

FOIV response to the consultation on the 2040 local plan

Friends of Iffley Village (FOIV) is the residents' group for anyone who lives in Iffley or has an association with the village. The organization is run by its management committee, which deals with matters arising such as proposed developments, parking, and other local issues. It also organizes events during the year. Although it has no formal role in connection with the Oxford City Council, it is usually consulted in matters relating to planning decisions.

This representation by FOIV addresses key areas of local concern in relation to the 2040 Local Plan (LP2040) under the following headings:

1. Landscape Character Appraisal (LCA)
2. Former Iffley Mead Playing Fields 104 [SP38]
3. Land at Meadow Lane Site 389 [SP42]

Background Papers

4. Housing need and requirement
5. Housing Site Assessment Process / HELAA
6. Green Infrastructure
7. Flood Risk and Drainage
8. Habitats Regulations Assessment
9. Lack of accuracy and coherence in public communication and consultation

1. Landscape Character Appraisal (LCA)

It is unclear whether consultees are being invited to comment on the LCA, but comments are provided below.

We are concerned that there are a number of inconsistencies between the section of the LCA that describes Iffley Village and the 2009 Iffley Conservation Area Appraisal (ICAA), noting that the latter was subject to thorough consultation and public input.

In particular there is an unevidenced shift of nuance toward describing Iffley Village in terms of a suburban character, in contrast to the 2009 ICAA which recognizes and places great value on the Village's retention of a rural character. The 2009 appraisal also notes the important contribution that the village's undeveloped green spaces (whether publicly accessible or otherwise) make to the ICA and indeed places these at equivalent or near equivalent importance to the integrity of the ICA. To some extent this continues to be reflected in the LCA, but that renders parts of the LCA incongruous with the suggestion that there has been a deterioration of landscape quality since 2009.

We do not believe that the factual position has substantively changed since 2009 sufficient to justify any demotion of the particular and important attributes that support the ICA. In particular we are not aware

of any developments that could have contributed to any such change. The Remy Place sheltered housing development was underway in 2009 but it is widely acknowledged that this development, by virtue of its design, style and the materials used, represented an improvement on the previous sheltered housing buildings. If anything, therefore the evidence is that the integrity and quality of the ICA has been enhanced since 2009, rather than the other way round.

We also question the adequacy of the attention given to biodiversity in the LCA. Whilst we agree that biodiversity has relevance to landscape character, the comments on this matter in the LCA are cursory and appear to be based on nothing more than a review of open access GIS information by a non-expert. It is notable that, as with the suggestion of a shift from an essentially rural to suburban character, that the remarks are unevidenced.

We are unclear why Site 389 has been omitted from green infrastructure assets as defined and mapped in the Oxford City Green Infrastructure Study (2022).

FOIV asks the Council to note these inconsistencies and that elements of the LCA it is seeking to rely upon as part of the evidence base for the LP2040 are open to dispute on grounds of both fact and interpretation.

On the other hand, FOIV warmly welcomes the recognition of the threats to landscape quality, and the ICA, that are presented by infill development, especially on greenfield sites within the ICA.

2. Former Iffley Mead Playing Fields 104 SP38

FOIV has always supported the principle of development of this site for affordable housing.

There are considerable problems around access and we await a proposal in order to be able to comment further.

Under SA Objective 3: description of land is given as 'fenced off grassed area with scrub' is inaccurate. There are a number of trees on the site, including hawthorn, ash and walnut, which will need protecting.

Under SA Objective 7: Ecology and biodiversity. There will need to be a thorough examination of the site, as it is used by various species of animals (foxes, two species of deer, etc.) whose use of the site will need to be protected.

https://www.oxford.gov.uk/downloads/file/8179/site_assessment_104_former_iffley_mead_playing_field

3. Land at Meadow Lane Site 389 [formerly SP42]

FOIV's view is that failures in the original site allocation process mean that it should not have been allocated in the first place. This is a prime site for protection **not** development. It should be removed from LP2040.

"Land at Meadow Lane" is the last remaining area of ancient meadows in the Iffley Conservation Area.

In a recent survey of FOIV membership (around 361 members at that time), 78% of respondents were in favour of keeping the Land at Meadow Lane green, and 81% said that the proposed development would have a negative impact on the Quiet Route along Church Way and Meadow Lane. The stance of the

Friends of Iffley Village is that Land at Meadow Lane is integral to the character of the rural conservation area and as ancient biodiverse meadow should be protected.

The City Council agreed with FOIV's stance in 1994 in response to a previous attempt by the landowner to have "Land at Meadow Lane" allocated a Local Plan of that year. In summary FOIV's position at that time was "the 3.5 acre area between Church Way and Meadow Lane is an important and special part of Iffley. It contributes significantly to the integrity of the Conservation Area..." This has not changed.

The following fundamental points are relevant:

Conservation Area status: Any development of Land at Meadow Lane fails to conserve and protect the 'strong rural characteristics' identified as a key feature in the Iffley Conservation Area Appraisal (2009) and in fact will deliver very substantial harm to these assets. These last remaining open fields are what preserve the unique, rural character of Iffley described in the ICA. This harm applies to views into and out of the ICA as well as the integral fabric of the ICA itself.

County Council Principal Quiet Route: Church Way and Meadow Lane are part of the designated Principal Quiet Route OXR 18, heavily used for leisure and active travel by cyclists, joggers, walkers, families with prams, mobility scooters, and horse-riders. We understand that this fact was missing from the allocation that was presented to the Inspector of the 2036 Local Plan. Any development of "Land at Meadow Lane" fails to take into account the substantial harm that increased vehicular traffic will have on the Quiet Route at a time when OCC policy is to create Low Traffic Neighbourhoods, increase active travel and reduce congestion, air pollution and carbon emissions.

