

Suggested draft response to Cherwell Local Plan – January 2025

Cherwell Local Plan Review 2042 – Regulation 19 Pre-Submission Draft Plan

1. Introduction

1.1 Thank you for the opportunity to make representations to the pre-submission draft Cherwell Local Plan. We welcome the progress being made with the plan and hope that you find the comments below helpful as you consider whether to submit the plan for independent examination.

1.2 For ease of reference, our comments are set out in relation to the following issues:

- The Duty to Co-Operate
- Procedural and Legal Compliance
- Soundness

1.3 Dealing with each point in turn.

2. The Duty to Co-Operate

2.1 As you are aware, local planning authorities continue to be under a duty to co-operate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

2.2 In this respect, West Oxfordshire District Council is satisfied that Cherwell District Council has satisfactorily discharged this duty in preparing the pre-submission draft Local Plan.

2.3 A number of meetings have been held between the two authorities including more general meetings of the Oxfordshire Planning Policy Officer Group (OPPO) as well as a number of specific bilateral meetings.

2.4 Those meetings have been informative and constructive enabling each authority to have a good understanding of emerging plan content and respective plan preparation timetables.

2.5 In summary, West Oxfordshire District Council is satisfied that Cherwell District Council has sought to engage positively and continuously throughout the preparation of the draft plan in accordance with the duty to co-operate and has no concerns in this regard.

3. Procedural and Legal Compliance

3.1 As far as we are aware, Cherwell District Council has fulfilled all relevant procedural and legal requirements in preparing and publishing the draft Local Plan including compliance with its published Statement of Community Involvement (SCI) and the timings set out in its Local Development Scheme (LDS) and associated updates.

3.2 Clearly this will be a matter for the appointed Inspector to determine but we are not aware of any obvious failings in terms of relevant procedural and legal requirements.

4.1 Soundness

4.1 Officers consider the draft plan to be well written and comprehensive, covering a number of highly topical and relevant issues around climate change, healthy place shaping and nature recovery.

Themes, vision and objectives

4.2 The three overarching themes which run through the plan are supported and are consistent with the Oxfordshire Strategic Vision which each of the Oxfordshire local authorities has endorsed.

4.3 The plan's vision is also supported, being suitably positive and aspirational and with a strong focus on climate action, economic success, providing new homes and the timely provision of infrastructure. Officers also welcome the emphasis placed on the rural economy, healthy communities and protecting and enhancing the natural and built environment including the District's rich heritage.

4.4 As we highlighted during the Regulation 18 plan preparation stage, it is important that a local plan achieves internal consistency and unfortunately, we have some concerns that the proposed allocation of 450 homes to the south-east of Woodstock runs counter to a number of the aspects of the plan's vision.

4.5 In particular, the pursuit of vibrant and sustainable communities, timely investment in infrastructure, the protection and enhancement of the District's rich heritage and the provision of sustainable transport links. We expand on our concerns regarding the proposed allocation later in this response.

4.6 We would also observe that the vision makes insufficient mention of achieving modal shift away from the private car and towards more sustainable forms of movement including active travel. This is fundamental to addressing the climate emergency and could be given a stronger emphasis.

4.7 We also note that no mention is made of Woodstock in the overall vision which serves to reinforce our concerns that the proposed allocation of 450 homes to the south-east of the town has been artificially subsumed within the overall Kidlington Area Strategy and should instead, form part of the Rural Areas Strategy or its own individual area strategy.

4.8 Like much of the draft vision, many of the plan's 15 strategic objectives are generally supported. They are logically arranged under three main themes and are clear and distinct, avoiding duplication and repetition. Again, there is a strong emphasis on climate change, health, the economy and built and natural environment.

4.9 SO6 seeks to prioritise active travel which is welcome but as outlined above, could perhaps be given a stronger emphasis in the overall vision.

