OUFC Planning Application Ref: 24/00539/F

Proposed Transport Strategy

From: Friends of Stratfield Brake (FoSB)

FoSB is a community action group formed in early 2022 in response to Oxford United's proposal to build a football stadium, as part of a much larger scheme, on Stratfield Brake Sports Ground, a Green Belt site in Kidlington. The original proposal covered both Stratfield Brake and an adjacent Green Belt site, known as 'the Triangle'. The project has evolved and the focus has now centred solely on the Triangle. FoSB, along with its supporter base of around 600 people, is opposed to this proposal and actively campaigns against it. For more information, see:

https://www.friendsofstratfieldbrake.org/

This is an <u>objection</u> to the applicant's proposed transport strategy. Transport is a key area of concern for us.

Road closures

Para 6.3.1 of the Transport Assessment states: "It is expected that traffic management will be required for safety reasons. Traffic will be diverted via Frieze Way (a dual carriageway) for at least 30 minutes to enable the supporters to safety arrive and leave the stadium via Oxford Road to reach the transport interchange at Oxford Parkway."

We make the following comments:

- In April 2023, Tim Wiliams, the CEO of OUFC stated in an address to Oxfordshire County Councillors by way of a video¹ that 'a new footbridge will be constructed from Oxford Parkway Station and the Park & Ride enabling safe crossing over the A34 directly into the site'.
- Oxfordshire County Council (OCC) wrote to Tim Wiliams on 12 October 2023². In that letter the cabinet made it clear that disruption to the Oxford Road would not be permitted.
- We are surprised therefore that OUFC has chosen to progress a planning application which relies on road closures of the main route between Kidlington and Oxford as its traffic management solution.
- Regular road closures, both on Saturdays and in the evening rush hour period will effectively cut off residents of Kidlington and villages to the north from accessing Oxford, and prevent residents in North Oxford accessing services and facilities in Kidlington.
- This will result in significant amenity loss for the local community, as well as entail far-reaching impacts on the road network.

¹ https://www.youtube.com/watch?v=4iggOk-vzDo&list=PPSV (at 06:54).

² Letter to OUFC dated 12 October 2023 from Cllr Dan Levy & Cllr Calum Miller: https://news.oxfordshire.gov.uk/oxfordshire-county-council-sets-out-its-requirements-for-oxford-uniteds-new-stadium/

- OUFC has known since October 2023 that OCC's cabinet will not proceed with a lease agreement on this basis.
- OCC's decision not to allow road closures was reinforced by the leader of the council, Cllr Liz Leffman, in her email dated 12 April 2023 to the four parish councils of Kidlington, Gosford & Water Eaton, Yarnton and Begbroke in which she wrote: "we will not support any proposal that includes the closure of the road on match days".
- We note that traffic modelling using the VISSIM model is still in progress and that this will be the subject of further consultation when the results are available.
- The traffic modelling must take account of the substantial development already committed in the area, both commercial and residential. It should also take account of the planned closure of Sandy Lane.
- Road closures are planned for 'at least 30 minutes'. We note that the applicant's planning exhibition materials stated that 'Oxford Road will be closed to traffic for an hour before a match and up to two hours afterwards' so we query how credible and adequate these durations are. To the extent that the ground has not emptied within this timeframe, volumes of crowds still in the process of dispersing will endanger other road users and/or cause unplanned traffic issues with the actual (open-ended) length of closure causing even more disruption to the local and strategic highways.
- The Design Review Panel's Summary of Recommendations includes "Concerns about the proposed main entrance handling large crowds & level differences from the highway". Factors such as this, resulting from over-development of this small site are likely to slow fan movement down and lead to longer road closures.
- The applicant's plans include measures to attract fans to the games earlier, and also to stay later, to enjoy the fan zone etc. This could mean the flow of fans is reduced and more prolonged resulting in longer road closures and/or disruption to traffic flow as fans repeatedly use the pedestrian crossings over the Oxford Road.
- The County Council is bound both by the Statutory Enhanced Partnership and by the conditions attached to DfT grant funding under the ZEBRA competition to support the replacement of the entire bus fleet operating wholly within the City of Oxford and its immediate surroundings, to secure, at a minimum, a 10% improvement of average bus journey times. Some of the measures taken to date by OCC have diminished bus reliability and journey time. Allowing the Oxford Road to be closed and traffic diverted, will lead to further delays and would certainly not help to achieve the required 10% improvement.
- The bus lane southbound from the Kidlington Roundabout to Oxford Parkway
 has been removed in the stadium plans. This is another anti-bus measure that
 will lead to delays for buses and therefore passengers. People who use public
 transport to commute using this route should not be disadvantaged by the
 removal of a bus lane.
- OCC's comments state that "bus stops and waiting areas must be provided on Frieze Way for the diverted buses, due to the number of buses using the Oxford Road corridor plus the match day services/Park & Ride shuttles, these will need to include shelters and RTI displays". We are unclear where these covered bus

stops would be located (without impinging further on the hedgerow and therefore further adversely affecting biodiversity) and how they could be used without disrupting Frieze Way which is part of the diversion route and will already be taking more traffic as a result.

