

# Minutes of a meeting of the Cabinet on Wednesday 18 October 2023

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## Cabinet members present:

Councillor Brown

Councillor Turner

Councillor Chapman

Councillor Hunt

Councillor Railton

Councillor Linda Smith

Councillor Upton

## Officers present for all or part of the meeting:

Tom Bridgman, Executive Director (Development)

David Butler, Head of Planning and Regulatory Services

Lucy Cherry, Policy and Partnerships Officer

Rose Dickinson, Carbon Reduction Team Manager

Sarah Harrison, Team Leader (Planning Policy)

Tom Hook, Executive Director (Corporate Resources)

Emma Jackman, Head of Law and Governance

Nigel Kennedy, Head of Financial Services

Emma Lund, Committee and Member Services Officer

Tina Mould, Capital Programme Project Manager

Mish Tullar, Head of Corporate Strategy

Rachel Williams, Planning Policy and Place Manager

## Apologies:

Councillors Munkonge and Rehman sent apologies.

## 66. Addresses and Questions by Members of the Public

Helen Marshall, on behalf of CPRE Oxford, had submitted a representation relating to the Oxford Local Plan 2040 Regulation 19 Consultation Document.

Kaddy Beck, on behalf of the Save Bertie Park Campaign, addressed Cabinet on the subject of the Oxford Local Plan 2040 Regulation 19 Consultation Document.

Both statements, and the responses provided, are attached to these minutes.

## 67. Councillor Addresses on any item for decision on the Cabinet agenda

None.

## 68. Councillor Addresses on Neighbourhood Issues

None.

## **69. Items raised by Cabinet Members**

None.

## **70. Scrutiny reports**

The Climate and Environment Panel had met on 12 September 2023; the Housing and Homelessness Panel had met on 5 October 2023 and the Scrutiny Committee had met on 10 and 16 October 2023. Recommendations had been made at those meetings relating to:

- (i) Air Pollution
- (ii) Delivery of Electric Vehicle Infrastructure for Oxford
- (iii) Oxford Local Plan 2040 Regulation 19 Consultation Document

In the absence of the Chair of the Scrutiny Committee, Cabinet noted the recommendations during consideration of the individual agenda items. Responses had been provided in a separately published supplement, and the scrutiny recommendations had been largely accepted.

In relation to Air Pollution, which was not on the Cabinet agenda, it was noted that the Climate and Environment Panel had made two recommendations which related to (i) producing an accessible summary of the annual Air Quality Status Report and (ii) considering how to identify and promote the broader benefits of action to improve air quality. Both recommendations had been accepted.

## **71. Oxford Local Plan 2040 Regulation 19 Consultation Document**

The Head of Planning and Regulatory Services had submitted a report to seek approval for the Oxford Local Plan 2040 Proposed Submission Document for public consultation and recommend to Council its approval for consultation and, subject to the outcome of the consultation, if no matters are raised that materially impact upon the Plan strategy, submit the Submission Draft Oxford Local Plan 2040 to the Secretary of State for formal examination.

Councillor Louise Upton, Cabinet Member for Planning and Healthier Communities, highlighted the importance of the Local Plan in achieving the Council's goals, which included ensuring that future developments did not adversely affect climate change, and tackling the issue of unaffordability of housing for many of Oxford's residents. Councillor Upton outlined that the draft Local Plan incorporated a broad range of policies covering areas such as protecting the world class heritage buildings of the city whilst ensuring that they could adapt to climate change; protecting district and local centres so that valued services remained close at hand for residents; ensuring that Oxford remained a vibrant and attractive place to live; requiring a higher level of social housing within developments than in neighbouring districts; and ensuring that Oxford's residents benefitted from a thriving economy by being able to access well-paid jobs. Policies had also been included relating to affordable workplaces being provided in large developments; allowing the loss of some badly placed employment land to housing whilst allowing densification of employment at sites closest to transport hubs; increasing biodiversity by 10% within developments; and encouraging greening of the urban environment. Councillor Upton highlighted the innovative nature of many of these policies.

Cabinet noted that the Scrutiny Committee had considered the report on 16 October and had made eight recommendations. Of these, six had been accepted. Several minor changes had been made to the document as a result, which had mostly related to points of clarification. Two recommendations had not been accepted. These related to the definition

of a Local Centre and the list of Local Centres. The response had outlined the process which had been undertaken to define the list and its appropriateness, and signposting the definition of a Local Centre which was shown in the glossary.

