and cycle storage	22/01021/FUL
22–28 Bracegirdle Rd Playground at rear of	Variation of condition 2 (Develop in accordance with approved plans) of planning permission 18/00408/CT3 (Demolition of existing side extension to No. 22 Bracegirdle Road and Formation of new vehicular access. Erection of 3 No. single-storey buildings to create 2 x 1-bed and 2 x 2-bed residential retirement dwellinghouses (Use Class C3). Alterations to landscaping, provision of bin and cycle stores to each dwelling and provision of car parking.) to allow a single 5KW ASHP unit to each dwelling to improve the sustainability of the new buildings. Unit measures 980mm wide, 408mm deep and 840mm high and positioned outside cycle and bin stores	20/01075/VAR
27 Broad Oak	Demolition of existing garden outbuilding. Erection of two-storey side extension to include formation of garage. Erection of part single- part two-storey rear extension. Insertion of no.1 rooflight to rear elevation	21/02246/FUL
27 Broad Oak (Land adjacent to)	Variation condition 2 (accordance with approved plans) of planning permission 18/02113/CT3(Erection of a 1 x 2 bed dwelling house (Use Class C3). Provision of bin and cycle store) to allow adding a single 5KW ASHP unit to improve the sustainability of the new dwelling. Unit measures 980mm wide, 408mm deep and 840mm high and positioned outside cycle and bin stores	20/01077/VAR
3 Bulan Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 5.85m, for which the maximum height would be 2.82m, and for which the height of the eaves would be 2.82m	20/02947/H42
	Erection of single-storey rear extension. Conversion of existing 4-bed dwellinghouse to 2 x one-bed flat	21/00217/FUL
5 Bulan Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 6.00m, for which the maximum height would be 3.00m, and for which the height of the eaves would be 3.00m	25/00150/H42
8 Bulan Road	Application to certify that the proposed alterations to hip to gable. Formation of 1no. rear dormer in association with a loft conversion. Erection of a single-storey rear extension, Insertion of 1no window to the side elevation is lawful development	25/00684/CPU
12 Bulan Road	Application to certify that the proposed erection of a single-storey rear outbuilding and removal of existing fence is lawful development	23/02662/CPU
19 Bulan Road	Erection of part single, part two-storey rear extension	20/03288/FUL

28 Bulan Road	Erection of a single-storey extension to existing rear outbuilding	22/02684/FUL
29 Bulan Road	Erection of a two-storey front extension	23/02299/FUL
	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 6.00m, for which the maximum height would be 2.50m, and for which the height of the eaves would be 2.50m	23/02297/H42
35 Bulan Road	Erection of part single- part two-storey rear extension and single-storey rear outbuilding. Formation of front porch and front bay window. Removal of 1no door and insertion of 2no windows on side elevation	21/03299/FUL
50 Bulan Road	Change of use from House in Multiple Occupation (Use Class C4) to a large House in Multiple Occupation (Sui Generis). Erection of a two-storey front extension. Alterations to fenestration to front, side, and rear elevations. Provision of car parking, bin and cycle stores	24/02592/FUL
52 Bulan Road	Application for prior approval for the erection of a single- storey rear extension, which would extend beyond the rear wall of the original house by 6.0m, for which the maximum height would be 2.95m, and for which the height of the eaves would be 2.95m	24/02737/H42
	Erection of two-storey front infill extension. Insertion of 1no. door to side elevation. Installation of external insulation and render	24/02738/FUL
69 Bulan Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 3.60m, for which the maximum height would be 2.70m, and for which the height of the eaves would be 2.40m	22/00598/H42
74 Bulan Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 6.0m, for which the maximum height would be 3.0m, and for which the height of the eaves would be 3.0m	23/01821/H42
78 Bulan Road	Application to certify that the proposed demolition of existing single-storey rear garage and erection of a single-storey ancillary building [gym] is lawful development	21/00027/CPU
82 Bulan Road	Demolition of existing outbuilding. Erection of a part single- part two-storey rear extension. Erection of a two-storey front extension. Insertion of 1no. window and alteration to 1no. window to side elevation. Provision of bin and bike stores	22/02184/FUL
	Demolition of existing garage. Change of use from dwellinghouse (Use Class C3) to large House in Multiple Occupation (Sui Generis). Erection of a part single-part two-storey rear extension. Erection of a two-storey front extension. Removal of 1no. window and insertion of 1no. window to side elevation. Alterations to fenestration. Provision of bin and bike stores	23/01280/FUL
114 Bulan Road	Demolition of existing outbuilding. Erection of part single-, part two-storey rear extension, two-storey front extension and alterations to 1no. window to rear. Provision of bin and cycle stores	21/01705/FUL
117 Bulan Road	Demolition of existing side lean-to extension and front porch. Erection of a two storey front extension. Insertion of 2no. doors to side elevation. Alterations to 1no. window to side elevation. Provision of bin and bike store	23/02918/FUL
119 Bulan Road	Erection of a 2-storey building to create 3 x 1-bed flats and 1 x 1-bed flat (Use Class C3). Provision of amenity space, car parking, bin and cycle storage. Installation of air source pumps	23/01578/FUL
9 Dene Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 4.0m, for which the maximum height would be 2.71m, and for which the height of the eaves would be 2.71m	23/00775/H42

40 & 42 Dene Road	Demolition of existing single-storey rear extension, 2no. garages, 2no. outbuildings and porch. Erection of 2 x two-storey front extensions and a two-storey rear extension to allow conversion of existing dwelling-houses (Use Class C3) to create 4 x 2-bed flats (Use Class C3). Installation of 12no. solar panels. Provision of external stairway with terrace, private amenity space with screen wall, bin and cycle storage. Alterations to fenestration, landscaping and boundary treatment *Second* set of amended plans. Earlier application 21/00203/FUL withdrawn	22/01257/FUL
51 Dene Road	Application to certify that the proposed erection of a single-storey rear extension is lawful development	23/00134/CPU
65 Dene Road	Erection of a first-floor front extension and a part single-, part two-storey rear extension. Insertion of 1no window to side elevation and re-instating of 1no window to rear elevation. Removal of chimney to roof	22/01006/FUL
86 Dene Road	Erection of a single-storey rear extension and replacement of 1no. window to rear elevation	21/02771/FUL
113 Dene Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 5.8m, for which the maximum height would be 3.2m, and for which the height of the eaves would be 3m	21/00391/H42
139 Dene Road (Retrospective)	Demolition of existing rear outhouse and porch. Erection of a part single- part two-storey rear extension. Formation of 1no. rear dormer in association with a loft conversion. Insertion of 2no. rooflights to front elevation	20/02026/FUL
145 Dene Road	Removal of garage door and insertion of 1no. bay window. Conversion of the garage into habitable space	22/02251/FUL
12 Fair View	Alterations to roof. Erection of a two-storey rear extension. Insertion of 2no window to west elevation and 1no window to east elevation. Formation of new decking and stairs to north elevation and insertion of new bi-fold doors. Insertion of car charging point to south elevation and insertion of storage door area to west elevation. Alterations to existing garage to extend and form a new garden store	22/00298/FUL
9A Gathorne Road	Demolition of existing shed. Erection of a single-storey extension to existing rear outbuilding. Alterations to existing outbuilding roof and fenestration (Variation of Condition 2 of above refused)	24/01247/FUL
5 Girdlestone Road	Erection of a single-storey rear extension	20/03030/FUL
12 Girdlestone Road	Erection of a single-storey rear extension and front porch. Insertion of 1no. door to rear elevation. Alterations to landscaping. Provision of car parking	23/01232/FUL
53 Girdlestone Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 4m, for which the maximum height would be 3.54m, and for which the height of the eaves would be 2.4m	20/00805/H42
5 Glebelands	Demolition of existing garage, side extension and rear conservatory. Change of use from dwellinghouse (Use Class C3) to a larger house in multiple occupation (Sui Generis). Erection of a part single-, part two-storey side and rear extension. Formation of 1no. rear dormer and insertion of 1no. rooflight to front elevation and 1no. rooflight to rear elevation in association with a loft conversion. Alterations to 1no. rear window. Provision of bin and cycle stores and hedging	23/02147/FUL
7 Glebelands	Demolition of existing garage and single-storey rear extension. Erection of single-storey side extension and single-storey rear extension. Formation of decking and associated landscaping. Provision of car parking and associated landscaping	21/00544/FUL Variation: 24/00550/VAR
8 Glebelands	Demolition of existing garage. Partial demolition of existing single-storey rear extension. Erection of a two-storey side extension and a part two-, part single-	24/01414/FUL

	storey rear extension. Change of use from dwellinghouse (Use Class C3) to a large House in Multiple Occupation (Sui Generis). Provision of bin and cycle storage	
10 Glebelands	Application to certify that the proposed erection of a single storey rear outbuilding to be used as home office and gym is lawful development	24/02492/CPU
15 Glebelands	Demolition of the existing garage. Erection of a first-floor extension to convert existing bungalow into a two-storey dwelling. Alterations to 1no window on the front elevation and insertion of 1no window to the side elevation. Erection of a single-storey rear and side extension	22/02505/FUL
311 Hollow Way	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 3m, for which the maximum height would be 3m, and for which the height of the eaves would be 2.5m	21/00386/H42
317 Hollow Way	Erection of a part single-, part two-storey front extension and a single-storey side extension. Removal of 1no door and insertion of 2no windows to rear elevation	21/02260/FUL
1 Inott Furze	Demolition of existing rear extension. Erection of a part single- part two-storey side and rear extension. Alteration to 1no. window to rear elevation. Formation of car parking	22/00276/FUL
	Change of use from a dwellinghouse (Use Class C3) to a large House in Multiple Occupation (Sui Generis). Demolition of the existing rear extension. Erection of a part single- part two-storey side and rear extension. Alterations to 1no. window to rear elevation. Insertion of 1no rear dormer and 1no rooflight to the rear elevation, 1no rooflight to the front elevation in association with a loft conversion. Provision of cycle and bin stores	22/02019/FUL
75 Langley Close	Demolition of existing garage. Erection of a part single, part two storey side extension and front porch. Change of use from a house in multiple occupation (Use Class C4) to a larger house in multiple occupation (Sui Generis). Erection of bike storage. (Part retrospective)	23/01046/FUL
4 Larkfields	Erection of a single-storey side extension. Enlargement of existing front porch with alterations to roof and insertion of 1no. door. Removal of 1no. door to side elevation and insertion of 1no. window	23/02778/FUL
39 Leiden Road	Change of use from dwellinghouse (Use Class C3) to House in Multiple Occupation (Use Class C4). Erection of a single storey rear extension. Provision of bin and cycle stores	22/01000/FUL
74 Leiden Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 4.32m, for which the maximum height would be 3.06m, and for which the height of the eaves would be 2.99m.	21/00776/H42
110 Leiden Road	Application to certify that proposed erection of single-storey rear extension is lawful development	21/02885/CPU
27 Long Close	Application for the erection of a two-storey rear extension. Insertion of 1no. window front elevation	20/01245/FUL
12 Lye Valley	Erection of single-storey rear and side extension	23/01751/FUL
38 Lye Valley	Demolition of existing rear extension. Erection of a single-storey rear extension	22/01985/FUL
54 Lye Valley	Demolition of existing garage. Alterations to roof to form hip to gable. Formation of 1no. rear dormer in association with a loft conversion. Insertion of 4no. rooflights to front elevation	20/01709/FUL
26 Mark Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 6.00m, for which the maximum height would be 3.28m, and for which the height of the eaves would be 3.00m	23/01881/H42

59 Masons Road	Application for prior approval for the erection of a single storey rear extension, which would extend beyond the rear wall of the original house by 4.80m, for which the maximum height would be 3.00m, and for which the height of the eaves would be 2.70m	25/00240/H42
67 Masons Road	Application for prior approval for the erection of a single storey rear extension, which would extend beyond the rear wall of the original house by 5.95m, for which the maximum height would be 3.20m, and for which the height of the eaves would be 2.90m	25/01090/H42
5 Nuffield Road	Erection of single-storey rear extension. Conversion of garage to form habitable space. Erection of a single-storey infill extension to form front porch	20/00044/FUL
38 Nuffield Road	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 4m, for which the maximum height would be 2.8m, and for which the height of the eaves would be 2.6m	20/02890/H42
50 Nuffield Road	Erection of two-storey side extension to create 1 x 2 bed dwelling (Use Class C3). Provision of car parking, bin and cycle storage	20/01290/FUL
60 Old Road (land to rear of)	Demolition of existing garage and store. Erection of a three storey building to create 8 x 1 bed flats (Use Class C3). Formation of 2no. dropped kerbs and access onto Coolidge Close. Provision of private amenity space, bicycle parking and bin and cycle storage	24/02038/FUL 22/02175/FULapproved earlier
80 Old Road	Demolition of existing garden building. Erection of a two-storey side and rear extension. Alterations to roof to form hip to gable in association with a loft conversion	20/03227/FUL
85 Old Road	Demolition of existing garage. Erection of a single-storey rear extension. Removal of 1no. chimney. Formation of raised terrace to rear and associated landscaping. Alterations to fenestration. Replacement of front gates and fencing and existing driveway to be landscaped with gravel	22/02837/FUL
Old Surgery House, 88 Old Road	Erection of a part single- part two-storey side and rear extension. Alteration and enlargement of existing roof, including increase in ridge height, to form second floor accommodation. Insertion of 2no. rooflights to front elevation. Formation of front porch. Formation of pergola to rear elevation. Removal of 1no. window to side elevation	20/02463/FUL
96 Old Road	Erection of a single-storey rear extension, erection of a first-floor front extension, formation of a porch. Removal of 2no. windows to side elevation, 1no rooflight to front elevation and 1no. chimney. Alteration to fenestration	22/01495/FUL
127 Old Road	Erection of single-storey rear extension	21/03048/FUL
18 Pauling Road	Application to certify that the proposed demolition of existing side extension [and] erection of a single-storey side and rear extension is lawful development	25/00682/CPU
28 Peat Moors	Erection of a part single-, part two-storey rear extension	21/01608/FUL
6 Rock Edge	Demolition of existing garage. Erection of part single-part two-storey side and rear extension	21/02772/FUL
7 Rock Edge	Demolition of existing garage. Erection of a two-storey side and a single-storey rear extension. Provision of cycle store to rear elevation	20/03046/FUL
19 Rock Edge	Demolition of existing single-storey rear extension. Erection of a single-storey rear and side extension. Provision of bin and bike stores	21/03251/FUL
10 St Anne's Road	Erection of a single-storey rear extension	21/00488/FUL
54 St Anne's Road	Erection of a single-storey rear extension and insertion of 2no windows to side elevation	23/02420/FUL
13 The Slade	Erection of part single-, part two-storey rear extension	21/01156/FUL

