



# Land off Meadow Lane, Iffley, Oxford

Application Ref: 22/03078/FUL

Response to Landscape and Visual Appraisal

Final Report February 2023



## Proposed residential development on Land off Church Meadow, Iffley, Oxford.

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### 1.0 Introduction

#### Appointment

1.1. My name is Alison Farmer, BA, MLD, CMLI. I am a consultant landscape architect and environmental planner experienced in landscape and visual impact assessment (LVA) townscape assessment (TVIA) and the preparation of landscape appraisals which support and inform the preparation of neighbourhood plans. I am instructed by Friends of Iffley Village to prepare a representation on landscape and visual matters in relation to the above application.

#### Scope of Review

- 1.2 This review refers to documents associated with the planning application 22/03078 and other relevant background documents. It has included desk-based review and has been informed by a site visit in Oct 2021.
- 1.3 Guidelines for Landscape and Visual Impact Assessment (GLVIA 3<sup>rd</sup> edition) state that Landscape and Visual Impact Assessment (LVIA) in urban contexts requires a good understanding of townscape and in para 5.5 it sets out a range of different factors that require particular understanding. It also states in para 5.10 that landscape professionals should make good use of existing historic landscape information and collaborate with historic environment specialists to allow the landscape baseline information to reflect a full understanding.
- 1.4 This review therefore draws from both the Landscape and Visual Assessment (LVA) and the Built Heritage Assessment (BHA) submitted with the planning application.
- 1.5 This report includes:
- A review of the **planning history** of the site and previous judgements regarding its capacity to accommodate development and contribute to GI
  - A summary of the **current baseline**, including an assessment of the value of the site
  - A description of the proposed development
  - A **review of the Landscape and Visual Assessment (LVA) and Built Heritage Assessment (BHA)**
  - Summary of the **characterising and visual effects** of the proposed development
  - Review of the **justification for development** in the LVA and BHA
  - **Conclusions**
- 1.6 This review considers the effects of the proposed development on the settlement of Iffley and its immediate context. It has not included a review of the assessment of wider landscape effects including those on the view cone from Rose Hill. This should not be taken to signify agreement of these assessments.
- 1.7 This report also does not comment on the level of harm to heritage assets which is covered in a separate Heritage Report prepared by Orion (Feb 2023).
- 1.8 Where text is underlined in this report it is to provide emphasis.

## 2.0 Planning History of the Site

### Existing National Policy

- 2.1 The National Planning Policy Framework (2021) sets out relevant policy in relation to landscape including Para 174 which states:

*‘Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*

*b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.’*

- 2.2 Landscape value is defined in GLVIA and the LI Guidance on Assessing Landscape Value Outside National Designations (2021) as:

*‘The relative value or importance attached to different landscape by society on account of their landscape qualities’.*

- 2.3 The factors which are used to determine landscape value are set out in table 1 of the guidance and are used in section 5 of this report.

### Local Plan Policy

- 2.4 Oxford Local Plan 2020 is the relevant Local Plan and contains policies relevant to landscape and heritage. These include the protection of green and blue infrastructure networks (Policy G1). Paragraph 5.2 of the supporting text highlights that The Oxford Green Infrastructure Study (2017) identifies Oxford’s green spaces and assess their social, environmental and economic functions and this has been used to identify a network of multi-functional green spaces. Sites mapped within the local plan are derived from the GI Study.
- 2.5 Policy DH3 relates to Designated Heritage Assets including Conservation Areas. Policy wording is set out in full within the Heritage Statement prepared by Orion (Feb 2023) and is not repeated here.
- 2.6 The site itself is allocated for development in the Local Plan (Policy SP42) for a minimum of 29 dwellings.
- 2.7 The supporting text (para 9.201) highlights that the development *‘has potential for some sensitive housing infill’*. The term ‘potential’ suggests that the site may accommodate development but that its ability to do so is still unproven. This is reinforced further by text which highlights the sensitivity of the site stating that:

*‘Any development proposals would be expected to:*

- *Conserve and enhance the unique characteristics of the Iffley Conservation Area*
- *Retain the semi-rural frontage on Church Way including retention of stone wall boundaries and trees.*

- *Be low-density and two-storey with front and rear gardens.*
- *Take account of views through the riverside edge landscape of the Cherwell meadows to the west and back to Iffley from the west.*

2.8 Understanding the historical decision making surrounding the site's allocation is important for two reasons. Firstly, it highlights that previous assessments of the site conclude it is unable to accommodate development without giving rise to adverse effects on the Conservation Area and or plays an important function in terms of rural aesthetic, GI network and character. Secondly, it highlights a lack of transparency in the assessments which led to a change in the judgement and the subsequent decision to allocate the site and exclude it from the GI network of Oxford. These issues will be explored further below.

### Planning History

2.9 Table 1 below sets out the planning history relevant to the site and highlights the following:

- A previous planning permission for 4 dwellings on the site and accessed off Meadow Lane, predates the designation of the conservation area. A further application in 1994 was refused based on the important role the site played in expressing the rural character of Iffley.
- The 2014 and 2016 HELAA assessed the site (no 389) as having no capacity for development due to the impact it would have on the conservation area.
- The 2017 HELAA (undertaken by the same consultants as the 2016 study) concluded that the site had capacity to accommodate low density development although it is unclear why it reached a different judgment to the 2016 assessment since there had been no material changes to the site's character and context. It is notable that site 388 (Memorial Field) was not assessed and that site 399 remained unsuitable for development due to impacts on the conservation area.
- The 2017 GI Assessment assessed the site (no 389) and land at The Glebe Field (no 399). Neither of these sites was identified as forming part of the Oxford GI network. Nevertheless, both sites were noted as contributing to the rural aesthetic of the area, the site particularly so. In the 2019 GI Study Appendix 3 the judgement on the site had changed and both were noted as contributing to the GI network of Oxford.
- The Oxford Adopted Local Plan 2020 allocated site 389 for development and site 399 as part of blue and green GI. The background to the allocation is discussed further in a separate Planning Statement prepared by MWA (Feb 2023).
- The GI Assessment update in 2022 Map 13 shows the site falls into Habitat Enhancement Zone 1, illustrating the importance of the site as part of strengthening the Oxford GI network.
- The LCA update 2022 expands on the 2002 LCA and highlights the threats to the character of Iffley Village 3F.

