



## URGENT BUSINESS AND SUPPLEMENTARY INFORMATION

### Planning Committee

2 December 2021

Agenda Item Number	Page	Title	Officer Responsible	Reason Not Included with Original Agenda
8	(Pages 2 - 74)	Development Brief for Local Plan Partial Review Site PR9 - Land West of the A44  Development Brief Consultation Responses	Nathanael Stock, General Developments Team Leader	Details being reviewed and finalised
9	(Pages 75 - 136)	Development Brief for Local Plan Partial Review site PR7b – Land at Stratfield Farm  Development Brief Consultation Responses	Nathanael Stock, General Developments Team Leader	Details being reviewed and finalised

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By email only

## **Cherwell District Council Local Plan Partial Review Draft Development Briefs (Site PR7b: Land at Stratfield Farm, Kidlington & Site PR9: Land West of Yarnton)**

### **BBOWT Response – 22 September 2021**

#### **Introduction**

Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on the proposed content of Development Briefs for the following sites:

- PR7b Land at Stratfield Farm, Kidlington
- PR9 Land West of Yarnton

Established in 1959, BBOWT has now grown to be the largest and most influential voluntary conservation organisation in the region concerned with all aspects of nature conservation. BBOWT has over 50,000 members and 1,800 volunteers. We own or manage 87 nature reserves, totalling over 2,600 ha.

As a wildlife organisation, our comments will be restricted to matters associated with the protection and enhancement of biodiversity.

To avoid repetition and a very lengthy response we have written firstly overarching comments applicable to both Development Briefs and then site-specific comments relevant only to individual Development Briefs. In the event that the response is split up to be referred to by staff working on individual development briefs please ensure that the overarching comments are attached to each of the development brief comments.

We note that the layouts in the development briefs are indicative only and we reserve the right to comment on specific planning applications as they are brought forward. This includes reserving the right to object to future planning applications if we have concerns over impact on biodiversity, or the level of net gain in biodiversity.

#### **Overarching comments applicable to both Development Briefs**

The scale of development, with 660 homes proposed across the two sites, is such that it will inevitably have a major impact in terms of the additional number of people living in the area, and their vehicles and vehicle movements. We cover the likely impacts on wildlife and green infrastructure and make suggestions for what could be required of developers in relation to these.

## Scale of development

Paragraph 175 of the National Planning Policy Framework (NPPF 2021) states that *"Plans should... take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape-scale across local authority boundaries."* Paragraph 179 of NPPF 2021 states that *"To protect and enhance biodiversity, plans should... a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation, and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species,; and identify and pursue opportunities for securing measurable net gains for biodiversity."*

We believe the scale of development proposed should be matched by large-scale habitat restoration and enhancement. We note and welcome that within the developments proposed for the Development Briefs there are ambitions for creation of new nature reserves, community woodland and nature conservation areas. We are nevertheless greatly concerned as to the impacts of the developments on wildlife. If the Council is nevertheless minded to proceed with the allocation of these sites for development then there are a number of aspects which will need to be required of developers to minimise the impact on wildlife.

## Biodiversity Improvement and Management Plan

We welcome the requirement for a Biodiversity Impact Assessment be submitted as part of the planning application for both sites and a supporting Biodiversity Improvement and Management Plan and note that measures are to be incorporated into the development schemes to achieve a minimum of 10% biodiversity net gain.

## Light pollution

We note that PR7b requires measures "to minimise light spillage and noise levels on habitats and wildlife corridors including to maintain connectivity for nocturnal species in an east-west direction and the maintenance of a dark canal corridor." and PR9 requires appropriate lighting to minimise impact on wildlife.

We are concerned that these requirements may still result in significant light pollution arising from the developments, both static lighting as well as lights from vehicles. We think that there is an opportunity to consider lighting strategically to make this area an exemplar in terms of minimising light pollution, in terms of the type of lighting used, how much is used and where it is used, as well as design of routes to avoid light pollution into wildlife-rich areas of the sites, from fixed lights as well as vehicles, particularly where there are likely to be species of wildlife affected by light at night, e.g. bats and badgers. A key principle will be to keep dark corridors where bats are using lines of trees and hedgerows as flight paths. Lighting will have to be managed carefully to ensure it is of a low spill variety, a spectrum that minimises impacts on birds, bats and insects and directed into the development. We suggest that there should be conditions or covenants to control the type, power of and direction of security and outside lighting that can be installed on homes and other buildings.

### Access vs. undisturbed areas

In order to provide the substantial benefits for wildlife that will be needed to achieve a net gain in biodiversity that is focused primarily on site then there should not be public access across the entire area of the green infrastructure. Zoning, and a 'hierarchy' of access levels of the combination of all green areas should be carefully planned, including consideration of main paths/cycle routes (with an appreciation of the most obvious routes that people are likely to want to follow: 'desire lines'). There should be informal recreation along a network of paths and openly accessible spaces included within a mosaic of areas that are closed off by appropriate use of hedgerows, screens, fencing and ditches. Broad zones might help keep some larger restricted access nature conservation blocks 'quiet' rather than fragmenting areas too much. This would be simpler zoning for residents and visitors to understand and will allow wildlife to thrive and be observed from paths. The need to have some areas without direct public access is supported by a research report published by Natural England 'Is the management of Local Wildlife Sites affected by the urban fringe?' (NERR063) <http://publications.naturalengland.org.uk/publication/6134796821463040>

### Green infrastructure

We note that the sites will "deliver significant areas of new publicly accessible green infrastructure (GI) and habitat which form part of strategic GI corridors".

It is important that details are provided for how Green Infrastructure will be managed in the long-term. We consider long-term should mean for ever. Once developed it can be reasonably assumed that the developed land will have buildings on forever. Therefore, the GI should be retained forever and with an endowment fund to pay for its management forever.

### Proposals for wildlife management and maintenance

Our view is that the GI including habitats for wildlife should be managed in perpetuity (e.g. forever) and proposals should recognise this. Long-term management plans and effective, sensitive management (with regular reviews) will be needed for all sites - they all have green infrastructure and wildlife habitat. To ensure management lasts for as long as the built environment is built up (e.g. likely to be forever) then an endowment fund will be needed to ensure that management costs can be covered.

Ideally, there would be a funded officer-role to coordinate and oversee this. This could be alongside or sharing a role as a community engagement officer. This role could for example be delivered by an officer in an external organisation with appropriate experience (e.g. such as a member of Cherwell District Council's Biodiversity Partnership).

### Integration of wildlife features into the built environment

While we welcome the wording "The scheme is to include provision of in-built bird and bat boxes, wildlife connectivity between gardens and the provision of designated green walls and roofs where viable.", we think that this should be amended to: "A scheme for the provision of exemplary biodiversity in the built environment, including street trees with large canopies, wildflower road verges, wildlife connectivity between gardens, provision of designated green walls and roofs, and bird and bat boxes integrated into buildings ." The order is important and the current order suggests that bird and bat boxes are more important than wildlife connectivity. The reality is that the provision of natural wildlife habitat, including within the built environment, is much more valuable for wildlife than bird and bat boxes.



The scale of development proposed is such that each scheme should be exemplary in terms of integrating biodiversity features. The Wildlife Trusts have published 'Homes for people and Wildlife: How to build housing in a nature-friendly way' which sets out what a good, nature-rich housing development looks like. See: [https://www.wildlifetrusts.org/sites/default/files/2018-05/homes\\_for\\_people\\_and\\_wildlife\\_lr\\_-\\_spreads.pdf](https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf). According to this, 'All housing developments must result in:

- A measurable improvement for wild species and habitats, which means
  - Avoiding any loss or damage of wildlife sites
  - Designing in existing habitats
  - Creating new habitat
  - More than compensating for any habitat that is lost
- All residents having lasting access to nearby nature"

Research shows that green roofs can provide valuable habitats for wildlife (<https://livingroofs.org/biodiversity-and-wildlife/>). The extent of biodiversity will depend on the type of green roof installed. Sedum roofs benefit a limited range of invertebrates and provide foraging for pollinators when in flower. Ecologically designed extensive green roofs can provide good habitat for wildlife, but there are limitations in terms of replicating habitat at ground level due to shallow depth of soils and the drying effect of wind and sun. According to [www.livingroofs.org](http://www.livingroofs.org), a good green roof designed for biodiversity should include a varied substrate depth planted with a wide range of wildflowers suitable for dry meadows.

Wildlife connectivity between gardens can be achieved by allowing gaps in fencing and walls for hedgehogs and other small animals to roam, e.g. hedgehog streets in Kirtlington. This can be used to raise awareness of wildlife within the community.

Additional information on appropriate enhancements within the built environment can also be found in 'Biodiversity Positive: Eco-Towns Biodiversity Worksheet, produced by Town and Country Planning Association, Communities and Local Government, and Natural England', downloadable from: <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=2e0ffaf8-24b1-45fe-a02f-505a06d72ff2>

The table below (prepared by BBOWT) sets out features in developments to encourage biodiversity, and their associated benefits for people:

	Biodiversity benefits	Reduces urban heat island effect	Reduces air pollution	Reduces water run-off
<b>Houses and Gardens:</b>				
Gardens: Fruit trees in each back garden; Wildflower turf making up part of lawn in each garden; Log piles; Hedgerows making up at least one boundary; Garden walls with overwintering shelter for insects	✓	✓	✓	✓
Green roofs on garages and public buildings	✓	✓	✓	✓
Green walls	✓	✓	✓	✓
Built in bird boxes including swift bricks, swallow and house martin and garden birds.	✓			

Built in bat boxes, bricks and lofts – suitable for crevice dwellers and roof void dwellers.	✓			
<b><u>Street network and small green spaces:</u></b>				
Street trees – tree lined streets; woodland copses.	✓	✓	✓	✓
Wildflower rich road verges and green corners etc. with loggeries, hibernacula, bug hotels	✓	✓		✓
Climbing plants on fences and walls	✓	✓	✓	✓
Any shrubs chosen to maximise: berries for winter bird food; flowers for pollen and nectar.	✓			
SUDS schemes including biodiversity	✓	✓	✓	✓
<b><u>Green Spaces</u></b> (In addition to large scale habitat creation and management above):				
Wildflower edging / shrubs around sports pitches, play equipment, kick-about areas.	✓	✓		✓
Hedgerows and buffers: management for wildlife	✓	✓	✓	✓
Long grass / bare ground / rockeries / hibernacula for reptiles	✓	✓		✓
Clean-water wetlands / ponds / ditches with surrounding wildlife grass habitat for amphibians – can be part of SUDS and independent of SUDS.	✓	✓		✓
Woodland	✓	✓	✓	✓
Network of green and blue corridors without lighting	✓	✓	✓	✓
Allotments	✓	✓		✓

### Protection of habitats during construction through to long term management plans being in place and active

We would expect that wildlife-rich areas will be protected within developments, during construction and afterwards, during occupation. This will require long-term monitoring, and sensitive management to a plan, with developer-funded oversight.

We welcome the requirement to retain mature trees and manage these sensitively. Best practice measures (for example, as set out in 'BS 5837:2012 Trees in relation to design, demolition and construction. Recommendations') should be required during construction, including establishing Root Protection Areas. Buffer zones should be specified for hedgerows, particularly, but not exclusively, for old, rich hedgerows, as well as for any historic ditches.

### Protection of habitats and protected species

BBOWT would expect any planning applications which come forward on each site to be judged robustly against the biodiversity and green space elements of the 'Cherwell Local Plan 2011 – 2031 (Part1) Partial Review – Oxford's Unmet Housing Need (Sept 2020)' and the National Planning Policy Framework 2021, with reference in particular to the protection of:

- Special Areas of Conservation (SACs)
- Sites of Special Scientific Interest (SSSIs)
- Local Wildlife Sites (LWS) and proposed Local Wildlife Site (which have the same protection level)
- District Wildlife Sites (DWS) and proposed DWS
- Ancient woodland and other irreplaceable habitats
- Priority habitat (under Section 41 of the NERC Act)

- Legally protected and notable species Priority species (under Section 41 of the NERC Act)
- Wild bird habitat (as covered under paragraph 9A “Duties in relation to wild bird habitat” of the Conservation of Habitats and Species (Amendment) Regulations 2012)
- Lower Cherwell CTA
- Oxford Canal Conservation Area

The impact on protected species, designated sites and any Species and Habitats of Principal Importance for Conservation in England (as listed under Section 41 of NERC Act (2006)) that may be affected will need to be assessed in relation to any planning applications on these sites. A full suite of habitat and species surveys should be carried out. The species surveys should address priority and notable species in addition to protected species. Surveys should include breeding bird surveys and, on the arable land, surveys for arable plants.

The most recent ecological records should be sought from TVERC (Thames Valley Environmental Records Centre) in addition to ecological surveys being carried out in the right survey season.

#### Buffer zones, design and layout

Both sites are adjacent to District Wildlife Sites, and adjacent to or within the Lower Cherwell Conservation Target Area, and both are upstream of sensitive wildlife sites including a SAC and further LWS, DWS and SSSI. There should be clearly identified and specified buffer zones provided around these. Local Wildlife Sites should have a buffer zone of at least 50m. Hedgerows should have a buffer zone of at least 10m. Veteran trees should have a minimum buffer of 5m greater than their natural canopy area.

The aim should be that buffer zones are themselves biodiverse-rich priority habitat and certainly that these are planned and managed so as to contribute greatly to the diversity of habitats on site. We think that the place-making principles should include a requirement that development be arranged so that back gardens are not directly adjacent to LWS, DWS, SSSIs or any buffer zones. This will minimise the impacts of dumping of garden (and other waste) over fences and of the installation and use of private access gates.

#### Compensation for impact on farmland and other birds

DEFRA has provided guidance to competent authorities (including local authorities) on how to comply with the legal requirements of the [Conservation of Habitats and Species Regulations 2010](#) as amended in paragraph 9a of the [Conservation of Habitats and Species \(Amendment\) 2012 Regulations](#)). The guidance is available at: <https://www.gov.uk/guidance/providing-and-protecting-habitat-for-wild-birds>

We are aware of populations of skylark and fieldfare in the arable areas and it is highly likely that there will be populations of other farmland bird priority species. Off-site compensation should be provided for farmland birds where these are impacted (and on-site compensation where this is possible – substantial nature reserves areas with zoning to control public access would be needed in this case since many of these species are not suited to built-up areas or disturbance by people, dogs and cats) to ensure that populations are maintained in line with the above quoted legislation. Such compensation is commonly required within Cherwell District, as evidenced for example by the NW Bicester Eco-Town development.

## Conservation Target Areas

Conservation Target Areas (CTAs) identify some of the most important areas for wildlife conservation in Oxfordshire, where targeted conservation action will have the greatest benefit. Both sites adjoin or are close to the *Lower Cherwell Conservation Target Area*.

Their Oxfordshire Biodiversity Action Plan target habitats for creation should guide the habitats to be created on the proposed development sites. Oxfordshire Biodiversity Action Plan Targets associated with this CTA:

1. Lowland meadow – management, restoration and creation.
2. Floodplain grazing marsh – management, restoration and creation (for breeding waders in particular).
3. Lowland Fen (including swamp) – management and restoration.
4. Reedbed – management and creation.
5. Rivers – management and restoration (including management for water vole).

Note: “Management” implies both maintaining the quantity, and maintaining and improving the quality of existing BAP habitat and incorporates the following target definitions: “Maintaining extent” and “Achieving Condition”.

## Site-specific comments

### **Site-specific comments: PR7b - Land at Stratfield Farm, Kidlington**

120 homes are proposed for this site, on 5 hectares of a 10.5-hectare site. Part of the site adjoins the Lower Cherwell Conservation Target Area. It also includes a traditional protected orchard and adjoins both the Stratfield Brake District Wildlife Site and Oxford Canal, with the Meadows West of the Oxford Canal LWS.

We welcome the intention to, “provide a multi-functional green infrastructure network providing a range of ecosystem services:

- A Nature Conservation Area including habitat areas with limited public access, and publicly accessible informal open space
- A community orchard and associated community food growing garden
- Publicly accessible woodland / wetland
- Retained and enhanced hedgerow corridors and trees
- A public LAP/LEAP play area
- Drainage features and wetland
- Private gardens including the traditional orchard

However, we have concerns that increased public access to the ‘modern’ orchard is likely to result in a decline in condition of this priority habitat. It is estimated that since 1950 overall orchard area in

England has declined by 63% [Traditional Orchard Project in England: The creation of an inventory to support the UK Habitat Action Plan - NECR077 \(nepubprod.appspot.com\)](https://nepubprod.appspot.com/). We recommend the orchards should be carefully managed to prevent negative impacts to this priority habitat.

The stretch of canal immediately to the west and north of the site is a Local Key Area for water voles. The area is regularly surveyed and monitored by BBOWT's Water Vole Officer and there should be an aim to ensure suitable habitat at the canal edge and to take any opportunities that arise to enhance the habitat for water voles.

The existing biodiversity assets include two ponds and ditches / drains. The area to the west of the site is richest in biodiversity and should ideally be managed in such a way, for example by planting and path/desire line management, so as to reduce recreational impact on some parts of the site. Biodiversity could be greatly enhanced by conservation grazing in some areas. The aim should be to improve the western side of the site to be of sufficient biodiversity value to become an extension of the District Wildlife Site. This area of Kidlington with the existing bridge over the canal from the southwest corner of the DWS is already very popular with walkers including dog walkers but is heavily impacted by such access. The protected wet areas of the DWS are excellent, especially the section bordering this development site.

Efforts should be made to minimise the footprint of the new canal bridge, and the wider impacts during construction. We would recommend the advice of BBOWT's Water Vole Officer is followed.

#### **Site-specific comments: PR9 Land West of Yarnton**

540 dwellings are proposed for this site, built on 25 hectares of land within a 99-hectare site. The site is currently predominantly farmland: arable and grassland, including important ridge and furrow areas plus valuable wet grassland field, and double-hedged greenways with associated ditches, all valuable habitats. Begbroke Wood, an ancient woodland and Local Wildlife Site lies to the north-west. Frogwelldown Lane, a District Wildlife Site designated historic greenway and a public right of way forms the south west boundary of the site.

We welcome the intention to create, "An enhanced green infrastructure network..., providing connected wildlife corridors through the development site and enhancing wildlife connections with Begbroke Woodland, and along Frogwelldown Lane (which is a District Wildlife Site) and Dolton Lane."

Key features to include:

- informal parkland area on 24.8 hectares of land, that incorporates a new Local Nature Reserve
- 7.8 hectares of community woodland
- 39.2 hectares retained for agricultural use
- connected green corridors including the retention and enhancement of existing hedgerow corridors and trees
- habitat buffer to Begbroke ancient woodland
- public play spaces
- 0.49 hectares of community allotments
- retention of drainage features and new sustainable drainage features
- private gardens"

We would welcome further discussions on the potential for wildlife habitat creation within the areas of retained green space. We consider that there is great potential here for the creation of a large-scale nature reserve within this area, with zoning so that public access is provided in some areas

but managed in such a way that some areas do not have public access – see earlier section on this in the generic part of our response for more details on this.

Recommended habitats within the nature reserve include species-rich grassland, including wet grassland if applicable, ponds and scrapes, hedgerows, scrub and woodland.

Aerial photography and GIS suggest that the land is currently predominantly arable farmland, with some grassland, bounded by hedgerows and lines of trees. The Ecology Study identifies the grassland as semi-improved / improved in nature with some remnant ridge and furrow, broad-leaved woodland belts associated with historic rights of way and some potential veteran trees.

The mature and veteran trees present are considered to be of high ecological value and veteran trees are considered irreplaceable under the NPPF. In our opinion there are some great trees, including an excellent pollarded oak in the hedge line running eastwards from Frogwelldown Lane towards the build area, high on the hill. All mature and veteran trees should be retained and provided with above minimum buffer zone, as should all hedgerows. There are gaps in the hedgerow either side of the oak. These should be reinstated to avoid trampling, and for connectivity, unless there was some halo clearance, although it is unlikely a low hedge would encroach. We recommend that pathways are kept well away from large trees such as this oak, with wide buffer zones, both for habitat, and so that any concerns about aging oaks near footpaths do not lead to early crown reduction or felling.

While we welcome proposals for community woodland which can provide opportunities for volunteers and visitors to learn about the local environment and conservation, we have some concerns, subject to further work, which we would like to discuss about the exact area proposed for community woodland since it includes ridge and furrow in that area. Ridge and furrow is often associated with species-rich habitat and good soil ecology. It is rare in the district and much has been lost. In addition to many of the other proposed locations for planting we would welcome more tree planting alongside the existing exterior hedgeways, including Frogwelldown.

We would suggest that if some of the wildlife habitat could be near the school then it could be available, if appropriate and if the school desired, for wildlife education.

In addition to protection of trees and hedgerows should be protection of ditches as valuable, old habitats in their own right and linked to the greenways: Frogwelldown and Doulton. Bridges should be built as specific structured access points to reduce ad hoc pathways across the ditches.

We would recommend that all hedgeways be enhanced, particularly linking the greenways to Begbroke Wood and to new woodland strips / blocks wherever they are planted.

We welcome the proposed Local Nature Reserve linked to William Fletcher Primary School. The Local Nature Reserve could be an example of ex-arable reversion with wild flower meadow and grassland for ground-nesting birds.

We are aware of skylarks in this area. This should be considered in the zoning of the open access area as skylarks are vulnerable to disturbance by people and dogs.

We consider it is very important to conserve and enhance the condition of Frogwelldown Lane District Wildlife Site. It has the potential for future consideration as a LWS as it is already of good quality, but currently isolated from similar habitat. This is an opportunity to enhance this DWS - especially with extended good quality linking habitat to the north to link with woodland. But there is

in balance the potential for damage from increased right of way use and disturbance. We would potentially like to suggest an all-weather, accessible route to the east of Frogwelldown Lane right of way in parallel, with a buffer; community woodland planting to protect the DWS from some traffic, and also providing an accessible route while keeping the DWS central pathway open, as it needs to be for its habitats.

We would recommend that gaps should be filled to minimise meanderings through the greenway sides and that maintained dog mess waste bins are provided at intervals, including the start, end and formal access points. We would recommend there be bridge and ditch crossing points to avoid damaging ditchlines.

We are similarly concerned about damage to the adjoining Begbroke Wood LWS, including through highly likely recreational impacts (especially with its spring flower attractions, and being central to a likely highly popular circular walk route near the new build area), plus cat encroachment and predation. This clear potential for damage should be actively minimized through funding towards education/engagement activities providing information about the sensitivity of such sites as well as offering attractive, easily accessible, woodland elsewhere. This may in part be managed through careful design and management of the community woodland areas and the open access land. We refer to our comments above. We are concerned by the ecological consultancy report's suggestion that local residents are much more likely to walk at Blenheim Palace than on the local area's paths and green spaces. We consider it is highly likely that there would be significant increase in the use of local paths and green spaces.

Thank you again for inviting BBOWT to submit comments to inform the development briefs. Please do get in touch if you have any queries.



Historic England

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Date: 22/09/2021

Dear Sir or Madam

**Local Plan Partial Review Draft Development Briefs (Site PR7b: Land at Stratfield Farm, Kidlington and Site PR9: Land West of Yarnton)**

Thank you for inviting Historic England to comment on the above document. On the basis of the information currently available, we do not wish to offer any comments at this stage. We may wish to comment on proposals later in the planning process.

Yours sincerely

**Edward Winter**

Historic Environment Planning Adviser



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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

Page 12





**From:** Jai Sidhu [REDACTED]  
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**Subject:** Draft Development Brief (Site PR9: Land West of Yarnton) - Representations

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

**Local Plan Partial Review Draft Development Brief (Site PR9: Land West of Yarnton)**

Please find attached a representation letter, submitted on behalf of our client, Merton College, in respect of the above for your consideration and review.

I would be grateful if you could confirm receipt of this e-mail.

Please do not hesitate to contact me should you have any queries.

Kind regards

Jai

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21 September 2021

**Our ref: AFG/RJD/JSID/G6492**

Dear Sir/Madam

**PR9 Development Brief Consultation  
Local Plan Partial Review Draft Development Briefs - Site PR9: Land West of Yarnton**

We write on behalf of our client, Merton College Oxford, in order to submit a representation in respect of the draft Development Brief - Site PR9: Land West of Yarnton.

Merton College is the sole owner of PR9 and has had a constructive dialogue with the Council throughout preparation of the Development Brief since 2018 and therefore supports most elements of the document. However, there are also specific aspects of the draft brief which are at variance with our own thinking, and which we would like to bring to your attention as follows:

**Woodland Areas**

While the quantum of the new community woodland area is agreed (7.8 ha) we note that the brief proposes a single area of woodland, north of the residential area. By contrast, we are proposing two woodland areas, rather than one. Whilst they would be physically close, they would perform slightly separate functions.

