



FORMAL PLANNING OBJECTION

Application: 25/02895/OUT
Proposal: Outline application for up to 95 dwellings
Location: Land Adjoining and West of Bloxham Recreation Ground, South Newington Road, Bloxham

1. Introduction and Status

Bloxham Parish Council objects to the above application. The objection is based on conflict with the statutory development plan, unacceptable flood risk and highway safety impacts, and material harm to village character, recreation provision and settlement form.

The **Bloxham Neighbourhood Plan (NP1)** forms part of the development plan and must be given full weight in decision-making in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004.

2. Principle of Development and Spatial Strategy (Policy BL1)

The application site lies **outside the defined Settlement Boundary** and is not allocated for residential development within the Neighbourhood Plan.

Policy BL1 establishes a clear, plan-led spatial strategy directing housing growth to:

- sites within the Settlement Boundary, and
- specific allocated sites outside the boundary

The proposal does not meet the policy test for countryside development and represents an unjustified extension of the village into open land. Approval would fundamentally undermine the spatial strategy and certainty provided by the Neighbourhood Plan.

3. Impact on Recreation Land and Community Infrastructure (Policies BL8 and BL15)

The David Tyrrell Recreation Ground is a long-established and strategically important village asset, providing:

- publicly accessible sports pitches in the village
- extensive play facilities for children and young people, and
- an important green buffer forming the southern edge of the settlement

The Parish Council considers that development adjacent to this site would materially undermine its function, setting and long-term resilience. The proposal conflicts with the Neighbourhood Plan's objectives to safeguard recreation land, protect community infrastructure and promote health and wellbeing.

4. Flood Risk, Drainage and Climate Change (Policy BL8)

(Please also refer to Appendix A and photographs contained within Appendix B)

The Parish Council has **serious and unresolved concerns** regarding flood risk and drainage.

The recreation ground and surrounding land are **known to flood regularly**, most notably during **Storm Bert (November 2024)** when floodwater inundated the recreation ground, pavilion and surrounding areas. These events materially exceeded predicted flood extents and volumes.

The submitted Flood Risk Assessment is considered inadequate because it:

- relies on **outdated baseline data and historic modelling** that do not reflect recent extreme rainfall events or climate change impacts
- fails to properly consider **actual flood events**, including Storm Bert
- does not adequately assess **cumulative impacts**, particularly in combination with the approved William Davis development on the opposite side of the A361, which will alter surface water flows and runoff characteristics
- lacks clarity regarding **ownership, responsibility and long-term maintenance** of drainage infrastructure, including SuDS and off-site connections

The Parish Council is concerned that additional areas of **hardstanding and impermeable surfaces** would effectively surround the recreation ground, reducing infiltration and increasing runoff into an already constrained drainage system. This presents a clear risk of:

- increased flooding of the recreation ground and pavilion
- downstream flooding elsewhere in the village, and
- overloading of watercourses and foul drainage infrastructure

In the absence of robust, up-to-date modelling, evidence of resilience to recent extreme events, and secured long-term management arrangements, the proposal fails to demonstrate compliance with Policy BL8 and national flood risk policy.

5. Highway Safety, Traffic Impact and Access (Please also refer to Appendix C)

The Parish Council raises **strong objections on highway safety grounds**.

The A361 / South Newington Road is a heavily trafficked strategic route carrying high volumes of traffic, including HGVs, and is already subject to:

- persistent speeding well in excess of posted limits
- congestion and queuing
- constrained visibility due to bends and road geometry, and
- a recent history of serious and fatal accidents

Traffic monitoring data collected close to the site demonstrates:

- average vehicle speeds exceeding the 30mph limit
- peak hourly flows equivalent to a vehicle every 10 seconds northbound
- 85th percentile speeds significantly above the legal limit, and
- recorded speeds of up to 65mph

The proposed access is located close to a bend, within a speed-limit transition zone, and in proximity to existing and consented access points serving other large developments. The Parish Council considers that:

- safe access and egress have not been demonstrated
- vehicles would be required to merge with fast-moving traffic from both directions, and
- cumulative impacts with nearby developments have not been adequately assessed

There are also serious concerns regarding **pedestrian and cyclist safety**, particularly for children and young people accessing the recreation ground. Increased traffic movements in close proximity to this facility would materially increase risk.

Taken together, the proposal would result in **severe residual impacts on highway safety**, contrary to national policy and the objectives of the Neighbourhood Plan.

