

Statement of Common Ground between Oxford City Council and Sport England

Submission Draft (Regulation 19) Oxford Local Plan 2045

July 2026

1.0 Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared between Oxford City Council and Sport England for the Oxford Local Plan 2045. This SoCG reflects and confirms the current position on matters agreed by both parties with regard to issues of soundness and maintaining effective cooperation.

1.2 Oxford City Council is producing a new Local Plan covering the period to 2045. The SoCG reflects the latest position agreed by the parties and is provided without prejudice to other matters that the parties may wish to raise. The area covered by this Statement is Oxford, which is the area covered by the Local Plan. Where matters arise that are cross-boundary, the Council is also working with its neighbouring local authorities and other SoCGs have been prepared on cross boundary matters.

2.0 Background and Maintaining Effective Cooperation.

2.1 Sport England are the public body that aims to help provide active environments that maximise opportunities for sport and physical activity for all, enabling the already active to be more so and the inactive to become active. They are a key stakeholder for the Council to work with in the development of the new Oxford Local Plan 2045.

2.2 Oxford City Council and Sport England have been engaging together on the development of a new Playing Pitch Strategy (PPS) for the city. The PPS will identify current and future needs to 2045 for pitch provision in Oxford, strategic actions for meeting these needs, and will act as a key piece of evidence supporting the implementation of the new Local Plan 2045. Sport England have also provided feedback at key stages in the development of the Local Plan, including through the Preferred Options Regulation 18 consultation (2025) and the Proposed-Submission Draft Local Plan Regulation 19 consultation (2026). The relevant consultation summary reports detail summaries of this feedback.

2.3 The Proposed-Submission Draft Local Plan Regulation 19 consultation (hereafter "*the Reg. 19 consultation*") saw Oxford City Council publish its full Local Plan and supporting evidence base which it proposed to submit for examination to Central Government in June 2026. As per the relevant legislation/regulations, this version of the Local Plan was one that the City Council considered to be 'sound' for adoption, meeting the specific requirements for soundness as are outlined in the National Planning Policy Framework. In response to the Reg. 19 consultation, feedback from Sport England indicated there were a number of areas in relation to the draft policies and supporting evidence underpinning them which they considered did not meet the tests of soundness for adoption without additional modification.

2.4 Following the end of the consultation, on the 13th March 2026, Oxford City Council and Sport England have been engaging together on the issues which Sport England have identified with the Local Plan and supporting evidence, including via meetings (which took place on 16th April 2026, 29th June

2026, and 6th July 2026) as well as via emails. The aim of this collaboration has been to identify means of resolving issues flagged by Sport England through their Reg. 19 consultation response in order to reach a point whereby Sport England can support the Local Plan submission without objection.

3.0 Strategic matters

3.1 Sport England raised a number of soundness concerns relating to various policies, site allocations and supporting evidence as part of their response to the Reg. 19 consultation. The original representations can be referred to for the full detail of the issues raised, however, a summary of these comments is also included in Appendix A of this statement.

3.2 The key issues raised by Sports England can be further summarised into a few topics, which are as follows:

- That the Council's new Playing Pitch Strategy (PPS) is still in progress and as such the Local Plan has not been positively prepared as it has not been informed by this work.
- Concerns about the impacts of a number of strategic policies such as G1, G2, G6 and R8 and how these will impact future applications relating to sports provision in the city.
- Objections on a number of site allocations policies which would have the potential for impacting upon existing sports provision.

3.3 Ongoing dialogue between the two parties since the Regulation 19 consultation has resulted in a number of proposed main or minor modifications to the Local Plan's policies which Oxford City Council and Sport England have come to agree would be beneficial changes that could be made to the Local Plan in order to resolve some of their identified concerns relating to the points set out above. A full list of these proposed modifications agreed between the two parties is included in the Table at Appendix A of this statement – as well as being listed in the Schedule of Main Modifications or Schedule of Minor Modifications submitted separately with the full Local Plan submission. Appendix A summarises Sport England's representation, shows the City Council's response, including any proposed modifications, and then shows the final position of Sport England.

3.4 At time of the submission of the Local Plan, there remain some areas where common ground has not been reached and these are also identified in Appendix A. A key concern of Sport England is the status of the Council's new Playing Pitch Strategy and how this will inform the new Local Plan, particularly in that it is yet to be completed. Additionally, Sport England have unresolved concerns with the wording of parts of Policy R8 and its implications for development that relates to sports uses. There is also an unresolved concern in relation to allocation SPS15 (Sandy Lane) and the potential impacts of any loss of existing sporting provision on the site, though this concern may ultimately be able to be overcome as the Playing Pitch Strategy continues to emerge.

4.0 Concluding remarks/areas of agreement

4.1 Oxford City Council and Sports England have been working closely together to seek to resolve issues identified through the Reg. 19 Local Plan consultation, as well as on the ongoing development of the City Council's new Playing Pitch Strategy. This Statement of Common Ground and the accompanying Appendix A set out the modifications to be put forward to the Inspector that the two parties have

agreed would overcome the majority of issues Sports England had initially identified. The statement also sets out in para 3.4, and in greater detail in Appendix A, where it has not been possible to find a resolution to an issue raised, with both parties' positions outlined.

