

# Consultee Comment for planning application 22/01715/OUT

<b>Application Number</b>	<input type="text" value="22/01715/OUT"/>
<b>Location</b>	<input type="text" value="Land South Of Perdiswell Farm Shipton Road Shipton On Cherwell"/>
<b>Proposal</b>	<input type="text" value="Erection of up to 500 dwellings with associated access, open space and infrastructure"/>
<b>Case Officer</b>	<input type="text" value="Linda Griffiths"/>
<b>Organisation</b>	<input type="text" value="West Oxfordshire District Council"/>
<b>Name</b>	<input type="text" value="Abby Fettes"/>
<b>Address</b>	<input type="text" value="Abby Fettes Planning And Sustainable Communities Elmfield New Yatt Road Witney Oxon OX28 1PB"/>
<b>Type of Comment</b>	<input type="text" value="Object"/>
<b>Type</b>	<input type="text"/>
<b>Comments</b>	<input type="text" value="Please find attached comments from West Oxfordshire District Council."/>
<b>Received Date</b>	<input type="text" value="29/07/2022 12:11:01"/>
<b>Attachments</b>	The following files have been uploaded: SE Woodstock 22-01715-OUT.pdf



## **Comment on Application**

**Application No:** 22/01715/OUT

**Proposal:** Erection of up to 500 dwellings with associated access, open space and infrastructure on land south east of Park View, Woodstock

**Address:** Land South of Perdiswell Farm, Shipton Road, Shipton-on-Cherwell

Dear Cherwell Planning Team,

Further to your letter of 1 July, please find below officer comments on the planning application submitted by Blenheim Estate Homes for a residential development of up to 500 new homes on land within Cherwell District Council's area, but abutting the town of Woodstock which lies within West Oxfordshire District.

In summary, West Oxfordshire District Council (WODC) objects to this proposal.

The comments below focus mainly on the principle of development in this particular location but do include some detailed observations where relevant.

### **Background**

As you know, this site was considered and rejected by the Local Plan Inspector as part of the examination into the Cherwell Local Plan 2011-2031 Partial Review (adopted September 2020). Pages 12 and 13 of the Local Plan Inspector's Report set out his conclusion. West Oxfordshire District Council's Matter 8 Written Statement contains useful information, including landscape and heritage reports produced by consultants Chris Blandford Associates on our behalf

<https://www.cherwell.gov.uk/downloads/download/1347/matter-8-written-statements---woodstock>

### **Main issues of concern**

In considering the proposed allocation of the site at Woodstock in the Cherwell Local Plan 2011-2031 Partial Review, West Oxfordshire District Council (WODC) identified three main issues:

- Potential adverse impact on the setting of important heritage assets
- Potential adverse impact on the local landscape and setting of Woodstock
- Cumulative impact of proposal in combination with existing housing allocations in the adopted West Oxfordshire Local Plan 2031

These three areas of concern continue to be applicable.

In addition to these three issues, given the distance of the proposed development from the centre of Woodstock and from the main local services and facilities, I have concerns that the proposal could result in a separate, relatively isolated housing estate, where travel by car will be the main means of transport.

Please refer to WODC's Matter 8 Written Statement for further details about the issues of heritage and landscape impacts.

The issue of sustainable development and cumulative impact will be addressed below.

### **Sustainable development**

The applicant wishes to create a 'legacy development', incorporating the highest standards of place-making and sustainability.

It is good to see a commitment to sustainable design and construction, for example, through PassivHaus design standards, net-zero development, the use of ground/air source heat pumps and photovoltaics, electric vehicle charging points and high levels of biodiversity net gain and water efficiency.

Sustainable development is much more than sustainable construction, needing to achieve the three objectives of economic, social and environmental gains in an interdependent and supportive way. The applicant provides extensive documentation to support their view that their proposal is sustainable development and is a 'logical extension to Woodstock'. They refer to Cherwell District Council's support and allocation of the site for development through the Partial Review of the Local Plan (albeit for 410 dwellings, of which were to be 50% affordable, as opposed to the current proposal for 500 dwellings, with a target of 35% affordable), as evidence to show that the proposal is suitable.

The fact that the independent Inspector (who examined the Partial Review Local Plan) did not accept Cherwell's allocation is not seen by the applicant as an indication that the site is inappropriate for development. Instead, in paragraph 5.29 of the Planning Statement, it is stated that the site was not progressed 'specifically due to concerns over the site's ability to meet Oxford's unmet need'. However, please refer to paragraphs 53 and 54 of your Inspector's Report where the Inspector expresses concerns about the difficulties accessing Oxford by any means other than car and the incongruous nature of the proposed development, damaging the character and appearance of the area, including some harm to the setting of the World Heritage Site. Issues with regard to Oxford's unmet housing need was only one factor in the Inspector's decision to delete the site from the Local Plan.

The applicant emphasises that national planning policy supports the provision of large numbers of new homes through significant extensions to towns and villages. Paragraph 73 of the NPPF does, however, make clear that identified needs should be met in a sustainable way, on sites that are well located and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). UK Planning and Health professionals (including the RTPI and TCPA) are increasingly advocating the use of the international concept of 20-minute neighbourhoods in order to assess sites and design new places 'in a sustainable way'.