Ecology: The site was allocated in the 2036 Local Plan on the basis of a cursory look over the gate with no proper survey. The site includes an active badger sett and both fields are foraging grounds. This is a protected species and should certainly have been mentioned in any ecological assessment prior to allocation. We are very concerned that the Council allows such inadequate assessment to form the basis of decision-making with an irreversible impact on our environment. This is contrary to the "BGP 7 - Green Infrastructure background paper" (our underline):

"As such, one set of policy options proposed in the consultation relate to the protection of the existing green spaces (which taken together are referred to as the green infrastructure network) and ensuring that any proposals that would result in loss are subject to rigorous justification."

The City Council's actual approach is the opposite of this policy. The progression of the climate, environmental and social crises since the 2036 Plan was adopted make it even more pressing that no planning application should be made for this site and that Land at Meadow Lane should be removed from the 2040 Local Plan.

https://www.oxford.gov.uk/downloads/file/8206/site_assessment_389_land_at_meadow_lane

4. Housing need and requirement

It is accepted that there is a crisis of affordability. This is being escalated by the City Council's plans for massive growth to include 25,000 new tech jobs, which will further increase demand for homes and house prices and put more strain on Oxford's failing infrastructure. Instead of the focus on new housing sites, to address this issue the Local Plan should release and improve existing stock, unlock landbanks

and repurpose other use classes. Significant housing delivery could be achieved by revisiting previous allocations reserved for employment, such as the Oxford Business Park at the end of Cowley Road, large parts of which have lain dormant and undeveloped for decades. These brownfield sites should be reallocated to meet Oxford's housing crisis before any development of greenfield sites.

5. Housing Site Assessment Process / HELAA

This paper presents, as a fait accompli, a site assessment process informed by a 2022 update to the HELAA, Urban Design Assessments (2022) and 'Site assessment proformas' (also 2022). It is unclear whether comment is being invited on these as part of this consultation. This is a major deficiency of the consultation process as these documents inevitably set the trajectory of travel for subsequent stages of the Local Plan. Moreover, a review of the sites listed at Appendix B of the HELAA finds the site assessment pro formas to be subject to basic factual errors (for example Site 389, Land at Meadow Lane, Iffley makes reference to existing uses comprising a hotel – but this is a greenfield site). The Sustainability Assessments for these sites, and their performance against the 'Suitable, Achievable, Available' criteria from the HELAA guidance are therefore flawed without such errors being corrected. The Council should be engaging in a transparent process that makes it crystal clear **what** is being consulted upon, **what** decisions that will inform and **what** decisions have already been made at this stage of the LP process. To fail to do so wholly compromises the meaning and worth of the consultation.

6. Green Infrastructure

The paper reporting on the Council's responses to the initial issues consultation feedback outlines some useful initiatives that will assist in ensuring the 2040 LP meets its objectives in respect of protecting existing green sites and unlocking or expanding others. However there appear to be no concrete actions inviting public participation in this process as part of the Reg 18 consultation and this is a further flaw of the process. For example, the public do not appear to be being invited to nominate a Local Green Space designation (per the National Planning Policy Framework) nor to pass comment on the performance of biodiversity net gain policies ("BNG") to date, to inform improvements.

The Council's performance on biodiversity net gain appears to be falling onto the trap of taking metric calculations proffered by developers at face value. It is unclear whether any further resource is being allocated to the significant burden of reviewing and vetting BNG calculations (and Urban Greening Factor calculations) that will come with the secondary legislation on this matter underpinning the Environment Act 2021, nor indeed the proposed Local Plan policies around this issue.

7. Flood Risk and Drainage

In the light of climate change trajectories, the Council should not be contemplating any development within Flood Zones 3a or 3b, except in wholly exceptional circumstances where an appropriate strategic response is secured that results in a net reduction (e.g. 10%) to overall flood risk at a series of 'bellwether' sites that have been flooded in the past or which plan-wide modelling suggests could be at risk of flooding in the future.

The opportunity should be being taken through plan-led policies to diversify surface drainage channels for the benefit of upstream storage and reducing flashiness, where consistent with the requirement to avoid exacerbating flood risk. A prime example local to Iffley is the lower reaches of the Boundary Brook which could be restored to a more naturalistic channel subject to appropriate modelling and design.

8. Habitats Regulations Assessment

It is unclear whether the impact of the Council's various policies to control traffic movement within the bounds of the Oxford Ring Road, including the clean air zones, LTNs and proposed bus filters, have been fully and properly factored into the assessments of Average Annual Daily Traffic change arising from the Local Plan. All of these initiatives have the potential to increase traffic on the A34 (where it passes Oxford Meadows SAC). This is a significant flaw in the HRA and something that should be remedied prior to the adoption of the HRA. It may also have implications for other policies (such as housing delivery).

9. Lack of accuracy and coherence in public communication and consultation

We point out above that Site Assessment 389, Land at Meadow Lane, Iffley made reference to existing uses comprising a hotel – whereas this is a greenfield site. The document has recently been corrected online following our email to the City Planners. We are concerned at slapdash preparation and expect that considerably more attention is given to the accurate preparation of papers at the next consultation in planned in early 2023 when all the evidence papers become available. The public should be made fully aware of site allocations in their neighbourhoods, with clear explanatory maps on what is proposed, in order to make informed comment and genuine engagement.

Although we understand that every home in the city should have received a questionnaire, no one in Iffley has received one. This is a repeat of the situation in 2018 for the 2036 LP Consultation. We are aware that other areas in Oxford have also not received the questionnaire. Please could you clarify how many questionnaires for delivery to Oxford households were issued by the Council in order to allay FOIV's concern that the consultation process is woefully inadequate.