

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 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. Asbury

Resident and local Company Director