# **Woodstock Town Partnership**

**Our vision for the future of Woodstock is:**

**A beautiful and safe town set within accessible countryside**

**A thriving economy based on our strengths as an attractive visitor destination**

**A place with outstanding facilities for everyday life as well as for special events**

## A diverse community active in influencing its own future

### Chair: Colin Carritt 83, Manor Road Woodstock OX20 1XS

 29th January 2015

Andy Preston

Public Protection and Development Management

Cherwell District Council

Bodicote House

Banbury

OX15 4AA

Dear Sir

Planning Application 14/02004/HYBRID: Land South of Perdiswell Farm, Shipton Road, Shipton on Cherwell and Woodstock.

Woodstock Town Partnership is an informal group consisting of residents, local councillors and representatives from business, public services, the voluntary sector and Blenheim Palace (although on this issue Blenheim have stood aside for obvious reasons). Its purpose is to bring together the various strands of public and commercial life in Woodstock for the promotion and protection of our unique town. Its objective has been to develop a vision for the future of the town (reproduced on this letterhead) that will sustain it and protect its values in the future

The Town Partnership recognises the inevitability of new development in Woodstock and welcomes it where appropriate in scale and design and when real benefits for the town can be demonstrated and delivered. Woodstock is in a unique situation in that The Blenheim Estate owns the majority of land both within and surrounding the town and therefore controls the supply of land for future development. The relationship between The Estate and the community of Woodstock has shaped the evolution of the town and will continue to do so. We believe that this landowner has as much responsibility towards the internationally-admired town as to the World Heritage Site and should safeguard the character, community and economy of the town through any development that they bring forward.

Woodstock Town Partnership does not believe that these proposals meet these aspirations and that the Blenheim consortium has engaged only cursorily with the townspeople. The level of community engagement has been inadequate and wholly unacceptable for a development of this scale and significance. We feel obliged therefore to object to the planning application currently before Cherwell and West Oxfordshire District Councils on the grounds as set out below.

We understand that until the Council’s Examination in Public has been reconvened and that the present Schedule of Planning Policies (herein after SPP) may not be regarded as robust. Furthermore, the site location, lying where it does, on the periphery of the District and remote from the settlement centres of both Begbroke and Shipton on Cherwell villages, has inevitably led to it receiving scant consideration in the pre-existing Local Plan or in the Cherwell Illustrative Submission to the Examination (herein after CIS). Nevertheless, it must be assumed that, in considering this application, the open countryside to the south and east of Woodstock would be viewed in the same light as other areas of open countryside abutting existing settlements in other parts of Cherwell District.

The Town Partnership has framed its objection with these principles in mind. In addition, given WODC’s decision that all representations should be channelled through Cherwell DC we have also framed our comments around the current planning policies of WODC. Where CDC and WODC policies are reproduced (in part) they are shown in italics with specific issues in bold. The Town Partnership’s responses are shown in bold text and organised under 9 policy themes.

**1 DEVELOPMENT BEYOND THE BUILT-UP LIMITS OF A SETTLEMENT**

***CDC Policy H18 (SPP) states***

*PLANNING PERMISSION WILL ONLY BE GRANTED FOR THE CONSTRUCTION OF NEW DWELLINGS BEYOND THE BUILT-UP LIMITS OF SETTLEMENTS OTHER THAN THOSE IDENTIFIED UNDER POLICY H1[[1]](#footnote-1) WHEN:-*

*(i) IT IS ESSENTIAL FOR AGRICULTURE OR OTHER EXISTING UNDERTAKINGS, OR*

*(ii) THE PROPOSAL MEETS THE CRITERIA SET OUT IN POLICY H6[[2]](#footnote-2); AND
(iii) THE PROPOSAL WOULD NOT CONFLICT WITH OTHER POLICIES IN THIS PLAN.*

***CDC Policy Villages 1 (CIS) states***

*Proposals for residential development within the built-up limits of villages (including Kidlington) will be considered having regard to the categorisation below. Only Category A (Service Centres) and Category B (Satellite Villages) will be considered to be suitable for minor development in addition to infilling and conversions.*

