

DRAFT

St Paul's SEND Unit – Playing Field Technical Note

1. Introduction

This note has been prepared to support ongoing discussions with the Local Planning Authority and Sport England in respect of the proposed SEND Resource Base at St Paul's Junior School.

The purpose of the note is to:

- clarify the impact of the proposal on playing field land
- set out the extent to which the retained playing field would continue to function
- provide context regarding the role and significance of the site
- identify any potential mitigation or enhancement measures

The original Planning Statement relied on NPPF paragraph 104(c) in support of the proposal. On further review, and having regard to Sport England's response, it is accepted that this interpretation was incorrect, and that criterion (c) applies specifically to alternative sports and recreational provision. The proposed SEND facility does not meet this definition. Accordingly, it is acknowledged that the development results in the loss of playing field land and therefore gives rise to a conflict with paragraph 104 of the NPPF.

2. Existing Site and Playing Field Context

St Paul's Junior School comprises an established school campus with associated playing field provision.

Wokingham Borough Council's (WBC) Playing Pitch Strategy (2023) identified that, at the time:

- the site accommodated 2 mini football pitches;
- ancillary provision was rated as "poor", indicating limited supporting infrastructure; and
- the site was not available for community use and was therefore excluded from the borough's strategic pitch supply assessment.

As such, whilst the site constitutes playing field land for planning purposes, it:

- does not form part of the borough-wide community pitch stock; and
- performs a localised, school-only function.

3. Description of Proposed Development

The proposal comprises the erection of a single-storey SEND Resource Base (circa 260m² GIA) and associated external learning area, proposed to be located adjacent to the swimming pool and nature garden.

The development footprint occupies a peripheral area of the wider playing field.

4. Extent of Playing Field Impact

4.1 Nature of loss

The proposal results in the permanent loss of a portion of playing field land.

However:

- no currently marked pitches are directly displaced
- the development is located at the edge of the field
- the majority of the playing field remains intact

4.2 Quantified impact

- Total playing field area ~0.485ha
- Area lost ~0.057ha
- ~12% loss

5. Retained Playing Field Function

5.1 Post-development Layout

A revised playing field layout plan (Drawing Ref: WKR _ RSS _ 02 _ 00 _ DR _ A _ 1213) has been prepared to demonstrate a potential configuration of the retained playing field following the proposed development.

The proposed layout confirms that the playing field would still be able to accommodate:

- two mini football pitches comprising a seven aside pitch (37m by 27m) and a five/six a-side pitch (30.6m by 18.5m);
- both within the official “usable” range identified by the FA¹ and inclusive of suitable run-off and safety margins;
- consistent with the provision identified within the Playing Pitch Strategy; and
- sufficient space to allow for flexibility in pitch layout and repositioning over time.

¹ Guide to indoor and outdoor areas for small sided football, mini-soccer and futsal (The FA: 2025)

The development has been carefully positioned on the periphery of the wider playing field to minimise interference with the principal pitch areas and to retain the ability to organise sports activities effectively within the remaining space.

5.2 Consideration of Playing Field Flexibility

Sport England has highlighted, with reference to historical aerial imagery, that the wider playing field has previously been laid out in a variety of configurations, including football pitches of different sizes and informal athletics activity. It is recognised that the value of playing field land lies in its inherent flexibility to accommodate different sporting layouts over time.

This is acknowledged. It is accepted that the application site forms part of the wider playing field and contributes to the overall flexibility of the space. The proposal therefore results in a reduction in the total area available for potential pitch configurations and informal sporting activity.

5.3 Functional Assessment

Notwithstanding the above, the assessment of impact should also consider the practical functioning of the playing field in its current and ongoing use rather than its theoretical capacity alone.

In this context, the retained playing field:

- continues to accommodate the school's required physical education (PE) curriculum activities;
- retains sufficient flexibility for the layout and repositioning of pitches;
- allows for continued use of the identified mini football pitches with appropriate safety margins; and
- is not fundamentally constrained in its day-to-day operation.

While the proposal reduces the overall area of playing field, it does not prevent the effective organisation of sports and outdoor activities within the remaining space.

5.4 Curriculum Requirements

St Paul's Junior School provides outdoor space to support the delivery of the PE curriculum, including both formal and informal sports activities appropriate to a primary school setting.

