

## 1 General

- 1.1 It is becoming clear that the proposed location is, at best, barely suitable for a major commercial football stadium of 16,000 capacity. On paper it may appear a highly sustainable location. However, the need for road closures and other disruptive mitigation measures proposed for crowd safety, traffic management etc show that it is not 'well placed in the transport network'. The application glosses over difficulties and fails to answer several key questions adequately. These need to be resolved as part of the planning process. This is important given the level of public concern. The whole application is very finely balanced with extremely limited capacity to "fix problems" once it is built. For example, the actual duration of road closure is still to be determined "through workshops". The difference between a "high ticket sale" event requiring traffic management and "Major Events" (that might not) is not clear. Crowd management, evacuation plans, CPZ arrangements are too important to be left to be finalised once the stadium is operational. On the evidence provided so far, KPC is concerned that the operational requirements of the stadium will place reasonable demands on residents.
- 1.2 KPC is opposed to any solution that involves road closures and as such, considers that plans for an Oxford Road Bridge need to be considered as an integral part of the main stadium application.
- 1.3 The applicants seem to be relying on various public authorities to provide essential operational elements – for example for OCC to help deliver and maintain Variable traffic signage and Controlled Parking Zones; for Thames Valley police to decide on safety measures etc. In our view, who will take responsibility needs to be confirmed via written agreements before planning permission can be granted.
- 1.4 We remind CDC – and OUFC - that public opinion polls have consistently shown that around 2/3<sup>rd</sup> of residents impacted by the stadium are opposed to the development at the Triangle. That majority is now likely greater now that road closures have since been made an integral part of the stadium operation.
- 1.5 We ask CDC to take a highly risk averse approach when considering the viability of this application. A modern, new build commercial football stadium should be capable of routinely hosting major events and capacity events without causing significant local and potentially wider disruption. This is necessary to ensure sustainability should the club succeed in gaining promotion.
- 1.6 We agree that the proposed Match Day Steering Group (ESA v3 A10.1 part 1 pt 5.9.1) should include KPC. OUFC should also invite other directly affected councils (N Oxford, Gosford/ Water Eaton and Yarnton). The remit (5,92) rightly includes traffic, parking and crowd management elements. It should not in our view, include facilitating OUFC's own commercial interests such as consideration of "early attraction measures" and "Supporter retention measures"
- 1.7 The large number of resubmitted and new documents, coupled with the extremely difficult construction of the application mean that it is not possible for KPC to adequately review the latest submission. The limited time allowed for a consultation of this importance and complexity is not reasonable. We welcome CDC's willingness to accept comments on an ongoing basis. KPC reserves further comment and may submit further detailed questions in due course.
- 1.8 Despite claims to the contrary, this latest application fails to adequately address most of the concerns raised by KPC and others at earlier stages of consultation. This could be due to what appears to be a failure to wait for and consider the results of CDC's previous consultation (on the VISSIM modelling scope and other matters). We ask CDC to ensure that these oversights are fully corrected before the application is decided.

## 2 Parking Control

We understand that supporters will **not** be allowed to use the Parkway P&Rs operated by Chiltern Rail and Oxford County Council. Supporter traffic will be directed to other Park and Rides around the City with a likely preference for Peartree.

