

# 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>	Lesley Stevens
<b>Address</b>	2 Briar End, Kidlington, OX5 2YB
<b>Type of Comment</b>	Objection
<b>Type</b>	neighbour
<b>Comments</b>	<p>1. Traffic congestion and road closures - these should be major concerns for the councils: Road closures (referred to as 'diversions') are planned despite Oxfordshire County Council's statement that the Oxford Road cannot be closed. This is totally unacceptable from an access perspective in restricting residents of Kidlington accessing their local area and also travelling to/from Oxford city centre; also this will cause issues in the event of emergencies (ambulances, fire, policing, terrorist activity etc) and alone offers a significant reason why the County Council must object to the planning application.</p> <p>Road closures for "at least 30 minutes" before and after matches are planned on matchdays which include Saturdays. 30 mins is a minimum and we expect that much longer delays are probable in practice. What happens if there is an 'incident' between home and away supporters? You can imagine that police would wish to cordon off the entire area!</p> <p>It is mentioned that key bus services and coaches will be marshalled through Oxford Road during periods of lighter pedestrian flows". 30 minutes is a short period of time to move 16,000 people so lighter flows will be unlikely in this time. This means bus delays on matchdays which include Saturdays, and is a restriction/burden to local residents of Kidlington. The diversion route is already heavily congested and there will be even more traffic when the diversion is in place and people are trying to access the stadium.</p> <p>The amount of Park &amp; Ride parking in the area and particularly Oxford Parkway Station will encourage fans to travel by car thus adding to congestion. The proposal states that 'many of our fans live within 20 minutes walk, cycle, or on public transport of the proposed location' - this is nonsense and incorrect: the main fan base is in East Oxford and public transport, cycling or walking would be a challenge. Football fans NEVER come to a match on foot or cycle!!</p> <p>There is no evidence that many supporters will travel by train, most of the League One fans would find this very challenging and expensive. We understand that research shows that 83.1% of supporters currently travel by private car/van. The club "has an aim that 90% of fans will travel to the Stadium by sustainable modes" but no realistic means of achieving this. It is therefore probable that most fans, attracted by parking at Park &amp; Rides, are likely to travel by car.</p> <p>New pedestrian crossings on the Oxford Road and Frieze Way will cause even more congestion on the Kidlington Roundabout and Peartree Roundabout, particularly if events/matches at the proposed site coincide with heavily-attended events at Blenheim Palace. There have recently been severe delays caused by the construction of the new roundabout at Kidlington delaying entry or exit into Sainsbury's supermarket by over an hour. Football matches are likely to cause even greater problems and delays.</p> <p>What about the safety of non-football cyclists and pedestrians who want to use the pedestrian paths and cycleways on matchdays and find themselves caught up in large numbers of fans? This is an unwarranted restriction on movement of individuals just to</p>

satisfy the needs of football fans!

Concerts are "not proposed" but they will be if the opportunity arises! What about traffic management for these and other large events that are likely to take place? OUFC CEO has stated that he wishes the new stadium to be used 365 days a year, so this further impingement is likely on local residents.

Thames Valley Police concerns that fans won't use designated crossing routes have not been addressed.

Traffic holdups have the potential to affect the strategic road network (eg A34 & A40)

## 2. Parking provision

184 parking spaces and 2 coach bays in total on site is inadequate given current established supporter travel patterns. What happens if OUFC get promoted to higher divisions with much larger clubs and fan bases wishing to attend matches? The entire area of Kidlington will be gridlocked all day!

Inadequate onsite parking will lead to the loss of community parking facilities at the Park & Ride with knock-on impacts to businesses in Oxford due to loss of trade as commuters switch to other more accessible shopping destinations. Oxford city centre retail activity is already dying on its feet and the inability to shop in Oxford will only accelerate this decline.

Cycle parking should be provided at 1 space per 50 seats. That is 320 spaces rather than the 150 proposed. OUFC is planning to use the Oxford Parkway cycle racks which is not acceptable and against local transport policy.

There is little evidence to suggest that incentives for fans not to park at Oxford Parkway will be effective.

The club has little influence over the travel patterns of away supporters.

