

**OXFORD LOCAL PLAN 2040 EXAMINATION  
(PART 1)**

**HEARING STATEMENT**

On behalf of:

Friends of Iffley Village (FOIV)

and

Friends of the Fields Iffley (FOFI)

May 2024

## 1. Introduction

- 1.1 This Hearing Statement has been prepared in response to the Part 1 Matters, Issues and Questions identified by the inspectors presiding over the Oxford Local Plan 2040 Examination. It is intended to assist the inspectors' consideration of the soundness of the Plan (and related matters such as whether it has been positively prepared with due cooperation between the City Council and relevant stakeholders) and it will form the basis of oral submissions at the Examination hearing sessions scheduled for 11-13 June 2024, should further elaboration on the points be required at that time.
- 1.2 The statement has been prepared jointly on behalf of Friends of Iffley Village (FOIV) with the support of Friends of the Fields Iffley (FOFI). FOIV has an express remit of protecting the Iffley Conservation Area (ICA) and the special attributes of Iffley Village: an area treasured by Oxford residents as a 'village within the city'. FOFI has a more targeted and specific remit of opposing the loss to development of the greenfield site within the Iffley Conservation Area known as Iffley Horse Fields (proposed allocation SPS13 'Land at Meadow Lane' in LP2040). Both organisations believe that carrying forward this demonstrably flawed allocation from LP2036 represents a failure on the part of the City Council to prepare the replacement Local Plan positively and in a sound, evidence-based manner. Accordingly, for the LP2040 to be rendered sound, this allocation should be deleted. A joint hearing statement has been prepared in the interests of assisting the examination and avoiding replication. FOIV and FOFI also intend to participate in the Part 1 hearings through a single representative.
- 1.3 FOIV and FOFI recognise that the specific merits and demerits of proposed site allocation SPS13 are not matters the Inspectors wish to receive specific submissions on in Part 1 of the Examination. They intend to make further written and oral submissions to Part 2 to this end. However, both are of the view that the flaws with that proposed allocation are symptomatic of overarching problems which do fall to be considered in Part 1 of the Examination, hence the decision to be involved at this stage.
- 1.4 While FOIV and FOFI have other concerns about the Local Plan, they do not advance a proposition that it is *fatally* flawed. Both believe that the flaws with the draft Local Plan can be remedied in order to make it sufficiently sound for adoption. Such remedies obviously include the deletion of the unsupportable proposed site allocation SPS13 (and cooperation between City and County to deliver its affordable housing component at the near-adjacent SPS14) but they are not limited to that. There are matters at a more strategic level that FOIV and FOFI believe also require attention to improve the Plan and it is these that this Part 1 Hearing Statement is focused on.

1.5 The inspectors are invited to read FOIV and FOI's representations at the Regulation 19 stage of the Local Plan (ref: 167 and 163 respectively in the Reg 19 Respondent index), such that they can appreciate that matters dealt with in this statement have been raised before, and indeed repeatedly. The inspectors are also invited to consider whether the City Council's comments on these and other submissions on SPS13, as set out in their March 2024 consultation statement, are indicative of an open- or closed-minded response to the emergence of major problems with the allocation of that site.

## **2 Scope and structure of statement**

2.1 This statement responds to questions 7, 8, 9 and 17 under Matter 1, questions 7, 10 and 13 under Matter 2, and question 6 under Matter 3 as a focus for responding under that matter (housing need and how it is calculated) generally. Each is dealt with in turn below.

## 5 **Matter 2 – Duty to Cooperate**

5.1 Under Matter 2, **Questions 7 and 10** of the inspectors' Matters, Issues and Questions ask:

*“7. How has the Council engaged with the other authorities in relation to the capacity of Oxford City to accommodate housing?”*

*10. What is the position of the other authorities in terms of the duty to co-operate in relation to this issue?”*

5.2 FOIV and FOFI recognise that these questions are primarily aimed at exploring the rigour in which the Council has discharged its duty to cooperate with neighbouring authorities. However, we would contend that the Council's failure to cooperate with the County Council on the appropriate delivery of housing quantum and affordability ratio at its sites within the ambit of LP2040 – such as SPS14 Former Iffley Mead Playing Fields - despite being encouraged to do so by FOIV and FOFI, is relevant to the inspectors' consideration of these questions. We have not heard from the County Council on this point either.

