

OBJECTIONS to Planning Application - 25/01346/OUT

1) THE 'LAND BEHIND THE MOORS' IS DESIGNATED AS GREEN BELT.

The 'Land Behind the Moors' is the local name for this site which lies just to the north of Kidlington. It is currently arable land and provides a natural boundary between the urban edge of the village and the countryside beyond, consisting of the River Cherwell, floodplain meadows, the Thrupp Community Woodland and St Mary's Church and Nature Reserve known locally as 'St Mary's Fields'. The land has never been developed and has always consisted of open fields as far back as any known history of the area can be traced. Paragraph 142 of the National Planning Policy Framework states that:

'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'

On this basis alone, in principle, this application should be firmly opposed.

The Land Behind the Moors, Green Belt site, views to St Mary's Church from the public footpath, spring 2025.



2) THE SITE WAS NOT INCLUDED ON THE CHERWELL 2042 LOCAL PLAN (which is currently at Regulation 19 stage).

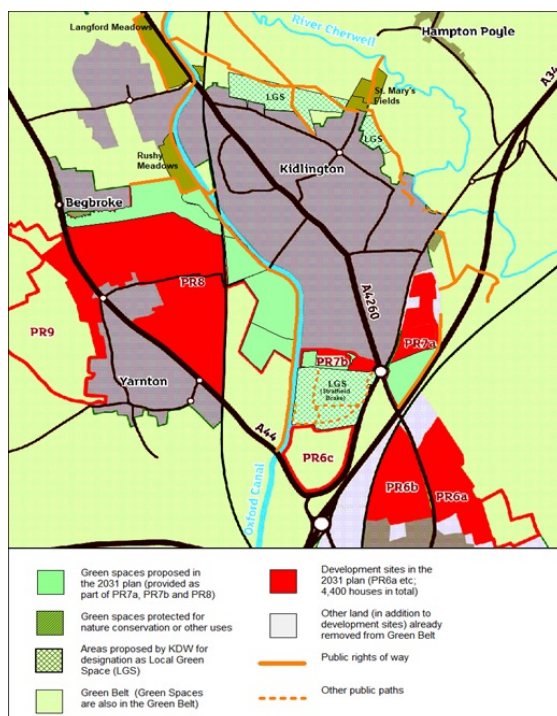
Cherwell District Council have stated in an email of 4th June 2025 to the 'Land Behind the Moors' campaign that the principal reason against inclusion was that "the land is within the Oxford Green Belt. For the Local Plan to release land for development from the Green Belt it has to demonstrate exceptional circumstances for doing so. In the Council's opinion, no such exceptional circumstances could be demonstrated."

It is the case that, for a planning application outside of the Local Plan, 'very special circumstances' must be demonstrated for a site to be released from the Green Belt; no such circumstances currently pertain.

In a document sent to CDC Planning on 27th April 2022 (obtained via a Freedom of Information request), the developer stated that *"the pre-application submission (July 2021) should be taken as a key baseline document, setting out the case for selecting The Moors as an allocation for up to 300 houses... including cricket pitches... as part of the Stratfield Brake relocation NECESSITATED BY Oxford United's new stadium"*.

This makes it clear that the origin of the proposed development was not based on housing need. Since the stadium proposal later moved to 'The Triangle' the relocation was not 'necessary' and neither was the sacrifice of Green Belt for the accompanying housing estate (should this argument have been adequate to prove 'exceptional circumstances' in the first place).

Kidlington Development Watch Map of Development Sites and proposed Local Green Spaces, January 2025.



3) THE SITE IS IMPORTANT FOR NATURE CONSERVATION.

