

CAMPAIGN FOR THE PROTECTION OF OLD WOODSTOCK.

OBJECTION TO THE PLANNING APPLICATION ON BEHALF OF BLENHEIM ESTATE FOR UP TO 500 DWELLINGS ON LAND SOUTH OF PERDISWELL FARM (25/01510/OUT).

1. The Campaign to Protect Old Woodstock (C-POW) was formed in 2019. We are an informal organisation, with an extensive group of supporters, who are residents of the town. We are a self-funded, voluntary body. We do not have the resources to employ professionals. We have taken the trouble to study and understand the planning system and have extensive knowledge and experience of the Woodstock area and its recent planning and development.
2. Our initial objective was to oppose the planning application by Blenheim Estate (Blenheim) to build 180 dwellings at the East of Hill Rise site in Old Woodstock (22/00189/FUL). That site had been allocated in the West Oxfordshire Local Plan 2031 (WOLP31) for 120 dwellings. We appeared at the appeal lodged by Blenheim against the refusal of that application by West Oxfordshire DC (WODC).
3. We have subsequently continued our activity to oppose further inappropriate development of Woodstock, concerned about the effects this would have on the town, its services and environment and the setting of the internationally significant Blenheim Palace World Heritage Site (WHS).

4. In this capacity we have objected to various proposals for housing development on the field which is the subject of this application. In particular, we objected to the application made by Blenheim in 2022 (22/01715/OUT) and made representations in respect of the allocation of this site in both the Regulation 18 (2023) and Regulation 19 (2024) drafts of the Cherwell DC (CDC) Local Plan Review which is currently underway.

5. In respect of the 2022 application we also made, in 2023, representations to the Secretary of State for Levelling Up (SoS) that the Application should be called in for decision and engaged in dialogue with representatives of the SoS in respect of this matter. The 2022 application was withdrawn by Blenheim in July 2023, having not been determined. CDC has the various objections and representations we made to it. If CDC has not been supplied with it by the SoS, we can provide the document upon which our call in request was made.

6. Much of this objection is based upon our submission in respect of the CDC LP Review 2042 Regulation 19 Proposed Submission Consultation published in December 2024. We made this on 21 February 2025. Subsequently, on 3 April 2025, we updated our submission with a supplementary representation based on information which had become available since our original submission. Most importantly, this related to a Technical Review published in February 2024 by the International Council on Monuments and Sites (ICOMOS), an official advisor to UNESCO, about the impact of proposed housing developments around Woodstock, particularly on the

Blenheim Palace World Heritage Site. That such a Technical Review was commissioned (see Section 1 Background) suggests there was a need for advice in addition to that available from Historic England. The Review considered the impact of four sites, all brought forward by the Blenheim Estate, including the land subject to this application, which was then the subject of the previous Perdiswell Farm application made on behalf of the Blenheim Estate.

7. We know from WODC staff that they were in possession of this document in April 2024, but were unable to share it at that time. It was subsequently submitted to PINS as an Appendix to the Relevant Representations in respect of the Botley West Solar Farm (BWSF) DCO Examination by both WODC and Historic England (PINS BWSF website; RR-1102 and RR-0398).
8. We do not know when CDC came into possession of this document, but we note that it was not mentioned in the Regulation 19 Draft LP published in December 2024. Given that CDC and WODC have been collaborating in respect of BWSF it seems unlikely CDC officers were not aware of it at that time.
9. The papers prepared by officers for the CDC Executive Committee held on 1 July 2025 unexpectedly recommended submitting a revised version of the Regulation 19 LP to PINS for Examination, even though it had been the Council's previously stated intention to submit the December 2024 version along with representations received upon it. Despite being aware of the ICOMOS Review and referring to it in the papers for this Executive meeting, KID H1 remains in that plan. The changed

text now associated with KID H1 in that draft of the LP does not provide the analysis the ICOMOS Review suggested was necessary. We believe that analysis is fundamental to a proper understanding of the impact of this development on the WHS. It has been started by WODC (see below).

