

From: [Evelyn Sanderson](#)
To: [Planning Policy](#)
Subject: Reg 19 consultation response
Date: 13 March 2026 15:56:42
Attachments: [Errors and inconsistencies in LP 2045 Reg 19 Consultation documents regarding SPS8 Land at Meadow Lane.pdf](#)
[Justification for Land at Meadow Lane SPS8 not to be taken forward from Reg18 to Reg 19 in Oxford's LP 2045 to be taken forward from LP2036 to LP2045 Reg 19.pdf](#)

Hi

I have submitted a personal response online, to which I would like to attach the following documents.

- Errors and inconsistencies in LP 2045 Reg 19 with regard to Land at Meadow Lane
- Justification for Land at Meadow Lane (SPS8) not to be taken forward from Reg18 to Reg 19 in Oxford's LP 2045

Thank you

Evelyn Sanderson

Submitted to Oxford Local Plan 2045 Submission Draft (Regulation 19) Consultation
Submitted on 2026-03-13 16:02:27

Contact Information

1 Name

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5 Organisation Name (if applicable)

Organisation:

6 In what capacity are you responding to this consultation?

Individual/Member of the public

7 If you are commenting on behalf of someone else, please state their name here. If you are representing more than one person or group we suggest making a separate submission for each.

acting as agent?:

Data Protection Notice and Notification Options

8 Are you happy for the first line of your address and postcode to be published with your response(s)?

I do NOT want my address and postcode to be published with my response.

9 Do you wish to be notified when:

the Council submits the Oxford Local Plan 2045 to the Government?, the Inspector's report is published?, the Oxford Local Plan 2045 is adopted?

10 If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Please note: while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No

11 If you wish to participate in the hearing session(s), please tell us why you consider this to be necessary. Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

reason to attend hearings:

Policy SPS8: Land at Meadow Lane

355 Do you consider that Policy SPS8 is sound?

No

356 If you do NOT consider policy SPS8 to be sound, please select your reasons why from the choices below. Please give precise details for your reasons in the box below - if you wish to support the soundness of the policy please also use this box to set out your comments.

policy is NOT positively prepared, policy is NOT justified, policy is NOT effective, policy is NOT consistent with national policy

sps8 comments:

Land at Meadow Lane has been carried forward from LP 2036 as a matter of course without meeting the requirements for sustainable development that other sites were subjected to.

As such, the allocation is not positively prepared and not justified.

Please see the documents as emailed separately to planning policy

- Errors and inconsistencies in LP 2045 Reg 19 with regard to Land at Meadow Lane

- Justification for Land at Meadow Lane (SPS8) not to be taken

forward from Reg18 to Reg 19 in Oxford's LP 2045

SPS8 is also not effective, as evidenced by the fact it has not been deliverable over the last 5 years since allocation to LP 2036. It now has the highest number of constraints of any policy on LP 2045 and an effectively zero housing allocation.

357 Do you consider that Policy SPS8 is legally compliant? If you do NOT consider policy SPS8 to be legally compliant, please give precise details for your reasons in the box below - if you wish to support the legal compliance of the policy please also use this box to set out your comments

No

sps8 legal compliance comments:

SPS8 does not meet the criteria for sustainable development as set out in the NPPF.

Please see emailed documents for further details.

358 Please set out, as precisely as possible, what change(s) you consider necessary to make the policy legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why the suggested change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

suggested changes to make sps8 sound:

Removal of SPS8 from LP 2045 would render the plan sound and legally compliant.

Local Plan 2045 Reg 19 Consultation: errors in the Local Plan Reg 19 consultation documents for Land at Meadow Lane SPS8

Issue	Reg 19 Consultation Document	Quote from evidence base	Our comment
Housing number	Site Allocation (chapter 8) SPS8	Planning permission will be granted for residential development at Meadow Lane.	Misleading: Fails to stipulate any information about housing numbers.
	Site Capacity Assessment SPS8	Estimated capacity - min (for residential / mixed use): 29 minimum capacity for site	Misleading and unjustified departure from LP Reg 19 draft approved at Full Council (p189/ 1362) (Public Pack)Agenda Document for Council, 26/01/2026 17:00 and Appendix 3: Additional testing after Reg 18 which records that 'allocation does not state number'
	Flood risk sequential test of sites	Potential site housing capacity 29	Misleading and unjustified departure from LP Reg 19 draft approved at Full Council (p189/ 1362) (Public Pack)Agenda Document for Council, 26/01/2026 17:00 and Appendix 3: Additional testing after Reg 18 which records that 'allocation does not state number'
	Sustainability Appraisal Site assessments	Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development. States 'Landowner has expressed an intention to develop this site.'	Misleading: Fails to state that Oxford City Council's housing arm has been unable to take forward a suitable plan for this site with an open planning application since 2022.
		SA objective 4. To meet local housing needs Housing provision ++ Affordable housing provision +	Misleading and unjustified: No housing number or comment is given in the comments box. The

