

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2018 - 2039**

Please return to South Staffordshire Council BY 12 noon Friday 23 December 2022

This form has two parts –
 Part A – Personal Details: need only be completed once.
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mr	
First Name	Rajvir	
Last Name	Bahey	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Sport England	
Address Line 1	Sport England	
Line 2	Sport Park,	
Line 3	3 Oakwood Drive	
Line 4	Loughborough	
Post Code	LE11 3QF	
Telephone Number		
E-mail Address (where relevant)	Rajvir.Bahey@sportengland.org	

Part B – Please use a separate sheet for each representation

Name or Organisation: Sport England

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

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

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

Sport England considers that Policy HC18 is not consistent with national planning policy namely NPPF paragraph 99 due to the following reasons:

1. NPPF paragraph 99 relates to the protection of Playing Field Land which can be marked out for a variety of pitch types and sizes. The pitch layout of a site can ultimately change over time to meet demand or capable of meeting future demand identified within a needs assessment for playing pitches.

As currently worded Policy HC18 it could be perceived that it relates to a playing pitch marked out at a point in time and it does not consider the wider playing field site and its ability to accommodate pitches. This could lead to a situation whereby a site which was previously marked out for a number of pitches but at the point of an application being submitted no pitches are marked out, as such the proposal would not be assessed against Policy HC18. Sport England are sure this is not intention of the policy and as such would wish to see the policy revised in line with NPPF paragraph 99 as included within Policy HC17 Open Spaces.

2. Criterion a states that engagement should be had with Sport England in relation to the assessment, whilst this welcomed it might not be serviceable. As such it is recommended that reference to supporting text to the policy should highlight that the applicant is encouraged to undertake an assessment in line with Sport England's needs assessment guidance for playing pitches and sports facilities.

2. Criterion b solely relates to the replacement provision being of at least equivalent quality but omits quantity as per NPPF paragraph 99b.

3. A further omission of the policy is the exclusion of paragraph 99c which is catered for within Policy HC17

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local 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 policy should be reworded to state playing field land and the exception as to when such sites could be lost or developed for alternative sports and recreational provision should be compliant with NPPF paragraph 99.

Removal of reference to Sport England within criteria a with explanation text added instead to encourage applicants to undertake assessments in line with Sport England's need assessment guidance for playing pitches and sports facilities.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure relevant policies contained within the Local Plan are compliant with national planning policy enabling Sport England to perform its statutory role of protecting playing field land.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at <https://www.sstaffs.gov.uk/planning/strategic-planning--data-protection.cfm>

Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX