

Headington Neighbourhood Forum Response to Oxford Local Plan 2040 Consultation January 2024.

Headington Neighbourhood Forum is a statutory consultee and makes the following response to the consultation.

Neighbourhood Planning

While the infrastructure development plan refers to the benefits of Neighbourhood Plans signalling infrastructure needs Neighbourhood Plans in Oxford are not included in the list of key documents considered in the preparation of the Infrastructure Delivery Plan which is a key element of the Local Plan. There is also very little reference to Neighbourhood Plans in the draft Local Plan 2040.

Commented [AA1]: General comments on plan

Policy SPE 19 Ruskin Field

Headington Neighbourhood Plan *Policy HCG1 Key Worker Housing* seeks to encourage the development of key worker housing policies in the Local Plan. We request that any development at Ruskin Fields (Policy SPE Ruskin Field) is for the provision of housing for healthcare key workers in Headington.

Commented [AA2]: SPE19 unsound: - not effective

Policy SPE 7 Nuffield Orthopaedic Centre

Headington Neighbourhood Plan Policy GSC1 Protecting Green Spaces seeks to protect the Lye Valley as a key Site of Special Scientific Interest in Headington. We note that several policies (SPE 7 Nuffield Orthopaedic Hospital; SPE 8 Warneford Hospital; SPE 14 Slade House) seek to protect the water systems which feed the Lye Valley. We suggest that this would be best achieved through the provision of supplementary planning guidance for the Lye Valley and its water catchment. We consider that this will assist the delivery of two other key policies of the Headington Neighbourhood Plan as follows:

Commented [AA3]: Policy G1: unsound - not effective

1. Policy GSP1 Conserving and Enhancing Public Access Green Spaces. Lye Valley is identified as a public access green space (HNP Appendix A ref 22). As such Policy GSP1 should be applied when considering development proposals which may affect this site. The policy requires that the site is conserved and where appropriate enhanced. A report by the Friends of Lye Valley (2021) sets out the measures needed to conserve and enhance the site through the restriction of development within the catchment. This would be enforced through the application of supplementary guidance for the Lye Valley and its water catchment.

2. Policy GSP3 Conserving and Enhancing Biodiversity requires that there will be a presumption against development proposals which may result in significant harm to sites and/or species of ecological value. Lye Valley is a Site of Special Scientific Interest and as such is of considerable ecological value so Policy GSP3 applies. This would be effectively enforced through the application of supplementary guidance for the Lye Valley and its water catchment.

Policy C2: Maintaining Vibrant Centres

Headington Centre Improvement Plan (HCIP) when implemented will deliver the elements of a vibrant centre as set out in Policy C2 Maintaining Vibrant Centres. We are pleased to note that the HCIP is included as part of the Infrastructure Delivery Plan. However only the transport element of the HCIP is included in the Plan Schedule. **We request that the public realm projects which form part of the HCIP are also specifically included in the Schedule.**

Commented [AA4]: IDP

Funding Infrastructure

Delivery of the necessary infrastructure which underpins the Local Plan relies largely on funding from CIL and/or Section 106 sources. The major development sites in Headington are the Universities and the Hospital Trusts both of which appear to be exempt from CIL through their charitable status. Most recently the Clive Booth Student Village claimed such charitable exemption and as a consequence were not required to pay the estimated £3m CIL charge. **We request that the process of obtaining funding from developers to offset the impact of their development is examined and where appropriate Section 106 conditions rather than CIL regulations are applied at the planning negotiation stage.**

Commented [AA5]: refer to CIL consultation