

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name:

Organisation (if applicable):

Address:

Email:

Date:

Data protection:

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

- ☐ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.
- ☐ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

Do you wish to speak at the examination hearings?

(Please note that the Inspector will decide who to invite to speak)

Yes ☒ No ☐

Do you wish to be notified when:

the Council submit the Oxford Local Plan 2045 to the Government?

☒ ☐

the Inspector's Report is published?

☒ ☐

the Oxford Local Plan 2045 is adopted by the Council?

☒ ☐

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team

Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team

T: 01865 252847

planningpolicy@oxford.gov.uk

www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**

Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph	no applicable	Policies Map	not applicable
Policy Number	SPS8	Sustainability Appraisal	see FOIV response o

Q2. Do you consider that the document:

- | | | |
|---------------------------|---------------------------|-------------------------------------|
| (a) is legally compliant? | ☐ Yes | ☒ No |
| (b) is sound? | ☐ Yes | ☒ No |
| | ☐ | ☐ |

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

- | | | | |
|--------------------------|-------------------------------------|--------------------------------------|-------------------------------------|
| (a) positively prepared? | ☒ | (c) effective? | ☒ |
| (b) justified? | ☒ | (d) consistent with national policy? | ☒ |

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Contrary to the requirements of Regulation 18(3) of the 2012 Regulations and Regulation 8 of the 2004 Act, the Council has acted in breach of s.20(2)(a) of the 2004 Act. The statutory duty at s.20 of the 2004 Act may only be discharged by the Full Council. Part 2 of the 2004 Act provides that there can be no serious scope to dispute that the Council has acted in breach of s.20(2)(a) of the 2004 Act. Ground 2

By s.20(1)(b) of the 2004 Act, the Council must not submit a plan unless they consider it is in compliance with the requirements of the 2004 Act. Policy SPS8: Land at Meadow Lane was the subject of evaluation against the sustainability appraisal criteria. The Council therefore did not have a rationally sufficient evidential basis from which it could conclude that the site was suitable for development. Ground 3

At the beginning of the meeting Cllrs Brown, Smith, Turner, Munkonge and Chapman, declared a conflict of interest. The Council has acted in breach of s.20(2)(a) of the 2004 Act.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

The Council should undertake to refer the question of whether to submit the Plan to the Se

- Place before members at the least a summary of the consultation responses received at k
- Ensure that councillors who currently sit or were previously on the Shareholder and Joint

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

From: [REDACTED]
Subject: [Planning Policy](#)
Date: Reg 19 submission: Friends of Iffley Village
13 March 2026 13:00:10

You don't often get email from reedandsanderson@aol.co.uk. [Learn why this is important](#)

Dear Planning Policy

As advised by your Planning Policy department, there is no space on your Reg 19 Portal to comment on matters relating to the failure of your Reg 18 and Reg 19 processes. Accordingly, this representation by pfd. supplements our representations made on your Reg 19 consultation portal.

Your .pdf text boxes are unstable and do not facilitate feedback. Although I have attempted to fill them in, I also attach a Word document with the same text. Kindly treat this Word .doc as part of our representation.

Kind regards
Martin Reed
Chair, FOIV

Q4. Response

Friends of Iffley Village (FOIV) refers to the Judicial Review Pre-action protocol letter sent by Richard Buxton solicitors to Oxford City Council on behalf of Friends of the Fields Iffley (FOFI), dated 3 March 2026 ref FRI8/1.

FOIV is the organisation for anyone who lives in Iffley or has an association with the village. The organisation is run by its management committee, which deals with matters arising such as proposed developments, parking, and other local issues. FOIV represents local concerns to the City and County Councils and other statutory bodies and can be contacted about local concerns.

FOFI is a separate group whose aims align with Friends of Iffley Village on this matter.

FOIV's interest in the Local Plan concerns Policy SPS8: Land at Meadow Lane. As advised by your Planning Policy department there is no space on your Reg 19 Portal to comment on matters relating to failure of your Reg 18 and Reg 19 processes. Accordingly, this representation by pfd. supplements our representations made on your Reg 19 portal.

Details of the Matter Being Challenged

The resolution of the Council, taken at a meeting of its Full Council on 26 January 2026, to (amongst other things): "Authorise submission of the Oxford Local Plan 2045 to the Secretary of State for examination, following Regulation 19 consultation and any minor amendments made according to recommendation 3 or 4 and subject to there being no matters raised in the consultation that are considered to materially impact upon the Plan strategy."