Table 1: History of Planning Assessments and Judgements

Document and Date	Comment
Planning permission for 4 dwellings (69/21554/A_H)	This permission predates the designation of the Iffley Conservation Area.
Iffley Conservation Area designated 1969 and boundary refined in 1985	
Oxford Local Plan 1991-2001	Site allocated as Important Greenspace (Policy EN5).
Planning application 1994	Refused on the basis that the site played an important role in expressing the rural character of Iffley.
LCA Oxford and its Landscape Detting LUC 2002	Identified Iffley Village character area 3F. Considered to be of very high quality. Its condition (landscape quality) = high, historic integrity = high and open space (Iffley Meadows on western edge) = Moderate.  Overall, it was considered to be highly sensitive to change.
Iffley Conservation Area Appraisal 2009	This provides a detailed description of the character and qualities of the Conservation Area, dividing the CA into different character areas and detailing the role of open space, routes and views in contributing to the rural qualities of the village – refer to paras 3.12-3.27 below for more information.
Sites and Housing Development Plan Document Preferred Options Consultation Document May 2011 Appendix 4: site rejected before or at the Pre-Options consultation	Meadow Lane site (No 100) <i><u>'Development on the site would have a detrimental effect on the conservation area, as well as difficulties in creating a suitable access. The draft Iffley Conservation Area Appraisal describes this site as 'one of the important remaining open spaces within the village, a field once the village cricket and football field now grazed by animals, again reinforcing the rural nature of the settlement'. The Landscape Character Appraisal for Oxford (2002) notes the importance of the low-density development playing an important part in the character of the area. Development of the site would be harmful [to] views and to the rural character and linear nature of the village. Potential access is off Meadow Lane and Church Way. Access would be straight onto a roundabout. Meadow Lane is a private road and there could also be difficulties providing an adequate sight line.'</u></i>  Memorial Field was also assessed (No 99) <i><u>'Development on the site would have a detrimental effect on the conservation area, as well as difficulties in creating a suitable access. The Iffley Conservation Area Assessment notes that the site is important because of the long views it allows out of the conservation area and across the fields to the Thames and beyond. The Landscape Character Appraisal of Oxford (2002) notes the importance of the low-density development playing an important part in the character of the area. Development of this site would also result in the urbanisation of the view from the river to Iffley and would be counter to the linear nature of the village.'</u></i>

	<i>Potential access is off Church Way, although the proximity of the roundabout opposite the Tree Hotel and the location on an inside bend mean it would be difficult to create a safe access.'</i>
Housing Land Availability Assessment 2014 (URS)	<p>Site (no 389) Land at Meadow Lane. <i>'Unlikely to be possible to develop without a significantly negative effect on the Conservation Area. This constraint remains.'</i></p> <p>Memorial Field adjacent (no 388) also assessed as <i>'unlikely to be possible to development without a significantly negative effect on the Conservation Area. This constraint remains.'</i></p> <p>At this stage there was no intention by the landowner to develop either site.</p>
Oxford Local Plan 2001 - 2016	Site was not allocated for development.
HELAA 2016 AECOM	<p>Map shows the site (no 389) and Memorial Field (no 388) as not currently accepted for additional housing or economic uses.</p> <p>Appendix A concluded:</p> <p>Site 389 (area of 1.57ha) - identified as a 'greenfield site'</p> <p><i>'The site was considered through the Sites and Housing Plan but was rejected as development is <u>unlikely to be possible without a significantly negative effect on the conservation area</u>. This constraint remains..... Development would have a significant negative effect on Conservation Area with no evidence of availability over the plan period.'</i></p> <p>Site 388 (area of 0.577 ha) It was identified as a 'greenfield site'</p> <p><i>'The site was considered through the Sites and Housing Plan but was rejected as development is unlikely to be possible without a significantly negative effect on the conservation area, it is in a particularly sensitive part of the CA. This constraint remains..... Development would have a significant negative effect on Conservation Area with no evidence of availability over the plan period.'</i></p>
Green Infrastructure Study (Stage 1 - June 2017_ (Final Report – Dec 2017)	<p>A green space audit was undertaken as part of the GI study. Sites identified in the HELAA as 'greenfield sites' were used as a basis for the assessment (page 6) where they meet the criteria i.e. are over 0.1ha in size.</p> <p>In the Stage 1 Report (June 2017) Site 389 – land at Meadow Lane/Church Way – was assessed. The report concluded: <i>'This private animal grazing space is connected via an adjacent PROW. The site is unimportant to flood management as, although it contains some 3b FZ area, it is largely in FZ 1. The site also has no biodiversity designations or functions. It is in an area of moderate landscape value; however, <u>this site is of particular significance in retaining the rural aesthetic of the area.</u>'</i></p> <p>This assessment concluded that the site was not part of the GI network. Similarly, site 399 (The Glebe Field) was also not considered part of the GI network. However, by the time the Local Plan was made (2020) this latter site (399) was identified as GI.</p>

HELAA Nov 2017 AECOM	<p>The site (no 389) was identified as suitable for low density development which would not have a negative impact upon CA area. Memorial Field (no 388) was not assessed. The Glebe Field (no 399) was assessed as <i>'development unlikely to be possible without a significant negative effect on the CA and setting of listed building.'</i></p> <p>There is no transparency or evidential basis to justify the judgement relating to the proposed development site given that nothing had changed from previous assessment work. The site remained in the CA and continued to perform its function in terms of GI and its contribution to the rural character of the Conservation Area. The methodology between the HELAA of 2016 and 2017 is identical - the only material difference is the availability of the site.</p>
Local Plan – Proposed Submission Draft Dec 2018	Site allocated (SP43). Concerns were raised by NE that the site may impact on the hydrology of Iffley Meadows SSSI.
HELAA March 2019	Reiterates findings of 2017 HELAA
Oxford GI Study March 2019	Update of earlier 2017 GI Study. The main report pages 9/10 states that sites are considered as part of GI if they show, amongst other things, <i>'significant visual interest or townscape importance'</i> . Appendix 3 set out the findings of the site assessments. Site 389 was considered part of GI and unprotected. Site 399 was also identified as part of GI and unprotected.
Local Plan Adopted June 2020	<p>The site was allocated for housing development (min No 29 dwellings) stating it had 'potential' but also highlighting sensitivity of the Iffley CA. (Policy SP43)</p> <p>The supporting text highlighted that the development would be expected to:</p> <ul style="list-style-type: none"> <li>• <u>conserve and enhance the unique characteristics of the Iffley Conservation Area</u></li> <li>• <u>retain the semi-rural frontage on Church Way</u> including retention of stone wall boundaries and trees.</li> <li>• be low-density and two-storey with front and rear gardens.</li> <li>• <u>Take account of views through the riverside edge landscape of the Cherwell meadows</u> to the west and back to Iffley from the west.</li> </ul>
Green Infrastructure Study Update 2022	<p>This document at para 2.2.4 highlights the importance of grasslands in resilience to climate change. It also identified the strategic priorities of:</p> <ul style="list-style-type: none"> <li>• Protect what we have</li> <li>• Enhance what we have</li> <li>• Provide new GI</li> </ul> <p>It identifies the site, Memorial Field and private gardens on the west of Iffley as part of Habitat Network Enhancement Zone 1 (Map 13). This is defined in the National Habitat Network Maps prepared by Natural England (May 2020) as <i>'Land connecting existing patches of primary and associated habitats which is likely to be suitable for creation of the primary habitat. Factors affecting suitability include: proximity to primary habitat, land use (urban/rural), soil type, slope and proximity to coast. Action in this</i></p>

