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12th July 2025

Objection to Planning Application 25/01346/OUT

From: Kidlington Development Watch (KDW)

Kidlington Development Watch (KDW) was established in 2014 because of concerns about proposals for excessive development and their damaging consequences in and around Kidlington. It aims to provide information to residents about planning proposals affecting Kidlington and has been a very active participant in the Local Plan Process. It has a mailing list of over 600 people and can reasonably claim to represent the views of a large number of residents.

Contact details: Name and address supplied in covering e-mail.

Kidlington Development Watch OBJECTS to this application for the following reasons:

1) The site is within archetypal Green Belt and the proposed development would cause serious harm to the Green Belt.

It is agricultural land divided by hedgerows into small fields, leading to further fields, the Cherwell floodplain meadows, the Community Woodland, the River Cherwell and further countryside beyond. There is not a building in sight before the small villages of Hampton Poyle and Thrupp. Nor are there any roads or other structures.

The Government states that it “*attaches great importance to Green Belts*” and that “*the essential characteristics of Green Belts are their openness and their permanence*”. This land exhibits those characteristics perfectly as it has never been developed and has always been open countryside without man-made intrusions.

Any development here would therefore cause the most serious harm to the Green Belt and its openness.

2) The land strongly supports Green Belt purpose (a): preventing the sprawl of large built-up areas and cannot be considered to be Grey Belt.

The recent report for Cherwell District Council : “Opinion on Green Belt contribution of land in the Kidlington Gap” (LUC, June 2025) states that “*Kidlington should be considered a town in the context of assessing the function of land in containing the spread of urban development*” (para 3.9). It also concludes that “*there is a strong case for treating Kidlington, either alone or in combination with Yarnton, as a large built-up area*” (para 3.2).

As the Land Behind the Moors is immediately adjacent to the northern boundary of Kidlington, the site therefore strongly supports Green Belt purpose (a): preventing the sprawl of large built-up areas and cannot be considered to be Grey Belt.

Regardless of Kidlington's status in its own right, there is also a strong case for concluding that the site is located at the true boundary of the built up area of Greater Oxford. This is because the substantial release of Green Belt land between Oxford and Kidlington in the Local Plan Partial Review has resulted in the remaining gap between Oxford and Kidlington now being very small. Indeed it is so small that it is similar to gaps which appear within urban areas, including uses such as playing fields.

Again, this means that the site strongly supports purpose (a) and cannot be considered to be Grey Belt.

Please see the supplementary document from KDW that discusses this in more detail.

3) The site is prone to flooding and the mitigation measures proposed appear insufficient. A more thorough Flood Risk Assessment is required.

The east end of the site is regularly under water in winter as it lies only one metre above the normal level of the River Cherwell. We understand that this is caused by groundwater (water table) flooding though this does not seem to be recognised in the consultants' reports. There is also regular flooding elsewhere on the land. The development would also create significant runoff and it appears that only a portion of this would be dealt with through the existing piped drainage system in Kidlington. We are concerned that the drainage ponds and swales proposed on site to deal with the rainwater draining from the proposed development would not be able to cope, resulting in periodic flooding to neighbouring properties. This is a problem which will only get worse as more extreme rainfall is expected as the climate continues to change.

We consider that a more thorough Flood Risk Assessment requiring on-site monitoring and monitoring is necessary to reveal the size of the problem and the extent of mitigation measures required.

We also draw attention to the Objection to the application from Oxfordshire County Council as Lead Local Flood Authority which states that "*Winter ground water monitoring records showing peak ground water levels should be submitted*".

4) The site is important for nature conservation and development would be harmful.

The five fields which are included in the site are themselves relatively small and bounded by hedges and trees which support a variety of wildlife, particularly birds. Beyond further small fields, meadows and woodland run along the River Cherwell and are designated as a Conservation Target Area (CTA). The site is also close to the St Mary's Fields Nature Reserve.

Clearly any development on the proposed site would bring urban uses closer to these nature conservation areas and would be damaging to nature.

The site is within the 'Recovery Zone' of Oxfordshire's Nature Recovery Network. (See: <https://www.wildoxfordshire.org.uk/oxfordshires-nature/oxfordshires-nature-recovery-network>).

The potential harmful impact of the development on nature conservation is well stated by BBOWT in its comments:

"The proposed development would extend Kidlington further towards the CTA and directly into the NRN Recovery Zone. We consider this extension to Kidlington presents a considerable risk to the wildlife of the CTA, the river valley, and the protected sites, through increased recreational impact, hydrological impact, air pollution, and ecological isolation, and from the impacts of urbanisation on species that are not adapted to tolerate such urbanisation"

We also ask that BBOWT's concerns about protected species, in particular Bats and Great Crested Newts, are fully taken into account.

5) The land is important for people's health and well-being.

