

10 Vicarage Road
Kidlington
OX5 2EL

Saturday 10th January 2026

Ref: Further Representation – Objection to Application 25/01346/OUT (Land North of The Moors, Kidlington)

Dear Sir

I write further to my previous objection and having reviewed the officer's committee report recommending approval of application 25/01346/OUT. I wish to make a further representation addressing matters of planning judgement which, in my view, have not been adequately or correctly assessed and which weigh against granting permission.

-- Green Belt and Misclassification as 'Grey Belt' --

The application site is open, undeveloped agricultural land with no history of development and no urbanising features beyond public rights of way. It performs an important Green Belt function, maintaining openness and providing a clear buffer between Kidlington and neighbouring settlements, including Thrupp and Hampton Poyle.

The officer report's conclusion that the site should be treated as 'grey belt' is not supported by evidence. The land is not previously developed, degraded, or enclosed in the manner envisaged by national policy when referring to grey belt land. Proximity to the settlement edge alone is not a valid justification for downgrading Green Belt protection. Accepting this approach would set a concerning precedent, placing any open field adjacent to a settlement at risk.

By reclassifying the site, the report avoids the established requirement to demonstrate 'very special circumstances' to justify inappropriate development in the Green Belt. No such circumstances have been robustly demonstrated. General housing need and associated infrastructure benefits are generic considerations and do not outweigh the permanent harm to Green Belt openness.

-- Flood Risk, Drainage, and Infrastructure capacity --

The officer's report places reliance on drainage matters being resolved by condition at a later stage. This approach underestimates the known and documented flood risk affecting the site and surrounding area.

The land and adjacent areas experience regular surface water flooding. During the flooding events of September 2024, water levels in the drainage ditch and pond on this site reached capacity, with flooding impacts recorded in nearby areas including Mill Street and Hampton Poyle. The replacement of permeable agricultural land with built development and hardstanding would inevitably increase runoff and exacerbate exceedance events, placing downstream communities at further risk.

In addition to surface water concerns, there are legitimate questions regarding the capacity of local water and sewerage infrastructure to accommodate 340 new dwellings. Without clear confirmation that the existing network can support this scale of development, there remains a material risk of capacity issues or service disruption.

-- Environment Agency Consultation --

The officer's report notes that the Environment Agency has provided a 'no comment' response. It is important to clarify that a 'no comment' response does not equate to support or endorsement of the proposal, nor does it confirm that flood risk and environmental impacts have been satisfactorily resolved.

Given the known history of flooding on and around the site, the proximity to the River Cherwell corridor, and the reliance on future drainage strategies to be secured by condition, it is unclear whether the Environment Agency was in a position to fully assess the risks associated with this development at outline stage.

In these circumstances, limited weight should be placed on the absence of an objection, particularly where local evidence demonstrates existing flood pressures and where detailed, site-specific mitigation proposals have not yet been provided.

-- Impact on Heritage Assets and the Setting of St Mary's Church --

St Mary's Church is a Grade I listed building of exceptional historic and communal significance. Its setting is intrinsically linked to the surrounding open countryside, including views across the application site toward and from the church, churchyard and cemetery.

The introduction of housing, a sports pavilion, lighting and associated activity into this currently open foreground would permanently alter the church's setting and erode its historic relationship with the landscape. The officer's report underestimates this harm and does not demonstrate that it has been clearly and convincingly justified or minimised.

National policy requires great weight to be given to the conservation of designated heritage assets. In this case, the public benefits cited do not outweigh the harm identified.

-- Ecology, Wildlife and Loss of Undeveloped Habitat --

The site currently supports a range of wildlife, including regularly observed deer, swifts (endangered and protected species), and other farmland and edge-of-settlement species. Its open character allows movement between the River Cherwell corridor, surrounding countryside and nearby nature reserves.

The officer's report appears to rely on incomplete ecological assessments. Where consultees, including the council's own ecologist, have identified gaps in baseline habitat, species surveys and bird monitoring, it is unclear how the planning authority can reasonably conclude that biodiversity impacts will be satisfactorily managed.

The cumulative loss of habitat, the fragmentation of ecological connectivity, and the displacement of wildlife from an extensive area of open countryside cannot be adequately mitigated within a built environment. This harm would be permanent and irreversible.

-- Transport, Traffic and Highway Safety --

The transport assessment significantly underestimates likely vehicle movements arising from up to 340 dwellings in a location with no direct bus service and limited alternatives to private car use. The surrounding road network, including The Moors and nearby junctions such as Benmead Road, already experiences congestion and safety issues, particularly near a primary school and sheltered housing without parking.

The assessment also treats this site largely in isolation, without sufficient consideration of cumulative impacts from other permitted or proposed developments in Kidlington and surrounding areas. Increased traffic, even under conservative estimates, would exacerbate congestion, heighten risk to pedestrians, cyclists, children and elderly residents, and further stress local infrastructure.

-- Health, Wellbeing and Community Amenity --

The application site functions as an important area of accessible, informal green space for local residents and users of the public rights of way that cross it. National planning policy recognises the importance of such spaces in supporting physical and mental health and creating healthy communities.

Formal sports facilities and managed open space cannot replace open, undeveloped countryside used for quiet recreation. The officer's report gives insufficient weight to the loss of this amenity and its implications for community wellbeing.

Additionally, the emerging Local Plan process and strong local support for potential Local Green Space designation reflects the high value of these fields to the public for amenity, recreation, and biodiversity. This community support is a material consideration and should be given appropriate weight in the planning balance.

I would respectfully encourage Members to consider the proposal not only in abstract policy terms, but in how it would be experienced on the ground. Experiencing the openness, tranquillity and visual relationship between this land, the surrounding countryside and St Mary's Church provides an understanding that reports and drawings alone cannot convey. Decisions taken without this context risk underestimating the permanence and severity of the harm proposed.

-- Community Engagement and Meeting Accessibility --

Finally, I am concerned that the timing and location of the consultation/committee meeting, scheduled for a Thursday at 4 pm and held approximately half an hour's drive from the affected community, may prevent many local residents from attending due to work and travel constraints. Meaningful community participation is essential in planning decisions that affect local environments and wellbeing. More accessible meeting times and locations would better facilitate this engagement.

Conclusion

For the reasons outlined above, this proposal constitutes inappropriate development in the Green Belt, contrary to national and local planning policy. It would cause significant and irreversible harm to the openness of the countryside, heritage assets, biodiversity, flood risk management, highway safety, infrastructure, and community wellbeing.

The sheer scale of the proposal, far beyond infill or small-scale housing, means the impacts on landscape character, visual amenity, heritage settings, biodiversity, and local infrastructure would be profound and lasting.

I respectfully urge Members to **refuse this application in its entirety** to protect the unique character, environment, and wellbeing of the Kidlington community. I also trust Members will carefully consider the strong community concerns raised in this case and act with integrity and independence to make a decision that reflects the best interests of their constituents and the long-term wellbeing of the area.

Yours faithfully
Roy Peach (via email)