

OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING CONSULTATION:

District: West Oxfordshire

Consultation: Woodstock Neighbourhood Plan 2031 – Submission Draft

This report sets out Oxfordshire County Council's view on the Draft Charlbury Neighbourhood Plan 2031

Annexes to the report contain officer advice.

Overall View of Oxfordshire County Council

Oxfordshire County Council (OCC) continues to support in principle the ambition of Woodstock Town Council to prepare a Neighbourhood Plan and welcomes the opportunity to comment on the Regulation 16 Submission Plan.

The Plan has a single focus on the protection of green spaces and identifies 11 proposed local green spaces for designation (Policy WNDP1). We welcome in principle the commitment to protecting local open spaces. As a single issue Plan, there are no housing allocations made, however it is noted that there are three non-strategic housing allocations in Woodstock made in the adopted West Oxfordshire Local Plan 2031 under policies EW3, EW4 and EW5 for a total of 600 homes.

OCC has previously responded to the Reg14 draft Plan in August of 2021 and we welcome that some of our comments have been addressed, including the removal of the Oxfordshire Museum as a draft Local Green Space and the amendment of Memorial Garden (LGS2) to remove OCC owned access. However, concerns remain about the proposed designation of Marlborough School Playing Field (LGS7). The proposed designation would unreasonably restrict the ability of the school from carrying out any additional development in future to support or complement the existing facilities, which is particularly important given the proximity of allocations EW3, EW4 and EW5. **Therefore, OCC as landowner request that LGS7 is deleted.**

Detailed officer comments from Property, Flood Risk and Public Health are set out in Annex 1 below.

Officer's Name: Helen Gosnell-Whyman

Officer's Title: Planner

Date: 12 May 2022

ANNEX 1
OFFICER ADVICE

District: West Oxfordshire

Consultation: Woodstock Neighbourhood Plan – Submission version

Officer's Name: Lyana Powlesland

Officer's Title: Senior Planner, Bluestone Planning for OCC Property

Date: 04 May 2022

Comments

Representations on behalf of OCC Property & Facilities

OCC previously provided comment on the draft Plan (Reg14) in August of last year and note the removal of the Oxfordshire Museum and Old Woodstock Play Area from the Local Green Space allocations.

LGS2: Memorial Garden – We welcome the amendment to remove the OCC owned access which is associated with the library.

LGS7: Marlborough School Playing Field – We note this remains unchanged within the submission draft. As previously commented, especially now with the allocation of the EW3 to the south and allocations EW4 & EW5 within the area, whilst the Marlborough School Playing Field doesn't lie within the Conservation area, NPPF, paragraph 101 makes clear that *“the designation of land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.”* Paragraph 101 continues to state that *“Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.”*

The NPPG goes further in stating: *“designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must be identified sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.”* (Paragraph: 007 Reference ID: 37-007-20140306)

By allocating this parcel of land as a LGS, the ability to provide limited development within it for the purposes of extended and new education facilities to accommodate the increase in housing provision, will no longer be available. This means that this site which is suitable located for these purposes, will no longer be able to assist in meeting the ongoing requirement to provide school facilities and other services of public interest, and land will need to be located elsewhere to meet this demand; likely within more sensitive areas and edges of the settlement.

We maintain that the allocation of LGS7 would not be consistent with the local planning for sustainable development. The West Oxfordshire Local Plan incorporates the objective of *“social progress which recognises the needs of everyone”* within their meaning of sustainable development. The proposed designation would unreasonably restrict the ability of the school from carrying out any additional development in future to support or complement the existing facilities.

There remains no justification on how the allocation of LGS7 would create benefit further than what already exists today without the allocation. Oxfordshire County Council are a responsible public landowner who is best-placed to determine how land held/owned for public benefit should be used in the future.

The facilities would already be protected as community facilities under Paragraph 93 of the NPPF and West Oxfordshire's Local Plan Policy TLC5 which states, *“development proposals*

should not result in the loss of existing recreational open space (including school playing fields, allotments and amenity areas) unless: the development is for buildings and/or facilities ancillary to, or enhancing, the amenity or recreational value of the open space; or there is clear evidence that now, and in the future, the land will no longer be needed for its current purpose or for recreational uses by the wider community.” Further, consent of the Secretary of State for Education is also required to dispose, or change the use of land used by schools, including playing field land.

It is therefore requested that LGS7 is deleted from the submission version of Woodstock's Neighbourhood Plan.

District: West Oxfordshire
Consultation: Woodstock Neighbourhood Plan – Submission version
Officer's Name: Chris Brown
Officer's Title: Principal Officer – Flood Risk Management
Date: 4th May 2022

Comments

There is little in the way of managing flood risk in Woodstock Neighbourhood Plan although it is noted that the focus is on open green spaces. There is a flood map that shows the extent of river flooding but there is no mention of managing the risk from surface water flooding. I suggest there should be greater mention of managing flood risk in the plan, please see below a link to OCC guidance on Neighbourhood Planning and Flood Risk [neighbourhood-planning.pdf \(oxfordshirefloodtoolkit.com\)](https://www.oxfordshirefloodtoolkit.com/neighbourhood-planning.pdf)

District: West Oxfordshire

Consultation: Woodstock Neighbourhood Plan – Submission version

Officer's Name: John Lee

Officer's Title: Health Improvement Practitioner

Date: 06/05/2022

Comments

The Oxfordshire County Council Public Health team previously made comments on the Woodstock Neighbourhood Plan in Summer 2021, highlighting our support for the Plan's commitment to protecting local green spaces, particularly those that include community facilities and those which enable local people to enhance their mental and physical health. It was also welcomed that the Neighbourhood Plan refers to policy EH4 in the Local Plan which recognises the importance that public realm and green infrastructure makes towards combating climate change.

We previously noted that despite the Plan's commitment to protecting open spaces, there was a lack of consideration for promoting active travel opportunities, particularly in relation to the Primary and Secondary Schools. This remains absent from the latest version of the Neighbourhood Plan and should be considered a priority.

Despite health facilities being listed among the definition of 'infrastructure' in the glossary, there is no specific mention to the access to GP services and healthcare within the main body of the Plan. With the Plan referencing an upcoming 30% increase in the housing stock across Woodstock, any new development should contribute to the infrastructure costs of providing primary care to new residents given that local GP surgeries are already operating at capacity.

It is welcomed that Watermeadows are to be designated for protection as a Local Green Space in Policy WNDP1 of the Plan as the main floodplain of the local area and with new development earmarked for Woodstock.

It is mentioned that the Woodstock Community and Infrastructure Delivery Plan includes biodiversity, wildlife habitats and green spaces on the Priority List relating to Section 106 developer contributions. We feel strongly that developers should be obliged to contribute to and/or mitigate any loss of green space.

Finally, we note that the previous version of the Neighbourhood Plan referred to the economic costs and gains from a community's access to (or lack of) green spaces. We reiterate that it would be important to explicitly state within the Plan that the economic value of green spaces is intrinsically linked with social and wellbeing benefits.