

GOSFORD & WATER EATON PARISH COUNCIL

OXFORD UNITED STADIUM PROPOSAL: REF 24/00539/F

Gosford & Water Eaton Parish Council continues to object to this planning application for the reasons set out below.

1. Introduction

In our view there are many unanswered questions which should be resolved *before* this application is put before the planning committee.

Many of these questions relate to transport, traffic and parking, all of which have the potential to impact our parishioners. We are concerned that, as the Local Planning Authority (LPA), Cherwell District Council (CDC) is consulting on these issues, but it is Oxfordshire County Council (OCC) that has the authority on Highways. How is CDC ensuring that OCC is fully aware of the issues that are being raised and is addressing them?

Many of the concerns raised in our previous responses remain unanswered with the applicant failing to compromise on the design, for example to protect the Category A and two TPO¹ trees.

No mention is made of the footbridge which was promised by the applicant. In our opinion, the footbridge planning application can only sensibly be considered in conjunction with the stadium planning application.

This planning application was already document-heavy with huge amounts of repetition and seemingly no attempt having been made to make it easy for readers to negotiate. The December 2024 addition of around 130 additional documents and many hundreds of additional pages has compounded this. The applicant, Oxford United Football Club, and its agent, Ridge, cannot reasonably expect such a cumbersome application to be dealt with in the timescales that it is obviously seeking if it expects construction to commence in August 2025.

We may comment further on any of the matters below, and/or other matters, when additional information is published e.g. on Green Belt and Alternative Sites Assessments.

2. Summary of our most significant concerns:

TRANSPORT

- The '*at least* 30 minute' road closures and the traffic modelling are based on an unrealistic best-case scenario
- The planned road closure time of '*at least* 30 minutes' is fundamental but what does it actually mean? And why hasn't any sensitivity analysis been undertaken to establish the likely impact of longer road closures?
- The only justification for the '*at least* 30 minutes' seems to be some pedestrian modelling which indicated that the Oxford Road 'could' be cleared in this time.
- Changes to the application since the previous consultation have potential to increase road closure times but the traffic modelling does not take these into account. An

¹ Trees protected by Tree Preservation Orders

example is buses being allowed through the road closures. *Many* buses use the Oxford Road, in each direction, but the inexplicable assumption is that their passage won't lead to longer road closures.

- An *en masse* movement of supporters does not align with OUFC's early attraction and retention plans which would mean supporters arrived and departed over a longer time period.
- The lack of any strategic plan for any match day/event that falls between the two extremes of 'high' ticket sales (when the match day travel plan would be implemented), and major events/standard days, which are quote 'not expected to need a high level of management'. There will inevitably be events/match days which fall between these two extremes. But we can see no plans for what could be referred to as 'medium' events i.e. with thousands of people attending but which don't meet the applicant's definition of 'high' ticket sales.
- It is inevitable that, in future, events which are not match days could take place in the stadium. Yet the travel plan only caters for football matches.
- We question how CPZs will be effectively managed on match days over such a wide area.
- Measures to manage/discourage parking at Oxford Parkway lack any credibility yet a scenario with parking at Oxford Parkway has not been modelled because the applicant states: 'enforcement has been agreed with Chiltern and OCC'.
- Our ward includes the Oxford Road. We question why Gosford & Water Eaton Parish Council is not included in the Match Day Steering Group.
- No plan is in place for the management of supporters arriving at Peartree P&R but finding it full which could impact the diversion route but is not mentioned in the traffic modelling.
- As local residents who experience local traffic on a regular basis we believe Ridge's conclusion that road closures will not have a severe impact is not credible and we are deeply sceptical of the rationale behind it. Put simply we have no faith in this conclusion.
- We question why no changes to the scoping report were made following the consultation on the North Oxford VISSIM Model Scoping Report.

