

SPS13: unsound - not justified, not effective, not consistent with national policy

### Response to Oxford Local Plan 2040 consultation from Friends of Iffley Village (FOIV)

1) Please note that on 12 November 2022 FOIV submitted views to inform the development of LP2040. For ease of reference, that document is sent again as an attachment with this submission.

PLEASE ALSO note that FOIV submitted a further response to LP 2040 CONSULTATION on **08 MARCH 2023**, which is copied below for ease of reference.

TODAY WE REITERATE THE POINT THAT 'LAND AT MEADOW LANE'/HORSE FIELDS (now known as SPS 13) is NOT SUITABLE for development, and its allocation should now be removed from the Plan. Many of the reasons why are laid out below, and in the attached documents, which were previously submitted on 8/3/2023 and should already be on file.

IT APPEARS THAT NO NOTICE HAS BEEN TAKEN OF ANY OF THE POINTS MADE BY FOIV AND ITS PROFESSIONAL CONSULTANTS.

2) Please note that there are also several other documents attached herewith, including the Council's Site Assessment chart for 'Land at Meadow Lane' in its application 22/03078/FUL.

3) Then there are FOIV-commissioned expert reports on Heritage, Landscape, Hydrology, Transport and Ecology, plus an overarching Planning Assessment Report by Mark Wood Associates, with 11 appendices.

4) We are aware that the current LP2040 consultation seeks to focus on housing need, which we addressed in our earlier submission (attached). However we would like now to submit additional information and new evidence to inform the site allocation decision of LP2040 with regards to proposed allocation HELAA reference 389 land at Meadow Lane and Church Way. **We believe these submissions provide convincing evidence that this site should not be allocated in LP2040. Housing development at this site would cause substantial harm to a designated Conservation Area, destroy a possible Oxford City Wildlife site and important habitat for rare species, and increase flood risk.**

5) The application's site assessment (attached) is inaccurate and based on poorly researched assessments that appear to have been carried forward from the preparations for LP2036. However, new evidence indicates this site should rather be classed as an Oxford City Wildlife Site for its national-, county- and city- classed rare biodiversity.

6) Furthermore, the independent hydrology review by Water Resource Associates indicates significant flood risk for nearby properties as well as on the proposed site. This is borne out by the Environment Agency (statutory consultee) in its objection to the current planning application. The independent Heritage review, by Orion Heritage, also indicates that it is not possible to protect and enhance the Iffley Conservation Area by building on this site, rather it would cause **substantial harm** to the ICA. This goes against the Council's own policy (SP42) and associated requirements.

Development would also introduce significant safety risks to the designated Quiet Route OXR18 for safe travel by cycle, mobility scooters and pedestrians.

7) Since November 2022 and the submission of a planning application for consideration on 28 December 2022, FOIV commissioned independent assessments of the ecology, heritage, landscape, hydrology, transport and safety considerations for this site. The independent Planning Assessment (by Mark Wood Associates) and detailed analyses and data are attached here to help inform the Planning Department's consultation for LP2040.

8) As indicated in these reports, the site is not suitable for housing development and would cause substantial harm to the Iffley Conservation Area (ICA). It will not deliver a sustainable development because the evidence which forms the basis for the allocation is both noticeably deficient and either inaccurate or poorly assessed. The application's site assessment fails to properly acknowledge the site's importance to the city's green infrastructure, contribution to the distinctive qualities and character of the village, its biodiversity importance and its impact on the ICA and to the setting of heritage assets.

9) The substantial technical evidence FOIV submitted in objection to the planning application (22/03078/FUL) demonstrates clearly that the site is not suitable for housing development, and that the significantly harmful impacts cannot be mitigated or compensated. The proposal therefore fails to accord with the importance the government places on plans being up to date and based on evidence which justifies its policies. The attached Planning Assessment by Mark Wood Associates refers to various appeals where Inspectors have concluded that where the evidence underpinning a site allocation has been lacking in rigour and provides inadequate justification for the development, permission should be withheld. These cases are included in the Appendices to the MWA Planning Assessment.

10) The allocation of this site [Policy SP42 in LP2036] is an aberration and is out of date given the information which FOIV has prepared and submitted to the Planning Department. It will not deliver a sustainable development because the evidence which forms the basis for the allocation is deficient and inaccurate.

11) Thus on the basis of the substantial technical evidence submitted in objection to the proposed scheme, site allocation 389 is out of date because it has been in effect overtaken by convincing and well-founded technical information which confirms that the site is unsuitable for housing development.

12) Our conclusions are further confirmed by the many objections to the planning application (22/03078/FUL) that is currently under consideration. These objections include statutory consultees such as the Environment Agency and Natural England, and also from institutions and groups such as BBOWT, Buglife, Cotswolds Rivers Trust, Plantlife, CPRE, Cycling Campaign for Oxford, the Oxford Pedestrians' Association, Oxford Rivers Improvement Campaign, the Oxford Civic Society, the Oxford Urban Wildlife Group, Windrush Against Sewage Pollution, the Iffley Fields Residents' Association, the Oxfordshire Badger Group, and more than a thousand objections from individual members of the public.

13) Finally, it was noted that the Oriel Field was not allocated for housing in the 2036 Local Plan. We hope that this continues to be the case, especially as Oriel College has earned the gratitude of many people in the local area and beyond for having provided such a welcome amenity which is much appreciated, and ensured the attractiveness of the Meadow Lane Quiet Route.

With best wishes

Ms Troth Wells

Chair, Friends of Iffley Village (FOIV)

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