The fields contain an abundance of wildlife, with well-established hedgerows on every boundary. Deer, badgers, and foxes are the large mammals evident on the site; many other species such as stoat, field mice, bats, slow worm, grass snake and adder are also present. Otters have been spotted on the River Cherwell. 47 bird species have been recorded on the adjacent St Mary's Nature Reserve since 2015, including 12 red-listed birds (cuckoo, marsh tit, fieldfare, redwing, song thrush, mistle thrush, spotted fly catcher, grey wagtail, greenfinch, lesser redpoll, house sparrow and starling). All of this wildlife should be protected from the effects of human habitation and the 'Land Behind the Moors' fulfils this role as an undeveloped Green Belt site, providing a boundary between the edge of Kidlington's urban sprawl and the countryside beyond.

The CDC Consultant Ecologist (whose document can be viewed under Consultee Responses) presently objects to the application since it has used an outdated metric to assess Biodiversity Net Gain, and because much of the required paperwork is missing, including ongoing breeding surveys of birds and bats. The applicant has identified 'broadleaved woodland' on the site as 'mixed scrub' and has left out a 'pond' which should have been included in the assessment. Due diligence has not been carried out and the impact on nature has potentially been undervalued.

BBOWT have responded as a Statutory Consultee as follows:

"The Cherwell Conservation Target Area document map and layers we have access to indicate that the development appears to be adjacent to the Lower Cherwell CTA at the north- eastern corner of the proposed development site. See this document which includes a map produced by TVERC detailing the CTA boundaries: Microsoft Word - Lower Cherwell Valley CTA.doc. Additionally, most of northern boundary is within 250m of the CTA.

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.

In our view, a report that identifies the impact on the CTA should be required with the planning application. This should include an assessment of the harm caused to the water ways of the CTA from site runoff during and post construction. This report should be taken into consideration when decision making is undertaken. We also suggest that a significant buffer should be implemented into the design of the development to ensure that there are reduced negative impacts on the adjacent and nearby habitats in this CTA. "

Further, they have concerns regarding pollution to the River Cherwell through runoff and changes to soil nutrients and ph. Planning should consider if it is really worth the

risk of damaging this most beautiful area of Kidlington which allows the whole community to access and experience nature, and allows the ecology to be preserved as best as is possible given that it is already close to an urban environment.

The 'Land Behind the Moors', view from PROW 265/15/10 looking towards the church, early summer evening 2025



The field just beyond the 'Land Behind the Moors', illustrating the open countryside which must be protected, early summer evening 2025



4) **THE OPEN NATURE OF THE LAND IS IMPORTANT TO THE HISTORY OF KIDLINGTON** in conjunction with the public footpaths across the site and the location of St Mary's 12th-15th century Grade One Listed church.

The open land, the church, and the footpaths can clearly be seen on a number of maps, for example a map of 'The Parish of Kidlington and Township of Thrup' dating from 'the 50th year of his present Majesty King George 3rd' (possibly 1809). Therefore, the footpaths across the open fields and the views to the church have been enjoyed for generations and are important to the identity of Kidlington.

PROWs 265/15/10 and 265/17/10 traverse the site; the proposed development would significantly disrupt these. 265/15/10 leads from The Moors up to join another path which leads out into the open fields beyond. It gives direct access to the river valley and the nature reserve and offers views to the church along the way.

Following the development, this path would first run alongside a road and then be flanked by housing on both sides. The developer suggests that the view of the church would be 'enhanced' by 'channelled vistas of built form' ie by being viewed via the streets of the housing estate. How can such a statement be taken seriously against the weight of history preceding it and the loss of these beautiful open views? PROW 265/17/10, which leads west from the church, would be moved to accommodate the cricket pitches. The experience of the paths within the open space and in relation to the church would be lost forever.

These paths are used constantly on a daily basis by local residents and visitors. It would be an immeasurable loss to have these paths effectively destroyed. For the developer to argue that 'rights of way' would still be in place and that the public have no 'right' to the open countryside and the views is mean-spirited and entirely misses the point that people walk these paths to experience nature and the countryside.

Map circa 1809 showing footpaths, open fields and church



5) THE SETTING OF KIDLINGTON'S MAIN HERITAGE ASSET, ST MARY'S CHURCH, WOULD BE IMPACTED.

