

OXFORD LOCAL PLAN 2040 – RESPONSE – Part 1



Headington Heritage
Saving Headington's Heritage
A Personal Blog

<http://headingtonheritage.org.uk>

*This response should be read alongside
response to the Ruskin Campus and Field
response. (Part 2)*

Table of Contents

OXFORD LOCAL PLAN 2040 – RESPONSE – PART 1	1
GENERAL COMMENTS.....	7
INEFFECTIVE LANGUAGE AND OBJECTIVES ARE NOT SET	7
REPETITION IN SITE AND AREA POLICIES OF GENERAL POLICIES	7
SITES NOT UP-TO-DATE.....	7
PLANS CONFUSED WITH EXECUTION.....	8
POLICY MAP BLUNDERS	8
CHAPTER 1 – SPATIAL STRATEGY.....	8
POLICY S1 - SPATIAL STRATEGY	8
Policy S1: Modification Requested.....	8
POLICY S2: DESIGN CODE AND GUIDANCE.....	8
Policy S2: Modification Requested.....	8
POLICY S3 – INFRASTRUCTURE DELIVERY	8
Policy S3: Modification Requested.....	9
POLICY S4 – VIABILITY	9
CHAPTER 2 – INCLUSIVE CITY.....	9
POLICY H1: HOUSING REQUIREMENT	9
HENA REPRESENTATIONS	9
EXCLUSION OF SITES UNDER 10 HOUSES (HENA).....	9
Policy H1: Modification Requested	10
POLICY H3: AFFORDABLE HOUSING CONTRIBUTIONS FROM NEW PURPOSE-BUILT STUDENT ACCOMMODATION.....	10
Policy H3: Modification Requested	10
POLICY H5: EMPLOYER-LED HOUSING	10
Policy H5: Modification Requested	10
POLICY H6: MIX OF DWELLING SIZES	11
Policy H6: Modification Requested	11
POLICY H7: DEVELOPMENT INVOLVING LOSS OF DWELLINGS.....	11
POLICY H8: HMO.....	11
POLICY H9: LOCATION OF NEW STUDENT ACCOMMODATION	11
Policy H9: Modification Requested	11
POLICY H10: LINKING NEW ACADEMIC FACILITIES WITH THE ADEQUATE PROVISION OF STUDENT ACCOMMODATION	11
CHAPTER 3 – A FAIR AND PROSPEROUS CITY.....	11
POLICY E1: EMPLOYMENT STRATEGY	11

POLICY E3: AFFORDABLE WORKSPACE	12
POLICY E4: COMMUNITY EMPLOYMENT AND PROCUREMENT PLANS	12
CHAPTER 4 – GREEN BIODIVERSE CITY.....	12
G1-G9 – GENERAL	12
GENERAL - G1-G9 SUMMARY	12
OLP2040 GREEN SPACE ON POLICY MAP/ALLOCATIONS.....	13
Green Infrastructure Surveys 2007/2020.....	13
Green Space Mapping Errors - Examples	13
Policy Map Example - Old Headington and John Radcliffe Hospital Green.....	14
Policy Map Example - Lye Valley	15
Policy Map Example - Town Furze Estate.....	16
G1-G9 General - Playgrounds.....	16
Population Increase.....	16
Inclusion of Large Developments on Oxford’s Boundary Required	16
Policy G1-G9: General Modifications Requested	17
POLICY G1 – PROTECTION OF THE GREEN INFRASTRUCTURE	18
Reprovisioning.....	18
G1 - Green Space Policy v. Residential Gardens.....	18
Policy G1 Modification Requested	18
POLICY G4 – NET GAIN IN BIODIVERSITY	18
Policy G4 – Modification Required.....	18
POLICIES G6/G7/G8: PROTECTING OXFORD’S BIODIVERSITY & FLOOD RISK/SUDS	18
LYE VALLEY AND CALCAREOUS/PEAT AREAS	19
Policy G6/G7/G8 Modification Requested	20
CHAPTER 5 – CITY THAT UTILISES RESOURCES WITH CARE.....	21
POLICY R1: NET ZERO	21
POLICY R2: EMBODIED CARBON.....	21
R4 – AIR QUALITY (INCLUDING CLIMATE CHANGE AND CARBON).....	21
Policy R4- Headington Hospitals Parking Provision (and Others).....	22
R4 - Modification Requested.....	24
POLICY R6: SOIL QUALITY	24
R6 - Modification Requested.....	24
POLICY R7: AMENITY.....	24
R7 - Modification Requested.....	24
CHAPTER 6 – CULTURE AND HERITAGE.....	24
POLICY HD1: - CONSERVATION AREAS	24
Policy HD1: Modification Requested.....	25
POLICY HD7: - PRINCIPLES OF HIGH QUALITY DESIGN.....	25
Policy HD7: Modification Requested.....	25

POLICY HD8: USING CONTEXT TO DETERMINE APPROPRIATE DENSITY.....	25
Policy HD8: Modification Requested.....	25
POLICY HD9: - VIEWS AND HEIGHTS	25
Policy HD9: Modification Requested.....	25
POLICY HD10: - HEALTH IMPACT ASSESSMENT	26
Policy HD10: Modification Requested.....	26
CHAPTER 7 – A LIVEABLE CITY	26
POLICY C1: TOWN CENTRE USES	26
Policy C1: Modification Requested	26
Policy C1: Modification Requested	26
POLICY C2: MAINTAINING VIBRANT CENTRES	26
Policy C2: Modification Requested	26
POLICY C4: PROTECTION, ... AND NON-RESIDENTIAL INSTITUTIONS	26
Policy C4: Modification Requested	26
POLICY C6: TRANSPORT ASSESSMENTS, TRAVEL PLANS AND SERVICE AND DELIVERY PLANS	26
Policy C6: Modification Requested	26
POLICY C8: MOTOR VEHICLE PARKING DESIGN STANDARDS	27
Policy C8: Modification Requested	27
CHAPTER 8 – DEVELOPMENT SITES, AREAS OF FOCUS AND INFRASTRUCTURE.....	27
CHAPTER 8 - NORTH INFRASTRUCTURE AREA.....	27
POLICY SPN1– NORTHERN GATEWAY.....	27
SPN1 – Modification Required	27
POLICY SPN2: OXFORD UNIVERSITY PRESS SPORTS GROUND.....	27
SPN2 – Modification Required	27
CHAPTER 8 - SOUTH INFRASTRUCTURE AREA	27
POLICY SPS1: ARC OXFORD	27
POLICY SPS2: KASSAM STADIUM AND OZONE LEISURE PARK/SPS3.....	27
POLICY SPS4: MINI PLANT OXFORD AND SPE7: UNIPART (BUSINESS PARK)	27
SPS4/SPS7 – Modification Required.....	28
POLICY SPS6: SANDY LANE RECREATION GROUND	28
SPS6 – Modification Required	28
POLICY SPS8: BERTIE PLACE RECREATION GROUND.....	28
SPS8 – Modification Required	28
POLICY SPS10: KNIGHTS ROAD.....	28
POLICY SPS13: LAND AT MEADOW LANE.....	29
POLICY SPS14: FORMER IFFLEY MEAD PLAYING FIELD	29
POLICY SPS15: REDBRIDGE PADDOCK	29
POLICY SPS16: CRESCENT HALL	29

POLICY SPS17: EDGE OF PLAYING FIELDS, OXFORD ACADEMY	29
CHAPTER 8 - EAST INFRASTRUCTURE AREA	29
POLICY MRORAOF: MARSTON ROAD AND OLD ROAD AREA OF FOCUS	29
Policy MRORAOF: Modification Requested.....	30
POLICIES SPE1, SPE2, SPE3 AND SPE4, SPE5(?) – PEAT AND TUFA	30
Policies SPE1, SPE2, SPE3, SPE4: Modification Requested	31
POLICY SPE1: GOVERNMENT BUILDINGS AND HARCOURT HOUSE.....	31
Policy SPE1: Modification Requested.....	31
POLICY SPE2: LAND SURROUNDING ST CLEMENT’S CHURCH	32
Policy SPE2: Modification Requested.....	32
POLICY SPE3: HEADINGTON HILL HALL AND CLIVE BOOTH STUDENT VILLAGE	33
Policy SPE3: Modification Requested.....	33
POLICY SPE4: OXFORD BROOKES UNIVERSITY MARSTON ROAD CAMPUS	33
POLICY SPE5: 1 PULLENS LANE	33
Policy SPE5: Modification Requested.....	33
POLICY SPE6: CHURCHILL HOSPITAL	33
Parking Issues.....	33
Policy SPE6: Modification Requested.....	34
MISSING POLICY: OXFORD BROOKES UNIVERSITY CAMPUS	34
MISSING POLICY: OLD ROAD CAMPUS	34
MISSING Policy: Modification Requested	34
MISSING POLICY: VALENTIA ROAD (HELAA 329) (NONE)	34
Policy: Modification Requested	34
MISSING POLICY – COOLRIDGE CLOSE (HELAA 622) (NONE)	34
Policy: Modification Requested	35
MISSING POLICY – WOOD FARM HEALTH CENTRE (HELAA 629) (NONE)	35
Policy: Modification Requested	35
POLICY SPE7: NOC.....	35
Policy SPE7: Modification Requested.....	35
POLICY SPE8: WARNEFORD HOSPITAL.....	35
Policy SPE8: Modification Requested.....	35
POLICY SPE9: BAYARDS HILL PRIMARY SCHOOL PART PLAYING FIELDS.....	35
Policy SPE9: Modification Requested.....	35
POLICY SPE10: HILL VIEW FARM.....	36
POLICY SPE11: LAND WEST OF MILL LANE	36
POLICY SPE12: MARSTON PADDOCK	36
POLICY SPE13: MANZIL WAY	36
Policy SPE13: Modification Requested.....	36

POLICY SPE14: SLADE HOUSE	36
Policy SPE14: Modification Requested.....	36
POLICY SPE15: THORNHILL PARK.....	36
POLICY SPE16: UNION STREET CAR PARK	36
Policy SPE16: Modification Requested.....	36
POLICY SPE17: JESUS AND LINCOLN COLLEGE SPORTS GROUNDS	37
Policy SPE17: Modification Requested.....	37
POLICY SPE18: RUSKIN COLLEGE CAMPUS AND POLICY SPE19: RUSKIN FIELD.....	37
POLICY SPE20: JOHN RADCLIFFE HOSPITAL.....	37
PARKING.....	37
Flooding.....	38
Heritage.....	38
Policy SPE20: Modification Requested.....	39
WEST CENTRAL INFRASTRUCTURE AREA	40
APPENDICES.....	41
APPENDIX – POLICY H1 – HENA	41
OBJECTION TO HOUSING AND ECONOMIC NEEDS ASSESSMENT, CHERWELL DISTRICT AND OXFORD CITY COUNCILS	41
SUMMARY	41
DEMOGRAPHIC ANALYSIS	41
KEY WORKERS, LECTURERS, RESEARCHERS AND STUDENTS - CHARACTERISTICS	42
REPORT DEMOGRAPHIC ANALYSIS FAILURES	42
DATA COLLECTION SURVEY	42
HOUSING CREATED BY INFILL	43
CONCLUSIONS.....	43
HOUSING AND DWELLINGS REQUIREMENTS	43
INCORRECTLY ASSESSED HOUSING NEED	43
FITNESS FOR PURPOSE.....	44
APPENDIX – THE LYE VALLEY	44
LYE VALLEY SSSI – AN INTRODUCTION	44
KEY POINTS.....	45
LYE VALLEY CATCHMENTS OVERVIEW	46
A SET OF NATURAL GROUND WATER CATCHMENTS (GREEN).....	47
A SET OF SURFACE WATER CATCHMENTS (BLUE)	49
ARTIFICIAL THAMES WATER STORM WATER CATCHMENT (ORANGE)	49
THE SOUTH FEN CATCHMENT	50
FLOWS OVERVIEW - GENERAL.....	50

PRE-DEVELOPMENT FLOWS (EXAMPLE)	51
POST-DEVELOPMENT FLOWS	52
SURFACE FLOWS – SOUTH FEN EXAMPLE	53
POLICY – LAMBERTH RECOMMENDATIONS.....	53
CAN SUDS/SOAKAWAY DESIGN BE A CONDITION?.....	53
FEN FRAGILITY AND VULNERABILITY	53
APPENDIX – POPULATION AND GREEN SPACE PER RESIDENT	57

GENERAL COMMENTS

Ineffective Language and Objectives Are Not Set

A Plan 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.

