Introduction

Stoke Poges Task Force (SPTF) submits this representation in objection to planning application **PL/26/07779/FA** for the redevelopment of Farnham Park Playing Fields and South Buckinghamshire Golf Course.

SPTF supports investment in local sport and recreation and broadly welcomes the proposed improvements at Farnham Park Playing Fields. Our principal objection is not to those public-facing improvements, nor to Wycombe Wanderers Football Club or professional football. It concerns the proposed Performance Hub on South Buckinghamshire Golf Course.

The difficulty is that the Applicant has chosen to submit the FPPF improvements and the Performance Hub as a single package and expressly relies upon the former as part of the justification for the latter. SPTF cannot therefore support the application as submitted merely because it contains elements which we consider beneficial. We must assess the package against the harm caused by the Performance Hub and, for the reasons set out in this representation, object to the application as a whole.

That distinction is important. **SPTF does not argue that the FPPF improvements should not happen. We question why their delivery should require permission for a secured professional Performance Hub on protected public recreational Green Belt land.**

The application proposes to convert a substantial part of established public recreational Green Belt land into a secured professional football training campus principally serving WWFC's First Team and Academy. That development is then justified through a wider package of sporting, recreational, environmental and financial benefits.

The relevant planning question is therefore not whether the overall package contains worthwhile elements. It plainly does.

The question is:

Why must a secured professional Performance Hub of this scale — or any scale, for that matter — occupy this particular protected public recreational land, and do the public benefits which genuinely require it clearly outweigh the resulting Green Belt and other harms?

This representation examines that question through the Applicant's own evidence, the realistic planning baseline and the distinction between benefits genuinely caused by the Performance Hub and benefits which are independent of it, already secured, compensatory, mandatory or insufficiently defined.

For the reasons set out below, SPTF considers that the Applicant has not demonstrated the necessity claimed for the Performance Hub and that the Very Special Circumstances case falls substantially short of the required test.

SPTF therefore asks the decision-maker to refuse planning permission.

Throughout this representation, key points are followed where appropriate by **Required assessment** and **Decision required** statements. In colour copies these headings are shown in red for ease of navigation. They identify respectively the matters SPTF considers should be tested before determination and the conclusions which SPTF considers the evidence supports.

1. Need and Necessity: Why Category One, Why This Model, Why This Scale, Why Here?

1.1 The Applicant has demonstrated aspiration, not necessity

The proposed Performance Hub primarily serves the sporting and operational objectives of one professional football club. WWFC wishes to secure a permanent training base, achieve Category One Academy status, co-locate its First Team and Academy and provide facilities capable of supporting its long-term competitive ambitions.

Those are legitimate objectives. They are not automatically planning necessities.

This distinction matters because the proposal requires substantial change to established Green Belt recreational land. The decision-maker should distinguish between requirements imposed upon WWFC from outside and choices made by WWFC about how it wishes to operate.

Four questions should guide that assessment:

What external factor requires WWFC to have a Category One facility?

What external factor determines WWFC's operating model and preferences?

What external factor requires the proposed scale of training facilities?

What external factor requires any WWFC Performance Hub to occupy this protected recreational site?

These are not separate legal tests. Applicant-led sporting and commercial objectives can carry planning weight. But an Applicant's preferred business model should not acquire the weight of an externally established need merely because the Applicant describes it as necessary.

Required assessment: The decision-maker should distinguish throughout between externally established requirements, objectively demonstrated operational needs and WWFC's own sporting, commercial and operational preferences.

1.2 Category One is WWFC's strategic ambition

Category One is not required for WWFC to operate as a professional football club or maintain an elite youth Academy. Only around one third of Premier League and EFL clubs currently operate Category One academies.

The Applicant's own Case for Development states that Category One forms part of the new ownership's strategy to improve competitive performance and financial sustainability through player development and transfer value.

That evidence identifies the objective clearly: Category One is a sporting and commercial strategy chosen by WWFC.

Decision required: Category One should be treated as an Applicant-led sporting and commercial ambition, not as an externally imposed need. Its weight in the planning balance should reflect that distinction.

1.3 Full co-location is preferred, not demonstrated to be mandatory

The proposed operating model places the First Team and Academy together on one site. The advantages to WWFC are clear: shared facilities, operational efficiency, closer staff interaction and integration of player development.

The submitted material does not identify complete First Team and Academy co-location as a Category One requirement. Co-location is instead described as desirable and normal **"whenever possible"**.

WWFC presently operates from more than one location. Distributed operation is therefore an established reality, not a theoretical alternative.

Required assessment: The decision-maker should distinguish the operational advantages of complete co-location from any external requirement making it necessary. Sites or configurations should not be rejected solely because they do not accommodate WWFC's preferred fully integrated model unless that requirement is first justified.