The first, to the north, would act as a buffer between the site and Begbroke. Since it would not incorporate all the existing cropped agricultural land, it would maintain greater openness in comparison to the extent of woodland as proposed in the brief. Consequently, we consider that providing less woodland in this area would be more consistent with green belt policy as well as providing (with the adjacent allotments) a more effective and varied buffer between the development parcels and the wider locality.

The second area would be located to north-west, partially in the area currently identified by the draft Brief as a 'Woodland Habitat Buffer' within the Green Infrastructure plan on page 48 (Figure 18). It would be adjacent to and contiguous with the southern and eastern boundary of Begbroke Wood (which comprises some 14.5ha of Ancient Woodland, plus c. 3.5ha of secondary woodland). The new planting here would substantially increase the overall size of the woodland block, and in combination with a proposed conservation margin would provide a significant enhancement to the woodland edge habitat.

For these reasons, we consider that the College's proposed disposition of woodland area results in significant additional environmental benefits in comparison to the draft brief.

It is also acknowledged that the College will provide public access to both areas, although the full extent and details of these access arrangements would require discussion as part of any s106 agreement.

### **Meadowland**

The area of retained green belt immediately west of the development area (currently intensively farmed agricultural land) is proposed to be repurposed as a working meadow with grazing animals, in contrast to its proposed use under the brief as 'new green space / park'.

As meadowland, it will be a higher value habitat, managed to maximise botanical interest as appropriate. Visually, it will provide a softer transition between the more manicured open spaces within the development and the retained agricultural land further to the west. It will also have a pastoral character, entirely consistent with its location in the retained green belt. Publicly accessible grass paths will meander through this area, with the precise access arrangements to be agreed under any s.106 agreement.

### **Elderly/Extra Care Provision**

While the College's emerging proposal is largely in line with the draft Development Brief there is one proposed additional use, namely up to 9,000 sqm GEA of elderly/extra care floorspace (Use Class C2) to be located close to the vehicular entrance on the eastern boundary, accessed via the Rutten Lane / A44 roundabout.

Although this use is not supported by Policy PR9, it is in line with Local Plan: Part 1 – Policy BSC 4. Furthermore, the provision of elderly/extra care does not limit the proposed quantum of C3 dwellings, which is still expected to be 540 dwellings in line with Policy PR9.

We also understand that Oxfordshire County Council is interested in the matter of elderly/extra care provision and their officers have confirmed a willingness to work further with the College and Applicant and District Council in identifying the appropriate provision for older people within the development.

If you have any queries, please do not hesitate to contact Robert Davies (0207 333 6207) or Jai Sidhu (0203 486 3666) of this office.

Yours faithfully



### **Gerald Eve LLP**

rdavies@geraldeve.com  
Direct tel. 020 7333 6207  
Mobile +44 (0)7944 584 053

**From:** Blake, Patrick <Patrick.Blake@highwaysengland.co.uk>  
**Sent:** 20 September 2021 15:54  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Cc:** Planning SE <planningse@highwaysengland.co.uk>; Ginn, Beata  
<Beata.Ginn@highwaysengland.co.uk>; Colclough, [REDACTED]  
[REDACTED]

**Subject:** FW: #14119 FW: Development Briefs - Aug 2021

[REDACTED]  
[REDACTED]  
**Our Reference:** 14119

**FAO:** Cherwell District Council

**#14119 Development Briefs - PR7b: Land at Stratfield Farm and PR9: Land West of Yarton**

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

It is noted the development (PR7b) is located within the settlement of Kidlington, the series of development briefs are being brought forward as part of the Cherwell Local Plan Partial Review. Specifically the site is referenced PR7b: Land at Stratfield Farm, the nearest access point to the SRN is the junction with the roundabout junction with the A34/A44, approximately two kilometres to the south of Kidlington. The development brief identifies site PR7b shall deliver 120 homes on five hectares of land, of which 50% of shall be affordable housing. No transport specifics with regards to operational assessment are provided in the brief as the detail is currently high level. With respect to access, the sites primary access point to the SRN shall via the roundabout junction of the A34/A44. This location also serves the Peartree road service area and the Pear Tree Park & Ride site.

PR9, Land West of Yarton, is located to the west and north of Yarnton and south of Begbroke, adjacent to the A4. Policy PR9 of the LPPR sets out the policy requirements for the site which include 540 dwellings (net) on approximately 25 hectares of land with 50% affordable housing, alongside additional ancillary landuses.

In respect to both sites we would expect a robust transport assessment detailing the impact the development has on the SRN. This would include a baseline traffic survey of the SRN, including the A34/A44 roundabout junction, a trip generation and distribution review using industry best practices, growth scenarios covering a ten year period and if appropriate a junction capacity assessment identifying whether the need for mitigation is required as a result of the residual cumulative impacts. We would also expect all site allocations in the area to be included in the assessment to

understand the cumulative impact of future growth. Also additional developments may need to be included and this should be discussed with the local planning authority.

We welcome being included in any further discussions as to the transport specifics of this development.

Kind Regards

**Patrick Blake, Area 3 Spatial Planning Manager**

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

**Tel:** +44 (0) 300 4701043 | **Mobile:** + 44 (0) 7825 024024

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[info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)

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Consider the environment. Please don't print this e-mail unless you really need to.

To who it may concern.

Apologies for being late with my comments on the consultation on the development of PR9 Yarnton.

I had not realised the cut off date of 22/09 but hopefully being submitted on the 25/09 may still be viable.

Looking at the consultations - the may concerns I have are.

1. The proposed access to the site off Rutten Lane - this is not needed as their is access off the A44. It has the potential to create a "rat run" through the village or the Garth at peak time or traffic disruption on the A44. As such this should be removed.
2. There is increased chance of high traffic on Rutten lane due to the development past the school - The developer should pay for speed decrease solutions under a Section 106 agreement on Rutten lane - such as cameras and speed bumps.
3. There is an increased change of water surface run off - increasing the flood risk to existing properties in yarnton. The developer should pay for an independent flood risk assessment chosen by the parish council. Their recommendations in terms of improved piping and pumping again should be paid for under a a Section 106 agreement.
4. The improvements to non-vehicle transport infrastructure to support such as development is unsatisfactory. Improvements to NCR 5 / bike route 5 - the bike route than runs next to the canal is welcomed - However the cycle/footbath alongside the A44 all the way from Yarnton up to Pear Tree roundabout which is the most direct route to North Oxford and the Universities is unsatisfactory (narrow in places and poor surface). This is the route which is becoming increasingly busy and is not good enough to take the increased number of potential users. Underr a section 106 agreement - there should be a wider foot/cycle path and possibly on both sides allowing a satisfactory non vehicle commute to Oxford.  
  
ideal - solar powered led lights in the lanes at night for the bike lane would improve safety.
5. Any increase in public transport should be directed along the A44 and not through the village/Rutten Lane.
6. Both medical and Schooling will be pressured - I note improvements in the plan to these which is welcome - again an audit to ensure that the capacity increases are satisfactory should be provided.
7. A noise pollution assessment of London Oxford Airport to be required as the new development is under current agree flight paths and likely to be affected. Changes to London Airports operating hours to be made if needed.

Of course ideally this would not go ahead as its killing off the green land around Oxford to the detriment of all... but if it is to go ahead they key aspects are ensuring that it actually improves the welfare of those already residing in the area

Kind regards

Jonathan Young

To whom it may concern,

I am very disappointed to hear about the outcome in the court case in relation to this development (PR9) and complete disregard to supposedly protected greenbelt land. I still dispute the assessment methods used in calculating the 'unmet housing need' in Oxford, and the fact that other brown sites have not been considered. I am still very concerned about the increase pressure this development will put on the transport infrastructure into Oxford, as well as destroying the character of Yarnton and our sense of identity.

However, given that these concerns have so far been ignored, I now wish to take this opportunity to have my views listened to on the proposed Draft Development Plan for PR9.

I live at 127 Rutten Lane with my husband and two young children, where our garden backs on to this proposed development. As the attached image shows, this development to going to totally change our view and feeling of being connected to the countryside. We absolutely love living next to this field and it was a key factor when deciding to buy our house 5 years ago. To think we will be losing this is very upsetting.

However, if this development is unavoidable, I wish to make the following 3 main requests:

1. Please provide a path from the rear of the properties along the western edge of Rutten Lane, to provide easy, direct access to the green corridor so that we can continue to enjoy the countryside without having to make a significant walk to an alternative access point. This simple addition to the plan would make a huge difference to us.
2. The plan highlights that the noise from the school playing field is seen as an issue to houses on Rutten Lane. The mitigation for this is some sort of acoustic barrier. I am assuming this will be some sort of ugly high fence. However, it appears that noise pollution for the new houses on the development are being dealt with by providing green spaces such as the allotments and the green corridor. It seems to be very unfair and unacceptable that no such allowances seem to be in place for our existing houses. Please provide us with a similar green space separating the rear of the existing properties/gardens from the school playing fields to mitigate any sound pollution, not an unsightly barrier. At the very least, we would prefer to have hedging instead of a large fence.
3. I wish to request that compensation is made to residents where our view is being taken away from us. This is very likely to reduce the value of our homes. This will also allow us make any changes to our gardens to compensate for this development (e.g. adding additional trees or changing fences to shield the view of the new development.)

Additionally I would like to request:

1. Please provide confirmation that flood risks are full determined before plans are progressed further. Section 6.5.4 states that this has not yet happened, and considering the issues our village have experience with flooding so far, this is unacceptable.
2. Please ensure that construction traffic assesses the site via the A44 and not Cassington road and Rutten Lane. Rutten Lane is already a very busy road with a primary school on it.

Thank you for consulting with us regarding these plans, I sincerely hope that our views are taken seriously, as this is something that massively affects where we live. I would be happy to talk in person about anything I have raised, and also happy if anyone would like to see the plot from the perspective of our garden.

Kind regards,



Michelle Mason





**County Hall  
New Road  
Oxford  
OX1 1ND**

Planning Policy  
Cherwell District Council

**Corporate Director: Bill Cotton  
Environment and Place**

**22 September 2021**

By email:  
developmentbrief@cherwell-dc.gov.uk

Dear Planning Policy

**Public Consultation on Local Plan Partial Review Draft Development Briefs  
(Site PR9: Land West of Yarnton)  
Closing date 22<sup>nd</sup> September 2021**

Oxfordshire County Council welcomes the opportunity to review the draft development brief for PR9, Land West of Yarnton. Comments are attached as Appendix 1 to this letter.

The County Council is actively engaged on an ongoing basis in respect of the proposals for development on this strategic site allocated under Policy PR9. We have previously had an opportunity to comment on a draft development brief and appreciate that some of our consultative comments have been taken on board in the preparation of this document dated July 2021.

Cherwell District Council has decided to consult on only two draft development briefs at this time (PR9 and PR7b) and other development briefs are not yet ready for this stage. The inter-relationship between the Yarnton site (PR9) and Begbroke site (PR8) is crucial, for example in relation to access points and provision of schooling, and our comments are made in the absence of a development brief for PR8.

Yours faithfully,



Lynette Hughes  
Principal Planner

[www.oxfordshire.gov.uk](http://www.oxfordshire.gov.uk)

## **Appendix 1 – County Council Comments on PR9 Draft Development Brief - Land West of Yarnton**

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### **Strategic Planning**

We acknowledge that Merton College, as landowner, has undertaken some public consultation on its proposals and established a website<sup>1</sup>. The applicant's proposals differ from Policy PR9 and this development brief, most particularly in the proposal for a care home in addition to the other uses on the site.

Specialist Housing Policy BSC 4 of the adopted Cherwell Local Plan Part 1 (adopted July 2015) requires housing sites such as this to 'provide a minimum of 45 self-contained extra care dwellings as part of the overall mix' and includes some flexibility on the requirement. Policy BSC 4 envisages only Land Use Class C3 uses, not C2 and therefore does not relate to care homes. The development brief should be amended to make it clear what provision for specialist housing is expected on this site.

Para 1.2 We are fully supportive of the purpose of development briefs to guide future site development. It is not clear why the District Council has chosen that the development briefs will not have the status of a Supplementary Planning Document, which would give them a stronger status.

General and 7.0 The development brief should clearly set out how enhancement and beneficial use of the Green Belt land within the allocation will be achieved or conditioned upon an application for development on any or all of the 25ha expected to be used for residential development.

### **Cllr Ian Middleton**

Oxfordshire County Council Member for Kidlington South

There is a need for additional pedestrian crossing places over the A44 between the PR9 and PR8 sites. Begbroke Parish Council has been lobbying for a controlled crossing and their input should be sought. This is a dangerous area for pedestrians, and the lack of crossings will cause difficulties for those accessing public transport or moving between Yarnton and Begbroke. Pedestrian and cycle crossings will support active travel in the area, providing connections to cycle paths on both sides of the dual carriageway. Crossings could be funded through developer contributions.

I would also draw your attention to the submission of Yarnton Flood Defence Group to this consultation as I echo their concerns.

---

<sup>1</sup> <https://www.pr9-consultation.co.uk/>

## **Transport Development Control**

The draft development brief covers a range of issues that need to be addressed from a design perspective in relation to roads, cycle and pedestrian paths and car parking.

As this is a site close to Oxford, we expect that car parking provision will be less than on sites further from Oxford. We support the reference to advocating the provision of unallocated on-street parking.

Developer contributions will be sought towards the delivery of various on-site measures and off-site highways mitigation schemes, including improvements to pedestrian and cycle routes and crossing facilities.

The County Council has a range of existing documents which could be referred to such as our cycling and walking design standards and active healthy travel strategy<sup>2</sup>. In addition, the County Council's new Street Design Guide is being reported to the County Council's Cabinet on 21/09/21<sup>3</sup>.

## **Public Transport**

Para 4.2.5 Sixth bullet point refers to "the proposed Park and Ride facility located off Campsfield Road" – should this be "Upper Campsfield Road"?

We request a new bullet point: "Opportunity for new southbound bus stop on Rutten Lane near Aysgarth Road" (as shown in Figure 15).

Para 6.4.9 Alter final paragraph to "There will be a requirement for contributions towards the off-site A44 southbound bus lane enhancement, and for increased service provision. These are to be agreed with OCC."

## **Infrastructure Locality (Cherwell & West)**

There is no mention of adhering to the Oxfordshire Electric Vehicle Infrastructure Strategy for the residential dwellings. It is important that the minimum provisions are met from and also that consideration is given towards scalability with future demand.

The designing of cycling routes should be accommodated with sufficient wayfinding to support the "less car-centric" movements and modal shift.

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<sup>2</sup> <https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-and-healthy-travel>

<sup>3</sup> <https://mycouncil.oxfordshire.gov.uk/ieListDocuments.aspx?CId=115&MId=6380>

## **Lead Local Flood Authority**

Although there are a number of maps which include existing mapped flood risk information publicly available, there is limited information provided on the local flood issues that have been raised and we believe that should be included within the Development Brief.

Whilst the SuDS requirements are mentioned throughout the document, apart from a short section on blue infrastructure, there is no specific section on flood risk.

In line with paragraphs 160 and 161 of the NPPF, we will expect a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impacts of climate change by “safeguarding land from development that is required, or likely to be required, for current or future flood management” and “using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding”.

Part of section 6.5.4 ‘Blue Infrastructure’ is too specific for a high level design brief. The locations of drainage attenuation features must be agreed with the Lead Local Flood Authority (LLFA) following a detailed assessment of the existing hydrology and flood risk issues. As this is a major development, the location of any drainage features will need to be agreed with the LLFA as well as the CDC flood officer, regarding any changes in land drainage management. Please amend as indicated with the strikethrough and red:

‘It is expected that the site will drain towards the eastern part of the site, reflecting the topography and existing outfalls on the eastern boundary, with drainage attenuation features ~~broadly in the locations indicated on Fig.18 and~~ to be agreed in detail with the **LLFA and** CDC Flood Officer, as an integral part of the overall landscape strategy for the site.’

## **Property and Estates (OCC as Landowner)**

This document sets out the details for the redevelopment of PR9. OCC does not own any land within the site boundaries but does own the William Fletcher Primary School site adjacent to the south-east corner boundary (notwithstanding any Highways land).

## **Property - Schools**

Para 6.4.5 Please amend as indicated by the changes in red: ‘A new **pedestrian** footpath from Rutten Lane to the Dolton Lane green corridor, immediately to the south of the school and nursing home is to be provided (subject to survey and agreement with the pre-school, nursing home and the school **and agreement on how this will be managed in perpetuity**).’

Para 6.4.3 Please amend as indicated by the changes in red: ‘**One access point** to Rutten Lane: adjacent to the Medical Practice. **To** the south of the primary school and

nursing home a pedestrian footpath should be provided (subject to survey and agreement with the pre-school, school and nursing home and agreement on how this will be managed in perpetuity). The accesses from Rutten Lane to the school will be part of the school site and secured as required for safeguarding purposes.'

6.5.4 Please amend as indicated by the changes in red: 'Attenuation ponds should not be placed within the area identified for school expansion. Runoff from the hillside to the west will need to be attenuated before it reaches both the new nursing home access road and the school boundary. The LLFA recommends the applicant places the attenuation for the school site outside the immediate school boundary. This should be in the form of an on the surface attenuation basin as opposed to underground storage. The LLFA feels this would provide bio-diversity benefits, cost savings and a reduced maintenance liability.'

6.6 Please amend as indicated by the changes in red: 'To ensure that the school site is in the optimal location and layout for satisfactory education provision, it shall comply with the County Council's design requirements, processes, interrogations and checklists as described within the following documents:'

'The existing vehicular access from Rutten Lane to the school and nursing home is to be retained as a vehicular route, to access the school site only, that will be secure and that will not cross the children's pedestrian routes within the school site. NB All subject to agreement with the nursing home, see below.'

The vehicular access and pedestrian routes into the school and nursing home sites are to be shallower than 1:21 from the drop off area into the school and nursing home access and along all routes to the school site.

'To enable an integrated and secure primary school site, the existing vehicle and pedestrian access to Yarnton Residential Nursing Home from Rutten Lane is to be rerouted via the site. This route, where it runs alongside the playing fields is to be a private access for the nursing home and will be managed and maintained by the nursing home (subject to agreement with the nursing home).'

'A new pedestrian footpath between the Nursing Home and Rutten Lane is to be created along the southern boundary of the school (subject to survey and agreement with the pre-school, nursing home and school and agreement on how this will be managed in perpetuity).'

## **Public Health**

1.2.1 Please change this bullet to read: 'to raise the standard of design and to create exemplary places which are functional, beautiful, promote health and wellbeing and which engender a sense of community'

4.2.1 We agree that it is vital to maintain cohesion and a sympathetic design in relation to the existing surrounding villages, with a focus on green spaces, limitations on noise and air pollution etc. It is important to ensure effective connectivity between the

development and existing community that supports active travel and reduces severance.

5.1 We welcome reference to access to the countryside in the vision. Development of this scale, and considering the various other development going on in the area, needs to ensure adequate maintenance and enhancement of green spaces (both formal and informal). Improved sports facilities at south east Kidlington need to be easily accessible on foot or by bike.

6.2 The Draft Oxfordshire Joint Health and Wellbeing Strategy has now been formally approved by the Future Oxfordshire Partnership and is called 'The Oxfordshire Strategic Vision'<sup>4</sup>.

In order to ensure that the design of major developments maximises the opportunity to promote health and wellbeing, the Future Oxfordshire Partnership has developed and approved the use of a Health Impact Assessment toolkit<sup>5</sup> to assess the health impacts of significant developments.

Given the size of this development, the Council would expect a Health Impact Assessment to be conducted of this site to ensure that it maximises opportunities for a health enabling environment, in accordance with government's advice and national best practice.

6.3.1. Please amend as indicated by the changes in red: 'Green infrastructure within the site including hedgerow and drainage corridors is to be designed as a connective element which supports the movement of wildlife and encourages walking and cycling, **biodiversity** and community use.'

6.3.2 Please add this text in red: '**Cycle parking is to be easily accessible, ideally at house frontages, to promote active travel.**'

6.3.3 Please add this text in red: 'On plot parking in front of properties is to be avoided. **Easily accessible cycle parking is to be provided.**'

6.4.5 Reference should be made to the fact that cycling routes should support connectivity.

6.4.7 Please amend so that this and all development briefs mention the need to provide for EV charging on site.

## **Archaeology**

6.7 Please amend as indicated by the changes in red: 'Planning applications for development on the site will need to include **a desk based assessment, incorporating**

---

<sup>4</sup> <https://www.oxfordshiregrowthboard.org/projects/oxfordshire-strategic-vision/>.

<sup>5</sup> <https://www.oxfordshiregrowthboard.org/wp-content/uploads/2021/01/210126-Oxon-HIA-Toolkit-FINAL.pdf>

the results of an archaeological evaluation, to assess the significance of any archaeological deposits on the site.'

'An archaeological mitigation strategy, including provision for the preservation in situ of any significant archaeological deposits, will need to be submitted along with any planning application for the site.'

**From:** Heather Pugh <HPugh@DavidLock.com>

**Sent:** 21 September 2021 17:33

**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>

**Cc:** Nathanael Stock <Nathanael.Stock@Cherwell-DC.gov.uk>; Adam Davies <ADavies@davidlock.com>; Sebastian Balcombe <Sebastian@oud.co.uk>; Tom Clarke <TomClarke@oud.co.uk>; Sensecall, Steven <Steven.Sensecall@carterjonas.co.uk>; Iain Macsween <imacsween@hallamland.co.uk>

**Subject:** PR7b and PR9 - Development Brief Response from OUD/Hallam Land

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

Please find attached a joint response from OUD/Hallam Land to the draft development briefs for PR7b and PR9. I would be grateful if you could confirm receipt, and lodge a copy of this response in respect of each of the two Development Briefs in question.

We would be happy to discuss any of the points raised in more detail over the phone or via Teams if this would be useful.

Yours sincerely

**Heather Pugh**

Partner



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Planning Policy  
Conservation and Design Cherwell District Council  
Bodicote House  
Bodicote, Banbury  
Oxfordshire,  
OX15 4AA

21 September 2021

Our ref: TRI003

By email to:  
[DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk)

Dear Sir/Madam,

**Cherwell Local Plan Partial Review Draft Development Briefs:**

**Site PR7b: Land at Stratfield Farm (Kidlington) & Site PR9: Land West of Yarnton**

We write on behalf of Oxford University Development Ltd (OUD), development managers on behalf of the University of Oxford, Merton College and The Smith Trust, who are known collectively as the "Tripartite" and Hallam Land. Together, the Tripartite and Hallam Land own and control the vast majority of land (95% of the site allocated as a "new urban neighbourhood" by Policy PR8 of the *Cherwell Local Plan 2011-2031 Partial Review – Oxford's Unmet Housing Need* (CLPPR). David Lock Associates is commissioned as planning consultants to represent OUD on behalf of the Tripartite and promote its interests in relation to future development at Brobroke and Carter Jonas has a similar instruction from Hallam Land.

OUD and Hallam Land support the joined-up and holistic approach proposed for the delivery of the CLPPR sites as outlined within the Draft Development Briefs for Site PR7b Land at Stratfield Farm (Kidlington) and Site PR9 Land West of Yarnton.

Given the interrelationships between the Partial Review sites, subject to the series of Development Briefs currently being prepared, it is imperative that the planning submissions, and planning permissions, are prepared, structured and consented in a way that ensures compatible and complementary development in terms of both design and delivery.

We support the inclusion of Section 7.2 of the Draft Development Briefs, which references the intention to secure comprehensive development within each of the PR sites. Our view is however, that this section should also reference the need to secure the co-ordination of design or delivery elements that are common across the PR sites.

Appendix 4 of the adopted CLPPR sets out a schedule of the anticipated infrastructure needs associated with allocated development sites. It is clear that a number of these are 'common infrastructure' items, intended to serve all of the PR sites.

In some instances, this common infrastructure will be delivered through proportionate financial contributions (with each site required to make its own financial contribution to CDC/OCC, for example). However, in other instances, land or infrastructure is to be provided within one PR site, but on the basis that that land or infrastructure will meet the needs of the other PR development sites (or indeed, serve a wider population).

In terms of supporting the wider aims of the CLPPR spatial strategy and informing the submission and determination of planning applications, and if the Development Briefs are to ensure effective design and delivery of common social and physical infrastructure, we consider that the wording of the PR Briefs around this issue needs to be strengthened considerably.

This can be addressed by re-wording Section 7.2 in two respects. First, to ensure that development across the CLPPR sites in respect of common infrastructure, connections and networks is well designed and can be effectively delivered, we recommend the addition of two new bullets after the first bullet of 7.2, to read:

- ***Where land, services or infrastructure within the site is designed to serve wider CLPPR developments, planning applications will demonstrate how this can be co-ordinated and delivered effectively through site masterplanning and S106 agreements.***
- ***Any infrastructure links or open space networks that are common to more than one CLPPR development site will be constructed to the site boundary and access provided so as to avoid a 'ransom' position being established which prejudices effective delivery of this common infrastructure.***

Second, in respect of Heads of Terms for development contributions, it would be helpful to provide further clarity in the Briefs on the manner in which shared infrastructure across the CLPPR strategic housing sites is to be delivered. This would also assist the Council, applicants and other interested parties and stakeholders when submitting and considering applications on individual PR sites.

