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OXFORD CITY COUNCIL

Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Vicky Aston

Organisation (if applicable): Sport England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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	Yes	No
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Do you wish to be notified when:		
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DETAILS OF YOUR COMMENT

Part B

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	C3	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	☐
(b) justified?	☐	(d) consistent with national policy?	☐

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Sport England considers that draft Policy C3 cannot be applied effectively to built sports facilities and that a separate policy for protecting (and encouraging the improvement and new types of) these type facilities is needed (see also comments on draft Policy G1). The emerging NPPF reaffirms that there is a separation between the policies for sport and recreational facilities and other types of community facilities.
With regard to new facilities the policy also states that the location must be 'easily accessible by walking, cycling and public transport' and 'the proposal will 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.

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Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Sport England considers that a separate policy in the paragraph 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.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

85 – Sport England **Policy C3 Readable response**

Q4:

Sport England considers that draft Policy C3 cannot be applied effectively to built sports facilities and that a separate policy for protecting (and encouraging the improvement and new types of) these type facilities is needed (see also comments on draft Policy G1). The emerging NPPF reaffirms that there is a separation between the policies for sport and recreational facilities and other types of community facilities.

With regard to new facilities the policy also states that the location must be 'easily accessible by walking, cycling and public transport' and 'the proposal will 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.

Sport England also strongly objects to the paragraph in draft policy C3 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 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. Sport England advises that with regard to indoor sports facilities the policy does not comply with national planning policy and has not been positively prepared or justified (no evidence has been prepared for indoor sports facilities.

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Paragraph		Policies Map	
Policy Number	C4	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	✓
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Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

The policy must be clear that any playing fields on education sites (use class F1) are protected from development otherwise the policy is not compliant with national policy.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

School playing fields should be protected from development and assessed against the relevant tests set out in national policy and Policy G1.

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	G1	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☒ Yes	☐ No
(b) is sound?	☐ Yes	☒ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

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Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Sport England acknowledges that the Council has made amendments to the policy but considers that this policy has still not been positively prepared as 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 paragraph 103 are met (see further comments made in relation to evidence base). NPPF paragraphs 103 and 104 refer to the importance of planning for open space, sport and recreational provision. This wording is important as it ensures that the ancillary facilities, such as changing rooms, artificial pitches and sports courts and MUGAs on playing field sites are also protected from development. Sport England is also very aware that the Council is continuing to include playing field sites within the site allocations that we continue to object to, rather than protecting them through policy as both the adopted and the emerging NPPF require

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

The policy and the plan do not plan any new sport and recreation facilities or identify new opportunities to meet needs and we are 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. T

The plan should include supportive policies for new sport facility developments. e.g. 'Proposals for sport and recreation facilities will be encouraged and supported in line with other policies in the Plan and Sport England guidance.' And
'The Council will seek to 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.' Proposals affecting sports facilities should be considered against the tests set out in the NPPF para 104.

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This is the end of the comment form

85 – Sport England Policy G1 Readable response

Q4:

Sport England acknowledges that the Council has made amendments to the policy but considers that this policy has still not been positively prepared as 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 paragraph 103 are met (see further comments made in relation to evidence base). NPPF paragraphs 103 and 104 refer to the importance of planning for open space, sport and recreational provision. This wording is important as it ensures that the ancillary facilities, such as changing rooms, artificial pitches and sports courts and MUGAs on playing field sites are also protected from development. Sport England is also very aware that the Council is continuing to include playing field sites within the site allocations that we continue to object to, rather than protecting them through policy as both the adopted and the emerging NPPF require the Council to do.
We therefore consider the amendments made to the policy are not sufficient. 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.

Q5:

(Note first 3 paras are suggested changes, the rest are comments on evidence base (Playing Pitch Strategy))

The policy and the plan do not plan any new sport and recreation facilities or identify new opportunities to meet needs and we are 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.
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'The Council will seek to 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.'
Proposals affecting sports facilities should be considered against the tests set out in the NPPF para 104.

Evidence base (a separate form has not been made available for comments on the evidence base so I have included them here);

Sport England has highlighted in our representations on policies G1, G2, C3 and other policies including the site allocations that 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. 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, Sport England strongly objects to the inclusion of the KKP interim report Oxford City Playing Pitch Strategy Local Plan Interim report within the Oxford City Local Plan evidence base. Tennis and padel also need to be covered within the Council's evidence base.

