

## Proposed allocations of land for new housing at Woodstock, Oxfordshire, in the Cherwell District Plan to 2032: Additional heritage issues for consideration at EIP: Matter 8 - Woodstock

### 1 Introduction

1.1 A number of important developments impacting on the above proposals have occurred since our original report was prepared in October 2017. This short addendum addresses these. We trust that the Inspector will give due regard to these matters when determining his response to the draft District Plan.

### 2 Cherwell Proposed Site PR10 – increase in housing numbers allocated

2.1 In February 2018 Cherwell District Council published numerous changes to the draft Plan.<sup>1</sup> Focused changes FC08 and FC71-FC84 inclusive address Policy PR10 – Land South East of Woodstock. Most significantly, the revisions replace the originally planned 410 homes on the site with 500, an increase 18% on this site's allocation. The extra 90 houses would also increase Woodstock's overall allocation of new homes by 8.34%, from 1080 to 1170, if all four sites (ie Cherwell PR10, plus sites EWC1c-e in the West Oxfordshire Plan) are developed. That would be the clear purpose both of the draft plans as currently constituted, and of the Blenheim Estate as sponsors of the allocation sites. In our opinion the plans already represent significant over-development of a small and distinctive historic market town.

2.2 Cherwell's Partial Review seeks to justify the increase from 410 to 500 new houses on site PR10 as an 'improvement and reconfiguration of [the] residential area to respond to archaeological issues' (FC08 and FC71). The original plan for site PR10 proposed a rectangular development area occupying most of the northern half of the field in the north-west angle between the A44 and A4095. The revised plan has been reduced in area towards the north-east corner of the field because of concerns about below-ground archaeology, but has been expanded considerably to the south to compensate for this. There is a clear potential for conflict with the Blenheim Villa Scheduled Monument: the proposed new area for development comes very close to this, and the precise limits of the SM will be very difficult to demarcate accurately on the ground. Furthermore the revised plan will create a much broader built frontage towards the A4095, as well as a much longer one towards the A44. This will also be much closer to the development area now, with housing gradually receding towards the north-east corner of the field. It is difficult to determine on plan alone whether the overall development area is the same as before – which would mean a higher density of house per hectare – or whether it has actually expanded to give the same density but over a larger area. FC73 actually confirms that the new plan represents **both** a higher density and within a larger area: 500 houses on 16.3ha (30.675 houses per hectare) as opposed to 410 on 16ha (25.625 houses per ha). The additional 90 homes seems to be an opportunistic (one might even say cynical) attempt to add further build capacity into a site which would already have placed great pressure on the local environment and infrastructure.

2.3 FC72, FC80 and the revised site plan for PR10 removes all reference to retained agricultural land. The undeveloped area is therefore all shown as 'new green space/parks'. The plan therefore accepts that this land will no longer be available for any agricultural use – an important loss in the definition of Woodstock within its rural context. Green space/parks are not the same as farmland are

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<sup>1</sup> Cherwell District Council 26 February 2018, *Partial Review of the Cherwell Local Plan 2011-2031 Oxford's Unmet Housing Needs – Appendix 3*

<http://modgov.cherwell.gov.uk/documents/b8008/Submission%20of%20the%20Partial%20Review%20of%20the%20Cherwell%20Local%20Plan%202011-2031%20Oxfords%20Unmet%20Housing%20Needs%20-.pdf?T=9>

certainly are perceived differently by residents, users and travellers passing along the road network. Our fears over erosion of the town's rural fringe has been vindicated. FC80 also suggests that the green space should be secured in this use permanently through the planning process. It only refers to 'proposals' which shall be include din the application. Unfortunately it is difficult to have confidence in the planning system's willingness or ability to enforce this in perpetuity. It is hard to avoid the conclusion that some at least of the remaining undeveloped land would come under pressure for further housing in the future.

