

Report of Public Consultation on the Conservation Area Appraisal for Headington Hill Conservation Area

Summary

- 1.0 Following public consultation between 26th June and 24th July the draft conservation area appraisal has been amended to take account of representations received.

Preparation of the Appraisal

- 2.0 Assessment of the Conservation Area was undertaken with the assistance of Pullens Lane Association, Harberton Mead Residents Association, Jack Straws Lane Association, Headington Hill Residents Association, New Marston (South) Residents Association, the Marston Wildlife Group and Oxfordshire County Council Highways Department. In September and October 2011 local residents used the Oxford Character Assessment Toolkit to assess the contribution of their streets to the significance of the conservation area. These were used by the Conservation Officer to prepare Street Character Statements, which form a part of the appraisal. This provides an additional level of data gathering beyond the capacity available with the Council's resources and is best practice recognised in English Heritage's Guidance on the Designation, Appraisal and Management of Conservation Areas (published in 2011). The authors were also supported by a number of independent members of the public and the ward councillors.
- 3.0 Relevant extracts of the consultation draft were circulated to the City Council's Planning Policy, Development Control, Parks and Leisure and Estates Departments.

Public Consultation on the Draft Appraisal

- 4.0 The public consultation was advertised via the City Council's website, and on community websites. Stakeholder Groups, including the residents' associations and businesses located in the Conservation Area, including Oxford Brookes University, Rye St Antony School, Scholarship & Christianity in Oxford, EF Education First and Headington School were notified of the consultation by email. We were grateful to the Oxford Mail for publishing an article about the consultation on the appraisal, which gave it additional prominence. The draft appraisal, including the associated maps, was available to view via the internet. Comment on the draft appraisal was invited as written representations or via an open question using the Council's online consultation software. This process complies with best practice in the preparation of a conservation area appraisal as set out in English Heritage's guidance document.

Consultation responses received.

- 5.0 37 responses to the consultation draft were received, including representations from or on behalf of three institutions, five community organisations and 29 residents who live within the area and one local councillor. The majority expressed general support for the appraisal

(74%), whilst representatives of the area's community associations all expressed satisfaction that the appraisal provided an accurate representation of the area's character. However, 4 responses were received that were critical of the appraisal in general and considered that it had significant faults, or suggested that the process of preparation did not conform with best practice.

- 6.0 Where appropriate the appraisal has been amended to address these document wide comments.
- 7.0 A table setting out the more specific comments received, with responses to individual comments, is appended to this report and has been circulated to committee members with the appraisal. It will be made available to view on the City Council's web site along with the final draft of the appraisal. Copies will be made available at the meeting.
- 8.0 The online consultation included an open question inviting comment on the draft appraisal. Representations included suggestions of features of character that should either be retained or given greater emphasis due to their contribution to the character and appearance of the area and both current issues and particular vulnerabilities to change. These included the following:
 - 13 responses expressed concern over the potential impact of future development resulting in **intensification of institutional uses** in the area, which could have a negative impact on the area's character.
 - 8 responses noted the importance of the area as **wildlife habitat** and requested this be given greater emphasis.
 - 5 responses expressed concern over the **potential impact of future development** on the area's character, including sub-division of properties, development of green space, including gardens, and loss of historic Victorian houses.
 - 4 responses identified the **high volume of pedestrians on Pullens Lane** as having an impact on its character and amenity.
 - 4 responses identified the **seriously poor condition of Pullens Lane South** as a concern that should be given greater emphasis in the appraisal and that the causes of this condition in the appraisal required further examination.
 - 4 responses identified the **volume of motor traffic on private roads** in the north of the conservation area as having a negative impact on its character.
 - 3 responses identified the **mixture of uses of land north of Cuckoo Lane as an important positive feature** of the conservation area.
 - The **'private lane' character of Pullens Lane** was identified as making a positive contribution to the character of the area in 1 response.
- 10.0 A number of responses requested amendments or clarification, these included:

- Clearer wording is needed describing the **impact of traffic impacts on private roads** (4 responses);
 - The area needs more **control of the erection of fences**, planting of trees and types of buildings constructed (1 response);
 - The area requires a **long term vision to guide works** including public and private tree planting (1 response);
 - **Further details** on three properties were forward, providing additional historic information;
 - The **restriction of access to Harberton Mead** for residents only should be noted (1 response);
 - A response from Jack Straw's Lane Residents' Association provided useful suggestions on the terminology used to describe different parts of Jack Straw's Lane;
 - The Headington Hill Residents' Association asked that the **Oxford Brookes' NTLB building be described as having an overpowering visual impact on the area** and included in the list of buildings identified as having an intrusive architectural character. They also requested that the value of the residential enclave to the significance of the southern part of the conservation area be given greater recognition;
 - Two responses by or on behalf of institutions stated that the **residential character of the area north of Cuckoo Lane has been overstated** and that the significance of institutions should be given equal recognition;
 - The area is not 'self-contained' (1 response);
- 11.0 Features identified by respondents as having a negative impact on the character of the area included:
- **Noise pollution** from institutional sites (2 response);
 - Overwhelming impact of foreign language **students on public transport** (2 responses);
 - **Loss of views** to the city centre because of tree growth (2 responses);
 - **Loss of mature trees** as a result of disease and the need for appropriate replanting (2 responses);
 - The **impact of past housing development** on the character of the area (2 responses);
 - **Security lighting** (1 response);
 - **Littering** by foreign language students (1 response);
 - Increasing number of **large vehicles using the private lanes**, including coaches and home delivery vans (2 responses)
 - Impact of **construction traffic on the condition of Cuckoo Lane** (1 response);
 - Impact of **traffic speed on surrounding roads** (1 response);
 - Increase in '**domestic traffic**' as a result of 1970s and later housing development (1 response);
- 12.0 Where appropriate the text has been revised to take these views into account. A number of minor comments on text and mapping, including the accuracy of factual statements relating to individual buildings were received and have been addressed in the revised draft appraisal.

13.0 Following the completion of the amendments in response to comments received, the appraisal now represents a widely supported assessment of the conservation area's special historic or architectural interest, which identifies the character and appearance that is desirable to preserve or enhance.

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Background papers:

English Heritage, *Understanding Place: Guidance on Conservation Area Appraisals and Management*, 2011

English Heritage, *Conservation Principles*, 2008

Department for Communities and Local Government *PPS5: Planning and the Historic Environment*, 2010

Headington Hill Conservation Area Appraisal
 Report to East Area Planning Committee, 7th July 2011; Appendix
 Table of Comments made by Detailed Respondents to Public Consultation

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	Representation	Comment	Action
1	Detailed Response 1		
1.1	It is of some concern that in the Character Appraisal of Pullen's Lane no mention is made of High Wall as a Grade II heritage garden nor is it identified as such on the annexed Map 3	The designation of the gardens reflects its historic and horticultural interest but does not in itself contribute to the area's significance. Nevertheless it is helpful to record the location of all other designated heritage assets within the conservation area, whilst the recognition of one of the large gardens as of national significance helps to reflect the status of the large Victorian and Edwardian houses and gardens on Pullen's Lane.	Add Registered Garden to Map 1. and identify as designated heritage asset in text.
1.2	Another omission amongst others appears to be the failure to identify Pullen's Lane South as a 'Public Green Open Space', which it has always been as evidenced by the 1804 Enclosure Award which records it as 'Free Board' and the 1888 OS map and The Book of Reference which records it as 'Woodland'.	The small surviving island of verge with the line of trees that lies at the entrance to Pullen's Lane and runs along the boundary with Headington Hill Hall is noted in the text and would be helpful to note on the associated map. Discussion with the respondent has led to further interpretation of this part of Pullen's Lane which assists its interpretation and understanding of its significance	Identify surviving green open space at Pullen's Lane South on Maps 2 and 3. Include reference to Free Board status of Pullen's Lane South in text and relate to historic development of the lane.
1.3	The most glaring and potentially dangerous and misleading error, however, is made on page 39	It is accepted that the weight of vehicle traffic on the lane is deleterious to its character and the condition of the environment at certain times of	Amend 3.7 to give greater emphasis to

	<p>of the HHCAA, where it is claimed that:</p> <p>“The dominance of pedestrians in use of the lane emphasises the tranquil woodland character by limiting the impact of motor traffic. The absence of traffic makes the lane feel more open due to the access for pedestrians...”</p> <p>This may have been so 25 years ago; but, at certain times of the day, vehicular traffic in Pullen’s Lane can rival the worst congestion of any of Oxford’s major trunk roads.</p>	<p>day, specifically during the morning and evening rush hours and at times when construction traffic is particularly busy. Nevertheless there remain times of the day, when the lane is a tranquil woodland lane with little motor traffic when pedestrians and cyclists are able to access the space. This latter character reflects the historic interest of the lane as a former country field lane and the focus of an historic residential area and is considered to be a part of the character of the area that it is desirable to preserve and enhance. It is right that the character appraisal should highlight this positive character in order to ensure that it is taken into account in decision-making.</p> <p>The negative impact of increased traffic is highlighted at 3.7 in the appraisal. This could be given greater emphasis through use of a separate subheading.</p>	<p>impacts of rush hour and construction traffic on the tranquillity of the lane and its use by pedestrians and cyclists.</p>
1.4	<p>It is the stated intention to place the HHCCA before Committee for approval, in order to make it available for the determination of the Cotuit Hall planning application. Given that the HHCAA is seriously flawed in several areas, as highlighted in Appendices: 2-5, I put to Oxford City Council that this document should remain in its draft form until significantly more research has been done, physical, statistical and photographic evidence gathered and not only the historic and formal but also the functional errors and omissions made in the HHCAA have been duly addressed.</p>	<p>We do not feel the respondent has demonstrated that the appraisal is seriously flawed. We will add photographic detail to the draft in due course but believe that the text and mapping will stand alone as a means of setting out the special historic and architectural interest of the area and the character and appearance that is desirable to preserve and enhance and will form a useful tool to aid decision making.</p>	<p>Remove reference to photograph</p>
1.5	<p>Appendix 2 : - An Abridged history of Pullen’s Lane</p>	<p>Useful detail is added to our understanding of the development of these historic routes. Some of this detail relates to the legal rights of passage and ownership of the lane. The Appraisal is not a legal document that</p>	<p>Review historical development section to identify</p>