The curriculum does not require the provision of full-size marked pitches. Instead, it requires access to flexible outdoor space capable of accommodating a range of activities, including:

- small-sided football and other team games;
- athletics-based activities; and
- general physical exercise and movement-based learning.

The proposed development has been located and assessed with regard to these requirements.

The retained playing field area remains capable of accommodating these activities, and the reduction in overall space does not prevent the school from delivering its PE curriculum or undertaking day-to-day outdoor activities.

5.5 Conclusion on Functional Impact

In summary, whilst the proposal reduces the theoretical flexibility of the playing field as a spatial resource, the evidence demonstrates that:

- the principal pitch provision can be retained;
- the playing field continues to function effectively for school use; and
- there is no material prejudice to the ability of the school to deliver its curriculum or organise outdoor activity.

Accordingly, the proposal does not result in a fundamental loss of the functional utility of the playing field, notwithstanding the acknowledged policy conflict arising from the reduction in its overall area.

6. Options Appraisal (Summary)

A five-site options appraisal has been undertaken.

Sport England has raised objection to the proposed location (location 5) but have indicated that locations 1–3 may be acceptable in principle.

6.1 Alternative site constraints

- Option 1
 - located above gas infrastructure
 - severs key circulation routes
 - displaces equipped play space
 - direct impact upon use and function of adjacent building
- Option 2
 - requires removal of mature tree(s)
 - results in loss of core hard play provision, including a marked court
 - location directly adjacent main entrance raises safeguarding issues
- Option 3
 - Results in loss of trees and landscaped area

- displaces actively used informal play and learning space
 - closest to neighbouring noise sensitive residential properties
- Option 4
 - fails to meet safeguarding and supervision requirements
 - would also reduce playing field
- Option 5 – Selected – does result in loss of part of the playing field, but:
 - best circulation link
 - meets access requirements
 - located away from residential boundaries
 - no trees impacted

6.2 Conclusion

All options result in loss of external space; however it is considered that Option 5 represents the only deliverable solution that avoids equal or greater operational and planning harms.

7. Nature and Significance of the Playing Field

The Playing Pitch Strategy provides important context:

- the site is not part of the borough's strategic pitch supply
- it is not used for community sport
- it is excluded from pitch supply tables used for demand modelling

Accordingly, the loss does not impact on strategic borough-wide pitch supply or community sport provision.

The effect of the development is therefore:

- localised
- limited to school use

This context does not alter policy protection but is relevant in understanding the scale and nature of the impact.

8. Potential Mitigation / Enhancement Measures

While it is recognised that the proposal results in the loss of part of the playing field, opportunities to minimise and mitigate the impact have been considered.

In practical terms, the scope for direct mitigation on-site is limited given the scale and nature of the development. However, the following measures are proposed and/or being explored:

- retention and clear delineation of the existing mini football pitches within the revised layout;
- improved pitch marking and configuration to ensure efficient use of the retained playing field area;
- continued flexibility in pitch layout to allow repositioning and rotation of pitches over time; and
- consideration of opportunities to improve the usability of the retained field (for example through minor enhancements to surface condition where feasible).

Beyond the immediate site, the Council is bringing forward wider investment in sports provision, including the Gray's Farm Sports Hub. While not mitigation in policy terms, this provides context that overall sports provision within the borough is being enhanced.

9. Planning Position

It is acknowledged that the proposal:

- does not meet the exceptions set out in national policy or Sport England policy; and therefore
- gives rise to NPPF policy conflict.

However, the following factors are material and it is requested should be given consideration:

- the limited scale of the loss
- the continued functionality of the playing field
- the absence of viable alternative sites
- the lack of strategic importance of the site
- the significant and evidenced need for SEND provision

10. Conclusion

The proposal represents a departure from policy. However:

- the harm is clearly defined and demonstrably limited
- the retained playing field continues to function for school use
- there is no impact on the borough's strategic pitch supply

In planning terms, the decision therefore turns on whether the limited and clearly defined harm to playing field land, to which national policy affords considerable protection, is outweighed by the very substantial and evidenced need for SEND provision, to which national policy also affords significant weight.