

The Planning Inspectorate

By email

Date: 3rd July 2025

Application Reference: S62A/2025/0107

Site: Former Friends School Field, Mount Pleasant Lane, Saffron Walden, CB11 3EB

Proposal: Erection of 75no. dwellings with associated infrastructure and landscaping. Provision of playing fields and associated clubhouse

Sport England Reference: PA/25/E/UT/70789

Thank you for consulting Sport England on the above application.

Summary

An **objection** is made to this planning application due to the loss of playing fields not according with Sport England's Playing Fields Policy, the NPPF or the adopted Local Plan. The improvements made in the current application to address issues and concerns raised about the design and layout of the retained on-site playing field facilities in the 2024 planning application are acknowledged although several amendments to the design and layout are **requested** to be made before the application is determined.

This objection could be addressed if appropriate off-site replacement playing field provision could be secured or significant amendments were made to the current scheme as set out in the response.

Without prejudice to the above position, if the Planning Inspectorate is minded to approve the application, three planning conditions are **requested** to be imposed to address matters relating to the playing field works construction specification, non-turf cricket pitch design specification and ball strike mitigation design details as set out in this response.

Sport England – Non Statutory Role and Policy

It is understood that the site forms part of, or constitutes land last used as playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595).

However, as the playing field (the former Friends School playing field) has not been used for at least five years, this consultation with Sport England is not a statutory requirement.

Notwithstanding the non-statutory nature of the consultation, Sport England has considered the proposal in the light of the National Planning Policy Framework (particularly Para 104) and Sport England's policy on planning applications affecting playing fields www.sportengland.org/playingfieldspolicy which states:

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions which are set out in annex 1 to this response.'

The Proposal and its Impact on the playing field

In summary, the proposal involves a full application for the redevelopment of the majority of the former Friends School's playing fields for residential comprising 75 dwellings and associated infrastructure and landscaping. The secondary element of the application is the reinstatement of the southern part of the former school playing fields to sports pitches for community use and the development of an ancillary clubhouse and car park to support the use of the sports pitches. Friends School closed in 2017 and the school's playing fields, that had significant community use when the school was open, have since been closed and have not been made available for use since then.

As set out in the Planning Statement, a 2019 hybrid planning application (Ref: UTT/19/1744/OP) for the redevelopment of the playing fields was refused by Uttlesford District Council in 2021 partly on the basis of the impact on playing fields (refusal reason 6). In 2022, the Planning Inspectorate approved planning permission (S62A/22/0000002) for the redevelopment of the adjoining school buildings for residential and supporting uses. This application resulted in the loss of a small part of the playing field (approx. 0.15 ha) and the pavilion and car park which supported the use of the playing field. In 2024, the Planning Inspectorate refused planning permission (S62A/2024/0057) for the redevelopment of the playing fields partly on the grounds that the proposal would lead to a loss of a significant area of playing field.

The current application would result in the loss of the north and central areas of the former school's playing field. It is estimated that this area would comprise of around 2.81 hectares as shown within the red line on the aerial image below taken from Google Earth Pro. The area within the red line excludes the area of the playing field that was approved for development in the 2022 planning application and areas around the periphery of the playing field that would be incapable of

being used for forming a playing pitch or part of one. It also excludes the area proposed for the pavilion and car park to support the reinstated sports pitches.



The following assessment has been divided into an assessment of the loss of the playing fields and an assessment of the proposed sports facilities.

Assessment against Sport England's Playing Fields Policy and the NPPF

Loss of Playing Fields

I have considered the application proposals with regard to the specific exception criteria identified in the above playing fields policy and would make the following assessment:

- Exception 1 – Not applicable. It has not been demonstrated that there is an excess of playing pitches in the catchment in terms of community playing pitch provision. In this regard, to inform current and future playing pitch needs, Uttlesford District Council completed a Playing Pitch and Outdoor Sports Strategy & Action Plan <https://www.uttlesford.gov.uk/article/4942/Infrastructure> in 2019 which assessed playing pitch provision across the district and for the Saffron Walden sub-area of the district. The needs assessment report which supports the strategy was prepared in accordance with Sport England's Playing Pitch Strategy Guidance https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=assessing_needs_and_playing_pitch_strategy_guidance and the strategy was endorsed by Sport England and the sports governing bodies which represent the pitch sports. The strategy was therefore considered to provide a robust evidence base to support the preparation/implementation of local plan policies and the determination of planning applications.

While the strategy documents provide full details of the conclusions, key data on football pitch provision is provided in Table 2.16 of the assessment report which shows that there was a total deficiency of 14 football pitch match equivalent sessions in the Saffron Walden analysis area in relation to meeting current demand which would extend to 18 match equivalent sessions after future demand was accounted for. In relation to cricket, Table 5.16 of this document shows that there was current deficiency of 8 cricket match sessions in relation to meet current demand in the Saffron Walden analysis area which would extend to 66 match sessions after accounting for future demand. In relation to rugby union, Table 4.13 shows a deficiency of 3.75 match sessions for the rugby pitches that serve the Saffron Walden sub-area in relation to meeting current demand which would extend to 8.25 pitches after future demand was accounted for.

Uttlesford District Council has recently completed a new Playing Pitch and Outdoor Sports Strategy to update the 2019 strategy. While not all of the strategy documents have yet been published, the Council has published the 'Winter Assessment Report' (June 2024) <https://www.uttlesford.gov.uk/reg-19-evidence> following the completion of the needs assessment for the winter sports that include football and rugby. Like the 2019 strategy, the assessment has been prepared in accordance with Sport England's guidance and the document has been supported by Sport England and the relevant sports governing bodies. Key data on football pitches is set out in Table 2.39 which summarises the position for the North Uttlesford analysis area which covers Saffron Walden and the surrounding rural area. This shows current deficiencies of adult, youth 11v11 and youth 9v9 football pitches (9 match equivalent sessions in total) and future deficiencies of the same pitch types (14 match equivalent sessions in total). Key data on rugby pitches is set out in Table 4.22. The two rugby clubs that serve Saffron Walden (Saffron Walden RFC and Wendens Ambo RFC) have their facilities in the Rural North and Thaxted analysis area. The table shows that there is a deficiency of 6.5 match equivalent sessions per week which extends to 8.5 sessions after accounting for future demand. While the summer sports assessment has not been published yet, Appendix 2 of the Winter Assessment Report indicates that the number of cricket teams in the district has marginally increased by one team since 2019. As the supply of cricket facilities in the Saffron Walden area has not changed since 2019, the deficiencies identified in 2019 will not have been reduced and this has been confirmed by the ECB and Essex Cricket.