- Frieze Way would be one of two main entrances into the stadium site. It is
 difficult to envisage a scenario where this many (thousands of) fans can be
 safely delivered without affecting the traffic flow along Frieze Way which will
 already be operating at a much higher capacity because it forms part of the
 diversion route.
- The proposed Toucan crossing on Frieze Way can also be expected to be in substantial demand for people accessing the stadium from Kidlington. This would also have an adverse impact on traffic flows. Similar comments apply to the Toucan crossing on the Oxford Road.
- The diversion route for traffic includes the Peartree, Wolvercote and Cutteslowe roundabouts. Local people know that these are already extremely busy particularly on Saturdays and in the rush hour. They would also be impacted by additional stadium traffic travelling from the north and the west to access the Park and Rides.
- 'Rat runs' through residential areas would be an inevitable consequence of the diversions. We anticipate these would include:
 - Five Mile Drive in North Oxford (already busy on Saturdays when Summertown Stars use it for training).
 - Islip village as residents in Kidlington and surrounding areas exit via Bicester Road in Kidlington to avoid the A34 going south.
 - Begbroke and Yarnton as residents in Kidlington and areas to the North attempt to access the A34 south along the A44.
- Diversion / 'rat running' through residential areas will have an adverse impact on air pollution, including in areas where it is already above acceptable levels. For example, (1) Oxford City Council Air Quality Action Plan 2021-2025³ identifies Cutteslowe Roundabout as one of the four pollution hotspots in Oxford; and (2) Cherwell has identified the Bicester Road in Kidlington as an Air Quality Management Area⁴.
- Road closures will make accessing facilities at Oxford Parkway Station and the Oxford Parkway Park & Ride (particularly from the north) difficult. This is inconsistent with OCC's travel strategy of encouraging use of public transport.
- We question the use of Park & Rides as a 'sustainable travel' option and believe
 they will just be used as stadium car parks encouraging fans to cover most of
 their journey by car. Using a bus to travel the last part of a journey does not
 mean that the journey was made via public transport.
- The Park & Ride facilities are community facilities supported by revenue from council taxpayers to enable visitors to access local hospitals more easily and Oxford City Centre. It is unacceptable to allow these facilities to become the *de* facto car parks for Oxford United, with resulting commercial revenue benefiting the private individuals who own OUFC rather than the community.

³ https://www.oxford.gov.uk/air-quality-management/air-quality-action-plan

⁴ https://www.cherwell.gov.uk/info/69/pollution/463/air-quality

- Use of the Park & Rides will increase as OCC implements further travel
 measures such as traffic filters/bus gates, ZEZs, workplace parking levy and
 further LTNs. In addition, substantial committed development is planned nearby
 and further afield, all of which can be expected to lead to increased use of the
 Park & Rides. We have concerns about scenarios where the Park & Rides are full
 of fans' cars to the detriment of other users, for whom the Park & Rides were
 built.
- Park & Rides being taken over by football fans thereby preventing their use by people wishing to access the city centre will also be to the detriment of the already beleaguered Oxford City traders.
- We have not seen measures which will effectively prevent the use of the Oxford Parkway Station car park being used despite Chiltern Railways' statement that its car park will not be available to fans.
- The 3m pathway plus .5m buffer zone on Frieze Way (as required by OCC) would appear to mean further loss of vegetation and biodiversity and will affect the BNG metric.

Modes of travel

- The transport assessment states: "The transport strategy has therefore been developed to enable at least 90% of supporters to travel to stadium by non-car modes, including walking, cycling, wheeling, bus, coach, Park & Ride and rail". However, OUFC's plans to achieve this modal shift are weak and how effective they are in practice remains to be seen. As over 80% of OUFC fans currently travel by car this would require a substantial shift in travel mode, made more unlikely by the lack of direct buses from east Oxford where much of the fan base resides. The likelihood of success is therefore low and we would describe the modal shift as an aspiration rather than as a plan.
- The ability of OUFC to influence the travel patterns of away fans visiting Oxford is particularly remote.

