Examination of the Local Plan 2045

Matter 4, Issue 1: Site Selection Methodology

Morning session 24 November 2026

Hearing statement by Evelyn Sanderson

Respondent ID 70

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1. SPS8 Land at Meadow Lane is neither a reasonable nor deliverable site for allocation to Oxford's new Local Plan 2045. The serious conflicts of SPS8 with plan strategy amount to multiple criteria for sifting out at all 3 stages of the LP2045 site selection process.

2. The Council's justification for the SPS 8 allocation to LP 2045 relies on its current allocation (SP42) to LP 2036 and an extant 4 year old planning application by OxPlace, Oxford City Council's housing company.

3. This justification is unsound as it conflicts with the robust evidence base from the City Council's own surveys and other expert submissions to the planning application. The evidence demonstrates that SPS8 has multiple serious constraints to any development and meets a host of criteria that led to sifting out of other sites.

4. Retaining SPS8, despite failing to meet the site selection criteria that filtered out sites with similar constraints, amounts to differential treatment for the continued allocation of SPS8 by Oxford City Council.

Q1 Paragraph 2.11 of the Developing Site Allocations Topic Paper states that at Stage 1, sites were not assumed to be deliverable if there was serious conflict with the Plan's strategy and no mitigation was available. Examples cited include conflicts with 'Core Green Infrastructure'. What sites were sifted out at this stage based on conflicts with 'Core Green Infrastructure', and was the approach justified and positively prepared given the need for housing in Oxford?

5. SPS8 has insurmountable physical and environmental constraints that should have resulted in filtering out at Stage 1:

a) Flooding: the site is partially in Flood Zone 3b.

b) Ecology:
In LP 2036 it was designated as G1(Protection of Green and Blue Infrastructure network) but this was ignored in the previous SP42 allocation (p192 - 3 Adopted LP 2036).

LP 2045 repeats/compounds this error by demoting SPS8 from protected green /blue infrastructure to supporting G1B despite new evidence to show its biodiversity value:

- Surveys since allocation in LP 2036 showing that SPS8 has ecology sufficient for designation as a City Wildlife Site but for which the City Council as an 'arms length' landowner has failed to propose.
- Inclusion in Oxfordshire's Local Nature Recovery Strategy (LNRS). The recent Statement of Common Ground with Natural England references alignment between TVERC NRN and Core Green Infrastructure protection. However the TVERC NRN was a 'stop gap' pending publication of the Oxfordshire LNRS in autumn 2025. The TVERC NRN is not included in the LP 2045 evidence base.
- It is clear that for all intents and purposes the abundant biodiversity of SPS8 (with species of county and national importance) and its contiguity with Oxford's Blue / Green infrastructure makes its ecology a key environmental constraint.

6. In addition SPS8 should have been filtered out as undeliverable: no mechanism has been given for mitigating the multiple very sensitive constraints. Having not been deliverable in the LP 2036 LP period there is no evidence to support otherwise for LP 2045.

Q2 What is the estimated number of sites (and scale of housing proposed) that were sifted out at Stage 1?

7. Multiple selection criteria used to filter out sites at Stage 1 are key constraints that apply to SPS8:
    - Historic site / Heritage constraints
    - Access constraints
    - Oxford City Wildlife Site (for which SPS8 has sufficient biodiversity)
    - Wildlife corridor
    - Unlikely to delivery 10+ biodiversity net gain
    - Close proximity to SSSI
    - All or some in flood zone 3b

    However these constraints did not result in the rejection of SPS8.

8. In particular, filtering out of sites adjacent to SPS8 with the same sensitivities provides evidence of disparate treatment of SPS8 at Stage 1:

a) Land at Church Way (388) is adjacent to Land at Meadow Lane (389) and categorised in the SHLAA as having identical attributes: allocation to LP 2036, FZ3b, within 200m of SSSI, Iffley Conservation Area View Cone, GI Network (supporting). Land at Church Way was sifted out at Stage 1 due to unsuitability.

However the opposite conclusion was made for Land at Meadow Lane (389, SPS8). The justification given for suitability was as an *'Adopted site allocation OLP2036, SP42 [now SPS8] establishes that site is suitable for residential uses'* which was also the case for Land at Church Way.

The only difference between these 2 sites on the SHLAA[1] is the landowner development intention (in both cases Oxford City Council's housing arm) to proceed with an extant 4 year old planning application.

388	R	R	Land at Church Way	0.577	OLP2036 Evidence Base	Iffley CA View Cone GI Network (Supporting)	Flood Zone 3b	A small part of the site is within Flood Zone 3b and also has important GI function. Not suitable	No evidence of intention from landowner to develop. Not available	Site is viable typology as it is greenfield. Site is viable	The site is not suitable or available
389	A	R	Land at Meadow Lane	0.99	OLP2036 SP42 Emerging OLP2045 SPS8	Entire site within Iffley CA Within View Cone GI Network (Supporting)	Flood Zone 3b Within 200m of SSSI	Adopted site allocation OLP2036 SP42 establishes that site is suitable for residential uses. Site is suitable	Planning application 22/03078/FUL (yet to be determined) indicates landowner intent to develop. Site is available	Planning proposal. Site is viable	Planning application and confirmed landowner interest with recent application submitted. Site expected to be developed within Local Plan time period.

b) Iffley Meadow (347), [known locally as Oriel Meadow} is an adjacent site filtered out due to: *'Some Flood zone 3b (greenfield), access constraints and likely wildlife corridor function.'* These constraints equally apply to SPS8 particularly as it would require identical access along Meadow Lane.