63 The Slade	Demolition of existing porch. Erection of a part single- part two-storey rear extension. Erection of a two-storey front extension. Alteration to 1no. window to rear elevation	21/02286/FUL
8 Stansfield Close	Erection of a single storey rear and side extension. Alterations to garden room and associated excavation of the garden	24/00202/FUL
38 Stubbs Avenue	Erection of single-storey rear extension and formation of front porch. Insertion of 1no rooflight to rear elevation	21/02838/FUL
12 Titup Hall Drive	Demolition of front porch and erection of a new front porch. Erection of a two-storey side extension, single-storey rear extension and a first-floor rear extension	21/02168/FUL
45 Town Furze	Demolition of existing garage. Erection of a part single- part two-storey side extension with internal garage	21/01699/FUL
55 Town Furze	Demolition of existing rear store. Erection of part single-, part two-storey rear and side extension. Alteration to 1no. window to rear elevation	21/01853/FUL
	Demolition of rear porch and erection of a single-storey rear extension	22/01417/FUL
18 Weyland Road	Erection of a front porch and a single-storey rear extension	21/00887/FUL
62 Weyland Road	Erection of a single-storey rear extension	22/01009/FUL
93 Windmill Road	Demolition of the existing garage and outbuilding. Erection of a single-storey rear outbuilding to create 1 x 1 bed annexe	22/00594/FUL
15A York Avenue	Application for prior approval for the erection of a single-storey rear extension, which would extend beyond the rear wall of the original house by 7.50m, for which the maximum height would be 2.40m, and for which the height of the eaves would be 2.40m	25/00151/H42
	Erection of a single-storey extension to front elevation	25/00207/FUL
28 York Road	Removal of chimney stack. Erection of a single-storey rear extension	21/02319/CPU
32 York Road	Demolition of existing garage and exiting rear extension. Erection of a single storey outbuilding to form a self-contained ancillary annexe. Erection of a single-storey rear extension	21/01182/FUL
	Demolition of existing garage and existing rear extension. Erection of a single-storey outbuilding to form a self-contained ancillary annexe. Erection of a single storey rear extension. See also 21/01182/FUL below, also approved	22/01350/FUL
33 York Road	Demolition of existing rear extension. Erection of single-storey rear extension. Insertion of 3no rooflights	20/01181/FUL
41 York Road	Application to certify that the proposed single-storey rear extension is lawful development.	25/00402/CPU
53 York Road	Demolition of existing rear lean-to and detached garage. Erection of single-storey rear extension and first floor side extension. Alterations to roof to form hip to gable and formation of 1no rear dormer in association with loft conversion. Insertion of 3no rooflights to front elevation. Alterations to fenestration and 2no doors	21/02206/FUL
54 York Road	Demolition of existing rear lean-to. Erection of single-storey side and rear extension. Alterations to 1no window on side elevation	21/02462/FUL

H42 applications in the OX3 area since Jan 2017
Grey italic text means an earlier application that was superseded by a later one, or one that was withdrawn
Red italic text means the application was refused, or full planning permission was required

Date validated	Street	House No.	Postcode	City Council ward	Ref (linked to plans)	Decision
30 June 2025	Titup Hall Drive	22	OX3 8QF	Churchill	25/01661 /H42	Pending
05 June 2025	Gipsy Lane	69	OX3 7PU	Churchill	25/01267 /H42	Prior approval not required
23 May 2025	Grays Road	51	OX3 7PZ	Churchill	25/01276 /H42	Pending
19 May 2025	*Oxford Road*	*108*	*OX3 0RD*	*Marston*	*25/01228 /H42*	*Permission required*
06 May 2025	Masons Road	67	OX3 8QL	Churchill	25/01090 /H42	Prior approval not required
28 April 2025	Atkyns Road	10	OX3 8RA	Churchill	25/00906 /H42	Prior approval not required
28 March 2025	Copse Lane	91	OX3 0AU	Headington Hill & Northway	25/00646 /H42	Prior approval required and granted
28 March 2025	*Masons Road*	*67*	*OX3 8QL*	*Churchill*	*25/00817 /H42*	*Withdrawn*
28 March 2025	*Benson Road*	*20*	*OX3 7EH*	*Lye Valley*	*25/00816 /H42*	*Prior approval required and refused*
26 March 2025	Headley Way	125	OX3 7SS	Churchill	25/00787 /H42	Prior approval not required
25 March 2025	Quarry Road	11	OX3 8NT	Quarry & Risinghurst	25/00754 /H42	Prior approval required and granted
24 March 2025	*Broadhead Place*	*11*	*OX3 9RE*	*Headington Hill & Northway*	*25/00731 /H42*	*Prior approval required and refused*
17 March 2025	*Grays Road*	*51*	*OX3 7PZ*	*Churchill*	*25/00633 /H42*	*Refused*
21 February 2025	London Road	330	OX3 8DN	Quarry & Risinghurst	25/00384 /H42	Prior approval required and granted
17 February 2025	Benson Road	23	OX3 7EJ	Lye Valley	25/00359 /H42	Prior approval not required
03 February 2025	Masons Road	59	OX3 8QL	Churchill	25/00240 /H42	Prior approval not required
23 January 2025	Bulan Road	5	OX3 7HU	Lye Valley	25/00150 /H42	Prior approval not required
23 January 2025	York Avenue	15A	OX3 8NS	Quarry & Risinghurst	25/00151 /H42	Prior approval required and granted
07 January 2025	*Jack Straw's Lane*	*5*	*OX3 0DL*	*Headington Hill & Northway*	*25/00028 /H42*	*Prior approval required and refused*
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13 December 2024	*Coniston Avenue*	*52*	*OX3 0AW*	*Headington*	*24/02915 /H42*	*Prior approval required and refused*
05 December 2024	Weyland Road	49	OX3 8PE	Headington Quarry	24/02910 /H42	Prior approval not required