Proposed Grounds of Claim

Ground 1

By s.20(2)(a) Planning and Compulsory Purchase Act 2004 ("the 2004 Act"), the Council is under a mandatory statutory duty not to submit a plan for examination unless the relevant requirements under the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the 2012 Regulations") have been complied with.

By Regulation 18(3) 2012 Regulations, the Council must 'take into account any representation made to them in response to invitations under [Regulation 18(1)]' when preparing the local plan.

Moreover, by Regulation 8(2) and (3) Environmental Assessment of Plans and Programmes Regulations 2004 ("the 2004 Regulations") a plan or programme for which an environmental assessment is required by the 2004 Regulations, shall not be submitted to the legislative procedure before the account has been taken of the opinions expressed in response to the invitation referred to in Regulation 13(2)(d).

The Council conducted a consultation on the Oxford Local Plan 2042 between 27 June to 8 August 2025. That consultation amounted to an invitation for representations for the purposes of Regulation 18(1) of the 2012 Regulations and an invitation to express opinions for the purposes of Regulation 13(2)(b) of the 2004 Regulations.

Contrary to the requirements of Regulation 18(3) of the 2012 Regulations and Regulation 8(2) of the 2004 Regulations, and thereby s.20(2) of the 2004 Act, the Council did not take into account the representations made in the 2025 consultation prior to resolving whether to submit the plan for examination. Indeed, the Regulation 18 Consultation Report only became available after the Council resolved to submit the plan to examination.

The statutory duty at s.20 of the 2004 Act may only be discharged by the Full Council. Part 5 of the Council's Constitution provides that only the Full Council shall be responsible for development plan documents. It follows that it was the Full Council which needed to be satisfied that s.20 of the 2004 Act had been complied with; in particular, it was Full Council which needed to take into account the consultation responses at the Regulation 18 stage. It was impossible for the Council to comply with that duty, without at the least a summary of the responses before it, at the time it took the decision, see *Save Stonehenge World Heritage Site Ltd v. Secretary of State for Transport* [2024] EWHC 339 (Admin) at [142]-[149].

There can be no serious scope to dispute that the Council has acted in breach of s.20(2)(a) of the 2004 Act by resolving to submit a plan for examination without complying with the duties to take account of the representations made at the earlier stage of consultation.

Ground 2

By s.20(1)(b) of the 2004 Act, the Council must not submit a plan unless they consider it is ready for independent examination. A document will not be ready for independent examination unless the Council consider it to be sound. To be sound, a document must be positively prepared, justified, effective and consistent with national policy (see paragraph 36 NPPF).

Policy SPS8: Land at Meadow Lane was the subject of evaluation against the sustainability objectives in the Sustainability Appraisal. That appraisal identified a raft of uncertainties, e.g.:

- Ecology: noting the site is 'highly ecologically constrained' by virtue of (inter alia) supporting a habitat for scarce invertebrates and badgers. There is no evidence whatsoever to demonstrate the site could be delivered and, even so, at what quantum, without causing harm to those ecological receptors.
- Heritage: the site lies within the Iffley Conservation Area and within the setting of three listed buildings (Tudor Cottage, Townsend Close and Wall and Gate of Townsend Close). There is again no evidence whatsoever that the site could be

developed and, if so, at what quantum, without conflicting with the statutory duties at s.66 and 70 Planning (Listed Buildings & Conservation Area) 1990.

The Council therefore did not have a rationally sufficient evidential basis from which it could reasonably have concluded that the allocation was justified, effective and consistent with national policy. Indeed, that is plain to see by the fact the Council is unable to anticipate delivery of any quantum on the site at all, without the evidence to understand how much (if any) development could come forward. Such an approach is the antithesis of a document which is sound, it was irrational to include such an allocation.

Ground 3

At the beginning of the meeting [REDACTED] declared their membership of the Shareholder and Joint Venture Group (SJVG) for Oxford City Housing Limited (OCHL) which owns the Meadow Lane land. Those members, however, continued to participate and vote on the item.

The SJVG is described as follows: 'The Council has two wholly-owned companies - Oxford City Housing Ltd and Oxford Direct Services ... Each company is an independent legal entity which is entirely separate from the Council. The responsibility to represent the Council as shareholder or owner of each company and joint venture is an executive function which is carried out by the Shareholder and Joint Venture Group which is a committee of the Cabinet.'

