

Formal Objection to Planning Application 25/01510/OUT (KID1)

Submitted by Woodstock Town Council

Woodstock Town Council submits this comprehensive and detailed objection to planning application 25/01510/OUT for up to 500 dwellings and associated infrastructure on land south/southeast of Woodstock (KID1 site), within Cherwell District but immediately abutting Woodstock (West Oxfordshire).

This objection is grounded in the National Planning Policy Framework (NPPF, December 2024), the Cherwell Local Plan Review 2042, the West Oxfordshire Local Plan 2031, the Woodstock Neighborhood Plan, the Environment Act 2021, and the Blenheim Palace World Heritage Site Management Plan. It addresses policy non-compliance, cross-boundary impacts, infrastructure, biodiversity, heritage, and deliverability in depth.

1. Location, Settlement Pattern, and Planning Policy Context

A. Site Isolation and Functional Disconnection

- The proposal for 500 homes is described as “*immediately adjacent*” to Park View, but in reality lies at least 250 meters from the edge of Woodstock, separated by a greenfield containing the nationally important Blenheim Roman villa and other archaeological features.-
- The nearest community, Upper Campsfield, is a tiny cluster of 10 homes across the A4095. The development would function as a new, isolated village on productive farmland, with no meaningful relationship to Kidlington (over 5 miles away), despite being in Cherwell District.
- The centre of Woodstock is approximately 1,300m from the centre of the proposed site; the nearest bus stop is 800m away, with no safe or attractive pedestrian or cycling links.
- This pattern of isolated development is **contrary to the National Planning Policy Framework (NPPF, Dec 2024) paras. 16, 79, 105**, which require development to be well-related to existing settlements and to of an appropriate sizescale and type that would help to reinforce/create the service centre and promote sustainable patterns of growth.
- Both the **Cherwell Local Plan Review 2042** and **West Oxfordshire Local Plan 2031** direct significant growth to existing settlements. The **Cherwell Plan** puts the focus of development on Bicester, Banbury, and Kidlington. In the **West Oxfordshire Local Plan 2031**, Woodstock is seen as a rural service centre where development should be of an appropriate scale and type that would help to reinforce the service centre role’ (Policy EW10).

B. Loss of Green Gap and Community Identity

- The proposal would fill the last remaining open land between Woodstock and Bladon, erasing the historical and physical distinction between two communities that have maintained separate identities for over 900 years, each with its own council and places of worship.
- This is **contrary to WODC Policy OS2** and NPPF para. 79, both of which stress the importance of maintaining settlement separation and community identity.

C. Cross-Boundary Planning Failure

- The development is in Cherwell but would rely entirely on Woodstock (West Oxfordshire) for services, infrastructure, and community integration. There is no evidence of a binding cross-boundary agreement or joint infrastructure planning, in breach of the **Duty to Cooperate** (NPPF para. 24, 27–28; see also Oxfordshire Plan 2050 and Duty to Cooperate Scoping Document).
- West Oxfordshire District Council has formally objected, citing the site’s unsuitability, previous Planning Inspector rejection, and the inability of local services and infrastructure to cope with further growth.

2. Housing Numbers, Cumulative Impact, and Infrastructure Overload

A. Existing and Approved Housing in Woodstock

- In the development of the **West Oxfordshire Local Plan** the Planning Inspectorate report to West Oxfordshire District Council by Malcolm Rivett BA (Hons) MSc MRTPI in August 2018 recognised *“the benefit of providing for around 600 dwellings”*.
- Woodstock currently has approximately **1,700 homes**. Recent and approved developments include:
 - **Park View:** 300 homes (78 still under construction)
 - **Hill Rise:** 180 homes (just begun)
 - **Banbury Road:** 235 homes (outline permission granted; Local Plan Inspector reduced this from an initial higher number for sustainability reasons).
- These sites alone will add **over 700 new homes**, already exceeding the **600-home allocation for Woodstock in the West Oxfordshire Local Plan 2031**.
- Adding a further 500 homes would more than double the planned growth for Woodstock, fundamentally undermining the settlement hierarchy and infrastructure planning of both Local Plans.:-
- The proposed development is in no way *“a reasonable scale of development”* or can it be said that *“Woodstock is assessed as being of an appropriate scale to support development in order to deliver on its housing needs”* as mentioned in the planning proposal’s supporting documents.

