

5. CONSIDERATION OF ALTERNATIVES

Introduction

- 5.1 This Chapter outlines the main alternatives of this scheme considered by the Applicant and key reasons as for proceeding with the Proposed Development.
- 5.2 Regulation 18(3)(d) of the EIA Regulations requires that an ES includes *“a description of the reasonable alternatives studied by the developer, which are relevant to the Proposed Development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.”* This is expanded at Schedule 4(2) which highlights that the ES should include *“a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”*
- 5.3 The EIA Regulations do not require the full assessment of all potential alternatives, only a reasonable account of those actually considered by a developer prior to the submission of the planning application.
- 5.4 The alternatives that have been considered in this chapter include:
1. Alternative Sites;
 2. Alternative Designs; and
 3. The ‘Do Nothing’ Scenario

Alternative Sites

- 5.5 An Alternative Sites Assessment (ASA) has been undertaken, which has been submitted as part of the planning application.
- 5.6 There is currently no relevant planning policy regarding the location of sports stadiums, and there is no policy guidance for undertaking an assessment of alternative sites. However, relevant case law in respect of stadium development has been reviewed as the availability of alternative sites is often a material consideration in the determination of those cases. Whilst there is no consistent approach taken by Appellants in the cases, the Brighton and Hove Albion appeal decision provides a useful benchmark for assessing alternative sites as it provides an in-depth analysis, and an Inquiry took place solely on the approach to assessing alternative sites. The Secretary of State set out key criteria to be considered. Whilst these criteria do not form planning policy or guidance, they have informed key questions that have been asked within the ASA:
1. Is the site acquisition a realistic proposition?

2. Is the site large enough for the stadium and required parking/circulation?
3. Can a stadium be built without incurring unaffordable development costs?
4. Any overriding site specific planning issues?
5. Is the site accessible by sustainable modes of transport?
6. Can a stadium be built without any unacceptable environmental or visual impact?

5.7 These questions are considered to provide a robust assessment to understand whether there are any alternative sites that are practical, realistic and feasible to accommodate a proposed stadium development. In line with the EIA Regulations, these questions also allow a comparison of the environmental effects of alternative site options.

Area of Search

5.8 OUFC will need to obtain approval from the Board of the English Football League (EFL) for any relocation of the Club's stadium to a new site, who will take into account the location of the stadium before any consent is granted, against the EFL Regulations. The EFL Regulations require that the location of any new stadium remains linked to the City of Oxford. The EFL have confirmed that if the Club proposed a site that was not within or within close proximity to the City of Oxford, they would unlikely give consent for the move. This would result in a position where the Club would have to be renamed, removed from the league and would have to start again at the bottom of the football pyramid. This would not be a viable option for the Club.

5.9 Under the current Regulations, the furthest a club has been provided consent by the EFL to relocate its stadium was in the case of Bolton. The proposed new stadium was approximately 7 miles from the old ground site and 5 to 6 miles from the city centre of Bolton. Whilst the suitability of site from the EFL perspective is more to do with the relationship and links to Oxford, a search radius of 7 miles from Oxford City Centre was deemed appropriate in the context of the above as the starting point for the search.

Approach to Assessment

5.10 A phased approach to assessing alternative sites was undertaken. An initial assessment was undertaken by Savills, which provided an initial review of sites within the 7-mile radius. This assessed a total of 64 sites (42 non-allocated and 22 allocated sites) and considered the site area, landowner intention, accessibility, viability and any key constraints. An initial planning appraisal was then undertaken of these sites which reviewed the planning policy context and planning history of each site. Where specific constraints were identified, further assessment work was undertaken by specialist consultants in respect of these issues, namely landscape and visual impact, heritage impact and flood risk. In combination with the initial planning appraisal, this work assessed the environmental effects of each of the alternative site options.

- 5.11 Finally, the assessment work was pulled together with a conclusion made in respect of the questions identified above. The key question for the assessment of environmental effects is question 6 and a ranking system was adopted (green, amber and red) depending on the level of effect and whether this could be overcome through mitigation.
- 5.12 The conclusion included an overall judgement on the suitability and availability of each site, which also included a comparison against the Site.

Summary of Assessment

- 5.13 Based on the methodology adopted, the ASA demonstrates that there are no other feasible, practical and realistic alternatives to the Site to accommodate a proposed stadium development within the area of search identified through discussions with the EFL.

Alternative Site Layouts/Design

- 5.14 The approach to the design has evolved throughout the pre-application process. This section summarises how the design of the Proposed Development has evolved and how environmental considerations have influenced the final design.
- 5.15 As set out in **Chapter 2**, significant community and stakeholder engagement has been undertaken which has informed the design evolution. A Statement of Community Involvement (SCI) accompanies the planning application which sets out feedback received through this engagement. The design of the Proposed Development has evolved in response to this stakeholder engagement, as well as technical studies which have informed the environmental constraints and opportunities. Pre-application discussions have been undertaken with the LPA and the Design Review Panel. Therefore, a design process has been undertaken where 'alternatives' have been inherently considered and disregarded.

EIA Design Evolution

- 5.16 Given the scale of the Site, at the outset of the development a number of key constraints were identified. This includes:
- Green Belt designation;
 - Area at risk of surface water flooding in the northern part of the Site;
 - Gas Main and Overhead Power Cable in the northern part of the Site;
 - The woodland to the south of the site, which is priority habitat, and vegetated boundaries; and
 - The Site's relationship with the adjacent site allocations and transport infrastructure.

