

North Hertfordshire District Council

By email only

Date: 18<sup>th</sup> August 2025

FAO Alex Howard

**Town & Country Planning (Development Management Procedure) (England)  
Order 2015**

**Application Reference:** 25/01830/FP

**Site:** Highfield School, Highfield, Letchworth Garden City, Hertfordshire, SG6 3QA

**Proposal:** Creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, floodlights and an access footpath

**Sport England Reference:** PA/25/E/NH/71392

Thank you for consulting Sport England on the above application.

**Summary**

Statutory consultee role

Sport England raises **no objection** to this application as a statutory consultee which is considered to meet exception 5 of our adopted Playing Fields Policy and paragraph 104 of the NPPF **subject** to two planning conditions being imposed relating to the following matters as set out in this response:

- Artificial Grass Pitch Certification
- Community Use Agreement

Non-statutory consultee role

The principle of the development is supported as a non-statutory consultee and advisory comments are made on technical issues such as hours of use, sports lighting and noise.

**Sport England – Statutory consultee role and policy**

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 104, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document':

[www.sportengland.org/playingfieldspolicy](http://www.sportengland.org/playingfieldspolicy)

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

- all or any part of a playing field, or
- land which has been used as a playing field land 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. A summary of the exceptions is provided in the annex to this response.

### **The Proposal and its Impact on the playing field**

In summary, the development involves a floodlit 3G artificial grass pitch (AGP) that would be sited on part of Highfield School site that would comprise 2 x 43 x 33 metre areas that could be marked out for two 5v5 mini football pitches and four informal small sided pitches. The two areas would be divided by a hard surfaced spectator space. The application would also include a storage container for maintenance equipment, goal storage areas and an access footpath.

### **Assessment against Sport England's Playing Fields Policy and NPPF**

As the proposal relates to the provision of an enhanced outdoor sports facility on the existing playing field it can be considered against exception 5 of the above policy (see Annex to this response). I have therefore assessed the proposal against the above policy to determine whether the proposals meet exception 5.

#### *Sports Development Benefits*

In summary, the key potential sports development benefits are considered to be as follows:

- The proposed floodlit AGP would provide a modern all weather surface that would be capable of intensive use throughout the year for 5v5 mini football matches, training and coaching. The design and layout of the AGP would accord with the Football Association's design guidance which will help ensure that a fit for purpose facility that is suitable for meeting school and community needs will be implemented in practice.
- In relation to benefits for the Highfield School, the AGP would provide an all weather pitch facility that could be used for meeting the school's curricular and extra-curricular PE and sport needs and offer continuity of facility provision when the school's natural turf pitches are unavailable due to adverse weather or ground conditions.
- In relation to community benefits, the facility would be made available for community use outside of school hours. The emerging North Hertfordshire

District Council Playing Pitch Strategy which is now at an advanced stage of preparation has assessed 3G AGP needs across the district and has identified a current need for an additional 4 full size 3G AGPs in total, of which 0.5 AGPs would be in the Central analysis area of the district which is focused on Letchworth and Baldock where the application site is located. The Football Foundation's new North Hertfordshire Local Football Facilities Plan (2025) <https://localplans.footballfoundation.org.uk/local-authorities-index/north-hertfordshire/north-hertfordshire-local-football-facility-plan-2025/> which has been informed by the emerging Playing Pitch Strategy findings has also identified a need for 4 additional full size 3G AGPs in the district including one in Letchworth.

While both the Playing Pitch Strategy and Local Football Facilities Plan focus on identifying needs for full size 11v11 3G AGPs as these facilities offer the capacity and flexibility to meet match play needs across all formats of football, small sided AGPs such as the one proposed still have a role to play in contributing towards meeting these needs because they are suitable for casual community use (e.g. 5-a-side matches played by groups that are not part of FA affiliated clubs) as well as meeting small sided match play and training demand for FA affiliated community football clubs.

I have consulted the Football Foundation (who represent the FA and the Hertfordshire FA) who have advised that the emerging Playing Pitch Strategy, due to its advanced stage, should be used for assessing the strategic need for this proposal. The design of the AGP is considered to be fully compliant with the FA's design guidance <https://www.thefa.com/get-involved/player/facility-development-and-technical-guidance> including the pitch dimensions, fencing, drainage, spectator standing, infill retention and sports lighting scheme. The reference in the Design & Access Statement to preparing a community use agreement is welcomed by the Football Foundation as this will be necessary to secure appropriate community use of the facility in practice over a long term period.