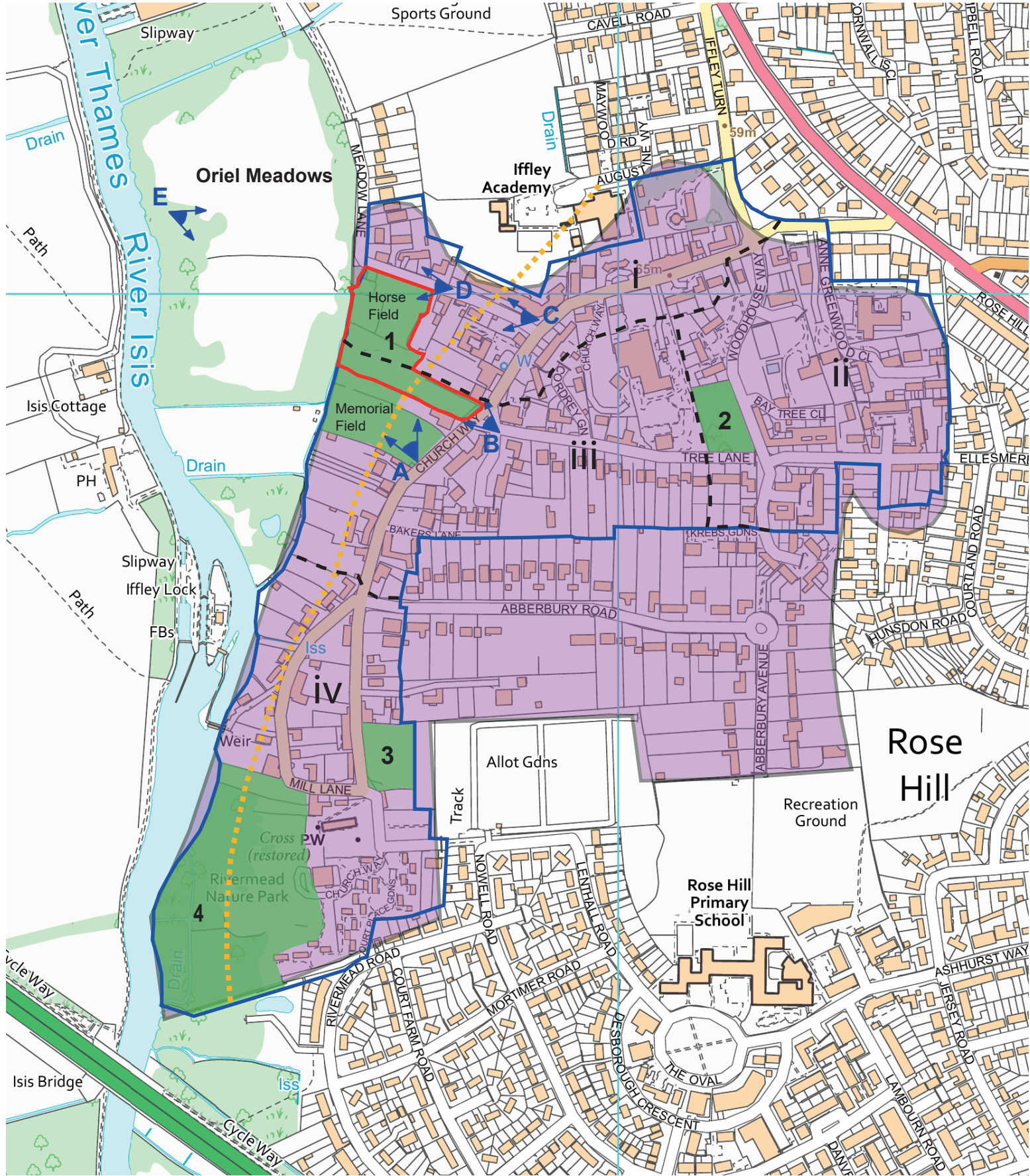
	<p><u>zone to expand and join up existing habitat patches and improve the connections between them can be targeted here</u>.</p> <p>The site is not identified as Habitat Network Enhancement Zone 2 where action is to <i>'improve the biodiversity through land management changes and /or green infrastructure provision.'</i></p>
LCA Update CBA 2022	<p>The site continues to form part of a wider townscape area 3F Iffley Village. Indicators of landscape value include high landscape quality, and high historic integrity due to survival of historic features but also <u>village form</u>. Biodiversity and open space are of moderate value and the ability of the area to be re-created is low. This makes the area highly sensitive to change.</p> <p>The LCA also highlights threats to local character which were not included in the previous LCA – these are set out in para 3.11 below)</p>