29 November 2024	Headley Way	38	OX3 0LU	Headington	24/02847 /H42	Prior approval required and refused
18 November 2024	Bulan Road	52	OX3 7HT	Lye Valley	24/02737 /H42	Prior approval not required
04 October 2024	Marston Road	319	OX2 0EP	Marston	24/02325 /H42	Permission required
20 August 2024	Grays Road	61	OX2 7PZ	Churchill	24/02044 /H42	Permission required
03 July 2024	Meaden Hill	23	OX3 9QJ	Headington Hill & Northway	24/01604 /H42	Prior approval required and refused
02 July 2024	Ramsay Road	25	OX3 8AY	Quarry & Risinghurst	24/01589 /H42	Prior approval not required
20 June 2024	Mather Road	28	OX3 9PG	Barton & Sandhills	24/01289 /H42	Refused
08 May 2024	Ramsay Road	25	OX3 8AY	Quarry & Risinghurst	24/01088 /H42	Refused
25 April 2024	Gipsy Lane	19	OX3 7PT	Churchill	24/00975 /H42	Permission required
23 April 2024	Weyland Road	61	OX3 8PE	Quarry & Risinghurst	24/00949 /H42	Prior approval not required
04 April 2024	Nuffield Road	64	OX3 8RF	Churchill	24/00801 /H42	Prior approval not required
15 January 2024	Downside Road	33	OX3 8HP	Quarry & Risinghurst	24/00046 /H42	Prior approval not required
04 January 2024	Headley Way	194	OX3 7TA	Headington	24/00028 /H42	Permission required
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19 December 2023	Weyland Road	13	OX3 8PE	Quarry & Risinghurst	23/02920 /H42	Prior approval not required
06 November 2023	Downside Road	33	OX3 8HP	Quarry & Risinghurst	23/02572 /H42	Refused
03 November 2023	Burlington Crescent	4	OX3 DY	Barton & Sandhills	23/02560 /H42	Permission required
04 October 2023	Bulan Road	29	OX3 7HU	Lye Valley	23/02297 /H42	Prior approval not required
18 August 2023	St Anne's Road	54	OX3 8NL	Headington	23/01937 /H42	Permission required
17 August 2023	Maltfield Road	24	OX3 9RG	Headington Hill & Northway	23/01755 /H42	Permission required
14 August 2023	Mark Road	46	OX3 8PA	Quarry & Risinghurst	23/01881 /H42	Prior approval not required
08 August 2023	St Anne's Road	54	OX3 8NL	Headington	23/01829 /H42	Withdrawn
07 August 2023	Bulan Road	74	OX3 7HT	Lye Valley	23/01821 /H42	Prior approval not required
01 August 2023	Toot Hill Butts	6	OX3 8LB	Quarry & Risinghurst	23/01759 /H42	Prior approval not required
16 June 2023	Marston Road	304	OX3 0JA	Marston	23/01381 /H42	Prior approval not required
16 June 2023	Marston Road	302	OX3 0JA	Marston	23/01380 /H42	Prior approval not required
06 June 2023	Hugh Allen Crescent	17	OX3 0HL	Marston	23/01260 /H42	Prior approval not required

05 June 2023	Kiln Lane	35	OX3 8HA	Quarry & Risinghurst	23/01259 /H42	Prior approval not required
15 May 2023	Kiln Lane	50	OX3 8EY	Quarry & Risinghurst	23/01021 /H42	Prior approval not required
04 April 2023	Dene Road	9	OX3 7EF	Lye Valley	23/00775 /H42	Prior approval not required
21 February 2023	*Gipsy Lane*	*79*	*OX3 7PU*	*Churchill*	*23/00329 /H42*	*Prior approval required and refused*
07 February 2023	Waynflete Road	124	OX3 8BN	Barton & Sandhills	23/00267 /H42	Prior approval not required
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02 December 2022	Marston Road	257	OX3 0EW	Marston	22/02867 /H42	Prior approval not required
29 November 2022	*Stephen Road*	*27*	*OX3 9AY*	*Headington*	*22/02829 /H42*	*Permission required*
03 October 2022	*St Anne's Road*	*10*	*OX3 8NL*	*Headington*	*22/02369 /H42*	*Permission required*
28 September 2022	Ingle Close	4	OX3 9DB	Headington Hill & Northway	22/02345 /H42	Prior approval not required
16 September 2022	Gipsy Lane	57	OX3 7PU	Churchill	22/02225 /H42	Prior approval not required
04 August 2022	Marston Road	425	OX3 0JG	Marston	22/01899 /H42	Prior approval not required
03 August 2022	*Gipsy Lane*	*57*	*OX3 7PU*	*Churchill*	*22/01830 /H42*	*Permission required*
08 June 2022	Collinwood Road	6	OX3 8HJ	Quarry & Risinghurst	22/01408 /H42	Prior approval not required
30 May 2022	*Ewin Close*	*3*	*OXE 0NE*	*Marston*	*22/01227 /H42*	*Permission required*
23 May 2022	*Derwent Avenue*	*1*	*OX3 0AR*	*Headington*	*22/01256 /H42*	*Prior approval required and refused*
03 May 2022	Ringwood Road	37	OX3 8JB	Quarry & Risinghurst	22/01061 /H42	Deemed consent
28 April 2022	*Coniston Avenue*	*27*	*OX3 0AN*	*Headington*	*22/01033 /H42*	*Permission required*
26 April 2022	*Shelley Close*	*5*	*OX3 8HB*	*Quarry & Risinghurst*	*22/01018 /H42*	*Permission required*
05 April 2022	*Ringwood Road*	*37*	*OX3 8JB*	*Quarry & Risinghurst*	*22/00838 /H42*	*Withdrawn*
14 March 2022	Old Marston Road	25	OX3 0JR	Marston	22/00641 /H42	Prior approval not required
09 March 2022	Bulan Road	69	OX3 7HZ	Lye Valley	22/00598 /H42	Prior approval not required
01 March 2022	Weyland Road	35	OX3 8PE	Quarry & Risinghurst	22/00552 /H42	Prior approval required and granted
23 February 2022	Margaret Road	18	OX3 8NQ	Quarry & Risinghurst	22/00485 /H42	Prior approval not required
21 February 2022	*Gouldland Gardens*	*10*	*OX3 9DQ*	*Headington Hill & Northway*	*22/00449 /H42*	*Prior approval required and refused*
08 February 2022	Arlington Drive	69	OX3 0SL	Marston	22/00224 /H42	Prior approval not required
08 February 2022	*Weyland Road*	*62*	*OX3 8PD*	*Quarry & Risinghurst*	*22/00327 /H42*	*Permission required*

