

To: Council

Date: 13 July 2026

Report of: Director of Law, Governance and Strategy

Title of Report: Public addresses that relate to matters for decision – as submitted by the speakers and with written responses from Cabinet Members

Introduction

1. Addresses made by members of the public to the Council, and questions put to the Cabinet members or Leader, registered by the deadline in the Constitution, are below. Any written responses available are also below.
2. The text reproduces that sent in the speakers and represents the views of the speakers. This is not to be taken as statements by or on behalf of the Council

This report will be republished after the Council meeting as part of the minutes pack. This will list the full text of speeches delivered as submitted, summaries of speeches delivered which differ significantly from those submitted, and any further responses.

Addresses and questions to be taken in Part 1 of the agenda

1. Address from Martin Reed

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Today councillors have the opportunity to delete an unsound policy from the draft Local Plan 2045 and smooth the wheels to the Plan's adoption by heading off a key cause for argument at Public Examination. Requesting the removal of this unsound policy would render the whole plan sound (a statutory obligation) before its submission to the inspector.

Policy SPS8 is unsound

Land at Meadow Lane in Iffley is 2.5 acres of biodiverse meadow habitat which is an integral part of the rural Iffley Conservation Area. It has the worst sustainability score of any proposed allocation site in the plan and (in recognition of the site's problems) no minimum housing number.

The evidence for the unsoundness of Land at Meadow Lane is in your agenda packs. You should take into account the results of the Regulation 18 and Regulation 19 consultations which were not before you when Full Council met in January.

The absence of that essential public consultation material, and its relevance to your decision-making, was the reason Friends of the Fields Iffley took legal advice and was granted a Judicial Review and an injunction to prevent the submission of the Local Plan.

The Reg 18 consultation summary for the SPS8 site extends over 8 pages with many material objections including from Environment Agency, Oxford Preservation Trust, BBOWT, and Cyclox. Objections include:

3. Substantial harm to the rural Iffley Conservation Area
4. Biodiversity interest qualifying for Oxford City Wildlife Site status
5. Essential part of Core Green Infrastructure.
6. Poor access and harms to the adjacent Quiet Route for Active Travel

The Reg 19 consultation summary notes the absence of support for the allocation. Rather, a total of 45 responses found this policy to be unsound concluding that the policy is

- not positively prepared, justified or effective, and not compliant with national policies
- not compliant with the Council's policies on spatial strategy; green infrastructure, flood risk, heritage, housing and sustainability.

Two of the officers' responses are notable:

7. Responding to the lack of the requisite ecological assessment 'The horse prevented the surveyor from gaining full access to the site, so a best assessment was made from the edges'

This is symptomatic of the lackadaisical approach when originally allocating this site to Local Plan 2036. Whilst that was a past mistake, it is now being perpetuated in its flawed re-allocation. The Council now knows that the site has biodiversity interest of ample weight to protect it as Core Green Infrastructure. They also know that the Trust for Oxfordshire's Environment has declined to deliver off-site BNG due to its sensitivity.

8. In terms of the site's contribution to housing need the officer says that '*the site was assumed to have a capacity of more than 10 units*' but gives a curious justification for not putting 10 in the allocation, saying "*because it may be interpreted as saying that the number in [the current dormant planning] application is too high*". This justification would only be valid if 10 + houses was a maximum not a minimum. The actual reason appears much more straightforward – due to the site's constraints the site is unable to deliver even 10 homes in a policy compliant manner.

Dispelling 'myths'

Myth 1: The site is suitable for housing '*Because it was allocated to LP 2036*'¹

The Council's surveys since allocation to the Local Plan 2036 now show that its high sensitivity cannot deliver any minimum housing number. Re-allocation is at odds with the Council's processes to filter out unsustainable sites.

Myth 2 *'There is considered to be a potential scheme that responds appropriately to this setting'*

There is no evidence that a potential scheme can respond appropriately and the planning application has run into a brick wall for this reason. Even a small amount of housing around the edge of the site would lead to significant harm to the conservation area and biodiversity, for example by:

- Blocking the rural conservation area views accessible from the ancient lanes
- Removing ancient hedgerows and listed walls

Myth 3: Removing the site is not legal because there is a *'clear requirement that the Local Plan identify all viable housing sites to contribute towards meeting the housing need within the cities boundaries'*

There is no requirement to identify all viable housing sites either in law or policy. The requirement is to identify **sound** sites sufficient to meet the spatial strategy of the plan (e.g. enough housing sites in the right places to deliver the economic, social and environmental vision of the plan). Moreover, there is no evidence that SPS8 is viable given the constraints.