		Scoring criteria given in this document: Very positive impacts (compared to the current situation) ++ Positive impacts (compared to the current situation) +	justification for these positive scores in other site SAs is the ability to deliver more than 10 homes. Inconsistent: The scores are inconsistent with the 'no minimum number' assessments in Cabinet Report and Appendix 3 Additional Testing Since Reg 18
Heritage sensitivity	Site Allocation (chapter 8) SPS8 LP 2045 Reg 19 Consultation Document	Within the Iffley Conservation Area; Grade II listed Townsend Close and Tudor Cottage buildings nearby on Church Way	Omission: Fails to make reference to this ancient meadow as integral to the rural character and setting of the Iffley Conservation Area
	Site Capacity Assessment SPS8 LP 2045 Reg 19 Consultation Document	The site lies within the Iffley Village Conservation Area. • The conservation area appraisal notes the diversity of styles on Church Way, the predominantly rural character of Meadow Lane and the importance of the neighbouring meadows and habitats. • Iffley Village characterised by a historic core, leafy winding lanes, stone walls, historic cottages and later residential development. The low density of development set amongst green spaces plays an important role in the character of the area. • Townsend Close and associated wall, on the corner of Meadow lane and Church Way, is Grade II listed. • Tudor Cottage on Church Way is Grade II listed • The site is within the Rose Hill View Cone. • There is local view sensitivity from Oriel Meadow, the river towpath, Iffley Academy, The Bridleway,	Omission: Fails to make reference to this ancient meadow as integral to the rural character and setting of the Iffley Conservation Area

		Church Way and Meadow Lane. • There is potential for archaeological interest as the site is located within the historic core of a medieval village and there is potential for Iron Age and Roman Remains.	
Biodiversity	Site Allocation (chapter 8) SPS8 LP 2045 Reg 19 Consultation Document	The site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity	Misleading: The statement about 'potential to become important for biodiversity' is incorrect. Oxfordshire's LNRS states that 'LNRSs are intended to identify important areas for biodiversity as well as opportunity areas for its enhancement' Omission: Assessments have already been done that demonstrate biodiversity more than sufficient to qualify as a City Wildlife Site.
		The site is likely to score above the Urban Greening Factor target.	Unjustified because ... (input from Dominic here)
	Site Allocation (chapter 8) SPS8 LP 2045 Reg 19 Consultation Document	c) A detailed assessment of the site's value for invertebrates and the impacts of the proposed development will be required, with mitigation and compensation measures delivered that fully offset these impacts and functionally support notable species. d) Any proposed development on the site will require a detailed assessment of protected species, which should inform a package of mitigation and compensation measures that ensure there are no residual impacts on the protected species.	Misleading: These assessments have already been done by OCC and demonstrate biodiversity more than sufficient to qualify as a City Wildlife Site along with protected species and invertebrates of county and national significance that cannot be mitigated or compensated for on or off site.
	Site Allocation (chapter 8) SPS8	f) A site-specific Flood Risk Assessment (FRA) will be	Misleading: An FRA has already been performed by

	LP 2045 Reg 19 Consultation Document	required and should consider onsite routes and any infrastructure required to reach the access route (Policy G7).	OCC and there is an ongoing EA objection
Movement and access	Site Allocation (chapter 8) SPS8 LP 2045 Reg 19 Consultation Document	k) Opportunities to improve walking, cycling and wheeling links should be taken to link into existing networks.	Misleading: No mention is made that the site is bordered by a designated Principal Quiet Route for Active Travel that is already heavily used for walking, cycling and wheeling. The current situation cannot be improved by housing development.
	Site Allocation (chapter 8) SPS8 LP 2045 Reg 19 Consultation Document	l) The semi-rural character of surrounding streets should be maintained and the perception of these as safe for walking, cycling and wheeling not compromised. To achieve this the site should generate minimal traffic, with low parking levels.	Misleading ..'the perception of these as safe for walking, cycling and wheeling' fails to identify the issue of actual safety, which would be severely compromised by adding any additional vehicle traffic on these narrow lanes with poor junction visibility at both potential access points.