4.2 Whilst this additional work and engagement between the two parties has allowed us to find common ground on nearly all issues, notwithstanding those set out, both parties will continue to work together on issues that arise during the examination process, as well as through the ongoing development of the Playing Pitch Strategy which will support the implementation of the Local Plan. The parties will also continue to work together in preparing supporting guidance (such as Technical Advice Notes) in order to help implement the new Local Plan in due course.

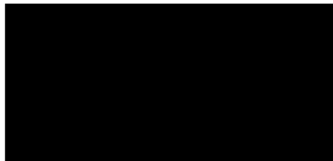
Signed on behalf of Sport England



Title: Bob Sharples, Principal Planning Manager, Sport England

Date: 9th July 2026

Signed on behalf of Oxford City Council



Title: David Butler, Director of Planning & Regulation, Oxford City Council

Date: 10 July 2026

Appendix A – Sport England Regulation 19 feedback and City Council responses

The table in this appendix sets out the City Council’s responses and proposed amends to the Local Plan agreed with Sport England to address their Reg 19 comments.

Policy/ Para	Sport England summarised comments	Sport England suggested changes	Council response	Final position
C3	Policy C3 cannot be applied effectively to built sports facilities. A separate policy for protecting (and encouraging the improvement and new types of) these type facilities is needed. The emerging NPPF reaffirms that there is a separation between the policies for sport and recreational facilities and other types of community facilities. The policy also states that the location of new facilities must be ‘easily accessible by walking, cycling and public transport’ and ‘not result in an unacceptable environmental impact or loss of amenity.’ Often sports and community facilities are built on or adjacent to playing fields which will not be in town centre locations and may not be easily accessible by public transport. Also, strongly object to the paragraph in draft policy C3 [criteria d and e] that allows for the loss of sports facilities if there are other facilities in the area that can be enhanced or the proposal is for an alternative community facility for which there is greater need or demand. This does not comply with paragraph 104 of the NPPF as sports facilities could be lost that are	A separate policy for indoor and built sports facilities should be developed in order to protect these from loss and support improvements to them. The new draft policy should be consistent with national planning policy. See paragraph 104 of the NPPF and our comments on G1.	Whilst Policy G1 protects outdoor spaces in many instances within the wider GI network (see also our responses under G1), Policy C3 addresses Use Class F.2, which covers a few types of indoor sports use that we can have some control over. It is acknowledged that it does not apply to the majority of indoor sports uses because most indoor sports facilities are within Use Class E. This is a very wide-ranging use class, but planning cannot distinguish between the various uses within it or control changes between uses within that Use Class. This limits what more the Local Plan, or an additional policy, can do unfortunately In relation to comments on criterion c, the purpose of this is to help ensure that replacement provision is not located in areas with less accessibility than that being lost. The Local Plan seeks to promote active and sustainable transport in the first instance. Whilst we accept that facilities can often be located away from town centre locations, we feel it is important to seek to secure accessible replacement provision that does not rely on private vehicle use in the first	The Council’s response is accepted, and Sport England’s initial objection is now resolved.

	needed by the community for sport to other uses such as education and health. National planning policy does not permit this and it could allow more school and health buildings to be built on community sports sites.		instance and we do not propose to amend this. In relation to criteria d and e, this covers a broader range of uses than just sports provision. When it comes to impacts on sports facilities, however, the NPPF tests would still apply as you point out, and it is not necessary to repeat these verbatim in the policy. It is also unlikely applicants are going to be able to demonstrate these are surplus to requirements in most incidences, thus we do not currently think there is justification for further modifying them.	
C4	The policy must be clear that any playing fields on education sites (schools, use class F1) are protected from development otherwise the policy is not compliant with national policy.	School playing fields should be protected from development and assessed against the relevant tests set out in national policy and Policy G1.	The Local Plan designates a network of different types of open space for protection through Policy G1 as either core or supporting green infrastructure - this includes playing fields where they are identified as green infrastructure which provides important local benefits. The policy sets out requirements that would need to be met before any loss/harm would be accepted. Additionally, where open spaces are not protected through Policy G1, the protections for open space as included in national policy (e.g. NPPF Para 104 - which also includes playing fields) would still apply and the Local Plan does not change these. It is not considered necessary for the Local Plan to go any further in its approach or that the approach is in conflict with the NPPF.	The Council's response is accepted, and Sport England's initial objection is now resolved.