SAFETY

There are some safety aspects which must be considered as part of the planning application because mitigation could impact the length of road closures. For example: ensuring safe crossing at Peartree Roundabout; consideration of the risk of hostile vehicle movements to pedestrians walking from the Peartree P&R to the stadium, and the need for a muster area in the event of evacuation.

COMMUNITY BENEFITS AND VERY SPECIAL CIRCUMSTANCES

We may comment on this again once we have seen further documentation from the applicant. Meanwhile we note that community benefits remain undefined: in particular, there is no defined commitment from the applicant towards the upkeep of Stratfield Brake and no mechanism to enforce any such commitment. These omissions are in direct contrast to the obvious disadvantages to local residents arising from regular road closures and CPZs.

We request that, if possible, planning conditions be used to seek to enforce community benefits.

PROPOSED REMOVAL OF CATEGORY A OAK TREE & TPO PROTECTED TREES

We value the Category A Oak and the TPO trees. CDC should not countenance the removal of either the Category A tree or those trees protected by TPOs.

PRIORITY S.41 NERC WOODLAND AND WOODLAND MANAGEMENT PLAN

CDC specifically requested a buffer to this woodland but the applicant has chosen not to comply. We object to the failure to provide sufficient protection to the priority woodland habitat. The design of the stadium should be amended.

Fabrik, in its tree assessment, overlooks the value of dead, dying and decaying trees in the Priority Woodland. The woodland makes a strong contribution to biodiversity and provides potential roosting sites for bats, a protected species. Fabrik's proposals for the management of the woodland appear superficial and much more thought is required for the management of this priority habitat.

THAMES WATER

Because of the increasing demand on foul drainage capacity and fresh water supplies at Cassington Sewage Treatment Works we suggest that, if planning permission is granted, there should be a Grampian condition to ensure that infrastructure improvements are in place *before* any construction starts.

BIODIVERSITY

Claims that the fan zone at the north of the site will remain green, and will contribute to a biodiversity gain, seem unrealistic considering how many people will be using this area which is actually only about the size of Kidlington Roundabout.

3. Detailed comments

TRANSPORT ASSESSMENT

REF: Transport Assessment – Addendum, December 2024, 5 PROPOSED TRANSPORT STRATEGY, Variable Message Signing, Section 5.6.2 to 5.6.4

Chapter 5 informs us that VMS i.e. digital road signs to inform drivers, is a key component of the traffic management. However, we are told that the strategy 'will be developed with OCC'. When will this strategy be developed and how will it be funded? Given the historic precarious financial position of OUFC and the financial pressures that a stadium development would bring, it would not be wise to rely purely on OUFC for development of the VMS.

Section 5.6.3 states "It would be expected that 'local' VMS would be installed on radial routes to the stadium, including entries into Oxford Road at Kidlington Roundabout and at the Cuttleslowe Roundabout to direct traffic to use Frieze Way via Peartree roundabout and the A40 during the Oxford Road traffic management."

Conclusion: An *intention* to develop a VMS strategy and an *expectation* that local VMS will be installed is not a commitment to provide what are clearly stated to be key components of the traffic management. OUFC must give a clear commitment on how the VMS strategy will be developed and we request that Cherwell should consider a planning condition to this effect.

REF: Transport Assessment – Addendum, December 2024, 5 PROPOSED TRANSPORT STRATEGY, Section 5.6.9

5.6.9 This level of management is only expected if ticket sales are high. Major Events and standard days (small events) are not expected to need a high level of management.

This section states that the full Traffic Management Plan (TMP) will only be operated if ticket sales are high. This raises a number of questions:

- What does 'high' mean?
- Who will decide when ticket sales are 'high'?
- What will happen when ticket sales are not 'high' but just below 'high'?
- Will the site and Zone X be managed if the TMP is not in operation, and if so how?
- How would parking at Oxford Parkway be prevented if the TMP was not in operation?
- Would CPZs be enforced if the TMP was not in operation?
- What about other future inevitable events which are not football matches but will have high levels of attendance e.g. concerts? The TMP is based purely around football matches which is unrealistic because OUFC wants the stadium in use 365 days a year.