Section 24.4 of the Oxford City Council's Constitution related to the Planning Code of Conduct provides that members of the Shareholder and Joint Venture Group should not participate in the determination of planning applications made by the Council's housing delivery companies.

Specifically 24.4 states that: c) Avoiding perception of bias Councillors must listen to the advice of the Monitoring Officer if they may be perceived as having made up their minds in advance or having closed their minds to opposing viewpoints. If a member is a Cabinet member or represents the Council on an outside body and the Council or the outside body is the applicant then particular care should be taken by the member to avoid the perception of bias. If a member is a member of the Shareholder and Joint Venture Group or is otherwise responsible for acting as shareholder or owner of the Council's companies and joint ventures they must not determine planning applications submitted by those companies and joint ventures. The member can choose to speak during the public speaking slot at a Planning Committee or Planning Review Committee meeting but they must notify the chair of their intentions before the meeting begins and must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is debated.

Section 24.4 is very clear that Council members who are also members on the SJVG should not participate in planning decisions. That principle must apply here to decisions to allocate land where the principle of development is established.

More generally, a decision is liable to be quashed if it were tainted by apparent bias. The legal test for the appearance of bias is set out in *Porter v. Magill* [2002] 2 AC 357

at [103]: 'The question is whether the fair-minded and informed observer, having considered the facts, would conclude that there was a real possibility that the tribunal was biased'.

Whether there is apparent bias is to be judged from the point of view of a reasonable observer having regard to all material facts which that observer would have been able to ascertain as a member of the public. Each case turns on its own facts: *Resolution Chemicals Ltd v. H Lundbeck A/S* [2014] 1 WLR 1943, [36]. The principle of apparent bias applies in the context of local government decision-making: *R (Lewis) v. Redcar and Cleveland Borough Council* [2009] 1 WLR 83, [71] [98], [113].

More particularly, the High Court quashed the grant of planning permission in *R (Kelton) v. Wiltshire Council* [2015] EWHC 2853 (Admin), on the basis that one of the participating members was a director of the affordable housing provider which had been identified as a prospective partner to the market element of the development.

A reasonable observer, knowing that [REDACTED], sat on a committee with a responsibility to 'to represent the Council as shareholder or owner' of a company which owned and was promoting land within the Plan for residential development, would conclude there was a real possibility that those councillors were biased in favour of the company's interests. This also applies to Cllrs Upton and Hollingsworth given their previous involvement with the promoter company.

Given that, it was inconsequential for those councillors to simply say that 'they did not have a conflict of interest and considered themselves to take the wider public interests to this matter' as is recorded in the minutes. That is no answer to the claim of apparent bias.

The correct course would have been for those councillors to have withdrawn from that debate of the Local Plan item and not participated or voted on the matter, given the Oxford City Housing Ltd owns the land which is comprised in SPS8 Land at Meadow Lane.

Indeed, that is how the matter has been approached in the past. For example, we note that on 8 March 2022 the minutes of the Oxford City Planning Committee record that: [REDACTED] stated that the officer's report included three references which implied the applicant was Oxford City Homes Ltd (OCHL), the Council's wholly- owned housing company. Whilst OCHL was not the applicant, staff from OCHL had provided some consultancy support for the application. He stated that as the Cabinet Member for housing delivery he had regular engagement with OCHL, and whilst he had not discussed this particular application he would, for the avoidance of any appearance of bias, withdraw from the meeting whilst it was decided.'

The decision of the Council to resolve to submit the Plan was therefore tainted by apparent bias.

But for the participation of those councillors the Local Plan would not have been submitted with the inclusion of Policy SPS8: Land at Meadow Lane. That is because

it was only by virtue of the decision of those councillors to vote down a motion [REDACTED] to delete that allocation, that the Plan has been resolved to be submitted still with the allocation.

Q.5 Response

The Council should undertake to refer the question of whether to submit the Plan to the Secretary of State for examination pursuant to s.20 of the 2004 Act to its Full Council and not rely on the 26 January 2026 resolution. The Council must also undertake at that meeting to:

- Place before members at the least a summary of the consultation responses received at both Regulation 18 and 19 stages.
- Ensure that councillors who currently sit or were previously on the Shareholder and Joint Venture Group (SJVG) for Oxford City Housing Limited (OCHL) do not participate and vote in the debate on the decision whether to submit the Local Plan for examination, so long as the Local Plan contains allocations of land owned and promoted by OCHL.