19 January 2022	Old Marston Road	33	OX3 0JR	Marston	22/00109 /H42	Prior approval not required
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23 December 2021	Headley Way	12	OX3 0LT	Headington	21/03453 /H42	Prior approval not required
16 December 2021	Foxwell Drive	14	OX3 9QA	Headington Hill & Northway	21/03507 /H42	Prior approval required and granted
06 December 2021	Staunton Road	119	OX3 7TN	Headington	21/03326 /H42	Deemed consent
03 November 2021	*Beechey Avenue*	*22*	*OX3 0JU*	*Marston*	*21/03051 /H42*	*Permission required*
25 October 2021	*Old Marston Road*	*33*	*OX3 0JR*	*Marston*	*21/02935 /H42*	*Permission required*
20 October 2021	Gipsy Lane	25	OX3 7PT	Churchill	21/02837 /H42	Prior approval not required
20 October 2021	*Foxwell Drive*	*14*	*OX3 9QA*	*Headington Hill & Northway*	*21/02820 /H42*	*Prior approval required and refused*
08 October 2021	*Lyndworth Mews*	*7*	*OX3 9HJ*	*Quarry & Risinghurst*	*21/02678 /H42*	*Prior approval required and refused*
13 September 2021	*Eden Drive*	*27*	*OX3 0AD*	*Headington*	*21/02626 /H42*	*Prior approal required and refused*
18 August 2021	Downside Road	63	OX3 8HR	Quarry & Risinghurst	21/02284 /H42	Prior approval not required
09 July 2021	*Oxford Road*	*66*	*OX3 0RD*	*Marston*	*21/01954 /H42*	*Permission required*
09 July 2021	Valentia Road	3	OX3 7PN	Churchill	21/01936 /H42	Prior approval required and granted
06 July 2021	Foxwell Drive	54	OX3 9QF	Headington Hill & Northway	21/01926 /H42	Prior approval required and granted
01 June 2021	*Titup Hall Drive*	*12*	*OX3 8QF*	*Churchill*	*21/01530 /H42*	*Permission required*
29 May 2021	*Valentia Road*	*3*	*OX3 7PN*	*Churchill*	*21/01529 /H42*	*Withdrawn*
26 May 2021	*Eden Drive*	*27*	*OX3 0AD*	*Headington Hill & Northway*	*21/01229 /H42*	*Permission required*
24 May 2021	Park Way	3	OX3 0QH	Marston	21/01450 /H42	Prior approval not required
21 May 2021	Valentia Road	7	OX 3 7PN	Churchill	21/01439 /H42	Prior approval not required
18 May 2021	Leiden Road	74	OX3 8QS	Churchill	21/01267 /H42	Prior approval not required
14 May 2021	*Weldon Road*	*68*	*OX3 0HP*	*Marston*	*21/01366 /H42*	*Permission required*
19 April 2021	Rippington Drive	29	OX3 0RJ	Marston	21/01018 /H42	Prior approval not required
14 April 2021	Headley Way	47	OX3 0LS	Headington	21/00986 /H42	Prior approval not required
12 April 2021	*Foxwell Drive*	*54*	*OX3 9QF*	*Headington Hill & Northway*	*21/01049 /H42*	*Withdrawn*
06 April 2021	*Staunton Road*	*115*	*OX3 7TR*	*Headington*	*21/00964 /H42*	*Permission required*
26 March 2021	*Cherwell Drive*	*27*	*OX2 0NB*	*Marston*	*21/00626 /H42*	*Refused*

25 March 2021	Grays Road	35	OX3 7PZ	Headington	21/00766 /H42	Prior approval not required
22 March 2021	Borrowmead Road	45	OX2 9QP	Headington Hill & Northway	21/00818 /H42	Prior approval not required
22 March 2021	*Leiden Road*	*74*	*OX3 8QS*	*Churchill*	*21/00776 /H42*	*Prior approval not required (superseded by later approved application)*
22 March 2021	Ringwood Road	13	OX3 8JB	Quarry & Risinghurst	21/00810 /H42	Prior approval not required
04 March 2021	John Buchan Road	5	OX3 9QN	Headington Hill & Northway	21/00582 /H42	Prior approval not required
15 February 2021	Hollow Way	311	OX3 7JD	Lye Valley	21/00386 /H42	Prior approval not required
11 February 2021	Dene Road	113	OX3 7EQ	Lye Valley	21/00391 /H42	Prior approval not required
09 February 2021	*Borrowmead Road*	*45*	*OX3 9QP*	*Headington Hill & Northway*	*21/00333 /H42*	*Permission required*
25 January 2021	*Rippington Drive*	*29*	*OX3 0RJ*	*Marston*	*21/00153 /H42*	*Permission required*
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07 December 2020	Ringwood Road	29	OX3 8JB	Quarry & Risinghurst	20/02711 /H42	Prior approval not required
07 December 2020	*Weyland Road*	*18*	*OX3 8PD*	*Quarry & Risinghurst*	*20/03074 /H42*	*Permission required*
30 November 2020	Headley Way	24	OX3 0LT	Headington	20/02982 /H42	Prior approval not required
20 November 2020	Bulan Road	3	OX3 7HU	Lye Valley	20/02947 /H42	Prior approval not required
13 November 2020	Nuffield Road	38	OX3 8RE	Churchill	20/02890 /H42	Prior approval required and granted
09 November 2020	Marston Road	431	OX3 0JG	Marston	20/02790 /H42	Prior approval not required
26 October 2020	*Nuffield Road*	*38*	*OX3 8RE*	*Churchill*	*20/02697 /H42*	*Withdrawn*
19 October 2020	Weyland Road	17	OX3 8PE	Quarry & Risinghurst	20/02606 /H42	Prior approval not required
14 October 2020	*Crotch Crescent*	*57*	*OX3 0JL*	*Marston*	*20/02581 /H42*	*Permission required*
05 October 2020	Ringwood Road	29	OX3 8JB	Quarry & Risinghurst	20/02494 /H42	Prior approval not required
22 September 2020	*Bowness Avenue*	*18*	*OX3 0AJ*	*Headington*	*20/02287 /H42*	*Refused*
10 August 2020	Stanway Road	25	OX3 8HU	Quarry & Risinghurst	20/01962 /H42	Prior approval not required
20 July 2020	*Hollow Way*	*311*	*OX3 7JD*	*Hollow Way*	*20/01768 /H42*	*Prior approval required and refused*
15 July 2020	Collinwood Road	15	OX3 8HH	Quarry & Risinghurst	20/01726 /H42	Prior approval not required
19 June 2020	Marston Road	463	OX3 0JQ	Marston	20/01492 /H42	Prior approval required and granted
08 July 2020	*Foxwell Drive*	*54*	*OX3 9QF*	*Headington Hill & Northway*	*20/01660 /H42*	*Prior approval required and refused*