The historic background outlined in the previous Objection Point (4) illustrates the impact this development would have on Kidlington's precious Grade 1 listed heritage asset, St Mary's Church. A Grade 1 listed building and its setting is deemed to be of national significance - other examples include Hampton Court and York Minster. Only 2.5% of listed buildings are Grade 1.

Claims are made in the 'Settings' support documentation (supplied by Bloombridge from Cotswold Archaeology) such as: "the development of the site would not harm the heritage significance of the Church or the Conservation Area and would comply with local policy". This seems questionable at best. At the very least, the views towards, and the vista from, the church would be utterly changed. The church would now be viewed via "channelled vistas of built form" to use Bloombridge's own phrase, instead of from open countryside. The vista looking out from the church graveyard would take in a large cricket pavilion and a housing estate just beyond the cricket pitches, where once had been empty fields, hedgerows and the public footpath. The connection back through time to a history enjoyed by previous generations would be completely lost.

Historic England have responded as a Statutory Consultee as follows:

“Historic England’s primary concern with the application is the impact the scheme would have on the setting of Church Street Conservation Area and the Grade I listed St Mary the Virgin Church. The Church Street Conservation Area covers the historic medieval core of Kidlington, which St Mary the Virgin Church is the focal point of.

Whilst modern housing has sprung up to the southern half, the northern half of the conservation area remains largely, as it has been historically, rural in nature. As set out in the Church Street Conservation Area Appraisal, “routes converge from all directions at the Parish Church... The slender spire of St Mary’s Church is a magnificent focal point from all directions”.

Kidlington was a distinctively rural agricultural settlement, and the close connection of core of the village with the surrounding landscape farmed from it is essential to understanding the history of the Conservation Area. Furthermore, the rural context also greatly enhances the aesthetic appeal of what is a very attractive group of buildings, which the church spire being the landmark feature from within the village and the rural hinterland alike.”

Further, ***“the development of this site would introduce a suburban built form within the current agricultural and rural landscape, reducing the sense of rurality around these designated heritage assets.”***

Historic England rate the harm caused by the development as ‘MEDIUM’, versus the Bloombridge’s assessment that there would be NO harm to the setting. The developer’s self-interested assessment of the setting should therefore

be disregarded. On behalf of the community, Cherwell District Council should take into account that this is Kidlington's *only* heritage asset and that medieval churches set within their original open landscapes are vanishingly rare. On the page shown below from the 'Design and Access' Statement, Bloombridge refer to the spire as a 'special feature of the site' and has designed the layout precisely to 'enhance' this. It is unacceptable that this setting would be destroyed for commercial gain, a benefit which the developer is clearly aware accrues to this site precisely *because of* its setting.

View of St Mary's Church from PROW 265/15/10



Page from Bloombridge's Design and Access statement making a feature of the view to the church:

7.5 Framing Views to the Church Spire

The orientation and design of pedestrian and vehicular routes has been carefully designed to frame views to the historic spire of St Mary's Church.

These framed views make more of this special feature of the site, enhancing the current aspects through channelled vistas between built form, along route ways and between proposed planting, employing the same themes that so successfully frame views of the steeple within the old part of the village.

These views provide the site with a unique character, with the spire acting as a waymark in the landscape. Trees and other elements have been positioned to benefit these views.

The nearest new house will be about 450m from the Church, creating a very significant new open space in the foreground and an entirely new way in which to experience the spire.



6) THE OPEN NATURE OF THE LAND SUPPORTS A 'NETWORK OF WELLBEING'.

This land on the edge of Kidlington is the last remaining unspoilt area bordering the Cherwell River valley and the countryside beyond. It is highly valued by the community as it provides access to open space and nature, and is therefore very significant for the mental and physical health of the local population.