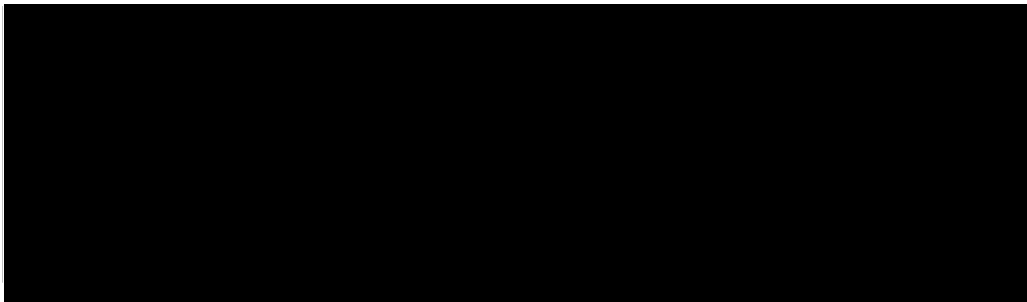
We therefore suggest that two additional bullets are added after bullet three of section 7.2, and that the current bullet four is amended to read (our additions in bold type):

- ***Obligations are to be secured via a planning agreement, entered into under section 106 of the Town and Country Planning Act 1990. Consistent with national planning policy and practice guidance and the Cherwell Developer Contributions SPD (February 2018), the allocation of S106 costs required to serve the development is to be agreed with the applicant to secure appropriate financial contributions and/or in-kind works under a direct delivery obligation. Subject to statutory tests, these shall provide for "on site" and/or "offsite" facilities and infrastructure as required.***
- ***In preparing a draft Head of Terms, ~~it is recommended that proposals~~ applicants should have regard to matters including the LPPR Infrastructure schedule. Where facilities and infrastructure are required to be provided on land outside the site, these are to be secured by way of proportionate planning obligations and/or through the pooling of contributions as appropriate, in accordance with the Community Infrastructure Levy Regulations 2010, as amended.***
- ***It is recommended that pre-application discussions are undertaken with Cherwell District Council ahead of submitting the draft Head of Terms for developer contributions. ~~In preparing a draft Head of Terms, it is recommended that proposals have regard to matters including the LPPR Infrastructure schedule and should consider in discussions with infrastructure providers whether infrastructure issues will require the phasing of development to ensure that necessary services, facilities or apparatus are provided in advance if needed.~~***

We suggest that the inclusion of the above or similar wording (identical text to be inserted within each of the Development Briefs) would help to clarify the planning mechanism that will be used to secure any split of development costs on each of the allocated sites, thereby improving the efficiency of the planning and development process by reducing uncertainty as to what is expected from each development. This in turn will facilitate a joined-up approach to development in line with the stated purpose of the Development Briefs (Section 1.2).

We trust this is of assistance and look forward to being kept advised of the progress of the Local Plan Partial Review Development Briefs.

Yours sincerely,



HEATHER PUGH  
Partner  
David Lock Associates  
on behalf of the Tripartite/OD

Email: [hpugh@davidlock.com](mailto:hpugh@davidlock.com)

STEVEN SENSECALL  
Partner  
Carter Jonas  
on behalf of Hallam Land Management

Email: [steven.sensecall@carterjonas.co.uk](mailto:steven.sensecall@carterjonas.co.uk)

**From:** Philip R Skipp [REDACTED]  
**Sent:** 07 September 2021 10:23  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Cc:** Begbrook PC <begbrokeclerk@btinternet.com>; [REDACTED] begbrokevhsec@gmail.com  
**Subject:** PR9 Consultation Response BVHMC

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sirs,

Please find attached the response of Begbroke Village Hall Management Committee to the PR 9 Design Brief proposal - plus Village Playing Field Survey..  
Philip Skipp. Chair.

**Cherwell District Council. PR 9 Land West of Yarnton Development Brief. Public Consultation.**

**Begbroke Village Hall Management Committee Response.**

Regarding the above, our committee would like to submit the following:

The PR 9 development brief is bright and detailed, with plenty of charts, photos and diagrams. However, an overriding impression is that PR 9 will stand in isolation, instead of being part of a much larger whole, particularly when PR 8 is completed. Begbroke is shown as peripheral to it – not part of it. Whilst there will be facilities in the new development which villagers in Begbroke may indeed benefit from, conversely there are facilities in Begbroke, such as ours, which could be of benefit to the occupants of PR 9.

Our committee are keen to point out that the design brief shows no public meeting place/community centre/or hall planned for the new developments. Also, other than school grounds, there is no large expanse of ground available for sport and recreation. This is something that Begbroke Village Hall can provide, along with an established Bowls Club, children's play-area, and 4.5 acres of grassed field. In 2019 our committee carried out a village wide survey (attached) which demonstrated quite clearly that with more investment, improving our facilities would appeal to a wider range of people. If the PR 9 & 8 developments are to be examples of 'healthy place shaping', then it would seem sensible for CDC, before granting planning permissions, to consider the whole development, and get a commitment from developers to contribute toward improving facilities at Begbroke Playing Field.

Additionally, access to our facility is important, so a signalised pedestrian crossing at Begbroke, to ensure safe passage across an increasingly busy A44, is very much needed.

**In Summary:**

- **Begbroke is not peripheral to PR 8 & 9, and therefore investment in its playing field facility would benefit the whole development.**
- **A controlled pedestrian crossing at Begbroke is required, and long overdue.**



## **BEGBROKE VILLAGE-WIDE PLAYING FIELD SURVEY – RESULTS.**

<b>Number of Leaflets Delivered. 312</b>	<b>Hard Copy Returns 51</b>	<b>On-Line Returns 50</b>	<b>Total Responses 101</b>	<b>Percentage Response Rate 32.3%</b>
<b>How often do you use the playing field?</b>	<b>Never 25 (25.25%)</b>	<b>Sometimes 47 (47.47%)</b>	<b>Often 26 (26.26%)</b>	<i>*These responses only total 98, as 3 people did not give an answer to this question.</i>
<b>Which of these would encourage you to use the field more often?</b>	<b>Multi-Sport All Weather Court 46 (46.46%)</b>	<b>Environmental Features (Pond, Trees, Shrubs etc.) 70 (70.7%)</b>	<b>All-Weather Outdoor Exercise Equipment 51 (51.51%)</b>	<b>More Seating and Play Equipment 53 (53.53%)</b>

### **All On-Line and Hard Copy Suggestions and Comments: (45)**

Tennis, Putting, Allotments, Archery.

Tennis Court

Would love all of the above. Play equipment needs updating. Should be priority.

Area of wild flowers. Natural environment for bird's insects. Benches.

Some restricted access for dogs on lead would make it easier, I appreciate why dogs are not currently allowed.

With the large dog community in Begbroke, a dog park would be really helpful, taking into consideration the new houses to be built.

Would love to see more modern wooden play equipment like at Tackley or Finstock esp with something for older children like a zip wire or curly slide. The field is a beautiful space, so we hope any additions are in keeping with the natural environment. Thank you for all you do. We look forward to using the field for many years to come.

Organising matches, competitions.

2 or 3 benches placed around gravel walks.

Local Youth Football is crying out for astro pitches, big & small. Yarnton Blues might hire it regularly!

All weather court for tennis. All ages can play and a non-team activity and not all in teams. The playing field is too hidden and does not allow dogs. Why not open up the playing field visually, to the road + village as a whole? And move the play area, bowls club down the field. At present the only ones who benefit from the playing field are those whose gardens back onto it! Probably half the village do not even realise there is a beautiful open green space behind the ugly bowls hut.

A better equipped park for all to use.

Bring back the cricket!

Want enough playing field left for young people to play team sports in the future – keep grass area for this.

I would not use an all-weather court but it would be good for the younger people – also an area for dog walkers.

A lovely open space where we can enjoy recreation away from dogs and traffic.

Running track (joggers).

Somewhere to play football 5 a side or similar.

Allow dogs to be exercised. The cost of drainage and building of hard courts will take more than 40 years to re-pay if ever. At the moment in the evenings the field is used by people smoking and making transactions of illegal substances. For the small minority who do not clean up after their dogs, it is an improvement on used needles that have been found. Cutteslowe Park mixes sport and dog walking, so why can't Begbroke.

Please provide some good posts so we can have a game of football, tennis court.

5 a side football pitch – now. Aunt Sally, Cricket nets.

Tennis court.

Tennis Court.

Dogs on leads walked on field? Coffee facilities. Bicycle parking. Thank you.

Path for dog walks. a) Convert part of top end into allotments (recreation) b) more fetes/family events on field. c) Two goal posts for kick abouts.

As a dog owner I am not allowed on the field for my walk, so I wouldn't want to contribute to something I can't be allowed to use.

The tarmac for the current basketball hoop and football goal is far too small to have any sort of game on. If this was made bigger I think it would increase usage. We get a lot of use out of the park, but it is limited. Perhaps a trampoline and some better climbing equipment would be good. I would definitely make use of outdoor exercise equipment. I currently cycle across to the set-up in Kidlington field, it would be great to have similar in our field. Finally, thanks for putting this review together, if you need volunteers to help with improvements I would help.

Allow dogs on a lead

I am an older person so don't visit. But when my grandchildren visit I'm sure they would use all the above equipment a skateboard/scooter/bicycle ramp play area would be an attraction for children and older teenagers; a cricket net in the corner of the field might attract groups of cricketers or solo bowlers; a zip-wire might be popular with younger age groups.

It would be great to do an annual event, say a beer festival.

I don't know how practical it would be, but a pond big enough for ducks?

Emphasis the seating to complement orchard etc.

More modern play equipment would very welcome, as the current equipment is quite old. Would be great to have a circular net swing or a wooden tractor for imaginative play. A zip wire would also be great. Additional environmental features in the field, such as a pond, would be a good addition to the field.

More modern play equipment would very welcome, as the current equipment is quite old. Would be great to have a circular net swing or a wooden tractor for imaginative play. A zip wire would also be great. Additional environmental features in the field, such as a pond, would be a good addition to the field.

(Aged 5) says "really big monkey bars, pirate ship, more slides", and (Aged 9) says "sunken trampoline, climbing wall or bigger climbing frame". Happy to help in any way we can.

Outdoor table tennis table eg butterfly city concrete table £1699.99

I would use it more if there was an option to play tennis on the multi-sport court.

Buy All-weather outdoor exercise equipment, I mean tasteful simple things like pull-up bars. The ugly metal machines that get put up are not only ugly but not useful to anyone other than to make people feel "they are doing some exercise". So I'm thinking, some pull-up bars (varying heights to accommodate all



sizes), and parallel bars, maybe somewhere to do work the core/back. There doesn't have to be much. Keep it simple and to the point. Hope that helps as I don't know what is meant by "All-weather outdoor exercise equipment".

A netball court and/or netball net.

With more family's moving to the village it would be nice if the park was updated and useable for all age groups. Toddler climbing frame!

Cricket pitch/team.

More seating please as we have such a lovely field but not a great deal of seating. If there were funds it would also be lovely to have the playground updated.

Very important to keep a playing area. We used it a lot when the children were young. Adult exercise equipment would be an excellent addition and also the environment features. Coupled up with the orchard this would open up the field for the wider community to enjoy. Thank you all for your efforts in improving the village facilities.

Maybe allowing dogs in on leads.

More clubs using the area as it was intended for sport.

**From:** Yarnton Flood Defence <yarntonflooddefence@gmail.com>  
**Sent:** 08 September 2021 22:06  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Subject:** PR9 Development Brief - Yarnton Flood Defence Response



Hello Development Brief Team,

Please find attached our letter in response to the draft development for PR9 - Land West of Yarnton.

We welcome the opportunity to consult with you further on the comments and information provided.

Kind regards,



Ref: Local Plan Partial Review Draft Development Briefs for PR9 (Land West of Yarnton)  
Date: 08.09.2021

Dear whom it may concern,

Thank you for the opportunity to comment on the development briefs recently released for public response with particular focus on the development PR9 – Land West of Yarnton. On behalf of the village residents, we have concerns regarding several points outlined below and believe these should be taken into careful consideration within the planning of the proposed development.

Our primary concerns are:

1. No acknowledgement or consideration of the combined flood risk from groundwater and flash flooding at the development site or existing village both of which have been shown to be at real risk and not just hypothetical with recent evidence to showcase this
2. No acknowledgement or consideration to address existing flood risk from foul sewage, again, which has occurred recently and historically
3. Limited understanding of historic drainage channels and local topography with disconnected development leading to a heightened flood risk for the whole community
4. Inadequate drainage assets both historical and part of development sites which have not considered the wider community context and been neglected for many years

What we are seeking is a well-planned and empirically evidenced proposal from the developers that addresses the existing flooding risk to the wider village of Yarnton and not just the site of development with an adequate surface water and drainage strategy in place. The overall risk of flooding should not be increased either during development or post development. Given the known flooding risk to the village, both of which ODC and CDC are fully aware of, we believe an in-depth flood survey across the full village should be undertaken as part of the project and a condition placed on the development to achieve it so that the risk of flooding is mitigated against through design and maintenance. We believe that the local flood authority has a duty to protect our community and may even consider extending the flood assessment and management to PR8 due to its close proximity and likely connected influence.

We would very much welcome the opportunity to engage with you and the planning team on these matters and look forward to receiving your response.

We have extensive evidence of the flooding that occurs in our community and have spent time mapping all water courses within the village to identify the issues and possible solutions all of which we can make available should they be beneficial to the development brief. Below is further evidence and information to support our response.

**Local context:**

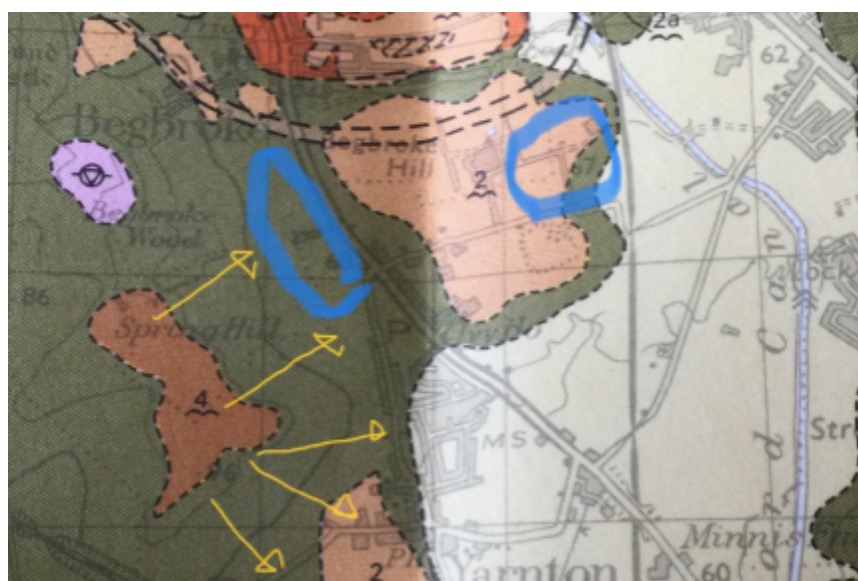
Yarnton is a historic village with human settlement dating back 3000 years with a permanent settlement being recorded here in the Domesday book. Over time the village has grown from five farms at or near the junction of Cassington Road, Rutten Lane, and Church Lane to the village it is today with hundreds of properties with thousands of residents.

Flooding in the village is not new and has been occurring over many years. The Environment Agency has issued flood alerts and warnings for large areas to the south of the village on many occasions which often coincide with perfect flooding conditions, a high water table and heavy surface water run off, events we have experienced far too frequently.

The hap-hazard expansion of the village without careful consideration of local topography and drainage has without doubt contributed to the increased risk of flooding to the whole community with the historic core at greatest risk. We fear that further development will exacerbate this issue, increasing the frequency of large flooding events without careful planning and consideration.

**Proposed development site:**

The proposed PR9 development site is located on the eastern slope of Spring Hill and falls sharply towards the A44. The top of the hill comprises an ancient river gravel terrace which overlays the Oxford Clay band. The terrace gravel is known to store groundwater and there is a spring-line on the slope at the junction with the clay band, hence the name Spring Hill. To the east of the Oxford Clay is the River Cherwell/Thames alluvial drift deposits mostly consisting of sandy clays which is relatively permeable in comparison to the heavy clay. The topography and geology of the area would suggest the ancient surface water and groundwater regime was for the terrace gravel to discharge at the spring-line onto the surface of the clay band and flow across land to meet the alluvial drift deposits and from there into open channels feeding into the Thames.



BGS extract showing ancient river terraces, Oxford Clay and alluvial drift deposits. The blue indicate areas which were under standing water for an extended period over the winter months in 2021

We suspect that Rutten Lane was at first an un-metalled track connection to Begbroke, its route being along the bottom of the Spring Hill slope. The track bed lays mostly on the impermeable Oxford Clay probably leading to it becoming rutted and virtually unpassable in winter. The metalling of Rutten Lane enabled the village to expand northwards first by speculative frontage development on both sides of the road and later by infill development.

The impact of this has been to disrupt the original flow pattern off of Spring Hill, training it towards a constantly reducing number of open gaps in the now continuous dwelling frontage. There is still an open ditch in parts on the west side of Rutten Lane which we think was originally intended to cut off the flow from Spring Hill keeping the road dry and channel the water to crossing points under the lane. With the now continuous dense frontage development the ditch has largely been made redundant with perhaps the exception of being used as an open soak-away for the school roofs and hard paving which is particularly noticeable.

It is not entirely clear how the drainage of the village between Rutten Lane and the A44 is now supposed to work. We have been reliably informed that there are no public surface water sewers in the village and it is entirely drained by a patchwork of highway drains and riparian ditches. Many of these seem to have been abandoned or backfilled resulting in their continuity having not been



Extract of OS map showing the topography of Spring Hill and the limits (in grey) of the impermeable Oxford Clay

maintained. There seems to have been a disjointed and only rudimentary consideration of how a combination of flash flows and groundwater runoff will reach the River Thames through this system which has further exacerbated the problem faced in the village of seasonal flooding.

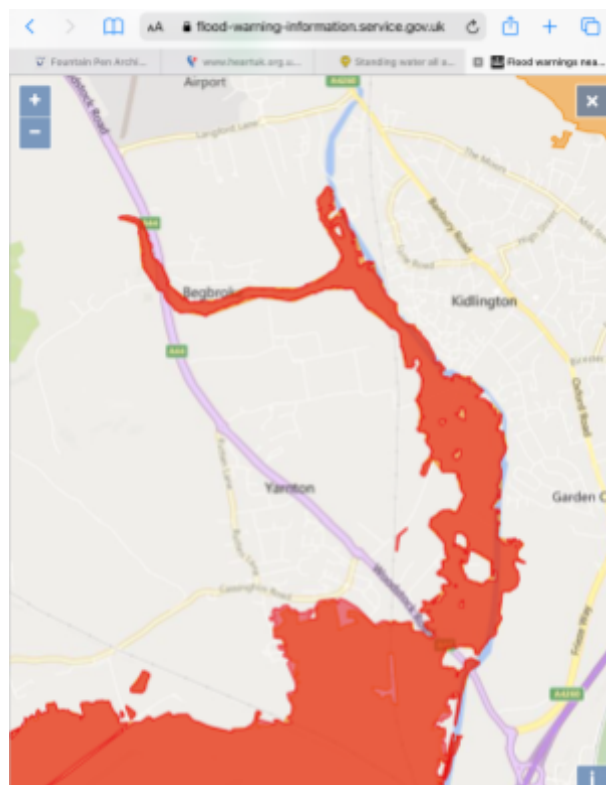
Having extended north over the past 50 years the village has gradually cut off the natural combination of groundwater and surface water flows from the higher ground overlooking the village. The proposed PR9 development will continue this trend extending the village yet further north and more or less fill the remaining drainage corridor between Spring Hill, the Cherwell and Thames flood plains.

One of the most recent extensions north along Rutten Lane has been the construction of the Yarnton Medical Practice. The site does include a SUDS attenuation pond, which was quickly overwhelmed by the Christmas 2020 surface water flash flows off the fields onto which the PR9 development adjoins, with the excess water freely flowing through the nearby streets to the dual carriageway.

The two principle flash flood routes now seem to be; the Cassington Road and Church Lane to the south and the north section of Rutten Lane into Aysgarth Road, effectively the north and south extremities of the current village.

It has also put new areas at risk including the most recent large development off of Cassington Road. Residents were assured that sufficient measures had been designed into the scheme to safeguard it from up to 1 in 100 year flood. What was observed was the attenuation ponds were already partially filled with groundwater from the Thames water-table in advance of the Christmas flash flood event. It is our understanding the ponds were at one point during the Christmas event perilously close to being overtopped.

Considering the close proximity of the River Thames water-table outline, we would like to know what allowance was made for the possible presence of groundwater in the SUDS design? At the same time the Environment Agency had put the area on a red warning for groundwater flooding. The Agency's flood warning zone abuts the southern fringe of the village.



Extract of Environmental Agency Flood Warning map  
abutting Cassington Rd

It seems this opens the possibility of a number of combinations of high groundwater levels in the Spring Hill gravel terrace. High intensity rainfall over the local catchment and a high water table in the River Thames could all combine to bring the flood risk to areas of the village well short of the 1 in 100 year gold standard quoted in early consultation information.

It is our contention that the planning brief for PR9 should contain a requirement for a full investigation of how the existing village will be protected from flooding including the PR9 and also perhaps PR8 at a strategic level. This of course may highlight the need for additional “off-site” works that the planning and drainage authorities will need to decide how they would be funded. It is also our contention that the local drainage authority has a duty to protect from flash flooding the existing population as a consequence of the development, particularly considering its scale.

We can perhaps forgive previous generations of planners for lack of knowledge and foresight about the hydrological implications of the ribbon development that took place in the village and perhaps hampered by lack of statutory powers to appropriately control it. Now, through the emergence of the unintended consequences of their past decisions we have seen first hand, ignorance will be no defence.

#### **Sewage Management:**

Your draft document references pumping mains crossing the development site. Is it serving Begbroke and linking it to the now derelict Yarnton sewage works, or is it linked to discharges from the Cassington sewerage works? Cassington works seem much too large for Cassington alone. Can we therefore assume it also treats sewage from Eynsham?

We would also like to know if the treated effluent is then pumped east into the Cherwell catchment and discharges into an open watercourse presumably on the east side of the A44.

Another question is whether Thames Water is currently licensed to discharge untreated sewage from Cassington sewage works (in storm conditions when capacity of the works is exceeded) into the natural environment and if so, then where does it outfall?

Carterton and Witney in the Windrush Valley have been allowed to expand at a pace with very little consideration of the risk of untreated sewage overflow due to insufficient sewage storage capacity in the catchment. I’m sure you are well aware of the ongoing campaign to stop the continuing pollution of the River Windrush. We are very keen to avoid the same situation with the Rover Cherwell.

We have concerns about the public foul sewerage and its ability to cope with 540 additional homes. Our concern for Yarnton is that foul sewage flooding already occurs simultaneously with groundwater flooding and flash flooding. This resulted in village residents having to endure their gardens filling with untreated sewage on a regular basis when the water table rises.

Thames Water operatives who attended the most recent incident stated they were unable to offer practical assistance because of groundwater infiltrating and filling the foul sewerage, similarly

overwhelming it as it does the surface water drainage system – foul drainage should be a self contained system, not subject to fluctuations in groundwater levels, however we do appreciate the circa +20% extra capacity Thames Water have to pump away excess surface water that enters their system.

Our fear is that the connection of 540 new homes (and eventually the addition of PR8) will make a repeat of this event far more likely and more extensive in years to come. There seems to be a similar picture developing across the country. We have already mentioned Witney – Oxford City also has a problem with the inundation of the foul sewerage when the River Thames is in flood, which Thames Water is unable to fully explain or offer a remedy to. A large part of the Public Health Legislation was aimed to ensure proper drainage and a healthy environment free of filth in urban areas. We can't lose sight of that in the current dash for growth.

#### **SUDS and Surface Water Management:**

Developers put great faith in the provision of SUDS that comply with national guidance. However, designing to a 1 in 100 year return does not in itself provide assurance for the next 100 years. That requires an appropriate level of maintenance over the same time period. The development will create new infrastructure that residents will rely upon to protect their homes for the next 100 years. Previous SUDS schemes the liability to maintain this capacity has not been made entirely clear (via a planning condition or covalent on the development) and we suspect many will look to the local District or Parish Councils as the responsible body of last resort.