5.3 Also under Matter 2, **Question 13** of the inspectors' Matters, Issues and Questions asks:

*“10. In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?”*

5.4 FOIV and FOFI believe that the Council's conduct in putting forward site allocation SPS13 is instructive in considering this question. The LP2036 allocation of this site has been shown beyond reasonable doubt to have been based on insufficient rigour and resultant scant evidence in the previous Plan's call for sites and site assessment processes, which led directly to failure to recognise (amongst other things) its high biodiversity value and importance to the integrity of the Iffley Conservation Area. This error was then compounded by a flawed consultation process that saw the site identified as being in the wrong ward, and consequently only residents in the wrong ward being properly notified of the intention to allocate. After adoption of LP2036, the Council then purchased the site, notwithstanding its previous position of opposition to its development. The evidential and procedural shortfalls in the allocation process have since been exposed by information that has come to light in the course of the Council submitting and consulting upon a planning application to deliver development there. That application was submitted in December 2022 and remains undetermined in large part because these issues, which create significant and

major policy conflicts, and have caused significant objection from a wide range of both statutory and non-statutory consultees, have now been duly exposed.

- 5.5 Instead of addressing these clear sources of evidence that the allocation should be reconsidered, the City Council has merely carried it uncritically forward to LP2040 based on continued reliance on assumed positive factors that have been demonstrably disproven. Thus factual inaccuracies such as documentary material that claims the site has a hotel on it and/or that it is previously developed, has been allowed to continue to infect the process. We intend to expand on these issues in Part 2, but for the purposes of the inspectors' considerations at part 1, we make passing reference to them as symptomatic of a failure of due process, and (we contend) of a wrong-headed assumption on the part of the City Council that once made, a poor forward-planning decision should be doubled down upon and cannot be undone.

## 6 Matter 3 – Housing need and the housing requirement

6.1 We make general comments on this matter below, but perhaps most specifically in response to Matter 3, **Question 6** which asks:

*“6. How has the capacity to accommodate housing within Oxford City been assessed? Has the process been sufficiently thorough and robust? Could the capacity estimate be increased by altering assumptions or policy approaches? If so, what effect would this have?”*

6.2 FOIV and FOFI are aware that there have been significant submissions from other parties on the matter of housing demand/need and how it has been calculated. We echo others’ comments that the City’s housing crisis is in large part exacerbated by Council decisions that prioritise employment growth over housing: with some 350,000m<sup>2</sup> of new office space set out in the HENA and hundreds of acres of land proposed to be allocated for employment rather than residential. The recent opportunistic conversion of redundant retail and office space for tech jobs post COVID and Brexit, rather than residential, is additional to these figures.

6.3 In consequence, job creation and the exponential expansion of the universities continues to outstrip housing supply, all in a city constrained by (but benefiting from) green and heritage assets and which does not have an employment shortfall. This puts unsustainable pressure on already failing infrastructure (housing, transport, sewerage, health and social services, education, community space, access to nature) and increases the demand for scarce resources (fresh water, energy, local, land for local food production and biodiversity). It worsens the already illegal levels of air and river pollution, puts the city at increased risk of flooding, urban heating and food shortages, has a huge carbon footprint and denudes Oxford’s (and Oxfordshire’s) already depleted biodiversity. A change of policy approach that seeks to ensure the housing crisis is ameliorated by release of inner city sites to residential as a priority over expansion of commercial employment or academic uses, would help to rebalance demands and reduce the unsustainable pressure on edge of town or out of town sites, including those vital to the city’s green and blue infrastructure, its climate resilience and the health and wellbeing of its residents. There appears to be a disconnect in the Council’s thinking that fails to recognise that what makes Oxford attractive to outside investment is as much its unique heritage attributes and the permeation through the city of its green and blue infrastructure, as it is the pool of talent that resides here as a seat of learning and the city’s advantageous geographic position.

## **7 Conclusions**

- 7.1 Whilst FOIV and FOFI will reserve the main thrust of their submissions for Part 2 of the Examination, in anticipation of the merits or demerits of individual site allocations being examined at that stage, they hope that the inspectors will understand such concerns stem from systemic flaws in the process that are relevant to Part 1. We intend to have a representative at the hearings on June 11-13 and that individual will be available to further articulate and/or elaborate on the points made in this statement, as required. Overall, FOIV's and FOFI's joint position is that the LP2040 requires modification, including the deletion of allocation SPS13, in order for it to be rendered sound, positively prepared and for it to be considered a product of due cooperation with stakeholders, including (not least) the populace of this great city.