Match Day Controlled Parking Zones (CPZs) are proposed. This indicates that the applicant knows that a significant number of fans will continue to travel by car and will cause significant issues for local residential areas.

Match Day Controlled Parking Zones (CPZs) will be implemented up to 2km from the Stadium in Kidlington, North Oxford and Yarnton. These will operate during matches (Saturday and evenings) and will discourage supporters travelling to stadium by car and parking on nearby residential streets on match days. These Match Day CPZs will dovetail with the parking management strategy emerging for the PR Sites around Kidlington and Oxford Parkway.

CPZs on residents cannot be imposed unilaterally to serve the whims of OUFC. Moreover, this will not discourage supporters from parking on residential streets? Surely it should be prevented? If the Park & Rides are full of fans' cars, where will users who wish to use the P&Rs to access Oxford and the hospitals park? If the P&Rs (especially Oxford Parkway) are already full when fans start to arrive, what plans are in place to manage this?

How would parking in other areas such as Stratfield Brake, Exeter Hall and Cutteslowe Park's two car parks be managed to ensure continued use of these areas is possible for other users?

## 3. Government policy and guidance: Green Belt

The NPPF (National Planning Policy Framework) states that inappropriate development on the Green Belt is not allowed unless there are 'very special circumstances' (VSC).

OUFC acknowledges that the stadium is inappropriate development but tries to justify it with 'very special circumstances' as follows:

a. The club has to find a new home by 2026. We all know that the club has intentionally made itself homeless and hasn't tried to negotiate to stay at the Kassam Stadium (because it doesn't want to) so can't claim this as a VSC.

b. There is no other available suitable site. We know that the Alternative Sites Report was pre-determined because it was prepared to provide "justification for the application site, which is the Club's identified location for the stadium and ancillary facilities". (Alternative Sites Assessment para 1.2).

c. OUFC said it looked at over 60 other location alternatives within a 7km catchment area -

why hasn't the list of those alternatives been published? Do they exist? Who set the arbitrary radius of 7km? Why hasn't a brown field site been looked at (e.g. Didcot?).

d. There will be benefits to the Club associated with the financial sustainability of owning their own stadium. There is no guarantee that the club will own its own stadium, in fact it is likely that it will not as this will be owned by financial institutions and major investors! Nor is it likely to own the conference facilities, or hotel, or the commercial retail sites that it thinks will generate revenue. Even if the current owners say OUFC will own these the club could be sold and the situation could change overnight.

e. Economic benefits: FoSB says much of this could be delivered at the Kassam Stadium where it would arguably be of more benefit. And again the figures seem overly optimistic. The economic disadvantages to Oxford's city centre are overlooked. Full Park & Rides because the fans got there first and additional traffic will not help struggling retail outlets in the City.

4. Environmental benefits:

a. The most environmentally friendly solution is to stay at the Kassam Stadium, particularly with the Cowley Branch Line in the pipeline. 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.

b. Remember that residents of Kidlington are voters and many care about the environment - allowing this stadium to destroy the environment will be reflected in future voting at the ballot box!

c. Sustainable travel: OUFC "has an aim that 90% of fans will travel to the Stadium by sustainable modes" however there is no effective strategy in place to achieve this. Many (or based on current travel patterns, most) fans will be attracted to the parking at the Park & Ride sites. The potential for OUFC to impact how away fans travel is limited.

d. Biodiversity enhancement: The development will not deliver a 10% biodiversity net gain.

e. Improved access to the Green Belt: How can a football stadium provide this? The amount of open Green Belt and green space will be minimal. The garden area is only about the size of the Kidlington Roundabout and the heavy footfall will mean it won't stay green for long. Also, on match days the plaza and garden will be a fan-zone, so we presume only really accessible to the general public on other days! No public rights of way are being created over the site.

f. Nature conservation

As a member of the BBOWT I object to the taking of more green belt land away from wildlife and their habitats, which cannot be replaced once gone! The Council states that it has green credentials but the felling of any trees and the destruction of green belt land is against those fundamental principles of being green.