This land provides one of the last remaining areas of unspoilt tranquil and open countryside on the doorstep of Kidlington. As such, it is hugely valued by its residents. There are two public rights of way that cross or run along the edge of the site. These are much used by local residents (and others) for recreation and relaxation. There are also many informal paths around most of the field boundaries which have also been extensively used for many years. The importance of access to peaceful open space for people's physical and mental health is widely recognised.

6) This speculative development is not needed as 5,000 houses are already planned for the Kidlington area and most will be available for Kidlington residents.

4,400 houses were allocated on Green Belt land around Kidlington as recently as 2021. None have yet been built, but planning applications are well advanced and the eventual total is likely to be more than 5,000. This is almost as many houses again as currently exist in Kidlington. Most of these homes will be available for people from Kidlington. It is absurd to suggest that somehow these don't count towards local need because they do not fall within the historic boundaries of Kidlington parish.

The market housing element of the 4,400+ will be available for anyone while the affordable housing element will be available for key workers and people 'with a connection to Oxford'. This includes working or having family connections with the City, which would clearly apply to many people currently living in Kidlington parish.

We are aware that Cherwell has a temporary shortfall in housing land supply brought about by the abrupt 60% increase in Government “targets” since the introduction of the revised NPPF. However, the Council’s new Local Plan is at an advanced stage of preparation and complies with the Government’s rules for setting housing requirements, without the need to allocate this site. The temporary shortfall in land supply does not outweigh the serious harm that would result to the Green Belt from this development and the other objections we describe.

7) Development of this site, which is not allocated in the Local Plan, would add to pressures on transport infrastructure in the wider area. These will be stretched to the limit, and possibly beyond it, by already planned developments.

The 4,400+ houses, and other development that is included in the Cherwell Local Plan Partial Review (adopted September 2020) will have a major impact on the transport network which is already often at or above capacity. Congestion adversely affects both individual residents and businesses. The improvements included as part of the Local Plan do not provide major increases in capacity and are over-dependent on a modal shift towards public transport and active travel.

The County Council notes that the committed developments from the Local Plan Partial Review have not been factored in to the assessment of Traffic Impact for this proposal. This is clearly a major omission and one of the reasons that it objects to the application.

The County Council response also lists a series of further deficiencies in relation to transport impact.

This further, unplanned for and speculative, development behind the Moors would only exacerbate pressures on the transport network without making any contribution to addressing them. It would not meet the Government’s “Golden Rules” for development in the Green Belt in respect of infrastructure provision (also see the following item).

8) Water supply and sewerage networks do not have sufficient capacity.

Water Supply. We note that in its comments “*Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal.*” They further state that “*The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development*”. This is clearly of great concern to local residents. Thames Water therefore require a “no occupancy” (Grampian) condition. We consider that permission should not be granted at all in these circumstances.

Sewerage. Until recently the Environment Agency (EA) has challenged planning applications for new housing over concerns about sewage treatment capacity which poses a risk to water quality if developments had gone ahead as planned. Earlier this year the EA accepted a plan

put forward by Thames Water to provide the necessary capacity. In this plan, absolutely essential upgrades to Thames Water's sewage processing capacity will only be complete by 2031, with an interim solution by 2027 allowing planned developments to go ahead.

This recent agreement seems hastily put together and ambitious in itself. Thames Water's financial position is acknowledged to be precarious, however, and it is therefore difficult to accept that its plan is credible. Moreover, the plan only addresses developments committed in existing Local Plans. It does not address further unplanned development such as proposed in this application. To us, it would be irresponsible to approve this speculative application in the knowledge that Thames Water's plans only cater at best for already planned development – and there is considerable doubt over its ability to deliver on those.

9) There would be a substantial adverse impact on the Local Road Network.

It is proposed that the development will have two road accesses onto the Moors. The Moors is a relatively narrow residential road. It has already experienced traffic and speed problems as can be seen by the traffic calming measures (road humps) that are in place.

One of the accesses will be opposite Benmead Road which would undoubtedly experience an increase in traffic. Benmead Road itself has awkward bends near the entrance to Kidlington North Primary school which would become less safe. Traffic would also increase on High Street and Mill Lane both of which are local residential roads.

All of the sites already allocated as part of Cherwell's plan for 4,400+ homes have access directly onto major roads such as the A44, or the Banbury/Oxford and Bicester Roads. It is unacceptable to us that the proposed development only has access onto and via minor residential roads which already experience traffic problems.

10) The application appears to understate vehicle trip generation significantly

The Design and Access Statement states (p61) that *"The proposed development is anticipated to generate approximately 90 and 110 additional vehicle trips in the weekday morning and evening peaks"*.

However, TRICS data published in the document TRICS Residential Sub-Category Comparative Analysis (TRICS Consortium Limited, August 2022) indicates that the development would generate around 130 vehicle trips in each peak hour.

