

Campaigning to protect our rural county

CPRE Oxfordshire 20 High Street Watlington Oxfordshire OX49 5PY

Tel: 01491 612079 <u>campaign@cpreoxon.org.uk</u> cpreoxon.org.uk

Submitted by portal and by email to:

planning@cherwell-dc.gov.uk

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Dear Planning Team,

CPRE Oxfordshire response on application 24/00539/F Proposed stadium on Land to East of Stratfield Brake

CPRE Oxfordshire object to the approval of this application for four primary reasons:

- the transport network is insufficient to accommodate the increased traffic and parking and further work must be undertaken to find means to alleviate this before any advancement of these plans
- the site plays a vital role in protecting the green space between Kidlington and Oxford City and was part of a plan created and funded by Oxfordshire County Council to prevent the two coalescing. If allowed It also opens potentially the commercial development of the rest of Frieze Way.
- the danger that the remaining areas of nearby land which remains in the Green Belt such as the Stratfield Brake sports grounds will become car parking for the proposed stadium by default.
- the lack of any strategy to deal with the issue of foul water disposal.

Transport

CPRE Oxfordshire have serious concerns over the transport network capacity to accommodate the proposed new stadium.

We have commissioned an independent Transport Assessment Review and attach as a separate file (2025-02-05-JHOxfordTA Final (RevA).pdf) the full findings of this Review. One of our reasons for so doing was to establish whether the Assessments provided by OUFC are sound, as we were concerned that in addition to the impact the proposed Stadium would have its effect would be much wider and negatively affect other areas within the Green Belt and the wider countryside around Oxford. The Review by Mayer Brown shows our concerns were justified.



We highlight the key findings:

"It has been concluded that the transport impacts associated with the new stadium proposals have not been fully considered "

The report flags up areas of concern and makes recommendations for further analysis:

- The proposed stadium parking proposals are likely to result in a significant shortfall of car parking for supporters during match days based on the assumptions made;
- The vehicle mode share has been based on a GIS assessment, which could be underestimating the mode share and parking demand for supporters. It is recommended that surveys at the existing Kassam stadium are carried out to determine supporter travel patterns;
- The strategy for supporter parking hinges on the availability of spare capacity at the P&R sites across the city. However, the assessment in the TA is based on an existing demand at the P&R sites that is lower than might be expected for an established P&R network. This assumption is supported by surveys at the Oxford Parkway and Peartree P&R sites undertaken for the TAA, which show higher existing parking levels (i.e. less available parking for supporters). It is recommended that surveys are carried out at the other P&R sites (Seacourt, Redbridge, Thornhill and Eynsham) and the capacity assessment is revisited;
- The car parking requirements for the stadium ancillary uses have not been met by the proposed provision, which suggests off-site parking will be required for the ancillary uses to operate;
- The closure of Oxford Road before a match for 30 mins is unlikely to capture most supporters arriving on foot and it is considered that the pre-match assessment should be extended to include earlier periods. This should include the highway impact assessment;
- The TA indicates that 74 additional buses for the P&Rs and 8 additional trains will be required to support the stadium proposals but it is unclear whether this significant undertaking is achievable or is supported by the operators and how it will be funded/guaranteed; and
- Junction modelling would be required to understand the local impacts at junctions that are subject to the greatest changes in traffic flows, because of the new stadium proposals.

CPRE Oxfordshire ask the Planning committee to note the findings of this report and require the applicant to undertake further transport impact analysis as detailed above to fully understand the transport impacts on the neighbouring communities, the supporters, and ancillary users of the stadium prior to any decision.

A Green barrier between Oxford City and Kidlington

CPRE Oxfordshire wish to comment on the significance of this site in protecting the green barrier between Kidlington and Oxford City. We have undertaken a review of the historical reasons why this site was originally bought by OCC some 90 years ago, as we feel that this purchase, in order to protect green space and provide amenities to local residents, remains as true today as it did at the time of purchase and has not been transparently communicated to the Planning Committee or indeed members of Oxfordshire County Council.



