

# South Oxfordshire Local Plan 2034

## Page 3: Part A - contact details

Q1. Are you responding as an:

Individual

## Page 4: Individual contact details

Q2. Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered:

Title	Mr
Full name	Peter Ewart
Business / Organisation name (if relevant)	-
Job title (if relevant)	-
Address line 1	██████████
Address line 2	██████████
Address line 3	-
Postal town	██████
Postcode	██████████
Telephone number	-
Email address	██

## Page 7: Part B - your comments

Q5. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph: STRAT12 NORTHFIELD

Q6. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?		X		
are sound?		X		
comply with the Duty to Co-operate?		X		

Q7. Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

1. No consultation has taken place with regard to the inclusion of Northfields Housing site within the Local Plan 2034. This area is designated as Site 05 Northfields in The Green Belt Assessment of strategic sites in South Oxfordshire (2018) This site is made up of a number of separate parcels of land all within the boundaries of the Green Belt Site. Parcel 05a; situated adjacent to Cuddesdon Road to the east of Horspath, through which a section of the Oxford Green Belt Way passes and being bounded by Hollow Brook. The assessment of the damage to the Green Belt that release of this plot would cause to the Green Belt as a whole is considered to be high. Parcel 5b being to the south of this, commencing at the western extremity of Site 05, behind Unipart 's offices & extending towards Garsington on both sides of Oxford Road. This parcel contains Northfield Farm itself plus the proposed Northfields Housing site. The damage to the Green Belt likely to result from its removal varies from that of a small area to the western boundary being assessed as likely to cause Moderate damage to the Green Belt, with the bulk of the area, to the north and east of parcel 5b, rated as likely to cause moderate - high damage to the Green belt should that area be released for development. The balance of this plot, still referred to as plot 5b extending towards Garsington village the rating of its loss, rises to that of being likely to cause high damage to the Green Belt if it were to be released.

2. The report commissioned by SODC headed; The Green Belt Assessment of strategic sites in South Oxfordshire (2018) Section 2 states the Study Context, the second part of this being under a sub heading National Planning Policy. Paragraph 2.2 of this section reminds us "The principle of maintaining a ring of open country around cities can be traced back to the 16th C when Elizabeth 1 forbade any building on new sites within 3 miles of the City gates of London. This was motivated by reason of Public Health to prevent the spread of plague & to ensure a constant supply of food for the Metropolis". What has changed? For plague insert air pollution. In the case of Oxford– namely Nitrous Oxide that can be easily traced to the boundary of the urban area with the Green Belt outside that area providing some relief. With the Government being under threat of legal challenge to rectify this; now is not the time to weaken the protective effects of the Green Belt. The question of the supply of food is also unchanged, since mediaeval times. With the danger now arising from the loss of productive farmland placing ever increasing demands on importing the food needed for our cities. This will become increasingly at risk with worldwide demand increasing plus the adverse effects of climate change to consider. Once again now is not the time to be reducing areas of productive agricultural land. The NPPF demands that particular attention be placed upon the sustainability of any proposed change in Green Belt boundaries. SODC's own report referred to above, commences by so clearly stating the founding principles for the establishment of the Green Belt, should have been more fully understood when the Local Plan 2034 was being drafted. The National Planning Framework; paragraph 136 provides that once established Green Belt boundaries should only be altered where exceptional circumstances are fully in evidence and justified. This has not happened. Paragraph 137 states that before concluding that exceptional circumstances the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need exist to justify its need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) Makes use as much as possible of suitable brownfield sites and underutilized land – it doesn't b) optimizes the density of development – it doesn't c) has been informed by discussions with neighbouring authorities – Certainly no evidence of this or any public consultation within the Local Plan 2034. Paragraph 138 states when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy making authorities should consider the consequences of sustainable development of channeling developments towards urban areas inside the Green Belt boundary towards towns and villages inset within the Green Belt – or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is will served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. There is no opportunity to make use of the neighbouring railway and little chance of enhancing bus services to the level that would be needed. Attention should be given to securing the future integrity of the Green Belt boundary that extends to what is referred to as parcel 5a that extends to Cuddesdon Road and includes the Oxford Green Belt way and extends past Hollow Brook. This also applies to the parts of parcel 5b area closer to Garsington where the harm rating would be high, all these parcels being designated Northfield development, should be stated as being excluded from the Local Plan 2034. Careful consideration should also be given to SODC's Landscape Consultant's report specifically noting that consideration must be given before any thought of reducing the Green Belt at what is described as a "fragile point", between Northfield development and the village of Garsington.

3. The National Planning Proposal essentially precludes the removal of land from the Green Belt and its replacement by housing development on prime agricultural land. Land whose loss would by its nature be an unsustainable development. What is more sustainable than the production of the

constant supply of food needed for our cities?

4. The founding principles of the policy set out so clearly in SODC's report Green Belt Assessment of Strategic Sites, ignores the sustainability of the health risk arising from the air pollution we are suffering now and will continue to suffer. Thus any loss of Green Belt must be considered an unsustainable development and precluded by the NPPF policy.

