



ST ALBANS  
SCHOOL



PART OF HENRY BOOT



**WOOLLAM  
PARK**  
North St Albans

# SPORTS JUSTIFICATION REPORT

DECEMBER 2024



**NORTOFT  
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# **North St Albans**

## **Sports Justification Report**

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# SPORTS JUSTIFICATION REPORT

## 1. SUMMARY

- 1.1. The proposed replacement of the playing field Area A by new provision on Area X is fully in accordance with Sport England's Exception 4 test, and as such also meets the tests of NPPF para 104(b) and the emerging policy of the Local Plan B1(4). It also satisfies the agreement between OASA and The St Albans School Woollam Trust.
- 1.2. The cricket natural grass wickets are replaced, and the additional capacity for cricket provided by the non-turf wicket (NTP) responds to the needs of the growing junior sections of the OACC. This will provide around 60 additional match equivalent sessions on the cricket pitch per year. The NTP can also be used by the lower senior cricket leagues. The provision of the NTP goes beyond the direct replacement, and is also justified by the development generated demand from the North St Albans development.
- 1.3. The rugby pitches on Area X are designed to meet the RFU recommendations and are larger in area than the existing pitches, with full run-offs.
- 1.4. There is an overall net increase in useable playing field area of 0.76 ha. The playing field will be on a single specially constructed and drained platform, enabling flexibility in the marking out of pitches to meet the changing needs of the OARFC over time.
- 1.5. The pavilion annex is a critical requirement of the ECB, and is supported by Sport England. This new provision will help improve safeguarding measures for all users of the replacement playing fields over the current situation, as toilets are immediately accessible. The design considers the fact that the social elements will continue to be provided in the existing OASA main pavilion. The new building will provide the minimum facilities required, keeping its bulk and footprint as small as possible, so minimising the impact on the Green Belt. It will be located to meet the technical requirements of cricket, and occupies a site well screened by the spinney and mature hedges.
- 1.6. Woollam Playing Fields is – and will continue to be - one of the largest areas of playing field space in St Albans, and provides high quality facilities and is used by a large number of people.
- 1.7. Both the OASA and the school's site offer access for a range of community sport, with the OASA being the main provider for cricket and rugby, and the school for hockey as well as some cricket and rugby. This will continue with enhanced facilities with a larger relocated playing field area, with better quality pitches, supported by a new pavilion annex and adjacent parking.
- 1.8. Technical studies have shown that the relocated and the remaining OASA facilities will not be compromised by the proposed residential development.
- 1.9. Overall these proposals constitute a significant betterment for community sport, and that they fully meet Sport England's Exception 4 tests, NPPF para 104, and the draft Local Plan policy B1(4).

## 2. INTRODUCTION

2.1. This report supports the North St Albans allocation application, for which planning permission will be sought for the following development:

- (1) Relocation and replacement of existing playing fields and erection of pavilion annex; and*
- (2) Construction of up to 1000 new homes (Use Class C3) to include a mix of market housing, affordable housing, age restricted specialist accommodation for the elderly, adult disability service units; a care home (Use Class C2); a local centre (Use Classes E and F); a primary school (Use Class F); the laying out of green infrastructure including habitat creation; drainage infrastructure; earthworks; pedestrian and cycle routes; new means of access and alterations to existing accesses.*

*The application is submitted as a “hybrid” application. Part (1) is submitted as a full application. Part (2) is submitted as an outline application with approval of means of access sought at the present time, and all other reserved matters to be approved at a later date.*

2.2. The report addresses the planning justification of two sports related elements in respect to the North St Albans housing application:

2.2.1. the necessary replacement and enhancement of those existing rugby and cricket pitches that have been included in the draft Local Plan allocation for North St Albans.

2.2.2. proposals for meeting the development generated demand for sports from the new housing population.

2.3. In respect to the replacement playing field area, this report sets out how the proposals are fully in accordance with ‘Exception 4’ of Sport England’s “Playing Fields Policy and Guidance” (2018). The wider planning policy justification is provided within the Planning Statement which accompanies the application.

2.4. This report is structured in the following chapters:

- 1 Summary
- 2 Introduction
- 3 The Woollam Playing Fields
- 4 Proposed replacement playing field Area A
- 5 Protecting the remaining OASA site
- 6 Protecting the St Albans Girls School site pitches
- 7 Meeting the sports demand from the North St Albans
- 8 Conclusions

## 3. THE WOOLLAM PLAYING FIELDS

### History and context

- 3.1. The freehold of The Woollam Playing Fields, comprising of both the St Albans School's and the Old Albanian Sports Association's (OASA) facilities, and the immediately adjacent field known as Longcroft, is held by The St Albans School Woollam Trust (Charity number 311020). The remainder of the surrounding farmland is owned by St Albans School (charity number 1092932).
- 3.2. The northern part of the site has its own pavilion and is used by the School, with several community clubs also using the facilities. The southern part of the site is leased to the Old Albanian Sports Association (OASA, charity number 1107746) for 250 years from 2002. The OASA operates rugby, cricket and tennis clubs, and is fully open to community membership. The OASA also has its own large pavilion catering for sports changing, social use, and administration.

### The original layout of the playing fields

- 3.3. The 2001 "as built" plan of The Woollam Playing Fields (Appendix 1) shows the mixture of pitches and sports provided for, plus locations of the pavilions used by the School and that of the OASA. This 2001 plan shows:
  - 3.3.1. North part of site (north of red line on 2001 plan) – primarily used by St Albans School had:
    - 5 x rugby pitches (various sizes)
    - 1 x football pitch (marked for 11v11)
    - 4 x small size pitches for winter sports (not marked) on cricket outfields
    - 2 x cricket pitches with 9 and 11 grass wickets with winter pitches on outfields
    - 1 x cricket pitch with 11 grass wickets, no winter pitches marked on outfield
    - 2 x cricket pitches both with 9 grass wickets
    - 2 x stand-alone non-turf cricket wickets (NTP)
    - sand filled AGP with primary marking for hockey and secondary marking for 9 tennis courts
    - macadam sports court marked out for 4 x tennis and 2 x netball courts.
    - cricket nets both natural turf and artificial (NTP).
  - 3.3.2. South part of site (south of red line on 2001 plan) – leased to OASA had:
    - 5 x rugby pitches
    - 1 x rugby training area
    - 1 x cricket pitch with 10 grass wicket and 1 x non-turf artificial wicket (NTP) with no winter pitches marked on outfield
    - 1 x cricket pitch with 9 grass wickets with rugby pitches overlaying outfield

## Current provision (2024)

3.4. There have been a number of changes in the pitch mix over time on both parts of the site, reflecting the changing demand for different sports. Compared to the “as built” record, the main differences in 2024 are:

3.5. On the north (school) part of the site:

- Sports lighting and resurfacing of the sand filled pitch.
- Provision of an additional non-turf pitch between two football pitches.
- Upgrading of one of the natural turf wickets to hybrid on the school’s Cricket Pitch 1.
- The 5 x cricket nets close to the school’s Cricket Pitch 1 improved to part-hybrid for the batting areas.
- The other cricket nets changed to an artificial surface.
- Provision of gym for Saracens RFC exclusive training use.