Cabinet resolved to:

1. **Recommend to Council** that it approves the Oxford Local Plan 2040 Proposed Submission Document for consultation;
2. **Recommend to Council** that it approves the following supporting statutory documentation: the Sustainability Appraisal, Habitats Regulation Assessment, Infrastructure Development Plan (IDP) and Equalities Impact Assessment;
3. **Authorise** the Head of Planning and Regulatory Services, in consultation with the Cabinet Member for Planning and Healthier Communities, to make any necessary minor typographical changes and modifications to the proposed submission document, IDP, Sustainability Appraisal and Habitat Regulations Assessment, and to agree the final publication style of the draft version before publication; and
4. **Authorise** the Head of Planning & Regulatory Services, in consultation with the Cabinet Member for Planning and Healthier Communities, to make any minor changes to the document following publication which are deemed necessary as a result of the consultation, and then to formally submit the Oxford Local Plan 2040 to the Secretary of State for examination. In the event that significant issues are raised that suggest the Plan is not sound and major amendments are required, the Plan will need to be re-drafted and brought back to Council to approve another public consultation before submission.

## 72. Partial CIL Charging Schedule Review

The Head of Planning and Regulatory Services had submitted a report to seek approval for the Draft CIL Charging Schedule to be published for public consultation.

Councillor Louise Upton, Cabinet Member for Planning and Healthier Communities, outlined that the Community Infrastructure Levy (CIL) was a tariff charged on new developments. The CIL charging schedule had been reviewed to assess whether the tariffs were still at the appropriate level, or whether any changes were needed as a result of changing circumstances. The review had determined that for most of the use classes an increase in the CIL rate would result in developments becoming unviable. However, there were three business class uses where the amounts had been set much lower than that of housing land. It was considered that these would remain viable with much higher CIL rates and it was therefore proposed to increase these from £31.50 per sqm to £158.00 per sqm, which was in line with the charges for many other types of development including housing.

Cabinet resolved to:

1. **Approve** the Community Infrastructure Levy (CIL) Draft Charging Schedule to be published for public consultation (Appendix 1);
2. **Authorise** the Head of Planning and Regulatory Services, in consultation with the Cabinet Member for Planning and Healthier Communities, to make any minor typographical changes to the Draft Charging Schedule before publication; and

3. **Authorise** the Head of Planning and Regulatory Services to formally publish the Draft Charging Schedule and associated evidence base for public consultation.

### 73. Delivery of Electric Vehicle Infrastructure for Oxford

The Head of Corporate Strategy had submitted a report to (i) seek approval for Oxford City Council's Electric Vehicle Infrastructure (EVI) Delivery and Implementation Plan, which clarifies the work packages and resources needed to deliver the first chapter of Oxford's EVI strategy (OxEVIS) up to April 2026; (ii) seek delegated authority for officers to enter into contracts and agreements with third parties to deliver the OxEVIS Implementation Plan; and (iii) agree to changes to the GULO (Go Ultra Low Oxford) project.

Councillor Anna Railton, Cabinet Member for Zero Carbon Oxford and Climate Justice set out the background to the report, principally the increasing shift in responsibility for electric vehicle infrastructure (EVI) to Tier 1 authorities. In this context, Oxfordshire County Council had expressed the wish to take full control of EVI on the highways, including the existing installed Go Ultra Low Oxford (GULO) estate and future GULO phase 2 deployment which had to date been managed by the City Council. The report therefore sought the required authorities and delegations to allow the various contract arrangements, stock and remaining funding to be migrated. It also signalled the County Council's intention to honour Oxford City Council's existing EVI strategy.

Four scrutiny recommendations had been made, which had all been accepted.

Cabinet Members expressed regret that the City Council would not be able to oversee its own infrastructure strategy to fruition, or fully benefit from projects in which resources of time and investment had been made. It was noted that Oxford City Council could still install its own EVI on land which it owned (such as city-owned car parks and park and ride), and potentially on third party land through back-to-back contract agreements.