17 June 2020	Marston Road	313	OX3 0EP	Marston	20/01430 /H42	Permission required
16 June 2020	Lime Walk	74	OX3 7AE	Headington	20/01402 /B56	Prior approval required and granted
02 June 2020	Hollow Way	311	OX3 7JD	Lye Valley	20/01313 /H42	Prior approval required and refused
28 May 2020	Long Close	27	OX3 8TT	Churchill	20/01258 /H42	Planning approval not required
11 May 2020	Bulan Road	3	OX3 7HU	Lye Valley	20/01117 /H42	Withdrawn
06 May 2020	Headley Way	75	OX3 7SR	Headington	20/01100 /H42	Permission required
15 April 2020	Beech Road	14	OX3 7RR	Headington	20/00941 /H42	Prior approval not required
09 April 2020	Long Close	27	OX3 8TT	Churchill	20/00907 /H42	Prior approval not required
25 March 2020	Girdlestone Road	53	OX3 7NA	Churchill	20/00805 /H42	Prior approval not required
18 March 2020	Grunsell Close	7	OX3 9QQ	Headington Hill & Northway	20/00753 /H42	Prior approval not required
25 February 2020	Massey Close	13	OX3 7NE	Churchill	20/00531 /H42	Prior approval not required
25 February 2020	Massey Close	15	OX3 7NE	Churchill	20/00532 /H42	Prior approval required and refused
19 February 2020	Beech Road	14	OX3 7RR	Headington	20/00484 /H42	Permission required
18 February 2020	Headley Way	178	OX3 7SZ	Headington	20/00448 /H42	Permission required
14 February 2020	Cavendish Drive	3	OX3 0SB	Marston	20/00432 /H42	Permission required
12 February 2020	Valentia Road	39	OX3 7PN	Churchill	20/00383 /H42	Prior approval required and refused
06 January 2020	Massey Close	15	OX3 7NE	Churchill	20/00042 /H42	Prior approval required and granted
23 December 2019	Valentia Road	66	OX3 7PW	Churchill	19/03381 /H42	Permission required
23 December 2019	Cranley Road	23	OX3 8BP	Barton & Sandhills	19/03364 /H42	Prior approval required and refused
12 December 2019	Merewood Avenue	80	OX3 8EF	Barton & Sandhills	19/03267 /H42	Prior approval not required
09 December 2019	Pether Road	3	OX3 8QP	Churchill	19/03222 /H42	Prior approval not required
02 December 2019	Lye Valley	2	OX3 7EP	Lye Valley	19/03172 /H42	Withdrawn
29 November 2019	Marston Road	481	OX3 0JQ	Marston	19/03157 /H42	Permission required
14 November 2019	Massey Close	15	OX3 7NE	Churchill	19/02987 /H42	Prior approval required and refused
14 November 2019	Taverner Place	7	OX3 0LF	Marston	19/02951 /H42	Permission required

07 November 2019	John Buchan Road	1	OX3 9QN	Headington Hill & Northway	19/02894 /H42	Withdrawn
31 October 2019	Cherwell Drive	31	OX3 0NB	Marston	19/02840 /H42	Prior approval not required
24 October 2019	Lye Valley	2	OX3 7EP	Lye Valley	19/02728 /H42	Permission required
23 October 2019	Ouseley Close	33	OX3 0JS	Marston	19/02716 /H42	Prior approval not required
26 September 2019	Piper Street	12	OX3 7AR	Headington	19/02454 /H42	Permission required
30 August 2019	Ouseley Close	33	OX3 0JS	Marston	19/02296 /H42	Refused
14 August 2019	Grays Road	59	OX3 7PZ	Churchill	19/02176 /H42	Prior approval not required
14 August 2019	Malford Road	5	OX3 8BT	Barton & Sandhills	19/02175 /H42	Prior approval not required
07 August 2019	Forest Road	19	OX3 8LF	Quarry & Risinghurst	19/02132 /H42	Prior approval required and refused
05 August 2019	John Buchan Road	1	OX3 9QN	Headington Hill & Northway	19/02072 /H42	Prior approval not required
29 July 2019	Margaret Road	66	OX3 8NQ	Quarry & Risinghurst	19/02044 /H42	Permission required
26 July 2019	Headley Way	26	OX3 0LT	Headington	19/02031 /H42	Prior permission required and refused
22 July 2019	Marsh Lane	38	OX3 0NG	Marston	19/01999 /H42	Permission required
05 July 2019	Headley Way	123	OX3 7SS	Headington	19/01791 /H42	Prior approval not required
26 June 2019	Bassett Road	1	OX3 9PF	Barton & Sandhills	19/01725 /H42	Permission required
26 June 2019	Ramsay Road	57	OX3 8AY	Quarry & Risinghurst	19/01736 /H42	Permission required
13 June 2019	John Buchan Road	20	OX3 9QN	Headington Hill & Northway	19/01574 /H42	Permission required
07 June 2019	Elms Drive	26	OX3 0NJ	Marston	19/01536 /H42	Permission required
05 June 2019	Lodge Close	26	OX3 0QP	Marston	19/01516 /H42	Permission required
30 May 2019	Windmill Road	169	OX3 7DW	Headington	19/01459 /H42	Prior approval required and granted
29 May 2019	Pauling Road	19	OX3 8PU	Churchill	19/01451 /H42	Prior approval not required
07 May 2019	Kiln Lane	49	OX3 8HA	Quarry & Risinghurst	19/01438 /H42	Permission required
01 May 2019	Croft Road	68	OX3 0JZ	Marston	19/01230 /H42	Permission required
25 April 2019	Benson Road	18	OX3 7EH	Lye Valley	19/01086 /H42	Refused
03 April 2019	Green Road	59	OX3 8LD	Quarry & Risinghurst	19/00878 /H42	Permission required
08 April 2019	Ferry Road	56	OX3 0EU	Marston	19/00910 /H42	Refused
01 April 2019	Quarry Road	49A	OX3 8NU	Quarry & Risinghurst	19/00841 /H42	Permission required
29 March 2019	Headley Way	26	OX3 0LT	Headington	19/00801 /H42	Prior approval required and refused