347	R	R	Iffley Meadow	6.42	OLP2036 Evidence Base	GI Network (Supporting) Site includes Local Wildlife Site (Oriel Meadow) Entire site within Green Belt Adjacent to Iffley Conservation Area View Cone/High Buildings Area	Flood Zone 3b Within 50m of a SSSI (Iffley Meadows) Constrained access for vehicles	Site has important GI function which needs to be protected, and latest flood maps (2025) indicate small part is Flood Zone 3b (greenfield). Previous flood maps indicated a large part of the site was FZ3b (greenfield) and Core GI, therefore potential heritage and biodiversity impacts not tested in detail. Likely wildlife corridor function, and biodiversity constraints (Local Wildlife Site) would need further testing. Not suitable	Landowner expressed intention to develop (2025) Site is available	Site is viable typology (greenfield) Site is viable	Site is not suitable.

Q3 What were the reasons for discounting sites at Stage 2? Was the approach, including the use of the SA framework, adequate and robust?

Stage 2 assessment of SPS8[2] was not adequate or robust. This should have led to SPS8 being added to the list of sites rejected before the Reg 18 consultation.[3]

The SA framework downplays its constraints. For example on biodiversity the SA states that SPS8 is '*unprotected open space*' (Objective 3) and '*Site contains no nature designations.'* whilst acknowledging that '*it would qualify at least as an Oxford City Wildlife Site (if not a Local Wildlife Site)* (Objective 10).

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1 Oxford-strategic-housing-land-availability-assessment-shlaa-january-2026-appendices Table A (no page numbers given)

2 Oxford Local Plan 2042 – Interim Regulation 18 stage site assessment form incorporating sustainability appraisal

3 Sites rejected before Reg 18 consultation (Appendix 1)

The failure of the Council to propose designation of SPS8 for OCWS or LWS status given their own evidence base which supports this is a breach of the legal duty on public authorities to take appropriate action within Section 40 NERC 2006 as amended by the Environment Act 2021.

Q6 Following the Regulation 18 stage, what were the reasons for not taking forward preferred site options?

10. The SPS8 should have been included with the other sites not taken forward following the Reg 18[4] stage due to risks associated with high sensitivity. Rather than delete SPS8 it was taken forward with no minimum housing allocation.

When compared with the sites removed following Reg 18, it is clear that SPS 8 has similar or higher levels of uncertainty for achieving any sustainable development.

Sensitivity

1. Biodiversity - already documented priority species including rare, scarce and protected species, SPS8 comfortably meeting the criteria for formal designation as a City Wildlife Site is included in Oxfordshire's Local Nature Recovery Strategy and contiguous with the Green / Blue wildlife corridor.

Requests were made, both in the Reg 18 consultation responses and also directly to OCC, to designate the site as OCWS in keeping with survey evidence, but no referral for designation was made - a failure of a further opportunity to meet the legal duty to meet Section 40 of the NERC Act 2006.

There is significant uncertainty about the ability to mitigate loss of biodiversity. The Trust for Oxfordshire's Environment has declined to take the BNG due to the site's ecological sensitivity.

Natural England in the SoCG acknowledge the high biodiversity value of SPS8 and states that:
'reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network'. But this is in conflict with their statement that '*The site is identified as supporting green infrastructure (Policy G1) so enhancement of the remaining GI will be required to mitigate loss'*

4 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).

2. Heritage - the Iffley Conservation Area appraisal describes the importance of the meadow, its boundaries and bordering lanes as key components of the rural character of ICA whilst providing the setting for 3 listed buildings.

Any development here is likely to generate significant harm to the ICA's rural character. There would be a loss of key views across the Rose Hill Cone which are accessible to the users of the designated Principal Quiet Route for Active Travel (OXR18), see section below on amenity, as well as urbanisation of the rural lanes.

The Oxford Preservation Trust response to the Reg 18 consultation supports the removal of SPS8 on landscape and heritage grounds:

389 Land at Meadow Lane - We object to the allocation of this site. We recognise that this proposed allocation relates to a previously allocated site in the Adopted Local Plan 2036. This is an opportunity to review that allocation based on the availability of additional information regarding its landscape and ecology value. This site is within the G1 Green Infrastructure Network. It is too ecologically sensitive to be developed and serves as an important part of the Green Infrastructure Network.

*The site also makes a significant contribution to the wider rural setting of Iffley. The Iffley Conservation Area Appraisal (August 2009) highlights the "predominantly rural quality" of the area and identifies the site as an important a*rea of green space.

