

DELEGATED FILE NOTE

CASE OFFICER: ...Alex Howard.....

APPLICATION REFERENCE	BRIEF DESCRIPTION OF DEVELOPMENT	APPLICATION SITE
25/01830/FP	Creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, and an access footpath (as amended by plans and information received 8th and 23rd December 2025 and 6th January 2026).	Highfield School Highfield Letchworth Garden City Hertfordshire SG6 3QA

Submitted Plan Nos

SSL3394 01 SSL3394 02 SSL3394 07 SSL3394 08 SSL3394 09 SSL3394 03 REV01 SSL3394 04 REV01
SSL3394 05 REV01

1.0 Policies

SP1	Sustainable development in North Herts
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SP5	Countryside and Green Belt
SP6	Sustainable transport
SP9	Design and Sustainability
SP11	Natural resources and sustainability
SP11	Natural resources and sustainability
SP12	Green infrastructure, landscape and biod
T1	Assessment of transport matters
T2	Parking
D1	Sustainable design
D3	Protecting living conditions
NE4	Biodiversity and geological sites
HE1	Designated heritage assets
SECN8	Promoting healthy and safe communities
SECN9	Promoting sustainable transport

SECN11	Making effective use of land
SECN12	Achieving well-designed places
SECN14	Meeting climate change,coastal,flooding
SECN16	Conserve + enhance historic environment

1.0 **Site History**

- 1.1 Extensive site history here largely relating to the redevelopment of the school under ref: **13/02867/1**.

2.0 **Policies**

2.1 **North Hertfordshire District Local Plan (The Local Plan) 2011 – 2031**

Policy SP1: Sustainable Development in North Hertfordshire
 Policy SP5: Countryside and Green Belt
 Policy SP6: Sustainable Transport
 Policy SP9: Design and Sustainability
 Policy SP11: Natural Resources and Sustainability
 Policy SP12: Green Infrastructure, Landscape and Biodiversity
 Policy SP13: Historic Environment
 Policy T1: Assessment of Transport Matters
 Policy T2: Parking
 Policy D1: Sustainable Design
 Policy D3: Protecting Living Conditions
 Policy HC1: Community facilities
 Policy NE4: Biodiversity and geological sites
 Policy NE6: New and improved open space
 Policy HE1: Designated Heritage Assets

2.2 **National Planning Policy Framework (NPPF) (December 2024)**

Section 2: Achieving sustainable development
 Section 4: Decision making
 Section 8: Promoting healthy and safe communities
 Section 9: Promoting sustainable transport
 Section 11: Making effective use of land
 Section 12: Achieving well-designed places
 Section 14: Meeting the challenge of climate change, flooding, and coastal change

Section 16: Conserving and enhancing the historic environment

2.3 **Vehicle Parking at New Development SPD**

3.0 **Representations**

3.1 **Site Notice and Neighbour Consultation** – A total of 106 representations have been received, 47 of which are objecting and 59 are supporting, raising the following matters (summary):

Objections:

- Traffic, highway safety, parking. Highfield already suffers severe congestion at school peak times and emergency vehicle access is already compromised. There is a lack of on-site parking for after-hours/weekend use and traffic, and parking issues would become daily rather than twice a day, with many nearby residents experiencing gridlock, pavement mounting, and blocked drives.
- Noise from sports activity, car doors and spectators. Concerns over additional shouting, whistles, ball impacts on the fencing. Noise until 8–8.15pm considered unacceptable, with this made worse by noise in summer with windows are open. Concerns about bad language and impact on children.
- Light pollution. 11m floodlights (in original scheme) considered intrusive and the glow would be visible from bedrooms, gardens, etc. This would be worse in Winter evenings.
- Commercialisation. Consider that this is not a school facility but a commercial leisure centre. Operating 365 days a year until evening represents a different land use. They cite the school's existing conditions (sports hall previously restricted from public use). Lettings income is framed as a driving purpose, not education
- Environmental concerns. Mention of microplastics from rubber crumb where they are apparent EU restrictions / future UK potential bans. Concern over loss of green space, impact on wildlife (bats, deer, foxes, birds), as well as hardstanding and drainage concerns.
- Lack of consultation and documentation concerns. There has been poor communication from school and residents have not been notified of this proposal. The submission includes confusing / contradictory documents. Concern over the timing of consultation in summer holiday period when residents are away. Request for combined/coherent operational hours schedule and documents.
- Amenity impact / residential character. Concern over loss of quiet enjoyment of gardens with year-round noise and activity. Considered incompatible with “Garden City ethos”. Fear of antisocial behaviour.