The bat and reptile surveys which took place from August 2022 to October 2022 were not conducted properly. The resulting data is therefore unreliable and must be repeated. The number of breeding bird surveys is insufficient and the timing, only in June, missed the important March - May period. Further survey work is therefore required for an accurate assessment of breeding birds.

f. Plans for a proposed wildlife-rich green area at the northern tip of the site are totally unrealistic. This area and the northern plaza will be a fan-zone on matchdays! With 16,000 or more people on site, and the location of the green area next to public areas designed for socialising etc, the probability of this area remaining green and enabling wildlife to thrive is zero. (This area is a key part of the flawed strategy for a 10% Biodiversity Net Gain).

g. BBOWT previously commented that it would be necessary to have segregated areas with no public access. Cherwell DC's Ecology Officer also stated: "The very high level of public use of the site which will occur at certain times will necessitate some areas to be retained and managed solely for biodiversity to ensure habitats can function". The planning application seems to entirely ignore these fundamental recommendations which were made at an early stage by important stakeholders.

h. The development will not achieve the 10% Biodiversity Net Gain required by the emerging policy, Core Policy 14: Natural Capital and Ecosystem Services (CP14) which is included in the draft Cherwell Local Plan Review 2040.

i. The ecology report understates both the level and abundance of biodiversity that exists on the site and on the adjacent woodland to the south. (NOTE: this woodland is adjacent to the site, not part of it but will be impacted).

j. There is no plan for ongoing management for diversity, any plan would be dependent on the financial security of OUFC which is not a certainty.

k. There is evidence the woodland to the south of the site is in fact Ancient Woodland and it requires more protection than is currently planned, including an appropriate buffer zone. This strip of woodland is included in the proposed Nature Recovery Network for Oxfordshire by Thames Valley Environmental Record Centre (TVERC) as part of a 'Core Zone' ie of the 'highest nature value', existing wildlife areas.

l. Bats, including rare species such as Barbastelle, use the site, particularly the southern area by the woodland. This woodland contains many bat roosting opportunities. An independent ecologist's report by Dr Judith Webb records 161 invertebrate species including 42 beetles, 17 butterflies, 7moths, 1 lacewing, 4 dragonflies & damselflies, 20 true bugs, 17 bees & ants & wasps, 1 sawfly, 6 grasshoppers & crickets, 30 true flies, 2 molluscs, 14 spiders & harvestmen. Dr Webb also states this is just a small range and nothing like the full species diversity of invertebrates that will be present.

m. The non-intensive rotational willow coppice management of the site centre has helped to maximise biodiversity on the site, especially of flowers and invertebrates. Willow can support a big total of invertebrate species; one quote is up to 450 dependent species, which will include: bugs, bees, beetles, flies and moths.

n. In her report on the woodland Dr Webb also explains the important inter-relationship between the woodland and the site which would be completely lost as a result of the development. As Dr Webb observed, insects which breed in the woodland will be using flowers on the site as a food source.

o. The proximity of the development including the car park, the southern area and the stadium itself to the woodland is a serious concern. Destruction of woodland can occur by development near or immediately adjacent as a result of hydrology change, light pollution, noise pollution, too much public access and trampling of flora, litter, flower-picking/digging, fires destroying trees or deadwood. There is an obvious potential for all of these dangers to the woodland and the protection measures as currently planned are grossly inadequate. The planned deterrent to entering the woodland will be a hedgerow (as yet to be planted), scrub planting and attenuation features. This will be ineffective with 16,000 people onsite.

#### p. Impact on trees

The proposal will result in the total loss of 17 trees; 5 groups of trees and the partial loss of 2 groups of trees. The protected and biodiverse woodland to the south of the development will be adversely affected by pollution, light, noise etc

Measures to 'deter' access are totally inadequate. Large numbers of people onsite will inevitably lead to overspill into the woodland. The planned deterrent to entering the woodland will be a hedgerow (as yet to be planted), scrub planting and attenuation features. This will be ineffective with 16,000 people onsite.

Two oaks with Tree Protection Orders (TPOs) are planned for removal to allow access. These have bat roosting potential and are protected by TPOs for a reason and should therefore remain.

