

Comment for planning application 24/00539/F

Application Number	<input type="text" value="24/00539/F"/>
Location	<input type="text" value="Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station Oxford Road Kidlington"/>
Proposal	<input type="text" value="Erection of a stadium (Use Class F2) with flexible commercial and community facilities and uses including for conferences, exhibitions, education, and other events, club shop, public restaurant, bar, health and wellbeing facility/clinic, and gym (Use Class E/Sui Generis), hotel (Use Class C1), external concourse/fan-zone, car and cycle parking, access and highway works, utilities, public realm, landscaping and all associated and ancillary works and structures"/>
Case Officer	<input type="text" value="Laura Bell"/>
Organisation Name	<input type="text" value=""/>
Address	<input type="text" value=""/>
Type of Comment	<input type="text" value="Objection"/>
Type	<input type="text" value="neighbour"/>
Comments	<input type="text" value="Please see attached four documents related by subject area"/>
Received Date	<input type="text" value="19/03/2024 23:07:01"/>
Attachments	<p>The following files have been uploaded:</p> <ul style="list-style-type: none">• Planning Application Green Belt.pdf• Planning Application Energy.pdf• Planning Application Transport.pdf• Planning Application Economy, Biodiversity, Construction.pdf

Planning Application 24/00539/F

Deadline for responses 3 April 2024

Target Decision date 21 June 2024

To Whom it May Concern

Planning Response Number 4

Having read the planning application for the stadium at the triangle in Kidlington we have the following concerns:

Democracy

A Parish Poll was held on 10 May 2023 on the question *Should Kidlington Parish Council support the building of a stadium for Oxford United Football Club in Kidlington?* The Poll was called by a group of residents, not by the Parish Council. The status of the Poll is advisory:

Out of a total 10,022 Kidlington electors, 928 voted YES and 2,073 voted NO. The turnout was 29.99%. Although it did not call the poll, the Parish Council views the result as significant, and thanks the residents who turned out to vote.

The poll result is more or less in line with that of the County Council's online survey more than a year ago, in which out of 822 local respondents 38% were in favour of negotiating with the Oxford United and 58% were against. Given this, and the fact that Councillors are elected democratically, where is the justification in their support to move this forward?

Biodiversity Net Gain

The claims that this site is not already highly biodiverse or biodiversity neutral are false. The site is rich in biodiversity including but not confined to, great crested newt, badgers, and bats. These are protected species. Since it is now universally accepted that the monitoring equipment installed at the site to detect bats was removed very shortly after it was installed, there has been no effective survey conducted. Absence of evidence is not evidence of absence. This is legal requirement in such an area.

What are the new and improved habitats? "The vision has been to incorporate flexible multi-functional spaces, monocultured (and aesthetically pleasant trees and shrubs) that can be enjoyed whether it be a match day or not". Biodiversity is not about giving wild lands over to public wanderings.

In what reality can the building of a concrete mass on this site add 10% net biodiversity gain? That makes a false assumption that the site currently has no biodiversity which is absolutely not the case. Planting monocultures bears no resemblance to the biodiversity currently in situ.

Construction

The talk of Route Map for Avoidable Waste in Construction would be far better met by not constructing and instead coming to a business arrangement with Mr Kassam to build a fourth stand at the Kassam and upgrade facilities there.

Economic

Given this is a site relocation, of the £27m alleged annual contribution to the economy, how much of this is simply being diverted from the existing football club at Kassam, and what proportion is being given to the local Councils to invest locally, other than 1% of this for (£280k) business rates?

Flooding

The favoured hard landscaping option (4.3) is asphalt. This will do nothing to allow excess water absorption.

Kidlington until the early 2000's used to flood, and Environment Agency (EA) controls were installed.

These have not been upgraded and there is no national budget to do so. The build of this concrete mass (on a preferred asphalt surround), will only serve to move flood waters closer to residences, how is this to be avoided?

Carbon Reduction Pledges

The summary claims a 51% CO2e reduction by moving to Stratfield Brake. The stadium is not being built at Stratfield Brake, so how is this relevant?

The 'what if' reductions discussed in this Sustainability Statement, are exactly that, what ifs and pipe dreams. What if the stadium were to be built to Olympic standards or to BREEAM Outstanding and confirmed as this, not set out as an aspirational goal to be diluted if they use too much capital and start to look like they might not be **'economically viable'**.

By simply asking the question 'what if?' They are failing to make any pledges or demonstrate any evidence of agreed and firm CO2e reduction actions or means thereof.