Myth 4: removing it would *'treat one specific site as an exception to the process used and that this inconsistency would undermine the plan'* [3](#)

On the contrary, removal of SPS8 would be consistent with processes that led to many other proposed sites being rejected due to heritage, biodiversity or no capacity for at least 10 homes.

In fact, it is very common, if not routine, for Councils to propose modifications to the inspector at this stage of the Plan making process.

Myth 5: *'The suitability argument is one that needs to be looked at by the Local Plan inspector at examination or determined as part of the planning application'* [5](#)

The decision on soundness cannot be delegated to the inspector or the planning committee. Elected members have a different role to the planning inspector by making decisions that reflect local circumstances and achieve balance to meet other needs in the city.

I hope that there will not be any additions to the mythology today!

Conclusion

For all these reasons I ask that members take this hard-won opportunity and vote for the only sound course of action, which is to remove SPS8 from the Local Plan 2045, and thereby send a Local Plan to Examination that is sound and ready for approval.

Response from Councillor Anna Railton, Deputy Leader, and Cabinet Member for Planning and Zero Carbon Oxford

Thank you very much Martin for coming to speak to us today.

I will attempt to run through point by point the substance of your address. Generally, about the process, councillors do not have the opportunity to delete an unsound policy from the plan; the publication version is the version that we must submit. Policy SPS8 is not considered unsound, but the inspector will have full access to the reg 19 representations and will make decisions about whether any changes are needed to the

plan to make it sound. That is very much their role. The weight of comments received does not render a policy unsound, and comments received out of reg 18 do not relate to soundness but are intended to shape the plan.

So, moving on to the housing quantum, the fact that there is now in the emerging local plan no housing number attached to this policy. So, no minimum is included in the policy to enable full flexibility in designing a scheme given the fully acknowledged sensitivities of the site. Policy allocations do not have to include minimum housing numbers, but most of them do to help ensure delivery of our assumed capacity. The capacity assessment, however, does make an assumption of 29 units, which is the minimum in the Oxford Local Plan 2036.

In response to myth one, it has never been suggested that the site is unsuitable for housing just because it was allocated in LP36. All sites have been reconsidered and reassessed a fresh as part of creating this emerging local plan.

Moving on to heritage, myth two. It is suggested that there is no evidence a scheme can respond appropriately to the heritage setting because any development would lead to significant harm, for example by blocking views from the ancient lanes and removing hedgerows and listed walls. It is suggested that the planning application has stalled for this reason. The current application is still under consideration; it has neither been withdrawn, nor determined. In any event, any application presents just one proposal for development that must be considered on its own merits and how it is determined will be relevant to that proposal, not the development potential of the site. It is reasonable to assume that sensitive design can retain key characteristics and that a scheme could bring benefits that outweigh any harms. The approach of the NPPF conservation area designations does not automatically prevent any new development, even on green spaces that are part of the setting. The allocation policy is written to note important characteristics and mitigations. This is informed by the initial testing through the capacity assessment process undertaken for all site allocations which indicated ways of responding appropriately to the site's sensitivities.

So, myth three covers housing pressure; this is not a matter of law, it is a matter of soundness that when a plan puts forward a housing requirement based on capacity, and which is lower than the identified need, then it must demonstrate every effort has been made to identify potential housing sites. It does not mean that unsuitable sites must be put forward for housing, but it does mean that identified suitable housing sites should be allocated for housing. There is no beauty contest for housing sites in Oxford, and the sustainability appraisal is not used to find which sites are best rated and should be taken forward. Even the lowest rated site will be taken forward if it seems that mitigation is likely to be possible for any identified issues.

So, the heritage constraints; there are occasionally but very rarely heritage constraints that would prevent a site being taken forward for a housing allocation and none in this round of plan making are rejected solely for this reason.

On the biodiversity point, designated sites are protected and therefore very rarely put forward to development and not investigated. This site is not designated although there is clearly biodiversity value. An ecological survey was carried out when the site was first allocated in the local plan 2036. This was a phase one habitat survey. The policy was clear that further detailed ecology ecological surveys would be required at application stage. These have been carried out to inform the mitigation that has not been ruled out.

Thank you.