

**From:** Paul Castell [REDACTED]  
**Sent on:** Friday, January 5, 2024 2:57:54 PM  
**To:** Planning Policy <planningpolicy@oxford.gov.uk>  
**Subject:** Objection to Oxford Local Plan 2040, Reg 19

Dear Sir/Madam,

I am dismayed to see that the Iffley Conservation Area Land at Meadow Lane (known as the Horse Fields), now referred to as SPS13, remains in the latest draft of the Oxford 2040 Local Plan as a site for building a housing estate.

The inclusion of SPS13 is neither sound nor sustainable. I therefore object to the Local Plan 2040 as it stands.

The Local Plan 2036 included the Horse Fields (then SP42) without proper local consultation (local residents, [REDACTED] where not leafletted). The land was included in the face of previous planning decisions (e.g. 2016 Local Plan), which rejected any building on this site in order to conserve the rural characteristics of the Conservation Area. The only difference to before was that the council themselves (as owners of OxPlace) now owned the land, whereas it was previously owned by a charity. 

Since then OxPlace have submitted a planning application to build a housing estate on this environmentally valuable land. Many formal objections (over 1000) have been made to the planning application. There are also objections from many bodies including the environment agency, BBOWT, Buglife, Windrush Against Sewage Pollution, Cotswold Rivers Trust, CPRE Oxfordshire, Cyclox, Oxford Badger Group, Iffley Fields Residents Association, Oxford Rivers Improvement Campaign, Oxford Civic Society, Oxford Pedestrian Association, Oxford Urban Wildlife group, Friends of the Fields Iffley, as well as a holding objection from Thames Valley Police. It seems that the authors of the 2040 Local Plan have just ignored this significant information and have included SPS13 automatically, without any review of the evidence.

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

This statement seems entirely biased. The planning application claims that the site is suitable for residential uses. It does not establish this as fact. The HELAA just ignores the detailed expert reports submitted in response to the application: Heritage/ Conservation (Orion Heritage), Landscape/Environment (Alison Farmer Associates), Ecology/Biodiversity (BioScan Ltd), Transport/Traffic (Velocity), which together I think clearly demonstrate that the land is in fact not suitable for residential uses. The HELAA also ignores the massive public outcry against the proposed building project as evidenced by a petition of 60,000+ people on [Change.org](https://www.change.org).

The Draft Local Plan 2040 is therefore not *sound*, because not *justified*: It ignores relevant available evidence. It also fails to consider reasonable alternatives: e.g. to put the allocated social housing on nearby Iffley Mead, which has also been allocated for housebuilding, and thereby to conserve the Horse Fields.

I could spend several more hours compiling a summary of all the already publicly available evidence, but there seems no point given that the main problem seems to be that the relevant evidence has so far just been ignored by the authors of the Local Plan 2040. This is the reason the draft Local Plan 2040 should be rejected.

Yours sincerely,

Dr Paul Castell

[REDACTED]

Oxford

5 Jan 2024

Please obscure all personal details except my name and a non-specific address  
I wish to be notified when the Inspector's report is published