

**Part B (see Note 1 and Note 8 para 4.2)**

**Please use a separate Part B form for each representation you wish to make**

Name or Organisation (see Note 8 para 4.1)

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1. To which part of the BDP does this representation relate?

Page: 114	Paragraph:	Policy: BDP 25
Policies Map:	Other document:	

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: <input type="checkbox"/>	No: <input type="checkbox"/>
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3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

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4. Please set out what change(s) you consider necessary to make the BDP legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BDP legally compliant. 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. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

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5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
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Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	<input checked="" type="checkbox"/>
(2) Effective (see Note 5)	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input checked="" type="checkbox"/>
(4) Positively prepared (see Note 7)	<input checked="" type="checkbox"/>

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Sport England welcome the thrust of the policy, which is to deliver high quality, accessible sporting and recreational provision in the right places to meet local demand.

We do have some concerns with the policy however. Firstly, it is vital that the policy is based on, and underpinned by, a proportionate level of evidence (as required by Paragraph 73 – NPPF). The policy references ‘The Open Space, Sport and Recreation Facilities Assessment 2010’ yet the evidence pages on the website direct to the 2007 study. By the time the plan is likely to be adopted, the 2007 evidence will be into its 7<sup>th</sup> year of existence and cannot be considered up to date.

We have been working with the Council to prepare a new Playing Pitch Strategy but this has not yet been completed. This document will form one of the suite of evidence documents to underpin this policy. Also required is a proportionate assessment of built sporting provision.

Without clarity on the evidence to under pin this policy, it is not possible to say the approach is the best to meet the objectively identified needs and therefore there are doubts regarding whether the policy is justified and positively prepared.

On a more specific point, criteria b of policy BDP25.3 sets out that the loss or displacement of indoor or outdoor sport may be permitted where the benefit of the development to the community outweighs the harm caused by the loss of the facility. This is not consistent with the NPPF –par 74 and is unsound.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP 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. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

To address the specific point raised above, the policy criteria should be amended to read

b) where the development is for an alternative sporting or recreation facility and where the benefit to the community outweighs the harm caused by the loss of the current facility.

To address the issue of evidence, the work underpinning the policy should be clarified. We would also suggest that the policy is amended to reflect the evidence base and be more positive in setting out how the policy is to deliver against the identified local need.

An example of a policy which responds to the evidence is Policy CS11 in the draft Lichfield District Local Plan.

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


**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.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? **Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.**

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

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

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Signature: 	Date: 11/11/2013
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