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 to assess current and future needs in line with Sport England's recommended method and paragraph 103 of the National Planning Policy Framework. The Playing Pitch Strategy is also required to provide up to date information for the Council's Infrastructure Delivery Plan.

The Report concludes on page 8 and 9 that 'most of the current shortfalls can likely be met by better utilising current provision'. We further dispute this statement within the conclusion that 'no new playing field will need to be created'.

These are premature conclusions as the data used in this report has not been checked and signed off by the national governing bodies, nor has the demand from all of the sports been assessed. The sport national governing bodies include England & Wales Cricket Board, Oxfordshire Cricket Board, England Hockey, Rugby Football Union, Football Foundation and the Oxfordshire Football Association. For example, at a partial steering group for the PPS last week with the Football Foundation and Football Association on 9/03/2026, it was identified that further demand information had not yet been collected for the study. Stage B of the Playing Pitch Strategy (gather information and views on the supply of and demand for provision) has not been completed. For many sports (including cricket), data collection for this study has not been started due to the work being started after last summer. Sport England works closely with local authorities, consultants and the sport national governing bodies to ensure that these studies provide a robust evidence base for assessing need in line with paragraph 103 of the National Planning Policy Framework and Sport England guidance.

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Policy Number	G2	Sustainability Appraisal	

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	☐	☐

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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. For example, there are playing fields with in 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 in this policy it is silent on seeking to improve playing fields and other sports facilities in line with paragraph 103 of the NPPF. Sport England considers that in the context of paragraph 103, the plan has not been positively prepared and is not consistent with national policy.

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Please also see our 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 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.

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Policy Number	G6	Sustainability Appraisal	

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Sport England is concerned about what this policy means for any playing fields or other sports facilities within these designated area. 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.

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Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Amendments are required to Policy G1 (please see other comments) or this policy to confirm that the City Council will support proposals that; 'Proposals for sport and recreation facilities will be encouraged and supported in line with other policies in the Plan and Sport England guidance'. So that any proposals for new pavilions or improvements to existing sports facilities will be supported.

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	Yes	No
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DETAILS OF YOUR COMMENT

Part B

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	R8	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☒ Yes	☐ No
(b) is sound?	☐ Yes	☒ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	✓
(b) justified?	☐	(d) consistent with national policy?	✓

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Where new sports facilities are proposed this may mean additional traffic. But there is no explanation of 'unacceptable transport impact' is.
Sport England is further concerned that draft Policy R8 applies to planning applications for sports lighting. Were this policy to apply to sports lighting or lighting of streets to support active travel, the policy gives no acknowledgement of the benefits of outdoor sports lighting or street lighting to providing health communities. At present the policy strongly favours 'the amenity of communities, occupiers, neighbours and the natural environment' (see bullet point a). And it is not clear how the policy will be applied.

The same applies for new outdoor sports facilities. The policy states; 'Planning permission will

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Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

In conclusion the plan does not acknowledge the benefits lighting can bring to active travel and outdoor sports facilities, or considers agent of change so it is considered that it in this respect it is not justified or consistent with national policy as it does not provide adequate support for planning applications that could bring forward sport and recreational provision that is needed in the City. 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.

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85 – Sport England **Policy R8 Readable Response**

Q4:

Where new sports facilities are proposed this may mean additional traffic. But there is no explanation of 'unacceptable transport impact' is.
Sport England is further concerned that draft Policy R8 applies to planning applications for sports lighting. Were this policy to apply to sports lighting or lighting of streets to support active travel, the policy gives no acknowledgement of the benefits of outdoor sports lighting or street lighting to providing health communities. At present the policy strongly favours 'the amenity of communities, occupiers, neighbours and the natural environment' (see bullet point a). And it is not clear how the policy will be applied.

The same applies for new outdoor sports facilities. The policy states; 'Planning permission will not be granted for development sensitive to noise in locations which experience high levels of noise, unless it can be demonstrated through a noise assessment, that appropriate attenuation measures will be provided to ensure an acceptable level of amenity for end users and to prevent harm to the continued operation of existing uses.' 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 for the development of this policy, although it is now 10 years old and due for an update;
https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/artificial-grass-pitches-acoustics-planning-implications

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.

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OXFORD CITY COUNCIL

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COMMENT FORM

Part A

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Your name: Vicky Aston

Organisation (if applicable): Sport England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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Paragraph	SP2	Policies Map	
Policy Number		Sustainability Appraisal	

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Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

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.

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Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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.

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SP3	Sustainability Appraisal	

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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.

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Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

In light of the community representation on planning application 23/00988/FUL, the Council may wish to consider whether to deallocate this site.