10. In summary, our representations in respect of the Regulation 19 LP were that the Plan was unsound, as KID H1 is in breach of other significant policies in the Plan. The amendments proposed to the CDC Executive for its meeting on 1 July 2025 do not affect that characteristic of the Plan which we will still believe is made unsound by the inclusion of KID H1, a view which was not reported to the CDC Executive in Appendix 7.

11. It is of fundamental importance to any decision to allocate or approve an application on this site to recognise that its impacts will fall largely on the town of Woodstock which is in WODC. Both WODC and Woodstock Town Council have consistently and strongly objected to the allocation of, or granting permission for, dwellings on this site. We have been hoping CDC officers and members would accept that the local officers and representatives of Woodstock have a better understanding of those impacts than they have. There is, of course, no Councillor representing Woodstock on the CDC to explain this impact or consult with the existing residents. Sadly, it seems that in the light of the papers put to the CDC Executive for its meeting on 1 July 2025, the CDC officers have decided their more limited knowledge of this part of WODC is sufficient for them to disregard the views of those legally responsible for it.

12. Based upon our detailed investigation of the various proposals for housing development on this site we believe this application should be refused on the following grounds.

13. Approving it would pre-empt the independent examination of the Draft LP by PINS to test its soundness with the inclusion of KID H1, as well as the specific suitability of that site. This is particularly significant given the objection by WODC to the inclusion of KID H1. Currently, CDC anticipates this application being determined by 29 September 2025 and the LP Examination starting by the end of July, with the submission of the latest (July 2025) revision of the Plan to PINS. The recently updated Local Development Scheme shows the Hearings element of the Examination taking place in December 2025/January 2026. It is clear, therefore, that CDC feels it appropriate to decide this application before the LP process is complete, despite the objection by WODC to both the previous application on this site and KID H1.

14. As described in detail in our submission on the Regulation 19 Draft LP published in December 2024 it is quite clear from its management of the 3 large sites on the edges of Woodstock allocated to Blenheim Estate in the current West Oxfordshire Local Plan (WOLP31), that the Estate is more interested in building a land bank than it is in building houses. Even if permission for this site were to be granted it seems unlikely that any houses would be built on it for many years. The Estate already has permission of over 400 houses which remain to be built on the 3 sites which were allocated in the WOLP in 2018

after being identified years before that, as well as 150 houses granted permission on an unallocated site in Long Hanborough which has yet to show any sign of development, even though the S106 agreement was signed in February 2023 (22/01330/OUT) . Granting permission on this site would simply add to CDCs problem in getting houses built on allocated and permitted sites. It is extremely unlikely to ease the Council's land supply problems and would serve to make the Council look rather gullible in the light of approving a *Housing Delivery Action Plan* at its Executive meeting on 10 June 2025 in response to the serious problem it has converting planning permissions into houses being constructed.

15. In the light of the ICOMOS 2024 Review there can be no doubt that the setting of Blenheim WHS is threatened by this development. The technical studies recommended by ICOMOS have not yet been undertaken. At a meeting of its Uplands Planning Committee on 17 March 2025 WODC agreed that "*Officers would meet with representatives of Blenheim Estate to discuss the ICOMOS findings and how this would feed into a review of the (WHS) Management Plan, Cherwell's Local Plan and West Oxfordshire's Local Plan.*" We believe a responsible Local Authority would wish to see the results of that work before suggesting or supporting development on this site. It is, of course, remarkable, but sadly not surprising, given its actions in recent years that the Blenheim Estate trustees, long term guardians of the WHS, seem entirely uninterested in the views of ICOMOS or WODC in this matter and are focussed instead on pre-empting the local planning process in order to take advantage of CDC's current land supply shortage. We

suggest that Blenheim has little intention to help CDC solve its 5 year land supply shortage and will simply add a permission on this site to its long term land bank.

16. Blenheim also claims in its these application documents (*Planning Statement p27*) that the development would result in a significant heritage benefit, by helping to meet the financial requirements of maintaining the WHS. This is not unusual; the Estate claims this in respect of all significant applications it makes. However, it has never signed a legal agreement to use funds from any commercial development for that purpose. The submission by Begbroke and Yarnton Green Belt Campaign to the BWSF Examination (*Comments on the written summary of the evidence provided by Dominic Hare (Blenheim CEO) in the Open Floor Hearing on 13 May 2025*) explains in detail how the Estate attempts regularly to mislead the planning authorities in respect of this matter. This is well understood by or local District Councillors. Until and unless some form of legal agreement is attached to a permission no such putative benefit can be taken into account in the planning balance. It is interesting to note that the ICOMOS Technical Review indicates (bottom page 8) *“in the case of World Heritage , OUV is irreplaceable and cannot be offset”*.