As described in Point 4, there are two public rights of way that cross or run along the edge of the site. These are in constant use by local residents and visitors to Kidlington for leisure and recreation. Beyond the site, the PROWs link urban Kidlington to St Mary's Church and Nature Reserve, the Cherwell River valley, further field walks, and the Thrupp community woodland. Placing a housing estate at the location proposed would destroy the 'nature corridor' which runs from The Moors and out into the countryside beyond. Local businesses such as Annie's Tea Room and The Jolly Boatman have become a destination for walkers from Kidlington and a stopping off point for ramblers heading across country, perhaps to visit St Mary's Church or the canal. These businesses depend heavily on traffic from walkers/ramblers who pass through the 'Land Behind the Moors' en route, just as the wellbeing of the community depends on having these destinations, in conjunction with the open countryside, to enjoy.

The importance to people's mental health, in particular, should not be underestimated. As the region surrounding Kidlington becomes more developed it is fundamental for people to have an 'escape' route to enjoy the benefits that nature and open space can offer. When the 4,000-5,000 new houses (which have already been agreed) arrive in this area, this last bit of open space on 'The Land Behind the Moors' will be all the more precious. There are many who walk the area, some on a daily basis, to find solace or to survive depression or stress. Unfortunately, the life-saving and life-giving nature of the space is mostly a private and personal experience, so cannot be captured in a professional report.

Walkers on the public footpath near the church, late summer 2024



7) THERE ARE ALREADY UP TO 5,000 HOUSES (and other developments) COMING TO THE KIDLINGTON AREA.

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. Most of these will be available to people from Kidlington so it cannot be argued that LBTM must be taken to fulfil housing 'need', especially since the origin of this proposal is opportunistic (as outlined in Point 2), being related to the redistribution of sport in Kidlington, The final draft of the Local Plan (Regulation 19) allowed for housing figures to be met in accordance with policy at the time and this site was therefore removed as an unnecessary sacrifice of yet more Green Belt for only 300 units which could be easily redistributed elsewhere.

LOCAL INFRASTRUCTURE will already be stretched to, and possibly beyond, the limit by the planned developments. There will be a major impact on a transport network which currently often operates at or over capacity. Congestion adversely affects both individual residents and businesses. The improvements included as part of Local Plan do not provide for major increases in capacity; rather there is an unrealistic tendency to shift this additional load to public transport, cycling and walking. This further, unplanned for and speculative, development behind the Moors will only exacerbate pressures on the transport network without making any contribution to addressing them. This is not to mention the added pressure on schools, surgeries, dentists, and other local facilities already at breaking point.

It is noted that Thames Valley Police have multiple 'fundamental' concerns and objections regarding this development in its current form (as per their consultation document). It is therefore likely that crime risk will increase within the local community. There has already been a notable increase in drug-dealing, burglaries, joy-riding/drag-racing and the like in north Kidlington in very recent years, which the police force are already struggling to manage.

Artist's impression of housing on LBTM from the Design and Access Statement



8) THERE IS CONCERN THAT FLOODING WILL BE EXACERBATED.

The east end of the site (close to the church and where cricket would be located) is regularly under water in winter as it lies only one metre above the normal level of the River Cherwell. Kidlington Development Watch have learned that this is caused by groundwater (water table) flooding though this does not seem to be recognised in the consultants' reports. The photographs below show the 'cricket pitch' as a lake of substantial depth and size in autumn/winter. There is also regular flooding elsewhere on the land which is commensurate with heavy rainfall in the winter months. The development would create significant runoff and there is concern that the attenuation ponds and swales proposed on site to deal with the rainwater draining from the housing estate and cricket pitches would not be able to cope, resulting in periodic flooding to neighbouring properties. This is a problem which will only get worse with more frequent rainfall as the climate continues to change; the Met Office has just produced a new report saying that wetter winters are 'the new normal'.

The gardens of properties which run along the Moors to the west end of the site are already very susceptible to flooding in autumn, winter, and even spring. What guarantees are there that the development would not increase this risk? In September 2024 there was a storm which resulted in extensive flooding to Mill Street and other areas in north Kidlington. The drainage ditch and pond on 'The Land Behind the Moors' were temporarily overwhelmed by the ensuing runoff and the pond overflowed. However, the system coped well and the excess water soon drained away. What guarantees do residents of The Moorlands, Meadow View and The Moors have that, were this system to be changed or removed, increased flooding would not be caused to their properties?