Conclusion:

The Transport Assessment focuses on two extremes (1) events with high ticket sales and where the TPM and road closures will be in force and (2) major and small events which are 'not expected to need a high level of management'.

What about events that fall between these two extremes? Clarity is needed around the meaning of 'high ticket sales' because this is the only scenario in which the TMP will be put into operation.

If the TMP is not in operation, exactly how will the site and Zone X be managed? How is the assessment that major and small events 'are not expected to need a high level of management' justified? And what will that level of management be? What about other inevitable future events with high attendance, such as concerts, which will have different arrival profiles and will require different management?

Controlled Parking Zones (CPZs)

The information provided by the applicant on CPZs lacks the detail requested by CDC in its Regulation 25 letter.

We have a general concern regarding the enforcement of CPZs. There is anecdotal evidence of (i) a general lack of enforcement of CPZs including around the current Kassam Stadium and (ii) enforcement being ineffective anyway.

Conclusion: We request:

- **a list of all the roads that will be included in the 2km CPZ**
- **an estimate of the number of households that will be affected**
- **clarification of who would be responsible for enforcement**
- **where the funding for enforcement would come from**
- **a firm commitment to robustly enforce the whole 2 km CPZ area**
- **an explanation of how enforcement measures could be an effective deterrent (e.g. wheel clamping, higher fines etc)**
- **clarification for match days when ticket sales are not considered to be 'high'. Will the CPZs be enforced for this and other events with fewer attendees?**
- **Information on the management of parking in areas that falls just beyond the 2km CPZ**
- **a plan for what happens if there is mixed local support for a CPZ with some areas supportive and others not.**

REF: Transport Assessment – Addendum, December 2024, 5 PROPOSED TRANSPORT STRATEGY, Section 5.6.21

The extract below lists the measures to manage/discourage parking at Oxford Parkway:

5.6.21 Oxford Parkway parking will be managed/discouraged by:

- Tickets and travel information will state that there is no match day parking at Oxford Parkway and options will be given for other travel choices
- The erection of 'No match day parking' signage
- Marshals enforcing the no match day parking
- Marshals (and barriers) will be located at car park egresses to protect cars leaving Oxford parking for at least a 45-minute after the whistle (timing to be trialled) to prioritise bus services and protect pedestrian safety
- Chiltern Rail will be using the car park to queue rail passengers, therefore significantly reducing available car parking
- Chiltern Rail has agreed to charge a high price for car parking on match day. The price will be determined through trialling different prices. Rail users will be able to purchase a normal priced car parking from the ticket office with a rail ticket

There is *nothing* in this list that can be considered to be a serious disincentive to park at Oxford Parkway.

Information and signage will likely have zero effect. In addition, some of the measures are likely to cause extreme disruption for those who wish to use the car parks for valid rail or P&R travel purposes which are in line with the Oxfordshire Transport Strategy which encourages the use of public transport. For example, disruption from having to queue to buy a normal priced parking ticket and being prevented from exiting as supporters are held back for 45 minutes (or longer).

How would marshals be able to identify supporters in order to turn them away? In future, when inevitably large events, such as concerts are held, how will these attendees be identified? Turning people away is not a realistic plan.

If OUFC intends to operate a delayed-exit policy from the car park it would need to be much longer than 45 minutes to be effective, but how would they achieve this without also preventing non-supporters from leaving the car park? And would delaying supporters from leaving the ground promptly mean that the proposed road closure time would need to be extended to allow them to cross safely?

What measures would be in place to prevent supporters from becoming rail users by purchasing the cheapest ticket available to enable them to avoid a higher priced parking ticket as proposed for supporters?

Conclusion:

These measures lack any credibility. In our opinion, they have no chance of success and in any event would cause disruption to those seeking to use public transport in line with the Oxfordshire Transport Strategy.

