



## West Oxfordshire Local Plan Examination

### WOODSTOCK TOPIC PAPER

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## **I. Introduction**

- I.1 In November 2016 the Council published a series of proposed main modifications to the pre-submission draft West Oxfordshire Local Plan 2031 to take account of a proposed uplift in the overall housing requirement from 10,500 homes to 15,950 homes.
- I.2 This included the allocation of 15 'non-strategic' housing sites with 3 sites identified at Woodstock; Land east of Woodstock (300 homes), Land north of Hill Rise (120 homes) and Land north of Banbury Road (250 homes).
- I.3 A number of representations were received with the main issues of concern being as follows:
- The potentially adverse impact of proposed development on the setting of Blenheim Palace World Heritage Site (WHS) including key views;
  - No evidence that the public benefits of the proposals outweigh the likely harms;
  - Insufficient evidence/analysis of the landscape and heritage impact of the proposed allocations;
  - That the precautionary principle should be applied because there are alternative sites available;
  - Concern that the proposed scale of growth is too much for a town of Woodstock's size and is also inconsistent with the overall spatial strategy;
  - Impact on local services and facilities (education, health, parking etc.) and their capacity to absorb additional growth;
  - Traffic impact particularly congestion on the A44 to Oxford;
  - Concern about the cumulative impact of growth including further potential growth on the edge of Woodstock in adjoining Cherwell District;
  - Potential impact on Blenheim Park Site of Special Scientific Interest (SSSI) and Woodstock Water Meadows Local Wildlife Site (LWS); and
  - Loss of important open space.
- I.4 The merits of the three proposed Woodstock allocations and the Eynsham – Woodstock sub-area strategy more generally were discussed during the Stage 3 - Matter 14 examination hearing session held on 18 July 2017. During the hearing session it was agreed that it would be appropriate for the Council to undertake further landscape and heritage assessment of the proposed allocations at Woodstock to better understand their potential impact including in relation to the Blenheim Palace WHS.
- I.5 In its post-hearing letter to the Inspector of 3 August 2017 (WOLP63) the Council confirmed that it would undertake a further landscape and heritage appraisal of the Woodstock allocations together with the four sites proposed in the Burford – Charlbury sub-area within the Cotswolds Area of Outstanding Natural Beauty (AONB).
- I.6 Independent consultants Chris Blandford Associates (CBA) were subsequently appointed in August 2017 and their report has been made available separately alongside this topic paper.

- 1.7 The purpose of this topic paper is to consider the findings of the CBA report in the context of national policy requirements regarding the historic environment and to consider more generally the justification for additional housing growth at Woodstock in the period up to 2031.
- 1.8 This topic paper will be published for consultation alongside the CBA report, a separate topic paper relating to development within the Cotswolds AONB and a further Sustainability Appraisal (SA) addendum report.
- 1.9 Any responses received to this topic paper and the other consultation documents listed above will be considered by the Inspector in setting out his thoughts on the most appropriate way forward for the Local Plan.

## **2. Background**

- 2.1 The pre-submission draft Local Plan was formally published in March 2015 and submitted for examination in July 2015. Examination hearing sessions were held in November 2015 and the Inspector's interim findings were published in December 2015. These findings raised particular concerns about the overall housing requirement being too low and the examination was subsequently suspended for 12 months from January 2016.
- 2.2 Following further work undertaken in 2016 (including in relation to the apportionment of unmet housing need from Oxford) the Council published a series of proposed main modifications to the submission draft Local Plan in November 2016. The majority of proposed modifications related to an increase in the overall housing requirement from 10,500 homes to 15,950 homes (including 2,750 homes for Oxford's 'unmet' housing needs).
- 2.3 To achieve this uplift the proposed modifications sought to increase the number of homes on several existing strategic allocations including North Witney, East Witney and Land East of Chipping Norton (Tank Farm), identify two new strategic allocations including West Eynsham and the Oxfordshire Cotswolds Garden Village and also to allocate 15 smaller 'non-strategic' sites, ranging in size from 25 homes to 300 homes.
- 2.4 These 15 non-strategic allocations include three sites at Woodstock as follows:
- Land east of Woodstock – 300 homes (Policy EW1c)
  - Land north of Hill Rise, Woodstock – 120 homes (Policy EW1d)
  - Land north of Banbury Road, Woodstock – 250 homes (Policy (Policy EW1e)
- 2.5 The sites were allocated following positive evaluation through the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) and Sustainability Appraisal undertaken in 2016. All three sites are in the same land ownership - the Blenheim Palace Estate (BPE).

## **Land East of Woodstock (300 homes)**

- 2.6 The Site is a 17ha arable field on the eastern edge of Woodstock. It has residential development immediately to the west, the A44 Oxford Road to the south, a playing field and school to the north, and farmland to the east. The Site lies immediately to the east of the Blenheim Palace World Heritage Site (WHS), and Grade I Registered Historic Park and Garden.
- 2.7 Policy EW1c as published through the proposed modifications in November 2016 envisages the provision of around 300 new homes including affordable housing with vehicular access to be provided from the A44 Woodstock Road supported by appropriate pedestrian and cycle connections and provision of supporting infrastructure. The draft policy emphasises the need to ensure development does not have a harmful impact on designated heritage assets and the setting of the Blenheim Palace World Heritage Site (WHS). It also emphasises that harm should be avoided to the Blenheim Park SSSI.
- 2.8 A hybrid planning application for the site was received in April 2016 (16/01364/OUT) comprising an outline planning application for up to a maximum of 300 residential dwellings, up to 1,100 sqm of associated infrastructure, engineering and ancillary works, provision of public open space and formation of vehicular accesses and a full planning application for the development of phase 1 comprising 46 residential dwellings (46 of the 300 described above) with associated infrastructure and engineering works.
- 2.9 In responding to the application in July 2016, ICOMOS (the International Council on Monuments and Sites) concluded that the Outstanding Universal Value (OUV) of the Blenheim Palace WHS would not be significantly compromised by the proposed development. They did however express a principal concern regarding the further erosion of the surviving open setting of the WHS south east of Woodstock.
- 2.10 Historic England responded to the application in May 2016 stating inter alia that it would result in a degree of harm but that that harm is clearly less than substantial and best described as moderate. Nonetheless, as there would be some harm caused, planning permission should only be granted if the public benefits outweigh the harm.
- 2.11 In a further response in June 2016, Historic England confirmed that in their view the money raised through the proposed development (a proportion of which would be used to assist with the upkeep of the Blenheim estate) would entail a significant public benefit which would outweigh what Historic England regard as moderate to low harm in heritage terms.
- 2.12 In responding to the proposed allocation of the site through the proposed main modifications published in November 2016 Historic England stated that they had no comment to make on the principle of the allocation but did welcome and support criterion b) regarding the Blenheim Palace World Heritage Site.