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 the baseline is not given, 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?

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.

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 OLP2040 *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 – SPATIAL STRATEGY

POLICY S1 - SPATIAL STRATEGY

Is *Ineffective* as it is mostly aspirational as it will accept any development anywhere regardless if it meets the criteria. It not a policy but a *fluffy* wishlist, ALL development will generally be a net negative for resident amenity even if it has positives such a housing provision.

Policy S1: Modification Requested

Move to background explanatory text, it is simply waffle.

POLICY S2: DESIGN CODE AND GUIDANCE

The following policy is muddled as statutory duties are as below anyway, and implies English Heritage listed assets will not be protected.

In recognition of the significance of Oxford's heritage, and as part of its positive approach to the historic environment, in addition to fulfilling its statutory duties, the Council will:

1. a) *identify, conserve and enhance local heritage assets*

Design guidance is not a material consideration unless backed up with an Article 4 restriction.

What is a “*positive strategy*”? It is simply waffle.

Policy S2: Modification Requested

Move to background explanatory text, it is simply waffle. Replace *should* with *must* to make it *effective*.

POLICY S3 – INFRASTRUCTURE DELIVERY

The proposal “*Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL [Cowley Branch Line] stations will be expected*” is not enforceable as it does not wholly and exclusively relate to the development and would not be *justified*, especially for householder applications. BMW for example (at the end of the line) may benefit but so may others who use it as a transit point to go to Oxford Central.

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.

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

The policy to build 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

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>

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 sites listed below (eg: Policy XXX etc) are in their relevant sections 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.

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.

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.

POLICY H5: 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 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 H5: Modification Requested

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

General housing should be allowed. A contribution to housing stock is valuable however delivered, and should be determined by the landowner.

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 H6: MIX OF DWELLING SIZES

Policy H6: Modification Requested

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

POLICY H7: DEVELOPMENT INVOLVING LOSS OF DWELLINGS

This policy is *ineffective* as it does not cover abandoned or vacant properties. (or a policy is missing)

POLICY H8: HMO

“*Unrelated individuals*” is not explained, does this mean a family with two unconnected students must now be classified as an HMO? This would be *ineffective* as it would have a negative effect on student housing provision, discouraging families from renting bedrooms.

POLICY H9: 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 H9: Modification Requested

Restrictions on bringing cars to Oxford.

Removal of identity of applicant clause.

POLICY H10: 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.

CHAPTER 3 – A FAIR AND PROSPEROUS CITY

POLICY E1: EMPLOYMENT STRATEGY

The policy is *unjustified* as there is no provision 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 E3: 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.

POLICY E4: COMMUNITY EMPLOYMENT AND PROCUREMENT PLANS

Unjustified, as too much government interference in the operation of business.

CHAPTER 4 – GREEN BIODIVERSE CITY

G1-G9 – GENERAL

GENERAL - G1-G9 SUMMARY

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 not marked or protected
- 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.
- 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
- Playgrounds are not marked

OLP2040 GREEN SPACE ON 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 OLP2040 and informing the Policy Map, is wholly deficient, factually wrong, presenting derived, and incorrect, information without explanation or evidence:

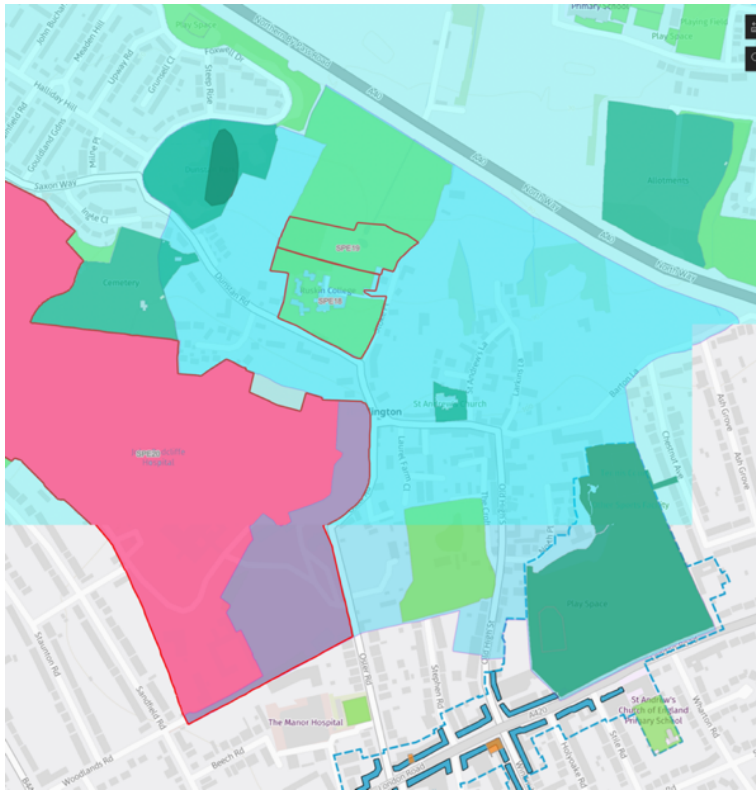
- Relying on cut and paste methodology and text, with a fundamentally flawed methodology and data.
- The unscientific and illogical green space marking can be shown below, comparing policy map green space with actual provision.
- For example GIS Fig 13, has too many errors to even list and GIS Fig 14 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 OLP2040 Policy Map.

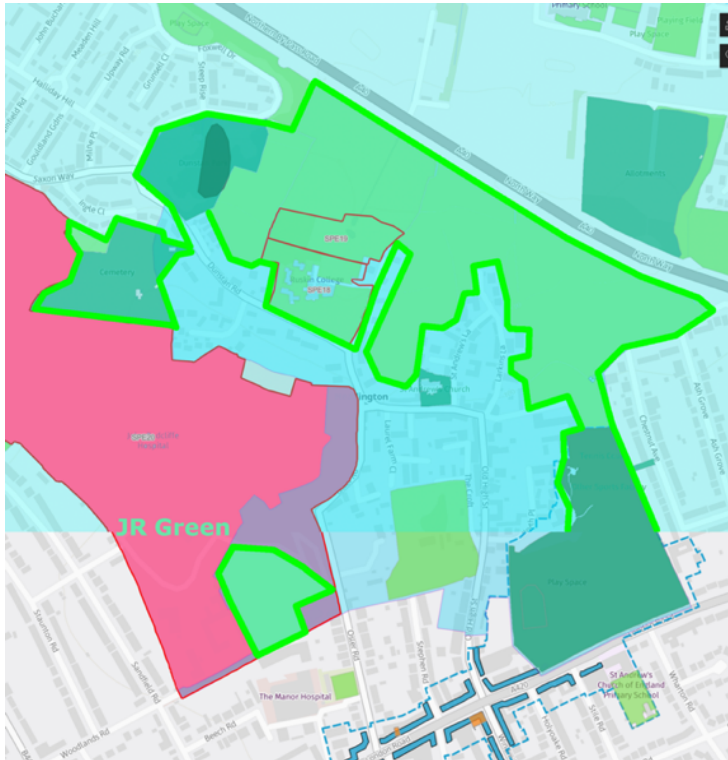
Green Space Mapping Errors - Examples

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

Policy Map Example - Old Headington and John Radcliffe Hospital Green



Old Headington Green Space : Local Plan Policy Map Designation – Incorrect



Old Headington – Actual Green Space

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 SPE20 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

Inconsistent inclusions are:

- Ruskin Fields, north of SPE18/19
- Headington House garden, west of The Croft, wholly invisible behind a high wall, and inaccessible.

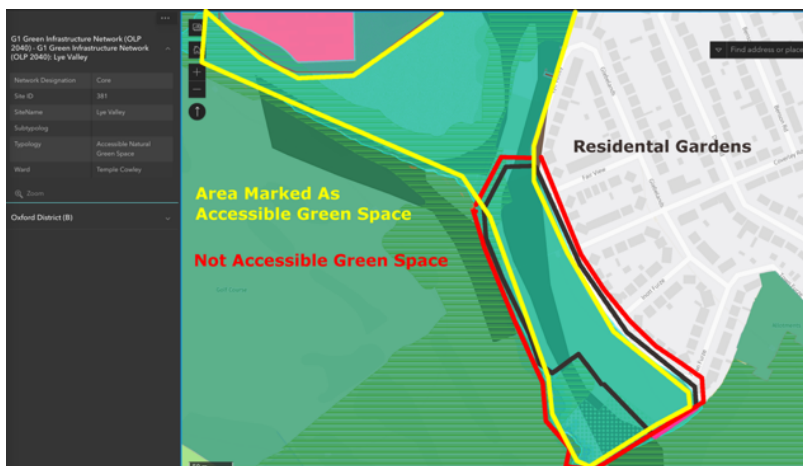
The map shows the "Green Belt" of Old Headington:



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:



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.

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 residential garden building in policy G1
- G1 - para b) is entirely redundant.