B. Infrastructure Deficits

- **Healthcare:** Woodstock's GP surgery is at capacity, with no site agreed for expansion after a decade of discussion. The Inspector for the Hill Rise appeal noted there would be no medical facilities for some new residents, and neighboring villages cannot absorb the overflow.
- **Education:** Woodstock Primary School is at or beyond capacity, with no room for further expansion. There is also stated need to accommodate pupils from Begbroke due to lagging school provision there. The development would exacerbate this deficit and force children to travel further afield, increasing car journeys and undermining sustainability objectives.
- **Parking:** Parking in Woodstock is already severely constrained and impacts upon the town's commercial activities; the new parking scheme does not increase capacity, and the proposed development would inevitably exacerbate this problem.
- **Sewage:** Critically Woodstock's sewage treatment works is already under capacity, with Thames Water confirming no spare capacity even before current developments are completed. The alternative of connecting to Church Hanborough (or even Cassington) is not viable due to its own capacity and flood risk issues. In the Flood Risk Assessment document, Thames Water has stated (5 June 2024) that this sewage treatment works does not currently have capacity for the development *'the receiving network is served by Church Hanborough STW and there isn't capacity at the works to serve the development currently but is currently being investigated to upgrade the works.'* It should also be noted that the *'current investigation'* has been ongoing for several years. No new homes should be occupied until adequate sewage infrastructure is operational, as required by Cherwell Local Plan Policy CSD9 and WODC Policy OS4.
- **Transport Traffic, Access, and Safety:** The application's reliance on a proposed park-and-ride at Bladon Roundabout is unsound, as the land is not controlled by the applicant and no progress has been made after a decade of discussion. Furthermore residents of this development are highly unlikely to make use of such a park and ride.

Access via the A4095 near the Shipton Road–Long Mile dog-leg is hazardous, with recent fatalities near the Bladon roundabout. Cowells Road risks becoming a rat-run. The nearest bus stop is 800m from the site centre; most local roads are not safe or attractive for cycling or walking. Increased car dependency is inevitable given the site's isolation and lack of sustainable transport links.

The development would be car-dependent, contrary to climate and sustainability objectives in both Local Plans and the NPPF. Without deliverable sustainable transport measures, the proposal will increase car dependency and congestion, contrary to both local and national policy.

C. Social and Economic Impacts

- The affordable homes would be allocated to Cherwell residents, not Woodstock or West Oxfordshire. Construction jobs would be temporary and not necessarily benefit the local workforce.
- Retail benefit to Woodstock is likely to be minimal due to the site's isolation; S106/CIL monies would go to Cherwell while Woodstock/West Oxfordshire bear the burden of increased pressure on inadequate infrastructure.

3. Biodiversity, Green Infrastructure, and Environmental Harm

A. Mandatory Biodiversity Net Gain (BNG) Not Demonstrated

- The **Environment Act 2021** requires all major developments to deliver a minimum 10% net gain in biodiversity, calculated using the statutory Biodiversity Metric, and secured for at least 30 years.
- The application fails to:
 - Provide a statutory biodiversity metric quantifying baseline habitat value and net gain.
 - Set out a credible biodiversity gain plan for on-site or off-site habitat creation or enhancement.
 - Secure long-term management and monitoring of biodiversity gain.
 - Address the mitigation hierarchy (avoid, mitigate, compensate) as required by law.
- **Cherwell Local Plan 2042 Policies CSD11, CSD12, CSD14 and WODC Policy EH3** require measurable net gain, protection of priority habitats, and enhancement of ecosystem services.
- The site forms part of a green corridor south of Woodstock, providing habitat connectivity and ecosystem services. The development would result in direct loss of semi-natural habitat, hedgerows, and mature trees, with insufficient evidence of mitigation or compensation. Since nearby development began, there has been a marked decline in barn owls, hedgehogs, and deer in the area.

B. Long-Term Biodiversity Monitoring and Enforcement

- There is no explicit evidence in the application that long-term (30-year) management, monitoring, and funding of new/enhanced habitats is secured.

C. Green Infrastructure and Connectivity Risks

- As the Landscape Parameter Plan and Environmental Statement does not demonstrate how green corridors will be retained, enhanced, and connected to the wider ecological network, the proposal risks habitat fragmentation and loss of ecosystem services.

4. Heritage and Landscape Impact

A. Blenheim Roman Villa

- The Blenheim Roman villa, located approximately 200m northeast of Littlecote, is a nationally recognized archaeological site. A very limited excavation of the site in 1985 revealed well-preserved

walls and other features, set within an enclosure complex, with the potential for floors to be preserved at greater depth than has yet been explored, but in fact relatively little is known for certain about the extent of this complex. Remains of a possible Roman village were found across the A4095 when the Woodstock Road was being widened. (Simon Preston: Thames Valley Archaeological Services 2014 Land at Shipton Road, Woodstock).

- The proposed development lies in close proximity to this invaluable archaeological site. Construction activities, including groundworks, infrastructure installation, and increased traffic, pose a tangible risk of physical disturbance and irreversible damage to the villa's remains and its associated field system.
- Beyond direct physical impacts, the development threatens to alter the setting and landscape context of the villa, which is integral to understanding its historical function and significance. Any harm to its fabric or setting would represent a significant loss to the region's archaeological record and national heritage.
- The NPPF (paras. 207–208) and guidance on the protection of archaeological sites require that both scheduled and unscheduled remains of national and local importance be preserved in situ wherever possible, and that their settings be respected.