4.10 As is the case with the vision however, we have some concerns that the proposed Woodstock allocation presents a conflict with some of the stated plan objectives. For example, the provision of sustainable, well-designed, safe, inclusive and mixed communities (SO11) conserving and enhancing the countryside, landscape, the natural environment, and the setting of its towns and villages (SO13) and protecting and enhancing the historic environment, including protecting and enhancing cultural heritage assets, archaeological remains, conservation areas, registered parks and gardens.

4.11 Again, we expand on our specific concerns in more detail below.

Development Strategy for Cherwell

4.12 The draft plan states that the spatial strategy is intended to deliver the vision and objectives for Cherwell. The overall District-wide spatial strategy is noted and whilst we have no major concerns in terms of soundness, we would observe that a number of aspects do not have an obvious spatial dimension to them (e.g. achieving net gains in biodiversity or raising design standards).

4.13 With regards to the spatial strategy for the Kidlington area, we note that a summary description is provided on page 7 of the draft plan and again on page 21. It is not clear however why the two strategies are not identical, with the former on page 7 being more comprehensive and including reference to a number of issues not mentioned at page 21, including addressing transport connectivity and infrastructure challenges and ensuring the planned benefits of committed developments are delivered for local communities.

4.14 There is also some inconsistency in the text with page 7 referring for example to improving the built and green environment of the High Street, parades and wider Kidlington area whilst page 21 refers only to improving the built and green environment of Kidlington village centre.

4.15 What is particularly noticeable and concerning however is the lack of any mention of Woodstock in either summary which raises further questions about whether it is appropriate to include Woodstock within the Kidlington area strategy, or whether it should form part of the broader rural areas strategy.

Policy SP1 – Settlement Hierarchy

4.16 We note the inclusion of Policy SP1 which sets out a clearly defined settlement hierarchy for the District based on five main tiers. This is a similar approach to that taken in West Oxfordshire and is supported.

4.17 Policy SP1 provides specific advice on the circumstances in which residential development will be permitted in each these five tiers which raises the question of how other forms of development will be considered e.g. economic, commercial, retail etc.

4.18 Whilst not a soundness concern, an alternative option would be for Policy SP1 to set out the proposed settlement hierarchy only and then for other plan policies to cross-refer to it, clearly outlining what will be permitted and where.

- 4.19 Thus, the plan could include a separate policy on unallocated windfall residential development which outlines the circumstances in which this would be permitted as well as separate, equivalent policies for other forms of development where the settlement hierarchy is of relevance.

Theme 1 Policies – Meeting the Challenge of Climate Change and Ensuring Sustainable Development

- 4.20 This section of the plan includes a number of policies relating to climate change including net zero carbon development, embodied carbon, renewable energy, sustainable drainage, biodiversity net gain, pollution and sustainable transport.

- 4.21 Upon review of these policies, we have no concerns in terms of soundness and would simply make the following observations.

Policy CSD1 – Mitigating and Adapting to Climate Change

- 4.22 We note the policy requires all new residential development to achieve a water efficiency standard of 110 litres per person per day. This reflects the optional building regulations and was included in the West Oxfordshire Local Plan adopted in 2018. We are aware that Oxfordshire falls in an area of considerable water stress and would urge Cherwell District Council to consider a more ambitious target of 90 or even 75 litres per person per day.

Policy CSD2 - Achieving Net Zero Carbon Development – Residential

- 4.23 We welcome Cherwell’s ambition to exceed the 2021 Building Regulations in line with the December 2023 Written Ministerial Statement on Energy Efficiency. We note the proposed alignment with Part L through the use of Target Emission Rates (TERs) and the proposed use of prescribed Target Fabric Efficiency Standards.

- 4.24 We also note that additional planning weight will be afforded to proposals which achieve ‘optional’ space heating and energy use intensity targets. This is supported in principle.

- 4.25 We are however aware that a number of local authorities including Tendring District Council and Merton Borough Council have successfully taken through policies which include energy-based metrics as a specific requirement of development rather than an optional one.

- 4.26 Consideration should perhaps therefore be given to strengthening the policy in this respect.