Cabinet resolved to:

1. **Approve** the draft Implementation Plan for the Council's Electric Vehicle Infrastructure Strategy (OxEVIS) delivery as set out in Appendix 4 and **delegate authority** to the Head of Corporate Strategy in consultation with the Cabinet Member for Planning and Healthier Communities and the Cabinet Member for Zero Carbon Oxford and Climate Justice to make amendments to the Implementation Plan where required to ensure delivery of the OxEVIS;
2. **Delegate authority** to the Head of Corporate Strategy, in consultation with the Cabinet Member for Planning and Healthier Communities, the Cabinet Member for Zero Carbon Oxford and Climate Justice, the Head of Financial Services/Section 151 Officer, and the Council's Monitoring Officer, to enter into partnerships and collaborative working arrangements with third parties as required to deliver the Implementation Plan;
3. **Delegate authority** to the Head of Corporate Strategy, in consultation with the Cabinet Member for Planning and Healthier Communities, the Cabinet Member for Zero Carbon Oxford and Climate Justice, the Head of Financial Services/Section 151 Officer, and the Council's Monitoring Officer, to accept tenders and enter into concession contracts (within the constraints set out in paragraph 39 of this Cabinet report) for the purposes of delivering the Implementation Plan;

4. **Delegate authority** to the Head of Corporate Strategy, in consultation with the Cabinet Member for Planning and Healthier Communities, the Head of Financial Services/Section 151 Officer, and the Council's Monitoring Officer, to give grants for the purposes of delivering the Implementation Plan up to an aggregate value of £500k;
5. **Delegate authority** to the Head of Corporate Strategy, in consultation with the Head of Corporate Property, the Cabinet Member for Planning and Healthier Communities, the Head of Financial Services/Section 151 Officer, and the Council's Monitoring Officer, to enter into leases up to a rental value of £5M for the purposes of delivering the Implementation Plan;
6. **Note** the interdependency with the funding bid under the standard 2024 MTFP budget setting process (detail as per Table 1 of the report). Over the four year budget period this implementation plan delivers an estimated net income of £24k. Net income for 2029-2040 is estimated at up to £5.2M;
7. **Agree** the On-street elements of the Go Ultra Low Oxford project (GULO) transition from Oxford City Council delivery to Oxfordshire County Council delivery, subject to the following conditions being fulfilled:
  - a. The County Council is satisfied that it can meet the funding obligations within the GULO funding agreement;
  - b. The funding body for GULO agrees (Office for Zero Emission Vehicles/OZEV) for the transfer to take place;
  - c. There is an agreement by both Councils on the methodology for delivery of the key outputs of GULO Phase 2, including the number of electric vehicle charging points and cable channels (GUL-e) committed under GULO are delivered to updated timeframes that are agreed with Oxford City Council and the funding body;
  - d. The existing GULO estate and highways related GULO Phase 2 funding are both transferred; and
  - e. An updated partnership agreement, including a revenue share arrangement for the assets associated with GULO is put in place that recovers the City Council investment to date; and
8. **Note** the reduction of Oxford City Council control over delivery of the OxEVIS Strategy due to national delegation of Local Electric Vehicle Infrastructure (LEVI) grant deployment to tier 1 authorities. Moving from overseeing city-wide delivery of OxEVIS to collaborating with Oxfordshire County Council on relevant OxEVIS policies related to highways EV Infrastructure deployment.

## 74. Utilities Procurement 2024 - 2028

The Head of Corporate Strategy had submitted a report to seek delegated authority for the Head of Corporate Strategy, in consultation with the Head of Financial Services / Section 151 Officer, to approve contracts for gas and electricity and agree to extend the current contract for water utilities.

Councillor Anna Railton, Cabinet Member for Zero Carbon Oxford and Climate Justice outlined that the report set out options for re-procurement of utilities contracts which were due to expire in October 2024. The Council had, since 2004, purchased energy on a framework agreement with LASER (Local Authority South East Region), a Public Buying Organisation. Options for re-procurement included buying into a new Public Buying Organisation contract, which was currently the preferred option. The report also reiterated the Council's decision not to buy green electricity due to high premiums, but to instead use the price gap to deliver projects which decarbonised the Council's operations. This was a pragmatic decision which had been taken on the advice of the Council's scientific advisor.