	The respondent provides detail on the development of Pullen's Lane South and North and Cuckoo Lane East and West	sets out the ownership of land or attributes responsibility for management. Nevertheless	gaps and opportunities to add detail or enhance interpretation.
1.6	<p>Appendix 3 : - The shocking state of Pullen's Lane South</p> <p>The respondent highlights that Pullens Lane south has not been record on the definitive map of public rights of way, despite a 1945 Council resolution to adopt the footway along the western bou8ndary of the lane and its inclusion on the map of highways maintained at public expense since 2005. The respondent identifies the very poor condition of the road and footpath in Pullen's Lane South as a result of lack of maintenance, as well as highlighting the impact of vehicle traffic on the character of the lane in general.</p>	<p>The poor condition of the road surface is identified at 2.7.</p> <p>The poor condition of the footpath was not noted in September 2011 (at the end of an unusually dry summer, but is perfectly evident in July 2012.</p> <p>The poor condition of the road has been reported as a result of long term absence of maintenance rather than entirely a product of heavy traffic.</p> <p>Indeed the erosion of the roadside verge is also evident, whilst the exposed bases of former tree guards would be considered to represent a possible hazard for pedestrians and cyclists.</p>	<p>Amend 2.7 to reflect the condition of the footpath in addition to the road.</p> <p>Amend 2.7 to highlight the longterm absence of maintenance at Pullens Lane South.</p>
1.7	<p>Appendix 4 : - Patterns of traffic in Pullen's Lane</p> <p>As a general overview it is felt that the document could be significantly improved as a historic record if descriptions were supported by photographic and statistical evidence as well as a detailed appraisal of the condition of the Private Road Network (PRN) and analysis of the impact of past decisions. Much of this additional information could be accommodated within the</p>	<p>We will seek to augment the draft document with photographs prior to its presentation to the East Area Planning Committee.</p> <p>There is considerable history of the ongoing concern over the poor condition of Pullens Lane South in particular that suggests this should be more fully described in the appraisal.</p> <p>The council do not have resources available to undertake additional analysis of road use in Pullens Lane and the other private roads in this area. However, the detail, including photographic evidence, provided by this and other respondents and our own observations confirm that the</p>	<p>Include photographs at key points in the appraisal to illustrate points made.</p> <p>Add detail to the discussion of the condition of</p>

	<p>body of the existing document were its repetitive nature curtailed and its overall structure improved.</p> <p>The impact of recent introduction of a Controlled Parking Zone at Fanklin Road is highlighted, which has resulted in increased use of Pullens Lane by parents delivering and collecting children from school.</p> <p>The impact has been on the character of the road, its amenity and the condition of roadside verges and trees.</p>	<p>impact of high volumes of conflicting use on the character of Pullens Lane at certain times of the day do have a significant detrimental impact on its character that should be reflected by a fuller statement in the document.</p>	<p>Pullens Lane South at 3.7 and 3.8.2.</p> <p>Add detail on the impact of traffic on the character of Pullens Lane at 3.7 and 3.8.2.</p>
1.8	<p>Appendix 5 : - The Character of Pullen’s Lane and its environs</p> <p>The respondent considers that the appraisal fails to identify the deep-seated problems of the conservation area and so falls short of providing an appraisal of its character that will ensure the sustainable future. The respondent identifies the negative features of the condition of Pullens Lane south again and states that it doesn’t identify the Highway Authority who should maintain it. Its also states the City Council have a duty to protect the grassed area and trees.</p>	<p>This has been dealt with in the comments above. The appraisal identifies issues affecting the area separately from the identification of elements of the historic environment that contribute positively to its significance.</p>	<p>Actions identified above</p>
1.9	<p>The respondent states that the front cover images on the draft appraisal do not accurately represent the character of the area and the pressure of traffic on Pullens Lane, which if taken at another time of day would show</p>	<p>We will add photographs to illustrate key points within the document. With the respondents’ permission we will use a selection of the images provided to illustrate the pressure of heavy traffic on Pullens Lane at present.</p>	<p>Add photographs to illustrate impact of heavy traffic at Pullens Lane</p>

	<p>“conditions that rival the worst rush hour traffic on any of Oxford’s major trunk roads”. This is backed up with examples of photographs showing these conditions.</p>		
1.10	<p>The respondent considers that the term ‘Private green open space’ used to describe the green setting of the houses and former houses on Pullens lane does not adequately describe formal and functional relationship of these spaces with the houses.</p> <p>The omission of the central lawn at Cotuit Hall is identified as a result of this definition, due to the surrounding of this area with buildings on three sides.</p>	<p>The term used was chosen to include surviving gardens and private parkland which has often been converted to non-residential use. However, it is recognised that it doesn’t clearly articulate the historic interest of the land in question and its contribution to the significance of the area.</p> <p>The lawn surrounded on three sides by 1960s institutional buildings has lost its relationship with the historic house and much of its historic character as part of the gardens of Cotuit Hall. The lawn to the east retains this relationship, whilst the space to the east is fringed by the surviving boundary planting of the grounds and retains surviving trees of the orchard shown on historic maps and recorded in 1916.</p>	<p>Consider using alternative language to describe surviving private gardens and parkland of historic interest.</p>
1.11	<p>The respondent suggest that analysis of land use should be given greater prominence in the appraisal, as it provides an indication of the pressures affecting the ‘Private Road Network’.</p> <p>Key facts noted are:</p> <p>five large educational uses are located in the area.</p> <p>all except one of these have direct access to the public highways infrastructure.</p> <p>Three are schools set within substantial ‘private Green Open Space’.</p>	<p>The development of land use within the area has had an impact on the survival of buildings and other features contribute to the significance of the conservation area. In some circumstances historic features have been lost, creating vulnerability for the area’s significance.</p> <p>The density of use of schools within the area does contribute to the character of the area as a result of the intensity of use, e.g. generation of pedestrian and motor traffic, noise, light pollution, cooking odour and built development.</p>	<p>Add mapping and analysis in Section 1.2 Context to describe the uses within the conservation area.</p> <p>Note the low density of use of specific institutions within the area.</p>

	Rye St Antony School has a density of use of 30 pupils per acre. Headington School has a density of use of 33 pupils per acre.		
1.12	The respondent asks for clarification of the reason for subdivision of the conservation area into northern and southern sections, and suggest that division based on four areas defined by use classes might be more appropriate: Residential/Hostel Use, Non-residential Education, Residential education and Public Green Open Space, with supplemental information on plot use ratios. This would help to illustrate the general character and grain of development that new proposals could be assessed against and avoiding overdevelopment with inadequate access to public infrastructure.	The division of the area into areas north and south of Cuckoo Lane follows a tangible division in the character of the area between the larger properties in the north, including institutional uses, and the Victorian and Edwardian suburban residential development of large houses in large plots on privately maintained roads to the north, now hosting a mixture of residential and educational use. The division of the area highlights the differing contributions of the institutional and residential character to the significance of the area. It is important to make a distinction between landuse and character in the context of the appraisal.	Provide additional statement explaining the importance of character in the conservation area and its distinction from land use.
2.	Representation by West Waddy ADP on behalf of EF Academy (EFA) and EF International Language School (EFILS)		
2.0	Overview		
2.1	They OBJECT	They are welcome to object to the document and we will report this to the planning committee. We will respond to each of their individual reasons for objection separately.	Report objection to committee
2.2	The first relates to procedure. You appear to have failed to properly engage with all property owners within the conservation area during the formulation stages of the document. All	The engagement with the full community has been through the public consultation on the draft documents, which lasted from 24 th June to 26 th July (four weeks), to which all interested parties were invited to contribute. Indeed, we have granted three of the institutional landowners	No further action

	<p>interested parties must be invited to contribute not just private householders. We are of the opinion that the exclusivity of private householders contribution has influenced the description of parts of the Conservation Area and this does not properly reflect the reality on the ground.</p>	<p>an extension to the consultation period in order to enable them to respond. Consultation at the point of having prepared a draft appraisal document is recommended in English Heritage's Best Practice Guidance on the Designation, Appraisal and Management of Conservation Areas (published in March 2011).</p> <p>This guidance also highlights the potential value of asking local residents to undertake a part of the initial survey work as a means of helping to deliver the appraisal and quotes the use of the Oxford Character Assessment Toolkit as a means to enable this.</p> <p>In September 2011 we approached local residents associations and community groups to participate in early information gathering for the appraisal. The associations appointed representatives to undertake an assessment of their area using the character assessment toolkit. EFA and EFILS are members of the Pullen's Lane Association and, therefore were represented by this organisation in this data gathering. The information gathered was critically assessed by the City Council's Conservation Officer prior to its use in the preparation of the draft appraisal by the City Council.</p> <p>Nevertheless, the City Council received and reviewed correspondence from West Waddy ADP acting on behalf of EFA and EFILS on 8th May 2012, 21st May 2012, 26th June 2012, which were taken into account in drafting the appraisal. This is additional to the formal consultation that has otherwise been undertaken.</p>	
2.3	<p>Approaching institutions after the event to endorse the document is not sufficient to overcome this objection. They should be involved constructively from the outset.</p>	<p>As stated in our observations to 2.2 above, English Heritage's guidance as set out in their 2011 Guidance document is to undertake consultation when a draft document has been prepared but before the process is too far advanced to exclude further influence. The consultation undertaken between 26th June and 24th July 2012 fulfils this function. We have</p>	No further action

		received representations from many parties and will consider all of them to determine whether any amendment to the conservation area appraisal is justified.	
2.4	<p>Our second reason to object concerns some of the detail. This in most cases is as a result of the first reason - that is too great an influence from private householders.</p> <p>I trust you will take these comments seriously. We offer them as a constructive addition and where possible have suggested simple alterations to text to amend descriptions, which we believe are erroneous.</p>	We will review individual comments on detail on their merits and relevance to the purpose of the conservation area appraisal as a public document describing the special historic or architectural interest of the conservation area and the character and appearance of the area that is desirable to preserve and enhance, taking into account the guidance of English Heritage and the requirements of the government's National Planning Policy Framework and Local Plan Policies.	Consider individual comments below and take action to amend the report where justified
2.5	<p>However, the procedural issue is something more significant and you may wish to discuss this with colleagues and decide whether a further workshop involving the non-residential stakeholders be organised. I think that's the only way in which you will overcome ongoing criticism of the process.</p>	<p>As stated above the public consultation on the draft conservation area appraisal undertaken between 26th June and 24th July 2012 provided an opportunity for both residential and non-residential stakeholders to contribute to the evolution of the conservation area appraisal from the first draft. This follows the guidance set out in English Heritage's published guidance.</p>	No further action
	Comments on Procedure		
2.6	<p>Page 5. It is clear that no institutional interests have been directly approached to contribute to the conservation area appraisal. Local involvement for the City Council has meant</p>	<p>As described in English Heritage's published guidance have highlighted the potential of well informed local residents to undertake a great deal of the initial survey work for conservation area appraisals.</p> <p>This information has supplemented the data provided by published</p>	No further action