FLOODING ALSO AFFECTS NATURE ON THE SITE. When the Cherwell River overflows onto the floodplain meadow below 'The Land Behind the Moors', many species take refuge further from the river. This can be for long periods in the autumn or winter months. For example, herds of deer have been witnessed in the same fields that would be taken for housing. Deer can be seen in the first photograph below:



Flooding in different areas of the site, east, mid and west respectively



9) THE IMPACT ON THE LOCAL ROAD NETWORK WILL BE DISASTROUS.

All of the sites already allocated as part of the Local Plan have access directly onto major roads such as the A44, or the Banbury/Oxford and Bicester Roads. It is unacceptable that the proposed development only has access via minor roads which already experience traffic problems. The development proposal shows two road accesses onto The Moors, which is a narrow road with traffic calming measures (road humps) in place to counteract speeding in this residential area.

One of the proposed access points would be opposite Benmead Road which would undoubtedly experience an increase in traffic, especially as it does *not* have traffic calming measures in place. This is in spite of the fact that Benmead Road leads past North Kidlington Primary School, already subject to busy traffic and dangerous incidents of speeding and over-parking. The entrance to 'Homewell House' Retirement Apartments sits almost directly at this junction and 'Moorside Place' Care Home is very close by, therefore many elders use this junction and would be at risk from the increased traffic. Many carers and visitors to both homes are forced to park on the Moors.

The planning application proposes a roundabout at this access point, and argues that there are sufficient visibility splays in all directions. However, due to the above-stated reasons, this junction is notorious among local residents for lack of vision and over-parking. Traffic would also increase on High Street and Mill Lane both of which are local residential roads. Therefore, the idea of a roundabout and major access point at this junction are particularly offensive and concerning to the local community.

The application quotes that it already has 'agreement in principle' from Oxfordshire County Council from 2021; this is seriously out of date especially since traffic has greatly increased following the Covid 19 pandemic as people returned to work and normal patterns of travel. The application states that "the proposed development is anticipated to generate approximately 90 and 110 additional vehicle trips in the weekday morning and evening peaks" (i.e. a car out or in every 30 to 40 seconds). This seems a conservative figure given that 340 houses are currently proposed which may well possess 2 vehicles each, yet is nonetheless extremely troubling. It is highly unlikely that residents will not drive to work or school from this location, especially in the winter months. It is already extremely difficult to exit The Moors at the west end onto the A4260 due to heavy weight or traffic at all times of the day, the development will make this next to impossible with traffic queuing back along The Moors and causing congestion and pollution.

A local resident and neighbour has written the following:

"If a development is approved, during the construction phase (that will take years to complete) surrounding roads will see a massive increase in heavy construction traffic. Severe disruption to residents and the whole surrounding area will be experienced. Internet research has revealed that an average house contains approximately 150 metric tonnes of building materials. One HGV is likely to