Consequently, there are significant current and future playing pitch deficiencies in the local area relating to all of the playing pitch types that were accommodated when Friends School's playing fields were last in use. As set out below, the 2019 Playing Pitch Strategy's recommendation was for the pitches on the application site to be brought back into use to help meet current and future community playing pitch needs. The proposals for reinstating part of the playing field as part of the planning application would not address these identified deficiencies although they would contribute towards addressing them.

It should be noted that when assessing planning application S62A/22/0000002 in 2022, the Inspector concluded in paragraph 31 of the decision notice that it was clear that the playing field is not surplus to requirements. Furthermore, more recently, the Inspector assessing application S62A/2024/0057 confirmed in paragraph 28 of the decision notice that the pitches at the application site are not surplus to requirements.

- Exception 2 – Not applicable. The proposed residential development, which represents the majority of the development affecting the playing field, is not ancillary to the principal use of the site as a playing field. The proposals for the clubhouse and car park would in principle accord with this exception although it should be acknowledged that the loss of part of the playing field to accommodate these essential ancillary facilities has been necessitated by the loss of the existing pavilion and parking facilities approved by application S62A/22/0000002.
- Exception 3 – Not applicable. The majority of the area proposed for the residential development is capable of being used for a range of playing pitches and was historically used by Friends School and the local community for a wide range of pitches including football, cricket, rugby and athletics as shown in the aerial photographs in annexes 2 and 3 to this response.
- Exception 4 – Not applicable. No replacement playing field provision is currently proposed. While the proposals for bringing the southern part of the existing playing field back into community use are welcomed in principle this does not constitute replacement playing field provision as the site is an existing playing field and therefore there would be a significant net loss in the quantity of playing field provision if the application was approved. Even though the area of playing field that would be lost in the current application is slightly less than in application S62A/2024/0057, the Inspector concluded in paragraph 32 of the decision notice that the quantity of playing field would be significantly reduced.
- Exception 5 – Not applicable. The proposal is not for a sports facility. The residential development which results in the loss of the majority of the playing field would clearly not constitute a sports facility and the proposals for reinstating the playing fields to the south of the site involve reinstating an existing playing field back into operational use rather than a new sports facility.

As set out in paragraph 21 of Sport England's Playing Fields Policy, the policy is in line with the Government's commitment to the protection of playing fields set out in paragraph 104 of the Framework. The policy and its supporting guidance provide clarification to assist with assessing planning applications. Exceptions 1, 4 and 5 of the policy relate to the three criteria in paragraph 104. As set out above, these exceptions are not considered to be applicable.

On the basis of the above assessment, the proposal would not, in its current form, be considered to accord with any of the exceptions to Sport England's playing fields policy or the criteria in paragraph 104 of the NPPF.

In addition to the above assessment of how the proposals relate to the exceptions in our playing fields policy and the NPPF, the following considerations are relevant to the assessment of this proposal:

- *Development Plan Policy:* Policy LC1 (Loss of Sports Fields and Recreational Facilities) of the adopted Uttlesford Local Plan (2011) resists the loss of playing fields and broadly aligns with paragraph 104 of the NPPF and Sport England's Playing Fields Policy. The Proposals Map also identifies the majority of the application site as a Protected Open Space for Playing Fields. It is not therefore considered to be out-of-date as suggested by the applicant in paragraph 6.10 of the Planning Statement. It should also be noted that reason 6 for refusing the previous 2019 application (UTT/19/1744/OP) on this site was that it was contrary to Policy LC1. The Inspector considering application S62A/2024/0057 confirmed in paragraphs 24 and 34 of the decision notice that Policy LC1 was broadly in line with paragraph 103 (now 104) of the Framework. Furthermore, it should be noted that Core Policy 67 of Uttlesford District Council's emerging Local Plan (2021-2041) which is currently at examination also takes a similar approach to the protection of playing fields which broadly accords with the NPPF.

Paragraph 11.2.1 of the made Saffron Walden Neighbourhood Plan (2022) <https://www.uttlesford.gov.uk/article/4963/Saffron-Walden-Neighbourhood-Plan> which forms part of the Development Plan specifically opposes the loss of the former Friends School's playing fields and notes that they are protected by the NPPF and the Local Plan.

- *Uttlesford Playing Pitch Strategy:* As well as identifying significant deficiencies in football, cricket and rugby pitch provision as set out above, the 2019 strategy's action plan (see Walden School entry) specifically recommended that the playing field be brought back into use to support with reducing both current and future shortfalls of football and cricket provision in the Saffron Walden Analysis Area unless the loss of playing fields was mitigated by replacement provision. While an updated strategy and action plan has yet to be published by the District Council to support the updated strategy, given that the winter assessment report referred to above has identified that the playing pitch deficiencies identified in 2019 have persisted it is considered unlikely that the recommendation for this site will change. Furthermore, the Inspector considering application S62A/2024/0057 noted in paragraph 28 of the decision notice the above findings and recommendations from the 2019 and the emerging playing pitch strategies. The loss of the majority of the playing fields would therefore be contrary to the District Council's playing pitch strategy recommendation for the site. Reinstating the whole of this site is considered by Sport England and the sports governing bodies to represent one of the few

opportunities available in Saffron Walden for helping to address the identified deficiencies.

- *Playing Field Community Use:* While the site is not currently publicly accessible and did not have unrestricted public access when Friends School was open, the playing fields were significantly used by the community outside of school hours until the school closed in 2017. As set out in the Council's 2019 Playing Pitch Strategy Assessment, the playing fields were used extensively by local football clubs, Saffron Walden Cricket Club, Wendens Ambo Rugby club, Walden Tri triathlon club and Saffron Striders Running Club. The closure of the site in 2017 had a significant impact on community users.