	<p>residents only. Enquiries confirm that no other institutions operating within the Conservation Area were invited to take part in the public consultation that took place in 2011. In particular, and for Pullens Lane especially, only local householders were canvassed for feedback and none of the institutions along the lane were invited to partake. The statement is clearly flawed as a result</p>	<p>reports on parts of the conservation area, including a number of heritage assessments prepared by West Waddy.</p> <p>The data gathering undertaken in 2011 was organised through community organisations including the Pullens Lane Association, of which EFILS and EFA are fee paying members along with Rye St Anthony School and Scholarship and Christianity in Oxford (SCIO). The committee of the association were approached via the chairman and nominated a representative to liaise with the Council on this evidence gathering.</p> <p>All of the institutions on Pullens Lane have been contacted directly to request their input to the public consultation which is the appropriate point for this involvement as described in English Heritage's guidance document</p>	
2.7	<p>The draft statement states (page5) that the findings of a number of assessments of the character of the area prepared by local institutional landowners have also been taken into account. This confirms that the City Council recognised that its contacts with institutional uses in the CA were deficient as it was obliged to rely upon historic material submitted for other sites and for other purposes. Consulting these report prepared for other purposes cannot be regarded as a suitable alternative for proper consultation with EF Academy and EF International Language School as major landowners in the CA, because these reports are for other sites and purposes. In any event the findings of other reports have not been</p>	<p>These reports have been prepared on behalf of a number of institutions for sites that lie within the conservation area to inform the preparation of masterplans and planning proposals that will affect the area. To perform their function they should identify the institution's view of the significance of the conservation area as a heritage asset, identify the features that contribute to that significance and the particular contribution of the property affected by the proposals to the significance of the area. As such they should be important sources of information for the preparation of the appraisal. If they do not provide information that is of value to the preparation of such a document it is doubtful whether they are fit for their original purpose. Consideration of their content should not be taken as a substitute for the public consultation, which has been undertaken between 26th June and 24th July 2012.</p> <p>The Council may choose to differ in the assessment of the significance of a heritage asset from that made by a private company on behalf of a</p>	No further action

	properly reflected within the draft character assessment.	landowner or planning applicant.	
2.8	The appraisal fails to reflect the character or appearance of the CA as it is today. In canvassing options only from local householders it contains too many vague judgements on institutional sites and operations clearly regarded as worthy of designation in 1977.	<p>The purpose of the appraisal is to identify the character and appearance of the conservation area that is desirable to <i>preserve and enhance</i> [emphasis added]. This is not the same as a straightforward description of the present character of the area but should include value judgements that identify the features of the area's character and appearance that reflect its historic or architectural interest that merits its designation. Clearly not all features of character and appearance will make a positive contribution to this character and appearance. Indeed, the National Planning Policy Framework states "...Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance " at para. 138 and "Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. " In identifying where past development of the area has detracted from the area's significance the appraisal identifies opportunities for future development to enhance and better reveal this significance, in addition to highlighting threats and vulnerabilities to it.</p> <p>The public consultation undertaken between 26th of June and 24th July 2012 provided an opportunity for both local householders and institutions to comment on the content and findings of the appraisal.</p>	No further action
2.9	EF International Language School and EF Academy are both institutions located within the conservation area. In the case of the former Plater College this site was already in institutional use when the conservation area was designated as such in 1977. In the case of	This is perfectly true but does not necessarily demonstrate that the institutional use of either site has contributed to the historic or architectural interest of the area or that make a positive contribution to its character and appearance. Indeed the development of both sites may have been viewed as a threat to the character and appearance of the area to which designation of the conservation was a response. See the	Provide further detail regarding the 1973 Headington Hill Policy Statement and the 1977 Statement of

	Cotuit Hall this property has been in institutional use for much of its history since 1917 and includes significant modern development, which predates the Conservation Area designation of 1977.	Statement of Principles relating to the Conservation Area adopted by the Council in 1977 and the Headington Hill Policy Statement adopted which preceded it from 1973, which demonstrates that the Council were concerned to maintain the residential uses of properties on Pullens Lane and restrict the intensification of institutional uses within the area north of Cuckoo Lane. The development of Plater College, resulting in the loss of one of the large Victorian Houses that contribute to the architectural and historic interest of the area would be viewed as a loss of the area's significance, whilst development of increasingly high density buildings detracts from the character of large houses in spacious grounds.	Principles adopted by the Council to document the principles under which the Council designated the Conservation Area 1.1.
2.10	At Cotuit Hall the original house has been preserved thanks in all likelihood to the change to institutional use, which took place in 1917.	The preservation of Cotuit Hall, may on this basis be equally attributed to its reversion to private residential use in 1930 for Redvers Opie (a Fellow of Magdalen College) and in the 1950s for the Revd. D. B. Jones. In the intervening time it was a children's home (a residential but not educational institution), which occupied the main house. The development of student accommodation blocks for Oxford Technical school in the 1960s within the grounds of the house has been identified by West Waddy ADP as having a negative impact on the contribution of the grounds to the significance of the conservation area. The changes in use of Cotuit Hall has been noted in the appraisal.	No further action
2.11	For the above reasons we consider the draft CA is unsound and requires to pass a more rigorous consultation to reflect full community engagement rather than only the local householders.	The consultation on the document between June 26 th and July 24 th 2012 has provided an opportunity for both householders and institutional landowners to engage with the evolution of this document by commenting on the draft. This conforms with the guidance provided by English Heritage on preparing conservation area appraisals.	No further action
	Comments on the appraisal text		
2.12	Character Features and Issues (Pg. 1 and 2) The survival of Civil War siege works is	Historic maps record this as the location of siege works. This provides potential for remains to survive. Remains, albeit truncated, of a Civil War	No further action

	technically 'potential' but in practice unlikely, e.g. lack of evidence of Fairfax's citadel HQ in the relatively undisturbed area at the top end of South Park.	siege camp would rate as of national importance. As such it is appropriate to highlight the potential for their survival until such time as this can be tested through fieldwork.	
2.13	<p>There is recognition that public and private institutions dominate the south of the conservation area and there is recognition of the city's developing reputation for excellence in education. This is tempered by the assertion that the north of the CA is dominated by private housing (and furthermore that the north is taken as everything north of Cuckoo Lane). WWADP's heritage work for EF International and others have identified the area along Pullens Lane, including Cotuit and Rye St. Anthony as a zone of transition between these constituent uses and this approach is commended as representing more accurately the situation on the ground. Mapping has already been forwarded to the City Council that demonstrates that almost all the eastern side of Pullen's Lane and around half the western frontage is fronted by institutional uses.</p>	<p>There appears to be a fundamental misunderstanding in this objection between 'land use' and 'character and appearance' as it is used within the assessment of the significance of a conservation area and its management. The special historic interest of the conservation area north of Cuckoo Lane has been defined as the development of a Victorian suburb at Pullens Lane over the earlier rural landscape on the edge of the city and its early 20th century continuation to the north, which illustrates the development of the housing need for Oxford University's elite as the university expanded in this period. The special architectural interest of the area is the survival and proximity of a cadre of sympathetically designed large houses representing examples of the work of a number of locally and nationally significant architects built between 1880 and 1910, with later additions as groups to the north in Harberton Mead and Jack Straw's Lane, with at least partial survival of the gardens and subsidiary buildings of these houses providing a contemporary and sympathetic setting. There is clearly a mutually supporting relationship between the special historic and architectural interests of the area. The character and appearance of the area that reflects this architectural and historic interest and, therefore, is desirable to preserve and enhance is typified by the historic residential character of the houses and their landscapes and the character of the lane as a quiet lane running between the well-timbered grounds of these establishments.</p> <p>There may be some potential to recognise the long presence of Rye St Antony School as contributing to the significance of the area. However, the school have not introduced a significant architectural element that</p>	<p>Add clarity on the role of the appraisal in identifying the special historic or architectural interest of the area the character and appearance of which it is desirable to preserve or enhance.</p> <p>Add detail in Part 3 to explain how the assessment of the area's special historic and architectural interest has been defined and how the features noted represent the character and appearance that is desirable to</p>

would reflect this interest materially (for an example where school use has introduced a building that contributes to the significance of the historic academic use see Headington School). Rather, they have preserved the Victorian buildings they inherited and their garden setting, whilst the placement of new school buildings in their grounds, away from Pullens Lane, has helped conserve the historic residential character of the lane, in spite of the academic use. The provision of access to Rye St Antony School from Franklin Road rather than Pullens Lane supported this character by averting an impact of traffic to and from the site. Unfortunately, it appears this has recently failed to assist in conservation of the area's character since the introduction of new parking controls at Franklin Road.

As noted above the additional buildings for residential accommodation for students and a games/lecture room built at Cotuit Hall are noted in West Waddy ADP's heritage assessment for Cotuit Hall as having a negative impact on the significance of the conservation area. The concern to restrict the further intensification of Whilst the conservation of the original house and parts of its green setting contribute positively. The residential institutional use of The Vines by SCIO is not considered to provide any particular historic interest to the conservation area, whilst the maintenance of the house has preserved its architectural interest as a house and a large part of its garden setting in the immediate vicinity of the house.

