EXAMINATION OF THE OXFORD LOCAL PLAN 2045

MATTER 5: SITE ALLOCATIONS

MORNING SESSION: 26 NOVEMBER 2026

HEARING STATEMENT ON BEHALF OF FRIENDS OF THE FIELDS, IFFLEY

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1. This Hearing Statement is filed on behalf of Friends of the Fields, Iffley ("**FOFI**").

2. FOFI is a community group concerned about the soundness of Policy SPS8 Land at Meadow Lane and requests that it be deleted.

Q1 What is the scale of residential development proposed by Policy SPS8 and how has it been established?

3. There is no quantum of development set out in the Policy. That omission alone is unsound. It is impossible to sensibly monitor the effectiveness of the Policy without an understanding of the role it is intended to play in the delivery of the spatial strategy. Moreover, it is impossible to test whether the policy would be effective.

4. It is however entirely unsurprising that the Council has not included a quantum in the Policy given the highly constrained nature of the site and the lack of coherent evidence to demonstrate <u>any</u> quantum of units could be satisfactorily accommodated on the site (i.e. in a manner compatible with other planning policies at national and local level).

5. The Site Capacity Assessment of 29 units is inconsistent with the zero allocation in the SPS8 Policy.[1] However, it is impossible to understand how the Council come to that view on the basis of the current evidence.

6. The SA[2] (presumably at a quantum of 29 units, given that it accords a double-plus for housing delivery) scores the site as negative and double-negative against the following sustainability objectives:

    a. Resilience to Climate Change (--) (on account of development in Flood Zones 2 and 3).
    b. Making efficient use of land (-) (on account of its greenfield status).
    c. Traffic and air pollution (-) (on account of its unsustainability).
    d. Achievement of water quality targets (-) (on account of potential water pollution).
    e. Conserve Oxford's biodiversity (-) (on account of the potential impact on SSSI, the site's clear qualification as of at least Oxford City Wildlife Site status, county importance for invertebrates, presence of valuable (including 'Priority') habitats and other protected species including reptiles, rare bats and badgers). We suggest that this clearly scores (--).
    f. To promote good urban design (-/--) (on account of the impact on listed buildings and the rural Iffley Conservation Area).
    g. It also identifies the significant constraint of protected trees.

7. No evidence is given how 29 units could be sustainably and viably delivered on the site.

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[1] CAP.032.
[2] CSD.004b SA Appendix C – Site Assessments @ p.90

Q2 What is the latest position regarding the proposals for the site?

8. A planning application was made on 16 December 2022 (22/03078/FUL) seeking permission for 32 units but remains undetermined due to unresolved objections from external consultees, including:

    a. **Environment Agency** (27 November 2024) – concerning flood risk and water quality. Although the EA have subsequently said that the allocation is sound in terms of flood risk, this would depend on pushing the development East which increases the heritage harm for views and setting of listed buildings.

    b. **Berkshire, Buckinghamshire and Oxford Wildlife Trust ("BBOWT")** (3 February 2023) – concerning (i) loss of on-site habitat; (ii) potential impact on the Iffley Meadows SSSI; (iii) lack of evidence on net gain, (iv) lack of evidence of on and off-site management and (v) loss of priority habitat (hedgerow). Objections were also received from Buglife (the national invertebrate conservation charity) and Plantlife. As a result the Trust for Oxfordshire's Environment has declined to accept BNG mitigation for this site.

    c. **Thames Valley Police** (19 January 2023) – potential for crime and disorder in the design.

9. The internal consultee responses have not been made public but, given the Applicant's own heritage and biodiversity assessments, it is clear it would not attract support from the Council's conservation team or ecologists.

10. The lack of progress with the application in the four years since submission tells against its deliverability, especially considering the site is an extant allocation. Indeed, the Applicant's own assessments underpinning the planning application appear to temper the weight to the significant harm they identify by proceeding on

the basis that was assumed at the allocation stage.[3] In reality, there was no adequate evidence to allocate the site in the 2036 Local Plan (as explained further below).

Q3 How have the effects of development on ecology and on the integrity of the Iffley Meadows SSSI been considered as part of the site allocation process? What information is available to demonstrate that criterion a) can be met?