Oxford Parkway will be seen by supporters as the most convenient parking location for the proposed stadium. Prevention of parking at Oxford Parkway will therefore be challenging but is also therefore imperative.

We note that a scenario “with Parkway Car Park” has not been modelled (as stated at Section 7.2.5 and copied below) on the basis that “enforcement has been agreed with Chiltern Rail and OCC”. Unless a more reliable means of enforcement can be demonstrated, the traffic modelling is therefore invalid. In reality supporters will try and use Oxford Parkway car parks whatever enforcement is proposed and it is a material omission not to model this scenario.

Note: A scenario 'With Parkway Car Park' available to supporters has therefore not been modelled, as enforcement has been agreed with Chiltern Rail and OCC.

Arrival and Departure Profiles

REF: Transport Assessment – Addendum, December 2024, 5 PROPOSED TRANSPORT STRATEGY, Section 5.9

Match Day Steering Group

(includes Safety Advisory Group (SAG), Cherwell District Council, Oxfordshire County Council, Kidlington Parish Council, Thames Valley Police, British Transport Police, Chiltern Rail, Network Rail, Oxford Bus Company, Stagecoach and National Highways).

Conclusion: As the section of Oxford Road which is proposed for closure lies within the parish of Gosford & Water Eaton, we are surprised not to be included as participants in the Match Day Steering Group and suggest that it would be appropriate for this oversight to be corrected.

Similarly there is no representation for the University as owners of the North Oxford Golf Course, nor for residents of North Oxford.

REF: Transport Assessment – Addendum, December 2024, 5 PROPOSED TRANSPORT STRATEGY

Apart from a mention of pedestrian modelling in Section 7.2.8 which suggests that “the majority of supporters ‘could’ [not ‘would’!] be cleared from Oxford Road within 30 minutes”, we have seen no justification for the proposed road closure times. When road closures were first mooted they were for one hour before, and two hours after, matches. No explanation for the reduction to 30 minutes has been given.

The use of the Fruin Model for pedestrian modelling has also been called into question by Lathbury Road Residents’ Association because it seems to give a best-case picture of how pedestrians would move whereas the reality may be very different on match days or other large events.

We note that the closures are described as for ‘*at least 30 minutes*’. What does this mean? If 30 minutes is the minimum why hasn’t the traffic modelling looked at the impacts of longer road closures?

Neither has the proposed road closure time changed since other changes were made which will affect road closure times e.g.:

- the decision to allow buses and emergency vehicles through was taken, even though both will reduce pedestrian movements.
- The production of early attraction and retention measures (see below) which will affect pedestrian flows.
- The large number of shuttle buses expected to be operating in the vicinity of the stadium.

30 minutes appears to be based on a presumption that everything will go smoothly on match days, i.e.: supporters will move en masse in a short period of time; the train timetables will align with the majority of supporters arriving in a short timeframe (this is unlikely for safety reasons); the large number of buses and emergency vehicles which use the Oxford Road won’t cause any delays; the weather won’t cause any hold ups, no incidents will occur (despite the lack of fan segregation); etc etc.

In addition, clearing the Oxford Road of supporters in a short space of time is not consistent with the list of measures that OUFC is taking to persuade supporters to stay on-site for longer, both before and after matches – as listed below.

From page 68 of the Transport Assessment Addendum

Early attraction and retention measures

- Early attraction measure, such as:
 - Pre-Match build up programme including, player match previews, the manager pre match press conference and fixture preview.
 - Retail offers for food and drinks purchase before matches.
 - Retail happy hour offers which offers discounts during the hours before games.
 - Show other matches before games in stadium or associated facilities (club pub).
 - Provide pre-match entertainment for selected games.
- Retention measures, such as:
 - League round-up
 - Interviews
 - Hospitality packages structures to encourage staying after the game, including complementary refreshments, player appearances, post match presentation.
 - General admission packages that include free drinks post-match happy hour.
 - Catering kiosks and bars to stay open for a minimum of 1 hours post matches.
 - Post match entertainment kids/family zone.
 - Real-time travel information

We also note from Section 7.2.6 on page 101 (see below) that the arrival and departure profiles suggest that one mass, efficient, and fast movement of supporters is unlikely. Section 7.2.7 states that the target is to reduce Saturday arrivals in the hour before kick off from 75% to 55%, and Saturday departures in the hour after the game from 85% to 55%. Again this is not consistent with an intention to minimise road closure periods. If supporters are going to leave over an extended period of time, then road closures will need to be longer and should be modelled accordingly.