*Category A - Service Villages - Minor Development/Infilling/Conversions only permitted*

*Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (\*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Lower Heyford, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston -on –the-Green (\*), Wroxton, Yarnton*

***WODC POLICY H7 Service Centres states***

*New dwellings will be permitted in the towns and villages in Group C [Woodstock is in this group] in the following circumstances:*

*a) inﬁlling;*

*b) rounding-off within the existing built up area;*

*c) the conversion of appropriate existing buildings; and*

*d) on sites speciﬁcally allocated for residential development in this plan*.

**In respect of CDC policies H18(SPP), Villages1 (CIS) and WODC policy H7 our comments are:-**

**Woodstock is regarded by WODC as a Service Village and it can therefore be assumed that it would similarly be considered by CDC. Clearly, under this policy the present application could not be considered “minor development, infilling, rounding-off, or conversion” and is not on a site specifically allocated for residential development in either plan.**

**The West Oxfordshire Residential Design Guide further classifies Woodstock as a nucleated settlement. In common with most other market towns, this implies a strong element of centrality and that its urban structure and functions are based around long radial routes converging on the town centre for maximum accessibility.**

**2. UNDESIRABLE PRECEDENT**

***WODC POLICY H2 General residential development standards states:-***

*Proposals for additional dwellings (including the conversion of existing buildings), replacement dwellings and extensions or alterations to existing dwellings should not:*

***f) set an undesirable precedent for other sites where in equity development would be difﬁcult to resist and where cumulatively the resultant scale of development would erode the character and environment of the area.***

**We believe that this proposal, located and planned in a void of locally defined policy will create a dangerous precedent for unsuitable development elsewhere**.

**3. LEVEL OF AFFORDABLE HOUSING ON UNALLOCATED LAND**

***WODC POLICY H11 - Affordable housing on allocated and previously unidentiﬁed sites states:-***

***Taking into account the housing needs of the area and subject to any site speciﬁc constraints, an element of affordable housing will be sought as part of residential development schemes on the following basis:***

*a) on land allocated in this plan for residential development or mixed uses including housing; 30% on sites in the towns of Witney and Carterton and up to 50% in the remainder of the District ;*

***b) on unallocated land, which comes forward in accordance with the locational policies of this plan, up to 50% affordable housing will be sought where:***

*i) the site is in Witney, Carterton, Chipping Norton or Eynsham and has an area of 0.5 ha or greater or when 15 or more dwellings are proposed; or ii) elsewhere, when a development of 2 or more dwellings is proposed.*

**The applicant is suggesting 40% affordable housing. We believe this to be inadequate and should reflect the proportion of affordable homes as clearly set out in the Local Plan policy in b) above.**

**4. LOCATION OF RETAIL AND THE VITALITY AND VIABILITY OF THE TOWN CENTRE**

***CDC Policy S29 (SPP)*** *states:
PROPOSALS THAT WILL INVOLVE THE LOSS OF EXISTING VILLAGE SERVICES WHICH SERVE THE BASIC NEEDS OF THE LOCAL COMMUNITY WILL NOT NORMALLY BE PERMITTED.*

***WODC POLICY SH1***

***New Retail Development states:-***

***Proposals for retail development, other than to meet purely local needs, will be located according to the following sequence:***

***1) within the town centres***

*2) on the edge of the town centres*

*3) in out of centre locations that are, or can be made, readily accessible by a choice of means of transport.*

***Proposals for retail and other town centre uses in locations other than town centres will only be permitted where:***

*i) a need for the development has been established;*

*ii) the sequential approach has been followed and there are no suitable sequentially preferable sites available;*

*iii)* ***the development would not harm either directly or cumulatively the vitality and viability of any nearby town centre or planned measures to improve it;***

*iv) the development proposed is appropriate in nature and scale to the location;*

*v) the proposal accords with other policies in the plan with regard to trafﬁc impact, amenity and environment.*

***WODC POLICY SH4***

***Shopping Facilities for the Local Community*** *states:-*

***Proposals for small scale individual shops or groups of shops (Class A1), or other small-scale retail premises to meet the daily needs of the local community will be permitted within towns and villages, provided all the following criteria are met:***

*a) the site would be readily accessible by bicycle and on foot;*

***b) the proposal would not harm the vitality and viability of an existing town centre or an established village centre for shopping;***

*c) there is no detrimental impact on the amenity of occupiers of residential property from noise, fumes, smell, lighting, activity levels or hours of operation at the site*.

