

Comment for planning application 24/00539/F

Application Number	24/00539/F
Location	Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station Oxford Road Kidlington
Proposal	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	Laura Bell
Organisation Name	
Address	
Type of Comment	Objection
Type	neighbour
Comments	<p>My reasons for objecting to the proposed development are as follows:</p> <p>Design, appearance and materials - Why is a large ground being built using new materials with further environmental impact when a perfectly good site already exists? This is contrary to all green proposal by the council.</p> <p>Parking provision The parking spaces and coach bays is insufficient given current known supporter travel patterns. Inadequate onsite parking will lead to the loss of community parking facilities at the Park & Ride with knock-on impacting businesses in Oxford (who are already stretched in terms of trade survival due to loss of trade as commuters switch to other more accessible shopping destinations) and other commuters who wish to travel into Oxford for cultural or work reasons. It is recommended that Cycle parking should be provided at 1 space per 50 seats. That is 320 spaces rather than the 150 proposed. OUFC is planning to use the Oxford Parkway cycle racks which is against local transport policy. Also impact commuters who are nothing to do with football. There is little evidence to suggest that incentives for fans not to park at Oxford Parkway will be effective. This is not the pattern in other areas where football arenas exist. How will the club influence over the travel patterns of away supporters. There is little evidence that this is possible in the current football stadium where the traffic congestion around match day is horrendous, and supporters still come in cars. Match Day Controlled Parking Zones (CPZs) are proposed. This indicates that the applicant knows that a significant number of fans will continue to travel by car and will cause significant issues for local residential areas. How can a CPZ only operate during matches? This is not how CPZs work. What about CPZs for other large events that are inevitable? If the Park & Rides are full of fans' cars, where will users who wish to use the P&Rs to access Oxford and the hospitals park? This has limited effect as a deterrent because the cost of a parking fine shared between 4 or 5 people is cheap parking. Discouraging isn't the same as preventing. It is unlikely to be successful as funds are likely to continue to park and pay fines if they cannot find suitable parking in the ground or other places. Detailed proposals on CPZs should be consulted on locally, not installed unilaterally. This does not dovetail with the strategy around the PR sites which, at least on the largest (PR6a), is to prevent commuter parking. How will reduced capacity at the P&Rs for current users due to fans taking over the facility impact the already struggling Oxford City traders? If the P&Rs (especially Oxford Parkway) are already full when fans start to arrive, what plans are in place to manage this? Have the calculations of the P&Rs capacities taken into account the planned traffic filters/bus gates and workplace parking levy? How would parking in other areas such as Stratfield Brake, Exeter Hall and Cutteslowe Park's two car parks be managed to ensure continued use of these areas is possible for other</p>

users?

Highway safety

Traffic congestion and road closures are inevitable on match days (and with any events held at this site) and should be major concerns for the councils.

The correct VISSIM traffic modelling is being carried out at the moment and is not yet available. OUFC used the wrong traffic modelling tool. This means that can't comment on the traffic modelling at the moment but will do so when the data is available.

Road closures (referred to as 'diversions') are planned despite Oxfordshire County Council's statement that the Oxford Road cannot be closed. Surely therefore the County Council must object to the planning application.

Road closures for "at least 30 minutes" before and after matches are planned on matchdays which include Saturdays. 30 mins is a minimum. Much longer delays are probable in practice.

A lot of buses/shuttle services are planned, including from the various P&R sites where fans plan to park. There doesn't seem to be any modelling of the impact of these, to include the unload times. Where will they wait during the match?

Extract "Key bus services and coaches will be marshalled through Oxford Road during periods of lighter pedestrian flows". 30 minutes is an unrealistic short period of time to move 16,000 people so this means bus delays on matchdays which include Saturdays. I draw your attention to historical precedent in Headington when the Manor was there and traffic congestion around matches was terrible and lasted several hours after matches.

The proposed diversion route (via Loop Farm Roundabout, Peartree Roundabout, Wolvercote Roundabout and Cutteslowe Roundabout) is already heavily congested and there will be even more traffic when the diversion is in place and people are trying to access the stadium. This will also directly impinge on non-supporters unnecessarily.

The available Park & Ride parking in the area is going to encourage fans to travel by car thus adding to congestion in and around the whole area.

The proposal states that 'many of our fans live within 20 minutes' walk, cycle, or on public transport of the proposed location' is simply incorrect: the main fan base is in East Oxford and public transport, cycling or walking would be a challenge.

New pedestrian crossings on the Oxford Road and Frieze Way will cause even more congestion on the Kidlington Roundabout and Peartree Roundabout, particularly if events/matches at the proposed site coincide with heavily attended events at Blenheim Palace.

