

Response to Cherwell Local Plan 2040 Consultation, October 2023

Part A Details.

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Introduction

KDW is a voluntary organisation run by Kidlington residents with experience and interest in planning issues. We believe that effective, informed public participation in planning consultations is vital to democratic policy making. We publicise consultations that directly affect Kidlington and offer advice on how people can best make their views known. We consider that we have a very good understanding of the views of Kidlington residents, a large number of whom have made representations because of our activities. KDW's representations therefore reflect the views of much of the Kidlington community. KDW is a member of the Cherwell Development Watch Alliance.

KDW recognises that the plan includes a number of positive or uncontentious proposals. This response only covers matters which are of greatest concern to us.

Overall Structure of Response: Our response is cross-referenced to the plan's questions or policies and covers the following:

District Wide Policies

Overall Level of Housing Need (the HENA, Question 19)
Provision for Employment (Question 8)
Green Belt (Policy 44)

Kidlington

Confusion in the plan between Kidlington and Kidlington Area
Housing Distribution (as it relates to Kidlington) (Question 20)
Land at the Moors (Question 43)
Land at SE Woodstock (Question 43)
Kidlington Green Ring and Green and Blue Infrastructure (Question 51)
Proposal for Local Green Spaces (in Kidlington) (Question 26)
Aspirations for the Kidlington area (Question 42)
Kidlington Employment Sites (Question 45)
Green Belt Boundaries at Langford Lane (Question 47)
Kidlington Infill Housing (Question from Options Consultation).

District Wide Policies.

Overall Level of Housing Need (the HENA)

(QUESTION 19: Do you have comments on the Housing and Economic Needs Assessment?)

The Housing and Economic Needs Assessment (HENA) is the latest in a series of Housing Need Assessments in Oxfordshire, produced by the same consultants, which over-estimate housing need by the use of a number of adjustments which are not well explained and difficult to follow. Previous assessments have all been found to substantially exaggerate housing need following independent analysis by a specialist consultancy commissioned by the Cherwell Development Watch Alliance (CDWA). It would appear that the current report does the same.

Overall, Cherwell is said to need 1009 dwellings per annum (dpa) 36% more than required by the Government's Standard Method, 742dpa, which also includes a 39% uplift to reflect affordability concerns.

The assessment for Oxford is even higher being 1,322dpa compared with the Standard Method Need of 762dpa.

Cherwell then seeks to add a proportion of Oxford's need on to its own assessed need, increasing its, already high, figure by a further 284dpa to give a total of 1273dpa.

KDW is a member of CDWA and we therefore refer you to CDWA's response to this consultation and its detailed comments on the HENA, and to the reports it commissioned, all of which we endorse. The overall conclusion is that the high levels of growth proposed in the HENA are not justified and particularly so in the case of Oxford. We note that South Oxfordshire, Vale of White Horse and West Oxfordshire Councils have all been highly critical of, and effectively rejected, the HENA's analysis.

We also note that the high housing requirement in the current plan, dating from a previous needs assessment by the same personnel, has led the Council into difficulties achieving a 5 year housing land supply. It has therefore been forced into using the much lower Standard Method figure in order to achieve this. This should give a strong message that, in future, **the Council should adopt a much lower housing requirement based on the Standard Method. The consequences of not doing so are again likely to be failure to achieve a five year land supply followed by speculative planning applications across the District. The Council should also strongly question the basis for Oxford City's need assessment.**

Provision for Employment

(QUESTION 8: Should we identify further land for employment?)

We are not able to comment on overall provision but are very concerned that the floorspace proposed on the land allocated for the expansion of Begbroke Science Park has increased more than three fold in a few years (see CDWA response for details). We note that Langford Lane Technology Park was given permission contrary to policy while there are a number of other large employment generating developments in this area. If this situation is replicated across the county, **we are concerned (like CDWA) that without more detailed policies to co-ordinate the employment generated on employment land, there could be substantial over-provision of employment land.**

Green Belt (Policy 44)

We support Core Policy 44 which says that the Green Belt boundaries in Cherwell District will be maintained.

