

**Application no: 24/00539/F**

**Location:** Land To The East Of Stratfield Brake And West Of Oxford Parkway  
Railway Station Oxford Road Kidlington

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## **Transport Development Management**

### **Detailed Comments:**

These comments have been provided to address the points raised by Mayer Brown's Transport Technical Note Report (TTN) dated 15<sup>th</sup> July on behalf of Kidlington Parish Council. Oxfordshire County Council (OCC) acting as the Local Highway Authority (LHA) has engaged with the applicant along with multiple stakeholders throughout the planning process and has thoroughly assessed the proposed new stadium development. As such the recommendation of no objection subject to planning conditions and planning obligations is maintained.

The comments provided below have considered the points raised in the Mayer Brown TTN. For assistance they are presented in the same order as Table 3.1 in the TTN.

**Item 1. (Paragraphs 3.4, 3.6 & 3.7) Proposed stadium parking proposals are likely to result in a significant shortfall of car parking for supporters during match days** – This has been considered and addressed within the formal OCC response dated 30<sup>th</sup> May 2025 (pages 16 & 25). Parking surveys have been undertaken for all P&R's (Transport Assessment Addendum December 24, page 93), plus the council's own exercise, adding in the expected increased occupation when the Traffic Filters trial starts. This demonstrates there is sufficient existing capacity and does not include the new P&R at Oxford Airport which will increase parking capacity in the area by an additional 1000 spaces in 2030/2031. Mayer Brown again state that that P&R's are for city centre use but as stated in the OCC response dated 30<sup>th</sup> May (page 16), there is no policy wording that stipulates P&R's are for city centre use only. There should not be an economic impact on the city as there is spare capacity at the P&R's which can be used by supporters without removing space for other users.

As for Mayer Browns argument that the P&R's are essentially remote car parks for the stadium and are against policy, due to the sustainability of the site there is a lower vehicular trip rate than the existing stadium (Scenario 3 + Parkway). This already means there is a reduction in vehicular trips across the network on match days but it also should be made clear that despite the proximity of the stadium to the P&R's, they are acting exactly as intended, allowing users to transition from car to other modes of transport (walking, cycling and bus). Officers consider the assessment that has been undertaken to be robust and acceptable.

A Controlled Parking Zone (CPZ) funded by the applicant will be introduced within a 2km radius of the stadium (with a further 1km zone if required) to prohibit any 'ad-

hoc' parking on residential streets. This approach has been modelled, analysed and is deemed acceptable. The applicant will fund the matchday CPZ's through S106 contributions, Oxfordshire County Council will then design and implement the scheme. S106 contributions are also sought for additional enforcement, however, this is also funded by the cost of permits and through parking tickets. The county council currently operate matchday CPZ's around the existing stadium so do not have any concerns regarding its effectiveness.

**Item 2. (Paragraphs 3.9, 3.10 & 3.11) The vehicle mode share has been based on a GIS assessment, which could be underestimating the mode share and parking demand for supporters** - The methodology has been agreed by Oxfordshire County Council and National Highways via the pre-application and planning application process. The GIS analysis is based on the postcode ticket data provided by the club and the use of TravelTime to determine travel times or isochrones to estimate how supporters might travel to the stadium. The proposed stadium benefits from a wide range of travel choices. Discussions with public transport operators have been undertaken throughout the development of the strategy and support by them has been made evident.

Mayer Brown are essentially advocating the use of a 'Predict & Provide' approach, stating that due to a fan survey (not a matchday survey which is an important point of difference) showing that 85% of fans travel by car to the existing stadium that the assessment for the proposed stadium needs to provide for similar patterns of traffic generation.

This approach is not considered appropriate as national and local guidance (TRICS Decide and Provide Guidance, OCC's adopted Implementing Decide & Provide, OCC Local Transport & Connectivity Plan) encourages moving away from this methodology towards a 'Decide & Provide' approach. This essentially means traffic modelling different scenarios using a variety of methods including Travel Plans to improve active travel infrastructure and public transport initiatives instead of highway capacity improvements.

As detailed in the formal OCC response dated 30<sup>th</sup> May 2025, the proposed site and its location is vastly different from the existing stadium in terms of connectivity. This allows for a reduction in vehicular trips and provides more opportunities for people to travel sustainably to the site via the proposed mitigation package (highway works, financial contributions and planning conditions) that is being provided.

The submitted TTN also mentions the mode share target within the Travel Plan being too low; however, it is important to note that that this document is only a draft and its subsequent targets will be updated within the final Travel Plan (to be secured by planning condition). For the avoidance of doubt the mode split that has been used to inform the traffic assessment is from the Transport Assessment (TA) and not the target within the draft Travel Plan document.

**Item 3. (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 – As discussed previously there is sufficient capacity at the P&R's (TA Addendum Dec 24,**

page 93) which will be increased further in 2030/2031 when the new P&R at Oxford Airport is operational. OCC have undertaken our own exercise on future demand and can confirm there is still sufficient capacity.

