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Cherwell District Council
Development Management
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Your ref: 25/01346/OUT

Our ref: J0057666

By Email Only: carlos.chikwamba@cherwell-dc.gov.uk

29 August 2025

Dear Carlos,

LAND NORTH OF THE MOORS, KIDLINGTON (APPLICATION REF. 25/01346/OUT)

Carter Jonas is instructed by HarperCrewe Bloombridge Ltd. ('the Applicant') to write further to the comments received in connection with planning application reference 25/01346/OUT ('the planning application') which concerns the proposed development of land north of The Moors, Kidlington ('the site'). The applicant has reviewed the comments and has prepared new, additional and/or amended information to support the planning application.

The comments received on the planning application can be summarised as follows:

Objections

- CDC (Ecology)
- Kidlington Parish Council
- OCC (Highways)
- OCC (LLFA)
- CPRE Oxfordshire
- Kidlington Development Watch

No stated objection but additional information requested

- CDC (Urban Design)
- CDC (Arboriculture)
- CDC (Landscape)
- Historic England
- Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust
- NatureSpace

No objection subject to conditions/contributions

- CDC (Strategic Housing)
- CDC (Environmental Health)
- CDC (Recreation & Leisure)

- OCC (Archaeology)
- OCC (Education)
- OCC(Waste)
- OCC (Library Service)
- OCC (Archaeological Archives)
- Thames Water

No objection

- Active Travel England
- CDC (Conservation)
- CDC (Rights of Way)
- Thames Valley Police (Design)
- Sports England
- Environment Agency
- Oxfordshire Fire and Rescue Service

The applicant's responses to the comments are discussed in turn, below, and are grouped by discipline where appropriate.

Strategic Housing

It is noted that the Strategic Housing Team *"support this proposal in principle because it has the potential to provide a range of sizes of affordable housing to meet identified needs in Kidlington"*.

The Strategic Housing Team adds that to fully support the proposal the application needs to be amended to

1. Adjust the proposed affordable tenures to include shared ownership, and
2. Adjust the proposed unit size percentage range to align with the need identified in the Council's current housing register.

The applicant accepts these amendments.

Local Plan Policy BSC 3 states that where affordable housing is required, the tenure split shall be 70% rented and 30% intermediate affordable homes. The Developer Contributions SPD then confirms at paragraph 4.8 that intermediate housing includes shared equity, shared ownership and discount market sale.

It is proposed that the section 106 agreement secures the 70/30 tenure split between affordable/social rented and intermediate in accordance with Policy BSC 3. The section 106 should then include the following provisions to address the Strategic Housing Team's two points above:

1. 70/30 tenure split between affordable/social rented and intermediate, and
2. The definition of the intermediate tenure should include shared ownership and discount market sale in accordance with the definition in Policy BSC3, and
3. An 'Affordable Housing Scheme' shall be agreed with the Council prior to submission of reserved matters applications and which will provide, among other things, details of the tenure, type and size of the affordable housing units.

In addition to this, the applicant agrees to the section 106 agreement including the usual provisions relating to M4(2) Category 2 and M4(3) Category 3 units, the requirement for all social rented units to meet the

Nationally Described Space Standards, maximum size for affordable clusters, and that the affordable homes are indistinguishable from the market tenure housing.

Green Space Strategy

The applicant has noted the comments received from many respondents, including the Parish Council, about the proposed use of the 'St Mary's Field' landscape character area.

To be clear, the Land Use and Access Parameter Plan will fix this area as public open space. This will be secured through the planning conditions and future reserved matter applications will accord with this. As such, the outline application ensures that this part of the site remains open and undeveloped (and part of the Green Belt).

The applicant envisages St Mary's Field as community land and has reflected on the comments made by many respondents, including the Parish Council, that the community might be better served by a more natural area, rather than formal cricket use.

In response the applicant has explored a further option for the space (please refer to Section 10 of the updated Design and Access Statement). This presents the idea of an informal parkland area accommodating a range of uses, including formal and informal children's play, wildlife areas and woodland. This could present as a western extension of the two landscape character areas Church Field and Long Field that make up St Mary's Fields.

The Council's Open Space, Sport and Recreation Assessment and Strategies report (May 2020) identifies a long-established need for additional green space in Kidlington and as such this application is a unique opportunity to secure a significant area for such a use.

It is envisaged that the requirement to secure this community land will be set out in a section 106 agreement, with details being submitted for approval under planning condition as part of the details accompanying reserved matters applications. Any section 106 agreement could also include the requirement to engage with the Parish and District about the type of open space that comes forward (based on the two options now suggested). This allows local stakeholders to decide how they want this important new piece of community infrastructure to be used.