We are surprised that, in the light of this policy, and the statement you made in the options consultation that no further revisions to Green Belt would be made for housing, you now propose to revise the boundaries. This is proposed even though there was a comprehensive review three years ago and that national policy is that Green Belt is a permanent designation (one of its two key characteristics) and, once established, Green Belt boundaries are intended to be maintained beyond the time horizon of a plan.

We therefore ask that you adhere to Policy 44 and to the statement you previously made that that Green Belt boundaries will not be revised further.

Green Belt acts as a whole and in the case of Oxford it “was designated to restrain development pressures which could damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area.” (Current Local Plan, p112, para B256) The adverse consequences referred to will already result from the major changes made in the Partial Review. No more change is justified.

Kidlington Specific Matters

Confusion between Kidlington and Kidlington Area

The plan presents information about Kidlington in an inconsistent and misleading way. In Chapter 6 of the Plan it generally refers to the ‘Kidlington Area’. This is clearly a much wider area than Kidlington Parish or the built up area of Kidlington. It includes Begbroke, Yarnton, Gosford & Water Eaton and at least part of Shipton-on-Cherwell parishes. The housing need sections, in Chapter 3, generally refer to “Kidlington” (para 3.170, p74 on) and treat the “Partial Review Sites” (the 4,400) separately without making clear that these are in the “Kidlington Area”. It is not clear which area “Kidlington” refers to in Table 5.

Housing Distribution (as it relates to the Kidlington area)

(QUESTION 20: Do you have comments on our emerging housing distribution?)

As a result of the confusion referred to above, Table 5 (p76) suggests that very little housing is being provided in ‘Kidlington’. In reality, a large number of houses are being provided on the village’s doorstep (in “the Kidlington Area”), but identified separately as Partial Review Sites.

The question in para 3.184 “*What does this supply tell us about meeting housing needs at Kidlington?*” is a leading one because the ‘Kidlington’ figures do not include the partial review sites.

The separate treatment of the Partial Review Sites is presumably because these were justified on the basis of meeting Oxford’s need. This arose from the unusual circumstance

that the Cherwell 2011-2031 Plan was approved by the Inspector on condition that the Council undertook a partial review of the plan within two years to find additional sites specifically to meet Oxford's unmet need – which at that point had not been established.

In reality however this is a quite artificial distinction. Most of the housing cannot be reserved for people 'from Oxford'. It is equally available to people 'from Kidlington'. The identification of a Kidlington need separate from a Cherwell or Oxford need is unrealistic. This was recognised in similar circumstances by the Inspector into the Vale of White Horse Local Plan who stated "in reality it would be all but impossible to determine if a potential occupier of this housing represents a Vale or Oxford 'housing need'." (para 25, VoWH Inspectors Report 30 Nov 2016)

We consider therefore that, because 4,400 new houses are already being provided in the Kidlington area, there is no justification for a further 900.

We also ask that the provision of 900 additional homes in Core Policy 76 is deleted from the plan.

Furthermore:

- The fact that a relatively modest number of dwellings have been built in Kidlington in recent years is not surprising as the village is surrounded by Green Belt and this shows that the Green Belt has been doing its job. The fact that the Green Belt is doing its job is not a reason for getting rid of some of it!
- The number of dwellings to be built on Partial Review sites is likely to significantly exceed 4,400 judging by applications so far submitted.
- We consider that the overall housing requirement (including provision for Oxford) is substantially overestimated making allocation of these sites (and others elsewhere in the District) unnecessary. **(See detailed response to Q19 above)**
- You have reduced by 3,000 the number of houses likely to be provided at North West Bicester by 2040. Surely, the fact that the developer does not intend to build these in the next 17 years means that these houses are not needed which adds weight to the argument for a lower and more realistic level of need.
- You have also substantially reduced your estimate of windfall sites (from the Jan 2023 draft of this plan). It is not clear why, but the effect is clearly to add to the pressure to identify further sites. If your original estimate was correct it would not be necessary to find more sites.
- While we do not consider there is any justification for a further 900 houses in the Kidlington area you, nevertheless, identify specific sites for 750 houses. Where do you expect the remaining 150 to be built?

We note that the plan says in para 3.189 "*We are not suggesting any ring-fencing of supply for Oxford in the way that we did in the 2020 Local Plan Partial Review.*" **In answer to your question in para 3.189 we agree that this is appropriate.** The background to the Partial Review was unusual as described above. It would be appropriate to include the Partial Review sites within the overall Cherwell supply as soon as practicable.

