

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name: Katharine Owen

Organisation (if applicable):

Address:

Email:

Date: 24.03.2026

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.

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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
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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

Policies Map

Policy Number

Sustainability Appraisal

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.

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.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

158.1 SPS8 Unsound b.c.d. [blue] 158.1 - blue highlights were above 5000 characters
158.2 Policies map Unsound b. [yellow] (portal limit) so left out the last 2 comments from portal
158.3 SA. [green]
158.4 consultation (legal test) [purple] 158.4 has been inputted under Ch.1 in the portal
13 March 2026. N.B on portal note for .1 and .3 that full rep contains extensive additional detail

Consultation Response to the proposed Oxford Local Plan 2045, Regulation 19 stage: Land at Meadow Lane, SPS8, the 'Horse Fields'.

Summary.

The purpose of this document is to set out the reasons why the inclusion of the site allocation SPS8 'Land at Meadow Lane' should be removed from the proposed Oxford Local Plan 2045, which is due to be set before the Planning Inspectorate (Secretary of State) for their examination, following Regulation 19 consultation, including any minor amendments made.

This document sets out why the inclusion of the site is *unsound and not legal*.

Regulation 19 consultation stage means that only certain matters can be raised at this stage. A plan must not be submitted unless the council considers it to be 'sound'. The plan must be '*positively prepared, justified, effective and consistent with national policy*' under the National Planning Policy Framework.

This document is more detailed on heritage considerations; a wider picture is given, so as to aid understanding of the situation.

Site allocation SPS8 will be referred to in this document as 'the site'.

Contradiction in SPS8 housing numbers in local plan.

Firstly, within Regulation 19 consultation documents in the site allocation, chapter 8, for SPS8, and in the SPS8 sustainability appraisal (which gives SPS8 a ++ score for hosting delivery), there is no information about the minimum number of housing units, meaning zero (see below). However, in the site capacity assessment for SPS8 and in the flood risk assessment, the estimated capacity minimum for residential/mixed use is 29.

Secondly, between Regulation 19 draft as approved by Full Council and Regulation consultation documents, there is misleading and unjustified departure from local plan regulation 19 draft approved for council, that states; 'allocation does not state number' – public pack of agenda document for council, 26/01/2026 and appendix 3: additional testing after regulation 18.

Unsound SPS8 sustainability appraisal.

The sustainability assessment with the local plan demonstrates how the site has been misunderstood, analysed insufficiently and it downplays the significance of the site. There is unsound assessment of heritage significance, which is detailed below.

Heritage significance.

There is a concerning lack of evidence base for heritage considerations in several places. The local plan allocation calls the site: '*Green undeveloped land (no public access) previously used for horse grazing*', for some reason failing to describe it as an ancient meadow, a rare survival and downgrading its historic significance in itself and indeed as an integral part of the Iffley conservation area. Heritage is considered more later in this document.

The policy in local plan has not been positively prepared. It relies on a highly questionable assumption that because the site was included in the local plan 2036, that it was sufficient to carry this over into the next local plan.

However, it will be shown in this document that any development would be unsustainable and would cause *significant harm* to the character and appearance of Iffley conservation area and to its setting and harm to the setting of listed buildings and a non-designated heritage asset.

The National Planning Policy Framework (NPPF), as revised, in 'Conserving and enhancing the historic environment' chapter 16, states the obligations of local planning authorities:

*'203. **Plans** should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

(d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

(e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

(f) the desirability of new development making a positive contribution to local character and distinctiveness; and

(g) opportunities to draw on the contribution made by the historic environment to the character of a place.'

*206. Local planning authorities should make information about the historic environment, gathered as part of **policy making** or development management, publicly available.*

The draft local plan is a plan, clearly, including allocated sites, thus it must take into account the above. It does not, for site SPS8, as set out below.

The site.

The site is situated off Church Way and off Meadow Lane, Iffley. The site comprises of.99 hectares of green fields, trees and hedgerows, in an approximate 'L' shape. The only building is a tall shed at the hedge by Meadow Lane.

Both the Orion heritage report and the Bioscan ecology report submitted as objections to the planning application noted a lack of clarity of actual ownership of a strip of land to the west. One hopes that the local plan map is correct on that point.