G1	Whilst acknowledging that amendments have been made, it has still not been positively prepared. The Council has not completed its Playing Pitch Strategy and therefore does not have the evidence to inform Policy G1 and ensure that the requirements of NPPF para 103 are met, including that ancillary facilities, such as changing rooms, artificial pitches and sports courts and MUGAs on playing field sites are also protected from development. The Council is continuing to include playing field sites within the site allocations that Sports England continue to object to, rather than protecting them through policy as both the adopted and emerging NPPF require. Playing fields should be protected from development, change of use etc. Development should only be accepted where the tests in paragraph 104 of the NPPF are met. For example, we object to the words ‘whether alternative sports might better suit the local community’. The policy provides no explanation of how this might be assessed.	The policy and the plan do not plan any new sport and recreation facilities or identify new opportunities to meet needs. Concerned that the plan is being brought forward without appropriate evidence being presented for review so we conclude that the Plan has not been positively prepared with regard to sports facilities. The Council should also update its strategy for built sports provision and there is no policy adequately protecting indoor sports facilities. The Council will need to complete the PPS to ensure that all playing fields and their ancillary facilities are correctly identified and these will then need to be recorded. The plan should include supportive policies for new sport facility developments e.g. - <i>Proposals for sport and recreation facilities will be encouraged and supported in line with other policies in the Plan and Sport England guidance.</i> - <i>The Council will seek to protect, maintain and where possible enhance existing open space, sport and recreation, play facilities and land including</i>	<i>Comments in relation to finalising the PPS are addressed separately further down the table.</i> In relation to protection of playing fields – the Council has sought to protect a significant number of playing fields through its protected green infrastructure network. These are typically protected as supporting GI (G1B spaces) as a minimum – which assigns the protections of the NPPF for open space as you set out, but also requires reprovion of any lost green infrastructure. It should be noted that, whilst the GI network is primarily made up of ‘green’ spaces, it can include other open spaces linked with recreation, including artificial surfaces. We would be happy to propose a modification to the glossary under the definition for green infrastructure to make this clearer in terms. Modification to be proposed to the glossary as follows: <i>Green Infrastructure: A network of spaces and features including parks, playing fields, woodland, allotments, private gardens, green roofs and walls, street trees. The term also incorporates ‘blue infrastructure’ such as streams, ponds, canals, and the rivers <u>and can include other types of open space that contribute to health and leisure, such as artificial pitches and</u></i>	The proposed modifications would help to overcome Sport England’s objections.
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		<i>playing fields to ensure their continued contribution to the health and well-being of the community.'</i> Proposals affecting sports facilities should be considered against the tests set out in the NPPF para 104.	<u><i>play spaces for children/young people.</i></u> Additionally, we agree that some extra wording setting out our support for new sport and recreation facilities could be helpful and are happy to put forward a mod, though we would suggest a better place for it would be as part of Policy S1. We propose the following mod to add an additional criterion under policy S1 as follows: <i>To help achieve this it will aim to ensure development is located to: ...</i> <u><i>j) Support the health and wellbeing of local communities such as by delivering new sports and recreation facilities or enhancing existing provision.</i></u> The protection-related wording of your second proposed bullet is not considered necessary, as this is already carried out through Policy G1, C3 and the NPPF.	
Evidence - PPS	More evidence is required for sport to consider the needs of the existing and new residents for existing, expanded and new sports facilities in Oxford. Tennis and padel should be included. It is welcome that the Council is progressing a playing pitch strategy (although this should have been commissioned much earlier to properly inform the plan). However,	The Playing Pitch Strategy should be completed to inform the Local Plan and Infrastructure Delivery Plan. Tennis and padel also need to be covered within the Council's evidence base. The interim report should not be relied upon as its findings are premature.	As soon as the Local Plan 2040 was withdrawn and we began working on the new Local Plan 2045, we identified the need for an updated Playing Pitch Strategy and have worked hard to commence this work as quickly as possible. Earlier commissioning was not possible, and speeding up the work is equally impractical due to the seasonal nature of some survey work, as Sport England will be aware.	Sport England are supportive of the Council continuing to work towards completion of the new Playing Pitch Strategy, however, maintain an ongoing objection to relying on the work in a partially complete state.

