

Response Date: - 08/08/2022

Application Number: - 22/01715/OUT

Location: Land South of Perdiswell Farm Shipton Road Shipton on Cherwell

Proposal: Erection of up to 500 dwellings and infrastructure

Bladon Parish Council (BPC) **objects** to the above proposal for reasons outlined below. BPC would like to highlight the final part of this response should the Council choose to disregard our objection and be minded to grant permission for the application.

Summary of Objections

1) Location of the Development Will Have Adverse Effect on the Area

- The proposal is contrary to many policies within Cherwell's adopted Local Plan 2011-2031 (Part 1)
- The location of the development will result in the harmful loss of openness of the area between the two currently distinct settlements of the town of Woodstock and the village of Bladon. It will make a significant incursion into the open countryside
- The development will contribute to the coalescence of these settlements
- The development is not within the build limits of an existing village and will create a separate community rather than integrating with an existing community

2) Unmitigated Increased in Traffic Through Bladon

- There will be an increase in traffic flowing through Bladon Village with no mitigation offered

3) Unacceptable Impact on Local Infrastructure Including Lack of Affordable Housing

- There will be increased pressure on infrastructure and services (used by Bladon residents) in the town of Woodstock which will put many components of infrastructure over capacity
- Marlborough School is currently at capacity and current plans show that is being expanded to accommodate organic growth (150 students) from within the Town. There is no capacity to expand further to accommodate the additional children generated from the Land East of Park View development. There is a high risk that children from Bladon will not be able to attend their catchment school
- Unless Cherwell changes their Housing Allocation Scheme, the Affordable Housing Provision will not be available to Bladon's residents

Bladon Parish Council's objections are covered in more detail in the next section.

1) Location of the Development Will Have an Adverse Effect on the Area

1.1 Bladon Parish Council **objects** on the following grounds:

- a. The proposal is contrary to many policies within Cherwell's adopted Local Plan 2011-2031 (Part 1)
- b. The location of the development will result in the harmful loss of openness of the area between the two currently distinct settlements of the town of Woodstock and the village of Bladon. It will make a significant incursion into the open countryside
- c. The development will contribute to the coalescence of these settlements
- d. The development is not within the build limits of an existing village and will create a separate community rather than integrating with an existing community, contravening Cherwell's Local Plan.

1.2 Regarding mitigation, BPC does not feel that there is any mitigation that can assuage the adverse effects of the development on the proposed location in the open countryside.

Our objections are supported by the following points:

1.3 The development is in the open countryside between Woodstock and Bladon and is not situated within the built-up limits of either village. It is not within the boundaries of any of the larger and or more sustainable villages in Cherwell district and is not in the main area of planned growth in Cherwell.

This makes the location contrary to the Local Plan which states:

Section A – Strategy for Development in Cherwell

A.11 Our spatial strategy for Cherwell District is as follows:

- *Growth across the rest of the District will be much more limited and will focus on meeting local community and business needs. It will be directed towards the larger and more sustainable villages within the District which offer a wider range of services and are well connected to major urban areas, particularly by public transport.*
- *Development in the open countryside will be strictly controlled. In the south of the District, the Green Belt will be maintained, though a small scale local review of the Green Belt will be conducted to accommodate identified employment needs at Kidlington.*

Section B – Policies for Development in Cherwell

B.2 Theme Two: Policies for Building Sustainable Communities

B.88 *By focusing development in and around the towns of Bicester and Banbury we aim to ensure that the housing growth which the District needs only takes place in the locations that are most sustainable and most capable of absorbing this new growth.*

1.4 The location of the development will result in the harmful loss of openness of the area between the two settlements of Woodstock and Bladon and is a significant incursion into the open countryside. The proposal threatens the distinctive characters of historic villages of Bladon and Woodstock and will promote the coalescence of the settlements. It will

erode the sense of leaving one community and entering another. This coalescence will be further exacerbated due to the planned developments around Kidlington Airport including a Park & Ride, and expansion in both Begbroke and Yarnton. Overall, this will have the effect of developing a suburb of Oxford and destroy the smaller individual communities that make this part of Oxfordshire so attractive.

This again is contrary to the Local Plan which states:

B.2 Theme Two: Policies for Building Sustainable Communities

B.89 *We aim to avoid development in inappropriate locations and coalescence with neighbouring settlements.*

B.174 *The Local Plan will help to ensure that growth and development does not take place at the expense of the very features which make Cherwell unique. For example, coalescence between the areas for strategic development and neighbouring villages.*

B.87 *Cherwell's countryside, landscape and green spaces are important natural resources. They form the setting of our towns and villages, contribute to their identity and the well-being of Cherwell's communities, and provide recreation opportunities.*

- 1.5 The proposal will create an isolated development of 500 dwellings with little connection to either Woodstock or Bladon and instead of a development that fully integrates with existing settlements it will have the feeling of a separate community.