Finally in answer to another question in para 3.189 **there are no demonstrable exceptional circumstances for the potential release of land North of The Moors at Kidlington**, because of the existing provision in the Kidlington Area and because the overall need is overestimated as described above.

Possible Housing Sites in Kidlington and SE Woodstock.

(QUESTION 43: Do you think these sites in the Kidlington area should be explored further for potential allocation for housing?)

For reasons given above, and in particular the existing allocation of 4,400 houses **we do not agree** that Land behind the Moors or land South East of Woodstock should be explored further for potential allocation for housing.

You appear to have agreed with this at the time of the options consultation saying *“Due to the planned housing growth at Kidlington and the Green Belt we have not included an option for further residential development at this time beyond that identified in the Partial Review.”* We agree with this decision and query why this site has now been included.

Land behind the Moors

This site should not be included in the plan. It is a Green Belt site and Green Belt boundaries are meant to endure beyond the lifetime of a local plan. Given that a major revision was made to Cherwell’s Green Belt boundaries only two years ago (in a plan for the period to 2031) it is hard to see how further revision can be justified now.

One of the two essential Green Belt characteristics listed in the NPPF: openness fits this site about as well as any site can (the other characteristic is permanence). No development or road intrudes into the meadows whatsoever, the nearest buildings beyond the village boundary being in small hamlets well beyond the river Cherwell.

Cherwell officers have been quoted as saying that the site has “Low Green Belt value”. This is illogical when taken alongside the statement in the current plan (para B256) that the Oxford Green Belt “was designated to restrain development pressures which could damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area.” The site contributes to that aim as do all sites in the Green Belt.

It appears that the GBI Strategy does not envisage development in the area it describes as “Kidlington Fields” (which includes this site). It shows an “enhanced access point” at Homewell House.

Further reasons why this site is unsuitable for development are that

- the area is crossed by public footpaths and there are many well used informal footpaths, showing how much the fields are enjoyed and appreciated for recreation.
- the fields provide a unique setting for St Mary’s Church and have archaeological interest related to the Iron Age, Roman and medieval periods.
- the fields are relatively small and bounded by hedges and trees which therefore support a variety of wildlife, particularly various bat species, birds and including rare wildlife species such as Short Eared Owls and Skylarks. Foxes, deer, weasels, field mice and grass

snakes are seen. There is a small pond where a footpath meets the Moors where great crested newts have been found in the past.

- The fields are in the 'Recovery Zone' of the Oxfordshire Nature Recovery Network and adjacent to the Lower Cherwell Valley Conservation Target Area and the setting of the River Cherwell Valley (as the plan itself says).
- Options for vehicular access are limited and the Moors itself is already subject to traffic calming measures.
- There is potential to create flooding problems on adjacent land due to run off from new hard surfaces.

This site is being put forward by us as a proposed Local Green Space (see response to Q26 and LGS proposal appended).

Kidlington Green Ring and the Green and Blue Infrastructure Strategy (QUESTION 51: Do you have any comments on the green and blue infrastructure proposed for the Kidlington area?)

The Options consultation referred to Kidlington PC's wish to establish a ring of connected green spaces around Kidlington. Kidlington Development Watch (KDW) supported this and added proposals for two new Local Green Spaces. Neither the Green Ring nor the LGS proposals are taken up in the plan. Nevertheless, we welcome many of the projects proposed in non-statutory Green and Blue Infrastructure Strategy. We would like to see an explicit reference to the Green Ring proposed by KPC with specific proposals to support it including creation of three Local Green Spaces proposed by us.

Proposal for Local Green Spaces (in Kidlington) (Question 26) (QUESTION 26: Would you like to propose any sites for consideration as Local Green Spaces?)

We wish to propose 3 Local Green Spaces, one new proposal and a request to reconsider two others.

Stratfield Brake Proposed LGS – New Proposal.

On 3rd November 2022 we wrote to you with a proposal for a further Local Green Space at Stratfield Brake (e-mail to Andrew Macted from KDW). At that time we wished to put our proposal on record but said that we would also submit it to this consultation which, at that time, was imminent. **We now therefore put Stratfield Brake forward as a third and new proposal.** Our detailed justification is appended.