Authorisation was also sought to extend the current water contract, which would expire in September 2024, with a recommendation to exercise the option to extend existing contract for a further two years on the same terms, conditions and pricing.

It was noted that an Energy Procurement Review was proposed within the next six months or so, to inform the Council's longer-term approach from 2027 onwards.

Cabinet resolved to:

1. **Delegate authority** to the Head of Corporate Strategy, in consultation with the Head of Financial Services / Section 151 Officer, to:
  - decide the procurement route for purchasing the supply of gas and electricity from October 2024
  - agree to enter into contracts for gas and electricity, subject to a maximum term of four years from October 2024;
2. **Approve** the extension of the Council's water contract with Wave for a further two years; and
3. **Note** the proposal to undertake an Energy Procurement Review to inform the Council's longer-term approach (from 2027 onwards).

## **75. Local Government Association (LGA) Corporate Peer Challenge**

The Chief Executive had submitted a report to update members on the key scope, process and recommendations from the July 2023 Peer Review Team and to outline the future Action Plan.

Councillor Susan Brown, Leader and Cabinet Member for Inclusive Economy and Partnerships commented that the peer review had been a helpful process which had been reassuring in many aspects but had also involved challenge. Ten recommendations had been made, which were set out in the report. Work had already started on a number of these, and an action plan was being developed proactively by the Corporate Management Team and was expected to be brought to Cabinet in December. This would include commentary on areas which it was felt hadn't been properly communicated at the time of the peer review. A progress review would be undertaken by the LGA in March and April of 2024.

A Cabinet Member commented that the LGA's compressed timescale for progress reporting and review meant that the impact of actions against some of the recommendations (for example, training for new Councillors) may not be able to be

fully assessed at that time. It was agreed that it would be helpful to have a further update to Cabinet in a year's time, to allow for a fuller internal review of progress.

Cabinet resolved to:

- 1. **Note** the Local Government Peer Challenge Feedback report of July 2023; and
- 2. **Note** the recommendations from the Peer Review Team and that the Chief Executive has already commenced action planning to address these.

**76. Minutes**

**Cabinet resolved to approve** the minutes of the meeting held on 13 September 2023 as a true and accurate record.

**77. Dates of Future Meetings**

Meetings are scheduled for the following dates:

- 15 November 2023
- 13 December 2023
- 24 January 2024
- 7 February 2024
- 13 March 2024
- 17 April 2024

All meetings start at 6pm.

**The meeting started at 6.00 pm and ended at 7.01 pm**

**Chair .....**

**Date: Wednesday 15 November 2023**

*When decisions take effect:*  
*Cabinet: after the call-in and review period has expired*  
*Planning Committees: after the call-in and review period has expired and the formal decision notice is issued*  
*All other committees: immediately.*  
*Details are in the Council's Constitution.*

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Address submitted by Helen Marshall on behalf of CPRE Oxford

Oxford is host to a wide range of community, environmental and civic organisations all of whom are committed to working for a sustainable future for our amazing City.

Imagine how strong a Local Plan could be if it harnessed the passion and expertise of these groups in a co-ordinated way and genuinely involved them in the development of the Local Plan?

Instead, it seems that we are once again here in a position of tick box consultation with groups that have concerns forced into confrontation and opposition, rather than feeling that their views have been listened to, let alone taken into account. We are also surprised to see that the draft Local Plan has effectively been published, ahead of its consideration by Scrutiny and Cabinet.

In that context, we make the following requests of Cabinet:

1. **The [Regulation 18 \(2\) Consultation Response Report](#) is not considered fit for purpose and should be re-written prior to the Local Plan consultation.**
  - Should a total of approx. 100 responses be considered sufficient to establish that the consultation has been adequately conducted?
  - Why is there no indication of where the responses have come from? Are these from individuals or groups representing 100s or 1000s of Oxford residents?
  - Why is there no weighting indicated as to the level of agreement on comments? We are simply given an edited list of comments, but no indication of how many people agree to each of these.
  - Most importantly, why is there no indication of how the City Council will respond to these comments? We wonder if the Council can point to one single change to the Local Plan that it has made in response?

As an alternative approach, the Committee might like to consider this [consultation report](#) produced recently by South & Vale District Councils, alongside an [interactive issues consultation website](#). Admittedly this is at an earlier Local Plan stage, but it does set out clearly how the Councils intend to respond to comments.