The Hertfordshire FA has advised that AGPs designed for small sided football would likely to attract a different user group to the traditional FA affiliated game like a full size 11v11 AGP would but that it would contribute the equivalent of 0.25 of a full size 11v11 AGP in terms of meeting demands and maybe up to 0.5. Both the Football Foundation and the Hertfordshire FA raise no objection to the application.

Therefore, the proposal will make a contribution to meeting identified community needs for 3G AGP provision across the district and specifically in the Central analysis area of the district where the site is located. Due to the Highfield School's location in close proximity to Hitchin it may also

contribute to helping meet identified needs (2.5 full size AGPs) in the neighbouring West analysis area of the district that is focused on Hitchin.

### *Impact on Playing Field*

In relation to the impact on the playing field, the AGP would be sited on a small self-contained area of the school's playing field adjoining the sports hall. Aerial photographs indicates that this area has not had playing pitches marked out on it in recent years. Due to the limited size of the area, space would only exist for marking out a limited range of playing pitches in practice such as mini football pitches and rounders pitches. Highfield School's playing pitch provision is focused on the school's main body of playing fields to the west of Briar Patch Lane which would not be affected by the proposals. The Council's emerging Playing Pitch Strategy has audited the school's playing fields and confirmed that there is no existing community use of the playing fields. The proposed site is considered to be suitable for an AGP due to the need for intensively used sports facilities such as AGPs to be located in close proximity to the ancillary facilities that support them such as changing and toilets. The AGP would also be expected to reduce pressure on the capacity of the school's natural turf pitches as activities such as training and small sided matches would be expected to be transferred to the AGP.

### **Sport England's Position**

Given the above, Sport England raises **no objection** to the application because it is considered to accord with exception 5 of our Playing Fields Policy and paragraph 104 of the NPPF. This position is strictly **subject to the following conditions** being attached to the decision notice should the local planning authority be minded to approve the application:

- **Artificial Grass Pitch Certification:** A condition requiring the submission and approval by the local planning authority (in consultation with Sport England) of certification that the artificial grass pitch has met the FIFA Quality accreditation or equivalent International Artificial Turf Standard (IATS) requirements prior to first use of the artificial grass pitch. This is justified because AGPs can only be sanctioned for FA affiliated community football match use where the pitch has been tested to meet these requirements. Further details of the FIFA standard is on FIFA's website at <https://www.fifa.com/technical/football-technology/standards/footballs/fifa-quality-marks-explained>. As a pitch can only be tested for certification when it is completed it would not be possible to request the information to be provided at planning application or pre-commencement stages. Following meeting the tests, the facility will need to be registered on the Football Foundation's Register of Football Turf Pitches <https://footballfoundation.org.uk/3g-pitch-register> to enable it to be sanctioned for FA affiliated community football match use. The Design and Access Statement has confirmed that the AGP will be designed to meet the FIFA Quality accreditation. It is requested that the following condition

and informative be imposed (which is based on condition 9b of our model conditions schedule [https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=playing\\_fields\\_policy](https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=playing_fields_policy) :

*“Use of the artificial grass pitch shall not commence until:*

*(a) certification that the Artificial Grass Pitch hereby permitted has met the FIFA Quality accreditation or equivalent International Artificial Turf Standard (IATS); and*

*(b) confirmation that the facility has been registered on the Football Foundation’s Register of Football Turf Pitches;*

*have been submitted to and approved in writing by the Local Planning Authority.*

*Reason: To ensure the development is fit for purpose and sustainable, provides sporting benefits and to accord with Development Plan Policy \*\*.*

*Informative. The applicant is advised that the pitch should be tested every three years by an accredited testing laboratory in order to achieve and maintain FIFA Quality accreditation.*

