EXAMINATION OF THE OXFORD LOCAL PLAN 2045

Stage 2 Hearing Statement

Matter 14 – The Natural Environment

Dominic Woodfield CEcol CEnv MCIEEM, Managing Director of Bioscan UK Limited (Respondent 56)

Hearing session: Tuesday 8 December 2026 (10am-1pm)

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1. Introduction

1.1 This statement is submitted by Dominic Woodfield CEcol CEnv MCIEEM, Managing Director of Bioscan UK Ltd, a leading ecological consultancy which undertakes ecological impact assessment and related work both in Oxford/Oxfordshire and nationwide. I made representations to the LP process both in an independent capacity (as Respondent 56) and also assisted with representations submitted by Friends of Iffley Village and Friends of the Fields, Iffley. This statement addresses the Natural Environment policies in the draft Local Plan (Matter 14: The Natural Environment) which are to be discussed in the Stage 2 hearing on Tuesday 8 December 2026.

1.2 My Regulation 19 representations (56.1 and 56.2) sought deletion of Policy SPS8 (Land at Meadow Lane, Iffley) and its re-zoning as an Oxford City Wildlife Site (OCWS) and critical green infrastructure. They argued that retaining the allocation puts the draft Plan at odds with its own environmental policies. That request also engages draft Policies G5 and G6 which seek to identify, protect and connect sites of biodiversity value.

1.3 I have not changed my position on these matters. In line with paragraph 20 of the Stage 2 Guidance Note, I answer only Issue 4 (Q2 and Q1) and, briefly, Issue 1. I do not repeat my earlier representations.

1.4 In summary, Policy G6 remains inconsistent with paragraph 187 of the NPPF[1] because the Plan's green infrastructure network is now less coherent and less protected than its mapping suggests. The SPS8 site - Land at Meadow Lane – exemplifies the internal conflict within the Plan that this creates.

[1] This and other NPPF references in this statement are references to the December 2024 NPPF, which the Inspectors have confirmed applies to this examination. For completeness, I note that the revised NPPF published on 17 August 2026 carries the relevant requirements forward in Chapter 19. For example, Policy N1(1)(a) requires plans to set out the hierarchy of locally designated sites, and N1(1)(b) to identify opportunities to create and strengthen ecological networks that are more resilient to current and future pressures. Policy N6(1)(c) protects local wildlife sites identified "in the development plan", which reinforces the need for the Plan itself to designate sites of OCWS quality (section 3). The new NPPF does not therefore alter the substance of the points made here.

2. Issue 4, Q2 – Is Policy G6 consistent with paragraph 187 of the Framework?

2.1 Paragraph 187(d) requires plans to establish coherent ecological networks that are more resilient to current and future pressures. Policy G6 cannot achieve that on its own: it depends on the green infrastructure network defined by Policy G1 and the Policies Map. Comparing the LP2036 and LP2045 Policies Maps suggest some obfuscation at work here which, when unpicked, reveals the policy protection afforded to the GI network to have been weakened since LP2036, not strengthened.

2.2 To illustrate this point, I have compared the LP2036 and LP2045 Policies Map layers in GIS. The mapped G1 area has increased quantitatively, but the increase is largely presentational and not qualitative. About two-thirds of the land added to G1 was already protected in LP2036, chiefly as Green Belt or as open space, allotments and sports provision. This means that there has been little or no meaningful expansion or consolidation of the GI network from the last Local Plan, despite the strengthened policy compunction and improved recognition of the importance of access to nature for wellbeing and economic prosperity.

2.3 In fact, some land fully protected under LP2036 Policy G1 has been demoted to a new "Supporting" tier (G1B) which has had its protection weakened. Loss of G1B land is suggested in the draft Plan to be acceptable subject to reprovision. A network whose components can be traded away in this way is not "more resilient"; it is less so.

