

Re: OUFC Planning Application Ref: 24/00539/F

Objection from

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Introduction

A year ago, 2,073 residents in Kidlington Parish alone rejected a stadium in the village in a poll run by Cherwell District Council. I'm an experienced local ecologist who has lived in Kidlington since 1984 and I know all the local habitats very well.

This is an outline objection, **I may submit a more detailed discussion of all these issues in a second version of this objection.** My reasons are as follows:

1. Green belt preservation. This site is in Green Belt and not in the Local Plan. This area was bought in 1937 by the County Council specifically to ensure the green gap between Kidlington and Oxford. I want to see this green gap preserved.

2. No 'exceptional circumstances' to put the Stadium on this green belt Triangle site which is also full of biodiversity. The club could stay at the Kassam by re-negotiation. Sustainable transport is coming to the Kassam with railway line extension there. Dedicated parking there.

3. The Carbon cost of re-build a new Stadium is intolerable. A when perfectly good, usable for many years, stadium building already exists. Construction produces a large proportion of CO2 emissions and exacerbates Climate Change. A Climate Emergency is declared by Cherwell District council. Net Zero commitments mean no unnecessary construction.

4. The site is too small and constrained, not having enough parking and crucially no space for emergency escape for 16000 people plus those in hotel in case of fire or similar, unsafe.

5. Transport Issues - Fan car Parking. The club's own analysis indicates most local fans travel to matches by car, seems unlikely this will change much. No dedicated parking at Triangle site for fans cars as at the Kassam. Future parking chaos disadvantaging me and all my family can be foreseen of cars overloading local park and rides, Oxford Parkway Station Park, Sainsbury's car park, Stratfield brake sports parking and in **all local streets in south Kidlington and North Oxford**. Parking on verges and blocking driveways feared. Already on a Saturday when there is a Kidlington All Blacks match on, there is not enough car parking at the Stratfield brake sports area and cars are parked out on verges. What when this coincides with an OUFC match in the Triangle?

6. Transport Issues. Congestion on the whole road network leading to gridlock for commuters in rush hour. I go on the bus from mid-Kidlington to town and I also drive in a car along Oxford

Road (main arterial road) to the eastern ring road, already I'm suffering regular delay and long journey times in the car, current network at or over capacity. The proposals given of match day closures and diversions and in particular permanently **extinguishing of the bus lane on the A4165 from roundabout to near Oxford Park way station will be intolerable**. Buses will be delayed as well as cars. The extra traffic losing the bus lane will generate on this arterial route towards the city will be dreadful even before we get the commuters from the 4,400 houses that are already planned all around Kidlington, plus commuters coming into the employment sites in Oxford North currently being built. Traffic chaos/gridlock will be the future every weekday for us commuters, goes against all sustainable transport plans. What about emergency vehicles like ambulances and fire engines (leaving from Kidlington base) trying to get through all this. What about trying to get to appointments in the hospitals in the city?

7. Transport/Biodiversity loss issues - Foot/cycle path and lighting to be needed on Frieze Way

It is proposed that a path and street-lighting will be extended all the way on the east side to the end of the Frieze Way dual carriageway to the Loop Farm Roundabout. Oxfordshire County Council's Highways Officer. requires a 3m wide combined path plus 50cm buffer on the East Frieze Way verge and bus lay-bys. **At narrowest, for a long section, the verge is only 4.50m -5.0m wide before you are into a deep ditch** (I've measured it). Not enough room for a 3m path in the narrow sections (plus the necessary highway trench drain) without destruction of **all** biodiverse scrub and numerous trees, especially as the road goes through Stratfield Brake Ancient woodland District Wildlife Site. The scrub includes Blackthorn which may host priority species Brown Hairstreak butterfly and the Elms may host priority species White-letter Hairstreak Butterfly.(because both are recorded nearby), Mature trees potentially lost include at least 3 examples of old coppice stools of oaks (multiple trunks from one base) which are part of the Ancient Woodland.. These are now part of the verge bank and each coppice stool was protected from earth damage during Frieze way construction by building a low circular retaining stone wall around the base of each. All old trees have survived road construction so far but now these plans threaten their continued existence. Removal for a path would constitute loss of a chunk of the actual Ancient woodland irreplaceable priority habitat.

Lay-bys for buses would not be possible except in wider verge section far south of Stratfield Brake woodland nearer to Loop Farm roundabout. The result of path and lighting will be biodiversity loss by destruction of the beneficial dark zone in Stratfield Brake Ancient woodland (**both East and West** sections) on either side of Frieze Way) by lighting and noise; likely driving the 9 species of bats recorded by Ecology Solutions away and killing their food source moths. All this wildlife habitat/biodiversity loss indirectly attributable to the application is not accounted for in any of the Biodiversity Net Gain calculations.. Re calculation of the baseline including estimates of losses on Frieze Way needs to be carried out.

