

From: [REDACTED]
Sent: 03 February 2016 16:07
To: Planning Policy
Subject: 20160203 Shipley and Canal Road Corridor Area Action Plan Publication Draft

Dear Planning Policy Team,

Thank you for consulting us on the Shipley and Canal Road Corridor Area Action Plan Publication Draft, we would like to make the following comments.

Evidence base – omission (as shown on the web page)

The evidence material listed should include the recently adopted playing pitch strategy (2014) which sets out the supply and demand for pitch sports across the district. This recent study identifies significant shortfalls across the district that should be addressed through strategic planning, and site specific policies such as the AAP. This omission is not reflected by the reference at para 4.8.29 explicitly to the playing pitch strategy, which is very much welcomed.

Para – 2.16

We have previously made representations on the AAPs approach and impact on the Bolton Woods area, in particular the Gaisby Lane & King George Paying Fields site which includes playing fields containing a number of football pitches and a cricket pitch alongside ancillary changing accommodation. Similarly we have an outstanding statutory objection lodged against the 2014 masterplan application (ref: 14/04818/MAF) for this site as the proposals would result in a loss of playing fields without adequate replacement or compensation contrary to para 74 in the NPPF and the findings of the playing pitch strategy. It is arguable that the application is premature and prejudicial given the emerging status of the AAP.

Para 3.36

We welcome the reference to new and improved areas for sport will be included in the central area, however wish it to be acknowledged that the package of measures to replace the playing fields lost or prejudiced by the 2014 application does not represent adequate compensation in line with the NPPF para 74, without further research and testing that limited access to one Artificial Grass Pitch can adequately compensate for the loss of two football pitches and that the cricket pitch as relocated will not be prejudiced by the proposed adjoining development, as well as the requirement for a new relocated changing pavilion.

NBW1

Proposed use: this should specially acknowledge the sports facilities current and proposed as well as the generic reference to 'open space'.

Open Space, Sport and Recreation: first and third bullet points, this should acknowledge the wording of the NPPF para 74 second bullet point that the sports facilities will be replaced by equivalent or better provision in quantity, quality and location terms. Although this steer is in national policy, clearly as the current master plan does not deliver on this so further reiteration would be of assistance. Although we note this is covered by policy SCRC/HSC2 and point 1 and para 4.8.38.

We welcome contributions to offsite playing fields, this should be sought in line with the needs identified in the playing pitch strategy.

We welcome the acknowledgement that new changing facilities are required and crucially a cricket pavilion. A new pavilion is vital to ensure adequate compensation, ECB regulations require that the wicket table can be viewed from the pavilion to ensure change of batsmen within a timely manner. Locations for such facilities also need careful consideration with regards to car parking and access.

We welcome the final bullet point that new sports facilities should include adequate long term management provision and community access. We would recommend that '*and improved*' be added between 'new' and 'sports' to cover improved facilities.

Policy SCRC/HSC2

We welcome point 1 of this policy that reflects parent policy in the core strategy and the NPPF para 74. Part B however would indicate that just because the recreational open space has fallen out of use, it is assumed this is no longer required. In Sport England's experience often this is because the landowner has decided to shut down access rather than indicating a lack of demand. This policy should be led by research and evidence on sport and recreation rather than assumptions.

Para 4.8.38

We strongly welcome this specific wording and reference to our own policy, the playing pitch strategy and the support of the sports governing body. Please note the current masterplan submitted cannot comply with any of these aspects.

Monitoring

We recommend the implementation and delivery of the playing pitch strategy would be a useful indicator for IND9(EV) and IND8(EV) under Environment.