Policy CSD 9: Water Resources and wastewater infrastructure

- 4.27 Water supply and foul water capacity are key considerations in Oxfordshire and we welcome the inclusion of this policy. We note the reference to the potential use of phasing conditions to restrict occupancy until such time as necessary infrastructure upgrades have been provided. This is an approach we are having to take in West Oxfordshire and we therefore welcome its inclusion as part of the draft Cherwell Local Plan.

Policy CSD 12: Biodiversity Net Gain

- 4.28 The proposed approach towards BNG is noted and supported, in particular the requirement for at least 20% net gain in the draft Oxfordshire Nature Recovery Network Core and Recovery Zones and at the allocated strategic development sites.
- 4.29 We note that the draft nature recovery network is due to be replaced by a new Nature Recovery Strategy later this year. As far as we are aware, there are no intentions to define core or recovery zone as part of the new strategy and so consideration should be given as to how the wording of the policy can be suitably 'future proofed'.

Policy CSD 22: Sustainable Transport and Connectivity Improvements

- 4.30 The policy seeks to give priority to the movement of people according to the following hierarchy:
1. Walking and wheeling
 2. Cycling and riding
 3. Public transport
 4. Motorcycles
 5. Shared vehicles
 6. Other motorised vehicles
- 4.31 All development should take a 'decide and provide' approach to manage travel demand by reducing the need to travel, planning for sustainable travel modes, and providing for zero emission vehicle use.
- 4.32 Furthermore, all strategic developments will be expected to provide direct bus access, rapid electric charging points, car and electric vehicle community sharing clubs and mobility hubs in accessible locations, preferably close to public services/ amenities on site.
- 4.33 Whilst the aims and objectives of the policy are fully supported and largely reflect the County Council's Local Transport and Connectivity Plan (LTCP5) we have concerns that the proposed allocation of land to the south east of Woodstock does align with them, insofar as the distance of the site from the services and facilities in Woodstock will likely lead to a strong reliance on the use of the private car.
- 4.34 We expand further on this point in our comments below.

General Comments

- 4.35 As a general observation, we note that there are a relatively large number of policies under this first climate change theme and that some could perhaps be combined in the interests of brevity. A good example are the two separate policies on net zero carbon development in residential and non-residential development which could easily be condensed and combined into a single policy.
- 4.36 Similarly, a number of the policies relating to the water environment could perhaps also be combined.

- 4.37 As a further general observation, we note that of the 25 policies included under this theme, that all but one (waste collection and recycling) are identified at Appendix 11 as being 'strategic' in nature.
- 4.38 We would respectfully draw your attention to paragraph 21 of the NPPF which states that strategic policies should be *'limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any nonstrategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies'*.
- 4.39 Indeed, looking at the draft plan's policies in their totality, only three are identified as being non-strategic.
- 4.40 Given the nature of many of these policies (e.g. housing size and type, community employment plans, hot food takeaways etc.) we would question whether they are all strategic in the context of the NPPF.

Theme 2 Policies - Maintaining and Developing a Sustainable Local Economy

- 4.41 We have reviewed the policies under this theme and have no soundness concerns. We welcome the provision of additional employment space under Policy LEC1 and the approach taken towards the protection of existing employment sites under Policy LEC2.
- 4.42 Policy LEC3 deals with new employment proposals on unallocated sites and in doing so, links to the settlement hierarchy set out in Policy SP1. Whilst we have no concerns about this, it reinforces our earlier point that there should perhaps be an equivalent standalone policy dealing with housing proposals on unallocated sites, with Policy SP1 setting out the settlement hierarchy only.

Policy LEC 5: Community Employment Plans

- 4.43 We note the requirement for significant developments to be supported by a site-specific Community Employment Plan (CEP) covering both the construction and operational phases of development. This is welcome and we are looking to introduce a similar requirement into the emerging West Oxfordshire Local Plan.
- 4.44 We note that 'significant' development is defined as over 1,000 dwellings or 4,000 sqm of employment floorspace and would suggest that consideration should be given to a lower residential threshold of say 500 dwellings to ensure that training and employment opportunities are provided for local people in a broader range of circumstances.

