



Oxford Local Plan 2036

Joint Statement of Common Ground: Sport England and Oxford City Council

Parties:

- Oxford City Council
- Sport England

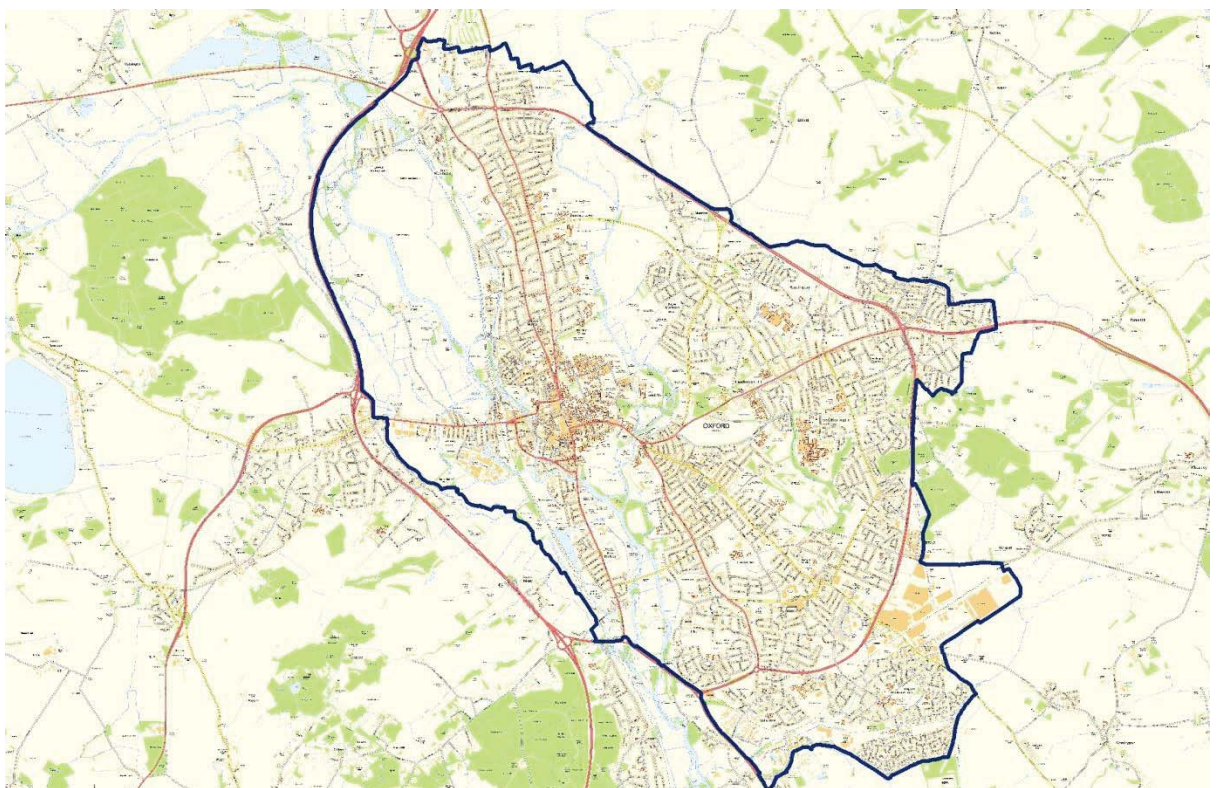
Date: 21 March 2019

Introduction

1. This Statement of Common Ground outlines the matters on which Sport England and Oxford City Council (“the Parties”) have co-operated and provides a written record of the progress made between the two as well as on-going arrangements for co-operation on these matters. Its purpose is to reflect and confirm the current position agreed by the Parties with regard to the Duty to Co-operate and soundness on specific matters.