The demolition of The Pullens for Plater College denuded the architectural interest of the conservation area. Indeed the demolition of the building after the Council's adoption of the Headington Hill Policy Statement might be seen as justification for its designation of the Headington Hill Conservation Area shortly after.

preserve or enhance.

Provide reference to the 1973 Headington Hill Policy Statement and 1977 Conservation Area Statement of Principles

2.14	<p>Previous Conservation character appraisals and reports prepared by WWADP for the Headington Hill Conservation Area reports checked. The relevant text of the report for EF Academy is reproduced below with part highlighted. It is clear that WWADP identify the area around Cotuit as a mixed/transitional area.</p> <p><i>'The aerial photograph used as a basis for drawing EFY/L02 shows that the division between the northern residential half of the Area and the southern, institutional and park half is relatively well defined, the only sections where the division is blurred being in the vicinity of Cotuit Hall and Rye St Anthony School where the institutions have been created from larger residential properties originating in late Victorian times. These large houses still survive, and the institutional uses in mature settings provide the framework for the later, less distinguished infill developments, and give Pullens Lane much of its present character. Though a vehicular thoroughfare, and running in a straight line, it has a less formal appearance than for example, Cuckoo Lane to the east, largely because of the lack of formal front boundary treatments, the absence of pavements, and the predominance of mature planting.</i></p> <p>The WWADP report for Headington School</p>	<p>It is clear from these extracts of reports supplied by West Waddy ADP's reports for their clients that WWADP are able to identify a clear change in character between the southern and northern halves of Pullens Lane. Whilst they state that they feel the character has been blurred they identify the importance of the large Victorian houses in their large grounds as a key contributing factor to the character of the lane, along with the straight but informal appearance of the lane and its roadside verges and the more formal appearance of Cuckoo Lane. We would support their comment from 2006 that Cuckoo Lane forms a recognisable dividing line. This conforms with the assessment of the key positive features of the lane's character provided in the conservation area appraisal. It is a function of the appraisal to identify the features that make a positive contribution to the significance of a conservation area (see Para. 138 of the NPPF for need for this identification).</p> <p>The importance of the institutional uses to the significance of the conservation area is not clear from their assessments. It does influence the area's character but this may be for better or worse. The implication of the Headington Hill Policy Statement of 1973 and Statement of Principles of 1977 is that further intensification of institutional uses in the area north of Cuckoo Lane would be detrimental to its character and should, therefore be resisted. Our own assessment would be that some aspects of the previous institutional development in the area was detrimental to its character through the loss of green open space including the garden setting of large Victorian houses and introduction of buildings with an architectural character that fails to support the significance of the area. The loss of one of these large houses for the development of Plater College is particularly lamentable. Intensification of activity within the EF International Language School and Cotuit Hall sites has recently resulted in increases in the amount of traffic and congestion from large groups of pedestrians, as well as reports of anti-</p>	<p>Provide clarity in the introduction to the document that the appraisal identifies the features that contribute positively to the significance of the conservation area, by assessing their importance to the character and appearance of their area that reflects its special historic and architectural interest.</p>
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(2007) also states:

*'The University's Headington Hill Hall site occupies mature grounds on the other side of Pullens Lane to the west of the School grounds. On the north side, Cuckoo Lane forms a pedestrian route connecting Pullens Lane and Headley Way: **to the north of this are grounds of EF International (the former Plater College) and Rye St Anthony School, both created within the grounds of large Victorian houses.** There is further unexceptional residential development at the north east corner associated with Woodlands Road and Franklin Road.*

The WWADP report for Oxford Brookes University (2006) quotes the (then available) City's short description as being insufficient to define the character of the Area and goes on to state:

The aerial photograph used as a base for drawing OBM/L02 shows that the division between the northern residential half of the Area and the southern, institutional and park half is relatively well-defined, **the only sections where the division is blurred being the former Plater College and the Rye St Anthony School where institutions have been created from larger residential properties originating in Victorian times.** Cuckoo Lane forms a

social behaviour, which have further detracted from this character.

As such the 'blurring of character' described would be regarded as a negative impact on the special historic and architectural interest of the area and the character and appearance of the area, which is desirable to preserve or enhance. This is how it is reported in the appraisal document.

As a minor point, the Heritage Assessment prepared for Headington Hill Hall in 2006 relates to an area that extends to Cuckoo Lane in the north. To state that land separated from the site only by this lane does not form a part of this site's context or is too remote to require assessment is questionable and fails to consider the historic significance of the inclusion of this land within the Headington Hill estate and its survival as publicly accessible green open space. That the assessment does identify the character of the land at Plater College and Rye St Antony School as institutions that have been developed from larger residential properties originating in Victorian times suggests that the assessment has in part considered the character of land in the northern part of the conservation area.

	<p>recognisable dividing line, and as this is some distance to the north of Headington Road, it is considered that the northern half of the Area does not need to be considered in this report as forming no part of the context for the Gypsy Lane Site or for the Hall Site.</p> <p>The WWADP report for Oxford Brookes University does not attempt to offer any comments on the northern half of the Area as it was too remote to the sites under consideration.</p>		
2.15	<p>For the above reasons the character of Pullens Lane is neither predominantly residential nor predominantly institutional but is transitional between the predominantly residential use north of Harberton Mead and the predominantly institutional use south of Cuckoo Lane.</p>	<p>See comments above. The appraisal identifies the character and appearance that is desirable to preserve or enhance which reflects the special architectural or historic interest that merits the designation of the conservation area. This is supported by the 1973 Headington Hill Policy Statement and the 1977 Statement of Principles.</p>	No further action
2.16	<p>The City's world-wide reputation for excellence in education means that it must be accepted that Oxford caters for a wide market than "the citizen's need for further education establishments' as stated.</p>	<p>The statement is "Educational institutions in the south of the conservation area reflecting Oxford's developing reputation as a centre for excellence in education and the development of the city's citizens' need for further education establishments". This comment refers to a bullet point in the statement of significance. It refers to the special historic interest of the Oxford Brooke's University's Gypsy Lane Campus as the Oxford Technical College built in the 1960s to provide further education for the city's residents, whereas the older Oxford University was known to serve a less local and, indeed, international market of little educational advantage to the city's citizens. As such, the college buildings are a material representation of the ancient antagonism of</p>	No further action.

		<p>'town and gown' that has been an important element in the city's history. The development of Oxford Brooke's University's international reputation as a centre for educational excellence since its creation from the Polytechnic in 1992 is, as yet, not considered to represent a source of special historic or architectural interest that merits the designation of a conservation area. A similar assessment relates to the contemporary development of Cheney School and, arguably, to Headington School.</p>	
2.17	<p>Large houses set in mature landscaped grounds are said to be the 'established character' but those that survive do so largely because of change to institutional uses, (the only private residential house remaining on Pullens Lane is High Walls). However the loss of larger houses for suburban developments – with no architectural merit – does not appear to raise any issues for the Council: the continuance of residential uses is taken in the appraisal as preserving the character of the CA. In reality the suburban developments have involved the loss of the original houses and a large number of trees over the intervening years. Insufficient regard has been had to the role in suburban development in increasing intensity of activity in the northern part of the CA.</p>	<p>Large Victorian (and Edwardian) houses that remain in private residential use include Pullens Gate (built c. 1850 and subsequently improve in the late 19th century), High Wall (built 1910), Mendip House (built by 1900) and Pullens End (built 1883/4). Harberton Mead House was demolished for the development of Rolfe Place, although its lodge and elements of its garden tree planting survive and are noted among the area's positive character features. Winshields, just to the north of Pullens Lane, was constructed by 1910 and might also be included in this group.</p> <p>As such the only large house in this section of the Conservation Area that has been removed for suburban housing development is Harberton House after its loss in a fire in 1972, whilst The Pullens is the only house removed for institutional use. Infill development at Pullens field made use of a small field or paddock.</p> <p>It is true that infill development has increased the intensity of uses within the area and reduced the sense of space, including the green open space and tree cover that is identified among the positive features of the area's character. As such the remaining tree cover and green space should be all the more highly prized. Nearly all of this development occurred prior to the designation of the conservation area. The recognition of the need to prevent further loss of green space is reflected in the restrictive covenants attached to properties at Feilden Grove to restrict further infill development and in a recent planning inspector's</p>	<p>Amend appraisal to identify the loss of green open space and intensification of building through suburban residential development having detracted from the area's historic character and a vulnerability to its character in future.</p> <p>Include mapping to reflect mixed use of land within the northern part of the conservation area.</p>

		decision notice affecting No. 1 Harberton Mead (Barna Brow).	
2.18	p. 2-3. Tree management is stated to be required. Trees of forest scale are said to be needed for replacements but these are largely incompatible with suburbia as demonstrated by large number of applications for felling in recent years. (See planning history for Rolfe Place: 28 applications to fell trees and 10 to cut/prune since 1994 and all but 2 approved).	The figures quoted reflect the current vulnerability of the conservation area's tree stock and support the appraisal's identification of a need for joined-up tree management across the area. A similar review reveals that there have been applications to fell 11 trees, including several beech trees, plus one application to fell that is not available, and 7 applications for pruning within the Cotuit Hall site over a similar period. This does not suggest there is any considerable difference on the attrition on tree cover between the two uses. Meanwhile there has been considerable tree planting for private gardens within Harberton Mead (including Rolfe Place) and Feilden Grove that has made a considerable contribution to the area's sylvan qualities.	No further action
2.19	Context Pg.6 LH/RH. It may be taking things too far to see the impact of underlying geology/soils on tree communities given the area was originally fields (see p8: states farmland in early C19 and part of Headington's open fields which remained open until 1836 (p10 RH). It may be possible to state that all trees have been planted i.e. for aesthetic reasons. (See p11 LH: planting of pines by Baxter).	The land of Headington Hill Hall lay within St Clement's Parish and was part of the land enclosed by Sir Christopher Brome in 1565 as stated in the appraisal. The presence of a concentration of pines on the ridge of the hill is noted as a distinguishing feature of the area in the 2002 Character Assessment of Oxford in its Landscape Setting. The reasons for the planting of pines in this area may be various but are likely to relate to the arboriculture tastes and understanding of the Victorian planters of gardens in this area. Nevertheless the difference in planting in the grounds of Headington Hill Hall in particular is noted in the study of The Landscape of Headington Hill Hall by Land and Landscape Management, 2006. As a botanist and curator of the Oxford Botanical Gardens it would be expected that William Hart Baxter took into account the prevailing soil conditions when devising his planting scheme for Headington Hill Hall, including the appropriate siting of the pinetum. Pines prefer acidic, well drained sandy or gravelly soils. That the pines have thrived in this area for a period of more than 150 years suggests it provides suitable soil	No further action

