### **Oxford Station SPD**

## Appendix 1

Public Participation Statement
Regulation 12 (a) Town and Country Planning (Local Planning) (England)
Regulations 2012



# September 2017

### 1 Introduction

- 1.1 This Public Participation Statement sets out how Oxford City Council has engaged and consulted with stakeholders on the Oxford Station Supplementary Planning Document (SPD) in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>1</sup>, and the adopted Statement of Community Involvement (SCI).
- 1.2 An Interim Public Participation Statement (early stage consultation) was published, setting out how the City Council has engaged and consulted with stakeholders and the public.
- 1.2 This statement provides details of the early stage consultation. It includes the informal engagement and consultation activities and the resulting feedback relating to the pre-production stage of the SPD. Following the period of statutory public consultation (30<sup>th</sup> June-25<sup>rd</sup> August) this statement has been updated to include details of the responses received from the public and the stakeholders together with the proposed changes to the SPD.

### 2. Background

- 2.1 An architectural competition was undertaken in 2015, the outputs from this competition together with the feedback from the Oxford Design Review Panel masterplan workshop has helped to inform the content of this document. The knowledge and scoping work undertaken has been very helpful in providing an evidence base to inform the SPD.
- 2.2 The Oxford Station Masterplan was prepared by the tripartite partnership of Oxford City Council, Oxfordshire County Council and Network Rail in conjunction with the Train Operating Companies and the Department of Transport.
- 2.2 The mission of the masterplan was 'to develop a rail hub and interchange for Oxford, reflecting its status as a world class city and a global centre for innovation and learning, and responding to its internationally recognised heritage assets.'
- 2.2 The Oxford Station Masterplan sets out the overarching context for this SPD, highlighting the strategic rail improvements and upgrades that highlighted the need for a major overhaul of Oxford's Station and its immediate surroundings. A significant amount of exploratory work has therefore been undertaken to explore the impacts and improvements that should accompany this transformation.

<sup>&</sup>lt;sup>1</sup> With effect from 6th April 2012, the Town and Country Planning (Local Development) (England) Regulations 2004 (Statutory Instrument 2004 No. 2204) were replaced by the Town and Country Planning (Local Planning) (England) Regulations 2012 (Statutory Instrument 2012 No. 767). Therefore 2004 Regulation 18 was replaced by 2012 Regulations 12(b) and 13.

2.3 The Oxford Station Masterplan has then been reviewed to identify previously agreed objectives and technical design requirements. The preparation of this SPD has therefore built upon rather than reinvented the previous work undertaken as part of the masterplan process.

#### 3 Purpose of the SPD

- 3.1 A Supplementary Planning Document (SPD) gives detail to existing adopted policies. There are many adopted policies that are likely to be relevant to the development of this site, in particular in the Core Strategy and the West End Area Action Plan. The SPD will be a material consideration in the determination of any planning application made on the site. Once the landowner is ready, detailed plans for the site can be drawn up based on the guidance in this SPD and provide the framework for a planning application to be made. The advice and guidance will show how the site can be developed and provide certainty for both the developer and the public to inform a future planning application.
- 3.2 The Oxford Station Supplementary Planning Document (SPD) is a significant opportunity to bring together development proposals for the Station area with an overarching vision for the creation of a truly integrated transport hub, which will serve as a distinctive gateway to Oxford.
- 3.3 The SPD will create a comprehensive and coherent framework which maximises the development potential of the station site and generates a positive dynamic for the surrounding sites with development opportunities.
- 3.4 The Oxford Station SPD will help to deliver the following objectives and priorities:
  - promote an outward looking development that creates synergies with neighbouring development sites;
  - acts as an effective gateway into Oxford;
  - is safe and convenient for pedestrians and cyclists;
  - promotes an excellent / maximised connectivity network with the Station at its core;
  - maximises development potential of the Station area;
  - responds imaginatively and sensitively to Oxford's heritage context;
  - incorporates progressive and sound urban design principles and guidance;
  - addresses the three-dimensional design issues in its massing strategy;
  - addresses opportunities to maximise value as well as development quantum;
  - helps to ensure that the vision for high quality public realm and integrated transport hub and associated development are accompanied with appropriate flexibility in design and implementation
- 3.5 The City Council has an adopted Core Strategy (September 2011) and an adopted West End Area Action Plan (2008) that were subject to a rigorous consultation process and public examination and currently form the Local Development Framework. A review is however underway and is at the early stages (Preferred Options) of the preparation of the Local Plan 2036.
- 3.6 The West End AAP was prepared and is being actively used to 'guide future development and change in the West End' area of the city. The AAP was considered to be 'both a policy and a delivery tool'. It identified both the Oxford Railway Station and the Becket Street car park as future development sites and recognised the importance of strategic infrastructure to enable the West End and its wider environment to function efficiently 'particularly transport and utilities.'
- 3.7 The Oxford Station SPD is intended to build on the policy context set out within these documents particularly the West End AAP, which identifies these sites for future development and sets out key design principles for the renaissance of the West End. The SPD supports the delivery of