1.4 The proposed scale is not established by Category One requirements

The Applicant identifies facilities associated with Category One, including sufficient pitches, indoor and artificial provision, goalkeeper facilities and appropriate medical, education and support accommodation.

The submitted material does not demonstrate an external requirement for:

- approximately 25 hectares;
- nine external pitches;
- the particular scale of the Performance Centre;
- substantial future flexibility or expansion capacity; or
- the complete proposed facility being accommodated on one site.

The distinction between **sufficient facilities** and **this amount of facility** is important.

The Applicant's own comparison material shows substantial variation in professional training-ground size and records the proposed WWFC training site at approximately **8.96 hectares**, while approximately **25 hectares** is nevertheless used as a site-search criterion.

The development history also demonstrates flexibility in the brief. The Performance Centre was initially envisaged at approximately 8,000 m² and was subsequently reduced substantially; the Design and Access Statement states that this was achieved without compromising operational functionality.

Required assessment: The Applicant should identify which elements of the proposed scale arise from external Category One or other objective requirements and which reflect WWFC's preferred level of provision, operational efficiency, flexibility or future-proofing.

Decision required: Applicant-defined preferences should not be treated as planning necessities merely because they form part of the chosen development brief.

1.5 The site-selection criteria are substantially Applicant-defined

The Environmental Statement assumes that a suitable site must provide approximately 25 hectares, accommodate First Team and Academy together, contain the associated facilities and infrastructure, satisfy WWFC's operational requirements and lie within Buckinghamshire.

Those criteria materially determine the outcome of the site search.

Marlow Road is rejected because it cannot accommodate the complete integrated model. Harlington is discounted partly because it lies outside Buckinghamshire and does not meet that model. Other sites are rejected against similar criteria.

No external football or Category One requirement has been identified which requires WWFC's training facilities to lie within Buckinghamshire.

A site should not become "necessary" simply because very few locations can accommodate every element of an Applicant-defined specification.

Required assessment: The decision-maker should distinguish genuine physical, regulatory and sporting constraints from geographical and operational preferences selected by WWFC.

The relevant question is not: **Which site can accommodate everything WWFC wants?**

It is: **What does WWFC genuinely require, and why must that requirement be met on this particular protected recreational site?**

1.6 The alternatives exercise does not adequately test the development brief

The Environmental Statement considers alternative locations and design iterations. The Hub was moved and refined in response to drainage, gas infrastructure, levels, trees, ecology and access constraints.

That exercise seeks to reduce impacts after the broad development brief has already been accepted.

It does not adequately test the brief itself.

No alternative identified by SPTF tests in combination:

- a materially smaller overall operation;
- fewer external pitches;
- partial rather than complete co-location;
- continued use of existing WWFC facilities;
- split-site operation; or
- a location outside Buckinghamshire.

The logic therefore risks becoming circular:

WWFC defines its preferred operating model → that model determines the required scale and site criteria → sites unable to accommodate it are rejected → the surviving site is presented as necessary.

The identification of smaller or distributed alternatives does not imply that a reduced Performance Hub at SBGC would necessarily be acceptable. Those alternatives are relevant because they test the Applicant's claim that the proposed development is unavoidable.

The more fundamental question remains why any secured professional WWFC campus should occupy this protected recreational land.

Decision required: The decision-maker should not accept a claim that SBGC is necessary where that conclusion depends upon Applicant-defined criteria whose own necessity has not first been demonstrated.

1.7 The Performance Hub is the catalyst for the wider package

The Applicant states that:

"The proposals very much come as a package with the Performance Hub providing the catalyst for the wider sporting improvements."

It further argues that those wider benefits would not otherwise come forward.

That wording identifies the Performance Hub as the central development around which the wider package has been assembled.

The wider improvements may constitute genuine planning benefits. Their inclusion does not, however, convert the Hub itself into an independently established public need.

A distinction is required between benefits which **cannot** be delivered without the Hub because of a demonstrated physical, contractual, operational or financial dependency and benefits which WWFC has **chosen not to deliver** unless permission for the Hub is granted.

The latter demonstrates commercial conditionality, not necessity.

Chapter 2 examines that additionality issue in detail.

Required assessment: Where a wider benefit is relied upon to justify the Performance Hub, the decision-maker should establish whether the benefit is genuinely dependent upon the Hub or merely packaged with it by the Applicant.

Decision required: The Applicant's description of the Hub as the "catalyst" should not itself be treated as evidence that the Hub represents an independently established public need.

1.8 Required conclusions on need and necessity

WWFC has demonstrated the advantages to it of a permanent integrated Category One training campus. It has not demonstrated that Category One, complete First Team and Academy co-location, the proposed scale, approximately 25 hectares, nine external pitches, a Buckinghamshire location or South Buckinghamshire Golf Course itself are externally required.

Required assessment: The decision-maker should address those distinctions expressly before attaching weight to claimed need or lack of alternatives.