5. The Strategic Flood Risk Assessment dated Nov 18 produced for SODC states in paragraph 6.1 indicates; flood risk screening - "Northfield has the highest proportion of the site at risk of flooding from rivers" Northfield Brook that forms the Northern Boundary of the proposed development receives the surface water discharged both from Horspath and much of Shotover. This is resulting in much more frequent flooding inundating much of the land adjacent to the brook, it is evident we are increasingly suffering short burst of very heavy rain, possibly as a result of climate change. Thus the designated area is a flood plain unsuited for use as Northfields housing site. The Northfield housing development would also put the lower areas of Horspath, already at risk of flooding, at more risk of increasingly damaging inundation both by way of flood depth and frequency

6. The building of Northfield housing site on land designated as Green Belt is in conflict with SODC's own policy STRAT6 ; Green Belt

7. The decision by SODC to voluntarily provide more houses than that needed in South Oxfordshire cannot constitute an "exceptional circumstance" for justifying the removal of the Northfield housing site from the Green Belt.

8. The proposal to build 1800 houses on the Northfield housing site would add an intolerable burden of traffic on already overloaded local roads. Network Rail have no plans to increase the track capacity that would enable the existing branch line that serves the Mini Plant to be upgraded to allow its use for a link to any of the proposed housing sites to be built in the Green Belt. It is evident that should any proposal to extend and or increase the capacity of Grenoble Road through this area their remains nowhere for any increase in commuter traffic to go.

9. The parcel 5a area adjacent to Hollow Brook, should Northfield Housing development ever be allowed to approach that area; would be within an area subject to high levels of non-ionizing radiation. This extends much further than the potential swing of the cables and arises from the high or may be the extremely high voltage power lines carried on the pylons traversing this area, running towards Wheatley, it is these extremely high voltages that ionizes the surrounded air. The effects of these very high-energy fields on the human body, was the subject of great concern in the late 1980's and I am sure must remains so to some degree. Within the Greater London area; great care and cost has been incurred to ensure the very high voltage cables now crossing London have been laid in recently constructed tunnels. I know from my personal involvement at the commencement of these works, some years ago now, that their was particular concern with regard to the effect of these very high energy fields may have on heart pacemakers, at that time. There was no likelihood of prolonged contact where I was involved & no evidence of excess risk for healthy adults who worked within such energy fields. In addition to the factors considered at that time, the location where these initial works took place we, should now be concerned with the unexplained high incidence of children suffering brain cancer, that I understand is now of some concern. SODC could be considered negligent in allowing housing development to be constructed anywhere near these high-energy fields exist should evidence be found. These fields are of a different order of magnitude greater than that of any mobile phone signal, a power sufficient to excite neon tubes when held in the hand under the certain conditions, must give cause for concern with regard to the development of a child's brain and the likely duration of a child's exposure. Thus this area would not be sustainable for any domestic use and no loss of Green Belt should ever be sanctioned.

10. It is all to easy to forget in these days when the air within cities is becoming increasingly toxic that the Green Belt's origins started with the idea of providing a green lung for residents. The benefit of this can be experienced by all the many users of the much loved and very well used, Oxford's Green Belt Way. Part of this 50 mile long distance path around Oxford traverses parcel 5a. This may be considered to be the "ring way" that links the many local and well-used footpaths and Rights of Way within the Green Belt as a whole. In this way the Oxford Green Belt continues to give relief to both old and young and provides a most sustainable use of an asset that was created very much in accord with the founding principles upon which the Green Belt was based. This should also be considered to provide a significant saving to the NHS by maintaining the health of the many members of the public plus the more vulnerable groups who make full use of the Green Belt. This saving is probably incalculable, but what should be considered is that any reduction in the area of Green Belt is clearly in breach of para 138 of the NPPF.

Q8. Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

I would state that the Northfields housing site should be completely removed from the local plan 2034. The provision of housing stock for the City of Oxford on Green Belt land is wrong and is not a sustainable solution. A sustainable solution for Oxford City would be for them to seek to rectify the errors and unsustainability of earlier housing developments and to rein in the University's continuous expansion of student numbers that may well have created the problem they have.

My solution to the provision of the proven housing need is detailed as follows.

I qualified in Building in the 1960's so have first hand experience of the housing stock built in that period and I can say just how unsustainable house building of that era was. This was the period the Government brags that many hundreds of thousand houses were built. They do this without admitting to themselves or giving any consideration of just how badly designed and built that they were. This was both with regard to the houses themselves and the totally unsustainable amount of land used to create, what I would hope, we would now consider to be quite unsuitable road layouts that only encourage antisocial behaviour. After 60 years and certainly by the time of the expiry of the Local Plan 2034, these houses will be at the end of their lives. We have a new generation of architects and engineers who are well capable of developing the schemes necessary to phase in the replacement homes of the sustainable standard required now and to build at a greatly improved density at the human scale needed to give a much better living environment. Given the ability of the generation of engineers and architects we could achieve a 21st C modular construction that would be energy efficient, good to live in and of the ascetic quality needed. The additional homes provided plus the carbon savings achieved would be more economical solution than taking the "easy" way out and just repeating the mistakes of the 1960's.

This new generation could also be trusted to produce blocks of apartments that would look good inside and out, whilst supplying the energy efficiency and good living conditions needed. We do not need to repeat the mistakes of unsuitable forms of prefabricated multi storey construction, or the inflammability we have so sadly recently seen that the failure of the building industry has given us to date.

Q10. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q11. Would you like to comment on another policy or paragraph?

No

## Page 106: Future contact preferences

Q354. As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es) below:

I would like to be added to the database to receive planning policy updates for South Oxfordshire