Similarly for the 12-hour period 07:00 to 19:00 the applicant estimates total vehicle trips to be 846. (Transport Assessment, Table 5.3, page 38). However using the TRICS data quoted above total vehicle trips would be 1115 (32% higher).

We have not located data for existing flows on the Moors but it is clear that the trips generated would add significantly to traffic flows on a relatively narrow road already experiencing traffic problems.

We are unable to check all of the figures and modelling in the application but find it very concerning that vehicle trips generated appear to have been understated.

Please see the supplementary document from KDW that provides more detail on trip generation, including source data.

11) The site should be designated as a Local Green Space (LGS), a proposal which we have consistently put forward since November 2021.

This is a positive proposal that KDW has made regularly to Cherwell Council since 2021 in response to its Local Plan consultations. These have had the full support of Kidlington Parish Council and build on its own proposal for a “Green Ring” around Kidlington. There were a large number of responses from the public in support of our proposals. Cherwell Council supported the “Green Ring” concept in an early stage of consultation and has assessed our Local Green Space proposal but has not, as yet, adopted it.

Our detailed justification, based on the Government’s criteria, for designating the land as a Local Green Space is appended. We are aware that designation does **not** allow any additional access to the land although it does protect it from development. We would also hope that, in time, a more environmentally friendly management regime could be agreed with the owner allowing for wider field margins and some more tree and shrub planting.

We are also aware that the landowner has made a CA16 deposition which prevents the land being designated as a Village Green. However, this does not prevent designation as a Local Green Space, and we continue to press for this in our response to Local Plan consultations.

Kidlington Development Watch
July 2025

(See Appendix on next page)

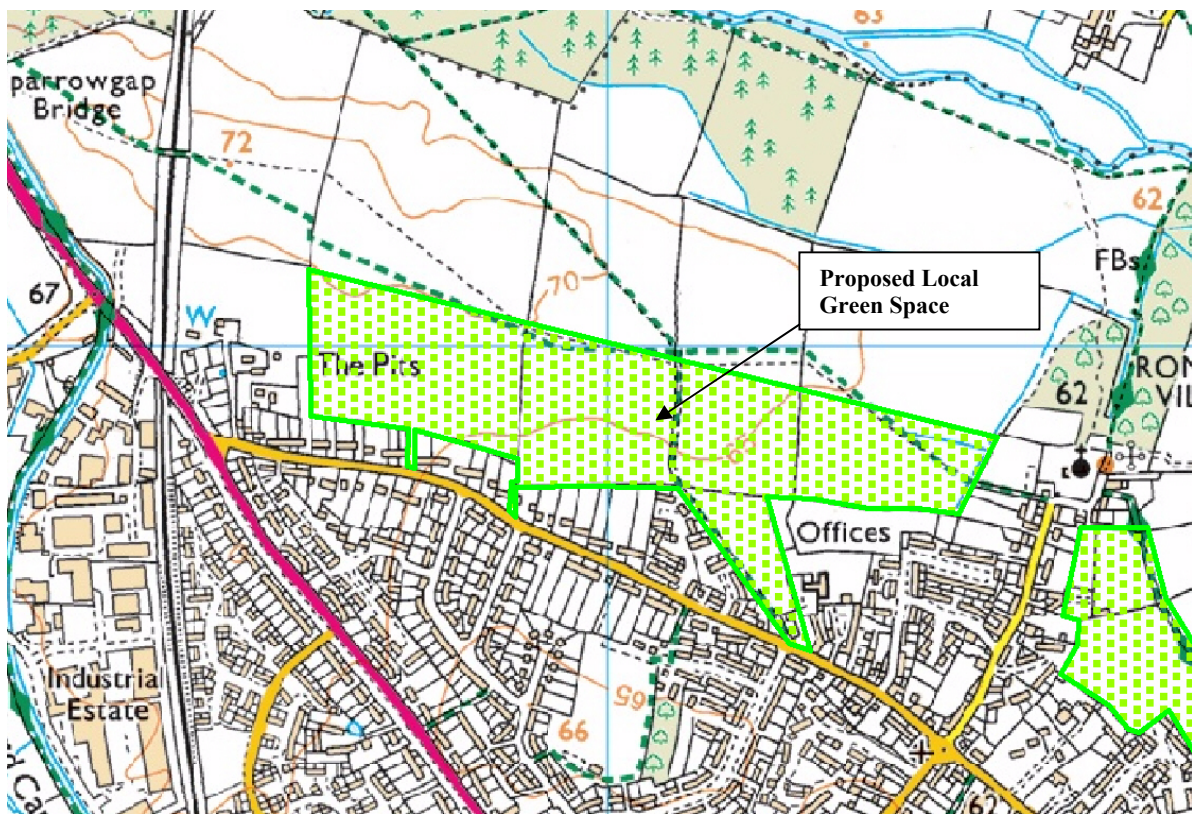
Appendix:

Extract from Kidlington Development Watch consultation responses to Local Plan Consultations:
Options Stage : November 2021
Regulation 18 : October 2023
Regulation 19 : February 2025

Proposed Local Green Space at Bury Moor Fields

Note: Bury Moor Fields refers to almost the same land which is the subject of the current Planning Application (Land North of the Moors)

The site is shown on the map below.