development to meet planning policy objectives, helping to address Oxford's social, economic and environmental needs, in particular the City's growing economy, housing shortage and its transport capacity. This supplementary guidance provides a more detailed framework together with some design principles to help to deliver this development.

### 4 Early stage consultation

- 4.1 There has been early stage informal consultation on the Oxford Station Masterplan, which comprised stakeholder consultation during April to September 2013. A presentation was given by the appointed consultants (AHR) and Network Rail to City and County Council Members setting out the background, analysis, constraints and potential options. The developed options were discussed and general support given. Detailed issues such as drop off, parking and cycle linkages were discussed and improvements suggested.
- 4.2 The Oxford Station Project Board met in November 2013. Three developed options were presented to the board and discussed. The preferred option was then approved. A major Stakeholders Forum on the future of Oxford's rail services and station was held at the Said Business School. This was aimed primarily at key landowners in the area and Rail Operators. A presentation was given by AHR and DfT on the background to the project, analysis, constraints and potential and preferred options. Stakeholders were in general very supportive of the proposals. Detailed comments included alternative solutions for comprehensively building above the rail tracks to provide additional housing. It was subsequently agreed to undertake more detailed work on this option.
- 4.3 In July 2014 the Station Masterplan was launched and in August 2014 the Station Masterplan exhibition was held in the Westgate Shopping Centre. Then in Autumn 2015 an architectural competition was launched which invited international firms to develop concept designs for a new station, bridge and transport interchange. The submitted proposals formed part of a public exhibition where the public were invited to choose their preferred design / concept. Over 500 responses to the competition were received from the public and key stakeholders.
- 4.4 Oxfordshire County Council has been informally consulted on the draft document and there have been discussions and meetings with a range of officers, including those within the infrastructure and transport teams. In addition there has been early stage informal consultation with a range of officers from within the City Council particularly Property Team; City Development and Housing. Members Briefings sessions were also held for City Council and County Council councillors.
- 4.5 The City Council has continued to work with its primary partners, Network Rail and Oxfordshire County Council in developing the SPD and has carried out early stage engagement with a wide range of stakeholders through the Oxford Station Working Group and the West End Steering Group whose comments to date are reflected in the draft document.
- 4.6 A statement setting out the scope of the Public Consultation on the Draft Oxford Station SPD was submitted to and approved by the Public Involvement Project Board at their meeting on May 25<sup>th</sup> 2017
- 4.7 A report on the Oxford Station SPD was taken to a meeting of the City Executive Board (CEB) on 20<sup>th</sup> June 2017. Members agreed its content and its suitability for going out for Public Consultation.

### 5 Strategic Environmental Assessment Screening Consultation

5.1 A Combined Strategic Environmental Assessment Screening and Scoping Report has been produced to determine the need for a Strategic Environmental Assessment (SEA) in accordance