As we have seen in recent flooding events there is minimal planned maintenance carried out on the existing drainage assets. Intervention has simply been to respond after the event when it is too late to be of practical help. There is no flood warning system in operation for flash flooding. A suitable method of guaranteeing, or ring-fenced funding must be put in place to ensure maintenance activities do regularly happen, not left at risk of economic austerity forced upon local councils. Maintenance of the physical environment (roads, drainage, public parks and open spaces) is usually the prime target to budget cuts.



Our final point is that however sophisticated or robust the SUDS designs submitted by the developer might be, it will rely to some degree on assumptions about probable rainfall profiles, water-table levels and infiltration rates over weeks and months prior to a localised torrential downpour. We are sure the risks will be designed out as far as practicable, but we will inevitably be left with a residual risk.

We would like to know who will be liable for this risk and do they propose to secure an appropriate level of flood insurance cover for losses that the existing village and possibly the proposed development might suffer? If not; can you tell us with whom the residual risks will finally rest?

We will look forward to hearing from you in response to the above.

Best regards,



[yarntonflooddefence@gmail.com](mailto:yarntonflooddefence@gmail.com)

**Yarnton Flood Defence is a voluntary organisation run by residents from the Village of Yarnton. Supported by Yarnton Parish Council the aim of the group is to reduce the flooding risk to the entire community of Yarnton collaborating with Oxfordshire County Council, Cherwell District Council, The Environment Agency and Thames Water.**



Photos of flooding in Yarnton during winter 2020





To: Director of Planning & Development,  
Cherwell District Council,  
Bodicote House,  
Bodicote,  
Banbury,  
Oxon,  
OX15 4AA.



29 August 2021

### **Land West of Yarnton Development Brief - PR9 Draft for Consultation**

Thank you for the opportunity to comment on your draft brief that you have made public.

I have concerns that it says nothing about the need to address the combined risk of groundwater and flash flooding to which both the development land and the existing village has been susceptible for at least the last 30 years. Similarly, it doesn't say anything about addressing the flood risk from foul sewage overtopping Thames Water and private drains which some residents had to endure for a period during flooding, leaving them to clean up the filth.

I was stunned to hear from the Yarnton Flood Group that at their meeting with representatives of the County and District Councils that they initially claimed they had no record of Yarnton ever having been flooded. During the recent Christmas event I spent a number of hours redirecting through-traffic coming off the A40 away from Rutten Lane until the fire brigade attended, took control and closed the road. The bus company had to reroute the S3 bus via the A44 until water levels in the village had dropped sufficiently to enable the service to resume. Thames Water attended but were unable to give assistance because the foul drains were also overflowing with surface water. The Oxford Mail also contains plenty of evidence of the events.

I have lived in this village for 30 years and have witnessed similar events on at least three occasions, the most recent at Christmas 2020. Groundwater flooding also continued in Church Lane on PR8 and PR9 for days following the event. How is it possible that the Local Flood Authorities have no records of these events. I'm sure I can find plenty of residents who can similarly testify to this. The Christmas flooding was not an exceptional event. Arguably it represented a 1 in 10 year return storm. How will an additional 540 house impact upon that. Reduce it to a 1 in 5 return period perhaps?

You are now proposing to extend the village yet further north closing what's left of the flood corridor around the village for both surface water and ground water off Spring Hill. What measures will the planning authority require of the developer to safeguards existing residents as well as the new ones?

Yours sincerely



Yarnton Flood Group



Yarnton,



**From:** Lynne Whitley <parishclerk@yarnton-pc.org.uk>  
**Sent:** 21 September 2021 10:55  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Subject:** PR9

[REDACTED]  
[REDACTED]  
Please find attached Yarnton Parish Council's response to the PR9 Development Brief

Regards

Lynne Whitley  
Parish Clerk  
Yarnton Parish Council

[REDACTED]  
[REDACTED]  
Website: [www.yarnton-pc.org.uk](http://www.yarnton-pc.org.uk)

# Yarnton Parish Council

Clerk to the Council  
Yarnton Village Hall  
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e-mail: [parishclerk@yarnton-pc.org.uk](mailto:parishclerk@yarnton-pc.org.uk)

Cherwell District Council,  
Planning Service,  
Bodicote House,  
Bodicote,  
OX15 4AA.

21<sup>st</sup> September 2021.

## **Yarnton Parish Council's Response to Cherwell District Council's Draft Development Brief for PR9**

This document supplements initial comments submitted by Yarnton Parish Council (YPC) ahead of a Zoom meeting with Cherwell District Council officers held on 31st August 2021.

Cherwell District Council (CDC) should work more closely with critically affected neighbourhoods to determine an overall structure of development style, build types and infrastructure across adjacent sites (eg. PR8 and PR9). Creation of separate development brief documents without an overarching document updated from earlier versions of the Local Plan Review is unhelpful. YPC remains concerned that the PR9 development is being considered in isolation from the other development parcels and would welcome clarification as to what the overall makeup of the infrastructure between Begbroke, Yarnton, Kidlington and Gosford will look like. The Development Brief for PR9 alludes to some infrastructure details such as schools in PR8 and sporting facility at Stratfield Brake, but still leaves residents unclear of the District Council's overall intentions. A fuller understanding of the entire development would help the Parish Councils take a more considered view of the proposals in each development site.

1. CDC will be aware of **Yarnton's flood risk**. YPC has agreed three key areas to prioritise and one of these is flooding supported by the Yarnton Flood Defence Group (YFDG) which has undertaken to properly understand local watercourses and flood risks. A development on Spring Hill is a concern as the village is already affected by water flowing off it, with flooding near the Medical Centre on Rutten Lane and Aysgarth Road. We hope that the development will not only ensure that the infrastructure is sufficient to manage on-site water flows, but also does not transfer flooding issues to the village's older pipe network which would be unable to hold larger capacities. YPC and YFDG would therefore welcome the opportunity to engage with CDC and the developers to ensure that the development does not increase the risk, but works to reduce the risk with appropriate piping infrastructure and plans for ongoing maintenance so that future generations are protected.

*[YFDG has submitted a separate and thorough response to the development brief related to the issues of flooding. Yarnton Parish Council support this submission and strongly recommend that CDC take note of the information and evidence provided.]*

2. The second key priority for YPC is **traffic (volume and speeding violations)**.
  - a) YPC needs to understand what measures will be in place to mitigate increased traffic and speeding.
  - b) Despite planning strategy proposals to promote walking, cycling and use of public transport, increased traffic volume on the A44 is inevitable with the development of PR8 and 9 and other developments outside CDC boundaries. Traffic flows must be maintained on it and side roads (eg. Cassington Road, Sandy Lane and Rutten Lane). An up-to-date traffic impact assessment covering roads within the village of Yarnton must be a minimum requirement before plans are finalised.
  - c) Speeding with its accompanying noise and air pollution is an issue along the A44. The brief should ensure measures will be in place to compel traffic to remain within the proposed 40 mph limit. The implementation of Average Speed Cameras would help enforce traffic speeds as would calming measures approaching roundabouts and crossings.
  - d) It is the understanding of YPC that OCC plan to introduce a 40mph speed limit and traffic light controls at roundabouts along the Yarnton section of the A44. With the introduction of pedestrian crossing points described in PR9 Briefing Document it is again important to understand the effect of all elements on A44, Cassington Road, Rutten Lane and Sandy Lane traffic flows. YPC also supports Begbroke's request for a pedestrian crossing to ensure safe crossing between the east and west parts of the village.
  - e) Parking outside William Fletcher School by staff and during school drop-off and pick-up is already an issue. Measures to prevent this must be an explicit part of the brief.
  - f) The proposed access point to PR9 on Rutten Lane by Yarnton Medical Centre introduces a hazard consequent to sight lines related local road contours. The proposed bus stop opposite will also further complicate this spot. We have been informed by Merton College that at peak times they anticipated vehicles using that junction once every twenty seconds. We recommend that this access point reverts to the A44 as in earlier plans as this is the most unsafe part of that road. Although it is within the 30mph speed limit, the majority of the traffic passing that point is travelling faster; we monitor the southbound traffic at that point and our figures show consistently that more than 50% of the vehicles are travelling faster than 30mph and always some over 50mph; after coming off the roundabout the traffic speeds up as it enters the village rather than slowing down.
  - g) Unless counter measures are established, access and egress at the proposed point in Rutten Lane will create increased traffic volume along with its associated noise and air pollution in Rutten Lane, Aysgarth Road and The Garth. It is recommended that appropriate traffic-calming measures are installed as part of the plan.
  - h) CDC should argue against proposed closure of Sandy Lane crossing to vehicular traffic. Its closure will inevitably increase traffic on the A44 and diminish access to medical, dental, religious, banking, shopping and leisure facilities within neighbouring communities.
3. YPC **welcomes the inclusion of green spaces** including the community woodland, allotments, nature reserve and extended cycle/footpaths. Amenities need to be integrally developed in the early stages of the development and be made rapidly available to residents. The Parish Council will need clarification of the ownership and ongoing responsibility for these areas and how maintenance will be funded. The Parish Council's preference is that ownership and maintenance responsibilities of all green space amenities including play areas lie with Cherwell District Council. The Parish Council also requests that a covenant is placed on all the remaining green spaces

(fields, community woodland, etc) to prevent any future building development leaving the green space for the community in perpetuity. The inclusion of green space chimes YPC's Climate Emergency commitments to help secure the safety of future generations who live in and near Yarnton village. We have been mindful of our responsibilities towards our environment, our fauna/flora wildlife and our carbon footprints with any activities the Council undertakes. The increased housing in the area is an obvious threat to these commitments and the retention of as much natural green space will remain a valuable asset.

YPC welcomes that consideration has been given to giving access to those with restricted mobility to enable all residents to access all green spaces. It is indicated that the nature reserve is for use of William Fletcher School, but within the bounds of safety and duty of care it should be possible that access will be available to all residents as access (including for those with restricted mobility) to a nature reserve and other green spaces for all ages would be a positive development. Yarnton Parish Council does not support a change of Frogwelldown Lane to become a bridleway or cycle path. Although this type of access to the area is desirable it must be established in a different way in order to protect the historic nature and character of the footpath.

4. The inclusion of good quality play areas with an appropriate variety of equipment is welcomed. The third YPC priority area is **youth provision** (all ages) and whilst the development brief refers to playgrounds for the younger ages there is clear absence of facilities for older children which the Parish Council believes would help combat anti-social behaviour. YPC will support work to develop facilities for older children and is currently working with the *Yarnton Playground Development* Group to survey children (of all ages) about what facilities they would like. S106 monies must be made available to support local plans to improve access to, and facilities to all child age groups. The University of Oxford has a commitment to build a stronger and more constructive relationship with the local and regional community and represents a resource opportunity to share its expertise to provide and support educational and developmental facilities for locals. Yarnton Parish Council hopes CDC will encourage the University to engage with local communities.
5. The provision of **sporting and recreational space** is also a concern for the village. Yarnton has very active football and netball clubs. Each section of these clubs desperately needs more space to accommodate the enthusiasm for the sport with the playing field space already unable to support the current demand (see annexe). The Development Brief alludes to a sporting hub located within the PR7A site. It cannot be expected that all users are able to walk or cycle to such a hub: some may have accessibility issues (it shouldn't be assumed that everyone is an elite athlete) and some may not wish to travel by foot or cycle on dark evenings – especially children. Virtually no direct public transport to the area exists from Yarnton so the natural consequence will further increase traffic on the A44 and other roads. Provision within the area of PR9 plus S106 monies must be available to increase, update and improve existing local facilities.
6. Yarnton is a village and PR9 is described as an extension to a village. With that in mind YPC considers 4 storey buildings to be out of keeping with a village environment. Any **building heights** should not exceed that of the buildings in the Cresswell Close/Hayday Close development to the south of the village. Furthermore, a village represents a community of all ages. Must all residents wishing to live in single-floor accommodation be restricted to live in a multi-storey flat/apartment? A community needs single floor dwellings – bungalows. No provision is shown in the brief which merely reflects the initial proposals set out by Merton College. This has further bearing on the earlier YPC concern that without co-ordinated development plans between adjacent sites, if not overall, it is not possible to know whether the visual aspect will shock, depress or please those



living within or even passing by. If 4 storey building is allowed each side of the A44 (PR8 and PR9) a high sided corridor with claustrophobic impression will be created.

7. Definite limits should be imposed to minimise light and noise pollution, for residents and wildlife in the green spaces. Timed lighting should be a minimum requirement within the brief.
8. Developers/construction contractors must adhere to Climate Change policies and adhere to the highest environmental standards including solar panels, triple glazing and insulation.
9. Developers should be penalised for deviation from the brief.
10. YPC is not convinced that the full impact of an additional 2500 homes between the villages of Yarnton and Begbroke has been accepted by primary care healthcare facilities. (Accommodating the entire proposed new housing stock within Oxfordshire at secondary and tertiary healthcare levels will introduce waiting list pressures that trivialise those consequent to COVID-19.)
11. YPC must be appraised about decisions related to the use of S106 monies and be assured that proportional benefit will be available to existing residents of Yarnton.

Yours sincerely

Lynne Whitley  
Parish Clerk

## **Annexe Sports facilities**

### **Football**

We are currently having to leave players out from match day squads on Saturday as we are having an excess of players available compared to spaces available. For example we had 10 players who were available last Saturday that we had to unfortunately tell we couldn't include.

In addition to this, whilst we don't ever tell anyone they can't come training, the space we have to use, especially during winter months when we need use of floodlights, means it makes planning training sessions difficult sometimes due to having too many players at training compared to the space to operate in so this can hinder our training.

We have in the region of 60 players signed on for us which highlights the issues mentioned above in terms of not being able to offer football to everyone on match days and also how training sessions can be impacted on due to having too many people there for the space we have to use.

We have in fact discussed, albeit very briefly, potentially having a 3rd side due to number of players we have. The main issue which we have with this, and is what stopped us progressing any further with it for this season, is we would have no pitch or facilities for a third side to use.

The main basis of our players are from Yarnton and Kidlington. We do have some that come from other parts of Oxfordshire too but the majority are Yarnton and Kidlington.

### **Netball**

From a junior point of view we are full. We have girls from Kidlington, Yarnton, Begbroke, Long Hanborough, Witney and Oxford.

We have had girls on the waiting list for 6 months as we have really good retention of our current players so getting them in has been really hard. We know planning ahead that we have 8 girls currently in year 6 at William Fletcher primary that we don't have space for. Clubs are running at capacity so an increase in girls of secondary age we wouldn't be able to offer any places too.

We have the coaching capacity to have more players but we are restricted by the venue size. We ideally require more court space to be able to accommodate new players/residents.

Ladies are from Yarnton, Kidlington, Begbroke, Bicester, Oxford, Witney, Long Hanborough, Freeland, Eynsham and Woodstock.

Worth bearing in mind that with Kites not having a senior team we are the only club offering netball for ladies in the area. Eynsham, Witney, Bicester being the closest clubs for us. Within Cherwell District it would be us, Bicester and then the Banbury based clubs.

**From:** clerk@begbrokepc.org.uk <clerk@begbrokepc.org.uk>  
**Sent:** 14 September 2021 14:52  
**To:** Nathanael Stock <Nathanael.Stock@Cherwell-DC.gov.uk>  
**Cc:** Development Brief <developmentbrief@cherwell-dc.gov.uk>; [REDACTED]

**Subject:** RE: Development Briefs consultation

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Nathan - please find comments from Begbroke parish council.

Regards

Jeff

Jeffrey Wright  
Clerk to Begbroke parish council

<https://www.begbrokepc.org.uk/>

General Data Protection Regulations 2016 (GDPR) and the Data Protection Bill.  
Begbroke parish council will retain your e mail details unless you inform them otherwise.

**PR9 Land West of Yarnton - comments and observations**

- a These plans offer very little to Begbroke and difficult to see how the possibility of perhaps a 1000 more residents in houses could improve the village.
- b **A Pedestrian crossing for Begbroke village** is not included in the plans This is a major priority for this village and there is much correspondence on this recorded with Oxfordshire County Council. **There must be a commitment for section 106 monies from the developers.**
- c The current lack of a controlled crossing is also discriminatory to the old, the very young and anyone who is mobility impaired. This need to be addressed in advance of any construction works.
- d Sewage - capabilities of system to cope
- e Increased air pollution - is regular monitoring to take place?
- f Transport Links - no direct bus link - without impractical bus changes, to Oxford Parkway or Water Eaton P&R which has buses to hospitals.
- g Ideas about Dolton Lane are upsetting. The nature of this lovely ancient rural lane is that sometimes it is impassable, but this is what makes it so special. It would be a disaster if it were turned into an urban pathway as shown on Pages 28 and 36. The character of the lane would be lost forever
- h Turning the whole Binfield into woodland rather than just part of it is not a preferred option. It is such a special field for wildlife

- i The speed awareness signs are working overtime now - another reason why a crossing is required.
- j If the proposed new Railway Station is built near, the science Park, surely keeping Sandy Lane open both ways would make sense.
- k No retail provision meaning that all residents must go to a larger settlement such as Kidlington for shopping. The nearest small facility to Begbroke is Budgens Yarnton.
- l Shopping trips will require car journeys either via Langford Lane or Loop Farm if Sandy Lane is closed. People without transport will be stuck especially with one mini-bus trip/week. This must be addressed.
- m Not sure how the development of agricultural land can be considered to 'provide significant ecological and biodiversity gains'. Development and increased population bring disturbance to wildlife including the presence of cat's dogs and rats. Inhabitants to the north of the site would find the facilities in Begbroke e.g., village hall bowling green and playing field closer than that of Yarnton. Funding towards improvement of facilities could be provided. A pedestrian crossing is needed at Begbroke for safe access to these facilities.
- n In item 5.1 there is reference to provision of sports facilities. 1. 'It is the Council's preference that in lieu of on-site formal sports provision an appropriate financial contribution be made towards new and improved facilities at southeast Kidlington'

- o Given that there appears to be an option why not consider developing the playing field and village hall at Begbroke? There is already desire for an all-weather surface multi-sport facility - the current arrangements need improvement, and we have the space. This is likely to be cheaper and has the benefit of developing the social amenities within the village which can also be used by inhabitants of PR9 (and PR8) a pedestrian crossing is needed at Begbroke for safe access to these facilities.
- p The design brief shows no public meeting place/community centre/or hall planned for the new developments. Money should be allocated to improve existing Begbroke facilities at village hall.
- q Allowing traffic on to the A44 at the science park junction will further increase queuing and probably reduce the gaps in traffic through Begbroke making it even more difficult to cross - the current traffic light sensors are also defective.

**PR7 - Comments and observations**

Plans for Frieze Farm Sandy Lane is not shown, and not sure it is for the Science Park Development, or ours and Yarnton. Surely 106 money could be used to help fund a bridge at

a Sandy Lane and a crossing for us.

If the proposed new Railway Station is built surely keeping Sandy Lane open both ways would

b make sense.

Can't see why they need a community orchard when there is already a formal orchard - seems just a buzz word to make everyone feel happy. The reality is more likely to be that in a

c few years it will be neglected and a waste of space.

Vehicular access to the roundabout is far from ideal and will push more traffic onto a narrow

d service road. - don't know how southbound traffic will flow.

Part of the brief calls up resin bonded gravel as a surface for roads - not a good idea as once it cracks you can't easily repair it and given the current performance of highways dept the area

e will soon look awful.

Roads need to be wide enough for on street parking and adequate visitor spaces must also be

f provided.

Who is going to cover the costs and be responsible for maintaining the orchard and play

g areas etc?

>  
> -----Original Message-----  
> From: Peter Hewis [REDACTED]  
> Sent: 07 September 2021 16:47  
> To: Development Brief <[developmentbrief@cherwell-dc.gov.uk](mailto:developmentbrief@cherwell-dc.gov.uk)>  
> Subject: Yarnton PR9  
>  
>  
> CAUTION: This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.  
>  
> Oxford's desperate need is for social housing (formerly called council housing) and low cost housing but I can't find any reference to that in document PR9. Please tell me how much social housing there will be. "Affordable housing" in Oxfordshire is beyond the means of most people wanting to buy.  
>  
>  
>  
>  
> This e-mail (including any attachments) may be confidential and may contain legally privileged information. You should not disclose its contents to any other person. If you are not the intended recipient, please notify the sender immediately.  
>  
> Whilst the Council has taken every reasonable precaution to minimise the risk of computer software viruses, it cannot accept liability for any damage which you may sustain as a result of such viruses. You should carry out your own virus checks before opening the e-mail (and/or any attachments).  
>  
> Unless expressly stated otherwise, the contents of this e-mail represent only the views of the sender and does not impose any legal obligation upon the Council or commit the Council to any course of action..



-----Original Message-----

From: Sue Blackshaw <[REDACTED]>  
Sent: 30 September 2021 16:33  
To: Development Brief <developmentbrief@cherwell-dc.gov.uk>  
Subject: Requirement for indoor sports facilities

CAUTION: This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear designers/policy controllers

There is a shortage of indoor sports facility (as always - everywhere).

Can we expect to see an easy to run indoor provision which will allow for two netball courts (each 100ft x 50ft) with 6ft run-off. Touch of luxury would be a viewing gallery.

Only one facility - Radley - in the entire county can do this.

Sincerely

Sue Blackshaw

**From:** Councillor Ian Middleton <Ian.Middleton@Cherwell-DC.gov.uk>  
**Sent:** 22 September 2021 23:30  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Subject:** Response to consultation on development briefs for LPPR sites PR9 and PR7b

Please find attached my response to this consultation

Kind regards

**Ian Middleton**

Oxfordshire County Council Member for Kidlington South Division  
Cherwell District Council Member for Kidlington East Ward  
Kidlington Parish Councillor (Exeter Ward)  
Gosford & Water Eaton Parish Councillor  
Yarnton Parish Councillor

**Website** - [www.middletongreen.org](http://www.middletongreen.org)

**Facebook** - [www.facebook.com/ianmiddletongreenparty](https://www.facebook.com/ianmiddletongreenparty)

**Twitter** - [http://twitter.com/IanMiddletonX](https://twitter.com/IanMiddletonX)

### **Comments on PR 9 and PR7b**

In relation to the consultation on development briefs for both of these sites I would like firstly to endorse the responses submitted by Yarnton and Begbroke Parish councils on site PR9 and Gosford and Water Eaton and Kidlington Parish Councils on site PR7b.

I would also add the following personal comments as parish, district and county councillor for both areas.

### **Sustainable building standards**

I note on both sites there are numerous nods towards low carbon building standards, although there are no firm commitments towards any of the recognised standards on either domestic or commercial properties such as BREEAM and Passivhaus.

In view of the fact that these developments will largely be undertaken during the period covered by the climate emergency motions of all associated councils at all levels of local government, it would seem appropriate for these standards to be adopted.

I'm aware that the policies within the current local plans are relatively weak on these matters and are largely advisory, but I still feel it would be reasonable for the council to hold developers to a higher standard in terms of sustainable development.

This could also include aspirations towards car free environments as well as a more focussed approach to active travel and modal shifts. These are all things that are usually included in planning applications, but it would be good to actually see them acted on.

### **Biodiversity**

Likewise the proposals regarding biodiversity enhancement should be more stringently applied, along with ongoing monitoring of these aspects. It is often the case that biodiversity improvements are aspired to, but very little is done to ensure that they are maintained long term. It would be good to see some sort of program included in the brief to remedy this.

### **Joined up developments**

These sites represent two parts of the overall development scope of the LPPR and as such there should be an effort to ensure that the infrastructure enhancements are made contiguous between each area. These should include health and education provision as well as transport.

### **Health and education**

It's notable that local health agencies are not actively included as consultees on these briefs which is surprising. Equally there seems to be a lack of an overall vision for education provision on both sites with regards to the popularity of existing local schools.

It's clear from my discussions with local parish councils that they would rather see existing local schools enhanced and improved than have new schools provided. Whilst it's likely that some new provisions will be required in strategic locations, schools like Gosford Hill should receive a good proportion of any developer contributions to ensure that it is able to cope with increased intakes. Likewise in Yarnton there should be additional funding for the expansion of the William Fletcher school.

### **Traffic management**

It's clear that this is going to be significant challenge both during the development phase and afterwards. Local roads are already over-capacity and the closure of the Sandy Lane crossing is likely to increase congestion on the A44. A great deal more thought needs to be given to these aspects, again as part of a joined-up plan.

Considering the likely length of the building phases on both these sites, more consideration should be given to the handling of delivery of materials and manpower, as well as the likely impact on local roads as a result. Particularly in areas like Yarnton where there are proposals to remove large areas of the sloping section of the PR9 site to accommodate a playing field, there needs to be careful planning and management for the removal of spoil. This should be backed up with monitoring of these arrangements to ensure that local roads are not impacted by the spreading of debris as a result.

### **Pedestrian Crossings**

These are vital pieces of infrastructure and should respond to local need.

