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24 August 2015

west waddy **ADP**



Dear Mr Duxbury
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By Post and By Email

Dear Mr Duxbury,

PROPOSED DEVELOPMENT AT LAND SOUTH OF PERDISWELL FARM AND EAST OF WOODSTOCK, SHIPTON ROAD AND OXFORD ROAD, WOODSTOCK – KNOWN AS ‘WOODSTOCK EAST’.

PLANNING APPLICATION REF: 14/02004/HYBRID

Further to our meeting on the 12th August 2015, on behalf of our clients, Pye Homes and The Vanbrugh Unit Trust, part of the Blenheim Estate, thank you for giving us the opportunity to respond to the matters raised at our meeting. Please note that these comments should be read in conjunction with the application documents submitted in May 2015 and the document entitled ‘Blenheim Palace World Heritage Site: Securing the Future of one of the Nation’s Greatest Heritage Assets’ subsequently submitted. Our comments are as follows:

Overall Comments on the Cherwell District Council Policy Response:

We observed that the description of development at the top of the letter is incorrect, and does not reflect the wording, which was agreed with you and Catherine Tetlow at your request, which is:

“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.”

Furthermore, the comments state “Woodstock is identified as one of West Oxfordshire’s most sustainable settlements, a rural service centre. However, with a population of about 3,000 the proposed development of up to 1,500 homes (involving about 3,000 residents) would represent a doubling of the size of the population...” This again is incorrect and does not reflect the revised scheme, which now proposes up to 1,200 dwellings. The policy comments should be assessed again and amended to reflect the revised scheme.

We are also concerned that the policy comments are framed in a highly negative manner, despite substantive evidence submitted to the contrary. It appears to us that in drafting the response, it little consideration has been given to the thorough evidence base submitted with the application or the updated material submitted in May 2015, particularly that contained in the document entitled ‘Blenheim Palace World Heritage Site: Securing the Future of one of the Nation’s Greatest Heritage Assets’ report.

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We would further add that the planning system is supposed to be evidence based. From our review of many of the officers and consultees responses, there appears to be little attempt (if any) to provide any reasoned substantive counter evidence to justify their various standpoints or indeed provide any reasoned objective assessment.

Five Year Housing Land Supply to

The Cherwell District Council policy response states that:

'At the present time, Cherwell is able to demonstrate that the district has a five year supply of deliverable housing land. There is no pressing need for additional housing land to be brought forward. West Oxfordshire also has a stated 5-year land supply position.'

In this respect, no reference has been made to the 'Technical Response to consultation,' (May 2015), which responded to the comments that had been received to date at that time. Paragraphs 3.4.1 to 3.4.4 and Appendix A explained why the applicant considers that neither West Oxfordshire or Cherwell District councils have a five year housing land supply. In the case of West Oxfordshire this argument has been reinforced since then by the letter from Simon Emerson, the Inspector for the West Oxfordshire Local Plan Examination, dated 30th July 2015 which raised serious concerns in this particular respect.

In his letter the Inspector states in Paragraphs 4.2 and 4.3 that:

'4.2 The National Planning Policy Framework (paragraph 159) requires Councils in their local plans to meet in full their area's housing needs. Those needs should be established by a SHMA based on an objective assessment of housing needs involving neighbouring authorities where HMAs cross administrative boundaries.'

4.3 In seeking to test the Plan against national policy, I am concerned that the only comprehensive SHMA in evidence before me is one which the Council (apparently) seeks to distance itself from and criticise, yet this is the evidence that all the other local planning authorities within the HMA appear to regard as a credible basis for taking their plans forward. Conversely, all the new, post- SHMA analysis provided by the Council has a West Oxfordshire focus. There is no evidence that the Council has been actively involving the other authorities in the HMA in this new work or that a general updating of the SHMA for the Oxfordshire HMA has been agreed. If the Council is persuasive in all its criticisms of the SHMA, there may not be appropriate evidence, consistent with national policy, to find the Plan sound.'

As a result of these concern the Inspector states that: *'the Council should be aware that on my current understanding there may be a potentially significant difficulty in relation to soundness.'* (Paragraph 4.1). In the light of these comments it would seem likely that the Local Plan will be found unsound and returned to the Council for more housing to be allocated.