3.6. On south (OASA) part of site:

- Rugby training pitch (west of OASA pavilion) extended and provided with sports lighting.
- Removal of the non-turf wicket (NTP) from Cricket Pitch 1 (located between the OASA pavilion and Harpenden Road) and its replacement with a grass wicket, providing a total of 11 natural grass wickets on this pitch.
- Single natural turf wicket for junior use north of Cricket Pitch 1.
- Enlargement of rugby pitches south of access road (by reducing margins). These pitches are included in the North St Albans residential allocation, and allocated for the main site access, and so require replacement.
- Sports lighting provided for the OASA tennis courts.

## Ownership and management

3.7. See above. The St Albans School Woollam Trust owns Woollam Playing Field and leases the southern part to the OASA.

### *St Albans School Woollam Trust*

3.8. The following extracts are from the charity’s annual return to the Charity Commission for the year ended August 2023 provides a useful summary of the ownership and management of the Woollams Playing Field site:

The primary objective of the St Albans School Woollam Trust (Woollam Trust)  
*“is the provision and maintenance of playing fields and other recreational facilities for pupils attending the School”*

*Some 30 acres of the playing fields are sublet to Old Albanian Sports Association (OASA) on a 250-year lease (granted on fully commercial terms). In accordance with the terms of its lease, OASA provides community sports facilities in its own right as well as sub-letting facilities to Saracens plc, a leading Rugby Union club. While the Trust is not a*

*party to OASA's sub-letting (other than providing gym facilities available to Saracens), it welcomes this arrangement as it serves to build a clear relationship between school sport and national level sport.*

*The Trust continues to work with the Old Albanian Sports Club in maintaining playing surfaces and expanding their usage. Maintenance of the whole site continues to be undertaken by the Woollam Trust to provide playing surfaces up to regional standard. Saracens, the premiership rugby union club, uses Woollams as their main training facility, leasing pitches and facilities from Old Albanians and the Trust. This partnership provides a unique combination of school and local sides, national level and premiership level rugby on one site.*

*Woollams continues to be seen as a centre of excellence for grounds maintenance ...."*

- 3.9. The school directly manages both the playing fields and the school's pavilion on their part of the Woollam Playing Field.

#### *Old Albanian Sports Association*

- 3.10. The Old Albanian Sports Association (OASA) leases the southern part of the Woollams Playing Field area from the Woollam Trust. The OASA pavilion provides the changing and social space for their part of the site, and it is the hub of most of the community activity.

- 3.11. The Old Albanian Sports Association (OASA) is a charitable company (charity number 1107746) and it has the charitable objects of:

*(A) The promotion of community participation in healthy recreation in particular by the provision of facilities for members of the public to engage in team sports, athletics, fitness training and other forms of physical recreation;*

*(b) To advance the education of young persons attending schools, colleges and universities in St Albans and the surrounding area by ensuring that due attention is given to their physical development and to assist in the organisation and provision of facilities which will enable and encourage participation by such persons in physical recreation and sport;*

*© In the interests of social welfare to organise or provide facilities for recreation for persons resident in St Albans and surrounding areas who by reason of their youth or social and economic circumstances have need of such facilities with the object of improving their conditions of life; and*

*(d) Such other charitable purposes as the committee of management shall think fit.*

[Source: Charity Commission]

- 3.12. The OASA's annual charity return for the year ended March 2023 provides a useful summary.



Page 3 confirms that:

*The principal activity for the charity in the year in order to fulfil its objectives was to provide high standard facilities for the local community to participate in sporting activities. By the provision of these high standard facilities, the Charity remains able to fulfil its objectives.*

Page 4 provides a summary of its operation:

*The charity, which operates as "OA Sport" and its wholly owned subsidiary, Old Albanian Sports Club Limited, own and operate modern field sports facilities at Woollams which opened in 2001. The charity provides pitches, training facilities, pavilion changing rooms, bar, catering and social areas for members and guests of the following affiliated clubs:*

*Old Albanian Rugby Football Club (which includes the Old Albanian Mini and Junior RFC and Old Albanian Saints, ladies rugby)*

*Old Albanian Cricket Club*

*Old Albanian Tennis Club*

*Old Albanian Club*

*Local Adult Groups*

*Woollams is also the training base for Saracens RFC. ....*

*Facilities are also provided to other sports clubs and for representative fixtures.*

*The charity aims to provide playing facilities to a high standard for players of all abilities and therefore operates a continuous and comprehensive programme of pitch maintenance and renovation. ...*

*The Charity's facilities are much in demand due to their high standard ....*

*... the Charity meets its objectives .... by the large number of participants that use the facilities throughout a normal week, approximately 2500 people, involved in both training, playing and supporting. The facility, having reached capacity, is now managed .... for the long term with strong regard given to the ongoing maintenance and refurbishment.*

- 3.13. The OASA manage the playing field area and pavilion on their leased land, and contract the grounds maintenance to the staff of St Albans School, so the playing fields benefit from consistent and high quality management across both parts of The Woollam Playing Fields.

## Current use of Woollam Playing Fields

3.14. The following extract is from the St Albans School Woollam Trust charity's annual return to the Charity Commission for the year ended August 2023. This demonstrates the scope and importance of The Woollam Playing Fields as a whole:

*The Woollam Playing Fields [both the area leased to OASA and the school playing fields] continue to provide an important venue for the national as well as the local community. Over recent years, users, principally of school age, include:*

- *Saracens training camps, covering ages 6-16;*
- *Hertfordshire rugby sevens finals;*
- *Old Albanians Rugby, including their minis and juniors, with some 400-500 under-18 rugby players on site on Sundays;*
- *Old Albanian cricket, with their junior teams using the facilities frequently over the period;*
- *Harpenden Hockey, including both juniors and seniors, male and female;*
- *County and District Cricket, including the ECB Junior Cricket Finals;*
- *Harpenden Lacrosse;*
- *Hertfordshire Fire and Rescue for their football matches;*
- *Cricket academies for children 7-16;*
- *Charity bicycle rides;*
- *District, County and Regional Rugby as well as Football and Cross-Country of all Levels;*
- *Woollams and Cheapside Farm are used as a Cross country course at both local and National level events.*

### OASA

3.15. The OASA provides for the community sports of rugby, cricket and tennis. The tennis provision is unaffected by the North St Albans application, so the following focuses upon rugby and cricket, which are both affected.