- 2.1 The lack of parking at Parkway is likely to increase on street parking and inconvenience to residents.
- 2.2 We understand that the traffic modelling assumes supporters will be park elsewhere (e.g. Peartree and other P&Rs). This assumption is suspect. The modelling should incorporate the scenario where measures to “discourage” parking prove ineffective.
- 2.3 The applicant has shown capacity currently spare at each P&R however there is no projection of likely demand as a result of the increased use from PR sites, the potential expansion of East West Rail at Parkway and the effect of OCC transport strategy involving gradual reduction in the use of the car going into Oxford. Demand will increase and this needs to be factored in.
- 2.4 Transport Assessment – Addendum, December 2024, Section 6.7.5 states that Peartree Park and Ride may operate at capacity in future. It may not be able to meet supporter demand. It is not clear how this would be managed and again it is likely to increase demand for street parking in the vicinity.
- 2.5 The traffic exclusion zone should perhaps be extended further along the Oxford Road into Kidlington to control parking along the roads running either side of it, and also to limit access to Garden City.
- 2.6 We need clarity on why land at Stratfield Brake is included in the stadium red line and whether it is intended to be used for parking supporter coaches/ cars and if not, how this will be prevented.
- 2.7 We note that Thames Valley Police (letter 01 May 2024) objected pending further information which has not been provided for example:
  - *All possible parking locations around the site.*
  - *Match day CPZ’s and management and prevention of unauthorised parking in the vicinity of the site including local residential roads*
- 2.8 OUFC have said that there will be a CPZ subject to public support and that the CPZ will be actively “supported”. It is unlikely that the introduction of CPZ will have public support. At a meeting with OUFC and KPC they stated that this was for OCC to resolve. This is a very serious concern for the south part of Kidlington for the large number of residents in within the 2 km radius. CDC needs to ensure that OUFC provide full details of the CPZ location and management plans as part of their planning application.
- 2.9 There is no detailed information in the application despite this being raised in the CDC Section 25 letter to OUFC. OUFC should be required to provide a detailed CPZ proposal for the management of stadium parking and ensure the CPZ plans are fully approved before any consent can be granted. KPC would like to see the detail to include the TRO, the arrangements for enforcement over the 2 KM radius and population of 20 rising to 30K. KPC do not believe it is possible to enforce on this scale on match days.

## 3 Crowd Management

- 3.1 We consider it is essential to see modelling of traffic and crowd management that allows for full segregation of away supporters when necessary.
- 3.2 The detailed crowd management plan still needs to be agreed. We could not trace this in the application.

3.3 KPC understand that there is a proposal to create a pedestrian route from the proposed stadium along Frieze Way to Pear Tree Park and Ride. We need to see more detail of this in the application addressing the concerns:

- how the route will cross the Pear Tree interchange with the A34 and the access to the service station.
- Whether there will be a need to protect pedestrians from vehicle ramming attack along the route

#### **4 Traffic Management Plan (TMP) and Road Closures**

KPC considers that crowd management and traffic control are inseparable given the plan for pedestrian access to use the Oxford Road.

- 4.1 The latest model takes NO ACCOUNT of any of the comments made to Cherwell District Council's own consultation on the VISSIM modelling. Hence the methodology and conclusions remain highly questionable. It fails several common-sense tests and makes unrealistic 'best case/ average' assumptions. Examples include the reliance on short road closure and stadium clearance times) for high volume events. Tellingly, the model does not include a sensitivity analysis which is important given the large number of variables such as the inevitable variations of timing and crowd movements. We ask CDC to require OUFC to correct the modelling to take proper and full account of the consultation feedback.
- 4.2 The traffic modelling was agreed with Oxford County Council (OCC) and National Highways (ESA V3 A10.1 6.2 ). This is a complex technical issue, and we have seen no documentation to demonstrate that OCC are comfortable with the results of the VISSIM model. Indeed, OCC continue to say that it will not permit road closures so we ask CDC get some clarity from OCC who are objecting to a road closure but are allowing OUFC to proceed with the road closure.
- 4.3 We note that Highways England still have a holding objection with concern about the A34
- 4.4 We do not agree with the suggestion that the measures required are normal practice. For a planning application for major development to require the closure of at least one major local arterial A road in order to operate safely is highly unusual. KPC are opposed to any planned road closures (which will in practice be of variable duration) which could cause frequent, severe and prolonged disruption.
- 4.5 We do not agree with the applicant's conclusion that road closures will not "cause a severe impact". This conclusion is based on the unrealistic assumption of a road closure period of 30 minutes with a 10-minute setup period and 5 minute set down period. KPC remain concerned about traffic serving Kidlington and surrounding villages which will have a population of around 30K. Experience has shown that there is considerable congestion at peak hours without any further development.
- 4.6 We have no confidence that the crowd and traffic control measures that will be required for the stadium to operate will be sustainable.
- 4.7 We consider a viable high-capacity pedestrian bridge to be an operational necessity. We are advised that to serve a stadium of 16K the steps or ramps would need to be 8m wide. It would be a significant structure for which there seems insufficient land in the highway. We understand that there has been preapplication enquiries from OUFC regarding a bridge. The stadium and bridge applications should be considered as one – the stadium application cannot be decided in isolation.
- 4.8 Transport Assessment – Addendum, December 2024, 5 PROPOSED TRANSPORT STRATEGY, Section 5.6.9 states that "this level of management (the TMP) 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 is concerning since if this expectation is proven wrong the TMP will need to be imposed for all major events. Equally, the club may well succeed in regularly achieving high ticket sales, since the stadium capacity is

