



**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.

In the May 2013 consultation on the draft Local Plan the University strongly supported the positive wording of Core Policy 10 in relation to its Harcourt Hill Campus.

Unfortunately the revisions made to the policy since that time mean that the policy is now less positive and would be likely to restrict the University's ability to create a thriving Campus at Harcourt Hill. The University considers that the current Core Policy 9: Harcourt Hill Campus is unsound for the following reasons:

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 National Planning Policy Framework 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
3. It does not make reference to the need for a pedestrian/cycle link to Lime Road

The reasons for this assessment are as follows:

1. Policy CP9 contradicts Core Policy 30 on Further and Higher Education creating a contradiction in the Local Plan;

Policy CP30 on Further and Higher Education is a very positive policy, which the University strongly supports. This policy states that: *'The most appropriate locations for further and higher education provision are:*

i) by the extension or more intensive use of existing education or other suitable community facilities.'

However, both Policy CP9 and supporting paragraph 5.21 make reference to the Harcourt Hill Campus's location in the Green Belt, with paragraph 5.21 stating that *'proposals will also need to meet the requirements of Core Policy 13: The Oxford Green Belt.'* CP13 on the Green Belt states under clause vii that proposals for redevelopment of previously developed sites should *'not have a greater impact on the openness of the Green and the purposes of including land within it than the existing development.'* If this applies then it would prevent the University from making more intensive use of its Harcourt Hill Campus as supported by Policy CP30. It is fundamentally unsound to have two policies with conflicting aspirations and requirements. Policy CP9 therefore needs to be amended to make it consistent with policy CP30.

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.

CP9 states that the Harcourt Hill Campus Masterplan *'should be prepared to a standard suitable for submission as an outline planning application.'* This requirement is considered to be excessive. The Council's validation checklist indicates the long list of reports required to accompany an outline application. To require these at the masterplanning stage is to subvert its whole purpose, which is to establish the broad parameters of development, which can then be addressed in more detail at the planning application stage, whether this is for full permission, outline or reserved matters. There is no indication of any such requirement in the Town & Country Planning (Local Planning) (England) regulations 2012, within part 4 paragraphs 8, 9 and 10, which set out the form and content of Supplementary Planning Documents. It is also directly contrary to 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.' It is also contrary to paragraph

development. It is also contrary to Paragraph 21 of the NPPF, which states that *'investment in business should not be over-burdened by the combined requirements of planning policy expectations.'*

It is also not practical as the implementation of the Harcourt Hill Masterplan will take place over the next twenty years. Details of what will be implemented will inevitably change over time and the information about them is limited at this stage. In bringing forward the proposals in the Masterplan the University will also not do this through a single outline planning application. It will be done through a series of planning applications showing a phased redevelopment of the campus. The requirement under CP9 (ii) that the Masterplan should include *'a comprehensive landscape, tree and planting strategy,'* is therefore not achievable at this stage. Instead it is considered that broad principles should be established such as those contained in the Landscape Framework and Tree Strategy submitted to the Council with the draft Masterplan in December 2012, which stated in paragraph 5.1 that *'Detailed design proposals will need to be developed as each area is tackled as part of the implementation of the masterplan.'* To require a detailed landscape, tree and planting strategy would also make the Masterplan inflexible and defeat the whole purpose of a Masterplan in providing a framework within which the detailed proposals are then subsequently developed through the planning application process.

3. It does not make reference to the need for a pedestrian/cycle link to Lime Road

In order to ensure that travel to the University campus by sustainable modes is promoted the provision of a pedestrian/cycle link to Lime Road is important. This is proposed as part of the Bovis Homes development, but reference in the policy will help to ensure that this link is created.

Conclusion

Paragraph 6.40 of the Local plan 2031 states that: *'Core Policy 30 supports improvements to further and higher education facilities to help ensure local people have opportunities to gain the skills needed to access the jobs available and local employers have access to a suitably skilled local labour force.'* The Harcourt Hill Campus plays an important part in this process by training teachers. At present many of the buildings at Harcourt Hill date from the mid twentieth century and do not provide modern educational facilities suitable for the twenty first century. It is therefore essential that there is a supportive Local Plan Policy that will enable the redevelopment of the Campus over the next twenty years. This is also necessary to ensure compliance with the NPPF which states in paragraph 19 that *'The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth.'*

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.

As set out above policy CP9 is inconsistent with policy CP30 and the NPPF by imposing excessive restrictions on the University's ability to develop the Harcourt Hill Campus. It is therefore considered that the policy should be amended by deleting the words in red and adding the words in blue as indicated below.

Policy CP9

'The Council will work proactively with Oxford Brookes University, Oxfordshire County Council, local residents and other appropriate stakeholders to help the university to develop a masterplan for the Harcourt Hill Campus site that meets the university's longer term business needs for predominantly educational uses and in a manner that respects its **Green Belt setting and** urban-rural fringe context.

Proposals for the upgrading or redevelopment of the Harcourt Hill Campus will be supported where brought forward through a site-wide masterplan that sets a clear vision for the future use of the site. The masterplan should **be prepared to a standard suitable for submission as an outline planning application**, clearly identifying and addressing key site issues including but not limited to the following matters:

- i. the scale of development proposed and intended uses
- ii. the integration of built form into the landscape including a **comprehensive** landscape, tree and planting strategy
- iii. sustainable site access including by public transport, **and indicate the approach that will be taken to ensure** the effective management of car trips and car parking demand to a level that can safely be accommodated on the local road network, and
- iv. the safeguarding of long distance views of the site from Oxford, to ensure that new development does not detract from views of the existing spires by reason of its height or form.

Development proposals on land at the rear of 1 to 33 Lime Road must incorporate the provision of a pedestrian/cycle link from Oxford Brookes Harcourt Hill Campus to Lime Road.'

Separate representations have been submitted in relation to policy CP13 seeking the removal of the built part of the Harcourt Hill campus from the Green Belt. In accordance with these representations it is requested that the first sentence of paragraph 5.19 is deleted which states:

'Harcourt Hill Campus is located in a wooded section of the Oxford Green Belt on the urban rural fringe,' and the final sentence of paragraph 5.21 which states that: **'Proposals will also need to meet the requirements of Core Policy 13: the Oxford Green Belt.'**

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 proposed policy will have a significant impact on the operation of the Harcourt Hill Campus and affect the quality of the education provided there.

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:

12/12/14