11. There is no evidence Policy SPS8(a) could be met.

12. It is instructive that for Iffley Meadows SSSI, the Council has taken a very different approach to that which it has taken elsewhere in support of Policy SPE1(c) and the acknowledged implications of that allocation for another SSSI in the City – the Lye Valley SSSI. In that case, the Council has commissioned (and submitted to the Examination) a hydrogeological study[4], has mapped Impact Risk Zones on the policies map, and is preparing a Technical Advice Note. By contrast, not one but three allocations fall within the Iffley Meadows SSSI Impact Risk Zone (SPS3, SPS8 and SPS14). For these sites, the Council has not sought to demonstrate that criterion (a) can be complied with by reference to detailed technical work – choosing instead to leave the assessment of hydrological effects to the planning application stage of each site. Whilst Natural England has not objected to this approach, it evidently has unresolved concerns in 'welcoming' the requirement for a hydrological assessment and details of SuDS[5] for each of these three allocations. It is unclear whether NE have considered the matter cumulatively or for each site in isolation. It is difficult to understand why the Council did not see fit to assemble the necessary technical evidence that criterion (a) could be complied with and the policy, by extension, made

[3] See e.g. paragraph 4.30 Applicant's Built Heritage Report.
[4] GRE.018
[5] COM.009

sound. In any event, a policy criterion that defers the question cannot stand as evidence that criterion (a) can, or will, be met.

13. On the effects of development on ecology more generally, and the related matter of site capacity, the available evidence (including from the promoter itself) demonstrates that the policy is unworkable. The Council seeks to place weight on the site's previous allocation in the Oxford Local Plan 2036 (adopted in 2020) as determinative that the various and weighty ecology/biodiversity constraints can be overcome, but in fact the only evidence it provides to support the continued allocation of the site is that collected *after* the examination and adoption of LP2036.

14. This is because, when the site was first promoted for allocation as SP42 in the Oxford Local Plan 2036, the only ecological evidence was a single visit on 24 October 2017. On that date the surveyor viewed the site only from Church Way and Meadow Lane. They recorded that it "*could not be fully assessed*" and that "*parts of the site could not be seen*", and advised that further survey was likely to be needed. The Council decided not to commission that further survey, meaning no ecologist set foot on the site before it was allocated. The previous Inspector therefore had no adequate evidence on the site's ecology. The existing allocation can therefore carry no weight as evidence that the site is ecologically suitable for development.

15. In fact, surveys carried in 2021-22 and since for application 22/03078/FUL (and independently) form the basis for the Council's latter-day acknowledgement (e.g. in the Sustainability Appraisal) that the site is highly ecologically constrained. These constraints include:

    - The presence of semi-improved neutral grassland retaining indicators of unimproved conditions, which could be restored to Lowland Meadow priority habitat (consistent with LNRS objectives);

- an invertebrate assemblage that the applicant's own specialists assessed as of "County" importance. This includes a Red Data Book species, a Species of Principal Importance (S41 NERC Act) and a suite of nationally scarce species, nine of which have no other records in the City;

- a large, long-established main badger sett that depends on the open grassland fields for foraging;

- the presence of protected common lizard and grass snake, as well as other Species of Principal Importance amongst the breeding bird assemblage;

- foraging and commuting use by the nationally rare barbastelle and Nathusius' pipistrelle bats, amongst other more common bat species;

- transient use of the western boundary ditch by otter (at least in 2021).

On this (undisputed) evidence the site clearly qualifies as an Oxford City Wildlife Site under the relevant (and adopted) selection criteria. It arguably also meets the criteria for a county Local Wildlife Site. That it does not already bear such designation is only because no designation process has been applied to it: it is privately owned (by a subsidiary of the Council), has no public access, and had never been surveyed before 2021. The Council appear to treat this lack of designation as synonymous with a lack of value. That is an ecologically nonsensical approach.

16. The site is also contiguous with the Thames floodplain and Oriel Meadow and forms part of the city-wide green infrastructure network as recognised by the Policies map, the Council's Green Infrastructure Study, and the Local Nature Recovery Strategy.