		conditions.	
2.20	<p>Historical Development</p> <p>Pg. 12 LH/RH The appraisal is entirely uncritical of suburban housing failing to record the destruction of the Peto Garden at High Wall by the laying out of Fielden Grove. There is no analysis of the changes wrought by housing estates because, in league with residents interest, they are said, with little qualification, to 'preserve the quiet residential character of the are and with generous gardens that ensure a green and spacious character.'"</p>	<p>The changing development of the garden at High Wall is described in depth in the Street Character Statement for Feilden Grove. What this demonstrates is that a large part of the garden built over by the development in the 1970s was not part of Peto's scheme for High Wall but was added to the gardens later in the 20th century. The gardens remain in sufficiently interesting condition to have been designated a Grade II Registered Garden of Special Historic and Horticultural Interest.</p> <p>The residential development in the 1970s did reduce the openness of the landscape with buildings of no great architectural merit but also introduced an important element of trees planting and, by generally introducing open fronted gardens, and well spaced buildings, retains a sense of openness. The new buildings were generally of a smaller scale than the older, allowing these to maintain their prominence in the landscape and have a domestic character, including traditional form and detailing that supports the character of the area as a residential suburb. Moreover, their low density and low vehicle movements generated supports the tranquil environment that is a valued feature of the area's character. This is reflected in the 1973 Headington Hill Policy Statement and 1977 Statement of Principles.</p>	<p>Action note the loss of openness in the conservation as a result of infill residential development in the 1970s, including the loss of historic private gardens and Harberton House as having increased the vulnerability of the conservation area's significance.</p>
2.21	<p>p.12 RH [Amend] Cotuit Hall was considerably extended to provide 102 study bedrooms [insert dining and lecture facilities]. It remained in this use throughout the college's transformation to a Polytechnic and, later into Oxford Brookes University. It was sold to EF Language Schools [replace with Academy] in 2011.</p>	<p>The planning permission granted in 1966 was for residential accommodation, a games/lecture room and ancillary accommodation.</p>	<p>Amend text to "Cotuit Hall was considerably extended to provide 102 study and a games/lecture room. It remained in this use throughout the</p>

			college's transformation to a Polytechnic and, later into Oxford Brookes University. It was sold to EF Academy in 2011."
2.22	<p>Part 3. Headington Hill north of Cuckoo Lane</p> <p>Pg.29 RH According to the appraisal, the course of Harberton Mead 'appears' to have developed in stages 'allowing' the subdivision of the earlier grounds of Harberton House. This makes it sound very accidental. The road's doglegs are said to create enclosed areas which contribute to its 'low-density-feel'. There is no recognition of the starting point here of current higher density with originally only one house on the site in a designed landscape. Both original house and setting have been destroyed to make way for later, often quite suburban development.</p>	<p>The development of Rolfe Place is noted at page 51. Indeed, subdivision of the former grounds of Harberton House in 1970s increased the density of development in the conservation area prior to designation of the conservation area. This should be highlighted as having denuded the spacious quality of the conservation area and raising the value of surviving large housing in open garden settings.</p> <p>The development of the road through Harberton Mead, could be better described here. It is not clear that the area ever formed the property of a single house and gardens. Both St Catherine's and Winshield both appear to have been of equally early origin. The line of large houses at Nos. 1,3,5 and 7 Harberton Mead, which are of a high architectural quality, were built slightly later, in land which did not form part of the grounds of Harberton House, as were Gateways and Julianstow. The intensification of development for the cul-de sac at Rolfe Place followed the conflagration that destroyed Harberton House</p>	Amend Section 3.7 and 3.8 as noted above and below.
2.23	<p>Pg. 30 RH Smaller plots on Jack Straws Lane are stated to be more regular – resulting in a 'more intensive feel.' But infill developments at Pullen's Field and Feilden Grove [and we can add Harberton Mead from above] are stated to manage to conserve the sense of a 'larger enclosed space'. The loss of open space at</p>	<p>The more intensive feel of the division of properties on Jack Straw's lane is noted as a positive feature of its character, with part of its physical emanation being the avenue of mature horse chestnut trees planted at the front of the properties.</p> <p>The subdivision of land at Feilden Grove and Harberton Mead has resulted in a loss of some of the openness of the area and the special</p>	Add comments 3.7 Issues, vulnerabilities and opportunities for enhancement; 3.8.3 Harberton Mead to highlight the impact

	<p>Pullens' Field and the sub-division of former large gardens to create smaller plots should more accurately be described as 'more intensive' than the original open space//Victorian house and garden that they have replaced.</p>	<p>historic and architectural interest of the area through the loss of Harberton House and its gardens and part of the garden of High Wall. Here we have emphasised the positive contribution to the significance of the area of surviving elements of the garden landscapes, including subsidiary buildings (No.1 Rolfe Place and Jean Cottage/Tall Chimneys), tree planting and a sense of openness created by open plan front gardens and the placement of houses, as well as the sense of tranquillity provided by domestic use and low of through traffic. This might be tempered later by recognising the loss of the contribution of Harberton House and the garden landscapes as detracting from the significance of the area.</p>	<p>of past residential development on the loss of Harberton House and gardens and part of the gardens at High Wall on the significance of the area, including loss of historic and architectural interest, subdivision of land, density of development and intensity of use.</p>
2.24	<p>Pg. 35 RH Loss of residential character heading. CA character stated as strongly affected by residential uses. We have demonstrated that the predominant use along the frontage to Pullens Lane is not residential but institutional with schools, colleges and educational Halls of Residence making use of both converted Victorian properties as well as more modern construction. Thus the character is strongly affected by institutional uses. The appraisal states that growth of institutional uses has begun to erode this character, particularly development and subsequent redevelopment at Plater College and the construction of large</p>	<p>Most of the points made in this statement have been covered by answers above, which make the distinction between use and the area's special historic or architectural interest the character and appearance of which it is desirable to preserve and enhance.</p> <p>Rye St Antony School is recognised in the appraisal as having preserved the positive character features of large Victorian houses in large garden settings, whilst new institutional buildings are set away from Pullens Lane reducing their impact on the appearance of the route.</p> <p>The need to preserve the residential character of the lane was recognised in the 1973 Headington Hill Policy Statement and the 1977 Statement of Principles, which included measures to control the increase in motor traffic resulting from institutional use and the proliferation of</p>	<p>Actions identified above.</p>

	<p>blocks at the rear of Cotuit Hall. The use of these buildings is said to have increased intensity of activity in the area with resultant loss of tranquillity. Institutions are charged with introducing light pollution, aromas and institutional catering and loss of wildlife habitat. Yet Cotuit was first converted to an institution in 1917, Rye St Anthony in the 1930s and Plater in the 1970s. Insufficient weight is given to the established character of non residential uses along the lane which exist today.</p>	<p>signage within the street.</p> <p>Recent increase in intensity of use of the EFILS and EFA properties on Pullens Lane has increased the negative influence of institutional uses on the character of the area that the Policy statement, Conservation Area Designation and Statement of Principles were introduced to control.</p> <p>Reports of disturbance including illegal drinking and littering in the public parks in the conservation area resulting from institutional uses have increased in the past two years, for which local newspaper, television news reports and police statement provide witness.</p>	
2.25	<p>Pg. 36 LH Lanes are stated to now heavily used by pedestrians and cyclists with a rising number of motorists using these as a route to and from the many institutions and halls of residence. There is no evidence in support of this assertion regarding motorists nor any mention of extra trips inescapably generated by additional housing over the years. The 'rising number of motorists' do not include EF students who do not have cars. Instead, they are among those walking and cycling, which makes lanes less attractive to motorists (p.39). Parking at EF is limited to essential staff only.</p>	<p>Understanding of this section requires careful consideration of the grammar we have used. The traffic of pedestrians, cyclists and motorists moving through the area has increased as a result of institutional developments. This includes:</p> <ul style="list-style-type: none"> • Oxford Brookes University, use of the former Millham Ford School, which resulted in pressure for on-street parking in Feilden Grove addressed through introduction of a controlled parking zone. • Growth of student accommodation on land off John Garne Way has increased pedestrian and cyclists footfall through the conservation area. • Intensification of use of the EFILS site on Pullens lane to accommodate approximately 600 additional students, in addition to the intensification that occurred through development of Plater College in the 1970s has also increased the footfall on Pullens Lane. • The conversion of the former Youth Hostel at Jack Straw's Lane for a children's day nursery. 	<p>Add details on the Council's historic policies for Headington Hill and the designation of the conservation area.</p>

- Nationally documented trends in the use of motor transport for trips to schools, supports the general identification of trends in rising use of motor transport to access intuitions.

An increase in traffic at Jack Straw's Lane has been noted by the County Council and new traffic calming measures are being introduced, using Section 106 money from development at Oxford Brookes University's Gypsy Lane Campus, to protect cyclists and pedestrians and offset expected traffic impacts from their developments. The recent introduction of controlled parking at Franklin Road also appears to have resulted in an increase in the use of Pullens Lane by parents delivering and collecting students from Rye St Antony School. This has been documented photographically by two property owners on Pullens Lane.

