

Proposed Submission Adur Local Plan 2014



Representation Form

Return Address:

planning.policy@adur-worthing.gov.uk


Or:

Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

- Adur Civic Centre, Ham Road, Shoreham-by-Sea, BN43 6PR or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

**Please return to Adur District Council by 5pm on 1st December 2014
Late representations will not be considered.**

 **Use of your information** Respondent details and representations will be forwarded to the Secretary of State for consideration when the Adur Local Plan is submitted for examination. All documents will be held by Adur District Council and representations will be published including on the internet e.g. www.adur-worthing.gov.uk. Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- i. Part A - Respondent Details. You only need to fill this in once.
- ii. Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text" value="Heidi"/>		
Last name	<input type="text" value="Clarke"/>		
Organisation (where applicable)	<input type="text" value="Sport England"/>		
Address line 1	<input type="text" value="Sport Park, 3 Oakwood Drive, Loughborough, Leicester"/>		
Address line 2	<input type="text"/>		
Address line 3	<input type="text"/>		
Post Code	<input type="text" value="LE11 3QF"/>	Telephone	<input type="text" value=""/>
Email address	<input type="text" value=""/>		

Agent's Details (if applicable)

First name	<input type="text"/>		
Last name	<input type="text"/>		
Organisation	<input type="text"/>		
Job Title	<input type="text"/>		
Address line 1	<input type="text"/>		
Address line 2	<input type="text"/>		
Address line 3	<input type="text"/>		
Post Code	<input type="text"/>	Telephone	<input type="text"/>
Email address	<input type="text"/>		

Part B – Representation

Please use separate sheets for each representation

1. Which part of the Adur Local Plan does this representation relate to?

Policy No.	<input type="text" value="5, 6 and 33"/>	Paragraph No.	<input type="text"/>
Map	<input type="text" value="5"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Adur Local Plan to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.
If you have ticked no to 2.2, please continue to Q3.
If you have ticked yes to 2.1 and 2.2 please go to Q7.

3. Do you consider the Adur Local Plan to be unsound because it is not: (tick as appropriate)

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Justified

Adur Local Plan – Part 2

With regard Part 2, Strategic Allocations of the Local Plan, Sport England in wish to comment on **Policy 5 New Monks Farm** (450-600 homes) and **Policy 6: Land at West Sompting** (480 dwellings). The policy for both allocations requires open space and recreation areas and provision for formal sports, in accordance with Council standards.

The Council have provided a standards paper published in March 2014. However the standards paper does not advise what is required in relation to playing pitches or formal built sports facilities as it focuses on parks and gardens, natural and semi-natural green space, amenity green space, provision for children and young people, allotments, cemeteries, civic space and green corridors. Consequently, there is no link from the Local Plan strategic allocation policies to the identified need for playing pitches. Sport England is aware of the playing pitch strategy undertaken by KKP on behalf of the Council. Sport England are not commenting on the robustness of the study but can advise it does not appear to have followed Sport England's methodology. The playing pitches identified as needed in the PPS were not carried across into the standards paper or the Local Plan therefore it is unclear what sports provision is required for each strategic allocation of housing and how the provision can be delivered.

With regards the use of standards, the Playing pitch strategy and open space study can make reference to standards but should only be used as a benchmarking tool and should be caveated as such. Standards should not be used to formulate Local Plan policy. A standards based policy approach was advocated by the old PPG17, however, this is no longer considered a robust policy approach to achieving investment into sport because of paragraph 204 of the NPPF and introduction of the CIL regulations. Sport England consider that if a thorough Playing Pitch Strategy was produced, the action plan should link future provision to strategic housing allocations. The same would apply for built sports facilities. As a result of the above, the policy is not considered robust in compliance with paragraph 73 of the NPPF.

Paragraph 73 of the NPPF states:

Planning policies should be based on robust and upto date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

Currently Sport England do not consider this to be justified as it is not based on proportionate evidence that has then informed the Local Plan Policies.

Consistent with National Policy

Adur Local Plan – Part 4

Sport England would suggest the following changes to **Policy 33: Open Space,**

Recreation and Leisure in order to reflect the criteria set out in Paragraph 74 of the NPPF:

- Sport England would recommend that it change the first criterion to *'An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements'* to ensure that a thorough assessment is undertaken.
- Furthermore Sport England recommends the removal of paragraph three in policy 33 which permits the loss of open space for essential infrastructure. The loss of open space should still go through the criteria set out in Paragraph 74 of the NPPF. If there are no alternative sites available for the essential utilities infrastructure then at least the loss resulting from the essential infrastructure would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. In essence this third paragraph of Policy 33 is superfluous to requirements and it is not considered to accord with Paragraph 74 of the NPPF.
- Policy 33 has omitted the third criterion of Paragraph 74 of the NPPF which states *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss*. Sport England consider this should be included because it permits the loss of playing field only when alternative sports provision is being provided where the needs of which clearly outweigh the loss. The current Policy 33 does not allow for this situation.

Currently Sport England do not consider Policy 33 to be in accordance with Paragraph 74 of the NPPF.

Further comments

Adur Local Plan – Part 3

Shoreham Harbour Regeneration Area: Key 5 Southwick Waterfront and Fishersgate on Map 5 includes a playing field. At this stage Sport England can advise that it would not support the loss of the playing field unless one of the exceptions applied in Sport England's policy 'A Sporting Future for the Playing Fields of England' which is online at www.sportengland.org/planningforsport

The Local Plan advises that an open Space SPD will be produced by the Council to address open space provision in further detail. Sport England would welcome consultation on the production of this document.

5. Please explain in the box below what change(s) you consider necessary to make the Adur Local Plan legally compliant and sound

having regard to the reason you identified above.

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

Provided in Section 4.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give

evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

7. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

8. Please tick if you do not wish to be informed of the following:

When the Plan has been submitted for Examination

When the recommendations from the Examination have been Published

When the Local Plan has been adopted

What happens next?

Representations made to the Council will be passed to the Inspector for consideration.

Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for making representations.