

*Objection to OLP 2040 Reg 19 Consultation
Sent via email to planningpolicy@oxford.gov.uk

Sirs:

I gave careful scrutiny to a large chunk of the Oxford Local Plan 2040 and found it both instructive and highly flawed. My comments here are to do with The Land at Meadow Lane aka SPS13. I will use your full title with its letters and numbers to make it easier for you, but this 'scrap of land' (as referred to somewhere in local media) deserves more than letters and numbers to convey what it means to all who use it, see it, and have treasured it for centuries. Its real name is The Horse Fields. Its allocation for 'development' is neither sound nor sustainable and should be permanently removed from any future local or national plans.

1. The HELAA has identified that SPS13 has key policy and environmental constraints:

Conservation Area: Land at Meadow Lane was previously rejected from the 2016 Local Plan as vital to the rural character of the Iffley Conservation Area (ICA) and nothing has changed since then.

Flooding: Your assessment shows SPS13 to lie in Flood Zone 3 (7%) and Flood Zone 2 (13%). There have been multiple floods all along the lower branch on Meadow Lane and in the Horse Fields themselves. The Environment Agency opposes this development due to flaws in the FRA and their opposition on this issue alone should remove LML from allocation.

The location of SPS13 in the rural Iffley Conservation Area and the fact that 7% is in Flood Zone 3 are identical constraints to those of the adjacent meadow 'Land at Church Way' (ref 388). HELAA has deemed the latter unsuitable for development, so there is a lack of consistency here.

We talk so lightly about 'flooding'. The oceans are rising, rivers are overflowing, whole towns are being swept away all over the globe. Violent climate change is not *on its way*, IT'S *HERE*. A meadow is more capable of dealing with the flooding mentioned above than 29 units of housing with very little open ground or greenery left.

2. The HELAA omits further key policy and environmental constraints which make the Horse Fields unsuitable for development and make policy SPS13 unsound – not objectively assessed, not sustainable.

Green infrastructure: SPS13 is CORE green infrastructure as it is a multifunctional historic meadow, so full of nature that it qualifies as an Oxford City Wildlife Site. It is located on three of the Oxford city wildlife corridors and for these reasons should be protected under Policy G1A.

Dangerous access: Access to SPS13 is unsuitable as this would be via narrow lanes designated as Principal Route for Active Travel, lanes already assigned for resident parking. This also makes it completely unsuitable for construction access. Surprisingly, no construction plan is included in this planning submission.

Soundness

A strange term. Very little in the plan seems sound to me. For reasons above, and many more, the proposal to (1) exchange biodiversity for bricks, mortar and concrete (2) destroy peace and quiet and safety for residents and quiet route travellers by adding 160 more residents and dozens more private, construction and delivery vehicles to an ancient, cul-de-sac Oxford heritage village and (3) add further problems to an already struggling sewage system. Onward to reasons and 4,5,6 and more ... the list goes on and on. There is no 'soundness' in this plan, especially as there are reasonable alternatives in Oxford on brownfield sites which the local plan has already mentioned changing from economic to housing designation.

Finally:

This plan is at odds with National Policy on major issues: harms to local ecology, biodiversity commitment for 30% of land set aside for nature by 2030, increase of carbon footprint and, as before, the list goes on and on. I repeat: SPS13 should be removed from allocation.

It would seem that Oxford is determined to downgrade its heritage sites all around its iconic green edges. OCC economic policy is to create jobs, jobs, jobs and not enough housing for those coming in to take up the employment. There are many who are assessing this and other Oxford planning proposals as critically as I am doing here. Elections are coming up. Enough said.

Dr. Peggy Seeger

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04 January 2024