Supporters:

- Benefits to pupils. That the 3G surface will provide reliable, all-weather PE space, solve the current problem of waterlogged grass, improve curriculum delivery, support extracurricular sport, and expand space at break/lunchtime
- Physical and mental wellbeing. The scheme will support improved physical health/mental wellbeing benefits. There is a need for structured activities to reduce anti-social behaviour.
- Community benefit / grassroots sport. There has been a lot of support from Letchworth Eagles parents/coaches, Highfield School staff and local sports volunteers. These comments site a shortage of 3G facilities locally and a demand

exceeding supply in Letchworth vs Hitchin/Baldock. This will improve opportunities for children of all abilities

- Use of currently unusable land. The land is waterlogged and effectively unusable, such that the 3G proposal makes productive use of an otherwise wasted area.
- Minimal impact on neighbours. Of those supporters, which are noted to be mostly parents and staff of the school, they take the view that the use is primarily during school hours, there are no floodlights in the amended scheme, Saturday use is limited, and that traffic will not exceed existing school day levels

3.2 **Hertfordshire Highways** – Provided several formal responses in August, October and December 2025 raising some concerns and requesting additional information to be submitted, before issuing final comments in February 2026 stating no objections subject to a number of informatives. The Highway Officer also confirmed that the previous request for a Travel Plan to be secured as part of a S106 agreement is no longer required.

3.3 **Environmental Health (Air Quality/Land Contamination/Environmental Health (Noise))** – No objection to the proposal subject to conditions securing the submission and implementation of a Noise Management Plan prior to use, and no objection to the conclusions of the lighting assessment subject to a condition that any lighting should be installed in accordance with the Institute of Lighting Professionals guidance. Recommended informatives.

3.4 **North Herts Waste and Recycling** – None received.

3.5 **North Hertfordshire Ecology** - No objection subject to conditions including the mandatory 10% BNG.

3.6 **Sport England** – No objection subject to two conditions covering certification for the artificial grass and a community use agreement.

3.7 **Officer Note:**

This application was originally called in to Planning Control Committee by the Local Ward Councillor should officers be minded to recommend it for approval. However, following further correspondence with the Local Ward Councillor and officers, the original call in request was withdrawn such that the application can be determined under delegated powers. Against the Council's Constitution, this application is not required to be determined by the Planning Control Committee.

4.0 **Planning Considerations**

4.1 **Site and Surroundings**

4.1.1 The application site is a flat, open, grassed playing field area located in the southern part of The Highfield School, Letchworth. The site includes a dry pond to the east close to the boundary. To the north of the site is the Highfield School building, a smaller area of open grass field, a hardstanding external area and hardstanding sports courts, as well as a parking area and access road leading to the main vehicular access onto Highfield. To the west of the site is Briar Patch Lane, a narrow road leading to other buildings, and a wider open field that borders Hitchin Road. To the south and east of the site are a number of residential properties that share a boundary with the school, many of which are rear boundaries with the exception of Spiggie, which shares its side boundary. The field is bounded by close boarded fencing and dense landscaping on its

south, east and west sides. The field in question is on a slightly raised ground level compared to the rest of the school grounds,

- 4.1.2 The site is within the Green Belt and Highfield School is immediately adjacent to the Letchworth Conservation Area on its southern boundary.

4.2 **Proposal**

- 4.2.1 Full planning permission is sought for the creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, and an access footpath (as amended by plans and information received 8th and 23rd December 2025 and 6th January 2026).

4.3 **Key Issues**

- 4.3.1 The key issues for consideration are the
- The Principle of Development in the Green Belt
 - Sports Facility Provision
 - Layout, Design, and the Impact on the Character of the Area
 - Impact on Neighbouring Properties
 - The Impact on Designated Heritage Assets
 - Highways, Access, and Parking
 - Ecology
 - Surface Water Drainage/Flooding
 - Waste and Recycling
 - Environmental Health
 - Climate Change/Sustainability
 - Other Matters
 - Planning Balance

The Principle of Development in the Green Belt

- 4.3.2 The site is within the Green Belt. Policy SP5 of the Local Plan covers the Countryside and Green Belt, where support is given to developments that are not inappropriate development or where Very Special Circumstances can be demonstrated. Section 13 of the NPPF advises on such instances where development is considered in the Green Belt.
- 4.3.3 NPPF paragraph 142 confirms the great importance that the Government attaches to Green Belts and that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence

Paragraph 143 identifies the five purposes of Green Bet as:

- (a) To check unrestricted sprawl of large built-up areas;
- (b) To prevent neighbouring towns merging into one another;
- (c) To assist in safeguarding the countryside from encroachment;
- (d) To preserve the setting and special character of historic towns; and
- (e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 153 of the NPPF sets out that *“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by*

definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

Paragraph 154 of the NPPF sets out instances where development in the Green Belt is not inappropriate, which are as follows:

"a) buildings for agriculture and forestry;

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

e) limited infilling in villages;

f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

i. mineral extraction;

ii. engineering operations;

iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;

iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;

v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order."