March 2026

Justification for Land at Meadow Lane (SPS8) not to be taken forward from Reg18 to Reg 19 in Oxford's LP 2045

SPS8 policy and site specific SA criteria have not been adequately or accurately updated to take into account the latest evidence base from the Council's own surveys since allocation to LP2036 and new relevant context (e.g new local plan policies allowing housing on employment sites).

SPS8 has not been adequately reviewed against an accurately updated site specific SA criteria and as a result, there has been a failure to identify serious risks of significant negative sustainability impacts (in particular, biodiversity, heritage, access and transport) arising from any development on this site.

In addition there is high risk of loss of a new amenity, Meadow School Iffley, for outdoor education on this site which is

- a) widely supported by local schools and with pilot projects underway
- b) Is to be included in a National Heritage Lottery bid with application deadlines prior to the examination in public (see below)

The SPS8 should be added to the other sites [Table 3: Sites that have been considered \(i.e. they passed the first stage of filtering\), but that are not proposed to have a site allocation policy \(p191 - 192\)](#) that have **not** been taken forward in the LP2045 process from the Reg 18 to allocation at Reg 19 due to risks associated with high sensitivity / unlikely to provide 10+ dwellings / loss of amenity.

The reasons for removal of SPS 8 Land at Meadow Lane from LP2045 provide **similar or higher levels of uncertainty** for achieving any sustainable development on Land at Meadow Lane.

1. Biodiversity (already documented priority species including rare, scarce and protected species) comfortably meeting the criteria for formal designation as a City Wildlife Site and included in the recently published Local Nature Recovery Strategy. There is significant uncertainty about the ability to mitigate loss of biodiversity. It has high multifunctionality and should be Core Green Infrastructure.
2. Heritage (very sensitive ancient meadow providing the rural setting in Iffley's Conservation Area). Any development here is likely to generate substantial harm to this setting and loss of key views from the Principal Quiet Route for Active Travel.
3. Access and transport (winding, narrow lanes with poor sight lines along with designation and heavy use as designated Principal Quiet Route for Active Travel). Significant uncertainty about the ability to mitigate harms to safety and leisure use.
4. Unlikely to deliver more than 10 homes (the LP2036 allocation for 29 homes has been reduced to **no minimum housing allocation** ([p189, Table 1: Sites with](#)

[allocation policies in Chapter 8 that are currently allocated in the Oxford Local Plan 2036:\).](#) Inconsistent with OCC policy of not allocating sites to LP 2045 where assessments show that they do not have the capacity for 10+ dwellings and the treatment of other sites on this basis (1 Pullens Lane, 2 Harberton Mead, Land off Harolde Close)

5. Loss of amenity: There is growing support from local schools for the use of this biodiverse, tranquil and enclosed site for outdoor education as [Meadow School Iffley](#) to benefit areas with high indices of deprivation. Schools say that it would benefit mental and physical health, learning, skills and employment, sense of place and belonging. There is an urgent funding opportunity, with the Meadow School Iffley proposal to be included in [RBOR National Heritage Lottery bid](#) as a potential cornerstone project. However viability for this bid is compromised if this site is not removed from LP 2045 prior to the lottery deadlines: draft plan May 2026, final deadline Oct 2026.

Sites rejected before Reg 18 consultation (Appendix 1)

<https://www.oxford.gov.uk/downloads/file/3951/bgp015-appendix-1-sites-rejected-before-reg-18>

Reasons for rejection:

All or some in flood zone 3b
Core Green Infrastructure
Oxford City Wildlife Site
SSSI/ SAC
Not capacity for 10+ homes
Unlikely to delivery 10+net gain
No safe access
Registered Park and Garden
Historic site
Heritage constraints
Access constraints
Likely wildlife corridor

Examples of rejected sites:

See maps

[oxford-strategic-housing-land-availability-assessment-shlaa-january-2026-appendice
s](#)

347 Iffley Meadow (Oriel Meadow) - Some Flood zone 3b (greenfield), access constraints and likely wildlife corridor function.

222 Gillians Park - Some Flood Zone 3b (greenfield), and Core GI