2.4 The Council purchased the Land at Meadow Lane in the wake of a flawed allocation process in LP2036, and has since been unable to secure consent for an acceptable form of development there due to the emergence of the weighty constraints that process failed to recognise. It is therefore probably no accident that Land at Meadow Lane has been demoted to G1B. The SPS8 allocation is mapped as G1B Supporting (Private Open Space). This is despite the fact that it was purchased via public money and is owned *de facto* by a public body. It adjoins Oriel Meadow (which is, by contrast, privately owned), lies within the Iffley Meadows SSSI Impact Risk Zone and is mapped in the Oxfordshire Local Nature Recovery Strategy as having significant potential for delivery of key strategic nature objectives, including restorable Lowland Meadow. Natural England's Regulation 19 response (rep 90.11) describes it as an asset with likely high biodiversity value, particularly for invertebrates, that would strengthen the ecological network. The Site's high ecology value, importance to the Iffley Conservation Area and value as an asset even without unrestricted public access are not matters of any substantive dispute. None of these are consistent with a lower-grade of 'supporting' green infrastructure.

2.5 And as submitted, Policy SPS8 does not even refer to Policy G1 or require any reprovision concomitant with G1B. In this, the Policy stands as an inconsistent exception with other proposed allocations (for example SPS13, SPE4 and SPE18) which all reference the reprovision need. The Plan as submitted for examination was therefore internally inconsistent in applying its own network policy.

2.6 The Council now proposes to correct this, as reported in its Statement of Common Ground with Natural England (COM.009, May 2026). It proposes a modification to add an additional criterion, (h), which would state that, because the site is Supporting green infrastructure, enhancement of the remaining green infrastructure will be required to mitigate loss. I would like to make three points in response to this:

2.7 First, the change concedes and seeks to correct the inconsistency, but it was not consulted on and must proceed as a main modification. (As an aside the SoCG table also says the criterion is to be added to "Policy SPS3" which is an apparent drafting error that requires correction).

2.8 Second, it falls short of what Natural England asked for. Natural England cited the site's likely high biodiversity value, particularly for invertebrates (for which the Site has been classified by the landowner and promoter's own consultants as of County importance), and NE sought reprovision of any lost habitat on site first, before elsewhere in the network. Criterion (h) requires only enhancement of whatever green infrastructure remains. Enhancing a residual fragment cannot and does not replace the habitat lost, so the network would be denuded both in size and function. This is inconsistent with NPPF paragraph 187(d).

2.9 Third, Natural England's agreement that its comments were "not soundness issues" should be read in that light. It agreed a mitigation route for an allocation already proposed; it did not assess whether land protected under LP2036 Policy G1 should be reclassified as a lower 'Supporting' form of Green Infrastructure. The Council's SoCG response says Core (G1A) status was given where Nature Recovery Network core space formed a clear green corridor. The Council has nowhere explained why Land at Meadow Lane, adjoining and forming an extension of Oriel Meadow and close to Iffley Meadows SSSI, did not meet that test.

2.10 For G6 to be sound, the network it relies upon must be protected in substance, not just mapped and then disregarded. Land with demonstrable network value, especially land previously protected under LP2036 G1, should not be downgraded to the Supporting tier without site-specific evidence. G6 would also be strengthened by the commitment to protect priority habitats that Natural England suggested should be stitched in – a suggestion the Council has declined.

3. Issue 4, Q1 – Is Policy G5 justified, effective and based on robust, up-to-date evidence?

3.1 A policy protecting sites of local biodiversity value is self-evidently reliant upon and only as effective as the adequacy of the list of sites identified as such. Paragraph 192(a) of the Framework requires plans to identify, map and safeguard locally designated sites and the wider ecological networks that link them. That is a pro-active requirement, not one that can be disregarded when inconvenient or unwelcome, such as when an LPA owns a site. Again, Land at Meadow Lane provides an example of the selective approach to this duty that has been taken in this case.