Location

2. The SoCG spans the Oxford City Council administrative area. This is the area the Oxford Local Plan 2036 applies to.



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List of signatories:

3. The following authorities/agencies are responsible for joint working with regards to addressing this key matter:
 - Oxford City Council
 - Sport England

Governance arrangements for the cooperation process

4. Sport England is on the Steering Group for the Playing Pitch Strategy and has been involved from inception and agreeing of the timetable and methodology. The Planning Policy team is also on the Playing Pitch Strategy steering group and the implications of

the Playing Pitch Strategy and how it fits into the Local Plan have been discussed regularly. The first Steering Group meeting was on 22nd January 2018. Sport England is also a statutory consultee on relevant planning applications.

5. Through regular meetings with Sport England, this statement of common ground will be kept up to date until adoption of the Oxford Local Plan 2036.

Key matters to be addressed

6. Sport England’s remit is to ensure everyone has the opportunity to take part in sport. Their areas of interest in relation to the Plan are policies in Chapter 5, particularly Policy G5: outdoor sports, policies; chapter 8, particularly Policy V7: infrastructure and cultural and community facilities; as well as specific site allocation policies that affect outdoor recreation areas and the Playing Pitch Strategy, which is a key part of the evidence to support the Local Plan.
7. The City Council has been consulting with and involving Sport England in the update to the Playing Pitch Strategy. Sport England is satisfied that the methodology being used for the update is following its latest guidance.
8. At Regulation 19, the initial results of the Playing Pitch Study were not completed. However, initial work had suggested there was unlikely to be a significant difference to the results of the previous study. Therefore, the previous study was used to justify policies to protect sports pitches and the allocation of some sports field sites.
9. Sport England objected to the allocation of these sports field sites at Regulation 19 because of the lack of an up-to-date Playing Pitch Strategy. Since publication significant progress has been made on the Playing Pitch Study; enough to draw conclusions about the demand for pitches. This helped inform a meeting between the City Council and Sport England on 14th February 2019 where the rationale for the policies and site allocations was explained further by the City Council, in the context of the results of the updated Playing Pitch Study. The results of the Playing Pitch Study have been in line with the assumptions made, so help to justify the site allocations.

The initial results of the Playing Pitch Strategy and implications

Current capacity

Table 1: summary of data from stage 1 of the Playing Pitch Study showing capacity across different sports pitches

	Summary	Distribution of spare capacity	Scenario if remove sites with unsecured community use	Anticipated changes/ extra potential
<u>Adult Football</u>	Spare capacity of 18 match equivalent sessions per week	Spread geographically quite evenly across Herschel Crescent,	Reduces to 9 match equivalent sessions per week.	

		Oxford Spires, Cherwell School and Oxford Academy sites.		
<u>Junior Football 9v9</u>	Spare capacity total of 13 match equivalent sessions available (although reduces to 9 as Cowley Marsh currently being overplayed by 4 match sessions a week)	The sites with spare capacity are situated towards the south of the city at Donnington Recreation Ground, Herschel Crescent and Blackbird Leys Park.	Reduces to 5 match equivalent sessions.	St Edwards School has indicated that they would be willing to allow the community to use their site which would result in an additional 8 match equivalent sessions per week available.
<u>Junior Football 7v7</u>	There is spare capacity total of 25 match equivalent sessions available. (reduced by the 1 match equivalent session being overplayed at Cutteslowe Park).	The spare capacity is found at Blackbird Leys Park in the south of the city.	Reduces to 7.	St Nicholas, Windmill and St Mary & St John CE Primary Schools have indicated that they would be willing to allow the community to use their site which would result in an additional 8 match equivalent sessions per week available.
<u>Mini football 5v5</u>	There is spare capacity total of 8 match equivalent sessions available.	There are 2 Mini football 5v5 sites with community use available – Bayards Hill Primary School and Five Mile Drive.	Reduces to 0.	
Cricket: <u>Grass wickets</u>	There is spare capacity of 60 match equivalent sessions per season (this includes the new Oxford Sports Park site).	Oxford Cricket Club play at Jesus College Sports Ground, University College Sports Ground and Keble College Sports Ground and Oxford Cricket Club play at OUP Jordan Hill and Marston Road Sports Ground.	Reduces to 20.	
<u>Non-turf wickets</u>	There are 18 match equivalent sessions per season spare capacity at Cutteslowe Park and 120 at Oxford	Also spare capacity across Botley Park, Grandpont Recreation Ground and Quarry Recreation Ground,		

