

# Comment for planning application 24/00539/F

<b>Application Number</b>	<input type="text" value="24/00539/F"/>
<b>Location</b>	<input type="text" value="Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station Oxford Road Kidlington"/>
<b>Proposal</b>	<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"/>
<b>Case Officer</b>	<input type="text" value="Laura Bell"/>
<b>Organisation Name</b>	<input type="text" value=""/>
<b>Address</b>	<input type="text" value=""/>
<b>Type of Comment</b>	<input type="text" value="Objection"/>
<b>Type</b>	<input type="text" value="neighbour"/>
<b>Comments</b>	<p>1) I object to the planning application for a football stadium on the 'triangle site' to the south of the Kidlington Roundabout. Below are my comments and concerns. Where I have made comments with respect to the proposed stadium this should not in anyway be construed as supporting the application. Whilst I have only been able to review a limited amount of information the points raised by me and others would suggest the application falls short of what it should in terms of base information, assessing impacts and providing mitigation.</p> <p>2) OUFC as a private commercial enterprise will want and need to maximise any revenue streams by maximising the number of football and non-football events at the stadium. It is presumed that at OUFC hope to move to the higher divisions which will further increase pressures to maximise incomes by holding more and larger events. This means that the adverse impacts on local residents and the environment will likely be greater than OUFC are currently suggesting.</p> <p>3) In order for OUFC to demonstrate that they will honour their promises regarding mitigating their impacts and providing the required enhancements they should undertake as much of the mitigation measures as possible prior to occupation of any part of the development proposals. This will ensure OUFC do not try to get out of these obligations at a later date if it later transpires they do not have sufficient funds to construct and operate the stadium and provide all the required mitigation measures. The planning authority should not be provided with a fait accompli of under provision by OUFC due to insufficient funding.</p> <p>Inadequate preparation which could lead to false conclusions</p> <p>1) It is understood that in OUFC's haste to submit an application they have not undertaken the full fact gathering required to fully assess the impacts of the proposed development on important criteria such as ecology, biodiversity, transport, drainage, highway safety, etc.</p> <p>2) Not undertaking the appropriate studies whether it be due to lacking in detail, insufficient consultation, insufficient traffic modelling, inappropriate timing (i.e. relying on bird studies outside the main period of nesting season) etc; will result in inadequate and incorrect base data which will lead to inadequate and potentially misleading assessments of the impacts of the proposals.</p> <p>Loss of Green Belt</p> <p>1) I object to the loss of green belt between Kidlington and North Oxford. Instead of Oxfordshire County Council (OCC) allowing OUFC to develop the site for the stadium they should make the land available for public amenity. The extensive proposed residential development in the general locality along with the Botley West Solar Farm could already be taking away areas of land used for ecology, nature and recreational use. The loss of nature and recreational space resulting from these wider developments should not be added to by using the triangle site for a football stadium. Hence this site should not be consented.</p>

## Transport and Highway Matters

1) Should the development proceed I fully support Oxfordshire County Council (OCC) requirement that A4165 Oxford Road should NOT be closed on match and other event days. To close the road will be require a significant diversion for non-motorised users (NMU's) that is highly impractical and disruptive to existing residents that use Oxford Rd between Kidlington and North Oxford.

2) Whilst it may be possible, in principle, to keep a closed Oxford Road open to local non-motorised users and buses the interaction with fans arriving at the football grounds either by foot or other vehicles would give serious concerns about public safety.

3) To comply with OCC requirement for Oxford Road not to be closed would require some form of footbridge or underpass. It is understood that OUFC intend to submit a separate application for a footbridge. This is totally unacceptable as its provision and its use on match days is fundamental to allowing local residents to use Oxford Road to go about there normal day to day activities without having to interact with supporters crossing from the Parkway to the stadium. In order to provide a footbridge accessible for all users and able to cope safely with large movements of people and if required segregation of home and away fans requires significant land take. The bridge needs to be in the main application to ensure it is a condition of the stadium provision. OUFC need to confirm they have the land and funds to deliver the bridge. By not including the bridge in this application it is not practical to demonstrate clearly whether or not its provision will impact on the proposals as presented and that it will not diminish any mitigation measures.

4) The development proposals will have adverse taffic impacts not just during and after each match but also at all other times (i.e. taking out bus lane on southbound approach to Parkway junction).

5) Oxford Road is used by a significant number of cyclists, pedestrians and other non-car modes travelling between Kidlington and North Oxford. It is not acceptable to either expect these users to interact with hundreds of fans crossing Oxford Road or to prevent these movements by closing Oxford Road and diverting them via Frieze Way.

6) The full impact of a closure of Oxford Road needs to be fully assessed and detailed traffic modelling carried out to assess the impacts on the wider road network. The means of implementing the closures, diversions and warning of the road closures need to be agreed with the relevant highway authorities and all subject to detailed road safety audits. The points of closure need to allow local access and provide safe routes for errant vehicles to turnaround and use designated diversion routes.