Policy G1 Modification Requested

- Clarification that green space designation is more important than either residential garden policies, or Local Plan allocation either as Area of XXX 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

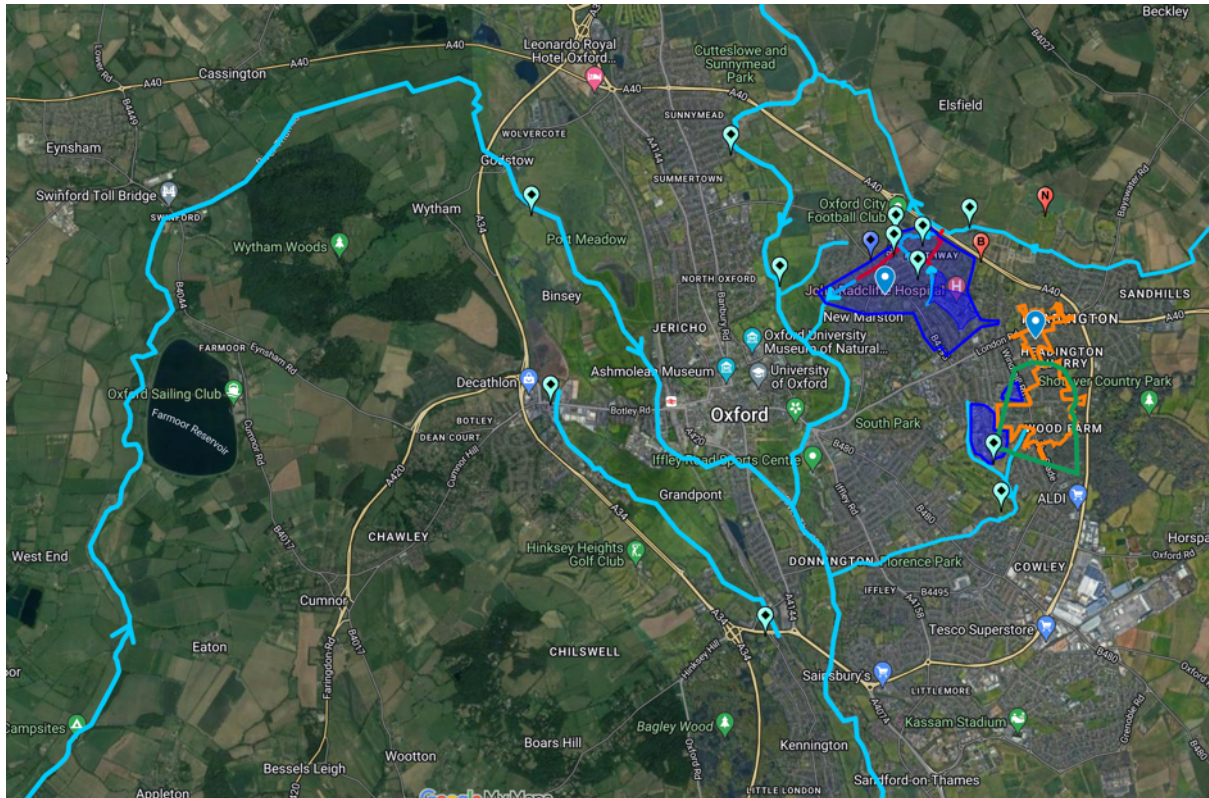
POLICY G4 – NET GAIN IN BIODIVERSITY

Policy G4 – Modification Required

Must include provision for where the habitat is NOT swappable, it is not permitted.

POLICIES G6/G7/G8: PROTECTING OXFORD’S BIODIVERSITY & FLOOD RISK/SUDS

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, yet it is not even acknowledged, Para 4.43 is simply wrong.



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 occur 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

Policies are **ineffective** as protections for the Lye Valley and areas where groundwater and surfacewater flows of paramount importance are only mentioned in passing in the supporting text, not the policy itself, this is a very considerable weakening from the current Local Plan 2036. (Policies RE3/RE4) G6 is ineffective as it does not provide mapping of the area where groundwater must be protected.

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 (SPE18/19), Dunstan Park and other adjacent areas are at risk from increasing development leading to reduced groundwater, and increased scouring from surfacewater via urban drainage.

IMPORTANT: Please refer to Appendix - Lye Valley.

Policy G6/G7/G8 Modification Requested

The following modifications are required:

- Replacement of “*mitigation*” with “*net-zero*” or greenfield run off in ALL zones.
- Replace the ***ineffective*** “*considered*” with must met net-zero/greenfield runoff.
- A proportional FRA for ALL zones including offsite cumulative risk
- ALL development to produce net-zero runoff with improvement required to stop downstream flooding
- Acknowledgement that urbanisation is a major cause of downstream flooding
- A Grampian condition for all development in Oxford to ensure Thames Water can manage surface runoff
- 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
- Legal action where flooding caused by excessive runoff from sites such as from John Radcliffe

For the Lye Valley and areas above the following modifications are required:

- Formal survey and policy demarcation of ground, Thames Water and surfacewater catchments for the Lye Valley and other areas as per Lambeth where floods can, and have, damaged important environments such as the Lye Valley SSSI.
- 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.
- Article 4 Direction to abrogate permitted development rights in both groundwater and surfacewater catchment areas of the Lye Valley 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
- Statement “*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*” to apply to ALL development in the catchments above not just specific development sites, extension to other land designations (LNR, LWS etc)
- Update to all Site Policies that impact the Lye (MROFAOF, SPE7, SPE6, SPE8)
- 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.
- G6 - Proposals with a reasonable likelihood of adversely impacting **semi-natural** habitats requires rewriting as it excludes natural habitats.

CHAPTER 5 – CITY THAT UTILISES RESOURCES WITH CARE

POLICY R1: NET ZERO

The policy is not *justified* an ineffective as it is forcing householders (condition 4) to heat their existing homes with gas, but then with an entirely new method (non-gas) for a new extension. An acceptable solution should be to achieve a net improvement, eg: a householder can insulate the rest of the house at the same time as the extension construction.

POLICY R2: EMBODIED CARBON

This policy is *ineffective* as it is not clear whether it applies to buildings in entire Conservation Areas (Designated Heritage Asset)

5.24 *For all existing buildings which are not designated heritage assets, or within the setting of a designated heritage asset,*

R4 – AIR QUALITY (INCLUDING CLIMATE CHANGE AND CARBON)

The policy is *ineffective* as it only addresses air quality, not the wider problems caused by traffic and solutions – this response addresses these here as any policy relating to traffic and its effect on climate change, environment and health:

Actions which seek to reduce and prevent greenhouse gas emissions (climate change mitigation) will be important for contributing to achieving the UK's legislated goals of being net zero by 2050 and limiting emissions in the nearer term in line with the sixth carbon budget. It is also essential for meeting the local target of being a net zero city by 2040, which Oxford set for itself in response to the declaration of a climate emergency in 2019.

In relation to car traffic is entirely absent, therefore the Local Plan is *ineffective* in achieving its stated goals.

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.

Ineffective as the areas of poor air quality are not defined, and largely due to very poor monitor placement even identified, and the causes are not addressed with solutions.

Mitigation must be removed and replaced with “net zero”

5.33 - The whole of the city has been declared an Air Quality Management Area (AQMA)

Ineffective and ambiguous as this only applies to the centre and very small areas around.

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)

John Radcliffe Shifts

- *“Early – 07:30 or 08:00 start, finishing between 12:00 and 14:00.*
- *Late - 12:00 or 13:00 start, finishing between 20:00 and 21:00*
- *Long-Day Combined – 08:00 Start – 21:00 Finish*
- *Day – 07:00 or 08:00 Start, finishing between 16:30 and 18:30*
- *Night – 20:00 to 21:00 start time – Finishing between 07:30 and 08:00.*

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 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 (See XXX)

R6 - Modification Requested

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

POLICY R7: AMENITY

R7 - Modification Requested

Fluffy, define clear rules and metrics.

CHAPTER 6 – CULTURE AND HERITAGE

All policies in this section are confusing method with targets, are **ineffective** and **fluffy**, and where not just regurgitate the NPPF so are pointless.

POLICY HD1: - CONSERVATION AREAS

Fluffy

Conservation Areas 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 a “**substantial public benefit**” so Policy HD1 becomes **ineffective**.

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 HD1: 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** wording such as *responds, considered, informed* to specifics such as *must not etc.*
- Add, (and consult), the Conservation Area Appraisals have not been added to the evidence base as they clearly have never been consulted in this Local Plan

POLICY HD7: - 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 HD7: Modification Requested

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

Table HD1 – not labelled, fix.

POLICY HD8: USING CONTEXT TO DETERMINE APPROPRIATE DENSITY

Policy HD8: Modification Requested

Waffle, **ineffective**. “is informed” is practically meaningless, “does not substantially impact” Para e) “opportunities for net zero carbon design” unrelated to topic, remove, also f) “flood risk”

POLICY HD9: - VIEWS AND HEIGHTS

Policy HD9: 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. See also Ruskin Field SPE19.

POLICY HD10: - HEALTH IMPACT ASSESSMENT

Policy HD10: 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 includes Bury Knowle Park, this **ineffective** and **unjustified** therefore **unsound** as most of the uses are clearly inappropriate for Core Green Space.

Policy C1: Modification Requested

Remove Bury Knowle Park from District Centre.

POLICY C2: MAINTAINING VIBRANT CENTRES

Policy C2: Modification Requested

Ineffective, Waffle. Verbal diarrhoea seems to say everything but nothing, could mean anything, or nothing.

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.

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

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 bureaucratic view of the world, plan=do~~

Policy C6: Modification Requested

b) "...residual .. impact" means?

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**.

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

Waffle that belongs in supporting text, a plan is not a goal.

CHAPTER 8 – DEVELOPMENT SITES, AREAS OF FOCUS AND INFRASTRUCTURE

CHAPTER 8 - NORTH INFRASTRUCTURE AREA

POLICY SPN1– NORTHERN GATEWAY

SPN1 – Modification Required

Non allocation due to traffic, environmental (proximity to SAC) and economic reasons. This is directly next to the A34 the most congested and underspecified arterial route in the country, this will have severe countrywide negative impacts.

POLICY SPN2: OXFORD UNIVERSITY PRESS SPORTS GROUND

SPN2 – Modification Required

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

CHAPTER 8 - SOUTH INFRASTRUCTURE AREA

POLICY SPS1: 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 SPS2: KASSAM STADIUM AND OZONE LEISURE PARK/SPS3

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

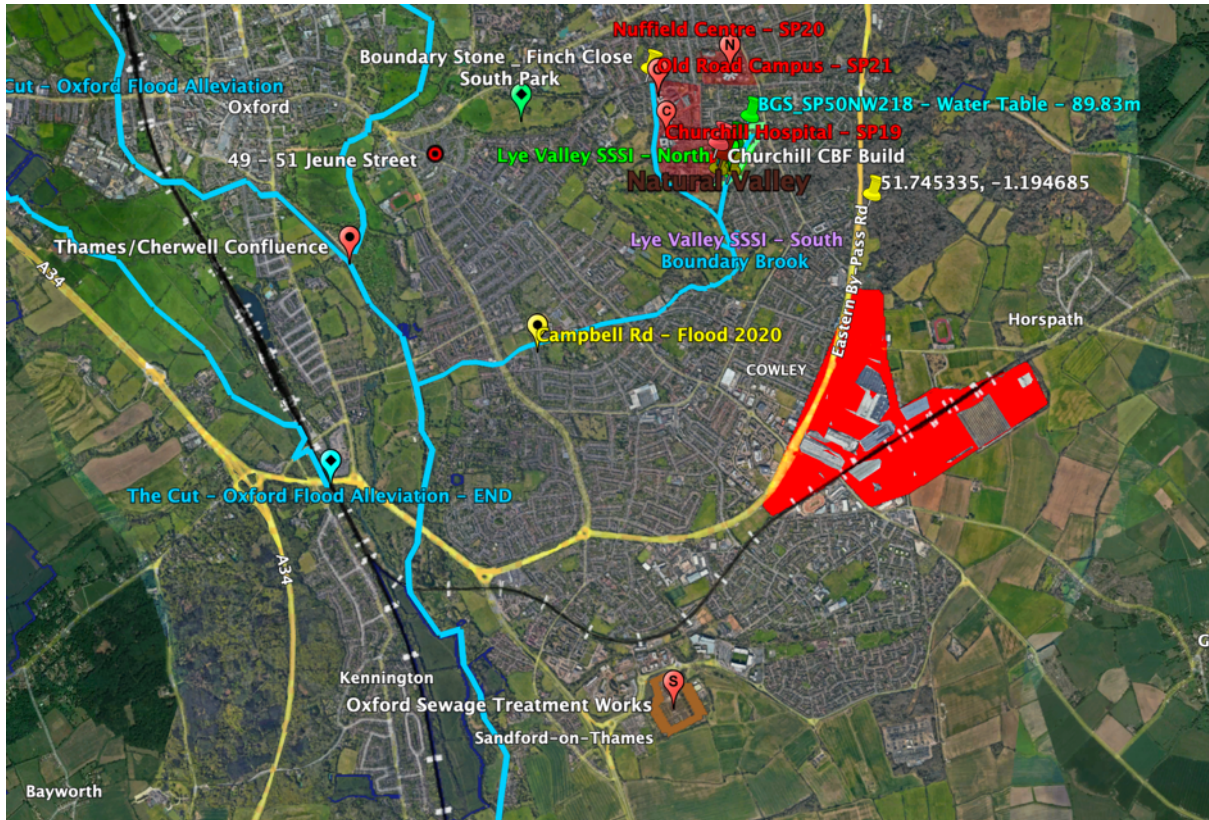
Kiln [533] 2nd century Kiln [518] 3rd century Kiln [573] 4th century

Source_ RPS 1996 OHER 16787 Kiln site

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

POLICY SPS4: MINI PLANT OXFORD AND SPE7: UNIPART (BUSINESS PARK)

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

SPS4/SPS7 – Modification Required

Reduction in surface runoff with SUDS etc.