	Sports Park (which are soon to be bookable).	but these are free, publicly accessible wickets that are non-bookable.		
<u>Adult Rugby</u>	There is a total spare capacity of 26 match equivalent sessions. The figure accounts for the 13 match equivalent sessions per week being overplayed at Oxford Rugby Club and The Oxford Academy.	Includes Oxford Spires, St Edward's and Cherwell School.	Reduces to 0.	Oxford Harlequins RFC has indicated their desire to look at removing the grass cricket wicket at Horspath Sports Ground and replacing with a full-sized rugby pitch; this would result in an additional 2 match equivalent sessions per week available.
<u>Junior rugby</u>	There is spare capacity of 2 match equivalent sessions per week	Cheney School	No secure community use at Cheney School currently.	Cheney School are interested in starting community use.
<u>Mini rugby</u>	There is no spare capacity and 4 overplayed match equivalent sessions per week at Oxford Rugby Club.			
<u>Artificial grass pitches</u>	There is spare capacity across the City of 492 peak hours a week (including soon to be bookable at Oxford Sports Park).	The spare capacity is spread geographically across the city at Banbury Road North, Barton Park, Blackbird Leys, The Oxford Academy, Brookes Sport in Headington and East Oxford (smaller sized pitch).	Reduces to 390.	The calculation includes an additional 298 hours of small sided 3G football peak hours when Oxford Sports Park opens in the next two months.

Expected changes in demand

10. Population growth has been factored into the Playing Pitch Study period. Table 2 below shows how population change is expected to affect the demand for provision.

Table 2: How population change will affect the demand for provision - Based on 20 year projection 2019-2039

Sport	Age group	Current population within age group	Team Generation Rate	Future population within age group	Additional teams that may be generated from the increased population
Football	Senior Mens (16-45)	44,354	4032	48,651	1.1
Football	Senior Women (16-45)	41,699	10425	42,179	0.0
Football	Youth Boys (10-15)	4,569	90	5,860	14.4
Football	Youth Girls (10-15)	4,193	221	5,461	5.7
Rugby Union	Senior Mens (19-45)	41,839	2789	45,470	1.3
Rugby Union	Senior Women (19-45)	39,111	13037	39,037	0.0
Rugby Union	Junior Boys (13-18)	4,722	315	6,016	4.1
Rugby Union	Junior Girls (13-18)	5,329	1776	7,038	1.0
Cricket	Senior Mens (18-55)	50,965	10193	55,560	0.5
Cricket	Senior Womens (18-55)	48,190	12048	49,275	0.1
Cricket	Junior Boys (7-17)	8,569	8569	10,657	0.2
Cricket	Junior Girls (7-17)	3,473	3473	4,561	0.3
Hockey	Senior Mens (16-45)	44,354	3696	48,651	1.2
Hockey	Senior Womens (16-45)	41,699	3208	42,179	0.1
Hockey	Junior Boys (11-15)	3,736	0	4,867	0.0

Conclusions from the Playing Pitch Study and implications for the Local Plan approach

11. Although the Playing Pitch Study has not yet been written up into a formal report, the data collection and analysis stages have been completed. This has provided the information needed to draw conclusions in relation to the Local Plan, and Sport England is satisfied that the stages reached are all that is needed to inform the Local Plan.
12. The Local Plan approach was to generally assume that pitches need to be protected and where they are to be lost that this should be mitigated through replacement or enhancement of capacity elsewhere including at key hub facilities. This approach is supported by the results of the Playing Pitch Strategy, which shows that there is some capacity for nearly all sports, but that may be needed to meet the demands of a growing population. The Playing Pitch Study has shown that community provision continues to be important to meet demand, and in order to ensure demand will continue to be met there should be a focus on securing public access to unsecured sites or those with no public access. Much newly generated demand is expected to be met by the opening of the new Oxford Sports Park in Horspath Road (in 2019), which will provide floodlit 3G football pitches, grass football pitches, cricket and softball pitches, practice areas, a pavilion and changing rooms for the public, as well as being home to Oxford United's outdoor training facility. In order to continue to provide sufficient opportunities for outdoor sport in Oxford, whilst making best use of land, it is important that pitches are protected, and where the loss of an individual site can be justified, this will partly be by contributions to improve facilities and develop hubs.