- with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004 for the Draft Oxford Station Master Plan SPD.
- 5.2 As this report also includes the Scoping Report, the City Council consulted with the three statutory environmental bodies (English Heritage, the Environment Agency and Natural England) for 5 weeks in order to determine the level of detail of the information that must be included in the SEA Report. As well as meeting the requirements of the Regulations, this SEA Combined Screening and Scoping Report is available alongside the draft SPD.
- 5.3 The SEA Combined Screening and Scoping report identified that the Oxford Station SPD is likely to add an additional level of detail to that of the West End AAP. However any such assessment should be proportional to the level of the plan that is being assessed. Any assessment undertaken under the SEA Regulations<sup>12</sup> does not rule out the need for further assessment, should it be necessary, under the EIA Regulations.
- 5.4 So in summary whilst a Sustainability Appraisal is no longer required for SPD's under UK law, there is still a requirement to look at whether a Strategic Environmental Assessment could be needed for and SPD. As such, to comply with European regulations, a Strategic Environmental Assessment (SEA) Combined Screening and Scoping Report, was produced to identify whether the SPD would be likely to have any significant environmental impacts and whether or not an SEA is needed for the SPD. This exercise found that further work on flooding and transport should be undertaken, (this additional work has now been completed), but that no SEA was required because a Sustainability Appraisal was conducted on the SPD's parent document the West End Area Action Plan (WEAAP) because the SPD simply supplemented the policies in the AAP rather than adding to them no SEA was required.
- 5.5 The statutory consultees for the SEA (Environment Agency, Historic England and Natural England) were consulted again on the Combined Screening and Scoping Report and no objections were raised.

## 6 Consultation on the Draft SPD

- 6.1 Formal public participation on the SPD took place for an eight-week period from 30<sup>th</sup> June to 25<sup>th</sup> August 2017. The consultation involved the information being made available on the City Council's website and for viewing at St Aldate's Customer Service Centre and at the libraries within the city; use of the City Council's online consultation software; an invitation to comment was sent to the statutory consultee bodies, and those organisations, residents groups, amenity bodies and individuals (approximately 600) who have registered an interest in planning policy documents together with a press release.
- An exhibition together with copies of the SPD and SEA Screening Report was made available to view at the City Council's Offices in St. Aldates Chambers during the public consultation period. The exhibition was staged at the venues below during the following dates and times:
  - Oxford Station concourse: between Wednesday 12<sup>th</sup> July to Friday 14<sup>th</sup> July; on Friday 14<sup>th</sup> July officers and the consultants were available to discuss the proposals with the public and key stakeholders (9.00am 12.00pm and 3.00pm 6.00pm); and
  - Oxford Station concourse: between Wednesday 26<sup>th</sup> July to Friday 28<sup>th</sup> July; on Saturday 29th July officers and the consultants were available to discuss the proposals with the public and key stakeholders (9.00am 12.00pm and 3.00pm 6.00pm); and
  - Oxford Station concourse: between Wednesday 9<sup>th</sup> August to Friday 11<sup>th</sup> August; on Saturday 12<sup>th</sup> August officers and the consultants were available to discuss the proposals with the public and key stakeholders (9.00am – 12.00pm and 3.00pm – 6.00pm); and

- Town Hall: a 'drop-in' session was held for the public and key stakeholders to discuss the proposals with officers and consultants.
- 6.2 The Oxford Station SPD together with the Strategic Environmental Assessment (SEA) which includes the Combined Screening and Scoping Report was made available alongside the SPD during the consultation period. Furthermore a summary leaflet (with a link to the online questionnaire) explaining the vision and key design principles together with 'hard copies' of the questionnaire was prepared and made available for the public and stakeholders at the exhibition. Approximately 1000 summary leaflets were printed and either handed out or made available to the public and stakeholders during the course of the exhibitions. The summary leaflet provided a direct web link to the City Council's Consultation pages. This provided an opportunity to both view the SPD and SEA online and complete the questionnaire. The SPD and SEA screening report could also be viewed via the Planning Policy pages of the City Council's website.
- 6.3 Following the eight-week period of statutory public consultation, responses received were processed and analysed. This final Public Participation Statement sets out a summary of the main issues raised through the consultation and how those issues have been addressed in the final SPD. This Public Participation Statement will be reported to City Executive Board when the final SPD is presented for adoption.
- 6.4 The Statutory consultees were formally consulted about the Oxford Station SPD. No objections were received although comments were made by both the Environment Agency and Natural England. The Environment Agency were pleased to see that flooding had been identified as a key constraint and that it should be drawn to the attention of the landowner and developer at the early design stage. Natural England welcomed the opportunity to comment but felt the nature of the proposal as an SPD, based on the SEA scoping report, would not require any further direct involvement.
- 5.4 There were 99 responses to the questionnaire 55% of the respondents either agreed or agreed strongly with the vision and objectives set out in the Oxford Station SPD. Of the eight design principles set out in the SPD the strongest support was for the need to improve pedestrian and cycle links at the Station area and integrate better with the transport network with 62% of respondents who either agreed or agreed strongly. Positive support was received for the creation of new public spaces and the need to create a greater sense of arrival to the City with 59% who either agreed or agreed strongly. There was also recognition that the design principle of urban form, views and buildings is important in ensuring that this redevelopment with a good standard of urban design can significantly improve both the character and appearance of the City centre. In addition there was a majority of people who supported the related principles around 'access and movement' and 'bus movement and interchange' namely 52% and 51% respectively who either agreed or agreed strongly that comprehensive redevelopment of the site should deliver a new multi-modal transport interchange.
- 6.5 Whilst support was given for both the 'land use mix' and 'scale and massing', this was slightly less at 47% and 45% of people who either agreed or agreed strongly with the content of these design principles.
- The design principle for car and taxi movement was however not supported by respondents the majority (51%) of whom disagreed with the proposals. This largely reflected the concern expressed by the Abbey Road and Cripley Road residents about the creation of new short-term parking, staff parking and a drop-off and pick-up point being proposed to the west of the Station.