Request for Reconsideration of Previous Proposals.

In our response to the previous consultation we proposed two Local Green Spaces.

You rejected our proposal for "Bury Moor Fields" because you are putting the site forward for development. This is a circular argument. Our proposal should have been considered on its own merits. We note that many of the key constraints you list on p260 of the draft plan are factors which support designation as LGS while some of the "opportunities" could be gained or are not necessary if the site is not developed.

We also note that the site was specifically not proposed for development at the time of the options consultation and you stated that you were not proposing further residential development in the Green Belt. Finally, you do not appear to have taken into account that the proposal was strongly supported by Kidlington Parish Council as part of its proposal to establish a “Green Ring” around the village.

We are opposed to any development on these fields as they are one of the only ‘tranquil’, open and undeveloped areas around the village. However, we note that you propose that the fields nearest St Mary’s Church should be retained in the Green Belt and we consider that the LGS designation should be applied to them, in the event that the allocation of the other fields remains (and which we strongly oppose).

You rejected our proposal for the “St Mary’s Conservation Area Green Space” because you consider that it is sufficiently protected by Conservation Area designation. We argue that the site is important for its recreational value, beauty and tranquillity, richness of wildlife, as well as its historic significance. A key characteristic of the area is its openness and the views of the church and conservation area that it permits. These are not all protected by conservation area status. Also you do not appear to have taken into account that the proposal was strongly supported by Kidlington Parish Council as part of its proposal to establish a “Green Ring” around the village.

We therefore propose these sites for re-consideration as Local Green Spaces and attach our detailed justifications.

LGS and Green Belt. Please consider the following extract from Planning Policy Guidance when considering these proposals.

“One potential benefit in areas where protection from development is the norm but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community”. (Paragraph: 010 Reference ID: 37-010-20140306)

We consider that this applies specifically and very well to the three sites we proposed, which are all in the Green Belt (and therefore “protection from development is the norm”) and which are all “of particular importance to the local community”.

See: Appendices (separate document):

Appendix 1 Proposal from KDW for Stratfield Brake Local Green Space

Appendix 2 Proposal from KDW for St Mary’s Conservation Area Local Green Space

Appendix 3 Proposal from KDW for Bury Moor Fields Local Green Space

QUESTION 42: What are your views on our aspirations for the Kidlington area?

“Provide enough market and affordable homes to address local needs” As discussed above we consider that more than enough homes for ‘local needs’ are being provided through the partial review sites.

“Build on the area’s excellent links to Oxford, Bicester and London by public transport and work with County and Parish councils to deliver safe and inclusive routes that facilitate car

free movements as the first choice for residents and visitors;” We support the improvement of public transport and safer routes for cyclists and pedestrians. However, the Council must acknowledge that many journeys will still be made by car and that car free movements will very often **not** be the first choice. We are concerned that the Council is over optimistic in anticipating a large modal shift to accompany the already planned developments and that substantial traffic congestion will result.

QUESTION 45: Do you agree with the employment sites we have selected at Kidlington to accommodate new employment development?

The 14.7 hectares proposed for the expansion of Begbroke Science was originally intended to “accommodate approximately 46,000 sq m of employment space”. (Source: Small Scale Green Belt Review Accommodating High Value Employment Needs at Kidlington/Begbroke in Cherwell District. Prepared by LUC with BRP Regeneration, November 2016). In the recent outline planning application 155,000 sq m of floorspace is proposed. This is between 3 and 4 times as much floorspace on roughly the same land area and implies a three to fourfold increase in employment. At 30sq m per employee the increase would be from roughly 1500 new workers to over 5,000. Such a big difference has major implications for strategic planning. It is not clear whether you have taken this into account and we suggest that it should be taken into account because it would represent a very substantial increase in employment.

It is debatable whether there would be a demand for such a large amount of floorspace, especially when taken with the other large amounts of employment floorspace proposed or under construction in the area (for example at Oxford North, Oxford Technology Park and Eynsham). Indeed, long established and similar developments south of Oxford (Oxford Science Park and Oxford Business Park) are still not fully occupied or built out.