### 3.0 The Site and Context - Understanding the Baseline

#### Overview

- 3.1 The site lies within the Iffley Conservation Area and with the Iffley townscape character area 3F as defined in the Oxfordshire Landscape Character Assessment (2002 and 2022).
- 3.2 The site comprises two fields - a linear field between 60 and 66 Church Way and the former cricket pitch/recreation area known locally as Horse Fields. The site is greenfield land, used for grazing animals and none has been ploughed or has previously been built on. The site therefore comprises permanent pasture forming a mosaic of good quality semi-improved neutral grassland (para 4.8 of Ecological Impact Assessment) with scrub, tall ruderal vegetation and hedgerows. It is flanked on its western side by a brook.
- 3.3 Immediately to the south of the site is a further open field known as Memorial Field and to the west is the open meadows of Oriel Meadow and Iffley Meadows SSSI beyond. The site therefore forms part of a group of fields that connect to Memorial Field to the south and to the wider floodplain to the north and west.
- 3.4 The character of Meadow Lane to the north of the site is semi-rural, becoming increasingly rural to the west. East of existing properties 400 and 431 the lane is c. 5.5m wide with a footway along its northern side. It is flanked by stone and brick property boundary walls. Beyond no 400 the lane narrows and is flanked by vegetation. Property number 425 is an undesignated heritage asset thought to be a former farmhouse dating to the 17<sup>th</sup> century (refer to Heritage Statement, Orion, Feb 2023). This property is set back from the lane and associated with property 429 and both sit behind existing vegetation. Beyond this is property number 421 which fronts onto the lane before it bends northwards.
- 3.5 The southern side of the lane is undeveloped, flanked by a grown-out field hedge (G9 in the Arboricultural Assessment) which forms the northern boundary of the site. This hedgerow varies in height between 2.5m and 6m and Drawing 1 in the Arboricultural Assessment illustrates the width of this vegetation. Viewpoint 2 in the LVA demonstrates the perceived continuous extent of vegetation associated with this boundary both in the summer and winter (despite the depiction of a broken vegetated boundary on Drawing 1 of the Arboricultural Assessment). As noted in the Built Heritage Assessment (para 3.4) there are filtered views into the site from Meadow Lane and the openness of the site beyond is easily perceived.
- 3.6 The presence of development on one side of the lane only, the continuous length of vegetation along the southern side of the road, intermittent views into the openness of the site and the setting back and arrangement of properties on the north side, contribute to strong perceptions of a rural route within the Conservation Area. These qualities are reiterated in the BHA at para 4.17 which refers to the narrow route, abundance of vegetation, relaxed urban grain, and degree of permeability. It goes on to state that *'the rural quality of the road can also be attributed to the open fields (the site)....glimpsed views through the hedgerows and a perception of the open space beyond...'*



- Key**
- Conservation Area Boundary
  - Conservation Area Character Areas
  - Key Views Described in CAA
  - Iffley Character Area 3F
  - Green Spaces Described in CAA
    1. Pasture Fields
    2. Woodland along Woodhouse Way
    3. The Glebe Field
    4. Rivermead Nature Park
  - 60m Contour

Land off Meadow Lane, Iffley  
**Figure 1: Village Analysis**

## Existing LCA

- 3.7 The most relevant LCA to the site and proposed development is the Oxford LCA (LUC 2002) and the 2022 update. This includes townscape assessment and classifies the site as forming part of Iffley Village (3F). The extent of this character area is shown on Figure 1 of this report. The LCA states *‘green spaces and mature trees play an important part in the character of the area...’* Overall, the townscape character of Iffley Village is *‘highly sensitive to change as a result of its historic integrity, biodiversity interest and proximity to the Thames floodplain.’* The overall strategy is to *‘conserve the existing rural village character and protect against inappropriate development or loss of key townscape/streetscape features.’*
- 3.8 Furthermore, the LCA highlights at para 2.27 that *‘settlements have been recognised as providing important areas of wildlife habitat outside the areas specifically managed for nature conservation (e.g. designated SSSI’s, SLINC’s and nature reserves). The ecology of these non-designated sites, or urban greenspaces, is often under-recorded and their contribution to the ecology of an area is therefore under-valued. Crucially, these urban greenspaces often provide the main connection for many people to wildlife and nature.’*
- 3.9 At para 2.30 the LCA highlights the important habitat of farmland noting *‘enclosed pastures are common on the floodplains of the Thames and Cherwell valleys, with mixed and arable farming on farmed river terraces and the clay vales surrounding the settled core of the city.’*
- 3.10 In its conclusion the LCA provides a summary of the three themes which reoccur in art and literature in relation to the perceptions of the Oxford landscape and notes that these themes were also highlighted during the LCA consultation workshops. These include:
- the dramatic vistas to Oxford from the surrounding rural heights;
  - the waterways that thread through the city providing a picturesque, pastoral, and peaceful setting for the buildings; and
  - the historic buildings and architectural diversity.
- 3.11 As noted in table 1 above, the LCA update 2022 includes a section on the threats to local character within 3F. These were not included in the previous LCA and are as follows:
- *‘New built development which results in the erosion of quality landscape between the buildings*
  - *New development that does not have regard for the spatial characteristics of the townscape*
  - *New built development on the edges of the village that intrudes into the setting to the village and results in loss of connectivity with the surrounding rural floodplain*
  - *Road improvements that alter the character of the village streets and introduce urban detailing of the streetscape and open spaces including kerbs, road marking, signage, and fencing*
  - *Loss of green space including village greens, grass verges, public open space, remaining small fields and gardens, both in the public and private realm could threaten the rural character’*

## The Conservation Area Appraisal

3.12 The Iffley Village Conservation Area Appraisal (CAA) was published in August 2009. It provides information on the character and special qualities of the village and its extent is illustrated on Figure 1 of this report. It sets out that:

- Iffley retains a strong rural character and an extensive green setting to its west
- There is a network of winding lanes – bordered by stone walls and often without pavements.
- Historic lanes such as Tree Lane and Meadow Lane retain their ancient function as important pedestrian through routes and cycle ways whilst not permitting vehicles.

3.13 The photograph on page 9 of the CAA demonstrates how the village is located on slightly raised land above the flood meadows adjacent to the river. It also demonstrates the open pastoral fields (the site) which fringe the village and form the interface between the built-up areas and open water meadows to the west.

3.14 The assessment goes on to divide the village into four-character areas, these have been interpreted from the CAA and illustrated on Figure 1 of this report. This Figure also highlights the areas of open space referenced within the CAA.

3.15 The site falls predominately into the Northern Section (area i) and sets out the following key features for this area :

- i. Historic and characteristic stone walls
- ii. Old trees and well planted substantial gardens
- iii. Remaining open green spaces
- iv. Long views across the undeveloped fields out of the conservation area
- v. Architectural diversity

3.16 The southern part of the site falls within the Central Section (area iii). The assessment describes the following key features for this area:

- i. Mature planting
- ii. Traditional ragstone walling
- iii. Strong rural characteristics

3.17 Although the CAA does not contain a map illustrating key views it does refer to views of particular importance within the descriptive text. Where they are relevant to this planning application, they have been translated onto a plan at Figure 1 in this report and are described below with reference to the wording within the CAA. Cross reference is also made to the LVA viewpoints and photographs.