3.16. The OASA main pavilion has 10 changing rooms, an extensive bar and social area, a professional kitchen, and further social / meeting room spaces. It also has office spaces used by the OASA and by Saracens RFC.

### Rugby Union

3.17. For the 2023/24 season the Old Albanian Rugby Football Club (OARFC) had:

- around 800 mini and junior members with a growing girls' section
- a senior women's team
- 3.5 men's teams.

- 3.18. In order to help meet the increasing junior demand, the club has a rolling hire agreement with the school to use four of the school's rugby pitches at Woollam on Sundays for minis and juniors.
- 3.19. The OARFC also staggers its programme on Sundays in order to accommodate the large numbers, with minis starting early, the junior boys mid-morning, junior girls around lunchtime, and women in the afternoon.
- 3.20. There is surplus pitch capacity on the OASA site for all of the senior teams at match time, which includes the main, sports-lit pitch in front of the OASA pavilion.
- 3.21. The pitches on the OASA site vary in size. Only the main match pitch (directly outside the pavilion) and the pitch currently used by Saracens RFC for training (located on Area A, and so impacted by the North St Albans development) meet the RFU recommended size for senior pitches. The technical report by TGMS (Appendix 4) confirms the sizes of the pitches on Area A.
- 3.22. There are a further two pitches on Area A impacted by the North St Albans scheme which are used by the juniors.

### *Cricket*

- 3.23. In 2024, the Old Albanian Cricket Club (OACC) ran the following activity:

Matches to 7<sup>th</sup> September:

- 4 senior men's teams playing on Saturdays, with around 90 matches.

Matches to end August:

- 13 x U9 to U11 teams, variable days excluding Saturday, with around 130 matches.
- 11 x U12 to U15 teams, variable days excluding Saturday, with around 100 matches.

- 3.24. The senior teams all play in the Herts Saracens League, divisions: 5B, 9 West, 10 Central and 11 Central. They play on the two cricket pitches on the OASA site with the 1<sup>st</sup> and 2<sup>nd</sup> teams (playing in Divisions 5B and 9) playing on cricket pitch 1 directly outside the OASA pavilion. The two lower-level teams play on cricket pitch 2 which is located in Area A and so are affected by the North St Albans allocation. Area A does not have a separate pavilion building.
- 3.25. The Herts Premier Cricket League (aka Saracens Cricket League) rules for the senior cricket are set down in the handbook (see Appendix 2). Of particular note (p2) are the requirements for changing rooms which are:

For Divisions 10 and below	“close to the playing area”
For Divisions 7-9	“changing rooms must be adjacent to the playing area”
For Divisions 5a – 6b	
For Divisions 4b and above	Changing rooms must be an “adequate size” and the pavilion must have a bar.

- 3.26. Also of note is the limitation on the use of NTPs for senior cricket (see clause 10, Appendix 2) which is to Divisions 10 and 11.
- 3.27. The OACC juniors play in the Herts Junior League but as the demand exceeds the space available on the OASA site, (limited in part by the absence of any non-turf pitch), the OACC uses cricket pitches on the school part of Woollam for 10 weeks a year between April and July, using the astro nets and one cricket pitch.
- 3.28. The school’s NTP and nets were also used for 10 days for a summer holiday coaching programme in 2024 by the Superstumps organisation.
- 3.29. The Herts Junior League sets down rules in relation to pitch lengths (juniors have shorter pitches) and the use of artificial turf pitches (NTP), see Appendix 3. The use of NTPs is restricted to U11 matches.

#### St Albans School

- 3.30. St Albans School uses the northern part of Woollams Playing Field and has its own pavilion. The school uses the site for curriculum and extra-curricular sport Monday – Saturday with the exception of the school holiday periods. Community access to the school pavilion is controlled for safeguarding reasons.
- 3.31. Outside of the school use times, the school hires out its pitches, primarily to the OASA. However, the hockey AGP is used by Harpenden Hockey Club and Harpenden Lacrosse. The hockey club’s senior matches are held on site in the autumn, but then move to Clarence Park in the city centre between January and the end of the season, due to clashes with the school’s matches on Saturdays. The hockey club still hires the hockey pitch from January through to Easter for 3 evenings per week, and on Sundays (for juniors).
- 3.32. Community use for 12 months since September 2023 of the School’s pitches and facilities for sports other than rugby and cricket, which is via the OASA, is summarised in Table 1 below.

*Table 1: St Albans School community hire excl OASA use*

<b>Facility</b>	<b>Hirer /purpose</b>	<b>No. hours</b>	<b>When</b>
Hockey AGP	Harpenden Hockey Club training	2 hrs Monday – Wednesday	Mid Aug - Dec
Hockey AGP	Harpenden Hockey Club matches	6 hrs Saturday	End Aug – Dec
Hockey AGP	Harpenden Hockey Club matches and training minis and juniors	4.5 hrs Sunday	Sept - Dec
Hockey AGP	Harpenden Lacrosse	2 x hrs Tuesday	Sept - March
Hockey AGP + toilets in pavilion	Hockey junior camp	6 hrs x 2 days	4 days October - November
Hockey AGP + toilets in pavilion	Hockey junior camp	Average 7 hrs	5 days August
Pitch cricket + pavilion changing	1 x cricket	5 hrs	1 day May
Pitches football	5 x football School's district finals	2.25 hrs x 2 days	2 days March
Pitches football	1 x football Club	2 hrs Friday	Weekly Sep - Feb
Pitches football	1 x football	2 hrs x 1 day	August

3.33. The hiring of the sports facilities by the School for community use at Woollam is consistent with the School's wider approach, as the School also hires its swimming pool, sports hall, fitness suite and dance studio to community users at its city centre site.

#### **Saracens RFC use of Woollam Playing Field for training**

3.34. The Saracens RFC professional rugby club sub-lets space from the OASA, and has used the OASA as their training base since 2009/10. They have exclusive use of the western pitch on Area A, plus parts of the OASA building including changing rooms and office space. Other parts of the OASA pavilion are used as shared spaces, by the Saracens RFC during training times (primarily weekday daytime), but otherwise are used by the community.

3.35. Saracens RFC also lease separate gym facilities from St Albans School, adjacent to the School's maintenance shed.

3.36. The Saracens RFC are due to vacate Woollam Playing Fields once their own training site at Stonex is operational. Whilst planned, there is currently no fixed date for this, and Saracens are expected to renew their leases on both pitch and gym for the next two years. Saracens RFC's departure from the OASA site will have the advantage of releasing pitch and pavilion space and capacity for further community sports, but will also mean a significant fall in income for the OASA (and, to a lesser extent, St Albans School). From

OASA's perspective this will be more than offset by their significant share of the receipt from the development of Area A.