Saffron Walden Community Football Club (SWCFC), which has 75 affiliated teams and nearly 1,000 registered players had extensive use of three football pitches on the site which were considered at the time to be the best quality football pitches in Saffron Walden. The shortage of football pitches in Saffron Walden has forced the club to use pitches in outlying villages and is preventing the club from expanding further. The club have made separate representations on this planning application which provide more detail.

Saffron Walden Cricket Club's 3rd, 4th and 5th teams used the cricket square on the site along with their junior sides and the square was considered by the club to be good quality and well maintained. The square had approximately 11 pitches (wickets) which allowed for around 20 matches to take place each cricket season. As a result of losing access to the site, the club now has to travel to Great Chesterford to meet their match needs which necessitates travel by car.

Wendens Ambo Rugby Club used to use the rugby pitches for matches and training and since the school closed now have to play outside of Saffron Walden at Carver Barracks.

Walden Tri (Triathlon) Club used the playing field for running and cycling training along with the school's swimming pool. This allowed training to take place in all three triathlon disciplines in one location. Following the closure of the school, the club now has to use dispersed facilities including facilities outside of Saffron Walden.

As the application site's playing field is one of the largest playing fields in Saffron Walden, the loss of access to all of the pitches that it provided (see aerial photos in annexes 2 and 3 to this letter which showed a typical number and range of pitches that were in use when the school was open) when it closed has inevitably had an impact on the deficiencies in pitch provision identified in the Council's Playing Pitch Strategy. Furthermore, community access to the school's sports facilities including the playing fields was formalised by the completion of a formal community use agreement in 2011 between Friends' School and Uttlesford District Council which has been submitted in support of the planning application. The community use agreement made provision for the pitches to be made available for community use on both Saturdays and Sundays throughout the academic

year. The extent of the community use of playing field was recognised by the Inspector when planning application S62A/22/0000002 was assessed in paragraph 28 of the decision notice. Similarly, the Inspector considering application S62A/2024/0057 recognised the extent of community use in paragraph 25 of the decision notice.

In paragraphs 6.26–6.31 of the Planning Statement, the applicant makes a case that the proposal will significantly increase pitch availability for community use compared to when Friends School was open. It is accepted that community use of the retained area of the playing field will not be restricted by school requirements and that the amount of community use of the pitches could potentially be increased compared to when the playing fields were in shared use. However, the extent of potential additional community use needs to be considered in the context of the following considerations:

- While the sports pitches may have been used for 4–5 hours per day by the community on Saturdays and Sundays when the community use agreement (CUA) was completed in 2011, as confirmed by page 14 of the CUA, community use was allowed for up to 8 hours on both Saturdays and Sundays (apart from 4 hours on Sundays between April–June). The references in paragraph 6.26 and 6.27 of the Planning Statement to the pitches only being available for 3–4 hours per day on Saturdays and Sundays and up to 8 hours per week are not therefore correct.
- In practice, the actual community use of the pitches will be determined by the requirements of local sports clubs and the carrying capacity of the pitches rather than the total availability of the pitches. Peak time use for community football is generally Saturday and Sunday mornings during the September to May period and for cricket peak time use is generally Saturday and Sunday afternoons during the April to September period. The hours of community use permitted by the CUA when the school was open therefore broadly met the needs of local football and cricket clubs and additional use outside of the hours permitted by the CUA was not sought. Essex Cricket have advised for example that Saffron Walden Cricket Club did not have any restrictions imposed on the time that they used the playing fields at weekends when the school was open. The separate representations made by Saffron Walden Community Football Club also advise that the pitches were rarely unavailable when the club needed access to them.
- While some evening midweek cricket and football use may be possible in the summer period, it is considered unlikely that there would be much demand to use the pitches during weekdays due to the lack of lighting to support evening use and the need to maintain the quality of the pitches following peak time use at weekends.

As such, the applicant's assertion in paragraph 6.30 of the Planning Statement that the proposals will allow an increase in usage of up to 8 hours per day on Saturdays and Sundays or an increase of 569 hours per year and an increase

of 2 hours per evening or 260 hours of usage during the evenings is incorrect. In practice, the amount of community use of the pitches that would take place on the retained playing field would be expected to be broadly similar to when the school was open. The main difference in practice to community hours of use is more likely to be due to community use not being restricted by occasional school matches/events at weekends and improvements to the drainage of the pitches potentially reducing the number of matches that are cancelled at weekends.

- *Playing Field Status:* Sport England considers proposals for the development of playing fields that are no longer in use in the same way as playing fields that are in active use because development on them would permanently prevent such sites from being brought back into use. Even if the playing fields are no longer needed for educational use this does not affect our position. Sport England's playing fields policy and the Government planning policy on playing fields (in paragraph 104 of the NPPF) does not distinguish between public and school playing fields and whether playing fields are currently in use or not. The policy approach that is applied is the same and this is the approach established through planning case law. It should be emphasised that Sport England's role is to safeguard playing fields for meeting the needs of current and future users. While this playing field may not be needed for its previous educational use now or in the future, safeguarding it is justified for meeting current and future community playing pitch needs as set out above and justified by the deficiencies identified in the Council's playing pitch strategy. Policy LC1 of the adopted Local Plan takes a similar approach as paragraph 7.2 of the reasoned justification makes it explicit that sites are protected by the policy whether they are in active use or not and whether through ownership access is prevented.

