

General considerations

The site under consideration for this development is the last remaining vestige of an iconic green belt space at the edge of Kidlington. It forms part an area of land purchased by OCC nearly 100 years ago to specifically prevent the coalescence of Kidlington with the city of Oxford. It also represents perhaps the last vestige of untouched wild space in the area and is part of the iconic Kidlington Gap. As local authorities, both OCC and CDC have a duty to defend those areas held in trust for the local community. Any development on this site would also contravene CDC planning policy and a local plan that has only recently been updated.

There are likely to be arguments proposed around very special circumstances (VSC) as detailed in the NPPF. In paragraph 144, the NPPF explains that "When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the green belt. 'Very special circumstances' will not exist unless the potential harm to the green belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

I don't believe that any such considerations have been advanced by the applicants to support such a position. Arguments about community sports provision are insufficient in an area adjacent to existing facilities such as Stratfield Brake sports ground and the local leisure centre with a swimming pool. Economic benefits and employment benefits are of limited value in an area of effectively zero unemployment and it's also questionable if the development will provide many more additional jobs over and above those already present in the club's existing operation. It should also be noted that moving employees from the current stadium site to Kidlington is likely to substantially increase the need for commuting.

The main arguments for very special circumstances seem to focus on the club's own plight in terms of the loss of their existing facilities resulting from a long term dispute with their landlords. As a privately owned, financed and operated company, it's continued viability is not a consideration under VSC. Other benefits surround economic and community enhancements are not quantified in the application and the applicants have been very reluctant to fully detail them. Other claims about access to green belt are not relevant since access is not a requirement for green belt designation. Indeed the very nature of this site, being largely undisturbed by human activity for over 20 years is a huge advantage in terms of ecology and biodiversity.

There is already a great deal of local disquiet and distress surrounding this application with many residents making their worries known to me. Some have told me that it has had a serious impact on their mental health over the last couple of years given the persistent blight that these proposals represent.

No matter how well behaved fans are likely to be, the influx of noisy and excitable crowds is going to distress many local residents, especially those who are elderly and living alone. This highlights how unsuitable this local is given its close proximity to existing and soon to be intensely developed residential areas.

The site in itself is very small in consideration of the proposed use. The applicant's own criteria when searching for available land was that it needed a minimum of 15 acres. This site standing in the region of 11.8 acres suggests that it may not be viable in the long term and certainly not for the 250 years that the applicants hope to have a lease for. Whilst I am supportive of the club's continued existence and would be keen to help them find a new home, should that be shown to be necessary, I do not feel that this site represents the best outcome for them both in terms of the area available, the access to the site and the lack of support of the local community.

Considering the capacity of the stadium allows for crowds upwards of 16000 people, it is difficult to see how effective crowd control could be achieved in such a small space, especially as the site itself is bounded on 2 sides by major roads. The application does not fully deal with this in my opinion and there is therefore a likelihood that problems could become evident in the early stages of the operation leading to ad hoc operational imperatives being introduced. I would prefer to see a far more comprehensive and detailed plan of how the maximum capacity crowds will be dealt with without impinging on the lives of surrounding residents and road users. It should be remembered that there could be at least 2 such events per week during the main season along with other capacity events throughout the year.

Moreover this is a very large and intensive development some 25 metres in height squeezed into a largely rural and suburban environment. It would seem to be the very epitome of overdevelopment and would overshadow the gateway to Kidlington dominating the landscape for some distance. This is incongruous to the current setting and would also have an impact on surrounding vistas including sight lines into heritage sites such as Oxford Spire and Blenheim Palace.

Cumulative effects with existing future developments

There are due to be around 2000 new homes built in very close proximity to this site and we should be considering how such a development will impact on their quality of life. There are very few if any other locations where a football stadium will be so close to a heavily populated residential area.

It should also be remembered that the response to 3 local consultation exercises, including a parish poll has shown overwhelming local opposition. Indeed the parish poll returned a result showing that people rejected the proposal by 2 to 1 against.

