i. The ecology report understates both the level and abundance of biodiversity that exists on the site and on the adjacent woodland to the south. (NOTE: this woodland is adjacent to the site, not part of it but will be impacted).

j. There is no plan for ongoing management for diversity, any plan would be dependent on the financial security of OUFC which is not a certainty.

k. There is evidence the woodland to the south of the site is in fact Ancient Woodland and it requires more protection than is currently planned, including an appropriate buffer zone. This strip of woodland is included in the proposed Nature Recovery Network for Oxfordshire by Thames Valley Environmental Record Centre (TVERC) as part of a 'Core Zone' ie of the 'highest nature value', existing wildlife areas.

l. Bats, including rare species such as Barbastelle, use the site, particularly the southern area by the woodland. This woodland contains many bat roosting opportunities. An independent ecologist's report by Dr Judith Webb records 161 invertebrate species including 42 beetles, 17 butterflies, 7moths,1 lacewing, 4 dragonflies & damselflies, 20 true bugs, 17 bees & ants & wasps, 1 sawfly, 6 grasshoppers & crickets, 30 true flies, 2 molluscs, 14

[redacted]

maximise biodiversity on the site, especially of flowers and invertebrates. Willow can support a big total of invertebrate species; one quote is up to 450 dependent species, which will include: bugs, bees, beetles, flies and moths.

n. In her report on the woodland Dr Webb also explains the important inter-relationship between the woodland and the site which would be completely lost as a result of the development. As Dr Webb observed, insects which breed in the woodland will be using flowers on the site as a food source.

o. The proximity of the development including the car park, the southern area and the stadium itself to the woodland is a serious concern. Destruction of woodland can occur by development near or immediately adjacent as a result of hydrology change, light pollution, noise pollution, too much public access and trampling of flora, litter, flower-picking/digging, fires destroying trees or deadwood. There is an obvious potential for all of these dangers to the woodland and the protection measures as currently planned are grossly inadequate. The planned deterrent to entering the woodland will be a hedgerow (as yet to be planted), scrub planting and attenuation features. This will be ineffective with 16,000 people onsite.

p. Impact on trees
The proposal will result in the total loss of 17 trees; 5 groups of trees and the partial loss of 2 groups of trees. The protected and biodiverse woodland to the south of the development will be adversely affected by pollution, light, noise etc

Measures to 'deter' access are totally inadequate. Large numbers of people onsite will inevitably lead to overspill into the woodland. The planned deterrent to entering the woodland will be a hedgerow (as yet to be planted), scrub planting and attenuation features. This will be ineffective with 16,000 people onsite.

Two oaks with Tree Protection Orders (TPOs) are planned for removal to allow access. These have bat roosting potential and are protected by TPOs for a reason and should therefore remain.

5. Drainage and flood risk
a. The site is susceptible to significant surface water flooding. In recent wet weather (end of 2023/early 2024) the site has acted as a holding area for vast quantities of water, and has absorbed run-off from the Oxford Road during heavy rain.
b. The stadium development will mean that run-off from the Oxford Road has to go elsewhere and this could result in the road and other local flooding.
c. What will the cumulative effect of the developments in the area have on flooding? This will become more important as climate change progresses

6. Design, appearance and materials

a. The Design and Review Panel report says: "there is a general feeling that everything is ever so slightly squeezed and that there is no spare land." This is clearly overdevelopment in an attempt to fit too much onto a constrained Green Belt site.

b. At nearly 25m high the stadium will dominate the landscape and will be obtrusive in what