However, if all of the proposed development were indeed to be built and occupied it would make ‘levelling up’ much more difficult to achieve and would result in the opposite situation where potential development is diverted away from areas of the country which could particularly benefit from it, perpetuating and widening the economic divide.

The Council should therefore seek to limit the amount of new development on the site to that originally proposed (46,000 sqm) in floorspace terms and give an indication of the number of jobs anticipated.

QUESTION 47: Should this Plan adjust Green Belt boundaries in the Langford Lane area in response to recently developed land?

We are appalled that permission should be given for Oxford Technology Park while the site was in the Green Belt. This should not have happened. It suggests an ad-hoc, piecemeal approach which is not consistent with coherent strategic planning. It should also be noted that the first development on the site was a hotel and one of the first occupiers, a strategic house builder. Neither are technology businesses. This suggests that the Council should be

very wary of taking the applicant's submissions at face value. Given that the site is partially developed it now seems irrelevant whether it is within or outside the Green Belt.

Kidlington infill housing – policy to control redevelopment to apartments. (Question in the Options Consultation. p89)

You included this issue in the options consultation but it seems to be omitted from this consultation. We think that such a policy is needed. Our original response is copied below.

We agree that a policy to control redevelopment for apartments is needed. It is for Cherwell District Council to identify criteria for such a policy and no doubt you will be able to find examples of policies in other authorities and/or in guidance. However, we consider that issues to be addressed would include:

- capacity of the local road network
- safety of access to the local road network
- adequate parking provision so as not to require further on-street parking
- new hard surfaces (for example for parking) to be limited so as (a) to prevent excess water run-off and (b) to be in keeping with the landscaping of surrounding properties
- development not to be out of scale or overbearing compared with surrounding buildings
- development not to overlook neighbouring properties or to result in additional noise in comparison with the pre-existing situation
- conversions should provide a decent standard of living accommodation with adequate space and daylight standards
- the number of apartments to be limited in the light of what can be accommodated within the existing building envelope and typical buildings on surrounding plots.

We suggest that the Council prepares a design guide, addressing these issues, particularly with regards to development along the main Banbury/Oxford Road in Kidlington.

Appendix 1: New Proposal from Kidlington Development Watch (KDW) for Local Green Space at Stratfield Brake

This is a proposal for a local green space at Stratfield Brake in addition to the two sites put forward by KDW to the north and north-east of the village at the Options Consultation stage. Since that consultation the County Council (site owners) have entered into discussions with Oxford United FC about the possible development of the site for a 18,000 capacity stadium and substantial commercial development. As the site is in recently confirmed Green Belt this would be contrary to the current local plan and national policy. Planning Practice Guidance states that, in the Green Belt, *“Local Green Space designation could help to identify areas that are of particular importance to the local community”*. We consider that Stratfield Brake is a prime candidate for designation and wish to make this proposal in advance of any planning application that might come forward in future.

The proposed site is shown on the aerial photo below.



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

Proximity to the local community

The area is almost immediately to the south of the Garden City area of Kidlington and Gosford Hill (which is in Gosford and Water Eaton Parish). It consists of sports and recreation grounds (within the dashed line) and a nature reserve managed by the Woodland Trust. Almost all of the site is freely and easily accessible to the public due to its proximity to homes in Kidlington, public transport links and car park. There are many informal paths running through the nature reserve, while the playing fields are available for formal and informal recreation. A footbridge gives access to the canal towpath, a further well used recreational route.

In addition the area immediately to the north is an allocated housing site in the Local Plan Partial Review (PR7b – Stratfield Farm), while to the east is a further site (PR7a- land SE of Kidlington).

Demonstrably special to a local community and holding a particular local significance

The land was acquired by the County Council many years ago, specifically to protect it from development and to maintain the gap separating Kidlington from Oxford. Subsequently it and other land surrounding Kidlington was designated as part of the Oxford Green Belt. Recently, much of the Green Belt around Kidlington has had this status removed to accommodate the housing allocations in Cherwell's Local Plan Partial Review (including PR7a and PR7b mentioned above as well as the large sites on PR6a & b). However these allocations were made on the basis that Stratfield Brake would remain undeveloped within the Green Belt, the Planning Inspector's report stating that the plan would result in "clear, defensible boundaries" to the Green Belt.