There is an ancient stream at the bottom of the field to the west, flowing into the Thames and forming an important part of the landscape and history, dictating field boundaries; the other side is Oriel Meadow. But this stream is downgraded and called a '*drainage ditch*' erroneously in local plan in the site allocation section. The amount of water in it has reduced for example, since the 1875-78 OS map. The small stream runs north-south, emerging at Iffley Lock; an old lane is shown alongside it. Those would have helped to make the site useful for transport and access to the north. Around this area, on site, the land is marshy and wet.

There is a gentle slope running down to the west, helping with drainage in this floodplain area. Beyond this, are Oriel Fields and beyond them are Iffley floodplain meadows, an SSSI.

Ownership.

The site is owned by Oxford City Housing Ltd, an independent entity from the Oxford City Council, effectively its housing arm and they liaise to further the council's development aims. The site was sold to Oxford City Housing Ltd in November 2020, from the Donnington Hospital Trust trustees, who acquired the site with the aim of developing a minimum of 30 houses on the Horse Fields, liaising with the council. Oxford City Housing Ltd also bought the adjacent Memorial Field at Church Way at that time. OCHL now is called OxPlace.

History and uses of the site.

Ownership brings us onto the history of the site, being an important consideration. The site of 2.5 acres was part of the 24 acres in the Manor of Iffley gifted to Sir Richard Abberbury of Donnington near Newbury. Rents from Iffley Manor funded his Donnington Hospital charity almshouses. So, Donnington owned the site from 1393 to 2020, a considerable period of time. They also owned 'the greater part of Iffley' according to Henry Taunt.

Key point: it cannot be stressed too much that *the site has never been built on* apart from sheds: this is a crucial consideration for heritage, ecology and carbon sequestration. Historically, there might well have been open shelters for animals, leaving little or no evidence, but otherwise the site was clear.

The key to understanding the landscape of East Oxford and Iffley is the geography of its principal rivers and floodplains, with areas of higher ground between them. The Thames in its pre-altered state was a wide, shallow braided stream that had many channels and side channels. Oxford is at a junction where gravel terraces form a point of land between the Thames and the Cherwell, crucial for humans from the Palaeolithic times. The Thames runs through a gap between areas of higher ground,

called the Corallian Hills which cause the topography to rise; at Iffley and Rose Hill is a prominent geological dome or hill called Rose Hill that overlooks the Thames. This hill can be seen in the Ordnance Survey map of 1830. Church Way follows the topography of the hill, curving round it.

Key point: Iffley's historic core was chosen as a place to live by its earliest settlers partly because it was on the hill, overlooking the Thames as a defensible and accessible raised site. It is possible that the hill called Rose Hill was once the site of a pre-Roman hill fort, as a hypothesis. Roman kilns have been found in Rose Hill in Annesley Road, a clay-rich area.

There have been no recorded archaeological excavations on the site, however the site allocation notes '*potential presence of Iron Age and Roman archaeological remains*'.

Key point: Iffley has a very long history, and the first recorded mention was in the chronicles of the monastery of Abingdon *between 941 and 946*, when it was called Gifteleia; this shows that Iffley must have been in existence for some time before then, to warrant its inclusion in such a record.

Key point: Iffley was mentioned in the *Domesday Book of 1086*. Iffley was developed as a linear village with the Church and the water mill at the river as key foci. The high-status important Romanesque Norman Iffley Church was built from 1160-1170 *so this indicates an important settlement by then*.

The 1761 John Rocque map and the 1767 Jefferys map show the main roads of Iffley with few buildings along the roads. The 1811 Stevens OS drawing and the 1830 First Series OS show meadows to the west and the site.

Turning to the enclosures of the land, at the start of the 18th century, large areas of East Oxford were farmed in open fields as they had been for centuries, and a farmer would cultivate several separate ridge and furrow strips in common fields. The process of enclosure led to open fields being rearranged into smaller fields and farmsteads enclosed by hedges or fences which created the agricultural landscape still visible today. Smallholders would work the land. Iffley was enclosed in 1830 as seen in the 'Inclosure Award' map of 1830. The plots are numbered, indicating the tenants. However, the northern plot is marked as 'R. Danbe': the Danbe or Danby family were the millers at the Iffley watermill by the Thames, had various interests in the village and grew to be prosperous. The listed Danby arch is part of the Oxford Botanic garden.