Policy LEC7 – Best and Most Versatile Agricultural Land

- 4.45 We note that development which results in the loss of BMV land will only be supported in limited circumstances, including where the development meets a demonstrable essential need in the public interest and there is insufficient lower grade land available in other suitable locations.

- 4.46 Whilst we recognise that national policy requires planning policies to recognise the economic and other benefits of the best and most versatile agricultural land, the criteria set out in Policy LEC7 appear to set a very ‘high bar’ including the requirement to demonstrate an essential need that is in the public interest.

Theme 3 Policies - Building Healthy and Sustainable Communities

Policy COM 1: District Wide Housing Distribution

- 4.47 We note that as set out in Table 3, the housing requirement for the period 2020 – 2042 is 20,042 or 911 per annum and that this is based on a combination of Cherwell’s own housing need, using the Government’s previous standard method (15,629) and the 4,400 homes which are already allocated for Oxford’s unmet housing needs.
- 4.48 In terms of the use of the Government’s previous standard method, we note that Cherwell District Council is seeking to utilise transitional arrangements which means that the draft plan will be examined under the previous 2023 version of the NPPF. This is because the proposed housing requirement at 911 homes per year is more than 80% of Cherwell’s increased housing need under the new standard method (1,118 homes per year).
- 4.49 We have no concerns about the proposed approach which appears to align with the transitional arrangements outlined by Government.
- 4.50 We would comment however that whilst the 4,400 homes which have previously been identified and allocated towards Oxford’s unmet housing needs are already committed, the position regarding the quantum of unmet need arising from Oxford is currently unclear and may be subject to change.
- 4.51 We understand that Oxford City Council is formally withdrawing its previous draft Local Plan and will presumably now come forward with a revised plan that aligns with the Government’s new standard method. This in turn, will presumably influence the quantum of housing need that Oxford is not able to meet within its own administrative boundaries which, in turn, may impact on the 4,400 homes previously agreed through the partial review of the Cherwell Local Plan.
- 4.52 It would seem sensible for the text of the plan to recognise this or for the issue to be addressed through a separate topic paper.
- 4.53 In terms of planned supply, we note that the Council’s existing identified housing supply already exceeds the identified housing requirement – an existing supply of 21,402 homes compared to a requirement of 20,042 and yet the intention is to identify a further additional supply of 3,185 homes including windfalls (1,400 homes) a rural allocation (565 homes) and three specific site allocations including 450 homes on land to the south east of Woodstock.
- 4.54 Total planned supply is therefore 24,587 homes in the period 2020 – 2042.

- 4.55 We are concerned that the reason for this is not clearly explained in the draft plan. Paragraph 3.210 states that the Council is planning for additional homes ‘to ensure delivery, provide contingency, meet the plan’s objectives and accord with Government policy and similarly, paragraph 3.204 states that some additional supply is needed to ensure a steady supply of homes including for social and affordable housing.
- 4.56 However, it is not clear why such a significant level of over-supply has been identified. It is also not clear how the 1,400 windfall figure has been calculated which, at, 100 homes per annum, seems very conservative. By comparison, West Oxfordshire’s adopted local plan assumes 125 homes per annum from windfall sites. This is particularly relevant in the context of our concerns regarding the proposed allocation of land to the south-east of Woodstock, which appears to simply not be needed in quantitative terms, particularly if a less pessimistic windfall allowance were to be included in the plan.

Policy COM 2: Affordable Housing

- 4.57 We note the requirement to provide 35% affordable housing at Kidlington and elsewhere in the District. Whilst we have no concerns with this requirement, it is relevant to note, in the context of the proposed allocation of land to the south-east of Woodstock, that the adopted West Oxfordshire Local Plan 2031 requires the provision of 50% affordable housing at Woodstock and within the surrounding sub-area.
- 4.58 If the allocation does go ahead, consideration should therefore be given to setting a higher affordable housing requirement.