- 6.7 In relation to the question about the design approach taken for the key development components or parts of the Station Area, strong support (79%) was received for the approach taken for the Station and Station Square East. A majority of people (53%) supported the proposals for the Corner site and Bus Interchange and multi-storey car park. The lowest amount of support (43%) was for the design treatment of the Western Station entrance, which again reflects residents' concerns.
- Further comments on the Illustrative masterplan and other comments generally. The responses were varied and covered a wide range of comments, many of which raised key issues already identified below. There was a desire to see the new Station designed to a high standard with good quality materials. Cycle parking and facilities should be available at both of the key entrances. There was recognition that the development should respect its setting and not adversely impact on local communities. Retail uses should be focused principally on the needs of commuters. The needs of cyclists in terms of cycle parking, facilities and movement represented a high priority. Access for both cyclists and pedestrians under the Botley Road Bridge was considered to be important and should be segregated. Generally there was a desire to reduce both the number and impact of private parking in favour of more environmentally sustainable travel modes, such as public transport, cycling and walking. Concern was expressed about the impact of the proposed development on local residents, particularly those in Abbey Road and Cripley Road. Respondents also wished to be assured that the new Station would provide good facilities for passengers with disabilities.
- 6.9 In addition there were 46 individual letters and emails from a range of key stakeholders, organisations, residents groups, amenity bodies, and landowners who raised a range of different issues. The main concerns expressed by particular interested parties were as follows:

**Funding and viability:** Lack of funding and need to maximise land values to make redevelopment viable (Network Rail)

Officer response and proposed changes: The station is a top priority for the city in the Strategic Economic Plan. Both the station and the bridge are identified as key infrastructure funding priorities currently being pursued as part of the Oxfordshire Infrastructure Fund. The City Council have been successful in bidding for some Local growth Fund. The SPD will be amended to: reflect the progress already made for funding and the potential for future sources; confirm that all of the proposed uses are considered to be viable, through a phased development of the site; and that the City Council will continue to work with the County Council and partners to ensure a funded deliverable scheme.

In terms of viability and the need to maximise the value of the site, amendments will be made to the SPD to allow for greater flexibility to respond to any potential currently unforeseen opportunities, subject to compliance with the general design principles.

6.10 **Design principles too prescriptive:** SPD should not prescribe design solutions or use of space, but be driven by operational and servicing requirements of the station and the specific technical requirements of the Rail industry (Network Rail, County council)

Officer response and proposed changes: The role of the SPD is to provide advice and guidance to show how the Station site can be redeveloped to provide a new Station together with the supporting commercial uses which will help significantly towards the funding and viability of the scheme. The delivery of a new Station for Oxford remains a top priority. Innovative solutions and the need for flexibility will be explored with partners to ensure the operational requirements for the Station are fully taken into account to ensure a viable and sustainable development is achieved within the context of the general design principles.

