



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Ms Samantha Taylor
Cherwell District Council Planning Department
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c.c. Planning@cherwell-dc.gov.uk

29th July 2022

Dear Ms Taylor

**Re: Planning Application 22/01715/OUT
Land South Of Perdiswell Farm Shipton Road Shipton On Cherwell
Proposal Erection of up to 500 dwellings with associated access, open space and infrastructure**

I write to express the Campaign to Protect Rural England's strong objection to the above mentioned planning application, a similar proposal to which was rejected by the Planning Inspectorate in 2019. One of the main reasons being that houses on this site, being adjacent to the Green Belt would constitute an unacceptable incursion into the countryside.

Previous Planning Inspectorate Decision

As stated above, in 2019, Paul Griffiths, the Inspector, ruled this site out of the Cherwell LP stating, *"it is my view that the development of the site for housing would represent an incongruous extension into the countryside that would cause significant harm to the setting of Woodstock, and the character and appearance of the area"*. The developer's documents state the current proposal *"captures and responds to the characteristics of Woodstock."* Frankly, CPRE sees little evidence that these are no more than words to address this previous criticism.

The original objection is addressed by nothing in these documents and it seems staggering that the Blenheim Estate, which trumpets its green credentials, should support the simple reapplication of an unsuitable proposal. Similarly, merely stating that this represents a "modest extension" to Woodstock is given the lie by the fact that this, and the other developments supported by Blenheim, would see the town grow by perhaps a third in area and by nearly half in housing numbers. This scale of expansion and the level of harm to Woodstock and its environs is unconscionable.

Cherwell's Local Plan 2011-2031.Policy ESD 13, states that proposals will not be permitted if they would:

- Cause undue visual intrusion into the open countryside



- Cause undue harm to important natural landscape features and topography
- Be inconsistent with local character
- Impact on areas judged to have a high level of tranquillity

To be candid, this proposal causes harm in at least two of those respects.

Furthermore, Policy ESD 15 requires constrains the authority to “Conserve, sustain and enhance designated and non-designated ‘heritage assets’ (as defined in the NPPF) including buildings, features, archaeology, conservation areas and their settings, and ensure new development is sensitively sited and integrated in accordance with advice in the NPPF and NPPG.”

Once again, how can this proposal be adjudged to fit within the constraints of that requirement.

These are policies, requiring compliance, not guidance. The NPPF 2012, Paragraph 182, requires the Local Plan to be sound, and in particular: justified, effective and deliverable, in line with policy. CPRE fails to see how this could be achieved if this proposal were to be approved.

The proposal to expand the town of Woodstock by 500 houses is unacceptable on a number of counts. The increase in population and the additional strain this will place on the town’s infrastructure, through the growth by some 1,200 - 1,500 additional residents and most likely 1,000 vehicles, will be a massive strain on the town’s ability to absorb the additional interactions and vehicle movements. Roads within the area are already busy, with progress through Woodstock frequently slow, particularly in high season for tourists. Realistically, a development of this size will overwhelm local amenities in terms of schools and medical facilities, before any considerations of leisure are taken into account.

Blenheim already plans to increase the number of homes by 720 at the Park View, Hill Rise and Banbury Road developments. Therefore, an additional 500 houses are totally unsustainable for a small town.

Cherwell’s current lack of 5 Year Housing Land Supply

The current situation is that Cherwell lacks a supply of land for the five year housing supply and this development appears to be exploiting this situation. NPPF Para 11d states “where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. “

The adverse impacts in this case do significantly and demonstrably outweigh the benefits when assessed against the overall Framework and supporting sustainable development. Additionally, they contravene the NPPF’s fundamental environmental objective ‘to protect and enhance our natural, built and historic environment’



It would seem the Blenheim Estate cynically seeks to exploit the current situation, of a lack of five year housing supply, to subvert the Local Plan process and undermine local democracy. These are the actions we have come to expect from the worst of the speculative development industry, but it is both astonishing and depressing that it should be an approach adopted by the Blenheim Estate. Its claim to be *'the proud steward of our land, in England's most idyllic countryside'* rings utterly hollow.

Traffic

The Cherwell Local Plan 2011-2031, Policy SLE 4 states that development that is not suitable for the roads that serve the development and that has a severe traffic impact with not be supported. These other developments, in conjunction with this proposal, in the area make it highly likely that traffic congestion will become significantly more pronounced; this in addition to the regular events which the Blenheim estate also holds. This will add to the suggested uplift in pollution which will be produced by 500 houses, which is already calculated to be high and that in addition to those of the other developments. The overall number of additional houses is estimated at 1,200 and this could give rise to over 2,000 new vehicles in the area, with high additional traffic events.

Further still, according to the proposal, the Woodstock environs will be set for 11 years of development. This seems an extraordinary amount of time for any proposal and will simply add to the disruption to the environment, most likely over a wider area than the original plan site. The proposal is suggesting that there will 60 traffic movements for every day of that period, however, potentially there could be significantly more with workforce travel requirements.

Bio-diversity

CPRE sees no evidence in the documentation to support the claimed expansion of bio-diversity in this proposal, given the presence of large fauna, in particular, which will simply be banished by the presence of the development. The suggested improvements to flora, whilst being beneficial to smaller species in isolation, will not mitigate the removal of habitat for larger fauna, and given the size of the site, will lead to an inevitable impact on the bio-diversity of the area. Tawny owls, song thrushes and warblers are not frequent visitors to housing estates. It is difficult to envisage that the required uplift of at least 10% will be achievable. Simply creating habitat does not necessarily result in greater bio-diversity, without consideration of the context and situation of the habitat. This aspect of the proposal requires a much higher level of scrutiny.

Archaeology

The initial plan drawings show a primary road being routed through an area of high archaeological interest and a further one of low archaeological interest. There is a distinct possibility that the building of a significant housing development on this site might obliterate important archaeological evidence unless a full survey of the plot is conducted. This is clearly contemplated in the response from the County Archaeologist on 1st July 2022.



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Yours sincerely,

Robin Oliver
Chairman, Cherwell District