While there is no current community use of the site's playing fields, this is because the site closed for community use when the school closed in 2017 and access has not been permitted since then. The applicant accepts in paragraph 7.2 of the Planning Statement that they have no interest in reinstating the site as a playing field without residential development on part of the site. The lack of use is not because there is a lack of demand for using the playing fields by the community. Furthermore, there would not appear to have been any attempts made to make the playing fields available for potential management by community bodies (e.g. local authorities and sports clubs) to allow the facilities to re-open since the school closed. As set out in paragraph 32 of the decision notice for application S62A/2024/0057 the Inspector concluded that the removal of the associated changing rooms as part of the development of the adjoining suite has contributed to the playing fields being unable to be used. The lawful planning use of the site would also remain as a school playing field regardless of whether the site is available for use. There is no obligation under planning law for a playing field to be in active use to justify its protection. In the decision notice for S62A/2024/0057 the Inspector concluded in paragraph 27 that despite the playing fields not being in use for a lengthy period they were a valuable resource and if development

were to occur there would be no prospect of the existing playing fields being used.

- *Playing Field Quality:* Paragraphs 6.14–6.23 of the Planning Statement present a case that the playing fields were poor in terms of quality and in need of improvements. In particular, it is implied that the current drainage and gradients of the site may be unsuitable for sports use and that the site may not be playable by current standards. The submitted feasibility report prepared by Sports Turf Consulting that has informed these assertions is considered to be robust and the conclusions in the report that the characteristics of the site would not meet Sport England's Performance Quality Standard https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces?section=natural_turf_sports_pitches for natural turf playing fields in relation gradients and drainage is not disputed. However, the following comments are made in response:

- The Performance Quality Standard (PQS) sets high standards for playing fields to meet in order to provide a benchmark to help ensure that the quality of playing fields are as good as they can be from a performance and useability perspective. However, based on Sport England's experience, in practice the majority of playing fields, especially school playing fields, do not meet all of the standards in the PQS. This is often due to the maintenance programme that is implemented but it is also commonly due to drainage and gradient considerations. From a practical and financial perspective it is often difficult for playing field operators to meet the PQS in practice especially if this requires the installation of a primary drainage system and/or major cut and fill operations to address gradient constraints. It should not be interpreted that a failure to meet the PQS in relation to gradients or drainage standards would mean that a playing field is unplayable or would be unsuitable for meeting the needs of the pitch sports. While pitches with poor drainage or gradient characteristics may have a reduced carrying capacity or may be less desirable from a performance perspective they are still used in practice for community sport. For example, the feasibility study has identified that the playing field soil type is clay loam and therefore infiltration rates will be low. However, the majority of operational playing fields in Essex have a clay loam soil and do not benefit from a primary drainage system. While such playing fields may not meet all of PQS standards they still make a significant contribution towards meeting community playing pitch needs.
- The study area for the feasibility study was just the southern part of the Friends School playing field which is understood to be inferior in terms of gradients at least to the northern part of the playing field that would be lost to the residential development. The extent of works required to allow the southern area to meet the PQS standards is therefore expected to be greater than the northern part. It should not therefore be interpreted that

the quality of the whole playing field site was the same as that covered in the feasibility study.

- An independent Sports Facilities Development Strategy <https://www.uttlesford.gov.uk/article/4942/Infrastructure> prepared for Uttlesford District Council in 2016 audited the site when it was still in shared school and community use. While this strategy has now been superseded by the more recent Playing Pitch Strategies referred to above, the site assessments confirmed on pages 101 and 124 that the football and cricket pitches at Friends School were 'good quality' at the time. Saffron Walden Community Football Club and Saffron Walden Cricket Club have also confirmed that the pitches were in their view good quality when the school was open. This is confirmed in the football club's representations on the application which sets out that the pitches that they used were flat well drained and impeccably maintained.
- The applicant's assessment of the quality of the pitches that were marked out on the site in 2006 in paragraphs 6.15–6.16 of the Planning Statement should not be afforded weight as this suggests that only one football pitch that was marked out at the time would be reasonably playable by today's standards. Pitch configurations on school playing fields change from year to year and from season to season. The quality of the playing fields should be considered in the context of the comments made above and the feedback of the governing bodies set out later in this response. The playing pitch configuration for meeting the Friends School's educational playing pitch needs in 2006 should not be used as a basis for considering whether the playing field could be used for meeting community playing pitch needs in 2025 as they are very different. In Sport England's and the sports governing bodies view, the whole of the playing field would offer the potential for meeting a range of community playing pitch needs in terms of both the number and types of playing pitch even after accounting for the quality considerations that have been identified.
- The proposed investment into addressing the qualitative deficiencies of the southern area of the playing field and providing the new clubhouse, which totals around £1,880,000 based on the figures provided by the applicant in paragraph 6.35 of the Planning Statement, are welcomed. However, in Sport England's view this level of investment does not mitigate the loss of the majority of the playing field as despite the qualitative improvements to the southern area that will be facilitated there will still be a significant loss in the quantity of playing field provision (around 2.81 ha) and the overall capacity of the playing fields in terms of pitches that could be accommodated will be reduced as acknowledged by the applicant in paragraph 6.33 of the Planning Statement. As set out in the Football Foundation's feedback later in this response, the number of football pitches that could be accommodated on the site would be reduced from around six to two for instance. In practice, while qualitative deficiencies of playing fields can usually be addressed through investment, quantitative losses are

much more challenging to address as it is usually very difficult to deliver suitable replacement playing fields that would maintain the quantity of provision to mitigate loss especially in urban areas like Saffron Walden where there are understood to be no suitable and available sites for creating new playing fields. This is why Sport England's policy (exception 4) and NPPF paragraph 104 require replacement playing field provision to be equivalent or better in both quantity and quality to be acceptable. Furthermore, the clubhouse is an ancillary facility rather than a pitch and is replacing a pavilion that used to exist on the school site rather than providing a new facility although it is accepted that the size and quality of the clubhouse is significantly better than the former pavilion.