POLICY SPS6: SANDY LANE RECREATION GROUND

SPS6 – Modification Required

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 SPS8: BERTIE PLACE RECREATION GROUND

SPS8 – Modification Required

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

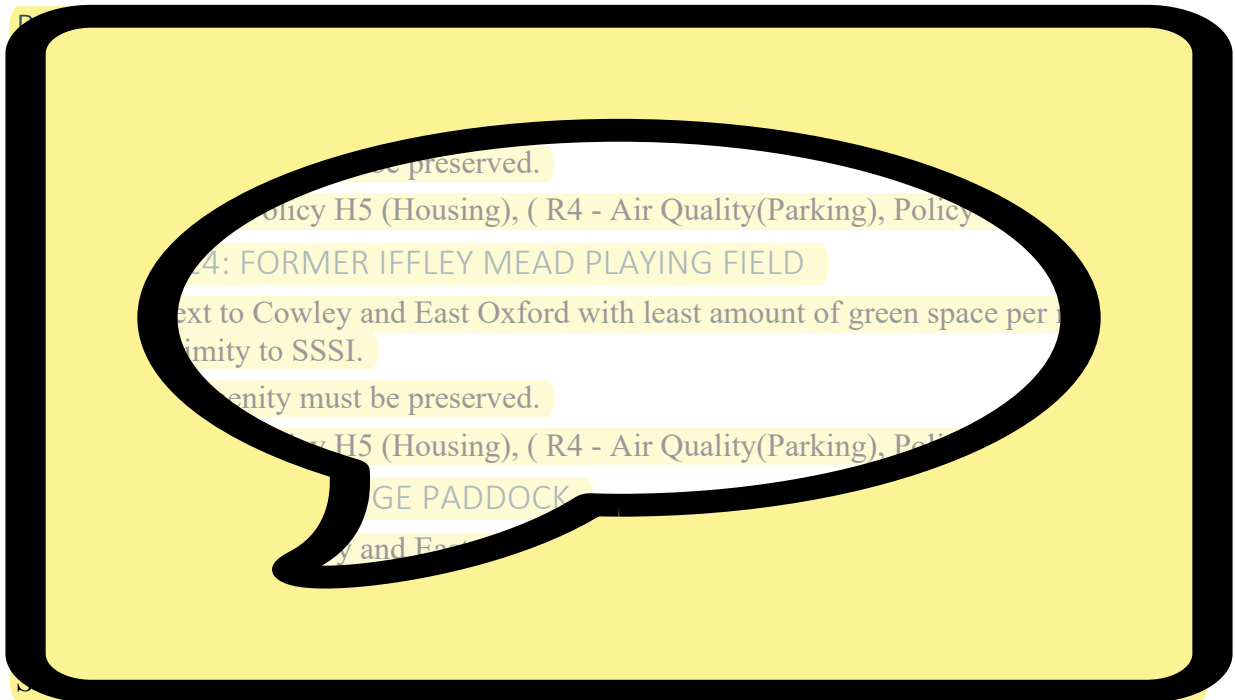
See: Response to Policy H5 (Housing), (R4 - Air Quality(Parking), Policy G1-G9, G6+G7.

POLICY SPS10: KNIGHTS ROAD

Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford, cumulative impact of other developments on green space.

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

Surface flooding will lead to sewage discharge at Oxford Sewage Treatment Works.



POLICY SPS16: CRESCENT HALL

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

POLICY SPS17: EDGE OF PLAYING FIELDS, OXFORD ACADEMY

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 space, 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*”

Likewise, Site Policies call for “**consolidation**” of car parking, this policy calls for a reduction, as each objective can only be pursued on a site by site basic it is worse than **ineffective** it is confused and liable to challenge.

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.

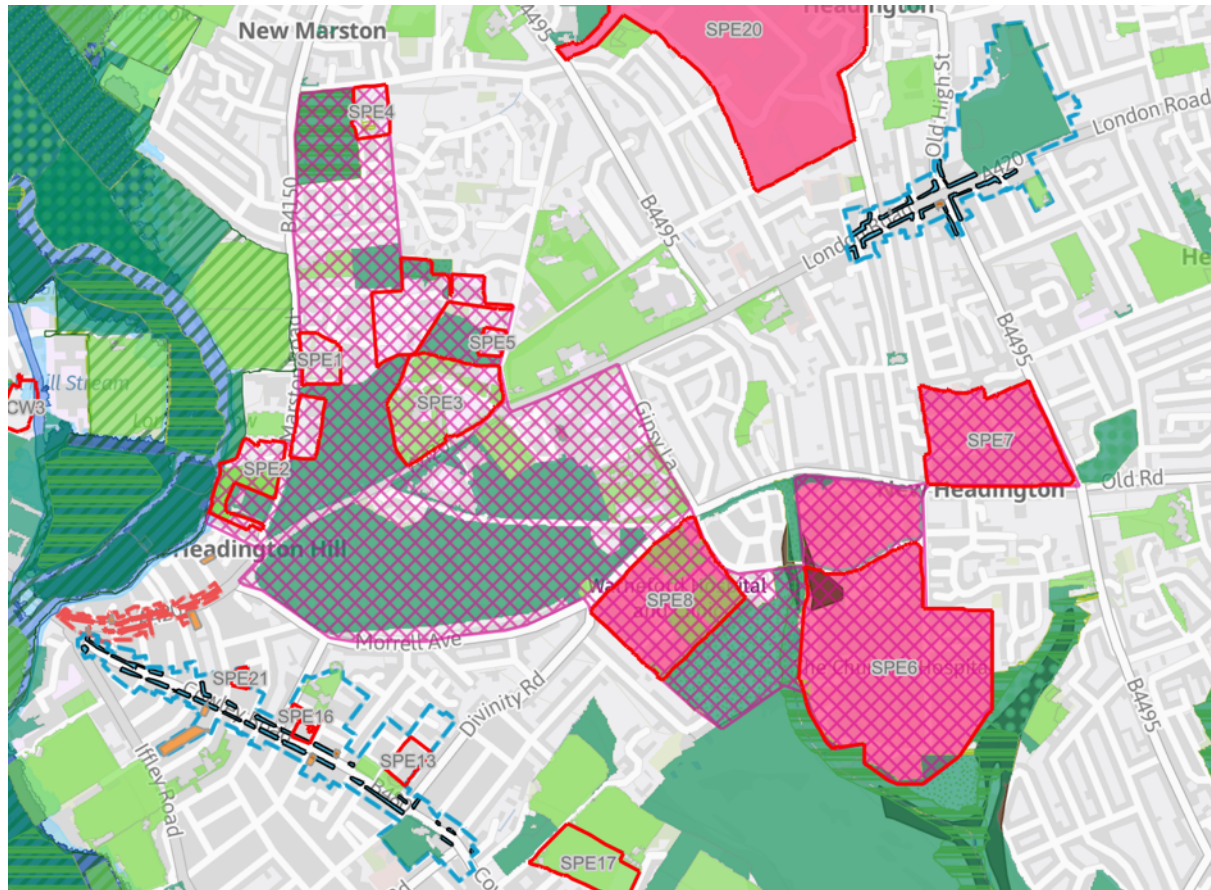
It is extremely difficult to understand the logic of incorporating public green space unless to allow building on green spaces or to privatise it.

Individual Site Allocation policies such as for Oxford Brookes and Old Road Campus which address specific site constraints should not be removed.

a) What is special about South Oxfordshire?

f) – there are few properties on south end of Marston Road, so does this mean building on Headington Hill Park?

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



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

Policy MRORAOF: 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 specific policies for Old Road Campus and Oxford Brookes.

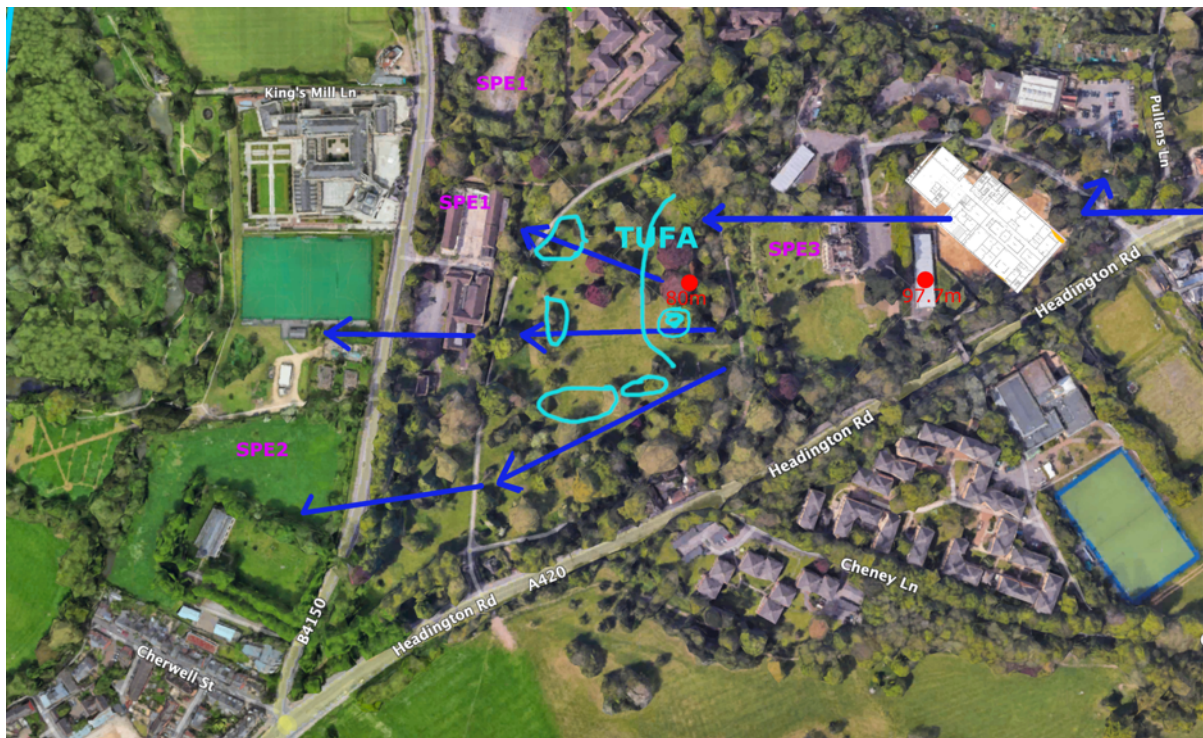
e) – Already rejected by the Inspector as not related to specific development, what is “excess?”

