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Cherwell District Council
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19 April 2024

Dear Sir/Madam,

Planning Application - 24/00539/F

Land East of Stratfield Brake and West of Oxford Parkway Station (known as 'The Triangle')
proposal for a stadium for Oxford United Football Club (OUFC).

Please find set out below our comments to **OBJECT** to this planning application. Our response seeks to address two issues: Firstly, the Woodland Trust's interests as the lessee of the Stratfield Brake woodland site, and secondly our views on the proposals as a national authority on woods and trees, and a protector of the benefits and value that they deliver for climate, nature, and society.

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees, and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own or manage over 1,250 sites across the UK, covering around 23,000 hectares (57,000 acres), including sites in Cherwell at Stoke Wood, Piddington Wood and Daeda's Wood as well as Stratfield Brake, and we have 500,000 members and supporters nationwide.

Impact on Stratfield Brake

The proposed development will be sited directly east of the Woodland Trust-managed site at Stratfield Brake, (grid ref: SP494119). It is separated from the Triangle site by the A4260 Frieze Way. This is an 18.32 ha designated wildlife site, with priority deciduous woodland, including mature oak woods, and wetlands. The grassland is also conservation grazed by cattle which have helped to increase the diversity of insects, flora, and fauna on the site, including butterflies.

- **Drainage**

Stratfield Brake is a low-lying site, adjacent to the Oxford Canal. The woodland can be wet which presents challenges for management, and some paths can be very wet during the winter

and early spring. While areas of wetland are a feature of the site, there are ongoing problems with flooding/drainage.

We have concerns that the drainage problems will be exacerbated by the stadium proposals which will reduce the current natural drainage capacity of the Triangle site, creating increased pressure on Stratfield Brake.

Between the Sports ground and the Woodland Trust site, there is already a problem with a ditch/drain system that will need to be further excavated if more water were expected to run into this watercourse as it appears to be already running at full capacity.

A full testing of the current drainage system through the site will need to be conducted by a Third Party and any assessment of possible further capacity fully documented, plus a plan of how ditch maintenance will be carried out, in line with the Trusts own water management policies in woodland sites.

A Stadium of this size will have considerable water discharge and the Trust would need to see how this will be managed without flooding the Stratfield Brake site.

The Woodland Trust is particularly concerned about the likely changes to the hydrology altering ground water and surface water quantities. The introduction of water run offs from the stadium development will result in changes to the characteristics and quality of the surface water because of pollution/contamination and the increase in water volume will add to the operational and management challenges for the site.

We note that the application refers to a drainage strategy, providing onsite attenuation in the form of ponds and geo cellular crates. Other SuDS features like rain gardens, swales and filter drains will also provide some attenuation. **We ask that this provision be of a scale and capacity sufficient to protect Stratfield Brake from additional run-off and that this is secured by planning condition.**

- **Car Park**

The small car park adjacent to the entrance of Stratfield Brake, is owned by Oxfordshire County Council and leased to the Parish Council. It is very well used by visitors to the woodland and already rutted and potholed: we are concerned that it will be used by ticket holders to the Stadium looking for local free parking.

The operators of the Stadium would need to consider the impact on this small car park, and how visitors to the Stadium will be prevented from parking here. It is asked that any Plan going forward for the site considers the impact on the car park, to ensure that visitors to Stratfield Brake can still access the woodland.

We note the proposal to introduce Controlled Match Day Parking Zones up to 2km from the Stadium to prevent supporters parking on nearby residential streets. We ask that the operators of the Stadium be required to **provide an event day car parking attendant on the Stratfield**

Brake site to prevent stadium visitors parking there, and that this be secured by planning condition.

- **Increased Litter**

We note that the application suggests that the volume of waste generated per event day is likely to be 12.8 tonnes. Although waste management measures are mentioned, we are concerned about litter generated outside the stadium site by attendees.

The Trust and its volunteers already spend considerable time around the site picking up litter that is thrown from passing cars. In a recent study, Keep Britain Tidy estimated that 2.9 million small mammals - like shrews, hedgehogs, and voles - are killed each year after getting stuck in bottles and cans thrown onto grassland and parks.

We ask that the stadium operators be **required to put measures in place to pick up litter around the Stadium site**, and for picking up additional litter that would end up **within the woodland**, on and immediately after event days, and that this be secured by planning condition.

Impact on trees and woodland

Government targets for woodland as part of the national Nature Recovery Network include increasing tree canopy and woodland cover from 14.5% to 16.5% of total land area in England by 2050, with an interim increase in tree canopy and woodland cover of 0.26% by 31 January 2028.

Woodland cover in Oxfordshire is significantly lower than the national average. Considering its existing woodland cover, the area (LSOA) including the Triangle site has tree cover of 11%: other urban LSOAs in Kidlington have 10-12% tree cover (as shown in the UK Tree Equity Scorecard). Additionally around 93% of Oxfordshire's 3,600 or so woodlands are very small (less than 2ha in area).