#### 5. Drainage and flood risk

a. The site is susceptible to significant surface water flooding. In recent wet weather (end of 2023/early 2024) the site has acted as a holding area for vast quantities of water, and has absorbed run-off from the Oxford Road during heavy rain.

b. The stadium development will mean that run-off from the Oxford Road has to go elsewhere and this could result in the road and other local flooding.

c. What will the cumulative effect of the developments in the area have on flooding? This will become more important as climate change progresses

#### 6. Design, appearance and materials

a. The Design and Review Panel report says: "there is a general feeling that everything is ever so slightly squeezed and that there is no spare land." This is clearly overdevelopment in an attempt to fit too much onto a constrained Green Belt site.

b. At nearly 25m high the stadium will dominate the landscape and will be obtrusive in what

will eventually be a largely residential area on the outskirts of Kidlington, which retains its village status. Architects' photographs used are computer-generated so as to reduce the planned height of the stadium to make it appear smaller than it actually will be.

## 7. Landscape impact

- a. The stadium, at nearly 25m high, and covering most of the site, would dominate the landscape. It would transform an area that is currently not really apparent and be an overbearing feature in what will be a largely residential area.
- b. It would also urbanise the last remaining Green Belt gap between Kidlington and Oxford and impact the setting of the Stratfield Brake Nature Reserve.
- c. It is clear that there will be permanent and significant adverse effects on the surrounding landscape.

## 8. Environmental pollution e.g. noise

Increased traffic will lead to increased air pollution in the area, to the detriment of Kidlington both pre-, during and post construction of the stadium. Furthermore, increased traffic on the Banbury Road from North Kidlington to the stadium will be severe, as fans seek alternative ways of accessing the stadium.

More light pollution including on Frieze Way which is currently unlit. This could adversely affect the wildlife on the Stratfield Brake Nature Reserve eg bats.

## 9. The Cherwell Local Plan

The stadium is not included in the Local Plan. The site was left as Green Belt. The Planning Inspector noted that, on this basis, ".the overall sense of separation between Kidlington and Oxford in particular, would not be harmfully reduced." Development of the site will remove the last remaining separation of Kidlington from Oxford.

## 10. Other major points of objection:

### a. Entry, Exit and Evacuation and Major Incidents/Disaster

The site is: bounded by busy roads, is too small for the level of proposed development, is constrained by features such as the car park, woodland and attenuation ponds.

There are few access points into the site and there is a difference in level from the highway to the stadium. In the event of an emergency it is impossible to see how the stadium could be safely evacuated within 8 minutes. Similarly it is impossible to see where people could muster safely.

The planning application lists laws and regulations but fails to address key safety issues.

In general there is a lack of safety both for spectators, for users of the adjacent roads, and members of the public who are not involved in the football.

There is also insufficient room to allow for segregation of home and away fans.

Critically, the Design & Review Panel (which the local authority should have regard to) commented:

"There is a concern that the proposed main entrance area point to the stadium may not be able to safely accommodate the sheer volume of fans. It is felt there may not be enough arrival space to accommodate the supporters before they disperse to their seats. A lack of space in this area could also give rise to problems of supporter segregation. The practical problems of access are also accentuated by the difference in levels from the highway."

This is clearly a safety issue.

The safety issues around access to and egress from the proposed stadium site are not addressed in the documents supporting the application other than by a request for the planning consent to be conditioned.

### Oxford Parkway Station Safety

- a. This station is a village location, is small and unsuitable for crowds of fans, mixing both home and away, and arriving en masse. The platforms are narrow as is the footbridge across the track.

b. Fans and other users will be at risk. It is possible that Oxford Parkway will be turned into a 'fighting ground' along with the associated litter, bad behaviour and graffiti that might result.

#### Funding for the stadium

- a. Construction on the Kassam Stadium was held up for many months as a result of funding issues. It still only has three sides. How will a similar situation be avoided?
- b. Indeed, how will Cherwell District Council put faith in OUFC, with its poor financial history and its funding stream always at the mercy of the owners (who may change), to fulfil any of its commitments/aspirations/aims or even to provide the funding to build the stadium in the first place.

**Received Date**

21/04/2024 21:17:29

**Attachments**