17. Development of this land would serve to further reduce the already diminished, but important gap, between Oxford and Woodstock along the A44 corridor. The current CDC LP identifies significant areas along the A44 corridor for development. If approved, BWSF would remove further

substantial areas. Various BWSF documents deal with this matter, including RR-0092 Section 5.

18. The infrastructure of Woodstock could not cope with another c.1250 people who would live on this site if developed. These new residents would expect to find their basic services in their home town, which they would believe to be Woodstock. Unfortunately, they would be disappointed. The current WOLP31 allocated 3 significant housing sites in the town in 2018. As the Plan documents show, particularly the LP Inspector's report, when these allocations were made the primary consideration was their environmental capacity. Little consideration was given to whether the services of the town could cope with an increase of c.40% in its population. However, after the Plan was adopted in September 2018, this problem became apparent and, led by the Town Council, a report into the infrastructure deficit was produced in 2019, "*Woodstock and Community Infrastructure Delivery Plan*". Top of the lengthy list of infrastructure problems identified in this document was the inadequate doctors' surgery. Six years later the surgery has not been materially improved and, by the admission of the current doctors and the NHS, will not be able to cope with the population which will come to the town when the current WOLP31 allocations are completed. Our MP, Calum Miller, raised this issue in Parliament on 7 January 2025, describing the Woodstock surgery as "*not fit for purpose*". There is little chance the residents of another 500 houses will find health or education facilities in the town, let alone be able to park their cars in the town centre. Most will want drive into the town as the walk from the site is likely to take, on average,

over 20 minutes, even though the CDC Draft LP is built upon the idea of sustainable development.

19. Until recently CDC has only had experience of dealing with Blenheim Estate in respect of this site. However, the approach of the Estate in respect of BWSF has illustrated to those not familiar with its development strategy, including CDC, that it appears to have little regard for protecting the setting of the WHS for which it is responsible. Monetising the value of the land which comprises that setting seems of greater importance to it.
20. The Estate is also cavalier in its assertion that the money generated from the developments it proposes is needed to maintain the WHS. This is never detailed, let alone proven or documented and its own publicity suggests major improvement schemes can and are funded from the payments made by visitors to the WHS, including those attending the many and varied events promoted there.
21. The Estate owns most of the land on the fringes of Woodstock and is keen to have it allocated and/or permitted for housing development. However, despite buying Pye Homes, a local house building company, in 2019 the Estate has produced less than half the houses on the 3 sites in Woodstock allocated in WOLP31. Over 400 remain to be built.
22. We suggest it would not be in the interest of CDC to give Blenheim Estate the chance to add to its land bank by permitting the development of this site. Its actions in recent

years leave little room for doubt that its managers care more about enhancing the long term value of the estate land than protecting the WHS or helping the local districts or the national Government increase housing supply.

23. We also suggest that before CDC allocates further land to Blenheim for housing it should demonstrate its capability as a volume house builder by completing the 600 permissions it still has in the local Woodstock/ Hanborough area. Given the Park View 300 house development is not yet complete, over 7 years after it received planning permission, it might be expected that this will take c15 years. With this timescale there is no need to bypass the CDC LP making process, which according to the July 2025 Local Development Scheme will be complete within a year.

24. Finally, we note the inadequate summary of the 2020 LP Inspector's report in respect of this site in Appendix 7 (page 252) of the papers presented to CDC's Executive on 1 July which omitted to record that he catalogued a range of problems with the site other than its lack of proximity to Oxford, ending with the observation that: "*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 on the Policy PR10 Policies Map.*" (Para 54). This contortion is unavoidable and has been carried forward to both South of Perdiswell Farm applications and KID H1 in the current Regulation 19 Local Plan.