From page 101 of the Transport Assessment Addendum

Arrival and Departure Profiles

7.2.6 The modelling is also based upon the following arrival and departure profiles:

- Weekday arrivals – 20% arriving between 18:30 and 19:00, 75% arriving in the hour before kick-off with 5% non-attendance assumed.
- Weekday departures – 75% departing between 21:30 and 22:00, 20% departing in the following hour.
- Weekend arrivals – 20% arriving between 13:30 and 13:45, 55% arriving in the hour before kick-off with 5% non-attendance assumed.
- Weekend departures – 5% departing between 16:45 and 17:00, 79% departing between 17:00 and 18:00 and 11% departing between 18:00 and 18:15.

7.2.7 This is worst case as the target is to achieve a 55% arrival and departure in the hour after the game on Saturday (instead of 75% arrival and 85% departure, as modelled). This is outlined in the section 9.9 of TA.

Conclusion: We have seen no adequate justification for the chosen period of 30 minutes for road closures. In fact they are described as 'at least' 30 minutes which actually allows for them to be much longer. This short closure time is totally inconsistent with OUFC's detailed plans to keep supporters on-site for as long as

possible (early attraction and retention). 30 minutes also looks like a fictional best-case scenario to be achieved under optimal conditions.

We need a realistic forecast of how long road closures will last i.e. how long does 'at least' 30 minutes mean?

Longer road closures would impact the outcomes of the traffic modelling. Sensitivity analysis should be carried out on the traffic modelling to forecast what the resulting highway delays could be.

REF: Transport Assessment – Addendum, December 2024, Section 6.7.5

Table 6.17: Forecast P&R Use at Full Stadium Capacity – Saturday 14:00 to 20:00 (**D&P SCENARIO 3**) is used to demonstrate available capacity of P&R car parks on a Saturday.

Section 6.7.6 states that Peartree P&R may operate at capacity, although this concerning result is swept aside with broad assumptions about new matchday services etc.

Conclusion: It is possible, perhaps probable, that Peartree P&R will not have sufficient capacity for all the supporters who want to use it on Saturdays. We have seen no provisions in the Transport Assessment to allow for these fans to be turned away before entering a full site. How is this scenario to be managed?

The P&R sites were commissioned to allow people to access the City and other destinations such as the hospitals without using their cars. For early kick offs on Saturdays, it is likely that supporters will fill the P&Rs meaning that they won't be available for other users. Have the consequent economic disadvantages for the City centre been considered?

REF: Transport Assessment – Addendum, December 2024, Section 7.4

The Ridge assessment of the impact road closures on match days is that "it is not considered to cause a severe impact". However, this is based on a road closure period of 30 minutes with a 10 minute setup period and 5 minute set down period. As discussed above, we consider 30 minute road closures are overly optimistic, based on optimal conditions and, in demonstrable ways, conflict with OUFC's other objectives e.g. to increase the time spent on site pre and post matches.

As local residents, we know how sensitive the local road network is to, even minor events, so this conclusion seems unfeasible. But major events are also common e.g. incidents on the A34 which result in traffic diverting via our local roads. Yet there is no sensitivity analysis in the transport assessment or the traffic modelling. We believe this is a significant oversight.

We, and several other respondents made points such as this as part of the consultation on the North Oxford VISSIM Model Scoping Report dated August 2024. Our comments are attached but seem to have received no consideration and remain a cause for concern. This is demonstrated by the fact that many of them are repeated above.

