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The Wolvercote Neighbourhood Forum (WNF) seeks to represent the views, in relation to planning matters, of residents in the Wolvercote Neighbourhood Plan area, located just 1 km south of The Triangle and stretching from the river Thames in the west to Cutteslowe Park in the east. Our Wolvercote Neighbourhood Plan (WNP) was approved overwhelmingly by residents in a referendum in May 2021 and was subsequently 'made' by Oxford City Council.

### **WNF comments on planning application 24/00539/F to Cherwell District Council**

This application is from Oxford United Football Club for the erection of a 16,000 seater stadium, containing a range of other facilities, on land east of Stratfield Brake and west of Oxford Parkway railway station, referred to locally as The Triangle. The WNF Steering Committee has considered the application on behalf of WNF and responds as follows.

There is much support for OUFC in the community we represent, and a widespread wish for the club to find a good solution to their need for a stadium, that meets their needs after 2026. However, the Triangle is a totally inappropriate location for the new stadium, being so tightly constrained and located where it is. It is significantly smaller in area than OUFC originally declared was the minimum they could tolerate, so small that it can provide no spectator car parking, and it is wedged between two busy main roads (Oxford Road and Freize Way), both vital features of the local transport infrastructure. Moreover, its location is such as to enhance local problems of inadequate sewage treatment capacity and of flood risk. Hence the proposed development will have potentially severe adverse impacts on the locality, and these will impinge on Wolvercote Neighbourhood Forum area residents, whom we represent. From the Alternative Sites Assessment, it seems these problems were completely overlooked in the selection of the Triangle as the site for the new stadium.

We **object** to planning permission being granted, on the following grounds.

#### **1. Match day consequences for local road traffic**

1.1 The applicant says matches will be held in the stadium on some weekday evenings and on Saturdays, posing the question of how so many spectators will safely access and leave the stadium, on a regular basis. The solution proposed is for there to be periods of 'Traffic Management' for one hour before the start of each match and one hour after each match. During both of these periods there will be **"at least" 30 minutes of closure of Oxford Road**, to allow the thousands of spectators to safely cross this road from Oxford Parkway to the stadium. The road closures will be accompanied by a significant diversion of north-bound traffic, for example, along Sunderland Avenue to Wolvercote roundabout, then along the A44 and then Freize Way to Kidlington, directed by means of Variable Message Signage. To

cause this level of disruption to one of the main public thoroughfares into and out of Oxford City would inflict an unreasonable inconvenience on local residents and on vehicles, including buses, from further afield.

1.2 The applicant admits that the diversion of traffic during match-day closures of Oxford Road will cause 'significant' delay to drivers on Banbury Rd north and south and Elsfield Way. However, on A40 North Way, Woodstock Rd, A40 Northern Bypass and Godstow Rd the applicant claims that delay to drivers will be 'not significant'. But this claim is grossly misleading because it is based on implausible predictions of the behaviour of spectators arriving by car. The applicant says that the Oxford Parkway P&R *"..will not be made available to supporters."* Also, *"Supporters will not be encouraged to park at Oxford Parkway"*. So the applicant's working assumption is that all spectators arriving by car will park at alternative P&R sites and take shuttle buses or regular buses to the stadium (e.g. the 700 bus from Thornhill P&R, which runs every 30 mins and takes 45 mins to reach Oxford Parkway).

1.3 This assumption that spectators will be so easily deterred from parking in the public car park, available to all, at the Oxford Parkway P&R is naïve in the extreme. Since it is located so close to the stadium, it will very obviously be the target of **all** spectators arriving in cars (of which there are predicted to be 3126 on a Saturday match-day). Considering that Oxford Parkway P&R has a total capacity of only 758, the potential for chaos is clear. The car park will fill up rapidly; all the nearby roads will be congested with so many spectators arriving by car and then hunting for somewhere to park; the Oxford city Park&Ride facility at Oxford Parkway will be rendered unusable by all other users such as shoppers. Such a chaotic situation would be wholly unacceptable, but the applicant provides no plausible assurance that it will be avoided.

## **2. Match day nuisance caused by spectator parking**

It is clear from above that a prominent feature of match days will be hundreds of spectators arriving at the stadium by car, hoping to park at Parkway P&R, failing to find a parking space, and hunting for alternatives, preferably free of charge. There will be several attractive options nearby: Kidlington Sainsbury's car park (up to 3 hours free of charge); the small free car park (12 spaces) at Stratfield Brake, just across Freize Way from the stadium and intended for walkers; the car park at Stratfield Brake intended for use by sports clubs. So there will be many other casualties of the OUFC plans: shopping at Kidlington Sainsbury's; Saturday afternoon walks by locals in the woodland at Stratfield Brake; convenient parking for sports clubs at Stratfield Brake. In addition, of course, all homes within a 2km radius of the stadium will have Controlled Parking Zones imposed on them, or existing CPZs extended, to include weekday evenings and Saturday afternoons, to protect them from the overflow parking. These many examples of nuisance to the community are inevitable if the stadium goes ahead, and in our view should not be tolerated.

## **3. The stadium will increase the burden on inadequate local sewage treatment plants and increase volume and frequency of sewage spills into the Thames**

3.1 *Demands created by the proposed development.* Sewage treatment plant planning is based on 150 litres of overall sewage demand per person per day. Even vacuum flush toilets require 2-4 litres/use. The likely production of sewerage demands at the proposed stadium

will range from 96,000 to 400,000 litres on game days, at capacity of 16K fans, not including players, support staff, or users of the hotel. The annual increase in demand will run to 4.8 million litres using a conservative figure of 50 game days at 96K litres/day. WNF objects to this development because the modelling of demands in the application is not realistic and fails to recognise the inadequacy of capacity. Moreover, there is **no realistic prospect of additional capacity for this location in the system for at least another decade.**

3.2 *Infrastructure provision and planning* The Oxford 2040 Local Plan (at BGP 009.a, pp6-7) places reliance on intentions announced by Thames Water in 2018. As of 11 March 2024 Thames Water was not part of the national cleanup budget of £180 billion, and its £8 bn cleanup budget does not allocate precise, targeted, adequate funding for new sewage and surface water demands in Oxfordshire. No improvements are due before the mid-2030s.

3.3 *Impacts of existing sewerage management* Lower Wolvercote and the Wolvercote Mill Stream were directly affected by the 11,577 hours of sewage dumping into the River Evenlode that took place in 2023. The Mill Stream Designated Bathing Area in Lower Wolvercote has been rated as 'poor' for the third year running. Multiple instances of sewage photographed on Port Meadow and on its shores have been lodged with Thames Water. From January to March 2024 the Oxford Sewage Treatment Works released sewage for 1,304 hours, which is 70% of the total number of hours for 2023. Thames Water is at present subject to criminal investigations for its sewage dumping in the county, and the Wolvercote section of the Thames is especially vulnerable to this failure on their part.

#### **4. The stadium will increase local flood risk and hence threaten local climate change resilience**

Lower Wolvercote is at significant risk of increased incidences of flooding caused by what Thames Water calls "urban creep" in the catchment. The company identified areas to the north and west as particular areas of projected demand. This development was not projected in 2018. SUDS planning is inadequate; this development will add to Wolvercote's flood burden by increasing surface water runoff from roofs and tarmac which, ultimately, will be channelled into the Oxford Canal and then the Thames. Higher rainfall predicted to result from climate change in coming decades will exacerbate this problem.

From Wolvercote Neighbourhood Forum Steering Committee, 22 April 2024