A level of pedestrian and cycle traffic is desirable, and encourages the enjoyment of this special area, as well as restricting traffic speed. However, it has been our observation and that of local residents (confirmed by their photographic documentation), that at times Pullens Lane is congested as a result of the conflicting demands for pedestrians, motorists accessing institutions, local residents' requirements for access and larger goods vehicles including both local deliveries and construction traffic. Contrary to the opinion expressed by the commentator, EF students are reported to use taxis to get to their accommodation at Pullens Lane, generating traffic from the site in addition to the staff presence. Nevertheless, property owners within the conservation area have the right to access their property by car, as well as the right to receive deliveries and servicing by motorised vehicles. However, this demand and activity is not consistent with the special historic and architectural interest of the area the character and appearance of which it is desirable to preserve and enhance and which the Conservation Area was designated to allow the management of. Indeed, the inclusion of the following principles within the 1973 Policy Statement and the 1977

		<p>Statement of Principles demonstrate that there was concern at the time of the area's designation over the impacts of institutional uses on traffic pressures on the area's roads:</p> <p>"(6) substantial extensions to, or intensifications of, the existing institutional uses within the area north of Cuckoo Lane will not be approved, except where it is clear that no additional traffic will be generated over and above that which would arise from alternative ordinary residential development and where they otherwise comply with these principles" and</p> <p>"(7) Whenever possible the generation of further traffic in the area, and particularly on roads not fully upto Highways Standards, should be avoided".</p> <p>It is perfectly fair to state that the further development of the area for residential uses has increased the volume of traffic using the roads in the north of the area, resulting in some negative impact on its character and appearance. This reflects comments received from the Chairman of the Pullens Lane Association and should be reflected in the appraisal.</p>	
2.26	<p>P37 Object to text "<u>Density of development</u> Emphasising the sense of low density of development". Suggested amendment Add to end: "excepting the more exposed modern residential infill at Pullens Field."</p>	<p>The text referred to is part of a section that highlights the positive contribution of features of the area's character to its significance and relates specifically to properties retaining large Victorian houses. The introduction of modern institutional buildings or houses in close proximity to the road frontage might be regarded as intrusive to this part of the area's character. It might be appropriate to note that the setting of modern houses at Pullens Field does detract from this characteristic in the Issues section on Page 42</p>	<p>Consider amendment to issues section on Page 42 to reflect the change in character created by houses and institutional buildings built near the road frontage on Pullens Lane.</p>

2.27	Pg. 37. Object to text " <u>Density of development</u> Buildings are set well back ...ensures the lane is rarely overlooked ... Contributing to green and tranquil character" Suggested amendment to recognise visual impact of institutional buildings, add to end: More modern buildings constructed for the institutional uses along Pullen's Lane area well-screened from public view and do not impact on the identified character of the lane.	<p>In contrast to previous comments this comment suggests that if they weren't screened from view institutional buildings <u>would</u> detract from the character of the lane.</p> <p>The screening of the modern institutional buildings helps to reduce the negative impact on the area that they and their predecessors might have had, although glimpsed views to them are seen through the foliage. Nevertheless the avoidance or reduction of a negative does not equal a positive. This summary of significance is intended to identify the features that make a positive contribution to the area. If this isn't clear from the headings these should be reviewed.</p>	Review headings of tables of features contributing positively to the significance of the area.
2.28	P 38. Object to text " <u>Buildings</u> ... and add to the area's rural character" The area is not rural. Gardeners and coachmen are not indicators of rurality but rather of a wealthy city-based suburb." Remove text.	The presence of cottages, in addition to large houses in large verdant grounds provides features with a rural character. Nevertheless, it is fair to state that the buildings described are more interesting in illustrating the service culture that supported the large sub-urban houses, indicating the status of the University elite who occupied them in the late 19 th and early 20 th century.	Replace text with "and the service culture that supported their occupation"
2.29	P 38. Object to text "Enclosure ... area of tranquil residential character" No regard for long term existence of institutions in CA. Insert: area of more tranquil residential and institutional character"	We believe the responses above deal with this misunderstanding of the difference between use and the special historic or architectural interest the character and appearance of which is desirable to preserve or enhance.	No further action.
2.30	P 38. Object to text " <u>Tranquility</u> ... reflects its intended development as a high class residential area." Insufficient regard for the actual current situation. Reasons for this character should be sought in current conditions. It is likely a result of the private status of the lane and the relative lack of	<p>A reason for the successful development of the area in the late 19th century appears to have been its status as a private road and the absence at that time of through traffic. At certain times of the day this impression persists in Pullens Lane and is a feature of the area's significance which is desirable to preserve or enhance.</p> <p>It is interesting to note that the contemporary North Oxford suburb developed as a series of estates set off the Banbury Road, rather than</p>	No further action

	through traffic. There are high-class and historic residential areas in Oxford that are not tranquil e.g. Banbury Road. Remove text.	as ribbon development with later infill of land behind. The developments of Park Town, Norham Manor, and the Belbroughton Road area, as examples, create a series of areas of tranquil roads set away from the busy route of Banbury road as prestigious housing. Nevertheless the main road frontage was not wasted and has a different significance in providing the opportunity for prestigious, highly visible frontages.	
2.31	P 38. Object to text “Views ... Views over the city ... High class suburbs”. In effect, former views have been lost because of growth of trees. Indeed, the area has turned from a belvedere into a backdrop. Remove text.	Views over central Oxford are certainly still possible from the garden at High Wall and may still be possible from several other properties along Pullens Lane. The impact of tree growth has been noted elsewhere among the issues affecting the area but does not negate the positive contribution of these views where they survive or the potential to enhance the significance of the conservation area by using careful tree management to restore some views over the city.	No further action.
2.32	P 39. Object to text “ <u>Residential use (3rd para)</u> ... retaining this character”. Plays down the importance of preservation of original Victorian houses (mainly thanks to change of use to institutional use) by suggesting that only the retention of the original residential use is of significance” Insert: Retaining original Victorian houses.	This is a helpful amendment to clarify the meaning of the paragraph.	Insert suggested alternative text.
2.33	P 39. Object to text “Some academic use”. Why some? Whole of east side and parts of west side of the lane are in academic use.	Not all of the east side of Pullens Lane is in academic use, there are four private houses on this side of the road, in addition to the property of EFILS and Rye St Antony College, and 16 on the west side (including Pullens Field). The Vines is a student hostel not used for education, whilst any educational use of Cotuit Hall (i.e. the use of the Games/lecture room) is ancillary to its permitted use as a student hostel with use for conference accommodation during vacations	Consider including plan that compares current uses in the north of the area.

2.34	P 39. Object to text “Pedestrians etc. Residents are active in publicising ...” Fails to reflect significant role of institutional uses in supporting Pullens Lane Association. Insert: Properties fronting the lane are active.	A reasonable alteration to reflect the involvement of all frontage owners in the Pullens Lane Association.	Insert suggested text.
2.35	P 40. Object to text “Which has been bought by EF” Insufficiently precise: The identity of the institution is of no concern in a CA Appraisal. Change to: Which is now a language school.	This would presuppose that planning permission has been given for a change of use, which it has not. In fact the ownership of property can be of interest within a conservation area. In this case it provides information about the trajectory of change. It is of interest to note that the building is now owned by an organisation who propose to use it as a language school who are affiliated to another organisation on the same road. This is likely to require change and when considering change within a conservation area it is apposite to consider what vulnerabilities to the significance of the conservation area such change might impact on.	Change EF to EF Academy.
2.36	P 40. Object to text “Character description With little vehicle traffic and large houses set well back ... while the large houses and well timbered gardens.” Fails to recognise institutional uses as an integral and essential part of the established character or appearance of the Conservation Area. [Replace with] “With little traffic and large properties set well back ... while the large properties and their well timbered gardens”	In the absence of any evidence that the institutional use makes a positive contribution to the special historic or architectural interest of the area, the character and appearance of which it is desirable to preserve and enhance, the positive feature identified here is that the buildings set in their large gardens were built as houses for University professors and fellows, resulting in the area’s development in the 1880s and later. Nevertheless the statement that there is a little vehicle traffic is erroneous and needs to be qualified.	Amend “ ...with little vehicle traffic...” to ‘ at times, with little vehicle traffic’
2.37	P 40. Object to text “which contributes to its positive aesthetic value”. Addition needed to recognise the role of institutional uses in preserving original houses. Add: This has been preserved when original house have been	The Pullens clearly wasn’t preserved when its was demolished to make way for Plater College and the site subsequently infilled by EFILS recent developments. The buildings at the rear of Cotuit Hall have removed a substantial part of that house’ open garden setting, which has been identified by West Waddy ADP as having had a negative impact on the	No further action

	converted to institutional use.	property's contribution to the significance of the conservation area.	
2.38	P 41. Object to text "Likewise the very limited amount of street lighting which is supplied by the resident's [sic] ensures ... the introduction of security lights to the institutional has started to intrude on this quality" Fails to reflect important role on institutional uses in supporting and funding Pullens Lane Association. Fails to recognise that security lighting is fixed to residential properties with no control. Insert: which is supplied by the property fronting the lane ... the introduction of security lighting has started to intrude...	Both amendments are justified.	Replace with proposed text
2.39	P 41. Object to text "although local resident's [sic] have expressed concerns about noisy use of the lane at night ... which detracts from this peaceful atmosphere". This kind of comment has little place in an appraisal: it is untested and uncorroborated. Residents also use taxis from time to time and [sentence incomplete]. Delete text.	We have intentionally left this statement as an expression of the concerns of local residents as it is untested. Nevertheless it has been expressed by several residents of the area and should be taken into consideration given the changing pressures on the area. There may be potential to enhance the conservation area by addressing the sources of disturbance. Reports in the media during 2011 corroborate the assessment that late night anti-social behaviour in the area has increased in the last two years, including requirements for the involvement of the Police. In September 2011 Thames Valley Police, the city council, bus companies and language college heads met to discuss the issues of overcrowding on public transport, noise and anti-social behavior in parks, which were acknowledged by all parties. The impacts of intensified use of institutional sites were anticipated in the 1970s and the conservation area designated as a means of taking these pressures into account in decisions that could affect the area's significance.	No further action.