3.18 **Viewpoints A** is the view across Memorial Field from Church Way i.e. between properties 68 and 78a. It corresponds with Viewpoint 5 of the LVA. There are a number of references to views from this location in the CAA including:

*‘Of the two remaining fields providing open views from Church Way to the water meadows and the river... The second field is between nos. 68 and 78a Church Way.’*

*'The space between nos. 68 and 78 Church Way is filled by a mid-height stone wall, the sense of space above and beyond adding to the light and airy character of this part of the village.'*

3.19 Specifically in relation to Church Way it states that *'the series of pronounced curves along its course creates a sequence of unfolding views. There are also opportunities for long views across the fields in the gaps between the buildings.'*

3.20 **Viewpoint B** is the view across the site from Church Way between properties 66 and 60. It corresponds with Viewpoint 4 of the LVA. There are again a number of references to views from this location in the CAA including:

*'Of the two remaining fields providing open views from Church Way to the water meadows and the river, that between nos. 60 and 66 is still owned by Donnington Hospital Trust and was the site of the village stocks until 1855 and has been used as the cricket field.'*

*Immediately opposite the junction of Tree Lane with Church Way is the first of two opportunities for long views. The first gap is between nos. 60 and 66 Church Way, important in terms of the long views out of the conservation area, extending across fields beyond the River Thames and onward to Bagley Wood and Boars Hill. These spaces are grazed by animals, reinforcing the rural nature of the village. They are privately owned, but the public enjoyment of the views is an important aspect of the overall character of the conservation area.'*

3.21 A photograph of this view is included in the CAA on page 17.

3.22 **Viewpoints C/D** are along Meadow Lane. The CAA states *'Meadow Lane retains a predominantly rural quality, gently sloping down to the meadows flanking the western boundary of the conservation area.'* It goes on to state *'the south-western side of the lane [the site] is one of the last remaining important open spaces within the village. It is a field that was once the village cricket and football field, now grazed by animals, again reinforcing the rural nature of the settlement.'*

3.23 The photograph on page 12 of the CAA illustrates the view down Meadow Lane across property No 400 with the undeveloped site, meadows, and hills beyond. Viewpoints 2 and 3 of the LVA similarly illustrate the characteristics of Meadow Lane described in the CAA.

3.24 **Viewpoint E** is the view from the wider meadows to the west. This corresponds to Viewpoints 8 and 10 in the LVA. The CAA illustrates the nature of the views back from the wider meadows in the aerial photograph on page 9, stating that *'Despite the increasing suburbanisation, Iffley retains a strong rural character and an extensive green setting to its west.'* This is most legible across the site where the openness of the pasture fields is evident and older properties are seen between vegetation on higher land. Figure 1 of this report also highlights how historically development of the village has focused above the 60m contour, and that Church Way has followed this contour line thus retaining a sense of a linear village. Only relatively recently (1970's) has infill development extended north of the site along Meadow Lane. When viewed from the meadows the encroachment of this housing onto the lower slopes adjacent to the floodplain is apparent – here the perception of the historic village being located on the rising land above the floodplain is undermined, whereas at the site it is retained.

- 3.25 These viewpoints and the associated descriptive writing in the CAA clearly illustrate the importance of the open fields of the site in contributing to and reinforcing the rural character of the Conservation Area and the linear form of the village which are regarded as key characteristics and qualities.
- 3.26 Reference to Figure 1 of this report illustrates that there are not many other open spaces in addition to the fields noted above within the Conservation Area. The CAA refers to The Glebe Field close to the church, the rear gardens extending down from Church Way and the woodland and public green space at the junction between Woodhouse Way and Tree Lane. However, none of these open spaces perform the same function or make the same contribution to the Conservation Area as the pastoral fields comprising the site and Memorial Field. On this basis these fields can be seen to perform a particular function and are rare in the context of Iffley Conservation Area.

### Green Infrastructure

- 3.27 The site was not identified as forming part of Oxford Blue and Green GI in the Oxford Local Plan (2020). However, GI is defined in the Glossary of the Local Plan as:
- 'A strategically planned and managed network of green spaces and other environmental features that perform ecological and sustainability functions within an urban area, along with providing spaces for public amenity.'*
- 3.28 The location of the proposed development site adjacent to wider meadows to the north and west and Memorial Field to the south, and its role in relation to sense of place as set out in the LCA and CAA, indicates that it contributes to social and environmental functions of GI. These functions include health and wellbeing, heritage, sense of place and tranquillity, as well as supporting biodiversity, water management and air quality.
- 3.29 This is further supported in the GI Update 2022 which highlights the importance of grassland as a carbon store and includes Figure 13 which shows Habitat Network Mapping and Nature Recovery Network Recovery Zone. On this map the site is marked as a Network Enhancement Zone 1 and the action associated with this Zone as defined by Natural England is a 'zone to expand and join up existing habitat patches and improve the connections between them'. The proposed development site is not a random area of open space within the urban fabric of Oxford.

## 4.0 The Proposed Development

- 4.1 The proposed development comprises 32 dwellings with the main access off Meadow Lane and a separate access to two dwellings (plots 31 and 32) off Church Way.
- 4.2 The Design and Access Statement (DAS) states that the proposed development would be no more than 2 storeys high (the LVA notes buildings of no more than 2.5 storeys high). Although no specific building heights are provided, the scale of the built form, relative to existing buildings in the vicinity, can be determined through reference to the cross sections contained in the DAS at page 33. Internal Elevation A illustrates the height of the proposed dwellings facing onto Meadow Lane compared to existing built form opposite. Similarly, Meadow Lane Elevation B illustrates the height of proposed dwellings relative to Property 400 Meadow Lane.
- 4.3 The positioning of the proposed dwellings relative to Meadow Lane is approximately 8m from the edge of the road in the east (plots 5-8) to just 6m from the edge of the road in the west (plot 1). This is closer than the existing dwellings (No 431 and, 429/425) on the northern side of Meadow Lane. Again. This is illustrated on Figure 2 below.
- 4.4 Along Meadow Lane it is proposed that a delineated shared surface area will be provided to the west of the current footway on Meadow Lane to provide a formalised pedestrian connection to the site. The Transport Assessment at para 4.3.3 states that this area will be delineated by cobble strips and coloured surfacing and may require some vertical deflection (speed bump). It goes on to state in para 4.3.4 that Meadow Lane will be widened slightly to 4.8m to provide a priority junction access. There may also be a requirement for additional signage.
- 4.5 The DAS shows the treatment of vegetation along Meadow Lane (i.e. hedgerow G9) comprising Category B trees to be pruned and an area of Category C trees to be removed close to the proposed access. The Landscape Planting Plan (drawing number 8854.01.201) shows the existing hedge will be retained and laid with supplementary planting, as necessary.
- 4.6 The length of existing vegetation along the northern boundary of the site, along Meadow Lane, comprises c. 74 linear meters. A gap of c. 25m will be required for the proposed access and a further two c. 2m gaps for each of the proposed pedestrian access points. This means that along Meadow Lane (irrespective of the laying of the existing hedge and planting of new hedgerow) the gaps in vegetation will amount to c. 29m which is a loss of 39%). Importantly the Arboricultural Assessment classifies the hedge along Meadow Lane as a tree group and thus reference to the removal of just 10 linear meters of hedgerows in the Arboricultural Assessment does not relate to the loss of vegetation along Meadow Lane.
- 4.7 Reference to the Transportation Assessment Drawing 5015346-RDG-xx-xx-C-0001 (Appendix E) illustrates the proposed visibility splays. When overlaid with the planting plan (drawing no 8854.01.201 (refer to Figure 2 below) the proposed planting or laid hedge west of the proposed access is likely to fall within the visibility splay. If this is the case, then the loss of vegetation along Meadow Lane would be even greater.