B. Blenheim Palace World Heritage Site (WHS)

- The site abuts the Blenheim Palace WHS, WHS with Palace, Park and surrounding Wall all listed as of Outstanding Universal Value (OUV) are separated only by the A44 and Campsfield Wood. Both **Historic England** and **ICOMOS** have previously objected to similar proposals, citing irreversible harm to the Outstanding Universal Value (OUV) and setting of the Palace. A letter in December 2017 from Peter Marsden, Chair, ICOMOS-UK World Heritage Committee stated in relation to the approval of what is now the developing Park View site 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'*. The letter further states: *'Whereas a medium size housing development such as proposed (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 a 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'*.
- The WHS Management Plan and **Operational Guidelines for the Implementation of the World Heritage Convention 2015** require that new development must protect and, where possible, enhance the attributes of the site, including its historic landscape, parkland, and views.

- Blenheim does not have a buffer zone but the Operational Guidelines are clear that this should not lessen the protection of the setting of the site. Para 112 states 'This approach goes beyond the property to include any buffer zone(s) as well as the broader setting. The broader setting may relate to the property's topography, natural and built environment and other elements such as infrastructure, land use patterns spatial organisation and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Management of the broader setting is related to its role in supporting the Outstanding Universal Value'.
- The farmland and parkland surrounding Blenheim are essential to understanding and appreciating its historic character. Development would urbanize this landscape, eroding the historic and rural character of Woodstock's southern gateway, and removing the distinction between Woodstock and Bladon.
- ICOMOS has warned that sequential developments in the setting of Blenheim risk cumulative and major adverse impacts on the WHS's authenticity and coherence. The remaining open land should not be "*salami-sliced*" by further development.
- The application fails to propose a buffer zone, as recommended by ICOMOS and required by NPPF para. 208 and the WHS Management Plan.

5. Governance, S106, and Cross-Boundary Funding

A. S106 and Infrastructure Funding Gaps

- The development is in Cherwell District, but its primary impacts are on Woodstock and West Oxfordshire. S106 funds must be negotiated with both Cherwell and West Oxfordshire District Councils to ensure fair and effective mitigation of infrastructure pressures. If S106 is only negotiated with Cherwell, Woodstock will bear the burden of infrastructure strain without compensation, violating the principle of fair mitigation and the requirements of both councils' Developer Contributions SPDs.

6. Deliverability, Prematurity, and Reasonable Alternatives

A. Prematurity and Overdevelopment

- As stated earlier, the scale of development far exceeds Woodstock's allocation in the West Oxfordshire Local Plan and may be premature relative to the emerging Cherwell Local Plan, undermining the plan-led approach and the principle of directing growth to sustainable, suitable locations.
- The build-out of current sites in Woodstock has been slow (Park View: 30 units/year, Hill Rise: 60 units/year), meaning that the completion of existing permissions will not occur until 2045, well

beyond the life of the emerging Cherwell Local Plan. KID1 cannot be delivered within Cherwell's plan period, rendering it unsound for meeting Cherwell's housing need.

b. Viable Alternatives

- The Moors site in Kidlington is available and deliverable within the plan period, avoiding the heritage, biodiversity, and infrastructure conflicts of KID1.

8. Climate Change Mitigation and Sustainable Building Practice

A. Current Deficiencies

- The proposal lacks robust, enforceable climate mitigation measures. It does not commit to best-in-class standards for energy efficiency, low-carbon construction, or climate resilience, and fails to align with Cherwell's and West Oxfordshire's net-zero objectives.

9. Conclusion and Formal Request for Refusal

A. Conclusion

This proposal would **more than double Woodstock's planned housing growth**, overwhelming local infrastructure, damaging heritage assets of national and international significance, eroding community identity, and failing to deliver on biodiversity, climate, and sustainability objectives. It is **contrary to the NPPF, the Environment Act 2021, , the Cherwell and West Oxfordshire Local Plans, and the Blenheim Palace WHS Management Plan, and the Future Homes Standard 2025**. Approval would set a **damaging precedent for cross-boundary planning, biodiversity law, and the protection of our historic and natural environment**.

B. Formal Requests for Refusal

This proposal represents unsustainable, unplanned, and harmful overdevelopment, with severe infrastructure, heritage, biodiversity, and governance consequences. It is contrary to adopted and emerging development plans, national policy, and statutory requirements. Approval would set a **damaging precedent for cross-boundary planning, and the protection of our historic and natural environment**.

Signed



Town Clerk

On behalf of Woodstock Town Council

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