7) OUFC need to demonstrate that Oxford Parkway can accommodate the thousands of fans arriving en-masse in an orderly and safe manner. A major concern would be the interaction between home and away fans. They also need to demonstrate how local residents and visitors to the area are able to safely undertake their ongoing journeys by train, bus or car in a safe manner. If as is likely this demonstrates there are concerns then OUFC need to agree with the Parkway station, train and bus operators what measures are required to conduct movements in a safe manner for ALL users and provide the necessary funding for the measures to be implemented before any matches are allowed to take place. This requirement should be tied into any planning consent as pre-occupation condition.

8) There are a considerable number of southbound buses that run into Oxford using the existing bus lane. Congestion during peak traffic periods often results in traffic on Oxford Road queuing back to the north of the A34 road bridge and sometimes back to Kidlington Roundabout. The continuous existing bus lane means that disruption to buses and taxis is kept to a minimum. The OUFC proposal to remove a section of the bus lane to the north of the Parkway junction require buses to join the general traffic lane and be delayed when congestion occurs; this will impact on the journey times for the buses and cause delays. With merging traffic there is also a higher risk of accidents. The loss of a section of bus lane should not be permitted.

9) A new traffic signal controlled pedestrian crossing is proposed just to the south of the new crossing currently being constructed by OCC at the roundabout. This new crossing will cause further delays to traffic along Oxford Road. A vehicle swept path drawing produced for OUFC shows a large HGV exiting the site at this location. It should be noted that whilst there is a lorry shown exiting it appears to be crossing the proposed cycle/footway and is very close to the proposed signal crossing. These factors could be considered to be a road safety issue and not acceptable.

10) At the entrance to the site off Frieze Way the above mentioned HGV is shown travelling over a traffic island which is not acceptable.

11) The above issues with the HGV movements raise concerns that the proposed road layouts are not fully considered and as such will be subject to further design with impacts on the proposals.

12) Adverse impacts on local transport for local residents and tourists could have a detrimental economic impact on businesses by discouraging them from visiting Oxford and it nearest towns and villages.

## Parking

1) In order to placate concerns about the traffic impacts of the stadium, OUFC have stated they will aim for 90% of fans to arrive by non-car modes. Despite this aspiration to have fans arrive by non-car modes, the reality for a significant period, if not for all time, will be for fans to travel to matches in cars. As a result of the lack of on-site car parking due to the limitations of the site boundaries this will result in cars parking in the local car parks intended for other uses i.e. park and ride site, station car park and Stratfield Brake Rugby club. Fans using these parking areas could impact on the intended users of the facilities with adverse consequences. When these parking areas are full fans cars will park on the sides of roads, in nearby residential roads etc. Indiscriminate parking on local roads unless enforced, which is unlikely, will have safety implications and reduce the capacity of the roads resulting in greater congestion.

2) If the stadium were to get consent it should be on condition that OUFC provide their own Park and Ride site facilities alongside suitable main roads and the fans are then bussed to and from the stadium. This will mitigate impacts on the local users on Oxford Road and allow for better crowd controls. Before a stadium consent is granted a dedicated Park and Ride should be located and all the necessary studies and consultations undertaken to enable it to be included in the stadium application.

3) It is suggested that fans be encouraged to use one of the many existing Park and Ride sites on the outskirts of Oxford. Detailed studies should be undertaken to determine the current and future usage to determine what if any spare capacity exists. This study should also consider what the impacts would be if there is no parking available and cars try to park on roads in the locality. Traffic modelling of the park and ride site junctions should be undertaken to ensure they are able to safely manage the volumes of traffic without causing disruption to the existing roads. If disruption is caused then fans should not be encouraged to use the site.

4) To manage parking on local streets within 2km of the stadium OUFC have proposed the introduction of a match-only Controlled Parking Zones (CPZ) which operate during matches. This is an unrealistic proposal due to:

highly unlikely to be enforced.

matches will not be on the same days and times each week so the Match-only CPZ would require some form of variable restriction, which is not practical.

confusing for both local residents, their visitors and for fans.

5) If the match-only CPZ was enforced then it could just result in cars parking in streets further away outside the CPZ thereby displacing the problem to residents located further from the stadium. Due to the increased distance it would then be likely fans would use regular bus services potentially making them difficult to use for existing local users.

6) The parking strategy that is relying on existing facilities and roads that are not controlled by OUFC further reinforces the need for OUFC to either stay at the Kassam Stadium or relocate to a more suitable brownfield site which has the required area on site for car parking and with good transport connections and which has minimal impact on ecology and landscape.