It remains a standard principle that plans should allocate land with the least environmental value. The Council's own evidence confirms that the SPS8 site is of high environmental value. Yet the latest site capacity statement CAP.032 seeks to reduce the site's interest to "Badgers" and invertebrates found during the application work and includes errors such as an assumption that only the south-western corner is vulnerable to flooding. Under the heading "*extra work needed to inform allocation*" this document lists the "*conclusions of biodiversity work informing planning application*". It is notable that the Council told Natural England that its site capacity assessments record how biodiversity was weighed in setting minimum capacities[6]. For SPS8, the Council's own document shows that this weighing has not yet been done. And yet it proposes a minimum of 29 dwellings.

17. The capacity of this site for any housing is unevidenced. Beyond the ecological constraints discussed above, it is further reduced by:

    - Flood Zones 2 and 3 (see under Q6 below);
    - the Conservation Area setting and the listed wall (see under Q4 below);
    - protected trees;
    - the 10m watercourse buffer and the green infrastructure criterion now agreed with Natural England (COM.009);
    - the requirements of open space and space hungry SuDS; and
    - the challenges of the site's sloping topography.
    - access constraints and adverse impact on the bordering Principal Quiet Route for Active Travel.

18. None of these constraints is reflected in the CAP.032 capacity assumptions. A figure of 29 units is, frankly, fanciful.

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[6] COM.009, Table A.1, response on SPE3

Q4 Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned? 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?

19. As the SA notes, the site falls within the Iffley Conservation Area and the setting of three Grade II listed buildings (Tudor Cottage, Townsend Close and its associated Wall and Gate).

20. The law requires that considerable importance and weight should be attached to the desirability of (at least) preserving the character and appearance of conservation areas, by virtue of s.72 Planning (Listed Buildings and Conservation Areas) Act 1990.

21. The Applicant's Built Heritage Statement found that this statutory requirement would be breached and identified harm to the Conservation Area, because:

> "5.4 The undeveloped qualities of the site have been identified as forming a positive element of the Iffley Conservation Area and contribute to its character and appearance. The proposed development will introduce housing into the site which will result in the loss of its present undeveloped qualities and cause less than substantial harm to its significance."

22. A professional Heritage Statement commissioned by FoFI in response to the 2022 planning application identified significant harm to the Conservation Area, stating "the impact on landscape and the visual effects are considered to be significantly harmful and do not comply with the key requirements of Policy SP42 [SPS8] and the overarching guidance within the NPPF".

23. Significant harm was in consequence of the following:

> "Loss of important open green space, identified within the Conservation Area Appraisal as such and protected by policy in terms of heritage harm. The application site is two-thirds of the last remaining ancient meadowland in Iffley, land which has high levels of cultural heritage per the Landscape Value identified in Table 2 of the landscape response (Farmer, 2023).

> Loss of the only remaining visual remnant of the historic settlement boundary in the context of the wider landscape setting to the west.
>
> Loss of views of designated historic assets (Townsend Close and Tudor Cottage) in views from the wider landscape.
>
> Loss of the rural character of Meadow Lane, a historic drover's road. Individual harm to the settings and significance of designated and none-designated assets within the conservation area
>
> Cumulative loss of open green space in terms of previous losses to the conservation area since designation."

24. There is no evidence that the site could be developed in a manner which would preserve the character and appearance of the rural Conservation Area and contribute to the significance of the listed buildings. Indeed, the evidence (even from the promoter of the site itself), is that any loss of the undeveloped character of the fields would compromise the character and appearance of the Conservation Area. That would be the same for any quantum of units.