Any major development should therefore seek to make a positive contribution to protecting existing and establishing new woodland, in particular publicly accessible woodland. This priority is reflected in adopted and emerging local policy.

The adopted Cherwell Local Plan (2011) policy ESD 10 (Protection and Enhancement of Biodiversity and the Natural Environment) states that the protection of trees will be encouraged, with an aim to increase the number of trees in the District. Development proposals will be expected to incorporate features to encourage biodiversity and retain and where possible enhance existing features of nature conservation value within the site. Existing ecological networks should be identified and maintained to avoid habitat fragmentation, and ecological corridors should form an essential component of green infrastructure provision in association with new development to ensure habitat connectivity.

The emerging Cherwell Local Plan 2040 sets priorities for the Kidlington area including protecting areas of green space of high natural capital and nature recovery value. Draft Core

Policy 80 (Kidlington Green and Blue Infrastructure) states that the Council will require all development proposals to protect and enhance green and blue infrastructure and assets in the Kidlington area.

The strategic principles for the site set out by Oxfordshire County Council include maintaining a green barrier between Oxford and Kidlington and protecting and enhancing the surrounding environment, including biodiversity, connecting habitats, and supporting nature recovery; and improving public access to high-quality nature and green spaces.

The County Council's Tree Policy for Oxfordshire states that the Council recognises the urgent need to increase canopy cover in Oxfordshire. On strategic developments, the County Council will seek to ensure that the landscaping plan will specify and demonstrate widely distributed tree cover (or equivalent green infrastructure) in the public domain to achieve at least 30% canopy cover within 10 years. **We therefore ask that a canopy cover target be set for the stadium scheme as a whole**, retaining the maximum number of established trees, with new planting wherever possible across the site.

We note the application states that 143 new trees would be planted within the site, including 81 trees of extra heavy standard or above, approximately 2,000m² of scrub planting and 350 linear metres of native hedgerow. We ask that this **planting is secured by planning condition** and that the trees selected are **native tree species from UK sourced and grown stock**, for biodiversity resilience and biosecurity.

We are concerned to see that the plans propose the removal of some established trees, including two TPO oak trees on the eastern boundary of the site. We ask that the **retention of these important trees** be required and secured by planning condition.

As BBOWT has previously noted, part of the Stratfield Brake District Wildlife Site (DWS) is located within the red line boundary, and other parts of the DWS lie in close proximity. It includes an area of high wildlife-value woodland that lies directly within the red line boundary. We note the commitment in the applicant's landscape strategy to protect the priority woodland to the south of the site: we ask that this be secured by planning condition, with a **minimum 15m buffer comprised of green infrastructure** and that a **suitable management plan**, to ensure the woodland is restored and maintained in good ecological condition, is provided.

The Ancient Tree Inventory (ATI) for the area may be incomplete. We therefore recommend an exercise to **complete the ATI** (which lists ancient, veteran, and notable trees outside woods) across the site, to comply with the requirements of the NPPF (paragraph 186c) for the protection of irreplaceable habitats.

Woodland and woodland dependent species are vulnerable to light pollution. We echo BBOWT's request that **lighting from the stadium and associated facilities must be directed away from the hedgerows and woodlands**, and light spill into these areas should be avoided through use of cowls or equivalent.

Site management

We note the reference to the Woodland Trust in Volume 3, paragraph 8.2.15 of technical appendix 8 (Ecology and Nature Conservation) of the planning application Environmental Statement: *"It is understood that the land managed by The Woodland Trust (acquired as part of a long 250-year lease from the Oxfordshire County Council (OCC) in 1997) does not include the land to the south of the Site (i.e. east of the A4260). A member of the development project team conducted a site visit with a member of the Woodland Trust on 25th April 2023. At that meeting, the Woodland Trust were offered the opportunity to take on the management of this section of woodland (west of the A4260) and to include it as part of the Stratfield Brake nature reserve. However, the Woodland Trust declined the offer and gave a view that the woodland is too isolated and is best suited to non-intervention management in any event."*

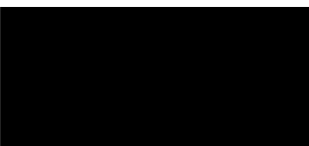
The Woodland Trust manages the land known as Stratfield Brake to the west of the proposed development site. We confirm that one of our regional team met a representative of Oxford United FC in April 2023 and they had an informal discussion about management of the established woodland within the proposed development footprint. However, the Woodland Trust has had no conversation with any party about taking on the management of the woodland. We have had no formal offer to take on the management of this woodland, and therefore have not declined any offer.

Conclusion

The Trust **objects** to the current proposed development until our concerns are fully addressed. This includes **measures to protect trees and woodland** on and adjacent to the development site; and to provide adequate **drainage arrangements, parking controls and litter collections**, to ensure that any potential damage to our site will be alleviated entirely.

We hope you find our comments to be of use to you. If you are concerned about any of the issues raised by the Woodland Trust, please do not hesitate to contact us.

Yours faithfully,



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