

Oxfordshire County Council owned land at Stratfield Brake, Kidlington

Proposal to enter into negotiations on a possible lease of the land to Oxfordshire United Football Club

Joint Consultation response from Kidlington Development Watch, The Campaign to Protect Rural England Oxfordshire and the Harbord Road Area Residents' Association.

22nd February 2022.

Kidlington Development Watch (KDW) is a voluntary not for profit residents group formed in 2015 to help protect the Green Belt and raise public awareness of planning issues. For more information please visit: <https://www.kidlingtondw.org>

The Campaign to Protect Rural England Oxfordshire (CPRE Oxfordshire) works to improve, protect and preserve the landscape of Oxfordshire and its towns and villages for the benefit of everyone. It is an independent environmental charity, part of a nationwide network of county branches and regions. For more information visit: <https://www.cpreoxon.org.uk>

Harbord Road Area Residents' Association (HRARA) is a not for profit residents group. For more information please visit <https://hrara.jimdofree.com/>

We urge the Cabinet to decline to enter into negotiations as requested by Oxford United Football Club (OUFC). Oxfordshire County Council (OCC) should not consider enabling the use of the Green Belt land that it owns at Stratfield Brake for the development of a new football stadium and associated development, subject to planning permission.

We understand that this proposal was originally actively considered by the previous County administration and its officers have been working on it for some time. The potential conflict of interest is deeply concerning. It is difficult to be convinced that naming different senior officers to act for the County Council (as lease holder) to those acting for Cherwell DC (as planning authority) can provide sufficiently convincing and robust ethical safeguards. Any suggestion of collusion or that this is a 'done deal' can only further erode public trust in the transparency and impartiality of the planning system. The OUFC proposal has very major implications for communities, infrastructure and sport facility provision. Any proposals for the release of further Green Belt in the Kidlington Gap would be better considered in the context of the ongoing Cherwell Local Plan process.

We don't know whether Cherwell District Council have been approached or if they have given any indication that they will look favourably on this. However, in 2017 they ruled out a similar proposal at a very early stage. Since then, their Local Plan Partial Review has been adopted (resulting in the huge development allocations on the map below). The Planning Inspector stated that there were now strong, defensible boundaries to the Green Belt. The planning arguments against development are now, therefore, even stronger.

We consider the Officers recommendation to be deeply flawed and misleading in several respects. It is clear that any proposal by OUFC cannot be consistent with the Oxfordshire Fair Deal Alliance's priorities or with Green Belt planning policy. We are very concerned by the apparent assumption that the Oxford Green Belt, may be surrendered piece by piece as ad hoc development, and financial, opportunities present themselves. The special 'protected' planning status of the Green Belt should be a treasured asset. Proposing its loss is not – as the officers suggest, merely “a challenge in terms of

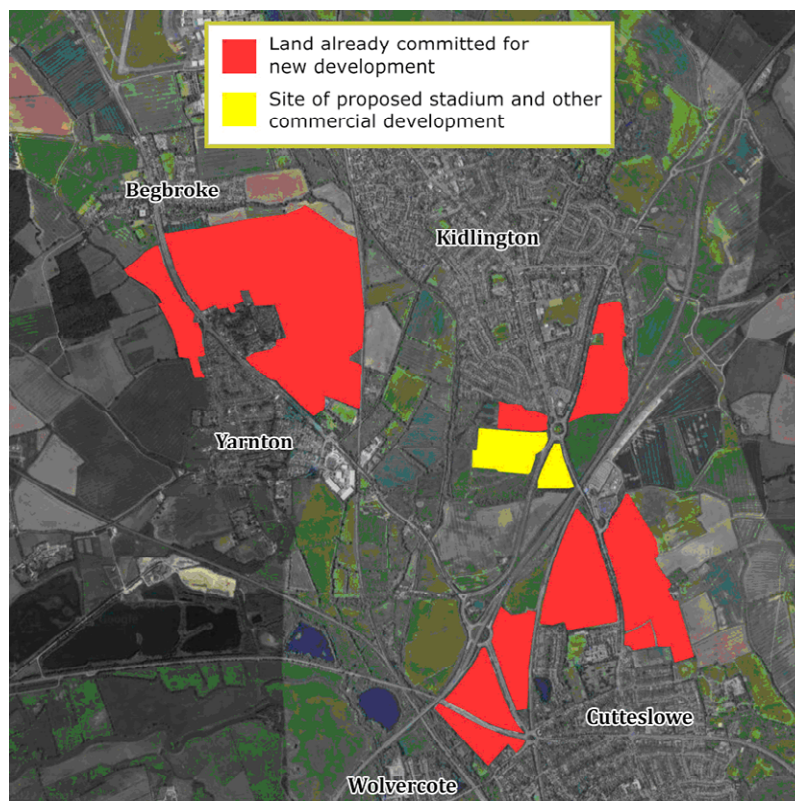
National Planning Policy and political perception” that can be managed if they simply “carefully coordinate media communications”.