Removal of i) as protection required for all areas in and out of SSSIs such as LNRs, LWSes etc.

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/SPE20), 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**.

POLICIES SPE1, SPE2, SPE3 AND SPE4, SPE5(?) – 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 SPE1, SPE2, SPE3 and SPE4 – TUFA, Peat and Flows

Policies SPE1, SPE2, SPE3, SPE4: Modification Requested

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

POLICY SPE1: GOVERNMENT BUILDINGS AND HARCOURT HOUSE

Waffle.

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

Policy SPE1: Modification Requested

Clarify “reduce” from what? Why not “must”

Removal of “Setting” below for Harcourt House, it is IN the Conservation Area:

Development proposals must have consideration of their impacts on the setting of the Headington Hill Conservation Area,

Ineffective as does not include specific amount of public space.

“however, care should be taken in how entrances are placed to reduce impacts on the green character of the eastern boundary or the setting of the park. “

Must be modified to: *“full screening of the developments from Headington Hill Park with trees, hedges .. is a requirement”* as multiple sides of the developments can impact on the seclusion of the park.

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

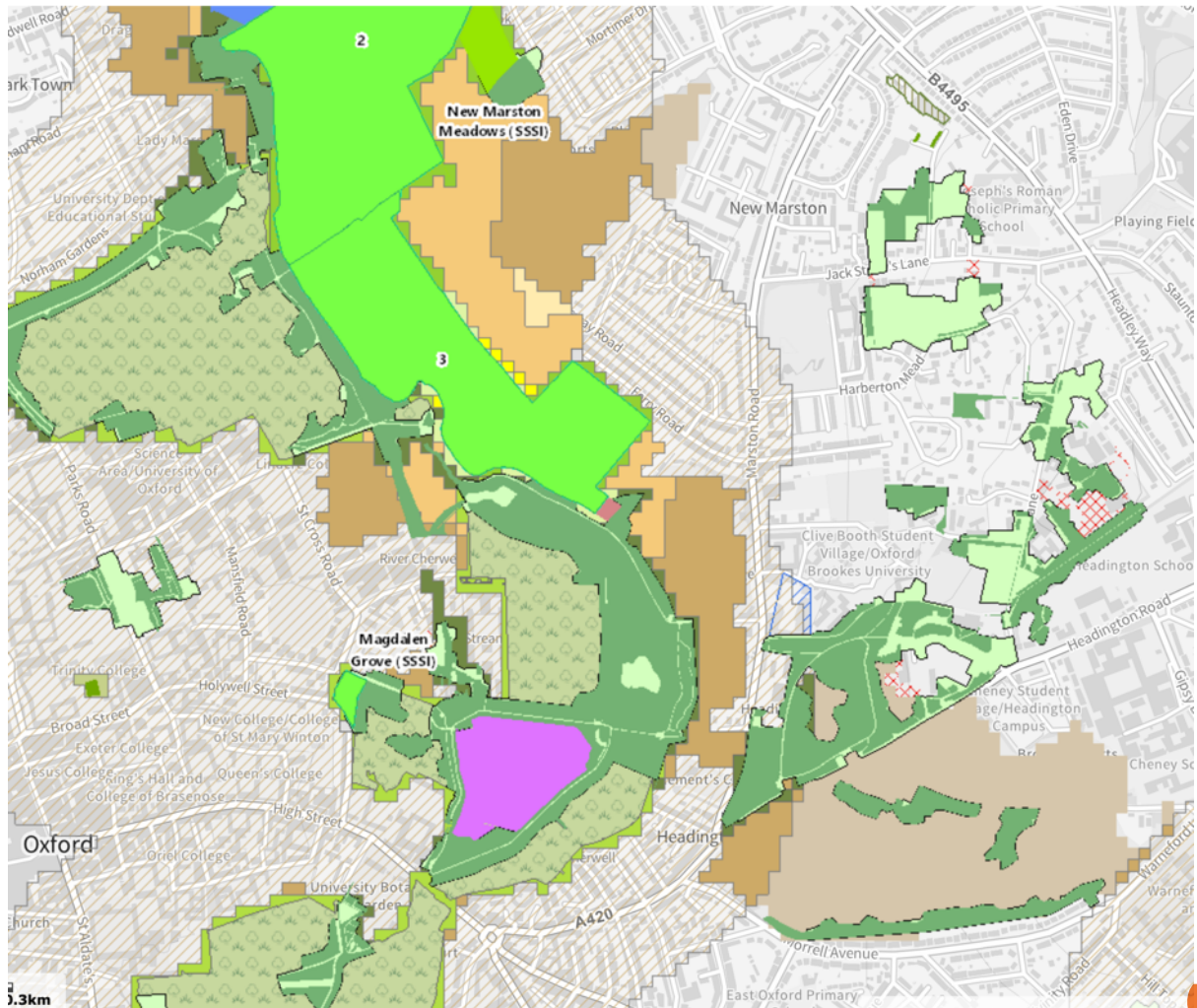
Cuckoo Lane end of northern part is on the old Oxford City boundary, one stone survives, there may be 1-2 on this site buried, a watching brief is required.

POLICY SPE2: 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 SPE2: 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.

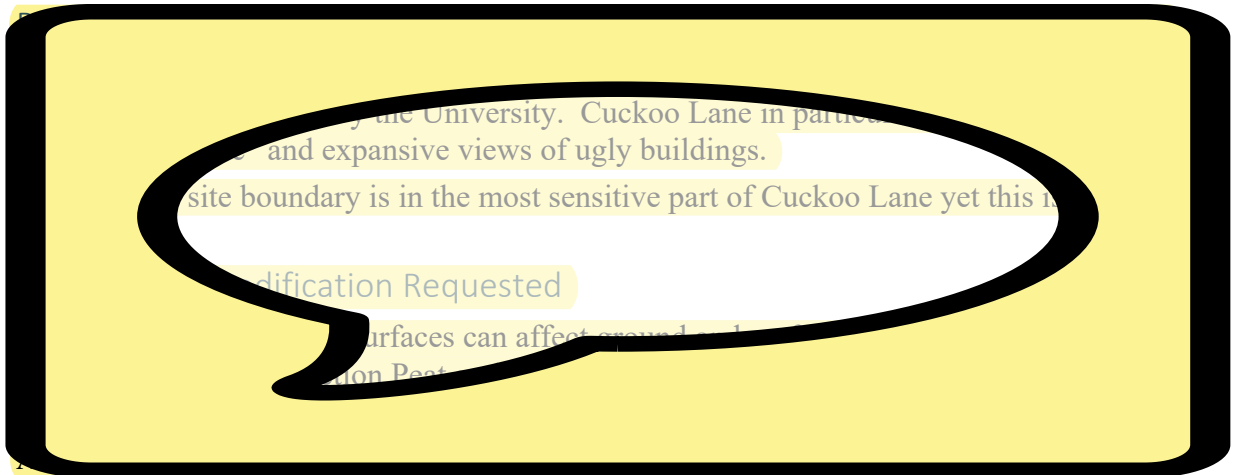
Parking should be kept in the public realm where possible and could be located close to the Marston Road

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 and will increase downstream flooding.

Section Peat and Tufa above.



POLICY SPE4: OXFORD BROOKES UNIVERSITY MARSTON ROAD CAMPUS

Waffle. No indication as to why SUDS are required here and not elsewhere, the Marston SSSI impact zone is a very wide area.

POLICY SPE5: 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 residential character, and tranquillity.

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

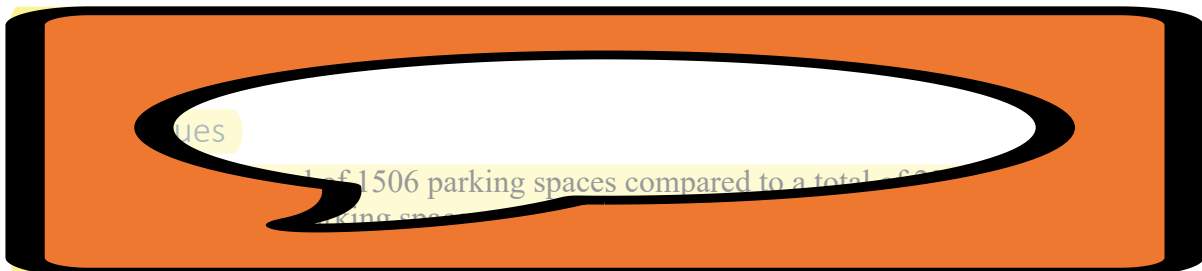
The area north of Cuckoo Lane was identified in 1973 as an area in which the development of institutions should be restricted in order to protect the architectural and spatial characteristics of the area and to prevent the growth of traffic. In 1977 this distinction between the north and southern part 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 SPE5: Modification Requested

Removal of policy from local plan.

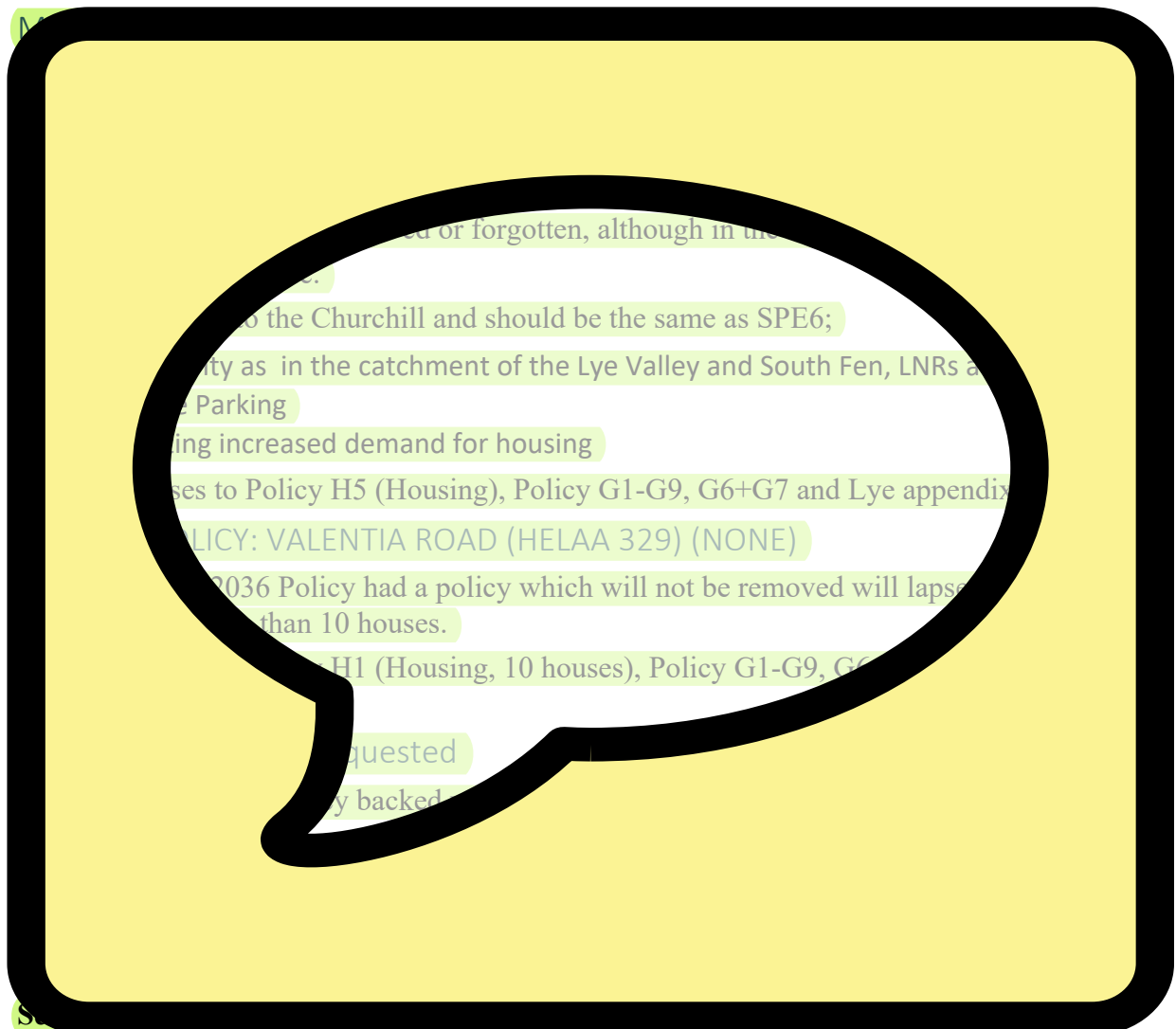
Possible Peat/Tufa issues with foundations crushing flows, survey required.