6.11 **Impact on residential amenity:** No consideration of residential character and the potential adverse impact of proposed development. Concern particularly about scale and massing of buildings; overshadowing; loss of trees; traffic generation; noise and disturbance from short-term parking, staff parking and drop-off and pick-up points; and noise from both train operation and construction (Abbey and Cripley Road Residents, Christchurch, Rewley Park Management Company, Liberal Democrat Group and local residents)

Officer response and proposed changes: a new section has been included in SPD on the character of the 'residential areas' near the Station, including the west of the Station, Rewley Park and around St. Thomas' church. The design principles will include reference to the need to assess the relationship and potential impact of new development on residential areas. The short-stay parking spaces will be relocated to Becket Street area and the potential for redesigning the scale and mass of the operational building. Staff parking will be limited to operational spaces only. The trees along Cripley Road will be subject to a Tree Preservation Order (TPO). The sustainability section and design principles will include reference to the importance of providing 'green infrastructure'. The access and movement section will include the need for a redesign of Roger Dudman Way and Cripley Road together with the access points and the importance of maintaining vehicular and cycle access to existing areas.

6.12 Cycle and pedestrian routes, access, movement and parking: cycle routes need to be segregated, well-signed, well-lit and useable for all ages and abilities. Development needs to provide convenient access and avoid conflict at junctions and routes to Station. Cycle path under Botley Bridge needs to be segregated and provided on both sides. Potential conflict with buses and coaches at Becket Street. Access for cyclists needed from both east and west. More cycle parking including provision to the West and innovative solutions sought. Station frontage should prioritise cyclists and pedstrians (Cyclox, residents, Cllr. Pressell, Liberal Democrat Group and County Council)

Officer response and proposed changes: convenient and safe access and movement within the Station area for both pedestrian and cyclists is a top priority and will be emphasised in the design principle. The option of providing some further cycle spaces to the west side of the Station will also be included. The cycle routes to and from the Station will be reviewed and added to where necessary together with additional text on cycle proposals set out in the Oxford Transport Strategy and LTP4. Further detailed work will need to be undertaken at the detailed design stage to ensure that cycle provision is made under Botley Bridge in line with the County Council's requirements for its designation as a Cycle Super Route; and access and signage arrangements are provided. Cycle parking of 2,450 covered cycle stands represents only the minimum parking requirement opportunities for additional space will be encouraged. Innovative cycle parking facilities will be promoted through the design principles.

6.13 **Bus interchange and access:** proposed location for bus interchange does not promote modal interchange objective; or achieve 'integrated transport hub' should be at Oxpens; walking routes for pedestrians to and from Station poor and potential conflict between vehicles and pedestrians; legible routes required; not clear whether bus interchange serves local buses and coaches from Gloucester Green; priority should be local; buses would be re-routed adding time to journeys for passengers and traffic congestion; 'herringbone' bus bays would not work; 'island' maybe preferable; increase in bus use will add to traffic congestion; bus interchange should be under cover (Oxford Bus Company, Rail Future, Christchurch, Oxford Civic Society, North Hinksey Neighbourhood Plan)

Officer response and proposed changes: The bus interchange is an important component of the creation of a 'transport interchange' the importance of ensuring the interchange between modes is recognised. Further supporting text will be added to strengthen this key role. Additions will be made to the text and relevant plans to provide further information on proposed pedestrian and

cycle routes and how they relate to the Station site area. The proposed access arrangements and possible design solutions will be explored further as the scheme is developed in more detail.

The illustrative master plan section will include a new option on reduced car parking, which potentially offers other opportunities to maximise sustainable travel, promote cycling, walking and public transport and reduce zero-emissions; together with alternative options to realise the value of the site to make the redevelopment more commercially viable. The City Council will continue to work with the bus and coach operators and the County Council as highway authority to ensure the appropriate design solution for the bus interchange is achieved and that access arrangements to and from the site are as efficient as possible to avoid any undue delay in journey times. The bus movement and interchange section of the design principles does already show an alternative layout with 'islands'.