However, the applicant does not see any reason or benefit for provision to be required 'pre-commencement'. A better and more tailored result for the community is more likely to be achieved with a lead in of two or more years, for example to allow time for plans for the rejuvenation of Stratfield Brake to come to fruition (which, as originally proposed, may require replacement cricket pitches to allow for football and rugby expansion). In short, the applicant considers that providing options for this 4.4 hectare space now presents as an improvement to the originally submitted proposals.

As an aside, we note that many of the representations on the application refer to the loss of PRow. This is not correct. There are only two footpaths that cross the application site, as set out in the Design & Access Statement, and both are at the eastern end. There is currently 950m of PRow that crosses the site. The plan is to provide an additional 2,560m of publicly accessible footpaths on site, retaining all of the informal footpaths used with permission of the landowner. Moreover, the green space in front of St Mary's, irrespective of the option, will afford far greater opportunities for recreation than the current two PRows. Together, the improved accessibility and the new open space represent significant community benefits, as illustrated more fully in the Design & Access Statement and/or the Non-Technical Summary. We have provided the latter to help brief Councillors and other stakeholders.

Urban Design and Landscape

The National Planning Practice Guidance (PPG) states that:

“Applications for outline planning permission seek to establish whether the scale and nature of a proposed development would be acceptable before fully detailed proposals are put forward¹.”

The Government is clear therefore that the application of design policies must be proportionate to the type of planning application proposed. As such the PPG advises that parameter plans need to be used in a way that does not inhibit the evolution of detailed proposals².

It is expected that should planning permission be granted this will be subject to a planning condition to secure a Design Code prior to the submission of reserved matters, which is consistent with the approach on other housing schemes in Cherwell. It is standard for such conditions to require design codes to develop the principles set out in Design and Access Statements³. The reserved matters applications must then demonstrate compliance with the approved design code.

In view of this, it is the applicant's position that many of the points raised in the Urban Design response can be addressed through approval of a Design Code, which builds on the design principles in the Design and Access Statement. This will then provide the framework for the detailed reserved matter applications. Put another way, the applicant generally considers the design response to be helpful and interesting, but better resolved in full at the coding and detailed design stage.

Notwithstanding, the application has been reviewed and updated in response to comments received from CDC (Urban Design), Thames Valley Police (Design) and CDC (Landscape), with respect to the design elements of the proposed development. A series of topic-based response notes. Listed below, have been prepared by Macgregor Smith to explain how the applicant has responded to each point raised.

- Urban Design Comment Response
- TVP Comments Response
- Landscape Officer Comments Response

Accordingly, the following application documents have been updated in response to points raised by CDC (Urban Design), Thames Valley Police (Design) and CDC (Landscape).

- Land Use and Access Parameter Plan (Drawing No. 1360-010 Revision P6)
- Design & Access Statement (revised in response to consultation comments)
- Application Non-Technical Summary (revised in response to consultation comments)

Furthermore, in response to the point raised by CDC (Urban Design) regarding density a Density Parameter Plan (Drawing No. 1360-013 Revision P1) has been prepared to show how density could be accommodated on the site. Further commentary on this is provided in the Design and Access Statement and this will be developed further through the Design Code, which can be secured by planning condition.

However, it is important to be mindful of how the National Planning Policy Framework (NPPF) approaches the issue of density. At paragraph 124 the NPPF is clear that planning decisions should promote an effective use of land in meeting the need for homes. In view of this the NPPF states at paragraph 130(a) minimum densities should be applied to sustainable locations in order to optimise the use of land in their area and meet as much of the identified need for housing as possible. Indeed, this approach was taken for the Partial Review, including in relation to addressing advice received from the Local Plan Inspector, and as a

¹ Paragraph: 010 Reference ID: 26-010-20191001

² Paragraph: 011 Reference ID: 26-011-20191001

³ 23/03307/OUT

consequence most of the PR sites (and indeed the extant SE Woodstock application) include densities at 40 dph or more.

Given the acute need for affordable and market homes in Cherwell, it is critical that the proposals optimise density. The updated Design and Access Statement demonstrates how this can be achieved in a manner that relates well to and enhances local character.

Ecology

A technical note titled 'The Moors, Kidlington: Response to Cherwell District Council Ecology Comments (ref 25/01346/OUT)' prepared by Aurochs Ecology (dated 08 August 2025) along with a revised BNG Metric is enclosed with this submission and addresses comments received from CDC (Ecology), Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) and NatureSpace. A summary of the response to each is set out below.

CDC Ecology

The applicant has reviewed the comments received from CDC's Ecologist dated 2nd June 2025 which raised an objection pending the submission of amended BNG Metric, breeding bird surveys, bat surveys and a NatureSpace certificate in relation to great crested newts.