General Comments

- 4.59 The remaining housing and other policies set out under this theme are generally supported, in particular the approach taken towards travelling communities (the Oxfordshire local authorities having collaborated on a joint assessment of need) improving health and wellbeing, landscape and the natural and historic environment.
- 4.60 As outlined below, we do however have concerns that the proposed allocation of land to the south east of Woodstock will have an adverse impact on the local landscape and setting of Woodstock and on the setting of the Blenheim Palace World Heritage Site.

Area Strategies

- 4.61 The draft plan five area strategies; Banbury, Bicester, Kidlington, Heyford Park and the Rural Areas.
- 4.62 We have reviewed each of these and whilst generally supportable, we have specific concerns regarding the Kidlington area strategy, including the proposed allocation of 450 homes to the south east of Woodstock.
- 4.63 As a general observation, it is not immediately clear why land on the fringe of Woodstock has been included in the Kidlington area strategy. There is no obvious inter-relationship between the two settlements and they are physically separated by the London Oxford Airport.

- 4.64 It would be more appropriate for the proposed allocation to be identified within the rural area strategy and subject to the policy objectives and stipulations contained therein.
- 4.65 We also question the statement made on page 250 of the draft plan where it says that the strategy will *'deliver a modest, heritage and landscape led residential extension to Woodstock of a scale, layout and design commensurate with the character and significance of this historic market town and the significance of Blenheim World Heritage Site and Blenheim Roman Villa'*.
- 4.66 The adopted West Oxfordshire Local Plan 2031 identifies 3 allocations at Woodstock totalling some 600 homes between them. The proposed allocation of 450 homes on a single site cannot reasonably be described as 'modest'.

Policy KID 1: Kidlington Area Strategy

- 4.67 The supporting text to Policy KID1 helpfully explains the background policy context to planned growth at Woodstock including the West Oxfordshire Local Plan 2031 which allocates three sites, one of which is now complete.
- 4.68 For completeness, the text should also explain the background policy context to the Cherwell Local Plan including the fact that land to the south east of Woodstock was previously proposed to be allocated through the partial review of the Cherwell Local Plan but rejected by the Inspector for a number of reasons including the fact that a further extension of Woodstock in a south-easterly direction would appear incongruous and damage the character and appearance of the area.

Policy KID H1: South-East of Woodstock

- 4.69 We note that the draft plan allocates land to the south-east of Woodstock for the provision of 450 new homes as a 'landscape and heritage led extension of the existing built form of Woodstock'. The proposed policy is lengthy and sets out a raft of requirements reflecting the sensitivity of the site to development.
- 4.70 West Oxfordshire District Council previously objected to the proposed allocation of this site as part of Cherwell District Council's local plan partial review in relation to Oxford's unmet housing needs.
- 4.71 We are not aware of any changes in circumstance to suggest that our previous concerns have been dispelled, indeed for the reasons outlined below, these concerns are considered to be more pressing and relevant than when the matter was last debated.
- 4.72 For the avoidance of doubt, West Oxfordshire District Council objects to the proposed allocation on four main grounds:
- Potential adverse impact on the setting of important heritage assets contrary to national and local policy;
 - Potential adverse impact on the local landscape and setting of Woodstock;

- The distance of the site from Woodstock's key services and facilities and the increased propensity to travel by the private car; and
- The impact of development of this scale on local infrastructure including health, education, car parking and foul water capacity.

4.73 Dealing with each of these points in turn.

Potential adverse impact on the setting of important heritage assets

4.74 The proposed housing allocation adjoins and forms part of the setting of a Grade 1 Registered Park and Garden and the Blenheim Palace World Heritage Site. In addition, Blenheim Villa Scheduled Monument lies within the south-western corner of the site.

4.75 As part of the examination into the Cherwell Local Plan partial review, West Oxfordshire District Council commissioned Chris Blandford Associates (CBA) to examine the issues relating to these historic environment considerations in more detail.

