



APRIL 2014

# OXFORD STADIUM DRAFT APPRAISAL: PUBLIC CONSULTATION RESPONSES

# CONTENTS

Introduction.....2

Public Consultation.....

Questions and statistical data.....

Summary of responses in favour of designation.....

Summary of responses against designation.....

Table 1.1. Issues raised.....

Table 1.2. Montagu Evans response.....



An aerial view of Oxford Stadium

## Introduction

An appraisal report, assessing the suitability of Oxford Stadium, Sandy Lane for designation as a conservation area was prepared by the City Council and made available for public consultation between the 10<sup>th</sup> March and the 1<sup>st</sup> April 2014.

The architectural and historic interest of the area has already been recognised with the site's inclusion on the Oxford Heritage Asset Register. By research and analysis the appraisal elaborated on the site's *special interest* aiming to provide a more detailed understanding of the stadium's character to inform decisions about its future management

## Public Consultation

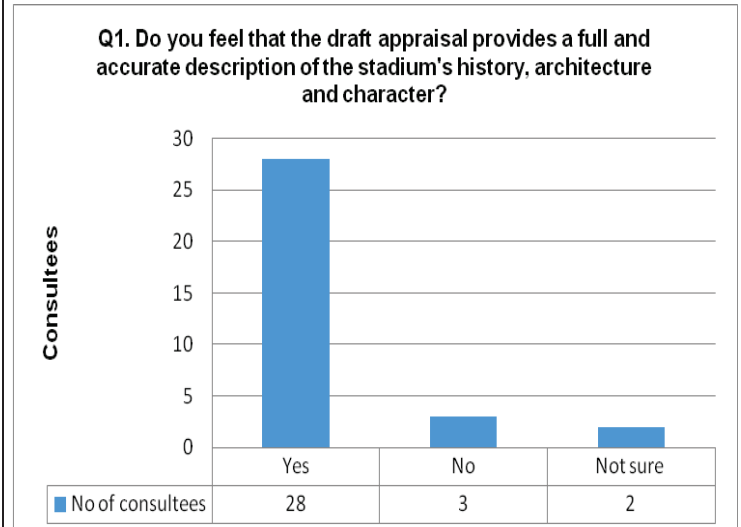
Comments on the findings of the draft appraisal report were invited from interested stakeholders and members of the general public. These were welcomed in the format of an online questionnaire or through writing to the City Council.

Consultees were asked to comment on three key issues:

1. On whether the report provided a full and accurate description of the stadium's history, architecture and character.
2. Whether they felt the conclusions reached in the report justified the stadium's designation as a conservation area.
3. And finally, consultees were invited to provide further detail expounding their position.

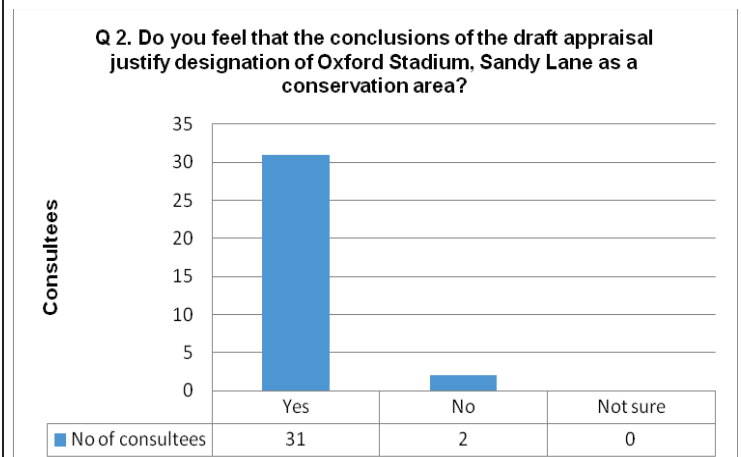
The findings from the online survey have been summarised here.

### Q.1.



Of the 33 consultees who responded to the online questionnaire, 85% felt that the report provided an accurate description of the area, 6% were not sure and a further 9% felt that the report contained some level of inaccuracy. The latter has been addressed in table 1.1.