26 March 2019	Derwent Avenue	46	OX3 0AP	Headington	19/00778 /H42	Prior approval not required
07 March 2019	Downside Road DUP	31	OX3 8HP	Quarry & Risinghurst	19/00614 /H42	Planning approval not required
06 March 2019	*Derwent Avenue*	*11*	*OX3 0AR*	*Headington*	*19/00583 /H42*	*Permission required*
19 February 2019	*Franklin Road*	*39*	*OX3 7SB*	*Headington*	*19/00442 /H42*	*Permission required*
12 February 2019	Bulan Road	41	OX3 7HU	Churchill	19/00365 /H42	Prior approval not required
11 February 2019	*Franklin Road*	*37*	*OX3 7SB*	*Headington*	*19/00349 /H42*	*Permission required*
04 February 2019	Warren Crescent	61	OX3 7NQ	Churchill	19/00298 /H42	Prior approval required and granted
30 January 2019	*Headley Way*	*26*	*OX3 0LT*	*Headington*	*19/00246 /H42*	*Prior approval required and refused*
30 January 2019	*Marston Road*	*311*	*OX3 0EW*	*Marston*	*19/00241 /H42*	*Application withdrawn*
21 January 2019	Milne Place	10	OX3 9DG	Headington Hill & Northway	19/00162 /H42	Planning approval required and granted
07 January 2019	*Downside Road DUP*	*31*	*OX3 8HP*	*Quarry & Risinghurst*	*19/00034 /H42*	*Permission required*
21 December 2018	*Warren Crescent*	*61*	*OX3 7NQ*	*Churchill*	*18/03378 /H42*	*Prior approval required and refused*
18 December 2017	Everard Close	3	OX3 7NB	Churchill	17/03372 /H42	Prior approval not required
14 December 2018	Bassett Road	23	OX3 9AA	Barton & Sandhills	18/03296 /H42	Prior approval not required
27 November 2018	*Park Way*	*13*	*OX3 0QH*	*Marston*	*18/03128 /H42*	*Prior approval required and refused*
21 November 2018	*Warren Crescent*	*61*	*OX3 7NQ*	*Churchill*	*18/03039 /H42*	*Prior approval required and refused*
20 November 2018	*Bassett Road*	*23*	*OX3 9PF*	*Barton & Sandhills*	*18/02996 /H42*	*Application withdrawn*
01 November 2018	Cherwell Drive	31	OX3 0NB	Marston	18/02917 /H42	Prior approval required and granted
01 November 2018	*Staunton Road*	*119*	*OX3 7TN*	*Headington*	*18/02916 /H42*	*Prior approval required and refused*
11 October 2018	Headley Way	168	OX3 7SZ	Headington	18/02728 /H42	Prior approval not required
03 October 2018	Hugh Allen Crescent	53	OX3 0HL	Marston	18/02650 /H42	Prior approval required and granted
27 September 2018	Nicholas Avenue	3	OX3 0RN	Marston	18/02584 /H42	Prior approval not required
10 September 2018	*Downside Road*	*31*	*OX3 8HP*	*Quarry & Risinghurst*	*18/02419 /H42*	*Permission required*

08 August 2018	Masons Road	20	OX3 8QJ	Quarry & Risinghurst	18/02127 /H42	Prior approval required and granted
12 June 2018	Arlington Drive	78	OX3 0SJ	Marston	18/01567 /H42	Prior approval not required
04 June 2018	*Masons Road*	*20*	*OX3 8QJ*	*Quarry & Risinghurst*	*18/01484 /H42*	*Prior approval required and refused*
03 May 2018	Foxwell Drive	36	OX3 9QD	Headington Hill & Northway	18/01169 /H42	Prior approval not required
03 May 2018	Purcell Road	23	OX3 0EZ	Marston	18/01163 /H42	Prior approval not required
25 April 2018	Headley Way	150	OX2 7SZ	Headington	18/01090 /H42	Prior approval required and granted
24 Aoril 2018	Goslyn Close	2	OX3 7ND	Churchill	18/01073 /H42	Prior approval not required
16 April 2018	*Coniston Avenue*	*17*	*OX3 0AN*	*Headington Hill & Northway*	*18/01001 /H42*	*Permission required*
13 April 2018	Gipsy Lane	23	OX3 7PT	Churchill	18/00985 /H42	Prior approval not required
13 April 2018	Gipsy Lane	21	OX3 7PT	Churchill	18/00983 /H42	Prior approval not required
11 April 2018	Warren Crescent	16	OX3 7NG	Churchill	18/00954 /H42	Prior approval not required
10 April 2018	*Nuffield Road*	*77*	*OX3 8RH*	*Churchill*	*18/00955 /H42*	*Prior approval required and refused*
09 April 2018	*Arlington Drive*	*78*	*OX3 0SJ*	*Marston*	*18/00944 /H42*	*Prior approval required and refused*
06 April 2018	Grovelands Road	16	OX3 8HZ	Quarry & Risinghurst	18/00720 /H42	Prior approval not required
05 April 2018	*York Road*	*11*	*OX3 8NR*	*Headington*	*18/00899 /H42*	*Permission required*
21 March 2018	*Headley Way*	*150*	*OX3 7SZ*	*Headington*	*18/00786 /H42*	*Application withdrawn*
21 March 2018	*Old Road*	*15*	*OX3 7JY*	*Churchill*	*18/00787 /H42*	*Permission required*
26 February 2018	Marston Road	273	OX3 0EW	Marston	18/00504 /H42	Prior approval not required
26 February 2018	Ringwood Road	42	OX3 8JA	Quarry & Risinghurst	18/00557 /H42	Prior approval not required
19 February 2018	Peacock Road	5	OX3 0DQ	Marston	18/00463 /H42	Prior approval required and granted
06 February 2018	*London Road*	*198*	*OX3 9EE*	*Quarry & Risinghurst*	*18/00331 /H42*	*Permission required*
08 February 2018	*Headley Way*	*150*	*OX3 7SZ*	*Headington*	*18/00336 /H42*	*Application withdrawn*
31 January 2018	The Slade	61	OX3 7HN	Churchill	18/00264 /H42	Prior approval not required
04 January 2018	Lime Walk	68	OX3 7AE	Headington	18/00030 /H42	Prior approval required and granted
02 January 2018	*Gipsy Lane*	*23*	*OX3 7PT*	*Churchill*	*18/00010 /H42*	*Prior approval required and refused*
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18 December 2017	*Everard Close*	*3*	*OX3 7NB*	*Churchill*	*17/03372 /H42*	*Prior approval not required but superseded by later plans*
13 December 2017	*Stapleton Road*	*8*	*OX3 7LU*	*Headington*	*17/03313 /H42*	*Permission required*