Particularly in Begbroke, a crossing over the A44 should be an essential element in any local walking and cycling plans. The village has been lobbying for such a crossing on what is a dangerous road for many years. The new development both increases the need for this as well as providing a potential source of funding via S106 contributions. It's notable that there is no mention of such a crossing in the PR9 brief and this should be remedied as a property in the document.

### **Sports facilities**

There appears to be no indoor sports facilities planned for the PR9 area. This seems to be predicated on the idea that people from that area will go to Kidlington to use facilities there, possibly enhanced and improved as a result of developments in areas like PR7b and other surrounding projects.

It would be preferable for more comprehensive indoor sports and recreation facilities were provided around the Yarnton and Begbroke areas to balance out the offer and demand for these. This is particularly important given that the closure of Sandy Lane is likely to increased journey times to Kidlington and divide these communities further.

### **Flooding**

This is a vital consideration in both areas, but moreover on site PR9 where Yarnton is now seeing regular flooding events, often associated with run off from Spring Hill. The Yarnton Flood resilience group has produced and submitted a detailed response on these matters and I would endorse this wholeheartedly. The group has done an amazing amount of valuable work in the area since being formed last year and I would hope that their views would be fully incorporated into the final brief.

I am also aware that Thames Water have considerable concerns about the impact in their network that the development on PR9 is likely to have. I understand they are not statutory consultees on these projects, but I would urge the council to seek their views on these matters as part of the final drafting of these briefs.

### **Ongoing consultation and engagement**

Given that the development phases are likely to be prolonged on both sites (and others within the area) I would urge the council to set up a local forum to include councillors at all levels of local

government, as well as resident representatives to provide feedback to local authorities and the developers about any issues that may arise.

Such arrangements should ideally be enshrined in the development briefs to ensure that developers commit and engage with them at all stages with the expectation that they will respond to any local concerns.

Whilst local councillors will of course be the ultimate touchpoints for residents in many cases, it would be a valuable resource to have such a forum to allow direct and responsive contact between the existing local community, the developers, the local authorities and new residents as these communities evolve and ultimately become vastly different environments.

I would suggest that these arrangements are formalised as part of the development briefs on all sites within the LPPR.

**Ian Middleton**

Oxfordshire County Council Member for Kidlington South Division  
Cherwell District Council Member for Kidlington East Ward  
Kidlington Parish Councillor (Exeter Ward)  
Gosford & Water Eaton Parish Councillor  
Yarnton Parish Councillor

To whom it may concern,

I am very disappointed to hear about the outcome in the court case in relation to this development (PR9) and complete disregard to supposedly protected greenbelt land. I still dispute the assessment methods used in calculating the 'unmet housing need' in Oxford, and the fact that other brown sites have not been considered. I am still very concerned about the increase pressure this development will put on the transport infrastructure into Oxford, as well as destroying the character of Yarnton and our sense of identity.

However, given that these concerns have so far been ignored, I now wish to take this opportunity to have my views listened to on the proposed Draft Development Plan for PR9.

I live at 127 Rutten Lane with my husband and two young children, where our garden backs on to this proposed development. As the attached image shows, this development to going to totally change our view and feeling of being connected to the countryside. We absolutely love living next to this field and it was a key factor when deciding to buy our house 5 years ago. To think we will be losing this is very upsetting.

However, if this development is unavoidable, I wish to make the following 3 main requests:

1. Please provide a path from the rear of the properties along the western edge of Rutten Lane, to provide easy, direct access to the green corridor so that we can continue to enjoy the countryside without having to make a significant walk to an alternative access point. This simple addition to the plan would make a huge difference to us.
2. The plan highlights that the noise from the school playing field is seen as an issue to houses on Rutten Lane. The mitigation for this is some sort of acoustic barrier. I am assuming this will be some sort of ugly high fence. However, it appears that noise pollution for the new houses on the development are being dealt with by providing green spaces such as the allotments and the green corridor. It seems to be very unfair and unacceptable that no such allowances seem to be in place for our existing houses. Please provide us with a similar green space separating the rear of the existing properties/gardens from the school playing fields to mitigate any sound pollution, not an unsightly barrier. At the very least, we would prefer to have hedging instead of a large fence.
3. I wish to request that compensation is made to residents where our view is being taken away from us. This is very likely to reduce the value of our homes. This will also allow us make any changes to our gardens to compensate for this development (e.g. adding additional trees or changing fences to shield the view of the new development.)

Additionally I would like to request:

1. Please provide confirmation that flood risks are full determined before plans are progressed further. Section 6.5.4 states that this has not yet happened, and considering the issues our village have experience with flooding so far, this is unacceptable.
2. Please ensure that construction traffic assesses the site via the A44 and not Cassington road and Rutten Lane. Rutten Lane is already a very busy road with a primary school on it.

Thank you for consulting with us regarding these plans, I sincerely hope that our views are taken seriously, as this is something that massively affects where we live. I would be happy to talk in person about anything I have raised, and also happy if anyone would like to see the plot from the perspective of our garden.

Kind regards,

Richard Quinnell







Sent by email: [DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk)

[thameswaterplanningpolicy@savills.com](mailto:thameswaterplanningpolicy@savills.com)

0118 9520 500

17 September 2021

## Cherwell - Draft Development Briefs

Dear Sir/Madam,

Thames Water are the statutory water supply and sewerage undertaker for the Cherwell District Council area, and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. Thames Water wish to make the following comments pertaining to the draft development briefs for Site PR7b: Land at Stratfield Farm, Kidlington and Site PR9: Land West of Yarnton.

### General Water and Wastewater Infrastructure Comments

New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the National Planning Policy Framework (NPPF), February 2021, states: “**Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...**”

Paragraph 28 relates to non-strategic policies and states: “**Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...**”

Paragraph 26 of the NPPF goes on to state: “**Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...**”

The way water and wastewater infrastructure will be delivered has changed. Since the 1st April 2018 all off site water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Strategic water and wastewater infrastructure requirements will be funded through water companies’ investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.

It is important not to under estimate the time required to deliver necessary infrastructure. For example to understand, design, and deliver local network upgrades can take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Implementing



new technologies and the construction of a major treatment works extension or new treatment works extension or new treatment works could take up to 10 years.

Thames Water has limited powers under the Water Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. In some circumstances it may be necessary to phase development in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding, pollution of land, and water courses and / or issues with water supply in the form of no or low water pressure. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme.

### Section 7.1

Section 7.1 refers to the information required to accompany planning applications including Flood Risk Assessments, Drainage Assessments including Water Infrastructure Capacity.

Thames Water offer a free pre-planning service which is available for developers and land owners to discuss their proposals. The following text could be inserted to encourage developers to engage with Thames prior to submitting a planning application:

*“Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.*

*Thames Water encourages developers to use their free pre-planning service (<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>). This service can tell developers at an early stage if there will be capacity in Thames Water and/or wastewater networks to serve their development, or what they will do if there is not.*

*The developer can then submit this communication as evidence to support a planning application and Thames can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes.”*

### Site Specific Comments

Please find enclosed a table setting out individual comments for the proposed site allocations.

We hope this is of assistance. If you have any questions please do not hesitate to contact Stefania Petrosino on the above number.

Yours sincerely,

**Thames Water Utilities Ltd**

Site ID	Site Name	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water	Water Response	Waste Response
55030	PR7b Land at Stratfield Farm	128304	1.49	120	42000	1.46	120	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .	Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
55029	PR9 Land West of Yarnton	577368	6.68	540	189000	6.56	540	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .	Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered

**From:** Bob Sharples <Bob.Sharples@sportengland.org>  
**Sent:** 09 September 2021 11:14  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Subject:** Site PR9: Land West of Yarnton - Draft Development Brief

Good morning,

Thank you for inviting Sport England to comment on the draft development brief for Site PR9 – land west of Yarnton. I have reviewed the document and would make the following observations.

- Consideration should be given to off-road cycle routes within the community woodland and local nature reserve. I would draw your attention to Sport Scotland's guide to project development for mountain bike trails and training facilities <https://sportscotland.org.uk/facilities/design-guidance/outdoor-facilities/guide-to-project-development-for-mountain-bike-trails-and-training-facilities/>
- I would also advise the need to ensure good connectivity in areas to be used by the public and to have low level lighting for safety. This will encourage those feeling anxious about taking informal exercise be it walking or running to continue to go out in the twilight hours. Also the introduction of trim trail equipment should be considered and signage to indicate length of walk, again to encourage informal activity.
- P51 – para 6.5.3. Sport England supports the principle of off-site contributions rather than onsite towards new and improved sports facilities, but this needs to be backed up with a robust and up to date strategy.

There should be contributions towards both indoor and outdoor facilities. Based on 540 dwellings I estimate the population to be between 1350-1890 persons (2.5 -3.5 occupiers per dwelling). Therefore the level of contributions toward built facilities based on Sport England's Sports Facility Calculator are: <https://www.activeplacespower.com/reports/sports-facility-calculator> between £563,559 and £788,982. I accept that CDC may use other occupancy rates but the principles sound and has been tested at Public Inquiries successfully over the years.

*The SFC results presented below are based on the following criteria:*

<b>Area of Interest:</b>	<b>Cherwell</b>	<b>Population:</b>	<b>1,350</b>
<b>Population Profile:</b>	<b>Cherwell</b>	<b>Date generated:</b>	<b>09/09/2021</b>
<b>Build Costs:</b>	<b>Q2 2020</b>	<b>BCIS:</b>	<b>June 2020</b>
<b>Population:</b>	<b>Population: Projection for 2020, based on 2011 Census data and modified by 2018-based Subnational Population Projections for Local Authorities. Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.3.0. London boroughs modified by GLA 2018-based Demographic Projections - ward projections, SHLAA-based, © Greater London Authority, 2020.</b>		

*Facility Requirements:*

Artificial Grass Pitches	
Demand adjusted by	0%
Pitches	0.04
vpwpp	28
Cost if 3G	£39,048
Cost if Sand	£35,516

Indoor Bowls	
Demand adjusted by	0%
Rinks	0.09
Centres	0.02
vpwpp	15
Cost	£36,392

Sports Halls	
Demand adjusted by	0%
Courts	0.37
Halls	0.09
vpwpp	109
Cost	£236,899

Swimming Pools	
Demand adjusted by	0%
Square meters	13.86
Lanes	0.26
Pools	0.07
vpwpp	84
Cost	£254,752

The SFC results presented below are based on the following criteria:

<b>Area of Interest:</b>	<b>Cherwell</b>	<b>Population:</b>	<b>1,890</b>
<b>Population Profile:</b>	<b>Cherwell</b>	<b>Date generated:</b>	<b>09/09/2021</b>
<b>Build Costs:</b>	<b>Q2 2020</b>	<b>BCIS:</b>	<b>June 2020</b>
<b>Population:</b>	<b>Population: Projection for 2020, based on 2011 Census data and modified by 2018-based Subnational Population Projections for Local Authorities. Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.3.0. London boroughs modified by GLA 2018-based Demographic Projections - ward projections, SHLAA-based, © Greater London Authority, 2020.</b>		

Facility Requirements:

Artificial Grass Pitches	
Demand adjusted by	0%
Pitches	0.05
vpwpp	40
Cost if 3G	£54,667
Cost if Sand	£49,722

Indoor Bowls	
Demand adjusted by	0%
Rinks	0.13
Centres	0.02
vpwpp	21
Cost	£50,949

Sports Halls	
Demand adjusted by	0%
Courts	0.52
Halls	0.13
vpwpp	153
Cost	£331,659

Swimming Pools	
Demand adjusted by	0%
Square meters	19.40
Lanes	0.37
Pools	0.09
vpwpp	118
Cost	£356,652

NB don't forget contributions to playing fields.

- P55 – there is a statement that *no formal requirement for the playing fields* at the school. This disappointing and I think it is in conflict the aim of creating healthy place shaping. There should be opportunities for the primary aged children to use their school playing fields to pursue formal sport which is age appropriate rather than travel to Kidlington or another town.

I would be grateful if we could be kept informed on the development brief.

Finally I would draw you attention the Active Design which jointly published by Public Health England and ourselves. I believe there are some good practise which can be gleamed from the document to enhance the development brief:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

Kind regards

Bob

**Bob Sharples** RIBA MRTPI  
Principal Planning Manager - South Team

**T:** 07830 315030



**From:** Nicky Warden <nickywarden@bbowt.org.uk>

**Sent:** 21 September 2021 12:54

**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>

**Subject:** Cherwell District Council Local Plan Partial Review Draft Development Briefs - Site PR7b & Site PR9

[DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk)

By email only

**Cherwell District Council Local Plan Partial Review Draft Development Briefs (Site PR7b: Land at Stratfield Farm, Kidlington & Site PR9: Land West of Yarnton)**

Dear Sir/Madam

Please find attached our comments on the above Development Briefs.

Please confirm receipt of our response.

Please contact us should you wish to discuss this further.

Kind regards

Nicky Warden

Public Affairs and Planning Officer  
Berks, Bucks & Oxon Wildlife Trust  
01865 775476  
The Lodge, 1 Armstrong Road, Littlemore, Oxford, OX4 4XT

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[DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk)

By email only

**Cherwell District Council Local Plan Partial Review Draft Development Briefs (Site PR7b: Land at Stratfield Farm, Kidlington & Site PR9: Land West of Yarnton)**

**BBOWT Response – 22 September 2021**

**Introduction**

Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on the proposed content of Development Briefs for the following sites:

- PR7b Land at Stratfield Farm, Kidlington
- PR9 Land West of Yarnton

Established in 1959, BBOWT has now grown to be the largest and most influential voluntary conservation organisation in the region concerned with all aspects of nature conservation. BBOWT has over 50,000 members and 1,800 volunteers. We own or manage 87 nature reserves, totalling over 2,600 ha.

As a wildlife organisation, our comments will be restricted to matters associated with the protection and enhancement of biodiversity.

To avoid repetition and a very lengthy response we have written firstly overarching comments applicable to both Development Briefs and then site-specific comments relevant only to individual Development Briefs. In the event that the response is split up to be referred to by staff working on individual development briefs please ensure that the overarching comments are attached to each of the development brief comments.

We note that the layouts in the development briefs are indicative only and we reserve the right to comment on specific planning applications as they are brought forward. This includes reserving the right to object to future planning applications if we have concerns over impact on biodiversity, or the level of net gain in biodiversity.

**Overarching comments applicable to both Development Briefs**

The scale of development, with 660 homes proposed across the two sites, is such that it will inevitably have a major impact in terms of the additional number of people living in the area, and their vehicles and vehicle movements. We cover the likely impacts on wildlife and green infrastructure and make suggestions for what could be required of developers in relation to these.



## Scale of development

Paragraph 175 of the National Planning Policy Framework (NPPF 2021) states that *"Plans should... take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape-scale across local authority boundaries."* Paragraph 179 of NPPF 2021 states that *"To protect and enhance biodiversity, plans should... a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation, and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species,; and identify and pursue opportunities for securing measurable net gains for biodiversity."*

We believe the scale of development proposed should be matched by large-scale habitat restoration and enhancement. We note and welcome that within the developments proposed for the Development Briefs there are ambitions for creation of new nature reserves, community woodland and nature conservation areas. We are nevertheless greatly concerned as to the impacts of the developments on wildlife. If the Council is nevertheless minded to proceed with the allocation of these sites for development then there are a number of aspects which will need to be required of developers to minimise the impact on wildlife.

## Biodiversity Improvement and Management Plan

We welcome the requirement for a Biodiversity Impact Assessment be submitted as part of the planning application for both sites and a supporting Biodiversity Improvement and Management Plan and note that measures are to be incorporated into the development schemes to achieve a minimum of 10% biodiversity net gain.

## Light pollution

We note that PR7b requires measures "to minimise light spillage and noise levels on habitats and wildlife corridors including to maintain connectivity for nocturnal species in an east-west direction and the maintenance of a dark canal corridor." and PR9 requires appropriate lighting to minimise impact on wildlife.

We are concerned that these requirements may still result in significant light pollution arising from the developments, both static lighting as well as lights from vehicles. We think that there is an opportunity to consider lighting strategically to make this area an exemplar in terms of minimising light pollution, in terms of the type of lighting used, how much is used and where it is used, as well as design of routes to avoid light pollution into wildlife-rich areas of the sites, from fixed lights as well as vehicles, particularly where there are likely to be species of wildlife affected by light at night, e.g. bats and badgers. A key principle will be to keep dark corridors where bats are using lines of trees and hedgerows as flight paths. Lighting will have to be managed carefully to ensure it is of a low spill variety, a spectrum that minimises impacts on birds, bats and insects and directed into the development. We suggest that there should be conditions or covenants to control the type, power of and direction of security and outside lighting that can be installed on homes and other buildings.

### Access vs. undisturbed areas

In order to provide the substantial benefits for wildlife that will be needed to achieve a net gain in biodiversity that is focused primarily on site then there should not be public access across the entire area of the green infrastructure. Zoning, and a 'hierarchy' of access levels of the combination of all green areas should be carefully planned, including consideration of main paths/cycle routes (with an appreciation of the most obvious routes that people are likely to want to follow: 'desire lines'). There should be informal recreation along a network of paths and openly accessible spaces included within a mosaic of areas that are closed off by appropriate use of hedgerows, screens, fencing and ditches. Broad zones might help keep some larger restricted access nature conservation blocks 'quiet' rather than fragmenting areas too much. This would be simpler zoning for residents and visitors to understand and will allow wildlife to thrive and be observed from paths. The need to have some areas without direct public access is supported by a research report published by Natural England 'Is the management of Local Wildlife Sites affected by the urban fringe?' (NERR063) <http://publications.naturalengland.org.uk/publication/6134796821463040>

### Green infrastructure

We note that the sites will "deliver significant areas of new publicly accessible green infrastructure (GI) and habitat which form part of strategic GI corridors".

It is important that details are provided for how Green Infrastructure will be managed in the long-term. We consider long-term should mean for ever. Once developed it can be reasonably assumed that the developed land will have buildings on forever. Therefore, the GI should be retained forever and with an endowment fund to pay for its management forever.

### Proposals for wildlife management and maintenance

Our view is that the GI including habitats for wildlife should be managed in perpetuity (e.g. forever) and proposals should recognise this. Long-term management plans and effective, sensitive management (with regular reviews) will be needed for all sites - they all have green infrastructure and wildlife habitat. To ensure management lasts for as long as the built environment is built up (e.g. likely to be forever) then an endowment fund will be needed to ensure that management costs can be covered.

Ideally, there would be a funded officer-role to coordinate and oversee this. This could be alongside or sharing a role as a community engagement officer. This role could for example be delivered by an officer in an external organisation with appropriate experience (e.g. such as a member of Cherwell District Council's Biodiversity Partnership).

### Integration of wildlife features into the built environment

While we welcome the wording "The scheme is to include provision of in-built bird and bat boxes, wildlife connectivity between gardens and the provision of designated green walls and roofs where viable.", we think that this should be amended to: "A scheme for the provision of exemplary biodiversity in the built environment, including street trees with large canopies, wildflower road verges, wildlife connectivity between gardens, provision of designated green walls and roofs, and bird and bat boxes integrated into buildings ." The order is important and the current order suggests that bird and bat boxes are more important than wildlife connectivity. The reality is that the provision of natural wildlife habitat, including within the built environment, is much more valuable for wildlife than bird and bat boxes.

The scale of development proposed is such that each scheme should be exemplary in terms of integrating biodiversity features. The Wildlife Trusts have published 'Homes for people and Wildlife: How to build housing in a nature-friendly way' which sets out what a good, nature-rich housing development looks like. See: [https://www.wildlifetrusts.org/sites/default/files/2018-05/homes\\_for\\_people\\_and\\_wildlife\\_lr\\_-\\_spreads.pdf](https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf). According to this, 'All housing developments must result in:

- A measurable improvement for wild species and habitats, which means
  - Avoiding any loss or damage of wildlife sites
  - Designing in existing habitats
  - Creating new habitat
  - More than compensating for any habitat that is lost
- All residents having lasting access to nearby nature"

Research shows that green roofs can provide valuable habitats for wildlife (<https://livingroofs.org/biodiversity-and-wildlife/>). The extent of biodiversity will depend on the type of green roof installed. Sedum roofs benefit a limited range of invertebrates and provide foraging for pollinators when in flower. Ecologically designed extensive green roofs can provide good habitat for wildlife, but there are limitations in terms of replicating habitat at ground level due to shallow depth of soils and the drying effect of wind and sun. According to [www.livingroofs.org](http://www.livingroofs.org), a good green roof designed for biodiversity should include a varied substrate depth planted with a wide range of wildflowers suitable for dry meadows.

Wildlife connectivity between gardens can be achieved by allowing gaps in fencing and walls for hedgehogs and other small animals to roam, e.g. hedgehog streets in Kirtlington. This can be used to raise awareness of wildlife within the community.

Additional information on appropriate enhancements within the built environment can also be found in 'Biodiversity Positive: Eco-Towns Biodiversity Worksheet, produced by Town and Country Planning Association, Communities and Local Government, and Natural England', downloadable from: <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=2e0ffaf8-24b1-45fe-a02f-505a06d72ff2>

The table below (prepared by BBOWT) sets out features in developments to encourage biodiversity, and their associated benefits for people:

	Biodiversity benefits	Reduces urban heat island effect	Reduces air pollution	Reduces water run-off
<b>Houses and Gardens:</b>				
Gardens: Fruit trees in each back garden; Wildflower turf making up part of lawn in each garden; Log piles; Hedgerows making up at least one boundary; Garden walls with overwintering shelter for insects	✓	✓	✓	✓
Green roofs on garages and public buildings	✓	✓	✓	✓
Green walls	✓	✓	✓	✓
Built in bird boxes including swift bricks, swallow and house martin and garden birds.	✓			

Built in bat boxes, bricks and lofts – suitable for crevice dwellers and roof void dwellers.	✓			
<b><u>Street network and small green spaces:</u></b>				
Street trees – tree lined streets; woodland copses.	✓	✓	✓	✓
Wildflower rich road verges and green corners etc. with loggeries, hibernacula, bug hotels	✓	✓		✓
Climbing plants on fences and walls	✓	✓	✓	✓
Any shrubs chosen to maximise: berries for winter bird food; flowers for pollen and nectar.	✓			
SUDS schemes including biodiversity	✓	✓	✓	✓
<b><u>Green Spaces</u></b> (In addition to large scale habitat creation and management above):				
Wildflower edging / shrubs around sports pitches, play equipment, kick-about areas.	✓	✓		✓
Hedgerows and buffers: management for wildlife	✓	✓	✓	✓
Long grass / bare ground / rockeries / hibernacula for reptiles	✓	✓		✓
Clean-water wetlands / ponds / ditches with surrounding wildlife grass habitat for amphibians – can be part of SUDS and independent of SUDS.	✓	✓		✓
Woodland	✓	✓	✓	✓
Network of green and blue corridors without lighting	✓	✓	✓	✓
Allotments	✓	✓		✓

### Protection of habitats during construction through to long term management plans being in place and active

We would expect that wildlife-rich areas will be protected within developments, during construction and afterwards, during occupation. This will require long-term monitoring, and sensitive management to a plan, with developer-funded oversight.

We welcome the requirement to retain mature trees and manage these sensitively. Best practice measures (for example, as set out in 'BS 5837:2012 Trees in relation to design, demolition and construction. Recommendations') should be required during construction, including establishing Root Protection Areas. Buffer zones should be specified for hedgerows, particularly, but not exclusively, for old, rich hedgerows, as well as for any historic ditches.

### Protection of habitats and protected species

BBOWT would expect any planning applications which come forward on each site to be judged robustly against the biodiversity and green space elements of the 'Cherwell Local Plan 2011 – 2031 (Part1) Partial Review – Oxford's Unmet Housing Need (Sept 2020)' and the National Planning Policy Framework 2021, with reference in particular to the protection of:

- Special Areas of Conservation (SACs)
- Sites of Special Scientific Interest (SSSIs)
- Local Wildlife Sites (LWS) and proposed Local Wildlife Site (which have the same protection level)
- District Wildlife Sites (DWS) and proposed DWS
- Ancient woodland and other irreplaceable habitats
- Priority habitat (under Section 41 of the NERC Act)

- Legally protected and notable species Priority species (under Section 41 of the NERC Act)
- Wild bird habitat (as covered under paragraph 9A “Duties in relation to wild bird habitat” of the Conservation of Habitats and Species (Amendment) Regulations 2012)
- Lower Cherwell CTA
- Oxford Canal Conservation Area

The impact on protected species, designated sites and any Species and Habitats of Principal Importance for Conservation in England (as listed under Section 41 of NERC Act (2006)) that may be affected will need to be assessed in relation to any planning applications on these sites. A full suite of habitat and species surveys should be carried out. The species surveys should address priority and notable species in addition to protected species. Surveys should include breeding bird surveys and, on the arable land, surveys for arable plants.

The most recent ecological records should be sought from TVERC (Thames Valley Environmental Records Centre) in addition to ecological surveys being carried out in the right survey season.

