Representation by FOIV with regards to the Fields and Iffley Conservation Area in 1994

RAC/cb

The Programme Officer
Oxford Local Plan Review 1991–2001
Oxford City Council
St Aldate's Chambers
St Aldate's
Oxford
OX1 1DS

30 March 1994

For the attention of Lyn Lawrence

Dear Sir

TOWN AND COUNTRY PLANNING ACT 1990
OXFORD LOCAL PLAN REVIEW 1991–2001
FORMAL REPRESENTATIONS ON BEHALF OF THE FRIENDS OF IFFLEY

Smith–Woolley are instructed by The Friends of Iffley to submit representations on the draft of the *Oxford Local Plan Review*. The objector's reference is D060.

These representations relate to the proposals put forward by Donnington Hospital Trust in regard to a site of approximately 3.5 acres (1.4 hectares) between Church Way and Meadow Lane, Iffley. Oxford City Council's Proof of Evidence P13 (Objections D267/003 and D267/004) refers.

The Friends of Iffley comprise approximately 320 subscribing members, all of whom live in the village, sharing a common purpose of promoting conservation and community interests in the neighbourhood. The Friends of Iffley are particularly concerned to ensure that the adopted local plan for the City of Oxford strikes the right balance between (1) housing need (2) conservation area controls and (3) environmental protection. It is acknowledged that there is a degree of overlap between these three issues but the Friends of Iffley cannot accept that relatively large scale residential development, as provided for by Policy HO3, is compatible with local plan designations that aim to preserve or enhance the special local qualities of Oxford's natural heritage, of which Iffley forms an integral part.

We have carefully considered the policies and explanatory text of the deposit draft plan. The Friends of Iffley generally support the proposals of Oxford City Council, but there are a number of concerns that remain at this stage in the local plan preparation process. These concerns are summarised as follows:

1. The environment and housing proposals of Oxford City Council confuse the fundamental importance of the subject land in terms of both the contextual (Green Belt setting) and integral (eg. conservation area) character of Iffley.

2. Definition of the detailed boundaries of the various environmental and housing designations is undertaken at an inappropriately fine scale for local plan purposes, causing discordant aspects of these policies to overlap. The favourable consideration of proposals for up to 20 dwellings, as set out in Policy HO3, is clearly incompatible with the Iffley Conservation Area and view cone (Policy E26) objectives. The subject land between Church Way and Meadow Lane needs to be safeguarded and a uniform planning regime needs to be applied not only to the entire 3.5 acre site but preferably to the conservation area as a whole.

These representations will now address these concerns by reference to the chapter headings in the deposit draft local plan. The opinions that follow can be considered as a counter–objection to the compromise recommended by Oxford City Council (Change 3020) that leaves Policy HO3 applicable along Church Way from numbers 50 to 68.

1. ENVIRONMENT – CHAPTER 2

Chapter 2 deals with conservation area controls and environmental protection. The subject land is covered by three policies:

- Special Open Space (EN5)
- Conservation Area (EN29–EN36)
- High Buildings Area and View Cones (EN25–EN27)

In addition, the western edge of Iffley, and therefore the context and setting of the village, is affected by three further designations:

- Green Belt (EN1 and EN2)
- Site of Special Scientific Interest (EN15)
- Other Nature Conservation Area (EN16 and EN17)

The strong emphasis on conservation and the environment is further enhanced by good public access, for example the proposed pedestrian cycle route (Policy TR24) and Definitive Footpath No. 3 that runs along the western bank of the River Isis from Iffley Lock past the Isis Tavern and beyond.

We would surmise, therefore, that the draft local plan provides a strong indication that the existing character of Iffley should be safeguarded. Moreover, it is now understood that Policy EN5 contributes more than Policy EN3 to the protection of the village from development because Policy EN5 refers specifically to the Special Open Space value of the land between Church Way and Meadow Lane. Paragraph 2.4 of Oxford City Council's Proof of Evidence P13 confirms this opinion.

Policy EN5 goes on to state that development will be resisted unless the important relationship between the edge of the built–up area and its landscaped setting is preserved or enhanced. But there are difficulties in the implementation of this approach because the edge of the built–up area cannot easily be defined. We would recommend two courses of action, first that the boundaries of the designations affecting the subject land could be determined having regard for site specific features or, secondly, that the land could be defined in terms of the compatibility of policies in the draft local plan.

Dealing with the first approach. The land between 60 and 68 Church Way does not readily lend itself to development. It is less than 25m wide and overlooked from windows in the elevations of properties adjoining this land. There are also overlooking problems in regard to the properties at a higher level, to the east of Church Way. Aside from the amenity value of the open space, the stone wall fronting Church Way forms an important part of the conservation area. On this basis, therefore, we would recommend that the boundary for the Policy EN5 designation remains as shown on the draft proposals map but the Policy HO3 designation should be removed.

