

HOLTON PARISH COUNCIL RESPONSE TO:

South Oxfordshire Local Plan 2032 Preferred Options (Stage Three of the Process) June 2016

Question 7

Holton Parish Council (HPC) recognise that South Oxfordshire District Council (SODC) need to find housing numbers within their administrative boundary. However, there are significant flaws in the assessment of the Oxford Brookes (former) Wheatley Campus both in the Local Plan 2032 Preferred Options and the Sustainability Appraisal (June 2016).

It should be noted that the site is still currently in use by Oxford Brookes with the expectation to move all activity from the site by 2021/2022. It is considered that the use of the word 'former' in the policy is premature, misleading and incorrect.

Site Area

The red line as shown on page 39 of the Local Plan 2032 Preferred Options includes both brownfield (previously developed land) and greenfield, made up of playing fields and open space. HPC do not agree to the inclusion of the greenfield element of the site allocation.

A recent letter received from Oxford Brookes indicates that the net capacity of 300 dwellings would be doubled if the whole site was proposed for housing. It is considered that this is completely inappropriate to the purposes of the Green Belt, notwithstanding the significant increase in population/housing numbers for Holton that currently has 135 dwellings.

At present the Parish of Holton, including Oxford Brookes Wheatley Campus, is 'washed over' by the Green Belt.

Para 83 of the National Planning Policy Framework (NPPF) states:

The Green Belt serves five purposes:

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

It goes on to state at para 89:

A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- *buildings for agriculture and forestry;*
- *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
- *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 in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*
- *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.*

The inclusion of all land as shown within the red line of the Oxford Brookes (former) Wheatley Campus is not in accordance with para 83 or 89 of the NPPF. It is accepted that redevelopment of only the built up areas of the site are broadly in accordance with para 89 (5th bullet point). However, the inclusion of all elements not built upon would have a *greater impact on the openness of the Green Belt* and would be detrimental to the *safeguarding [of] the countryside from encroachment*.

SODC recently reviewed its Green Belt (Local Green Belt Study for South Oxfordshire District Council, 14 September 2015) whereby sites were recommended for removal from the Green Belt. Of note, the recommendation for Oxford Brookes Wheatley Campus (para 14.5 of the Local Green Belt Study for South Oxfordshire District Council) is

*The Study also recommends inset areas at Culham Science Park, Grenoble Road and the Wheatley University Campus. These are **tightly drawn around the built form** [emphasis added] to avoid taking in open land that meets the five purposes around the inset area. It is however suggested that at Culham Science Park further assessment is carried out on land to the west of the Park. However it is also constrained by the difficulty in finding a well defined new boundary to the Green Belt, in accordance with NPPF, without taking a large swathe of open land to the west.*

The red line as included in the Local Plan Preferred Options does not adhere in any form to the recommendations of the 2015 Study.

Of note no significant evidence, including biodiversity, landscape, transport, heritage/archaeology etc. has been produced to justify the removal of the whole site as shown in the Local Plan Preferred Options and therefore it cannot be completely removed from the Green Belt on this basis.

The greenfield elements included within the red line of the Local Plan Preferred Options is predominantly playing fields and open space. Para 74 of the NPPF states:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

At present a number of local private sports clubs utilise the playing fields at Oxford Brookes Wheatley Campus, for example Holton Cricket Club and Wheatley Tennis Club. There are no suitable alternative venues for these local clubs to move to without ranging further away from Wheatley and Holton which is not sustainable or satisfactory. It is clear that the redevelopment of all land as shown within the Local Plan Preferred Options is not in accordance with para 74 of the NPPF.

HPC request that SODC reconsider the red line as shown in the Local Plan Preferred Options whereby it considers only the built up area/brownfield land, in line with the recommendations of the Green Belt Study.

The red line identified in the Local Plan does not accord with the area being considered by the Wheatley and Holton Neighbourhood Plan which is the previously developed brownfield area excluding the playing fields and open space.