Decision required: WWFC's chosen sporting ambition, operating model, facility specification and geographical preferences should not be allowed to combine sequentially until the resulting development appears unavoidable.

The Applicant has explained why WWFC wants this development. It has not demonstrated what requires it.

2. Correct Baseline and Additionality of Claimed Benefits

2.1 The Applicant uses the wrong counterfactual

The Applicant attributes substantial weight to investment, improved management, long-term stewardship and wider sporting and community benefits.

Those benefits must be assessed against the correct baseline.

The application repeatedly contrasts the proposal with the former Council-operated position, historic under-investment and an absence of future improvement. However, before this application was determined:

- the Council had already decided to replace its previous operating model;
- the Site had been marketed for a long-term lease;
- ten initial proposals had been received; and
- WWFC had been selected and had taken over operation of the Site.

Refusal of PL/26/07779/FA would therefore not recreate the former Council-operated position.

Decision required: The decision-maker should not assess the proposal against a counterfactual of continued Council operation, no investment and continued decline. The relevant baseline is the Site under a replacement operator without permission for the Performance Hub.

2.2 The existence of ten proposals undermines any “WWFC or failure” baseline

The Council received ten initial proposals through its leasing exercise.

SPTF does not ask the decision-maker to rerun that procurement exercise or determine that another bidder should have been selected.

The relevance is narrower. If credible alternative proposals could have secured continued recreation, professional management, investment or financial sustainability without comparable development harm, those outcomes cannot automatically be treated as benefits uniquely created by the WWFC Performance Hub.

Procurement success establishes that the Council preferred WWFC’s proposal as landlord or trustee. It does not establish that WWFC’s subsequent planning proposal is the only means by which the Site could have obtained sustainable management or investment.

Required assessment: Where long-term stewardship, investment or financial sustainability are relied upon as planning benefits, the decision-maker should distinguish benefits unique to PL/26/07779/FA from benefits capable of arising through another sustainable operating arrangement.

Decision required: The existence of alternative lease proposals means that refusal of the Performance Hub should not be equated with failure to secure a new operating model.

2.3 WWFC is already the operator

WWFC took over operation of the Site before determination of this application.

Some investment also commenced before permission was granted, including refurbishment of the golf clubhouse.

A benefit which has already occurred cannot logically be caused by a later grant of planning permission.

The same applies to maintenance, investment, management, recreational provision or other commitments which arise from the lease or from WWFC's role as operator irrespective of whether the Performance Hub is consented.

Required assessment: For each material claimed benefit, the decision-maker should establish whether it:

- has already been delivered or commenced;
- arises under the lease;
- would be delivered by WWFC as operator even if the Hub were refused; or
- genuinely depends upon PL/26/07779/FA.

Decision required: Benefits falling within the first three categories form part of the realistic baseline and should not be counted again as benefits generated by the planning permission.

2.4 The lease must be separated from the planning permission

The Planning Statement describes WWFC as having entered into a **75-year lease** on 24 August 2026 and attributes substantial weight to long-term stewardship.

The redacted lease subsequently disclosed to SPTF shows a visible contractual term ending in 2031. The provisions governing continuation or extension are redacted.

That creates two separate planning questions:

1. what long-term occupation and obligations are actually secured; and
2. which of those obligations depend upon permission for the Performance Hub.

If WWFC remains responsible for operating, maintaining or investing in the Site without the Hub, those outcomes arise from the lease rather than from planning permission.

Conversely, if particular lease rights, obligations or extensions are genuinely conditional upon permission, that dependency should be identified.

Required assessment: Before attaching weight to "75-year stewardship", the decision-maker should establish the planning-relevant duration and conditionality of the lease and identify which claimed benefits survive refusal of the Performance Hub.

Decision required: A property transaction completed before determination should not be treated as a benefit created by the subsequent grant of planning permission unless the relevant causal connection is demonstrated.

2.5 Restoration and deferred maintenance are not wholly new benefits

The Applicant relies upon the poor condition of parts of the Site and the need for investment.

Relevant parts of the Site are, however, charitable recreational land governed by the Eton Rural District Council Act 1971. The existing statutory regime required the transferred property to be maintained and managed for recreational purposes.

Where proposed expenditure remedies deterioration or deferred maintenance, the physical improvement is real. But it is not equivalent to creating a wholly new recreational benefit.

The appropriate distinction is between:

- ordinary maintenance and renewal;
- catch-up work required because maintenance or renewal was deferred; and
- genuinely additional facilities or improvements beyond the maintained baseline.

A degraded existing condition should not increase the apparent planning benefit of restoring assets which were already expected to be maintained.

Required assessment: The decision-maker should distinguish maintenance and recovery from deferred maintenance from genuinely additional investment.

Decision required: Restoration of existing recreational assets should not be given the same additionality weight as creation of genuinely new provision.