The 20-minute neighbourhood concept sets out to design places so that residents can meet the vast majority of their day-to-day needs within a 20 minute walk (approximately 800m) of their home. Day-to-day needs include shopping, leisure, education, green space and access to work.

The applicant's own Transport Assessment (in section 3.7) identifies that 'the centre of Woodstock has a range of local facilities and services all located approximately 1.6km from the centre of the site' and that the nearest primary school to the site is approximately 1.4km from the centre of the site and the secondary school 1km.

The applicant highlights the proximity of their site to the town's formal recreation facilities. However, the site is approximately 1.3km from the tennis and bowls' club, 1km from the

football/recreation ground and 850m from the open-air swimming pool which is only be used during the summer months.

The provision of a well-designed, safe footpath and cycleway network, together with supporting facilities, will help but these distances indicate how far the new homes will be from the centre of Woodstock and from the local services and facilities. It is likely this would lead to an area with a high car dependency, reducing the positive carbon footprint benefits of sustainably constructed homes. This is further exacerbated when considering trips beyond Woodstock, for example to other settlements for higher order services and facilities and for employment, as identified by your Inspector when considering the possible locations for Oxford's unmet housing need.

Specifically in relation to employment, the applicant's Transport Assessment shows, in Table 3 of their report, that almost 84% of those in the local area of Cherwell and 62% in West Oxfordshire's local area, use a car to travel to work.

A particular concern repeatedly highlighted by local residents is the lack of parking available in Woodstock. The distance of this site from the town centre, means that residents will tend to use their car to travel into the centre, exacerbating the existing parking problems, or, because of lack of parking provision, travel elsewhere (for example to Kidlington for shopping trips).

### **Infrastructure**

I have read and endorse the representations made to this application by Woodstock Town Council and Councillor Graham, particularly in relation to the supporting infrastructure and the cumulative impacts with the existing planned development. The issues with regard to schooling, medical facilities, car park capacity and impact on town centre businesses/retailers, traffic and sewage treatment are highlighted. I am sure other stakeholders, particularly infrastructure providers such as Oxfordshire County Council and Thames Water, will identify further impacts and requirements.

In putting forward three sites for inclusion in the West Oxfordshire Local Plan 2031, Blenheim Estate argued that having the land all in one ownership had the advantage that the supporting infrastructure needs could be addressed in a more comprehensive manner. However, the infrastructure being proposed associated with this new housing site is modest, putting further pressure on the existing infrastructure within the town and the surrounding area.

Woodstock Town Council and Blenheim Estate have produced a useful document – a Community and Infrastructure Delivery Plan for the town:

<https://woodstock-tc.gov.uk/wpcontent/uploads/2021/07/Woodstock-Community-Infrastructure-Delivery-Plan-2019.pdf>

Paragraphs 8.17 to 8.21 of WODC's Matter 8 Written Statement for the Partial Review identifies the Council's concerns about the potential harm of the cumulative impacts of development on Woodstock and the surrounding area. Paragraph 8.18 includes information about Cherwell District Council's own concerns when considering the site to the south east of the town about whether Woodstock could sustain such a substantial size and rate of expansion to its built-up area, particularly in terms of infrastructure capacity, employment opportunities, traffic generation, impact on setting of heritage assets and on the wider character and appearance of the town as a whole.

In response to the request for a scoping opinion for this proposed site, WODC identified a number of issues that required assessment. I still have particular concerns about the water environment, especially a need for a step-change in sewage treatment and the quality of river water, the timely

provision of primary school places and the wider active travel network, including connection to Hanborough Station.

### **Conclusion**

This land, to the south east of Woodstock, is in a sensitive location, particularly in relation to heritage assets, given the proximity of the Blenheim Villa Scheduled Monument and the Blenheim Palace World Heritage Site, and the open countryside setting to the built up area of the town.

As part of the Cherwell Local Plan Partial Review, WODC appointed Chris Blandford Associates to undertake a landscape and visual review of the site and a heritage assessment. Chris Blandford Associates concluded that the development of the site would harm the setting and significance of the scheduled monument and would have a detrimental impact on the open countryside setting of Blenheim Palace World Heritage Site by virtue of its location, size and lack of relationship to existing historic or 20th century urban form. They also concluded that proposing a 'finger' of housing extending out into the countryside would result in development which would relate poorly to the existing settlement pattern. The poor relationship with the urban edge and the landscape sensitivities of the site led them to state that development should be resisted on this site.

These conclusions are still relevant.

The proposal contrasts with the West Oxfordshire Local Plan 2031 East Woodstock allocation (currently under construction) which provides a well-integrated extension to the existing built form of the town.

Further significant growth to Woodstock runs the risk of adversely impacting on existing infrastructure and, as this is a site some distance from the main services and facilities, of creating a separate, relatively isolated housing estate, where travel by car will be the main means of transport.

Given that the NPPF advocates a plan-led system for development, assessment of future areas for large scale growth are best undertaken as part of the review of a local plan. This is timely as both WODC and Cherwell District Council are reviewing their local plans.