## 4. PROPOSED REPLACEMENT OF PLAYING FIELD AREA A

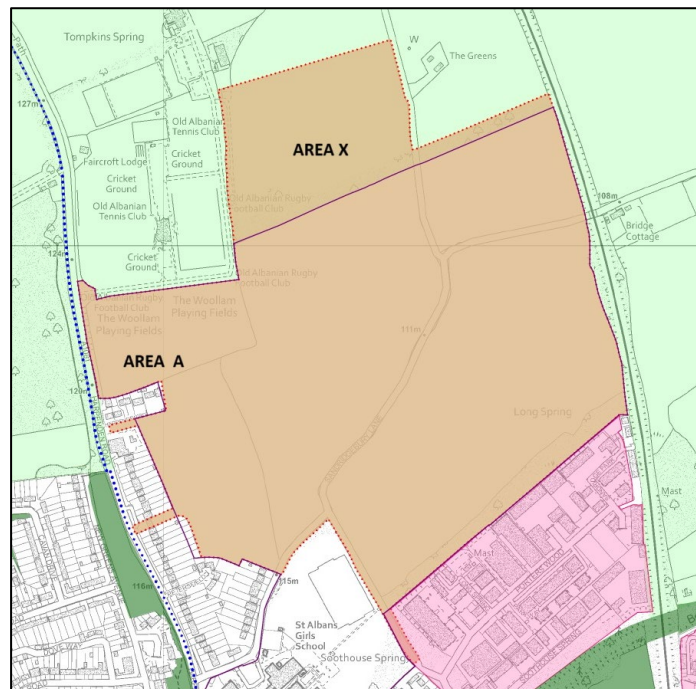
4.1. The North St Albans residential allocation, addressed in Policy B1 of the Draft Local Plan 2024 Regulation 19 Publication (September 2024) includes:

*4. Replacement of the displaced playing fields. The replacement playing fields must be an equivalent or better playing field in terms of quantity and quality and delivered prior to commencement of any development on the existing playing field. Sport England will be a statutory consultee on any future planning application that would affect the playing field within this site allocation.*

4.2. An extract of the draft Local Plan policy map showing the North St Albans allocation, the existing playing field area to be replaced (Area A) and the proposed replacement location (Area X) is given in Figure 1.

4.3. Area A provides three rugby pitches of various sizes together with one cricket pitch with 9 grass wickets.

*Figure 1: North St Albans residential allocation showing Areas A and X*



4.4. This section of the report summarises the proposals for the replacement of the pitches on Area X including the betterment which will be achieved in relation to the playing field, together with the ancillary facilities that will be provided. It also summaries how the

proposals have responded to the detailed consultation with Sport England, the Rugby Football Union (RFU), the England and Wales Cricket Board (ECB), Hertfordshire Cricket Board (Herts Cricket) and the OASA.

- 4.5. The detailed technical feasibility report from the specialist agronomist company TGMS is provided as Appendix 4. The TGMS report assesses the existing playing field area and pitches provided on Area A, and includes detailed plans of the pitch layout and construction proposals for the new area of playing field, Area X.
- 4.6. The overarching policies, including in those relating to Green Belt, are addressed in the Planning Statement, but this report considers the statutory consultee Sport England's playing field policy, and demonstrates how the proposals are in accordance with it. Sport England's policy provides their interpretation of the NPPF para 104(b), and in some respects is more onerous. Accordance with the Sport England policy ensures that there is accordance with both NPPF para 104 and the Local Plan draft policy B1(4) which is similar in approach in relation to the protection of playing fields.

### The replacement playing field – Area X

- 4.7. The replacement playing field is located to the east of the OASA existing leased site on agricultural land. It is therefore 'new' playing field space. The proposed playing field layout is provided in Figure 2. It will be supported by a small pavilion annex which is the minimum size to meet the requirements of the ECB and Sport England. This small size will also minimise both the running costs and its impact on the Green Belt, see Figure 3 for its location, and Figure 4 for the concept plan with its layout.

Figure 2: Proposed Area X showing pitch layout and sizes  
 (See Appendix 4, TGMS Feasibility Study for detailed plans)





Figure 3: Pavilion detailed position on Area X

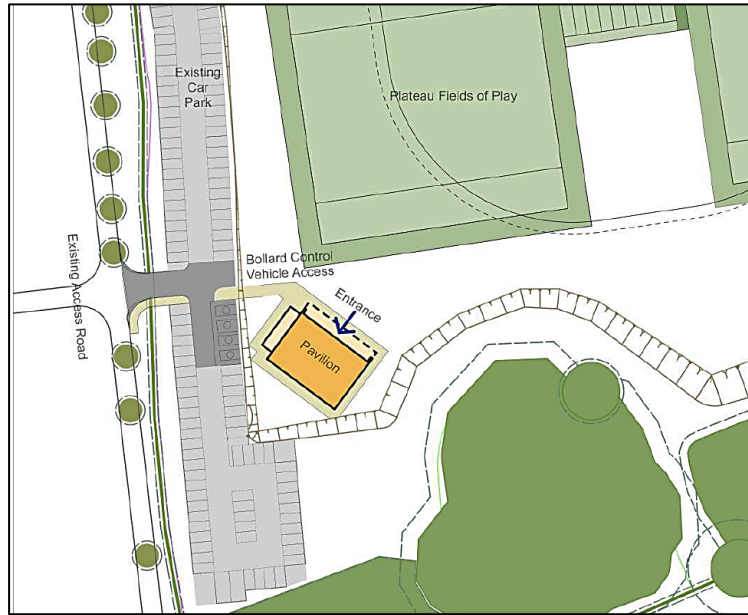
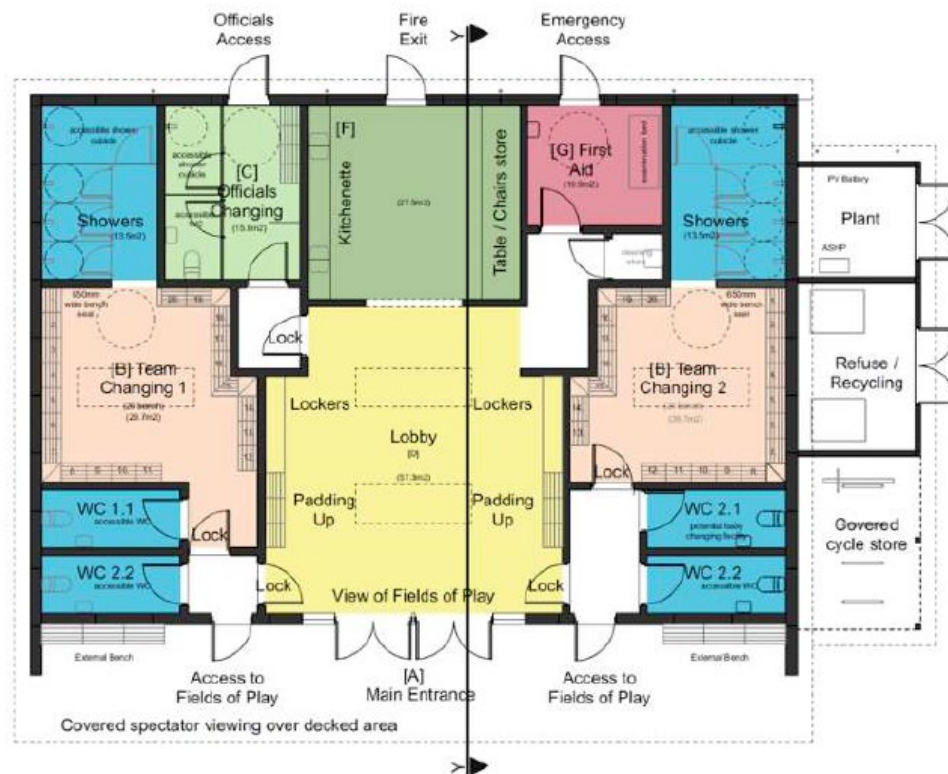