- 4.3.4 In this instance, the proposal is for the creation of a 3G Multi Use Games Arena (MUGA) to accommodate 2 pitches with artificial turf, with associated perimeter fencing, hardstanding areas, a storage container and access footpath, for the existing Highfield School. The proposal is primarily for the use of the school during school hours and term times, but there will be some community use available outside of these times and subject to the agreed hours of operation. As such, the proposal would fall to be considered as the provision of appropriate facilities for outdoor sport/recreation in connection with the existing use of the land, as per Paragraph 154b of the NPPF. Therefore, this requires further consideration as to whether the proposal would preserve the openness of the Green Belt and whether it would conflict with the purposes of including land within it.

- 4.3.5 As per paragraph 142 of the NPPF, openness is the fundamental characteristic of the Green Belt and is defined as the absence of built development and intended to prevent urban sprawl. It comprises both spatial (volume/scale) and visual (visibility) aspects, which has been supported in case law and appeal decisions.
- 4.3.6 The proposed MUGA would measure approx. 74m in length and 44m in width, with the associated small-sided pitches and hardstanding access routes all at ground level. Within the enclosure are two lengths of 1.2m fencing for spectators and pitch demarcation either side of the central access, which is then further supported by a modest length of 2.0m fencing in the middle of the central access. There would be 3.0m fencing around the entire perimeter of the proposed MUGA.. All of this proposed fencing would be open mesh sports fencing in a dark green (RAL 6005), a colour commonly used for sports facilities. On the southern side of the MUGA would also be a 3.0m high acoustic fence, spanning approx. 74m in length, finished in a light wooden colour. In the north-eastern corner of the site, a single storage container is proposed, approx. 6.0m long and 2.5m wide, and 2.6m in height finished in dark green.
- 4.3.7 In terms of spatial openness, there is an acknowledgement that the development would result in some harm. Indeed, the site is presently an open field covered in grass, which would change as a result of the proposal to incorporate a more formal play area with associated boundary treatments. The MUGA would cover the majority of the field, but the development is not considered to have a volume per say. This is because the pitches and pedestrian access routes would be at ground level, and the fencing at varying heights will enclose the relevant areas where appropriate; there is no roof and the physical experience of the proposal is through the tallest boundary fencing at 3.0m in height, which is mostly open mesh sports fencing in a dark green which can be seen through. Therefore, whilst Officers accept that the development would have some impact on spatial openness, it is considered that this impact would be modest given the nature of the proposal and its location.
- 4.3.8 For visual openness, this is the more relevant matter as it has regard to the visibility of the development. In this case, the site is relatively well enclosed on all sides, with the main two-storey school building to the north, dense landscaping to the east and some further, but not as dense, landscaping to the south and west. This is of course seasonal but the reality here is that the MUGA, which would be surrounded by 3.0m tall fencing and would incorporate a 3.0m acoustic fence on its south side, will be a noticeable change in this part of the Green Belt and will have an impact on visual openness as a result. However, the pitch enclosure will be largely formed using open mesh sports fencing which maintains visual sightlines and allow views through the development, a common practise for MUGAs. The fencing will be finished in dark green (RAL 6005), which is a colour commonly used for sports facilities due to its ability to blend with surrounding vegetation and reduce visual prominence within the landscape. As well as the fencing, the surface will be coloured grass green to replicate the appearance of natural turf and seek to maintain visual continuity with the surrounding playing fields. As part of negotiations on this application, the previously sought 11.0m tall floodlights have been omitted from the proposal, as well as the previously proposed 4.5m perimeter fencing/4.0m acoustic fencing has also been reduced to 3.0m overall. In this context, whilst Officers note that the development will result in some harm to visual openness, it is considered that this impact would be moderate given the design/scale of the proposal and its associated enclosure on all sides.
- 4.3.9 In terms of the five purposes of the Green Belt as set out in paragraph 153 of the NPPF, the proposed development would not conflict with any of those purposes.

- 4.3.10 As such, it is considered that the proposed development would constitute the provision of appropriate facilities for outdoor sport/recreation in connection with the existing use of the land, as per Paragraph 154b of the NPPF. This report has assessed the proposal against the openness and the purposes of the Green Belt, concluding that the development would preserve the openness of the Green Belt and it would not conflict with the purposes of including land within it. The proposal is therefore considered in accordance with paragraph 154b of the NPPF and is not inappropriate development in the Green Belt.
- 4.3.11 The proposal would accord with Policy SP5 of the Local Plan and Section 13 of the NPPF.

Sports Facility Provision

- 4.3.12 Local Plan Policy HC1 encourages new community facilities provided they are:
- a) Appropriate in scale having regard to their local context
 - b) accessible by a range of transport modes
 - c) would meet an identified need in the local community.

In addition Local plan Policy NE6 encourages new and improved open space, which includes outdoor sports facilities including schools.

Paragraph 96c of the NPPF states that *“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which*

enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling”.