- *Enabling Development:* While acknowledging that the applicant is unlikely to wish to bring forward the reinstatement of the playing field without enabling residential development, it should be pointed out that enabling development does not accord with Sport England's Playing Fields Policy as set out in paragraph 80 of the policy. Paragraph 104 of the NPPF also does not support enabling development on playing fields.
- *Financial Contribution to Off-Site Mitigation:* In the context of the applicant's acknowledgement of the reduction in the overall number of pitches that were available on the playing field, paragraph 6.33 of the Planning Statement proposes a financial contribution of £75,000 towards the provision of a floodlit 3G artificial grass pitch (AGP) elsewhere in Saffron Walden. An additional 3G AGP is the Football Foundation and the Essex County FA's strategic priority for helping towards meeting football facility needs in the Saffron Walden area as set out in their recent Uttlesford Local Football Facilities Plan (2024) <https://localplans.footballfoundation.org.uk/local-authorities-index/uttlesford/uttlesford-local-football-facility-plan-2024/> that was prepared in consultation with Uttlesford District Council. A site at Saffron Walden Football Club has been identified for delivering this project but there is insufficient funding available at present to deliver the facility. The principle of a contribution being offered towards the delivery of this project is welcomed by Sport England, the Football Foundation and the Essex County FA as part of the mitigation for the loss of the playing fields. A 3G AGP, while principally used for football training, can also be used for adult, youth and mini football matches if suitably designed. However, a financial contribution of £75,000 would only represent less than about 10% of the current capital cost of delivering a new AGP (current total cost is estimated by Sport England to be £1,175,000). A contribution of this scale would also not be considered to be sufficient to mitigate the loss of the area proposed for residential which extends to around 2.81 hectares and which could accommodate up to four natural turf football pitches of different sizes.

Sport England advised the applicant at pre-application stage that the current capital cost of replacing a natural turf playing field of 2.81 hectares using Sport England's methodology and costings would be estimated to be £541,206. While

it is not suggested that increasing the financial contribution that has been offered to this amount would provide acceptable mitigation for the loss of the playing field and allow the proposals to accord with Sport England Playing Fields Policy or the NPPF, if the Inspector was minded to approve the application on the basis that an appropriate financial contribution was considered (by the Inspector) to be acceptable in principle to mitigate the quantitative loss of the playing field to residential this would be the amount that would be recommended. It should be emphasised that this advice is provided on a without prejudice basis to our position on the loss of the playing fields.

To complement the above assessment I have consulted the relevant sports governing bodies for their feedback on the application which can be summarised as follows:

Football Foundation (who represent the Football Association and Essex County FA)

- The Football Foundation and Essex FA do not support the proposal in its current form due to the loss of playing fields.
- When consulted on the 2024 planning application (S62A/2024/0057) for this site, we identified the shortfall of football pitches based on the 2019 Playing Pitch Strategy (PPS). Affiliated teams had also grown from 163 when the PPS was developed in 2019, to 211 in 2024, therefore demand had increased further which adds to existing shortfalls. The application represents a significant loss of playing field, with only two football pitches proposed, therefore not bringing the entirety of the playing field back into use which would have a greater impact on addressing shortfalls, since the site previously accommodated one adult 11v11 pitch, two 11v11 youth pitches, two 9v9 pitches and a 7v7 pitch.
- While the Sports Turf Consulting feasibility report which has been prepared by a specialist consultancy is supported and its findings are not disputed, the following observations are made:
 - Reference is made in the report to the site having been neglected. Therefore we feel it is reasonable to suggest the current site conditions are not likely to be similar to those present when there was regular maintenance and regular community use. They are therefore not a measure of the value (historic or potential) of the playing field.
 - The report states that historical images (from 2003 and 2005) show the pitches would have failed several Performance Quality Standard (PQS) criteria. We are not confident that PQS scoring can be achieved via this method, and have not experienced such assumptions in agronomy reports in the past. If it were the case that some elements historically would have failed parts of PQS, it is worth noting that the football community still utilised these pitches and attached value to them, therefore failing elements of PQS does not remove the value of those facilities. Notably, many pitches fail

elements of PQS but still have community use. Imagery from outside of those two dates – such as from 2000 and 2006 – appears to show the pitches in better condition, therefore we would discourage assumptions of quality based on such assessments, which could be influenced by a variety of temporary factors at that time which we aren't able to account for now (such as weather, maintenance, image quality, usage etc.). Finally, the references to poor grass coverage don't account for the potential that this could have been the case due to high demand (usage) on the pitches. This wear and tear can often be caused due to overplay on pitches where demand exceeds the pitch capacity. This is an important consideration given our wider response of the local demand and shortfall of pitches (as measured by the Playing Pitch Strategy, growth in affiliated teams since its production, and anecdotal club feedback).

- The scope of the works was to undertake feasibility for the proposed pitches. The quality of the playing field that was assessed is shown in the report with a red line boundary, and specifically relates to this area. The remaining playing field (i.e. the pitches to the north of the site) therefore don't appear to have been assessed for their quality. As the area of playing field being lost, understanding the quality of that area of playing field is also helpful to understand the loss.
- The following feedback is provided on the submitted Planning Statement:
 - Paragraph 6.12 states that the “land has never been publicly accessible” however it was extensively used by community football clubs. It also states there are no playing fields marked on the land and they have not been used for several years. This is due to change of ownership and management of the site, not lack of demand, therefore we do not feel this should influence the importance of protecting playing field in an authority where there are identified shortfalls.
 - Paragraph 6.15 references previous pitch sizes being sub-standard in some cases. This table only considers recommended dimensions, which are a preference, but minimum and maximum permitted dimensions should also be considered. It also suggests the soil percolation means they are not suitable for winter sports. However they haven't been used or maintained for several years (the feasibility report references the years of neglect, which we expect could have resulted in the current unsuitability, but which could be resolved through improved care and maintenance). It also suggests drainage is a requirement, which is unclear – as most sites don't have drainage and this site previously operated successfully without drainage.
 - Paragraph 6.23 suggests that, without enabling development, investment in nets, drainage etc. would not occur. This is an assumption and not consistent with many sites across the country that are managed and developed without enabling development. Furthermore, with the right

security of tenure in place, there are various funding sources that can be accessed to facilitate improvements without enabling development.