2. **A further paper on the Housing & Economic Needs Assessment (HENA) should be published alongside the Local Plan consultation giving specific responses to the detailed criticisms that have been made of this document by a wide range of statutory and non-statutory stakeholders.**

We agree that Oxford needs considerable investment in genuinely affordable housing. Nonetheless, decisions must be made on good evidence, to avoid the unnecessary loss of green space and countryside including Green Belt, and the HENA is clearly flawed. Critical questions remain unanswered, for example:

1. Why the trajectory proposed for Oxfordshire as a whole envisages the population growing by nearly 27% by 2040, compared to Office for National Statistics estimates of a UK population increase of less than 5%?
2. Why the level of growth proposed is over 50% more than the growth experienced in the previous period?
3. Why household growth is assumed to continue at the same rate from 2019-2029 to 2029-39 when the Office for National Statistics predicts a 41% fall in the second decade?
4. Why net migration is based on a 5 year rather than 10 year average, adding 20% to the figures?

Unfortunately we are not able to attend tonight's meeting in person to read this statement. However, we ask Cabinet to give careful consideration to these matters, which are crucial to delivering a thriving Oxford, in the context of both the City and the County as a whole.

**Response from Councillor Louise Upton, Cabinet Member for Planning and Healthier Communities:**

The regulation 18 consultation took place in two parts, with a second, focused consultation taking place on housing need only. There are two consultation reports corresponding to each of these consultations. The part 1 consultation had a series of preferred options covering nearly all issues to be covered by the local plan, except for housing need. This consultation report is extensive and gives a short commentary on how comments are being considered. Not all respondents are listed. Many are anonymous. However, when the respondent is particularly relevant to the point made, this is noted. The second Regulation 18 consultation was on a single issue. It is noted in the corresponding consultation report who made the comment when they are a statutory body. The numbers referred are in Appendix 1, which shows the number of responses received through the consultation portal. Many additional comments were received, mainly by email. Overall, including the early Issues consultation, around 3,000 responses have been received to our Local Plan 2040 consultations.

When responses are in the form of a questionnaire then statistics or graphs are produced in the consultation report, and this is the case for the main Regulation consultation report, but it did not apply to the second Regulation 18 consultation. The number of people who made a particular point is not of relevance- it is the significance of points made that matters, and they are all given consideration no matter whether they were raised by one or many people.

The responses in the second Regulation 18 consultation relating to housing need and the HENA were considered carefully. However, it was not considered that any of the comments raised issues that suggest that the HENA does not include an appropriate approach to calculating housing need. We still consider that the methodology is sound. Alongside the publication of the submission draft Oxford Local Plan 2040 for consultation will be a wide range of supporting materials, including a background paper that explains in more detail what we consider our

exceptional circumstances for using an alternative method of calculating housing need, other than the Standard Method, with a brief summary of the methodology of the HENA and detailing the rationale or some of the assumptions in the HENA.

Address by Kaddy Beck of the Save Bertie Park Campaign:

We understand that when you send the Local Plan to the Secretary of State they will assess whether it is effective (i.e. deliverable over the plan period) and consistent with national policy (i.e. in accordance with policies in the National Framework).

The 2036 plan policy SP32 for the development of Bertie Park states that planning permission for housing will only be granted if our recreation ground, including its Multi Use Games Area, is re-provided on the land behind Wytham Street. You have never suggested complying with this requirement. Your proposals were advertised as a departure from the Local Plan. It is clear that you do not consider plan policy SP32 to be deliverable over any plan period. So the 2040 Local Plan states that Bertie Park should be allocated for residential development (or a primary school), but you have scrapped the requirement to re-provide the recreation ground.

Although this makes the policy, in principle, deliverable, it is no longer in accordance with policies 8, 98, 99 and 130 of the National Policy Planning Framework.

The only way that the new Bertie Park policy could pass inspection would be if your proposal to appropriate the land on Bertie Park for planning purposes is successful. (You also state that appropriation is for the regeneration of the park but this is just silly). Although you have *started* the process of appropriation, it is difficult to see how you can comply with the conditions set out in section 122 of the 1972 Local Government Act. As a local authority you have a duty to act within the law. Any decision to proceed with appropriation will trigger judicial review, which is unlikely to be completed before the 2040 Local Plan is submitted to the Secretary of State.