I should point out that this may not be fully reflected in the responses to the planning application consultation. This is firstly because the football club has mobilised its fan base to swap the application with responses, as it has done during previous consultations. Secondly I have been contacted by numerous residents expressing concern about being able to make their views known on the planning portal as their names and addresses would be publicly available. There are fears of reprisals from the football fans, largely due to their aggressive stance on local social media. Whilst I don't feel that's likely to cross over to actual intimidation, many residents are not responding to the consultation because of those fears.

The amount of local resistance coupled with the compact nature of the site and the difficulties in safely access it both from the railway station and the main footpaths seems to me to make this a far from ideal location for the football club to make its home. There are very limited opportunities for further expansion on this site and if the club is successful in the future it's likely that they might need additional space, both for fans and for additional ancillary uses. There is no scope for further expansion on this site and the lack of easy access to it over two major roads (one being a dual carriageway) would seem to preclude the ability to expand the operation. In both senses, this is a bad location for such a development for the club, for existing residents and for those in the future.

The application ignores the geographical realities of the site being extremely compact and sandwiched between 2 major roads, one being the Oxford Road which separates the site from the railway station. This is a major obstacle that needs to be overcome to achieve safe access to and from the site without disruption for users of the road itself. The other road is a dual carriageway national limit road which is intended to be the main access to the site, including coach and bus access, whilst also accommodating pedestrian and cycle traffic. There are also considerations about how a full evacuation of 1600+ people could be achieved on such a small and cramped site.

Promised bridge

The applicant has promised that a bridge will be built between the railway station and the proposed stadium site, but has yet to provide any details. Such a bridge would solve most, if not all, of the access concerns but it needs to be considered as part of the overall prospect. As such I feel considering this application in isolation is inappropriate and any determination should be deferred until full details of the bridge have been presented and a planning application lodged.

These proposals are also referenced in Chiltern Railways submission to this application. This would seem like a sensible solution, but seemingly impractical given that any such bridge would have to cross the railway line, the A34 and the Oxford Road in one span. This would be even more difficult given that the Oxford Road is already elevated above the A34 and the railway line at the only point where a direct bridge would be possible. This would mean a bridge over another bridge which would be a truly gargantuan structure.

In the absence of a bridge this application focusses on shuttle buses and control crossings to deal with access problems to the site. There are few details about how long will each bus journey take to/from each site or how many people can be carried on each coach/bus. This would seem to be something that would require detailed modelling in order to confirm if it would be a viable transport mode.

We are told that a planning application for a bridge will be forthcoming. At this point it's not clear where that would be or what it would span. It would seem premature to consider this application in isolation so I would urge that any determination of this application be deferred until full details on the bridge are available. In any event I would

suggest though that any bridge should form part of a 'Grampian Condition' to be considered as vital infrastructure for the use of the site for a stadium and that no operations should be permitted on the site until a suitable bridge is constructed.

There would need to be assurances that any such bridge would be viable in terms of pedestrian flow. It's likely that moving fans from the station to a bridge would create bottlenecks (particularly in the approach to the bridge) as well as the likelihood of crush situations, especially if there were barriers along the length of the footway to prevent egress on to the carriageway.

Again, as with discussions around crossings, there's a very great likelihood that fans eager to get into the stadium would not want to walk the distance from the stadium to the bridge and then wait in potentially large queues to get across it. OUFC's own assessment of the time it would take to get fans attending a sellout event across the bridge would be around 45 minutes.

Other transport options including parking and buses

The proposal states that 'many of our fans live within 20 minutes walk, cycle, or on public transport of the proposed location'. This is not the case as their principal fan base is located East Oxford. As such public transport, cycling or walking would be less desirable.

There seems to be little evidence that the current travel profile of fans attending matches which shows 90% travelling by car would change significantly, at least in the short term. This is likely to lead to problems locally with congestion and nuisance parking. Indeed the Sustainable Transport Statement contained in the application appears to be based on surveys of football supporters, many of whom have a vested interest in the stadium moving and so would be likely to say they would change their transport choices. This is not a reliable source of data as there's no way of knowing if this would result in an actual change in behaviour.