4.76 Importantly, CBA concluded that:

- Although the allocation site does not lie on any identified view lines from the WHS and has limited visual connectivity, it contributes to its setting in two key ways; firstly as an area of open agricultural land it contributes to the wider rural setting of the WHS and secondly, through its contribution to the rural character of approaches towards Blenheim along Upper Campsfield Road;
- The proposed development would result in a significant loss of open agricultural land immediately around the WHS which would affect the generally open rural character of the immediate environs of the Site; a character which contributes to its setting and Outstanding Universal Value (OUV).
- The development would create a substantial extension of Woodstock to the southeast of the town away from its historic core and with no relation to historic or even 20th century patterns of development which exacerbates the sense of intrusion into open countryside.
- The proposed allocation bridges a critical gap between Woodstock and the Oxford Airport – further extending the sense of intrusion into open countryside.
- This marked change and loss of open countryside also needs to be understood in the context of the recent allocation of further development sites through the West Oxfordshire Local Plan 2031 which in themselves will result in a degree of loss to the rural setting of the WHS, with further development likely to substantially degrade the setting of the WHS.
- The proposed development would also have an impact on approaches to the WHS, primarily along Upper Campsfield Road; and potentially in glimpsed views from the A44.

- 4.77 The overall conclusion reached was that the proposed allocation would, on its own have a detrimental impact on the open countryside setting of Blenheim Palace WHS by virtue of its location, size and lack of relationship to existing historic or 20th century urban form.
- 4.78 And furthermore, that this harm needs to be considered cumulatively with three other recent allocations in the West Oxfordshire Local Plan 2031 because when taken together, the four sites would have a significant detrimental impact on the rural character of the setting of the WHS.
- 4.79 Since those submissions were made, there have been a number of material changes in circumstance which serve to further heighten our concerns.
- 4.80 Firstly, two of the allocated sites in the West Oxfordshire Local Plan now have planning permission or a resolution to grant planning permission for an increased quantum of development – land at Hill Rise, 180 homes compared to the allocated 120 and land north of Banbury Road, 235 homes instead of 180.
- 4.81 There is also the Botley West Solar Farm proposal which is being dealt with under the Government’s NSIP regime and has the potential to significantly impact on the setting of the WHS both in its own right and cumulatively taking account of other committed or potential growth.
- 4.82 In this respect, it is relevant to note the conclusions of the report prepared by ICOMOS in March 2024 entitled ‘Urban Expansion in setting of the property’. The report highlights particular concerns regarding the potential for harm to be caused to the setting of Blenheim Palace as a result of the three adopted local plan sites identified in the West Oxfordshire Local Plan 2031 and the draft allocation of land to the south-east of Woodstock which is now being proposed under Policy KID H1.
- 4.83 The ICOMOS report also highlights the further potential impact of the large scale Botley West Solar Farm and suggests that ‘fundamental understanding of the contribution of the setting of the property to its Outstanding Universal Value is not shared across the board by all stakeholders in the management of the property and that the current protection and management system for the setting of the property is not adequate to withstand development pressures in its setting that may affect its Outstanding Universal Value’.
- 4.84 Importantly, in overall terms, the ICOMOS report concludes that:
- The two granted development projects (Land East of Woodstock and Land East of Hill Rise) have already led to cumulative negative impacts on the Outstanding Universal Value of the property through an erosion of its setting;
 - The two projects that have not yet been decided (Land North of Banbury Road and the proposed allocation (KID H1) may further constitute an erosion of the setting of the Outstanding Universal Value of the property and these and other such projects should therefore not be granted until:

- Further studies into the contribution of the setting of the property to the maintenance of its Outstanding Universal Value have been undertaken, and
- Their impacts on the Outstanding Universal Value have been tested through independent Heritage Impact Assessments.

4.85 The report goes on to state that:

- The Blenheim WHS 2017 management plan does not provide an adequate framework for preventing a further erosion of the Outstanding Universal Value through inappropriate changes in its setting in the context of the wider planning and policy context; and
- That offsetting harm to the Outstanding Universal Value against potential benefits through the raising of funding for maintenance is not appropriate to World Heritage properties

4.86 Accordingly, it recommends that a Landscape Character Assessment, specifically focussed on the relationship between the wider setting of the property and its Outstanding Universal Value, be undertaken which would in turn, inform a review of the 2017 management plan.

