

REF: 23/02276/SCOP**Location: Stratfield Brake Motorcycle Track Oxford Road
Kidlington**

27 September 2023

EIA Scoping Opinion

Dear Laura,

Thank you for consulting me on the above application, and for engaging Thames Valley Police at this very early stage. I have reviewed the submitted documents and crime statistics for the local area, and have held internal consultation with colleagues across Thames Valley Police. This large development proposal will have a significant impact on Thames Valley Police and the surrounding local area, and as such it is of fundamental importance that the scoping exercise is completed in as much detail as possible, taking into consideration the below comments. I have concerns that the submitted report suggests omitting certain criteria, such as major incidents, whereas I would argue that they should be scoped in as very relevant to this development.

I provide the following comments to ensure forthcoming applications meet the requirements of;

- The National Planning Policy Framework 2021 paragraph 92(b); which states that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...
- The National Planning Policy Framework 2021, paragraph 130(f) which states that "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".

Highways and Road Safety

- Traffic management colleagues have significant concerns with the roads surrounding the proposed development, and how they will safely accommodate large amounts of foot traffic. The A4165 Oxford Road for example, is not of sufficient width to safely accommodate the potential amount of foot traffic that will be generated, combined with vehicles and cycles that already use this road.
- They are unable to see how the route will be able to function safely, without a very significant amount of alterations to improve the road network. There is currently no separation between pedestrians, cyclists and vehicles, in what will become a very crowded place at times.
- Considering the volumes of pedestrians the A4165 footpath may need to handle, they are very narrow leading to the danger of pedestrians entering the carriageway.
- There was a road death at the Parkway Park and ride only a few months ago, which is currently still under investigation. Any proposals need to ensure all traffic, including vehicles, cyclists and pedestrians can be safely accommodated.
- There are no existing pedestrian bridges over the roads surrounding the proposed stadium site. Pedestrians crossing the roads on match days, particularly during phase 3 (exit), must not obstruct the highway and cause delays to the surrounding road network. Failure to provide suitable crossing facilities will result in fans moving on-masse and littering the Oxford Road, they will just run across the road. It should be noted that pedestrian crossings across the A4260 dual carriageway are far from ideal.

- Any formal crossing facilities must be located at a desire line, which might be difficult for this development.
- Match day traffic must not create delays and obstructions to the highway network which could have a knock-on impact on the wider strategic road network – I.E. the A34. Traffic queuing to leave the A34 due to congestion on local roads surrounding is a worst case scenario that cannot be allowed to happen. Queues off the A34 MUST be avoided at all cost.
- Roads either side of the stadium are long and straight, with potential for significant vehicle speeds, creating counter terrorism risks (see below).
- BTP Colleagues raised concerns that Oxford Parkway station is limited in terms of capacity, and is due to open a link to Cambridge in the next few years. This additional route will add extra footfall and vehicle demand on the site which may not have been factored into considerations at this time.
- BTP Have concerns that the car parking at Parkway Station is not of sufficient capacity to support additional parking for a stadium, they also have concerns that the Parkway station itself is quite small in terms of capacity for passengers, it may become difficult to manage people through.
- If the speed limit for the roads surrounding the stadium are reduced, compliance becomes an issue – it cannot be relied upon that drivers will stick to the lower speed limit, and you will not be able to achieve compliance with a lower speed limit on the dual carriageway.
- Should it be considered for Stratfield Brake to be used for match day travel, it may be problematic and conflicting should there be rugby being played at the same time. Again I have concerns regarding how pedestrians will safely cross the dual carriage way to get to the stadium.
- Kidlington already has a fragile road network that is badly affected when there are issues on the surrounding road network, such as the A40 and A34. The applicant must consider what additional impact this development would have on existing road networks, and what measures would need to be in place to mitigate against additional disruption. We do have concerns that the existing infrastructure is not sufficient to support the addition of the stadium, and improvements will need to be made.
- I have significant concerns should the venue be used for other large events such as music concerts – If the pitch is converted for standing, attendance numbers may be very significantly higher than they would be for football – compounding and elevating the risk of all of the concerns listed in this report.

Counter Terrorism

The threat of terrorism or major disasters in a crowded place and publically accessible location such as this is a risk that must be considered at this stage.

