

Comment for planning application 24/00539/F

Application Number	<input type="text" value="24/00539/F"/>
Location	<input type="text" value="Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station Oxford Road Kidlington"/>
Proposal	<input type="text" value="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	<input type="text" value="Laura Bell"/>
Organisation Name	<input type="text" value="POETS (Planning Oxfordshire's Environment and Transport Sustainably)"/>
Address	<input type="text" value="c/o 5 Sunningwell Road, Sunningwell, Abingdon, Oxon, OX13 6BJ"/>
Type of Comment	<input type="text" value="Objection"/>
Type	<input type="text" value="neighbour"/>
Comments	<p>I wish to add a couple of further points to the earlier submission (reproduced below for ease of reference) on behalf of POETS.</p> <p>The first is to make it clear that without satisfactory answers to the questions we have raised you should consider our comments as an objection to the current planning application on environmental, transport, climate and other sustainability grounds.</p> <p>The second is prompted by articles in the local press on the financial performance of Oxford United, and a recent study of the financial stability of smaller football clubs by Kieran Maguire.</p> <p>The club argues (see Para 9.106 of the planning statement submission) that its proposal for inappropriate development in the green belt should be permitted on the basis that very special circumstances apply. These are stated to be the need for a new stadium to protect OUFC.</p> <p>The current owner of the Kassam (Firoka Ltd) has stated publicly that the club is able to stay at the existing stadium.</p> <p>The other part of the club's argument is that the additional revenue streams would give it financial viability. It seems very doubtful to us that giving a particular enterprise what amounts to a subsidy would constitute very special circumstances sufficient to overcome the presumption against inappropriate development in the green belt, in what is a critical remaining part of the Kidlington gap. However, in any event it appears that there is no guarantee that OUFC would own its own stadium or the proposed hotel - or indeed benefit from the additional matchday and other revenues. It is therefore not possible for the club to argue, on that basis, the existence of the very special circumstances needed to justify inappropriate development in the green belt.</p> <p>Linked to this, and given the very serious questions raised in the press about the club's financial viability, what guarantees does the county council have that it will get paid for the land or the cost of demolition of the stadium if the enterprise proves to be financially unsustainable?</p> <p>Finally it would be helpful if you would let us know when you will be able to answer the questions we have already asked in our initial submission.</p> <p>Previous comments reproduced below for ease of reference:</p> <p>I am writing on behalf of POETS (Planning Oxfordshire's Environment and Transport</p>

Sustainably), a group of planning, environmental and transport professionals and academics. We are concerned to see that development in Oxfordshire is as sustainable as possible, taking particular account of the climate emergency which all Oxfordshire's local authorities have declared.

Addressing the transport implications of the proposal will be a significant part of the work required to determine the planning application. At a minimum, the club and council will need to address the following questions:

- a) How do people currently travel to the Kassam stadium and where do they come from?
- b) How would this pattern of travel change at the proposed triangle site?
- c) How much capacity exists at existing car parks, such as Water Eaton and Pear Tree Park & Rides on match days?
- d) If park and ride car parks are full of football traffic on match days what impact will this have on traffic driving into Oxford - particularly on Saturdays? Conversely, if the car parks are already full of shoppers' cars by the time football supporters arrive, how will this be managed?
- e) How long would it take for motorists to get out of any designated car parks after the match and how can people be persuaded to use them rather than parking elsewhere?
- f) How would on-street parking in Kidlington and the wider area be managed on match days?
- g) How would off-street car parks in the area - both private and public - including locations such as Cutteslowe Park be managed and controlled?
- h) How would the additional demand for bus and train travel be met? How long would people have to wait for a bus or train after a match?
- i) The application suggests that a very high and growing proportion of spectators will travel by public transport, walking or cycling. What measures are contained within the proposals to ensure that this will be the case? How will the safety of those travelling by these modes be secured, given that the triangle site is surrounded by busy main roads?

The application does not appear to provide satisfactory answers to these questions. This takes on added significance in view of the fact that:

The application purports to include "Car and cycle parking, access and highway works, utilities, public realm, landscaping and all associated and ancillary works and structures"

However, the application does not include provision for the safe passage of thousands of match day spectators to enter or leave the stadium on foot, by bike, or by public transport. In particular, the proposals do not include any clear information about how this is to be achieved given the proximity of busy main roads immediately to the west and east of the site. Pedestrians will of course need to cross Oxford Road to travel to and from Oxford Parkway station and the associated car park

Moreover, we understand that the transport modelling and other information provided with the application is to be withdrawn and replaced, meaning that the current consultation is based on flawed information. This makes it very difficult, if not impossible, for members of the public and other interested parties to comment.

In view of these deficiencies in the application, the local planning authority should provide a full explanation as to how and why it chose to validate it.

It would appear that the fairest way to proceed now would be for the current application to be withdrawn, and for a new application to be submitted which contains a) corrected and comprehensive transport information and b) details of how match day crowds will be able to access and leave the site safely.

Could you please indicate that this is what will happen or, if not, how the district council now propose to deal with the application?

Could you please confirm that National Highways have been consulted, in view of the proximity of the site to a part of the strategic road network which is frequently heavily congested? Could you also please provide details of what pre-application discussions have taken place both with National Highways and with the county council as local highway and transport planning authority?

Information has been placed in the public domain indicating that Oxford United were offered the opportunity to continue to use the Kassam Stadium. This would appear to raise questions as to whether the "very special circumstances" exist which would justify developing the last remaining part of the green belt in the gap between Kidlington and Oxford.

The application makes much of the sustainability credentials of the proposal, and in particular claims that it will be "low carbon". To assess the validity of these claims, any assessment of the proposal will need to take account of both the embedded carbon within the existing Kassam stadium and the embodied carbon involved in building any new stadium. Could you please explain how and when this assessment will be undertaken, and the public have an opportunity to be consulted on it?

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Attachments