

I am writing to formally object to the proposed construction of a new Oxford United stadium near Kidlington. While I recognise the potential benefits a new stadium could bring, I believe the negative impacts on the surrounding area outweigh these advantages.

This letter outlines my specific concerns regarding the development, listed under the headings below. I urge you to carefully consider these issues before approving the project.

I am a resident of Kidlington and have chosen to start a family here and believe this development would significantly impact the quality of life in the community.

Thank you for your time and consideration.

### **Loss of Green belt**

Policy ESD 14 in the Cherwell local plan seeks to protect the Oxford Green Belt, establishing 5 aims that mirror those of paragraph 143 in the National Planning Policy Framework (NPPF). Those aims include: 'Prevent the coalescence of settlements' and 'Check the growth of Oxford and prevent ribbon development and urban sprawl'. Policy ESD 14 goes on to say 'Development within the Green Belt will only be permitted if it ... does not conflict with the purposes of the Green Belt'.

Given the proposed stadium site encompasses all the remaining green belt between Oxford and Kidlington roundabout West of Oxford Road, it will lead to: the coalescence of Kidlington and Oxford, further growth of Oxford and additional ribbon development along Oxford Road. All of which are specifically contrary to the purposes of ESD 14.

Indeed, the site is a particularly significant and vulnerable piece of the green belt – part of the so called 'Kidlington Gap'. The specific importance and vulnerability of the Kidlington Gap is noted in paragraph B.260 of the local plan and was noted in the report of the planning inspector on Cherwell's local plan review. This is particularly acute now that most of the previous green belt between Oxford and Kidlington was removed and allocated for housing.

### **Loss of Bus lane**

The proposed plans show the removal of the existing southbound bus lane on Oxford Road from a short distance after Kidlington roundabout through to the entrance to Oxford Parkway. This will lead to increased bus journey times and decreased reliability between Kidlington and Oxford, which is a heavily used bus route, designated as a 'Premium Bus Route' in the Central Oxfordshire Travel Plan (COTP).

The removal of the bus lane would clearly go against the COTP, that, under action 13, notes the importance of improving bus journey times, specifically: '*Where it provides a benefit to buses, it is vital that existing bus priority infrastructure is retained*'.

Policy SLE4 of the local plan says that '*All development where reasonable to do so, should facilitate the use of sustainable modes of transport to make the fullest possible use of public transport,*' clearly by removing the bus lane this development is not facilitating the use of public transport for people travelling between Kidlington and Oxford – quite the opposite in fact.

Application 23/01233/OUT included a similar, but putative, proposal to remove the bus lane which Oxford Bus Company noted that they could not support and would make it difficult for Oxfordshire County Council (OCC) to meet conditions imposed as part of the ZEBRA bus fleet replacement.

### **Blocked Cycle Route**

Oxford Road is heavily used by cyclists, particularly commuting into Oxford, and is designated as part of National Cycle Network 51 and an Active Travel Primary Route in the Central Oxfordshire Travel Plan. Section 6.6 of the match day travel plan states that traffic will be diverted for **at least** 30 minutes pre and post match. As cyclists are not mentioned, it would appear that they too are prevented from using this stretch of road.

There are no good alternative routes for cycling between Kidlington and Oxford. As the recent tragic death of a cyclist shows, Frieze Way is not safe route for cyclists, meaning the only remaining option is via Begbroke, a diversion of several miles. Removing this route will present particular problems for evening kick-offs – road closures of 30 minutes will already be impacting the tail end of the evening rush hour, longer pre-match closures will have a serious impact on those commuting between Oxford and Kidlington by bike.

In paragraph 3.3.5 of the match day travel plan – fans cycling to the match are to be directed to park at different locations (stadium from the north, Oxford Parkway from the south), so that they don't have to pass through the closed section of Oxford Road. However, there is no consideration given to local residents who would otherwise cycle between Kidlington and Oxford at these times.

Therefore, measures must be taken to ensure that Oxford Road remains usable by cyclists. Perhaps this would be achievable by a planning condition requiring the cycle lane to be marshalled between Kidlington Roundabout and Oxford Parkway, or similar? If this is not possible application should be rejected.

### **Parking Issues**

The application proposes a CPZ to extend 2km from the stadium. It is unclear why the CPZ should not extend to cover the entirety of Kidlington. Given the good bus services and the fact all 6 of Kidlington's pubs are more than 2km from the proposed stadium, it is likely that a significant number of fans will choose to park in North Kidlington, outside the proposed 2km CPZ.

Additionally, there appear to be no measures to prevent football usage overwhelming car parking at local parks. In particular, Cuttleslowe park is popular with families from across Oxford and further afield. Consequently, being unable to park there would represent a significant loss of amenity for the park's many users. Similar arguments also apply to Exeter Park and Exeter Hall in Kidlington.

### **Inadequate site selection**

The justification for the selection of the proposed development site and consequently the very special circumstances for building on the green belt rests on the correspondence from

the Football League stating that they would accept a relocation within 7 miles of the centre of Oxford. However, this raises questions. Should the rules of a private company (i.e. the Football League) take precedence over the need to protect the green belt as enshrined in the NPPF? Given the Football league has previously approved at least 3 relocations that would appear to breach their regulation 13.6.2 (Bolton Wanderers, Barnet and Forest Green Rovers), would the Football League really block a move to a site e.g. 7.5 miles from the centre of Oxford if that was all that was possible?

In addition, the Alternative Sites Report is based on a set of criteria developed by a planning inspector when analysing Brighton and Hove Albion's relocation. However, as Brighton does not have a green belt, it is not clear to me that these same criteria should be used in the context of Oxford. Specifically, a set of criteria that explicitly references the green belt could have been employed.

### **Delay until Independent Football Regulator is established**

The government recently introduced the Football Governance Bill, as this enjoys bipartisan support it is likely to pass into law before the end of this parliamentary session and therefore prior to Oxford United relocating. Section 48 of the draft bill requires the newly created Independent Football Regulator to approve all club relocations. Assuming this passes into law, Oxford United will have to gain this approval to relocate to the proposed stadium. The criteria in the draft legislation differ from those used by the Football League, but require interpretation by the IFR. Critically, the IFR may choose to allow more or less freedom to clubs looking to relocate. If less freedom is afforded, relocating to the proposed stadium may not be permitted. Conversely, if more freedom is allowed, it may be possible to move to a site that does not impact the green belt.

Therefore, a final decision on this application should be delayed until the situation with regards to the IFR becomes clearer: either until it is established and can advise on what relocations it would permit or until it becomes clear that the Football Governance bill will not pass.

### **Oversized stadium**

At 24.6 m tall the north stand of the proposed stadium will be the tallest building in the local area by some distance and therefore will be significantly out of character. This is only exacerbated by the design decision to place the tallest stand on the exposed northern side of the stadium, where it will intrude into the public space around Kidlington roundabout and north up Oxford Road. However, this height is simply not necessary for a stadium with a capacity of 16,000 – Leicester City's King Power stadium, which at 32,262 has more than double the capacity, is a similar height.

### **Issues With Traffic Modelling**

The full VISSIM based traffic modelling is not yet available, and so I will await that before making detailed comments. However, the VISSIM Model Scoping raises the question as to whether the impact of removing the south bound bus lane on bus journey times (particularly in the AM peak) will be modelled?