**We believe that the addition of a medium sized supermarket as part of this application would harm the vitality and/or viability of existing retail premises in Woodstock Town Centre. We believe such provision within the development site will have an adverse effect on the existing town centre.**

**We would welcome development that encourages more households to use the town centre retail and other facilities. However, we believe that the poor connectivity of this proposal to the existing town and the provision of an on-site local retail outlet are counter-productive to these objectives**

**5. PROVISION OF HIGHWAYS, ENVIRONMENTAL AND COMMUNITY INFRASTRUCTURE**

***CDC Policy TR1 (SPP)*** *states: BEFORE PROPOSALS FOR DEVELOPMENT ARE PERMITTED THE COUNCIL WILL REQUIRE TO BE SATISFIED THAT NEW HIGHWAYS, HIGHWAYIMPROVEMENT WORKS, TRAFFIC-MANAGEMENT MEASURES, ADDITIONAL PUBLIC TRANSPORT FACILITIES* ***OR OTHER TRANSPORT MEASURES THAT WOULD BE REQUIRED AS A CONSEQUENCE OF ALLOWING THE DEVELOPMENT TO PROCEED WILL BE PROVIDED.***

***WODC POLICY BE1*** *states:-*

***Environmental and Community Infrastructure****.*

*Development will not be permitted unless appropriate supporting transport, service and community infrastructure is available or will be provided and appropriate provision has been made to safeguard the local environment.*

*Contributions will be sought from developers and/or landowners in accordance with Government advice.*

***WODC POLICY BE3*** *-* ***Provision for Movement and Parking*** *states, inter alia:-*

 *[…]Proposals will only be permitted if all the following criteria are met:*

1. *safe and convenient circulation of pedestrians and cyclists, both within the development* ***and externally to nearby facilities, with provision to meet the needs of people with impaired mobility as appropriate;***
2. *[…]*
3. *[…]*
4. ***provision for the parking of vehicles, including bicycles and motorcycles, in accordance with the standards in Appendix 2.***

**In respect of CDC policy TR1 and WODC policies BE1 and BE3 we draw to your attention the following.**

**The applicants make much of the ’sustainable’ label for this development. However, we would challenge the credibility of this claim, particularly in relation to its connectivity to the existing town.**

**Pedestrian movement**

**We have concerns that the pedestrian network will not provide for safe or convenient movement, either within the development or externally to nearby routes and facilities. National policy of the NPPF (para 61) and PPG Design (020) also emphasise the importance of clear and direct movement routes in achieving the physical and social integration essential for successful places. The Design PPG states that: “A place should have an appropriate number of routes to and through it, not too many to make it anonymous but enough to allow easy legitimate movement. How direct and understandable these are, how closely they fit with desire lines of travel and how well they connect with each other and destinations will all influence the success of a place.”**

**As a hybrid application, there is little detailed information available. However, the Movement Parameter Plan does not indicate that the PPG guidance has been followed in designing the layout. It is essential therefore that the significant points of connection, via Hedge End/Flemings Road to the north -west and direct access south to the Oxford Road/A44, are drawn across the red line of the site boundary directly into and across the site to provide a clear, direct and legible structure for pedestrian movement.**

**We have no concerns regarding the parking standards in the development itself but we note that no account has been taken in the application of the impacts of car parking in Woodstock Town Centre. If, as the applicants suggest, and the Town Partnership hopes, the development may revitalise the town centre, then additional parking capacity will be essential since availability is already at full capacity. Four recent surveys undertaken by WODC, Oxfordshire County Council, the Town Partnership and Woodstock Town Council have all indicated that parking is already at capacity. Any development beyond general infill and rounding off will put intolerable additional pressure on parking. A substantial investment in town centre parking is essential and without it being included either in the application or within a substantial Section 106 provision, the application should be rejected**.

