Bloombridge
Development Partners

15 March 2024

Cllr David Robey
Chairman
Kidlington Parish Council
Exeter Hall
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By email only: david.robey@kidlington-pc.gov.uk

Dear Councillor Robey,

CHERWELL LOCAL PLAN REVIEW (SITE LPR8A)
THE MOORS, KIDLINGTON, OXFORDSHIRE

I am writing to invite Kidlington Parish Council to engage formally with us on the proposal in the Regulation 18 draft of the Cherwell Local Plan Review ('CLPR') to allocate our 21 hectare site north of The Moors, Kidlington (CLPR reference LPR8A). The land is owned freehold by the Bulford Trust and Bloombridge LLP holds a long term Option to Purchase.

You have told me that the Parish Council has submitted objecting representations as part of the consultation last year. I am comfortable with that; it is an entirely normal and acceptable position for a Parish Council to take at this stage of the plan-preparation process. But I wish to engage so that we can respond on points of concern to the Parish Council and clarify any technical questions. This will help keep the dialogue focussed and accurate, whilst ensuring that (if the site allocation is maintained) the final policy reflects the views of the Parish Council, including those members of the community who are supporting our proposals.

We are partnering with Harper Crewe, a high quality housebuilder, very different to the mainstream, volume housebuilders. This is a formal joint venture, set up with the objective of demonstrating that your Council can engage with us (subject to an allocation and planning permission) as the people who will be delivering development north of The Moors.

I appreciate that formal engagement with the Parish Council may need to wait until after the local elections on 2 May 2024.

Background

The site has been promoted for housing since 2013 and was originally considered as a draft proposal for development linked to the regeneration of Kidlington village centre in the draft Alan Baxter Masterplan for Kidlington. The site was also considered as a sustainable and 'reasonable option' for the development to help meet Oxford's unmet housing need as part of the Cherwell Local Plan 2011-2031 (Part 1) Partial Review (Site Reference PR14). The site was not pursued by Cherwell only on the basis that sites already proposed for allocation in the submission draft plan were sufficient to meet

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Oxford's unmet needs. However, of the 4,400 houses taken out of the Green Belt only 120 units are in Kidlington, and none allocated for Kidlington's local housing needs. There was also no housing allocated for Kidlington in the Cherwell Local Plan, adopted in 2015.

These housing need arguments are brought into sharp focus by the appeal allowing 230 units at Heyford Park, issued on 5 March 2024 (APP/C3105/W/23/3326761), where paragraph 77 of the decision letter records a 2.26 housing land supply (according to the appellant) and 3.32 (according to Cherwell), but in both case below 4 years. This is a serious shortfall. Whilst we understand that third parties and the Council are considering making a legal challenge to the appeal decision, the consequences of under supply and affordability are readily apparent in the Kidlington housing market. For example, the number of HMOs, the lack of affordable housing for local people and key workers, combined with pressure on infrastructure, services and the public realm arising out of a lack of a positive development plan for Kidlington. The Alan Baxter Master Plan is a fine piece of work, but the linkage with development (and therefore funding for the various initiatives) was taken out at the final draft stage, in 2014, before adoption of the Kidlington Framework Masterplan SPD (December 2016).

Cherwell Local Plan Review 2040 (Site LPR8A)

We have undertaken survey and technical assessment work and informal consultations with local stakeholder groups and members of the community to support the development proposals for the site. We have also engaged with CDC's Planning Policy Team to support the CLPR by sharing draft masterplan proposals and survey work and providing comments on the draft 'proforma' for site reference LPR8A. The 'proforma' included a list of key objectives, urban design principles, key development considerations, infrastructure and social/community considerations, and technical considerations related to landscape, biodiversity, access, flood risk and drainage for the site, although the text did not form policy wording setting out specific requirements for the site to deliver.

There were a number of references in the January 2023 version of the LPR8A proforma that we felt were potentially misleading. Examples of this include the reference to a medieval moat outside of the site (this has not been proven by any assessment, it is merely a waterfilled ditch) and reference to a waste management facility 0.5km outside of the site (which would not affect the site's delivery), amongst others. We have similar reservations around flood risk (this is not an issue based on our site assessment work to date) and suggestions by Kidlington Development Watch that we will be building houses close to St Mary's Church (the nearest house will be more than 400m away).