2.6 “Part of the package” does not establish dependency

The Applicant describes the Performance Hub as the **“catalyst”** for the wider sporting improvements and states that benefits would otherwise not come forward.

That assertion requires a causal test.

There is an important difference between:

- a benefit which physically cannot be delivered without the Hub;
- a benefit which cannot be financed without the Hub;
- a benefit which operationally depends upon the Hub;
- a benefit which contractually depends upon permission for the Hub; and
- a benefit which WWFC has simply chosen not to deliver unless the Hub is permitted.

Only the first four establish an actual dependency. The fifth establishes commercial conditionality.

The Applicant does not appear to explain whether the claimed dependency is financial. That is important because the Performance Hub appears to represent by far the largest capital element of the overall package. If the Hub were refused, most of that expenditure would no longer arise. It is therefore not self-evident that the materially smaller FPPF improvements would become unaffordable.

Putting separate elements within one red line and one planning application does not itself prove that one element depends upon another.

Required assessment: The Applicant should identify the basis of its statement that the wider benefits “would not be possible” without the Performance Hub and demonstrate whether the asserted dependency is physical, operational, contractual or financial. If financial dependency is relied upon, the Applicant should explain why refusal of what appears to be the dominant capital element of the overall scheme would prevent delivery of the materially smaller FPPF improvements.

Decision required: A benefit should not be treated as generated by the Performance Hub merely because WWFC has chosen to offer it only as part of the same package.

2.7 Mitigation, compensation and compliance must not be counted as independent benefits

Some measures relied upon positively arise because the development itself creates harm or because legislation requires them.

Examples include:

- replacement planting following tree removal;
- screening required to reduce landscape effects;
- access works required because existing routes conflict with the Hub;
- ecological mitigation;
- measures required to make the development acceptable; and
- the statutory minimum 10% Biodiversity Net Gain.

Such measures may reduce harm and may sometimes produce a residual improvement.

They are not equivalent to independent benefits which would exist without the development.

Required assessment: The decision-maker should distinguish genuine additional benefit from mitigation, compensation and mandatory compliance.

Decision required: Harm created by the proposal should not be offset twice by first reducing that harm through mitigation and then counting the same mitigation again at full weight as an independent positive benefit.

2.8 A simple benefit audit is required

The additionality question can be tested directly for each principal claimed benefit:

Claimed benefit	Question for the decision-maker
Long-term stewardship	Does it arise from the lease or from planning permission?
Relief of Council operating costs	Did this arise when operations transferred to WWFC?
Golf clubhouse refurbishment	Already delivered or committed independently?
Golf maintenance and continued operation	Existing lease/operator responsibility or new planning benefit?
Farnham Park improvements	Physical/financial dependency on the Hub or Applicant packaging?
Community Sports Hub / 3G / padel	Could these facilities be delivered independently?
Community use of Hub facilities	Direct Hub benefit, but what minimum provision is secured?
Golf reconfiguration	Independent improvement or compensation for land released to the Hub?
Public paths	Additional recreational benefit or principally mitigation for displaced access?
Tree and landscape planting	Independent enhancement or principally mitigation?
Biodiversity Net Gain	What exceeds mandatory requirements?
Permanent First Team / Academy base	Direct benefit of permission, principally to WWFC
Category One opportunity	Direct sporting benefit arising from WWFC's chosen strategy

Required assessment: The officer's report should identify the causal basis and additionality of each material benefit relied upon in the planning balance.

This exercise does not deny that the proposal contains benefits. It ensures that benefits arising for different reasons are not aggregated as though all were created by PL/26/07779/FA.

2.9 Required conclusions on baseline and additionality

The realistic baseline is a Site already transferred to a replacement operator under an executed lease, after a procurement exercise which attracted ten initial proposals. WWFC became operator and some investment commenced before determination; other claimed benefits arise from maintenance, mitigation, statutory requirements or lease obligations.

The decision-maker should therefore distinguish four categories: baseline and lease-related benefits; maintenance and restoration; mitigation, compensation and compliance; and genuinely additional benefits which would not arise without PL/26/07779/FA and whose dependency upon it is demonstrated.

Decision required: Only benefits genuinely attributable to PL/26/07779/FA should be given weight as benefits created by the proposal.

The relevant question is not whether the package contains benefits. It is which benefits this planning permission actually creates.

3. Loss of Golf, Open Space and Public Recreational Value

3.1 The policy test requires a genuine before-and-after comparison

The Applicant relies upon the policy exception allowing existing open space, sports and recreational land to be replaced where the benefits of the alternative provision clearly outweigh the loss of the existing use.

The relevant comparison is therefore not simply:

golf versus football, or
sport before versus more sport afterwards.

It is between the recreational and open-space value currently provided by the land and the public recreational value of what would replace it.

The existing position is an 18-hole public golf course within a mature open recreational landscape crossed by established public rights of way.