### **3 Outline and detailed approval of development on West Oxfordshire allocation site EW1c**

3.1 A second major change to the local development context saw West Oxfordshire District Council grant outline planning permission to the Trustees Of The Vanbrugh Unit Trust And Pye Homes (Oxford) Ltd (in essence the Blenheim Estate) for the construction of up to 300 houses on site EW1c, immediately adjacent to site PR10 on its west wide (planning reference 16/01364/OUT). This approval was given on 21 May 2018, long in advance of any likely determination of that District Council's own local plan revision for unmet housing need. That application saw all matters reserved except for means of access in respect of new junction arrangements. There have been three subsequent applications furthering the overall development proposals (18/02255/SCREEN, 18/02484/S73 and 18/02335/CND). The first and second sought full permission for construction of the first 46 houses (this first phase will occupy all the land alongside the A44, with houses on and close to most of this important frontage); the third sought to discharge many of the planning conditions on the original grant. These applications await decisions, but the publication of a signed and sealed Section 106 legal agreement on 11 January 2019 suggests that approvals will not be long in coming.<sup>2</sup> If and when development commences, the die will be cast. See Appendix 1 for the phased development plan, with the first 46 houses shown, as taken from the Section 106 agreement.

### **4 Potential impacts of development on the Blenheim World Heritage Site**

4.1 Blenheim Palace (including its Park) is a World Heritage Site. This designation provides international recognition of the outstanding universal value of a small number of exemplar sites around the world. Designation is carried out by UNESCO, an international non-governmental body dedicated to the preservation and conservation of cultural heritage sites. ICOMOS UK monitors development and other threats to the small number of World Heritage Sites in the United Kingdom. ICOMOS UK has long been concerned with the potential for large-scale housing development in and around Woodstock, and has criticised several previous attempts to build large numbers of houses on the south-east side of the town. This has included earlier plans for site EW1c. ICOMOS UK objected to the proposal to develop site EW1c because they considered that it would have a detrimental impact on the outstanding universal value of the Blenheim Palace World Heritage Site. They also noted that the site did not exist in isolation, but could all too easily become part of a longer corridor of development. This was noted as a major concern. In their words,

"we have explained as clearly as possible why we consider that the application site should remain undeveloped ... The concerns raised by the present application would be greatly increased by any future attempt to resurrect larger-scale development proposals of the kind for which consent was refused in September 2015 and which we strongly opposed. Any decision to approve the current application should be taken not as a precedent but as allowing the existing settlement to be satisfactorily terminated against an historic boundary. Beyond

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<sup>2</sup> West Oxfordshire District Council 18/02484/S73 S106-685193 [https://publicaccess.westoxon.gov.uk/online-applications/files/C1E993EEC5527C4FE541CC10B6DF5282/pdf/18\\_02484\\_S73-S106-685193.pdf](https://publicaccess.westoxon.gov.uk/online-applications/files/C1E993EEC5527C4FE541CC10B6DF5282/pdf/18_02484_S73-S106-685193.pdf)

this, a halt should be called to all further development before progressive salami-slicing of the remaining open land results over time in its entire loss”.

4.2 Woodstock Town Council also objected to the application to build up to 300 houses on site EW1c, and agrees with ICOMOS UK that it should remain undeveloped. It also considers (as ICOMOS UK clearly does) that the cumulative effect of extensive house-building around Woodstock is immense and will be a direct threat to the outstanding universal value of the Blenheim Palace World Heritage Site. ICOMOS UK stressed in the strongest terms that site EW1c, were it to be permitted, must be the end of development on the south-east side of Woodstock. Their term was salami slicing, and that is most relevant now. If Site PR10 comes forward for development, the town boundary will have been pushed out to the A4095. Surviving agricultural land will have been lost to housing; a development corridor will open up to Oxford International Airport, Yarnton, and ultimately Oxford itself. Woodstock Town Council firmly believes that suburbanisation of the green belt between Wolvercote and Woodstock is an existential threat to the character and identity of the historic market town, as well as to Green Belt around the city. The council acknowledges that proposal site PR10 is not Green Belt land but considers that it nevertheless forms part of a vital ‘green lung’ around both the town and the World Heritage Site. Its development, alongside the now-permitted EW1c (to say nothing of EW1d-e), places a direct threat to both. It is out firm belief that PR10 is an inappropriate site for development in its own right, but doubly so in the context of cumulative impacts on the historic and green environment of Woodstock and Blenheim Palace.

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**Appendix 1: Development plan for site EW1c under planning application**