- 2.13 The hybrid planning application (16/01364/OUT) was subsequently considered by the Council's planning committee in February 2017 and secured a resolution to grant planning permission subject to a Section 106 legal agreement.

### **Land North of Hill Rise, Woodstock (120 homes)**

- 2.14 The Site is a 10.23ha arable field on the northern edge of Woodstock. It has arable fields to the north, east and south east. The north westernmost edge of the Site lies adjacent to the Blenheim Palace World Heritage Site (WHS), and Grade I Registered Historic Park and Garden.
- 2.15 Policy EW1d as published through the proposed modifications in November 2016 envisages the provision of around 120 new homes including affordable housing with appropriate vehicular access and pedestrian and cycle connections as well as the provision of supporting infrastructure and replacement/enhancement of the existing children's play area and public open space adjacent to Rosamund Drive. The draft policy emphasises the need to ensure that the development does not have a harmful impact on the setting of the Blenheim Palace World Heritage Site (WHS).
- 2.16 In responding to the proposed main modifications published in November 2016, Historic England stated that they had no comment to make on the principle of the allocation but did express support for criterion b) regarding the setting of the Blenheim Palace World Heritage Site (WHS).
- 2.17 No planning applications have been received for this site to date.

### **Land North of Banbury Road, Woodstock (250 homes)**

- 2.18 The Site is a 16.9ha group of 3 fields on the northern edge of Woodstock. It has residential development immediately to the south, and the Banbury Road forms the eastern and south-eastern edge of the Site. To the west, it is bounded by Green Lane, a narrow road which leads to the sewage works, and to the north is open arable farmland.
- 2.19 Policy EW1e as published through the proposed modifications in November 2016 envisages the provision of around 250 new homes including affordable housing together with the provision of vehicular access from Banbury Road and Green Lane together with appropriate pedestrian and cycle connections and supporting infrastructure. The policy emphasises the importance of ensuring that development does not have a harmful impact on the setting of the Blenheim Palace World Heritage Sites (WHS) including key views.
- 2.20 In responding to the proposed main modifications published in November 2016, Historic England stated that they had no comment to make on the principle of the allocation but did express support for criterion d) regarding the setting of the Blenheim Palace World Heritage Site (WHS).

### 3. Relevant Policy Considerations

- 3.1 There are a number of relevant policy considerations to take into account in assessing the merits of the three proposed allocations at Woodstock however the main issue/concern which has been raised through consultation responses to date is that of the historic environment including in particular the potential effect of the proposed developments on the setting of the Blenheim Palace World Heritage Site (WHS).

#### **National Planning Policy Framework (NPPF)**

- 3.2 Paragraph 126 of the NPPF states inter alia that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.
- 3.3 Paragraph 129 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
- 3.4 Paragraph 132 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
- 3.5 Paragraph 133 goes on to state that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- the nature of the heritage asset prevents all reasonable uses of the site; and
  - no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

- the harm or loss is outweighed by the benefit of bringing the site back into use.

3.6 Paragraph 134 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

### **Blenheim Palace World Heritage Site Revised Management Plan (2017)**

3.7 A World Heritage Management Plan has been produced for Blenheim Palace which aims to sustain and conserve the outstanding universal value of the Site, recognising the wide variety of possible benefits achievable through positive management. The first management plan was published in 2006 and was a pioneering document, delivering both the requirements of a World Heritage Site Management Plan and those of a Heritage Management Plan in one integrated approach.

3.8 A revised management plan was published in 2017 based on guidelines produced by UNESCO, ICOMOS and Central Government through its guidance relating to the NPPF as well as information produced by its advisers Historic England and Natural England.

3.9 The revised management plan has been made available as part of the Local Plan examination library (ENV15). In particular, it seeks to:

- Define the detail and key elements of the Outstanding Universal Value (OUV) of the WHS;
- Ensure that the original vision still reflects the right direction for sustaining the OUV and significance;
- Understand any current issues that might be affecting OUV and significance;
- Revise, where necessary, the management objectives to ensure they accord with current levels of understanding;
- Update the Action Plan to reflect the priorities over the coming 10 year period.

3.10 The plan includes 33 management objectives with associated actions. Objective 1 is to maintain, conserve and enhance the OUV of the World Heritage Site.

3.11 Of particular relevance to this topic paper and the Council's proposed allocations at Woodstock, are management objectives 7 – 10 which relate to the setting of the World Heritage Site. Objective 8 for example is to 'ensure that Blenheim Palace is adequately protected from development that is incompatible with the unique status and character of the WHS and national heritage assets'.

3.12 Objective 10 is to 'ensure that appropriate policies to protect the WHS are included in the draft West Oxfordshire Local Plan 2031'.

3.13 As part of the management plan review a setting study was completed and included as Appendix 3 of the management plan. The study seeks to bring together all local and national

landscape character descriptions to help define the character of the setting of the WHS and to show how the OUV of the WHS is largely defined by what lies within the park wall, rather than what lies outside it.

- 3.14 Given its importance in helping to sustain and enhance the significance of the World Heritage Site, the involvement of key stakeholders and its on-going monitoring and reviewing, the Management Plan is a material planning consideration when assessing development proposals in accordance with relevant policies of the Local Plan.