8. Biodiversity Loss Issues – Triangle

I know the site very well. As an expert ecologist who has lived in Kidlington a long time and the author of two Biodiversity Reports on the Triangle already for Friends of Stratfield Brake, I find the loss of the vast array of plant and species I have already documented in the Triangle mixed scrub, grassy flowery rides and diverse 18year old willow coppice completely unacceptable (see my reports on website of FoSB). This wildlife richness has developed due to the heavy waterlogged soil, easy colonisation by plants from rich hedges/woodland around plus rotational willow coppice management and lack of general public access for many years. We need to stop destroying such green biodiverse sites if we are to recover nature that is in serious decline. Biodiversity is the richness of all types of living things, yet the Biodiversity Net Gain Metric **assesses only plant habitat**, ignoring all the insects, fungi, birds, bats, amphibians, deer etc. I have found on site (even the protected Harvest Mouse, a nest of which was found only a couple of weeks ago). The claims of **10% Biodiversity Net**

Gain with this development is unbelievable and in particular I think there are errors in habitat mapping and habitat classification in the baseline assessment by the firm Ecology Solutions. Briefly:

- What is mapped as ‘**hedge with trees**’ H2 to Oxford Road on Ecology Solution’s habitat map is in some areas far too wide for hedge (([UKHab v2.01](#) defines a hedge max 5m wide, a significant length of H2 is between 5 and about 15 metres) and those areas should be mapped and valued as ‘mixed scrub’ instead.
- The willow coppice occupying most of the centre of the site is diverse, up to 5yrs old and on 18 year old coppice stools so **should not be classed as Arable** (‘Cropland - Non-cereal crops’ -of no value in the metric) but should be better classed as ‘Willow scrub’ (of considerable wildlife value). BNG guidance showing that professional discretion can be exercised in cases like this, such discretion has not been applied, why?
- Including the Stadium chemically-treated, close-mown and trampled pitch with in the grassland habitat ‘gains’ in the metric after development (destroying rich willow coppice) is bending the metric rules really too far. The pitch will provide nothing for wildlife. Recalculation of gains should remove pitch area grassland.
- All the compensatory habitat gain proposals for the northern area of the Triangle including a pond are **completely unrealistic** due to the high public pressure the area will suffer of 1000s of fans milling around there before and after matches, no wildflower meadow or pond will survive this, neither will bats be able to hunt there as claimed.
- The loss (to construct Stadium access) of **three mature oak trees** (one of trunk diameter 72cm) within this scrub adjacent to Oxford Road (some with TPOs) is reprehensible, there would be huge biodiversity loss of insects with death of these trees that cannot be compensated for by planting 100s of very young trees.
- Justification for any of the decisions made in the Biodiversity Net Gain Metric tables are not supplied although this was clearly requested at the Scoping Opinion stage.
- There is **no management plan** included in the Biodiversity Net Gain report so it could be seen how the suggested gains in ecological outcome are achievable and will survive in the long term - survival for a future 30years must be demonstrated.

Additionally the proposed ‘**green roof**’ suggested on part of the Stadium is actually according to detailed plans actually be a ‘**brown roof**’ where a surface will be provided for plants with windblown seeds to naturally colonise. Such a dry roof plant assemblage will not compensate for loss of the rich wetland plant assemblage currently in the Triangle centre. I can’t see any plants that are not stonecrops on a dry roof surviving 40 °C summers coming soon. Nor will a green wall compensate for loss of wet grassland plants.

There is no recognition of the how beneficial the current rotational sustainable willow coppice management is to biodiversity in creating a mosaic of habitats and environmental conditions. All of the site will likely be scraped clean before development. Suggestions by Ecology Solutions that rare and scarce plants I have found under willow coppice like the orchids, Corn Mint and Narrow-leaved Bird’s-foot Trefoil be dug up and relocated to BNG mitigation northern area are unviable. Some of these require wetter soil and none will survive public access trampling.

There is no recognition of the interdependence of the Triangle wildlife with the wildlife of the Ancient Woodland strip to the south. For example deadwood breeding beetles from the woodland are visiting flowers in the Triangle and 9 species of bats are recorded on site including rare Barbastelles,

likely roosting in the woodland and hunting over the Triangle; this will cease with development. With all the scrub present, bird surveys are important. I'm not a bird expert but I recognise that the Ecology Solutions breeding bird surveys are inadequate, being carried out in June rather than the recommended peak time of April-May. Please read my reports for full details of my findings. Metric re-calculation addressing all these issues will likely come up with a considerable Biodiversity Loss in the metric for this site. If the 10% gain target cannot be met, why should this development proceed?