6. Character, Landscape and Settlement Form (Policy BL9)

The proposal would result in an incongruous urban extension into open land that currently forms part of the village's green setting and southern gateway. This would erode the rural character of Bloxham and conflict with Policy BL9, which requires development to respect local character, landscape setting and settlement form.

7. Housing Need and Site Selection

The Neighbourhood Plan already provides for housing significantly in excess of the indicative requirement for Bloxham through existing permissions and the allocated Painters Farm site. There is therefore **no strategic housing justification** for releasing land adjacent to a key recreation asset.

The Draft Modified Neighbourhood Plan's site assessment and selection process explicitly discounted sites beyond or adjoining the recreation ground due to poor integration, limited accessibility and an inability to deliver meaningful community or infrastructure benefits. The proposal directly conflicts with this evidence base.

8. Effect on The Slade Nature Reserve (Please also refer to Appendix D)

The proposed development adjacent to The Slade Local Nature Reserve would cause significant and irreversible harm to a small, fragile and highly diverse ecological site that relies on its surrounding countryside to function effectively.

The development would isolate the reserve, increase edge effects, disrupt wildlife corridors and lead to substantial increases in footfall, dog walking, noise, lighting and predation by domestic pets, all of which would adversely affect protected and sensitive species including bats, birds, reptiles and small mammals.

Additional risks include habitat degradation from trampling and informal path creation, hydrological and water quality impacts from increased runoff and pollution, and the introduction of invasive species. Given the limited size of the reserve, proposed buffer planting would be insufficient to mitigate these impacts.

The proposal would also undermine the reserve's value as an educational and wellbeing resource for the local community. Overall, the scale and proximity of the development would result in

unacceptable ecological harm that cannot be adequately mitigated and should therefore not be supported.

9. Prematurity and Neighbourhood plan status

The adopted Bloxham Neighbourhood Plan (NP1) forms part of the statutory development plan and must be given full weight in decision-making in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004.

The Draft Modified Bloxham Neighbourhood Plan (NP2) is at an advanced stage of preparation, having completed Regulation 14 consultation and currently undergoing Regulation 16 consultation by Cherwell District Council, which concludes on 1 February 2026.

In these circumstances, the Local Planning Authority must consider the principle of prematurity, as set out in paragraphs 49 and 50 of the National Planning Policy Framework (NPPF). Paragraph 49 confirms that weight may be given to relevant policies in emerging plans according to their stage of preparation, the extent of unresolved objections, and their consistency with national policy. Paragraph 50 further recognises that refusal may be justified where a proposal is of such scale or cumulative impact that granting permission would undermine the plan-making process by predetermining decisions central to the emerging plan.

The proposal for up to 95 dwellings is of a scale and nature that would fundamentally undermine the emerging Neighbourhood Plan by predetermining the location, scale and distribution of housing growth in Bloxham. The Parish Council considers that the application has been deliberately brought forward to secure permission prior to completion of the neighbourhood planning process.

The applicant has not engaged with the Parish Council regarding this proposal. However, it would have been fully aware of the advanced status of the Draft Plan at the time of submission. Granting permission would prejudice the outcome of the plan-making process, undermine community confidence, and risk derailing a Plan which is close to examination and referendum.

For these reasons, the Local Planning Authority must apply paragraphs 49 and 50 of the NPPF and give significant weight to both the adopted and emerging Neighbourhood Plan policies.

10. Conclusion

The Parish Council concludes that the proposal:

- conflicts with the spatial strategy and policies of the Bloxham Neighbourhood Plan
- represents inappropriate development outside the Settlement Boundary
- poses unacceptable flood risk and highway safety impacts
- undermines valued recreation land and community infrastructure
- would cause material harm to village character and settlement form
- would cause significant harm to the Slade Nature Reserve
- would prejudice and undermine the emerging Bloxham Neighbourhood Plan at an advanced stage of preparation, contrary to the NPPF and section 38(6) of the Planning and Compulsory Purchase Act 2004

For these reasons, Bloxham Parish Council recommends that planning permission be refused.



Appendix A

Drainage Network and FRA Commentary

Section 3.5.1

This section fails to identify the ownership of a critical section of the drainage network running along Hyde Grove. At the junction with Brookside Way, longstanding settlement issues around the manhole have remained unresolved due to unclear responsibility.