### **West Oxfordshire Local Plan 2031 including Proposed Main Modifications (November 2016)**

- 3.15 The proposed main modifications to the pre-submission draft Local Plan 2031 were published in November 2016. Other than the three proposed non-strategic allocations at Woodstock, of particular relevance to this topic paper is Policy EH7 – Historic Environment which states that:

***‘All development proposals should conserve or enhance the special character, appearance and distinctiveness of West Oxfordshire’s historic environment, and conserve or enhance the District’s heritage assets, and their significance and settings’.***

And that:

***‘Considerable weight and importance will be given to conserving the intrinsic universal values for which Blenheim Palace and Park is inscribed as a World Heritage Site (WHS), as guided by its WHS Management Plan’.***

- 3.16 Policy EW1 – Blenheim World Heritage Site is also of particular relevance stating that:

***‘The exceptional cultural significance (Outstanding Universal Value) of the Blenheim World Heritage Site will be protected, promoted and conserved for current and future generations’***

And that:

***‘In accordance with the National Planning Policy Framework, great weight will be given to the conservation of the World Heritage Site and any harm or loss to its significance will require clear and convincing justification. Development proposals that would lead to substantial harm to or loss of those attributes and components of the Site will be unacceptable, unless it can be demonstrated that any such harm or loss is necessary to achieve substantial public benefit that outweigh that harm or loss. Such harm will be wholly exceptional. Where development proposals would lead to less than substantial harm to those attributes and components, that harm will be weighed against the public benefits of the proposals’.***

- 3.17 And also that:

***‘Consideration of impact will be made of proposals within, or potentially affecting, the World Heritage Site and its setting, including areas identified as being of special importance for the preservation of long distance views to and/or from the Site (as shown on the Blenheim Palace Management Plan). Particular regard will be given to the design quality of the proposal (including scale, form and massing), its relationship***

**to context (including topography, built form, views, vistas and effect on the skyline) and the implications of the cumulative effect of changes’.**

- 3.18 In September 2017 the Council submitted a schedule of further suggested main modifications to the Local Plan Inspector to address various issues that arose during the hearing sessions held in May and July 2017. These are suggested changes only and have yet to be considered or accepted by the Inspector. Of particular relevance however are the suggested changes to Policy EH7 – Historic Environment which state that:

**‘All development proposals should conserve and/or enhance the special character, appearance and distinctiveness of West Oxfordshire’s historic environment, including the significance of the District’s heritage assets, in a manner appropriate to their historic character and significance and in a viable use that is consistent with their conservation, in accordance with national legislation, policy and guidance for the historic environment’.**

And that:

**‘In determining applications, considerable weight and importance will be given to conserving and/or enhancing the significance of designated heritage assets, including:**

**- the intrinsic universal values for which Blenheim Palace and Park is inscribed as a World Heritage Site (WHS), as guided by its WHS Management Plan (see also Policy EWI)’.**

And also that:

**‘Proposals which would harm the significance of a designated asset will not be approved, unless there is a clear and convincing justification in the form of substantive tangible public benefits that clearly and convincingly outweigh that the harm, using the balancing principles set out in national policy and guidance’.**

- 3.19 A minor modification has also been proposed to Policy EWI – Blenheim World Heritage Site to state that:

**‘In accordance with the National Planning Policy Framework, great weight will be given to the conservation of the Outstanding Universal Value of the World Heritage Site and any harm or loss to its significance will require clear and convincing justification. Development proposals that would lead to substantial harm to or loss of those attributes and components of the Site will be unacceptable, unless it can be demonstrated that any such harm or loss is necessary to achieve substantial public benefit that outweigh that harm or loss. Such harm will be wholly exceptional. Where development proposals would lead to less than substantial harm to those attributes and components, that harm will be weighed against the public benefits of the proposals’.**

## **4. The Principle of Further Planned Housing Development at Woodstock**

- 4.1 The draft Local Plan 2031 adopts a hierarchal settlement strategy with three main towns (Witney, Carterton and Chipping Norton) six rural service centres (Bampton, Burford, Charlbury, Eynsham, Long Hanborough and Woodstock) 33 villages and a number of smaller villages and hamlets.
- 4.2 As a designated rural service centre Woodstock has a population of around 3,100 people<sup>1</sup> and an excellent range of services and facilities including post office, shops, primary and secondary schools, public houses, community buildings, library, GP surgery, fire station, employment opportunities, open space and built sports facilities.
- 4.3 Woodstock is an important tourist destination thanks in large part to Blenheim Palace, the District's largest visitor attraction and a major contributor to the local economy both in terms of employment and spending. Its location, immediately next to Woodstock, combined with the attractive character of the town itself, has resulted in tourism being especially important to Woodstock's livelihood.
- 4.4 In terms of available services and facilities, as set out in the Council's 2016 Settlement Sustainability Report (OTH15) Woodstock ranks as the 5th most 'sustainable' settlement in the District, ranking behind only Witney, Carterton, Chipping Norton and Eynsham using both a 'weighted' and 'unweighted' analysis.
- 4.5 Woodstock also enjoys excellent accessibility and transport links. It is around 7km from the northern edge of Oxford adjoining the A44 which connects with the London-Oxford airport to the south east and on through Begbroke and Yarnton to Oxford.
- 4.6 The A44 is featured in the Local Transport Plan's Oxford Transport Strategy in the interest of accommodating 'rapid transit' connections to Oxford and developing a new Park and Ride strategy. Land at the Woodstock/Bladon/airport junction on the A44 is identified in the Oxford Transport Strategy as a location for a new Park and Ride.
- 4.7 The study also provides for the upgrading of the existing national cycle way between Woodstock and Oxford along the western side of the A44 and linking to a new 'Super Cycleway' serving Oxford via Kidlington. The County Council's A44/A4260 Corridor Study identifies improvements to the A44 corridor in the interest of achieving a 'modal shift' to more sustainable forms of transport.