## 5.0 Review of LVA/BHA

### Landscape and Visual Assessment

#### **Baseline Understanding**

- 5.1 Para 2.18 states that the effects on Iffley Conservation Area are considered only in terms of landscape character. It is notable that there is little or no cross reference to the description of the site, Church Way or Meadow Lane as set out in the BHA.
- 5.2 There is no map of the whole conservation area showing the character areas, areas of open space or key views, noted in the Conservation Area Appraisal, which enable an understanding of the area as a whole and the role of the site within this context. This is provided in Figure 1 of this report.
- 5.3 The LVA reviews the LCA Update 2022 on pages 20 and 21 but does not mention the new threats to local character which were identified and set out above at para 3.11. These are highly relevant to assessing the effects of the proposed development and lack of reference to them in the LVA is an omission.
- 5.4 The LVA provides a limited assessment of landscape value. This has been reviewed and supplemented with additional information from the application documents, other documents and an understanding of the baseline situation as set out above. The findings are set out in Table 2 below:

Table 2: Landscape Value Assessment<sup>1</sup>

<b>Valued Criterion</b>	<b>LVA commentary</b>	<b>AFA assessment</b>
Natural Heritage	Agricultural land/grassland, grazed by horses. Hedgerow boundaries. No nature conservation interest that contributes to landscape. Existing hedgerows provide some ecological and visual interest.	Site lies adjacent to Iffley and Oriel Meadows SSSI and forms part of a wider corridor of pasture/meadows forming a setting and context to Oxford. It comprises grassland which has no known history of being ploughed. Hedgerows whilst species poor form part of a habitat network and make a significant contribution to the character of the Church Lane and Meadow Lane. The site is known to have a substantial badger sett. Scrub development reflects a lack of management however grassland is still permanent and semi-improved and valued for carbon sequestration. Mature vegetation on the site contributes to the leafy and rural character of the edge of Iffley and streets. The site is of county value in terms of its habitat for invertebrates.
Cultural Heritage	Within Iffley Conservation Area	The site and Memorial Field are the only remaining pastoral fields within the conservation area. They are noted many times in the CAA as contributing to the special rural qualities of the village. Small scale pastures reflect historic small enclosures on the edge of settlements – a typical pattern forming a soft interface between village and wider floodplain. Fields are associated with historic routes through the village and reinforce the linear morphology of the village.

<sup>1</sup> This assessment is based on 'Assessing Landscape Value Outside National Designations, Technical Guidance Note 02/21, Landscape Institute.

Landscape Condition	Fair condition	<p>The site's condition is affected by lack of management in recent years resulting in some scrub development and lack of management of hedgerows. However, it nonetheless retains its rural small-scale character and contains a number of trees and vegetation which are in good condition and contribute to the character of the site, wider conservation area and wider meadows adjacent. The sense of openness provided by pastoral fields is clearly perceived.</p> <p>The LCA noted that the wider Iffley LCA, of which the site is a part, was of 'high quality.'</p>
Associations	None known	<p>LCA noted perceptions of landscape of Oxford which included <u>'the waterways that thread through the city providing a picturesque, pastoral, and peaceful setting for the buildings'</u></p> <p>The rural characteristics of Iffley are recounted in numerous publications and literature. A Brief History of Iffley notes:</p> <p><i>'Before enclosure in 1830, there were cottagers managing with small strips of land here and there, which they used for vegetables or grazing. .... The thatched house at the corner of Mill Lane was a farmhouse and there was also one in Meadow Lane. River meadows provided good pasture, and Iffley sheep farmers also had grazing rights in Cowley and in Shotover Forest.'</i></p> <p>Iffley Manor, Church and Village by Henry Taunt (Oxford 1909) states:</p> <p><i>There is another way of strolling to Iffley from off the Iffley Road, ... on a dry summer evening it is very pleasant. This can be reached by taking the turn down into the fields opposite Bullingdon Road, and along Meadow Lane as it is called facing the fields ... A pretty grassy field road leads along until it turns up to the left and enters Iffley Village.... It is one of the only places close to Oxford where we have seen the Glow-worm's light shining on the banks by the side of the lane..... (p. 5)</i></p>
Distinctiveness	Site does not show rare, unusual, or distinctive features that differentiate it from other pastoral land	<p>The site comprises open pastoral fields within Iffley CA which are rare. It is the only area where historic routes, open fields and the wider meadows connect. This quality was noted in the CAA and highlighted as contributing to the rural character of the CA.</p>
Recreational Value	No public access. Appreciated at the community level as greenfield land. Site not appreciable from locations outside of the site boundaries	<p>Site comprises open space. Although ground level may not be widely visible due to vegetation, the sense of openness is easily perceived. A site does not need to be publicly accessible for it to have a recreational value especially enjoyment of perceiving nature – as noted in GI Strategy. Meadow Lane and Church Way which offer views across the site and are valued local walking routes.</p>

Perceptual (Scenic) Quality	Rolling topography, hedges, trees, woodland, and varied field sizes adds to scenic quality in wider landscape. Scenic quality noted as good within CA.	LCA 2002 and 2022 highlight high landscape quality and historic integrity of Iffley Village of which the site is a part. The site is important in views to and from the village and has some scenic value derived from its small scale, pastoral and leafy character.
Perceptual (wildness/tranquillity) value	Site is managed and cannot be perceived as wild. The wider study area exhibits a sense of tranquillity away from settlements. Site exhibits some rural qualities but also influenced by proximity of Iffley village.	The site exhibits many qualities associated with nature including open pasture, grassland, trees, and hedgerows. These characteristics and qualities increase perceptions of relative tranquillity and relative wildness. These qualities are highly valued in the context of Oxford as expressed in the LCA and in the context of Iffley as expressed in the CAA. A recently conducted Qualitative Quiet Route Survey for Meadow Lane (Jan 2022) undertaken by Friends of the Fields, Iffley, revealed that 90% of respondents valued the tranquillity of the route and identified the views across the fields, natural habitats, sense of space and sense of history as contributing to perceptions of nature along Meadow Lane.
Function	Function is pasture enclosure by hedges with hedgerow trees	The site performs an important function in reinforcing the rurality of Iffley Village and is central to sense of place and local distinctiveness. It also significantly contributes to the rural character of routes within the village including Church Way, Meadow Lane, and Tree Lane. The site forms an important interface between the built form of the village and the wider meadows and reinforces the linear nature of the village forming land below the 60m contour which drops towards the floodplain. The site contributes to GI functions including social functions – health and wellbeing, heritage, sense of place and tranquillity. It also contributes environmental functions including supporting biodiversity, water management and air quality.

