

Our Ref: HM/7385

20 July 2015

FAO Bob Duxbury
Cherwell District Council
Planning Department
Bodicote House
Bodicote
Banbury
Oxfordshire
OX15 4AA

Dear Mr Duxbury,

Outline planning application (all matters reserved except for means of access) for a mixed use development comprising: up to 1,200 dwellings, including affordable housing and up to 120 unit care village (C2) with associated publically accessible ancillary facilities; site for a new primary school; up to 930sqm of retail space; up to 13,800sqm of locally led employment (B1/B2/B8) including transport interchange; site for a Football Association step 5 football facility with publically accessible ancillary facilities; public open space; associated infrastructure, engineering and ancillary works.

I have been instructed to write to you on behalf of Woodstock Town Council (WTC) to object to this amended proposal. Firstly, WTC would like to confirm for the record that although West Waddy ADP's letter of 22 May 2015 which accompanies the new proposal suggests that extensive meetings were held with WTC to discuss the proposals, no such meetings in fact ever took place.

WTC objected to the original proposal in February this year. The objections raised in the original letter still remain for the new proposal. Therefore, rather than repeat those objections, this letter considers the 'Technical Response to Consultation Document May 2015' (TRCD) submitted with the amended proposal which seeks to justify the scheme.

Notwithstanding the extant site specific objections made previously by WTC, recent planning policy developments confirm this proposal to be wholly inappropriate, at odds with the spatial strategy for this part of Oxfordshire and in advance of the legislative plan making process. I will explain.

Chapter 3 of the TRCD considers planning policy in relation to the proposal. One glaring and obvious omission from the section is the fact that Cherwell District Council's (CDC) Local 2031 has now been found sound by a Government Inspector. The plan makes no reference to a strategic allocation at Woodstock nor does it form part of the strategic strategy for the District. Accordingly, any suggestions that the site is needed by CDC to meet its housing need should be disregarded immediately. Moreover, the proposal is contrary to strategic policies in the plan.

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The TRCD makes reference to economic growth, the Oxfordshire and Oxford City Deal and the additional housing need this will warrant. WTC would say that the level of housing provided for in CDCs Local Plan 2031 is based on the figure advised in Oxfordshire's Strategic Housing Market Assessment (SHMA) to achieve economic growth. Assertions made in the TRCD that economic growth is not being addressed in Oxfordshire are entirely bogus.

It is telling that the majority of the chapter focusses on the soundness of West Oxfordshire District Council's (WODC) emerging Local Plan 2031 as there is now no strategic case to be made for this development in Cherwell. WODC's emerging Local Plan is at an advanced stage and is due to be submitted to the Secretary of State in July 2015 with an Examination in Public later in the year. It will be the role of the Government Inspector to establish whether the plan is sound or not.

A robust examination in public is the only way to properly test soundness. A ministerial letter sent to Councils on 19 December 2014 explained that for each authority the SHMA figure is only the starting point for addressing local need. It states that:

"Councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement."

This application cannot even be considered for approval until the correct statutory process of plan examination has been carried out, particularly when the examination is imminent.

The TRCD also states that other Oxfordshire authorities are not working fast enough to address Oxford's unmet housing needs, therefore the planning application should be approved to deliver much needed housing for Oxford. This issue of Oxford's unmet housing need was addressed in the Inspector's Report for CDC's Local Plan 2031. It states:

"17. It is unrealistic to expect that this district could reasonably provide for all of any unmet need arising from the city of Oxford's lack of capacity to meet all of its own requirements, as set out in the 2014 SHMA. Clearly, a joint approach involving all the relevant Councils is required on a co-operative basis to fully address the OANs of the whole county as one overall strategic housing market area. Such a process could only be harmed by Cherwell not meeting its own full district OAN, but if it does then that will at least mean that the pressures on the city of Oxford will not be made any worse by a failure to deliver the necessary level of new housing in this district and the sustainable development of the county as a whole will be materially assisted."

18. Accordingly, I am satisfied that it is appropriate for this plan to proceed on that basis, provided that there is a firm commitment from the Council to play its part in addressing the needs of Oxford city through that joint process in the near future, once those needs have been fully clarified/confirmed. In my judgement, the Council's modifications, notably in para B.89.b, are intended to and should help achieve that important objective."