#### Buffer zones, design and layout

Both sites are adjacent to District Wildlife Sites, and adjacent to or within the Lower Cherwell Conservation Target Area, and both are upstream of sensitive wildlife sites including a SAC and further LWS, DWS and SSSI. There should be clearly identified and specified buffer zones provided around these. Local Wildlife Sites should have a buffer zone of at least 50m. Hedgerows should have a buffer zone of at least 10m. Veteran trees should have a minimum buffer of 5m greater than their natural canopy area.

The aim should be that buffer zones are themselves biodiverse-rich priority habitat and certainly that these are planned and managed so as to contribute greatly to the diversity of habitats on site. We think that the place-making principles should include a requirement that development be arranged so that back gardens are not directly adjacent to LWS, DWS, SSSIs or any buffer zones. This will minimise the impacts of dumping of garden (and other waste) over fences and of the installation and use of private access gates.

#### Compensation for impact on farmland and other birds

DEFRA has provided guidance to competent authorities (including local authorities) on how to comply with the legal requirements of the [Conservation of Habitats and Species Regulations 2010](#) as amended in paragraph 9a of the [Conservation of Habitats and Species \(Amendment\) 2012 Regulations](#)). The guidance is available at: <https://www.gov.uk/guidance/providing-and-protecting-habitat-for-wild-birds>

We are aware of populations of skylark and fieldfare in the arable areas and it is highly likely that there will be populations of other farmland bird priority species. Off-site compensation should be provided for farmland birds where these are impacted (and on-site compensation where this is possible – substantial nature reserves areas with zoning to control public access would be needed in this case since many of these species are not suited to built-up areas or disturbance by people, dogs and cats) to ensure that populations are maintained in line with the above quoted legislation. Such compensation is commonly required within Cherwell District, as evidenced for example by the NW Bicester Eco-Town development.

## Conservation Target Areas

Conservation Target Areas (CTAs) identify some of the most important areas for wildlife conservation in Oxfordshire, where targeted conservation action will have the greatest benefit. Both sites adjoin or are close to the *Lower Cherwell Conservation Target Area*.

Their Oxfordshire Biodiversity Action Plan target habitats for creation should guide the habitats to be created on the proposed development sites. Oxfordshire Biodiversity Action Plan Targets associated with this CTA:

1. Lowland meadow – management, restoration and creation.
2. Floodplain grazing marsh – management, restoration and creation (for breeding waders in particular).
3. Lowland Fen (including swamp) – management and restoration.
4. Reedbed – management and creation.
5. Rivers – management and restoration (including management for water vole).

Note: “Management” implies both maintaining the quantity, and maintaining and improving the quality of existing BAP habitat and incorporates the following target definitions: “Maintaining extent” and “Achieving Condition”.

## Site-specific comments

### **Site-specific comments: PR7b - Land at Stratfield Farm, Kidlington**

120 homes are proposed for this site, on 5 hectares of a 10.5-hectare site. Part of the site adjoins the Lower Cherwell Conservation Target Area. It also includes a traditional protected orchard and adjoins both the Stratfield Brake District Wildlife Site and Oxford Canal, with the Meadows West of the Oxford Canal LWS.

We welcome the intention to, “provide a multi-functional green infrastructure network providing a range of ecosystem services:

- A Nature Conservation Area including habitat areas with limited public access, and publicly accessible informal open space
- A community orchard and associated community food growing garden
- Publicly accessible woodland / wetland
- Retained and enhanced hedgerow corridors and trees
- A public LAP/LEAP play area
- Drainage features and wetland
- Private gardens including the traditional orchard

However, we have concerns that increased public access to the ‘modern’ orchard is likely to result in a decline in condition of this priority habitat. It is estimated that since 1950 overall orchard area in

England has declined by 63% [Traditional Orchard Project in England: The creation of an inventory to support the UK Habitat Action Plan - NECR077 \(nepubprod.appspot.com\)](https://nepubprod.appspot.com/). We recommend the orchards should be carefully managed to prevent negative impacts to this priority habitat.

The stretch of canal immediately to the west and north of the site is a Local Key Area for water voles. The area is regularly surveyed and monitored by BBOWT's Water Vole Officer and there should be an aim to ensure suitable habitat at the canal edge and to take any opportunities that arise to enhance the habitat for water voles.

The existing biodiversity assets include two ponds and ditches / drains. The area to the west of the site is richest in biodiversity and should ideally be managed in such a way, for example by planting and path/desire line management, so as to reduce recreational impact on some parts of the site. Biodiversity could be greatly enhanced by conservation grazing in some areas. The aim should be to improve the western side of the site to be of sufficient biodiversity value to become an extension of the District Wildlife Site. This area of Kidlington with the existing bridge over the canal from the southwest corner of the DWS is already very popular with walkers including dog walkers but is heavily impacted by such access. The protected wet areas of the DWS are excellent, especially the section bordering this development site.

Efforts should be made to minimise the footprint of the new canal bridge, and the wider impacts during construction. We would recommend the advice of BBOWT's Water Vole Officer is followed.

#### **Site-specific comments: PR9 Land West of Yarnton**

540 dwellings are proposed for this site, built on 25 hectares of land within a 99-hectare site. The site is currently predominantly farmland: arable and grassland, including important ridge and furrow areas plus valuable wet grassland field, and double-hedged greenways with associated ditches, all valuable habitats. Begbroke Wood, an ancient woodland and Local Wildlife Site lies to the north-west. Frogwelldown Lane, a District Wildlife Site designated historic greenway and a public right of way forms the south west boundary of the site.

We welcome the intention to create, "An enhanced green infrastructure network..., providing connected wildlife corridors through the development site and enhancing wildlife connections with Begbroke Woodland, and along Frogwelldown Lane (which is a District Wildlife Site) and Dolton Lane."

Key features to include:

- informal parkland area on 24.8 hectares of land, that incorporates a new Local Nature Reserve
- 7.8 hectares of community woodland
- 39.2 hectares retained for agricultural use
- connected green corridors including the retention and enhancement of existing hedgerow corridors and trees
- habitat buffer to Begbroke ancient woodland
- public play spaces
- 0.49 hectares of community allotments
- retention of drainage features and new sustainable drainage features
- private gardens"

We would welcome further discussions on the potential for wildlife habitat creation within the areas of retained green space. We consider that there is great potential here for the creation of a large-scale nature reserve within this area, with zoning so that public access is provided in some areas



but managed in such a way that some areas do not have public access – see earlier section on this in the generic part of our response for more details on this.

Recommended habitats within the nature reserve include species-rich grassland, including wet grassland if applicable, ponds and scrapes, hedgerows, scrub and woodland.

Aerial photography and GIS suggest that the land is currently predominantly arable farmland, with some grassland, bounded by hedgerows and lines of trees. The Ecology Study identifies the grassland as semi-improved / improved in nature with some remnant ridge and furrow, broad-leaved woodland belts associated with historic rights of way and some potential veteran trees.

The mature and veteran trees present are considered to be of high ecological value and veteran trees are considered irreplaceable under the NPPF. In our opinion there are some great trees, including an excellent pollarded oak in the hedge line running eastwards from Frogwelldown Lane towards the build area, high on the hill. All mature and veteran trees should be retained and provided with above minimum buffer zone, as should all hedgerows. There are gaps in the hedgerow either side of the oak. These should be reinstated to avoid trampling, and for connectivity, unless there was some halo clearance, although it is unlikely a low hedge would encroach. We recommend that pathways are kept well away from large trees such as this oak, with wide buffer zones, both for habitat, and so that any concerns about aging oaks near footpaths do not lead to early crown reduction or felling.

While we welcome proposals for community woodland which can provide opportunities for volunteers and visitors to learn about the local environment and conservation, we have some concerns, subject to further work, which we would like to discuss about the exact area proposed for community woodland since it includes ridge and furrow in that area. Ridge and furrow is often associated with species-rich habitat and good soil ecology. It is rare in the district and much has been lost. In addition to many of the other proposed locations for planting we would welcome more tree planting alongside the existing exterior hedgeways, including Frogwelldown.

We would suggest that if some of the wildlife habitat could be near the school then it could be available, if appropriate and if the school desired, for wildlife education.

In addition to protection of trees and hedgerows should be protection of ditches as valuable, old habitats in their own right and linked to the greenways: Frogwelldown and Doulton. Bridges should be built as specific structured access points to reduce ad hoc pathways across the ditches.

We would recommend that all hedgeways be enhanced, particularly linking the greenways to Begbroke Wood and to new woodland strips / blocks wherever they are planted.

We welcome the proposed Local Nature Reserve linked to William Fletcher Primary School. The Local Nature Reserve could be an example of ex-arable reversion with wild flower meadow and grassland for ground-nesting birds.

We are aware of skylarks in this area. This should be considered in the zoning of the open access area as skylarks are vulnerable to disturbance by people and dogs.

We consider it is very important to conserve and enhance the condition of Frogwelldown Lane District Wildlife Site. It has the potential for future consideration as a LWS as it is already of good quality, but currently isolated from similar habitat. This is an opportunity to enhance this DWS - especially with extended good quality linking habitat to the north to link with woodland. But there is



in balance the potential for damage from increased right of way use and disturbance. We would potentially like to suggest an all-weather, accessible route to the east of Frogwelldown Lane right of way in parallel, with a buffer; community woodland planting to protect the DWS from some traffic, and also providing an accessible route while keeping the DWS central pathway open, as it needs to be for its habitats.

We would recommend that gaps should be filled to minimise meanderings through the greenway sides and that maintained dog mess waste bins are provided at intervals, including the start, end and formal access points. We would recommend there be bridge and ditch crossing points to avoid damaging ditchlines.

We are similarly concerned about damage to the adjoining Begbroke Wood LWS, including through highly likely recreational impacts (especially with its spring flower attractions, and being central to a likely highly popular circular walk route near the new build area), plus cat encroachment and predation. This clear potential for damage should be actively minimized through funding towards education/engagement activities providing information about the sensitivity of such sites as well as offering attractive, easily accessible, woodland elsewhere. This may in part be managed through careful design and management of the community woodland areas and the open access land. We refer to our comments above. We are concerned by the ecological consultancy report's suggestion that local residents are much more likely to walk at Blenheim Palace than on the local area's paths and green spaces. We consider it is highly likely that there would be significant increase in the use of local paths and green spaces.

Thank you again for inviting BBOWT to submit comments to inform the development briefs. Please do get in touch if you have any queries.

**From:** clerk@begbrokepc.org.uk <clerk@begbrokepc.org.uk>

**Sent:** 14 September 2021 14:52

**To:** Nathanael Stock <Nathanael.Stock@Cherwell-DC.gov.uk>

**Cc:** Development Brief <developmentbrief@cherwell-dc.gov.uk>; [REDACTED]

[REDACTED] Begbroke Parish Council <clerk@begbrokepc.org.uk>; [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Development Briefs consultation

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Nathan - please find comments from Begbroke parish council.

Regards

Jeff

Jeffrey Wright  
Clerk to Begbroke parish council

<https://www.begbrokepc.org.uk/>

**PR9 Land West of Yarnton - comments and observations**

- a These plans offer very little to Begbroke and difficult to see how the possibility of perhaps a 1000 more residents in houses could improve the village.
- b **A Pedestrian crossing for Begbroke village** is not included in the plans This is a major priority for this village and there is much correspondence on this recorded with Oxfordshire County Council. **There must be a commitment for section 106 monies from the developers.**
- c The current lack of a controlled crossing is also discriminatory to the old, the very young and anyone who is mobility impaired. This need to be addressed in advance of any construction works.
- d Sewage - capabilities of system to cope
- e Increased air pollution - is regular monitoring to take place?
- f Transport Links - no direct bus link - without impractical bus changes, to Oxford Parkway or Water Eaton P&R which has buses to hospitals.
- g Ideas about Dolton Lane are upsetting. The nature of this lovely ancient rural lane is that sometimes it is impassable, but this is what makes it so special. It would be a disaster if it were turned into an urban pathway as shown on Pages 28 and 36. The character of the lane would be lost forever
- h Turning the whole Binfield into woodland rather than just part of it is not a preferred option. It is such a special field for wildlife

- i The speed awareness signs are working overtime now - another reason why a crossing is required.
- j If the proposed new Railway Station is built near, the science Park, surely keeping Sandy Lane open both ways would make sense.
- k No retail provision meaning that all residents must go to a larger settlement such as Kidlington for shopping. The nearest small facility to Begbroke is Budgens Yarnton.
- l Shopping trips will require car journeys either via Langford Lane or Loop Farm if Sandy Lane is closed. People without transport will be stuck especially with one mini-bus trip/week. This must be addressed.
- m Not sure how the development of agricultural land can be considered to 'provide significant ecological and biodiversity gains'. Development and increased population bring disturbance to wildlife including the presence of cat's dogs and rats. Inhabitants to the north of the site would find the facilities in Begbroke e.g., village hall bowling green and playing field closer than that of Yarnton. Funding towards improvement of facilities could be provided. A pedestrian crossing is needed at Begbroke for safe access to these facilities.
- n In item 5.1 there is reference to provision of sports facilities. 1. 'It is the Council's preference that in lieu of on-site formal sports provision an appropriate financial contribution be made towards new and improved facilities at southeast Kidlington'

- o Given that there appears to be an option why not consider developing the playing field and village hall at Begbroke? There is already desire for an all-weather surface multi-sport facility - the current arrangements need improvement, and we have the space. This is likely to be cheaper and has the benefit of developing the social amenities within the village which can also be used by inhabitants of PR9 (and PR8) a pedestrian crossing is needed at Begbroke for safe access to these facilities.
- p The design brief shows no public meeting place/community centre/or hall planned for the new developments. Money should be allocated to improve existing Begbroke facilities at village hall.
- q Allowing traffic on to the A44 at the science park junction will further increase queuing and probably reduce the gaps in traffic through Begbroke making it even more difficult to cross - the current traffic light sensors are also defective.

### PR7 - Comments and observations

Plans for Frieze Farm Sandy Lane is not shown, and not sure it is for the Science Park Development, or ours and Yarnton. Surely 106 money could be used to help fund a bridge at

a Sandy Lane and a crossing for us.

If the proposed new Railway Station is built surely keeping Sandy Lane open both ways would

b make sense.

Can't see why they need a community orchard when there is already a formal orchard - seems just a buzz word to make everyone feel happy. The reality is more likely to be that in a

c few years it will be neglected and a waste of space.

Vehicular access to the roundabout is far from ideal and will push more traffic onto a narrow

d service road. - don't know how southbound traffic will flow.

Part of the brief calls up resin bonded gravel as a surface for roads - not a good idea as once it cracks you can't easily repair it and given the current performance of highways dept the area

e will soon look awful.

Roads need to be wide enough for on street parking and adequate visitor spaces must also be

f provided.

Who is going to cover the costs and be responsible for maintaining the orchard and play

g areas etc?

**From:** Jane Hennell <Jane.Hennell@canalrivertrust.org.uk>  
**Sent:** 17 September 2021 10:06  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Subject:** Cherwell Development brief



Dear Sir

Please find attached a response in relation to the Kidlington Development Brief. We have no comments to make on the Yarnton site.

Kind regards

Jane Hennell MRTPI  
Area Planner



**Canal & River Trust**

Gloucester Waterways Museum, Llanthony Warehouse, The Docks, Gloucester, GL1 2EH



[canalrivertrust.org.uk](https://canalrivertrust.org.uk)

Sign up for the Canal & River Trust Newsletter

[canalrivertrust.org.uk/newsletter](https://canalrivertrust.org.uk/newsletter)

Dear Sir

Thank you for consulting the Canal & River Trust on the design brief for PR7b, land at Kidlington. Please find below our comments. We welcome ongoing and early engagement on this and the other canal side allocations, particularly in relation to the provision of the new bridge which will be a complex matter and require much involvement from the Canal & River Trust. Our detailed comments are set out below.

### **The canal and towpath**

The canal should be considered not as an edge to the site but an integral part of the site which brings unique opportunities to it. The benefits of being located by water are not fully exploited and the towpath is only really mentioned in context of joining PR7b and PR8, rather than a multi-functional green infrastructure asset which leads much further afield, brings sustainable transport, active travel and health and well-being opportunities as well as a multitude of other benefits to not only PR7b and PR8 but to the existing communities.

It is likely that the towpath will require improvement to the north, particularly as a result of the other proposed development locations and a proportionate contribution should be sought.

During lockdown we have recorded increases in use of towpaths in similar areas of up to 600% and this is only likely to continue, particularly where the towpath can provide a pleasant off road commuter route right into the heart of the city. Realistically, residents are likely to use the towpath as a commuting route or for recreational purposes and this is welcomed by the Trust provided that the towpath is suitable for the additional usage, both in terms of surfacing and width. This additional use is likely to take place anywhere between Oxford City Centre (for commuting) and north, perhaps as far as Langford Lane and beyond for commuting, recreation and health and well-being.

The brief mentions at 6.2 that this development will need to improve access to and along the Oxford canal corridor which is welcomed and it is understood that discussions are already taking place with both the Council and Developers relating to towpath improvements.

It would be expected that any improved towpath would be of a standard to the match sections already improved within the Oxford City council area and extending northwards to a location to be agreed. A copy of the specification can be provided on request. It will be a matter for the Council to determine what is proportionate for each development to provide and we would expect a co-ordinated rather than piecemeal approach to ensure that sections are not left unimproved. The Trust's Enterprise Team can work closely with the council on this matter.

We have published a design guide for towpaths, [here](#) but each stretch really needs individual design based on the width available, likely volume of use and need for bank protection and the area. The surfacing will alter dependant on whether the path is urban or rural in nature. Towpath improvement works can cost anywhere between £250 per linear metre and £600 per linear metre if bank improvement and stabilisation is necessary to widen the available space, where there is no existing hard surface to act as a subbase or where project costs are particularly high for any number of reasons. We have not visited the area to assess the towpath and so can only provide generic guidance.



The towpath may require widening and bank stabilisation to allow a suitable width. This could push the project close to £600 per linear metre. Project set up costs and working practices vary enormously due to savings made by economies of scale, accessibility and delivery issues for plant and machinery and even at times the need to carry out work or carry materials by boat.

Whilst the Trust would not want to see a definite contribution figure referred to, early discussions should take place with the Trust to ensure that the area identified for improvement within any outline application is suitable and realistic.

### **The new bridge**

It is noted that the development must provide land for the bridge landing and access route to it. It is described as an elegant new foot, cycle, and wheelchair accessible bridge over the Oxford Canal, built, connecting the route with the canal towpath and site PR8, with appropriate towpath improvements.

Land within the PR7b site is to be provided to facilitate this access. The exact location and design of the bridge and towpath improvements is dependent on survey and consultation with others, including the Canal & River Trust, and this is to be agreed at outline planning. The bridge could incorporate a sculptural quality as part of any public art on the site.

At the outset it should be made clear that the Trust are not obliged to accept a new bridge over the canal regardless of any requirement in the Local Plan or a development brief. However, we will work with the council and others to facilitate it if a suitable design and location can be agreed and if it has no adverse impact on the navigational safety of the canal or of towpath users.

It is for the council to determine if this development site should make a contribution towards the cost of provision and maintenance of the bridge but as the bridge is not required for navigation purposes, the Trust will not take ownership or maintenance responsibility for the new bridge. We would expect that it be adopted by the County Council to ensure it does not become a long-term liability.

The new bridge will require planning permission, a license from the Trust and DEFRA consent.

As it does not appear that the provision of the bridge will fall to this development no comments have been made on its possible design, but such details can be made available if necessary.

However early discussions with the Trust should be encouraged before the bridge location is shown on any illustrative plans to ensure that our design requirements are understood.

We are pleased to note that the development brief makes it clear that the Trust will want full involvement. We further request that a reference is made to our Code of Practice for works affecting the Trust, which can be found [here](#) although at this stage this may only be relevant to the location of the proposed bridge and its interaction with a new path along the eastern side of the canal.

By providing a link to the relevant guidance in the document multiple requests from different developers requiring detailed guidance. Bridge design is a complex issue, and we would normally expect the design to be properly reviewed by our infrastructure Services team with a cost undertaking to cover the provision of our advice. We will of course comment on anything that comes forward as a planning application but would hope that these matters would be dealt with before an outline application is submitted.

It is suggested that an assessment of the compliance of the proposed bridge location and of the bridge and towpath improvement details against our guidance document is included in the list of required supporting documents in Section 7.

### **Ecological enhancement**

We welcome mention of enhancements for Otter, Water Vole and Great Crested habitats and links within the site and to adjacent areas of habitat including the Lower Cherwell Conservation Target Area and the Meadows West of the Oxford Canal Local Wildlife Site to create a network. We also support mention of measures to minimise light spillage and noise levels and the maintenance of a dark canal corridor.

### **Sport and Recreation**

Finally, there is no mention of the need to consider the creation of water-based sport facilities such as angler platforms and launch locations for paddleboarding and canoeing which could be provided in conjunction with the new path to the east of the canal. This matter requires wider consideration in relation to the other canalside development locations and the level of provision already in the area but could provide additional leisure facilities within the area.

**From:** Mellor, Huw <Huw.Mellor@carterjonas.co.uk>  
**Sent:** 26 August 2021 17:35  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Cc:** Nathanael Stock <Nathanael.Stock@Cherwell-DC.gov.uk>  
**Subject:** Site PR7b: Land at Stratfield Farm, Kidlington - Consultation response Local Plan Partial Review Draft Development Brief

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

Please find attached a response on behalf of Manor Oak Homes Limited in respect of the public consultation on the draft site Development Brief for the above.

I look forward to hearing back from you next with any further updates in relation to this process.

Regards

Huw

Classification L2 - Business Data

**HuwMellor**MRTPI  
Partner

**Carter Jonas**

T: 01865 255166 x3341 | M: 07739 519195 | [carterjonas.co.uk](https://carterjonas.co.uk)  
Mayfield House, 256 Banbury Road, Summertown, Oxford, OX2 7DE

**CHERWELL DISTRICT COUNCIL  
PLANNING POLICY CONSULTATION  
11 AUGUST 2021 TO 22 SEPTEMBER 2021**

**Local Plan Partial Review Draft Development Brief for  
Site PR7b: Land at Stratfield Farm, Kidlington**

**Introduction**

I write on behalf of Manor Oak Homes Limited [Manor Oak] in respect of the above and in response to the invitation through the public consultation process to make all and any comments known.

**Comments**

Manor Oak have worked positively and proactively alongside Cherwell District Council [the Council] from the earliest stages of the initial Development Brief process, through to date to the current time and including specifically on this latest version of the Draft Development Brief [the Brief] now subject to this public consultation.

Manor Oak support the aims and objectives of the Brief in its planned delivery of much needed housing for this part of the District.

Manor Oak intend to submit a due planning application at the soonest opportunity following the adoption of the final version Brief, aligned to the principles and details of that document, with a view to an expeditious delivery of the housing allocated to this site.

**Summary and Conclusion**

Manor Oak support the Council in its Development Brief strategy for this site and would endorse and support any decision taken by the Council in due course to formally endorse and adopt this Brief for the site.

**Huw Mellor MRTPI  
Partner  
Carter Jonas LLP**

26 August 2021

via email : [DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk)

**From:** Councillor Ian Middleton <Ian.Middleton@Cherwell-DC.gov.uk>

**Sent:** 22 September 2021 23:30

**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>

**Subject:** Response to consultation on development briefs for LPPR sites PR9 and PR7b

Please find attached my response to this consultation

Kind regards

**Ian Middleton**

Oxfordshire County Council Member for Kidlington South Division  
Cherwell District Council Member for Kidlington East Ward  
Kidlington Parish Councillor (Exeter Ward)  
Gosford & Water Eaton Parish Councillor  
Yarnton Parish Councillor

**Website** - [www.middletongreen.org](http://www.middletongreen.org)

**Facebook** - [www.facebook.com/ianmiddletongreenparty](https://www.facebook.com/ianmiddletongreenparty)

**Twitter** - [http://twitter.com/IanMiddletonX](https://twitter.com/IanMiddletonX)

### **Comments on PR 9 and PR7b**

In relation to the consultation on development briefs for both of these sites I would like firstly to endorse the responses submitted by Yarnton and Begbroke Parish councils on site PR9 and Gosford and Water Eaton and Kidlington Parish Councils on site PR7b.

I would also add the following personal comments as parish, district and county councillor for both areas.

### **Sustainable building standards**

I note on both sites there are numerous nods towards low carbon building standards, although there are no firm commitments towards any of the recognised standards on either domestic or commercial properties such as BREEAM and Passivhaus.

In view of the fact that these developments will largely be undertaken during the period covered by the climate emergency motions of all associated councils at all levels of local government, it would seem appropriate for these standards to be adopted.

I'm aware that the policies within the current local plans are relatively weak on these matters and are largely advisory, but I still feel it would be reasonable for the council to hold developers to a higher standard in terms of sustainable development.