- 5.17 Following the constraints analysis, an initial masterplan was prepared and discussions were undertaken with the technical team and Applicant as part of an iterative process, and a degree of layout evolution has occurred in response to environmental considerations. This evolution has been informed by both the Applicant’s aspirations for the Site, as well as continuous engagement from the technical team, with the aim of avoiding and minimising adverse significant effects through design.
- 5.18 The Design and Access Statement prepared by AFL Architects provides further detail on the design process of the Proposed Development. However, **Table 5.1** outlines key design influences that have informed the proposed layout and development proposals, including any decisions made.

Table 5.1: Key Design Influences/Decisions

Design Influences/Key Decisions	Comment
Stadium Location	The design of the proposals has been strongly influenced by the landscape and visual baseline analysis and has evolved to minimise the effects as far as possible. The inherent design mitigation that has informed the site layout includes locating the stadium building as far south within the Site as possible, without impacting on the existing woodland block in the south of the Site. This protects this key landscape feature that is designated as a priority habitat under Section 41 of the NERC Act, whilst retaining an open green space in the north of the Site to maintain an open green space between the Proposed Development and the southern edge of Kidlington. Locating the stadium further north would impact on the maintenance of a green barrier between Kidlington and Oxford, and locating it further south would impact the woodland to the south. Both would have a greater environmental effect.
Stadium Orientation	Differing stadium orientations bring with them their own list of pros and cons, relating to camera locations, position of the ‘main stand’, relationship to the site, transport links and site dimensions. Hospitality seats and camera locations would always be facing away from the evening sun, this in turn dictates where the main stand is located. The site size and shape has influenced the decision on the stadium orientation. An optimum orientation has been achieved for the site, which looks to orientate it on a north-west/south-east axis, providing sufficient space around the Stadium, whilst ensuring that the main-stand has a better relationship to the arrival spaces from Oxford Parkway to the south-east.
Stadium Design	Key guidance and regulations, including the Green Guide and UEFA Stadium Infrastructure Regulations determine the size of the stadium and associated infrastructure required to deliver a stadium of this size. The Green Guide sets parameters for a number of areas including calculating the safe capacity of a sports grounds; management responsibility and planning for safety; circulation, including ingress, egress, vertical, concourses and vomitories, barriers and separating elements; seating accommodation; standing accommodation; demountable structures; fire safety; communications and control; mechanical and electrical installations; medical and first aid provision and media provision. The UEFA Regulations provide criteria for the field of play, outside broadcast and parking requirements. In order to create a viable stadium that meets the needs of OUFC, and the community, there are certain spaces that are required; in particular, the hotel, hospitality/event spaces and the commercial provision. Furthermore, due to conditions in the land ownership, the scheme must be one singular building. The height and the mass of the stadium has been dictated by these operational

	<p>requirements. However, detailed design of the building is informed by the landscape and visual opportunities and constraints. The proposed building facades will comprise of materials, finishes and hues which are evident in the local landscape and townscape and of relevance to the Club. Whilst the desire for a 360 degree seating bowl was set by OUFC, this also has environmental benefits in helping to mitigate noise and light spillage.</p>
Access and Movement	<p>OUFC has provided home fan travel survey data from the 21/22 season and the 22/23 season available which includes fan home postcodes. This primary data has been used as the basis for the technical work in terms of origins and destinations.</p> <p>The survey data collected and summarised above underpins the proposed Transport Strategy which aims to promote sustainable travel to fundamentally change the travel behaviour of supporters from driving in a private car to travelling by public transport, walking and cycling.</p> <p>A number of sustainable transport measures have been proposed. Alternatives solutions have been considered by the design team and through consultation with other stakeholders. The proposed access strategy has been informed by Transport Assessment work (including pedestrian modelling), and includes a number of match-day measures, including shuttle buses and Variable Message Signage. Consideration was given to alternatives; however, it was determined that without these measures, there would be a far greater impact on the local highway network, as well as pedestrian safety, as supporters would not be able to flow freely from the Stadium and access Oxford Parkway.</p>
Relationship to surrounding allocations	<p>Whilst the site is currently located adjacent to agricultural uses, a large amount of land within the vicinity of the site is allocated for development. The Proposed Development looks to connect with the future development sites, by providing an east-west walkway to link the land to the east of the Site within the PR7A allocation and PRow 229/4/30 to Stratfield Sports Ground to the west, including enhanced pedestrian crossings over Oxford Road and Frieze Way.</p>
Landscape Design	<p>The location of the open spaces within the Site has been dictated by the retention and protection of the existing trees/landscape features, where possible. New planting will be selected to create a strong and legible landscape structure and will include a broad range of species to improve the biodiversity and resilience of the planting to climate change.</p>
Ecological Requirements	<p>Detailed ecological surveys have been carried out on the site. These have highlighted that the willow plantation, neutral grassland and scrub habitats are considered generally to be of relatively limited intrinsic ecological value. The areas of greater ecological interest within the context of the Site include the hedgerows and the adjacent (off site) broad-leaved woodland. The results of the survey were used to develop the ecological enhancement measures. One of the drivers has been to achieve a minimum of 10% biodiversity net gain on-site and the survey work has informed the design of the Proposed Development, the drainage strategy and landscape strategy.</p>
Drainage	<p>A coordinated 'Green and Blue Infrastructure' approach is proposed which incorporates rain-gardens, attenuation basins and swales, reducing the amount of crates required for attenuation. Working alongside the engineers and ecologists the green and blue infrastructure acts on multiple levels, providing sustainable drainage, biodiversity net gain and generates an aesthetically pleasing space.</p>

The 'Do Nothing' Scenario

5.19 The 'Do Nothing' scenario would result in the Site remaining in its present condition. In this scenario, the baseline conditions identified within this ES would remain largely as described, and the effects identified during the construction and operational phases of development would not arise. The opportunity to take advantage of the sustainable location would not be realised and the benefits of the Proposed Development, for OUFC, the economy and the community, would not occur.