

Woodstock Town Council The Town Hall, Woodstock, Oxford, OX20 1SL

Response to Planning Application 22/01715/OUT Land South of Perdiswell Farm Shipton Road Shipton On Cherwell

Woodstock Town Council has submitted its objections to this proposal previously and re-iterates the points already made in our submissions. It also wholeheartedly endorses the comments made by Bladon Parish Council.

We repeat:

Woodstock Town Council OBJECTS To this proposal IN THE STRONGEST POSSIBLE TERMS.

The development is <u>unsustainable</u>. It is a proposal for a village of 450-500 homes in a green field adjacent to no other dwellings other than the dozen or so houses which comprise the tiny grouping of Upper Campsfield the other side of the A4095. A significant number of the dwellings indicated as two and a half to three storeys making the proposed development likely to be very obvious in views across these fields.

The proposal provides no facilities other than a community hall.

The area for development is outside the boundaries of Woodstock and of West Oxfordshire District. The only direct connection for this development with Woodstock — other than some footpaths — will be a road running through the proposed development from the A4095, crossing a noticeable green space and joining up with Cowells Road on the developing Park View estate which itself is remote from the centre of Woodstock. This road has the potential to be a 'rat run' between the A44 and the A4095. Although the developers suggest a bus route could go through the development, the bus services have made it clear that they regard the proposed road as inappropriate for buses.

The centre of the proposed development is estimated as 1.6km from the nearest shops (the retail and commercial centre of Woodstock). It is 800m from the nearest bus stop. Even if the suggested, but not yet proposed, Park & Ride were to be developed between the A4095 and the airport, this is likely to serve Oxford and Woodstock only. Any suggested Park & Ride will still be quite a distance from much of this proposed development.

Residents bringing home family shopping may be reluctant to have to walk some distance from a bus stop to their homes. Further, trips by bus going north from Woodstock or to Kidlington and Witney as well as Hanborough (and Oxford Parkway?) rail station are still likely to require an 800m trek to the bus stop - unattractive with heavy shopping, small children or luggage.

Residents will be strongly dependent on car use which, if the District Council is serious about combatting Climate Change, is something to be avoided. Moreover, once in their cars, residents are unlikely to use the facilities of Woodstock where parking is nigh impossible (already) and shopping opportunities limited. They are likely to drive to Kidlington or Witney where there is easy parking and a range of supermarkets.

Woodstock will not benefit economically or socially from this development yet it will have to tolerate demands on its social infrastructure which is already stressed and has to anticipate a further 600 homes over the next few years without the addition of this particular development.

Woodstock is currently around 1600 homes. A further 535 homes are under construction or approved and a further 180 refused at Hill Rise are currently being appealed.

- Parking in the town is already a major issue. The about-to-be-implemented parking scheme does not create any more parking spaces than exist already.
- The doctors' surgery is grossly overcrowded and as yet there is no realistic plan to replace this. There is no space for on-site enlargement. It is unrealistic to suggest residents use surgeries in other villages: the new surgery in Hanborough is already 'full' and surgeries in Eynsham have to anticipate enormous increases in the local population there in the near future.
- The schools primary and secondary are going to have problems accommodating pupils from the dwellings already approved or likely to be approved in the near future. The Primary School in particular cannot take pupils from this development as it has no room for further expansion. Yet it is particularly important that children attend their local Primary School. Primary Schools are very much a part of rural communities. Children need to learn about the community inl which they live.
- Traffic on the A44 and the A4095 through Bladon is already a stress for all users. Approved developments in the area will inevitably add to this stress particularly at peak times of day.

Biodiversity net gain in the area of the development seems highly unlikely. Offloading biodiversity gains to other parts of Oxfordshire does not offset the loss of agricultural land and of the open views across the rural landscape which make this part of Oxfordshire so attractive to tourists.

The development would destroy habitat which was a site for skylarks, partridge, barn owls, sparrow hawks and other birds of prey, and deer, foxes, stoats, to name a few residents. If one looks further at the environment that is being destroyed, we believe the <u>setting</u> of the WHS is gradually changing from that of a grand Palace set amongst villages which for the most part were mentioned in the Domesday book, to a suburban villa surrounded by homes and, if not homes, possibly (from other plans circulating) eight foot high solar panels. This will not benefit the important local tourist trade?