5.5 The LVA concludes that the site is a locally valued area of open space. However, the above analysis illustrates that the LVA did not adequately assess features and characteristics that contribute to an understanding of value. As a result the value of the site is considered to have been downplayed. Given the role of the site in the context of Iffley, and more broadly Oxford, and the extent to which the site expresses valued attributes which contribute to a wider sense of place which cannot be replaced/replicated, it is considered to have a moderate to high landscape value.

5.6 The site is:

- An area of open space;
- Forms quality landscape between buildings;
- Helps to define the spatial characteristics of the village;
- Connects the village to the surrounding rural floodplain;
- Contributes to the character of the village streets.

- 5.7 These were all qualities that were highlighted in the updated LCA as being under threat. They highlight that the site is highly susceptible to housing development which would not retain these characteristics and qualities. The definition of high susceptibility in the LVA methodology (appendix 2) is as follows:
- There is no existing built development present in the landscape
  - There is limited or no screening by trees, woodland, landform and or built form; and or
  - The landscape cannot accommodate the proposed development without suffering substantial detrimental effects on its character.
- 5.8 This concurs with the findings of the 2014 and 2016 HELAA assessments.
- 5.9 When taken together, the above detailed analysis of value and susceptibility leads to the conclusion that the site and its immediate surroundings are highly sensitive to residential development on this site.

### Built Heritage Assessment (BHA)

- 5.10 A review of the BHA provides further understanding of the characteristics of Iffley and the role of the site in perceptions along Church Way and Meadow Lane.
- 5.11 Para 3.4 confirms that the site is experienced along Meadow Lane where the open space of the site is perceived and forms part of the street scene along Church Way.
- 5.12 Para 3.6 confirms that Iffley is an agricultural settlement.
- 5.13 Para 4.13 confirms that Iffley's history is evident through its spatial qualities, built form and natural environment which combine to create its distinctive character and appearance. It goes on to state that *'Iffley retains a strong identity and rural character which is derived in part from its physical and visual association with its undeveloped setting to the west.'* However, the CAA makes clear that this rural character is not attributed solely to the meadows to the west but due to the open spaces and remaining few pasture fields which connect the built form of the village to the meadows i.e. the site.
- 5.14 Para 4.16 identifies that the series of fields to the west of Church Way (including the site) interrupt the built form and allow for long views across them. This has the effect of bringing an understanding of the rural setting of the village into its built core.
- 5.15 Para 4.17 acknowledges that Meadow Lane possesses a more rural quality due to its narrow route, abundance of vegetation and relaxed urban grain and greater permeability between buildings.
- 5.16 Para 4.19 summarises the significance of the CA is its retained sense of connection with its historic rural setting....verdant character of the public realm and open spaces that surround the built form.
- 5.17 Para 4.23 summaries the contribution of the site to the significance of the CA stating:
- 'It is therefore considered that the Site comprises a positive element of the Conservation Area. As open fields, the Site provides an understanding of the historic agricultural setting of the village and their presence within the Conservation Area contributes to its rural character which forms part of the distinct village identity that Iffley retains. The fields within the Site also form part of how the Conservation Area is*

*experienced kinetically, contributing to the transition between the village core and the river corridor to the west along Meadow Lane.'*

## 6.0 Characterising and Visual Effects of the Proposed Development

### Physical and Perceptual Effects

6.1 The LVA considered the effects of development are as follows:

- Disturbance of ground levels.
- Permanent loss of grassland.
- Loss of six trees and two tree groups and parts of two additional tree groups.
- Removal of some hedgerow (note this does not include that along Meadow Lane).
- Introduction of 32 dwellings.

6.2 The LVA does not refer to all of the changes along Meadow Lane resulting from the proposed access arrangements which are understood to include slight widening of the lane, introduction of cobble strips, use of coloured surfacing and possible signage.

6.3 The LVA concludes that changes during construction and Year 1 operation (short term effects) on the site and its immediate surroundings would give rise to a moderate adverse effect. However, if it is accepted that the sensitivity of the site is high then these affects would be Major Adverse. This is defined in the LVA methodology as:

*'The proposed development would: ..... permanently degrade, diminish or destroy the integrity of valued characteristic features and/or their setting; or substantially damage a high quality part of a landscape of regional or greater value.'*

6.4 In terms of impacts on the Conservation Area and Iffley 3F character area (Figure 1 of this report illustrates that they are almost identical in extent), the LVA concludes the effects would be minor adverse and negligible respectively. Given the contribution the site makes to the character of the Conservation Area and that of Iffley Village 3F and the unique qualities of the site in this context, the assessment of effects appears to have been underestimated and are more likely to be moderate-high adverse. The fact that they are felt locally does not change their severity. The localised effects matter because they result in the loss of unique and essential elements of Iffley. This is confirmed by the analysis and conclusion reached in the BHA.

### Visual effects

6.5 Viewpoints 1, 2, 3, 4 and 5 are most relevant to the close proximity views of the site from the surrounding areas of the Conservation Area. It is in these locations that there would be greatest visual effects as confirmed in the LVA para 9.11.

6.6 A review of the visual assessment helps to illustrate the nature of the effects of the proposed development on the character and appearance of Iffley. At para 9.13 the LVA concludes that the proposed development would not result in the alternation or loss of any landscape features or elements important to landscape character, but a closer review of visual effects from Meadow Lane, Church Way and Bridleway 320/19/10 illustrates this cannot be correct.