Figure 4: Pavilion annex layout concept plan

(Extract from DESIGN STATEMENT (To be read in conjunction with site-wide DAS and Define Planning drawings DE-565-012 Planning Proposal & DE-565-013 Floor & Roof Plan), 22nd November 2024 DE 565



## Ball strike assessment

4.8. A ball-strike assessment has been undertaken by Labosport for Area X, and this is provided in Appendix 5, and as a separate section to the planning documents (Ball Strike Assessment). The report concludes that although no cricket ball stop netting is required, it is required for the rugby use. The netting can be seasonal as the community rugby season runs from approximately the start September through to the end of April. The recommended heights for the ball stop netting by Labosport are:

Orientation	Recommended mitigation height (based on adult rugby)
East	3m
Southwest	4.5m
West	4.5m

4.9. The illustration in Figure 5 is taken from the Labosport report summary and shows the locations of the recommended seasonal ball strike netting.

*Figure 5: Ball strike netting recommendations – new pitches on Area X*



## Noise and lighting

4.10. The potential noise arising from the use of the Area X for replacement playing fields was included in the technical report by Noise Consultants Ltd, Appendix 14.6 Woollam Park – Site Suitability Assessment. The key finding, illustrated in Figure 7, was that the noise level would be below that requiring any mitigation.

4.11. In relation to lighting, it is not proposed to provide any sports lighting on Area X, so the pitches and the pavilion annex which supports the pitch use (primarily cricket), will effectively be limited to daytime use. There are therefore no lighting concerns associated with the proposal.

## Developing the proposals

4.12. Detailed consultations have been held with Sport England, the RFU, ECB, Herts Cricket, the OASA, and St Albans School Woollam Trust. The agreed notes of a site visit and round table discussion held on 12<sup>th</sup> January 2024 are provided as Appendix 6. The proposals for Area X reflect the conclusions of the meeting, the principal points being:

- The OASA has the full support of their constituent clubs for the proposals.
- The proposed plan for Area X was agreed by all parties at the meeting, subject to the detailed technical report demonstrating feasibility from TGMS. This Agronomists Technical Report should include formal Equivalent Performance Assessment (EQA) of the existing pitches and confirmation that the replacement pitches will be of same quality and at least the same size of pitches can be provided. [See Appendix 4]
- The ECB requires a small pavilion annex adjacent to the pitches that will provide:
  - 2 x team changing including showers to ECB specifications
  - provision for match officials to ECB specifications
  - toilet facilities
  - small lobby/waiting area (sufficient space for 2 x cricket teams to shelter during bad weather) with padding up area
  - kitchenette with hot drink preparation and fridge
  - covered veranda from where the batting team can spectate and wait to bat
  - storage space for stumps, scoreboards and kit.
- The playing field in Area X should be designed as a single platform to enable flexible marking out of pitches as required.
- An artificial wicket (known as a non-turf pitch or NTP), should be provided in addition to the relocated 9 grass wickets from Area A. This proposal is supported by the ECB and Sport England because it will help to meet the current and future needs of the OACC, particularly its junior sections and lower level senior teams. Its provision also provides for the expected demand for cricket from the North St Albans development.
- The RFU are content that the existing OASA pavilion is within an acceptable distance to the rugby pitches on Area X, and therefore additional changing rooms to the standards of the RFU are not required. However, access to toilets in the proposed pavilion annex would be welcomed, particularly for the junior players.
- Given its size and extensive facilities, the OASA wishes to retain the main social aspects of the various clubs in the existing pavilion. The OASA does not require, and wishes to avoid providing, a second bar/social space in the pavilion annex.

4.13. The 12<sup>th</sup> January meeting also covered the issue of the OASA lease for the replacement playing pitches. The jointly signed letter to Sport England by the Woollam Trust and the OASA (which was copied to the RFU, ECB and Herts Cricket Board) confirms that lease for

the replacement playing field area (Area X) will have the same terms and expiry as the remaining site (i.e. in the year 2252). A copy of this letter is provided in Appendix 7. The letter's attachments were the TGMS feasibility study (Appendix 4) including the plan for Area X, the pavilion annex design brief and plans (Appendix 8) and the Labosport ball strike report (Appendix 5).

- 4.14. A further issue raised at the meeting on 12th January 2024 was the need to demonstrate that the existing sports facilities, including playing fields and the OASA pavilion, had been taken into account in the design of the proposed residential development. Ball-strike, lighting and noise assessments have therefore been undertaken. It is clear that noise is not of concern, and that the ball-strike and lighting issues can be mitigated. The main findings of these reports are set out in Section 5 below.
- 4.15. Consideration has also been given to the potential implications of the existing pitches at the St Albans Girls School (STAGS), including its 3G AGP which has community use. The findings of the technical studies are provided in Section 6 below, with the conclusions that the proposed residential area will not be impacted by the STAGS site, either by noise or lighting.

## Policy test for replacement playing field

- 4.16. Sport England is the statutory consultee in relation to playing fields and their *Playing Fields Policy and Guidance (March 2018, updated December 2021)* provides both a summary of the legal definition of what constitutes a 'playing field' and their approach towards the protection of playing fields, including five Exceptions which may apply to the development of playing fields.
- 4.17. The applicant accepts that Area A is an existing playing field, and Exception 4 is the relevant test for the application. Note that the criteria for Exception 4 are echoed in the lease between OASA and St Albans School Woollam Trust:

*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.*

4.18. Accordance with the Sport England Exception 4 demonstrates that the requirements of NPPF para 104(b) are also met. It should be noted that para 104 has three separate ‘gateways’, and that the scheme only needs to meet one of them.