The proposed position includes a substantially reduced golf course and a large secured professional football training campus containing the Performance Centre, indoor pitch, numerous external pitches, goalkeeper areas, parking and associated infrastructure.

Required assessment: The decision-maker should compare the existing and proposed uses by reference to scale, accessibility, public availability, recreational character and actual likely use, not merely by counting sporting facilities.

Decision required: The fact that both the existing and proposed uses involve sport does not establish equivalent public recreational value.

3.2 The fundamental change is one of function and control

The scale of the proposal is important, but the underlying change is more fundamental.

Land which currently forms part of an established public recreational landscape would become a secured professional football environment principally serving WWFC's First Team and Academy.

The Applicant's own Statement of Community Involvement describes the Hub as:

"a secure training environment rather than a public leisure centre."

Access would be controlled and general public access excluded from the Hub itself.

That distinction would remain even if the Hub were reduced in size. A smaller professional campus would cause less quantitative loss, but it would still convert existing public recreational land into principally private professional use.

Decision required: The decision-maker should assess the proposal as a change in recreational function and public accessibility, not merely as the substitution of one sporting use for another.

3.3 The reduction in conventional golf provision is substantial

SPTF's measurements of the submitted plans indicate that land devoted to golf may reduce from approximately **41.5 hectares to 13.2 hectares** — a reduction of around 28 hectares, or 68%. These measurements are non-survey estimates and should be verified against the definitive plans.

The replacement golf provision is also materially different in character.

The proposed 12-hole main course measures approximately **1,805 metres / 1,974 yards**, averaging about **165 yards per hole**. The separate six-hole Academy Course totals only about **280 yards**, with holes of approximately 33–55 yards.

The Applicant's own Golf Needs Assessment distinguishes short and pitch-and-putt provision from standard golf and uses 1,500 yards as the minimum for a nine-hole "Standard" course. On a simple pro-rata basis, the proposed 12-hole course equates to approximately 1,481 yards per nine holes.

SPTF does not suggest that this creates a formal classification test for a 12-hole course. It does demonstrate the extent to which the proposed replacement differs from the established 18-hole provision.

A shorter course may process more separate customers because each customer uses it for less time. That is increased turnover, not necessarily increased recreational provision. Taken to its logical extreme, counting starts alone would imply that a one-hole course is superior because players could be cycled through it extremely quickly. Plainly that is not a meaningful measure of recreational benefit.

The relevant comparison is therefore the amount of recreational golf capable of being provided over a given period. On SPTF's indicative calculation, the existing course can accommodate approximately 30 groups simultaneously, compared with approximately 13 on the proposed layout. The proposed course therefore provides less than half the simultaneous golfing capacity. Any claim that this loss is offset by greater participation must demonstrate sufficiently greater actual utilisation, while recognising that each user receives a materially shorter golfing experience.

Required assessment: The decision-maker should assess replacement golf provision by its actual length, character and simultaneous recreational capacity, not merely by nominal hole count or the number of tee-time starts. Any claim that greater turnover compensates for reduced capacity should account for the materially shorter recreational experience provided to each user.

Decision required: The proposed course should not be treated as equivalent or enhanced golf provision unless the Applicant demonstrates that actual utilisation is sufficient to compensate for the reduction from approximately 30 groups to around 13 groups playing simultaneously. More starts on a shorter course demonstrate faster turnover, not by themselves equivalent recreational provision.

3.4 The Applicant's own Golf Needs Assessment does not support substantial loss of conventional golf

The Applicant presents the 12-hole model as an improvement in accessibility, flexibility and sustainability.

Its own Golf Needs Assessment records:

- local demand as **"strong and growing"**;
- participation at its highest level in a decade;
- club membership above national averages;

- a finely balanced supply-demand position; and
- that **"any significant loss of provision would tip this towards demand outweighing supply."**

The assessment identifies a relative shortage of flexible and entry-level golf provision.

That supports additional short-form golf.

It does not establish a surplus of conventional golf provision which should be removed.

The assessment itself describes shorter formats as provision which can **complement, rather than simply replace, traditional golf provision**.

Decision required: The decision-maker should not treat the Golf Needs Assessment as evidence that substantial reduction of the existing 18-hole course is required or beneficial. Its findings support complementary short-form provision, not the demonstrated need to remove conventional provision.

3.5 The golf reduction enables the Performance Hub

The Applicant's own documents explain the causal relationship.

The Environmental Statement states that the revised golf layout reduces the land required for golf, thereby enabling delivery of the football training facilities. The Design and Access Statement similarly explains that the reduced golf footprint allows the Performance Hub to occupy the south-eastern part of the course.

The 12-hole configuration is therefore not simply an independent golf-modernisation project.

It is also the mechanism by which land is released for the Performance Hub.

That does not prevent the new golf offer from having some benefits. It does mean that those benefits require independent evidence.