With the allocation of sites PR6a, PR6b, PR7a and PR7b for housing in the LPPR, Stratfield Brake is now almost the only remaining piece of Green Belt in the area where the gap between Kidlington and Oxford is at its narrowest. It therefore has huge significance to the local community in retaining Kidlington's identity as a distinct settlement, separate from Oxford. Immense concern has been expressed locally about the possible development of Stratfield Brake.

Recreational value

The north-eastern part of the site consists of recreation grounds managed by Kidlington Parish Council which, along with Gosford & Water Eaton Parish Council, holds a long term lease on this area. There is a modern clubhouse and sports pitches. The grounds are used by a number of clubs, for example rugby, cricket and running, as well as being extensively used for informal recreation

The remainder of the site is managed as a nature reserve by the Woodland Trust. Its website (<https://www.woodlandtrust.org.uk/visiting-woods/woods/stratfield-brake/>) describes it as follows:

“Just a few kilometres from the centre of Oxford, Stratfield Brake is a peaceful oasis that’s perfect for getting close to nature throughout the seasons. In a landscape with little accessible woodland, the woods are a joy to walk through and the wetland is great for birdwatching.”

Richness of Wildlife

The Woodland Trust describes the site as follows:

“Stratfield Brake is an oasis for wildlife, especially birds. 96 different bird species have been recorded here, including both woodland and wetland species. Look out for the large rook colonies that have made Stratfield Brake their home for many years.

The wetlands provide the perfect conditions for dragonflies and water birds, and the mature woodland is a habitat for fungi, mosses, insects and bats.”

“Stratfield Brake has a mixture of habitats, including mature and young woodland, open water and wet grassland. The new wet grassland area is part of a local cluster of wetlands which enables species to move between sites, creating ideal conditions for dragonflies, damselflies and wetland birds.”

The recreation grounds provide an important buffer to the nature reserve separating it from the built up area of Kidlington. This buffer acts as an extension to the habitat of the nature reserve and contributes significantly to the quality and quantity of biodiversity which would inevitably decline were this buffer to be removed.

Beauty and Tranquility

These are subjective and relative criteria. However the Woodland Trust’s comments sum up the value of the site well: “Just a few kilometres from the centre of Oxford, Stratfield Brake is a peaceful oasis that’s perfect for getting close to nature throughout the seasons.”



The western end of the Nature Reserve

The nature reserve is complemented by the open spaces of the recreation area which provide one of the remaining protected Green Spaces between Oxford and Kidlington offering the opportunity to feel “out in the open” while to an extent shielded from roads and other urban activities by the trees of the Woodland Trust site.



The sports grounds seen from the eastern end of the site

Local in Character

Guidance says that a LGS site should not be extensive in nature but does not define extensive. The site is not an “extensive tract of land” and has clearly defined boundaries. It is certainly not extensive when compared to the areas of land that have already been removed from the Green Belt. We are aware of examples elsewhere of similarly sized sites which local authorities have deemed suitable as LGS.

Important. We consider that this is not an “extensive area” and that the two parts of the site complement and reinforce each other. However, if the proposed area is deemed to be too large, it should not simply be rejected. Instead, consideration should be given to designating the recreation grounds alone as LGS.

Appendix 2: Proposal from Kidlington Development Watch for a Local Green Space to protect the Church Street Conservation Area and setting of St Mary's. Re-submission, please see main text for explanation.

This is one of the two specific local green spaces proposed by KDW north and north-east of the village. The site is shown on the map below. Note that it lies wholly within the Church Street Conservation Area forming part of the Church Fields Character Area.



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

Proximity to the local community

The area consists largely of paddocks for horses immediately adjacent to the built up area of Kidlington. A well used public footpath runs along its eastern boundary which can be accessed both from the historic almshouses next to St Mary's Church and at Mill End, and from the publicly accessible fields in the ownership of the Branson family. Although most of the proposed LGS is in private use and not accessible, guidance makes clear that green areas which are valued because of their wildlife, historic significance and/or beauty may nevertheless be designated as LGS (see PPG Reference ID: 37-017-20140306). In this case, the whole area is visible from the footpath, is within the conservation area and must remain undeveloped in order to provide the fine setting for St Mary's Church and other historic buildings which the conservation area seeks to protect.