Conclusion:

We are deeply sceptical of the conclusion that road closures will not have a severe impact on local roads. Local experience is that the optimal conditions needed for short road closure periods of only 30 minutes (which are actually 45 minutes) won't

necessarily exist in practice, and the impacts will in fact be much greater than is suggested by the modelling. A serious omission is that no sensitivity analysis has been carried out.

We question why Ridge was permitted to agree the scoping with OCC and National Highways, ignoring our comments on the North Oxford VISSIM Model Scoping Report.

LANDSCAPE AND VISUAL IMPACT ASSESSMENT

REF: ES Addendum Volume 1 Chapter 7 Landscape And Visual Impact

The Landscape and Visual Impact Assessment (LVIA) includes North Oxford Golf Club, Land west of Oxford Road, PR6b, as a committed development site. This lies within the Parish of Gosford & Water Eaton and is allocated for 670 dwellings.

The LVIA includes a number of incorrect assumptions/statements in respect of NOGC and we are concerned that these may have affected the predicted impacts and conclusions reached.

Due to the proposed pedestrian and cycle routes planned for the Oxford Road the majority of the trees and vegetation on the Oxford Road frontage will be removed. This is acknowledged in the PR6b Development Brief which states 'Most of the trees shown on the Oxford Road frontage are proposed new trees. There are 1 or 2 retained trees....'. Furthermore the plans for replacement tree planting along the Oxford Road frontage are not yet known but are likely to be much less dense than the existing, to reflect the residential nature of the site. In addition, and as shown in the Development Brief, most of the trees on the site will be removed with only a small proportion being retained.

Statements made in the LVIA which are incorrect include:

- 7.92 (*Views of the Site from PRoW Footpath 229/10/30 within North Oxford Golf Club to the south of the Site (Viewpoint 56) are truncated by the intervening treebelts associated with the golf course and A34*) and
- 7.145 (*The sense of openness of the Green Belt separating Oxford and Kidlington would be reduced as a result of these committed developments, although the well vegetated boundaries of the North Oxford Golf Course (Committed Development Site 2) mean that the perception of this urban extension would be limited from the surrounding area.*).

Also relevant is the figure below, copied from the ESA Volume 2, Figures 7.1 - 7.11, LVIA addendum figures, by Fabrik with the following narrative: VIEW FROM PROW 229/10/30 WITHIN NORTH OXFORD GOLF CLUB TO THE SOUTH OF THE SITE, LOOKING NORTH TOWARDS THE SITE. THE VIEW IS CHARACTERISED BY THE DESIGNED LANDSCAPE OF THE GOLF COURSE WITH A SENSE OF ENCLOSURE CREATED BY THE TREE BELTS DEFINING THE LAYOUT OF THE COURSE ITSELF. **VIEWES OF THE SITE ARE TRUNCATED FROM THIS ROUTE.**

These trees will not be retained when PR6b is developed so the Fabrik assessment is based on flawed information and is incorrect.



PHOTOGRAPH - VIEWPOINT 56 VALUE: HIGH
VIEW FROM FROW 229/10/30 WITHIN NORTH OXFORD GOLF CLUB TO THE SOUTH OF THE SITE, LOOKING NORTH TOWARDS THE SITE. THE VIEW IS CHARACTERISED BY THE DESIGNED LANDSCAPE OF THE GOLF COURSE WITH A SENSE OF ENCLOSURE CREATED BY THE TREE BELTS DEFINING THE LAYOUT OF THE COURSE ITSELF. VIEWS OF THE SITE ARE TRUNCATED FROM THIS ROUTE.

In addition the statement made on the table page 59 (Planting and tree belts associated with new Golf Course on Committed Development site 3 would truncate views of the Proposed Development and Committed Development schemes) assumes that a new golf course will be built on Frieze Farm. There is no evidence to support this assumption.