1. Friends of Iffley Village (FOIV) refers to the Judicial Review Pre-action protocol letter sent by Richard Buxton solicitors to Oxford City Council on behalf of Friends of the Fields Iffley (FOFI), dated 3 March 2026 ref FRI8/1.
2. FOIV is the organisation for anyone who lives in Iffley or has an association with the village. The organisation is run by its management committee, which deals with matters arising such as proposed developments, parking, and other local issues. FOIV represents local concerns to the City and County Councils and other statutory bodies and can be contacted about local concerns.
3. FOFI is a separate group whose aims align with Friends of Iffley Village on this matter.
4. FOIV's interest in the Local Plan concerns Policy SPS8: Land at Meadow Lane. As advised by your Planning Policy department there is no space on your Reg 19 Portal to comment on matters relating to failure of your Reg 18 and Reg 19 processes. Accordingly, this representation by pfd. supplements our representations made on your Reg 19 portal.

Details of the Matter Being Challenged

5. The resolution of the Council, taken at a meeting of its Full Council on 26 January 2026, to (amongst other things): "Authorise submission of the Oxford Local Plan 2045 to the Secretary of State for examination, following Regulation 19 consultation and any minor amendments made according to recommendation 3 or 4 and subject to there being no matters raised in the consultation that are considered to materially impact upon the Plan strategy."

Proposed Grounds of Claim

Ground 1

6. By s.20(2)(a) Planning and Compulsory Purchase Act 2004 ("the 2004 Act"), the Council is under a mandatory statutory duty not to submit a plan for examination unless the relevant requirements under the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the 2012 Regulations") have been complied with.
7. By Regulation 18(3) 2012 Regulations, the Council must 'take into account any representation made to them in response to invitations under [Regulation 18(1)]' when preparing the local plan.
8. Moreover, by Regulation 8(2) and (3) Environmental Assessment of Plans and Programmes Regulations 2004 ("the 2004 Regulations") a plan or programme for which an environmental assessment is required by the 2004 Regulations, shall not be submitted to the legislative procedure before the account has been taken of the opinions expressed in response to the invitation referred to in Regulation 13(2)(d).

9. The Council conducted a consultation on the Oxford Local Plan 2042 between 27 June to 8 August 2025. That consultation amounted to an invitation for representations for the purposes of Regulation 18(1) of the 2012 Regulations and an invitation to express opinions for the purposes of Regulation 13(2)(b) of the 2004 Regulations.
10. Contrary to the requirements of Regulation 18(3) of the 2012 Regulations and Regulation 8(2) of the 2004 Regulations, and thereby s.20(2) of the 2004 Act, the Council did not take into account the representations made in the 2025 consultation prior to resolving whether to submit the plan for examination. Indeed, the Regulation 18 Consultation Report only became available after the Council resolved to submit the plan to examination.
11. The statutory duty at s.20 of the 2004 Act may only be discharged by the Full Council. Part 5 of the Council's Constitution provides that only the Full Council shall be responsible for development plan documents. It follows that it was the Full Council which needed to be satisfied that s.20 of the 2004 Act had been complied with; in particular, it was Full Council which needed to take into account the consultation responses at the Regulation 18 stage. It was impossible for the Council to comply with that duty, without at the least a summary of the responses before it, at the time it took the decision, see *Save Stonehenge World Heritage Site Ltd v. Secretary of State for Transport* [2024] EWHC 339 (Admin) at [142]-[149].
12. There can be no serious scope to dispute that the Council has acted in breach of s.20(2)(a) of the 2004 Act by resolving to submit a plan for examination without complying with the duties to take account of the representations made at the earlier stage of consultation.

Ground 2

13. By s.20(1)(b) of the 2004 Act, the Council must not submit a plan unless they consider it is ready for independent examination. A document will not be ready for independent examination unless the Council consider it to be sound. To be sound, a document must be positively prepared, justified, effective and consistent with national policy (see paragraph 36 NPPF).
14. Policy SPS8: Land at Meadow Lane was the subject of evaluation against the sustainability objectives in the Sustainability Appraisal. That appraisal identified a raft of uncertainties, e.g.:
 - Ecology: noting the site is 'highly ecologically constrained' by virtue of (inter alia) supporting a habitat for scarce invertebrates and badgers. There is no evidence whatsoever to demonstrate the site could be delivered and, even so, at what quantum, without causing harm to those ecological receptors.
 - Heritage: the site lies within the Iffley Conservation Area and within the setting of three listed buildings (Tudor Cottage, Townsend Close and Wall and Gate of

Townsend Close). There is again no evidence whatsoever that the site could be developed and, if so, at what quantum, without conflicting with the statutory duties at s.66 and 70 Planning (Listed Buildings & Conservation Area) 1990.