- 4.3.13 The proposal would deliver a development that would formalise the play space on offer to the pupils of Highfield School, as well as some additional community use as well, which is inherently supported by the NPPF. The proposal would promote good health and well-being and support healthy lives, as per the requirements of paragraph 96 of the NPPF.
- 4.3.14 Sport England have been consulted on this application, as they are a statutory consultee for developments such as this. They have responded as follows:

“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”.

- 4.3.15 As such, in the light of policy support for such facilities and that of Sport England for the provision of this sports facility, which will directly benefit pupils of the school and the

wider community, the delivery of this proposal would be a benefit to which significant weight is attributed.

Layout, Design, and Impact on the Character of the Area

4.3.16 Policy D1 of the Local Plan states that planning permission will be granted provided that development responds positively to the site's local context in addition to other criteria. Policy SP9 of the Local Plan further considers that new development will be supported where it is well designed and located and responds positively to its local context. These considerations are echoed in Section 12 of the NPPF.

4.3.17 The proposed development is a MUGA, which is a relatively common feature in schools, comprising a pair of small pitches enclosed by fencing at various heights. The planning statement sets out that the MUGA has been designed to have minimal visual impact, ensuring it is sympathetic to its surroundings and does not affect the visual amenity of the area, in line with local policies. The choice of materials reflects the materiality and conformity of similar AGP installations, ensuring high performance and a high-quality, enduring appearance. These materials have been selected for the following reasons:

- High performance.
- High quality enduring appearance.
- Suitability within the local character.
- Durable and robust with low maintenance.
- Energy efficient and sustainable.

The design complements The Highfield School and the surrounding environment, ensuring minimal visual impact.

4.3.18 In this instance, the visual impact of the proposed MUGA has already been covered in the previous Green Belt section of this report, so this report does not go over these matters again. The proposal will be noticeable and have an impact on the character of the area, mainly due to the 3.0m high fencing. However, there aren't any means to improve its external appearance given the requirements of these facilities and the guidance from Sport England. In this case officers have negotiated to have the 11.0m tall floodlights omitted from the proposal, as well as the previously proposed 4.5m perimeter fencing/4.0m acoustic fencing has also been reduced to 3.0m overall. This is considered to be reasonable, leaving the applicants with a scheme that works for their needs whilst reducing the visual impact and the impact on neighbouring properties.

4.3.19 Therefore, the proposal would accord with Policies SP9 and D1 of the Local Plan and Section 12 of the NPPF.

Impact on Neighbouring Properties

4.3.20 Policy D3 of the Local Plan states that planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions.

4.3.21 It is noteworthy at this stage that the school and indeed the application site shares a boundary with a number of residential properties on Briar Patch Lane (Spiggie and Old Orchard), Hitchin Road (30-38), and Highfield (9-43). The field in question is part of the school and is already used as an area for sport and recreation for pupils, but the proposed MUGA will formalise this space for recreation. Several representations have been received from the immediate neighbours to this site, objecting to the proposal for a number of reasons including concerns over noise from sports activity, car doors and spectators. There are concerns over additional shouting, bad language, whistles, ball

impacts on the fencing, as well as all of this noise occurring until 8–8.15pm, which is considered unacceptable. This is also stated to be made worse in summer with windows being open more frequently. As a result, residents are concerned over loss of quiet enjoyment of gardens with year-round noise and activity, which they considered incompatible with “Garden City ethos”. There are also further issues raised with the 11.0m floodlighting and some fear of antisocial behaviour.