	strongly object to the inclusion of the KKP interim report Oxford City Playing Pitch Strategy Local Plan Interim report within the evidence base. This includes premature conclusions, (some of which Sports England disputes), as the data has not been checked and signed off by the national governing bodies, nor has the demand from all of the sports been assessed – e.g. Stage B has not yet been completed. Sport England is concerned that the emerging Playing Pitch Strategy is being used to justify a loss of playing field rather than providing an independent assessment of the need for playing pitches within Oxford City in line with Sport England’s recommended methodology and the NPPF. The Playing Pitch Strategy is also required to inform the Council’s Infrastructure Delivery Plan.		The scope of the PPS work, including sports covered, was agreed with the steering group as part of the Stage A meeting, and Sport England were a part of this. As discussed in our catch up, it is not considered reasonable to have delayed preparation of the Local Plan entirely whilst waiting for the PPS to be finalised, we have however tried to ensure the preparation of the two documents are as aligned as possible and that emerging analysis is informing our approach as it emerges. The rationale for publishing the interim note was to share as much as we could to inform the Reg 19 consultation, whilst acknowledging that this picture can still change as the PPS continues to develop. In relation to concerns about the new PPS being used to justify losses in pitches, we strongly disagree. The city is indeed under immense pressure to explore all areas of land for potential housing, including pitches, as is well documented. However, whilst securing more housing is an important objective of the Local Plan, another is to protect a network of green spaces for health and wellbeing, and this includes pitches. We see an updated PPS as not only an important tool in helping to identify current/future needs for pitches and associated facilities,	
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			but also in helping to justify the balance we are trying to strike in maximising land for housing whilst also protecting spaces like pitches through policies such as G1. The City Council considers the PPS to be a key piece of evidence supporting approaches being taken in the Local Plan, including the protection of playing pitches alongside the broader green infrastructure network through policy G1. The PPS will also be a key reference point that will need to inform proposals for development where these are brought forward in locations that could impact upon pitch provision in future and it is referenced as such through the policy. Additionally, the expectation is that as the PPS continues to develop throughout 2026, it will also be able to inform future updates to the Council's Infrastructure Delivery Plan, which identifies key infrastructure requirements needed to support the Local Plan 2045 (and is a live document). This could include identifying requirements for new facilities or enhancements to existing facilities, depending on what emerges from the PPS.	
G2	The information that has been collected for the Council's new Playing Pitch Strategy (and as highlighted in its existing PPS) identify that there is a need to improve existing playing field and other sports facilities in Oxford City.	Please also see comments on Policy G1. The Council needs to complete its evidence base for sports facilities and update its policies accordingly, responding to the recommendations flowing from	Criterion b) of the policy sets out that one of the benefits applicants should seek to secure is <i>Health and wellbeing, including facilitating recreation and play for people of all age groups and abilities...</i>	The proposed modification (as well as the proposed future TAN and update to the IDP) would overcome

	For example, there are playing fields within Oxford City that have no toilet facilities on site which can discourage women and girls from taking part in sport. Whilst Policy G2 mentions many other types of open space, it is silent on seeking to improve playing fields and other sports facilities which does not accord with NPPF para 103.	that work. As a minimum the policy text should include text to explain that the Council will protect, maintain and where possible enhance existing open space, sport and recreation, play facilities and land including playing fields to ensure their continued contribution to the health and well-being of the community.	This would include improving formal and informal pitches as well as providing new or enhanced facilities that are intrinsic to the function of those spaces. We are happy to propose a mod to make this clearer as follows: <i>b) Health and wellbeing, including facilitating recreation and play for people of all age groups and abilities, particularly children and teenagers <u>(e.g. play equipment, pitches and associated facilities)</u>;</i> It is acknowledged that the policy is covering a broad range of considerations. Our intention would be to bring forward a Technical Advice Note (TAN) that supports this policy. The Green Infrastructure and Biodiversity TAN could expand on various criteria in the policy such as this one and lay out various examples of how applicants might fulfil it including some additional focus on ways to improve associated sports facilities. As highlighted elsewhere in this table, we also intend to update our IDP as and when the PPS is finalised. This is where we can identify specific improvements to facilities that are needed of the plan period, based on the PPS findings. We can also continue to keep this updated where needs change in future as the IDP is intended to act as a live document.	Sport England's objection.
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G6	Concerned about what this policy means for any playing fields or other sports facilities within these designated areas. It is not unusual for grass pitches to be located next to or within local wildlife sites (or similar designations). With reference to the playing pitch strategy and other documents that record playing fields and recreation facilities, the Council must carefully balance any new policies that could prevent Oxford's residents from enjoying the outdoors and keeping physically active. Often natural areas can benefit humans and nature so encouraging policies that support but must be given appropriate consideration in an urban environment.	Amendments are required to Policy G1 (please see other comments) or this policy to confirm that the City Council will support proposals for sport/rec, and that any proposals for new pavilions or improvements to existing sports facilities will be supported e.g. <i>Proposals for sport and recreation facilities will be encouraged and supported in line with other policies in the Plan and Sport England guidance'</i>	The comments here seem to be looking for a level of certainty in decision making which we are unable to be explicit about at plan-making stage. Particular issues in relation to biodiversity impacts or health and wellbeing, and which one weighs heavier than the other, will be different with every site and location. Policy G6 sets out a hierarchy of protection which aligns with the level of designation that different sites have in the city. Some of these protections exist regardless of the local plan (e.g. national designations), some are assigned through the Local Plan because sites have locally significant biodiversity value. Our proposed mod set out earlier to add to Policy S1 would introduce more explicit support for sport and recreation facilities, which we believe would respond to your concern here.	The modification proposed to Policy S1 would overcome Sport England's objection.
R8	Where new sports facilities are proposed this may mean additional traffic. But there is no explanation of 'unacceptable transport impact' is. Concerned that the policy applies to applications for sports lighting, yet the policy gives no acknowledgement of the benefits of outdoor sports lighting or street lighting to providing health	The plan does not acknowledge the benefits lighting can bring to active travel and outdoor sports facilities, or considers agent of change. This could be rectified with additional wording to acknowledge the benefits that these types of proposals can bring to the health and wellbeing of the community.	The requirements of the policy are of relevance both to protecting the amenity of the new development (the occupiers) as well as the amenity of existing development nearby (communities and neighbours). It does not favour one over the other and we have tried to make this clearer in response to your previous comments on the Reg	Sport England maintain an objection to the wording in the policy as it is still considered to be too inexact and would benefit from more specificity. Sport England's new guidance would be of benefit for applicants