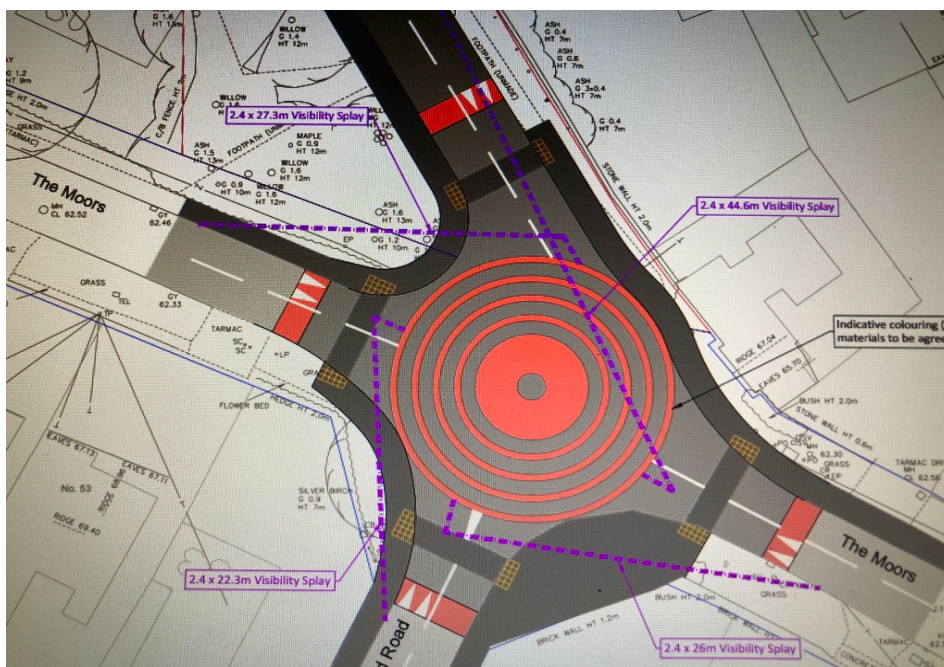
carry approximately 30 tonnes: for 3,400 houses that equals 51,000 tonnes of materials requiring 1,700 lorry loads. To build an average road takes approx 10K tonnes of material per km, equivalent to 333 lorry loads. These traffic volume figures exclude the removal of excavated soil, the provision of sewers, electricity, gas supply, telecoms work etc.

Once completed 340 houses are likely to produce at least 1000 additional traffic movements on The Moors and surrounding areas based on 2 per household per day, deliveries, visitors etc. This figure is likely to be even higher if used for school runs (2 per household each way) and for 2 car households. 1000 movements is probably an underestimate.”

Kidlington Development Watch have assessed the trip generation figures (TRICs) used by Bloombridge and note that these have been “significantly understated”. Instead of 846 (in itself a huge increase) they have found the that there would in fact be 1115 extra movements per day, 32% more than estimated.

The statements in the application regarding public transport are highly dubious, identifying buses which do not run, and bus stops which are not there. There is no ‘Homewell House’ bus stop and no 3 or 9 route serving the location, only the 2 and 2A with a stop around 500m from the southern edge of the site at the junction with Benmead Road. This will be a considerable distance for anyone living at the far northern edge of the site. Similarly, the ‘Moors turn’ bus stop is more like 500m (not 400m) from the western edge of the site where it joins The Moors at the farm gate access point. Again, this is a long distance to walk for anyone at the ‘back’ of the proposed housing estate.

Design of the roundabout on The Moors from the development proposal



10) THERE ARE CONCERNS REGARDING IMPACT ON SEWAGE CAPACITY.

The development proposal states that sewage will simply link into the existing system on The Moors. This is deeply concerning given that the pipework and infrastructure in this area is of some age and was not designed for this additional capacity. It is well known that Thames Water are currently unable to cope with sewage capacity and planned improvements will not be completed until 2031.

Thames Water states in their consultation document that:

“Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.”

One local resident on The Moors reported complete and devastating flooding to her ground floor during the September 2024 floods of the area. She was informed at the time by the Fire Brigade that they could not pump out her house because the drains were full and there was nowhere for the water to go. She also reports that the sewage problems adjacent to her house in St Mary’s Road are said to be ‘ongoing’ by Thames Water. It is unacceptable for local residents to be subjected to the consequences of an entire additional housing estate added to this infrastructure with no guarantees as to the subsequent effects.

Thames Water truck on The Moors during recent road closures due to sewage works



11) THE LAND MERITS LOCAL GREEN SPACE DESIGNATION.

Kidlington Development Watch (KDW) have long proposed that the site should be designated a Local Green Space (LGS), fully supported by Kidlington Parish Council and building on its own proposal for a 'Green Ring' around Kidlington. In Local Plan consultations there were a large number of responses from the public in support of KDW's proposals. KDW formally proposed the 'Green Ring' concept to CDC in 2021, including LBTM as an LGS. Cherwell supported the 'Green Ring' concept in an early stage of consultation and has assessed the Local Green Space proposal but has not as yet taken it up. It is important to be clear that a LGS designation does not involve a change in land usage (the land would remain agricultural and in private ownership) and that it does not enable any additional access to the land. Land cannot become a LGS to stop development, but if on other grounds land is designated a LGS it carries the implication that there should not be development.