- 4.3.22 The proposed MUGA would be located approx. 31m from the eastern shared boundary with properties on Highfield and would then be approx. 70m from the closest property’s rear elevation. The gardens of properties on Highfield are very long and there is an existing dense line of landscaping on the shared eastern boundary of the site. The MUGA would be sited approx. 7.0m from the southern shared boundary and would be approx. 56m from the closest property’s rear elevation on Hitchin Road, where there is also landscaping that exists on this boundary. The MUGA would be sited approx. 10.0m from the side elevation of Spiggie, a bungalow that fronts Briar Patch Lane, where some landscaping on this shared boundary does also exist.
- 4.3.23 The comments and concerns raised by interested parties, primarily those residents that live close to Highfield School, have been taken fully into account by officers during the consideration of this application. Accordingly, the original proposal which sought the erection of 11.0m floodlights, 4.5m perimeter fencing and 4.0m acoustic fencing and hours of operation between 8am – 8pm on weekdays, 8am – 6pm on Saturdays, and 8am – 4pm on Sundays and Bank Holidays, has been amended through negotiations with the applicant and their agent. As already set out in this report, the floodlighting has been omitted from the proposal entirely, the perimeter fencing and acoustic fencing has been reduced to 3.0m in height overall, and the hours of operation have been agreed to be 8am to 5pm on weekdays (or daylight hours, whichever comes first due to there no longer being flood lights) and 9am - 1pm on Saturdays. There is no provision on Sundays or Bank Holidays. These hours of operation would largely cover the standard school day (8am – 3:30pm) with the remaining time (1 hour 30 mins during weekdays and Saturdays morning/early afternoon (4 hours) for community use. These hours of operation would run during half terms/school holidays for community uses, such as summer football camps for example.
- 4.3.24 In this instance, the use and operation of the proposed MUGA would be predominantly for the school during daytime hours, with some limited time after school and on Saturdays for community use. The school have stressed that the primary purpose of this scheme is for its pupils, not commercial use, and these hours of operation are considered to be a reasonable compromise to enable some limited community/commercial use that would not be detrimental to amenity. Indeed, in some cases in winter, the use of the MUGA will have to cease before 5pm due to the loss of daylight with no floodlighting included. These hours of operation, coupled with the omission of the floodlights and the reduction in the height of the boundary fencing, is considered to be sufficient to ensure that the development not result in significant harm to the living conditions of occupiers of neighbouring dwelling houses through noise and general disturbance. The proposal would not appear overbearing, cause loss of daylight/sunlight, cause loss of privacy to nearby residential properties. However, officers accept that there will be some impact on neighbouring properties amenity as a result of this proposal, from the formalisation of this informal area of play to a MUGA and the additional footfall this may bring for 90 minutes on weekdays and for 4 hours on Saturdays.
- 4.3.25 The impact of the proposal will likely be felt most by Spiggie, the bungalow in the south-west corner adjacent to the site. The 3.0m fencing will be visible from this property, as will other properties on Hitchin Road and Highfield, and perhaps the

associated noise impacts will be more severe for this neighbour than others given the shorter distance from the MUGA. However, the scheme has sought to include a 3.0m acoustic fence which will offset the noise impacts and, in any case, there is some existing landscaping on the shared boundary which will screen the acoustic fence from view to a suitable extent. Whilst there would be some impact on the amenity of this property for the reasons set out above, it is considered that such impacts would not be unacceptable in this instance.

- 4.3.26 As covered in more detail later in this report, the proposal has been supported by a Noise Assessment. This assessment includes the prediction of noise emission from the MUGA at the nearby noise-sensitive properties, based on noise level data from activities measured at existing MUGAs and by generating a noise model. To meet the guidelines set out by the World Health Organisation, for levels of “moderate community annoyance” set at 50db, the acoustic fence is proposed on the south of the site. The barrier is to be solid and have a surface density of at least 10 kg per square metre. With the inclusion of the barrier, the highest predicted noise levels in the nearest gardens are approximately 48 dB, which is below the WHO guidelines for moderate community annoyance. Several additional measures will also be implemented as part of the proposed development to reduce the noise impact, which includes the use of Neoprene Washers which are fitted to fence panel fixings to reduce rattle and vibration from ball impacts, minimizing noise emission, the playing lines are set a minimum of 3m from the pitch perimeter to limit ball impacts against the fencing, and a Noise Management Plan will be conditioned and implemented for community use, with booking terms and conditions addressing noise and behaviour (e.g. bad language). A draft has been provided as a separate document and the Councils EHO has confirmed that it is acceptable in principle and recommends a condition that it is completed, submitted and approved in writing by the LPA prior to the use of the development. Overall, these noise measures are considered suitable and reasonable to limit noise related impacts as much as possible, to make the development acceptable.

- 4.3.27 As such, the proposal would therefore accord with Policy D3 of the Local Plan.

The Impact on Designated Heritage Assets

- 4.3.28 Policy SP13 of the Local Plan states that *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the asset’s conservation and the management of its setting”*. This reflects paragraph 212 of the NPPF which stipulates that great weight should be given to the conservation of designated heritage assets, such as Listed Buildings and Conservation Areas. Policy HE1 of the Local Plan states that *“Planning permission for development proposals affecting Designated Heritage Assets or their setting will be granted where they: c) Will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development, including securing the asset’s optimum viable use”*. This is reinforced by paragraph 215 of the NPPF.
- 4.3.29 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA Act) requires that in the exercise of planning powers, in conservation areas *“special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”*. It does not address the setting of conservation areas. There are no listed buildings within close proximity to the site that would be impacted by this development.
- 4.3.30 Given that the site is not within the Conservation Area, it is only adjacent to it, and that the development will largely be screened from views within the Conservation Area by

existing built form and landscaping, it is considered that the development will not result in any harm on the character and appearance of the Letchworth Conservation Area.

- 4.3.31 This is in accordance with Policies SP13 and HE1 of the Local Plan and Section 16 of the NPPF.