Required assessment: The decision-maker should distinguish genuine improvements to golf from changes required principally to release land for the Performance Hub.

Decision required: A reduction necessary to accommodate the principal development should not itself be treated as a planning benefit unless the claimed improvement in golf provision is independently demonstrated.

3.6 Chiddingfold should be tested against actual utilisation

The Applicant relies upon the experience of Chiddingfold Golf, which converted from 18 to 12 holes, in support of the proposed shorter-form model at SBGC.

SPTF is content for that comparison to be tested on its merits.

The relevant question is straightforward: **did conversion to 12 holes produce the increase in use which the Applicant suggests a shorter course can achieve?**

That question is particularly important because the proposed SBGC layout provides less than half the approximate simultaneous carrying capacity of the existing course. If that loss is to be presented as an overall recreational improvement, substantially higher actual utilisation would be required to compensate for it.

SPTF examined publicly visible online bookings at Chiddingfold and SBGC over the same period in August 2025. SBGC showed approximately three times as many booked tee times. When the different course formats were taken into account, the visible bookings represented approximately 4.35 times as many holes of golf at SBGC.

SPTF does not treat public booking screens as a substitute for audited utilisation data. They may not capture walk-ins and numbers of players for either course for example. They do, however, provide no obvious evidence of the very high utilisation which would be expected if the 12-hole model were capable of compensating for a major reduction in course capacity.

The appropriate evidence should be readily obtainable from Chiddingfold itself.

Required assessment: If Chiddingfold is relied upon as evidence that conversion to 12 holes increases accessibility, participation or utilisation, the decision-maker should request actual rounds-played and tee-utilisation statistics for Chiddingfold, including comparable figures before and after its conversion from 18 to 12 holes.

Those figures should establish whether the change produced a sustained increase in actual use and, if so, the scale of that increase.

Decision required: The Chiddingfold comparison should not be given positive weight as evidence that the proposed SBGC course will compensate for its reduced capacity unless the Applicant produces reliable utilisation data supporting that proposition. In particular, the decision-maker should not assume that SBGC use will more than double merely because a shorter round permits faster turnover.

3.7 Emerging evidence at SBGC should be examined

The planning application provides an unusual opportunity to test part of the Applicant's central golf proposition against actual behaviour.

WWFC announced the intended removal of six holes in February 2026. During 2025/26 annual rounds fell from 26,378 to 23,367, but that decline occurred after the future loss of the established 18-hole course had become public knowledge.

Evidence from the two independent golf clubs formerly based at SBGC shows their combined membership falling from approximately **350 to around 50**, while organised member golf reduced from approximately **80–100 rounds per week to around 12–15**.

Since late September 2026, the Site has also operated an interim 12-hole configuration. SPTF's repeated observations indicate light use, although the interim layout differs from the final proposal and should not be treated as a controlled experiment.

Definitive booking and rounds data should be available to the Council and WWFC.

Required assessment: Before attaching positive weight to claims that shorter golf will increase participation, the decision-maker should examine actual utilisation before and after the announced and implemented reduction, including rounds, tee utilisation and relevant user categories.

Decision required: Declining use after golfers were informed that the 18-hole course would be reduced should not itself be treated as evidence that the original facility lacked demand.

3.8 Community use of the Performance Hub is neither defined nor shown to require the Hub

The Applicant relies upon community use of parts of the Performance Hub as a recreational benefit.

Potential activities include junior football, women's and girls' football, disability football, walking football, schools, tournaments and community-club use.

Those activities could provide genuine public benefit.

Two separate questions arise.

First, the application does not presently establish the quantity or certainty of that benefit. It does not define:

- guaranteed weekly or annual community hours;
- which Hub facilities would be available;
- regular evening and weekend access;
- priority between WWFC and community users;
- pricing and affordability;
- local eligibility or priority; or
- remedies if expected community use is not delivered.

The Applicant has stated that detailed community-use and charging arrangements will be developed as the operational model progresses. Community access would therefore operate around the primary requirements of a secured professional training facility.

Second, the Applicant has not demonstrated **why the activities relied upon as community benefits need to take place within the Performance Hub at all**.

Farnham Park Playing Fields already contains three full-size football pitches and several smaller pitches. The application proposes a dedicated floodlit community 3G pitch and a new Community Sports Hub with improved changing and ancillary facilities.

Those are facilities designed for public and community sport.

By contrast, the Applicant expressly describes the Performance Hub as:

"a secure training environment rather than a public leisure centre."

If junior football, women's and girls' football, disability football, walking football, school activity or community-club training can be accommodated at FPPF or other community facilities, their inclusion in a future Hub Community Use Framework does not demonstrate an additional benefit which requires the secured Performance Hub.

The relevant question is therefore not simply:

Could community activities take place inside the Performance Hub?