We along, with most other planning consultants active in West Oxfordshire firmly believe that the District does not have a five year housing land supply. In addition, there is also the pressing need to accommodate Oxford City's identified unmet housing need. The Oxfordshire SHMA estimates Oxford's housing need as being between 24,000 and 32,000 in the period up to 2031, of which the City council states that it only can meet 10,000. The Oxford Times reported on the 30th July 2015 that the Oxfordshire District Councils are clashing over how this housing should be allocated amongst themselves, with Matthew Barber, leader of the Vale of White Horse District Council asking Greg Clark, the Secretary of state for Communities and Local Government, to intervene and require Oxford City to review its Local Plan. It is clear therefore, that there is substantial unmet need and substantial disagreements as to how this unmet housing need should be distributed among the Districts. We believe this housing need is likely to continue to be unmet for a substantial period to come, contributing to the continuation of Oxford City's housing crisis. The need for this additional housing is particularly acute as Oxford lies at the heart of the City Deal growth corridor where a significant increase in housing is required in order to support the major expansion in employment that this

central Government initiative is seeking to create in this part of Oxfordshire. We note that no weight has been given to the Oxford City Deal in the planning policy comments.

The site at Woodstock has substantial merit over many of the other sites under consideration in that it is not located in the Green Belt or other landscape or biodiversity designations. In fact, it is the first deliverable and developable land you come to on leaving Oxford City along the A44. Woodstock is, by WODC's own admission their third most sustainable settlement. It adjoins the service centre of Woodstock, is close to Oxford, which it is connected by a frequent bus service along the A44 making both the City and the Water Eaton, Oxford Parkway railway stations readily accessible. In addition Long Hanborough Station is within 3 miles and is also serviced by the 233 bus route. In addition, it is very readily accessible to the emerging employment centres along the A44 at the North Oxford Gateway and Begbroke Science Parks where over 100,000 sqm of employment space is either consented or planned within the life of both the CDC Local Plan and emerging WODC Local Plan.

If both Cherwell and West Oxfordshire District Councils granted planning permission for the proposed development it would be a welcome indication that the councils are seriously committed to meeting Oxford's unmet need, illustrate their commitment to the City Deal and help to generate a spirit of co-operation between the local authorities in addressing this pressing planning issue.

Cherwell District Council Strategic Housing Land Availability Assessment (2014)

The Cherwell District Council policy response makes reference to the part of the site within Cherwell District being rejected in the Cherwell District Council Strategic Housing Land Availability Assessment (2014) which stated in Appendix E that:

"This is a cross boundary site between Cherwell and West Oxfordshire Districts. The part of the site in Cherwell is not considered suitable for residential development due to it being in a less sustainable location, and due to adverse impacts on the historic environment and countryside."

However, as the response acknowledges the West Oxfordshire SHLAA:

'identifies 'Woodstock East' (site 162 in the SHLAA), which constitutes the eastern part of the application site, as a site with potential for development for between 150 and 180 dwellings. It is identified as being suitable, achievable, available and developable. The commentary states, "The site is relatively close to the town center, access can be achieved from the A44 and development would relate well to the existing built form. It would not have a significant landscape impact and there are no significant constraints to development".'

Given that the part in West Oxfordshire is the more sensitive part of the site, close to the World Heritage Site and the existing town of Woodstock, if it is accepted that this part is acceptable for development, it would be expected that the part within Cherwell District Council would also be suitable for a sensitively designed scheme, such as that indicated on the revised masterplan.

The statement in the Cherwell SHLAA was prepared before the current application was submitted to the Council demonstrating the sustainable credentials of this site and that rather than there being adverse impacts on the historic environment, it would lead to substantial benefits in providing a long term source of funding for the upkeep of the World Heritage Site as set out in the 'Blenheim Palace World Heritage Site: Securing the Future of one of the Nations Greatest Heritage Assets' report.

Landscape

The Planning Policy Response acknowledges that the "visual quality of the countryside is not striking." The current Masterplan proposals which involve the provision of a high quality development that respects the context and involves the provision of substantial open space and extensive landscaping would therefore not have a detrimental impact on the local landscape or the setting of Woodstock.