Highways, Access, and Parking

- 4.3.32 Policy T1 of the Local Plan states that planning permission will be granted provided that development would not lead to highway safety problems or cause unacceptable impacts upon the highway network. Policy T2 of the Local Plan and the Council's Vehicle Parking at New Development SPD sets out that parking provision must have regard for the standards set out in said documents.
- 4.3.33 The proposed MUGA seeks to operate the existing one-way system off Highfield which leads to a two-way internal access road towards the main parking area to the west of the school behind the tennis/netball courts. From this parking area, users of the MUGA can walk to the facility directly. There are 124 spaces provided. The majority of use of this MUGA will be during school hours, so there will be no significant increase in comings and goings except from 3:30pm – 5pm on weekdays and 9am – 1 pm on Saturdays.
- 4.3.34 The County Council's Highway Authority have been consulted extensively on this application, providing four formal responses over the course of 8 months. The most recent formal response sets out that they have no objections to the proposal. Their response from December 2025 states as follows:

"We note that paragraph 5.2 of the TA has confirmed that the use of the site during the weekdays will be limited to The Highfield School only (08:00-17:00) and then by community groups between 09:00-13:00 on a Saturday. The school may let out the facility during half terms and holidays when the school is not occupied, however, the facility will not be available for use on Sundays or Bank Holidays"

The highway authority is content with above approach and this would not have significant impact on the local highway network.

Travel Plan:

The submitted revised Travel Plan (Dec-2025) seemed satisfactory. Para 4.6 has confirmed that

"The operator will ensure that an appropriate budget and time is made available to the TPC to both cover the delivery of the role, and the range of measures outlined within this Travel Plan. As required by HCC, this Travel Plan will be registered on the Modeshift STARS system once the development is approved and prior to its opening. The system will be used to update the council on the annual monitoring undertaken at the site. The Travel Plan Coordinator (or a qualified person acting on their behalf) will attend a virtual meeting with HCC to setup the site on Modeshift STARS. Does not currently meet HCC's approval criteria. The following omissions must be addressed"

- 4.3.35 A further response in February 2026 has confirmed that following further discussions with their Active Travel Team, the requirement for a formal Travel Plan obligation and associated monitoring fees can be omitted. Highways is satisfied to accept the developer's submitted Travel Plan in its current form. However, the developer will still be expected to undertake an annual internal review of the Travel Plan and to continue engaging with HCC's Active Travel Team through the Modeshift Travel Plan process.

This approach will ensure an appropriate and proportionate level of ongoing monitoring and oversight.

- 4.3.36 It is noteworthy that the majority of interested parties have raised concerns regarding traffic and parking, which based on the comments appear to be existing issues most notably felt on Highfield. These concerns are noted, however, in terms of parking and traffic generation, the submission sets out that there are 124 car parking spaces on site, the majority of which are located to the west of the tennis/netball courts and reached via an internal access road, with much fewer spaces located around the one-way system at the front of the school. There is a clear route from these parking spaces to the west of the tennis courts to the entrance to the MUGA. It is acknowledged that the comments from residents on Highfield state that there appears to be an existing issue with parking on the main road during school pick-ups and drop offs, but given that this proposal is primarily for the use of the school and its pupils during standard school times, with only limited use outside of this (3:30pm – 5pm/or dusk and 9am – 1pm Saturdays) in the majority, the additional traffic or parking are not seen as a significant issue. It would appear there is more than enough parking on site for possible users outside of school times and during half-term/school holidays, so there should be no need to park on Highfield at all. Whether possible future users do park on Highfield is another matter, but the officers cannot object to a scheme on the basis of what may happen if the proposal does provide enough spaces to cope on site. The Highway Authority in their most recent comments no longer object to the proposal so there is no highway basis to object. The highway and access proposals are therefore deemed acceptable.
- 4.3.37 In terms of parking, the 124 parking spaces is considered more than sufficient for the scale of development and this is a modest MUGA compared to other full size 11-a-side pitches, as this is largely for 5-a-side/junior small sides games. The Vehicle Parking Standards at New Development SPD requires 20 spaces per football pitch for outdoor sports pitches, so this exceeds this provision and would accord with Policy T2 of the Local Plan.
- 4.3.38 Overall, the proposal is considered in accordance with Policy T1 and T2 of the Local Plan.

Ecology

- 4.3.39 This application is supported by a Preliminary Ecological Appraisal 2024. The Council's Ecologist has reviewed the proposal and has no objection to the development subject to conditions, covering the mandatory 10% BNG, a Construction Environmental Management Plan (CEMP), and an external lighting compliance condition; albeit this is no longer required the flood lights have been omitted from the proposal.
- 4.3.40 The submission of details to approve these conditions will deliver measurable gains in biodiversity and ensure ecological matters are suitably addressed.
- 4.3.41 Overall, the proposal is acceptable and in accordance with Policy NE4 of the Local Plan and Section 15 of the NPPF.