**Item 4. (Paragraph 3.5) The car parking requirements for the stadium ancillary uses have not been met by the proposed provision** – The parking provision for the ancillary uses is in line with the adopted Oxfordshire County Council Parking Standards for New Developments guidance and is considered adequate outside of matchdays. On matchdays on-site parking will be reserved for stadium use only (primarily as disabled bays). With Peartree and Oxford Parkway P&R's which both have sufficient available capacity within walking/cycling distance this approach is considered acceptable.

**Item 5. (Paragraphs 3.12, 3.13, 3.14, 3.15, 3.16 & 3.17) The closure of Oxford Road before a match for 30 mins is unlikely to capture the majority of supporters arriving on foot and it is considered that the pre-match assessment should be extended to include earlier periods** – Mayer Brown have stated that they do not think 5 minutes is sufficient for setting up/taking down the Hostile Vehicle Mitigation. The county council's Network Management team (and TVP) have been consulted on the proposed match day arrangements and considered what is proposed to be acceptable based on their considerable experience with traffic and event management. The road closure is required for the people expected to arrive/leave in the 35 minute period before and after matches, if some fans decide to arrive early/leave later this is likely to reduce the road closure time, not extend it. The new footway/cycleways planned for Frieze Way and Oxford Road are sufficiently wide enough to facilitate a large number of pedestrians. This approach will be monitored and reviewed by all parties when the new stadium is in operation. Further details will be provided via the Crowd & Traffic Management Strategy condition.

Mayer Brown have also questioned the use of the Tottenham stadium as an example in the submitted TA stating that it has *“significantly better public transport infrastructure with multiple rail stations and much larger volumes of bus services.”*. This is noted, however there is no acknowledgement from Mayer Brown of the sustainability benefits of the proposed site that has easy access to multiple P&R's and a train station within a close proximity as well as planned high quality active and public transport routes with frequent bus services. The Mayer Brown TTN does acknowledge the Tottenham stadium is larger than the proposed stadium (four times the size) meaning that local road closures around the Tottenham stadium must be managed differently, i.e. Tottenham have permission to close the roads for longer periods (60 minutes) due the higher footfall of supporters on match days. However, when speaking to Tottenham they confirmed that despite having permission to close High Road for 60 minutes, on average it only requires a 30-minute closure.

The pedestrian modelling for the new stadium shows the requirement for a 35-minute closure with 5 minutes each side for set up/takedown. The methodology for the pedestrian modelling is considered acceptable and OCC has seen no evidence to believe the data provided is not accurate. On this basis, OCC does not believe that extending the modelled period to 60 minutes is required. However, the match

day management of road closures and general traffic management will be monitored and reviewed by all parties when the new stadium is in operation.

**Item 6. (Paragraphs 3.18, 3.19, 3.20, 3.21 & 3.22) 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** – Oxford Bus Company and Stagecoach have been involved in the Transport Working Group and the workshops which have taken place throughout the application and pre-application process. They have confirmed they are supportive of the scheme and the transport strategy – there will be a private agreement between Oxford United and a bus operator for the match day services and shuttle buses (as there is currently) – these will be monitored and reviewed as part of the Matchday Steering Group in the Section 106 agreement. Financial contributions are sought to further improve existing services and to help bring forward the Cowley Branch Line and Oxford Airport P&R.

Chiltern Railways have now confirmed that sufficient rolling stock is available to cater for the expected demand on the Oxford-London Marylebone line, including the proposed stadium. Oxfordshire County Council have been in discussion with Chiltern Railways throughout the process and have been expecting this announcement for some time, if the announcement had not come before planning committee and planning permission was granted it would have needed to be subject to the increase in rolling stock by DfT.

**Item 7. (Paragraphs 3.2, 3.3, 3.23, 3.24, 3.25, 3.26 3.27, 3.28 & 3.29) Junction modelling would be required to understand the local impacts at junctions that are subject to the greatest changes in traffic flows, as a result of the new stadium proposals.** - Oxfordshire County Council consider that the junction modelling aspect of the TA has sufficiently been covered within the formal response dated 30<sup>th</sup> May 2025. The Mayer Brown TTN suggests there will be 43 events per year including women's games which will require a road closure. Women's games are played on Sundays when background traffic is considered to be significantly lower, and the visiting crowds are unlikely to require the road to be closed. There are on average 28 men's home games a season including cup games, on average only 6 of these are weekday evenings when the micro-simulation model shows the biggest impact. Mayer Brown also state that the road closure should be modelled for 60 minutes – this is not supported by evidence or advice and as such the 45 minute period is considered acceptable.

Mayer Brown have stated that local junction modelling should be used alongside micro-simulation modelling (VISSIM). However, this has not been the standard approach in this area, for example the Cherwell Partial Review (PR) sites did not use junction models and only used a micro-simulation model. This is because micro-simulation models are much better at showing the interaction between the junctions and in this area with a number of challenging junctions within close proximity to one another it was considered that a VISSIM model would better show the impact and provide a more robust assessment.