This, from a Government Inspector, sets out in the clearest possible way that unmet need in Oxford should be met through collaborative working between the Oxfordshire authorities on a plan-led basis. Not though ad hoc speculative proposals such as Woodstock East.

The TRCD states that as WODC believe part of the site could be suitable for up to 180 new dwellings (as identified in the emerging Local Plan 2031) it is therefore logical to assume that the principle of development is acceptable on the site. WTC would say it is entirely illogical to assume that simply because 180 dwellings may be acceptable on part of the site, then up to 1,200 new dwellings, a care home and 13,800sqm of employment on an expanded site would also be acceptable. In any case, the suitability of this part of the site for development is still to be tested at examination.

WTC would point out that this very site was considered in 2006 for residential development during the Examination in Public for the previous WODC Local Plan. After hearing the evidence the Government Inspector concluded that:

"Notwithstanding the existing and proposed landscaping, the Proposal would constitute a significant incursion into the open countryside to the east of the town. I also consider that the size of the proposed development is excessive when measured against the scale of this small, attractive market town."

"At Woodstock whilst there is some scope for limited development within and on the fringe of the town, the potential impact on the historic fabric of the town in particular the Blenheim World Heritage Site is a key consideration."

The TRCD states that there are on-going discussions between the local highway authority (Oxfordshire County Council (OCC) and the developers transport consultant DTA. What is not clear however is whether OCC is upholding its serious objections to original proposal on transport grounds. What is clear at this stage however is that OCC has carried out extensive research for its emerging Local Transport Plan 4 to identify suitable locations for future Park and Ride sites. West of Woodstock is not one of them. Indeed granting permission for this proposal would prejudice OCC's future transport strategy.

WTC is not in any way convinced by assertions in the TRCD that existing retail and employment in Woodstock Town Centre would not be affected by the proposal. WTC note that no reference is made in the TRCD to the impact on the convenience store located on Shipton Road which has been a food store for generations. Whatever facilities the applicant promises to deliver as part of the development, they will not mitigate negative effects on the town center; only worsen them.

WTC also wishes to draw CDC's attention to comments made by both Thames Water and the Environment Agency in relation to water and sewage infrastructure provision. In its response to the amended application, Thames Water states that:

"In relation to the outline application, the existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development"

The Environment Agency state that:

"Our evidence suggests that there have been a number of sewer flooding/failure incidents in recent years, suggesting an existing capacity issue. This is confirmed by Thames Water in section 11.2 of the FRA. An additional 1500 dwellings would place additional strain upon this network, and therefore worsen sewer flooding magnitude and frequency. It is acknowledged within the FRA that upgrades will be required in order to accommodate the development. The precise details of these upgrades – including timing, to coincide with any phased development – are yet to be determined."

In light of these comments WTC are concerned about the impact on existing water and sewage infrastructure and effect this could have on flooding and water services in Woodstock and the surrounding area. Also, it must surely bring into question the viability of the proposal and the ability to deliver other 'benefits' the developers promise to provide through the development.

The TRCD also disputes the previous objections made by WTC in regards to negative impacts on the Green Belt, a World Heritage Site and very real danger of coalescence between the two historic settlements of Woodstock and Bladon. As already stated these objections remain valid and WTC see no compelling evidence with the new proposal to suggest they should be otherwise. It will ultimately be for the two District Councils to decide what this proposal will mean for this sensitive part of Oxfordshire and the irreversible harm it will cause to the historic and natural environment as well existing retail and employment facilities in Woodstock. WTC would ask the District Councils to think long and hard about the real and lasting negative effects of this development before making any decision.

Summary and Conclusions

The above demonstrates how the West of Woodstock proposal is not needed strategically by either District Council to meet its housing needs.

It would be premature to the collaborative working between all Oxfordshire authorities to establish the most appropriate plan led approach to meeting Oxford's unmet housing need (an approach validated by a Government Inspector)

The amended proposal in no way addresses WTC's initial objections in terms of the significant negative effects the scheme will have on Woodstock's Town Centre and the wider historic and natural environment.

In light of all these issues, WTC consider that the Council would be seriously remiss in approving this application and should therefore take the only possible decision in the circumstances and refuse planning permission for the clear cut reasons set out.

With Kind Regards.

Yours sincerely



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