Major landowners at enclosure included Donnington Hospital as Lords of the Manor of Iffley – as stated above, the trustees sold the site in 2020. Donnington had a substantial land holding (some with cottages in Iffley) including beyond Oxford.

Briefly, OS maps continue to show the site as undeveloped although its setting changed with the development of (most significantly) Townsend Close (house) and

its walls, Tudor Cottage in Tudor Close, Quince Cottage at 402 Meadow Lane, 425 Meadow Lane (Donnington Farmhouse) and 66 Church Way. The old cottages at the Memorial Field owned by Donnington Trust were let to fall into ruin and were pulled down as they did in several places in Iffley.

Uses in most recent times up to the sale was horse grazing at various times up to 2020 by Iffley villagers, under agreements with Donnington: hence the local name of 'Horse Fields'. Now, the site is a hay meadow. In the memorial field, Les White, a local shepherd, kept and grazed his flock of sheep there for 40 years until his death c.10 years ago.

In the 1830s, there was a scheme to build a railway through Iffley and a plan dated 1837 by IK Brunel show the ownerships and uses of the sites affected, including the site in question. This is further evidence of the uses. The detailed map shows plot 29, part of the site, at the bottom corner of Meadow Lane, as being orchard, owned by Donnington Trust, leased and occupied by Robert Danbe [aka Danby]. Plot 30 is the oblong of land just above that, with a paddock and outhouse, leased and owned by Deodatus Eaton. Plot 34 is the rest of the site, extending down to the stream: a meadow, owned by Donnington Trust and leased and occupied by Thomas Smith (map 4, Great Western Railway, 1837).

Other adjacent plots, eg 33 show a house, carpenter's shop and outbuildings, owned by Donnington Trust. By 1837, Iffley was a thriving agricultural village providing employment for the typical range of workers and illustrates social and economic history. By contrast, the Memorial field next to the site was partially built on and has some made land. The caretaker's cottage has been at one time a butcher's shop, then a grocer's shop, previous to which it was an alehouse named the 'Five Bells'. On the actual site of the Memorial Hall once stood a couple of two-roomed cottages, with earth floors, and must have been miserably damp buildings. In the Institute grounds the Boy Scouts have built their own headquarters ('Bygone Days in Iffley').

Key point: Importantly, the *site is an extremely rare survival of East Oxford's agricultural history and use and illustrates the life of the working classes in Iffley*. Agriculture was the main economy. Large country houses were built from the late 18th century in Iffley, adding to the demographic, with wealthier people living in the village, often associated with the university.

Listed buildings and the impacts of developing the site.

The following are listed buildings in the setting of the site, all being in the conservation area. As a reminder, the local plan states that the estimated capacity minimum for residential/mixed use is 29 (site capacity assessment) however is contradictory as it fails to give any numbers in the site allocation chapter 8, meaning zero units.

The nearest listed building to the site is Townsend Close, actually a building, and its wall, piers with moulded cap stones and finials at the entrance at Meadow Lane are all listed grade II, forming group value. The walls and gate are listed separately, which means that the listing inspector for the then Department of Environment considered them of sufficient interest to warrant a separate listing entry.

The house was built in the early-mid 19th century in a good example of Italianate villa style with pediments, brackets and pilasters, being rendered and painted white, forming a landmark. The high walls are located at the corner plot of Meadow Lane and Church Way, and the group is tall and very prominent. There are several similar villas in Oxford, mostly in Park Town. The building is what is called in historic building terms 'high status' and 'polite architecture' and is evidence of a different class of occupiers, often associated with the colleges, or wealthier families associated with the city enjoying a location accessible to the city, being set within large grounds in Iffley, such as the listed Priory of c. 1840.

Key point: There would be intervisibility with the site due to location and the height of buildings and clearly the legibility of the site and the understanding of the historic settlement pattern would be harmed significantly. This is an important part of what makes the conservation area so special.

Tudor Cottage on Church Way also was 'high status' building dating to Tudor times. It is grade II listed and attractive, with original timber framing, in contrast to the prevailing stone and brick in the area. It is an important survival of timber framing and a Tudor house in Iffley. Although its historic curtilage has been reduced by modern development at Tudor Close, it is prominent on the street and has co-visibility with Townsend Close. Tudor Cottage was part of the Donnington estate, being leased out by the manor. As with Townsend Close, development of the site would harm the inter-visibility with Tudor Cottage.