The proposal does not meet the Council’s stated six objectives

1) maintain a green barrier between Oxford and Kidlington and improve access to nature and green spaces

OCC should not consider supporting development on OCC owned land that is located within the Green Belt. The loss of even more Green Belt would be contrary to National Planning Policy. Local residents have made it clear that any support given to the development of Green Belt is politically divisive.

The Stratfield Brake site was originally bought by the County Council to protect it and the ‘Kidlington Gap’. The aerial photo below shows the area of land subject to the proposal. The proposed site is in yellow, right at the narrowest part of the remains of the ‘Kidlington Gap’. The red areas are the Green Belt sites already allocated for housing development by Cherwell Council and the massive Oxford North commercial development within Oxford City Council area.



Stratfield Brake is now a vital piece of land to prevent the ‘coalescence of the settlements’. The majority of the sites in red are already at the development brief stage (or beyond). It is safe to assume that they will be built on, almost certainly before the stadium would come forward.

The officers state that they would make an effort “to identify additional land at Stratfield Brake that could be purchased by OCC to maintain a strategic green belt gap”. This is nonsense. The Green Belt in the sensitive strategic Kidlington Gap is the last remaining, critical piece. If funds are available for compulsory purchase then it would be better to apply these to preserving the existing Kassam

stadium. Let us be clear that the proposed Stadium and commercial facilities would present an existential threat to the Green Belt in this area.

- An 18,000 capacity stadium would be a very large dominating structure, possibly as high as a 7 storey block of flats. We can expect noise and light pollution (which could be every weekend of the football season) plus other large events, including noisy late night concerts. It would be completely out of place with low rise houses and nature reserves around it. This is NOT appropriate Green Belt development.
- It is understood that OUFC request that the remainder of the OCC land not utilised for the Stadium may be sublet as a whole or in parts by the corporate entity of OUFC, at a market rent to operators providing commercial and leisure facilities such as retail, hotel and conference facilities. The revenue from these is required to fund the construction of the Stadium. This is a common sports stadium business model. Hence the proposal to build the stadium requires an understanding that planning approval would also be given for extensive retail and commercial development at Stratfield Brake.

This cannot be considered an appropriate use of Green Belt.

- Stratfield Brake is important to Kidlington's residents for mental health and well-being as it provides access to a natural environment and open spaces and also opportunities for exercise. The stadium and associated development would have a major impact on biodiversity and the wildlife at the adjacent Woodland Trust Nature Reserve. The Nature Reserve cannot be considered in isolation, the area around it is important foraging habitat. There would also be a major impact on the area's tranquility and enjoyment by visitors.

2) enhance facilities for local sports groups and on-going financial support;

The land at Stratfield Brake is in public ownership. We understand that the maintenance of the current public facilities is a drain on the Parish Council and Cherwell. However, if it is given over to OUFC, the County would have little control over how it is managed. That is short sighted and wrong. It is proposed that OUFC would be responsible, under a 250 year lease, for funding community sport facilities equivalent to those which will be lost. How will the County enforce this? Likely – as happened with Kassam - the club and its overseas investors will demand more and more planning concessions to increase the commercial value and retail turnover of the complex and their profit. Local sports groups could be squeezed out.

If the worst did happen and OUFC ended up insolvent, which is not by any means an impossibility, the ongoing cost to the Councils could be far more than it is now and in practice it would be extremely difficult to find another club to take over the lease.

3) significantly improve the infrastructure connectivity in this location, improving public transport to reduce the need for car travel in so far as possible, and to improve sustainable transport through increased walking, cycling and rail use

- It would be just as easy and much more sustainable to improve the public transport options at Kassam. Indeed, we understand measures to do this (such as the reopening of the Cowley Branch line and the park and ride proposed as part of the Grenoble Road development site are already planned in the area).
- The proposed stadium retail, leisure, hotel and commercial development would increase local traffic. Traffic in the area is already set to increase hugely as a result of large-scale development in

the area (4,400 homes as well as Oxford North's 4,500 jobs and 480 homes). During the Local Plan (partial review) this was raised by residents as a significant concern. A stadium and commercial development at Stratfield Brake will create further pressure on the transport network and increase congestion in the area.

