

# Comment for planning application 24/00539/F

<b>Application Number</b>	24/00539/F
<b>Location</b>	Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station Oxford Road Kidlington
<b>Proposal</b>	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>	Laura Bell
<b>Organisation Name</b>	C H Asbury
<b>Address</b>	Cromwell House,Cromwell Way,Kidlington,OX5 2LL
<b>Type of Comment</b>	Objection
<b>Type</b>	neighbour
<b>Comments</b>	<p>Planning Application 24/00539/F</p> <p>29th March 2024</p> <p>To Whom it May Concern</p> <p>Planning Response</p> <p>I have read the planning application for the stadium at the triangle in Kidlington and have the following concerns:</p> <p>Traffic and transport</p> <p>The planning statement anticipates that 580 annual events at the stadium and proposes a stadium with 18,000 seats and lounge access for 1,000 guests. Parking at this site will be available for only 81 realistic spaces.</p> <p>The Kidlington roads that I live and walk around are already congested. Where is the Air Quality Management Plan that supports the addition of up to 16,000 additional cars on football match days?</p> <p>There is no evidence that supporters (that don't currently use public transport to attend Kassam), will suddenly change because of this proposed move to Kidlington?</p> <p>There is no evidence that supporters will use the train.</p> <p>Is there any UK case study evidence to demonstrate that football supporters will suddenly move their journey habits to rail?</p> <p>Of the 24 teams in League One, where Oxford United play, most would find it challenging to travel by train. There is no evidence that this form of transport (which is the sustainability claim of the application), would result in majority supporters taking rail transport to the ground.</p> <p>There is no plan for the additional congestion, traffic spill, double parking and increased automotive exhaust emissions that will ensue form this ill-considered application. This will cause considerable harm and safety issues to local children and residents.</p> <p>The plan to install a crossing over Frieze Way (which I already now being constructed as part of roundabout adjustments, and prior to this application being considered), effectively agrees that parking will spill over into Kidlington residential streets. Is this move to install a Crossing at Freize Way an acceptance that this application has already been agreed?</p> <p>Supporters that travel by train or bus (as the application proposes), would have no other reason to cross Frieze Way to and from Kidlington.</p>

The Fan Travel section of the Sustainability Statement bases all of its 'what if' beliefs on two surveys of football supporters. It shows over 83.1% of supporters currently travel by private transport (cars and vans).

The 'what if' ambition suggests a 33% reduction in CO2e emissions if car use dropped to 32%. What and where is the evidence for this?

Away supporters will all have at least one change to make, in order to take trains to the site. If supporters claim they would not drive to site, why is this not evident currently in the 89% figure, where only 16.9% use sustainable forms of travel?

And why on match days are all roads leading to and from the Kassam loaded with parked cars?

### Green Belt

There is a very high bar that needs to be reached to justify building on green belt land. These 'very special circumstances' to justify the proposed development in the Green Belt have not been demonstrated.

The three case studies used in the application to justify these 'very special circumstances' are far from relevant here.

Specifically:

1. Newcastle Falcons in 2002, did not already occupy a 23-year-old football stadium (with a 60-year life) that already had foundations and potential to expand it to 16,000 seats. Nor are OUFC members of a prestigious league such as the Premier league.
2. Brighton and Hove Albion: In 2001, this case was called in. It 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. Consequently, OUFC should be building relationships with Mr Kassam.
3. Southend United in 2008, was not to be built on green belt land. This is therefore irrelevant.

These cases are 20 years old. All Oxfordshire Councils have since recognised climate change as an existential 'emergency'.

There were no alternate sites in these three case study locations. There are 42 being considered in Oxfordshire, 8 of which not in the green belt. The Kidlington site is not in Oxford. These case studies are put forward to justify a case for building on green belt land. None of these three are at all relevant to this application and do not provide a precedent for building on green belt land.

OUFCs failure to consider the future of their club, and to negotiate and agree contracts with the Kassam owners for the longevity of the site (60 years) are unforgivably poor business decisions. Green belt cannot be rolled over as a result of such poor business decisions or weak business management. These are business decisions and are not the concern of the residents of Kidlington who would-be left to pick up the pieces of this.

How do OUFC propose to act if the same poor management leads to disagreement with their new owner. Will they be seeking to demolish this and build another stadium?

### Biodiversity Net Gain

The claims that this site isn't highly biodiverse are intrinsically false. The site is rich in biodiversity including but not confined to great crested newt, badgers, and bats.

These are all protected species. Since we understand that it is now universally accepted that the monitoring equipment installed at the site to detect these bats was removed very shortly after it was installed, there have effectively been no bat surveys conducted.

This is legal requirement in such an area. In terms of these species, absence of evidence is not evidence of absence.

What are the new and improved habitats? "The vision has been to incorporate flexible multi-functional spaces, monocultured (and aesthetically pleasant trees and shrubs) that can be enjoyed whether it be a match day or not".

This fails to understand anything about Biodiversity. Biodiversity net gain is not about giving over green and wild lands to public wanderings.

How exactly can the building of a concrete and asphalt mass on this site, add a 10% net

biodiversity gain?

That is built on the false assumption that the site is currently biodiversity neutral and contains no biodiversity. This is evidently and absolutely not the case.

#### Construction

The talk of a Route Map for Avoidable Waste in Construction would be far better delivered by not constructing. Instead, OUFC and its new owner should be coming to a sustainable business arrangement with Mr Kassam to build a fourth stand at the Kassam and upgrade facilities there.

This will avoid the need to demolish a perfectly good and adaptable stadium and avoid all of the embodied carbon being lost from this 23 year old site. An approach similar to share ownership of the Kassam site may be an option. Where is the evidence that such discussions been conducted 'to exhaustion' between the old and new owner and OUFC themselves?

#### Carbon Reduction Pledges

The summary claims a 51% CO2e reduction by moving to Stratfield Brake. The stadium is not being built at Stratfield Brake, so how is this relevant?

The 'what if' reductions discussed in this Sustainability Statement, are exactly that, what ifs and pipe dreams.

What if the stadium were to be built to Olympic standards or to BREEAM Outstanding and confirmed as this? Instead, we see vaguely aspirational goal to be diluted if they use too much capital funding and start to look like they might not be 'economically viable'.

A voluntary BREEAM 'Very Good' equates to 55% of what an outstanding build would look like. This application demonstrates absolutely no will to build a sustainable or world class stadium. Simply a cheap and quick build to satisfy the financial benefits of an overseas palm oil investor.

By simply asking the question 'what if?" OUFC are failing to make any pledges or demonstrate any evidence of agreed and firm CO2e reduction actions or means thereof. they have provided no evidence that any f these 'aspirations will be delivered.

Given that buildings account for 37% of total GHG emissions; How can Oxfordshire County Council who have supported this project from the start "Do their part to achieve a net zero carbon district by 2030 and to lead through example" whilst acting in this way?

Yours faithfully

C H Asbury

Resident

**Received Date**

29/03/2024 17:54:05

**Attachments**