- Community Use Agreement: A condition requiring a community use agreement for the AGP to be submitted and approved by the local planning authority (in consultation with Sport England) prior to first occupation of the artificial grass pitch in order to ensure that community access to the facility is secured in practice. A community use agreement sets out a school’s policy and arrangements for community use of its sports facilities and covers matters such as hours of use, types of bookings accepted, restrictions on community use etc. The agreement is usually between a sports club and the relevant local authority (i.e. North Hertfordshire District Council) but other bodies can be parties such as sports governing bodies. Sport England regularly secures the completion of such agreements through planning conditions on planning permissions for sports club developments. Such a condition is justified to avoid a scenario where community access to the facility does not take place (or is significantly restricted) following the implementation of the proposed development and to ensure that the wider community use arrangements are safe and well managed. Without suitable community access being secured over a long term period in practice, one of the principal sports development benefits of the proposals (local community need) which mitigates the impact of the development on the playing field would not be realised. A community use agreement also provides clarity and formalisation with respect to community access arrangements for all parties. Community use agreement templates, examples of completed agreements and further advice can be provided upon request although advice should be sought from North Hertfordshire District Council, the Hertfordshire FA and Sport England before an agreement is prepared. The following condition is requested to be imposed to address this which is based on model condition 16 of our conditions schedule:

*“No occupation shall commence of the artificial grass pitch hereby permitted until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the artificial grass pitch and supporting ancillary changing and parking facilities and include details of pricing policy, hours of use, access by community users, management responsibilities and a mechanism for review, and anything else which the Local Planning Authority in consultation with Sport England considers necessary in order to secure the effective community use of the facilities. The development shall not be used at any time other than in strict compliance with the approved agreement.*

*Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy”*

If the LPA is minded to approve the application without imposing the above conditions then Sport England objects to the application as it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 104 of the NPPF.

If you wish to amend the wording of the conditions or use another mechanism in lieu of the conditions, please contact us to discuss. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

### **Sport England – Non Statutory Role and Policy**

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

This application falls within the scope of the above guidance as it relates to development which creates opportunities for sport. Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England’s planning objectives are to PROTECT existing facilities, ENHANCE the quality, accessibility and management of existing facilities, and to PROVIDE new facilities to meet demand. Further advice is provided in Sport England’s Planning for Sport guidance which can be found here: <https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-for-sport-guidance/>.

As a non-statutory consultee, without prejudice to our position as a statutory consultee set out above, Sport England would wish to make advisory comments

on the following matters:

### Principle of the Development

Principles 6 and 7 of Sport England's Planning for Sport guidance relate to the 'Enhance' objective and in summary support improvements to existing sports provision where they are needed (principle 6) and encourage/secure wider community use of existing and new sports provision (principle 7). The proposed development would provide a sports facility that would offer potential to make a contribution towards meeting identified community sports facility needs in the North Hertfordshire area for the reasons set out above. The proposals are therefore considered to meet principles 6 and 7 of the guidance. Sport England would therefore wish to confirm its **support** for the principle of the proposed development as a non-statutory consultee.

### Hours of Use and Sports Lighting

The proposal for the AGP to include new sports lighting is welcomed and considered essential as this will provide a modern lighting system that is more energy efficient than the system that it will replace.

While Sport England would not require a planning condition to be imposed relating to the hours of use of the AGP or its sports lighting, it is acknowledged that the Council may wish to impose such a condition in order to address potential impact on residential amenity or the environment. If planning permission is granted, it is recommended that any condition that may be imposed by the Council relating to the hours of use of the lighting and the use of the AGP is not overly restrictive. In this regard, it is advised that peak community use of 3G AGPs on similar sites usually extends until 10.00 p.m. on weekday evenings. It is noted that the application is seeking use of the AGP and its floodlights until only 8.00pm on weekday evenings in the winter period which only covers part of the peak community use period in order to minimise the impact on bats. If the Council wishes to impose a planning condition restricting the hours of use of the AGP or its sports lighting, consideration should be given to using condition 14 from our model conditions schedule.

If the design of the lighting scheme is material to the assessment of the planning application, I would recommend that consideration be given to Sport England's 'Artificial Sports Lighting' guidance note <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/artificial-lighting> and the FA's Guide to 3G Football Turf Pitch Design and Layouts <https://www.thefa.com/get-involved/player/facility-development-and-technical-guidance>.

## Noise

If noise generated from the use of the AGP is an issue in the determination of the planning application, Sport England has published a guidance note on the planning implications of AGP acoustics. This is intended to aid in developing a more consistent approach when assessing the noise associated with AGP use and to provide some rules of thumb when assessing noise impact. If applicable, it is recommended that this guidance is considered to inform any assessment of noise impact as it has been tailored to assist with the consideration of this issue. This can be downloaded from our website at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces>.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

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

Yours sincerely,

Roy Warren  
Planning Manager

E: [roy.warren@sportengland.org](mailto:roy.warren@sportengland.org)  
T: 07769 741137

### **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](http://www.sportengland.org/playingfieldspolicy)