## Planning Application 24/00539/F

I object to this application, which should be rejected on at least the following grounds:

## 1. Destruction of green belt

There are no very special circumstances that would justify removing this land from the green belt. The claimed special circumstances in the Planning Statement are completely spurious and should be given no weight whatsoever. Specifically

9.44 states correctly that OUFC will have no legal right to use Kassam stadium. However, it is clear that they could, if they chose, negotiate further use of the existing stadium, so the statement "As such, there is an urgent need to develop a new stadium" is untrue.

9.45 states that "there will be benefits to the Club associated with the financial sustainability of owning their own stadium". This may very well be true, but financial benefit to a commercial organisation is in no way a very special circumstance. The same argument renders 9.46-9.48 utterly irrelevant.

Sections 9.49 to 9.59, claiming that there are no alternative sites, are also dishonest: the triangle itself would have been discounted by the initial survey as being too small, and the second survey was not a serious attempt to find any alternative but a feeble attempt to justify a foregone conclusion.

All the "further benefits" discussed are predicated on the same false claim that there is no alternative; in fact many of the benefits (such as employment) would be far more valuable to the community around the Kassam stadium then to the triangle which is in an area where huge numbers of jobs are already being created by developments like Oxford North.

Not only is the destruction of green belt contrary to national policy, it is directly contrary to local policy which explicitly states that the triangle must be retained, in the face of the loss of green belt all around it, as the only remaining green gap between Kidlington and Oxford. The claim that tiny green space to the North of the stadium (precisely the size of a fig leaf) constitutes such a gap is simply insulting and should be treated with the contempt it deserves.

In summary OUFC is forced to admit that the site would seriously damage the green belt – although it tries to minimise even this blindingly obvious conclusion - and presents no credible evidence for any very special circumstances.

## 2. Transport impact

Like the claim of very special circumstances, OUFC's transport proposals are completely unsustainable. If the application is accepted, match days will bring the whole area to a standstill. From a transport point of view the site is far worse than Kassam stadium.

- 1. Their original claim was that they would build a bridge over Oxford Road, and OCC made clear that there was no question of allowing road closures to accommodate fans. Now the application proposes to close Oxford Road for indefinite periods on match days. This in itself should be enough to reject the application outright. Oxford Road is a major transport artery, not just for private cars but for public transport by bus and rail. Closing it would cause massive inconvenience to a large area and will not be countenanced by OCC. In view of this the claims in ES1 Chapter 10 of negligible effects are manifestly fatuous.
- 2. Paras 9.89 on about "Sustainable Transport Benefits" are similarly pie in the sky. "The Club has an aim that 90% of fans will travel to the Stadium by sustainable modes of travel" is completely meaningless: there are no concrete plans bring this about and zero evidence that it is attainable. In fact fans will continue to travel by car and OUFC is providing nowhere for them to park, with the result that fans will be parking all over the local area.
- 3. The application talks about using shuttle buses, but again there is no provision for these within the grounds, so they will clog up the local roads.

## 3. Loss of biodiversity

As the detailed analysis in the OCC response demonstrates, the claim of a 10% increase in biodiversity is also unsustainable. It is based on underestimating the current biodiversity of the site and ignoring the effect of human intrusion on future biodiversity. In fact, common sense suggests and

the detailed analysis proves, there will be a massive loss of biodiversity by building over the site that will not be compensated for by tiny isolated green areas and a few planters.