Proceeding without clearly defined ownership and maintenance responsibility represents a significant risk to long-term drainage performance.

Section 3.5.3

Two manholes are referenced in this section. In the first case, the FRA omits reference to Appendix B, which confirms that the manhole on the site's northern boundary could not be opened during investigation works.

In the second case, the FRA assumes the identity of a manhole shown on the Thames Water Asset Plan without verification. Together, these points reinforce the concerns raised in Section 3.5.1 regarding uncertainty within the drainage network.

Section 3.6.2

The site investigation was undertaken during the hottest summer on record, at a time when rainfall levels were substantially below normal. This calls into question the applicability of infiltration and groundwater data collected under atypical conditions.

Section 4.1.1

This diagram identifies the attenuation pond associated with the Miller Homes development on Tadmarton Road. During Storm Bert, this pond was observed to be effectively empty due to

reported pump failures and equipment deficiencies, resulting in surface water discharging directly into Bloxham Brook and contributing to the observed rise in water levels.

Sections 4.1.2 and 4.1.3

Much of the behaviour illustrated within these diagrams was directly experienced during Storm Bert. The disparity between observed flood behaviour and modelled assumptions significantly undermines confidence in the projections. In circumstances such as these, greater weight should be afforded to observed events rather than theoretical modelling.

Section 4.2.1

The flood mapping presented is questionable in both accuracy and applicability. Photographic evidence from the day following Storm Bert demonstrates flood extents significantly beyond those shown. Although water levels had already receded at the time the photograph was taken, saturation remained extensive.

Floodwater would clearly have extended further into the application site than indicated in Section 4.2.2.

Section 4.2.3

This diagram contains several substantive flaws:

- it identifies a high flood probability on the William Davis site, with flows subsequently directed towards the recreation ground and application site via installed drainage;
 - it materially underestimates the size of the flood ponding observed on the recreation ground; and
 - it significantly underestimates flooding experienced on Tadmerton Road during Storm Bert.
- **Section 4.4**

The Oxfordshire County Council Section 19 Flood Investigation Report (July 2025) identified sewage flooding during Storm Bert, with additional events reported subsequently. This indicates that Thames Water does not currently have a complete understanding of foul sewer performance within the village.

Sections 4.4.4 and 4.4.5

Given the acknowledged limitations of available data, the absence of recorded incidents in these sections cannot reasonably be taken as evidence that risk does not exist.

Section 4.6.1

The mapping presented appears incomplete, with flood data either missing or incorrectly overlaid. The Section 19 report and extensive photographic evidence clearly demonstrate widespread flooding, including along South Newington Road.

It is also noted that the Environment Agency issued a flood alert for Bloxham Brook on **11 November 2025**, confirming the EA's recognition of flood risk in this area.

Section 4.10

During Storm Bert, water levels in Bloxham Brook were within approximately **100–150mm** of overtopping at Hyde Grove. This raises serious concerns regarding the suitability of this route as a safe means of access and egress during flood events.

Sections 5.3.1 and 5.7.1

The absence of a finalised development layout introduces significant uncertainty. Furthermore, the assumption that infiltration will remain effective on saturated and waterlogged ground is not supported by recent experience, during which parts of the village flooded repeatedly between September 2024 and January 2025.

Section 5.8.1

Based on observed events, exceedance of the design storm should be treated as a **realistic and significant risk**. In such circumstances, excess water would discharge via the sewer under Hyde Grove and overland flow routes, with cumulative contributions from both this site and the William Davis development entering Bloxham Brook upstream of the monitoring station.

During Storm Bert, water levels exceeded several bridge soffits, resulting in significant localised flooding. The proposed exceedance assumptions would materially worsen this situation.

Section 7.1.1

Identification of a maintenance body alone does not ensure effective long-term operation of SuDS infrastructure. Robust arrangements must include programmed maintenance, independent inspection, and legally and financially secured mechanisms over the lifetime of the development.

Sections 8.9 and 8.10

Based on the evidence presented, the development would not merely have the potential to increase flood risk elsewhere in the village but would be highly likely to do so.

The reference to “Hydro Grove” in Section 8.10 is unclear and requires clarification.