Strategic Road Network

- As local residents, we know that the road network in the area of the stadium is already fragile. It only takes one small incident to create very substantial tailbacks. As set out in the Appendix 1, by way of example:
 - On 15 October 2023, the road closures during the Oxford Half Marathon were exacerbated by a traffic incident near Kidlington, leading to widespread disruption for many hours preventing buses from running and impacting emergency services vehicles.
 - On 23 March 2024, shoppers were trapped in Sainsbury's car park at the Kidlington Roundabout due to gridlocked traffic.
- The potential for the proposed stadium to adversely impact the A34 is obvious.
- The diversion route would also impact on the A40, part of the Oxford Ring Road which is heavily used by through traffic including heavy vehicles. The A40 is not maintained by National Highways but by OCC. As Highways Authority, OCC should be aware of the likely adverse effect of the planned diversions on traffic congestion and potential effects on the A40 and wider Ring Road.

Controlled Parking Zones (CPZs) and other public parking locations

- Controlled Parking Zones (CPZs) are apparently planned in a radius of up to 2km from the stadium. However, CPZs should not simply be inflicted on communities: engagement is required to determine local views and ensure appropriate outcomes for those affected.
- The application lacks detail in this respect. For example, how the CPZs will operate. Will they be permanent? Or just on matchdays (in which case how will they be enforced)? Much more detail is required, in order to undertake a proper consultation exercise.
- Antisocial parking is a common feature at the Kassam Stadium on match days, and this is a venue with significantly more parking provision than at the applicant's proposed site. As set out in Appendix 2, during a match on 7 May 2023 at the Kassam Stadium, vehicles on nearby roads look like they have been abandoned on grass verges and are blocking pavements with little thought for the local area, nor disabled pavement users or parents with pushchairs and young children. The proposed site, in proximity to residential areas, is unsuitable for a development of this nature as demonstrated by current fan behaviour in this respect.
- The applicant has not explained what measure would be introduced to prevent this antisocial behaviour being replicated in Kidlington.
- Cars in Appendix 2 are also parked on double-yellow lines. What will be done to prevent a parking fine being seen as a cheap parking option (when split between the car's occupants)?
- What measures are planned to prevent parking in public car parks such as the two car parks in Cutteslowe Park, Stratfield Brake Sports Ground, Kidlington Leisure Centre and Exeter Close in Kidlington?
- Stratfield Brake Sports Ground car park is heavily used by parents from home and away teams bringing young people to sports matches – there is no other obvious alternative. How will this facility be protected when the limited provision at the stadium/hotel site is exhausted by vistors? Parking at Stratfield Brake will be an obvious close (and free) alternative, particularly as the applicants appears to have included part of the entrance to Stratfield Brake Sports Ground as part of the application and proposes a pedestrian crossing point here.
- The development of PR6a/Water Eaton includes a footpath/cycle route to Oxford Parkway which will make parking in Cutteslowe Park an attractive and cheap option.
- To the extent that community facilities are repurposed in this way as 'unofficial' stadium/hotel carparks, this will result in a significant loss of amenity for local residents.

Segregation of home and away fans

• The restricted nature of the site and the constraints related to access points would make fan segregation very difficult if not impossible.

- Antisocial behaviour by OUFC fans is an issue with a reported increase in the Oxford Mail on 19 April 2024⁵: "Oxford United have reported a "slight increase" in anti-social behaviour in recent home games as the club's play-off chasing season nears its conclusion. The club said the use of discriminatory and offensive language has been more noticeable at recent games at Kassam Stadium while fans have also been caught with pyrotechnics. A statement from the club warned told fans they have a "zero-tolerance approach" to anti-social behaviour and will be "proactive" with sanctions."
- Antisocial behaviour is more likely to lead to problems if fans are closely packed as they enter/exit the proposed stadium.
- All local engagement exercises to date, including the Kidlington Parish Poll, have demonstrated that the majority of local opinion does not welcome Oxford United's new stadium in Kidlington.

Evacuation in the event of an emergency

 Plans for an emergency evacuation would have to include allowing fans to spill out onto the roads. With limited circulatory space around the stadium this would appear unavoidable. How would this be managed to avoid unplanned road closures? And how would unimpeded access by emergency services be guaranteed?