A footbridge is needed to avoid road closures and should form an integral part of this planning application, not a separate one, but the proposal is not included as mandatory.

Coaches/shuttle buses from the park & Rides will unload at Oxford Parkway leading to further congestion.

It has been suggested that coaches may unload on Frieze Way which would take the diversion route down to one lane.

The bus lane on the east side of the Oxford Road appears to be removed in the plans. This will cause significant daily delays for buses travelling to Oxford in the rush hour and conflicts with local transport policy.

The Fan Travel section of the Sustainability Statement is based on surveys of football supporters, many of whom have a vested interest in the stadium moving. This is therefore not a reliable source of data.

83.1% of supporters currently travel by private car/van. The club "has an aim that 90% of fans will travel to the Stadium by sustainable modes" but no realistic means of achieving this. It is therefore probable that most fans, attracted by parking at Park & Rides, are likely to travel by car.

There is no evidence that many supporters will travel by train, most of the League One fans would find this very challenging and expensive.

What about the safety of non-football cyclists and pedestrians who want to use the pedestrian paths and cycleways on matchdays and find themselves caught up in large numbers of fans?

What about traffic management for other large events that are likely to take place?

The additional Toucan crossings on Frieze Way and the Oxford Road will cause further local congestion on matchdays, including on the diversion route and the Kidlington Roundabout.

Thames Valley Police concerns that fans won't use designated crossing routes have not been addressed.

Traffic holdups have the potential to affect the strategic road network (e.g. A34 & A40) Environmental pollution e.g. noise.

Allocated development sites identified in the Local Development Plan and or Neighbourhood Development Plans

Government policy and guidance

The National Planning Policy Framework states that inappropriate development on the Green Belt is not allowed unless there are 'very special circumstances' (VSC)

How is this a very special circumstance when we already have an existing stadium? OUFC acknowledges that the stadium is inappropriate development and that it would cause harm to the Green Belt but tries to justify it with 'very special circumstances' as follows:

The club has to find a new home by 2026.

The club made itself homeless and hasn't tried to negotiate to stay at the Kassam Stadium so it can't claim this as a VSC.

The District Council that it needs to challenge OUFC's claims.

This must include contact with Firoka, the stadium company, to confirm their position.

The Alternative Sites Report was pre-determined and is therefore unreliable and invalid because it was prepared after the lease had been agreed by the County Council cabinet to provide "justification for the application site, which is the Club's identified location for the stadium and ancillary facilities". (Alternative Sites Assessment para 1.2).

Also, the Alternative Sites Report says that one of the reasons the Kassam Site was not considered further was because "Landowner confirmed not willing to allow continued use or sell." The appendices show letters relating to other sites where there is a significant reason not to proceed with further consideration, but no evidence is shown for the Kassam Site. Furthermore, this statement conflicts with information in the public domain where the owner has stated it is possible for OUFC to stay at the Kassam Stadium.

There is no guarantee that the club will own its own stadium, in fact it is likely that it will not. Nor is it likely to own the conference facilities, or hotel, or the commercial retail sites that it thinks will generate revenue, so the proposed financial benefit is unlikely. In the future the club could be sold, and the situation could change overnight. What is to prevent this happening?

Any social and community benefits could and should be delivered from the current stadium not moved and developed elsewhere at great unnecessary cost and environmental impact.

Much of the proposed economic benefits could be delivered at the Kassam Stadium where it would arguably be of more benefit. The economic disadvantages to Oxford's city centre are overlooked. Full Park & Rides because the fans got there first and additional traffic will not help struggling retail outlets in the city. The council needs to act to protect the centre of Oxford, not destroy it.

The most environmentally friendly solution is to stay at the Kassam Stadium, particularly with the Cowley Branch Line in the pipeline.

The Club's aim of achieving at least a BREEAM rating of 'Very Good' is a low bar. 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.

The Club has an aim that "90% of fans will travel to the Stadium by sustainable modes" however there is no effective strategy in place to achieve this. Many / most fans will be attracted to the parking at the Park & Ride sites. The potential for OUFC to impact how away fans travel is limited. There is no evidence that they have any current effect at Kassam.

It is not preventing that the development has a strategy to deliver a 10% biodiversity net gain. How exactly will they do this? The detail is lacking.

The amount of open Green Belt and green space proposed will be minimal (about the size of the Kidlington Roundabout) and the heavy footfall will mean it won't stay green for long.

Also, on match days the plaza and garden will be a fan-zone, so we presume only really accessible to the general public on other days.

No public rights of way are being created over the site. (Para a 1.2).

Nature conservation

There is reason to believe that the bat and reptile surveys which took place from August 2022 to October 2022 were not conducted properly. The resulting data is therefore unreliable and must be repeated.