- 6.14 Reduce car dependency and parking: transport hub interchange does not show a corresponding reduction in parking potentially; high levels of private car movements to West side of Station short-term, staff and drop off provision; proposals contrary to LTP4 concerned with demand management and air quality; suggest reduced parking option. (Christchurch, University of Oxford) Officer response and proposed changes: The proposal for car parking provision is largely to replace the amount of existing parking spaces but not to allow a net increase in spaces. The parking arrangement comprising the proposed new multi-storey car park would make better and more efficient use of the site. The bus interchange and improved cycle and pedestrian links to the Station does seek to positively promote sustainable travel. Short-stay parking on west-side of Station to be relocated to Becket Street area and reduction will be sought to staff operational parking.
- Oxford's identity and local distinctiveness: SPD needs to be seen in 'city-wide' context promoting Oxford's identity and local distinctiveness; 'heritage context' and 'urban form' require more detail; views, scale and massing needs to take greater account of 'local' and 'longer' views (Oxford Preservation Trust, residents)
  - Officer response and proposed changes: the 'heritage context' will be reviewed in the light of the detailed comments received, particularly in relation to the Swing Bridge and St. Thomas's Church. The scale and massing section will be revised to include further details on the need to consider the 'local' and 'longer' views and the Oxford View Cones Assessment. The Illustrative master plan provides the opportunity to show that different options for elements of the development can be explored offering different design solutions. The SPD seeks to provide some necessary flexibility for innovative designs which comply with the design principles.
- 6.16 Roger Dudman Way / Cripley Road: concerns about future vehicular access arrangements for developments off Roger Dudman Way, need for both vehicular and cycle routes to be properly secured; proposed arrangement will be difficult to achieve with differences in ground level; junction arrangements with Botley Road need to be properly designed (ACRA, University of Oxford Christchurch and local residents)
  - Officer response and proposed changes: The access and movement section will be amended to include a redesign of Roger Dudman Way and Cripley Road together with access points and the need to maintain access for both vehicles and cyclists who already use these routes. The City Council will discuss with the County Council as highway authority the need to consider appropriate traffic management measures at the junction with Roger Dudman Way and Botley Road.
- 6.17 **Botley Road Bridge:** present width does constrain traffic movements should reduce amount of traffic and create more capacity; poor arrangement for both cyclists and pedestrians effects safety

needs segregated cycle and pedestrian routes; bridge needs to be widened (Cyclox, Cllr. Pressell, North Hinksey Neighbourhood Plan)

Officer response and proposed changes: a further assessment will need to be undertaken at the detailed design stage to show what level changes in the Botley Road may be required together with any traffic management measures. The needs of pedestrians and cyclists will be taken into account to ensure they fully satisfy the County Council's requirements for the designation as a 'Cycle Super Route'.

6.18 **Public realm:** public realm would be affected by additional buses; the active landscaping of the public realm will be vital to its success; need to resolve any potential conflicts with cyclists and pedestrians; and need to respond to City centre movement and public realm strategy (Oxford Civic Society, County Council, Cyclox and residents)

Officer response and proposed changes: The creation of a high quality public realm within the Station Square East is a key component of the SPD, which will focus principally on promoting pedestrian and cycle priority. The detailed design of this space will be set out in a comprehensive Design and Access Statement as part of any planning application. The City centre movement and public realm strategy has just been commissioned to provide part of the evidence base to inform the Local Plan, any key findings that emerge from this study will be taken into account alongside the key design principles of this SPD as the redevelopment of the Station site is taken forward.

6.19 **Sustainability and renewable energy:** 'green infrastructure' should be included as a design principle, buses play an important role in promoting sustainable travel, need to address issue of 'urban heat islands' utilising green / brown roofs for biodiversity, mitigation measures to reduce light and pollution should use latest technology, future development should have regard to flooding and sustainable drainage issues, more consideration should be given to renewables and carbon-neutral approach, design should include renewable energy solutions (ACRA, Oxford Bus Company, Liberal Democrat Group and some residents)

Officer response and proposed changes: New development should have regard to flooding and sustainable drainage issues, with consideration given to renewables and carbon-neutral approach. The text will reference the emerging policy approaches on sustainability principles set out in the Preferred Options Document of the Local Plan 2036 together with the City Council's Sustainability Strategy.

### 7.0 Next stages

- 7.1 The City Executive Board (CEB) is asked to consider the public comments received on the Oxford Station SPD and the proposed changes to be made in response, and then to adopt the SPD and authorise the Head of Planning Sustainable Development and Regulatory Services, in consultation with the Assistant Chief Executive for Regeneration and Planning and the Economy to make any editorial corrections necessary prior to publication.
- 7.2 Any person may apply to judicially review the adoption of the SPD upon adoption and must be made promptly and in any event no later than three months from the date of adoption (16<sup>th</sup> October 2017).