In regard to policy matters we consider that the Conservation Area and Special Open Space designations are entirely compatible. In addition, the special quality of the subject land is emphasised by the view cone (Policy EN26) that stretches from Iffley towards the City Centre. But, it is difficult to reconcile the conservation and environment policy objectives with those of Policy HO3.

Ultimately we believe that it is the way in which the subject land relates to the character of Iffley that is the overriding consideration. In this respect, the publication that accompanied the designation of the Iffley Conservation Area in October 1969 provides a helpful insight. Whilst conservation attitudes have progressed substantially over the last 25 years the following extracts from this publication are still largely relevant:

> "Church Way, the spine of the area, still retains its rural character: nearly half a mile long, of irregular width, lacking continuous footpaths and lined with good old stone walls, it meanders in pleasant curves from Iffley Turn southwards to the river, ending in a superb climax at the Church of St Mary."

> "There are some 20 acres [now less than 4 acres] of undeveloped land in Iffley – enough to double its population if developed, even at a rather low density. Should this development depend for its vehicular access on Church Way, this ancient village road would carry too much traffic and its character, and with it the character of the whole village, would be ruined forever."

We enclose a photocopy of the 1969 publication, together with a letter from Oxford City Council confirming the designation of the conservation area.

It is for these reasons that The Friends of Iffley recommend that the Policy HO3 designation should be removed in its entirety from the conservation area, or at least from the land to the west of Church Way (the Policy TR24 pedestrian cycle route).

2. PEOPLE & HOMES – CHAPTER 3

Policy HO3 serves a rather ambivalent purpose, perhaps reflected in the national guidance contained in paragraphs 15 and 20 of PPG3: *Housing*.

> "In order to meet the requirement for new housing and at the same time maintain conservation policies, it is important that full and effective use is made of land within existing urban areas."

> "But sensitive planning control is necessary to ensure that the cummulative effects of redevelopment do not damage the character and amenity of established residential areas. Where there is a strong pressure for development which could give rise to town cramming if not carefully controlled, planning authorities should ensure that local plans include clear policies in relation to which applications will be considered."

The problem is that Policy HO3 aims to combine the strategic objective of meeting the requirement for new housing within the existing built–up area whilst, at the same time, the policy fails to distinguish adequately the importance of conservation and environment policy objectives from housing requirements. The wording of Policy HO3 goes far beyond the claim made in paragraph 7.2 of Oxford City Council's Proof of Evidence that the purpose of Policy HO3 is to define existing residential areas rather than to propose extensions to them. There is no reason why proposals for housing involving up to 20 dwellings should be considered favourably in conservation areas.

We would add that "compliance with other policies" as stated in Policy HO3 does not address, for example, the statutory duty in Section 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990 that "*special* attention shall be paid to the desirability of preserving or *enhancing* the character or appearance of that area".

The above arguments support the view that Policy HO3 should not apply to conservation areas. Alternatively, the detailed wording of the policy could be amended.

CONCLUSION

The Friends of Iffley support the view that the combination of Policies EN5 and HO3 shown on the deposit proposals map is indeed a drafting error. There appears to be no logic in this synthesis. We would recommend that the conservation and environment policies are separated from policies that encourage housing development. The purpose of Policy HO3 goes beyond the definition of existing residential areas.

The 3.5 acre site between Church Way and Meadow Lane is an important and special part of Iffley, it contributes significantly to the integrity of the conservation area and adds value to the enjoyment and quality of the Oxford Green Belt and related designations.

We would commend Oxford City Council on the policy, content and presentation of the deposit draft *Oxford Local Plan Review*. These representations are submitted in a constructive manner. The Friends of Iffley hope that the Officers of the Council will find the representations both informative and helpful in their continuing work and consultation through the local plan inquiry.

Further information on any of the representations submitted in this letter may be obtained from Richard Cutler of Smith-Woolley Chartered Surveyors (tel: 0225 448383).

Yours faithfully

Smith–Woolley
R A Cutler BSc (Hons) ARICS

OFFICIAL



Gail.

The Friends of Iffley Village

18 Mill Lane,
Iffley OX4 4ES.

To - Members of the
FOIV Planning Com.
c.c. Vivian Salmon.

5th April, 1994.

Donnington Trust Land - Church Way.

Oxford City Council evidence to the Local Plan Review made an unexpected concession to Donnington which would permit development of the land to the right of the fabric shop. Corinne and Jacqueline attended the hearing at my request and Vivian was present, armed with documents not then generally available.

The Inspector agreed that the FOIV could enter a counter objection to the Council's concession and on advice from some members of our Planning Committee I joined Simon, Penelope and Corinne in briefing Richard Cutler of Smith-Woolley to prepare formal representations. A fee of £350 max. was agreed by me.

I enclose a copy of the Council's summary of evidence and of the FOIV counter objection.

I believe the Inspector, who has visited the site, may reopen the issue at her Review, allowing the issue to be re-examined orally. I spent an hour with Ms. Stevenson who presented the Council case and she attempted to get her superiors to withdraw their concession. They would not agree to do so. Bob has been consulted throughout, of course.

David.