4.87 The report also expresses concern at the level of development pressure on the immediate setting and wider setting of the property specifically in this context where the property has no buffer zone defined to provide it with an extra layer of protection.

4.88 Importantly, it concludes that the continued erosion of the landscape character of the immediate and wider settings poses an imminent danger of erosion of the contribution of the setting of the property to its Outstanding Universal Value.

Potential adverse impact on the local landscape and setting of Woodstock

4.89 In addition to the heritage related harms outlined above, we also maintain concerns that the proposed allocation will have a detrimental impact on the local landscape and setting of Woodstock.

4.90 As part of its submissions to the Cherwell Local Plan partial review examination, West Oxfordshire District Council appointed Chris Blandford Associates (CBA) to also undertake a landscape and visual review of the site.

4.91 Importantly, CBA concluded that development would harm the setting and significance of the scheduled monument and would have a detrimental impact on the open countryside setting of the Blenheim Palace World Heritage Site by virtue of its location, size and lack of relationship to existing historic or 20th century urban form.

4.92 They also found that proposing a ‘finger’ of housing extending out into the countryside would result in development which would relate poorly to the existing settlement pattern. Ultimately, the poor relationship with the urban edge and the landscape sensitivities of the site led them to state that development should be resisted on this site.

4.93 Having heard the evidence from West Oxfordshire District Council and others, importantly, the Local Plan partial review Inspector in his final report, stated that: *'The site itself has difficulties in that as a result of recently approved housing that is under construction, the south-east boundary of Woodstock is well-defined. Its further extension in a south-easterly direction would appear incongruous and damage the character and appearance of the area'*.

4.94 Whilst we note that the indicative layout of the site has been amended since the partial review, Officers consider that, if anything, this would result in a more incongruous form of development which is separated from the existing built form and would effectively result in an isolated, free-standing area of built development that relates poorly to the town.

The distance of the site from Woodstock's key services and facilities

4.95 Given the distance of the proposed development from the centre of Woodstock, from Kidlington and from the main local services and facilities, the proposed allocation could result in a separate, relatively isolated housing estate, where travel by car will be the main means of transport.

4.96 The National Planning Policy Framework (NPPF) emphasises that plans should promote a sustainable pattern of development that:

- Meets the development needs of the area,
- Aligns growth with infrastructure,
- Enhances the environment, and
- Mitigates and adapts to climate change, including through the effective use of land in urban areas.

4.97 While national policy supports the delivery of new homes through significant extensions to towns and villages, paragraph 77 of the NPPF makes clear that housing needs must be met in a sustainable way, on well-located sites supported by necessary infrastructure and facilities—including a genuine choice of transport modes.

4.98 Increasingly, UK planning and health professionals, including the RTPi and TCPA, advocate for the 20-minute neighbourhood concept as a benchmark for sustainable development. This internationally recognised approach ensures that residents can access essential services—such as shops, schools, leisure facilities, green spaces, and employment—within a 20-minute walk (approximately 800m) of their homes.

4.99 However, this proposed site falls well outside this threshold:

- The centre of Woodstock is approximately 1.6km away.
- The nearest primary school is around 1.4km away.
- The local secondary school is 1km away.
- Key services and facilities in Kidlington are even further.

- 4.100 Even with high-quality pedestrian and cycle links, these distances suggest a development that would significantly rely on car travel and would likely exacerbate known parking capacity constraints in the town's principal off-street public car park in Hensington Road. This concern is compounded when considering journeys beyond Woodstock to access higher-order services, facilities, and employment. The Partial Review Local Plan Inspector raised similar concerns when assessing potential locations for Oxford's unmet housing need (see paragraphs 53 and 54 of his report).
- 4.101 Given its peripheral and relatively isolated location, the proposed development fails to align with the principles of sustainable development as outlined in the NPPF. A more strategically located site - one that better integrates with existing infrastructure and services - would be more appropriate in ensuring a truly sustainable, accessible, and well-connected community.