ACTION REQUESTED: We request that the applicant's agents are made aware of these errors and are asked to reconsider the relevant Mitigation and Residual Effects and if necessary, the conclusions in the LVIA using correct information.

We also wish to object to the permanent long term adverse effects of receptors on areas within our Parish such as Cromwell Way which are described as 'minor' but in practice are likely to have a significant permanent impact on our residents as a result of noise and light pollution. In view of the errors on the Golf Course development and invalid assumptions around Frieze Farm, we also have doubts regarding the accuracy of Fabrik's assessment and request that it is reviewed.

REF: ESA VOLUME 3, APPENDIX 7.2, UPDATED LVIA IMPACT ASSESSMENT TABLES NOVEMBER 2024

Landscape Receptor in the contextual landscape: Perceptual and Aesthetic

The predicted significance of this effect at year 1 is 'MODERATE-MINOR ADVERSE' due to the massing of the building, falling at year 15 to be 'MINOR ADVERSE'. The justification for this fall is that the buildings material will weather and the landscape proposals will mature.

Many of the other Landscape Receptors also have a predicted effect which is expected to fall by year 15, although it should be noted that many remain within the range 'MODERATE ADVERSE' to 'MINOR ADVERSE'.

Much of the justification for this fall in severity of impact is irrelevant. Other justification includes the impact of: retaining existing features and some vegetation;

the landscape proposals; the (in our view questionable) quality of the public realm; open spaces etc.

The impact on the Landscape Receptors has been manipulated by overstating the impacts of features of the proposed development after 15 years and this has been used to understate the impact and therefore to draw overly positive conclusions about the effect of the proposed development.

Conclusion: The Regulation 25 letters from Cherwell District Council included a request that: *“Reasoning should be provided within the text as part of the narrative and to support the findings as summarised in the landscape and visual tables within Appendix 7.2 (Vol 3).”*

However, the Applicant’s agent, Fabrik, has failed to provide adequate reasoning.

Fabrik’s justifications are flawed and we disagree with the Fabrik conclusion that the effects of the proposed stadium building are balanced. We believe that this proposal represents overdevelopment of this small site with overwhelming adverse effects on both the immediate and the wider area. We therefore continue to object to the proposal.

THAMES WATER

There is uncertainty around the ability of the existing sewage system to meet the needs of foul drainage and fresh water supplies for nearby developments. This has led the Environment Agency to object to these developments.

We note the intention to connect to Cassington Sewage Treatment Works as opposed to the Oxford Sewage Treatment Works. However, Cassington is also under pressure due to the large Saltcross development at Eynsham. In addition there is much uncertainty surrounding Thames Water’s precarious financial position which may influence its ability to provide the necessary infrastructure improvements.

We therefore suggest if planning permission is granted there should be a Grampian condition to ensure that sewage and water infrastructure improvements are in place *before* any construction starts.

ES Addendum Volume 2 Figure 4.12 Tree Removal Plans and the Aboricultural Impact Assessment, November 2024

Trees are a material consideration within the planning process.

TREES, INCLUDING A CATEGORY A OAK TREE AND THOSE PROTECTED BY TREE PRESERVATION ORDERS

The assessment of trees on the site is based on an assessment of their condition and longevity over the next ten years. This approach overlooks the ecological value of dying, dead and decaying trees which make a strong contribution to biodiversity and potential roosting sites for bats, a protected species.

Understating the value of older trees is relevant to the proposed site as well as to the adjacent priority habitat woodland, which contains many Category B trees. Fabrik, the consultant, has noted that the adjacent woodland also contains trees that have the potential to become veteran trees which, as noted on the Woodland Trust website, "... provide holes, cavities and crevices which are especially important for wildlife".

The Category A Oak tree is a large high quality tree which will have its own complex ecosystem which will not be replaced by the Biodiversity Net Gain proposals.

The applicant's approach to trees is to remove them rather than to compromise on the design of the stadium.

CDC should not countenance the removal of either the Category A tree or those trees protected by TPOs.