With regard to the potential impact on the Woodstock Conservation Area, English Heritage (now Historic England) acknowledged in their letter dated 27th February 2015 that:

“As Woodstock has already been greatly expanded from its historic core we do not consider further expansion of housing onto the application site to necessarily be harmful to the setting of the conservation area, provided that similar screening to that already around the newer part of the town is employed to maintain the green approach to the south. As discussed above in respect to the impact on Blenheim Park we consider that the proposals set out in the Landscape Strategy should be adequate to achieve this.”

The Masterplan proposes similar screening to that already around the newer part of the town, consequently there would not be a negative impact on the setting of the Conservation Area.

Infrastructure Provision

The policy response questions whether Woodstock could sustain such a size and potential rate of expansion in terms of infrastructure capacity, employment opportunities, traffic generation and *‘the wider impact on the character and appearance of the village as a whole.’*

Woodstock is also a town not a ‘village’ as referred to in the policy response, and this is acknowledged in the West Oxfordshire Local Plan 2031 which refers to it as *‘a historic town of national, if not international, renown,’* (para 9.5.3) and even identifies a *‘town center boundary.’* (para 9.5.512 and Figure 9.16).

The fundamental problem with small-scale development is that it does not provide the opportunity for new infrastructure provision. We know from public consultation events that we have held that often people’s most important concerns are with regard to currently over loaded infrastructure provision such as the local primary school, doctor’s surgery and recreational facilities.

The scale of development proposed by this scheme will not only address current infrastructure pressures such as primary school places; but it will also cater for the needs of the town due to the scheme, for example; the provision of a new primary school; retail store, recreational facilities and a compliant ground for Old Woodstock Town Football Club. It will also enhance the facilities the town has to offer including a proposed astroturf multi games area, trim trail and green public open space.

Significantly, it will also provide a one off opportunity to secure the long term funding of one of the nations most significant heritage assets, the nearby Blenheim Palace World Heritage site on which the prosperity of Woodstock is and has been intimately linked for many centuries and as set out in the ‘Blenheim Palace World Heritage Site: Securing the Future of one of the Nations Greatest Heritage Assets’ report. We note that to date no formal reference has yet been made by officers to what we believe is a very significant material consideration.

The Highway Authority accepts that there will not be unacceptable traffic generation.

The proposal will therefore not only meet infrastructure requirements but will also deliver major planning gains.

Retail

The policy response implies that no retail sequential test or impact assessment has been undertaken. This formed part of the original Environmental Statement submitted with the application in December 2014. (see paragraphs 4.3.125 – 4.3.157 & 4.3.177 -4.3.191 for the impact assessment & 4.3.158 – 4.3.176 for the sequential test). The assessment concluded:

“that there are no suitable, available and viable sites within Woodstock upon which a new food-store could locate that would serve as a sequentially preferable location for the proposed development,”

It further said that the retail impact of the development on Woodstock town center would not be

negative but minor positive; while for the residents of Woodstock the provision of the proposed new store would have a significant positive impact upon their shopping patterns and sustainability.

Employment

With regard to its proximity to sources of employment the site is located in one of the most sustainable locations in Oxfordshire given that it is located close to the Begbroke Science Park and the proposed development at Northern Gateway, where up to 90,000 square metres of employment floorspace is proposed (Policy NG2 in the Northern Gateway Area Action Plan). These sites are both accessible by public transport and cycling from the proposed development and are more accessible to it than parts of Oxford itself.

The site is also located within the Oxford and Oxfordshire City Deal improvement area known as the 'Knowledge Spine,' where major expansion of employment is proposed. These are ambitious and far-reaching strategies to create jobs and training opportunities in science and pharmaceutical industries, and improve the standard of living for all Oxfordshire residents. The proposed development would therefore contribute to the local employment offer, and complement the other business centers.

The planning policy comments state that:

'the provision of employment opportunities on the application site is inconsistent with the Local plan strategy which focuses employment development at Banbury and Bicester.'

However, the employment and economic development officers at West Oxfordshire and Cherwell District Councils consider that there is a need in this location for small office spaces for start-up businesses and that the site is well located for such provision in the light of its close proximity to the A44, Oxford Airport and nearby business parks. It was for this reason that the amount of employment floor space provided on the site has been increased to be in line with advice from other officers during the consultation process.

The policy response states that:

'The potential impacts of new employment development on the natural and historic environment and the character of the area will also need to be considered carefully including locating employment and residential development in close proximity.'