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<sup>1</sup> 2011 Census

- 4.8 In addition to proposed improvements to the A44, Woodstock enjoys good access to railway stations at Hanborough and Tackley as well as the Oxford Parkway station and Water Eaton Park and Ride.
- 4.9 The town has an older demographic profile with just over 20% of residents being 65 – 85 years old and just over 5% being 85+ years old. Despite this the town has a good resident working population of around 1,600 people.
- 4.10 The Council’s Economic Snapshot and Outlook report of 2015 (ECONI) highlights the fact that Woodstock has a strong functional relationship with the Oxford City region economy. One of the main local employers Owen Mumford employs around 300 people at its Green Lane headquarters in Woodstock. In addition to manufacturing, Woodstock has several quality office employment sites in converted agricultural buildings including the Cowyards on the A44 Oxford Road and the Quadrangle on Banbury Road.
- 4.11 ECONI highlights the proximity of the Eynsham – Woodstock sub-area to Oxford and identifies that the growth of the city region is a major opportunity for this sub-area going forward. It goes onto state that the employment forecasts suggest growth can be most readily attracted to Eynsham, Woodstock and to Witney. As a specific recommendation, ECONI suggests that the Local Plan should identify and allocate new sites in particular in the Eynsham – Woodstock sub-area to capture growth in the Oxford City region. It highlights that around 30% of workers in this sub-area work in Oxford.
- 4.12 Despite the economic strength of Woodstock and the sub-area within which it sits, there have been very few housing completions in recent years. In the first six years of the Local Plan 2011 – 2017 just 168 dwellings have been completed with a particularly low number of completions in 2014/15 and 2015/16 as shown in the table below.

| <b>Year</b>  | <b>Number of housing completions</b> |
|--------------|--------------------------------------|
| 2011/12      | 47                                   |
| 2012/13      | 41                                   |
| 2013/14      | 10                                   |
| 2014/15      | 2                                    |
| 2015/16      | 2                                    |
| 2016/17      | 64                                   |
| <b>Total</b> | <b>168</b>                           |

- 4.13 This represents an average of just 28 dwellings per year in the six-year period 2011 – 2017.
- 4.14 During this period the number of new affordable homes completed was just 52 units. To compound this, viability evidence prepared in support of the Local Plan (VIAB6) has identified that Woodstock has some of the highest house prices in the District.

- 4.15 The Council considers that Woodstock is a sustainable location that is capable of accommodating a more significant level of new housing development than has taken place in recent years which will also enable the delivery of new affordable homes.
- 4.16 The town has an excellent range of services and facilities, significant economic potential with strong linkages to Oxford and the City region economy and enjoys excellent accessibility along the A44 corridor which is the subject of major planned improvements through the Local Transport Plan.
- 4.17 It is fully acknowledged however that any development which comes forward at Woodstock needs to have close regard to any potential impact on the Blenheim Palace World Heritage Site (WHS) and its setting, including cumulative impact as well as the potential impact on other designated and non-designated heritage assets. Section 5.0 below summarises the key findings and recommendations of the independent landscape and heritage advice which has been commissioned by the Council.

## **5. Landscape and Heritage Assessment – Summary of Key Findings and Recommendations**

- 5.1 The Council has commissioned independent advice from specialist landscape and heritage consultants Chris Blandford Associates (CBA) on the potential landscape and heritage impact of the three proposed allocations at Woodstock. Their report is available separately and the main findings and recommendations are summarised in relation to each site and potential cumulative impact below.

### **Land East of Woodstock**

- 5.2 The CBA report identifies that in overall landscape terms, the site is of medium landscape sensitivity and medium visual sensitivity. It suggests that in landscape and visual terms a development of approximately 270 homes could be successfully accommodated on the site, ensuring that development is generally of low density. The report makes a series of recommendations as to how the impact of development could be minimised in landscape and visual terms.
- 5.3 In heritage terms the CBA report identifies that development of the Site would not have an impact of note on the setting of the Woodstock Conservation Area or any of the listed buildings within the Conservation Area. It highlights that it could however affect the setting of the Blenheim Palace WHS and Registered Historic Park and Garden, the setting of the listed Cowyard buildings and the setting of the Blenheim Villa Scheduled Monument.
- 5.4 In relation to the Blenheim Villa Scheduled Monument, the report concludes that development of the Site could significantly change the open rural character of the monument's setting but that this would have only a limited impact on the significance of the asset, given the limited contribution the setting of the asset makes to its significance. This is not considered by CBA to be a major issue for the allocation of the Site.

- 5.5 With the Cowyard listed buildings the issue is predominantly one of potential visibility and visual encroachment into their rural / parkland setting. CBA identify that the intervening vegetation between the complex and allocation site should reduce the risk of significant visual intrusion, but recommend that should development be promoted on the Site then significant additional planting should be included along the frontage with the A44 to minimise potential visual issues. They consider that this would also help reduce visual impacts on the setting of the Registered Historic Park and Garden / WHS.
- 5.6 In terms of the potential impact on the WHS and hence Registered Historic Park and Garden the CBA report identifies that the development of the Site has the potential to notably alter the wider rural setting of the WHS and to affect the approach along the A44 if the whole site were to be built out to around 510 units. It identifies that the proposed allocation of 300 homes would still result in a significant new development. The report also identifies that the risk to the setting of the WHS is exacerbated by potential cumulative/combined impacts associated with the two other proposed allocations.
- 5.7 To address the potential risk the report recommends that the overall scale of the Site is reduced and / or a reduced capacity is allocated for the Site as this would reduce the loss of rural landscape and reduce potential impacts on the WHS and its Outstanding Universal Value (OUV). It further recommends that the focus for any future development should be in the northern part of the allocation Site i.e. away from the A44 and WHS and that this would need to be accompanied by an appropriate landscaping scheme to reduce visual intrusion. This approach would leave a rural buffer alongside this part of the WHS reducing perceptions of encroachment into its rural setting.

### **Land north of Hill Rise**

- 5.8 The CBA report identifies that the Site is of medium landscape sensitivity and medium-high visual sensitivity. It suggests that in landscape and visual terms a development of approximately 120 homes could be successfully accommodated on the site, ensuring that development is generally of low density. The report makes a series of recommendations as to how the impact of development could be minimised in landscape and visual terms.
- 5.9 With regard to heritage impact, the report identifies that development of the Site would not have a significant impact on the setting of the listed building at 118-124 Manor Road as it would be visually separated from the building and the building's setting is focused on the local streetscape away from the Site. In relation to scheduled monuments, the report identifies that the development of the Site could affect their wider rural setting but only to a limited degree.
- 5.10 The key heritage issue identified in relation to the Site relates to its potential impact on the rural character and nature of the setting of the WHS and Registered Park and Garden. The report identifies that although the Site is screened from the WHS and Registered Park and Garden the development of the Site still has the potential to alter the wider rural setting of the WHS. In this context the relationship of the allocation site to the River Glyme is noted,

the river being an important element of the WHS's setting in both functional and character terms.