This could also include aspirations towards car free environments as well as a more focussed approach to active travel and modal shifts. These are all things that are usually included in planning applications, but it would be good to actually see them acted on.

### **Biodiversity**

Likewise the proposals regarding biodiversity enhancement should be more stringently applied, along with ongoing monitoring of these aspects. It is often the case that biodiversity improvements are aspired to, but very little is done to ensure that they are maintained long term. It would be good to see some sort of program included in the brief to remedy this.

### **Joined up developments**

These sites represent two parts of the overall development scope of the LPPR and as such there should be an effort to ensure that the infrastructure enhancements are made contiguous between each area. These should include health and education provision as well as transport.

### **Health and education**

It's notable that local health agencies are not actively included as consultees on these briefs which is surprising. Equally there seems to be a lack of an overall vision for education provision on both sites with regards to the popularity of existing local schools.

It's clear from my discussions with local parish councils that they would rather see existing local schools enhanced and improved than have new schools provided. Whilst it's likely that some new provisions will be required in strategic locations, schools like Gosford Hill should receive a good proportion of any developer contributions to ensure that it is able to cope with increased intakes. Likewise in Yarnton there should be additional funding for the expansion of the William Fletcher school.

### **Traffic management**

It's clear that this is going to be significant challenge both during the development phase and afterwards. Local roads are already over-capacity and the closure of the Sandy Lane crossing is likely to increase congestion on the A44. A great deal more thought needs to be given to these aspects, again as part of a joined-up plan.

Considering the likely length of the building phases on both these sites, more consideration should be given to the handling of delivery of materials and manpower, as well as the likely impact on local roads as a result. Particularly in areas like Yarnton where there are proposals to remove large areas of the sloping section of the PR9 site to accommodate a playing field, there needs to be careful planning and management for the removal of spoil. This should be backed up with monitoring of these arrangements to ensure that local roads are not impacted by the spreading of debris as a result.

### **Pedestrian Crossings**

These are vital pieces of infrastructure and should respond to local need.

Particularly in Begbroke, a crossing over the A44 should be an essential element in any local walking and cycling plans. The village has been lobbying for such a crossing on what is a dangerous road for many years. The new development both increases the need for this as well as providing a potential source of funding via S106 contributions. It's notable that there is no mention of such a crossing in the PR9 brief and this should be remedied as a priority in the document.

### **Sports facilities**

There appears to be no indoor sports facilities planned for the PR9 area. This seems to be predicated on the idea that people from that area will go to Kidlington to use facilities there, possibly enhanced and improved as a result of developments in areas like PR7b and other surrounding projects.

It would be preferable for more comprehensive indoor sports and recreation facilities were provided around the Yarnton and Begbroke areas to balance out the offer and demand for these. This is particularly important given that the closure of Sandy Lane is likely to increase journey times to Kidlington and divide these communities further.

### **Flooding**

This is a vital consideration in both areas, but moreover on site PR9 where Yarnton is now seeing regular flooding events, often associated with run off from Spring Hill. The Yarnton Flood resilience group has produced and submitted a detailed response on these matters and I would endorse this wholeheartedly. The group has done an amazing amount of valuable work in the area since being formed last year and I would hope that their views would be fully incorporated into the final brief.

I am also aware that Thames Water have considerable concerns about the impact in their network that the development on PR9 is likely to have. I understand they are not statutory consultees on these projects, but I would urge the council to seek their views on these matters as part of the final drafting of these briefs.

### **Ongoing consultation and engagement**

Given that the development phases are likely to be prolonged on both sites (and others within the area) I would urge the council to set up a local forum to include councillors at all levels of local government, as well as resident representatives to provide feedback to local authorities and the developers about any issues that may arise.

Such arrangements should ideally be enshrined in the development briefs to ensure that developers commit and engage with them at all stages with the expectation that they will respond to any local concerns.

Whilst local councillors will of course be the ultimate touchpoints for residents in many cases, it would be a valuable resource to have such a forum to allow direct and responsive contact between the existing local community, the developers, the local authorities and new residents as these communities evolve and ultimately become vastly different environments.

I would suggest that these arrangements are formalised as part of the development briefs on all sites within the LPPR.

**Ian Middleton**

Oxfordshire County Council Member for Kidlington South Division  
Cherwell District Council Member for Kidlington East Ward  
Kidlington Parish Councillor (Exeter Ward)  
Gosford & Water Eaton Parish Councillor  
Yarnton Parish Councillor





Development Brief Site PR7b: Land at Stratfield Farm, Kidlington -

July 2021

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir or Madam,

Please find our comments on the Draft Development Brief in the attached document.

Kind Regards

Dr. Jiri Fajtl & Dr. Mika Abu

22 September 2021

## Comments on the Draft Development Brief Site PR7b: Land at Stratfield Farm, Kidlington - July 2021

Dear Sir or Madam,

As current residents of a property adjacent to the Stratfield Farm, we would like to express our concerns and provide comments and suggestions on proposal PR7b, particularly the Eastern Gateway Character Area, as discussed in the Development Brief PR7b/July 2021 document <sup>1</sup>. While it is admirable that the building plan advocates for the establishment of a pleasing environment for new houses, it appears to show little consideration to the impact on current Cherwell residents.

Given the location of our house (368 Oxford Road, OX51DA, yellow in Fig. 1)), proposal PR7b affects our property the most of all the neighboring residents; the proposed new houses will be situated immediately along the entire length of our comparatively narrow property, in contrast to other houses that connect to the new building plots by their back gardens.

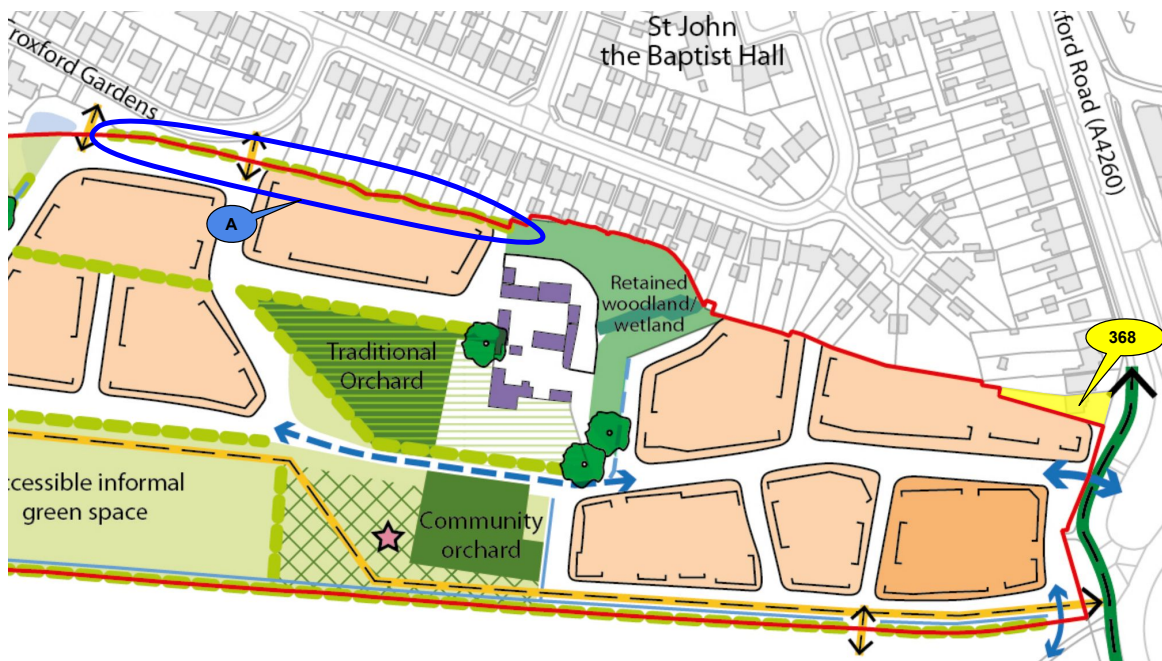


Figure 1: Our property 368, Oxford Road, is highlighted in yellow.

<sup>1</sup><https://www.cherwell.gov.uk/download/downloads/id/10154/draft-development-brief-pr-7b-for-consultation---website.pdf>

Due to our house and garden skew, all south and west windows are facing towards the newly proposed houses of the Eastern Area. We have no windows on the north side. The new two-story houses, directly bordering with our property (Fig. 1), would render our house dark with all views facing straight to the walls of new buildings. The proposal, as it stands, will significantly alter our home environment with a negative impact on our family's life, which is already manifesting. The development proposal also similarly affects our north neighbor, although to a lesser extent. In the light of the new development on the Stratfield Farm, our neighbor has already left the house.

Therefore, we propose retention of the existing (or a new) hedgerow along the southern border of our property, as indicated in Fig. 2,(B). A similar hedgerow is already implemented in the plan for other residents (Fig. 2,(A)) despite their properties being connected by the back gardens. Furthermore, we propose to leave a sufficient, three meters or wider, space between our property border and the nearest building walls. Perhaps this space could be allocated as back gardens for the new properties.

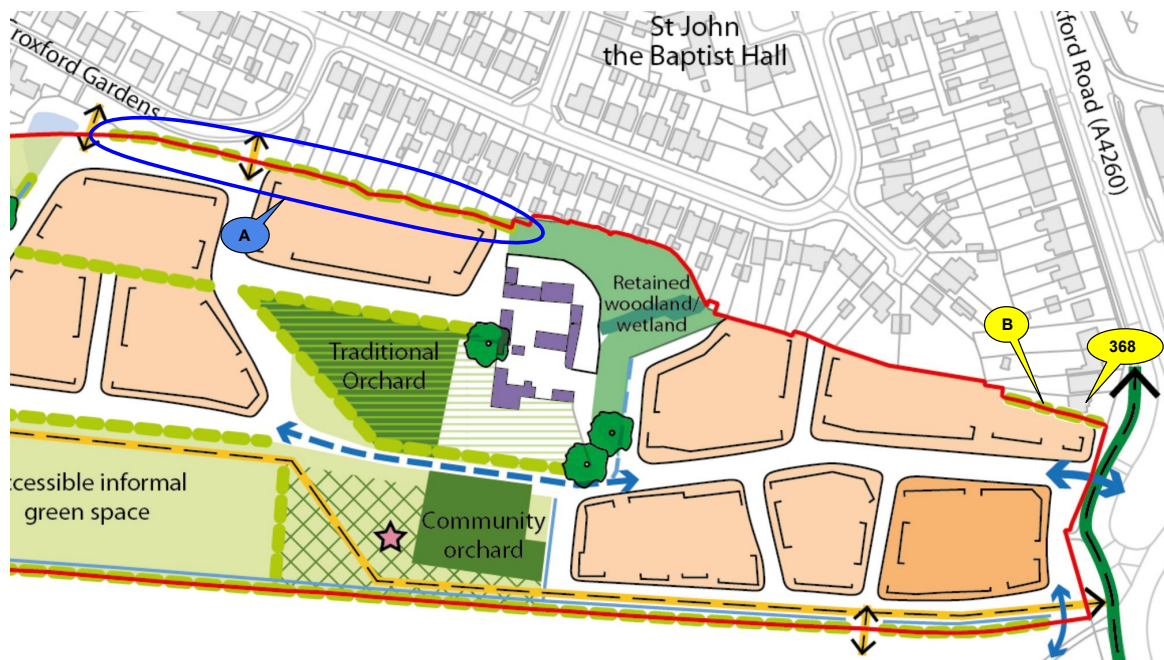


Figure 2: Proposed hedgerow (B) and hedgerow already included in the PR7b (A).

We hope you understand our concerns and take our comments into consideration.

With Kind Regards  
Dr. Jiri Fajtl and Dr. Mika Abu

**From:** Heather Pugh <HPugh@DavidLock.com>

**Sent:** 21 September 2021 17:33

**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** PR7b and PR9 - Development Brief Response from OUD/Hallam Land

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

Please find attached a joint response from OUD/Hallam Land to the draft development briefs for PR7b and PR9. I would be grateful if you could confirm receipt, and lodge a copy of this response in respect of each of the two Development Briefs in question.

We would be happy to discuss any of the points raised in more detail over the phone or via Teams if this would be useful.

Yours sincerely

**Heather Pugh**

Partner



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Development Briefs Project Team  
Planning Policy  
Conservation and Design Cherwell District Council  
Bodicote House  
Bodicote, Banbury  
Oxfordshire,  
OX15 4AA

21 September 2021

Our ref: TRI003

By email to:  
[DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk)

Dear Sir/Madam,

**Cherwell Local Plan Partial Review Draft Development Briefs:**

**Site PR7b: Land at Stratfield Farm (Kidlington) & Site PR9: Land West of Yarnton**

We write on behalf of Oxford University Development Ltd (OUD), development managers on behalf of the University of Oxford, Merton College and The Smith Trust, who are known collectively as the "Tripartite" and Hallam Land. Together, the Tripartite and Hallam Land own and control the vast majority of land (95% of the site allocated as a "new urban neighbourhood" by Policy PR8 of the *Cherwell Local Plan 2011-2031 Partial Review – Oxford's Unmet Housing Need* (CLPPR). David Lock Associates is commissioned as planning consultants to represent OUD on behalf of the Tripartite and promote its interests in relation to future development at Brobroke and Carter Jonas has a similar instruction from Hallam Land.

OUD and Hallam Land support the joined-up and holistic approach proposed for the delivery of the CLPPR sites as outlined within the Draft Development Briefs for Site PR7b Land at Stratfield Farm (Kidlington) and Site PR9 Land West of Yarnton.

Given the interrelationships between the Partial Review sites, subject to the series of Development Briefs currently being prepared, it is imperative that the planning submissions, and planning permissions, are prepared, structured and consented in a way that ensures compatible and complementary development in terms of both design and delivery.

We support the inclusion of Section 7.2 of the Draft Development Briefs, which references the intention to secure comprehensive development within each of the PR sites. Our view is however, that this section should also reference the need to secure the co-ordination of design or delivery elements that are common across the PR sites.

Appendix 4 of the adopted CLPPR sets out a schedule of the anticipated infrastructure needs associated with allocated development sites. It is clear that a number of these are 'common infrastructure' items, intended to serve all of the PR sites.

In some instances, this common infrastructure will be delivered through proportionate financial contributions (with each site required to make its own financial contribution to CDC/OCC, for example). However, in other instances, land or infrastructure is to be provided within one PR site, but on the basis that that land or infrastructure will meet the needs of the other PR development sites (or indeed, serve a wider population).

In terms of supporting the wider aims of the CLPPR spatial strategy and informing the submission and determination of planning applications, and if the Development Briefs are to ensure effective design and delivery of common social and physical infrastructure, we consider that the wording of the PR Briefs around this issue needs to be strengthened considerably.

This can be addressed by re-wording Section 7.2 in two respects. First, to ensure that development across the CLPPR sites in respect of common infrastructure, connections and networks is well designed and can be effectively delivered, we recommend the addition of two new bullets after the first bullet of 7.2, to read:

- ***Where land, services or infrastructure within the site is designed to serve wider CLPPR developments, planning applications will demonstrate how this can be co-ordinated and delivered effectively through site masterplanning and S106 agreements.***
- ***Any infrastructure links or open space networks that are common to more than one CLPPR development site will be constructed to the site boundary and access provided so as to avoid a 'ransom' position being established which prejudices effective delivery of this common infrastructure.***

Second, in respect of Heads of Terms for development contributions, it would be helpful to provide further clarity in the Briefs on the manner in which shared infrastructure across the CLPPR strategic housing sites is to be delivered. This would also assist the Council, applicants and other interested parties and stakeholders when submitting and considering applications on individual PR sites.

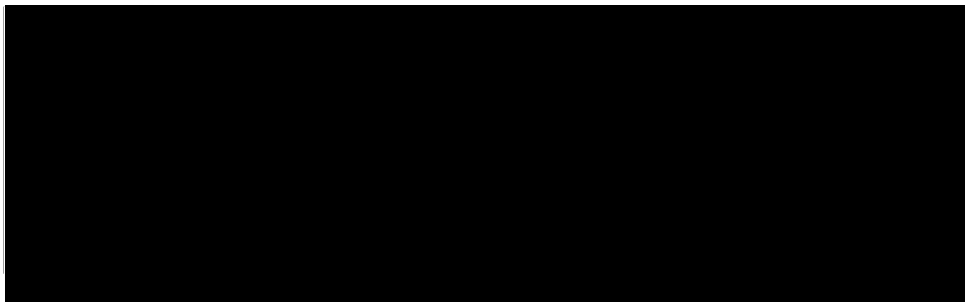
We therefore suggest that two additional bullets are added after bullet three of section 7.2, and that the current bullet four is amended to read (our additions in bold type):

- ***Obligations are to be secured via a planning agreement, entered into under section 106 of the Town and Country Planning Act 1990. Consistent with national planning policy and practice guidance and the Cherwell Developer Contributions SPD (February 2018), the allocation of S106 costs required to serve the development is to be agreed with the applicant to secure appropriate financial contributions and/or in-kind works under a direct delivery obligation. Subject to statutory tests, these shall provide for "on site" and/or "offsite" facilities and infrastructure as required.***
- ***In preparing a draft Head of Terms, ~~it is recommended that proposals~~ applicants should have regard to matters including the LPPR Infrastructure schedule. Where facilities and infrastructure are required to be provided on land outside the site, these are to be secured by way of proportionate planning obligations and/or through the pooling of contributions as appropriate, in accordance with the Community Infrastructure Levy Regulations 2010, as amended.***
- ***It is recommended that pre-application discussions are undertaken with Cherwell District Council ahead of submitting the draft Head of Terms for developer contributions. ~~In preparing a draft Head of Terms, it is recommended that proposals have regard to matters including the LPPR Infrastructure schedule and~~ should consider in discussions with infrastructure providers whether infrastructure issues will require the phasing of development to ensure that necessary services, facilities or apparatus are provided in advance if needed.***

We suggest that the inclusion of the above or similar wording (identical text to be inserted within each of the Development Briefs) would help to clarify the planning mechanism that will be used to secure any split of development costs on each of the allocated sites, thereby improving the efficiency of the planning and development process by reducing uncertainty as to what is expected from each development. This in turn will facilitate a joined-up approach to development in line with the stated purpose of the Development Briefs (Section 1.2).

We trust this is of assistance and look forward to being kept advised of the progress of the Local Plan Partial Review Development Briefs.

Yours sincerely,



HEATHER PUGH  
Partner  
David Lock Associates  
on behalf of the Tripartite/OD

Email: [hpugh@davidlock.com](mailto:hpugh@davidlock.com)

STEVEN SENSECALL  
Partner  
Carter Jonas  
on behalf of Hallam Land Management

Email: [steven.sensecall@carterjonas.co.uk](mailto:steven.sensecall@carterjonas.co.uk)

**From:** Blake, Patrick <Patrick.Blake@highwaysengland.co.uk>  
**Sent:** 20 September 2021 15:54  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Cc:** [REDACTED]

**Subject:** FW: #14119 FW: Development Briefs - Aug 2021

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

**Our Reference:** 14119

**FAO:** Cherwell District Council

**#14119 Development Briefs - PR7b: Land at Stratfield Farm and PR9: Land West of Yarton**

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

It is noted the development (PR7b) is located within the settlement of Kidlington, the series of development briefs are being brought forward as part of the Cherwell Local Plan Partial Review. Specifically the site is referenced PR7b: Land at Stratfield Farm, the nearest access point to the SRN is the junction with the roundabout junction with the A34/A44, approximately two kilometres to the south of Kidlington. The development brief identifies site PR7b shall deliver 120 homes on five hectares of land, of which 50% of shall be affordable housing. No transport specifics with regards to operational assessment are provided in the brief as the detail is currently high level. With respect to access, the sites primary access point to the SRN shall via the roundabout junction of the A34/A44. This location also serves the Peartree road service area and the Pear Tree Park & Ride site.

PR9, Land West of Yarton, is located to the west and north of Yarnton and south of Begbroke, adjacent to the A4. Policy PR9 of the LPPR sets out the policy requirements for the site which include 540 dwellings (net) on approximately 25 hectares of land with 50% affordable housing, alongside additional ancillary landuses.

In respect to both sites we would expect a robust transport assessment detailing the impact the development has on the SRN. This would include a baseline traffic survey of the SRN, including the A34/A44 roundabout junction, a trip generation and distribution review using industry best practices, growth scenarios covering a ten year period and if appropriate a junction capacity assessment identifying whether the need for mitigation is required as a result of the residual cumulative impacts. We



would also expect all site allocations in the area to be included in the assessment to understand the cumulative impact of future growth. Also additional developments may need to be included and this should be discussed with the local planning authority.

We welcome being included in any further discussions as to the transport specifics of this development.

Kind Regards

**Patrick Blake, Area 3 Spatial Planning Manager**

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

**Tel:** +44 (0) 300 4701043 | **Mobile:** + 44 (0) 7825 024024

Web: <http://www.highways.gov.uk>

GTN: 0300 470 1043

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**Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |**  
<https://www.gov.uk/government/organisations/highways-england> |  
[info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)

*Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ*

Consider the environment. Please don't print this e-mail unless you really need to.

**From:** Winter, Edward <Edward.Winter@HistoricEngland.org.uk>

**Sent:** 22 September 2021 15:15

**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>

**Subject:** CONSULTATION: Draft Development Briefs



Dear Sir or Madam

Please find attached Historic England's response to the above consultation.

Kind regards

**Edward Winter LLB MA MRTPI**

Historic Environment Planning Adviser

Regions Group (London & South East)

Historic England, Floor 4, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA  
07557 831241



Historic England

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at [historicengland.org.uk/strategy](https://historicengland.org.uk/strategy).

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)



Historic England

By email only to: [DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk)

Our ref: PL00754382

Your ref:

Main: 020 7973 3700

Direct: 020 7973 3659

[e-seast@historicengland.org.uk](mailto:e-seast@historicengland.org.uk)

[edward.winter@historicengland.org.uk](mailto:edward.winter@historicengland.org.uk)

Date: 22/09/2021

Dear Sir or Madam

**Local Plan Partial Review Draft Development Briefs (Site PR7b: Land at Stratfield Farm, Kidlington and Site PR9: Land West of Yarnton)**

Thank you for inviting Historic England to comment on the above document. On the basis of the information currently available, we do not wish to offer any comments at this stage. We may wish to comment on proposals later in the planning process.

Yours sincerely

**Edward Winter**

Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

Page 111



**From:** Rachel Faulkner <clerk@kidlington-pc.gov.uk>  
**Sent:** 30 September 2021 16:52  
**To:** Nathanael Stock <Nathanael.Stock@Cherwell-DC.gov.uk>; Maria Dopazo <Maria.Dopazo@Cherwell-DC.gov.uk>  
**Subject:** Stratfield Farm site

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi

I am not sure whether we have already given KPC's comments on this site.

Apologies if we are late in the day but please confirm receipt.

Cheers

Rachel

Rachel Faulkner  
Clerk to Kidlington Parish Council  
Exeter Hall  
Kidlington  
Oxford  
OX5 1AB

[www.kidlington-pc.gov.uk](http://www.kidlington-pc.gov.uk) – please check our website for useful information and numbers.

01865 372143



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From 25th May 2018, new data protection rules come in to effect. If you would like to know what personal information we hold about you, or be removed from our records please contact us by clicking on the link

[www.kidlington-pc.gov.uk](http://www.kidlington-pc.gov.uk)

## **Report to council 23<sup>rd</sup> September 2021**

### **Response to the Stratfield Farm Development Brief Consultation Site PR7b**

- The Development Brief for this site, which is the only site in the Cherwell Local Plan Partial Review, sits in the Kidlington Parish was discussed at the Policy and Finance committee. The Committee agreed to make a series of representation in respect of the consultation which are detailed below with some additional comments.
- The Proposal allows for residential property up to 2.5 floors backing on to Garden City. It was felt that at this location the houses should be limited to 2 storeys i.e ground and first floor to avoid a detrimental impact on the existing properties in Garden City.
- There is a drainage ditch that runs along the rears of the Garden City estate. We want to be sure that this ditch will not be overloaded and causes a risk to flooding for existing properties in Garden City. We would look to this development leading to an improvement on the current situation.
- There is one access to the site from the Kidlington Roundabout with only cycle and walking access into Croxford Garden and Garden City. We would prefer to see the site have two access one from the roundabout and one through Croxford Gardens but for the only cycle and walking access all though the site.
- How is access to Stratfield Brake to be managed associated with the new development?
- We are concerned about how the access on to the Kidlington roundabout will be safely configured because the access appears to join the west service road of Oxford Road close to the roundabout. Also noting that works are proposed to the roundabout that Kidlington Parish Council, has to date, not been consulted upon.
- We want to be assured that the cycle routes within the site integrate with a strategic cycle route within Kidlington and North Oxford. It is also important that the development incorporates natural surveillance to the cycle and pedestrian links proposed.
- We value the inclusion of a play area, but it will be important that this is a meaningful play area that will get use by residents. This forms part of a wider open space provision including a kickabout area and there is also the traditional orchard indicated that require ongoing engagement with Kidlington Parish Council over management. The same applies to mention

of a community food growing garden rather than the provision of allotments.