- Little parking is proposed on site. Fans coming by car would be told to use the Park & Rides. In practice many would park on local streets and be prepared to walk a long way to avoid parking charges and congestion around the stadium. Residents only parking zones & yellow lines would need to be introduced over a very wide area to control street parking. In which case, residents could have to pay an annual fee to park outside their home.

4) develop local employment opportunities in Oxfordshire;

- This area has almost full employment. It is already set to 'benefit' from new jobs, hotels and retail outlets thanks to other developments such as Oxford North and at Langford Lane (with Begbroke & Yarnton to come). Moving the stadium is likely to cause job losses at the existing stadium and surrounding area, in a location where they are arguably more needed. If the club has to move (as is threatened) out of the county then this will have no impact on existing Kidlington and North Oxford local employment opportunities.

5) increase education and innovation through the provision of a sports centre of excellence and facilities linked to elite sport, community sport, health and wellbeing;

- Elite sport is not needed to encourage community sport, health and wellbeing. Stratfield Brake is already good for this. Local sporting facilities could be improved without building the stadium and all the unnecessary associated development which is only there to fund the stadium.

6) support OCC's net zero carbon emissions pledge through high sustainable development

- This is nonsense. All our councils have declared a climate emergency. It is absolutely not sustainable to demolish a recently built stadium and commercial area and replace it with another in a different place.
- With the possible exception of the Forest Green Rovers new stadium near Stroud, football stadiums do not achieve net zero carbon.

Other objectives

The primary objective should be to ensure that Stratfield Brake remains part of the Green Belt and that any proposals for enhancing it comply fully with the recently adopted Cherwell Local Plan.

The land at Stratfield Brake is in public ownership to protect it from development. The only way this proposal is likely to go ahead is if the County give away almost all of the massive potential development value of the land if it is released from Green Belt. How can they be sure the promised benefits will outweigh the direct financial opportunity loss? Should the Council allow overseas developers to benefit from the disposal of publicly owned land? It should not just be assumed that the potential investors are on board for their love of football. At least one of them has already invested in a stadium project, selling out after its completion to realise a substantial profit. It is

difficult to see how OUFC's proposals can be financially viable unless OCC agree to transfer the lease at significantly less than the commercial value of the land.

However, OUFC's request makes clear their intention to sublet the OCC land not utilised for the Stadium "as a whole or in parts by the corporate entity of OUFC, at a market rent to operators providing commercial and leisure facilities such as retail, hotel and conference facilities". The intention is to maximise footfall and income outside of match days. All of this associated development is unsuitable for Green Belt and would never be contemplated in its own right.

We sympathise with OUFC's difficult position and relationship with the current owner of the Kassam Stadium. Given the massive costs – and long lead time to deliver a new stadium complex – why not invest more effort into sorting out the problems at the current stadium? Refurbishing it and putting it onto a better financial footing seems a much more sensible and sustainable (environmentally and financially) option. However, this is obviously not as attractive an investment opportunity for the new financial backers.

We believe that OUFC is using the 'deadline' for it to leave Kassam as a means of creating illusory time pressure on all parties to act with undue haste and reduce the time allowed for considered thought. Even if they succeed with their timeline it is extremely doubtful, particularly given the level of local opposition, that this proposal will progress smoothly within the timescale imagined. OUFC should therefore make alternative interim arrangements anyway.

Oxfordshire County Council needs time to fully consider the impact of removing this site from Green Belt. The stadium proposal has been bought forward as a commercial proposal with an emotional appeal to 'help save the club'. This should be resisted. The purported benefits, impact on infrastructure and negative effects have not been considered via the Cherwell Local Plan process. We are not convinced that other options such as: alternative brown field sites; supporting the renovation and improvements to the existing stadium; and ground sharing have been properly considered.

This problem belongs to Oxford City Council. That Council clearly did not carry out due diligence in the negotiations on the Kassam Stadium – or Oxford United would not be in their current predicament. The City Council could - and should - do more to help solve OUFC's current stadium problems. Instead it seems content to shunt the issue out into the surrounding Green Belt and impose on unwilling communities. We believe that the best and most constructive response Oxfordshire County Council can make is to decline to enter into negotiations with OUFC over the release of Stratfield Brake. It should encourage Oxford City Council to put every effort into seeking to ensure the club enjoys a viable future at the Kassam site. Cabinet should make it very clear that the land at Stratfield Brake is not available for commercial development.