3.2 A plain reading of Paragraph 192(a) of the NPPF is that where evidence shows that a site clearly meets the Oxford City Wildlife Site selection criteria, the Plan should designate it. It should not allocate the same land for development while leaving its status unresolved. In the case of Land at Meadow Lane, survey work carried out by the Council (and/or its subsidiaries) pursuant to planning application 22/03078/FUL, along with third party evidence (including Bioscan UK Ltd's 2023 ecological assessment submitted in response to that application, and undisputed), records grassland with floodplain meadow affinities and no sign of post-war agricultural improvement, mature hedgerows and trees, an active badger sett, a County important invertebrate assemblage and value for reptiles, bats and birds. As set out in my representation 56.2, the site is of at least City Wildlife Site (OCWS) quality when these facts are compared to the Council's own adopted selection criteria for such sites. Indeed, the Site arguably qualifies for the higher (County)-level Local Wildlife Site (LWS) designation.

3.4 The Council's own Plan text accepts that most of the site lies within Local Nature Recovery Strategy mapping, though as the SoCG with NE confirms this was not used to guide the formulation of draft Policy SPS8, rather the superseded TVERC Nature Recovery Network was. In any event, the Site was not assessed by the Council against the OCWS criteria. The Council have never explained why it has neglected to do this and why it has actively excluded the Site from such designation. That gap leaves G5 unable to do its job and rendered ineffective at the one place where it has been put to the test.

3.5 To make G5 effective, the Council should explain why sites with known evidence of OCWS quality have been passed over for designation, and specifically why Land at Meadow Lane has been excluded from that process. I also ask the Inspectors to note relevant planning history where sites clearly meeting designation criteria have been afforded such weight in planning decisions even where formal designation has not (yet) happened.

4. Issue 1, Q1 – Are the requirements of Policy G2 justified and effective?

4.1 I support G2's undeveloped watercourse buffer of at least 10m. Submitted Policy SPS8 refers only to retaining a buffer along the western watercourse; it does not specify a width consistent with G2. The Council's proposed change to criterion (g) adds a cross-reference to G2 (COM.009) but for clarity, the 10m minimum should be stated in any allocation Policy wording. This is no more than Natural England asked.

4.2 The watercourse in question is part of an historic floodplain drainage network draining to the Thames at Iffley Lock. It supports a ribbon of Priority wet woodland habitat, and is of high value as a wildlife corridor. With the mapped flood zones, 10m buffer, root protection areas of protected trees, badger sett and other factors all taken into account, the potentially developable area shrinks substantially and shifts eastwards towards the core of the Conservation Area and closer to listed building constraints. This is before access, SuDS and open space needs and the challenges of sloping topography are counted. G2, applied properly, cannot therefore be reconciled with the 29-dwelling capacity mooted in the Council's site capacity assessment. It is presumably recognition of this that led the Council to

word the policy differently and allocate no minimum quantum of residential units for this highly constrained site. These two positions are wholly incompatible and spotlight the lack of soundness in the allocation.

4.3 On Issue 3, I add only that the option of biodiversity net gain under Policy G4 cannot subvert the pre-eminence of the mitigation hierarchy. Reprovision of Supporting green infrastructure through off-site units cannot replicate an ancient floodplain-edge meadow within the city. And for the reasons above, the Council has provided no evidence as to how reprovision in other parts of the City's green infrastructure network would be achievable without net detriment to the network as a whole and a cycle of ever diminishing returns.

5. Changes sought and conclusion

5.1 To make Policies G5 and G6 sound, I ask the Inspectors to recommend the following main modifications (MM's).

MM no.	Policy	Main modification sought	Soundness test
1	G1 / G6 and Policies Map	Restore to the Core GI tier any land protected under LP2036 Policy G1 and since moved to G1B, unless site-specific evidence justifies the change	Consistent with national policy (NPPF 187(d)); justified
2	G5 and Policies Map	Designate Land at Meadow Lane as an Oxford City Wildlife Site and Core green infrastructure	Justified; consistent with national policy (NPPF 192(a))
3	SPS8	Delete the allocation, as sought in representations 56.1 and 56.2	Justified; effective

5.2 It will be evident to the Inspectors that deleting SPS8 has no effect on housing supply, because the policy states no minimum number of dwellings. On the other hand, it would remove an internal and irreconcilable conflict between the Plan's allocations and its natural environment policies.

5.3 Without these changes, the Plan would not meet paragraph 187(d) of the Framework.

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10th November 2026