- 5.11 The report identifies that development of the whole site to around 300 units would represent a notable encroachment into the rural setting of the WHS / Registered Park and Garden – a risk that is further exacerbated by potential cumulative / combined impacts associated with the two other allocation sites around Woodstock. However the report also notes that visual separation of the Site from the WHS reduces the risks associated with future development in terms of impact on the WHS and Registered Park and Garden. It identifies a number of measures in addition to landscape design mitigation measures that could be taken to reduce risks further and also help address potential cumulative/combined impacts.

### **Land north of Banbury Road**

- 5.12 The CBA report splits the site into 3 parcels, a western Parcel A, a central Parcel B and an eastern Parcel C. The report identifies that in overall landscape terms, the site is of medium landscape sensitivity, except in the south west corner where it is medium-high. Visual sensitivity is high overall.
- 5.13 It highlights the valuable contribution of the southwest part of the site (within Parcel A) and suggests that very careful consideration needs to be given to whether it is appropriate to develop this area and the extent/siting of any built form as well the character, form, density and design of new development.
- 5.14 The report identifies that from a landscape perspective, Parcels B and C are less sensitive with, subject to appropriate mitigation, a greater capacity to accommodate residential development. Parcel A is more sensitive with an overall lesser capacity to accommodate development, reflecting the more important role this parcel provides in the landscape setting of the town. Having regard to this, the report concludes from a landscape perspective that a development of approximately 220 homes could be successfully accommodated on the Site, ensuring that it is overall of low density. The report makes a series of recommendations as to how the impact of development could be minimised in landscape and visual terms.
- 5.15 In terms of heritage impact, the report raises a number of issues relating to the Woodstock Conservation Area, Blenheim Palace WHS and Registered Park and Garden, and listed buildings along Banbury Road.
- 5.16 All three parcels lie in the broad view cone identified in the WHS Management Plan. CBA conclude that standard height residential development on Parcels B and C is unlikely to affect the view cone in either direction. However, development on Parcel A has the potential to affect the general backdrop of views from the WHS, views to the WHS as well as affecting the backdrop to the conservation area. In this context Parcel A is considered to be a sensitive location in terms of development in the setting of the WHS, Park and Garden and conservation area. The report does not recommend that Parcel A is considered for built

development and that if it is proposed it would need to be pulled back from the hillslopes leading towards Woodstock and focussed on the flatter ground closer to Parcels B and C.

- 5.17 Parcel B forms a key component of the setting of a group of listed farm buildings on Banbury Road and the report identifies that development of the site could therefore significantly degrade the setting of the Grade II listed buildings, an issue that requires very careful consideration e.g. through the use of an appropriate landscape buffer. It suggests that if development does come forward in Parcel B, significant attention would need to be paid to the setting of 7 Banbury Road with a substantial landscape buffer recommended between the buildings and any future development. One possible option would be to confine development to the northern part of the development site utilising the historic field pattern to create a landscape division between the listed buildings and the development. In addition, to the landscape buffer, the report highlights that care would have to be taken with implementing a landscape design to integrate the development into the setting of the listed buildings and that access should be avoided from the south east as this would further affect the setting of the buildings. The report highlights that any harm would need to be balanced against potential public benefits of housing were development to proceed.
- 5.18 Parcel C is identified as the least sensitive of the three parcels in historic environment terms and the report recommends that development is focused on this parcel. Development here would not have a significant impact in relation to the conservation area or WHS. It would affect the setting of the listed complex of farm buildings at 21-23 Banbury Road but to a lesser degree than the development of Parcel B would affect the listed buildings at 7 Banbury Road. The report suggests that the impact would still need to be balanced against the public benefits of new housing.

### **Cumulative Impact**

- 5.19 As there are three proposed allocations at Woodstock the CBA report considers the issue of cumulative impact on the setting of the Blenheim Palace WHS and Registered Park and Garden. It states that the three Woodstock allocation sites could all affect the setting of the Blenheim Palace WHS and Registered Park and Garden to differing degrees but that together they pose a more significant issue in terms of their potential 'in-combination' impact on the wider rural setting of the WHS.
- 5.20 The report states that the development of the entire area of all three sites would constitute a significant change to the rural landscape setting of the WHS. The partial built development of the Sites, as identified in CBAs recommendations, would still result in a change in the rural setting but to a less significant degree. The report states that it is unclear where the tipping point would occur i.e. at what point combinations of development would begin to significantly erode the rural character of the WHS's setting and hence adversely affect its OUV.
- 5.21 In terms of cumulative impact the report identifies that in terms of 'in-combination' risks, the land east of Woodstock and Parcel A of the land north of Banbury Road site (without alteration or mitigation) are the least best performing allocation sites in relation to the

Blenheim Palace WHS. It should be noted however that the land east of Woodstock site would perform better if the area to the south and closest to the WHS was not subject to built development.

- 5.22 The Land north of Hill Rise is the next best performing, with Parcels B and C of the Land north of Banbury Road the best performing in relation to the WHS.

## 6. Potential Harm versus Benefits of Development

### Potential Harm

- 6.1 In relation to designated heritage assets such as the Blenheim Palace WHS, it is necessary to consider the likely degree of harm that a proposed development might have on the significance of that asset.

- 6.2 The NPPF states at paragraph 132 that:

***‘As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional’.***

- 6.3 It goes on to state at paragraph 133 that:

***‘Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:***

- ***the nature of the heritage asset prevents all reasonable uses of the site; and***
- ***no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and***
- ***conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and***
- ***the harm or loss is outweighed by the benefit of bringing the site back into use’.***

- 6.4 And at paragraph 134 that:

***‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use’.***

- 6.5 The CBA report commissioned by the Council identifies that all of the proposed allocations have the potential to cause some degree of harm to designated heritage assets including the WHS, both individually and cumulatively.