Sport England at Regulation 19 and record of subsequent discussion and agreement

General approach and Policy G5

13. Sport England expressed concern in their Regulation 19 consultation that Policy G5 did not fully follow the NPPF approach. The City Council explained that the policy follows the intentions of the NPPF but is slightly adapted to reflect the needs of Oxford as a compact urban area. The NPPF approach requires replacement in terms of quantity, i.e. size of what is lost. Policy G5 requires replacement in terms of quantity of capacity, but not necessarily size of pitch. This is because Oxford is a compact city with a shortage of land and a high housing need. It is important that best and most efficient use of land is made.
14. The Parties agree that modern pitches can have significantly greater capacity than existing pitches. Sport England agreed that sport 'hubs' such as that being developed at the Oxford Sports Park are a more modern form of provision that are often the most attractive facilities for clubs and casual users and which significantly increase capacity. There is also likely to be significant development of 'hubs' outside but close to the city in the Green Belt developments being proposed by Cherwell District Council and South Oxfordshire District Council. The Playing Pitch Study shows that there is some capacity so not all sites will need quantitative replacement. Therefore, Sport England agreed that the approach of Policy G5 was a reasonable approach to in Oxford.
15. The City Council explained to Sport England that its general approach was to protect green spaces, but sites put forward for development were considered individually to see whether they were worthy of protection or to assess whether there could be any benefits to development on those sites. There is not a significant surplus of pitches across the City and spare capacity will be needed for increased demand generated by population growth. Therefore, the argument for allowing allocation of playing field sites is where it is clear that sports pitch capacity can be replaced and the requirements of Policy G5 could therefore be met, assuming no conflict with other Policies such as DH3: Designated heritage assets.
16. Sport England raised other concerns about the approach of G5 (and related paragraphs 5.14 and 5.15) and the site allocations; in particular they emphasised it is important to protect the sport and recreation value of open spaces, so ensuring pitch capacity is sufficient to meet needs is not enough if opportunities for general recreation are lost. The City Council explained that its approach was to assess green spaces individually for their Green Infrastructure value. If sites were well used or valued for outdoor recreation and had other functions such as flood storage or biodiversity they are protected as part of the Green and Blue Infrastructure Network (Policy G1). Therefore, the approach taken in G5 and to assessing whether green sites should be allocated does not risk the loss of valuable recreational spaces. Therefore, Policy G5 allows an appropriate amount of flexibility should development come forward on playing field sites where alternative provision can be made.

17. The City Council also explained that consideration was given to the realistic potential of playing field sites being re-utilised fully for other open spaces uses or as pitches, or whether an allocation would, in effect, enable improved facilities and capacity of pitches as well as public access to open space.

Site allocation policies

18. Sport England is happy with the general approach taken to playing fields in the Local Plan. The following table documents Sport England’s comments in relation to site allocations at Regulation 19 stage and their current position in relation to these sites.