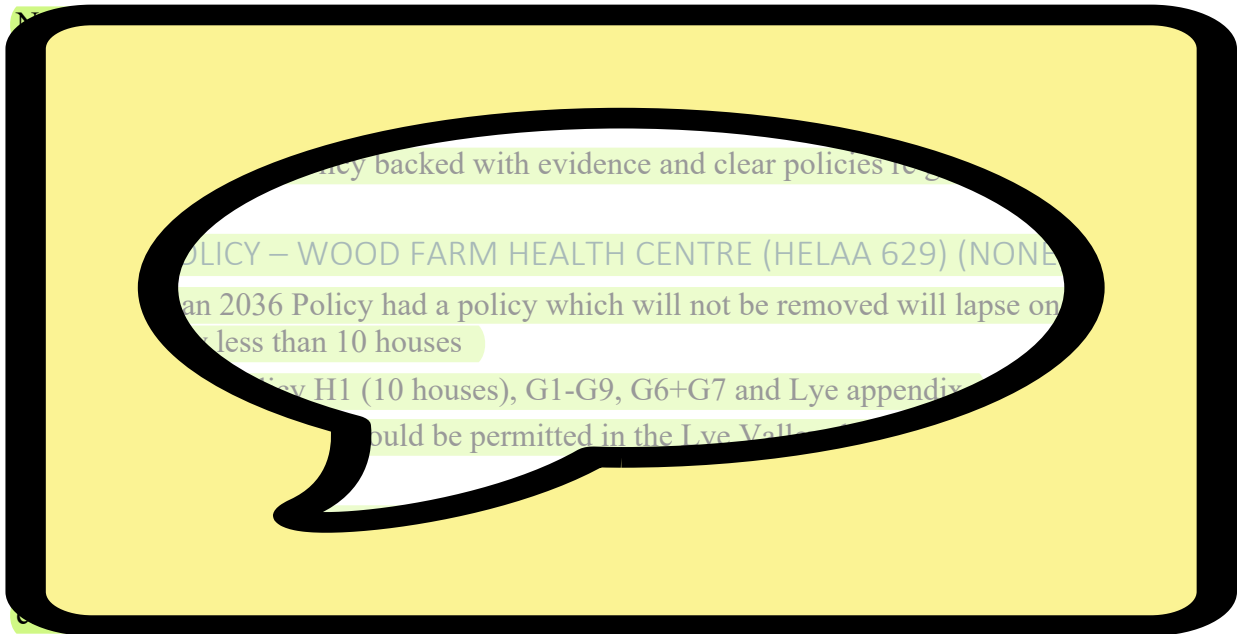


Policy SPE6: Modification Requested

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

- *Policies G1 and G3 ... Policy G5 .. G2 requires...* It is expected that those requirements will be met in the following ways are NOT relevant to SSSI – this is G6 and G7.
- 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.
- Reduce parking in exchange for further development as discussed (Response R6 – Air Quality)
- *“issues including parking are considered in a comprehensive way to make the most efficient use of land.”* Amend to: *“in a comprehensive way to make the most efficient use of land, address the climate crisis and realise essential health, social and environmental benefits.”*
- *“A buffer zone should be provided during the construction period to avoid disturbance to the adjacent SSSI.”* Add *“in operational phase”*
- *because of the use as a hospital some areas of potential contamination are present on the site – mostly caused by asbestos and WWII contaminants, not hospital use.*
- WWII buildings and assets must be identified and retained.





POLICY SPE7: NOC

Waffle

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

Policy SPE7: Modification Requested

See: SPE6 (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.

POLICY SPE8: WARNEFORD HOSPITAL

Waffle

Policy SPE8: Modification Requested

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

POLICY SPE9: BAYARDS HILL PRIMARY SCHOOL PART PLAYING FIELDS

See: (R4 - Air Quality(Parking), Policy G1-G9, G6+G7

This is **unjustified** as Barton:

- Is the most green space deprived suburbs in Oxford, Barton Park even worse
- Will be surrounded by Land North of Bayswater Brook development (1500 houses)
- Lose green space and add residents via the Sandhills Field Development (150 houses)

Is **ineffective** as:

- Is too close to the A40 for health
- There is nowhere to re-provision to in Oxford

Policy SPE9: Modification Requested

Refuse allocation

POLICY SPE10: HILL VIEW FARM

Ineffective – already allocated, application approved.

POLICY SPE11: LAND WEST OF MILL LANE

Ineffective – already allocated, application approved.

POLICY SPE12: MARSTON PADDOCK

Ineffective – already allocated, application approved.

R



R

POLICY SPE15: THORNHILL PARK

Ineffective already approved.

POLICY SPE16: UNION STREET CAR PARK

There aren't any trees on the southern boundary.

The policy **ineffective** as it basically says nothing at all, **waffle**, and is **unjustified** as there is no data backing up the allocation policy.

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.

Policy SPE16: Modification Requested

Study to determine best use of site before site allocation prior to new policy.

POLICY SPE17: 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 SPE17: Modification Requested

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

POLICY SPE18: RUSKIN COLLEGE CAMPUS AND POLICY SPE19: RUSKIN FIELD

See separate submission. (Part 2)

POLICY SPE20: JOHN RADCLIFFE HOSPITAL

Parking

See: SPE6 (Churchill), 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

The following is *ineffective, waffle*, 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 statement multi-storey car parking should replace surface parking rather than enforce a reduction:

Development of the site should be undertaken as part of a masterplan to ensure all land use issues including parking are considered in a comprehensive way to make the most efficient use of land.

Surface level parking dominates the site. Consolidating and rationalising the level of car parking on the site

The Council seems to accept the absurd stance of the OUHT that queues to park cars justifies more or same car parking spaces:

Congestion at the site entrance has been identified as an issue as has the demand for parking which is accommodated across the site at surface level.

The queues are created 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.

Flooding

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)

Mitigation is NOT sufficient, reduction Must be enforced:

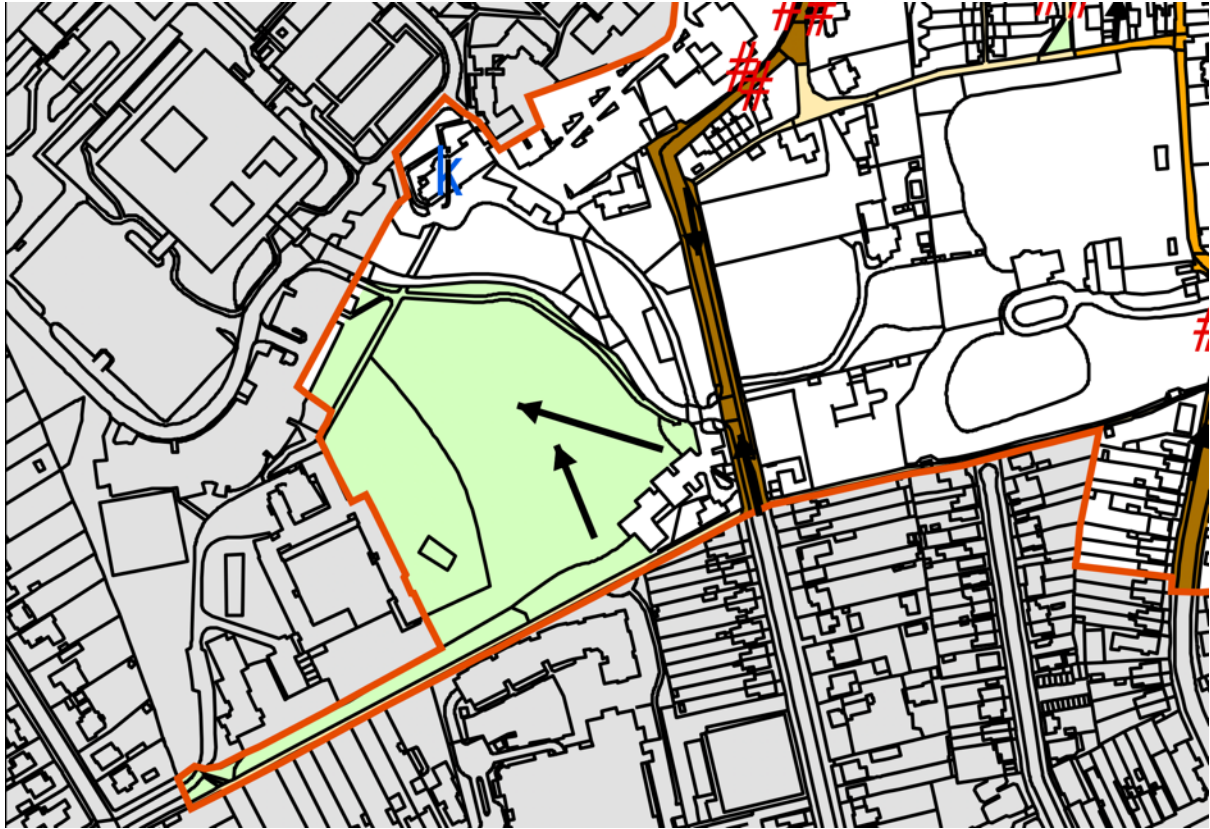
*Thames Water and the Environment Agency, to establish the appropriate drainage **mitigation** measures for any development.*

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

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 SPE20: Modification Requested

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

And:

- Removal of nonsensical justification of retaining car parking based on need to reduce queueing, the Council should not be parroting nonsense
- Reduce parking in exchange for further development as discussed (Response R6 – Air Quality)
- *“issues including parking are considered in a comprehensive way to make the most efficient use of land.”* Amend to: *“in a comprehensive way to make the most efficient use of land, address the climate crisis and realise essential health, social and environmental benefits.”*
- Protection and mapping of JR Green as Core Green Space
- Protection of Cuckoo Lane, Listed Walls, Treelines, significant view lines
- Removal of confusion around reduction and mitigation of flood risk in favour of reduction or “net-zero”
- Enforce use of SUDS and other systems with policy specifying that civil action will be taken if runoff continues
- *“Ostler Road and Ostler Way”* is Osler Road, *“Sandford Way”* is Sandford Road.
- Clear parameters for the protection of Cuckoo Lane, Listed walls and original John Radcliffe building and heritage barn near Osler Road/St Andrews junction
- *“There is a helipad on the parkland grounds behind Headington Manor House”* – No - This was temporary and removed.