Yours faithfully



Resident and local Company Director

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Planning Response Number 2

Having read the planning application for the stadium at the triangle in Kidlington we have the following concerns:

Energy Efficiency

“The stadium will be constructed to achieve the highest economically viable energy efficiency and be designed to maximise the delivery of decentralised renewable or low-carbon energy generation. A feasibility study of the Low and zero carbon technologies has been undertaken as part of the drive towards achieving carbon neutrality. The stadium will aim to reduce energy use and carbon emissions through the use of energy efficient equipment and Low and zero carbon technologies”.

This entire statement is made meaningless by the phrase: achieve the highest **economically viable** energy efficiency.

This pledge is further watered down in the Sustainability Statement 1. Introduction. This states that the BREEAM target for this build is just ‘very good’ (therefore highest possible would be 64.96%).

BREEAM targets are aspirations. When the ambition is as low as this, (in BREEAM terms, anything greater than 55% is ‘very good’), there is no confidence in these boasts. Nothing shy of outstanding (> 85%) makes this both unsustainable and derisory. Given its proximity to a railway station, this site already scores BREEAM points with no effort.

Trumpeting about their BREEAM “very good” ambition, whilst omitting to mention the embedded carbon in the building they propose to demolish for this unnecessary new build, is far away from the boasts of OUFC in their earlier marketing that spoke of creating a “best in class sustainable stadium facility”.

<https://oufcstadium.co.uk/wp-content/uploads/2023/10/Creating-a-new-home-for-Oxford-United-3.pdf>

As councils leading by example, there is an absolute need to avoid new build where we can. Refurbish. Convert. Retrofit. Demolition as very last resort.

Oxford City Council require for 20% of total energy requirements, both unregulated and regulated to be met from on-site LZC or low carbon technologies. There is therefore limited ambition here.

“Together these renewable and low carbon technologies will maximise energy efficiency”.

Renewable energy generation has nothing to do with energy efficiency.

The statement of ‘ambitions’ says:

“What if all electricity used to be from renewable sources”.

This could not be delivered from a 3,000m² array on site, even if the whole of that array covered the entire area (limiting any suggested green roof potential). This is because solar power does not generate on match nights or effectively during the winter. Simply buying green energy is off-setting and far away from the promises being made here.

Page 113 (24) of the Sustainability Statement suggest that PV generation (table 9) will generate 17.92kWh/m²/year. On 3,000m², that is just 53,760kWh per year.

Effectively equivalent to the consumption of perhaps 13 average UK semi-detached houses. A very small solar array given the size of the claimed available roof space.

What is the actual renewable energy generating install that will be installed on this site and how much electricity will it generate compared to the planned site electrical consumption in kWh?

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Planning Response Number 3

Having read the planning application for the stadium at the triangle in Kidlington we have the following concerns:

Green Belt Gap Justification

The existing Kassam stadium has a capacity of 12,500 with only three (not four) stands. When first planned in 1995 it was to have a 16,000-seat capacity. However, by the time the stadium opened, OUFC were playing in a lower division, so the smaller capacity was deemed adequate at completion in 2001. Foundations are already in place for a fourth stand at this site.

At no point in the intervening 23 years have OUFC commanded a capacity crowd. Highest ever attendance was just 12,243. The Sustainability Statement talks of carbon reductions and of stadium considerations over a 'over a 60-year lifespan". So why is Kassam being written off having only achieved just over 1/3rd of this life?

The stated justification for the change of stadium was given as a contractual disagreement with Mr. Kassam and a need to be out of the ground by 30 June 2026. This would provide insufficient time to complete a Stadium at this ground.

This disagreement with Mr. Kassam (albeit apparently the alternative site assessment discloses that United are restricted under the terms of their current licence agreement at the Kassam, to use it for first team league and cup matches, some friendly games, and specified testimonial matches), is a contractual business issue.

This is no concern of the Local Councils and one that could be reasonably resolved by negotiation. The sustainability of the region, the sanctity of the green belt, site biodiversity, the will of the vast majority its residents, should not be overturned by the wishes of a wealthy Indonesian Palm tree plantation grower, simply because it is inconvenient to negotiate with Mr Kassam – and perhaps take a stake in the Kassam (ala Ratcliffe and Manchester United), and then, if there really is a need for more seats, to build the fourth stand on the foundations provided.

The sustainability of demolishing a perfectly functioning 23-year-old concrete stadium and replacing it with a new one, outside of the City of Oxford is directly at odds with all Oxfordshire Councils Climate Crisis promises.

Planning Statement page 69: The failure of OUFC to negotiate a licence or contract with Mr Kassam with any form of longevity in mind, given the expected 60-year life of this stadium is a dereliction of company director duties.

