

Huntingdonshire District Council

FAO: Robbie Bratchell

By email only

13<sup>th</sup> February 2025

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

**Pre-application**

**Site: One Leisure St Ives**

**Pre-Application Proposal: Proposed 3G pitch**

**Sport England Reference: PA/25/E/HU/69778**

Thank you for seeking pre-application advice from Sport England on the above proposal.

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

It is considered that the draft proposal would affect playing field and that any formal planning application for development in the form set out would require statutory consultation with Sport England under the terms of the above Order. We have therefore assessed it 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 playing field**

Pre-application advice is sought for the installation of a 3G Artificial Grass Pitch (AGP) on part of the playing field comprising a cricket square and would consequently result in the loss of part of a playing field. The proposal would therefore need to meet one or more of Sport England's Playing Fields Policy and paragraph 104 of the NPPF.

## National Governing Bodies of Sports Comments

In developing proposals for a 3G AGP for football, Sport England engaged with the Football Foundation, which corresponds with Huntingdonshire FA. Given that the proposed site is situated on a playing field that features a cricket square, as seen on Google Earth, Sport England also sought input from the England Cricket Board. The feedback received from the national governing bodies was as follows:

### Football Foundation (FF)

*'The Huntingdonshire PPS identified a need for an additional 3G FTP in the St Ives / St Neots area given the high levels of unmet demand. Furthermore, the one Leisure St Ives facility is identified in the LFFP as a site which could be developed to meet this need.*

*The facility successfully operates an existing pitch which is highly utilised and is unable to meet the demand within the area, and therefore an additional provides an opportunity to address needs identified within both the PPS and LFFP.*

*The applicant has engaged with Hunts FA and the Football Foundation with a view to a future funding application, and therefore it is expected that detailed designs and specifications would be submitted at a later date to support a full application.*

*A full site development plan and programme of use will be developed alongside the technical plans, to ensure a full programme of activity to support social/recreational and affiliated/competitive activity.'*

### England and Wales Cricket Board (ECB)

*'Local cricket context provided courtesy of from Cricket East (Cricket Board that covers Beds & Hunts).*

*Pre-covid, there was regular use of the back pitch (which is the pitch to be lost as a result of the AGP), this included (among others) County Age Group boys and girls inc. T20 festival/matches (quite often 2 different county age group games against the same county were held at the same time).*

*Due to the two-pitch setup, youth club finals and a Midweek Business League were also played on the back pitch. Active Partnership: Living Sport held school/SEN events there, too.*

*It's unknown the precise context for One Leisure subsequently not maintaining the back pitch but, it doesn't look to have had that availability for use since c. 2019.*

*In terms of local clubs, St Ives CC merged with Warboys CC and St Ives still use the front pitch on Saturdays whilst Warboys do likewise a few miles away at their old ground, too. However, with Development, T20 and friendly adult XIs plus (mixed) teams at all age groups there is limited capacity for the club to grow on this amended pitch footprint.*

*A thought: the front pitch is large enough to accommodate two games of junior cricket at the same time – provided non-turf pitches were located optimally (one next to the square, the other on the opposite side of the outfield). The provision of two NTPs on-site would provide significant additional capacity for future growth of junior cricket (girls cricket especially, but also women's cricket, too). Likely cost would be c. £20k ex VAT.*

*I can foresee a scenario where ECB could be supportive of such on-site mitigation being provided in exchange for the permanent loss of a cricket square. However, this could only be confirmed following extensive consultation and engagement by ECB with Cricket East and the club.'*

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

As the proposal includes outdoor facilities for sport due consideration shall be given as to whether the provision of the facilities would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the area of playing field. Subject to the benefits to sport clearly outweighing the loss of playing field the proposal may meet exception 5 of Sport England's Playing Fields Policy and criteria c of paragraph 104 of the NPPF.

Paragraph 74 of Sport England's Playing Fields Policy advises that Sport England will assess the potential benefit of any new or extended sports facility by taking into account a number of considerations. Paragraph 74 then outlines as a guide what the benefits may be.

#### Local and/or strategic need

The Playing Pitch & Outdoor Sports Strategy was adopted in December 2022, so is considered an up to date evidence base.

The ECB advised the cricket square to the north of the proposed AGP has limited capacity for the club to grow. The pre-application site, forms part of One Leisure St Ives Outdoor centre, so falls within the ID 174 in the PPOSS and describes the cricket facilities on site as, 'One square of good quality which consist of 14 wickets. Ancillary provision of standard quality. Square has spare capacity of 39 MES per season. With actual spare capacity to accommodate further teams on Sundays and Midweek. Three lane fixed net facility of standard quality.'