	communities. The policy strongly favours ‘the amenity of communities, occupiers, neighbours and the natural environment’ (see bullet point a). Not clear how the policy will be applied. The same applies for new outdoor sports facilities. The policy offers no context for applicants as to when a noise assessment will be needed, so it may be required for very minor planning applications. Sport England’s planning guidance on ‘Artificial Grass Pitches Acoustics Planning Implications may be helpful, though it needs updating. The agent of change principle also works the other way, for example, housing development should not be located near existing ‘noisy’ uses such as existing MUGAs, artificial pitch facilities or playing fields with sports lighting. There does not appear to be a policy that takes into account the themes of paragraph 200 of the NPPF so it is recommended that this is also developed.		18 through the policy context bullets before the policy box. Therefore, the example flagged about a proposal for housing being located near noisy uses would engage these considerations, in the same way that a proposal for a ‘noisy’ use near an existing residential area would also. The supporting text also references the Agent of Change. The definition of what is an unacceptable transport impact will vary depending on the local context including what is proposed, what the current transport network is like etc. It is not possible to define what will be considered unacceptable at the plan-making stage. This is also true of requirements for noise assessment. In relation to lighting, the policy needs to set out the broad considerations that may need to be factored into decisions when it comes to impacts on amenity. Considerations about appropriate levels of lighting for the needs of occupiers and the impact on neighbours are an important element of the design process regardless of what use is proposed. Of course, the needs of the proposed use are an important factor in helping to determine what is an appropriate level of lighting and we accept that a sports facility	and decision makers to refer to when designing sport lighting.
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			could have quite different needs than other uses.	
NEOAOF	Sport England objects to this policy text and advises amendments should be made to acknowledge the sport and recreation facilities within this area and their importance to the local community for sport. Sport England is concerned that the policy does not acknowledge that sports facilities are within the Area of Focus and does not include any requirements to protect them or improve them. Planning permission should not be granted for development that will affect existing sport and recreation facilities (including playing fields). The NPPF (paragraph 103 and 104) expects local authorities to set policies within their development plan that will protect and improve their open spaces, sport and recreation facilities regardless of ownership.	The policy should be updated to seek improvements to Five Mile Drive Recreation Ground, the Oxford University Press sports ground and other playing fields and sports facilities within this area of focus. For example, Five Mile Drive is an important site for youth football with improvements need to the quality of the pitches. In its current form Sport England considers the policy is not consistent with national policy and it is not justified or effective with regard to sport and recreation.	In practice, each AoF covers a broad range of uses and we have not sought to acknowledge all of these exhaustively. Other overarching policies protect pitches (e.g. policy G1) and community facilities (e.g. policy C3). Relevant allocations within the AoF also set out their own specific requirements where proposals could impact a sports site. The AoF policy does not need to repeat these requirements as the Local Plan needs to be read as a whole. We don't agree that particular improvements to sites and facilities need to be identified through the AoF policies to be consistent with national policy. The need for enhancements to existing facilities is likely to change and evolve over the lifetime of the Local Plan. It will also need to be informed by the PPS (and future iterations). We would suggest the better place for identifying these needs is through the Infrastructure Delivery Plan – which is intended to be kept as a live document. As the PPS continues to emerge, we will ensure the IDP is updated to reflect any key improvements to facilities that are identified as part of future updates.	The Council's response is accepted, and Sport England's initial objection is now resolved.
SPN4 OUP Sports Ground	This site is actively used by local community sports teams, including Oxford Cricket Club. It has a cricket	This site allocation should be removed from the Plan.	This site has been allocated since the Sites and Housing Plan, and is a current allocation in the OLP36. For	The proposed modification would help to overcome

	pitch and 2 adult pitches. These community clubs will be displaced if this site is allocated for development. The Council has not completed its Playing Pitch Strategy and it cannot be concluded that this site is surplus to requirements, please see also Sport England's comments on the evidence base. The proposal to develop a playing field is not consistent with national policy (paragraph 104) or the policies in the draft NPPF and is not justified.		the new Local Plan, as part of our capacity assessment informing the minimum housing number for the allocation, we have assumed the retention of cricket onsite. The allocation then sets out clearly that: <i>a) The capacity of the sports provision must be retained unless it can be demonstrated that it is surplus (which is not the case at the current time) or the loss of the sports provision can be otherwise compensated for (Policy G1).</i> We feel that the allocation as worded sets out an appropriate framework of requirements to ensure any potential impact arising from development on the sports uses of the site are fully considered and mitigated. However, following our further discussions in relation to Sport England's concerns, we would be happy to propose the following modification: <i>a) The capacity of the sports provision must be retained unless it can be demonstrated that it is surplus (which is not the case at the current time) or the loss of the sports provision can be otherwise compensated for (Policy G1).</i> <u><i>Reference will need to be made to the Playing Pitch Strategy.</i></u>	Sport England's objection.
CBLAOF	This site area includes a number of sport and recreation facilities that are important to the local community. For example, the	The policy should be updated to seek improvements to the playing fields and sports facilities within this area. The	Please see our response above, against Sport England's comments on NEOAOF, which is of relevance to this representation also. In relation	The Council's response is accepted, and Sport England's initial

