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Dear Planning Team,

Re: 25/01346/OUT North of the Moors Kidlington, CPRE Oxfordshire response

CPRE Oxfordshire wish to register their strong objection to this application.

Our top concerns in relation to this site are :

- It is open countryside in the OXFORD GREEN BELT
- The development would cause significant harm to the wildlife and ecology of the area. It is currently opposed by Cherwell district council's senior ecologist who has flagged up significant shortfalls in site evaluation which must be addressed prior to any decision
- It has been rejected in the latest Cherwell Local Plan following consultation. There is no need for this housing in addition to already adopted sites in the area
- The Land should be designated as a Local Green Space
- The development of the site will pose flooding risk to nearby homes
- It is next to St Marys Church, a Grade 1 listed building and heritage asset
- Traffic safety concerns and access to the site, both during construction and after development
- Infrastructure capacity limitations in the area



1) The site is in the Oxford Green Belt

This site is in open countryside on the outskirts of Kidlington. It is designated Green Belt land and is, in CPRE Oxfordshire's view, a truly classic example of the sort of land and aspect the Green Belt policy has been designed to protect.



National Planning Policy Framework (NPPF), states in para 142:

'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.'

CPRE Oxfordshire strongly oppose this application as it in the Green Belt and very clearly meets the above characteristics, which should be given "Great Importance".

The site must be rejected as it is Green Belt land.



The developer argues that this site should be categorised as "Greybelt". This is **NOT** the case for this site.

The government has previously described grey belt as "*poor quality and ugly areas*" on parts of the protected land called the Green Belt. This site very clearly does not fall into this category.

This site is beautiful, open countryside and clearly not land that should be defined as Grey Belt. The land also preserves the setting and special character of Kidlington and St Marys Church a Grade 1 listed building.

Should Cherwell planning team or any members of the planning committee be in any doubt of the visual beauty of this proposed site we would urge them to visit and CPRE Oxfordshire would be happy to facilitate and accompany any such site visit should this be helpful.

2) Wildlife, nature and ecology concerns

Deer, badgers, foxes, stoat, field mice, bats, slow worm, grass snake and adder are all present on this site. Otters have been spotted on the nearby 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).

This site is only four fields away from the River Cherwell. These fields close to the river regularly flood, causing the abundant wildlife in the area to seek refuge from the floods on this site.

CPRE Oxfordshire seek for the site to rejected based on the significant harm to wildlife and their habitat.

CPRE Oxfordshire fully support and endorse comments made by Megan Belanger, Senior Ecologist, Cherwell District council on 2 June 2025. She highlights significant failings in the scheme, namely the absence of:

- a scaled Biodiversity Net Gain Plan, to include the currently absent pond
- a Construction Environment Management Plan for CEMP for Biodiversity (to include a reptile RAMMS, soft-felling for bats, and other recommendations in the ecology reports)
- a Lighting Strategy
- pre-commencement surveys for badgers
- a Landscape and Ecology Management Plan (LEMP), and
- a Biodiversity Enhancement Management Plan (BEMP).

We ask you to note her comments that the scheme must be rejected until these vital assessments are undertaken.



3) The site has been rejected in the latest draft of the Cherwell Local Plan

This site, which was originally proposed in the Cherwell Local Reg 18 consultation was, following consultation feedback, removed from the REG 19 draft of the Local Plan. The principal reason for the rejection of the site was

" the land in 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. "

In addition, there is no need for these additional homes. In 2021 4,400 were allocated on Green Belt land surrounding Kidlington. Although these are yet to be built, plans are well progressed and will deliver in excess of this number, closer to 5,000 homes. These homes will serve the housing needs of the Kidlington community and the fact that they do not fall within the parish boundaries is superfluous.

CPRE Oxfordshire support the housing allocations within the Cherwell Local Plan, which has been thoroughly and democratically consulted upon. This site has been rejected following this process and its status should remain unaltered.

4) The site should be designated as a Local Green Space

This site has been proposed by Kidlington Development Watch as a Local Green Space (LGS), which CPRE Oxfordshire strongly supported. The current status of this application is that it has been rejected and CPRE Oxfordshire have flagged up at the Reg 19 stage of the Local Plan that we consider that the process for evaluating Local Green Spaces applications has been unfair and unduly complex. We are highly supportive of the LGS initiative, allowing local communities to assign and protect their cherished LGS, but feel Cherwell district council have failed in the implementation of this scheme.

We highlight that in the current Local Plan, 15 of the 17 successful LGS are in Bicester. Our member feedback is that Local Green Spaces in Bicester have had greater support and guidance from their local councillor to reach a successful outcome than in other areas.