Quince Cottage at 402 Meadow Lane is not listed nor on the council's heritage asset register, however it has interest and is a 'non-designated heritage asset'. A NDHA can be identified during the planning process as allowed in national policy and as NDHAs are identified. The cottage is on the same side of the lane as the site and an important part of setting. The cottage was constructed in the early 19th century of coursed rubble stone with ashlar quoins, typical of Oxford cottages of that time and it is evidence of the growth of the agricultural village. It is set against the pavement line, and this elevation has no windows, for privacy. It is visible in views along Meadow Lane and as above, development of the site would harm the inter-visibility with other assets.

Unlisted Donnington Farmhouse at 431 Meadow Lane is the closest building to the site on Meadow Lane and faces it on the other side, set back from it with a large garden. It is in the OS map of 1921. It is constructed of coursed rubble stone and has prominent gables to its front elevation. It forms part of the setting of heritage

assets and is evidence of agricultural settlement. Its historic value derives from association with Professor Sir John Grimley Evans, a pioneer of geriatric medicine.

Unlisted 425 Meadow Lane dates to sometime between 1830-1875 from OS mapping.

Hedges.

Hedges and trees are part of the character and appearance of the conservation area.

Excluding what are now garden or property boundaries, there are three hedges which can be dated approximately. The hedge along Meadow Lane and the hedge along the ditch or stream along the northern edge of the site are probably Inclosure-age hedgerows. The internal one is/was hawthorn dominated, (hawthorn being an ancient species used for hedging) and so would the Meadow Lane one has been originally, but (and as typical of a village-edge/peri-urban location) there has been a bit of interplanting with some cherry plum, hornbeam, etc. The northernmost 'hedge' is actually a line of trees or a strip of wet woodland that has grown up along what would once an open carrier ditch at the edge of the historic floodplain (i.e. pre landfill of Oriel Field etc), is diverse and contains some interesting species and is probably not much older than 200 years or so.

The 1875-78 OS notates mature trees along this boundary which can be taken to mean that a hedge or tree line would have been here since at least the C18th. The other boundaries have been subsumed into property or garden boundaries to a greater or lesser extent, and there are some surviving mature trees associated with these, including some fine oaks.

Any ecological value or carbon sequestration value of the hedges are not assessed properly in the local plan documentation.

The hedges have not been managed for many years by either sets of owners, and no hedge 'laying' has been done for many years. The internal hedge was partly removed by Oxford City Council's contractors in 2021, for no known reason.

The meadows have affinities to and could be called '*floodplain meadows*' in current ecological terms. They have certain species of that type showing that they may have come from floodplain meadows and are capable of restoration to that. The critical driver for survival or loss of these grassland is agricultural improvement, which appears to have been lacking. The evidence on site shows that there are certain surviving elements of pre-war agriculture, thus not having post-war agricultural intensification.

97% of wildflower meadows in the UK have been destroyed. The owners have failed to produce an accurate assessment of baseline ecology, for reasons unknown. However, a chartered ecological firm has submitted this as part of the previous

consultation process, yet the council persists in allocating the site for development. Documents for the last planning application show that the owners have not assessed the ecology properly and there were many serious gaps eg '*no bats were found*', although there are in fact 7 species including nationally rare species nearby.

The previous planning application proposed a footpath through the middle of a badger sett with heavy infrastructure and hard standing nearby. The development would severely reduce the foraging area on the site.

Contractors for the owners actually drove heavy machinery to dump what appears to be soil, bricks and stone, *near the protected badger sett although the owners knew of its existence*, which was a crime under the Protection of Badgers Act 1992; endangering it so that the police had to be called on site because the owners broke the law. They also dumped soil near the 150 year-old oak trees, so there is *no confidence that the ecology will be protected*.

As of February 2026, there are two areas of Japanese knotweed and red flags showing where they are, one area with a sign warning 'do not cut'. One area of knotweed is where the contractors dumped material.

Oxford City Council has a policy on meadows to help wildlife and tackle climate change, however this is in total conflict with the site allocation.

The local plan alleges: '*Most of the site within LNRS mapping for areas that could become important for biodiversity*' which is unsound and inaccurate, as the site is *already* highly important for biodiversity and obviously development would cause significant harm to that biodiversity that cannot be mitigated nor justified. In any case, the meadows have been there for 1,000 years; it is obvious that biodiversity here cannot be replicated elsewhere, say by planting small trees.