The number of breeding bird surveys is insufficient and the timing, only in June, missed the important March - May period. Further survey work is therefore required for an accurate assessment of breeding birds.

Plans for a proposed wildlife-rich green area at the northern tip of the site are totally unrealistic. This area and the northern plaza will be a fan-zone on matchdays. With 16,000 or more people on site, and the location of the green area next to public areas designed for socialising etc, the probability of this area remaining green and enabling wildlife to thrive is zero.

BBOWT previously commented that it would be necessary to have segregated areas with no public access. Cherwell DC's Ecology Officer also stated: "The very high level of public use of the site which will occur at certain times will necessitate some areas to be retained and managed solely for biodiversity to ensure habitats can function". The planning application seems to entirely ignore these fundamental recommendations which were made at an early stage by important stakeholders.

The ecology report ruled out the presence of Great Crested Newts too early. Further

survey work must be undertaken for this protected species which may be present on the site.

The development will not achieve the 10% Biodiversity Net Gain required by the emerging policy, Core Policy 14: Natural Capital and Ecosystem Services (CP14) which is included in the draft Cherwell Local Plan Review 2040.

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).

Importantly the proposed mitigation strategy is unrealistic because it fails to consider the timings of losses and gains, or the cumulative effect with other developments, 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.

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' i.e. of the 'highest nature value', existing wildlife areas.

The woodland is notable for the amount of standing dying trees, deadwood, dead stumps and rotting coppice stools which create an extensive and valuable habitat for fungi and saproxylic (deadwood-breeding) insects.

The woodland's valuable habitat is not sufficiently recognised by the Aboricultural Report. It is important that no deadwood is removed.

Bats, including rare species such as Barbastelle, use the site, particularly the southern area by the woodland. This woodland contains many bat roosting opportunities. These are a protected species.

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 spiders & harvestmen. Dr Webb also states this is just a small range and nothing like the full species diversity of invertebrates that will be present.

Dr Webb also noted that common plants can support rare insects e.g. the Common Fleabane on site yielded several individuals of the small and rare picture wing fly (Tephritid) *Myopites inulaedyssentericae*. In this context Ecology Solutions' statement that an assemblage of common invertebrate species would be present within the site is just one example of the biodiversity of the site being understated.

The non-intensive rotational willow coppice management of the site centre has helped to 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.

Both the range and abundance of invertebrates noted by Dr Webb are relevant for other species further up the food web, including birds and bats which, given the current absence of street lighting along the A4620 Frieze Way, are also likely to be commuting from the bigger Stratfield Brake western woodland area to forage on the site. The removal of this food source would directly impact bats and birds who forage on the site but next and roost elsewhere.

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.

Branches from the woodland may overhang the site over the southern attenuation pond area. This would not be ideal because the leaves and branches will require constant removal. Otherwise they are likely to block the hydrobrake structures in the outflow pipes. There is a danger that someone will decide to cut the trees back for this reason and this would be very damaging to the woodland.

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.

The ecologist's proposal that the notable species of flora such as Narrow-leaved Bird's-foot Trefoil and Corn Mint will be retained "wherever possible on Site and safeguarded during the construction phase". Inclusion of the words "wherever possible" make this plan meaningless because the amount of development planned for this small space makes the probability of this happening zero.

Where plantation of notable species is not feasible, such as with the orchids, the ecologist recommends a transplantation method where the plants will be moved to where these species can be retained on site post-development. We are told that in this

circumstance, for example, Narrow-leaved Bird's-foot Trefoil will therefore become part of a more appropriate meadow management scheme potentially resulting in an enhancement over the existing situation. Not only I this unlikely to succeed if attempted, but it is also unlikely to occur if not mandatory.

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 Section 41 NERC 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.

While the aboricultural report may consider that these TPO'd oaks are not in their prime, that is insufficient justification for their removal and downgrading on this basis should not be entertained. As they age, the trees will provide even more value from a biodiversity perspective. Rot holes and deadwood are normal in trees and home to many animal and fungal species. It is normal for oaks to go stag headed (i.e. with dead branches) in the crown and reduce their canopy. They can live on for 100s of years. Reducing the canopy is a strategy to reduce transpirational losses, it does not mean they are in poor condition and about to die.

Drainage and flood risk

Why attempt to build on a site that 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.

What will the cumulative effect of the developments in the area have on flooding? This will become more important as climate change progresses. 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.

In short this proposal is likely opt have major adverse environmental effects on this area, is not a specail circumstance and is not needed in this area. I object strongly to the council proposing it for a minority of Oxfordshire citizens, when the Kassam exists already. History reminds us that Kassam was built to move this pastime away from the city as it was a disaster in Headington on match days.

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Attachments