- There is no reference to affordable housing provision and how this relates to integration into the design of the development.
- The listed building farmhouse and the area around are important, giving a division in the overall development to enable three areas of residential development to be significantly different in design providing an overall scheme with unique residential areas that are distinctive compared to many new large residential developments.

David Betts  
14<sup>th</sup> September 2021

**From:** Mark Gardner [REDACTED]  
**Sent:** 16 September 2021 17:45  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Subject:** Stratfield Farm and impact on Stratfield Brake grounds

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon

Whilst I appreciate that homes are needed I feel that this development is not suitable for the way the environmental implications work in the village.

Stratfield Farm and Stratfield brake act as a fall away for the rainfall.

By building homes on Stratfield Farm you will be putting in a barrier which in one case may well help with the rugby pitches drainage as they flood due to heavy rain.

By causing a barrier this could have implications on flooding.

The other issue is established wildlife and trees which have Red Kites nesting every year. I have seen then on the boundary area between the proposed development and sports field.

Also Dear can be seen running from the farm area across the sports field then into the wetlands.

The area of the wetlands behind the sports area has what I feel is a unique balance of wildlife. Any major construction works will cause damage to nesting areas breeding of stoats foxes Badgers .

Otters have been seen in the wetlands area.

I urge you to reconsider the development and make the whole area a nature reserve development on the house to be restored to enable schools and communities groups to learn about the environment.

As the impact will also have an effect of the carbon emissions raised levels us additional health issues on breathing.

Kind regards

Mark Gardner

Resident of Kidlington  
Since 1990

**From:** Hughes, Lynette - Communities <Lynette.Hughes@Oxfordshire.gov.uk>  
**Sent:** 22 September 2021 17:21  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Subject:** Development Brief consultation response - Site PR7b Land at Stratfield Farm Kidlington

Dear Planning Policy

In response to your public consultation closing tonight, please find attached the County Council's officer response on the draft development brief for Site PR7b, Land at Stratfield Farm Kidlington.

We are separately also responding on the development brief for Site PR9, Land West of Yarnton.



**CHERWELL DISTRICT COUNCIL  
PLANNING POLICY CONSULTATION  
11 AUGUST 2021 TO 22 SEPTEMBER 2021  
Local Plan Partial Review Draft Development Briefs for:  
Site PR7b: Land at Stratfield Farm (Kidlington) & Site PR9: Land West of Yarnton**

The Council has published the above draft Development Briefs for public consultation.

The Local Plan Partial Review was adopted in September 2020 and requires the preparation of development briefs to help us secure well-planned, high-quality development on each of the Plan's allocated sites. The draft briefs need to accord with the adopted planning policies and provide further detail on the design and layout proposals for these sites. Once approved, the briefs will be key considerations in the preparation of and determination of any future planning applications brought forward on these two allocated sites.

In the coming months the council will be preparing development briefs for the other sites allocated in the Plan, and these will also be published for consultation in due course.

The two draft Development Briefs are available to view online at  
[www.cherwell.gov.uk/planningpolicyconsultation](http://www.cherwell.gov.uk/planningpolicyconsultation).

**Inspect the Documents**

Online at [www.cherwell.gov.uk/planningpolicyconsultation](http://www.cherwell.gov.uk/planningpolicyconsultation)

If anyone has difficulty accessing the documents online, they can contact the Development Briefs Project Team for assistance on 01295 227006 or email [DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk).

During opening hours at:

**Cherwell District Council Offices**, Bodicote House, White Post Road, Bodicote, Banbury, OX15 4AA

**Kidlington Library**, Ron Groves House, 23 Oxford Road, Kidlington, OX5 2BP

**Oxford City Council**, St Aldate's Chambers, 109 St Aldates, Oxford, OX1 1DS

**Oxfordshire County Library**, Queen Street, Westgate, Oxford, OX1 1DJ

**Summertown Library**, South Parade, Summertown, Oxford, OX2 7JN

**Woodstock Town Council**, Woodstock Town Hall, Market Place, Woodstock, OX20 1SL

**Woodstock Library**, The Oxfordshire Museum, Fletcher's House, Park Street, Woodstock, OX20 1SN

**Submitting Comments**

Comments on the two draft Development Briefs should be sent:

By email to [DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk)

Or by post to: Development Briefs Project Team, Planning Policy, Conservation and Design, Cherwell District Council, Bodicote House, Bodicote, Banbury, OX15 4AA.

Representations made will be considered for incorporation into the final versions of the Development Briefs.

**Comments should be received no later than 11.59pm on Wednesday 22 September 2021. Any comments received will be made publicly available. Personal details will be protected.**

Best regards

Lynette Hughes

Principal Planner / Strategic Planning Team / Infrastructure Strategy & Policy /  
Environment and Place / Oxfordshire County Council / County Hall, New Road, Oxford, OX1 1ND /  
<https://www.oxfordshire.gov.uk>  
Tel: 0792 0084 360

**County Hall  
New Road  
Oxford  
OX1 1ND**

Planning Policy  
Cherwell District Council

**Corporate Director: Bill Cotton  
Environment and Place**

**22nd September 2021**

By email:  
developmentbrief@cherwell-dc.gov.uk

Dear Planning Policy

**Public Consultation on Local Plan Partial Review Draft Development Briefs  
(Site PR7b: Land at Stratfield Farm, Kidlington)  
Closing date 22<sup>nd</sup> September 2021**

Oxfordshire County Council welcomes the opportunity to review the draft development brief for PR7b, Land at Stratfield Farm, Kidlington. Comments are attached as Appendix 1 to this letter.

We have previously had an opportunity to comment on a draft development brief and appreciate that some of our consultative comments have been taken on board in the preparation of this document dated July 2021.

Cherwell District Council has decided to consult on only two draft development briefs at this time (PR9 and PR7b) and other development briefs are not yet ready for this stage. This Stratfield Farm site has a relationship to the Begbroke site (PR8) by way of a proposed canal bridge and cycle path. Our comments below are made in the absence of a development brief for PR8.

The County Council is willing to engage with the landowner and District Council on preapplication discussions relating to the development of this site, allocated for 120 homes.

Yours faithfully,



Lynette Hughes  
Principal Planner

[www.oxfordshire.gov.uk](http://www.oxfordshire.gov.uk)

## **Appendix 1 – County Council Comments on PR7b Draft Development Brief - Land at Stratfield Farm, Kidlington**

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### **Strategic Planning**

Specialist Housing Policy BSC 4 of the adopted Cherwell Local Plan Part 1 (adopted July 2015) requires housing sites of at least 400 dwellings to 'provide a minimum of 45 self-contained extra care dwellings as part of the overall mix' and includes some flexibility on the requirement. Elsewhere, opportunities for specialist housing will be encouraged in suitable locations. The development brief should be amended to make it clear if any provision for specialist housing is expected on this site.

Para 1.2 We are fully supportive of the purpose of development briefs to guide future site development. It is not clear why the District Council has chosen that the development briefs will not have the status of a Supplementary Planning Document, which would give them a stronger status.

General and 7.0 The development brief should clearly set out how enhancement and beneficial use of the Green Belt land within the allocation will be achieved or conditioned upon an application for development on any or all of the 5ha expected to be used for residential development.

### **Transport Development Control**

General and 6.4.6 The draft development brief covers a range of issues that need to be addressed from a design perspective in relation to roads, cycle and pedestrian paths and car parking.

As this is a site close to Oxford, we expect that car parking provision will be less than on sites further from Oxford. We support the reference to advocating the provision of unallocated on-street parking.

The County Council has a range of existing documents which could be referred to such as our cycling and walking design standards and active healthy travel strategy<sup>1</sup>. All development should also be in accordance with the government's LTN 1/20 on cycle infrastructure design. In addition, the County Council's new Street Design Guide is being reported to the County Council's Cabinet on 21/09/21<sup>2</sup>.

6.4.3 Add as first bullet point: 'The main site access must include provision for pedestrians and cyclists alongside vehicular traffic which shall be carefully designed

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<sup>1</sup> <https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-and-healthy-travel>

<sup>2</sup> <https://mycouncil.oxfordshire.gov.uk/ieListDocuments.aspx?CId=115&MId=6380>

to enable pedestrians and cyclists to comfortably connect onto the existing infrastructure.'

6.4.4 Add as a bullet point on primary street development principles: 'At least 2m wide footways on both sides of the primary street.'

Add as a bullet point on secondary street development principles: 'To maintain a 2m wide provision for pedestrians on any side of the carriageway fronted by properties.'

### **Infrastructure Locality (Cherwell & West)**

The County Council intends to deliver bus and cycling improvements at Kidlington Roundabout. The developer will need to liaise with the County Council's delivery team accordingly.

There is no mention of adhering to LTN 1/20 standards within the planned development. Walking and cycling provisions must be in keeping with the principles throughout the development.

### **Public Health**

Para 1.2.1 Please change this bullet to read: 'to raise the standard of design and to create exemplary places which are functional, beautiful, promote health and wellbeing and which engender a sense of community'.

Para 4.2.1 Please add the following sentence: 'It is important to ensure effective connectivity between the development and existing community that supports active travel and reduces severance.'

Para 6.2 Consider including reference to the positive impacts on mental health. In order to ensure that the design of major developments maximises the opportunity to promote health and wellbeing, the Future Oxfordshire Partnership has developed and approved the use of a Health Impact Assessment toolkit<sup>3</sup> to assess the health impacts of significant developments. Given the size of this development, the Council would expect a Health Impact Assessment to be conducted of this site to ensure that it maximises opportunities for a health enabling environment, in accordance with government's advice and national best practice.

Para 6.3 This section should include a principle on green space and how it will encourage walking and cycling, biodiversity and community use.

Para 6.3.2 Cycle parking must be easily accessible, ideally at house frontages, to promote active travel.

---

<sup>3</sup> <https://www.oxfordshiregrowthboard.org/wp-content/uploads/2021/01/210126-Oxon-HIA-Toolkit-FINAL.pdf>

Para 6.4.5 Reference should be made to the fact that cycling routes should support connectivity. The draft Local Cycling and Walking Investment Plan (LCWIP) for Kidlington<sup>4</sup> should be referred to.

Para 6.5 The benefits of planting larger trees outweigh the overshadowing effect on gardens and windows mentioned here. In order to adapt to future changes in climate and mitigate some of the most extreme effects, large trees have been proven to significantly reduce air temperatures during hot weather and provide a natural shelter from the sun.

---

<sup>4</sup> <https://www.cherwell.gov.uk/info/3/leisure-and-culture/780/kidlington-lcwip-consultation>

**From:** Natasha Hurley <tasha.hurley@savills.com> **On Behalf Of** Thames Water Planning Policy  
**Sent:** 21 September 2021 09:58  
**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>  
**Cc:** Devcon Team <devcon.team@thameswater.co.uk>; 'Nicky Mchugh' <Nicky.Mchugh@thameswater.co.uk>; Mark Dickinson <Mark.Dickinson@thameswater.co.uk>; 'John Georgoulas' <john.georgoulas@thameswater.co.uk>; Phoebe Juggins <Phoebe.Juggins@thameswater.co.uk>; James Walker - Planning <james.o.walker@savills.com>; Stefania Petrosino <stefania.petrosino@savills.com>  
**Subject:** Cherwell - Draft Development Briefs - REPONSE ON BEHALF OF THAMES WATER UTILITIES LTD



Dear Sir/ Madam  
Please find our response to the above attached on behalf of Thames Water.  
Regards,  
Natasha  
**Tasha Hurley**  
**Team Administrator**  
**Planning**

Savills, Ground Floor, Hawker House, 5-6 Napier Court, Napier Road, Reading RG1 8BW

 Tel : +44 (0) 1189 520 509  
Mobile : +44 (0) 79717 63964  
Email : [tasha.hurley@savills.com](mailto:tasha.hurley@savills.com)  
Website : <http://www.savills.co.uk>



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Sent by email: [DevelopmentBrief@cherwell-dc.gov.uk](mailto:DevelopmentBrief@cherwell-dc.gov.uk)

[thameswaterplanningpolicy@savills.com](mailto:thameswaterplanningpolicy@savills.com)

0118 9520 500

17 September 2021

## Cherwell - Draft Development Briefs

Dear Sir/Madam,

Thames Water are the statutory water supply and sewerage undertaker for the Cherwell District Council area, and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. Thames Water wish to make the following comments pertaining to the draft development briefs for Site PR7b: Land at Stratfield Farm, Kidlington and Site PR9: Land West of Yarnton.

### General Water and Wastewater Infrastructure Comments

New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the National Planning Policy Framework (NPPF), February 2021, states: “**Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...**”

Paragraph 28 relates to non-strategic policies and states: “**Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...**”

Paragraph 26 of the NPPF goes on to state: “**Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...**”

The way water and wastewater infrastructure will be delivered has changed. Since the 1st April 2018 all off site water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Strategic water and wastewater infrastructure requirements will be funded through water companies’ investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.

It is important not to under estimate the time required to deliver necessary infrastructure. For example to understand, design, and deliver local network upgrades can take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Implementing



new technologies and the construction of a major treatment works extension or new treatment works extension or new treatment works could take up to 10 years.

Thames Water has limited powers under the Water Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. In some circumstances it may be necessary to phase development in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding, pollution of land, and water courses and / or issues with water supply in the form of no or low water pressure. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme.

### Section 7.1

Section 7.1 refers to the information required to accompany planning applications including Flood Risk Assessments, Drainage Assessments including Water Infrastructure Capacity.

Thames Water offer a free pre-planning service which is available for developers and land owners to discuss their proposals. The following text could be inserted to encourage developers to engage with Thames prior to submitting a planning application:

*“Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.*

*Thames Water encourages developers to use their free pre-planning service (<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>). This service can tell developers at an early stage if there will be capacity in Thames Water and/or wastewater networks to serve their development, or what they will do if there is not.*

*The developer can then submit this communication as evidence to support a planning application and Thames can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes.”*

### Site Specific Comments

Please find enclosed a table setting out individual comments for the proposed site allocations.

We hope this is of assistance. If you have any questions please do not hesitate to contact Stefania Petrosino on the above number.

Yours sincerely,

**Thames Water Utilities Ltd**



Site ID	Site Name	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Net Increase in Demand (l/day)	Net Increase in Peak Demand (l/s)	Net Property Equivalent Increase - Water
55030	PR7b Land at Stratfield Farm	128304	1.49	120	42000	1.46	120

55029	PR9 Land West of Yarnton	577368	6.68	540	189000	6.56	540
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Water Response	Waste Response
<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p>	<p>Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered

**From:** Bob Sharples <Bob.Sharples@sportengland.org>

**Subject:** PR7b Land at Stratfield Farm Development Brief Draft for Consultation- Sport England ref: SP/21/00004575

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

Thank you for inviting Sport England to comment on this document.

We have two concerns:

At the stage D sign-off at 11 am, Wednesday 31<sup>st</sup> January 2018 the steering group met with CDC and their consultants. I raised the need to try and expand Stratfield Brake Sports Ground and I was told it was impossible because the site is land locked. This development brief tells a different story. It would appear it possible to deliver more sports facilities at this site if the housing did not proceed.

The discussion on the 31<sup>st</sup> January 2018 and subsequent discussions suggested creating a football hub at some point in the future the other side of the between the Bicester Road and A34.

The concern we have is the delivery date is completely unknown where as the expansion of the PR7b site could take place in the near future and start to deliver much need sports facilities.

Given the recent commitment by CDC to prepare a new Playing Pitch Strategy, I would suggest it is presumptuous to bring this site forward for housing until the site assessed for its sporting protentional

I have discussed this with the RFU, ECB and FA, who support the principle of exploring PR7b as an extension of the Stratfield Brake Sports Ground. Thus creating a more financially sustainable site.

The second concern is: the new road which is being proposed into Stratfield Brake Sport Ground. The main rugby pitch is close to the diagrammatic access. We would caution that location of this road does not impact on the main pitch or on the spectator area. There may be a need for protective netting to protect new road. While the principle of the new road may be acceptable, more detail will be required. I would suggest engagement with the RFU at the design stage.

**For clarity**

Sport England does not currently support the proposed development plan on the grounds there is a need to explore the site for an extension to Stratfield Brake Sports Ground.

I would welcome the opportunity to discuss these matters further.

Your sincerely

Bob

**Bob Sharples** MRTPI RIBA  
Principal Planning Manager - South Team



**From:** Bridget Fox <BridgetFox@woodlandtrust.org.uk>

**Sent:** 22 September 2021 21:43

**To:** Development Brief <developmentbrief@cherwell-dc.gov.uk>

**Subject:** Local Plan Partial Review Draft Development Brief (Site PR7b: Land at Stratfield Farm, Kidlington).

**CAUTION:** This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Please find attached a response from the Woodland Trust to the Local Plan Partial Review Draft Development Brief (Site PR7b: Land at Stratfield Farm, Kidlington).

Our response addresses the impact on our adjacent site at Stratfield Brake as well as the potential for green infrastructure across the development site.

Best wishes,

Bridget

Please note my mobile number is [REDACTED]

## **Cherwell District Council - PR7b Land at Stratfield Farm: Development Brief Draft for Consultation**

### **Response from the Woodland Trust**

**September 2021**

#### **About the Woodland Trust**

The Woodland Trust ("the Trust") is the UK's leading woodland conservation charity: we want to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees.

We own over 1,275 sites across the UK, including Stratfield Brake adjacent to this development site. In total our sites cover over 23,580 hectares and we have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society.

#### **Summary**

We welcome the opportunity to comment on the draft Development Brief (PR7b) for the land at Stratfield Farm.

We welcome the commitment to a multi-functional green infrastructure network across the site (section 6.5). We welcome the inclusion of woody elements, including the protection and extension of existing trees, orchards and hedgerows, the use of sustainable drainage, and the commitment to plant new trees of native species.

We recommend strengthening this section with

- 20% target for biodiversity net gain across the site.
- a tree canopy cover target for 30% across the site.
- a greater than 1:1 requirement for tree replacement.
- specifying UK & Ireland sourced & grown (UKISG) standards for new tree planting.
- protecting and providing woodland to meet the Trust's Woodland Access Standard.

We welcome the commitment in section 6.4.5 to work with the Trust on the proposed new canal bridge and towpath improvements and welcome the opportunity for further discussion on this and other topics affecting our Stratfield Brake site.

We believe there is an important opportunity to improve the hydrology of the site and to enhance the environmental quality of the waterside habitat. We are grateful for the opportunity to respond to this consultation and look forward to working with Cherwell District Council as the plans develop.

Our detailed response focuses primarily on:

- The proposals for green infrastructure across the site (section 6.5)
- Conservation and access impacts for the Trust's Stratfield Brake site.



### **Green infrastructure (Section 6.5)**

We welcome the commitment to a multi-functional green infrastructure network across the site. We welcome the inclusion of woody elements, including the protection and extension of existing trees, orchards and hedgerows, the use of sustainable drainage, and the commitment to plant new trees of native species.

Hedgerows and trees outside woods provide vital connectivity between habitats, contribute shelter, and shade, and assist with water management, among other green infrastructure benefits. Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats.

To achieve ongoing benefits, green infrastructure needs to be protected and maintained. CIL allocations should include green infrastructure, including management plans and funding for maintenance. Natural green infrastructure is cost-effective: for example, trees cost less to maintain than regularly mown turf and have wider biodiversity benefits.

We note the commitment to seeking a minimum of 10% biodiversity net gain through the planning process, in line with emerging legislation. As this is a new, greenfield development we believe there is potential for a higher level of net gain and would encourage setting a 20% target across the site. Setting a more ambitious target increases the chances that worthwhile amounts of net gain will be delivered, given the possibility that specific initiatives intended to deliver such gain may fall short in practice.

We recommend setting a target for tree canopy cover as part of this development brief, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.

We propose setting a minimum 30% tree canopy cover target for new development land or by a development-related ratio, for example stipulating that a minimum of 10 trees are planted on site for every new house constructed. This would contribute to the rapid increase in tree cover that has been proposed by the UK's Committee on Climate Change. We commend the Wycombe District SPD on Canopy Cover (2020) as an example of such a policy.

We welcome the recognition of the value of trees for the environment, and the presumption in favour of the retention and enhancement of existing trees, woodland, and hedgerow cover on the site. Integrating trees and green spaces into developments early in the design process minimises costs and maximises the environmental, social, and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).

We further request that where there is an unavoidable loss of trees on site, that an appropriate number of suitable replacement trees will be required to be planted. with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees, in line with the Woodland Trust guidance on Local Authority Tree Strategies (July 2016). We commend the Bristol City Council Planning Obligations SPD (2012) as an example of such a policy.

We welcome the commitment to planting native tree species. Native tree species provide the best habitat for the native birds, insects, fungi, and plants that are critical to Oxfordshire's

biodiversity. We would further encourage the specification where possible of UK & Ireland sourced and grown (UKISG) tree stock for new planting, to support biodiversity and resilience. Imported tree stock is the primary source for pests and diseases against which existing native trees have no defence. It is important that public policy leads the way in protecting plant health.

We welcome the commitment to Sustainable Drainage Systems (SuDS) across the site. Woods and trees should form an integral part of all SuDS schemes. Planting trees can slow the flow of water and reduce surface water runoff by up to 62% compared to asphalt. Tree roots can increase infiltration rates in compacted soils by 63%, and in severely compacted soils by 153%. Integrating SUDS into the tree pit design for street trees can have a significant effect on 'slowing the flow'. Providing adequate soil volume for trees hard surface areas also helps retain water and reduces the threat of future building movement from desiccated soil.

We welcome the commitment to publicly accessible woodland. We recommend that this meets the Trust's Woodland Access Standard, developed to complement Natural England's Accessible Natural Green Space Standard. This recommends that:

- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

We would be happy to discuss these policy issues further with your officers as the proposals develop.

#### **Stratfield Brake: conservation and access**

The Trust's Stratfield Brake site is adjacent to the site, on the southwest boundary, as acknowledged in section 4.1 of the development brief (Site Constraints). The Trust manages our sites for people and for nature, maximising the opportunities for appropriate public access, while providing high quality natural habitats.

We provide free public access to woods for quiet, informal recreation and our woods are managed to make them accessible, welcoming, and safe. It is important that any adjacent development does not harm the tranquillity of the site, and that encroachment on its edge is avoided as this could adversely affect its environmental quality and its value as a natural habitat.

We would ask that site layout and construction management plans ensure that:

- built elements are located at the areas of the site away from Trust's site
- construction site access is away from the Trust's site
- traffic access to any future development is away from the Trust's site.

We welcome the proposal to locate the priority areas for habitat creation and restoration immediately adjacent to the Trust's site, maximising the potential for habitat connectivity and nature recovery.

We would propose that this area is managed in the same way as the adjacent wetland within the Trust's site. This is a mix of scrub and wet meadow, with permanent open water, featuring reedbed and sedge, managed by grazing cattle. We would encourage the creation of new scrapes (ponds) connected to the existing canal-side ditch network, providing high quality habitats for invertebrates and wading birds.

Stratfield Brake is one of the largest open access countryside sites available in this area. However, public access is currently excluded in parts of the site, to protect sensitive wildlife using the wetland area, and to reduce contact and transfer with diseased oak trees in the mature woodland area. The provision of additional accessible natural green space within the Stratfield Farm site is therefore particularly welcome.

The proximity of the site to the Oxford canal means that Stratfield Brake forms part of a connected network of accessible land. We note the proposal to create a new footbridge across the Oxford Canal, linking the development site to the public towpath. This is in addition to the existing footbridge at the western end of the Trust's site, near the wetland area. We welcome the improved access to the towpath and the greenspace network. However, it is important that this is managed to avoid inappropriate access to the protected wetland areas.

The access path for this new footbridge is shown between the extended wildlife site and an area with some limited public access. We would like to see this path fenced with stock proof fencing either side, with the installation of locked field gates for maintenance and grazing. The path would have good visibility of the meadows and there could be interpretation included, to ensure users can enjoy the wetland area without harming it.

We welcome the commitment in section 6.4.5 to work with the Trust on the proposed new canal bridge and towpath improvements and welcome the opportunity for further discussion on this and other topics affecting our Stratfield Brake site.

Although not directly part of this development brief, we note the reference the allocation of Land at Frieze (PR6c) as being reserved for the potential construction of a golf course. This site is adjacent to the south of the Trust's Stratfield Brake site. We are very concerned that such a land use could introduce fertilisers and herbicides that may flow into the combined ditch network, seriously undermining the ecological quality of our site.

21 September 2021

Bridget Fox  
Regional External Affairs Officer - South East

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