Surface Water Drainage/Flooding

- 4.3.42 The site is located within Flood Zone 1. Following consultation with the Lead Local Flood Authority (LLFA), they have confirmed that this is a minor application, the LLFA are not statutory consultees, and the development appears to have surface water

ponding only, which means they will not be providing a formal response in this instance.

4.3.43 The application is supported by a Drainage Strategy which states as follows:

“The AGP will feature a permeable playing surface and granular sub-base, allowing surface water to infiltrate and be temporarily stored within the base construction. A network of perforated pipes beneath the sub-base will collect and convey runoff to the dry pond to the east of the site. Flow rates will be restricted to 1.0 l/s, calculated using the HR Wallingford method to reflect greenfield runoff conditions. The system has been designed to accommodate storm events up to the 1 in 100-year plus climate change allowance, ensuring flood risk is effectively mitigated. The drainage solution follows the surface water disposal hierarchy set out in Planning Practice Guidance”

4.3.44 In the absence of a formal response from the LLFA, the proposed drainage strategy is considered acceptable.

Environmental Health

4.3.45 Environmental Health have formally responded to this application stating no objections subject to conditions covering the submission of a Noise Management Plan prior to the use of the development, and informatives covering the construction phases and hours that construction should take place. The lighting conditions are no longer required given the omission of the floodlights.

Climate Change/Sustainability

4.3.46 The overarching purpose of the planning system is to contribute to achieving sustainable development, as stated in Section 2 of the NPPF. This is considered against the three objectives of sustainable development, the economic, social, and environmental objectives.

4.3.47 In terms of the economic objective, the proposed development would deliver considerable benefits through the creation of employment during the construction phase and the revenue that the school will benefit from when the MUGA is used by the community between 3:30 – 5 pm on weekdays and 9am – 1pm on Saturdays.

4.3.48 In terms of the social objective, the proposed development would deliver a new facility to support outdoor sport and recreation which would directly benefit the pupils at Highfield School, improving their health and well-being.

4.3.49 In terms of the environmental objective, the proposed development would ensure that a field which is understood to be of poor quality for recreation would be suitably formalised to be available at all times. This will arguably be an improvement on the ground conditions which is understood to be in this state from when the school was re-developed. The proposal would also be subject to ecology and BNG conditions to ensure there are suitable gains in this respect.

Other Matters

4.3.50 Officers consider that many of the points raised by the interested parties have been directly addressed in the body of the report. However, to ensure all points are considered, each matter will be addressed in turn below:

- *Traffic, highway safety, parking. Highfield already suffers severe congestion at school peak times and emergency vehicle access is already compromised. There is a lack of on-site parking for after-hours/weekend use and traffic, and parking issues would become daily rather than twice a day, with many nearby residents experiencing gridlock, pavement mounting, and blocked drives. This has been addressed in the body of the report.*
- *Noise from sports activity, car doors and spectators. Concerns over additional shouting, whistles, ball impacts on the fencing. Noise until 8–8.15pm considered unacceptable, with this made worse by noise in summer with windows are open. Concerns about bad language and impact on children. This has been addressed in the body of the report.*
- *Light pollution. 11m floodlights (in original scheme) considered intrusive and the glow would be visible from bedrooms, gardens, etc. This would be worse in Winter evenings. This has been addressed in the body of the report.*
- *Commercialisation. Consider that this is not a school facility but a commercial leisure centre. Operating 365 days a year until evening represents a different land use. They cite the school's existing conditions (sports hall previously restricted from public use). Lettings income is framed as a driving purpose, not education. There will be some commercial use of the site but the development is primarily for the use of school pupils, given the agreed hours of operation.*
- *Environmental concerns. Mention of microplastics from rubber crumb where they are apparent EU restrictions / future UK potential bans. Concern over loss of green space, impact on wildlife (bats, deer, foxes, birds), as well as hardstanding and drainage concerns. The use of microplastics is not a material planning consideration. The Council's Ecologist has assessed the PEA and has no objections subject to conditions. The drainage matters have been addressed in this report.*
- *Lack of consultation and documentation concerns. There has been poor communication from school and residents have not been notified of this proposal. The submission includes confusing / contradictory documents. Concern over the timing of consultation in summer holiday period when residents are away. Request for combined/coherent operational hours schedule and documents. There is no requirement in the planning system for an applicant to consult with neighbouring properties that might be impacted prior to submission. Indeed, sometimes this is good practice, but the only legal requirement is to consult neighbours on the application once submitted. The documents that have been submitted in support of the application are satisfactory to enable a full consideration of the proposal; the Council are unable to tell the applicant how to submit their supporting information. The number of revised documents is acknowledged but consideration should be given to those most recent documents in any event, which is what has been used to determine this application.*
- *Amenity impact / residential character. Concern over loss of quiet enjoyment of gardens with year-round noise and activity. Considered incompatible with "Garden City ethos". Fear of antisocial behaviour. This has been largely covered in the body of the report. Given the scale of development that is proposed, it is not considered that the proposal would be incompatible with the garden city ethos. This site is on the edge of Letchworth and outside the Conservation Area.*