25. The previous Local Plan site allocations were clear that the site was unsuitable for development on heritage grounds, the following in 2014 and 2011 and a planning application in 1994:

> "Site (no 389) Land at Meadow Lane. 'Unlikely to be possible to develop without a significantly negative effect on the Conservation Area. This constraint remains" (2014 SHLAA)
>
> "Meadow Lane site (No 100) 'Development on the site would have a detrimental effect on the conservation area, as well as difficulties in creating a suitable access. The draft Iffley Conservation Area Appraisal describes this site as 'one of the important remaining open spaces within the village, a field once the village cricket and football field now grazed by animals, again reinforcing the rural nature of the settlement'.
>
> The Landscape Character Appraisal for Oxford (2002) notes the importance of the low-density development playing an important part in the character of the area. Development of the site would be harmful [to] views and to the rural

character and linear nature of the village. Potential access is off Meadow Lane and Church Way. Access would be straight onto a roundabout. Meadow Lane is a private road and there could also be difficulties providing an adequate sight line.' (Sites and Housing Development Plan Document Preferred Options Consultation Document May 2011 Appendix 4: site rejected before or at the Pre-Options consultation)

Planning application 1994: Refused on the basis that the site played an important role in expressing the rural character of Iffley.

26. There is no evidence or audit trail showing why the council allocated it for the first time.

27. The site has too many heritage constraints for it to be developed, including the Rose Hill View Cone, local views, the setting of the conservation area and of listed buildings. The site has significance as the last unbuilt on, rural, open space that is important in Iffley's rural history.

28. The council has failed to assess the total heritage significance of the site.

29. The proposals are in conflict with the Iffley Village Conservation Area Assessment, being a material consideration in the planning process.

30. There are significant highway challenges and sight-line constraints for vehicular access and a sharp, dangerous bend at Church Way/Meadow Lane. A resolution is not proposed, but it is clear that the listed brick walls at Townsend Close, and the stone walls at Church Way would have to be partially demolished to allow access, thus causing significant harm to heritage assets.

31. It must be emphasised that the site and Meadow Lane are rural and the site is an important part of the Conservation Area's setting. The site has important historic

links with the Thames, the drover's road and to ancient settlements at Rose Hill and Temple Cowley

32. The only rational conclusion is that the allocation would conflict with policy and would not contribute to a positive strategy for the conservation and enjoyment of the historic environment, contrary to paragraph 203 NPPF.

Q5 Can a safe and suitable access to the site be achieved for all users, consistent with paragraph 115 of the Framework?

33. The SA concludes that a safe access can be achieved from Church Way. However, a vehicular access from Church Way onto the site would require the total (or practically total) loss of a stone wall that is a positive contributor to the Iffley Conservation Area.

34. is currently the subject of an unresolved objection from the Highway Authority because:

> "Meadow Lane currently serves a number of properties which have parking for multiple vehicles, particularly at the north/western end of the lane. The accident data does not show any incidents within the last 5 years along Meadow Lane, it is therefore not considered that there is currently a safety risk with vehicles and pedestrians/cyclists sharing the space. However, there are obvious concerns with drastically increasing vehicle movements along Meadow Lane and the potential conflict that could cause. The development will not only generate vehicle movements but will also increase pedestrian and cycle movements further, so in order for the scheme to be considered acceptable, significant improvements to the public realm are required in order to make the route safe for all users."

35. What the Highways Authority fails to mention is that both Church Way and meadow Lane are part of the designated Quiet Route for Active Travel (OXR18) as part of Oxfordshire's local walking and cycling infrastructure plan (LCWIP). Active travel users vastly outnumber vehicle use. This is likely to explain the lack of reported incidents along Meadow Lane in the last 5 years. Instituting vehicle access on Meadow Lane would compromise the safety of vulnerable users of the route. In

addition proposed significant improvements to the public realm along this ancient, unmarked lane would urbanise the rural conservation area.

36. The Highway Authority maintained its objection and the requirement for off-site works to make the development acceptable. The design of those works has not been published and there is no evidence they would be deliverable and viable.

37. Despite the requirements of the NPPF, no evidence was presented by the applicant to the extant planning application that the scheme design development has been influenced by the major unique logistic issues and restrictions associated with the site's location. An expert report provided to FOFI concludes "Analysis shows that the Iffley road network cannot accommodate the volume [of] construction traffic associated with this development without creating unacceptable safety risks to the public."

