

Ms Wendy L Knerr



Mr Adrian Duffield
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RE: Individual Response to SODC Planning about the Local Plan 2034

Dear Mr Duffield,

I'm writing to strongly oppose the inclusion of Northfield housing site (STRAT 12 Northfield) in the SODC Local Plan 2034.

With reference to STRAT 12 Northfield, despite being a resident of Horspath, I was not consulted about the inclusion of the housing site at any earlier stage of the development of Local Plan 2034. 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 related to the Northfield housing site. This is evidenced by the South Oxfordshire Local Plan Update, January 2019, which clearly states that the inclusion of Northfield in the Local Plan was a change to the plan agreed by the South Oxfordshire District Councillors on 20 December 2018 — that has left local residents with a mere six weeks to “meaningfully” comment on a proposal that will dramatically and irrevocably affect the environment and living conditions of our village and the Green Belt. Thus SODC has violated its own Statement of Community Involvement, which was intended to enable “people to feel that they can make a real difference to the future of the areas in which they live and work” and to ensure meaningful participation, and specifically the principle of “early involvement” (p. 3 of the Statement).

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. As recently as January 2019, SODC stated on page 4 of its South Oxfordshire Local Plan Update that the Green Belt “will be protected from harmful development. Development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated”. And yet the next page of that same Update announces plans to build houses on Green Belt sites, including Northfield. By proposing this development, the SODC is contradicting itself and out of compliance with its own policies and statements.

Moreover, 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. SODC has said that by building

Northfield in the Green Belt, it is accommodating some of Oxford City's claimed need for unmet housing. Yet the actual unmet housing need in Oxford City is unsubstantiated and will remain so until the Oxford City Local Plan 2036 has been appraised. Regardless of the outcome of that appraisal, the most sustainable solution for meeting Oxford's housing needs is to build within the City itself, for example, through higher density building and devoting more of the land intended for business development to housing. Overall, building Northfield demonstrates SODC's unjustified prioritisation of Oxford City's needs over the needs and desires of those of us living in the District. The actual need for housing in South Oxfordshire will be met based on the figures already in the 2026 Local Plan. Clearly, 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. It states, in relation to Northfield (p. 51): "The parcel plays a significant role in protecting against urban sprawl by preventing the coalescence of Oxford and Horspath."

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.

I have not been able to find a current habitats regulations assessment for the Northfield housing site that considers local and national regulations (only the assessment related to EU regulations, which may be irrelevant after the end of March). Has a recent assessment of local and national habitats regulations been undertaken since the decision was made to include Northfield as a site for housing? Large portions of the Northfield site are frequently flooded with surface water, making it unsuitable for housing, especially as climate change is predicted to increase episodes of extremely heavy rain in this part of the country in the coming years.

In addition to the specific conflicts with existing policies and legislation, the Northfield site comprises biodiverse habitats and offers the open and beautiful views that motivated many residents of the local villages, including me and my family, to move here from Oxford City. I left an area of dense housing to move to a rural village, with open views and green spaces for walking. I walk virtually every day of the year, in all weather, enjoying the natural amenities that are an essential part of living in Horspath. The proposed Northfield estate of 1,800 homes would inevitably increase noise, air pollution, and light pollution at night, not to mention destroying the green buffer between Horspath village and the City of Oxford. It would destroy the village as we know it by making us a suburb of Cowley, with increased traffic and congestion and a significantly diminished quality of life.

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 village and the surrounding areas.

I urge SODC to completely remove the Northfield site from the Local Plan 2034.

I would like to participate in the oral hearings part of the legal Examination in Public in the summer, and be added to the database for receiving further information about the Local Plan 2034. I also request a response from SODC to ensure it has received my comments.

Sincerely,



Wendy Knerr