## Ecology and Environmental

1) From the report undertaken by Dr Judith Webb it is apparent that the proposed development site and the adjoining areas have significantly higher ecological value than OUFC have declared in their application. The proposals would not only have a significantly detrimental impact on the development site itself but also impact on the nearby ecological areas. Given the extensive residential development proposed in the local area, existing sites with good biodiversity should be retained and not obliterated as would occur if the OUFC proposals were to go ahead.

2) OUFC need to deliver a 10% biodiversity net gain. This does not seem possible given that OUFC propose to develop a greenfield site retaining minimal trees and planting and providing unnatural hard and soft landscaped areas which will be used by thousands of fans.

3) The provision of lighting for the stadium and open space will have a major detrimental impact on the little retained ecology within the development site and on the adjoining areas, particularly the Woodland Trust area at Stratfield Brake and the Stratfield Brake Nature Reserve.

4) It is difficult to understand how OUFC can claim with the minimal retained planting and with very limited new landscaping they will provide sufficient biodiversity and habitat to mitigate their significant adverse impacts.

## Surface water drainage

1) From the Flood Risk and Drainage Strategy report it is evident that the OUFC drainage proposals are not sufficiently developed to prove they have the means to dispose of foul and surface water from their proposed site. Without a detailed scheme which demonstrates clearly how foul and surface water will be disposed off the development should not be consented.

2) The discharge of surface water is dependent on a large diameter culvert under Frieze Way which is significantly blocked. Before a consent is granted OUFC need to demonstrate that there is an unobstructed route to a suitable watercourse able not only to accommodate the correct greenfield run-off rate from the development but also able to manage the increased volume of water that enters the watercourse in a much shorter period than is likely to be the case with the existing greenfield site. OUFC need to demonstrate that there surface water discharge will not increase downstream flooding to third parties. This will require more detailed studies and consultations to prove there is an outfall to the receiving watercourse.

3) OUFC surface water strategy assumes that the large diameter culvert will be cleared out by the landowner and future maintenance will be undertaken by them. As OUFC have no direct control of the culvert they cannot rely on either the culvert being cleared out and in particular that future maintenance will be carried out.

4) Correspondence with OCC Highways indicates that the existing large diameter culvert under Frieze Way may be a highway asset. By normal convention a highway asset will not be able to receive surface water discharges from a private development site. This is alluded to by OCC in that they have suggested a new culvert would be required under Frieze Way into a suitable downstream watercourse. OUFC have therefore not demonstrated that there surface water drainage proposals have a viable outfall. Before any planning consent is provided OUFC need to demonstrate there is a technical solution to convey surface water from there site to a suitable watercourse within land that they have control over. If the delivery of their outfall requires consent from another land owner then OUFC must provide details of the land owners consent. Without the said consent the application should be rejected.

5) Whilst OUFC have considered the circumstances when the hydro-brake is blocked, this would only be a temporary problem until the hydro-brake is cleared or replaced. Being unable to discharge water from the site due to the culvert being blocked could be a much longer term problem. Water overflowing onto the car park and roads for anything other than a very short period would not be acceptable particular if the parking areas are used for disabled parking.

6) The Mott McDonald report acknowledges there is some uncertainty about the viability of a culvert under Frieze Way being suitable for the site discharge. They have discussed an alternative strategy which seems to rely on using Highways England highway drainage. This strategy would not work as Highways England would not agree to receive a discharge of surface water from a private drainage system.

7) Given that the underlying soils are unlikely to accommodate infiltration systems OUFC have not demonstrated that they can manage there surface water and until they have a proven they can discharge to a suitable receiving body without flooding third party land consent should not be provided.

8) From the above I would suggest that OUFC do not have a workable and proven means of discharge for surface water from their proposed development and they need to undertake the necessary detailed studies and consultation required.

#### Foul Water drainage

1) The proposed foul water drainage layout shows a final manhole to the south of the roundabout with a depth to invert level of approximately 7.5m. This is a very significant depth for any drainage pipe and the installation of a pipe that deep will require a significant area of land to undertake with large construction plant. This would impact on the existing trees and shrubs that form the northern boundary of the development. These trees and planting would provide screening and should be retained.

2) The invert level of the proposed pipe is significantly lower than the nearest Thames Water foul water manhole and OUFC have not addressed how they expect to discharge into the existing manhole. Some form of foul pumping station would be required which would need to have not only an area set aside for it but to also be provided with tanker access.

3) Before any consent is provided OUFC should seek confirmation that the development foul water discharge can be accommodated in the existing foul drainage system (either as existing or by OUFC funding network improvements). If there is insufficient capacity then OUFC may need to deal with there foul discharge by the provision of an on-site treatment works. If this was required where would OUFC locate it and provide tanker access given the proposed high density of development?

4) Whether or not a foul pumping station or treatment works is required with suitable tanker access this needs to be resolved prior to a consent being granted to allow for the impacts on the proposals to be fully assessed. The retained existing and proposed landscaping is already insufficient and any further loss would be unacceptable.

**Received Date**

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**Attachments**