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Paragraph		Policies Map	
Policy Number	SPS4	Sustainability Appraisal	

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(b) is sound?	☐ Yes	☐ No
	☐	☐

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Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Sport England requests amendments are made to this policy to to protect use of adjacent community playing field.

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Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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.'

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Address: [redacted]

Email: [redacted]

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SPS6	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No
	☐	☐

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Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

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.

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Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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.

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Policy Number	SPS7	Sustainability Appraisal	

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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 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);

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Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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 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).

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planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SPE7	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	☑	(c) effective?	☐
(b) justified?	☑	(d) consistent with national policy?	☑

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

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.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

The policy is not consistent with national planning policy, positively prepared or justified (NPPF paragraph 103) and should be removed from the plan.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

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OXFORD CITY COUNCIL

Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Vicky Aston

Organisation (if applicable): Sport England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

Data protection:
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	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SPE16	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	✓
(b) justified?	☐	(d) consistent with national policy?	✓

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

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 adjacent playing field (d) https://risinghurstandsandhills-pc.gov.uk/wp-content/uploads/2025/09/RPFCIO-Annual-Report-and-Accounts-24-25.pdf
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.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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.

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OXFORD CITY COUNCIL

Oxford Local Plan 2045

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COMMENT FORM

Part A

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Your name: Vicky Aston

Organisation (if applicable): Sport England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SPE18	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	✓	(c) effective?	
(b) justified?	✓	(d) consistent with national policy?	✓

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

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.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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.

Please use an extra sheet if completing a paper copy.

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COMMENT FORM

Part A

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Your name: Vicky Aston

Organisation (if applicable): Sport England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SPN4	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?	✓	(c) effective?	✓
(b) justified?	✓	(d) consistent with national policy?	✓

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

This site is actively used by local community sports teams, including Oxford Cricket Club. It has a cricket 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.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

This site allocation should be removed from the Plan.

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OXFORD CITY COUNCIL

Oxford Local Plan 2045

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COMMENT FORM

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Your name: Vicky Aston

Organisation (if applicable): Sport England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	CBLAOF	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?	✓	(c) effective?	✓
(b) justified?	✓	(d) consistent with national policy?	✓

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

This site area includes a number of sport and recreation facilities that are important to the local community. For example, the 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.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

The policy should be updated to seek improvements to the playing fields and sports facilities within this area. The 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.

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COMMENT FORM

Part A

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Organisation (if applicable): Sport England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	NEOAOF	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?	✓	(c) effective?	✓
(b) justified?	✓	(d) consistent with national policy?	✓

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

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.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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.

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OXFORD CITY COUNCIL

Oxford Local Plan 2045

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COMMENT FORM

Part A

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Your name: Vicky Aston

Organisation (if applicable): Sport England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SP15	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	✓	(c) effective?	✓
(b) justified?	✓	(d) consistent with national policy?	✓

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

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 elsewhere then the policy should state this and an alternative site should be allocated within this Local Plan.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

85 – Sport England **Policy SPS15 Readable response**

Q4:

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 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. https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/playing-fields-policy

www.oxford.gov.uk

OXFORD CITY COUNCIL

Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Vicky Aston

Organisation (if applicable): Sport England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

Data protection:
Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

- [x] If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.
- [ ] If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
T: 01865 252847
planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	SPCW10	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is not: (tick as appropriate)

(a) positively prepared?	✓	(c) effective?	✓
(b) justified?	✓	(d) consistent with national policy?	✓

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Sport England objects to this policy as whilst it refers to granting permission for leisure development it does not reference retaining the ice rink. The policy 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 a venue may also be adversely impacted by development adjacent to it (for example, construction). The impact could potentially be so significant that the Sport England 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 icer

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

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 existing open space that will be retained should be shown on the proposals map if it is affected by the development.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

85 – Sport England **Policy SPCW10 Readable response**

Q4:

Sport England objects to this policy as whilst it refers to granting permission for leisure development it does not reference retaining the ice rink. The policy 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 a venue may also be adversely impacted by development adjacent to it (for example, construction). The impact could potentially be so significant that the Sport England 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 icer rink facility. The proposed wording as written also appears to suggest that development on the existing open space in this location is acceptable. Sport England considers that the policy as is contrary to national policy as set out 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.

Comment on the Council's planning for sporting infrastructure (as no separate form not available to cover this);

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. Iti is recommended that with the increase in residents expected in Oxford, this important work is started without delay.