CPRE Oxfordshire seek a full review of all Local Green Space applications at the Inspectors review of the draft Local Plan. We consider that development of this site should be rejected until such a review occurs and the site is reassessed.



5) The development of the site may pose flooding risk to nearby property

The land to the east of the site, where new cricket pitches and the pavilion are proposed, regularly floods. CPRE Oxfordshire are advised my members who are familiar with this site over many years that this is groundwater flooding. The consultant's report does not indicate or evaluate the impact of this ground water flooding. We consider that development of this site may cause flooding to neighbouring homes if there is inadequate provision for such run off water.

CPRE Oxfordshire seek further assessment and evaluation of the potential of this site to cause flooding to nearby homes prior to any progression of the scheme.

6) Next to St Marys Church, a heritage asset

Building houses and a cricket pavilion in close proximity to St Mary's Church in Kidlington, a Grade I listed property, would undermine the historical and architectural significance of this heritage asset. The church's setting is integral to its character, offering a sense of space, tranquillity, and historical continuity that could be irreversibly damaged by nearby development. The proposed development will disrupt key sightlines as the church will be viewed via "channelled vistas of built form" rather than open countryside. The proposed development will also alter the rural context, increase noise and traffic, diminish visitor experience and the church's role in the community and as a local landmark. Preserving the church's surroundings is essential to maintaining its cultural and historical value for future generations. Historic England have concerns about the impact of the proposed development and we fully support their views and those also put forward by Kidlington Watch.

CPRE Oxfordshire consider the site should be rejected on the grounds of the adverse aspect to St Marys Church, a heritage site.

7) Traffic safety concerns and access to the site, both during construction and after development

The proposed development raises significant concerns regarding traffic impact and safety. The area already experiences congestion during peak hours, especially around the school and junction to the A4260, introducing additional housing would inevitably increase the volume of vehicles, further straining the local road network. The two main access points into the proposed development are from residential streets which have limited infrastructure and scope for improvement. This part of Kidlington is ill-equipped to handle additional traffic, especially with the presence of schools and residential areas nearby. The added strain will lead to greater traffic bottlenecks, slower response times for emergency services, and a heightened risk of accidents, particularly for pedestrians and cyclists. There are no bus routes or stops in close proximity to the development so public transport links are not sustainable adding to the need for residents to use their cars rather than public transport. Ensuring that adequate transport infrastructure and safety measures are in place before proceeding with any development is essential to prevent exacerbating these issues and to safeguard the well-being of residents.



CPRE Oxfordshire have significant traffic safety concerns given the proximity of the access to the care home and on a junction leading directly to a primary school.

We also have concerns about the increase in the levels of traffic caused by this development and the accompanying pollution this cause. We note that 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 that there would in fact be 1115 extra movements per day, 32% more than estimated.

CPRE Oxfordshire seek this application to be rejected on the grounds that access to the site is unsafe and there will be unacceptable levels of traffic congestion both during and after development.

8) Infrastructure capacity limitations in the area

The existing local infrastructure is already under considerable strain, with planned developments likely pushing it to or beyond its limits. The transport network, which often operates at full capacity, will be significantly impacted, leading to greater congestion that affects both residents and businesses. The proposed improvements outlined in the Local Plan do not address the need for substantial capacity increases, relying instead on an unrealistic expectation that public transport, cycling, and walking can absorb the added pressure. Further, the proposed development behind the Moors would only intensify these existing challenges without offering any solutions. Additionally, local services such as schools, healthcare facilities, and dentists are already stretched thin, and this development would further exacerbate these pressures. The cumulative impact on infrastructure has not been fully assessed and understood.

CPRE Oxfordshire consider there will be adverse cumulative pressure:

- on the capacity of local schools
- on sewerage capacity in the area
- on road traffic, congestion and associated pollution
- on healthcare provision

We also highlight that Thames valley Police have flagged up "fundamental" concerns regarding this development in its current form and the risk it poses to increased crime rates.

CPRE Oxfordshire support and work alongside the local campaign groups Kidlington Watch and Land behind the Moors in objecting this site. We are happy to discuss any of our points with you should that be helpful and ask to remain updated on this application.



CPRE Oxfordshire hope that you will take due consideration of the objections we have raised and will reject the site outright , or at the very least , reject the site pending the satisfactory investigation and further assessments we flag as necessary.

Yours faithfully,

Lisa Warne E : <u>director@cpreoxon.org.uk</u> Director CPRE Oxfordshire