- Paragraph 6.24 states that the 2024 Uttlesford PPS Winter Sports Assessment identifies spare capacity on adult, 9v9, 7v7 and mini 5v5 pitches but shortfall in youth 11v11. Having reviewed the PPS, the document includes the following statement on page 52 which would contradict this: *“Across North Uttlesford, there is a current shortfall of adult, youth 11v11 and youth 9v9 pitches, whilst mini 7v7 and mini 5v5 pitches have spare capacity. When accounting for future demand, shortfalls across adult, youth 11v11 and youth 9v9 pitches worsen, whilst the spare capacity amongst mini 7v7 and mini 5v5 pitches diminishes slightly”.*
- The suggested £75,000 contribution toward 3G pitch development in paragraph 6.33 of the Planning Statement would be a helpful contribution given the evident shortfalls locally, however it does not appear to be relative in scale given this investment equates to less than 10% of the cost of a typical 11v11 3G pitch but is associated with the loss of four grass pitches. We believe this figure should cover mitigation for the loss of one adult, two 9v9 and one 7v7 pitches. Furthermore, the population from the residential development will generate a small level of additional demand for grass pitches, training (3G) provision and ancillary facilities which does not appear to have been considered. The financial figures referenced for grass pitch works and ancillary should recognise that enhanced works are required owing to the long period where no maintenance has taken place – resulting in the need for more extensive works – and that the previous ancillary facilities have been lost – therefore they are a replacement for facilities which previously supported the site not mitigation for the loss of playing fields.
- An appropriate off-site contribution towards football facility projects within the local area would be supported as part of a mitigation package.

Rugby Football Union (RFU)

The RFU have confirmed their support for findings of the 2024 Uttlesford Playing Pitch Strategy winter assessment which show a significant shortfall of rugby pitch provision in the district which will be exacerbated by future population growth. In the absence of any on-site mitigation, the RFU would be willing to accept the principle of off-site mitigation in the form of financial contributions being secured towards improving rugby pitch and changing room capacity at existing rugby club sites in the local area.

England & Wales Cricket Board (ECB) and Essex Cricket

The pitches on the northern part of the site were excellent and right beside the changing tooms. While reference is made in the Planning Statement to the cricket

square being increased from 5 wickets to 8 senior wickets and 4 junior wickets, in practice the school typically marked out an 11 wicket square not a 5 wicket square.

Saffron Walden Cricket Club had absolutely no restrictions on accessibility to the site when the school was open. The only exception was to allow for school games but otherwise the club could play whenever they wished.

Football and Cricket Pitch Facility Design, Layout, Operation and Delivery

If considered in isolation, the proposal to reinstate the southern part of the Friends School playing fields to football and cricket pitches supported by a new clubhouse and ancillary car parking is welcomed in principle. This would respond positively to the recommendations of the Council's Playing Pitch Strategy relating to the site and would offer the potential to make a contribution towards meeting the local football and cricket pitch deficiencies identified in this strategy. The Football Foundation and the England & Wales Cricket Board (ECB) would also welcome the principle of the site being reinstated to community use.

In response to the concerns raised in the decision notice for application S62A/2024/0057 about the lack of engagement with the local sports community about the design and layout of the retained facilities in order to demonstrate that they would meet local needs in practice, it can be confirmed that the applicant has engaged with Sport England and the sports governing bodies to inform the design and layout of the current proposal at pre-application stage.

Notwithstanding the concerns raised above about the loss of playing fields, the applicant's approach to the retained playing field on this application is welcomed. The design and layout of the sports pitches and the ancillary facilities in the current scheme is broadly supported by Sport England and the sports governing bodies as the applicant has responded positively to pre-application engagement. In summary, the key changes made in the current application to address issues raised about application S62A/2024/0057 are as follows:

- Cricket Square: The previous two pitch (wicket) square has been replaced with a 12 pitch square (8 senior and 4 junior pitches) and one of the pitches would be a non-turf (artificial) cricket pitch for training purposes. This would be broadly equivalent to the number of pitches (typically 11) that were provided in the cricket square when the school site was open and would include a non-turf pitch which previously did not exist on the school site. This is responsive to the pitch needs of Saffron Walden Cricket Club.
- Football Pitches: The previously proposed 9v9 youth football pitch and 11 v 11 youth football pitch has been replaced with 2 x 11v11 U13/U14 youth football pitches (82 x 50m) although the Proposed Site Layout refers to 2 x U11/U12 pitches (which are 9v9 size) which is confusing. Assuming that 2 x 11v11 U13/U14 youth football pitches are actually proposed, these would be more responsive to the pitch needs of Saffron Walden Community Football Club than the pitches proposed in the 2024 scheme and would help address the deficiencies

of this pitch type identified in the recent Uttlesford Playing Pitch Strategy Winter Sports Needs Assessment.

- **Playing Pitch Construction:** The application has been supported by a feasibility study prepared by Sports Turf Consulting which is considered to be robust. This has identified qualitative improvements required to allow the cricket and football pitches to meet the Performance Quality Standard including levelling and primary drainage works which the applicant proposes to deliver as part of the proposals.
- **Clubhouse Design:** The internal layout of the clubhouse has been amended in response to feedback on the 2024 scheme. In particular, the kitchen has been relocated to allow an external servery to be provided and an accessible changing room has been included which can also be used as a second officials changing room if required,
- **Ball Strike Risk:** A cricket ball strike assessment prepared by Labosport has been submitted which is considered to be robust. In summary, the report has identified potential risks to the west and north of the proposed cricket square which require mitigation. An area along the western boundary of the playing field is recommended for a 5m high mitigation solution and an area along the northern boundary of the playing field is recommended for a 1m high mitigation solution. The recommendations of the report are understood to have been accepted by the applicant.
- **Car Parking:** A 25 space car park is proposed to serve the playing field and it has been interpreted that this is to be dedicated for use by users of the playing field. Concerns had been raised about application S62A/2024/0057 that the car park was to also be used for visitor parking to support the residential development.
- **Playing Field/Clubhouse Management and Maintenance:** It is proposed that the playing field will be initially offered to Saffron Walden Town Council to manage who would be an appropriate management body. Provision is also made for an initial maintenance contribution of £234,000 towards the maintenance of the playing field, clubhouse and woodland. The views of the Town Council should be sought on the acceptability of these proposals.