low in comparison to most clubs at their current league level. We ask Cherwell to assume that TMP will be needed regularly. We need to know:

- What is considered “high attendance” to trigger TMP? How frequent will these events be?
- Will OUFC meet the costs of traffic and crowd management control measures in full and if not how will responsibility be distributed?

- 4.9 We need to see details of the TMP and crowd management requirements for the other “major events and standard days” along with the predicted frequency of each. (Note: our view, any event that merits opening the stadium is likely to need some form of TMP, since we know from experience that events of ~3000 attendees at Stratfield Brake can cause local parking / traffic/ crowd issues).
- 4.10 The transport assessment and traffic modelling do not incorporate a sensitivity analysis to allow for longer road closures, staggered crowd clearance times and major events elsewhere eg Blenheim. CDC should ensure this is rectified.
- 4.11 The traffic exclusion / controlled zone is extensive. It impacts several key roundabouts (Kidlington, Cutteslowe, Loop Farm and Peartree plus the Parkway exit junction). The Triangle sits at a highly sensitive and known potential pinch point in the local traffic network with potential to impact the A34, A44, A4260, A4144 and A40.
- 4.12 Any disruption at the Kidlington roundabout will severely disrupt the proposed diversion of traffic onto the A4260 We would like to see detailed plans for dealing with match day traffic gridlock events at this location including alternative routes and signage.
- 4.13 There is a clear risk that the police will just close the road completely disrupting the service buses which are very regular from Bicester, Banbury, Woodstock and Kidlington all going into Oxford or the hospitals.
- 4.14 Traffic and crowd control modelling times are based on achieving rapid and orderly crowd movements at well defined pre and post match arrival/ departure times. It is stated ESA v3 A10.1 part 1 5.4.3 that the majority of supporters (at 16K capacity event) could be cleared from Oxford Road within 30 minutes. In practice, clearance times may often exceed this since:
- departure time is not controllable and may depend on game outcome.
  - Rapid stadium clearance conflicts with commercial interests eg maximising the prolonged use of hospitality venues etc.
  - the proposed 45 min delay in allowing egress from Parkway P&R is likely to encourage supporters to remain in the stadium

## **5 Security, Hostile Vehicle Mitigation, and evacuation measures**

The current application includes more details of these measures and confirms that anti-terrorism measures will be put in place both within the stadium footprint and on the pedestrian approach routes

- 5.1 It is stated that emergency evacuation can be performed in line with are in line with recommendations contained within the Guide to Safety at Sports Grounds (Green Guide). However, the actual emergency evacuation procedure is still to be developed. This needs to be provided as part of the planning application. Since it seems likely that in the event of evacuation it will be necessary for supporters to spill out of the “vomitory exits” onto the Oxford Road, Frieze Way and Kidlington Roundabout.
- 5.2 Similarly, we are assured that unauthorised access or vehicle borne threats can be controlled by installing bollards, plant boxes, heavy ‘street furniture’, trees and bushes, or more robust barrier systems to reduce the risk of penetration in a crash. However, the details remain to be largely worked out once the stadium is operational. It is therefore possible that prolonged road closures may be required for safety

reasons. In the circumstances, we ask CDC to secure assurances from OUFC and the relevant authorities that the measures will not have an unacceptable impact on residents and transport network before planning approval is determined.