It is not the role of Councils or the Kidlington public to remedy this. This business decision alone is being used to justify the encroachment and building on green belt, something that requires very special circumstances' to be demonstrated in order for it to be justified. **Where is the evidence that all business and arbitration avenues have been exhausted?**

The question follows, if Mr Kassam has no interest in using this stadium for its stated purpose, as a businessman, it is likely to be demolished for change of use. Since the Oxfordshire Councils seem overly keen to be involved in these business discussions, they should be making clear what is proposed on this site once demolished.

Planning Statement Feb 24 states: 9.6. "In terms of assessing proposals affecting the Green Belt, Paragraph 152 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".

Further: "Paragraph 153 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations", it goes on to say that "the proposals are identified as having an impact on the Green Belt's openness and conflicting with several of the purposes of including lands within it.

Consequently, in terms of paragraphs 152 to 154 of the NPPF, the proposals are inappropriate development and **there is a need for 'very special circumstances' to be demonstrated in order to justify the proposed development in the Green Belt"**.

The case studies set out in the application to justify these '**very special circumstances**' are far from relevant here.

Specifically: Newcastle Falcons in 2002, did not occupy a 23-year-old stadium with potential to expand to 16,000 seats. Nor are OUFC members of the Premier league.

Brighton and Hove Albion: Case was called in, in 2001 and took until 2005 for the secretary of state to judge in their favour, only for this to be quashed in 2006 and not finally approved until 2007. In this case, OUFC would be without a stadium until 2031. OUFC really should be building relationships with Mr Kassam.

Southend United was viewable from, not built in, the green belt in 2008.

Each of these cases happened close to 20 years ago and the recognition of climate change as a clear and present danger or 'emergency' as stated by all Oxfordshire Councils was not recognised or endorsed by said Councils. There were no alternate

sites in these locations. There are 42 being considered in Oxfordshire, 8 of which not in the green belt. The Kidlington site is not in Oxford.

As such, if this decision is to be progressed, it needs to go to the secretary of state for review.

Yours faithfully

A solid black rectangular box used to redact the signature of the Resident and local Company Director.

Resident and local Company Director

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Planning Response Number 1

Having read the planning application for the stadium at the triangle in Kidlington we have the following concerns:

Traffic and transport

The planning statement anticipates that 580 events will be hosted each year at the stadium and proposes a stadium with 18,000 seats and lounge access for 1,000 guests. Parking at this site will be available for only 184 spaces, of which 78 will be accessible and 25 lost to broadcasters (this includes hotel guests).

Of the 24 teams in League One, where Oxford United play, most would find it challenging to travel by train. There is no evidence that this form of transport (which is the sustainability claim of the application), would result in majority supporters taking rail transport to the ground. With effectively 81 car park spaces to accommodate 18,000 supporters, the congestion, traffic spill, double parking and increased automotive exhaust emissions will cause considerable harm and safety issues to local residents.

The plan to install a crossing over Frieze Way clearly recognises that this will be the case. Supporters travelling by train or bus, would have no other reason to cross Frieze Way into Kidlington.

The Fan Travel section of the Sustainability Statement bases all of its 'what if' beliefs on two surveys of football supporters. It shows over 83.1% of supporters currently travel by private transport (cars and vans).

The 'what if' ambition suggests a 33% reduction in CO2e emissions if car use dropped to 32%. **What and where is the evidence for this?**

Away supporters will all have at least one change to make, in order to take trains to the site. **If supporters claim they would not drive to site, why is this not evident currently in the 89% figure, where only 16.9% use sustainable forms of travel?**

And **why on match days are all roads leading to and from the Kassam loaded with parked cars?**

Air Quality

Kidlington roads are already congested, **where is the Air Quality Management Plan that supports the addition of up to 16,000 additional cars** on match days, given that there is no evidence that supporters (that don't use public transport to attend Kassam), will suddenly change because of this diversion to Kidlington?

There is no evidence that supporters will use the train. **Where is there any UK case study evidence for this?**

Sustainable Development Goals (SDGs)

Section 2.1 of the Sustainability Statement sets out eight SDGs.

- **How does a site with minimal on-site renewable energy generation meet SDG7?**
- **How does building a new concrete and steel stadium with embedded carbon, when a perfectly good site exists at Kassam, meet SDG 12?**
- **How is urgent climate action (SDG 13) being delivered here with an encroachment into green belt, removal of species, and a massive increase in unsustainable travel to the area?**
- **How is decimating the biodiverse flora and fauna of this site to meet any of the requirements of SDG 15?**

How can the Council “Do their part to achieve a net zero carbon district by 2030 and to lead through example” whilst acting in this way? Given not least that (according to 3.1) buildings account for 37% of total GHG emissions.

Yours faithfully



Resident and local Company Director