It is:

What community activity requires access to the secured Performance Hub which cannot reasonably be provided through the dedicated community facilities at Farnham Park or elsewhere?

Required assessment: The decision-maker should identify what unmet community demand exists beyond the existing and proposed FPPF provision, which specific activities require access to the Performance Hub, how many additional community pitch-hours the Hub would provide, and why those activities cannot reasonably be delivered through the dedicated community facilities elsewhere.

Decision required: Community activities should not be attributed substantial weight as benefits of the Performance Hub merely because they could occasionally be accommodated there. Unless the Applicant demonstrates additional demand which specifically requires Hub facilities, such activity represents potential use of a private professional facility rather than a demonstrated need for that facility.

3.9 Public access must be assessed net of displacement

Existing public rights of way cross the golf-course landscape.

The secured Performance Hub is incompatible with those existing alignments. One route is proposed to be stopped up and another diverted around the Hub.

The Applicant also proposes new permissive routes and improved surfaces. Those may provide genuine benefits.

But the access balance has two sides:

new or improved routes may be provided, while existing access is simultaneously displaced from the land occupied by the Hub.

Access around a secure professional facility is not the same as access to the land which it occupies.

Nor is additional path length automatically an improvement where the replacement route is less direct or materially different in character.

The detailed PRoW consequences are addressed later in this objection.

Required assessment: The decision-maker should assess the statutory PRoW changes separately from the proposed permissive-path network. The diverted and stopped-up rights of way should be assessed by reference to their existing function, alignment, convenience and recreational character. The permissive paths should be assessed as additional recreational loops around the leased land, including their legal status, long-term availability and practical value.

Decision required: The proposed permissive paths should not be treated as replacements for the existing public rights of way or as restoring access lost through their diversion or stopping-up. They are additional circular routes within and around the leased land and do not provide equivalent access to an external destination.

3.10 Participation should be assessed on a net basis

The Site already supports substantial sporting and recreational activity.

Any claim of increased participation should therefore distinguish between:

- genuinely new participants;
- repeat activity by existing users;
- activity transferred from elsewhere;
- use displaced from existing facilities;
- golf participation lost through the reduction in provision; and
- community use already capable of being accommodated at Farnham Park.

The relevant question is not how many future activities could theoretically take place.

It is whether the proposal produces a **net increase in accessible and secured public recreational value**.

Required assessment: The decision-maker should avoid adding projected future users to the benefits case without accounting for displacement, transferred activity and loss of existing participation.

3.11 Required conclusions on recreational loss

The proposal makes two fundamental changes: a substantial part of an established public recreational landscape would become a secured professional football environment principally serving WWFC, while the remaining golf provision would be materially reduced in area, length and carrying capacity. SPTF's indicative comparison is approximately 30 groups playing simultaneously on the existing course against around 13 on the proposed layout.

The Applicant's Golf Needs Assessment records strong and growing demand and warns that significant loss would cause demand to exceed supply. Chiddingfold has not been supported by actual before-and-after utilisation data; Hub community use remains undefined and has not been shown to require the Hub; and the permissive paths are additional loops rather than replacements for the statutory routes affected.

Required assessment: The decision-maker should undertake a transparent before-and-after comparison of golf land, capacity and utilisation; the Chiddingfold evidence; secured community use and whether it requires the Hub; the public value of land transferred into secured professional use; and the separate PRoW and permissive-path effects.

Decision required: The alternative provision should not be found to clearly outweigh the existing recreational loss unless that comparison demonstrates a genuine net improvement in public recreational value. On the evidence presently available, it does not.

The proposal replaces substantial established public recreation with materially lower golf capacity and a principally private professional facility. Other sporting uses and possible community access do not, without evidence of equivalent or greater actual public benefit, establish an improvement.

4. Trees, Ecology and Landscape

4.1 The physical scale of tree loss is materially greater than the headline figure

The Planning Statement refers to the loss of approximately **203 trees**.

The Applicant's own Arboricultural Impact Assessment records removal of **204 individually recorded trees, 18 complete tree groups and parts of three further groups**.

Those tree groups contain multiple individual trees. SPTF's total of the Applicant's own group counts indicates approximately:

- 204 individually recorded trees;
- approximately 174 trees within wholly removed groups; and
- approximately 30 trees within partially removed groups.

The resulting physical loss is therefore approximately **408 individual trees**.

The precise number should be verified because group counts are themselves estimates. But the difference between approximately 203 and approximately 408 is too large to be dismissed as presentation.

Required assessment: The decision-maker should require a reconciled physical tree-loss figure distinguishing individually surveyed trees from trees contained within wholly and partly removed groups.

Decision required: The headline statement that approximately 203 trees are lost should not be relied upon as representing the total physical tree loss.

4.2 The tree loss is overwhelmingly caused by the Performance Hub

The AIA identifies only one tree removal at Farnham Park Playing Fields and states that no tree removal is required to achieve the proposed golf-course reconfiguration.