***NPPF para 104***

*Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

*a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*

*b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*

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

4.19. The detailed technical reports appended provide the information in relation to the “equivalent or better” tests for quantity and quality.

4.20. Each element of the Exception 4 test is considered in Table 2 below, and full accordance with the Exception 4 tests is demonstrated.

Table 2: Accordance with policy

Policy test	Existing playing field	Replacement playing field	Proposals meet Sport England Except 4 test/NPPF para 104(b) and dft Local Plan policy B1(4)																																								
Equivalent or better quality	<p>3 x rugby pitches and 1 x cricket:</p> <table border="1" data-bbox="436 742 1055 933"> <thead> <tr> <th>Direction of play (Length m.)</th> <th>Across play (Length m)</th> <th>Dead ball area (m)</th> <th>Safety Margins (m)</th> </tr> </thead> <tbody> <tr> <td>80</td> <td>60</td> <td>7</td> <td>5 (east), 3 (west)</td> </tr> <tr> <td>92</td> <td>65</td> <td>10</td> <td>5</td> </tr> <tr> <td>100</td> <td>70</td> <td>7</td> <td>5</td> </tr> <tr> <td colspan="4" style="text-align: center;">9 Pitch Cricket Square</td> </tr> </tbody> </table> <p>Smallest pitch safety margin on west side is too narrow.</p> <p>Ref: Appendix 4, Section 3.4, Table 3</p>	Direction of play (Length m.)	Across play (Length m)	Dead ball area (m)	Safety Margins (m)	80	60	7	5 (east), 3 (west)	92	65	10	5	100	70	7	5	9 Pitch Cricket Square				<p>3 x rugby pitches and 1 x cricket pitch with addition of 1 x non-turf wicket</p> <table border="1" data-bbox="1131 742 1868 933"> <thead> <tr> <th>Direction of play (Length m.)</th> <th>Across play (Length m)</th> <th>Dead ball area (m)</th> <th>Safety Margins (m)</th> </tr> </thead> <tbody> <tr> <td>82</td> <td>60</td> <td>10</td> <td>5</td> </tr> <tr> <td>100</td> <td>70</td> <td>10</td> <td>5</td> </tr> <tr> <td>95</td> <td>70</td> <td>10</td> <td>5</td> </tr> <tr> <td colspan="4" style="text-align: center;">9 Pitch Cricket Square</td> </tr> </tbody> </table> <p>The two smaller rugby pitches are larger, and each has 10m dead ball area. All have the recommended safety margins of 5m.</p> <p>Ref: Appendix 4, Section 3.4, Table 4</p>	Direction of play (Length m.)	Across play (Length m)	Dead ball area (m)	Safety Margins (m)	82	60	10	5	100	70	10	5	95	70	10	5	9 Pitch Cricket Square				✓
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	<p>Slopes and orientation within Sport England guidelines.</p> <p>Ref: Appendix 4, Section 3.5</p>	<p>Slopes and orientation within Sport England guidelines.</p> <p>Ref: Appendix 4, Section 3.5</p>	✓																																								

	<p>Agronomist assessment using Performance Quality Standards undertaken. Existing pitches meet PQA standards.</p> <p>Ref: Appendix 4, Section 3.11, Tables 7-10</p>	<p>Proposed pitch construction will deliver the equivalent quality, confirmed by the Equivalent Performance Assessment</p> <p>Ref: Appendix 4, Section 4.6</p>	✓
Equivalent or better quality (cont)	<p>No non-turf cricket pitch.</p> <p>Ref: Appendix 4, Section 3.4.1, Table 3</p>	<p>Addition of non-turf pitch to relocated 9 grass wickets delivers Playing Pitch &amp; Outdoor Sports Strategy recommendation (site ID 45, p60).</p> <p>Ref: Appendix 4, Section 3.12 4.6 table</p> <p>NTP increases the playing capacity of OASA cricket for juniors, and lower leagues by around 60 match equivalent sessions per season (based on Sport England Playing Pitch Strategy Guidance, 2013)</p>	✓
	<p>No adjacent pavilion/clubhouse space. OASA pavilion is approx 145m from centre of cricket square, and 157-190m from centre of rugby pitches.</p> <p>Cricket leagues restricted due to lack of adjacent pavilion with changing.</p> <p>Safeguarding issues due to distance to pavilion with its toilets.</p>	<p>Building will provide easily accessible toilet provision for all users, significantly improving safeguarding, and making site more attractive to all users.</p> <p>New pavilion annex meeting ECB requirements will enable higher level of cricket league matches to be hosted on the new cricket 2 pitch.</p> <p>Ref: Appendix 8 pavilion annex design statement</p>	✓
	<p>Parking</p> <p>Closest parking approx 104m, with main OASA parking about 192m, and overspill parking approx 300m walk from centre of cricket pitch Area A.</p>	<p>Parking</p> <p>Adjacent to playing field.</p> <p>Ref: PJA Drawing 05920-TR-A-101-P2</p>	✓