9. Biodiversity Loss Issues – Stratfield Brake East Ancient Woodland

This is the woodland strip to the south of the Triangle which is part of the Stratfield Brake Cherwell District Wildlife Site and is a small fragment of Ancient Woodland (this old woodland was cut in two by Frieze Way). I am the author of two biodiversity reports on this woodland for Friends of Stratfield Brake (please read these reports on their website). You don't have to damage ancient woodland by building on it, damage can occur by building right next to it as here proposed.

These plans show zero buffer to development (due to the very constrained site that is just too small) As likely ancient it needs at least the **50m no development buffer** recommended by the Woodland Trust (the attenuation ponds and hedge are insufficient buffers) and in my opinion there will be a very high risk of damage to this Irreplaceable Habitat from too much public access (trampling, fire sites, litter) lighting (a current dark zone driving away sensitive species like bats and killing moths attracted to lights) plus there is a big risk of adverse hydrological change to the lowest section of the wood nearest Frieze Way (see below).

Reports from the firm Ecology Solutions ignore the importance of this woodland to the south saying it is not 'Ancient Woodland' mainly because it does not appear on a pre-1600map. It is clearly on an 1833 map. Ecology Solutions quote it is not on an Enclosure map of 1818 as evidence it was not there then and is not ancient. However I have found evidence (in the [Ancient Woodland Inventory Handbook](#)) that **woods were not always mapped on Enclosure Maps, so this does not provide good evidence one way or the other.**

All my surveys indicate it is ancient (see my biodiversity report on this wood). Currently it is awash with sheets of 1000s of flowering native Bluebells and in total has **19 plant species that are Ancient Woodland Vascular Plant indicator species (17 in my report, but two more recently seen) plus I have recorded 147 species of fungi.** So it is very likely ancient even though lack of map evidence will cause it to be mapped only as 'Long Established Woodland' By Natural England. . Already without a stadium and 16,000 fans milling around the woodland has been subject to two fire sites and a rough sleeper camp. The entire deadwood with insect and fungal biodiversity is therefore at severe future risk of fire. Noise and light pollution from Stadium and hotel will frighten away the 9 Bat species recorded by Ecology Solutions and my own surveying. This will add to the negative lighting effects of the installation of street lighting all along the east side of Frieze Way (discussed above). Cumulative effects on the woodland in my view would be severe.

10. Hydrology, Drainage and necessary Land-raising

The Triangle site contains very wet heavy clay and lies in a hollow where surface rainwater accumulates. Roads on two sides travel on raised embankments and shed some water into the Triangle. I have documented the extensive flooding on site at least the last 5 months in my Biodiversity report (it has been the wettest 18months on record according to the National Hydrological monitoring programme). But this will not be the worst rainfall we have yet to experience with accelerating Climate Change. The entire flora is adapted to wet marshy conditions and the willow thrives there because it is so wet. This is therefore a very inappropriate site for development of any sort, and a good site for wildlife.

In recognition of surface water flooding risk it is proposed in application documents to carry out **ground raising by at least 0.6m (maybe more) over much of the site before building commences.**

- Does this mean the **final height of the Stadium building will be even higher** than that quoted, meaning more of an overpowering presence in the landscape?
- **Run-off will be much increased.** No water will be stored on the site surface as now and the increase in hard surfacing and the impermeable area quoted of **3.6ha** after development will shed even more water offsite because of the lack of willow and other plants with their ability to return moisture to the air by evaporation from leaves (transpiration)

The **attenuation ponds** are poorly situated next to the woodland and a hedge. Twigs and leaves will fall in and are likely to regularly clog the 'hydrobrake' system which holds back water so that run-off conforms to the 'greenfield rate' and does not increase flooding elsewhere. Should the designed SuDS system of attenuation ponds be overwhelmed by run-off water after deluge rainfall, the designed fail- safe according to application is documents is to flood the car park near the wood, with inconvenience to site users and all promises of 'greenfield rate' offsite to reduce flooding missed. This likely means also flooding of the ditch nearby **and the lowest portion of Stratfield Brake East adjacent**; with consequent risk of killing flora and some very ancient oak coppice stools (10 trunks on one, possibly 1000years old).

More to say but run out of time

J A Webb. 22.04.2024.