

Campaigning to protect our rural county

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Planning Dept Cherwell District Council Via online planning portal CPRE Oxfordshire 20 High Street Watlington Oxfordshire OX49 5PY

Tel: 01491 612079
campaign@cpreoxon.org.uk
cpreoxon.org.uk

Dear Sirs,

The Triangle, Oxford Road, Kidlington OUFC Planning application 24/00539/F

CPRE Oxfordshire is concerned that the removal of this greenfield site from the Green Belt, within an area that is already under huge strain from neighbouring development on former Green Belt land, will mean that Kidlington will effectively merge with Oxford and just become a suburb of the City thereby losing its separate identity. Increased traffic and associated CO2 emissions will have a significant impact on the local environment. The proposal seems particularly absurd as OUFC already have a modern stadium in Oxford.

In preparing our response we have seen, and support, the responses prepared by Friends of Stratfield Brake in relation to the issues of Green Belt and Ecology/ Biodiversity net gain.

Green Belt

Paras 152 and 153 of the National Planning Policy Framework make it clear that development in the Green Belt should only take place under 'very special circumstances' with 'substantial weight' given to any harm to the Green Belt.

The Triangle site is in the Green Belt and is used for willow coppicing. It is neither derelict nor unsightly and it forms part of the last "Green Barrier" separating Oxford from Kidlington. It performs two of the main purposes of land in the Green Belt which is to prevent urban sprawl and prevent settlements coalescing. The land was originally acquired by OCC specifically for that purpose, so a need for this barrier is already well established.

The area of land concerned was included and redesignated in the recent Cherwell Local Plan Partial Review as "Green Belt" although the long-term plans of OUFC to move to a new site were already well known at the time the Plan was being compiled. The Vision statement in the Plan states:

"In 2031, Kidlington is a distinctive and sustainable community with a strong sense of identity".



In Section 5, it also describes the Green Belt as important in the context of the overall Plan. Policy ESD14 states that the changes to the Green Belt put forward in the Plan are designed to "ensure that the revised Green Belt boundaries are capable of permanently enduring beyond the plan period" ie that no further changes should be required.

Ecology

The Ecology/ Net Biodiversity Response prepared by Friends of Stratfield Brake (FoSB) details the issues relating to the site and areas adjacent to it. Stratfield Brake is one of the most important areas of ancient woodland in the County which is why the Woodland Trust acquired it so as to provide adequate protection. A huge stadium with intrusive lighting, noise and large gatherings of people would clearly impact on the reserve which is a fragile environment. The absence of sufficient parking on site would very likely lead to parking on roads adjacent to the reserve and potentially in the two car parks on the opposite side of Frieze Way.

The site is a small site for such a large development and it is obvious that, if the development were allowed here, the temptation would always be to use the neighbouring Stratfield Brake area of sports fields to provide car parking and refreshment facilities. If, despite the evidence, the Council is minded to grant permission to this application, consideration should be given to including a condition specifically constraining the development from expansion onto the Stratfield Brake site.

Nature of development

Although the provision of a new stadium forms part of the development, the part which apparently will fund the stadium is a medium sized new hotel. This is thus a proposal to build a new hotel which will include the benefit of a new stadium for OUFC. The fact is that Oxford already has plenty of hotels, many of which are new and more which are being built. There is no very special circumstance to demonstrate the need for building a new hotel on this site in Oxford. We agree with the response provided by FoSB on the issue of the Green Belt which goes into the issues in considerably more detail.

Cherwell District Council has declared a climate emergency, committing to ensure its own operations and activities are carbon net zero by 2030 and that it will do its part to support the district to become carbon net zero. The fact that this proposed development will involve the demolition of one suitable facility so that it can be replaced with a similar structure 5 miles away will be a huge waste of natural resources at a time when we should be conserving these.

The fact also is that the Triangle site is located "out of town" and those visiting the proposed new site will for the most part need to travel further either by car or use additional public transport all of which will further increase the carbon footprint of the proposed stadium. Many who formerly would have been able to walk to the Kassam stadium would have to travel to the proposed new stadium by either car or bus. It should also form part of the decision-making process that the stadium if built will be primarily for a



professional football club and the number of times it will be used fully for its intended purpose will only be in region of 100 hours a year.

We have yet to see any convincing evidence that compensatory measures will address these problems in anything other than a superficial way.

Traffic Plans

The application is deficient in that no detailed Travel Plan/traffic and crowd management details have been provided. The limited information provided by OUFC so far is probably overly optimistic as to the numbers of people who will use public transport to visit the Triangle and, for example, do not take into account the lack of any buses that run directly to the site from the more populous parts of Oxford, such as Blackbird Leys near where the Kassam stadium is located. The likely travel plans of away supporters coming from other parts of the Country who for the most part travel by either coach or bus has not really been considered as OUFC have no control over how these fans travel. The build-up of traffic at peak times for matches, mostly played on Saturday afternoons, coincides with those times when the existing parking facilities, currently used for park and ride and as station parking, are already heavily used. The relevant traffic modelling data must be provided before this application can be properly considered.

Brownfield sites within the City

Appropriate consideration of alternative locations is an essential part of establishing the very special circumstances required to justify any loss of Green Belt land.

In their attempts to acquire the Triangle, the owners of OUFC have commissioned a report from Savills which attempts to rule out any other sites within the Oxford area as being suitable. One of the main criteria Savills has used in their review is that any alternative site must be within walking distance of a railway station. This is not a requirement of the EFL and ignores the fact that travel to the proposed stadium for almost all home fans will not be undertaken by rail. We question the assumptions in the report and would suggest there are potential alternatives that could merit further exploration, such as the Unipart site (30.63 HA) which is a much larger brownfield site which has been empty/ underused for at least the past 30 years and is ripe for redevelopment.

In summary, the Triangle is not a site which is suitable for the sort of development proposed and the applicant has not demonstrated the very special circumstances required to justify the loss of Green Belt land and the additional harms that would be caused. We urge the Council to refuse this application.

Yours faithfully

Helen Marshall CPRE Oxfordshire