Historic significance

The proposed LGS lies wholly within the designated Church Street Conservation Area and within that is part of the Church Fields Character Area. Discussing this character area, CDC's own Conservation Area Appraisal states that:

"The public right of way is an ideal place to see the rear of the properties on Church Street and Mill Street. The paddocks stretch right up to the high walls of the properties, and shows how easily inappropriate development to the rear can be detrimental to the conservation area. At present, the high walls and vegetation blends the line between fields and houses, and this symbiotic relationship should be protected."

The proposed LGS is also part of the setting for St. Mary's Church. 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 a large, Grade I listed building, dating back 800 years and has an exceptionally tall and slender steeple (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.

It is essential to retain the fields in the proposed LGS to maintain both the beautiful setting of the magnificent church and the conservation area as a whole. The conservation area includes not only Church Street but extends along Mill Street and includes Mill End. It contains many old houses and Grade II and II* listed buildings including the beautiful and possibly medieval Grade II* Dovecote, Grade II* Vicarage and Grade II Church Street Farmhouse and other Grade II houses and almshouses near the church. As mentioned in the quote from the Conservation Area Appraisal, these buildings and their high walls can be appreciated from the well used and historic footpath which runs along the eastern edge of the proposed LGS. (see photo below)



The footpath itself is historic. It was the subject of an enclosure award of 1818 and should be ten feet wide throughout its length. However, it almost certainly existed in the middle ages. An eminent historian, living locally and specialising in medieval history, comments that :

“ the footpath must have been medieval and its purpose was to link the area around the church, where there was much housing, with the two mills, one on each side of the river, at Mill End, now houses (but with the mill machinery still in place, I'm told). It's highly likely that the path provided a route for manorial tenants to take their corn for milling. The ridge-and-furrow to the right of the footpath, and also running across it, proves that at one stage this was good arable land, under the plough.”

The historic ridge and furrow lies on fields to the north-east of the footpath and is a reminder of pre-enclosure Kidlington. These lead without interruption to further fields (and further ridge and furrow) and the River Cherwell itself. The openness and low-lying nature (liable to flooding) of the whole area is a key element of the landscape here.

CDC's own 2014 SHLAA rejected this site as suitable for development stating that:
“development would result in the loss of an important gap within the Church Fields Character Area and would adversely affect the setting of the Conservation Area. There would also be some detrimental impact on the character of the Mill Street area to the south.”

Recreational value

The footpath along the edge of the proposed LGS It is now part of the Oxford Green Belt Way, a 80 km route encircling Oxford. It is extremely well used both by local people and visitors undertaking longer distance walks. Its recreational value is, of course, closely tied to the historical importance of the site, the Conservation Area Appraisal making clear how the footpath allows an appreciation of the character of the village here. The openness of the

land either side of the path is essential to its enjoyment. The views from it, both north and south, of the church and other historic buildings really do take the walker back in time. The idea of a 'village in the landscape' is demonstrated here better here than anywhere else on the edge of Kidlington.



View towards St. Mary's Church and other village houses (listed) from the Public Footpath..

Beauty and Tranquility

The views here of the church and the village are indeed beautiful (see photo above) and with no roads in the vicinity, the area is also tranquil. It is on the edge of the open, undeveloped countryside of the Cherwell Valley.

Richness of Wildlife

The whole area abounds with wildlife. Badgers, foxes, roe deer, squirrels, weasels and grass snakes are to be found in the proposed LGS itself. A survey of the site undertaken in 2013 by an RSPB officer identified 27 species of breeding birds including several on the current RSPB red list (cuckoo, mistle thrush, song thrush, starling and house sparrow) and the amber list (swift and dunnock). Other species observed by local residents include grey wagtail, heron, buzzard and sparrow hawk, great spotted woodpecker, green woodpecker, house martin, swallow, linnets and whitethroat as well as bats. The RSPB officer also commented that an ungrazed field within the site was rich in wild flowers and contained a wide range of plant

species. Invertebrate species recorded included Brown hawker dragonfly, Gatekeeper, Large skipper and Meadow brown butterflies.