2.40	Pg.40. Object to text "The growth of trees ... may now have obscured. Tree growth has obscured views. Insert: the growth of trees will now have obscured.	In fact views to the city centre can still be appreciated from the Garden of High Wall and, therefore, may still be possible from other properties on the lane.	No further action
2.41	Pg.41 Object to text "Cotuit Hall is known to have a well established orchard". Historic mapping shows possibility of an orchard. This has not survived. Delete text.	The arboriculture report prepared for Cotuit Hall by Roy Finch Associates in March 2012, states that the western end of the property contains the possible remains of a fruit orchard mentioned in a sale catalogue of 1916. The text should be amended to reflect this.	Amend text to "Cotuit Hall is known to include the remains of a fruit orchard suggested by the 1898 Ordnance Survey map and recorded in a sales catalogue of 1916.
2.42	Pg.42 Object to text "Recent large scale construction projects ... road is in poor condition". This is irrelevant to this appraisal. The Pullen's Lane Association are responsible for the maintenance of the lane north of Cuckoo Lane and the main financial contribution for such maintenance comes from institutions fronting Pullens lane. Delete text.	In fact the area referred to is south of Cuckoo Lane. This is an area that no-one currently accepts responsibility for maintenance of, but which affects the amenity of many users of Pullens Lane including the institutions. The poor condition of the lane affects It may be unfair to attribute the damage to construction projects only, as there has been concern over its condition since, at least, April 2005 when it was the subject of a report to North East Area Committee.	No further action.
2.43	Pg.42 Object to text "The redevelopment of The Pullen's for Platter [sic] College in the 1970s reduced the contribution of the Victorian housing stock ...". The Pullens was actually 'Fairfield' when it was demolished and was described by Pevsner (1984) as 'an unpleasant house'.	Historic photographs record that it was a large and imposing house. It was the first of the group large redbrick houses built on Pullens Lane. Had it survived it would certainly have been regarded as making a positive contribution to the significance of the conservation area.	No further action.

2.44	Pg.42 Object to text “Bulky ad rectilinear ... characteristic domestic features”. Does not reflect minimal visual impact on CA. Add: These modern buildings are well-screened from view have a minimal impact on the setting of the lane. At Cotuit they were part of the established character when the CA was designated.	For the reasons stated above it appears that the conservation area’s designation reflects concern over the impact of the development of buildings of institutional character within the area, rather than accepting them as part of the established character. West Waddy ADP themselves have assessed the 1960s accommodation blocks at Cotuit Hall as having a negative impact on the significance of the area. Buildings, and other features, do not have to be visible from the public realm to be regarded as having a deleterious impact on the character of a conservation area.	No further action.
2.45	Residential use is stated as maintaining a quiet environment. The emphasis adopted by the appraisal seems calculated to avoid any analysis of the effect on the character or appearance of the Conservation Area of demolishing the original Victorian houses and building houses in every part of their landscaped settings. This failure is highlighted on p.40 RH ‘the retention of the majority of the older houses has ensured the survival of the lane’s character as an exclusive Victorian suburb’. But there is no attempt to consider the effect on the Area of the demolition of the remaining: It seems to be a ‘victimless crime’ according to this appraisal e.g. see Harberton Mead analysis, p. 43/4.	Indeed, the demolition of Victorian houses on Pullens Lane for residential development is a victimless crime because it hasn’t happened. The only Victorian house demolished on Pullens Lane was The Pullens/Fairfield, which was demolished in the 1970s for Plater College. The 1970s infill housing development at Pullens Field was built in a small field, which formerly belonged to the owner of High Wall. The demolition of the Edwardian House at Harberton House has denuded the area of a large building and resulted in infill development that has put pressure on the historic character of the conservation area. We have noted the need to address this in comments above.	
2.46	It is surprising to find in this conservation area appraisal such a minimal emphasis on original architecture and a minimal concern for the retention of existing buildings, particularly when some buildings are stated to be by ‘notable architects’ and are of considerable architectural	This appears to miss the assessment of the importance of buildings within the conservation area as elements that make a positive contribution to the special interest and character and appearance of the area on pages 21, 22, 23, 34 and 35. In addition to further references in the section on historical development. The importance of the Victorian and Edwardian houses to the suburban character of the area north of	No further action

	accomplishment' (p.38).	Pullens Lane is made on several occasions. Individual buildings that make a positive contribution to the significance of the conservation area are marked on Maps 2, 3 and 4.	
2.47	Pg. 40 LH states that 'the non-residential use were [sic] introduced ... in 1939'. But p. 12 RH states (correctly) that Headington School bought what is now Cotuit Hall in 1917 for their Junior School. This was only seven years after High Walls 'completed' the group (p.40 LH). So the Victorian and Edwardian development of Headington Hill survived at its purest extent as a residential enclave for only seven years.	Cotuit Hall (formerly Napier House) reverted to residential use in 1930, and had only a minimal impact on the character of the property. Rye St Antony School has had a more permanent impact on the use of properties in the conservation area.	Change Napier House (Cotuit Hall) was used as a junior school between 1917 and 1930 but later reverted to residential use. Rye St Antony School's use of The Croft (from 1939) and later Langham Lodge (from 1945) has been more long-lived.
2.48	(High Walls is also the only original house that remains in residential use. All the rest are in educational use or have been demolished to make way for housing estates)	This is a wildly inaccurate statement. Both Brockleys Cottage, Mendip House and Pullens End are still large Victorian houses that remain in residential use, The Vines is a residential facility for an establishment with educational facilities elsewhere in Oxford, whilst Cotuit Hall is considered to be a hall of residence with a very small amount of ancillary space that may been used as teaching space when not otherwise employed as a games room in the past. No houses on Pullens lane have been demolished to make way for housing estates.	No further action.
2.49	Institutions have therefore been an integral part of the CA for almost 100 years. Most institutional uses predate the Conservation Area designation and are properly to be regarded as	The points raised here have been commented on above at 2.14.	No further action.

	integral and essential part of the established character or appearance of the Conservation Area.		
3.0	Comments submitted on behalf of Scholarship and Christianity in Oxford, owners of The Vines, Pullens Lane		
3.1	We agree that it is critical that development along the lane consistently honour and reflect the rural and inviting character, which is both a features and attraction critical to its composition. As the owner of The Vines, SCIO is conscious of its responsibility to contribute to the life of Pullens Lane and ensure our own development plans are in character with the lane's rural character. As such, we support the writing of such an appraisal so long and so far as it does not unduly shackle reasonable development and enhancement or lead to additional bureaucratic management of the planning process, which is already quite unwieldy (we have just experienced this in our own request for minor changes to the Vines which took in excess of three months to process).	The City Council have a statutory duty to identify parts of their areas that have special historic or architectural interest the character and appearance of which t is desirable to preserve or enhance, and to have regard to the desirability of persevering or enhancing that character or appearance when considering planning applications. This means that applications affecting sites in or in the setting of a conservation area may be subject to different considerations than those outside. This is a legal process governed by legislation and national and local planning policy. The conservation area appraisal identifies the features of the historic environment that contribute to the significance of the conservation area: the special historic or architectural interest of the area with a character and appearance that is desirable to preserve or enhance. By providing information on the area's significance it is expected that applicants for planning permission will be better able to take this into account when developing their proposals resulting in fewer delays to the planning process resulting from the need to fulfil the statutory duty.	No further action
3.2	Section 3.7: I think the document inadequately specifies the mixed-use nature of Pullens Lane and the broader area by describing it as residential (from which a reasonable reader would infer domestic residences). While domestic residences are numerous and important to Headington Hill, this descriptor (e.g., the subhead 'Loss of residential	The elements of the historic environment that are identified as making a positive contribution to the special historic or architectural interest of the conservation area in the area north of Cuckoo Lane are associated with the development of the area as a Victorian residential suburb and this strongly affects the character and appearance that is desirable to preserve or enhance, including the use of the lane and its, at times, tranquil atmosphere. This paragraph could be improved to highlight the contribution of the Victorian and Edwardian buildings to the character of	Amend heading and paragraph 3.7 Loss of residential character to provide clarity on the impact of development on the Historic Suburban

	<p>character') as a sweeping and introductory way of approaching the area is inadequate. Educational institutions, like the one I direct, are equally prominent, if not more so along Pullens Lane. Space/land use surveys (I understand you are drawing up an additional map reflecting land use) demonstrate that such institutions are prominent and contribute to the character of the area. I think it far better and more accurate to describe the area as reflecting a rural character rather than a residential character. The latter term's insufficiency unduly prejudices the readers and those who may implement the document both now and in the future.</p>	<p>the area and the impact of the loss of one of these buildings, infilling of gardens and green space in their setting and the increasing intensity of activity in the quiet lanes.</p>	<p>Residential Character.</p>
3.3	<p>Section 3.1 (p. 32): subhead Residential character implies domestic. It would be appropriate and more balanced to also have a subhead and discussion of 'Academic Residences'. All the major types of use need to be presented in a similar fashion in terms of the structure of the report.</p>	<p>This section is focused on identifying the features of the historic environment that make a positive contribution to the significance of the conservation area. Institutional residential use or educational use (the other uses represented) have not been noted as making any notable positive contribution to the area's significance, whilst they have in the south of the conservation area. This is consistent with the assessment of the area's significance as presented when the area was designated a conservation area in 1977. The changing use of property in the conservation area is discussed in Section 1.3 of the appraisal. Nevertheless section 3.1 Residential character could be clearer in identifying the importance of the historic 19th and early 20th century houses in making a strong contribution to the character and appearance of the area.</p>	<p>Revise section 3.1 Residential character to provide clarity on the contribution of 19th and early 20th century houses to the significance of the area by creating its residential character.</p>
3.4	<p>Section 3.8.2: The Pullens Lane assessment offers the same insufficient description as above (e.g., the subhead: 'Some academic use').</p>	<p>On page 41 the appraisal states "A mix of residential and academic buildings helps to maintain an important balance of use", although this is</p>	<p>No further action.</p>