There are suggestions within the application about bus services being diverted from the Oxford Road to Frieze Way. It's not clear how this would operate and what impact this would have on other parts of the road network.

A rough estimate based on the current figures attending OUFC matches is that 7000 people will need to be transported by coach, at an average of 56 seats per coach that is around 132 coaches. With only 2 coach parking bays on site and assuming an optimistic 5 minute turnaround time that would suggest 5.5 hours would be required to get that many fans on site via coaches assuming they are queuing nose to tail to enter the site.

The short distance between the proposed entrance and the roundabout means there is the potential that coaches and other vehicles will be queuing from the roundabout up to the site. This is likely to cause significant congestion impacting all the feeder roads on to and off of the roundabout.

There is little information about where any chartered coaches or buses will park once they have decanted their passengers. This raises similar concerns to that experienced in central Oxford where tourist coaches spent hours with engines idling to keep air conditioning and heating running creating a problem with pollution in the area.

If the proposal is that they will park up on the various park and ride sites located around the area, that would suggest either very few coaches in total (which would exponentially increase the above estimated transit times) or that a significant proportion of the available parking will be taken up at these site by coaches. That leaves little additional space for other fans who have arrived by private car.

It's also notable that the assessments of car potential car numbers do not align with the number of passengers that could be accommodated within the average private car. Most vehicles will take a legal maximum of 5 people including the driver. In some cases up to 7 people could be accommodated. Analysis of the assumptions over private vehicle use and the number of fans attending would suggest that upwards of 14 people would need to be in each vehicle. I am not aware of any private vehicles that would routinely allow this number of passengers.

Use of park and ride sites

It would seem incongruous that a planning application of this size, involving the movement of thousands of people twice a week should rely on coach and private vehicle parking facilities that they do not own and do not have any direct control over.

The park and ride sites are likely to see an exponential increase in usage as other developments around the area are completed. So any consideration of the availability of space on these sites at the moment is likely to be misleading.

There's also likely to be increased demand for available space as proposals for traffic filters come into force in central Oxford. These are designed to encourage more use of buses to get in and out of the city, which is likely to mean greater use of P&R facilities.

It would seem short-sighted of both the County and District Councils to assume that the current availability of parking at the park and rides is going to be a long term position.

Traffic filters that are due to be imposed central Oxford in the near future are also likely to lead to increased use of park and ride sites close to the ring road. This means all these sites are going to have far fewer spaces available. Currently the P&R sites have usages levels of up to 80%. It's extremely like that there will be far fewer spaces once additional restrictions are imposed on private car use into the city.

Nuisance parking and congestion

Given that 90% fans currently arrive at the existing stadium by car and the application does not provide for any on-site parking for able bodied people, it seems likely that local P&R facilities will be quickly overwhelmed leading to motorists parking in and around the stadium on local roads.

This would suggest that a large number of parking enforcement officers would be required to police a wide area of temporary controlled parking. It's not evident from the application that they have made sufficient financial and operational resources available to deal with this. Given that there are likely to be 2 matches per week during the main season I would imagine that significant ongoing funding would be required to ensure that residents are not inconvenienced by nuisance parking.

There are proposals within the application for temporary controlled parking zones in the area. There seems to be an unrealistic assessment of the cost of maintaining these zones in the long term. There would need to be a planning condition that such zones would be facilitated and enforced by the club on an ongoing basis at their expense.

Safe access to the site

The plans show multiple pedestrian entrance points along the eastern flank of the site along with graphics showing pedestrian flows going across the Oxford Road using controlled crossing points. Given the capacity of the stadium at some 16000 fans it seems likely at peak times that these crossings will be frequently stopping the traffic on the Oxford Road.