### Q.2



94% of consultees felt that the conclusions reached by the appraisal provided sufficient justification for the designation of Oxford Stadium as a conservation area. 6% however felt that the site failed to demonstrate sufficient special historical and architectural interest to merit such designation. Their objections have been analysed in greater detail in table 1.2. Written comments have been submitted by post but do not materially change this overall picture. (Total 35 respondents)

---

### Q.3. Summary of responses on favour of designation

- Most consultees in favour of designation agreed that the appraisal is comprehensive and accurately records the history of the area and, commenting on the area's distinctiveness, some have noted that whilst "houses can be built anywhere," the stadium is "a unique piece of history," holding a special character that cannot be replicated anywhere else.
- They emphasise the communal value of stadium, citing its importance for its cultural and social historic value and as "a place that brings people together."
- Consultees further observe that the stadium holds wider significance beyond Cowley and Oxford not only as a piece of local heritage but also as a "national asset" (consultee 266425). It is noted that the stadium has not only "had a long standing connection with Oxfordshire" but that it is also of national and international significance. In particular relation to speedway, the stadium is perceived as the base of a wider international phenomenon.
- To paraphrase consultee 266261: *"the nature of speedways and its support is that of a worldwide 'family' and as with*

*any family, interest is taken in the surroundings and environment of our family members. Hence Oxford Stadium and Oxford as a city venue is revered from as far abroad as Australia and New Zealand, the USA, throughout Europe and the eastern bloc for its current and historic association with international stars and champion speedway riders."*

- Consultees also highlight the extent to which the stadium continues to foster groups, such as those of dance, whose continued cohesion is centred on the stadium.
- The stadium is cited as a significant feature both in the collective memorialisation of sport history in Oxford and in the personal memories of many. Specific stadium buildings are fondly recollected and cited as being quite formative of social identity. Consultee 267573 for instance highlights how "Oxford Stadium was a key part" of his "formative social experiences when growing up in Littlemore in the 1950." He states: *"I went to speedway every week during my teenage years, and started to attend once again when I returned to live in Headington in 2002. My memories are very much of a site that is part of the life and fabric of this area of East Oxford, with the totalisator in particular being a crucial part of the site's heritage"*

- Writing on behalf of the Oxford Stadium Tenant's Group (comprised of the Save Oxford Stadium group; Lightning Motorcycle Training; Karting Oxford; The Oxford Speedways Supporters Club; Dance Connection and a local church group), Kemp & Kemp (property consultants), concur with the conclusions of the draft appraisal noting that Oxford Stadium holds special architectural and historic interest whose character it is desirable to preserve or enhance. They highlight three key points in this regard:

- That the site has special historic interest as evidenced by its designation as a local heritage asset. Historically it has been used for greyhound and speedway racing and served as a sporting venue drawing national and international teams and supporters. That it also has architectural interest. The decline in the number of historic stadia makes it a "rare example nationally of a racing facility." English Heritage guidance recognises the varying nature of conservation areas and that the special character of these areas does not derive solely from the quality of the buildings.
- That the stadium "poses a character and appearance that stems from its historic and architectural interest." It "provides a venue for sporting events which have been attended by local people over the past seventy years." There are "strong associations between this historic sporting and both local community and wider city of Oxford."
- They conclude that "in taking the first and second points into consideration, it is clear that the established character and appearance of the site, which stem from the historic links with the local

community's interest in greyhound and speedway racing, are worth of preservation."

---

### Q.3. Summary of responses against designation

- Objections to the designation of Oxford Stadium were made by two key parties; *Greyt Exploitations* – a non-profit organisation that raises awareness against the exploitation of greyhounds and *Montagu Evans* on behalf of *Galliard Homes* and *GRA Acquisition Limited* – the freehold owner of Oxford Greyhound Stadium.
- The following key points (further addressed in table 1.1. & 1.2 were highlighted:
  - That the report contained inaccuracies in the form of outdated information that presented a biased appraisal. (Some of these relate to reports on greyhound racing released at the time of writing and during the appraisal consultation period).
  - That the stadium is not an area for the purposes of Section 69 (1) of the Act.
  - That the stadium has no positive visual qualities and does not have a character and appearance that is desirable to preserve AND
  - That although it is a detailed appraisal, the approach is "seriously deficient, does not reflect best practice and is not a sound basis for designation."