Appendix B

Flooding Evidence

This appendix provides photographic evidence of flooding experienced across Bloxham during Storm Bert (November 2024)



Figure: David Tyrrell Recreation Ground fully inundated during Storm Bert, with pavilion surrounded by floodwater



Figure: Floodwater ponding across open land adjacent to the recreation ground, demonstrating exceedance beyond mapped extents



Figure: View from residential property showing floodwater extending across the recreation ground toward garden boundaries



Figure: Surface water and sewer surcharge emerging through the carriageway in a residential street during Storm Bert



Figure: Continued sewer and surface water discharge onto the highway, creating hazardous conditions for vehicles and pedestrians



Figure: Children's playground with floodwater encroaching toward residential boundaries



Figure: Floodwater overtopping land near boundary fencing, indicating widespread ground saturation

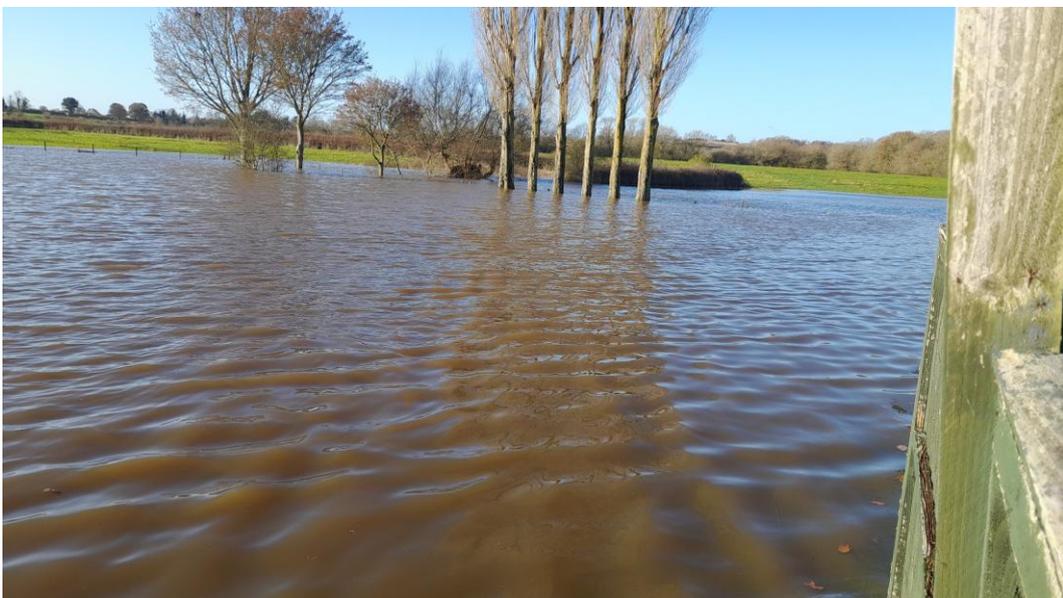


Figure: Standing floodwater across fields adjacent to the recreation ground, illustrating prolonged inundation after peak rainfall



Appendix C

Traffic Assessment – Summary

Traffic data has been collected using a **Westcotec Vehicle Activated Sign (VAS)** located on South Newington Road adjacent to the entrance to the David Tyrrell Recreation Ground. Data was recorded over a two-month period spanning September, October and November and provides an objective basis for assessing highway risk associated with the proposal.

The data presented represents either a typical selected week or the full sample period.

Key findings include:

- approximately **267,000 vehicle movements** northbound into the village, equating to average daily volumes of around **4,100 vehicles**;
- **peak hourly flows** equivalent to one vehicle every **10 seconds** northbound;
- an **average speed of 30.2mph**, with approximately **50% of vehicles exceeding the posted speed limit**;
- an **85th percentile speed of 36.6mph**; and
- a **maximum recorded speed of 65mph**.

Access

The primary access to the proposed development is located immediately beyond a right-hand bend on the approach to the village along South Newington Road. Although the posted speed limit is 30mph, vehicles are observed to be decelerating from a 50mph zone and frequently remain above the limit at this location.

Traffic exiting the village southbound accelerates from a village-wide 20mph zone into a 50mph zone on a route that carries significant volumes of passenger vehicles and HGVs. Approximately **7,000 vehicles per day** enter the village from the north on the A361.

Vehicles exiting the proposed site would be required to merge with fast-moving traffic from both directions and interact with vehicles exiting the approved William Davis development opposite, creating compounded safety risks.