This again is contrary to the Local Plan which states:

B.2 Theme Two: Policies for Building Sustainable Communities

B.86 *We wish to ensure that new development fully integrates with existing settlements to forge one community, rather than separate communities (see 'Policy ESD 15: The Character of the Built and Historic Environment').*

- 1.6 The site is not an allocated site within the Local Plan and but was reviewed in the Examination of the Cherwell Local Plan 2011 - 2031 (Part 1) Partial Review – Oxford's Unmet Housing Need. Due to the inspectors' concerns, the site was removed from the Local Plan.

The inspector commented that building in this location:

"would appear incongruous and damage the character and appearance of the area. While not on its own a significant issue, this incongruity would cause some harm to the setting, and thereby the significance of the Blenheim Palace World Heritage Site that lies to the west of the proposed allocation. The challenges of developing the site in an acceptable way are evident in the rather contorted way in which housing on the site would be arranged in relation to green space and the need for screening woodland as shown on the Policy PR10 Policies Map."

In the Post-Hearing Advice note the inspector commented:

"notwithstanding the potential for screen planting, 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."

- 1.7 Due to its size, scale, and location, this development will have a negative impact on Blenheim Palace, which is a UNESCO World Heritage Site. It will affect the important visual links of the surrounding villages and landscape to the Palace itself.

UNESCO justifies the status of Blenheim by its setting:

The integrity of the property is well protected by its enclosing wall but important visual links do exist between the gates, the parkland buildings, buildings in the surrounding villages and landscape, and care needs to be taken to ensure these key visual links are protected.

This negative impact was also identified in the inspector's report in the Examination of the Cherwell Local Plan 2011 - 2031 (Part 1) Partial Review – Oxford's Unmet Housing Need. See section 4 above.

- 1.8 Although not within the Green Belt, the full length of the site's eastern boundary along the A4095 is separated only by the width of this road from the adjacent Oxford Green Belt. The planned development is concentrated to eastern quarter of the site and as such will be very close to the edge of the Green Belt boundary. It will be visible from the boundary and affect the characteristic and openness of the Green Belt.

The Oxford Green Belt boundaries are protected in the local plan under:

Policy ESD 14: Oxford Green Belt

The Oxford Green Belt boundaries within Cherwell District will be maintained in order to:

- *Preserve the special character and landscape setting of Oxford*
- *Check the growth of Oxford and prevent ribbon development and urban sprawl*
- *Prevent the coalescence of settlements*
- *Assist in safeguarding the countryside from encroachment*
- *Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

2) Unmitigated Increase in Traffic Through Bladon

- 2.1 Bladon Parish Council **objects** on the following grounds:

- a. There will be a significant increase in the traffic flow through Bladon Village with no mitigation being offered

- 2.2 Regarding mitigation, BPC requests that, should the Council disregard its objections and be minded to grant permission for this development, that it request relevant mitigation from the developer be it through works or S106 contributions to ensure that residents of Bladon are not unduly affected by the increase in traffic. This mitigation could include items such as pedestrian crossings and other traffic calming features like speed VAS.

Our objection is supported by the following points:

- 2.3 Bladon Village is bisected by the A4095, already a busy A-road with approximately 10,463 vehicle movements a day. The village has a mixture of housing and community facilities on

both sides of the road, with Bladon Primary School on the south side. There is no secondary school in the village and the local children travel to Marlborough Secondary School in Woodstock. Woodstock is the nearest town to Bladon for local amenities such as GP surgery or Library. The nearest bus stop to Oxford is on the A44 near the roundabout.

- 2.4** None of the application documents cover the impact of traffic through Bladon. In general, it is suggested there will be less impact on congestion than we would expect because the proposal envisages a [distant] future of non-car use but any increase in car use will affect Bladon village and the safety of the villagers.

There are no cycle paths through Bladon and the footpaths are narrow, with only one pedestrian crossing in the village, by the Community Pub, situated towards west of the village. There is no scope for widening the road, nor the footpaths. It is not easy nor safe to cross the road away from this crossing especially towards the east of the village. This issue will be further exacerbated by any increase in traffic.