Footbridge

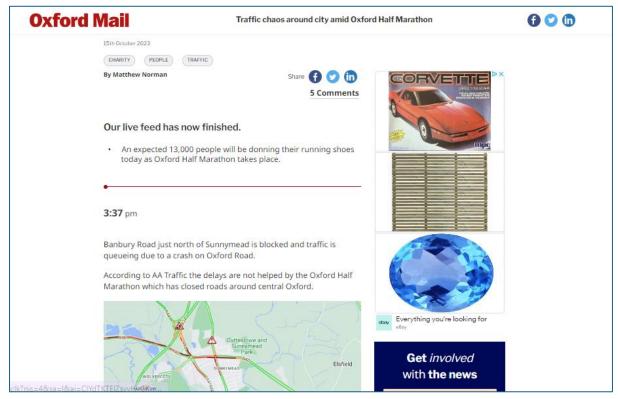
- When OCC consulted on the stadium a 'potential footbridge' formed part of the
 proposal. Road closures were not mentioned. Shortly after OCC agreed the
 lease in principle, OUFC held an exhibition which revealed plans without a
 footbridge and where the transport strategy revolved around road closures. The
 OCC consultation was therefore flawed and the actions of the applicant were
 misleading and disingenuous.
- A statement dated 6 March 2024 on OUFC's website states: "Once the preapplication process has been concluded the intention will be to submit a planning application for the bridge so this can be considered alongside the application for the stadium. On this basis the aim is to submit the application for the bridge in late spring/early summer of this year [2024]." As OCC has said that the Oxford Road cannot be disrupted and this presumably means it cannot be closed, the footbridge is vital for ensuring the safety of fans. This planning application should not be determined until plans for a footbridge have been submitted and agreed.
- If this planning application was to be approved this should be <u>conditional</u> on a footbridge being built in an appropriate location.

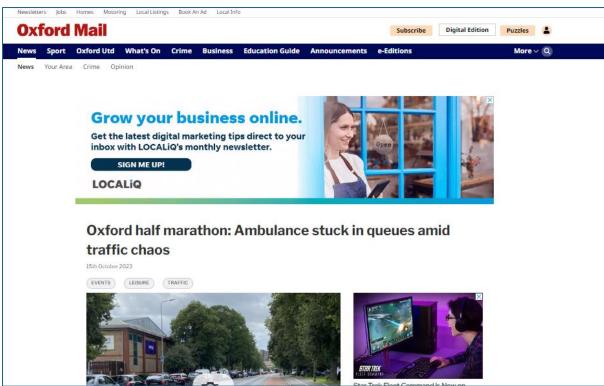
APPENDICES 1 & 2 FOLLOW

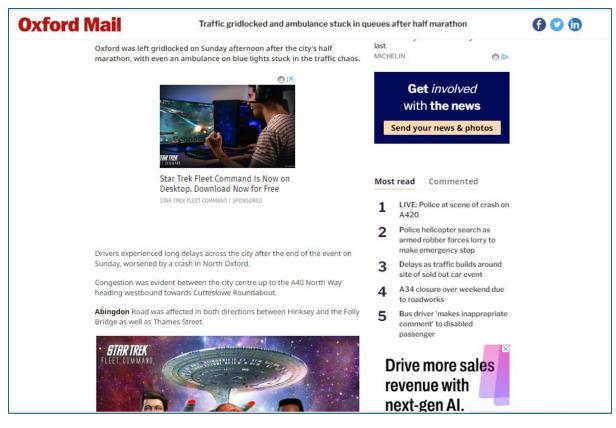
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⁵ https://www.oxfordmail.co.uk/news/24265124.oxford-united-report-increase-anti-social-behaviour/

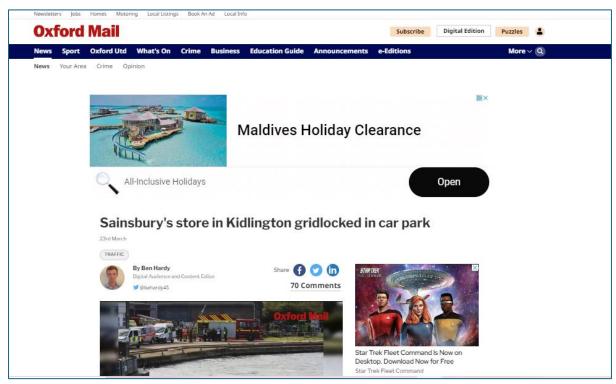
Appendix 1











Customers shopping at a supermarket this lunchtime found themselves gridlocked for nearly an hour.



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Motorists were stuck in the car park of the Sainsbury's store in Kidlington with eyewitness telling the *Oxford Mail* people were getting increasingly annoyed.

Sainsbury's has apologised for the disruption and cited the nearby roadworks taking place on the A34 on the edge of Oxford for causing the issues.

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The A34 is closed between the Peartree and South Hinksey interchanges while gas company SGN is on site.

This has led to severe delays on the surrounding network including in Kidlington.

One customer, who did not wish to be named, said he feared there would be an accident near the Sainsbury's store as a result of the delays.



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"Customers are all out of their cars getting more and more annoyed.

"Cars can't get in via the entrance as cars are trying to leave that way. It is

The shopper later added that he had been queuing to get out of the entrance on Bicester Road which was also gridlocked at around 1pm.



A spokeswoman for Sainsbury's said: "Our Kidlington store car park is experiencing some delays due to roadworks in the area.

"We are sorry for any inconvenience this may cause."







Appendix 2