6.6 Key considerations therefore include the significance of the heritage assets affected, the degree of likely harm and the extent to which that harm can be mitigated. The table below summarises the potential harms identified by CBA and how they suggest those harms might be mitigated.

|                               | Identified Potential Harms  | Recommended mitigation   |
|-------------------------------|---|--|
| <b>Land east of Woodstock</b> | <p>No impact of note on the setting of the Woodstock Conservation Area or any of the listed buildings within the conservation area.</p> <p><b>Blenheim Villa Scheduled Monument</b> – whilst development could significantly change the open rural character of the monument’s setting this would have only a limited impact on the significance of the asset given the limited contribution the setting of the asset makes to its significance.</p> <p><b>Cowyard listed buildings</b> - the issue is predominantly one of potential visibility and visual encroachment into their rural / parkland setting.</p> | <p>None.</p> <p>None.</p> <p>Intervening vegetation should reduce the risk of significant visual intrusion, but it is recommended that Should development be promoted on the Site then significant additional planting should be included along the frontage with the A44 to minimise potential visual issues.</p> |

|  | Identified Potential Harms  | Recommended mitigation  |
|--|---|---|
|  | <p><b>Blenheim WHS and Registered Historic Park and Garden</b> - potential to notably alter the wider rural setting of the WHS and to affect the approach along the A44. At 17ha the Site is a substantial allocation and development of the Site in total would represent a significant encroachment into the rural setting of the WHS / Registered Park and Garden, assuming densities in the order of 30 units/ha total development would be c. 510 units. The proposed allocation of 300 homes would still result in a significant new development in the Site.</p> | <p>Recommend that the overall scale of the Site is reduced and/or a reduced capacity is allocated for the Site as this would reduce the loss of rural landscape and reduce potential impacts on the WHS and its Outstanding Universal Value (OUV). Also that the focus for any future development should be in the northern part of the allocation Site i.e. away from the A44 and WHS. This would need to be accompanied by an appropriate landscaping scheme to reduce visual intrusion. This approach would leave a rural buffer alongside this part of the WHS reducing perceptions of encroachment into its rural setting.</p> |
| <p><b>Land north of Hill Rise, Woodstock</b></p> | <p><b>118-124 Manor Road Grade 2 listed building –</b><br/>No significant impact on the setting of the listed building as it would be visually separated from the building and the building’s setting is focussed on the local streetscape away from the Site.</p> <p><b>Scheduled Monuments</b> - Development of the Site could affect their wider rural setting but only to a limited degree.</p>   | <p>None.</p> <p>None.</p>   |

|   | Identified Potential Harms   | Recommended mitigation  |
|---|--|---|
|   | <p><b>Blenheim WHS and Registered Historic Park and Garden</b> - the key issue in relation to the Site relates to its potential impact on the rural character and nature of the setting of the WHS and Registered Park and Garden. Although the Site is screened from the WHS and Registered Park and Garden the development of the Site still has the potential to alter the wider rural setting of the WHS. Development of the Site in total for around 300 units would represent a notable encroachment into the rural setting of the WHS / Registered Park and Garden.</p> | <p>Ensure development heights remain at or below 2 storeys to reduce visual presence and ensure that development does not emerge over the top of existing development to the west. Ensure that built development on the site is restricted in its geographical extent and scale to lessen the overall change to the rural character of the setting of the WHS. This could include:</p> <ul style="list-style-type: none"> <li>- keeping development back from the eastern boundaries of the allocation site and hence away from the upper sides of the river valley, which would also address other identified issues; and</li> <li>- ensuring that the northern part of the site where it joins the main road remains undeveloped to reduce perception of urbanisation.</li> </ul> |
| <p><b>Land north of Banbury Road, Woodstock</b></p> | <p>The Site raises a number of issues relating to the Woodstock Conservation Area, Blenheim Palace WHS and Registered Park and Garden, and the listed buildings along Banbury Road</p> <p><b>Woodstock Conservation Area</b> - development on Parcel A has the potential to affect the backdrop to the conservation area. Development of Parcel C would not have a significant impact in relation to the conservation area.</p>  | <p>It is not recommended that Parcel A is considered for built development. Should built development be proposed this would need to be pulled back from the hillslopes leading towards Woodstock and focussed on the flatter ground closer to Parcels B and C. Recommend that development is focused on Parcel C.</p>   |

|  | Identified Potential Harms   | Recommended mitigation   |
|--|--|--|
|  | <p><b>Blenheim WHS and Registered Historic Park and Garden</b> – All three parcels lie in the broad view cone identified in the WHS Management Plan. Standard height residential development on Parcels B and C is unlikely to affect the view cone in either direction. However, development on Parcel A has the potential to affect the general backdrop of views from the WHS and views to the WHS. Development of Parcel C would not have a significant impact in relation to the WHS.</p> <p><b>Banbury Road Grade II listed buildings (7 Banbury Road and 21 – 23 Banbury Road)</b> - Parcel B forms a key component of the setting of a group of listed farm buildings on Banbury Road and development could significantly degrade their setting. Development of Parcel C would affect the setting of the listed complex of farm buildings at 21-23 Banbury Road but to a lesser degree than the development of Parcel B would affect the listed buildings at 7 Banbury Road.</p> | <p>It is not recommended that Parcel A is considered for built development. Should built development be proposed this would need to be pulled back from the hillslopes leading towards Woodstock and focussed on the flatter ground closer to Parcels B and C. Recommend that development is focused on Parcel C.</p> <p>Parcel B - significant attention would need to be paid to the setting of 7 Banbury Road. A substantial landscape buffer is recommended between the buildings and any future development. Potentially confine development to the northern part of the site utilising the historic field pattern. Landscape design to integrate the development into the setting of the listed buildings. Ensure that access does not come from the southeast.</p> <p>Parcel C - Any development would need to respond to the setting of the listed building at 21-23 Banbury Road.</p> |

|                          | Identified Potential Harms  | Recommended mitigation  |
|--------------------------|---|---|
| <b>Cumulative impact</b> | <p><b>Blenheim WHS and Registered Historic Park and Garden</b> - The development of the entire area of all three sites would constitute a significant change to the rural landscape setting of the WHS. The partial built development of the Sites, as advocated in this document, would still result in a change in the rural setting but to a less significant degree. It is unclear however where the tipping point would occur i.e. at what point combinations of development would begin to significantly erode the rural character of the WHS's setting and hence adversely affect its OUV.</p> | <p>As outlined for each site above. No specific, additional mitigation measures recommended in relation to cumulative impact.</p> |

