

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	Mrs
Full name	Tracy Fletcher
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: SODC Planning about the Local Plan 2034 -- STRAT 12 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.

I do not consider the Local Plan to be legally compliant or sound, specifically with reference to STRAT 12 Northfield, because I was not consulted about the inclusion of the housing site at any earlier stage of the development of the Local Plan. In other words, there has been no meaningful or adequate public consultation provided by SODC to test the acceptability of its major change in strategy to promote the Northfield housing site in the Green Belt.

Inclusion of Northfield housing site in the Local Plan is unsound in that it is not justified, effective or consistent with national policy. National planning policy requires Councils to release Green Belt for needed housing only after all other options have been explored and if no other land is available on which need could be met. In the case of STRAT 12 Northfield, there are no "exceptional circumstances" for removing the Northfield site from the Green Belt.

SODC's decision to voluntarily provide more houses than the total needed in South Oxfordshire, as calculated by the Objectively Assessed Need process, does not constitute an "exceptional circumstance" that would justify legally removing the Northfield site from the Green Belt. The actual unmet housing need in Oxford City will remain unsubstantiated until the Oxford City Local Plan 2036 has been examined, but regardless of the outcome of that process, the most sustainable solution for meeting Oxford's housing needs is to build within the City itself. If there is no evidence of additional housing need, there can be no necessity for building in the Green Belt.

Finally, the Green Belt Assessment of Strategic Sites in South Oxfordshire (2018), which was commissioned by the SODC and drafted by LUC, states that removing the Northfield site from the Green Belt would lead to moderate-to-high levels of harm.

In addition, building the Northfield housing site on Green Belt land conflicts with the SODC's Policy STRAT6: Green Belt, which is also part of the Local Plan, and with paragraphs 133–137 of the National Planning Policy Framework. SODC has not provided the public with a current sustainability appraisal or habitats regulations assessment for the Northfield housing site. However, it is already known that large areas of the site are prone to frequent flooding, making it unsuitable for housing. The site is biodiverse and an important natural amenity in the region. The proposed 1800 homes that would comprise the Northfield estate would cause irreversible damage, which would be demonstrated by updated sustainability and habitats appraisals. Furthermore, the traffic in and around the village, especially between the ring road and Horspath, is already congested. Proposals for a Cowley branch line passenger rail service from a station near Blackbird Leys has been largely quashed by the reports that the main line between Kennington Junction and Oxford station is at full capacity. The residents of proposed housing at Northfield would thus have to rely on road transport (buses and cars), which would compound the already congested roads and lead to further pollution and deterioration of quality of life in the Horspath

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.

With reference to STRAT 12 Northfield, the allocation for Oxford's 'unmet need' as a justification for building the Northfield site, should be removed from the Plan and re-assessed when Oxford City has developed and agreed its own plan.

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