With regard to the Biodiversity Net Gain, the technical note confirms that the BNG calculation has been revised in line with the up-to-date site visit conducted in July 2025 and undertaken utilising the Statutory Defra Metric and associated condition assessment criteria. Reflecting the various amendments, the technical note concludes that the revised BNG outcome of the site is a net gain of 6.73 habitat units (+12.36%) and 1.53 hedgerow units (+14.67%). In both respects, a net gain in excess of the mandatory 10% is achieved in accordance with legislation and adopted policy. However, it is likely that the informal parkland option for the 4.4 hectares (set out in Section 10 of the Design & Access Statement) will add significantly to the BNG outcome.

The 'Breeding Bird Survey Report' prepared by Ecology Surveys is appended to the technical note and details the methodology, results and evaluation of the bird surveys completed between April and June 2025. With respect to bat surveys, the findings of an updated ground-based inspection of on-site trees anticipated to be lost or impacted by the proposals, is detailed in the technical note.

NatureSpace

NatureSpace confirms agreement with the ecological information submitted and that a Great Crested Newt (GCN) Licence can be obtained for the proposed development. In line with recommended action, the applicant has submitted the relevant paperwork to NatureSpace to secure a GCN District Licence.

Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)

The BBOWT consultation response dated 12 June 2025 includes similar comments to CDC Ecology in relation to the great crested newt licence, and the bat and bird surveys. These have been addressed above.

BBOWT also raised concerns about potential impacts on the nearby Lower Cherwell Valley Conservation Target Area (CTA) and of development within a Nature Recovery Network (NRN) Recovery Zone. For the sake of brevity we do not repeat the comments in the Aurochs Ecology technical note, however, in summary we find no reason or evidence to suggest that the proposals would adversely impact off-site ecology or prevent the wider landscape scale nature recovery. Quite the opposite, the proposals offer extensive opportunities to positively contribute towards these wider objectives and, where relevant, have been informed by locally identified conservation targets.

Highways

On behalf of the applicant SLR Consulting Ltd has prepared a technical note titled '*Response to OCC*' (dated 29 August 2025) which provides a comprehensive response to comments received from Oxfordshire County Council (OCC) and non-statutory consultees in relation to the transport and access elements of the proposed development. A summary of the response to each is set out below.

OCC has raised objection at this stage pending the submission of further information. That further information is appended to the technical note as follows:

- Pedestrian and Cycle Audit
- Proposed Pedestrian and Cycle Network Improvements, including new cycle and pedestrian crossings on Banbury Road
- Vehicle Tracking for proposed access points off The Moors

For the sake of brevity we do not repeat the comments in the SLR note here, however, it is noted that the Pedestrian and Cycle audit concludes that there is significant potential for journeys to be made from the site on foot or by bicycle in the existing network.

Notwithstanding, a range of local infrastructure improvements to the pedestrian and cycle network are proposed that would further cater for pedestrian and cycle travel and increase the already high sustainability credentials of the site and wider local area (as well as reinforcing the proposals compliance with the NPPF as regards Grey Belt policy). These improvements can be secured in a s106 agreement and would include:

- Tactile paving improvements at The Moors/High Street junction (for north / south movements);
- Provision of repeater signage/markings to identify High Street as part of the NCN;
- Provision of cycle markings on Green Road & The Moors;
- Maintain vegetation and explore potential to deliver streetlighting on public footpath between Green Road and Bicester Road/A4260;
- Tactile paving improvements at The Moors/The Moorlands junction;
- Tactile paving improvements at The Moors/Briar Close junction;
- Improved crossing facility on A4260 in the vicinity of The Moors;
- Maintain vegetation on A4260 on approach to Langford Lane (subject to location of A4260 crossing)
- Improved signage indicating the end of shared footway/cycleway on approach to Langford Lane from A4260;
- Tactile paving improvements at access to Thames Valley Police;
- Tactile paving improvements at Benmead Road/Ben Close junction; and
- Tactile paving improvements at Benmead Road/Deaufort Close junction.

In summary the SLR note, read in conjunction with the original Transport Assessment, demonstrates that the development proposals accord with local and national transport planning policy and would not have a severe residual impact on the local highway network or an unacceptable impact on highway safety. The location has been assessed as highly sustainable and there are opportunities to enhance this further. It is therefore concluded that the proposals will provide a sustainable development for the future in traffic and transportation terms

Flood Risk and Drainage

On behalf of the applicant, Baynham Meikle has prepared an updated Flood Risk Assessment and Drainage Strategy Report (dated August 2025) which responds to the comments received from Oxfordshire County Council as Lead Local Flood Authority (LLFA) dated 16 June 2025.