The plans avoid any homes on the actual site of the Roman villa. The villa had never been fully excavated. Could there be associated items of archaeological interest also unexplored. It is difficult to believe that building 500 homes will not lead to disturbance of the whole area and damage to heritage.

Lack of a 5-year land supply is being used by the developer as a reason for assessing the application using a tilted balance approach. In the minutes of the meeting of CDC Executive on the 6th February it was recorded that: -

"It is shown that the district now has a 5.4-year housing land supply (for 2022-27) which will need to be taken into account in decision making."

Now that CDC have a 5-year land supply the application should no longer be assessed using the tilted balance approach.

Opinions of the residents regarding future development around Woodstock were sought via two town polls in 2014 and 2016 (**Appendix A**). The results show that many of the residents of Woodstock oppose further development and urbanisation around the fields abutting Woodstock.

In 2014 the residents were asked "Do you oppose any development or urbanisation on green fields abutting and surrounding our town of Woodstock?". The turnout was 25.13% and 638 residents voted. The results were 544 (85.2%) residents opposed to further development/urbanisation on the green fields surrounding Woodstock and 92 (14.4%) residents did not oppose further development/urbanisation.

In 2016 a further poll was undertaken and residents were asked "Do you wish for the green fields including agricultural land of the South East of Woodstock (also known as, or including, or related to the so-called 'Land East of Woodstock' and/or 'Woodstock East') to be protected from development and urban sprawl (RE: the Local Plan)?". The turnout was 19.04% and 484 residents voted. The results were 411 (84.9%) residents supported protecting the land South East of Woodstock from urban sprawl and 73 (15.1%) residents did not support the protection of the area from urban sprawl.

We give further details about our objections below.

Infrastructure

The developer refers to the development being part of Woodstock. Yet the location of this development is in a different parish and local authority to Woodstock. The developers seem to expect services in Woodstock used by new residents will be funded by West Oxfordshire District Council (WODC) or Woodstock Town Council (WTC). Neither authority will receive any precept payments from the development towards these on-going costs as precept payments will be paid to Shipton-on Cherwell Parish Council (SCPC) and Cherwell District Council (CDC). Woodstock would have to endure the impact of the development with no mitigation or benefits for the residents of Woodstock.

Negotiations to secure S106 contributions may not lead to contributions, such as Outdoor Sports Provision, improving facilities in Woodstock but will be directed elsewhere in Cherwell District. For example, there is no request for a S106 contribution to fund improvements at Woodstock's outdoor swimming pool, something which has been requested by WODC from recent applications within Woodstock.

The above concern that contributions/provisions will not be directed to Woodstock is not speculation and is backup by the information provided within the response from the CDC Landscape Architect dated 12th January 2023.

"There is agreement to be reached on the inclusion of a MUGA. I understand that the developer has concerns about the appropriateness of a MUGA in terms of visual/character and ecological constraints (lighting). I am exploring the option of an offsite contribution for the Parish and await their response."

It is assumed that the Parish is Shipton-on-Cherwell as Woodstock Town Council has not been approached. If this provision is provided in the village of Shipton-on-Cherwell then it is nearly $1^1/2$ miles from the proposal and is unlikely to be used by the new residents, especially when the developer is promoting the development as being part of Woodstock.

This example shows that the impact on Woodstock has not been considered and Woodstock will have to accommodate the additional residents with no additional facilities. This may not be the only occasion as other S106 request from CDC use generic wording and refer to provision in the locality if not on-site, if Woodstock is not confirmed as being in the locality then the provision may go to Shipton-on-Cherwell or Kidlington yet the impact will be in Woodstock.

Ineligibility for Affordable Housing

One of the possible benefits of the development might have been the opportunity for residents in Woodstock and neighbouring villages to apply for affordable housing and to have had the chance to stay living near family and friends. The location of the site in Cherwell would prevent this unless CDC changes its policies. Residents in the neighbouring WODC parishes must be eligible to apply for the affordable housing provision provided on this site.

Lack of Primary School Provision

The developer does not appear to have acknowledged Oxfordshire County Council (OCC) response stating that there is no capacity at Woodstock Primary School and also that it is not possible to for it to be extended any further. OCC also states that the new school planned at Begbroke cannot be relied on as a solution to mitigate the impact.