**Table 1.1 Issues raised**

Response Id	Question:3 If you would like to make any comments on the draft conservation area appraisal please post them here....	OCC Response	OCC Action
267333	Whilst referring to the Stadium's context as a greyhound racing venue, the appraisal should not overlook its equally significant historical role as the home of speedway racing in the city from 1939 to 2006. I am one of surely many thousands across the country who fondly recall visiting Oxford to attend speedway racing over the years, and who yearn for the chance one day again to come back.	The importance of speedway to the history and significance of Oxford Stadium is identified. However, whilst there is much information about speedway events and the people associated with the sport there is little documentary evidence to explain the sport's impact on and relationship to the buildings and structures on the site. Further research and interviews would be necessary to illicit further evidence. The appraisal provides sufficient information to understand the buildings on the site that are associated with the sport and to understand significance	No further action required
268536	The comments do not include any mention of Speedway. When you consider that every World Speedway Champion since the resumption of speedway in 1949, has ridden at Sandy Lane including the current 2013 World Champion Tia Woffinden. I feel the historic value is understated. Likewise with greyhound racing some of the iconic greyhounds and trainers have patronised Oxford Stadium over the seven decades it has been open.	See above.  References are made to speedway events, however, there is a limit to the amount of detail about individual events and people that should be included, particularly as there is other published material devoted to the subject	Include bibliography in Appraisal to reference other sources of information on Speedway and Greyhound Racing
269010	Most occurrences of the word "speedways" in the Oxford Stadium draft appraisal should be replaced with "speedway" singular!	noted	Correct 'Speedways' to 'Speedway'
268974 Greyt Exploitation s	The draft appraisal contains inaccuracies - outdated information that in turn presents a biased appraisal:  1. Greyhound racing is not a sport. For an activity to be recognised as a sport in the UK, its status must be agreed by each of the four home country sports councils and UK sport.  2. There is no track named Sutherland.  3. There are now 24 tracks remaining with the closing of Coventry in February.  4. The report cites the GBGB report	1. It is widely regarded as a spectator sport, and is referred to as a sport in English Heritage's publication on Sports and Recreation Buildings (2012)  2. This is a typographical error and should read Sunderland  3. Noted  4. The GBGB report was the most	1. No further action required  2. Correct 'Sutherland' to 'Sunderland'  3. Add comment that Coventry closed in 2014 and no. of stadia has reduced still

	stating that greyhound racing is the second most attended spectator sport, a new report on the economic impact of British greyhound racing published on the 8 <sup>th</sup> of March 2014 shows that it was Britain's " fifth best sport" in 2012. Requests the appraisal is updated.	industry report at the time of writing the appraisal.	further to 24. 4. Latest industry report to be referred to. Including reference to popularity
--	---	---	--

**Table 1.2 Montagu Evans (Consultation Response Report 28 March 2014)**

A document was prepared by Montagu Evans LLP on behalf of Galliard Homes and GRA Acquisition Ltd as part of their response to the Oxford Stadium consultation. It states in summary that the Council's use of Section 69 (1) Planning (Listed Buildings and Conservation Areas) Act 1990 "plainly goes against the intention of that provision" and is contrary to the Secretary of State's policy in the NPPF). It further concludes that the appraisal's "approach is seriously deficient, does not reflect best practice and is not a sound basis for designation."

Part of the response also included a Heritage Assessment (11 April 2013) and an Individual Structures Assessment (Oct 2013). These documents were consulted during the course of conducting the appraisal research and the resultant conservation area appraisal identifies further evidence— particularly relating to the area's architectural and communal significance — that had not been discussed in the 2013 reports. Montagu Evans observed in their consultation response that they "have no issues with the facts in the Oxford Stadium Conservation Area Appraisal".

A summary of the issues raised are outlined in the table below

No	Objection	OCC Response	OCC Action
1	The stadium is not an AREA but a Building. "The stadium comprises of a number of interdependent structures, enclosed by a single boundary. It is not an area as defined by statute and planning policy but a single building complex. The Planning (Listed Buildings and Conservation Areas) Act 1990 "makes a clear distinction between buildings and area providing a separate provision for each." The definition of a listed building (Section 5 of the Act), in particular the definition of curtilage, "is relevant to Oxford Stadium. The grandstand is the main building on the site, the curtilage of the site is formed by the site boundary and the smaller structures are ancillary curtilage structures."	Disagree. EH advice does not define how large or small an area should be but does suggest it can cover part of a settlement, an open area or a spatial element.  S5 of the Act refers to listed buildings the purpose of which is to establish the extent of a listing and does not apply to conservation areas. This is a proposed conservation area to which a different statutory provision applies.	No further action required