5.3 We note that ALL the last 3 Stadiums built in England have traffic management for the duration of the match plus 60 minutes, i.e. about 3.5 hours. But none are arterial A roads, At Brentford, an A road is affected, but there is a diversion some 100 meters on. Further, Coventry FC recently implemented post match duration closures of the dual carriageway A444 for crowd safety reasons. The closure is in place for all major events of significant scale at the CBS Arena – including Coventry’s home matches. It has been unpopular with supporters who have faced long delays. We ask CDC to take serious note of these precedents and to ensure that the “whole of match’ and extended pre-post closure scenarios are fully factored into the traffic and crowd modelling.

- Brentford <https://www.brentfordfc.com/en/residents-information>
- Tottenham Hotspur <https://www.tottenhamhotspur.com/the-stadium/attending-matches/getting-here/road-closures/>
- AFC Wimbledon <https://www.wandsworth.gov.uk/parking/parking-zones/afc-wimbledon-stadium-event-day-restrictions/>
- <https://www.ccfc.co.uk/news/2025/february/04/guide--matchday-guide-for-wednesday-night-s-game-vs-leeds-united/>

## 6 Public Transport and active travel

The latest proposals designate Parkway as the main arrival/ departure hub for regular buses and shuttle buses bringing supporters to the stadium. It will also accommodate all match day taxi drop off and pick up since no taxi parking will be provided on Site.

- 6.1 At a meeting with KPC, OUFC stated that the road would be closed to enable fans to traverse the main road to Parkway whilst insisting that service buses would continue to have passage. KPC cannot understand without more detail how this is safely possible. It would appear that buses will only be allowed along the current bus lane with marshalling. How will service buses be able to travel in both directions? Has the modelling allowed for the safe passage of the large number of bus routes using the Oxford Road to link Oxford with the North?
- 6.2 The very high number of supporters expected to travel by bus, shuttle bus or coach will require a large fleet. CDC should be assured that Parkway can handle the expected ~142 bus drop offs plus a similar number of pick ups post event.
- 6.3 It is proposed to delay stadium traffic from leaving Parkway for a period (provisionally 45 minutes) at the end of an event. It is not clear how this will be managed and how it will affect regular commuters.
- 6.4 It is not clear whether supporter coaches will be permitted to use at OCC’s Parkway P&R, given a) the restrictions on supporter use and b) the need for segregation. Please clarify the coach parking arrangements that will be deployed.
- 6.5 Since parking within the stadium is very limited and taxis are not allowed on site, we ask for clarification how less able supporters with limited mobility will be accommodated.

## 7 Local Plan Context - Cherwell 2040 Local Plan

- 7.1 Our original concerns have not been resolved and still stand

## **8 Green Belt (7)**

- 8.1 Our original concerns have not been resolved and still stand. Commercial development of the site proposed for the stadium will cause coalescence of settlements and other irreparable harm to the Green Belt. Furthermore:
- 8.2 CDC S25 Letter challenges OUFC regarding alternative sites. This will inform the very special circumstance in any proposal to release land from the green belt
- 8.3 The applicant has stated that there is no change to the original documents referring to alternatives. We assume that OUFC have not answered the questions raised by CDC about alternative sites.
- 8.4 We suggest that a wider, county wide trawl would be appropriate and are not convinced that the need to retain “Oxford” in the club’s name is sufficient reason to limit the search radius.