Stone wall.

This is the boundary to Church Way and is prominent in views. The wall is constructed of coursed rubble stone with the same stone type laid on edge to form the cap, as is the correct historic form. It is a typical rural wall in Iffley and a positive contributor to the character and appearance of the conservation area. There is a typical five-bar wooden gate leading to the site. Views can be enjoyed of the site over the wall and indeed in views around the area of the green opposite the Tree Hotel and in views along Tree Lane, which slopes up towards Courtland Road. The wall extends to 66 Church Way and extends some way along the street.

Historic wall openings are vulnerable to being widened considerably to allow for development access, as pointed out in the conservation area appraisal. An example can be seen at 66 Church Way and widened openings in the village, destroying the legibility of the site.

Meadow Lane.

Meadow Lane is a very old name for the western part of the animal drove road from upper pastures, part of which were in what is now Rose Hill, via 'Sheepway' (now Tree Lane) to the medieval common pastureland on the floodplain meadows next to the river and the 'lower field' somewhat further north. Its character nearest to the site derives from many mature trees, wildlife habitats, rural atmosphere such as having no pavements and relative seclusion and proximity to open spaces at Oriel Fields, the site and others. Meadow Lane is notated as being 'private road' on the Iffley Inclosure map of 1830.

Meadow Lane is a *designated quiet route*, a mostly traffic-free rural lane in a low traffic neighbourhood, enjoyed by up to 900 walkers and cyclists daily for active travel and leisure (Friends of Iffley Fields survey of c. 2012). Surely that character would be harmed significantly by the works required to facilitate two-way traffic at the development entrance at Meadow Lane. Parking bays were proposed at Meadow Lane. However, site allocation states at (k): *'opportunities to improve walking, cycling and wheeling links should be taken into link into existing networks'*: surely this is a contradiction. At (l) *'The semi-rural character of surrounding streets should be maintained and the perception of these as safe for walking, cycling and wheeling not be compromised. To achieve this, the site should generate minimal traffic, with low parking levels'* – but the last proposal was for 17 car parking spaces, which in reality would be insufficient for the type of people who own high-value houses in prestigious areas in Oxford (as this is), as I have often seen, there are usually around three to four cars. Clearly it would be impossible to 'maintain' that character. Finally, at (m): *'The vehicle access point should be chosen to maintain transport impacts and to minimise impacts of the character of the conservation area'* – again, that would be impossible. The local plan fails also to address the risk to the listed wall and piers at Townsend Close.

Residents and visitors would have to park outside the site and along Meadow Lane and there would be much greater traffic generally, meaning harm to the rural, more quiet character of that part of the conservation area and its setting.

Iffley conservation area.

Iffley conservation area was designated by Oxford City Council in 1969, which is a very early designation date in terms of conservation areas. It was extended in 1985 to the north-east. The conservation area appraisal was adopted in 2009 and it is a good and sound appraisal.

It is worth setting out what the council described accurately as the conservation area's special interest:

Summary of significance:

- i. The position of Iffley, on the outskirts of the city, but retaining its character as a separate and independent village community.*

- ii. Its history as a rural community is still evident in the character of many of the buildings and surviving green spaces, grazed by sheep, horses and cattle.*
- iii. The village is within walking distance of Oxford, and continues to be used as an area of refreshment and recreation for city residents.*
- iv. The towpath and riverside meadows, both within and beyond the boundary, form an important part of the natural and ecological habitats of the village.*
- v. Although the meadows [Oriell Meadows] are not within the conservation area, they are essential in maintaining the green setting around the village, separating it from Oxford's suburbanisation.*
- vi. The architectural heritage of the village is heterogeneous, from 12th century to contemporary, the character of which depends on a delicate balance between ancient and modern.*
- vii. The gardens, trees, hedges, walls and remaining open spaces are as important as the built elements in creating the unique character of the conservation area.*
- viii. The lock and river although beyond the boundary of the conservation area are important to the village in terms of the historic pedestrian route to Iffley along the towpath.*

Key points: The appraisal notes Meadow Lane's predominantly rural quality, gently sloping down to the meadows flanking the western boundary of the conservation area. 'The track and fields adjacent on the western side are just beyond the boundary but together add an important element of rural character to the setting of the conservation area.'

