## Comment for planning application 24/00539/F

Application Number	24/00539/F
Location	Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station Oxford Road Kidlington
Proposal	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
Case Officer	Laura Bell
Organisation Name Address	L Asbury
	Cromwell Ho., Cromwell Way. Kidlington. OX5 2LL.
Type of Comment	Objection
Туре	neighbour
Comments	Reference: Planning Application 24/00539/F
	31st March 2024
	Planning Objection
	Having read the planning application for the stadium at the triangle in Kidlington and have the following concerns:
	Local Planning Application
	This is a local planning application that will adversely affect the people of Kidlington in a number of ways.
	Because it is football related, it has evidently drawn in large amount of support from disparate regions, including as far afield as Aberdeen, and Cumbria, as well as Les Houches, in France and Victoria, in Australia!!
	These cannot be treated as support, given the effects felt by these respondents will be minimal if not non-existent.
	Being a football fan, does not justify support for the move from one stadium to another when the former is in good condition, has c 40 years of life left and has the potential for growth.
	Green Belt
	Building on Green belt land demands the achievement of a very high bar. The 'very special circumstances' cited to justify this proposed Green Belt development have not been demonstrated.
	In this application, the three case studies used to justify meeting the 'very special circumstances' have no relevance here. This is because:
	1. Newcastle Falcons in 2002, did not occupy a 23-year-old stadium (with a 60-year life) that already had foundations and potential to expand to 16,000 seats. OUFC are not members of a prestigious league such as the Premier League.
	2. Brighton and Hove Albion: If this is deemed to be similar, this case was called in during 2001. It took until 2005 for the secretary of state to judge in their favour, only for this to be quashed in 2006. it was not finally approved until 2007. This is far from a clear-cut precedent. In this case, OUFC would be without a stadium until 2031. As such, OUFC should be building relationships with Mr Kassam.

3. Southend United in 2008, was to be built close to, not in green belt land and so is entirely irrelevant.

Two of these cases are more than 20 years old. 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 these are not in the green belt.

The proposed Kidlington site is not in Oxford City.

These case studies are not at all relevant to this application and do not provide a precedent for building on green belt land.

It is clear that OUFC management's failure to consider the future of their club, and to negotiate contracts with the Kassam owners for the longevity of the site (60 years) is outstandingly poor business.

Green belt cannot be overruled as a result of such bad business decisions or weak business management. These are commercial decisions, and are not the concern of the people of Kidlington who would-be left to pick up the pieces of this.

What will OUFC do if the same poor management leads to a future disagreement with their new owner? Will they seek to demolish this site in Kidlington, and build another stadium elsewhere?

Biodiversity Net Gain

The application claims that this site isn't highly biodiverse. This is entirely false. The site is rich in biodiversity including, but not confined to, great crested newt, badgers, and bats. These are all protected species.

Since 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 multifunctional 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?

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

Traffic and transport

The planning statement anticipates there will be 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 only be available for around 80 cars.

The Kidlington roads where we live, work and study, are already congested. Where is the Air Quality Management Plan that supports the addition of up to 18,000 additional cars on football match days?

There is no evidence that supporters (that don't currently use public transport to attend Kassam), will suddenly change their travel habits and travel by more expensive trains, simply because of this proposed move to Kidlington. Supporters can travel to Oxford Railway Station for Kassam now and, according to OUFC's own evidence, they broadly do not do this.

There is therefore no current evidence that supporters use the train or will use the train to attend a new site.

Where is the UK case study evidence to demonstrate that football supporters will suddenly move their journey habits to rail?

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 - 'that forms the sustainability claim of the application', would result in majority supporters taking rail transport to this new ground.

There is no plan for the additional congestion, traffic spill, double parking and increased automotive exhaust emissions that will ensue from this ill-considered application. This will cause considerable harm and safety issues to local children and older residents.

The plan to install a crossing over Frieze Way (which it appears is already now being constructed by Oxfordshire County Council Highways as part of roundabout adjustments, and before this application even being considered by Cherwell District Council Planners!), effectively agrees that parking will spill over into Kidlington residential streets.

Supporters that travel by train or bus (as the application proposes), would be on the other side of the roundabout and would have no other reason to cross Frieze Way to and from Kidlington.

It appears that this move to install a Crossing at Freize Way is an acceptance that this application has already been agreed, pre-planning. This looks highly suspect!

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 (most will need to make two or more), 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 83.1% 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?

## Construction

The talk of a Route Map for Avoidable Waste in Construction could be better delivered by not constructing this new site.

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 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 owners 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? Even if it were relevant, this is clearly not taking into account the embodied CO2e within the existing Kassam Stadium.

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?

In reality, we see an application with vaguely aspirational goals to be diluted if they use too much capital funding and start to look like they might become 'economically unviable'.

A voluntary BREEAM 'Very Good' equates to 55% of what an outstanding build would look like. this is what BREEAM 'very good' means. This application demonstrates that neither OUFC or its new owners have any will to build a sustainable or world class stadium.

	Instead, a cheap and quick build to satisfy the financial benefits of its overseas palm oil investors.
	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 of these 'aspirations' will be delivered.
	Buildings account for 37% of total GHG emissions; How can Oxfordshire County Council (OCC) 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?
	OCC may wish to consider compulsory purchase of Kassam, since they appear to feel that an unnecessary football ground outweighs the legalities of green belt land. If OCC feel so strongly about the need to assist OUFC, they should interject into the negotiations with Mr Kassam about coming to an agreement over a perfectly good and established football ground; A ground that has built-in potential and foundations to deliver 16,000 seats.
	Given that OUFC have never, in their history, achieved a capacity crowd (one of the reasons that the fourth stand was never erected), the Kassam would look to be more than adequate for their needs.
	Yours faithfully
	L Asbury
	Resident
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Attachments	