For the sake of brevity we do not repeat here the conclusions of the updated Flood Risk Assessment and Drainage Strategy Report. However, the updated report provides clarification in response to the LLFA

queries regarding storage estimate calculations, Thames Water capacity check and onsite infiltration testing results. It is also worth noting that in its response dated 10 June 2025 Thames Water confirmed that both the foul and surface water network has capacity to support the development.

It is also noteworthy that the LLFA considers the proposed drainage strategy to be acceptable in principle.

Reminder of the Public Benefits

The proposals deliver benefits that are substantial, urgently needed, and specific to the location and site, including:

1. The early delivery up to 340 homes at a time when Cherwell has a substantial housing land supply shortfall (2.3 years, amounting to 5,017 homes).
2. The parish has had no site allocations for local housing needs for three local plan cycles, despite such plan-led measures to achieve the full potential of Kidlington being entirely consistent with the district's established spatial strategy. It follows that development proposals in Kidlington offer much needed local benefits but also benefits to the wider district in terms of achieving a sustainable balance and proportionate growth across Cherwell, consistent with the settlement hierarchy.
3. As a Grey Belt site, 50% of the new housing will be affordable, for local people – this is a very substantial benefit, not achievable in the parish at the necessary scale through any other means.
4. Crucially, there are currently 2,080 households on the Council's housing register. This application will, as part of the affordable housing package, deliver 80% affordable/social rented tenure homes. This would equate to up to 136 homes that would cater for households in the greatest housing need. Furthermore, 20% of the affordable homes would be provided as discounted market sale, equating to 34 homes. This is a substantial social benefit.
5. The Moors is also very well-located to accommodate Oxford's unmet housing needs outstanding from the Partial Review and any further needs of the city beyond 2031.
6. There is a substantial need for new housing in Cherwell District. The development proposals will make a significant contribution to the delivery of both market and affordable tenure homes in this area – in the short term.
7. Housing in this location also supports nationally significant economic growth in Oxford and the emerging Science North cluster on the north side of the city where the availability of housing has had a constraining effect on growth and led to unsustainable commuting patterns.
8. The delivery of homes on this site presents a unique opportunity to provide a new and extensive area of community land (circa 4.4ha) for use as formal or informal recreation. As set out in the updated Design and Access Statement (Sections 9 and 10), in response to consultation responses, including from the Parish Council, the applicant has developed two options for this area. One being formal cricket use and the other a more informal natural space. In either scenario, the benefits to the community are extensive.
9. The application will alleviate rates of storm water runoff from the site (agricultural land) to the neighbouring residential area through attenuation and effective management as part of the SUDs design.
10. Bloombridge has appointed Harper Crewe as its housebuilder partner. Harper Crewe is a small/medium developer with a proven record of delivering high quality, carbon efficient homes. They are a market leader in this area and are targeting net zero for the new housing, as set out in the Sustainability Statement provided by Savills EARTH. The Council's adopted planning policies do not set a carbon reduction target and so the approach by Harper Crewe really is a substantial benefit. In view of the new direction the District is taking in the emerging Local Plan on carbon reduction, this scheme will stand as a 'tried and tested' exemplar.

Amended Plans / Documents

The following plans and documents accompany this letter.

Plan / Document Name	Prepared By	Reference
Location Plan	MacGregor Smith	1360-002 P1
Land Use and Access Parameter Plan	MacGregor Smith	1360-010 P6
Density Parameter Plan	MacGregor Smith	1360-013 P1
Urban Design Comment Response	MacGregor Smith	August 2025
Landscape Officer Comments Response	MacGregor Smith	August 2025
Thames Valley Police Comments Response	MacGregor Smith	August 2025
Design and Access Statement	MacGregor Smith	Rev 4, August 2025
Non-Technical Summary	MacGregor Smith	Rev 4, August 2025
Response to Cherwell District Council Ecology Comments	Aurochs Ecology	AE0035.CDC.Response.August 2025.vf1, dated 08/08/2025
Flood Risk Assessment and Drainage Strategy Report	Baynham Meikle	R100, August 2025
Response to OCC (Highways)	SLR Consulting Ltd	183898A, 29 August 2025
Access Drawings		
Proposed Site Access General Arrangement and Visibility Splays	SLR Consulting Ltd.	183898-PD15 B
Proposed Site Access Mini Roundabout	SLR Consulting Ltd.	PD05 F

I trust that this letter and the enclosed documents address the matters raised by the Council and other consultees, where revised or additional information has been requested. We hope this will now enable the application to progress to Planning Committee with a favourable recommendation in October or November.

Should you have queries with any of the matters set out in this letter or require further information, please do not hesitate to contact me. The applicant welcomes further discussion to progress the planning application towards a positive determination.

Yours sincerely,



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