The “Brownfield Development Opportunities” (Local Plan paras 5.44/45 Page 39) assume that the main use of the redeveloped Oxford Brookes Wheatley Camps would be housing. This is premature and could be at odds with the Wheatley and Holton Neighbourhood Plan if it were to come to the conclusion that the preferred use for the redeveloped site is educational, recreation, sports and light industry (relating to academia like R & D).

Local Plan Para 5.45 Page 39 states that the nature of the Oxford Brookes Wheatley Campus is suburban. This is far from the reality of its position. A review of the map will show that it is divorced from Wheatley by the A40 and it is annexed on three sides by farmland and open space, with the campus including a significant scheduled monument.

It is not appropriate to encroach beyond the brownfield element and undermine the purposes of the Green Belt.

Sustainability Appraisal (SA)

The SA assesses Oxford Brookes (former) Wheatley Campus (see Table 20) incorrectly and does not indicate the true impact of the site on the local area. The following sets out the key flaws in the assessment.

Sustainability Appraisal Objective 1

The assessment refers to the site in the Parish of Holton. It then goes on to state only the key facts of Wheatley in relation to population and housing ownership. There is no reference to Holton’s population or housing ownership. It is considered that although Wheatley is an adjoining village, is a ‘larger village’ and has a larger population the assessment should primarily take into account Holton to be a true reflection of the site in its locality.

Sustainability Appraisal Objective 3 and 4

Again the assessment only refers to Wheatley with no reference to Holton. This is flawed.

Sustainability Appraisal Objective 5, 8 and 11

The first reference is incorrect and does not distinguish that there are both brownfield and greenfield elements of the site within the red line as provided.

It then refers to *it is likely to be an increase in car borne traffic locally, both during construction and operation*. It is considered that it is not only likely it is inevitable and that this has not been properly quantified or assessed as to the impact of additional vehicles on rural village roads.

Sustainability Appraisal Objective 6

The site may be adjacent to Wheatley – a larger village – but at no point throughout the SA has any consideration been given to the impacts on Holton.

It is considered that the 'employment opportunities' provided by the London Road Industrial Estate have been overplayed as this is a very small employment base. It is acknowledged that there is local employment but no assessment has been made as to the availability and whether such a redevelopment of the site would be sustainable in employment terms.

Sustainability Appraisal Objective 7 and 8

No consideration has been given to the numerous Tree Preservation Orders (TPOs) on the site. In addition the assessment does not make reference to the contribution of the *various mature trees, grassland areas and vegetation surrounding and within the site* have to the protection of the Green Belt.

The Local Green Belt Study for South Oxfordshire Final Report Sept 2015 suggested that the Oxford Brookes site **could be** inset from the Green Belt. This assessment was based on merely a desk based assessment with no supporting landscape and visual impact or a proper assessment of the Green Belt in this location. It should be noted that the Green Belt 'washes' over the Oxford Brookes site and therefore very careful consideration should be given to para 83 and 89 of the NPPF so as to not harm the purposes of the Green Belt nor encourage inappropriate development, both of which are being encouraged by SODC in the site allocation's present form.

Sustainability Appraisal Objective 9

The assessment fails to recognise the Scheduled Ancient Monument on site – Moated Site 580m South West of Church Farm. A simple search of Historic England notes 37 Listed Buildings within a 600m radius of the centre of the Oxford Brookes Wheatley Campus site, including Grade II, II* and I. In addition, no consideration has been given to the Grade I St Bartholomew Church, located approximately 300m from the nearest site boundary of Oxford Brookes Wheatley Campus. This is a significant flaw in the assessment and needs to be rectified.

Conclusion

- 1) Review red line to be tightly drawn around the built form.
- 2) Reconsider the potential use of the Oxford Brookes Wheatley Campus to put more emphasis on uses other than housing.
- 3) Due to the significant omissions from the SA assessment of the Oxford Brookes site it is requested that the SA is repeated with the correct information inputted.