12 December 2017	*Everard Close*	*3*	*OX3 7NB*	*Churchill*	*17/03372 /H42*	*Prior approval not required but superseded by later plans*
21 November 2017	New High Street	81	OX3 7AL	Headington	17/03092 /H42	Prior approval not required
16 November 2017	*Everard Close*	*3*	*OX3 7NB*	*Churchill*	*17/03026 /H42*	*Application withdrawn*
02 November 2017	Headley Way	127	OX3 7SS	Headington	17/02915 /H42	Prior approval not required
20 October 2017	*Rippington Drive*	*35*	*OX3 0RJ*	*Marston*	*17/02820 /H42*	*Permission required*
18 October 2017	Atkyns Road	4	OX3 8RA	Churchill	17/02789 /H42	Prior approval not required
13 October 2017	*Langley Close*	*77*	*OX3 7DB*	*Headington*	*17/02736 /H42*	*Refused*
16 October 2017	*Holyoake Road*	*17*	*OX3 8AF*	*Quarry & Risinghurst*	*17/02753 /H42*	*Refused*
23 October 2017	*Everard Close*	*3*	*OX3 7NB*	*Churchill*	*17/02620 /H42*	*Prior approval not required but superseded by later plans*
03 October 2017	Marston Road	391	OX3 0JF	Marston	17/02616 /H42	Prior approval not required
27 September 2017	Cromwell Close	10	OX3 0RW	Marston	17/02559 /H42	Prior approval not required
19 September 2017	Stanway Road	49	OX3 8HU	Quarry & Risinghurst	17/02061 /H42	Prior approval not required
08 September 2017	St Leonard's Road	50	OX3 8AB	Quarry & Risinghurst	17/02334 /H42	Prior approval not required
29 August 2017	*Bickerton Road*	*11*	*OX3 7LT*	*Headington*	*17/02285 /H42*	*Permission required*
22 August 2017	Margaret Road	52	OX3 8NQ	Quarry & Risinghurst	17/02282 /H42	Prior approval not required
25 August 2017	*Langley Close*	*77*	*OX3 7DB*	*Headington*	*17/02199 /H42*	*Application withdrawn*
16 August 2017	*Mortimer Drive*	*46*	*OX3 0RU*	*Marston*	*17/02188 /H42*	*Permission required*
15 August 2017	*Atkyns Road*	*4*	*OX3 8RA*	*Churchill*	*17/02178 /H42*	*Prior approval required and refused*
11 August 2017	London Road	221	OX3 9JA	Barton & Sandhills	17/02146 /H42	Prior approval not required
11 August 2017	*Everard Close*	*3*	*OX3 7NB*	*Churchill*	*17/02098 /H42*	*Application withdrawn*
08 August 2017	Kennett Road	10A	OX3 7BJ	Headington	17/02092 /H42	Prior approval required and granted
07 August 2017	*Gladstone Road*	*31*	*OX3 8LL*	*Quarry & Risinghurst*	*17/02062 /H42*	*Permission required*
18 July 2017	*York Road*	*23*	*OX3 8NR*	*Quarry & Risinghurst*	*17/01872 /H42*	*Prior approval required and refused*
14 July 2017	Everard Close	1	OX3 7NB	Churchill	17/01850 /H42	Prior approval not required
11 July 2017	*Atkyns Road*	*4*	*OX3 8RA*	*Churchill*	*17/01785 /H42*	*Prior approval required and refused*

26 July 2017	*Marston Road*	*391*	*OX3 0JF*	*Marston*	*17/01750 /H42*	*Prior approval required and refused*
29 June 2017	*Kennett Road*	*10A*	*OX3 7BJ*	*Headington*	*17/01688 /H42*	*Prior approval required and granted but superseded by later plans*
28 June 2017	Fairfax Avenue	16	OX3 0RP	Marston	17/01670 /H42	Prior approval not required
27 June 2017	Quarry Road	58	OX3 8NX	Quarry & Risinghurst	17/01653 /H42	Prior approval not required
26 June 2017	Holyoake Road	26	OX3 8AE	Quarry & Risinghurst	17/01629 /H42	Prior approval not required
15 June 2017	*Rippington Drive*	*9*	*OX3 0RH*	*Marston*	*17/01536 /H42*	*Permission required*
13 June 2017	Kennett Road	50	OX3 7BJ	Headington	17/01479 /H42	Prior approval not required
23 May 2017	Collinwood Road	78	OX3 8HL	Quarry & Risinghurst	17/01293 /H42	Prior approval not required
16 May 2017	Lime Walk	4	OX3 7AE	Headington	17/01198 /H42	Prior approval not required
09 May 2017	Weyland Road	11	OX3 8PE	Quarry & Risinghurst	17/01148 /H42	Prior approval not required
02 May 2017	Valentia Road	52	OX3 7PL	Churchill	17/01079 /H42	Prior approval not required
04 April 2017	Weyland Road	25	OX3 8PE	Quarry & Risinghurst	17/00876 /H42	Prior approval not required
20 March 2017	Bulan Road	128	OX3 7HY	Lye Valley	17/00735 /H42	Prior approval not required
17 March 2017	Valentia Road	23	OX3 7PN	Churchill	17/00696 /H42	Prior approval not required
08 March 2017	Copse Lane	174	OX3 0AX	Headington Hill & Northway	17/00644 /H42	Prior approval not required
02 March 2017	Girdlestone Road	34	OX3 7NA	Churchill	17/00576 /H42	Prior approval not required
28 February 2017	Burchester Avenue	23	OX3 9ND	Barton & Sandhills	17/00536 /H42	Prior approval not required
27 February 2017	Bulan Road	96	OX3 7HX	Lye Valley	17/00508 /H42	Prior approval not required
01 March 2017	Lewis Close	2	OX3 8JD	Quarry & Risinghurst	17/00537 /H42	Prior approval not required
23 February 2017	Colwell Drive	17	OX3 8XD	Barton & Sandhills	17/00411 /H42	Prior approval not required
10 February 2017	Crotch Crescent	38	OX3 0JJ	Marston	17/00361 /H42	Prior approval not required
31 January 2017	*Everard Close*	*1*	*OX3 7NB*	*Churchill*	*17/00259 /H42*	*Application withdrawn*
10 January 2017	Pauling Road	17	OX3 8PU	Churchill	17/00069 /H42	Prior approval not required