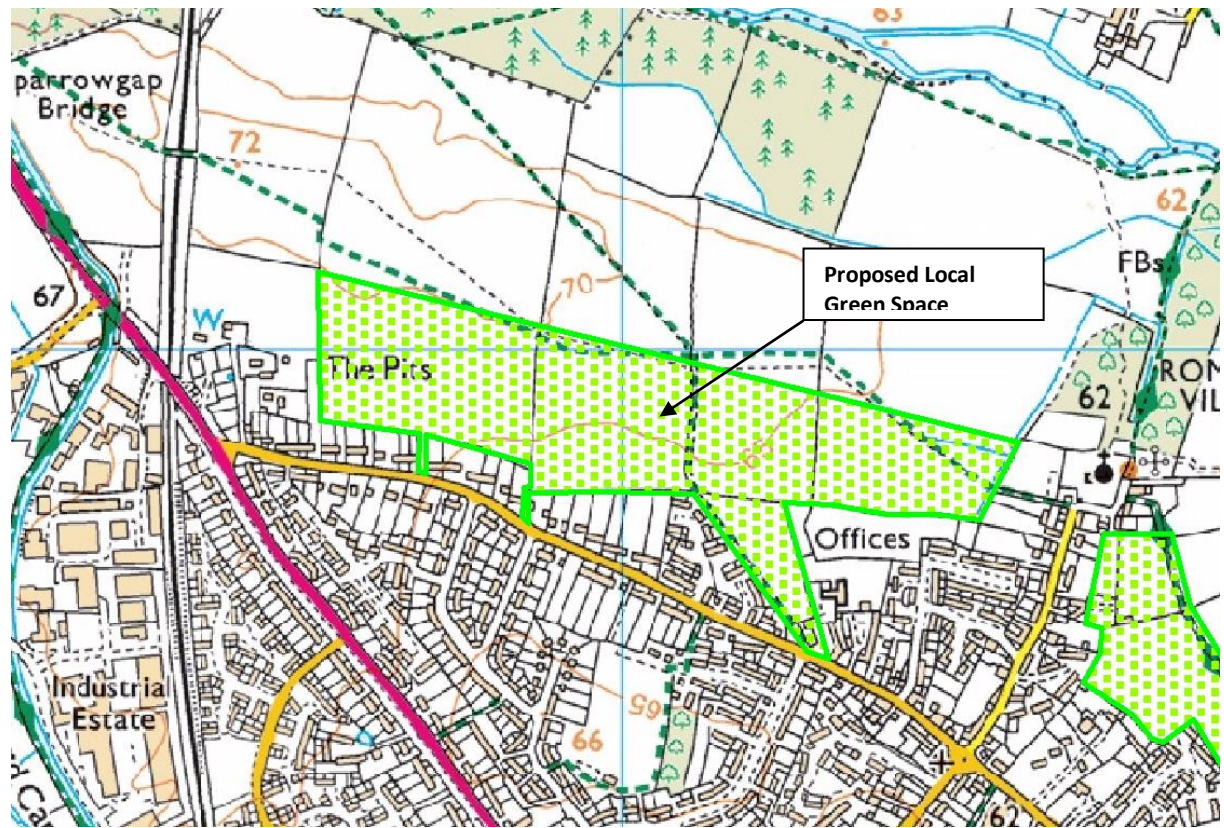
The proposed LGS also adjoins a proposed Local Wildlife Site (Kidlington Meadows, BBOWT ref 41X02) and is part of open land leading to the Cherwell Valley Conservation Target Area.

Local in Character

This proposed site is local in character and not extensive. The proposed LGS consists of a relatively small area of paddocks which is of historic significance to the community. It is essential to maintain it as Green Space in order to protect the character of the Conservation Area as is acknowledged in the Conservation Area Document and 2014 HEELA. and also for the enjoyment of users of the Public Right of Way.

Appendix 3: Proposal from Kidlington Development Watch for a Local Green Space at Bury Moor Fields. Re-submission, please see main text for explanation.

This is one of the two specific local green spaces proposed by KDW north and north-east of the village. 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 (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.

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.

Important. We consider that this is not an extensive area. However, if the proposed area is deemed to be too extensive, it should not simply be rejected. Instead, consideration should be given to designating individual fields (or combinations of fields) as LGS.