Throughout the development of the transport assessment and strategy OCC, NH, CDC, and their respective consultants have been included within discussions and

key decisions for the proposed stadium. The modelling methodology was requested by OCC with their consultants. Pell Frischmann, OCC's independent consultant, has undertaken a thorough review of the base model and forecast modelling scenarios and where applicable has requested model updates or additional scenarios, which Ridge has undertaken. The outputs have been presented in additional documentation and subsequently approved by OCC and NH.

The VISSIM model provides greater accuracy with regards to the effect of road closures and the interaction of junctions in close proximity. Junction modelling can be a useful tool assessing single junctions but in this area, where there are multiple junctions and signalised crossings all connecting it was deemed more beneficial to be able to assess the impact using micro-simulation modelling that captures the interface and performance of multiple junctions together.

Mayer Brown have stated that queues will be 1.2km long but have not given any context how this is derived. The queue that has been identified is only shown in 1 scenario (Saturday 12:30 kick-off with Parkway), however, examination of the corresponding journey time data shows there is only a 4 minute and 22 second delay across the route which is approximately 8km, an average delay per kilometre of 53 seconds. In that hour period across the whole modelled network there is an average delay per vehicle of 41.1 seconds. Queue lengths are not always considered the best indicator of traffic impact, especially in an area where a number of junctions interact with each other and where there are a large number of signals.

The 1.2km queue which is on Banbury Road northbound, is the longest queue shown within the model but there are also shorter queues shown on the A40 westbound between Cutteslowe and Wolvercote roundabouts and on Frieze Way southbound. The queues are only present before matches and last approximately 60 minutes. However, the journey time delays not being significant (generally, although there are localised delays) indicate that these are not static queues (i.e. are rolling queues), this means there is unlikely to be significant blocking of junctions or driveways.

Mayer Brown state that a number of “favourable assumptions” are included in the model to show there will be a higher reduction in background traffic. However, OCC disagree with this statement and feel the assessment is robust. For example, the model does not include the Oxford Airport P&R or the Cowley Branch Line which will further reduce background traffic and the need for supporters to drive to Peartree or Parkway. Several of the junctions are also not modelled using MOVA which they do use in reality meaning they are more efficient at clearing traffic than the model shows. It is therefore considered that the approach used to model the transport impact of the new stadium, including all junctions, is robust and acceptable and that the results show that this proposal is in line with paragraph 116 of the NPPF (and paras 115, 117 and 118).

## **Other Matters Identified**

**Core Scenarios (Paragraphs 4.2, 4.3 7 4.4).** – Mayer Brown have stated that the traffic impact of the development should be modelled with a 0% reduction in background traffic rather than the 10-15% which has been used in the model.

However, the applicant has presented substantial evidence to demonstrate that there will likely be a higher percentage of background traffic reduction than 10-15%.

Studies done on Variable Messaging Signs (VMS), which will form a large part of the transport strategy, show on average they reduce traffic by approximately 30% by alerting people of road closures/events so they can choose a different route or not travel during that time. OCC's Network Management team have also confirmed that they reduce traffic significantly when managing events and roadworks etc. The monitoring report for the London Olympics shows a reduction in background traffic of 35% and the applicant has provided information on traffic around Reading stadium on match days which shows it is similar to non-matchdays, meaning there is likely to be a significant reduction in background traffic to accommodate match day traffic. This is supported by surveys on the highway network near the existing Oxford United stadium which show traffic levels similar on match days to non-match days. It should also be noted that once the Oxford Airport P&R, East West Rail and the Cowley Branch Line come forward (all between 2030-2032) background traffic and supporter traffic is likely to see a further reduction. As such it is considered that the 10-15% is robust and is in line with a vision-led approach. As such it is considered that this is acceptable.

**Modelling Sources (Paragraphs 4.5 & 4.6)–** No response required. This was the information we received from Tottenham and when looking through the Tottenham Stadium planning application documents online it does not appear that any micro-simulation modelling has been undertaken or that their road closures have been modelled, however, it does appear that 2 junctions were modelled separately. Regardless of this, whether Tottenham Stadium was modelled or not does not impact the modelling or the assessment for the proposed site.

**Toucan Crossing – Loop Farm Roundabout (Paragraphs 4.7, 4.8, 4.9 & 4.10) –** This crossing is included within the model. It was also included in the A44 Corridor Scheme model but the crossing was removed from the scheme at that time for value engineering reasons.

### **Other Matters raised by Kidlington Parish Council**

**Highway works and other measures requiring land dedication –** all highway works are within the public highway land and will not require any dedication from third party landowners. The exception to this is part of the land required for the steps between Oxford Road and Oxford Parkway which is owned by Chiltern Railways which will be dedicated as public highway land by legal agreement.

**Officer's Name:** Will Madgwick

**Officer's Title:** Technical Lead

**Date:** 11 August 2025

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