Appendix D : Policies Map

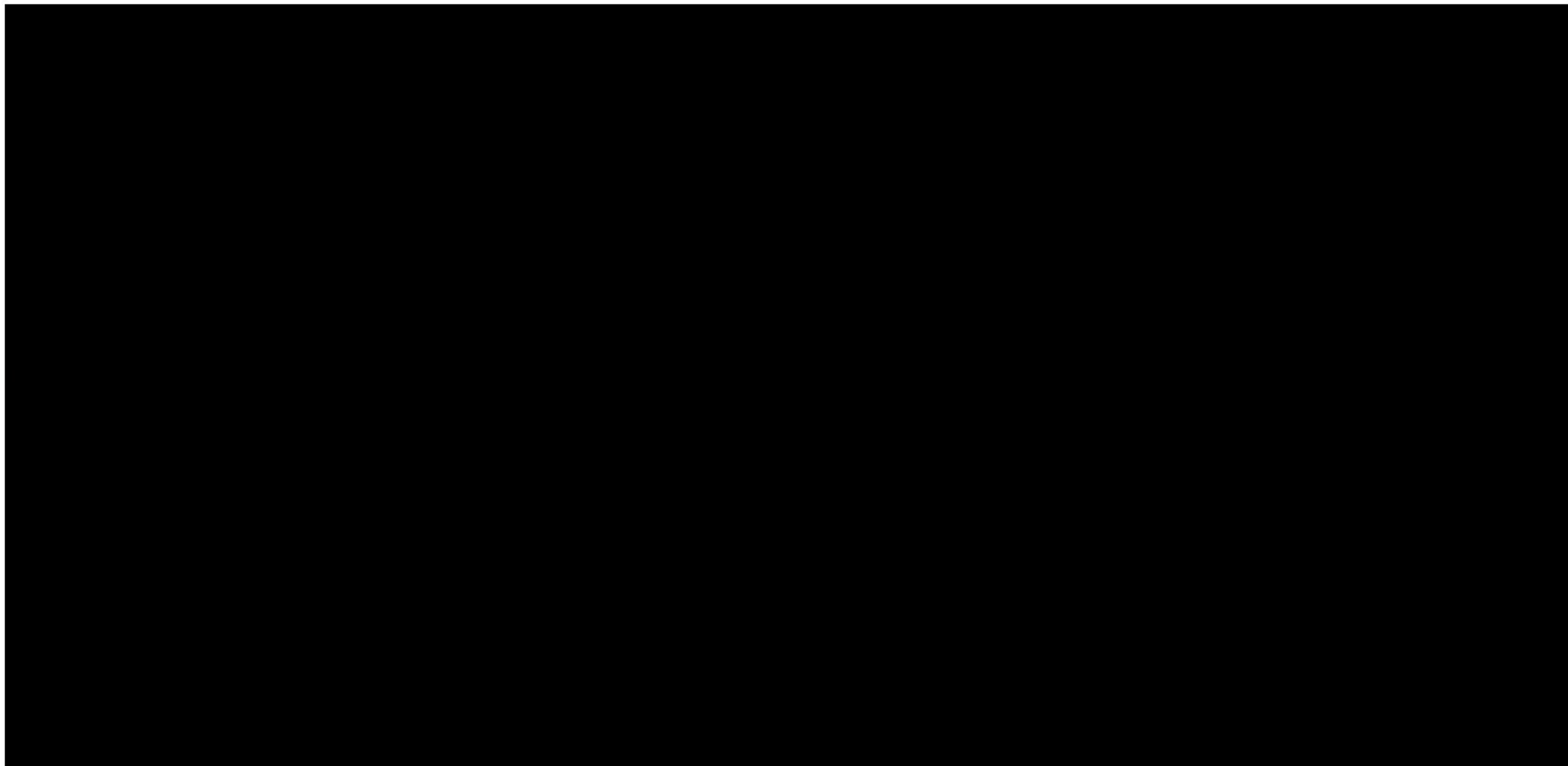
When comparing the playing fields notation with recent 2011 photographs from Google Earth this would suggest that the playing fields could extend further northwards than shown on this map. Goal posts and pitch markings are shown west of the full length of Powell Road and the southern end of Poplar Crescent. It would be worth reviewing this to ensure the notation is accurate.

I hope the above is useful in progressing the APP. Should you require further clarification please get in touch.

Your sincerely,


Principal Planning Manager

T: 
F: 
E: 



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