Traffic Volumes

Average daily northbound traffic volumes are approximately **4,171 vehicles**, with higher volumes observed on Thursdays and Fridays when flows exceed **4,500 vehicles per day**.

Peak hourly flows between **07:30 and 18:30** range from **250 to 390 vehicles per hour**, equating to vehicle movements at intervals of less than ten seconds. Even off-peak daylight hours consistently exceed **250 vehicles per hour**.

When combined with southbound traffic volumes, this confirms that South Newington Road is both heavily trafficked and fast-moving. Introducing additional access points onto this route is therefore problematic.

Vehicle Speeds

The average northbound speed of **30.2mph** is notable given the posted 30mph limit and illustrates the difficulty faced by drivers attempting to enter the carriageway from a stationary position.

Speed distribution data shows that approximately **50% of vehicles exceed the speed limit**, with recorded speeds ranging up to **65mph**. Of the **267,135 vehicles** measured during the sample period, **133,349 vehicles** exceeded the 30mph limit, with over **12,000 vehicles** travelling at speeds above 40mph.

It is also relevant that these speeds were recorded only **50 metres from the start of the village-wide 20mph zone**, introduced specifically to enhance road safety.

The persistent differential between average speed and the 85th percentile speed demonstrates systemic non-compliance rather than isolated behaviour.



Appendix D

Effects on The Slade Nature Reserve

The impact of building 95 new houses next to The Slade Local Nature Reserve (LNR) will be significant, primarily due to the increased footfall around and within the reserve. While access to nature is fundamental to our health and wellbeing, it can lead to negative impacts on nature conservation. People's access to nature can lead to physical damage as detailed in the notes below.

The Slade is fragile in nature due to its small size combined with a high diversity of habitat types. It relies on the suitability of the surrounding countryside to support its biodiversity. This planning proposal will effectively cut off the LNR, removing its ability to support the wide range of species that it currently does.

Likely Impacts on The Slade Local Nature Reserve

1. Habitat Loss and Fragmentation (Indirect)

- Reduce buffer zones that protect sensitive habitats. Although the proposals include a few metres of buffer zone planting this is not going to mitigate the effects.
- Increase edge effects (light, noise, trampling).
- Disrupt wildlife movement corridors. Many species (e.g., bats, hedgehogs, reptiles, ground-nesting birds) depend on connected habitats.

2. Increased Disturbance from People and Pets

An additional 95 households adjacent to The Slade will significantly increase footfall. This impact will be exacerbated as residents will wish to use The Slade as a cut through route from the new housing estate on the Tadmerton Road on the northern boundary of the LNR. Whilst larger nature reserves may be able to sacrifice a small proportion of habitat for footpaths, The Slade is so small and any losses make up a much larger proportion of the site.

Impacts include:

- Loss of habitat due to trampling of vegetation and children building dens.
- Soil compaction.
- Disturbance to ground-nesting and sensitive birds.

- Increased dog walking → nutrient enrichment from dog fouling and greater risk of wildlife disturbance.
- Loss of habitat due to path widening or creation of informal paths.
- Increased presence of litter.
- Increased instances of fires.

3. Noise, Light and Visual Pollution

Higher levels of:

- **Artificial lighting** (streetlights, garden lights) will affect bats, insects, birds.
- **Human noise** reduces breeding success in sensitive species. Bats are especially protected in UK law, and lighting near their commuting corridors is a major concern.

4. Predation by Pets

- Domestic cats can have a strong negative effect on small mammals, reptiles, amphibians, and birds.
- Increased risk to species already stressed by habitat disturbance. Mitigation such as cat-proof fencing is not an acceptable solution.

5. Hydrological and Water Quality Impacts

New housing increases:

- Surface runoff
- Pollution risks (from roads, gardens, chemicals)
- Changes in water table or drainage patterns
- Increased risk of obstructions being created in the watercourses which may affect the flow of water into the village. This can alter wetland habitats, ponds, or streams inside the LNR.

6. Invasive Species Spread

Disturbed land and new gardens increase the likelihood of invasive non-native plant and animal species establishing in the LNR.

7. Impact on Valuable Local Educational and Public Health Resource

Loss of habitat and species diversity will reduce the opportunities to use the LNR for educational purposes. The Warriner School utilise the site as part of their monthly Wild About Bloxham club for local children between the ages of 8 and 12.

Local nature lovers and dog walkers enjoy the secluded and quiet nature of the space which will be lost with increased access.