		<p>qualified by a statement that expresses local residents' concern over recent changes to the impact of use on the character of the lane. The bullet points on pages 37, 38 and 39 highlight the features of the historic environment at Pullens Lane that make a positive contribute to the significance of the conservation area. As has been argued above, the institutional use of property on Pullens Lane has not been identified as making a positive contribution to the significance of the conservation area. In this case the identification of 'some academic uses' recognises that this conservation area does form part of Oxford, a city that has an international reputation for its impact on the history of education, and that this makes a positive contribution to the historic interest of the city as a whole. The features noted as contributing to the character and appearance of the area are those that would be considered desirable to preserve and enhance.</p>	
3.5	<p>Section 3.8.2 Historical Commentary (p. 42): Surely one should note the problems with defining ownership and repair of Pullens Lane South as a contributory problem; it is not only construction and institutional traffic causing deterioration but also the lack of specified ownership and repair of the roadway!</p>	<p>This is a fair point and reflected in the comments received from a number of other respondents.</p>	<p>Revise statement on the poor condition of Pullens Lane South to identify the ongoing lack of maintenance and disagreement over ownership as contributing to this issue.</p>
3.6	<p>Might it be proper to note, where SCIO is listed as the owner/occupier of the Vines (as on p. 40) that it is used as a residence for students studying at Oxford University?</p>	<p>This provides evidence of the trajectory of change in the use of property in the conservation area.</p>	<p>Accept recommended change and insert text.</p>

3.7	<p>Finally, while I understand and share the concerns evolving from the development activity surrounding Cotuit Hall, this seems to have led toward some alteration of standard good practice. I am quite concerned about the process involved in producing this appraisal. I am grateful that you came to meet us at your initiative though it came at the 11th hour. This report has moved along quite quickly and there does not appear to have been sufficient notice and consultation in its creation. It will be an important document which, with some alteration, can provide a coherent and important basis for interpreting the landscape of the area. Something of such important and implication should be allowed the full and proper time for review since it will be applied to planning matters and be influential for years to come.</p>	<p>The preparation of the appraisal has complied with the best practice identified in the latest guidance published by English Heritage, which states that consultation should be undertaken after the preparation of a draft appraisal document accompanied by an electronic comments sheet/feedback form to involve the wider community.</p>	<p>No further action</p>
4.0	Representation on behalf of Headington Hill Residents Association		
4.1	<p>We consider the Character Statement in 'No.1 Headington Hill Enclave' pp 25-27, accurately reflects our submission, but would like added in the first para that we used the Oxford Character assessment Toolkit.</p>	<p>Noted</p>	<p>Amend text as requested</p>
4.2	<p>On P. 28, under 'Issues' for our community, please add to the effects on our amenities listed in para 1, the fact of the overpowering visual impact of the 5-storey rectangular mass of Brookes' NTLB. Please also add the latter</p>		

	factual building to the list, p 2, under “Development with intrusive architectural character.		
4.3	Identify the Headington Hill enclave as an important feature of the conservation area in the summary on page 1. At present the division of the area into north (residential) and south (institutional) fails to recognise contribution of the enclave to the historic and architectural interest of the conservation area. Insert text “the southern part of the hill contains the public parks of Headington Hill and South park, together with Schools, Oxford Brookes University, and a residential area. ”	Noted. The summary section needs to recognise the significance of this area as the surviving nucleus of the hamlet of Headington Hill as it was identified in historic documents.	Insert text “the southern part of the hill contains the public parks of Headington Hill and South park, together with Schools, Oxford Brookes University, and the residential area of the historic Headington Hill hamlet”
5.0	Representation by West Waddy ADP on Headington School		
5.1	On page 13 please replace the last sentence of the first paragraph with: <i>‘The school continues to invest in its infrastructure, with additions of an Art facility (1998), Theatre (2002), Dining Hall (2005), Music School (2009) and most recently, a new classroom facility (2012).’</i>	Replacement text provides useful detail on dates and naming of buildings.	Accept replacement text.
5.2	On page 19 at the end of the fourth paragraph please remove the reference to <i>exclusivity</i> , which is inappropriate. An alternative wording for the final part of this sentence is suggested as: <i>‘...part of Cuckoo Lane provide privacy and hint</i>	At the request of the institution we are happy to describe their property in these terms.	Accept replacement text.

	<i>at the tranquil oasis that lies beyond, which is a key feature of this prestigious establishment.'</i>		
5.3	On page 23 at the end of the third paragraph please refer to the 'Music School' rather than 'music room'.		Accept replacement text.
5.4	Secondly there are some more serious issues to raise. The grounds of Headington School form approximately 12% of the Headington Hill Conservation Area. As such Headington School is a major stakeholder and yet Oxford City Council has not consulted with the School in the preparation of this document, whereas, it appears that there is significant input from local residents. This has led to an unbalanced picture that seems to favour the concerns of the local residents.	The consultation of local residents in early data gathering for the development of an appraisal is best practice identified by English Heritage in their published guidance and provides an additional resource for assessment that is not otherwise available to the Council. The consultation between June 26 th and July 24 th 2012 has provided an opportunity for institutions and other stakeholders within the conservation area to comment on a draft of the appraisal with the potential to request amendments to the document. This is also best practice as identified by English Heritage.	No further action
	As an example of this, under the 'Issues' section on page two of the document there is reference to the tension between the institutional buildings and the <i>historic residential character of the Conservation Area</i> in relation to their intrusive architectural nature. Whilst some buildings may have been well regarded when constructed, but no longer hold lasting merit, there appears a clear statement that the Conservation Area has only a <i>residential character</i> , which is at odds with the reality of its composition. The grounds and buildings of EFI, Oxford Brookes University, Rye St Antony, Cheney and Headington Schools together comprise a significant proportion of the Conservation Area and all have varying numbers of <i>institutional</i> buildings. This apparent presumption that the character of the Conservation Area is entirely <i>residential</i>	This comment is incorrect. The appraisal states on Page 2 that educational institutions in the south of the conservation area contribute to the positive features of the conservation area and that these dominate the character of the southern part of the area. On page 18 the Institutional character of the southern part of the conservation area is identified further among the positive characteristics of the conservation area whilst Headington School is identified on page 19, where the school's long history, prestigious reputation attractive grounds and dominating main school building are all described as positive features of the area that contribute to its significance. Oxford Brookes is described similarly in the preceding section (pages 18 and 19) and Cheney School in the subsequent one (page 19). The property of EFILS is not considered to make any significant contribution to the character of the conservation area and, indeed, the density of development, intensity of activity and rectilinear form of architecture are all considered to be features that detract from the special features of the conservation area.	No further action.

	<p>appears to permeate throughout the report and is both inappropriate and incorrect.</p>	<p>Rye St Antony School are also a well-established school with a long history in the conservation area. However, they have succeeded in retaining much of the character of the Victorian houses that they occupy along with their gardens. Nevertheless they have not made an architectural contribution to the conservation that contributes meaningfully to the significance of the area. They have been good caretakers of the historic environment.</p>	
	<p>Headington School, as an institution, has been located on the site for over 90 years and it is therefore suggested that the Conservation Area includes the School because of its historical stewardship of the area and therefore that the character of the Headington Hill Conservation Area is a mix of residential and institutional where institutional buildings actually create and establish much of the character of the area. Indeed, Headington School's grounds are a good example of the balance that can and has been struck between residential, recreational and academic (institutional) areas.</p>	<p>Indeed, Headington School's history in the conservation area is summarised on page 12 – 13, the contribution of the school to the institutional character of the area is described on page 19, the contribution particularly of its main building and the retention of the house, grounds and subsidiary structure of Davenport House on page 16, the school's walls on page 18, in views from Headington Road and the views across its playing fields on page 20, and the significance of the main school building on page 23 (in addition to the earlier structures of Davenport House on page 23). Headington School is not neglected as a significant part of the conservation area.</p>	<p>No further action</p>
	<p>A second example of the possible bias in the document is on page 24 of the document where there is reference to the 'serious problem' caused by parents delivering children to local schools. This comment is totally unqualified and is an example of local residents' opinions being utilised within the report without evidence.</p>	<p>Our own observation and photographic evidence supplied by local residents demonstrate that schools traffic demonstrated that there are issues with traffic for the schools in the area at peak traffic times, with overspill traffic using Pullens Lane from drop-off and collection. This is further evidenced by the damage to grass verges in the lane resulting from parking of cars. This matter was raised at a public Headington Ward Focus Meeting in August 2011 at which the Bursar of Headington School stated that the school was working with parents to reduce the use of private cars to deliver children to school, but that the delivery of pupils still contributed to the congestion on surrounding roads.</p>	<p>No further action.</p>

		Nevertheless, where statements in the appraisal are based largely on the reports of local residents we have qualified these as such, until such time as they can be further verified.	
	Furthermore, the majority of the parents who do drive to Headington School use Headley Way and London Road – neither of which enters the Conservation Area. Access to the other schools would also seem to fall outside of the Conservation Area. Thus it is suggested that the stated concern (if of any substance) is not relevant to the Appraisal. The document also appears to ignore the significant and steady increase in domestic car ownership across all residential areas in Oxford, and hence also within the Conservation Area, which cause not only traffic problems but is also leading to the digging up of front lawns to provide new driveways.	<p>Headley Way is in the setting of the conservation area, whilst the use of Pullens Lane by parents to drop-off and collect children is documented as an issue.</p> <p>Rising private car use within the city is an issue that isn't documented in the appraisal, we will update the text to reflect this.</p>	Amend appraisal text to reflect the impact of rising traffic impacts resulting from residential property owners.
	In summary, the Appraisal fails to accurately reflect the true nature of the Conservation Area and the opinions of all its occupants. Consulting with local residents, but not Headington School (and by implication other significant institutions) has resulted in a number of inaccurate or inappropriate value judgements and unqualified opinions being contained within the report. The Conservation Area Appraisal is therefore regarded as unbalanced, biased and even anti-institutional.	The appraisal assesses the significance of the conservation area including the dfeatures that contribute positively to its special historic or architectural interest the character and appearance of which it is desirable to preserve or enhance. The consultation undertaken between 26 th June and 24 July 2012 has provided an opportunity for all occupants, including institutions to influence this assessment. This is best practice as described in English Heritage's published guidance. The appraisal is not anti-institutional but seeks to identify where in the conservation area institutional uses have made a positive contribution to the area's significance and where they have not or, at worst, where they have been deleterious to its character. This provides consistency with the principles that underlay the area's designation as a conservation area in the 1970s.	No further action.

