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## Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

### Publication Draft - Representation Form

#### PART A: PERSONAL DETAILS

\* If an agent is appointed, please complete only the Title, Name and Organisation in box 1 below but complete the full contact details of the agent in box 2.

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title	Miss	
First Name	[REDACTED]	
Last Name	Pudge	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	Sport England	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Loughborough	
Line 4	[REDACTED]	
Post Code	LE11 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 28 <sup>th</sup> March 2014

**Personal Details & Data Protection Act 1998**

Regulation 22 of the Town & Country Planning (Local Development) (England) Regulations 2012 requires all representations received to be submitted to the Secretary of State. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. From the details above for you and your agent (if applicable) the Council will only publish your title, last name, organisation (if relevant) and town name or post code district. Please note that the Council cannot accept any anonymous comments.

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**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**

**3. To which part of the Plan does this representation relate?**

Section	5.4	Paragraph		Policy	EN1
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	X
4 (3). Complies with the Duty to co-operate	Yes		No	

**5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.**

**If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

EN1 part C – On site provision of pitches within housing sites are often not viable and unsustainable because of the maintenance and management arrangements associated with ensuring the pitch remains good quality and accessible. Single pitch sites with no ancillary facilities e.g. changing rooms are not desirable to pitch users so do meet a need for matchplay. However, single pitches can meet an informal recreational need but this informal need is very difficult to identify in needs assessments. Provision must be related to the site specific action plan within the emerging Playing Pitch Strategy (PPS). This will show which existing sites in each sub area require improvements to create the capacity to accommodate the additional demand from local housing developments. The PPS will also identify sites or areas of search for new playing field provision to support housing growth. The proposals map cannot be updated until the PPS has been finalised.

Sport England is involved in the preparation of the Council’s emerging Playing Pitch Strategy. An Assessment Report has been prepared and the Strategy Report is underway at the time of writing. However, the findings of the Assessment have not been used to help inform the relevant policies and open space standards contained within this plan.

Sport England is a statutory consultee on all planning applications that affect playing fields and in addition are often consulted in an advisory capacity on planning applications that affect or create new sports provision. Sport England Playing Fields Policy and the criteria contained within paragraph 74 of NPPF are used to assess these applications. The first criterion of both Sport England policy and paragraph 74 of NPPF relate to the loss of playing field/sports facilities that are clearly shown to be surplus requirements. An up to date and robust Needs Assessment in accordance with paragraph 73 of NPPF is used to identify whether the playing field/sports facility is surplus to requirement or should be replaced. Paragraph 73 clearly states planning policies should be based on robust and up to date assessments of needs and opportunities. It is Sport England’s opinion that policies based on out of date data could:

- undermine Sport England’s statutory remit; and
- lead to inappropriate provision of sports facilities based on out of date standards

Sport England consider inappropriate and out of date evidence has been used to justify sport and recreation related policies (EN1) and the open space standards set out in the appendix 9. It is considered the lack of up to

date and robust evidence of needs and opportunities is contrary to paragraph 73 of NPPF.

EN1 Part F - open space standards for outdoor sport are not appropriate to determine needs for the following reasons:

- The standards are based on demand and supply data from 2005. This data is out of date and does not reflect changes that have occurred since that time.
- Quantity Standard - Demand for pitches change from season to season as does the supply. Provision should be linked to the site specific action plan that is being developed through the emerging Council Playing Pitch Strategy (PPS). The quantity standard will be out of date on an annual basis as changes in pitch provision and demand change with the seasons. The PPS will incorporate scenario's to assess the impact of housing growth on pitch sport provision in each of the sub areas. This will result in a site specific action plan which will identify sites that require improvements to create capacity to cater for the additional demand from housing, areas of search for new playing field to be incorporated into the Sites Allocations DPD, and list those sites that are surplus to requirement. A formula can be developed to link the appropriate level of developer contribution to individual housing sites. Thus ensuring the correct provision is secured in each sub area to meet identified needs.
- Quality Standard specified in Appendix 9 is not appropriate and the reference to Sport England toolkit is outdated and should be removed. To replace the Sport England quality standard the pitch sport national governing bodies (NGB's) have produced their own quality standards which will be embodied in the council's PPS. The quality standards can be found within the sport specific appendices the Playing Pitch Strategy Guidance 'An approach to developing and delivering a playing pitch strategy' (Sport England October 2013).
- The Accessibility standard is also inappropriate. Accessibility to pitches is more than just having access at the relevant time. Pitches have to be in the right location and of the right type and size to meet needs. Any accessibility standard must incorporate all of these factors.

Main mechanisms - reference to Sport England toolkit should be removed as this no longer operational and has been withdrawn. It formed part of the now superseded 'Towards a Level Playing Field Playing Pitch Strategy guidance. The Council is undertaking a new PPS using the new methodology and toolkits adopted October 2013.

**6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).**

**You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

EN1 part C – add a new bullet point to ensure the pitch provision is linked to the Playing Pitch Strategy Action Plan to avoid unsustainable single pitch sites.

Suggested wording: "A contribution to the provision of off-site playing field improvements or new sites as identified in any up to date Playing Pitch Strategy Action Plan."

This will provide a clear link between the housing site and the playing field site required to accommodate the additional demand arising from the housing development.

EN1 part F – add a second part to separate out the pitch sport requirements. As identified earlier quantity, quality and accessibility standards are inappropriate for pitch provision. Provision should be based on the Playing Pitch Strategy Site Specific Action Plan.

Suggested wording: "Pitch sport provision will be developed through the Playing Pitch Strategy and identified in the Local Plan."

Main Mechanisms – remove reference to Sport England Toolkit and replace with Playing Pitch Strategy

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.*

*After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.*

**7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?**

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination
<input type="checkbox"/>	Yes, I wish to participate at the oral examination

**8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

*Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.*

<b>9. Signature:</b>		<b>Date:</b>	28/3/2014
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## Core Strategy Development Plan Document (DPD) : Publication Draft

### **PART C: EQUALITY AND DIVERSITY MONITORING FORM**

Bradford Council would like to find out the views of groups in the local community. Please help us to do this by filling in the form below. It will be separated from your representation above and will not be used for any purpose other than monitoring.

**Please place an 'X' in the appropriate boxes.**