Children travel on foot and by bicycle to Marlborough School. The nearest bus stop to/from Oxford is on the A44. Although some villagers currently cycle and walk to these locations, the increased traffic and decreased pedestrian and cyclist safety will no doubt change people's travel habits, deterring people from traveling sustainably through and within the village and increase the use of travel by car, unless the impact of the increase in traffic can be mitigated by developer to make cycling, walking and public transport a safe option for travel.

- 2.5** The estimated increase in traffic suggested in the application is as follows:

- There will be 2,388 movements from the site in a 12 hour period (7am-7pm) (Table 7 Transport Assessment Part 1) with 268 during the AM Peak and 273 during the PM Peak.
- It has been estimated that 17% of the peak traffic will route through A4095 Grove Road.
- It is estimated that in 2027 the development will have increased traffic movements along the A4085 Grove Road by 8.7% or **938** additional movements a day, from 10,722 to 11,660 (Tables 8.7 & 8.8 Environmental Statement Chapter 8).
- This increased traffic is in addition to the estimated increase of **553** movements a day from the existing 2022 baseline 24-hour AADT of 10,463 to the 2031 Future Baseline traffic flow of 11,016 (Tables 8.6 & 8.7 Environmental Statement Chapter 8).
- The total increase in traffic, although not all created by the development, will be an additional **1,491** movements a day, from 10,463 to 11,954.
- The traffic will increase along Grove Road in the AM Peak by **46** movements from 1080 to 1126 movements in an hour and by **47** movements in the PM Peak going from 1,188 to 1,235 (Tables 8.10 Environmental Statement Chapter 8).

- 2.6** Although the additional traffic generated during the AM and PM Peak hours may appear minimal it does mean that on average 1 car every 3 seconds travels along Grove Road. This shows that it makes crossing the road difficult and not particularly safe.

- 2.7** It should be noted that the Transport Assessment appears to be inadequate. It does not cover the impact of the development on the A4095 Grove Road, Bladon, or the junction of the A4095 and Station Road, Long Hanborough.

For example, in the Transport Assessment, under Section 3.2 Local and Wider Road Network, all that is mentioned is that the A4095 routes through the village of Long Hanborough and does not acknowledge that it is a major route to the West of the County which avoids the A40, A44 and A34 congestion. Vehicles travel through Bladon so that they can join the A40 at Cassington or Eynsham. It is also the only route to Hanborough Station, which is the closest station to the development and being promoted as a sustainable travel option by the developer.

This lack of inclusion in the Local and Wider Road Network assessment ignores the fact that it has been acknowledged that at least 17% of the peak traffic from the development will travel via the A4095 Grove Road (Table 9 Transport Assessment Part 1). This is more than the 14% expected to travel via A44 Oxford Road, yet the impact on A44 Oxford Road and its junction with Hensington Road/High Steet in Woodstock has been addressed even though the estimated increase in traffic flow is lower than the increase of traffic through Bladon.

- 2.8** Due to the site location and the current planned entrance being on to A4095 Upper Campsfield Road there are only 5 available traffic routes, one of which is the A4095 through Bladon. BPC questions if the estimation that 17% off traffic will go via Bladon is an underestimate.
- 2.9** It is difficult to identify within the Transport Assessment if any of the approved current and upcoming developments have been included in the future baseline traffic flows (Tables 8.6 & 8.7 Environmental Statement Chapter 8).

Although 3 sites (North of Hill Rise, North Banbury Road in Woodstock, and North of Witney Road, Long Hanborough) are mentioned in the Transport Assessment, it is not clear if projections for these developments have been included in the traffic flow or if they have just been used for the junction assessments.

Bladon will be expecting increased traffic flows from several proposed developments in Woodstock, Long Hanborough, Witney and Salt Cross Garden Village in Eynsham, as well as from the potential P&R by Bladon Roundabout and the expansion of Long Hanborough Station. It is not clear if these have all been taken into consideration when calculating future traffic flows and the additional impact of the Land East of Park View development on the capacity of the highway network.

3) Unacceptable Impact on Local Infrastructure including Lack of Affordable Housing

- 3.1** Bladon Parish Council objects on the following grounds:
- a. There will be increased pressure on infrastructure and services in the town of Woodstock (used by Bladon residents) which will put many components of infrastructure over capacity, with minimal mitigation being offered
 - b. Marlborough School is currently at capacity and current plans show that is being expanded to accommodate organic growth (150 students) from within the Town. There is no capacity to expand further to accommodate the additional children generated from the Land East of Park View development. There is a high risk that children from Bladon will not be able to attend their catchment school
 - c. Unless Cherwell changes their Housing Allocation Scheme, the Affordable Housing Provision will not be available to Bladon's residents

- 3.2** Regarding mitigation, Bladon Parish Council requests that should Cherwell Council disregard the objections and be minded to grant permission, the developer contributes, as they have indicated that they will, to mitigating the impact on the services and infrastructure Bladon residents use in Woodstock, be it through the direct provision of infrastructure or financial contributions.