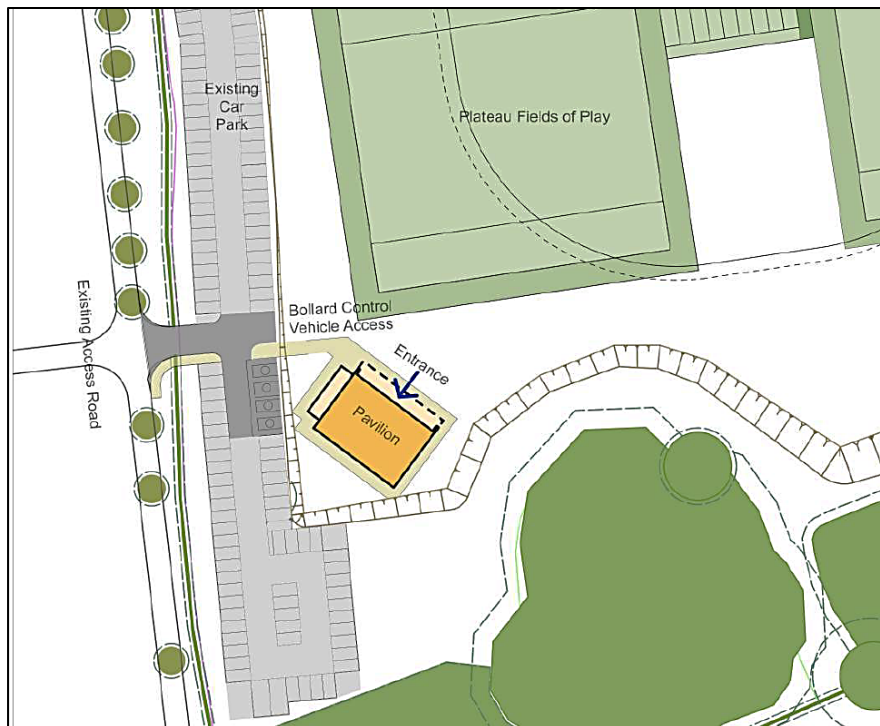
Equivalent or better quantity	3 x rugby pitches of varying sizes, but not all with correct safety margins 1 x cricket pitch with 9 grass wickets. Ref: Appendix 4, Section 3.4.1	3 x rugby pitches can be marked out at larger sizes, all with correct safety margins. 1 x cricket pitch with 9 grass wickets plus 1 x non-turf wicket. Ref: Appendix 4 para 3.12	✓
	The largest rugby pitch is exclusively used by Saracens RFC, so is not available for community rugby.	All pitches will become available for community use.	✓
	Usable natural turf area = 35,160 sqm. Ref: Appendix 4, Section 3.12 table	Usable natural turf area = 42,755sqm. This provides an increase in area of 7,595 sqm. Ref: Appendix 4, Section 3.12 table	✓
	No non-turf cricket pitch on site, restricting ability of cricket club to provide for juniors.	Provision of non-turf wicket will provide additional 60 match equivalent sessions for cricket, particularly providing for juniors and mid-week games. Ref: Sport England Playing Pitch Strategy Guidance calculations for NTP.	✓
In a suitable location	Part of the Old Albanian Sports Association site.	Still immediately adjacent to, and will become part of, the Old Albanian Sports Association site. Ref: Appendix 4, Section 3.12	✓
Subject to equivalent or better accessibility	Leased to Old Albanian Sports Association. Appendix 7	Leased to Old Albanian Sports Association on a new lease coterminous with the residue of the OASA site. Appendix 7	✓
Subject to equivalent or better management arrangements	Managed by the Old Albanian Sports Association. Appendix 7	Playing field pitches and pavilion annex managed by the Old Albanian Sports Association. No significant additional net management costs to OASA as both share of disposal receipt from Area A and higher levels of community use substantially offset pavilion annex costs. Appendix 7	✓



## Pavilion annex

- 4.21. The ECB has set out its minimum requirements and specifications for the pavilion annex on Area X, a position supported by Sport England (see Appendix 6, notes of the January 2024 meeting). The benefit of a small pavilion annex to rugby and all other potential users is also recognised.
- 4.22. The proposed pavilion annex is designed to meet the ECB technical requirements for changing and layout (ECB guidance note, Pavilions and Clubhouses [TS5]) whilst minimising the building footprint and potential visual impact. Its location also meets the ECB's technical requirements (p16 of the same guidance - TS5) being southwest of the cricket pitch. This location has the additional advantage of being screened by the spinney to the south, and mature hedge to the west.

*Figure 6: Location of proposed pavilion annex*



## Ball strike issues

- 4.23. The issue of potential ball strike has been considered by the appropriate specialists, Labosport. Their full report is provided as Appendix 5, and the summary is provided above in paras 4.8 and 4.9 and Figure 5.

## Visual impacts

4.24. Area X has been assessed for the visual impacts as part of the Landscape and Visual Impact Study, which is submitted separately with the application.

## Phasing

4.25. The policy requirement is that the replacement playing field area and pavilion annex (Area x) are operational prior to the loss of the existing playing field (Area A). The timeframes for construction are given in Appendix 4, Section 6 of the TGMS report. This has been taken into account in the overall phasing of the North St Albans development.

## Long term maintenance

4.26. The long term maintenance requirements of the replacement playing field area are addressed in the TGMS report, Appendix 4, Section 7 and 11. These are matters which the Woollam Trust and the OASA are fully aware of, and the implications have been taken into consideration in the proposals.

## Summary

4.27. The proposed replacement of the playing field Area A by new provision on Area X is fully in accordance with Sport England's Exception 4 test, and as such also meets the test of NPPF para 104(b) and the emerging policy of the Local Plan B1(4). It also satisfies the agreement between OASA and The St Albans School Woollam Trust.

4.28. The cricket natural grass wickets are replaced, and the additional capacity for cricket provided by the non-turf wicket (NTP) responds to the needs of the growing junior sections of the OACC. This will provide around 60 additional match equivalent sessions on the cricket pitch per year. The NTP can also be used by the lower senior cricket leagues. The provision of the NTP goes beyond the direct replacement, and is also justified by the development generated demand from the North St Albans development.

4.29. The rugby pitches on Area X are designed to meet the RFU recommendations and are larger in area than the existing pitches, with full run-offs.

4.30. There is an overall net increase in playing field area of 0.76 ha. The playing field will be on a single specially constructed and drained platform, enabling flexibility in the marking out of pitches to meet the changing needs of the OARFC over time.

4.31. The pavilion annex is a critical requirement of the ECB, a view supported by Sport England. This new provision will also help improve safeguarding measures for all users of the replacement playing fields over the current situation, as toilets are immediately accessible. The design takes into account social elements that will continue to be provided in the existing OASA main pavilion.

4.32. The new building will provide the minimum facilities required, keeping its bulk and footprint as small as possible, so minimising the impact on the Green Belt openness.

4.33. The pavilion is located to meet the technical requirements of the ECB, and occupies a site well screened by the spinney and mature hedges.

## 5. PROTECTING THE REMAINING OASA SITE

5.1. As Area A will be used for the development access and residential development, the applicant recognises that it is essential to protect the existing OASA sports uses, including both the pitches and the pavilion. Ball-strike, noise and lighting assessments have been undertaken, and the principal points from these technical reports follow.

### Noise

5.2. The technical report by Noise Consultants Ltd, Appendix 14.6 Woollam Park – Site Suitability Assessment addresses the noise arising from the OASA site. The conclusion is that the noise levels would be acceptable both from the pitches and pavilion. The residential development of North St Albans would not therefore jeopardise the existing uses of the OASA site.