However, the proposed employment will consist of light industry and office use, which will not generate any noise or dust, which would conflict with residential use. It would also be attractively designed and would be located well away from the Blenheim Palace World Heritage site and Scheduled Monument.

Prematurity

The Planning Policy comments state that with regard to Local Plan prematurity:

"some weight should be given to the fact that this represents a substantial, strategic proposal in advance of the Examination of the new West Oxfordshire Local Plan, albeit one that is in part consistent with the intention to bring some land east of Woodstock forward for development."

This issue was addressed in some depth in the Technical Response (May 2015), paragraphs 3.6.1 – 3.6.13. In particular paragraph 3.6.11 stated:

'the timetable for dealing with Oxford's unmet need is such that there is at present, no emerging Local Plan in place or at an advanced stage that identifies a strategy for dealing with the unmet need. Therefore, the argument of prematurity cannot be advanced in this regard. Taking into account the amount of housing that needs to be provided to meet West Oxfordshire and Cherwell's own needs, this site will assist in delivering only a small proportion of the total Oxford unmet housing need that

needs to be planned for. Therefore allowing this site to come forward now, would not undermine any future strategy to deal with the total unmet need. This is further supported by the fact that Woodstock East's location is within a highly sustainable location where significant future growth is already planned for. Therefore there is no suggestion that this development will undermine any future plan making process or strategy.'

These arguments are further reinforced by the Inspector's questions to West Oxfordshire District Council regarding the soundness of its proposed housing provision and in our opinion, the significant likelihood that the plan will be sent back to the Council with a requirement for it to increase its housing provision.

Scale

We also note that the policy comments emphasize the phrase "*doubling the size*" without substantiating, or demonstrating objectively how the scale would be relevant from a planning policy point of view. It appears that Planning Officers are influenced by the local objector's campaign. The Officers gave significant weight to the phrase "*doubling the size*" in preparing the policy comments rather than focus on the site's sustainability, unmet housing need within CDC as well as the neighbouring authorities, and the significance of sustainable development as highlighted in the NPPF.

As indicated in the submitted Sustainability Statement, Technical Response to Consultation, and Design Response Document (May 2015), the proposed development would be implemented over a number of years, at least 15 years. It will bring new infrastructure and facilities as it progresses. The proposals break the development up into parcels of an appropriate scale, reflective of the existing character and urban grain of Woodstock. It should be noted that the Council's Design Advisor, Jon Rowland, provides very positive comments on the carefully designed revised layout (see below).

Whilst commenting on scale, we feel it appropriate to reiterate our comments above as they are very significant. Woodstock has over recent years, received ad hoc development, (in common with many other areas in the county), but due to the small scale of such development, they have not been able to deliver the required improvements in infrastructure and as a consequence schools and other local facilities have come under increasing strain. Developments of this scale are essential to ensure continued sustainability of such settlements, which smaller adhoc schemes cannot.

Without a significant step change in housing and employment delivery, provision of infrastructure and the sustainability of Woodstock is at risk.

Furthermore, the development of this scale would secure the long-term future of Blenheim Palace, a World Heritage Site.

Heritage

We have yet to receive comments from Historic England (HE). Following our meeting; we observed that the ICOMOS comments were uploaded on the Council's website on the 14th August 2015, but we believe this was before they had been made aware that this scheme offered to secure the long term future of the World Heritage Site and, enable Blenheim Palace (which we remind you has no access to significant public funds or support AND is the only World Heritage Site in the UK to be in this invidious position) to meet the requirements set out in the World Heritage Site Management Plan.

We understood at our meeting that the Council had also not consulted with HE and ICOMOS upon the submitted additional information on the 'Blenheim Palace World Heritage Site: Securing the Future of one of the Nations Greatest Heritage Assets' report (July 2015), but you assured us that both HE and ICOMOS would be consulted on this document the same day (12th August 2015). Please can you confirm that this has now taken place? We look forward to receiving comments from Historic England and revised comments from ICOMOS on this very significant and material additional information.

The 'Blenheim Palace World Heritage Site: Securing the Future of one of the Nations Greatest Heritage Assets' report is hugely significant as it demonstrates how the development would protect, enhance and secure the long term future of an internationally important heritage asset. No weight can be given to what ICOMOS have said until you receive further comments from them on this document.