The impact of development of this scale on local infrastructure

- 4.102 Finally, we have concerns that the proposed allocation is likely to place an unsustainable burden on the town's already stretched infrastructure. The proposal fails to demonstrate how essential services—including education, healthcare, and foul water capacity—will adequately accommodate the additional population.
- 4.103 The proposed development cannot be assessed in isolation, as it forms part of a wider pattern of growth in and around Woodstock. Significant new housing has already been committed in the area, placing additional pressure on essential services. Without corresponding investment in infrastructure, this further development risks exacerbating existing capacity issues.
- 4.104 There are well-documented concerns about the capacity and quality of the existing GP surgery in Woodstock, which is already struggling to meet the needs of the current population. The proposed development fails to include any new on-site healthcare provision, meaning residents would have to rely on a service that is already overstretched.
- 4.105 This could lead to longer waiting times and reduced access to primary care, ultimately undermining community well-being.
- 4.106 The proposed site is not supported by any new on-site education provision, despite the substantial increase in housing numbers. The nearest primary and secondary schools are already facing capacity constraints, and it is unclear how additional pupil demand will be met.
- 4.107 Without guaranteed investment in school places, this development risks displacing local children or forcing them to travel further afield for education, which is neither sustainable nor in the best interests of the community.
- 4.108 There are also known concerns regarding the capacity of the foul water drainage system in the area and the addition of 450 new homes is likely to place further pressure on already constrained infrastructure. The proposal does not include clear evidence that adequate foul water capacity exists or that necessary upgrades will be delivered in time to mitigate the impact of development.

4.109 Furthermore, aside from green space, the development fails to provide any significant on-site infrastructure to support the new community. There is no provision for healthcare, education, or community facilities, meaning all essential services must be accessed off-site, placing even greater pressure on existing resources. This lack of supporting infrastructure further highlights the unsustainable nature of the proposal.

Conclusion

4.110 While we are broadly supportive of the submission draft plan, including its overall vision, objectives, and many of the proposed thematic policies, we have serious concerns about the Kidlington Area Strategy—particularly the proposed allocation of 450 homes to the south-east of Woodstock.

4.111 We acknowledge the intention to provide a housing supply buffer beyond the identified requirement. However, given the sensitive nature of this site, we strongly believe it should not form part of any such buffer and that instead, the 450 homes identified should form part of a less pessimistic windfall allowance. The suitability of this location for development has been tested multiple times, both through development management decisions and the plan-making process, with the consistent conclusion that it is not appropriate for development.

4.112 There are significant concerns, particularly regarding heritage and landscape impact, with the potential for substantial harm to the setting of Blenheim Palace World Heritage Site (WHS). The ICOMOS report (March 2024) reinforces this concern, highlighting in particular, the cumulative impact of committed and potential development in the area.

4.113 Although the proposed illustrative form of development has been modified to address the sensitivity of the site's southern section, this has only resulted in a more incongruous and isolated area of development, effectively creating a self-contained enclave disconnected from the existing settlement.

4.114 Additionally, we have major concerns about the site's distance from key services and facilities, which will inevitably increase reliance on car travel, directly undermining the draft plan's sustainable travel ambitions and placing additional pressure on car parking capacity in Woodstock.

4.115 Beyond transport concerns, the delivery of a further 450 homes on the edge of Woodstock will place significant strain on local infrastructure, including healthcare, education and foul water capacity. The existing services are already struggling to meet current demand, and apart from green space, there appears to be little or no on-site infrastructure provision as part of the proposed development. This will only exacerbate pressure on already overstretched facilities.

4.116 We trust that these concerns will be given full consideration in determining whether to submit the draft plan for examination. Should the plan proceed to examination, the District Council requests to attend any subsequent hearing sessions regarding the land south-east of Woodstock.