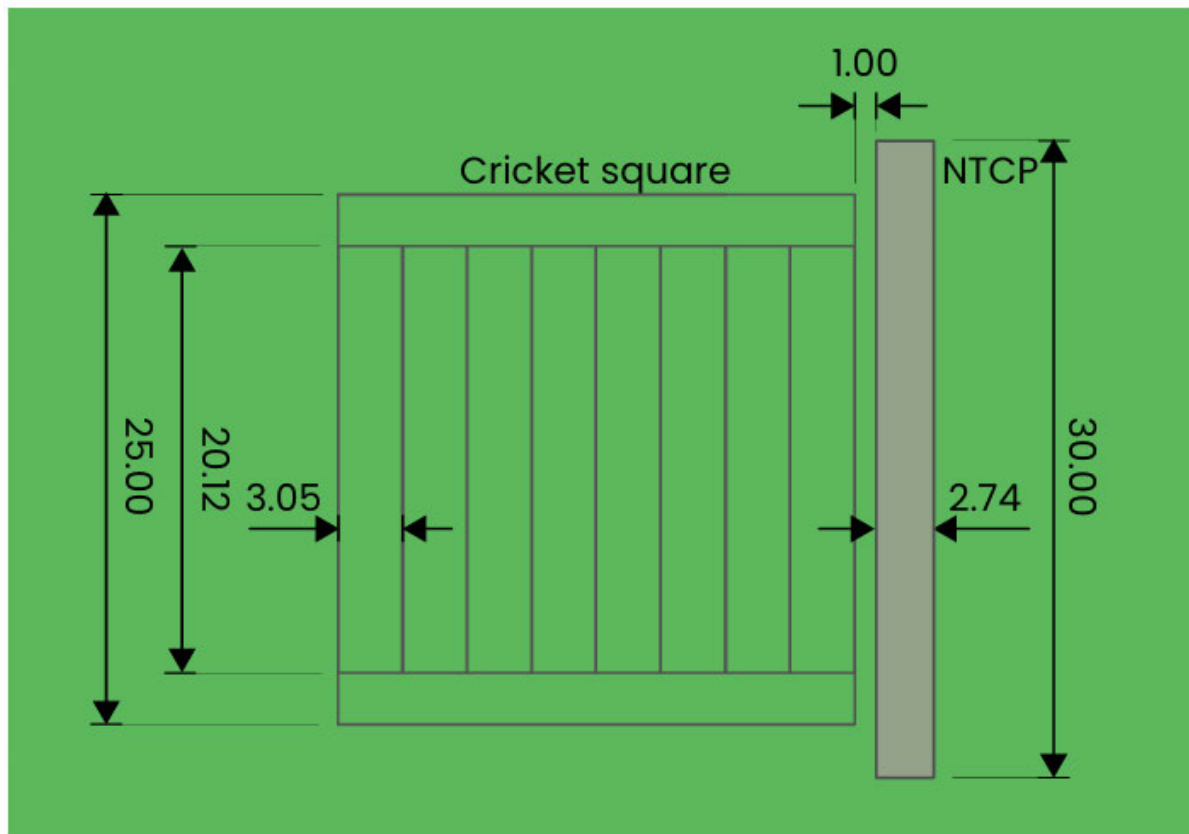
The proposals for the retained playing field and ancillary facilities are therefore broadly supported if considered in isolation. However, the following comments are made:

- **Cricket Square:** The ECB has **requested** that it be checked that the site plan has allowed sufficient space for the length of the cricket pitches including the non-turf cricket pitch (artificial pitch) because measuring off the 'Proposed Site Layout' drawing there would not appear to be sufficient space allowed. As shown in the extract below taken from Sport England's Natural Turf for Sport design guidance https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces?section=natural_turf_sports_pitches each natural turf pitch should

be 25m in length and the non-turf cricket pitch should be 30cm in length to meet ECB guidance. There should be at least a 3m run-off area between each cricket pitch and the closest football pitch. Unless this has been considered there would be a risk that both the cricket and football pitches would not accord with design guidance or meet the requirements of the clubs that will use the pitches.

Figure B14 Cricket square with adjacent non-turf cricket pitch (NTCP)

Notes: See Part A Figure A2 for pitch orientation criteria. All dimensions are in metres.



- **Football Pitches:** The Proposed Site Layout refers to both pitches being U11/U12 football pitches but from measuring off the plans they would appear to both be U13/U14 pitches which would be consistent with what is proposed in the Planning Statement. It is **requested** that the plan be corrected to provide clarity on this.
- **Cricket Practice Nets:** The ECB has **requested** that the 'Proposed Site Layout' indicates where cricket practice nets could be sited at a later date to future proof the design of the site if Saffron Walden Cricket Club (or another user) wished to provide nets on the site. Addition of this facility will have a positive, impact on practice and contribute to the ground being sustainable from a cricket perspective. An area of at least 30x7.3 metres should be allowed for this which should be sited beyond the minimum 3 metre run-off areas of the football and cricket pitches.
- **Changing Rooms:** The ECB has **requested** that the clubhouse floor plan and elevations be amended because there is a limited view of the field of play from the team changing rooms' windows. This can be modified to provide larger

windows with a full view of field of play whilst maintaining privacy. The ECB's Pavilions and Clubhouses (TS5) guidance provides further advice on this and example layouts.

- **Playing Field/Clubhouse Phasing and Delivery:** It is noted that Part 4 of the submitted Unilateral Undertaking proposes that the sports pitches and clubhouse be completed and ready for use prior to occupation of more than 80% of the Open Market Housing Units. Notwithstanding Sport England's position on the loss of the playing fields to residential, our policy approach to the delivery of playing field mitigation projects as set out in paragraph 61 of the above policy is that provision should be available for use prior to the implementation of any development affecting the existing area of playing field in order to secure continuity of use and certainty of re-provision. While a more flexible approach can be taken to the delivery of the playing field/clubhouse on this occasion because the playing fields are not currently in use, it was expected that the facilities would be delivered earlier than proposed as based on this proposal all or most of the dwellings are likely to be completed (although not necessarily occupied) before the playing fields/clubhouse are ready to use. It is therefore **requested** that Part 4 of the Unilateral Undertaking be reviewed to bring forward the completion of the sports pitches and clubhouse to an earlier stage in the project.