Why Did Oxfordshire County Council buy Stratfield Brake in 1937? Their reasons remain relevant

In the 1930's, there was a large amount of ribbon development alongside trunk roads in the UK. A large program of road improvements meant that these roads had been widened and straightened or in some cases newly constructed. It was much cheaper for property developers to build alongside these roads and avoid having to pay for more infrastructure. The result can be seen in many parts of the country including Kidlington where the Oxford Road was improved and hundreds of new houses were built alongside it.

To prevent this sort of development, which had created much urban sprawl outside town and villages, the Government introduced the Prevention of Ribbon Development Act 1936. This Act gave local authorities considerable powers to prevent development alongside roads and gave them powers to purchase land to preserve green areas thereby preventing sprawl.

In the mid 1930' s, the Earl of Dudley, who at that time owned Stratfield Farm and land at Gosford Hill, produced plans to build large housing developments on both sites. Oxfordshire County Council led by the Earl of Macclesfield were against more development at the Southern end of Kidlington as they could see there was a real danger that Kidlington and Oxford would coalesce. With the 1936 Act, the County Council was able to take some action to prevent this happening. The Prevention of Ribbon Development Sub-Committee of Oxfordshire County Council ("OCC") decided to advise OCC to acquire the land at Stratfield Brake and pay the Earl of Dudley the compensation provided for in the Act. The Oxford Times from 13 November 1936 contains a report of the Town Planning Committee meeting which states:

"The Committee has considered the recommendation referred to above that 90 acres of land near Stratfield Brake should be acquired by the County Council for the purpose of preserving amenities. It was advised that the purchase price was £7,450 and that other costs would amount to £350. The Council recommended that if the owner would sell, the Council should buy the land for not over £7,450, subject to the approval of the District Valuer, and that sanction to the raising of a loan of £7,800 be sought."

At that time Stratfield Brake was a continuous piece of land running alongside the Oxford- Banbury Road. The minutes of the Restriction of Ribbon Development Act sub- committee from 1 October 1936 (which was the basis of the decision to buy Stratfield Brake) contains a more detailed description of the land which was purchased by the County Council on 26 August 1937. The price paid which appears to have been £7,450 would in today's values be about £600,000. By way of context new houses were being sold for £700 on the adjacent estates at this time. From that time onwards until the present planning application, Stratfield Brake has been managed as intended to preserve the amenities of the surrounding area. The Woodland Trust lease is about 46 acres and much of the rest is let to Cherwell District Council as playing fields. The part of the site on the South side of Frieze Way, when this was later built, has effectively been used for nature conservation. This area contains the piece of land which is subject to the present planning application and which is known as the Triangle.

It is curious that the County Council having spent a considerable amount to acquire the land at Stratfield Brake and having kept to its policy of keeping the land as a green buffer between Oxford and Kidlington should decide behind closed doors and without any proper public consultation to agree to sell part of the site to Oxford United Football Club ("OUFC") for commercial development. Whilst the amount of any payment received for the land has been kept secret it is common knowledge that it will not amount to anything like the cost of any alternative site in the Oxford Area. What should also have been made clearer to Cabinet member Councillors before making their decision was that the purchase of Stratfield Brake by OCC was intended to create a green



barrier between Oxford and Kidlington. This remains the policy today. It was not as has been suggested by OUFC something that is just a hangover from the time the Green Belt was set up, which did not in fact occur until after the War, but a deliberate decision by OCC to protect the land from development which incurred it in substantial expense at the time.

Waste water drainage

There is next to no information in the papers submitted by OUFC in relation to how it is expecting to deal with the issue of sewage. Although the ultimate responsibility for providing this off-site would be for Thames Water, OUFC will need to show that there is a suitable connection for this to happen and adequate means of storing sewage on site. It is also within the Council's legal responsibilities to ensure that there will be adequate foul water drainage provided at the planning stage and that Thames Water has the means to provide the facilities needed (which in this case seems unlikely in the short term). What is Thames Water's position and that of the Environment Agency. It is clearly premature to consider this application without having this in place.

We are concerned that without adequate safeguards in place, sewage discharge into the streams around the stadium will be a serious problem.

CPRE Oxfordshire ask the Planning committee to take due consideration of their concerns and seek further analysis in these areas. We would welcome the opportunity to meet to discuss our views should this be helpful.

Yours faithfully,

John Hill On behalf of CPRE Oxfordshire