	playing fields at Sandy Lane are still used by the local community (in spite of its allocation in the past Local Plan). The NPPF (paragraph 103 and 104) expects local authorities to set policies within their development plan that will protect and improve their open spaces, sport and recreation facilities regardless of ownership. Sport England considers the policy is not consistent with national policy and it is not justified or effective with regard to sport and recreation.	policy mentions seeking new public open space but instead the Council should consider identifying within the plan those existing open spaces. Infrastructure contributions should be collected to improve these existing community spaces.	to Sandy Lane specifically, the allocation sets out expectations for how impacts on the existing pitches should be approached and these do not need to be repeated in the broader AoF.	objection is now resolved.
SPS4 Cowley Marsh Depot	Sport England requests amendments are made to this policy to protect use of adjacent community playing field.	The following wording is suggested; ‘The adjacent site is used for sport including cricket. The proposed development (including proposals for connection to the adjacent recreation ground) support the continued use of the site for sport. Appropriate mitigation (such as ball stop fencing) should be provided to ensure use of the site for cricket can continue.’	The adjacent green space to the north is protected as core green infrastructure under Policy G1 already, which affords a high-level of protection to the green space. Policy discusses the adjacent cowley marsh rec ground but we are happy to propose further mods to criterion b as follows: <i>b) Public open space will be required onsite (Policy G2). The location of the public open space should take into account opportunities to provide connections and enhancements to the adjoining Cowley Marsh Recreation Ground <u>including supporting the existing sports uses accommodated there.</u></i> And an additional criterion under ‘additional details’ as follows:	The proposed modifications would help to overcome Sport England’s objections.

			<u>XX) The site is adjacent to a playing field used for sports including cricket and as such design proposals should give consideration to the need for appropriate ball stop fencing at the boundary of the site to mitigate risks of ball strikes so that those uses can continue to be supported there.</u>	
SPS6 Former Iffley Mead Playing Field	Planning permission for this site has been submitted (25/00813/OUT). This site could provide an extension to the adjacent community playing field to meet the increase in demand from that site.	Pending the outcome of the Playing Pitch Strategy, it is recommended that the opportunity for this site to provide community playing field is reconsidered. For example an area of the site could provide for an extension to the adjacent community playing fields.	This site is currently allocated in the OLP36. On submission of that plan, the policy required compensation for loss of the pitch. At hearings, Oxfordshire County Council as landowner argued that this was not justified as the site had not been needed as a playing field for some time. The City Council and Sport England attempted to justify the requirement, but the Inspector agreed with the county that the site was surplus and that requirement had to be removed as a mod. There is no relevant change in circumstance. However, new public open space is required, and it is noted that this could be an extension of the adjacent playing field.	The Council's response is accepted, and Sport England's initial objection is now resolved.
SPS7 Kassam Stadium	The Kassam stadium has an existing playing field and this will need to be addressed in the policy. The stadium cannot be redeveloped until a new stadium for Oxford United has been provided. Whilst the replacement Oxford United ground has been permitted in Cherwell, it	The following text could be added to the policy; 'Development of the Kassam Stadium football pitch, stands and access shall not be commenced until the replacement stadium (insert Cherwell planning application	Policy SPS7 currently says: <i>The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected.</i>	The proposed modifications would help to overcome Sport England's objections.

	will take time for a new ground to be constructed. It is therefore important that the Council retains its existing local plan requirement to protect the stadium (Policy SP14);	reference) has been implemented and made available for use.’ Otherwise the football team could have a period of years without a stadium, other examples where this has occurred include Truro City (returning to their ground this year after a period of 3-4 years) and Newport FC on the Isle of Wight (whose plans for a new ground have stalled).	It is not considered justified to go as far as your suggested amendment, however, we would be happy to propose a mod that adds a requirement for the applicant to show consideration for how existing users of the stadium could be accommodated should there be a delay in a new venue coming forward if this would help to alleviate your concerns, for example: <u><i>XX) Proposals should include details setting out how existing users of the stadium site could be accommodated elsewhere if alternative facilities are not yet available.</i></u>	
SPE7 Lincoln College Sports Ground (And SPE4 Jesus College Sports Area)	This site is adjacent to Jesus College sports area (SPE4). Sport England also objects to the inclusion of these playing fields within the Local Plan, particularly as the Council has not completed its Playing Pitch Strategy (see also comments on evidence base under G1) and the PPS document currently does not cover tennis.	The policy is not consistent with national planning policy, positively prepared or justified (NPPF paragraph 103) and should be removed from the plan.	The Policy assumes replacement on site, and currently says: <i>c) There is potential to consolidate and share sports provision with the neighbouring Jesus College Sports Area (Policy SPE4). If sports provision can be shared and still provide the same capacity to meet playing pitch needs, then a larger area of the site(s) could be developed. Contributions could be made to improving a local facility such that its capacity increase replaces what is lost on the site(s).</i> Following our further discussions in relation to Sport England’s concerns, we would be happy to propose the following modification:	The proposed modification would help to overcome Sport England’s objection.

