EXAMINATION OF THE OXFORD LOCAL PLAN 2045
MATTER 5: SITE ALLOCATIONS
Land at Meadow Lane, site allocation SPS8
26 November 2026

Hearing Statement
Katharine Owen, IHBC (Full), Respondent number 158
10 November 2026

I was a principal heritage officer at Oxford City Council, from 2009, I retired in June 2023 and Friends of the Fields Iffley approached me to advise them on heritage issues affecting SPS8.
I submitted a detailed consultation response in March 2026 at the Regulation 19 stage.
I submit that policy SPS8 allocation is *unsound* and should be deleted from the Plan.

Q4, 1st para: 'Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned?'

1. No, the allocation is not justified or consistent with national planning policy insofar as heritage matters are concerned, for the following reasons.

2. The site's significance (crucial in the NPPF) has not been set out by the council in this local plan, which shows a lack of understanding of the significance.

3. The NPPF states: 'Heritage assets… are a resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'- para 202. "Conservation is the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance", but at the constrained site, clearly development by its nature can neither sustain nor enhance that significance to the heritage assets.

4. The local plan shows that the site has been misunderstood, analysed insufficiently and it downplays its heritage significance.

5. The heritage significance of the site includes:
   - Its highly rural character;
   - The lack of buildings except sheds on it;
   - The last remaining ancient meadow in Iffley;
   - Its tranquil character;
   - The Rose Hill view cone and the assessment of that, notes the risks to that view from development in Iffley;
   - Local views, in, to, out of, around and across the site including the Thames, Oriel Fields, Meadow Lane and various points in the conservation area, as set out in the Iffley conservation area (ICA);

- It is an extremely rare survival of east Oxford's agricultural history and use and illustrates the life of the working classes in Iffley;
- It illustrates social and economic history;
- Its key location and setting, with Meadow Lane adjacent, an ancient drover's route for livestock movement to Temple Cowley and elsewhere;
- Its field patterns, subdivided at the Iffley field enclosures in 1830 and the historic associations in Oxford with the owners and tenants;
- Its location near to the river Thames;
- The wide view to the water meadows ties the site to its riparian landscape. It is a 'place apart' with its own strong, unique identity;
- The long stone wall at Church Way;
- The site is a positive contributor to the character and appearance of the conservation area;
- The site is crucial to the historic understanding and setting of the wider conservation area;
- Iffley's origins dating back at least to Anglo-Saxon times.

6. The local plan allocation downgrades the heritage of the site as 'Green undeveloped land', failing to describe the ancient meadow, a rare survival in Oxford.

7. "Conservation is the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance", but clearly development by its nature can neither sustain nor enhance that significance to the heritage assets at this site.

8. The plan does not provide any information to demonstrate that allocation is justified. No assessment has been made public and for example we do not know whether the council's own 'character assessment toolkit' (for development analysis) was used. There is no audit trail to explain why the council has changed its mind so drastically.

9. The local plan (Appraisal of impacts for Local Plan 2045 site allocations (p117 - 119) Heritage) alleges about the three listed assets: '…nearby however this site does not appear to form the setting of these heritage assets'. This is wrong: the site is in the setting of the listed assets. Also, the plan fails to point out that the listed assets are in the setting of the conservation area.

10. Also, it alleges: 'This site is an unprotected undeveloped greenfield site', thus downplaying it.

11. The council has prepared Heritage Impact Assessments but has chosen not to for SPS8. For other sites it agreed some more HIA work after Historic England's objections for other sensitive sites but not this one in the ICA.

12. Historic England's advice note 3, 'The Historic Environment and Site Allocations in Local Plans' sets out a staged approach: identify the assets, assess their contribution, assess the effects and consider avoidance and mitigation but this has not been followed.

13. The NPPF says that where development leads to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. But SPS8 has zero number of dwellings, so there is no quantified public benefits to balance, even if the dwellings were to be of public benefit.

Q4, 2nd para: 'What information is available to demonstrate that the site can be developed in a way that preserves or enhances the character or appearance of the Iffley Conservation Area and the setting of neighbouring listed buildings?'

14. There is no information available to demonstrate that the site can be developed in a way that preserves or enhances the character or appearance of the Iffley Conservation Area and the setting of neighbouring listed buildings. On the contrary, it is clear it is impossible, for the following reasons.

15. There are significant heritage constraints on the site.

16. It is impossible to enhance the site's character by development; it is rural and development would destroy that rural significance.