In the January 2023 version of the Draft Local Plan ('version 3') consultation document, paragraph 7.13 acknowledged that:

> *'[Land North of the Moors] is a highly sustainable site, is well connected to a wide range of existing services and facilities, including public transport connectivity, but also makes limited contribution to the Green Belt purposes. Around one third of this site will be undeveloped to provide for new open space, create areas of nature-rich accessible green space in the 'nature recovery zone area' and provide a landscape edge to Kidlington which retains the areas relationship to the wider countryside and historic environment and acting as a buffer for the open countryside to the north, the Cherwell Valley and the setting of the listed buildings and Conservation Areas in the immediacy of the site. The area could also include a new Cricket Pitch, which would help to further minimise any impacts and protect the historic setting of the nearby church. The need for and suitability of the site for formal sports pitches will be further informed by the Council's emerging playing pitches and sports facilities strategy.'*

The Interim Sustainability Appraisal (SA) (August 2023) supporting the Draft Local Plan also acknowledges the potential to deliver green infrastructure in the eastern part of the site to address the historic environment (paragraphs 6.2.31 and 6.2.70) and suggests the delivery of a village green and/or a cricket pitch in this area to fulfil this purpose (paragraph 6.2.56).

With regard to the Green Belt, the draft Local Plan refers to an 'additional report' prepared by the Council following the 2017 Green Belt Study in the context of concluding that 'Exceptional Circumstances' ('EC') exist to justify changes to Green Belt boundaries including the removal of site LPR8A from the Green Belt. This is consistent with the findings of the 2017 study, which concluded that The Moors was the lowest performing part of the Green Belt around Kidlington. There is also the robust list of EC in the evidence presented by Cherwell to the Inspector at the Examination of the Local Plan (Part 1) Partial Review (summarised at paragraph 5.17 of the adopted review) which is equally applicable to the current CLPR; the most compelling point being the continued need to provide new homes, including local housing and much needed affordable homes. Kidlington is recognised by the Council as "*one of the most expensive places to buy a home in Cherwell*" yet "*one of [the] most sustainable areas" and clearly, the Council recognises the "need to weigh the importance of protecting the Green Belt with wider sustainability factors*" (Draft Local Plan paragraphs 6.7 and 6.11).

The Interim SA (August 2023) further underscores the sustainability of Kidlington and, in particular, site LPR8A in terms of its proximity to services to support new residential development: "*excellent potential to walk/cycle to key destinations, including; schools and other services/facilities in Kidlington; strategic employment areas at Kidlington/Oxford City Airport and Begbroke; and Oxford Parkway Station"* (paragraph 6.2.95). With respect to the consideration of site LPR8A as a Green Belt release, the Interim SA goes on to conclude that the site *"contributes to Green Belt purposes only to a limited extent, and the [SA] is supportive of growth here in terms of a range of sustainability objectives, such that a case can be built for the 'exceptional circumstances' necessary to justify Green Belt [release] through a local plan."* (paragraph 7.2.4).

Our conclusion from this quick review of the emerging policy (and evidence) is that The Moors is a sustainable site, in a sustainable location, in an area with a substantial local housing need.

The Vision and Proposed Development

The vision for The Moors is to create a sustainable new village neighbourhood, closely integrated with the existing village of Kidlington, whilst having its own distinct identity derived from the topography and landscape that frames the site. The proposed development incorporates a landscape-led masterplan, provision for cricket pitches and a pavilion on the eastern part of the site, landscape infrastructure including an orchard, a new village green, allotment space and areas of incidental open space throughout the site, new pedestrian and cycle routes, and access from The Moors to the south.

New connections will be created as part of the development with new routes and loops provided for recreation and play. Existing walking routes (many of which are informal) will be retained. The site will be designed to include a diverse series of green spaces and character areas connected to pedestrian and cycle routes. Character areas will reinforce a locally distinct sense of place and high quality public realm.

Transport and Access Considerations

The development is proposed to be served by two vehicular access points from The Moors: a point of access to the south-east comprising a new, raised table roundabout, and an access at the south-western end of the site. The existing third, informal (pedestrian) access onto The Moors between the two proposed vehicular accesses will be retained (as a footpath).