			<i>c) There is potential to consolidate and share sports provision with the neighbouring Jesus College Sports Area (Policy SPE4). If sports provision can be shared and still provide the same capacity to meet playing pitch needs, then a larger area of the site(s) could be developed. Contributions could be made to improving a local facility such that its capacity increase replaces what is lost on the site(s).</i> <u><i>Reference will need to be made to the Playing Pitch Strategy.</i></u>	
SPE16 Thornhill Park	This site is adjacent to Risinghurst Cricket Club and there is potential for ball strike from cricket balls used on the playing field. The proposals also appear to support the loss of the pavilion used by the sports clubs on the adjacent playing field. It is not clear from aerial images but the proposal site may be existing playing field and its existing use should be reviewed through work on the Council's playing pitch strategy. Sport England objects to criteria (d) as this has not been evidenced by the Council and is not compliant with paragraphs 103 or 104 of the NPPF.	Criteria (d) should be amended to; 'Proposals for development must include a replacement pavilion for the adjacent playing fields' The policy should also include; 'Consideration be given to any issues resulting from ball strike from the adjacent cricket ground if ball stop fencing is required along the site boundary this should form part of the planning application'. Currently Sport England considers the policy does not meet the soundness tests.	The site does contain a disused playing field although Sports England comments on the previous planning application for the site (21/01695/FUL) were that the site is not considered to form part of or constitute a playing field as defined by the Town and County Planning Order and had not raised an objection. When the previous permission was granted for the site, a contribution towards a replacement pavilion for the pitch to the south of the site was agreed in order to satisfy requirements of LP2036 policy G5 on outdoor sports which protects the open space at present. Criteria d of the LP2045 policy carries forward this requirement and we are therefore unclear on the justification for the alternative wording you propose.	Thank you for the explanation and the proposed modification would overcome the objection.

			In relation to your other points, we suggest an additional criterion could be added under the 'additional requirements' to respond to your point about ball strikes. Additional criterion to be proposed as a mod as follows: <u><i>n) The site is adjacent to a playing field used for cricket and as such design proposals should give consideration to the need for appropriate ball stop fencing at the boundary of the site to mitigate risks of ball strikes so that those uses can continue to be supported there.</i></u>	
SPE18 Warneford Hospital	This site contains a former playing field that may be needed by the community. A planning application is in progress on the site. The national planning policy framework is clear that playing fields should be protected from loss.	As new housing is being proposed within this location, the Council should work with the applicant to retain the playing field within the wider site to provide a sports facility that will benefit the wider community.	LP2036 established (and LP2045 carries forward) that: <i>loss of the former sports facility is considered justified only due to the need for and benefits of new hospital development.</i> Nevertheless, the open space is identified as supporting GI through Policy G1 and that policy sets out requirements for mitigating losses more generally.	The Council's response is accepted, and Sport England's initial objection is now resolved.
SPCW10 Oxpens	Sport England objects to this policy as whilst it refers to granting permission for leisure development it does not reference retaining the ice rink and should be amended to make it clear in the text that the ice rink will be retained. Sport England is further concerned about the impact of this development on the ice rink. This is a regionally important facility and parking may therefore be required to support events. The viability of the ice rink as	The following text should be added with the following heading – 'Existing sports facilities': 'Development proposals for the site should ensure that the ice rink is retained within the site and information should be provided by the applicant to demonstrate that the operation of the ice rink will not be adversely affected by the proposals.'	The ice rink is an in-use facility and other policies protect this use (although there is no justification for protecting it as it is and on the site). The other policies could be cross-referenced if that would be helpful, although this is not considered necessary. It is agreed that a modification be proposed to add an additional criterion as follows:	The modification proposed would overcome Sport England's objection.

	a venue may also be adversely impacted by development adjacent to it (for example, construction). The impact could potentially be so significant that these considerations should be explored and evidence presented before such a large allocation is made. As currently drafted, Sport England considers that the policy does not adequately protect the ice rink facility. The proposed wording as written also appears to suggest that development on the existing open space in this location is acceptable. Policy is contrary to NPPF paragraphs 103 and 104 and therefore fails the relevant soundness test and the lack of evidence provided in relation to indoor sports facilities within the plan means that it has not been positively prepared or adequately justified.	The existing open space that will be retained should be shown on the proposals map if it is affected by the development.	<u><i>XX) The ice rink is a regionally important facility and proposals which could impact upon this venue will need to accord with the requirements of Policy C3.</i></u>	
General planning for sports infrastructure	The Council has not undertaken any new work looking at existing (or the need for new) indoor sports facilities in Oxford. This work is needed to inform the Council's infrastructure delivery plan and decisions about the community infrastructure levy in Oxford. There will also be needs arising from city residents for indoor sports facilities and to support policies such as SPCW10: Oxpens. It is recommended that with the increase in residents expected in Oxford, this important work is started without delay.		The Local Plan has limited control over many types of indoor sports facilities; however, where we can, the approach is to seek to protect what we have through policies such as Policy C3. Where a particular allocation could impact a use – the impact has been considered and wording incorporated into the allocation to deal with any re-provision requirements. Whilst there is not a specific new study focused solely on indoor sports, the evidence base includes the Oxford Retail, Leisure and Town Centre Needs Study and this did look at a	The Council's response is accepted, and Sport England's initial objection is now resolved.