We enclose an Opinion from our client's barrister, Tom Hill QC, which confirms that this is a significant material consideration and that:

'In this case, given the opportunity to secure the future of the WHS in perpetuity and the significance of this outcome for Woodstock, for Oxfordshire, nationally and even internationally, it is difficult to see how anything other than the greatest possible level of weight should be accorded to the heritage benefits of the Woodstock East proposals. I would therefore expect this factor to weigh very heavily in the balance in support of the grant of planning permission.'

Transport Interchange

As you are aware, Oxfordshire County Council (OCC) confirmed that, in respect of highway matters, all of the technical concerns raised previously have now been addressed.

The only issue on which OCC are still objecting is in relation to the proposed transport interchange.

The Officers have commented that they are looking for a larger site (which can accommodate over 1100 car parking spaces) for a 'Park & Ride', and they are concerned that providing 300 car parking spaces on the application site may harm the delivery of the large site. We would like the transport interchange to remain as part of the current application as we believe it would have substantial benefits as highlighted in the submitted transport assessment. However, to overcome OCC's concerns and as discussed in our previous meeting, we would suggest that a temporary permission for 10 years that can be conditioned or controlled by the legal agreement, which can be monitored. This could be renewed on an annual basis with OCC and Cherwell (and WODC if they wanted to be party) until OCC identify larger and deliverable site as proposed in LTP4.

Our Transport Consultant (DTA) suggested wording of the condition relating to the transport interchange is as follows:

Condition - No construction of the transport interchange/car-parking area shall commence until a detailed strategy setting out the intended operation and purpose of the car park has been submitted to and agreed by the Local Highway Authority. If such agreement is reached, then the car park shall be operated in accordance with the agreed strategy unless otherwise agreed in writing with the Oxfordshire County Council and LPA. Temporary Permission will be granted for 10 years and details of the operation of the Transport Interchange shall be submitted to the Local Planning Authority and the Highway Authority on an annual basis. If Oxfordshire County Council identify an alternative site for a new Park and Ride facility in the A44 corridor, then operation of the transport interchange shall cease the day before the new Park and Ride is brought into operation.

Reason – to ensure that the construction and use of the car park does not conflict with OCC's draft Policy intentions for a new park and ride on the A44 corridor and would not adversely impact on its operation.

In our view, the open nature of the proposed Transport Interchange development and its operation should not give rise to an 'in principle' objection. After 10 years, the site could plainly be redeveloped for other purposes (i.e. housing and/or employment) without undue wastage of natural resources.

Should the Council still consider the 'transport interchange' as an issue, then the client would be prepared to remove the transport interchange completely from the current application.

Connectivity

The revised Masterplan will create a place and a connectivity network that is cohesive and fully integrated. It has been designed to provide a clear mental map with legible streets and spaces. This promotes walking and cycling; giving pedestrians and cyclists priority over vehicular movements- this is reflected in the increase of routes both north-south and east-west. A clear focus of the revised Masterplan was to improve this site wide connectivity, not only within the Masterplan but more importantly the connectivity to the existing context. This has been achieved particularly to the west by integrating an increased number of pedestrian and cycle paths with the existing context.

To effect this, the local centre has also been redesigned in this iteration of the Masterplan, not only by ensuring that there is a clear, legible and direct link from the proposed local centre at 'Hensington Place' to the existing street network at Flemmings Way and Hedge End, but also by the complete realignment and redesign of this place which now acts as a nodal point, integrating the context to the west with the new development to the east. The intention is that the existing public footpath that runs to the east of Woodstock would also be strengthened. This would be achieved through improved landscaping and defining the footpath with front doors and residential properties overlooking this public route. This will create a safe and secure route through this part of Woodstock and will help to seamlessly integrate, what will become, a two sided pedestrian access. The proposed movement framework illustrates that it is the intention to connect the proposed masterplan to this network in at least 4 places to provide the required connectivity to ensure that these two neighbourhoods are fully integrated.

Comments received from CDC Urban Design Consultant in February 2015 did raise some concerns regarding the street network that whilst the ambition was correct, it should be improved to make it easier for future residents to find their way around the development. We feel that this ambition has been achieved through the redesigned Masterplan, this is supported by the explanation in the connectivity chapter of the Design Response Document- May 2015 and is reflected in the second set of comments received from CDC Urban Design Consultant, May 2015 which does not raise east-west connectivity as a continued concern but would like to see further improvements of the north-south pedestrian network.

