



**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address
(where relevant)

2. Agent's Details (if applicable)

Mr

Stephen

Pickles

Senior Planner

West Waddy ADP

The Malthouse

60 East St Helen St

Abingdon

OX14 5EB

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Oxford Brookes University's Harcourt Hill Campus is located in the Green Belt and earlier this year the University made representations on the Vale of White Horse Local Plan Consultation (February 2014) seeking the removal of the University's Harcourt Hill Campus from the Green Belt. This was on the grounds that the Green Belt review had identified land south of Lime Road, which consists of playing fields and other greenfield land as land which could be removed from the Green Belt. It was pointed

out that the University's Harcourt Hill campus is previously developed land and does not therefore perform any of the five purposes of including land in the Green Belt.

In response to the University's representations seeking the removal of the Harcourt Hill Campus from the Green Belt paragraph 56 of the Council's 'Consultation Statement' (October 2014) states that:

'A comment was received seeking to remove the site from the Green Belt, however, this has not been supported by our Green Belt review and also includes land that forms part of protected views of Oxford City.'

In response the Vale of White Horse 'Green Belt Review: Phase 2 Report' (February 2014) makes no reference to the Harcourt Hill Campus. All of its comments on area 'P4: Boars Hill North', which is the area that includes the Campus, relate to open land and are therefore not applicable to the built up area of the Campus. With regard to the protected views of Oxford, none of the ten views identified in the 'Oxford Local Plan 2001 – 2016', which include 3 in the Vale of White Horse District Council area include views of Oxford City from the Harcourt Campus or land further west in which it would be prominent. The recent 'Assessment of the Oxford View Cones,' (March 2014) does not make reference to the Harcourt Hill Campus and neither does it appear in any of the panoramas showing the ten views with annotations. It is acknowledged that the front of the Campus is in a prominent location overlooking the city, but the area further back is in a less sensitive location on the plateau. The adjoining residential areas are also located on the sensitive slopes and ridge line facing Oxford, so if this in itself justified Green Belt designation they should also be included. The Council also already has 'saved' Local plan policy NE8, which relates to the protection of the landscape setting of Oxford, so there is no need to designate the Harcourt Hill Campus for this purpose.

The fundamental objection to Green Belt designation is that it is inconsistent with the *'fundamental aim of Green Belt policy,'* which *'is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'* (NPPF, para 79) The designation of a relatively densely developed University Campus, which is adjoined both to the north and south east by existing residential development cannot therefore be consistent with this fundamental aim. The continued designation of the Harcourt hill Campus is therefore inconsistent with national policy and is therefore unsound. If it merits designation so do the adjoining residential areas either side to which the same considerations apply.

While it is acknowledged that sometimes developed sites are found in the middle of the Green Belt and therefore the designation washes over them, this does not apply here where the site forms part of the suburban area of Botley.

It would be inappropriate to undertake the review of the Green Belt at the Harcourt hill Campus in preparing part 2 of the Local Plan as Core Policy 9 relating to the Harcourt Hill Campus makes explicit reference to its location in the Green Belt.

If further development is needed to meet the aspiration of policy CP30 to take advantage of the opportunities likely to arise in the future, by the extension or more intensive use of existing education facilities, it is essential that the Harcourt Hill Campus is removed from the Green Belt.

(continue on a separate sheet/expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Exclude the built up part of the Harcourt Hill Campus from the Oxford Green Belt because it does not merit designation as it is not open land and to enable future extension or more intensive use of the Campus in compliance with policy CP30 (i), which will not be deliverable without this change.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The designation of the Harcourt Hill Campus as Green Belt is a significant constraint on providing good quality educational facilities and so the University wishes to explain why its designation as Green Belt is unsound to the examination,.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

19.12.14