- The impending protect duty must be considered at this stage – we don't know the full extent of what this legislation will require but there will be a lot more onus on the stadium owners and operators, and the local authority to manage and hold risk. What measures will be taken to protect the development and its users from terrorism, both on match days and during normal community use?
- The commercial elements of the development will also fall under counter terrorism considerations, with the hotel and other uses also being designated "Crowded Places" and publically accessible locations. As such detail must be provided as to what protective measures will be in place.
- Hostile Vehicle Mitigation is of fundamental importance for this development, – we will have large volumes of people walking alongside main arterial roads and the railway line, where the restricted width of the road and existing lack of separation create significant safety risks. Vehicle as a Weapon attacks are a risk that must be mitigated against. The fan route to and from wherever the applicant is proposing car parking and coach pick up/drop off and the train station must have sufficient vehicle mitigation measures in place to prevent any such attack. I have concerns that without all of this land being in the control of the applicant, whether this will be achievable which raises concerns.
- All counter terrorism measures should be designed in from the start – it is difficult and extremely expensive to add them later.
- There are a number of significant vulnerabilities at the existing Kassam stadium, and it is extremely important that these are not transferred across to the new stadium.
- There are many different vehicle-born threats and penetrative vehicle threats that will be relevant to this development – We must mitigate against these risks before the stadium is built, not try to mitigate against them after the build.

- **Counter terrorism Security Advisors request further consultation with the applicants ASAP, particularly regarding HVM measures. TVP have a significant wealth of experience and I would encourage the developers to approach us for completely free advice, prior to submission of any plans for planning permission.**
- Oxford Parkway train station is not currently a site of any risk and is not laid out and managed to deal with the additional risk that football footfall will bring. I ask that you consult with BTP regarding these concerns.

Football Policing and Operations

- In the event of emergency evacuation, there must be sufficient space around the stadium for safe unhindered egress without the risk of people spilling out of the site and impacting roads and footpaths surrounding the development.
- Football fans will move as they want to, and will not follow signposted routes. One route in and out of the site would not be ideal, and robust segregation plans for home and away fans should be in place to prevent crime and antisocial behaviour/disorder.
- There is a risk that during the exit phase from the stadium, the primary route from the stadium is going to be inundated with foot traffic, which unless sufficient consideration has been given could close the road for a period of time. Concerns that the volume of fans on egress creating obstructions on the highway could have a knock-on impact to business as usual for the park and ride and train station – this location may become very claustrophobic and have a negative impact on other users of the park and ride/train station. On a Saturday 5pm match day for example, the mix of different people and uses you will see going on all at once in this location will create issues and require additional police resourcing to manage.
- The site is enclosed with significant tree and hedge planting, which if retained may cause challenges for CCTV operations and lighting. In order to ensure public safety, lighting and planting must ensure maximum surveillance opportunities in external circulation areas to detect and deter crime and ASB.

Parking

- Parking is one of the most significant concerns regarding the location of this stadium. Fans of OUFC are very used to the large amount of free parking provided at the Kassam and on surrounding residential streets, and I have concerns that unless similar provision is provided at the new stadium site, it will be very difficult to change habits of fans, particularly in the first few years of occupation. If insufficient parking is provided, there is a significant risk that residential areas all around the stadium will be littered with fans vehicles on match days.
- The stadium is very close to residential developments, and is going to be surrounded by many more residential homes as strategic land sites become built over the next few years. It is unclear at this time whether CPZ's will be considered, or supported by the council and local residents. Parking is one of the most significant generators of contact with the police, and our chief constable receives more direct emails regarding parking than any other policing issue. Therefore, it is imperative that this risk is considered at this stage, and that the applicant clearly demonstrates how parking in surrounding areas such as Garden City will be prevented.
- I ask that all parking facilities for the stadium, new or existing, are designed or upgraded to meet Park Mark standards.

Neighbourhood policing

- The Park and ride/railway station are very often used by residents of Kidlington and surrounding. Plans will need to be in place to mitigate the impact of match/event days on local residents, which should be considered.
- There is a risk that there may be an increase in alcohol related crime and ASB in the local area – if fans are having to park in Kidlington and the surrounding area, they will head to the drinking establishments in this area before the game to drink, which may have an impact on local crime levels.
- Violence against Women and Girls is an important consideration, particularly for games after dark. How will travel from the stadium to car parking and park and ride facilities be made safe? What proposals are there for additional CCTV and lighting in the area?

Lighting

Lighting throughout the development must meet the general standards of BS5489-1:2020. Lighting plans should be provided which should set out how this standard will be achieved not only on adopted highways, but also external circulation areas and parking. Lighting must be designed holistically with planting and CCTV to maximise surveillance and visibility. Trees and hedge planting must not impinge on lighting and create areas of shadowing.

Bin and cycle storage

Bin and cycle stores must be designed to meet Secured by Design standards – Bin stores in particular are vulnerable to crime and arson attack and as such must be robustly secured.

Staff cycle storage should be fully secured and enclosed to prevent opportunities for theft.

The above comments are made on behalf of Thames Valley Police and relate to crime prevention design only. I hope that you find these comments of assistance. If you have any queries relating to crime prevention design, please do not hesitate to contact myself.

Kind regards

Kevin Cox.