Comments received on the revised Masterplan

The team were pleased to receive, what we feel are an encouraging and positive set of comments from CDC Urban Design Consultant. These comments are supportive of the fact the Design Response Document supported by technical responses have helped to mitigate the previous concerns made in the comments made in February 2015. This reflects the positive changes that the Masterplan has undergone throughout the consultation period and through conversations with officers regarding the design of the Masterplan for Woodstock East.

The comments received in February 2015 raised concerns over the following themes, which have now been addressed by the Design Response Document;

- the design philosophy;
- the relationship with the context, the landscape and the Estate;
- the integration between the east and west of the development surrounding the park;
- the perceived convalescence between Kidlington and Woodstock;
- the quality of the presentation;
- the juxtaposition of formal/ informal nature of the relationship between the palace and the Masterplan;
- the connectivity and legibility of the Masterplan;
- the definition of a places and spaces strategy;
- the integration of the Care Village;
- the analysis and establishment of positive character;
- the sense of place;
- the streetscapes;
- reflecting the character of Woodstock;

- good 21st century design;

It is clear through the reading of the comments received in August 2015 that these previous concerns have been addressed to the extent that production of a Design Code can form part of the next steps and that a more legible and coherent Masterplan is the outcome of this exercise. The project team supports this suggestion that the next steps would see the progression of a more detailed Design Code supported by the conditioning of some elements of the Masterplan to ensure that the Local Authorities can take comfort in this approach and remove some of the uncertainty that an outline application can often bring.

We are also pleased to see that the Urban Design Consultant has recognised and supports the continued investment, stewardship and involvement of the Blenheim Palace Estate and we agree that this is “a great opportunity to ensure long term benefits for the town”.

Turning to material considerations to weigh in the planning balance, I trust that the site’s deliverability, sustainability and accessibility (as highlighted in Sustainable Statement – May 2015) will also be given due consideration in your determination of the application.

Viability Appraisal

Please find attached a copy of the Viability Appraisal prepared by Carter Jonas which we referred to at our recent meeting. This concludes that the proposed development is viable and will therefore realise a capital sum to facilitate the repair fund for the World Heritage site. **Please note that this report is private and confidential.**

S106 Contributions

We still have not received details of the S106 contributions which the Districts are seeking. I would be grateful if you could please forward them to me by return.

Summary

The proposed development will have a number of important planning benefits which are a significant material consideration in determining this application. Those arising from the proposed development include:

- Providing funding to secure the long term future of the Blenheim Palace World Heritage Site without recourse to public funds;
- Providing much needed housing provision in one of West Oxfordshire's most sustainable settlements (in third equal place with Carterton and Eynsham - WODC Settlement Sustainability report (2013));
- Providing development on the first deliverable, non-Green Belt site north of Oxford along the A44, which therefore accords with Government policy to boost significantly the supply of housing whilst also protecting the Green Belt;
- Making a significant contribution towards the City Deal/Knowledge spine objectives, both through housing and employment provision;
- Addressing the current infrastructure pressure in Woodstock and ensuring its ongoing sustainability for generations to come by delivering meaningful new infrastructure;
- Delivering improvements to the local highway network so that the highway authority is satisfied that the proposed development will not have an unacceptable impact on traffic on local roads;
- The development has been designed with extensive mitigation so that the residual impacts, such as on heritage assets, are in our view minimal and any real or perceived harm is significantly outweighed by the benefits, including the long term protection and enhancement of the WHS and Scheduled Monument.

The proposed development will therefore have significant economic, social and environmental benefits which significantly outweigh any adverse impacts. The proposed development therefore comprises sustainable development and should therefore be approved.

Yours sincerely



John Ashton
Planning Partner
For West Waddy ADP

cc: Ms Catherine Tetlow (West Oxfordshire DC) (By Post and By Email)
The Vanbrugh Unit Trust, part of the Blenheim Estate (By Email only)
Pye Homes (By Email only)

Encs.

- A letter from Tom Hill QC; dated 18th August 2015;
- Viability Appraisal by Carter Jonas