Toucan crossings will keep the lights at red for road traffic while there are people on the crossing which will mean the road could be closed for significant periods on an ad hoc basis. This would have potentially serious implications for the Oxford Road in both directions and impacting on surrounding roads

It's also likely that some fans may not bother with the crossings at all and will simply pour across the road causing traffic stoppages and potentially put their and other road user's safety a risk. This scenario has already been raised by Thames Valley Police in their response to the scoping opinion application. The ramp coming up from the station is not wide and is also quite long. How long would this take for 16,000 people to get to the stadium?

Cycle parking should also be provided at 1 space per 50 seats. That is 320 spaces rather than the 150 proposed. The applicant is suggesting that cycle racks in Oxford Parkway should be relied on. Again this is not a facility that they have any control over.

Road closures

There are clear references in the application to road closures and 'diversions'. This demonstrates that they feel that a closure of the road will be vital to facilitate safe access to the site. That being the case, the traffic modelling should accurately reflect that. At the moment it doesn't.

Any closure of the Oxford Road is likely to have large knock on effects across the local road network especially up to Cutteslowe on to the A40 on to the M40 as well as the A34 and A44 routes.

All these roads are vital to the smooth running of the local and national network. The capacity of these roads to cope with the extra traffic generated as part of the Local Plan

Partial Review sites in Yarnton. Begbroke, Kidlington and Water Eaton needs to be factored in to any traffic planning. Given the vital transport link provided by the Oxford Road, the Kidlington Roundabout, Frieze Way and the Gosford Link Road to the A34 the impact of any such closures should be subject to physical studies rather than desktop assessments which would struggle to factor in the various key arterial routes as well as the additional stress posed on the network by the new housing sites, the potential cycling super-highway and changes to travel in and out of Oxford as a result of proposed restrictions to routes in and out of the city. All those roads are also likely to be under additional pressure in the future and the extra burden of large traffic and pedestrian movements around the proposed site were never factored in to those proposals.

I note the suggestion of reactive road closures for a short period of time with associated scenarios where these could be managed on an ongoing basis. These include proposals about speed restrictions with digital signage. However in practice any closure would still have impacts on traffic flow for some time given the flow of traffic on that road. It's also likely that any 'short' closures would probably turn into longer closures as there will be little in the way of stopping that if fans do not all leave in the same timeframe.

It should also be noted that HGVs from the Heidelberg Aggregates site behind Parkway also use this stretch of road frequently and it is assumed the traffic from the aggregate site will vastly increase when the various local developments come online. They can only use certain defined routes and any reduction in the carriageway and/or road closures are likely to impact safety.

Removal of the bus lane on Oxford Road

Drawings contained within the application show the permanent deletion of the bus lane currently running along the east side of Oxford Road. This is contrary to the local transport policy as it will not allow buses to bypass slow traffic during the morning rush. This will significantly increase the journey time to Oxford.

This presents a number of problems in highways terms, not least the loss of a facility that has been in place for a number of years and is still an integral part the road and traffic strategy for the area. Indeed it is further facilitated as part of the current Kidlington roundabout works which include additional clearways for buses to exit the Bicester Link Road on to the Oxford Road.

The provision of the bus lane was specifically intended to reduce congestion on this road a main route into Oxford City. Its removal will again have significant impacts on traffic flows in the area, especially during rush hours. It also raises safety concerns for cyclists if we have buses being pushed out of the bus lane into the main carriageway and the back again. As we have already had a cyclist fatality on this stretch of road due to conflicts with HGVs this raises very serious concerns for their safety.

Furthermore this may have an impact on the proposed cycling-superhighway that is being included in active travel plans for this stretch of road in response to development sites PR6b, PR6a, PR7a and PR6b (circa 2000 homes). Even if cyclists were allowed on

the expanded footpath, this would be a shared use path which contravenes OCC transport policy. It would also be virtually impassable during events being held at the stadium where significant crowds would be blocking these paths.