2	<p>“The character and appearance of the Stadium is not desirable to enhance, as required by statute and planning policy. It is plainly not attractive. Large areas are given over to hardstanding, and the largest structure on the site, a recent (c.2000) stadium (sic.), has no architectural or historic merit.”</p>	<p>The appraisal concludes that the area holds special architectural or historic interest. This is not determinant on its ‘attractiveness’ as may be perceived by particular groups.</p> <p>If the council considers that it is desirable to preserve or enhance this character and appearance then the requirements of the Act are met.</p>	No further action required
3	<p>The conservation area appraisal is seriously deficient, does not reflect best practice and does not provide a sound basis for designation.</p>	<p>Disagree. Preparation of the appraisal has followed English Heritage published good practice advice. It provides the necessary evidence to allow the Council to make a decision. See also 9. below</p>	No further action required
4	<p>“Notwithstanding our firm view that the site is not an area as intended by Section 69 (1), there is the question of quality and interest and planning policy addresses that emphatically. NPPF requires that local planning authorities should only designate conservation areas that warrant it...in our judgement the proposals to designate go against the clear policy set out in the NPPF, a policy which in its wording plainly exists to ensure that section 69 powers are only used where an area merits designation.”</p>	<p>Disagree.</p> <p>The statutory provisions are set out elsewhere. Policy (including the NPPF) cannot effect a change in those provisions. Again, as set out elsewhere, regard has been had to the NPPF (esp para 127) and officers are content that designation would be consistent with that and other relevant policy. The decision is one of planning judgement for members.</p>	No further action required
5	<p>Whilst the site holds some of the elements identified by English Heritage (Understanding Place 2011) as part of the definition of special interest “e.g. its history has been recognised as locally important”, “the designation of a site must also be based on some positive visual qualities.</p> <p>The stadium in our expert opinion, lacks any positive visual qualities desirable to preserve and enhance</p>	<p>Disagree. The area does hold positive visual qualities as explained in the appraisal. The rudimentary nature of some of the buildings is part of their interest.</p> <p>The Act makes clear that it is the character OR appearance that it is desirable to preserve or enhance.</p>	No further action required
6	<p>The physical manifestations of the site have no special interest. The stadium is not the earliest example; not associated with any technological advancements in the sport; “the structures on the site have no intrinsic historic value...our research has not produced any evidence to confirm associations between oxford stadium and the Cowley motor industry.”</p> <p>“The use has local associations, but</p>	<p>Disagree. The area holds historic interest associated with the working communities of East Oxford and the development of leisure industries in the first part of the C20th</p> <p>The issue before members is one of planning judgement complying with the criterion of the Act having regard to the material policy and guidance that has been referred to.</p>	No further action required



	the stadium, in our opinion, lacks any positive visual qualities desirable to preserve or enhance.”		
7	“The structures comprising the Oxford Stadium are of no aesthetic value or architectural interest. The design and materials are utilitarian, often of poor construction.”	The structures hold historic interest by virtue of their age and means of construction. See also above	No further action required
8	<p>“The Proposed designation was prompted by a planning application.”</p> <p>“Documents from Oxford’s Local Development Framework indicate that, beyond the update of appraisals for existing conservation areas, there is no programme for the systematic review of conservation areas to identify new areas worthy of protection.”</p> <p>The Heritage of Oxford: A Preliminary Statement....does not mention Oxford Stadium in the section on sport and leisure.</p>	Disagree. Additional information and understanding was made available consequentially to a planning application. Once the Council became aware (via whatever route) that the Area was “of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance” it comes under the statutory duty to designate. There is no exemption on account of that information and understanding being consequential to a planning application. Similarly designation must not be made for the purpose of opposing a planning application. That would be an unlawful ulterior purpose.	No further action required
9	<p>OCC, EH &amp; OPT “have developed a character assessment toolkit” which is “cited in the English Heritage Best Practice guidance on designation, appraisal and management of conservation areas (2011, para 1.11)”</p> <p>“The conservation area appraisal is defective and does not follow national or local best practice.”</p>	<p>Disagree. The toolkit has been used to inform the content of the appraisal as has the advice in English Heritage’s published good practice guidance.</p> <p>The appraisal is not defective and seeks to establish good practice in understanding and valuing our C20th heritage</p>	No further action required
10	“The communal value of greyhound racing has lessened considerable since the Stadium opened in 1939.”	Disagree. EH defines communal value as deriving ‘from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory’. Officers have advised as to the judgement to be made and do not consider that this comment materially affects that consideration.	No further action required
11	“There are currently 25 greyhound tracks in the country so Oxford Stadium is certainly not unique. It is not the only stadium in Oxford: Oxford United Football Stadium on Grenoble Road is south of the city.”	Disagree. Since writing the appraisal another greyhound stadium has closed. There are now only 24. Officers have advised as to the judgement to be made and do not consider that this comment materially affects that consideration.	No further action required