The recommended actions for the cricket provision on site outlined within the PPOSS is to, *'Sustain square quality with appropriate levels of maintenance. Explore the opportunity to improve ancillary provision onsite. Look to improve or resurface fixed net facility when required.'*

The PPOSS recommends protecting the existing quantity of cricket squares. The cricket square in the southern part of the site was not identified in the Site ID. The PPOSS also considered the existing cricket square to the north of the proposed AGP, to have actual space capacity to accommodate additional match play demand on Sundays and during the week for midweek cricket. With that said, the playing field, which was previously used for cricket, would contribute towards the future demand of cricket and the ECB have advised that there is limited capacity on the existing cricket square to accommodate future growth. We therefore advise you seek to address the ECB's comments to mitigate the loss of the cricket square, in particular, the provision of non turf cricket pitches alongside the cricket square currently being used.

In terms of football, the PPOSS considers the capacity of grass football pitches in Huntingdonshire to sufficiently meet current demand for adult, youth 9v9 and mini 7v7 football activity, with insufficient capacity to cater for youth 11v11 and mini 5v5 football activity. Future demand is expected to put further pressure on the supply of pitches and consequently new shortfalls are expected to emerge on youth 9v9 pitches, whilst Mini 7v7 pitches would be played to capacity. The AGP should be designed to ensure it includes line markings for youth 11v11, youth 9v9, mini 7v7 and mini 5v5 in particular, to ensure it alleviates identified shortfalls, as recommended in the PPOSS.

The PPOSS also recommends to ensure that any new 3G pitches are constructed to meet FA/RFU recommended dimensions and quality performance standards to meet performance testing criteria; and to ensure all 3G providers have a sinking fund in place for long-term sustainability.

The PPOSS considers the LFFP for Huntingdonshire which advises that, *'As the LFFP does not identify pitches within either area there is a need to explore additional options for the development of 3G pitches in the St Neots and St Ives analysis areas.'* One of the sites identified was One Leisure St Ives Outdoor.

The FF and Norfolk FA fully support the delivery of this proposed project, which would help to meet the need of a significant strategic need within the locality, especially given the number of affiliated teams currently with no access to an AGP.

#### Fully secures sport-related benefits for the local community

The proposal would provide a new 3G AGP on site, resulting in the loss of playing field. Within a planning application you should set out what the sport-related

benefits for the local community are. This can be addressed either in a Planning Statement or Covering Letter.

### Complies with relevant Sport England and national governing bodies of sport design guidance

#### *Artificial Grass Pitch*

Detailed designs have not been submitted as part of the pre-application, and therefore comments cannot be provided at this stage. These would need to be fit for purpose and accord with any up to date relevant design guidance from the Football Foundation and Sport England. Notwithstanding the absence of plans, the FF have advised you are discussing the proposals with them and Hunts FA with a view to a future funding application, and therefore it is expected that detailed designs and specifications would be submitted at a later date to support a full application

We advise you seek further pre-application advice with Sport England on the detailed design of the AGP once these plans are finalised. You should set out within the Design and Access Statement whether the AGP is to be used for rugby, and if it is, you should ensure it is designed to the necessary specifications.

#### *Grass Playing Pitches*

A playing field layout plan should be provided to show what proposed playing pitches are going to be provided alongside the AGP. You should also provide a playing field layout plan of the existing playing pitches on the site.

### Conclusion on Benefits of the Proposal

The delivery of a 3G AGP on this site would assist meeting the demand for football and would alleviate pressure on existing youth and mini football. The proposal will however lead to the loss of part of a playing field where there is a cricket square. The PPOSS considered the cricket square to the north of the AGP to of had capacity available during mid-week and Sundays. The ECB have advised that the cricket square now has limited capacity and cannot support the club's future growth. The loss of the cricket square as a result of this proposal will impact the future demand for cricket; thus it is recommended that measures be taken to mitigate this loss. We advise that you address the ECB's feedback. Should you need the ECB's contact information for discussions on appropriate mitigation, please let me know, and I will provide their details to facilitate these discussions. We also request that Sport England be included in any conversations regarding mitigation to ensure our support for the proposed measures.

Further information is required on the proposed design of the AGP and the benefits for the local community. The plans of the 3G AGP have yet been submitted, although it is understood these are being drafted with the FF. We advise you seek further pre-application engagement with Sport England prior to submitting the planning application to ensure the design of the proposals considered satisfactory.

Sport England may take the view that the proposal would meet exception 5, if the information outlined within this letter, are addressed and considered to demonstrate that the proposal is of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the area of playing field.

If a proposal were to be considered to meet exception 5, it is likely that our position would be subject to several planning conditions, including, but not exhaustive, a maintenance and management plan, and a mitigation strategy for the rubber crumb infill of the AGP.

The above comments reflect Sport England's current understanding of the proposal based on the information so far provided. Should the proposal or accompanying information be updated, this may lead to a change in Sport England's position.

Sport England reserves the right to object to any subsequent planning application if we do not consider that it accords with our Playing Fields Policy or paragraph 104 of the NPPF.

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

If you would like any further information or advice, please contact me.

Yours sincerely,

*Clare Howe*

**Clare Howe MRTPI Msc BA(Hons)**

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## **Annex**

### **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)