Indeed these proposals seem to be an extension of other plans forwarded by promoters of site PR6a which suggest that the bus lane could be used as part of the cycling superhighway into Oxford. Whilst I support the cycling enhancements it would seem to be overkill to completely delete the bus lane for that purpose. If the need was only for cycle access, a far smaller portion of the bus lane would be needed. Indeed, it's arguable that as bus lanes are already open to cyclists, the small portion of the highway required for cyclists to traverse the Water Eaton bridge would not justify the entire removal of the bus lane.

Whilst enhancements of active travel facilities should be supported, this would need to be balanced against the detriment to public transport services which are accessible to those who are unable to walk or cycle, especially those lesser abled individuals and those accessing bus services in the area to key medical centres such as the John Radcliffe Hospital.

There are nearly 5,000 houses due to be built in the overall area as part of the Local Plan Partial Review along with the expansion of Langford Lane business park, Oxford airport, Begbroke Science Park and North Oxford Development. This could be 10,000-20,000 + jobs coming to the area, excluding the residents. This is going to lead to added stress on the road network which has not been factored into this application.

It's stated in the application that OCC agreed with the applicants to use the VISSIM traffic modelling system but that instead they used something different. The applicants say that they will be appending the correct, agreed modelling at a later date. In the meantime it would seem pointless to examine the current modelling data in any detail. It would be useful to have some clarity on how this aspect will be handled. Will the application be deferred in its entirety or would there just be a period of re-consultation on the traffic proposals?

Further comments from Chiltern Railways suggests that they would expect significant S106 contributions from the applicants to cover the cost of increased rolling stock, enlarged station facilities and additional crowd control measures to accommodate increased numbers of rail users on match days and other events. They have also stated that the current facilities at the station were never intended to accommodate this level of intensive usage. Chiltern have also suggested that some contributions may be needed from local authorities. This would all need to be carefully quantified to prevent a sudden requirement for additional future funding that may not be readily available.

Ecology and Biodiversity

In terms of local ecological impacts there have been a series of reports lodged by Wild Oxfordshire, BBOWT and local ecologist Dr Judy Webb. These show that the site in its current unimproved state is a valuable resource of biodiversity and natural habitats due

to it being largely uninhabited for some time. The direct impact of building over these spaces as well as the impact from the operation of the site in terms of noise and other emissions on the surrounding woodland areas should not be underestimated. There are also proposals to remove a significant amount of the surrounding hedgerow and tree cover, including 3 veteran oak trees which are now the subject of TPOs.

There are also doubts as to the veracity of the data provided by the applicant in terms of wildlife studies, in particular bats and reptiles. The applicant's environmental consultants set up monitoring of the site although they did not notify the current leaseholders. This resulted in the inadvertent removal of the monitoring equipment which rendered the outcome of the studies largely void. It's stated that the equipment was redeployed, however this introduced a break in the inter-seasonal longitudinal study that can only be corrected by a full year's data.

Associated noise and light pollution is likely to have an effect on the local wildlife as well as impinging on the local human population, many of whom will be living in very close quarters to the stadium once sites PR6a, PR6b, PR7a and PR7b are occupied by some 2000 homes as well as the existing community in Garden City, Gosford and Water Eaton.

Suggestions that large areas of the east side of Frieze Way will be taken up with bus stops and shelters would see more areas of hedgerow and tree line removed which would also have a detrimental impact on BNG. I am not convinced that calculations of the baseline of biodiversity have taken this potential loss into account. It's likely that these areas would have to be fairly substantial to allow fans to queue and wait for buses without spilling out on to the carriageway. This will mean even greater removal of the existing hedgerow as well as potential safety concerns for other road users in managing large crowds in such a compressed space.

The proposed 'green space' at the far north of the site is likely to be tokenistic at best with trees in movable planters or in pits surrounded by concrete. Any planting on the periphery is unlikely to survive either the constant footfall by large groups of fans and the ingress of road film from the adjacent busy roads.

The proposed mitigation strategy seems to fail to consider the timings of losses and gains, or the cumulative effect with other developments, there is also no plan for ongoing ecological management.

I understand rare bat species such as the Barbastelle have been recorded on the site particularly the southern area by the woodland which contains many of the current bat roosts.