The idea that the LBTM should be designated a 'Local Green Space' flows from the community's appreciation of the land simply 'being there' as arable fields protecting the valley and nature reserve beyond. It is not a request or desire for additional access to this privately owned land, but a recognition of its value 'in situ' and an appreciation of the public access afforded by rights of way and 'permissive' or informal paths.

The developer's offer of retaining a portion of this Green Belt land for sport is a step towards this but does not make up for the loss of the majority of the site to housing. Decisions around the re-distribution of land for various sporting activities around Kidlington need to be made as part of a full and complete sports strategy, taking the wider range of community needs into account.

The community needs more information regarding the S106 offer, what contribution will be given back to Kidlington towards infrastructure improvements or new facilities? It is understood that this offer will be £3million, is this correct? If so, how much of this would go directly to fund the new sport pitches and pavilion, would any be left over for other community needs? Will it be fairly distributed to improve other parks and open spaces, to increase access to other sports, or indeed to nature? If the site has to be sacrificed (which I argue strongly it does not), perhaps the community would prefer an extension to the nature reserve, a wildflower meadow, or other multi-purpose use of the land, either alongside, or instead of, sporting provision? All of this needs careful consideration by the District and Parish councils and the public should be further consulted.

There are many concerns around placing a full-sized commercial pavilion at such proximity to the church and nature reserve, including a car park with 50 spaces. This car park will take up a considerable portion of the retained 'green' area and will cause noise and access issues for local residents with most traffic to the site entering from the junction of The Moors and Benmead Road. Any change of use of this remaining Green Belt area should provide continuity with the peace, tranquility and openness it currently offers.

CONCLUSION: *'The Land Behind The Moors': arable land, historic setting and much-loved 'local green space'?*



In conclusion, the community are dismayed, devastated, distraught and angry at the prospect of a housing estate being built at this location in Kidlington. When Labour talked about the 'housing crisis' in the run up to the election they made assurances brown field and other disused or industrial sites would be taken for development in favour of Green Belt. Green Belt would be developed as a last resort.

This land is NOT our 'last resort' in Kidlington for housing but it IS our very last area of green space leading to open countryside and is a precious and much-loved asset. The sacrifice of this site overlooking the river valley and our wonderful church spire outweighs any potential benefits. Even the promised 50% 'affordable' homes will not be affordable in any real sense for Kidlington residents. It is even more galling that the cricket provision has been included to enable the housing development, and indeed vice versa. It is possible that the S106 money would, to all intents and purposes, go straight from the developer to the cricket club and most of the local community would not see any benefit from the little retained green space on the site.

An overwhelming level of investment that has gone into developing this project over the course of a decade or more, and into the professional reports which tweak the truth in the favour of the developer and do NOT reflect the facts as lived 'on the ground'. We ask that Cherwell District Council rigorously examine these documents, employing, where necessary, unbiased professionals who will check the them against the facts.

The main motive for the development of this site is profit, not benefit to Kidlington. Anyone might make a guess as to the potential profits available from developing this site; an estimate of 300 homes at an average cost of £500K gives a gross profit of £150million, perhaps a net profit of £100million once costs are deducted, from a site

which is worth only £1million as arable land. Other than intensive liaison with Kidlington Cricket Club, Bloombridge's 'community engagement' has been limited to a few meetings with Kidlington Parish Council. There has been no meaningful consultation with local residents until this point, when many feel there are too many odds (and certainly too much financial interest) stacked against them.

This is a truly intolerable circumstance and I object to this planning application in the strongest possible terms.

Dr Lisa Smith, Kidlington resident & campaigner
(address supplied in covering email)