**We feel that the applicants have given insufficient time and effort to establish what infrastructure the town and community needs and values. The benefits claimed in the Design and Access Statement are unsubstantiated and not based on extensive public engagement.**

**The critical factor for new development is integration and we have severe doubts that the current proposals can deliver both the physical and social integration necessary to make this a successful extension to Woodstock.**

***WODC POLICY BE19 – Noise states:-***

**6. HOUSING AND OTHER NOISE SENSITIVE DEVELOPMENT**

*Planning permission will not be granted for:*

*a) housing and other noise sensitive development if the occupants would experience significant noise disturbance from existing or proposed development;*

*b) development including the use of land, if because of the noise it will create, the occupants of housing and other noise sensitive development would be exposed to significant noise disturbance, unless there is an overriding need for the proposal which cannot be met elsewhere.*

**There is an existing noise problem from Kidlington Airport that will have an adverse effect on the applicants’ proposed development on the land within Cherwell Disrtict.**

**7. DESIGN, CHARACTER AND HISTORIC SETTLEMENT PATTERN**

***CDC Policy C27 (SPP)*** *states: DEVELOPMENT PROPOSALS IN VILLAGES WILL BE EXPECTED TO RESPECT THEIR HISTORIC SETTLEMENT PATTERN*

***CDC Policy C28 (SPP)*** *states: CONTROL WILL BE EXERCISED OVER ALL NEW DEVELOPMENT, INCLUDING CONVERSIONS AND EXTENSIONS, TO ENSURE THAT THE STANDARDS OF LAYOUT, DESIGN AND EXTERNAL APPEARANCE, INCLUDING THE CHOICE OF EXTERNAL-FINISH MATERIALS, ARE SYMPATHETIC TO THE CHARACTER OF THE URBAN OR RURAL CONTEXT OF THAT DEVELOPMENT. IN SENSITIVE AREAS SUCH AS CONSERVATION AREAS, THE AREA OF OUTSTANDING NATURAL BEAUTY AND AREAS OF HIGH LANDSCAPE VALUE, DEVELOPMENT WILL BE REQUIRED TO BE OF A HIGH STANDARD AND THE USE OF TRADITIONAL LOCAL BUILDING MATERIALS WILL NORMALLY BE REQUIRED.*

***CDC Policy ESD 16 (CIS)*** *states:-*

***The Character of the Built and Historic Environment***

*Successful design is founded upon an understanding and respect for an area’s unique built, natural and cultural context. New development will be expected to complement and enhance the character of its context through sensitive siting, layout and high quality design. All new development will be required to meet high design standards. Where development is in the vicinity of any of the district’s distinctive natural or historic assets, delivering high quality design that complements the asset will be essential.*

*New development proposals should:*

* ***Respect the traditional pattern of routes, spaces, blocks, plots, enclosures and the form, scale and massing of buildings. Development should be designed to integrate with existing streets and public spaces, and buildings configured to create clearly defined active public frontages***
* ***Promote permeable, accessible and easily understandable places by creating spaces that connect with each other, are easy to move through and have recognisable landmark features***
* ***Demonstrate a holistic approach to the design of the public realm to create high quality and multi-functional streets and places that promotes pedestrian movement and integrates different modes of transport, parking and servicing. The principles set out in The Manual for Streets should be followed***
* ***Be compatible with up to date urban design principles, including Building for Life, and achieve Secured by Design accreditation***

***WODC POLICY BE2*** *states:-*

***General Development Standards***

*New development should respect and, where possible, improve the character and quality of its surroundings and provide a safe, pleasant, convenient and interesting environment.*