An independent ecologist's report noted 161 invertebrate species including 42 beetles, 17 butterflies, 7 moths, 1 lacewing, 4 dragonflies & damselflies, 20 true bugs, 17 bees & ants & wasps, 1 sawfly, 6 grasshoppers & crickets, 30 true flies, 2 molluscs, 14 spiders & harvestmen. The current non-intensive rotational willow coppice management of the

site centre has helped to maximise biodiversity on the site, especially of flowers and invertebrates.

Destruction of woodland can occur by development near or immediately adjacent as a result of hydrology change, light and noise pollution. Public access to the site is likely to increase these hazards.

Impact on existing businesses

Whilst it's claimed that the development will have a positive effect on local businesses this seems to be mainly focussed on the benefit to businesses that trade out of the stadium and the stadium itself.

There is also likely to be a negative impact on local businesses some of which may be overwhelmed by the influx of crowds, blocking their frontages. Concerns have also been raised with me that many of the proposed uses of the site will be directly competing with existing local businesses. The prospect of later expansion of the site is also of some concern and conditions preventing that should be considered as part of any approval.

Final considerations

There have been suggestions that the applicants will be supportive both practically and financially of other local sports facilities. This would of course be welcome but any such commitment should be enshrined within the planning conditions to ensure that this will be ongoing. The proposals is for a very long lease running into hundreds of years. There should be no possibility that at any time in the future should the site be used for anything other than as is proposed I the planning application. This includes protection for the surrounding areas against development creep as well as changes of use within the complex itself. It should be established if any lease will include a defensible covenant preventing any additional development on the site, along with protection for variation and/or extension of use. This would be especially important in view of the green belt status of the site.

The dominant position of the development is likely to have a detrimental competitive impact on many local businesses and sports facilities if such conditions were not rigorously imposed in an enforceable way.

The site is also prone to flooding in some areas to a significant degree and it has been noted that the water captured and kept on the site during heavy rainfall prevents local roads from being overwhelmed by surface water.

Whilst not a planning consideration, the financial standing of the applicant is tenuous with large losses being reported on their most recent accounts. The application seems to be founded on the idea that one or two wealthy benefactors will be in effective control of the development both financially and operationally. It is of material concern that if the stadium were to be owned by a sperate holding company the football club

could end up back in the same position as they are now with no control over their own site.

As this is referenced in the application due consideration should be given to what may become of the site should there financial problems in the future. This development would represent a he blot on the landscape should the football club become unable to service its own debts. Moreover if the site were to be owned by another private company there is the possibility that it could at some point in the future be sold on. Considering the proposed lease on the land is set to be in excess of 200 years, the long term stewardship of what is currently publicly owned green belt land should be a serious material consideration.

Conclusion

The site is not suitable for the proposed development both in terms of the applicants long term requirements, the planned residential developments around the site or the lives and quiet enjoyment of the existing inhabitants.

These proposals are not welcomed by the vast majority of the local residents and as such the operational phase is likely to be continually dogged by complaints from existing and future residents.

There are numerous challenging aspects to the proposal based on the compact nature of the site and the adjacent transport infrastructure.

Even though the site is close to a railway station it is far from able to cope with the potential increased number of passengers and would need significant investment and upgrading to enable it to do so. There are no proposals or financial undertakings from the applicants to provide the means to do this.

The provision of safe access from the station to the site is likely to be challenging. Although a direct bridge would between the two sites would largely deal with such concerns we are yet to see details of that. Any consideration of this application should be tied to those details and conditional on the completion for such a facility.

It seems likely that the development will not be able to achieve any biodiversity net gain.

The site is entirely on Green Belt and so will require approval by the Secretary of State along with proof of very special circumstances.

As a result of all the above concerns I am objecting to this application as it stands.

There may be opportunities for further consideration depending on if any of these concerns and others are addressed in the near future. In particular I would like to see details of the proposed bridge which would have a significant impact on any assessment of the transport plan.