3. Access and transport - the winding narrow drovers' lanes that border SPS8 have poor sight lines. Used predominantly for active travel as a designated route (OXR18) their main use is for active travel, serving a high volume of walkers and cyclists for commuting, leisure and tourism. There is significant uncertainty about the ability to mitigate the harms of any additional vehicle traffic to these vulnerable users.

It is noteworthy that this site was previously refused allocation to the LP 2011 due to heritage and access constraints. The biodiversity value was not known at that time.

<u>Housing delivery</u>
The housing allocation for 32 homes in LP 2036 has been reduced to no minimum housing allocation in LP2045. This is inconsistent with OCC's policy and treatment of other sites and not effective plan making.

<u>Loss of amenity</u>
Although not physically accessible to the public, there is visual, auditory and heritage access to SPS8 for active travel users of the bordering lanes with benefits to health and wellbeing as evidenced by comments from the community Qualitative Survey of the Meadow Lane Quiet Route (see appendices):

Regular use of this rural-feeling route as a local. Also as a quiet link to the towpath and town and beautiful circular walk.

The de-stressing, calming feeling that comes with birdsong and being close to the natural habitats of the hedge along the southern side of Meadow Lane and the sense of space and fields behind them - and the clean fresh quality of the air they circulate.

With a 9 year old brother and busy working parents, it provides a quiet and safe place for us to relax without worrying family. Covid has affected many negatively. Rural areas for much of the community has been a emotional relief during the pandemic. This one just happens to be relief for a huge community. It is rare in such a big city you find that country-side-friend-liness

Alternative use

As proposed to OCC, there is huge potential for further amenity if this land can be made available in its entirety (to preserve biodiversity and manage footfall) as a dedicated site for outdoor education in nature as Meadow School Iffley (see Appendices). This proposal has the support of local primary, secondary and special needs schools within a 15 min walk.

Schools say that it would benefit mental and physical health, learning, skills and employment, sense of place and belonging and social cohesion. The catchment areas of these local schools serve areas with high indices of deprivation. The Meadow School Iffley proposal has been included in the RBOR National Heritage Lottery bid as a cornerstone project by the BBOWT (the local wildlife trust). However viability for this bid is compromised if this site is not removed from LP 2045.

Consultation feedback

The summary of Reg 18 Consultation feedback on the allocation of Land at Meadow Lane (site 389)[5] runs to 8 pages of objections to the multiple site constraints accompanied by Council responses claiming mitigation (p 93 - 101). None of this feedback prevented the allocation from going forward to Reg 19 nor led to the provision of any evidence of how these constraints could be mitigated in practice.

Q8 How did the Council consider the suitability of sites already allocated for development in the Oxford Local Plan 2036?

11. It is clear that the Council did not consider the suitability of SPS8 when carrying it forward from LP 2036. The justification given in the LP 2045 SHLAA is that it was previously allocated. However, since the original allocation, the council has now accumulated a robust evidence base for SPS8 showing the number and extent of the serious conflicts with plan policies but has not been able to demonstrate any viable mitigation strategies.

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5 The summary of Reg 18 Consultation feedback on the allocation of Land at Meadow Lane (site 389)

12. The history of failed attempts to allocate to previous Local Plans (1994, 2001, 2014) attests to the insurmountable constraints around heritage and access. Allocation to LP 2036 occurred despite a site visit in 2017 to review the ecology that did not actually gain access to the land. What changed to enable allocation was that the site became available for development.

Q9 How did the Council consider necessary infrastructure requirements of proposed allocations, such as the need for highway improvement works or new and improved services, such as education and health?

13. The infrastructure requirements for SPS8 access have considerable interdependent constraints for highways safety (limited sight lines) and heritage harms (listed brick walls at Townsend Close and rural stone walls at Church Way and hedgerow on Meadow Lane) which the Council have not addressed. It is clear they would have to be demolished / removed in whole or in part, causing significant harm to heritage assets with urbanisation of the ancient drovers' routes along Church Way to Meadow Lane.

Q10 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

14. The responses to the preceding questions show that the selection process for SPS8 was not robust. It allowed SPS8 to be carried forward from LP 2036 without demonstrating how it could meet the required criteria given the supporting evidence base available.

15. It is notable that SPS8 is being subject to differential treatment compared to sites with fewer sensitivities that have been sifted out at Stage 1, Stage 2 and following Reg 18 preferred options consultation.

16. Continued inclusion at Reg 19 would appear to amount to circumventing the Local Plan process on the grounds of an extant planning application by the Council's housing arm. Retaining SPS8 in LP 2045 would allow the many unaddressed significant sustainability and viability requirements to continue to be inappropriately deferred to the planning application stage, which has remained open for the last 4 years.

It is anticipated that scrutiny of these issues at EIP will confirm that SPS 8 is not justified, effective or compliant with National Policy, and deleted from Local Plan 2045.

Appendices

1. Summary of Qualitative Survey of the Meadow Lane Quiet Route
2. Meadow School Iffley Business Plan