BPC requests that the development remains unoccupied unless capacity at the secondary school has been organised to ensure that Bladon's children can attend their catchment school, and that their education is not unfairly affected by this development.

BPC would also request that Cherwell District Council alter the criteria for registering on their housing register so that residents of Bladon will be eligible to apply for the affordable housing on the development.

Our objection is supported by the following points:

- 3.3** The figures provided in the application are based on the assumption that the development could be incorporated into Woodstock Parish. It is only an estimate as the final housing mix may change at reserve matters stage.

The figures show:

- The population will increase by 1,200 from 3369 (as at 2020) to 4,569 an increase of 35.5% (Para 4.36 Environmental Statement Chapter 4)
- This will include an extra 143 secondary school children and 4 SEN children (Para 4.44 Environmental Statement Chapter 4)

- 3.4** The developer has acknowledged the impact of this increase in population on several of the local services that are used by the villagers of Bladon Parish including:

- Marlborough Secondary School in Woodstock
- Springfield School in Witney
- GP Surgery in Woodstock
- Woodstock Library

They have confirmed within both the Environmental Statement Chapter 4 and in Table 9.2 Secondary Mitigation Measure in the Environmental Statement Chapter 9 that they will make a financial contribution towards a range of services including the items listed above.

- 3.5** The value and timing of the contributions are not stated in the application documents. It is assumed that Oxfordshire County Council and Cherwell District Council will identify and request the relevant level of contributions to mitigate the development's impact.
- 3.6** There are concerns around the timing of the contributions and when the improvements will be delivered. The main concern is with the timing of additional spaces for secondary school children.

Any delay in providing additional places at Marlborough School will have a negative impact on Bladon students as they will technically be further away from the school than pupils from the new development. This is an important point as should the demand for places be higher than the yearly intake, pupils from Bladon will have a lower priority than pupils living in the new development when allocating spaces and may not be offered a place at their catchment school. This will mean that they will have to travel to a school further away and maybe not be with other children from Bladon and this will have a detrimental effect on the

children of Bladon in their informative years. Based on current admission numbers this issue could affect 14 children each year.

- 3.7** This scenario is very likely to happen. Although there are plans to extend the Marlborough School by 150 places, which will increase the annual intake from 180 to 210, this is to cater for the current demand with the increase in demand created by new housing already being built in the area, excluding the Land East of Park View site amongst others.

In Oxfordshire County Council's draft Pupil Place Plan 2021-2025 on p134 the Council states that:

“this expansion is related to the housing growth in the town, as set out in the West Oxfordshire Local Plan”

The Land East of Park View site is not in the town of Woodstock and not in the West Oxfordshire Local Plan.

- 3.8** The additional spaces required for this development would need to be provided through a second expansion of the school, which may not be feasible. Should any expansion happen at another school to mitigate the impact, the children of Bladon would still be affected, as they are further away from The Marlborough School then this development and would be forced out of catchment.
- 3.9** If children can't attend Marlborough School, Oxfordshire County Council will also incur additional cost as they have a responsibility to transport children to the nearest available school if the shortest designated route is more than the statutory walking distance of three miles for children aged 8 and over. The two nearest schools to Bladon are more than 3 miles walking distance (based on Google Maps), these are:
- Gosford Hill School, Kidlington 3.5 miles from 1st house nearest Bladon Roundabout and 4.5 miles from the last house near Manor Road
 - Bartholomew School, Eynsham 4.2 miles from the last house near Manor Road and 5.2 miles from the 1st house nearest Bladon Roundabout
- 3.10** There are also concerns regarding the availability of the Affordable Housing Provision covered in the development to people living in Bladon. As the site is located in Cherwell District, the allocation of the affordable housing will be managed by Cherwell District Council.

Due to Cherwell's Housing Allocation Scheme, it is very unlikely that Bladon residents, being in West Oxfordshire District, will meet the criteria to join Cherwell's housing register, and will therefore not be eligible to apply for affordable housing on the site, unless Cherwell adapts their housing allocation policy for the Land East of Park View site and the application process is made easily accessible for people living in Bladon and Woodstock.