- 6.7 The Council acknowledges that having regard to the findings and recommendations of the CBA report, the proposed allocations at Woodstock as set out in the Local Plan proposed main modifications (November 2016) would be likely to cause a degree of harm to a number of designated heritage assets including the Blenheim Palace WHS and Registered Park and Garden.
- 6.8 To address these concerns (and also the landscape and visual considerations identified by CBA) the Council acknowledges that further changes to the three Woodstock allocation policies and their supporting text are required.
- 6.9 The Council has prepared a separate schedule of suggested further modifications which will be submitted to the Local Plan Inspector for his consideration in relation to the soundness of the Local Plan. These changes are intended to specifically address the findings and recommendations of the CBA report as well as the more general findings of the updated Sustainability Appraisal (SA) addendum report. Whilst the proposed changes won't completely eliminate any harm, the Council considers that they will help to reduce it to an acceptable degree when weighed against the public benefits.
- 6.10 The suggested further modifications are briefly summarised below.

***Land east of Woodstock***

- Number of homes to be reduced from around 300 units to around 270 units;
  - Additional emphasis placed on:
    - Landscape dominated design;
    - focusing development on the northern part of the site and pulling away from the A44 and WHS as far as possible; and
    - the importance of the southern boundary including substantial structural hedgerow and woodland planting to assist with visual screening
- 6.11 The Council considers that the proposed changes it has identified will help to address the individual heritage and landscape/visual constraints of the east Woodstock site identified by CBA, in particular the potential impact on the wider rural setting of the Blenheim WHS. The reduction in the number of homes to around 270 will help to address the issue of cumulative/in-combination impact by reducing the overall number of homes to be provided at Woodstock in the plan period to 2031 and pulling development away from the A44/Blenheim WHS.

### ***Land north of Hill Rise, Woodstock***

- Number of homes to be retained at around 120 units;
- Additional emphasis placed on:
  - Landscape dominated design;
  - Keeping development away from the eastern and northern parts of the site; and
  - Retention of key views

6.13 The Council considers that the proposed changes it has identified will help to address the individual heritage and landscape/visual constraints of the site identified by CBA, in particular the potential impact on the rural character and nature of the setting of the Blenheim WHS.

### ***Land north of Banbury Road, Woodstock***

- Number of homes reduced from around 250 units to around 180 units;
- Additional emphasis placed on:
  - Landscape dominated design;
  - Development to be focused on the eastern and central parts of the site with the western part of the site kept free from built development;
  - The setting of the listed buildings along Banbury Road; and
  - Retention of key views

6.14 The Council considers that the proposed changes it has identified will help to address the individual heritage and landscape/visual constraints of the site identified by CBA, in particular the potential impact on the backdrop of the Woodstock Conservation Area, the general backdrop of views to and from the WHS and the setting of the listed buildings along Banbury Road.

6.15 Reducing the number of homes to around 180 units (40 less than the 220 recommended by CBA) will help to ensure a significant buffer is provided to protect the setting of the listed buildings along the Banbury Road, help to further reduce the potential for cumulative/in-combination impact on the WHS and will also help to address concerns expressed by Oxfordshire County Council as highway authority in relation to the potential transport impact of the site (due to a lower number of vehicle movements).

### **Summary**

6.16 The preceding analysis demonstrates that the three Woodstock allocations as proposed in the November 2016 proposed main modifications would give rise to varying degrees of harm to a number of designated heritage assets including the Blenheim WHS. The Council acknowledges that further modifications to the Local Plan are required to address these potential harms.

6.17 In accordance with paragraph 132 of the NPPF, great weight must be given to the conservation of any heritage asset, especially the Blenheim WHS given its internationally

recognised importance. Accordingly, any harm that is likely to arise requires clear and convincing justification.

- 6.18 It is therefore necessary to consider the extent to which any public benefits of the proposals would outweigh the potential harms identified and provide clear and convincing justification for the levels of harm that would arise. The potential benefits of the proposed allocations at Woodstock are considered below.

## **Benefits of the Development**

### ***Delivery of New Housing***

- 6.19 Taking account of the Council's further suggested modifications, the three proposed allocations at Woodstock would deliver 570 new homes. Whilst this is a modest reduction from the original proposals published in November 2016 (670 homes) it would clearly still make a significant contribution towards meeting identified housing needs in West Oxfordshire.
- 6.20 As outlined in Section 4.0, since the start of the Local Plan period in 2011 there have been just 168 new homes completed at Woodstock with only 14 houses built in the three year period 2013/14 and 2015/16. In terms of affordable housing, just 52 affordable homes have been completed between 2011 and 2017 – an average of less than 9 per year.
- 6.21 Woodstock is one of the District's most sustainable settlements in terms of available services and facilities. Its location on the A44 means it is also well-placed to benefit from proposed strategic improvements to the A44 corridor being progressed by Oxfordshire County Council and other key partners.
- 6.22 The Council considers therefore that it is entirely appropriate to seek to deliver additional housing at Woodstock through the Local Plan. This will increase the number of new homes being built including new affordable homes to help meet identified needs and to capitalise on the accessibility and transport links enjoyed by the town and the sub-area more generally.

### ***Economic Benefits***

- 6.23 The Council's economic evidence highlights the importance of the Eynsham – Woodstock sub-area in terms of the local economy with the area particularly benefitting from its proximity to Oxford and the city region economy. New homes provided in this location will enable people to live close to the central part of the County which provides a significant proportion of available job opportunities. As outlined previously Woodstock has a number of key employment sites and there are others nearby elsewhere in and near the sub-area. New housing will help to support those employment sites by providing opportunities for existing employees to live in close proximity and/or potential new employees to move to the area and be close to their place of work.
- 6.24 New housing provided at Woodstock will also result in additional expenditure in the local area which will help to support existing shops and services. In short, more people living in

the area means the likelihood of more money being spent locally which will in turn be of benefit to the town economically. Woodstock is a vibrant and successful town but is largely dependent on tourism associated with visitors to Blenheim Palace.

- 6.25 Additional expenditure from a larger resident population will help to further support local shops and services. This in itself could indirectly assist with job creation if any of those shops or services were to expand or diversify for example.