(Note that after crossing the easternmost field as shown, the E-W footpath, in practice, follows the boundary of the proposed LGS rather than the green dashed lines indicated on the map)

NPPF Criteria. The proposed LGS meets the NPPF criteria for designation, as follows:

Proximity to the local community

The area consists of five fields immediately adjacent to the built up area of Kidlington. There are several well-used access points from the nearby roads and two public rights of way cross and run along the proposed area. In addition, every field boundary has informal paths along it, demonstrating how extensively the area is used by the local community.

Historic significance

Kidlington is unusual in that its parish church is situated on the extremity of the village, on a slightly elevated site at the end of an area of terraced river gravels which runs along Church Street. St Mary's Church is Grade 1 listed, dates back 800 years and has an exceptionally tall and slender steeple

(Appendix, continued)

(known as 'Our Lady's Needle'). It is the final building on the northern edge of the village and is almost surrounded by fields, with the exception of houses at the northern end of Church Street. As the surrounding land is low-lying, the church is visible from considerable distances. When seen from many directions it appears to be set amongst fields.

The west-east centre line of the proposed LGS aligns with the church as can be seen from the photograph below.



The setting of this important historic building would clearly be damaged by development in these fields.

Kidlington Historical Society comments that : *“the landscape is a good example of post-enclosure Kidlington, with most of the field boundaries those set out on the Enclosure Map. The age of the hedges will be an indication of their value for wildlife. There is an ancient (possibly Roman) well just north of the area, in Ashpit. It's an odd place to find a well, right on top of the cornbrash ridge running down to the Church, so there may be archaeology around it, extending into the proposed LGS. This area is part of the setting of St Mary's with delightful views down the ridge towards the church from the footpath to Sparrowgap Bridge. The LGS would preserve these for future generations.”*

Recreational value

The site is crossed and bounded by two popular footpaths which are very well used by local people and visiting walkers. These are both enclosure awards from 1818 and should be maintained to a width of ten feet, though in practice they are not. The east-west path leads from the church towards the canal bridge near the Jolly Boatman public house next to the Banbury Road. The SE-NW path leads from the Moors to the Community Woodland and Canal Basin at Thrupp. A key attraction of these paths is that they cross open countryside and have fine views east to St Mary's Church.

(Appendix, continued)

In addition to this, almost every field boundary, including along the rear boundaries of houses on the Moors, is lined by informal paths which are regularly used for recreation by large numbers of local people.

Beauty, Tranquility and Richness of Wildlife

The site is in attractive open countryside (see photo above) which leads to the Cherwell Meadows Conservation Target Area and the River Cherwell itself. There are almost no buildings until the nearest villages are reached and no through roads. Consequently the area is tranquil and has the feel of being part of the countryside. This is not the case almost anywhere else on the village boundary.

The fields are relatively small and bounded by hedges and trees which therefore support a variety of wildlife, particularly birds and including rare wildlife species such as Short Eared Owls (on the RSPB amber list), and Skylarks (on the RSPB red list). Other bird species noted by local residents include goldfinch, greenfinch, redstart, jay, spotted woodpecker, green woodpecker, tree creeper, dunnock, cuckoos and various birds of prey and owls. Foxes and Deer are also frequently seen in the area and smaller animals include weasels, field mice, adders and grass snakes. At the point where the SE-NW footpath joins the Moors there is a small pond surrounded by scrub which, although now rather neglected, was maintained for many years for nature conservation and would benefit from restoration. Great Crested Newts have been found here in the past.

The site is close to the Cherwell Valley Conservation Target Area and to the St Mary's Fields Local Nature Reserve. It can therefore also be considered to be a protective buffer and corridor to these important habitats.

Local in Character

Guidance says that the site should not be extensive in nature but does not define extensive. In our view the proposed site is not extensive, certainly when compared to the areas of land that have already been removed from the Green Belt or from sites that are being put forward for development at the moment. We are aware of examples elsewhere of larger sites which local authorities have deemed suitable as LGS (see for example Bulmershe and Fox Hill sites in Wokingham's 2020 Local Green Space Topic Paper). While it extends over several fields, the width of the proposed LGS is limited to that of one modest field, and all of it meets the criteria set out above.