Planning Balance and Conclusion

- 4.4.1 Overall, the proposal is considered to be in accordance with paragraph 154b of the NPPF and is not inappropriate development in the Green Belt. The delivery of this MUGA would formalise the play space on offer to the pupils of Highfield School, as well as some additional community use as well, which is inherently supported by the NPPF at paragraph 96. As such, the development is acceptable in principle.
- 4.4.2 Officers have considered the variety of concerns raised by interested parties over the course of this application and have negotiated amendments with the applicant, namely the omission of the floodlights, reducing the height of the perimeter/acoustic fencing, and limiting hours of operation to largely reflect the school day with some modest community use. Overall, this appears to be a reasonable balance between the needs of the school and allowing the nearby neighbours to have a suitable standard of amenity. Subject to conditions, the proposal is not considered to result in significant adverse harm on residential amenity and reasonable living conditions.
- 4.4.3 The design, layout and external appearance have been amended where appropriate, largely by reducing the fence height, but a MUGA is a MUGA and there aren't any means to improve its external appearance given the requirements of these facilities and the guidance from Sport England. The external appearance and scale of development, which is a relatively modest MUGA compared to other much larger 11-a-side schemes, is deemed appropriate.
- 4.4.4 The Highway Authority have no objections to the proposal and given the existing access arrangements and proposed parking provision to the west of the site, the concerns raised by interested parties should not be materially impacted by the proposal given the agreed hours of operation and the existing provision of parking spaces which far exceeds that required in the Council's Parking SPD.
- 4.4.5 All other technical and relevant matters have either been satisfactorily addressed or can be reserved by condition.
- 4.4.6 Overall, the identified benefits that would arise from the proposal would outweigh the limited harm that would arise from the revised proposal. Therefore, the proposal is considered acceptable in planning terms and compliant with the relevant local and national planning policies.

4.5 **Alternative Options**

- 4.5.1 N/A

4.6 **Pre-Commencement Conditions**

- 4.6.1 The applicant is in agreement to the proposed pre-commencement conditions.

4.7 **Climate Change Mitigation Measures**

- 4.7.1 N/A

5.0 **Recommendation**

- 5.1.1 That planning permission resolved to be **GRANTED** subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out wholly in accordance with the details specified in the application and supporting approved documents and plans listed above.

Reason: To ensure the development is carried out in accordance with details which form the basis of this grant of permission.

3. The use of the 3G Artificial Grass Pitch hereby permitted shall only take place between the following hours:
0800 hours and 1700 hours Monday - Friday,
0900 hours and 1300 hours on Saturdays,
and not at all on Sundays, Bank or Public Holidays.

Reason: In the interests of amenity and in accordance with Policy D3 of the North Hertfordshire Local Plan 2011 -2031.

4. No development shall take place (including ground works or vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity), as informed by recommendations made in the September 2024 Preliminary Ecological Appraisal, has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "buffer zones" both for species and sensitive habitats to be informed by up to date surveys.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements) to include a precautionary non-licensed method statement for GCN.
- d) The location and timing of sensitive works to harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure the protection, enhancement and management of biodiversity, and to comply with Policy NE4 of the North Hertfordshire Local Plan 2011 - 2031.

5. There shall be no floodlighting installed.

Reason: In the interests of the amenity of neighbours, in line with Policy D3 of the North Hertfordshire Local Plan 2011 - 2031.

6. 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 the aims of Policy NE6 of the North Hertfordshire Local Plan 2011-2031 .

7. 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 Policies HC1 and NE6 of the North Hertfordshire Local Plan 2011 -2031.

8. Prior to the development hereby permitted being brought into use a Noise Management Plan shall submitted to and approved in writing by the Local Planning Authority. Such a management plan shall identify measures to control noise emanating from the hereby permitted facility. Any identified measures shall be implemented in accordance with the approved plan at all times.

Reason: To protect the amenity of neighbouring residents in accordance with Policy D3 of the North Hertfordshire Local Plan 2011 - 2031.

9. The acoustic fencing hereby permitted shall be installed on site at the approved location prior to the use/operation of the MUGA and thereafter retained.

Reason: To protect the amenity of neighbouring properties, in line with Policy D3 of the North Hertfordshire Local Plan 2011 - 2031.

Biodiversity Net Gain

1. The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)" that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be North Hertfordshire District Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply

(<https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>).

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Proactive Statement:

Planning permission has been granted for this proposal. The Council acted proactively through positive engagement with the applicant during the determination process which led to improvements to the scheme. The Council has therefore acted proactively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Signed  Shaun Greaves Determining Officer	Development Management North Hertfordshire District Council Council Offices Gernon Road Letchworth Herts SG6 3JF
Date: 10 March 2026	