OCC advised that the developer needs to demonstrate there is a sustainable and viable solution to creating sufficient primary school capacity to mitigate the impact of the development. The response in "Planning Response Note – para 1.31" the developer has decided that "It is the duty of OCC as education authority to consider how school places will be provided." And in para 1.32 they state "As a consequence, the proposed development is not predicted to lead to a significant adverse effect on local school capacity".

OCC has a duty to provide school places but that is for those children already living in the county. A developer is required to provide the infrastructure to mitigate the impact of the development and an application should be refused if the impact cannot be mitigated. A financial contribution cannot mitigate the impact of the development if there is no feasible scheme for it to be spent it on.

Lack of GP Provision

The developer has accepted that Woodstock Surgery is grossly overcrowded and is willing to make a S106 contribution. This will NOT resolve the problem. Woodstock has been trying to find an acceptable site for a surgery for many years and money neither finds a site, nor is likely to be adequate to build a surgery, even if that could be built before the proposed development takes place. In the present and immediate future, there is no way residents in the proposed development can be provided with local medical facilities unless other patients from outlying villages come off the doctors' list. That would be unacceptable as other local facilities – even the new medical centre in Hanborough which is splitting up consulting rooms to see more patients – are already being stretched to their limits by other development happening in his area.

Water and Sewage Capacity

It is stated on page 8 of Utilities Assessment that the network only has sufficient capacity on the current network for 49 residential properties. It is also stated on page 28 of the Flood Risk Assessment and Drainage Strategy Part 1 that the sewage network does not have capacity for the full development.

WTC acknowledged that the developer is willing to pay for the improvements required by Thames Water and that the timing for provision of this infrastructure is still to be agreed with Thames Water. Why should money to upgrade the sewage system because of increased numbers using it due to this development, be taken from money which might be put into affordable home provision? The development cannot go ahead as there are (as already stated), likely to be another 600 homes in Woodstock using the sewage system even before this proposed development would begin.

Sustainability of the Location of Development

The proposed development is not in a sustainable location due to its distance from Woodstock. This seems to be presumed by the suggestion that a community worker be employed to work with the residents in this proposed development to integrate them into local communities. The distance from Woodstock is relevant as the developer is relying on Woodstock to provide most of the amenities required by the residents of the new development apart from providing a community worker for the proposed development residents to help them integrate into the local community — an idea which in itself shows how unsustainable this proposal is in reality.

As identified in the OCC Highways Response and the Transport Assessment the main facilities in Woodstock are approx. 1.6km or 1 mile from the centre of the site and the primary school is 1.4km or 0.85 miles from the centre of the site. WTC assumes that distance from the "centre of the site" is from the centre of the built out development and not just the centre of the whole proposal. Either way there are many properties where the distances are actually further such as for the properties which would be at the North/East side of the site.

OCC response regarding sustainable travel to and from the site was: -

"Although some residents may find such distances walkable, I am not convinced that many would find such journeys manageable especially with bags of shopping. As such, I find that there is likely to be a high dependency on car use which will be exacerbated when considering trips beyond Woodstock, for example to employment areas beyond Woodstock. (see Table 3 of the TA - Journey to work mode share where car trips are 84% and 62% for Cherwell 016 and West Oxfordshire 004 local areas respectively).

On a local front, Woodstock suffers from a lack of sufficient parking provision. It is reasonably feared that residents of the development may add to the already existing parking pressures due to its distance from Woodstock. The applicant is thus requested to explore with the aim of mitigating this issue.

Whilst Woodstock as a community is well served by buses, the development site is remote from these existing connections with the centre of the site being 800 metres from a bus stop (as acknowledged in the Transport Assessment) It is not acceptable for a development of this size to be so distant from a bus route, and therefore a bus service will be required to serve the site directly.

WTC echoes the concerns raised by OCC that walking such a distance from the site into Woodstock (1.6km) would not be manageable for many residents. WTC are also concerned that the distance to the nearest bus stops (800m) may also not manageable by some residents. There will be a high level of car dependency for short journeys, such as into Woodstock let alone slightly longer ones which would be well served by buses if the proposed development were actually nearer relevant bus stops.

This dependency goes against the principles of a sustainable development.