Table 3: summary of Sport England and City Council’s position at Reg 19 and following February 14th meeting

Site	Site name	Status in the draft Playing Pitches Strategy	City Council’s reasoning for allocating site at Reg 19 and Sport England response.	Current position
SP5	Summer Fields School Athletics Track	This is a seasonal, painted athletics track used only by the school, so it is not included in the Strategy.	<p>The track will be re-provided elsewhere within the School’s extensive grounds. No impact on pitch provision.</p> <p><i>Sport England was concerned about the allocation given no up to date playing pitch strategy.</i></p>	<p>The City Council explained that the track is a painted seasonally onto grass for informal use by the school and that there was room within the school’s grounds for replacement whilst still maintaining all other sporting and recreational uses of the school’s playing fields.</p> <p><i>Sport England is satisfied that the existing use of the track, the scope within the school’s grounds and the requirements of the policy were sufficient to mean that the site could be allocated.</i></p>
SP12	Sandy Lane Recreation Ground	This site contains 2 adult and 1 junior pitch	<p>The City Council consider there is space on the site for pitch provision to remain, which is required by draft policy SP12.</p> <p><i>Sport England was concerned that the reduced space for the pitches would mean that they could not be rotated and that they may therefore deteriorate in quality.</i></p>	<p>The City Council explained that they own and manage the site, which reduces the risk of the pitches not being managed properly significantly. It was also explained that the Playing Pitch Study suggested sufficient capacity across the City but particularly in this area, where there is a lot of alternative provision e.g at Oxford Academy. Also, it was explained that the site was not assessed as being part of the Green and Blue Infrastructure Network as non-sporting use of the site is very limited. Therefore, whilst the re-provision might not be an exact quantitative re-provision, the qualitative improvement would be</p>

				<p>satisfactory.</p> <p><i>Sport England is satisfied with explanation and evidence now available and have no outstanding objection to the allocation policy.</i></p>
SP14	Edge of playing fields, Oxford Academy	The school has 2 adult football pitches, 1 senior rugby pitch, 1 senior cricket pitch. Secured community use.	The part of the playing field allocated is a small area of land at a lower level to the other pitches, not well used. Its development will not affect pitch provision at the school.	<p>The City Council explained that this piece of land is a small strip with a significant drop in level from the rest of the school's pitches, which is not well used formally or informally and which will not affect provision of pitches (or any outdoor recreation).</p> <p><i>Having reviewed the site specific context Sport England has no outstanding objection to the allocation.</i></p>
SP15	Kassam Stadium	Oxford United Football Club's ground	<i>Sport England was concerned about some of the details of the policy, in particular, they thought that parking should not be lost.</i>	<p>Sport England's concern with the policy in relation to parking was that the stadium would not be viable and that revenues to the club would be affected. The ownership position of the club was explained (i.e. the club does not own its ground or gain revenue from parking), and also Oxford's general approach to parking and the other alternatives available in the city.</p> <p><i>Having reviewed the site specific context, Sport England does not have an outstanding objection to the policy.</i></p>
SP23	Warneford Hospital	The site once contained a cricket pitch linked to the hospital, with private access only, so it is not included in the Strategy.	<p>The site is not included in the Playing Pitch Strategy and the potential for community use of the site is limited because of its use. The loss of the sports facility is considered justified because of the potential new uses that can be located here. The policy requires that the playing fields are re-provided or contributions made to improve nearby facilities to enhance their capacity.</p> <p><i>Sport England said that whilst the requirement</i></p>	<p>The PPS confirms that quantitative re-provision is not required, so qualitative improvements will be acceptable.</p> <p><i>Now that the evidence is available, Sport England does not have an outstanding objection to the policy.</i></p>