15. The Council therefore did not have a rationally sufficient evidential basis from which it could reasonably have concluded that the allocation was justified, effective and consistent with national policy. Indeed, that is plain to see by the fact the Council is unable to anticipate delivery of any quantum on the site at all, without the evidence to understand how much (if any) development could come forward. Such an approach is the antithesis of a document which is sound, it was irrational to include such an allocation.

Ground 3

16. At the beginning of the meeting [REDACTED] [REDACTED] declared their membership of the Shareholder and Joint Venture Group (SJVG) for Oxford City Housing Limited (OCHL) which owns the Meadow Lane land. Those members, however, continued to participate and vote on the item.
17. The SJVG is described as follows: 'The Council has two wholly-owned companies - Oxford City Housing Ltd and Oxford Direct Services ... Each company is an independent legal entity which is entirely separate from the Council. The responsibility to represent the Council as shareholder or owner of each company and joint venture is an executive function which is carried out by the Shareholder and Joint Venture Group which is a committee of the Cabinet.'
18. Section 24.4 of the Oxford City Council's Constitution related to the Planning Code of Conduct provides that members of the Shareholder and Joint Venture Group should not participate in the determination of planning applications made by the Council's housing delivery companies.
19. Specifically 24.4 states that: c) Avoiding perception of bias Councillors must listen to the advice of the Monitoring Officer if they may be perceived as having made up their minds in advance or having closed their minds to opposing viewpoints. If a member is a Cabinet member or represents the Council on an outside body and the Council or the outside body is the applicant then particular care should be taken by the member to avoid the perception of bias. If a member is a member of the Shareholder and Joint Venture Group or is otherwise responsible for acting as shareholder or owner of the Council's companies and joint ventures they must not determine planning applications submitted by those companies and joint ventures. The member can choose to speak during the public speaking slot at a Planning Committee or Planning Review Committee meeting but they must notify the chair of their intentions before the meeting begins and must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is debated.

20. Section 24.4 is very clear that Council members who are also members on the SJVG should not participate in planning decisions. That principle must apply here to decisions to allocate land where the principle of development is established.
21. More generally, a decision is liable to be quashed if it were tainted by apparent bias. The legal test for the appearance of bias is set out in *Porter v. Magill* [2002] 2 AC 357 at [103]: 'The question is whether the fair-minded and informed observer, having considered the facts, would conclude that there was a real possibility that the tribunal was biased'.
22. Whether there is apparent bias is to be judged from the point of view of a reasonable observer having regard to all material facts which that observer would have been able to ascertain as a member of the public. Each case turns on its own facts: *Resolution Chemicals Ltd v. H Lundbeck A/S* [2014] 1 WLR 1943, [36]. The principle of apparent bias applies in the context of local government decision-making: *R (Lewis) v. Redcar and Cleveland Borough Council* [2009] 1 WLR 83, [71] [98], [113].
23. More particularly, the High Court quashed the grant of planning permission in *R (Kelton) v. Wiltshire Council* [2015] EWHC 2853 (Admin), on the basis that one of the participating members was a director of the affordable housing provider which had been identified as a prospective partner to the market element of the development.
24. A reasonable observer, knowing that [REDACTED] [REDACTED] sat on a committee with a responsibility to 'to represent the Council as shareholder or owner' of a company which owned and was promoting land within the Plan for residential development, would conclude there was a real possibility that those councillors were biased in favour of the company's interests. This also applies to Cllrs Upton and Hollingsworth given their previous involvement with the promoter company.
25. Given that, it was inconsequential for those councillors to simply say that 'they did not have a conflict of interest and considered themselves to take the wider public interests to this matter' as is recorded in the minutes. That is no answer to the claim of apparent bias.
26. The correct course would have been for those councillors to have withdrawn from that debate of the Local Plan item and not participated or voted on the matter, given the Oxford City Housing Ltd owns the land which is comprised in SPS8 Land at Meadow Lane.
27. Indeed, that is how the matter has been approached in the past. For example, we note that on 8 March 2022 the minutes of the Oxford City Planning Committee record that: 'Councillor Hollingsworth stated that the officer's report included three references which implied the applicant was Oxford City Homes Ltd (OCHL), the Council's wholly- owned housing company. Whilst OCHL was not the applicant, staff from OCHL had provided some consultancy support for the application. He stated that as the Cabinet Member for housing delivery he had regular engagement with

OCHL, and whilst he had not discussed this particular application he would, for the avoidance of any appearance of bias, withdraw from the meeting whilst it was decided.'