It is also worth noting that the Inspector of the Cherwell Local Plan removed this application site from the draft Local Plan on the grounds that:

"Moreover, while it would bound the A44 and benefit from its proximity to London Oxford Airport and the potential Park and Ride service between it and Oxford, and existing bus services, it is too far away from Oxford to make travelling into the city by means other than the private car sufficiently attractive. Walking would be out of the question, and cycling would only be a reasonable proposition for those who are particularly keen."

In the Travel Plan the developer sets a target to increase cycling from an indicative base of 4.1% to 5.7% by year 5 of the development, that is a 40% increase. How will the developers promote cycling

to Woodstock? Where will the cyclists put their cycles when they reach Woodstock? Woodstock currently has limited cycle parking.

There is no cycle track along the relevant part of the A4095 at the moment and the cycle track to Woodstock along the A44 is on the opposite side of the A44 to this development (although there is a pedestrian crossing close to the exit from the Park View estate into the A44. Other roads a cyclist might use from the proposed development to Woodstock have no cycle tracks and are not suitable for the development of cycle tracks.

We repeat: the development is not in a sustainable location and to prevent the creation of an unsustainable community the application should be REFUSED.

Traffic Impacts

When referring to the access to the development the documentation constantly refers to the access being off the new proposed roundabout on the A4095, Upper Campsfield Road and rarely mentions the site's other access from the A44 through the Park View development.

Within the Travel Plan and the Transport Assessment Section 4.2 Access Strategy para 4.2.1 it states that "Vehicular access to the site will be taken from the A4095 Upper Campsfield Road which will provide a link to the new spine road provided within the adjacent Park View Development." Will all 500 homes really only use this access on to the highways and, if so, it seems a significant increase in traffic on an already awkward bit of the A4095 between the Bladon roundabout and the dog leg crossroads with Shipton Road and Straight Mile.

When reviewing the Transport Assessment, it appears that the developer has not provided any assessments of the traffic that will travel through the adjacent Park View development via the access off the A44 (Cowells Road). There is no recognition of the impact this additional traffic will have on the residents of Park View. Residents of Park View have raised various points to WTC including that when they moved into the development they were not made aware that Cowells Road was proposed to become a new access route to a neighbouring development.

WTC has concerns that this route will become a rat run with drivers cutting through Park View rather the going via Bladon Roundabout to access the A4095 or A44 depending on direction of travel.

WTC is of the strong opinion that an additional traffic assessment is needed to cover the impact of the proposed development on Cowells Road. How will rat running through the site be prevented?

Impact of the Development on the Surrounding Area

Although, both English Heritage and CDC Landscape Officer have no objections to the proposal, previous comments regarding the impact of the development on the local landscape and the World Heritage Site still stand.

Indeed, it is perhaps surprising that there is no concern from those consulted about heritage when the site includes the buried remains of a Roman villa and only a road and a field separate it from the listed wall of the World Heritage Site of Blenheim Park and Palace.

ICOMOS commented over the 2017 approval by WODC for 300 homes on what is now becoming Park View site as follows:

'In our letter of 27th July 2016 we commented on this application for the development of housing on a site east of Woodstock and in conclusion said that and we considered that the application site should remain undeveloped.

'We also said that the concerns raised by the application would be greatly increased by any future attempt to resurrect larger-scale development proposals of the kind for which consent

was refused in September 2015 and which we strongly opposed. We thus urged that any decision to approve the current application should be taken **not as a precedent but as allowing the existing settlement to be satisfactorily terminated against an historic boundary.**Beyond this, we also considered that a halt should be called to all further development before progressive salami-slicing of the remaining open land results over time in its entire loss.

'Whereas a medium size housing development such as proposed (ie. 300 homes at Park View) would cause harm to the setting of Blenheim, it is undeniably the case in our view that any sequential applications for developing larger parts of the setting could have much more major cumulative adverse impacts on the setting of Blenheim and on its authenticity in terms of how the estate is approached and perceived. The approval of one site should not be seen as justification for approving other similar applications on adjoining sites. The wider setting of Blenheim has a coherence, and a clear historical relationship with the land within the walled grounds, and both of these aspects need to be respected in relation to any further consideration of housing developments'.

We believe these statements from the authority overseeing World Heritage Sites in UK are still valid.

In addition to these statements we would also like to bring to your attention part of the recent objection from West Oxfordshire District Council on this proposal: -

"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 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"

It should also be noted that West Oxfordshire District presented their objections to the site being included in Cherwell Local Plan Partial Review at the Examination in Public and that this view was accepted by the Planning Inspector examining the partial review.