6.7 Meadow Lane

The BHA at Para 4.17 acknowledges that Meadow Lane possesses a more rural quality due to its narrow route, abundance of vegetation and relaxed urban grain and greater permeability between buildings. It states that *'the rural quality of the road can also be attributed to the open fields to part of the southern side of Meadow Lane (the site)....there are glimpsed views through the hedgerows and a perception of open space beyond; this contributes to the visual; and kinetic transition along Meadow Lane between the village and the meadows beyond.'*

- 6.8 The proposed treatment of the site edge along Meadow Lane would not retain the rural qualities of this route or perceived openness of the site. At best 39% of the existing overgrown hedge would be removed (broken in three locations), it would be laid and therefore significantly reduced in height and scale, and the open frontage of the site would reveal the majority of the built development which would be located closer to the road than existing development on the north side and would be higher. The characteristics described in the BHA would be lost.
- 6.9 The LVA (para 8.30) confirms that the effects on views from Meadow Lane would be major adverse in year 1 and moderate adverse in year 15.
- 6.10 Church Way/ Memorial Field
- LVA at para 8.31 confirms that there would be glimpsed views of the development across the Memorial Field giving rise to a moderate adverse effect at year 1 and a minor adverse effect in year 15. This confirms that the views across Memorial Field will include development. Currently the special quality of views from this location is the lack of visible development to the west and northwest and the dominance of a sense of openness and naturalness.
- 6.11 Church Way/ Bridleway 320/19/10
- From Bridleway 320/19/10 the LVA describes there would be clear views of plots 31 and 32 beyond the stone wall, but that this new development would be seen in the context of existing dwellings along Church Way. This however misses the point that the current view is one which is valued and noted in the CAA and comprises an open corridor of rural landscape extending up to Church Way. These rural qualities will be lost.
- 6.12 Whilst the stone wall along Church Way would be retained, the introduction of built form in an area where there is currently openness, leafy character, and longer distance views, would undermine perceptions of rurality.
- 6.13 The visual effects of the scheme will not be fully mitigated by planting because the greatest change in these views will be a loss of openness and rural landscape and the introduction of built form. No amount of new planting will irradicate the urbanising impact of development and the loss of the rural openness which is such an important quality as expressed in the CAA. The openness of the site and its rural land use as pasture are important elements in views from public routes within the CA and contribute to the character and qualities of Iffley Village. These qualities are acknowledged by the Built Heritage Statement para 5 page ii and would overall be substantially diminished for the village of Iffley.

## 7.0 Issues with the conclusions reached in the LVA and BHA

### Landscape and Visual Assessment

- 7.1 The conclusions reached in para 9.8 of the LVA are considered to underestimate the effects of the proposed development. The localised adverse effects would not lessen over time and the change to the site would impinge materially on landscape/townscape character beyond the site.
- 7.2 The LVA seeks to justify the development of the site through the following statements:
- The loss of open green spaces and long views is acceptable because Manorial Field to the south will remain open and therefore these qualities would be protected.
  - The loss of the open space of the site is acceptable on the basis that it comprises ‘a small part of the designated CA.’
  - The introduction of built form is acceptable because it is part of the component of the CA and is clearly present and characteristic of the CA.
- 7.3 None of these statements addresses the fact that the site is highly valued and plays an important role in the character of the village and surrounding streets. It does not address the fact that the introduction of development in this location would:
- Introduce development below the 60m contour and therefore alter perceptions of the village form/linearity and location in the landscape
  - Undermine the sense of rurality, severing the connection between historic routes, pastoral fields, and wider views of the floodplain.
- 7.4 In terms of design, the LVA justifies the scheme on the basis that it will:
- Introduce new green spaces on the peripheries of the site.
  - Include structural planting which will ensure an appropriate transition to the wider landscape.
- 7.5 However open space within the scheme cannot replace the sense of open rural pasture fields which the site currently exhibits, nor can structural planting provide the transition that small-scale pasture fields provide between built form and wider meadows.
- 7.6 No amount of high-quality design or development can remove the harm caused by the loss of these fields.
- 7.7 Whether the proposed development represents a land use which is already apparent in the area is not relevant and misses the point that the current value of the site and its contribution to local distinctiveness will be permanently lost.
- 7.8 The adverse effects of the proposed development cannot be mitigated. In year 15 the loss of the rurality associated with these fields and the contribution they make to local character will not have been restored.

### Built Heritage Assessment

- 7.9 The BHA (para 4.25) concludes that development of the site will not affect the majority of the attributes and characteristics of the CA.



- 7.10 However, the CAA makes it clear that the rural qualities of Iffley are a key component of its special character. The proposed development will affect rural qualities of the CA which are derived in part from the open pasture fields of the site. Their loss cannot be replicated. The rural qualities of Iffley will undoubtedly be diminished, even if those effects are in a localised area.
- 7.11 The retention of the field to the south (Memorial Field) will not lessen this loss. This is because the proposed development will intrude in the views from Memorial Field and across this open meadow from Church Way, as confirmed in the LVA viewpoint 5. Memorial Field comprises c.0.577ha and the site c.0.989ha<sup>2</sup> therefore even if the views from Memorial Field were left unaltered the area of open field contributing to the rural character of Iffley would be reduced by almost 2/3rds, affecting key views described in the CAA from Church Way and Meadow Lane.
- 7.12 The BHA goes on to state that the design of the proposed scheme has been influenced by its CA location, but this does not remove the harm which will be caused.
- 7.13 In conclusion the BHA seeks to suggest that a level of harm has been accepted by the allocation of the site in the Local Plan – this is not the case as indicated in the supporting text.

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<sup>2</sup> Figures obtained from HELAA 2016

## 8.0 Conclusion

- 8.1 This above analysis confirms that the proposed development will cause harm in the following ways:
- Reduction in the open pastoral fields which contribute to the rural character of Iffley by c. 2/3rds
  - Loss of rural views from public routes across the fields to the wider meadows
  - Loss of rural character of current routes through the village
  - Loss of connection and transition between built form and wider meadows across open fields
  - Loss of appreciation of linear form of the village
- 8.2 The nature of these changes has not been fully explored or understood in the LVA or BHA and the scale of effects have subsequently been underestimated. Even if it is concluded that effects on the significance of the CA are less than substantial, this review has illustrated that development would significantly adversely affect the character of Iffley Village and that it is not possible to satisfactorily address these effects or justify the scheme in the way the LVA and BHA propose.
- 8.3 On this basis the proposed development of the site cannot be regarded as conserving and enhancing the character of Iffley Village or the special qualities of the CA, and it therefore does not achieve the key aims of Local Plan policy SP42 and would be contrary to Policy DH3 and the NPPF. The latter at paragraph 174 reinforces the importance of planning decisions contributing to and enhancing the natural and local environment. The NPPF is clear in requiring all development to deliver high quality and beautiful spaces which make it sustainable and acceptable to local communities (paragraph 126).
- 8.4 The overall planning balance is provided in the Planning Statement by MWA. However, the impact on landscape and the visual effects are considered to be significantly harmful and do not comply with the key requirements of Policy SP42 and the overarching guidance within the NPPF.