28. The decision of the Council to resolve to submit the Plan was therefore tainted by apparent bias.

29. But for the participation of those councillors the Local Plan would not have been submitted with the inclusion of Policy SPS8: Land at Meadow Lane. That is because it was only by virtue of the decision of those councillors to vote down a motion (proposed by [REDACTED] to delete that allocation, that the Plan has been resolved to be submitted still with the allocation.

Action the Council is Expected to Take and Proposals for ADR

The Council should undertake to refer the question of whether to submit the Plan to the Secretary of State for examination pursuant to s.20 of the 2004 Act to its Full Council and not rely on the 26 January 2026 resolution. The Council must also undertake at that meeting to:

- Place before members at the least a summary of the consultation responses received at both Regulation 18 and 19 stages.
- Ensure that councillors who currently sit or were previously on the Shareholder and Joint Venture Group (SJVG) for Oxford City Housing Limited (OCHL) do not participate and vote in the debate on the decision whether to submit the Local Plan for examination, so long as the Local Plan contains allocations of land owned and promoted by OCHL.

Response ID ANON-M2Q4-48W6-W

Submitted to Oxford Local Plan 2045 Submission Draft (Regulation 19) Consultation
Submitted on 2026-03-13 13:11:11

Contact Information

1 Name

Name:
Martin Reed

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

5 Organisation Name (if applicable)

Organisation:
Friends of Iffley Village

6 In what capacity are you responding to this consultation?

Charity or Community Group

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.

Yes

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:

I am Chair of Friends of Iffley Village, the local organisation that represents residents on planning matters. Policy SPS8, in respect of a site within our village, is unsound for the reasons set out in my response.

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:

Policy is NOT positively prepared

It is not positively prepared as it disregards and misinterprets the clear evidence that has emerged that this site is not suitable for sustainable development. The policy appears to seek to rely on a flawed assumption that because it was in Local Plan 2036 that this is sufficient. Any development here is unsustainable and would cause very high levels of harm to the ecology, and to the rural Iffley Conservation Area, which can neither be justified nor mitigated. Access is difficult and would endanger users of the Principal Quiet Route for Active Travel along Meadow Lane and Church Way. The site is partly in Flood Zone 3 and there is an ongoing objection from the Environment Agency.

Policy is NOT justified

The site has no minimum housing allocation (i.e. a 'zero' allocation). The Council is therefore accepting that the site is so constrained that it may be unable to deliver any development in a sustainable and/or policy compliant manner. It is therefore unjustifiable to allocate it.

The new evidence from the Council's own surveys since the Horse Fields was allocated to the current Local Plan 2036 shows how sensitive this site is: 15 constraints have been identified – the highest number of any site on the new Local Plan.

The reasonable alternatives for housing in Oxford are on the brownfield sites currently designated for employment. A new employment policy (Policy E1) makes it possible for land-owners to deliver housing alongside employment on these sites. It would be even more effective to redesignate them for housing, particularly as there have been so many 'windfall' sites for new tech companies in redundant retail and offices e.g. Clarendon Centre, Botley Road.

Policy is NOT effective

Again, a zero allocation makes no guaranteed or reliable contribution to meeting housing needs and so cannot be effective. Oxford City Council have not been able to deliver housing on the Horse Fields over the 5 year period of the current Local Plan. They have now learnt about how sensitive the site is, in particular for ecology, the conservation area and access and have reduced the number of houses on the allocation from 32 to effectively zero, with no certainty of being able to deliver any housing at all. This is clearly not an effective policy.

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:

The fact that the policy is not positively prepared, effective or justified means that it cannot meet the tests of soundness or legal compliance.

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:

Any development at Land at Meadow Lane SPS8 (known locally as the Horse Fields) would be unsustainable and cannot be delivered in a viable fashion in accordance with local and national policy. This makes the allocation unsound, and site SPS8 should be deleted from LP 2045