

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 8: Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area (CP8 – CP11 and CP14)

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 8.

Questions 8.1, 8.2 and 8.3

No comments

Question 8.4: Are the policies relating to the following matters soundly based:

(a) Harcourt Hill Campus (CP9)...?

We agree with the Council that Policy CP9 is soundly based.

We note the comments of one respondent (Oxford Brookes University), objecting to Policy CP9 on the following grounds:

1. Policy CP9 contradicts Core Policy 30 on Further and Higher Education creating a contradiction in the Local Plan
2. Policy CP9 is inconsistent with the NPPF as it would impose excessive restrictions on the University's ability to develop the Harcourt Hill Campus to provide modern and up to date educational facilities.

We believe that these objections are misplaced.

Objection 1

There is no inconsistency between CP30 and CP9. Policy CP30 correctly makes the rather obvious point that "The most appropriate locations for further and higher education provision are: i. by the extension or [our emphasis] more intensive use of existing education or other suitable community facilities." Para 89 of the NPPF, followed by CP13, sets out

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exceptions where the construction of new buildings may be appropriate in the Green Belt. These exceptions include:

- *“the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”*

There is no reason why Harcourt Hill campus cannot be improved and updated in a manner consistent with CP9, CP13 and the NPPF. Indeed, it has already been improved and updated in recent years, when outdated mid-20th century buildings have been replaced by larger, new and improved buildings, all compliant with Green Belt policies.

The University has to accommodate its development plans within the circumstances of the sites which it controls. In the case of the Harcourt Hill campus, these circumstances include the site’s location in the Green Belt, as well as other considerations such as the capacity of the local road network. It is also implicit in CP30 that Oxford Brookes University has the flexibility to improve and update its other sites, where different planning considerations may apply.

Objection 2

The University’s specific objection is that the requirement in CP9 that a site-wide masterplan “should be prepared to a standard suitable for submission as an outline planning application” is excessive.

CP9 goes into some detail to set out what the requirement means in practice, and is entirely consistent with the intention set out in para 5.20 that the masterplan should “ensure that the campus evolves in a coherent and comprehensive manner to provide improved educational facilities, including student accommodation and academic buildings.”

CP9 implies (although does not make explicit) that the masterplan is to be a Supplementary Planning Document to be formally adopted by the Council.

There is no inconsistency between the 2012 SPD regulations cited by the University and the guidance in CP9 as to the areas to be covered by the masterplan. It would be unhelpful for the SPD to omit key considerations, because such an omission could result in expensive and potentially abortive work in preparing subsequent planning applications if those considerations were not addressed until then. Contrary to the University’s assertions the guidance set out in CP9 entirely complies with the advice in paragraph 153 of the NPPF which states that: *‘Supplementary Planning Documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used*

to add unnecessarily to the financial burdens on development.' Similarly it is consistent with paragraph 21 of the NPPF, which states that *'investment in business should not be over-burdened by the combined requirements of planning policy expectations.'*

The extended period of time over which the campus will be improved, and the number of planning applications involved, underscores the importance of a masterplan to set out a vision and framework. That is what CP9 does.

The site raises questions of the scale and type of development, the balance of on-site residential accommodation vs. daily commuting, commuting between Brookes sites, and the resultant traffic management issues affecting the A34 and nearby residential streets. These are all issues which are best addressed before planning applications for individual projects are prepared, and that is what CP9 requires. A Transport Assessment will be particularly important, and the Vale has confirmed its view (in document PSD01b) that that is what CP9(iii), taken with para 5.21, requires.

The objection to the requirement for *'a comprehensive landscape, tree and planting strategy'* is misplaced. A comprehensive strategy is very different from detailed proposals. Landscaping and tree planting is a long-term business, and requires the overall vision and framework that the masterplan required by CP9 should provide.

Other comments

There is a contradiction between paragraph 5.14 of the plan, which refers to the campus as providing higher education, and the comment on page 51, which refers to the campus as providing further education. This is not mere semantics. There is an important distinction between further education (providing education for the local community) and higher education. The University provides higher education, which is for students from across the country and beyond, and raises different issues of housing and transport needs. Page 51 should be corrected to refer to higher education.

We agree with the Council that the policy is wholly compliant with the NPPF and is not excessively restrictive.

Word count: 1039