The site is described here thus: '*to the south-west side of the [Meadow] lane 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*'.

Key features

- 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.*

As a reminder, conservation area appraisals as a rule do not seek to describe every 'positive contributor of any types, since there is not space to do that; not being included does not mean that some elements contribute positively to the significance. The same principle applies to statutory listed building descriptions.

Key points below: Iffley is a 'place apart' with its own strong identity. Iffley has its own sense of place, quite different from adjacent Rose Hill or Donnington with their dense, relatively lacking in trees and suburban character.

The historic Iffley retains rural characteristics to the west and east and *the site is part of that hinterland and is evidence of past agricultural practices*.

The site has *rarity value in Oxford city*, never having been built on, apart from sheds.

Key point: the contribution made to the character and appearance of the conservation area is clearly very high; the site is a '*positive contributor*' to it.

An important issue is that any development would cause *significant harm to the character and appearance of the conservation area, which it is desirable to preserve or enhance*. It is well accepted that development can in theory take place in a conservation area, provided that the legal and national and local policy requirements are met. However, in this instance, *no* development could take place without *significant harm* to the character or appearance of the conservation area. This is a major statement and one not taken lightly. Of course, the city has housing needs: but not at the site, because it is *exceptional* – and the proposed local plan fails to describe or take account of the site's exceptional qualities.

The developer would want to build a minimum number of dwellings, car parking spaces and other requirements, in order to make the development viable. If one takes the number of houses even as 7 (to illustrate the point), then even that would cause significant harm. The constraints are such, that development must cause that level of harm. Since the inclusion of the site on the draft local plan enables development, inclusion must be removed.

Meadow Lane's character would be harmed significantly, as stated above: the part of the lane running south-east is in the conservation area and shares a long hedge with the site. Meadow Lane turns north-south leading to the city and the southeast part of that stretch is within the conservation area. North of that, some of Meadow Lane is in within the setting of the conservation area.

Intangible values, eg noise or smell, form part of heritage significance as proved in *Lewison LJ in R (Palmer) v Herefordshire Council 2006*, so this cannot be dismissed; the lane is quiet and the air smells fresh.

All the values of evidential, historic, architectural and historical need to be seen as interdependent.

Views.

Development would result in the destruction of open space in the conservation area and significant harm to its historic development pattern and morphology, part of its characteristics. The open fields visible from Meadow Lane and Church Way would be infilled and suburbanised, destroying the character of the fields located

immediately off these roads, and being highly visible, even if units have two storeys, as can be seen particularly when leaves are not on the trees and the gaps in hedges.

Standing in the site looking from various locations towards the west, Oriel Fields can be seen, by the Thames, giving a very pleasant view of open countryside, increasingly rare in Oxford. That view is at risk from being lost at the site. This wide view in the setting of the conservation area of the water meadow is important and ties the site into its riparian landscape, illustrating the historic importance of the settlement pattern and showing how close it is to the river.

Another view can be appreciated from Tree Lane in the area around the Tree Hotel and from the rising slope up Tree Lane towards Courtland Road and Rose Hill. This last view is not in any council documentations and is worth experiencing on foot.

The site is within the Rose Hill View Cone, in 'The Oxford View Cones: Views from South East Oxford, part 6, Oxford City Council and Oxford Preservation Trust, 2015 noting: *'The layout of development, following the contours of the hillside allowed views northward from the hillside across open spaces such as the allotments next to Lenthall Road. Here the allotments provided a green foreground with the rooftops of historic houses in Iffley Village seen amongst the foliage of large gardens at the foot of the hill'*. The assessment notes the risks to the view from development in Iffley.

Other views are from the Thames towpath on the west side, looking east into the site, showing a most attractive riverside scene with no development. There are views from Oriel Meadows looking east across the site. Donnington Farmhouse and Townsend Close are visible in the cooler months.

So much development has taken place in the last few years (and since the designation of the conservation area) and is proposed in the local plan, that there would be cumulative harm caused by building on the site. It is now an increasingly rare survival. Clearly, development must fail completely to *'preserve or enhance'* the site: it is an ancient meadow and development of buildings, car parking spaces and roads are completely opposite to an ancient open meadow. It forms an important part of the green landscape including Memorial Field, Memorial Field, Iffley floodplain Meadows and around Iffley Lock. There would be *cumulative harm* to the conservation area with continuing infill development, making Iffley more of developed suburb. The setting is also at risk. Case law underpins the importance of cumulative harm and setting.