The continued inclusion of the Bertie Park on the Local Plan is particularly ironic given that you have said that the new Local Plan 2040 aims to "protect existing leisure, community and cultural facilities" whether or not they are in district centres.

We are therefore highlighting the need to remove Bertie Park from the list of development sites for the 2040 Local Plan.

Are you really determined that we, as a community, do not either need or deserve to keep this recreation ground?

**Relevant National Policies/Laws**

**NPPF 8:** "social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations (and) by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being."

**NPPF 98:** "Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities"

**NPPF 99:** "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use”

**NPPF 130:** Planning policies and decisions should ensure that developments:

f) create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

**1972 Local Government Act**

**122 Appropriation of land by principal councils.**

- (1) Subject to the following provisions of this section, a principal council may appropriate for any purpose for which the council are authorised by this or any other enactment to acquire land by agreement any land which belongs to the council and is no longer required for the purpose for which it is held immediately before the appropriation; but the appropriation of land by a council by virtue of this subsection shall be subject to the rights of other persons in, over or in respect of the land concerned.
- (2) A principal council may not appropriate under subsection (1) above any land which they may be authorised to appropriate under **[F1 section 229 of the Town and Country Planning Act 1990]** (land forming part of a common, etc.) unless—
  - (a) the total of the land appropriated in any particular common, . . . **F2** or fuel or field garden allotment (giving those expressions the same meanings as in **[F3 the said section 229]**) does not in the aggregate exceed 250 square yards, and
  - (b) before appropriating the land they cause notice of their intention to do so, specifying the land in question, to be advertised in two consecutive weeks in a newspaper circulating in the area in which the land is situated, and consider any objections to the proposed appropriation which may be made to them,

**F4** .....

**[F5(2A)]** A principal council may not appropriate under subsection (1) above any land consisting or forming part of an open space unless before appropriating the land they cause notice of their intention to do so, specifying the land in question, to be advertised in two consecutive weeks in a newspaper circulating in the area in which the land is situated, and consider any objections to the proposed appropriation which may be made to them.

- (2B) Where land appropriated by virtue of subsection (2A) above is held—
  - (a) for the purposes of section 164 of the Public Health Act 1875 (pleasure grounds); or
  - (b) in accordance with section 10 of the Open Spaces Act 1906 (duty of local authority to maintain open spaces and burial grounds),

the land shall by virtue of the appropriation be freed from any trust arising solely by virtue of its being land held in trust for enjoyment by the public in accordance with the said section 164 or, as the case may be, the said section 10.]

**F6(3)** .....

- (4) Where land has been acquired under this Act or any other enactment or any statutory order incorporating the Lands Clauses Acts and is subsequently appropriated under this section, any work executed on the land after the appropriation has been effected shall be treated for the purposes of section 68 of the **M1**Lands Clauses Consolidation Act 1845 and section 10 of the **M2**Compulsory Purchase Act 1965 as having been authorised by the enactment or statutory order under which the land was acquired.

**Response from Councillor Louise Upton, Cabinet Member for Planning and Healthier Communities:**

The red line of the Bertie Place allocation in the new draft Local Plan has been amended so that it no longer includes the larger part to the west. This area was originally included in the allocation as a possible site for a primary school, as that would have been the playing field. In the LP2040 the smaller site is allocated for residential use. As the western part of the site is not to be used for built development, or needed to enable a primary school, it is no longer included in the allocation. Therefore, the new draft policy is not specific about using this part of the (previous, LP2036) allocation as the site of replacement facilities.

However, I have to stress that there is no change to the general principle of replacement. The draft policy still requires 'adequate re-provision of current recreation facilities to meet the needs of those who currently use the facilities (and for new residents too). The site allocation policy also refers to Policy G1, which sets out the requirements for green space, which are in line with the NPPF, such that the facilities need sufficient re-provision to the same standard or higher. This site is allocated because it is considered there is potential for adequate re-provision to meet needs, and at the moment there is no reason to assume that won't be on the site to the west. The allocation is therefore not considered contrary to the NPPF paragraph 8 or 98-99 or 130.