*Proposals for new buildings and land uses should clearly demonstrate how they will relate satisfactorily to the site and its surroundings, incorporating a landscape scheme and incidental open space as appropriate.*

*A landscape scheme accompanying detailed proposals for development should show, as appropriate, hard and soft landscaping, existing and proposed underground services, a phasing programme for implementation and subsequent maintenance arrangements.*

*Proposals will only be permitted if all the following criteria are met:*

*Quality of Development and Impact upon the Area:*

1. *the proposal is well-designed and respects the existing scale, pattern and character of the surrounding area;*
2. *new buildings or extensions to existing buildings are designed to respect or enhance the form, siting, scale, massing and external materials and colours of adjoining buildings, with local building traditions reflected as appropriate;*
3. *the proposal creates or retains a satisfactory environment for people living in or visiting the area, including people with disabilities;*
4. *existing features of importance in the local environment are protected and/or enhanced;*
5. *the landscape surrounding and providing a setting for existing towns and villages is not adversely affected;*
6. *in the open countryside, any appropriate development will be easily assimilated into the landscape and wherever possible, be sited close to an existing group of buildings.*

**In respect of CDC Policies C27 (SPP), C28 (SPP), ESD 16 (CIS) and WODC Policy BE2 above our comments are:-**

**Historic street pattern, layout and movement structure**

**The site is a significant and sensitive one that marks entry to or exit from the town of Woodstock. There is little evidence that the proposed development would affect the setting of the World Heritage site of Blenheim Palace or its park. However, the potential impact of any new development must also be considered in relation to the distinctive features that define the characteristics of the town of Woodstock and its green setting.**

**Woodstock is a late 12th century planned town. Whilst no buildings remain from this earliest period, the town’s key characteristics are its fine-grained ‘deformed’ grid of** **streets, its burgage plot pattern and buildings forming more or less continuous frontages to streets and public spaces . This urban structure defines the grain of the historic centre of Woodstock and has remained largely unchanged since the town’s foundation and extension in the 13th and 14th centuries.**

**By contrast, the lower density mid- to late- 20th century extensions to Woodstock have adopted a suburban, highways-led pattern of access roads and culs-de sac typical of residential layouts from the 1960s onwards. These standardised layouts can be seen anywhere and everywhere and significantly erode local character and distinctiveness. Unfortunately, it is this pattern that the development proposals perpetuate.**

**Internally, the design as illustrated does not show a legible network of streets. It bears no relation to Woodstock’s distinctive street patterns and does not meet the current national highways design guidance in *Manual for Streets 1 and 2*. The layout results from zoned site planning and is based on a ‘loops off access road’ approach that is unlikely to deliver the “safe, connected and efficient streets” advocated in Planning Practice Guidance (26:006).**

**The design is inward looking with very few connections across the ‘red line’ of the site boundary and none taken ‘edge to edge’ across the site. Woodstock East appears as a separate community, surrounded by landscape buffers. The layout illustrated cannot generate the physical and social integration necessary to create a successful extension to the existing town and needs fundamental redesign.**

**In summary, the outline master plan shows an out-dated planning approach of zoned land uses and a very poorly designed layout that takes little account of location, landscape or the character and shape of the existing town. These concerns are borne out by the detailed application. This development phase connects very poorly with existing and other proposed development immediately to the west, north and east, does not provide for active frontages to the primary route and does not even achieve adequate internal connection, proposing a layout with no less than 4 dead end streets for only 29 dwellings.**

**The scale and significance of the hybrid application is such that we urge both Cherwell and West Oxfordshire District Councils to request that it is presented to a national or regional design review panel for comment.**

**Landscape strategy and green infrastructure**

**The layout is poorly explained in relation to the existing and proposed green infrastructure. Sites like this that contain significant existing green infrastructure pose problems for development. There is a difficult balance to be struck between maintaining green corridors for biotic support and well-being and achieving sufficient and convenient movement throughout the site. However, the green infrastructure could have been used in a much more positive and creative way than is apparent. Existing landscape and heritage assets appear as constraints rather than as opportunities for creating a distinctive structure and character for the site and an alternative movement network for pedestrians and cyclists.**