			<i>for replacement provision is welcomed it is difficult to say whether it relates to the whole playing field or not until the PPS is completed.</i>	
SP33	Bertie Place Recreation Ground and land behind Wytham Street	1 Multi-Use Games Area. MUGAs are not included in the draft Playing Pitch Strategy.	No impact on provision assessed in the Playing Pitch Strategy. Much of the site is not developable and the MUGA would be moved to that area. <i>Sport England was concerned about the loss of an outdoor sports facility without the Playing Pitch Study being in place to support this.</i>	It was explained that the site consists of two parts and development would only be permitted on the smaller part. The smaller part currently comprises all the public outdoor sport and recreation and the larger part is overgrown scrub. If development were to take place the playground/outdoor recreation facility would be moved from the smaller to the larger site. <i>Given the site specific context along with the information from the playing pitch strategy, Sport England is satisfied with the allocation and has no outstanding objections to the policy.</i>
SP39	Former Iffley Mead Playing Field	This is a disused school playing field, which is not included in the Strategy.	No impact on provision assessed in Playing Pitch Strategy. Contributions to nearby provision would be required to compensate for the loss of the playing field. <i>Sport England was concerned that the allocation could not be justified without a PPS in place.</i>	The City Council explained that this site is no longer used as a school playing field and that it is fenced off with no public access. The City Council considered that there would be more benefits to outdoor sports provision from allocating the site rather than not allocating it. The policy requires re-provision or contributions to compensate for loss of the playing field. Also 10% public open space will be required on the site. The site adjoins Donnington Recreation Ground which provides an excellent opportunity to improve facilities and enhance capacity, which would help overcome the problem of overplayed matches at nearby Cowley Marsh. <i>In the context of the data collected as part of the Playing Pitch Strategy, the site specific context and the opportunities to improve facilities Sport England is satisfied with this site allocation and has no outstanding objections to the policy.</i>
SP41	Jesus College Sports Ground	Comprises: 1 accessible senior football pitch – adhoc use 1 accessible	In the Green Spaces Background Paper published at the Regulation 19 stage of the Draft Local Plan 2036	The City Council explained that the landowner would be able and have expressed their intention to share facilities with another college so would still be meeting their own

		<p>senior rugby union pitch – adhoc use</p> <p>1 accessible senior cricket pitch – adhoc use</p>	<p>the City Council set out that there would be a loss of pitches potentially resulting from the allocation of the site, but that this would be offset by the potential benefit in terms of improvements to public accessibility and capacity nearby. The previous Playing Pitch Study suggested that the site was surplus to requirements in all but 1 scenario. Sport England was concerned that the loss of pitches could not be justified without the updated Playing Pitch Strategy.</p>	<p>requirements.</p> <p><i>In the context of the data collected as part of the Playing Pitch Strategy and the site specific circumstances, Sport England is satisfied with this site allocation and has no outstanding objections to the policy.</i></p>
SP44	<p>Lincoln College Sports Ground</p> <p>Info from old ppa (no update into latest version yet)</p>	<p>Comprises:</p> <p>1 accessible senior football pitch – adhoc use</p> <p>1 accessible senior rugby union pitch – adhoc use</p> <p>1 accessible senior cricket pitch – adhoc use</p>	<p>In the Green Spaces Background paper published at the Reg 19 stage the City Council set out that there would be a loss of pitches potentially resulting from the allocation of the site, but that this would be offset by the potential benefit in terms of improvements to public accessibility and capacity nearby. The previous Playing Pitch Study suggested that the site was surplus to requirements in all but 1 scenario. Sport England was concerned that the loss of pitches could not be justified without the Playing Pitch Strategy.</p>	<p>The City Council explained that the landowner are able and have expressed their intention to share facilities with another college so would still be meeting their own requirements.</p> <p><i>In the context of the data collected as part of the Playing Pitch Strategy and the site specific circumstances, Sport England is satisfied with this site allocation and have no outstanding objections to the policy.</i></p>
SP48	Neilsen	<p>This site contains a disused playing pitch that was in</p>	<p>Because the sports facility was no longer in use and because of the</p>	<p>The City Council confirmed that this site was not included in the Playing Pitch Strategy as it is decommissioned sports</p>