5.3. The key sections relating to the pavilion use from the Appendix 14.6 are given below.

#### Para 1.7

*The retained and proposed Old Albanian RFC playing fields, in addition to the multi-use games area at St Albans School have been included in the assessment of external noise levels in combination with the transportation noise sources. The Old Albanian pavilion includes two bars with large balconies overlooking the pitches to the east and west of the pavilion. These bars are also used to host club events, parties and weddings. It is understood that the bars can be open until 2300 hrs Sunday to Thursday and midnight on Fridays and Saturday [based on the OASport website information]. A high-level assessment of the likely impact of event noise on the Proposed Development has been carried out.*

#### Para 2.16

*.... the assessment assumes a mobile disco creating an internal noise level of approximately 90 dB(A), that events run until midnight, there is negligible building envelope breakout from the north and south façades or roof of the building, the balcony doors on the east/west façade are fully open, and background noise levels measured at ML2 are representative of the nearest proposed residential dwellings.*

Para 4.19

*It is concluded that amplified music event noise at the Old Albanian Pavilion is unlikely to result in an adverse impact on the Proposed Development.*

5.4. In relation to the pitch use, Figure 4.4 of the same noise report Appendix (see Figure 7), shows the noise modelling results for road, rail and sports activities including proposed pitches and the existing pitches which bound the site. Pitches further away will have a negligible effect on the site and were therefore not included in the modelling. The target noise levels for gardens is to be within or below 50-55 dB LAeq,16hr. Notably the pitches are unlikely to be in continuous use for a whole 16 hour period represented here..... The pitch closest to Harpenden Lane, if assessed in isolation of any other noise source would unlikely increase levels above 55 dB within the residential site. In any case, the building massing and garden fencing in this area which would be designed to reduce road traffic noise levels would also reduce noise from the sports pitches.

*Figure 7: Amenity noise map*

**Figure 4.4: External Amenity Noise Map (LAeq,16h)**



**Note:**

4.30 The green and yellow areas in Figure 4.4 represent regions where the design target (50 dB LAeq,16hr) and upper guideline noise level (55 dB LAeq,16hr) are achieved without the need for noise mitigation. It should be noted that Figure 4.4 includes Sandridgebury Lane as a vehicle road link.

## Lighting

5.5. The Woollam Playing Fields External Lighting Report submitted with the application considers in detail the impact of the existing sports lighting of the retained OASA pitches, particularly the training pitch adjacent to the Harpenden Road, and the main match pitch. The recommendations are given on p7, Section 3.

*We note 3 recommendations as below to be considered.*

- 1 - *A suggested 3m hedgerow and/or a 3m fence would aid the glare from the adjacent 'training pitch. This would reduce vertical and horizontal illuminance between 3.31lux and 2.91lux. This improvement would enhance the comfort for the prospective residents during the times of the floodlights being on. This can be secured as part of the detailed landscaping scheme for a reserved matters planning application.*
- 2 - *SVM Brookbanks would also recommend that the orientation of the homes on the proposed A1 block of the development are positioned to avoid placing houses, ensuring kitchen/bedroom windows in direct sightlines to the floodlights. This detail can be secured as part of the reserved matters planning application for this phase of development.*
- 3 - *Should the above mitigation not be provided as part of any future detailed planning application, the replacement of floodlight heads from MHN-LA/FC metal halide to LED should be considered, this will improve the directional throw of the light and cut off from the fixture and give an improved efficiency.*

5.6. The options for the provision of the 3m hedgerow/fence, the orientation of the homes, or the provision of replacement floodlight heads will be issues to be addressed at the Reserved Matters stage. It is clear however, that appropriate mitigation measures will be able to reduce the lighting impact of the OASA retained pitches to an acceptable level.

## Ball strike

5.7. An assessment of the ball strike issues has been undertaken by Labosport. The pitch to be retained between the clubhouse and Harpenden Road, which is sports lit and used for training, will require ball strike mitigation. There are two options: either a 4.5m high ball stop fence between the pitch and the OASA access road, or a 4m high fence along the closest edge of the development, see Figure 8.

5.8. A Planning Condition is proposed to address this requirement.

Figure 8: Labosport ball strike recommendations for existing pitch



## 6. PROTECTING THE ST ALBANS GIRLS SCHOOL SITE PITCHES

- 6.1. The technical report by Noise Consultants Ltd, Appendix 14.6 Woollam Park – Site Suitability Assessment also included the impact of noise arising from the St Albans Girls School (STAGS) site, particularly the 3G AGP which has community use, see Figure 7. This confirms that there is no requirement for noise mitigation measures arising from the STAGS site.
- 6.2. The Woollam Playing Fields External Lighting Report considered the potential implications of the 3G AGP at the St Albans Girls School. It concludes in section 2.1 that *“the approved lighting design for the artificial sports pitch is expected to have no adverse impact on the proposed development.”*

## 7. MEETING THE SPORTS DEMAND FROM NORTH ST ALBANS

- 7.1. The North St Albans development, with its estimated population of 2,150 will generate a new demand for sports facilities.
- 7.2. In terms of any identified need for outdoor sport, cricket demand will be met by the new non turf (artificial) cricket pitch on Area X, and football demand will be met by contributions towards the nearby Willam Bird/Toulmin Drive Recreation Ground.
- 7.3. Discussions to date with Sport England (Roy Warren) and SADC's case officer have identified that in principle off-site contributions for football can be directed to the nearby William Bird/Toulmin Drive Recreation Ground (about a mile away), where SADC has a very high priority need to reinstate a pavilion, potentially along with some pitch improvements. SADC will undertake a feasibility study to further detail the works needed.
- 7.4. The contributions towards off-site sports provision, including towards football are expected to be based on the latest Sport England generic calculations using the North St Albans' expected population, potentially referring to the Sport England Sports Facilities Calculator and Playing Pitch Calculator.
- 7.5. Further discussions are to be held with SADC to consider any other justified investment into other built or outdoor sports facilities. If agreed, these would be off-site and likely secured via a s106 agreement.

## 8. CONCLUSIONS

- 8.1. Woollam Playing Fields is – and will continue to be - one of largest areas of playing field space in St Albans, and provides high quality facilities and used by large number of people.
- 8.2. Both the OASA and the school's site offer access for a range of community sport, with the OASA being the main provider for cricket and rugby, and the school for hockey as well as some cricket and rugby and other sports. This will continue with enhanced facilities offering greater capacity for sport: a larger playing field area; better quality pitches and extra capacity for cricket; a new pavilion annex; adjacent parking including for those with disabilities. The replacement playing fields are fully deliverable, confirmed by the technical reports.
- 8.3. Technical studies have also shown that the remaining OASA facilities will not be compromised by the proposed residential development.
- 8.4. Overall, these proposals constitute a betterment for sport, and they fully meet Sport England's Exception 4 tests, and NPPF para 104.
- 8.5. The new demand for sports facilities arising from the housing development is met by:

- The provision in Area X of a new non turf pitch (artificial cricket wicket) for community use
- Investment into William Bird/Toulmin Drive recreation Gound to meet football demand
- Other potential investment into off-site sports facilities to be agreed with SADC.