17. The Iffley conservation area appraisal states: 'to the south-west of the [Meadow] lane is one of the last important remaining open spaces within the village'. It notes Meadow Lane's predominantly rural quality, an important part of the setting with the fields to the west. Key features are 'remaining open green spaces', 'long views across the undeveloped fields out of the conservation area' and 'historic and characteristic stone walls'. Meadow Lane is an important part of the ICA and is a rural heritage asset, which would be harmed by development in the site.

18. Significant highway works would be required at construction and completion stages that would be in direct conflict with heritage significance. In 2011, the Council stated that access would be straight off a roundabout at Church Way and Meadow Lane was a private road and 'there could be difficulties providing an adequate sight line'. ('Preferred Options'.) The long historic stone wall at Church Way is prominent in views and a positive contributor. Access would require large areas of openings in this wall, a vulnerability noted in the conservation area

appraisal. Also, the listed red brick wall at Meadow Lane, a right angle in plan form, hampers visibility and would have to be realigned in part. Accidents have happened at this junction.

19. The character of conservation areas derives also from intangible qualities such as noise, disruption and smell. Meadow Lane, crucial to the setting of the conservation area, is a quiet route, much used by non-vehicle users predominantly; any development would increase noise, disruption and the perception of safety considerably and cause harm. (Intangible values form part of heritage significance as proved in Lewison LJ in R (Palmer) v Herefordshire Council, 2006.)

20. Having understood the significance, it is clear that development would cause substantial harm to the character and appearance of that part of the conservation area and its setting. It would cause less than substantial harm, at the higher end, to the character and appearance of the conservation area and its setting, taken as a whole.

21. Development would harm the intervisibility of views and the legibility and understanding of its historic settlement pattern be destroyed.

22. Development would destroy the site's historic development pattern and morphology. The open fields would be infilled and suburbanised and would be highly visible.

23. Development would destroy our ability to appreciate the historic landscape.

24. There would be a cumulative harm to the open spaces of the conservation area.

25. The intangible qualities of the site, the quiet, lack of traffic noise, the sound of wildlife, the verdant feel of escape from the city into a rural area, would be destroyed by traffic, new noises, loss of habitat and urbanisation of both the meadow and Meadow Lane.

26. In reality, there is no area available for development, due to the heritage views, Rose Hill View Cone, constraints of the conservation area, setting of listed buildings, and setting of non-designated heritage assets.

27. Turning to the setting of three listed buildings, Tudor Cottage, Townsend Close and the walls and piers to Townsend Close and also to Quince Cottage at 402

Meadow Lane (a ‘non-designated heritage asset’, a NDHA can be identified during the planning process): development would harm their inter-visibility and legibility with other assets and their significance.

28. Hedges and trees are an important characteristic of the conservation area. Meadow Lane would be harmed and partly cut down with the requirement for access, destroying the feeling of rural enclosure. Indeed, some of the hedge lines date to the 1830 Enclosure Act of Iffley or are older.

29. Given that development has taken place since the ICA was published and is now proposed that there would be ‘cumulative harm’ to the site, a rare survival. Harm has substantial weight and prevention is the first aim.

30. The council has rejected the site previously. In 2011, the Council stated: ‘Development on the site would have a detrimental effect on the conservation area, as well as difficulties in creating suitable access.’ It quoted the ICA appraisal: ‘one of the most important remaining open spaces within the village’ and ‘the rural nature’. ‘Development of the site would be harmful to the views and to the rural character and linear nature of the village.’ [Sites and Housing, Development Plan Document, Preferred Options, Consultation document, May 2011.]

31. It is not stated and it is unknown why the council has set aside its 2011 assessment or why significance is downplayed now.

32. The policy relies on the questionable assumption that because the site was allocated in the local plan 2036, that it was sufficient to carry it over to the next plan.

33. The 2014 Strategic Housing Land Availability Assessment (SHLAA) said: ‘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’.

34. The fact that the scale of development is unknown (zero units) shows that the impacts on the conservation area, the views and the setting of the listed buildings cannot be assessed.

35. The fact that Historic England did not comment - either way - on the site is of no concern because they tend to comment on more prominent sites and on grade II* and I listed buildings. Oxford Preservation Trust, experts on heritage, stated that the site allocation was unsound and should be removed.

36. Now that Ox Place (Oxford City Council's wholly-owned housing company) owns the site, it is possible that there is a conflict of interest between heritage constraints, local and national policy and land ownership.

    (Note: the NPPF quoted here is the 2024 version.)