		the employer's private use. As such it is not included in the Playing Pitch Strategy	need for and benefits of new housing, the loss of the former facility was considered justified. Requires facilities to be re-provided or a contribution made to facilities elsewhere (EC65a and EC65b). This ensures that any loss of facilities will be adequately mitigated.	pitches, but also that, in acknowledgement of the fact that all disused pitches have latent potential to be brought back into use, the policy does require re-provision or a contribution. <i>In the context of the data collected as part of the Playing Pitch Strategy and the site specific circumstances, Sport England is satisfied with this site allocation and have no outstanding objections to the policy.</i>
SP52	Oxford Stadium	This site includes a former greyhound racing stadium that was also used for speedway.	The policy allows for revival of the stadium with other community or leisure uses and enabling residential uses. <i>Sport England was concerned that any enabling development should not prejudice use of the stadium.</i>	The City Council agreed that reference could be made in the supporting text of the policy, which is suggested in the schedule of minor modifications, to say that the established use as a stadium should not be affected by permitting of new residential developments in proximity. <i>Sport England is satisfied that this minor amendment would overcome their objection.</i>
SP53	OUP	Comprises: <ul style="list-style-type: none"> • 1 accessible senior football pitch – access restrictions apply • 1 accessible senior cricket pitch – access restrictions apply • 1 bowls green – no access, members only 	<i>Sport England objected to the allocation of this site because of the lack of a Playing Pitch Study that could justify the loss.</i>	It was explained that it is expected that sports provision could remain on site. Sport England was concerned about the proximity of the cricket pitch to new development. It was explained that the site is large and that the cricket pitch is close to existing current development. It was explained that the size of the site means that the cricket pitch could be buffered from new and existing housing by the other pitches. <i>Having considered the site specific context in more detail I, Sport England is content with the allocation and has no outstanding objections to this policy.</i>
SP65	Bayards Hill	1 youth and 1 mini football pitch with secured public access.	The pitches would not be affected by the small housing development. <i>Sport England was concerned about whether the remaining area of playing field would be of sufficient size for the school.</i>	The City Council explained that the site allocation comprises only part of the school's playing fields, so that sufficient space will remain for school playing field use. <i>Sport England is satisfied with this approach and has no outstanding objections to this policy.</i>

SP66	William Morris Sports Ground	This is a former private cricket pitch which has not been used for over 10 years and that was not fully accessible to the public or of the right size, so it is not included in the playing pitch study.	No impact on pitch provision. <i>Sport England pointed out in their rep that the site could be utilized for alternative sports provision.</i>	This site is subject to a current planning application. The developer has put forward a funding proposal to mitigate loss of the pitch. <i>Sport England has agreed that, having seen and commented upon the proposal in the planning application alongside the agreement to the approach in G5 they are satisfied that alternative provision can be achieved, and that this site can therefore be allocated. Sport England have no outstanding objections to this policy.</i>
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Indoor sports

19. At Regulation 19 Sport England said that reference to indoor sports facilities should be removed from the supporting text to Policy V7: Infrastructure and cultural and community facilities and covered in G5 which should apply to indoor and outdoor sports facilities and buildings to be consistent with NPPF para 97.
20. The City Council’s view is that sports facilities should be considered under a separate policy dealing with community facilities. Pavilions will be linked to sports pitches and re-provision of these will be required in accordance with the NPPF. However, there are many types of indoor sports facilities. The increasing pressure to make efficient use of resources means that greater flexibility of uses is to be encouraged. Increasingly in the City facilities are combined. For example, the new Rose Hill community centre has a gym and flexible rooms that can be hired for many uses including sports classes. This important link between indoor sports and community facilities means that they should be dealt with under one policy, rather than moving indoor sports to policy G5.

Conclusions

21. The Parties agree that:
 - They have a positive working relationship and a demonstrable track record of successful collaborative joint working with effective outcomes;
 - Through regular meetings the two parties will continue to work cooperatively on matters of mutual interest including determining whether compensatory improvements proposed with planning applications are adequate;
 - The Playing Pitch Study methodology has followed guidance and that it is now sufficiently progressed to inform Sport England’s judgement on the Local Plan;
 - The green spaces policies, including protection of sites, are appropriate;
 - The allocations for development of sports pitches, given the site specific considerations, are appropriate;
 - Sport England is satisfied that their objections to the Plan are resolved and that there are no outstanding objections to the Oxford Local Plan 2036.

Signed:



Name:

Bob Sharples

Position:

Principal Planning Manager - South Team

Date:

15th March 2019

Sport England

Signed:



Name:

Adrian Arnold

Position:

Interim Head of Planning

Date:

21st March 2019

Oxford City Council