An Access Strategy (prepared by SLR) has been provided to CDC's Policy Team to support the CLPR and their consideration of site LPR8A as an allocation. The Strategy demonstrates that safe and secure vehicular access can be delivered from The Moors to serve the quantum of development proposed, and roads have been tracked to ensure that the road geometry is acceptable for cars, emergency and refuse vehicles to manoeuvre.

The strategy includes an analysis of local road collision data and finds no inherent issues with the proposed development, and also finds that adequate visibility splays can be achieved from The Moors in both access locations.

Open Space and Landscape Considerations

The proposed landscape and open space strategy for the site exceeds the requirement of 'general green space' and 'outdoor sports provision' as required by Cherwell's Developer Contributions SPD (2017) for a development of this scale: c.34,600 sqm of green space is incorporated into masterplan (the requirement is for 20,500 sqm) and c. 30,200 sqm of outdoor sports provision is provided in the form of cricket pitches (against a requirement of 8,400 sqm). The total amount of play space provision (LAP (6no), LEAP (1no) and NEAP (1no)) amounts to c.2000 sqm which is less than the amount required by the SPD for this scale of development, however this is outweighed by the significant overprovision in green space and sports provision on site and, where necessary and appropriate, can be compensated for elsewhere in the locality by contributing to the rejuvenation of open spaces, such as Park Hill.

Character and Design

Our Design Team, led by Professor Robert Adam, has developed a masterplan that predominantly takes its character influence from the setting of the Church of St Mary and the Church Street Conservation Area to the east, the countryside to the north and the local vernacular of the residential areas around the site. The vision is for the development to have a distinct 'community feel' which will be achieved through the creation of a major new open space with a cricket pavilion, two cricket pitches, a community orchard (close to the Church) and areas of incidental open space.

Benefits of the Proposal

We consider that the proposed development will deliver the following benefits to existing and future residents of Kidlington and Cherwell District:

- **New homes:** high-quality market and affordable housing to support Cherwell's housing land supply, involving just one landowner, and with the housebuilder, Harper Crewe, already appointed. The precise housing mix will be agreed in consultation with Cherwell and the Parish Council through the planning application process.
- **Active travel opportunities:** a sustainably located development with enhanced pedestrian and cycle links to existing local services and facilities.

- **Biodiversity enhancements:** the proposed development will deliver at least a 10% net gain in biodiversity on site with extensive tree planting, wildflower meadows, nature paths, specimen tree planting and the creation of a new fruit tree orchard. There is also an opportunity to assist the management of Thrupp Community Forest.
- **Environmental and sustainability benefits:** the creation of a development that complies with Cherwell's net zero carbon policies and which minimises embodied carbon emissions and integrates water conservation initiatives throughout the development.
- **Leisure provision:** new sports facilities in the form of cricket pitches to cater for a well-established local cricket club and provide a community benefit for the health and wellbeing of the current and future population. The masterplan also incorporates a 2.5km walking or running route and potential for a 5km loop as an additional Park Run opportunity for the local community.
- **Contributions to the local community:** including education, through a package to be discussed and agreed with local stakeholders and CDC, secured via a Section 106 Agreement as part of the planning application.

Summary

The proposed development of land north of The Moors has been planned as a landscape-led residential scheme; providing for cricket pitches and a pavilion on the eastern part of the site; landscape infrastructure including an orchard, a new village green, allotment space and areas of incidental open space throughout the site; new pedestrian and cycle routes; with two points of vehicular access from The Moors to the south.

We have developed a masterplan which supports the CLPR and draft site allocation (Reference LPR8A). We wish to work with the Parish Council to shape a development proposal that meets the local community's aspirations and needs. This will include public consultation after the local elections in May.

The aim is to have an outline planning application ready for submission to support our case at the Regulation 19 consultation stage of the CLPR, due later this year. We feel this will provide clarity, answer questions, and lead to an informed debate on how development at The Moors fits with the wider place-making and development strategy for Kidlington, as first envisaged by Alan Baxter Associates. We hope the Parish Council will embrace the change – and opportunities.

I trust that this letter provides sufficient detail to support our request for formal engagement with the Parish Council. Should you have any questions or require further information please do not hesitate to contact me.

I look forward to hearing from you, in due course.

Yours sincerely,

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