			high level at commercial leisure needs including indoor sport.	
SPE2 East Oxford Bowls Club	It is proposed to develop this former bowls club site. The Council has not provided evidence within the local plan to demonstrate that the bowls site is no longer needed for bowls but also to investigate whether alternative sport and recreation could be accommodated on the site.	Evidence should be provided that considers whether the bowls provision is still needed in this area and if not then what alternative sports and recreation provision could be accommodated on this site.	This site is considered to meet the test of being surplus to requirements. The bowls club folded over 20 years ago due to lack of interest and there has been no use of the site since. The pavilion it once housed burnt down. It is and has been for a very long time entirely closed off and unused.	The Council's response is accepted, and Sport England's initial objection is now resolved.
SPS3 Bertie Place	This recreation ground has amenity and play value for the local community, it's place on the site allocations list should be reviewed. The planning application 23/00988/FUL remains undecided.	In light of the community representation on planning application 23/00988/FUL, the Council may wish to consider whether to deallocate this site.	Policy sets out that a public playground and MUGA should be re-provided on site at Bertie Place. The open space is also designated as supporting GI through policy G1 and as such any proposal that results in loss/harm will need to be mitigated in line with that policy's requirements.	The Council's response is accepted, and Sport England's initial objection is now resolved.
SPS15 Sandy Lane Recreation Ground	Sport England objects to the allocation of these community playing fields which are actively used by local sports teams (principally football) and Sport England has had a number of residents contact us raising concerns about the allocation of this site who weren't aware of its allocation in the previous Local Plan. Sport England welcomes the inclusion of criteria (a) and (c) but these are insufficient to secure the protection of these playing fields from development which provide for community sport in the city in addition to recreation use. If the Council means that the playing field will be moved and replaced	Sport England recommends that the site is removed as an allocation in the Local Plan unless a new allocation can be introduced that shows where the community playing field can be replaced in Oxford.	The policy has been drafted on the assumption that pitches are to be relocated; however, the requirements are worded in a way that allows both situations to be addressed (pitches are relocated or retained) and sets out what is expected (specifically that reprovision of pitch capacity on or offsite will be needed where existing pitches are lost). An allocation for new pitches is not considered necessary to ensure that these requirements are carried out, the policy includes the requirements which will need to be demonstrated by the applicant through the application.	Sport England's objection remains unresolved for the time being, however, it is agreed that this could be resolved through the proposed course of action in relation to the PPS.

	elsewhere then the policy should state this and an alternative site should be allocated within this Local Plan. Sport England does not support criteria (b). The current site functions as one whole with the ability to move pitch layouts within it and support multiple teams from the same club (different age groups) on site together. Whilst Sport England would support quality improvements to the existing playing field this would not be sufficient compensation for the loss to community football. Improving quality without retaining the same quantity means that there is less space for play to take place on. It is preferable to have a large site playing field rather than a single pitch site as these are expensive to maintain. Page 25+ of our Playing Fields Policy contains more information about what to consider when seeking to replace playing field.		On the point about retaining quantity and the concerns about the wording of criterion b, we have generally worked to date on the understanding that in our constrained context, the key requirement in looking for any reprovision is about ensuring existing capacity of a site's pitches is not lost, rather than a like for like replacement in terms of size/number of pitches. That is the rationale behind the criterion setting out that there could be opportunities to enhance quality to improve capacity where the overall quantity of pitches is consolidated (though it does not state this is the only way the pitches could be addressed). Of course, the applicant would need to explore this further through the planning application process and demonstrate that their approach to reprovision sufficiently mitigates any losses. As you will be aware, the development of the new PPS will proceed onto scenario testing stages further along in the project, which will help to inform the subsequent action plan for the strategy. We had already envisaged that this would include some element of scenario testing related to the Local Plan proposals. Whilst the specific scenarios to be tested will need to be agreed at the relevant point in the timetable for the PPS project and with the wider	
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			steering group, we could put forward that scenario testing potentially explore the impact of any shortages caused by development at Sandy Lane and how any loss of sports provision could be mitigated - particularly if this can help to address your ongoing concern. We would therefore propose that for the moment we capture this as an area of unresolved objection but one that could be resolved in due course through the PPS project, and that this is an area we will continue to work together to resolve throughout the examination.	
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