### ***Land Ownership***

- 6.26 It is relevant to note that all three of the proposed allocations fall within the same land ownership – the Blenheim Palace Estate (BPE) who also own significant amounts of additional land in the local area. BPE is managed by the Vanbrugh Unit Trust.
- 6.27 This provides an excellent opportunity to ensure that the potential cumulative effects of the developments (e.g. impact on capacity of local infrastructure – education, health etc.) can be properly addressed through the provision of necessary improvements. For example, if the provision of necessary school or health capacity was dependent on the relocation of an existing site/facility, it is likely to be the case that the extensive landholdings of the BPE would help to facilitate this.
- 6.28 The Stage 3 – Matter 14 hearing statement submitted on behalf of BPE stated at paragraph 1.17 stated that: ‘Single landownership will enable a comprehensive, well-planned, and structured approach to delivery of truly sustainable development, addressing cumulative impacts in a more effective way. This aspect is particularly relevant with respect to infrastructure such as transport, education and health. BPE will be able to address strategic issues efficiently and implement a simple solution for all Woodstock sites, with the support of WODC and OCC, to the benefit of existing and future communities’.
- 6.29 Furthermore, given the landownership involved it is clearly in the interest of BPE to secure high-quality, appropriate forms of development without harming the WHS or its setting. As set out in their Matter 14 hearing statement, ‘BPE has an on-going, multi-generational legacy interest, combined with a strong desire to ensure the provision of high-quality development, which benefits the local community. BPE is highly experienced in delivering bespoke housing for sale and rent, in the local vernacular, that contributes positively to local character’. BPE has a strong development partnership with local housebuilder Pye Homes who have previously brought forward a number of schemes on Blenheim land.

### ***Estate Maintenance and Upkeep***

- 6.30 The Blenheim Palace Estate has identified a maintenance funding shortfall of £1.3 million per annum. In short, the income of the estate does not cover the capital costs of all the repairs identified as being necessary.
- 6.31 As set out in the BPE Matter 14 hearing statement, ‘Blenheim Palace is the only WHS in the UK unable that has not received material public or Heritage Lottery Funding for maintenance, repair, conservation and restoration due to it being in private ownership. The

Trustees continue to explore opportunities to create a sustainable financial endowment as a base from which to support the internationally important conservation obligations and requirements of the WHS'.

- 6.32 And furthermore that, 'to safeguard the financial basis supporting one of the country's most significant heritage assets, income from a variety of sources must be secured. The proceeds from development on BPE's land will significantly contribute to meeting the on-going needs, including maintenance and repairs, of the WHS. This will ensure its long-term viability and the retention of WHS status. It will allow Blenheim to continue as one of the most popular heritage assets in the UK outside London to the significant benefit of the public, as well as to Woodstock and surrounding areas, by directly and indirectly supporting the local economy. All of this will be achieved without any recourse to the public purse'.
- 6.33 It is notable that in responding to the application for 300 homes on the land east of Woodstock (16/01364/OUT) in June 2016, Historic England acknowledged the extensive maintenance shortfall that exists and concluded that the money raised by the proposed development would entail a significant public benefit which would outweigh what they regarded as a moderate to low harm in heritage terms.
- 6.34 There is nothing to suggest that money raised by the other two allocations should not also be seen as a significant public benefit provided an appropriate sum is secured towards the upkeep of the estate through an appropriate legal agreement.

### **Summary**

- 6.35 The CBA landscape and heritage advice has identified a number of potential harms to several designated heritage assets as a result of the three proposed Woodstock allocations individually and also having regard to potential cumulative/in-combination impacts. This has also been reflected in the updated Sustainability Appraisal (SA) of these three sites.
- 6.36 Whilst at no point does the CBA report suggest the proposals would result in substantial harm, it does highlight a number of important issues that require careful consideration in determining how to take these sites forward in the most appropriate manner.
- 6.37 The Council fully acknowledges the importance of giving great weight to the conservation of heritage assets with particular need to consider potential harm to the Blenheim Palace WHS/Registered Park and Garden as an asset of the highest order.
- 6.38 Subject to a number of further modifications to the Local Plan the Council considers that the potential harm caused by the three proposed allocations will be less than substantial and that any harm that will arise will be more than offset against the likely benefits of additional housing provision at Woodstock one of the District's most sustainable settlements.

## **7. Overall Conclusions and Next Steps**

- 7.1 The Council believes it is appropriate to continue to allocate the three sites proposed at Woodstock. Woodstock is a designated rural service centre with an excellent range of services and facilities and is also very well-located in respect of available transport links and job opportunities including those associated with the Oxford city-region economy. The Council's economic evidence identifies the Eynsham – Woodstock sub-area as being of particular importance and as such the provision of new housing in this area is considered to be appropriate.
- 7.2 A key issue is the potential impact of development on the important historic environment of the town which is a key draw for tourists and a major contributory factor to the vibrancy of the town. Of particular importance is the Blenheim Palace WHS/Registered Park and Garden which attracts over 800,000 visitors each year.
- 7.3 The Council fully acknowledges the great weight that must be given to the conservation of the WHS as well as the town's other designated heritage assets. The additional landscape/heritage evidence prepared by CBA has carefully considered the proposals put forward by the Council in November 2016 and has identified that they would result in varying degrees of harm to different heritage assets both individually and cumulatively.
- 7.4 They have however identified a number of measures which will address those identified harms including a reduction in scale/quantum of development on the land east of Woodstock and the land north of Banbury Road.
- 7.5 In light of the CBA report and recommendations the Council acknowledges that further modifications to the Local Plan are required.
- 7.6 Subject to those changes being made it is considered that any harm likely to be caused by the three proposed allocations at Woodstock both individually and cumulatively, will be less than substantial and more than offset by the public benefits that will accrue from the delivery of new homes in this sustainable, accessible location.
- 7.7 In terms of next steps, this topic paper will be published for consultation along with the CBA landscape/heritage advice, the updated Sustainability Appraisal (SA) addendum report and a separate topic paper on the Cotswolds AONB.
- 7.8 Responses received to these consultation documents will then be considered by the Inspector in setting out his views on the most appropriate way forward for the Local Plan.