

## Friends of the Fields Iffley response to Reg 19 consultation on the draft Oxford 2040 Local Plan

Friends of the Fields Iffley (FOFI) is a local community group formed to save the ancient meadows in Iffley, and the Designated Quiet Route that borders them, from the threat of development.

This response is on behalf of the 539 registered supporters on FOFI's mailing list.

### Policy SPS13: Land at Meadow Lane

Currently known as SP42 in the 2036 Local Plan, the allocation of this land for housing in the Oxford 2040 Local Plan is **NOT sound** and **NOT sustainable** and should be removed from the 2040 Local Plan for the following reasons.

### NOT POSITIVELY PREPARED

The HELAA assessment of Land at Meadow Lane SPS13 fails to make realistic assumptions about the constraints and suitability of this site for housing as required by the NPPF.

#### Policy Constraints

*The HELAA includes the following policy constraints:*

- Entire site within Iffley CA
- Within View Cone
- Site is part of supporting GI network and adjacent to part of Core GI network (Oriel Meadow)

But the HELAA **omits** the following policy constraints:

#### 1. SPS13 qualifies as a City Wildlife Site (OCWS)

Recent ecological assessments of this site by the applicant (Oxford City Council's wholly owned housing subsidiary Ox Place) show that it qualifies as an OCWS and as such should be protected as a core green and blue space at the top of the hierarchy by **Policy G1A Protection of Green Infrastructure**.

Rather than *supporting GI network and adjacent to part of Core GI network (Oriel Meadow)* which is a capped landfill site, Land at Meadow Lane is ancient unploughed meadow dating back to the Domesday Book and should have core GI network status in its own right.

2. **SPS13 qualifies as a key site in Oxford's ecological network**, situated along 3 of Oxford's 6 wildlife corridors as identified in the Green Infrastructure Study and should be protected by **Policy G 6 Protecting Oxford's Biodiversity including the Ecological Network**.

**3. SPS13 represents inefficient use of land**, counter to **Policy H1** due to the conservation area restrictions

#### Environmental Constraints

HELAA includes:

Flood Zone 2 (13%)

Flood Zone 3a (4%)

Flood Zone 3b (3%) (greenfield)

Within 200m of SSSI

HELAA omits the environmental constraints of:

1. **Difficult access to SPS 13** via the narrow lanes which borders 2 sides of this site. These lanes are a designated Quiet Route for Active Travel and any increase in vehicle traffic, either for construction or residential access, make this route unsafe for the hundreds of residents, many of whom are vulnerable users, who use this route for leisure and commuting, and for visitors to this historic village.

Suitability

HELAA states:

Planning application 22/03078/FUL (yet to be determined) establishes that site is suitable for residential uses.

However, this very sensitive site is **unsuitable** due to its:

1. **Location in rural Iffley Conservation Area** which the heritage survey shows would cause substantial harm.
2. **Location in Flood Zone 2 (13%) and Flood Zone 3 (7%) with no viable FRA**

The Environment Agency opposed development due to flaws in the FRA. These flaws are not addressed by the applicant's FRA revision submitted in December 2023.

**NB** The adjacent site Land at Church Way (HELAA reference number 388) also owned by Oxford City Council is identical in terms of Conservation Area status and flood risk but these were given as justification for the **unsuitability** of that land for allocation which is wholly contradictory application of the same policies to adjacent land.

3, **Core green infrastructure role** as a multifunctional historic wildlife meadow:

- ancient meadow that qualifies as Oxford City Wildlife Site
- situated close to 3 of Oxford's 6 wildlife corridors
- climate mitigation (urban cooling, carbon sequestration, drought and flood protection, reducing water and air pollution)
- health and wellbeing for local community and users of quiet route for active travel

- key visitor destination

4. **Risks to SSSI Iffley Meadow** not mitigable by the FRA proposal

5. **Difficult access** that threatens viability and historic rural character of Designated Quiet Route for active travel.

## 2. NOT JUSTIFIED

There are reasonable and much more suitable alternatives for affordable housing:

In Oxford on the hundreds of acres of brownfield sites currently designated for employment. The 2040 Plan already makes provision for change of use from employment to residential use in **Policy E1 Employment Strategy: residential development on employment sites**, stating that:

*Proposals for residential development on any category of employment sites will be assessed by a balanced judgement which will consider the following objectives d) the desirability of meeting as much housing need as possible in sustainable locations within the city*

In Iffley, just 300m away from Land at Meadow Lane, **SPS 14 Former Iffley Mead Playing Field** is a 2 hectare site in FZ1, much more suitable for development as it allows a much larger number of homes, at higher density housing, in a car free development without any harms to the Iffley Conservation Area or to the designated Principal Quiet Route, fewer harms to biodiversity and a much lower flooding risk. Increasing the proportion of affordable homes on this County Council owned land would easily accommodate the modest number of affordable homes planned for Land at Meadow Lane.

## 3. NOT EFFECTIVE

Not deliverable during the plan period due to multiple flaws in the planning application which fails to meet planning policies for biodiversity, heritage, traffic, flooding and impacts on Iffley Meadows SSSI. Over 1000 objections have been received to the planning application in January 2023 including the Environment Agency, BerkshireBuckinghamshire and Oxfordshire Wildlife Trust, Buglife: the Invertebrate Conservation Trust, Windrush Against Sewage; Pollution Cotswolds Rivers Trust, CPRE Oxfordshire, CycloX: the Cycling Campaign for Oxford, Oxford Badger Group, the Iffley Fields Residents Association, the Oxford Rivers Improvement Campaign, the Oxford Civic Society, Oxford Pedestrians Association, Oxford Urban Wildlife Group, and a Holding Objection from Thames Valley Police.

## 4. NOT CONSISTENT WITH NATIONAL POLICY

1. **NPPF**: The development plans are unsustainable and disadvantage current and future generation due to:

- harms to Oxford's core ecology, significant carbon footprint (excavation of ancient meadow, construction, operation, increased car use, reduced active travel) and loss of protection from the climate and nature emergencies
- community wellbeing and sense of place of Iffley's rural history and landscape. Appendix 6.1 about Oxford's conservation areas states that "It is the protection of these elements

that need to be properly managed, ensuring future generations will value and enjoy their special qualities. ”

## **2. Biodiversity commitment for 30% of land set aside for nature by 2030.**

Increasing pressures on landscapes and biodiversity arising from development on greenfield sites, illegal levels of air and water pollution, as well pressures of extreme weather of climate change are harming Oxford’s biodiversity.

Oxford is still currently well placed to deliver this national commitment by protecting and enhancing green/blue infrastructure to increase biodiversity and connectedness of precious green spaces in the city. If it develops sites like this ancient meadow, the opportunity will be gone forever.

SPS13 represents key core green / blue infrastructure, providing a host of ecosystem services in the city at a time of multiple planetary and societal crises. Land at meadow lane provides multi-functional benefits including for health and wellbeing, biodiversity, water management and climate change and should be protected from development and removed from the 2040 Local Plan.

### Solutions

Impacts on existing biodiversity can easily be avoided by prioritising brownfield sites for homes rather than employment and retaining and enhancing existing green spaces for wildlife and flora and connectivity with the wider ecological network to enhance biodiversity across the city.

## **3. UK’s national target to reach net zero by 2050:**

The embodied carbon emissions associated with this development plan are particularly high given the undisturbed meadow soil as a store of carbon over the centuries but have not been calculated. As this would makes up the majority of the carbon impact of this development this is a significant error.

**For all the reasons given above, SPS13 Land at Meadow Lane should be removed from the 2040 Local Plan.**