Also, the Planning Inspector examining the West Oxfordshire Local Plan made comments regarding the amount of development that Woodstock could sustain. The inspector comments were: -

There is an identified need for 15,950 new dwellings in the district (including in respect of Oxford City's unmet needs). Although it would be possible to provide for this without any new housing at Woodstock, the town is an identified Rural Service Centre with a good range of local facilities and excellent public transport links with Oxford. In my judgement the benefit of providing for around 600 dwellings (less than 4% of the plan's overall housing requirement) in this sustainable location represents clear and convincing justification for the proposed housing development, bearing in mind the importance of the nearby heritage assets and the level of harm which would be likely to be caused to them."

The 600 houses have been or will be provided through the 3 allocated sites identified in the West Oxfordshire Local Plan and this proposal is not one of these allocations.

Both of these inspectors' views should not be ignored and should be taken it to account when considering the proposal.

In addition to the previous comments WTC would like to bring to CDC attention that this site is the remaining green buffer between the extensive development that is occurring or being proposed along the A44 corridor from Pear Tree Roundabout to the Bladon Roundabout.

When travelling north along the A44 from Yarnton there are plans for more housing at Yarnton and Begbroke, also the fields closer to Woodstock are currently included in the Botley West Solar Farm proposal and there is also a plan for a Park & Ride near Bladon Roundabout. All this additional development will create greater urbanisation of the area and coalescence off the various areas along the A44.

The proposed development will remove the final green buffer in the area. It will significantly impact the character and appearance of area and, should the proposals mentioned above occur, then the development will remove the final physical separation between Kidlington and Woodstock.

It is also worth noting again that the Inspector of the Cherwell Local Plan removed this application site from the draft Local Plan on the grounds that:

"Its further extension in a south-easterly direction 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."

To prevent Woodstock from losing its unique identity, to protect the setting of the WHS and to maintain the green buffer between Woodstock and Kidlington the application MUST BE REFUSED.

Town Polls

WEST OXFORDSHIRE DISTRICT COUNCIL

TOWN POLL Town of Woodstock

DECLARATION OF RESULT OF POLL

Date of Poll: Thursday 14 April 2016

I, Paul Cracknell, being Deputy Returning Officer at the above poll, do hereby give notice that the number of votes recorded for each answer to the said question is as follows:-

Question	Answer to the said question Yes/No	Number of Votes
"Do you wish for the green fields including agricultural land of the South East of Woodstock (also	YES	411
known as, or including, or related to the so-called Land East of Woodstock' andler 'Woodstock East') to be protected from development and urban sprawl	NO	73
(RE: the Local Plan)?"		

The number of ballot papers rejected was as follows:-	Number
(A) Want of an official mark	0
(B) Voting for more than one answer	0
(C) Writing or mark by which voter could by identified	0
(D) Being unmarked or wholly void for uncertainty	0
TOTAL REJECTED	0

ELECTORATE: 2542 BALLOT PAPERS ISSUED: 484 TURNOUT: 19.04%

Dated: 14 April 2016

Woodgreen Witney Oxfordshire OX28 INB

PAUL CRACKNELL Deputy Returning Officer

Printed and Published by the Returning Officer

WEST OXFORDSHIRE DISTRICT COUNCIL

TOWN POLL

Town of Woodstock

DECLARATION OF RESULT OF POLL

Date of Poll: Thursday 6 November 2014

I, Keith Butler, being Returning Officer at the above poll, do hereby give notice that the number of votes recorded for each answer to the said question is as follows:-

Question	Answer to the said question Yes/No	Number of Votes
"Do you oppose any development or urbanisation on green fields abutting and surrounding our town	YES	544
of Woodstack?	NO	92

The number of ballot papers rejected was as follows:-	Number
(A) Want of an official mark	
(B) Voting for more than one answer	
(C) Writing of mark by which voter could by identified	I
(D) Being unmarked or wholly void for uncertainty	
TOTAL REJECTED	l

ELECTORATE: 2539; BALLOT PAPERS ISSUED: 638; TURNOUT: 25.13 %

Dated: 6 November 2014

Woodgreen
Witney
Oxfordshire
OX28 INB
KEITH BUTLER
Returning Officer

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