**Scale of development.**

**This needs to be proportionate to the existing town, currently about 1300 homes. Woodstock East proposes up to 1300 homes plus a ‘150 unit care village’ to be delivered over 15 years. This is referred to in the Design and Access Statement as a “new quarter” but would more than double the size of Woodstock. This level of growth is unacceptable in a single, peripheral location. The layout is so disconnected from Woodstock’s existing urban structure that it would never function as an ‘emergent’, organic expansion of the town.**

**Land uses.**

**Urban structure, scale and design are the most significant issues at this stage. However, the range of land uses proposed will never function efficiently so long as the fundamental layout of the development and its relationship to the existing town are not right. For example, the “medium-sized supermarket” is unlikely to be viable in the location shown as supermarkets demand sites with high visibility. Even if located in a more prominent location on the site there is the issue of its potential negative impact on the Co-op and town centre shops generally. The Co-op anchors what remains of the retail core the town centre and is much more centrally located for all residents of the town.**

**We also have some doubts about the nature of non-residential uses located on the site.**

* **The proposal to create a “retirement village” within the development is inappropriate. There are already plenty of such facilities in the town and in the neighbourhood. What is needed are “extra care homes”. Currently there are no extra care homes in West Oxfordshire. According to Oxfordshire County Council Social and Community Care Services, the formula used to calculate the demand for extra care housing (based on the population of over 75s) suggests that Woodstock could support 55 such extra care flats, rising to 100 by 2033.**
* **The new football pitch and facilities are welcomed but it is not clear whether the existing sports facilities provided on the recreation ground will be maintained in addition to the new facilities proposed on site. We believe that the provision of recreation space within the proposal must not prejudice the existing open spaces in the town and in particular the recreation ground between New Road and the Hensington Estate. We ask that conditions to any consent be applied which require that this area be gifted to the town by Blenheim Estates with appropriate covenants to prevent it from being developed in any way other than for community or public recreation purposes.Further engagement is needed with residents and businesses on the range of uses proposed for the site and their relationship with existing services and amenities in the town generally and Hensington specifically.**

**8. PROVISION OF PUBLIC ART AND PERCENTAGE FOR ARTS**

***WODC POLICY TLC7***

***Provision for Public Art***

*The Council will seek a contribution for art provision to comprise:*

*a) speciﬁc art provision within or as part of the development;*

*b) an agreed art provision in the public realm; or*

*c) an appropriate ﬁnancial contribution towards an identiﬁed major public art project(s) within West Oxfordshire.*

*This policy shall apply to the following forms of development:*

*i. residential new build units of ten units or more; signiﬁcant conversions or refurbishment of existing buildings;*

*ii. signiﬁcant retail, commercial or leisure proposals, where the gross ﬂoor area is 1000 square metres or more;*

*iii. signiﬁcant development proposals by utility operators and Local Authorities.*

**There appears to be no provision in the application for a “percentage for arts”, although locations for works of art are indicated.**

**9. OTHER ISSUES**

**Section 106:**

**We trust that hybrid application will not be granted consent and have put forward our reasons why we believe that the proposals are not compliant with national or local policy and guidance. However, should the District Council be minded to grant permission for the development we believe that there must be substantial infrastructure benefits provided to the town. Some of these are included in the text above e.g. town centre parking provision, extra care homes, additional affordable homes, protection of the New Road Recreation Ground and improvement in existing and proposed infrastructure for pedestrians and cyclists . Other funding is needed to complete the renewal of the Woodstock Youth Club building, a percentage for arts, a ‘shared surface’ or similarly innovative means of traffic calming on Shipton Road, and other requirements of OCC and WODC.**

Yours faithfully

Colin Carritt, Chair, Woodstock Town Partnership

1. Sites identified in the allocated map. This site is not so identified. [↑](#footnote-ref-1)
2. Sites in the Green belt [↑](#footnote-ref-2)