## **9 Site search and justification for leaving the Kassam Stadium**

- 9.1 Our original concerns have not been resolved and still stand

## **10 Ecological considerations**

- 10.1 Having reviewed the latest documentation provided by Ecology Solutions, KPC’s original concerns remain unchanged, and we refer CDC to them.
- 10.2 Re: ecological value: we repeat: “Many of the statements of OUFC’s consultants, Ecology Solutions, are open to serious question as to the accuracy and reliability of their methodology and conclusions.” For example – the applicants still claim that “the development will be positively beneficial to badgers, bats, birds and Great Crested Newts”. It is clear that ~80% of the current green space will be sterilised; that badgers will lose almost all foraging and the impact on bats will be significant. This statement alone should be sufficient cause CDC for to question the validity of the ecological submission.
- 10.3 A major omission is failure to properly consider the impact of the stadium and associated development (such as the Frieze Way foot/ cycle path and pedestrian bridge) on bats, their roosts and foraging areas. Cherwell need to obtain and consider proper, detailed, area wide bat as required under legislation.
- 10.4 The new documentation seeks to justify the removal of mature trees (including a cat. A tree of high value and life expectancy) and the failure to provide an adequate buffer between the stadium boundary and the priority woodland to the immediate south. Cherwell should insist on the need to correct both points.
- 10.5 The application now incorporates a public walkway/ cycle path along the length of Frieze Way. The impact of this on lighting and loss of hedgerow should be included in the ecological assessment. KPC’s original response pointed to the need to widen the area under ecological assessment and to repeat the biodiversity impact assessment as necessary in the light of impactful changes to the application.

## **11 Sustainability- energy and carbon/Waste and materials**

- 11.1 Our original concerns have not been resolved and still stand

## **12 Water and flooding**

- 12.1 Our original concerns have not been resolved and still stand



### **13 Landscaping and connectivity**

13.1 Our original concerns have not been resolved and still stand

### **14 Visual Impact**

14.1 The Landscape and Visual Impact (LIVA) assessment seems to conclude that the stadium would have only a moderate-Minor adverse effect overall and considers that the stadium would be “a local landmark at the N. approach to Oxford”; a destination in its own right and “of similar use to the Stratfield Brake sports club. This is another technical area where common sense suggests that a large building of similar height to the new “Red Hall” at Oxford North will be out of keeping with it’s surrounds and have a major-moderate adverse effect across many parameters.

14.2 We note the stadium design has been amended to soften its impact when viewed from Stratfield Brake. However, this is purely tokenistic. The stadium will be very large, unbroken, industrial mass that replaces a previously open green space.

14.3 The visual impact when viewed from the new homes is significantly underestimated since no allowance has been made for the removal of the existing tree cover.

14.4 Our other original concerns remain valid and unresolved.

### **15 Local Community benefits to the Council and residents**

We emphasise the need for CDC to press OUFC for greater clarity on community benefits to local residents.

15.1 The primary direct benefit is OUFC’s offer of support for the maintenance of Stratfield Brake. OUFC have withheld details of the value of this offer for commercial reasons, despite Kidlington and Gosford Water Eaton Parish having a financial interest as leaseholders. Without this information, KPC cannot form a view as to whether any financial contribution would be acceptable.

15.2 Notwithstanding this, KPC asks CDC to secure assurances that OUFC will support the maintenance and improvement of facilities at Stratfield Brake via adequate direct, long term, index linked funding and for this agreement to be legally binding.

15.3 Other local benefits remain equally elusive and as far as we can see are limited to a single line in the recent submission which states that OUFC “feel there is a benefit”. KPC recently met with OUFC, who when asked to name 3 benefits for Kidlington could not name any. Further, they stated that “Schools within the Cowley, Blackbird Leys, Wood Farm, Barton and Littlemore areas have priority for the provision of work experience placements at Oxford United FC.”

15.4 KPC believes the Road closures may have an adverse impact on Kidlington and wider North Oxford, including the new proposed developments that are the boundaries of Oxford City and Kidlington. We ask CDC to require OUFC to provide a validated Commercial Impact Analysis on the local area economy and businesses, of road closures of Oxford Road and Freize Way. We believe match days could impact for the entire duration of the match with additional 45 minutes or more before and after the match. This may be a requirement for the safe evacuation of the stadium and requested by TVP which has not been addressed in the latest submission by OUFC. There is precedence for such road closure, CBS Arena Coventry and A444.

### **16 Education and training**

16.1 Our original concerns remain valid and unresolved.