Key points: Any benefits of development are immaterial for local plan 2045, given the now effectively zero housing allocation for this site and would not be sufficient to outweigh the substantial harm that even a small amount of development would cause.

The harm to the setting would be high and setting is an important consideration.

In the site allocation brief description at chapter 8 of the Regulation 19 consultation document, there is a major and inexplicable omission of any reference to the ancient meadows, their history and important contribution to the character and appearance of the conservation area.

The conservation area appraisal notes the vulnerabilities, as follows. There is a lack of consistency between the acknowledgement of these and the local plan at SPS8.

Vulnerability

ix. The remaining open green areas, the spaces between buildings and the large gardens that characterise part of the village, are vulnerable to development.

x. The stone walls, long recognised as a valuable and characteristic feature of the village, are vulnerable to loss due to the increased demand for on-site parking and building extensions.

xi. Rising volumes of traffic threaten the tranquil and rural nature of the village. Parking on the narrow lanes often leads to pavement parking making pedestrian access difficult, whilst potentially damaging the pavements and kerbs, together with the loss of gardens to hard standing for off-road parking.

xii. Development of the riverside meadows adjacent to the conservation area would impact adversely on the green and rural character of the setting and approach to the village.

In Bedford Borough Council v Secretary of State in 2013 regarding 'harm' to heritage assets, the impact on significance was found so serious that significance drained away and substantial harm caused. 'Harm' at S66 of the Listed Buildings Act 1990 has considerable weight and so is doing no harm in the first place. *Prevention of harm is the first aim.*

Ecology and carbon sequestration.

Development would cause significant harm to the ecology; these harms cannot be justified nor mitigated. There is a well-established badger sett at the site including an albino badger. They are active and evidence of their digging and their pathways can be seen in the field off Church Way also with paths leading out of the site to their foraging areas. Experts at Bioscan have assessed the biodiversity and ecology of the site, which has high significance such as for invertebrates.

Ancient meadows store large amounts of carbon, many times richer in biodiversity than arable land, parks or sports pitches.

There can be no biodiversity net gain from destroying a highly efficient meadow, releasing its captured carbon, to developing it with buildings and infrastructure with high associated carbon costs.

Transport issues remain and access would be very difficult and dangerous at times. There is a 90 degree bend at the T-junction of Meadow Lane and Church Way with a tall listed brick wall (to 'Townsend Close', a listed building) abutting the very narrow pavement.

Should the site be developed, in reality, it is highly likely that the lane would have to be made more urban, to allow site vehicles.

At construction stage, it is very difficult to see how the listed wall could not suffer from demolition in part, from construction vehicles and deliveries. Most site development causes damage, as I have observed often in Oxford, even with site protection being imposed as planning condition. The site is very constrained.

The 'principal quiet route for active travel' along Meadow Lane and Church Way is enjoyed by many pedestrians walking into the city centre and for recreation (including as a circular walk).

The site is partly within flood zone 3 and there remains an objection from the Environment Agency from the last planning application.

The local plan identifies 15 constraints to development at the site, more than any other site in the local plan. The fact that the local plan has zero housing units as its starting point for the site evidences the great difficulties here. Also, stating that '*Other complimentary uses will be considered on the merits*' shows that the plan does not really set out what is appropriate for the site: which is it? That cannot be sound.

It is difficult to understand why the site remains as a development site when the council has been appraised by independent heritage and ecology experts of the full constraints at the planning application consultation: these make it clear that the site is not suitable for development. Policy for SPS8 shows that the council does not realise the biodiversity and invertebrate value, making this unsound.

The sustainability appraisal includes unresolved and uncertain issues including that the site is within Iffley conservation area and is within the setting of listed buildings and of non-designated heritage assets, as set out above. The plan fails to show that the site could be developed without failing to meet the duty: '*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority ... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*' -S66. And '*It shall be the duty of a local planning authority from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas.*' - S71. And '*In the exercise with respect to any buildings or other land in a conservation area, ... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*'. -Planning (Listed Buildings and Conservation Areas) Act 1990.