Q6 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

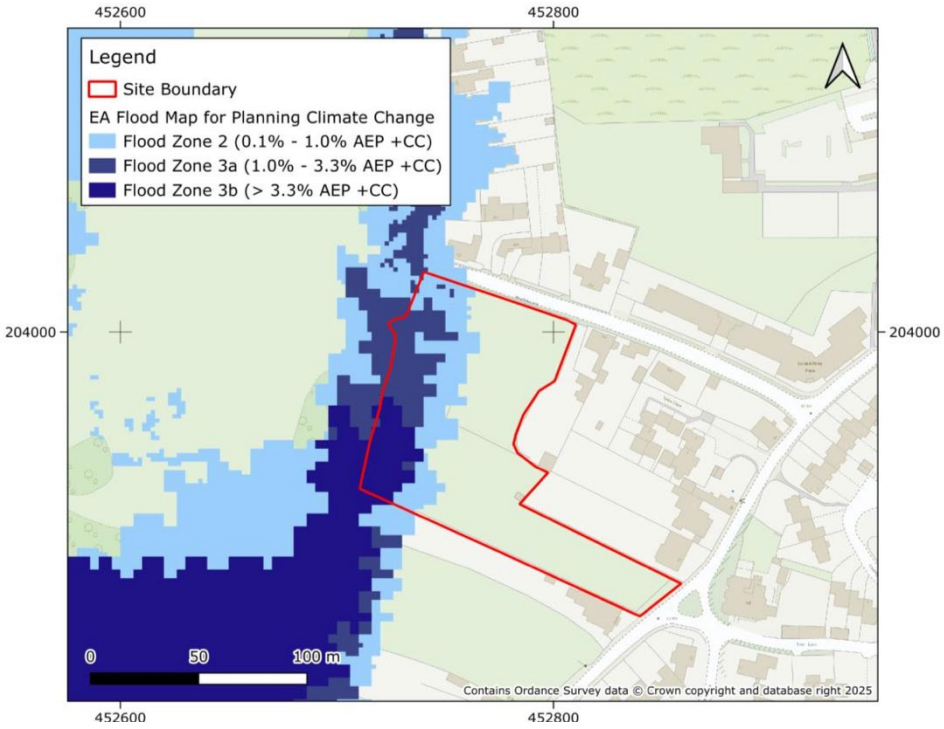
38. The site falls within Flood Zones 2 and 3. The EA objected to the FRA which had been undertaken (in its 1 March 2023 response) on the basis that it failed to take into account the impacts of climate change. The EA requested a further FRA be undertaken. A subsequent FRA was undertaken, upon which the EA were consulted and the EA maintained its objection (5 June 2024).

39. A SFRA was undertaken in support of the allocation.[7] That concluded that the development could avoid the extent of Flood Zone 3b (in a design event) however, it appears to accept that some development would then be located in Flood Zone 3a and 2, unless all the development could be accommodated in the far east of the site (in Flood Zone 1).

[7] GRE.016 (389).

40. However, avoiding Flood Zones 2 and 3 would bring development closer to the listed buildings, and make it by definition more prominent from within the village core of the Conservation Area. It would build across the rural landscape views that are a significant part of the setting of Iffley's rural Conservation area. It would also reduce the developable area and require out-of-character (and therefore harmful to Iffley's Conservation Area) density, heights and massing. The Council has not provided any evidence to demonstrate what (if any) quantum could be satisfactorily delivered on the site but the flood mapping compared to the site layout plan for the extant scheme shows the obvious implications:

Figure 4 - Fluvial Flood Map



GRE.016 SFRA (January 2026) Land at Meadow Lane (389) p.7.

41. Notably, the planning application did not bunch development in the east of the site:



Proposed Site Plan Ground Floor of the 32 unit scheme (17 December 2022)

42. There is no evidence a scheme could be satisfactorily delivered in the extreme east of the site (avoiding Flood Zones 2 and 3) whilst not giving rise to adverse heritage and townscape effects.

CONCLUSION

43. In consequence of the aggregate effect of the site's multiple constraints, and the absence of evidence that any housing can be sustainably and viably delivered, Policy SPS8 is unsound and therefore should be deleted.
44. We request a site visit.

RICHARD BUXTON SOLICITORS

FOR AND ON BEHALF OF

FRIENDS OF THE FIELDS, IFFLEY

10 November 2026.