



For Office Use only:		
Date		
Ref		

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 th 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.

For Office Use only:			
Date			
Ref			

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

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

Section	Appendices	Paragraph	9	Policy	N/A
---------	------------	-----------	---	--------	-----

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4 (2). Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

In relation to the open space standards set out in Appendix 9 and referred to in policy EN1 there is no currently adopted Playing Pitch Strategy, Outdoor Sport Strategy or Indoor Sports Strategy. The study referred to throughout is the Open Space, Sport and Recreation Study dated 2006. The baseline data has not been updated to reflect current demand and supply of outdoor sports provision so is considered to be out of date and not robust.

Appendix 9 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.

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.

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.

The Council would need to finalise the Playing Pitch Strategy (PPS) and incorporate the findings into Appendix 9. Rather than quantity, quality and accessibility standards the PPS will provide 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.

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.

9. Signature:		Date:	28/3/2014
----------------------	---	--------------	-----------

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.