- 3.11** The criteria as per Cherwell's Housing Allocation Scheme (Dec 2021) is:

3.6 Who cannot be accepted onto the Housing Register

CDC will refuse an application to join the housing register in the following circumstances:

3.6.2.3 No local / district connection to Cherwell

Applicants without a local connection to Cherwell will not qualify to join CDC's housing register. In order to be considered to have a local connection to Cherwell applicants will need to either:

- 2. have resided in Cherwell for a period of at least 6 out of the last 12 months continuously prior to an application to join the housing register*
- 3. have previously resided in Cherwell for 3 out of the past 5 years*
- 4. have a contract of employment to work within Cherwell for a minimum of 16 hours per week excluding short-term, marginal, temporary and voluntary work. Employees on 'zero hour' contracts must demonstrate a consistent previous record of, or clear expectation to work for a minimum of 16 hours per week.*
- 5. have a contract of employment as a Category 1, 2, 3 or 4 key worker (as defined by section 7.4 of this scheme) to work in Oxfordshire for a minimum of 16 hours per week excluding short-term, marginal, temporary and voluntary work. Employees on 'zero hour' contracts must demonstrate a consistent previous record of, or clear expectation to work for a minimum of 16 hours per week*
- 6. have immediate family members who have lived in Cherwell for at least 5 years, where there has been frequent contact, and there is a clear commitment to, and / or dependency on, those family members immediately prior to the date of application*
- 7. be a household with a Right to Move*
- 8. be leaving the care of Oxfordshire Children's Services; or*
- 9. have a special reason for needing to live in the area*

Exceptions to the above local connection requirements are:

- Those who are currently serving in the Regular Armed Forces or who were serving in the Regular Forces at any time in the 5 years preceding their application to join the housing register.*
- Bereaved spouses or civil partners of those serving in the Regular Forces where (i) the bereaved spouse or civil partner has recently ceased, or will cease, to be entitled to reside in Ministry of Defence accommodation following the death of their Service spouse or civil partner, and (ii) the death was wholly or partly attributable to their service.*
- Serving or former members of the Reserve Armed Forces who are suffering from a serious injury, illness or disability which is wholly or partly attributable to their service.*
- Divorced or separated spouses or civil partners of Service personnel who need to move out of accommodation provided by the Ministry of Defence.*
- Existing social housing tenants, who need to move into CDC's district, either from another local authority area in England, or from one location to another within Cherwell, for work related reasons to avoid hardship (Right to Move Applicants).*

S106 Mitigation - Should the Council Decide to Grant Permission

Although Bladon Parish Council strongly objects to the proposed development, we would like to ensure that, should the Council disregard these objections and decide to grant permission, Bladon Parish is not unduly affected by the development. We request that the developer

provides or contributes to the required infrastructure needed to mitigate the impact of their development on the local infrastructure/services and that Cherwell District Council prohibits the development's occupation until certain infrastructure requirements are met.

To this effect, BPC would request that the developer contributes to traffic calming and safety measures within Bladon to help mitigate the increase in traffic that will affect the village. This may include, for example, pedestrian crossings, other traffic calming/safety improvements such as VAS signage, and measures which improve cycling, walking and public transport access, such as direct bus route from Bladon into Oxford. We would hope to liaise with Oxfordshire County Council regarding the most appropriate mitigation for the village, the estimated cost and justification as required under the CIL/S106 legislation.

BPC would also request that the developer contributes, as they have indicated that they will, to mitigating the impact on the services and infrastructure that Bladon residents use in Woodstock. Oxfordshire County Council (OCC) and Cherwell District Council would be expected to identify the impact and what the value of the contributions should be for Secondary and SEN provision, Library provision and increase GP provision.

BPC requests that the development remains unoccupied unless capacity at Marlborough School has been provided to ensure that Bladon's children can attend their catchment school.

BPC would also request that Cherwell District Council alter the eligibility criteria for registering on their housing register to enable residents of Bladon to apply for the affordable housing on the Land East of Park View development.

Bibliography

Application Documents

1. Environmental Statement Chapter 4
2. Environmental Statement Chapter 8
3. Environmental Statement Chapter 9
4. Transport Assessment Part 1

Other Documents

1. Cherwell's adopted Local Plan 2011-2031 (Part 1)
2. Examination of the Cherwell Local Plan 2011 - 2031 (Part 1) Partial Review Oxford's Unmet Housing Need - Inspectors Report
3. Examination of the Cherwell Local Plan 2011 - 2031 (Part 1) Partial Review Oxford's Unmet Housing Need - Post-Hearing Advice Note
4. UNESCO Website - Blenheim Palace Integrity
5. Pupil Place Plan 2021-2025
6. Cherwell's Housing Allocation Scheme (Dec 2021)