- Update wording that JR is partly IN the OHCA.

WEST CENTRAL INFRASTRUCTURE AREA

No Response.

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 2040 Reg 18 Part 2 Consultation*” here:

<https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-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

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)

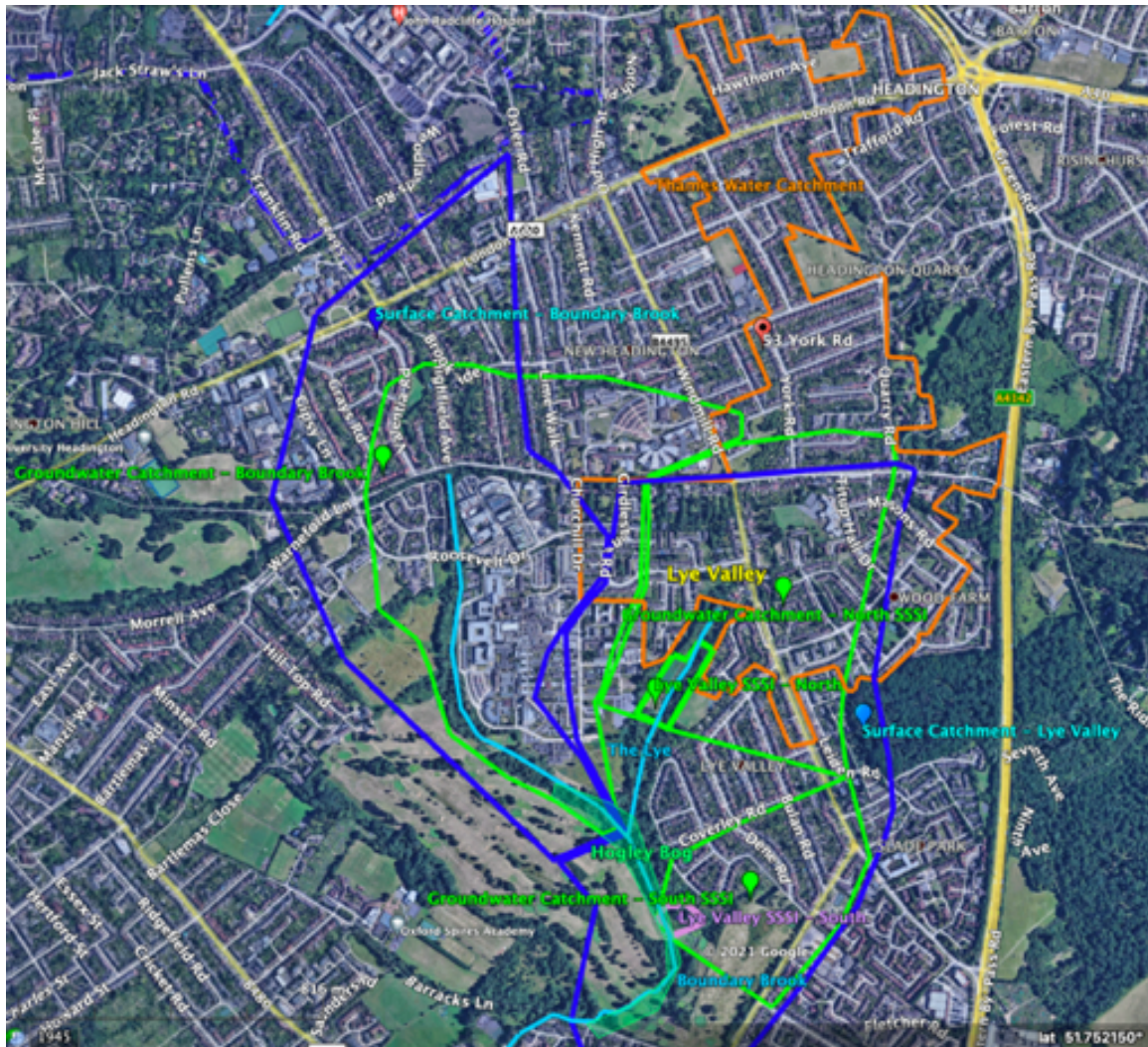
Key Points

- 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 pierce 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**):

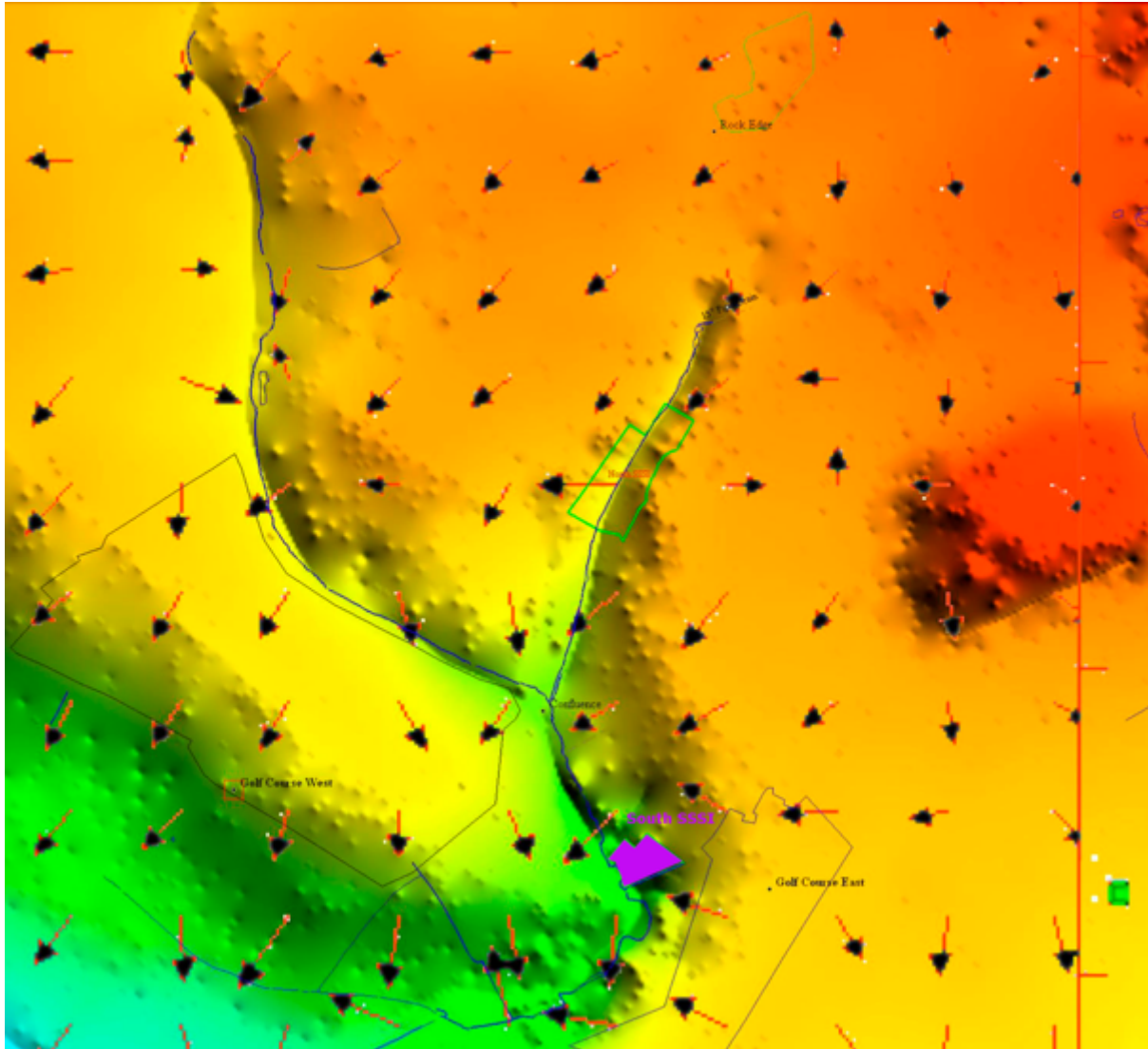


Fig: Lye Valley Illustrative Groundwater Flows (Lamberth, Fig 4)

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 roofs, 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.

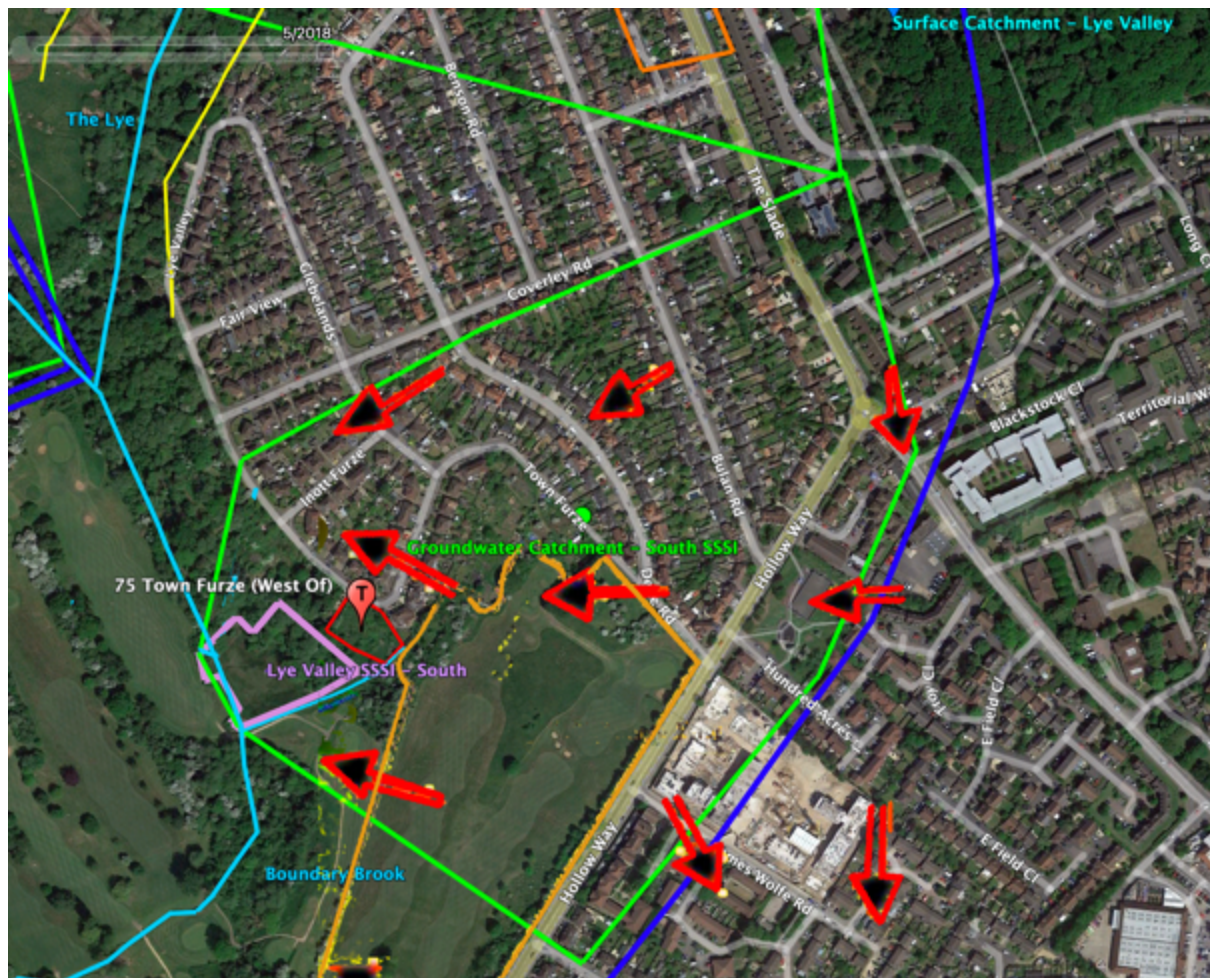
The downstream flood risk is further detailed in Appendix A.