There is an insufficient evidence base to show that the site allocation was justified, effective and consistent with national policy. In the site allocation, zero units are stated, thus impacts cannot be evaluated and the duties in respect of conservation areas and listed buildings and the settings of listed buildings cannot be assessed.

The statutory duty cited above regarding *'the desirability of new development making a positive contribution to local character and distinctiveness'* in a conservation area cannot be complied with because the meadows are an important part of the conservation area, yet policy would allow it to be all but destroyed. It would be grossly insufficient enough that a development would have for example references to the local vernacular building stock:

Donnington Trust in 1994 tried to get the site allocated for housing in the local plan but the Inspector at Planning Inquiry stated: *'There will always be strong development pressures within Oxford, therefore the council is particularly concerned about the cumulative effects of infilling which could give rise to town cramming if all sites are not carefully considered and controlled.'* – para 9.

The previous 2014 Strategic Housing Land Availability Assessment (SHLAA) rejected as a plan allocation, stating: *'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. This constraint remains'*. Yet in 2017, the Housing and Employment Land Availability Assessment (HELAA) said the site could accommodate low density development. Other documents allege that development was possible and the previous local plan includes it as an allocation. What had changed? The answer is that the site had become available for development and was earmarked to be sold to the housing arm of the council and now they own it.

Although there is no current planning application, the previous (undetermined) application is useful in considering the impacts. 22/03078/FUL, 'planning permission for residential development (Use Class C3), access arrangement and public open space, landscaping, associated infrastructure and works including pedestrian and cycle routes. Land Bounded By Meadow Lane And Church Way', proposing 32 residential units and 17 car parking spaces. It was clear that significant harm would have been caused by that proposal.

However, it is important to remember that the Local Plan (site allocation section) puts forward the number of proposed dwellings as zero – the number of dwellings is simply not stated, it is impossible to see how the lack of a number gives certainty to calculations of proposed housing in the local plan as a whole.

Indeed, because zero is proposed, it is impossible for any assessment to be made on a zero.

Consultation issues.

In addition to the above, I noticed that there appeared to be a problem in procedure carried out, which make it difficult for the council to proceed. I watched the committee on YouTube on the council's YouTube platform.

Consultation responses (in the form of a Regulation 18 Consultation Report) to the first stage of the public consultation at Reg 18 stage were not published with the Council's report to Full Council Committee held on 26 January 2026, so the Council did not take into account the public representations made to them as required, under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. (The responses could have been made in a summary document.) Therefore, councillors did not have proper knowledge of information and objections made to them, so as to inform their decisions on the Local Plan, being a plan which has major consequences for the city, on its environment, on inhabitants and those who work and visit the city. I am concerned that councillors were not provided with sufficient and independent information to form judgement on the resolution made at Full Council Committee to submit the Local Plan to the Secretary of State.

It is not too late for the site to be removed from the Oxford Local Plan 2045.

In fact, the Full Council Committee held on 26 January 2026 resolved to "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 materially impact upon the plan strategy" [my italics]. Therefore, there is provision made for the site to be removed from the site allocations as a minor amendment. The number of dwellings for the site starts at zero: that shows that the site is minor to the local plan.

If the site was to be removed before the local plan is submitted to the Secretary of State, then the problems with the allocation would not hold up the local plan process.

There have been multiple opportunities for the site to be removed from the local plans local plan 2040 and local plan 45 and *several experts gave their advice at consultation of the unsuitability of the site.*

It could have been removed before; omissions and errors were flagged up before at consultation (I wrote to object to the inclusion of the site on heritage grounds).

Paragraph 39 of the National Planning Policy Framework (2021) emphasises the importance with Government places on pre-application consultation and engagement:

"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community."

In conclusion, local plan site SPS8 is wholly unsuitable for development and should be removed from the draft local plan. The allocation would lead to total loss of significance. National policy for heritage revolves around two key concepts: to sustain and enhance significance of heritage assets and avoiding or minimising harm to that significance. SPS8 fails to accord with those, which makes the allocation unsound and not legal.

I ask respectfully of the council/the planning inspector that site SPS8 is removed from the local plan.

Katharine Owen, BA Hons (Courtauld), MA (Arch Cons), Dip Ind Arch, PG Cert (UD), IHBC (full member).

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