

HARCOURT HILL ESTATE RESIDENTS ASSOCIATION

Hearing Statement

Respondent reference 728951

EXAMINATION INTO THE VALE OF WHITE HORSE LOCAL PLAN 2031 PART 1: Stage 2, Matter 5: Proposed Revision of Green Belt Boundaries (including CP13)

January 2016

Introduction

This statement is submitted to the Examination into the Vale of White Horse District Local Plan 2011-2031: Part 1 on behalf of the Harcourt Hill Estate Residents Association.

This statement responds to the questions raised by the Inspector in his Matters and Questions relating to Matter 5.

Question 5.1 Do the exceptional circumstances, as required by the NPPF (paragraphs 79-86), exist to justify the plan's proposed revision of the boundaries of the Green Belt, having particular regard to:

- (a) Housing Allocation sites 1, 2, 3 and 4?
- (b) The land between sites 1 and 2, to the east of the A34?
- (c) The land to be removed from the Green Belt but not allocated for any particular use?

- (a) No comments
- (b) No comments
- (c) We do not agree that there are exceptional circumstances to justify the removal from the Green Belt of land south of Lime Road and north of the Harcourt Hill campus, identified as parcel C in the Vale's Summary Note (document HEAR03) submitted at the Inspector's request following the Stage 1 hearings on 22 and 23 September 2015.

The "exceptional circumstances" put forward to justify removal of these areas from the Green Belt are set out in para 5.1.5 of the Vale's submission dated August 2015 (document PC2A) in response to the Inspector's letter dated 22 June 2015. Those circumstances are:

- the need to meet the objectively assessed housing need in full within the District,
- the ability to release land presently designated as Green Belt with no harm to the purposes of the Green Belt, and
- The need to deliver sustainable development, through sustainable patterns of growth supported by the necessary infrastructure.

The first circumstance cannot be relevant to these sites. It would be relevant if the sites were to

be allocated to housing and it was shown that the objectively assessed housing need could only be met by releasing Green Belt land, but neither applies to land not allocated for any particular purpose. The NPPF (para 85) makes clear that “safeguarded” land is not allocated for development at the present time, and planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development.

As far as the Lime Road site is concerned, the second circumstance is questionable. The Vale’s Green Belt Review, Final Phase 2 Report (document NAT02) published in February 2014, merely refers to the site as *“An area which is better contained by the existing settlement, which is less a part of the wider countryside and which does not have the special qualities of the Green Belt are identified on the above plan.”* The basis for that view is not stated, and is open to question. The site is adjoined by existing settlement only at its northeast corner, and by a school at its western end, and can hardly be described as “contained” by existing settlement. The area is well used both by local residents accessing the countryside towards Cumnor Hurst by a public footpath, and by students crossing the playing fields to reach the adjacent playing fields on the Harcourt Hill campus of Brookes University, and both groups would regard the area as part of the “wider countryside”. The area also has extensive views towards Wytham and Oxford.

The loss of the site from the Green Belt would harm the purposes of the Green Belt:

- It safeguards the countryside around Botley from further encroachment (NPPF para 80)
- the Vale’s Green Belt Review, Phase 3 Report (document NAT03) published in November 2014, says of this site (identified as “Area 8”): *“Area 8 includes a prominent wood south of the school and good hedgerows which contribute to the wider Green Belt and should be retained as part of the Green Infrastructure..... Areas of rough pasture and scrub in Area 8 should be assessed for their landscape and ecological value.”*
- much of the site consists of playing fields, also used for informal public recreation, which are beneficial uses of Green Belts identified in the NPPF (para 81)

The third circumstance is not exceptional. The presumption in favour of sustainable development lies at the heart of the NPPF. The NPPF makes it very clear that protection of the Green Belt is an intrinsic part of achieving sustainable development.

Question 5.2

No comments

Question 5.3: Does the plan adequately identify the revisions to the Green Belt boundary that it proposes?

No. The text of the plan does not identify the proposed revisions to the Green Belt, except for the four sites identified as strategic housing allocations discussed in para 5.42. In particular, para 5.40 does not identify other revisions. It merely says “The Green Belt within the Vale of White Horse District is shown by the Adopted Policies Map”. Revisions to the

Green Belt can only be identified by close scrutiny of the Abingdon and Oxford sub area map (Document DLP01d).

In the Vale's submission dated August 2015 (document PC2A) in response to the Inspector's letter dated 22 June 2015, the Vale discusses the four sites identified for strategic housing allocation, but does not seek to explain or justify the removal of land from the Green Belt which is not allocated for a particular purpose, other than by reference to the Vale's Green Belt Review, Final Phase 2 Report (document NAT02) published in February 2014, and Phase 3 Report (document NAT03) published in November 2014.

Question 5.4: Is policy CP13 soundly based?

Our particular concern is the suggestion by one respondent (Oxford Brookes University) that the boundary be revised to exclude the Harcourt Hill campus of Brookes University.

The reasons put forward for excluding the campus are:

1. It is inconsistent with NPPF, para 79, that the '*fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*'
2. The February 2014 Green Belt review 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. That land adjoins the campus on its north side.
3. "If it merits designation, so do the adjoining residential areas, to which the same considerations apply."
4. "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."

We believe that these reasons are fundamentally misconceived. The campus is essentially open in nature, with widely spaced buildings interspersed with greenery and trees. It also contributes to the openness of the adjoining undeveloped land. It is typical of educational establishments commonly located in Green Belts. It is for that reason that the Green Belt included the campus when it was first designated, and the campus has remained in the Green Belt ever since.

The February 2014 Local Green Belt Review described the area as "Open land in the wooded estatelands and farmland which extend over the hills including Hurst Hill, Cumnor Hill and Harcourt Hill." The Review noted that "The area around Harcourt Hill is particularly vulnerable where the open hillside falls north-east overlooking Oxford" (page 32).

The land south of Lime Road is proposed for release from the Green Belt but not for allocation for any particular purpose. The University does not state whether it is in favour of the release of that land from the Green Belt, or provide any reasons for its release from the Green Belt. Our comments objecting to the release of that land from the Green Belt are set out in our response to Question 5.1 above.

The reference to “adjoining residential areas” is primarily to the Harcourt Hill Estate. The estate is a distinct area of low density housing (some 50 or 60 dwellings), which shares characteristics with areas such as Boars Hill which are “washed over” by the Green Belt designation. However the estate has always been an inset to the Green Belt which otherwise extends to the A34, and is not comparable to the open character of the campus. The distinctive character of the estate is managed by other development policies, in accordance with para 86 of the NPPF.

The campus is distinct from, and not part of, the “suburban area of Botley”. In fact the Green Belt serves an important function in separating the suburban area from the semi-rural Harcourt Hill Estate. If the campus was removed from the Green Belt, it would leave the area between the campus and the A34, including important views of Oxford, as an isolated fragment of the Green Belt, which would not be sustainable.

We submit that there are no exceptional circumstances justifying the exclusion of the Harcourt Hill campus from the Green Belt, and that in this respect policy CP13 is soundly based.

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