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 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**)

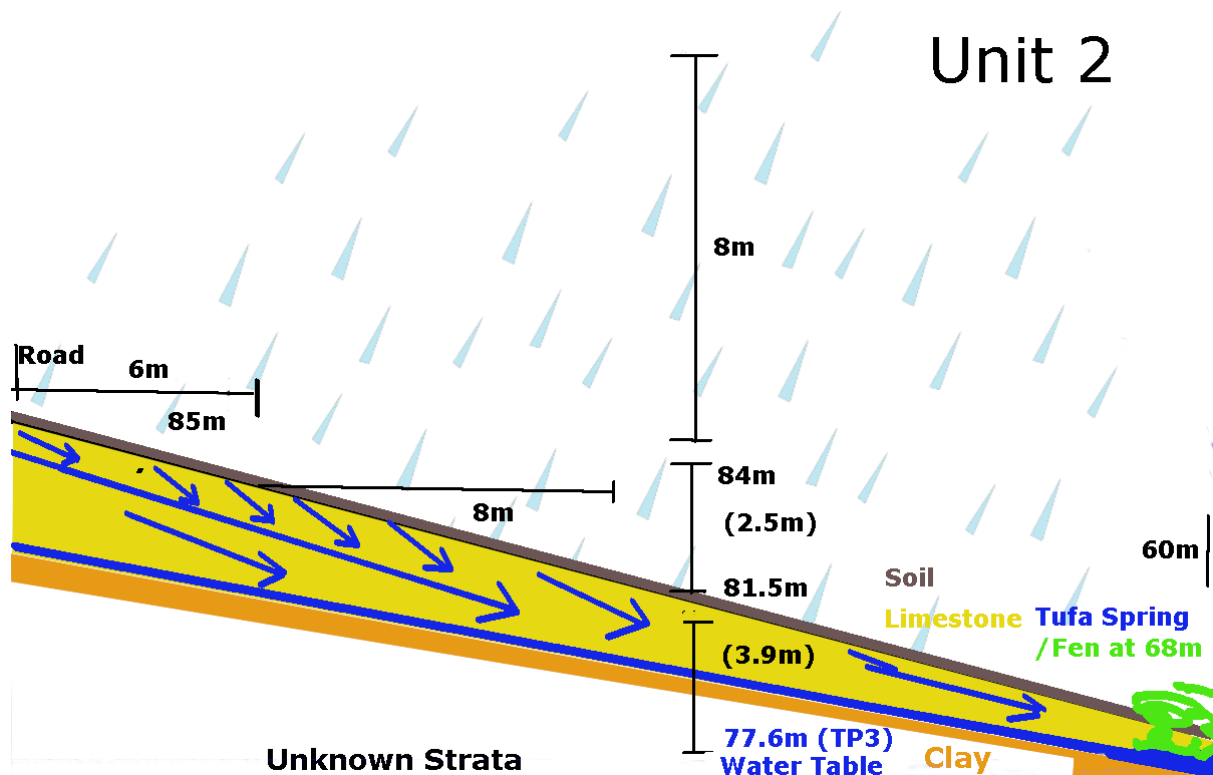
Development here will affect ALL flows from the entire catchment as it is a focal point just above the South Fen.

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

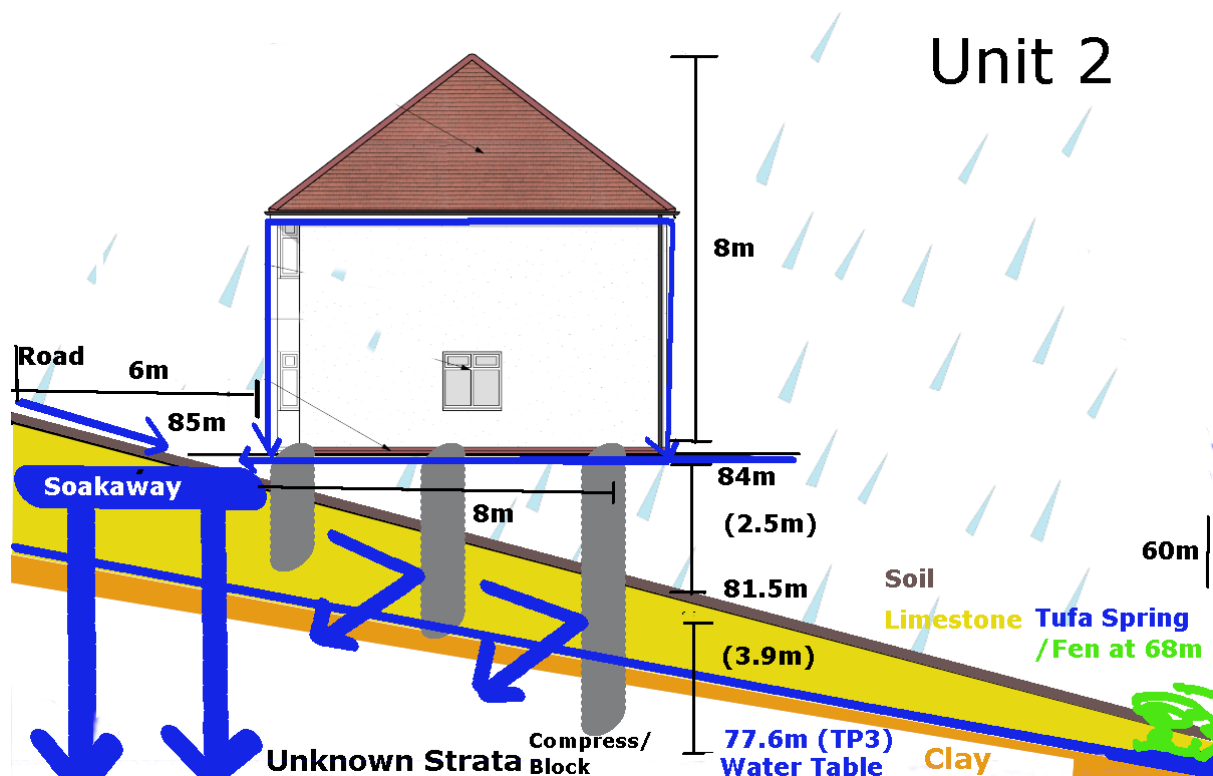
The Lye Valley is supplied predominantly from water passing through calcareous, base rich Corallian beds. Spring and seepage lines originate from where rocks meet the Oxford Clay. The groundwater has a uniform pH of 7.6 over the fen area. (BBOWT 1986 P1 70)

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%.

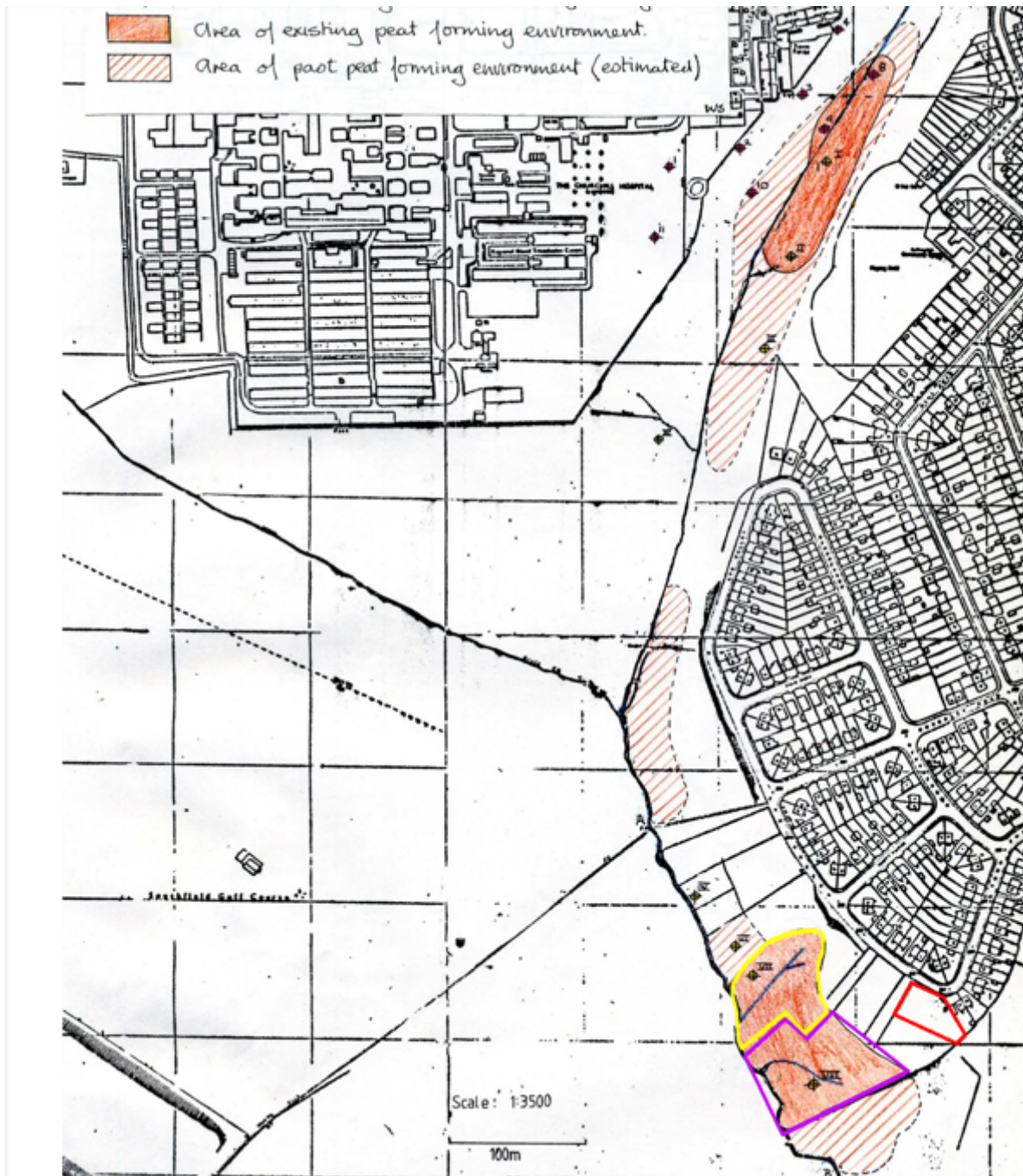
In order to ensure a high level of species diversity within the valley all the existing habitat types must be conserved. Of particular importance is the very species rich calcareous fen. This area must be maintained at least at its present size and preferably expanded.

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 (Annotated)– 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
Cotteslowe	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