Sport England's Position

Given the above assessment, Sport England raises an **objection** to the application because in its current form it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 104 of the NPPF due to the loss of playing fields. However, the improvements that have been made to the design and layout of the retained playing fields are acknowledged although it is requested that the detailed matters set out above are considered and addressed in advance of the application being determined.

Options for addressing the objection to the loss of the playing fields are limited on this occasion due to the scale of the loss of playing fields. The only clear option would be for the applicant to make direct replacement playing field provision off-site in accordance with exception 4 of our policy e.g. an existing playing field in Saffron Walden could be extended or a new playing field created to mitigate the impact but it is acknowledged that opportunities for this in the local area are known to be limited or non-existent hence the need to protect the site. Any on-site mitigation solution would need a much larger proportion of the playing fields to be reinstated and would need to be combined with a financial contribution being secured towards the delivery of off-site playing field mitigation projects in order to mitigate any residual loss of playing fields. However, this would either require a new planning application or major amendments to the current application. I would be happy to discuss such options with the applicant.

Without prejudice to the above position, if the Planning Inspectorate is minded to approve the application contrary to the above advice, it is **requested** that the following three planning conditions be imposed for the reasons set out below:

1. Playing Field Works Construction Specification and Implementation

Programme: While Sport England, the Football Foundation and the ECB support the recommendations in the submitted Sports Turf Consulting Feasibility Report for the reinstated playing fields, as set out in Executive Summary of the report, the feasibility study does not represent a detailed specification of works and would not be suitable as a basis for a construction contract. In order to ensure that the contractor that delivers the reinstated playing field works follows a specification which accords with the feasibility study report recommendations, a planning condition will need to make provision for a contractor's specification including an implementation programme to be submitted and approved so that it can be checked by the local planning authority and Sport England with respect to whether the detailed proposals accord in practice with the advice set out in the feasibility report. Sport England would expect the submitted specification to make provision for an independent agronomist (such as Sports Turf Consulting) to assess the works following their completion and for any issues identified by the sports turf consultant to be rectified prior to handover of the pitches to the management body. It is therefore requested that a planning condition along the following lines is imposed on any planning permission:

"Prior to commencement of the reinstated playing field works a contractor's specification for the detailed design of the playing fields prepared in accordance with the approved 'A Preliminary Feasibility Report Concerning Surface Assessment at Former Friends School Field Open Space and Preliminary Feasibility Study for Ground Improvement (prepared by Sports Turf Consulting), dated 24th April 2025' which includes an implementation programme, shall be submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. The reinstated playing field works shall be implemented in accordance with the approved specification and implementation programme.

Reason: To ensure the satisfactory quality of reinstated playing field provision and to ensure that the reinstated playing field is prepared to an adequate standard and is fit for purpose and to accord with Development Plan Policy.

2. Non-Turf Cricket Pitch Design Specification: Details of the supplier's specification for the proposed NTCP (Non-Turf Cricket Pitch) needs to be submitted and approved. This is justified to ensure that the NTCP is fit for purpose and meets the ECB's performance and safety requirements in practice. Without these details being considered there is a risk that the NTCP will not be fit for purpose and may be unsafe. The following planning condition is requested which is based on model condition 9a of our model conditions

schedule https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy:

“Prior to commencement of the reinstated playing field works, details of the suppliers specification of the non-turf cricket pitch shall be submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. The non-turf cricket pitch shall be constructed in accordance with the approved details prior to first occupation of the relocated playing field.

Reason: To ensure the satisfactory quality of reinstated playing field provision and to ensure that the non-turf cricket pitch is prepared to an adequate standard and is fit for purpose and to accord with Development Plan Policy

An associated informative should refer to the facility complying with the England & Wales Cricket Board’s TS6 document on Performance Standards for Non-Turf Cricket Pitches Intended for Outdoor Use and for the system installed to be an ECB approved non turf system – see <https://www.ecb.co.uk/news/74645/cricket-surface-types> for further details of the ECB TS6 document and approved non-turf systems.

3. Ball Strike Mitigation Design, Operation and Maintenance Details: While the proposals in the submitted Cricket Ball Strike Assessment prepared by Labosport for addressing ball strike risk are acceptable in principle, at this stage details of the fencing/netting design specification, the operational arrangements for erecting and dismantling any demountable netting and the fencing/netting maintenance arrangements are not available. This information is required to ensure that the fencing/netting that is installed is fit for purpose in practice, any demountable netting is in place during the cricket season and to ensure that the fencing/netting is suitably maintained over a long term period to help ensure that it remains effective for addressing ball strike in practice. Without this, there would be a potential ball strike risk to the adjoining residential developments which in turn may prejudice the use of the site for cricket. It is requested that a condition along the following lines be imposed to address this (which is based on condition 22 of our model conditions schedule):

“Prior to commencement of the reinstated playing field works, details of the design and specification, the operational arrangements and the maintenance arrangements of the ball stop fencing or netting shall be submitted to and approved in writing by the Local Planning Authority, [after consultation with Sport England]. The approved fencing or netting specification shall be installed in full prior to first use of the reinstated playing field and thereafter be operated and maintained in accordance with the approved details.

Reason: To provide protection for the occupants of adjacent uses and their property from potential ball strike from the playing field and to accord with Development Plan policy.

If you would like any further information or advice, please contact the undersigned

Yours sincerely,

Roy Warren
Planning Manager

A black rectangular redaction box covering the signature of Roy Warren.

The Five Exceptions to Sport England's Playing Fields Policy

Exception 1

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.

Exception 4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

Exception 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

The full 'Playing Fields Policy and Guidance Document' is available to view at:

www.sportengland.org/playingfieldspolicy

Annex 2 – Former Friends School Playing Fields 2006 (Google Earth Pro)



Annex 3 – Former Friends School Playing Fields 2009 (Google Earth Pro)

