

Wokingham Borough Council

FAO:

By email only

18th April 2026

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

Application Reference: 260425

Site: St Paul's C Of E Junior School Oxford Road Wokingham RG41 2YJ

Proposal: Full Application for the proposed single storey SEND resource base and associated landscaping

Sport England Reference: PA/26/SE/WON/73673

Dear Sir/Madam

Thank you for consulting Sport England on the above application.

Summary

Sport England **objects** to this application as it is not considered to meet any of the exceptions to our Playing Fields Policy or to accord with paragraph 104 of the National Planning Policy Framework (NPPF).

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

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. The exceptions are provided in the Annex to this response.

The proposal and impact on playing field

The proposal is for single storey SEND resource base and associated landscaping, which will result in the loss of playing field.

Assessment against Sport England's Playing Fields Policy and NPPF

Wokingham Borough Council's Development Team, are factually incorrect in a number of areas in their planning statement. Sport England would be happy to explain the correct meaning of paragraph 104 of the National Planning Policy Framework at a mutually convenient time.

They have tried to make the case at proposal meets bullet point c):

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

However, SEND building does not repeat not meet this exception, as the exception is talking about the loss of playing for other sports use such as an artificial grass pitch or sports hall.

They also go on to say that the affected land is not marked out of P pictures or crook in Plainfield however the two aerial photographs which admittedly are in the past sure the area being laid out for football pitch or being a non-compliant size and a running track. The whole point of a playing field area is that it can be laid out in multiple variations for different sports of different sizes.





So based on the above aerial photographs the Statement which is made on page 6 about other material considerations is completely inaccurate.

Therefore, the policy compliance conclusion is itself inaccurate.

Sport England accepts the need for this classroom Sport England also has looked very carefully at whether or not this proposal could in actual fact meet a planning policy exception 3, unfortunately given previously outs for the athletics this is not possible and also for the most recent photograph above which shows an area laid out for some football Please note that there is been an introduction of a 3V3 football pitch which measures approximately 10 metres by 15 metres plus a runoff area.

Therefore, having examined the site closely unless the proposed building is moved completely off the playing field the proposal would not meet any of the exceptions set out in paragraph 104 of the NPPF as the application currently stands.

Unfortunately, this has meant that Sport England unfortunately has to object to this planning application

Sport England's position

Given the above, Sport England raises a **statutory objection** to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 104 of the NPPF.

Potential to overcome the statutory objection

With reference design access statement Sport England believes that if locations 1, 2 on 3 showing on the proposed options appraisal 3.1, Sport England would not have a statutory objection to planning application If the building was to be located on one of these locations

As mentioned above Sport England would be very happy to provide some CPD to Wokingham BC's development team in order to ensure a better understanding of paragraph 104 of the National Planning Policy Framework if someone from that team would like to contact me we can arrange suitable lunchtime session if that was convenient.

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).

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

Yours sincerely,

Bob

Bob Sharples RIBA ARB MRTPI

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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