CDC placed TPOs on these trees because they are considered "to make a significant visual impact on their local surroundings or have particular considered values" (reference: <https://www.cherwell.gov.uk/info/7/environment/280/tree-preservation-orders>). In addition the council took into effect features such as: the prominence and size of the tree; its structural and physiological condition; its potential longevity; whether it has any ecological or historical value and; whether its existence is likely to be under any level of threat.

Conclusion:

We value the Category A Oak and the TPO trees and we want to see them retained in line with the protection offered by the TPOs and the protection that should be given to Category A trees. CDC should not countenance the removal of either the Category A tree or those trees protected by TPOs.

PRIORITY S.41 NERC WOODLAND

There have been inadequate design adjustments to ensure that the whole of the woodland to the south of the site (S.41 NERC protected habitat) is protected. The buffer requested by the council has not been provided. Instead Ridge has sought to underplay the fact that the proposed stadium lies too close to the woodland and has proposed measures such as grass-crete which will not provide sufficient protection. The close proximity of the proposed stadium, with its noise, light levels, inevitable damage/cutting back of the trees; and general human disturbance, also contributes to the application's failure to meet the level of protection required by the Natural Environment and Rural Communities Act.

WOODLAND MANAGEMENT PLAN

As previously stated Fabrik has overlooked the ecological value of dying, dead and decaying trees which make a strong contribution to biodiversity and potential roosting sites for bats, a protected species.

Fabrik suggests (Section 7.5.3) there is an opportunity to manage the existing woodland via a woodland management plan with the objective to maintain a healthy woodland structure and enhance its biodiversity as a feature.

This poses many questions: How will management acknowledge the biodiversity value of dead, dying and decaying trees which is a result of the lack of management? Who will manage it given that it is owned by Oxfordshire County Council? How will the council ensure that it is managed with an appropriate level of expertise? How will it be protected from encroachment by visitors to the stadium?

Conclusion:

We object to the failure to provide sufficient protection to the priority woodland habitat adjacent to the site. We would like to see the design of the stadium amended in respect of both these concerns.

Replacement tree planting can't be regarded as equivalent in value to the quality and age and biodiversity of the trees that are proposed to be removed.

Fabrik proposals for the management of the woodland appear superficial and much more thought is required for the management of this priority habitat.

SAFETY CONCERNS

Safety of supporters will be a concern for the Safety Advisory Group but aspects of it must be considered as part of this planning application in case additional road closures are needed to implement safety measures. For example:

- Access from Peartree P&R where many supporters are expected to park will mean large numbers of people crossing Peartree Roundabout. How will this be managed safely given that this is also the road diversion route?
- What measures will be in place for hostile vehicle mitigation to protect pedestrians walking from Peartree P&R, over Peartree Roundabout, around Loop Farm Roundabout and along Frieze Way?
- If evacuation of the stadium was required, where would supporters muster?

VERY SPECIAL CIRCUMSTANCES (VSC)

Community benefits are part of the applicant's justification for VSC but the specifics are conspicuous by their absence. Conversely the disadvantages to local residents, for example regular road closures, CPZs, and difficulty accessing Oxford Parkway are only too clear.

This parish council pays a significant sum towards the upkeep of Stratfield Brake which the applicant has said it would contribute to. However, that contribution has not been quantified in any way, in fact OUFC, has refused to disclose it. There is also no effective mechanism to ensure that OUFC, which has been beset by financial difficulties in the past, would honour any commitment. We note specifically that the Collaboration Agreement signed between OCC and OUFC is not fit for purpose in this respect.

BIODIVERSITY

The area at the north of the site is being promoted as a fan zone for use on match days and as an area for use by the community at other times. It is also claimed to be an area where biodiversity gain will occur. As the size of this area is similar to Kidlington Roundabout and it will be in regular use by thousands of people we question whether it will in fact be green at all. Claims of increased biodiversity in such a busy area appear unlikely in practice.