By contrast, the Performance Hub requires the removal of 203 individually recorded trees, 18 complete groups and parts of three further groups.

The arboricultural harm therefore arises overwhelmingly from the Performance Hub itself.

SPTF acknowledges that the proposal does not remove identified ancient or veteran trees or ancient woodland.

The issue is instead the loss of a substantial established parkland tree resource, including mature individual trees and groups with significant remaining life expectancy.

Decision required: The decision-maker should attribute the arboricultural harm to the development which causes it. Community improvements at Farnham Park should not obscure the fact that almost all of the tree loss is generated by the Performance Hub.

4.3 Replacement planting does not immediately replace the resource lost

The application places strong emphasis on approximately 2,400–2,500 replacement trees.

That numerical comparison requires caution.

Only around 150 of the proposed trees are specified as larger nursery stock. Much of the remaining planting consists of bare-root whips approximately **80–100 cm** high.

That is a conventional and legitimate method of creating future woodland.

But one 80–100 cm whip is not equivalent, at the time of planting, to an established 15–20 m tree with a mature crown.

The existing trees provide immediate:

- canopy and shade;
- landscape structure;
- screening and enclosure;
- deadwood and habitat complexity;
- mature visual character; and
- established ecological function.

Those functions would be removed immediately. Their replacement would arise gradually over decades.

The Applicant's own Environmental Statement recognises this temporal deficit by predicting significant adverse effects while the new landscape and habitats establish.

Required assessment: The decision-maker should assess replacement planting by future function and establishment time, not simply by comparing the number of trees removed with the number planted.

Decision required: The proposed planting numbers should not be treated as eliminating the immediate arboricultural and landscape harm caused by removal of the existing mature resource.

4.4 The Site already provides a direct test of mitigation deliverability

The previous 2023 padel permission required extensive ecological and landscape mitigation on this same Site.

The approved LEMP required **435 native saplings** in Areas C and D, together with long-term establishment, watering, mortality control, monitoring and remedial action.

The present Biodiversity Net Gain Assessment records that the previous woodland enhancement had **"not yet been realised"**.

SPTF's October 2026 field inspection identified approximately 54 apparently surviving planted trees within the designated Areas C and D and approximately 31 further planted trees outside them. Those observations require independent verification, but if broadly correct they indicate substantially lower establishment than envisaged by the approved LEMP.

The same earlier mitigation also included:

- enhancement of Area E grassland;
- long-term ecological monitoring; and
- eradication of Japanese knotweed from Area B.

The present application records that those earlier enhancements have not all followed their intended trajectory and that Japanese knotweed remains present.

This evidence is directly relevant to the present proposal because the current scheme relies upon a much larger programme of future planting, habitat creation and long-term management.

Required assessment: The decision-maker should establish what happened to the 2023 mitigation obligations, including establishment of Areas C and D, management of Area E, monitoring requirements and Japanese knotweed eradication, before relying heavily upon substantially larger future mitigation commitments.

Decision required: Previous under-delivery on the same Site should be treated as material evidence when assessing the certainty and weight of future landscape and ecological mitigation.

4.5 The headline BNG percentage does not establish the ecological benefit by itself

The Biodiversity Net Gain Assessment reports:

- **13.96% Habitat Unit gain**;
- **34.98% Hedgerow Unit gain**; and
- **10.22% Watercourse Unit gain**.

The statutory requirement is a minimum 10% gain.

The first 10% is therefore compliance with the statutory regime, not a voluntary ecological benefit offered in addition to what the development is legally required to achieve.

The margin above the statutory Habitat Unit minimum is also materially smaller than the headline 13.96% suggests.

The baseline is 312.17 Habitat Units. A 10% increase requires approximately 343.39 HU. The Applicant predicts 355.75 HU, leaving approximately **12.36 HU above the statutory minimum**.

Required assessment: The decision-maker should distinguish the statutory 10% minimum from the genuinely additional surplus above that requirement.

Decision required: The headline 13.96% BNG figure should not be treated as though the full percentage represents an exceptional additional environmental benefit.

4.6 The claimed Habitat Unit gain depends heavily upon future grassland creation

A particularly important component of the metric is the proposed creation of **6.5566 hectares of Other Neutral Grassland at Moderate condition**.

That single habitat category is credited with approximately **43.89 Habitat Units** — slightly more than the entire claimed net increase of approximately 43.57 HU.

The metric therefore depends materially upon future grassland being successfully created, managed and brought to the assumed condition.

The statutory metric applies temporal discounts. That correctly recognises that habitats take time to establish.

But a temporal multiplier does not guarantee successful delivery.

This distinction is particularly important in light of the Site's recent mitigation history.

Required assessment: The decision-maker should obtain independent ecological confirmation that the areas, condition targets and management assumptions underlying the claimed grassland units are realistic and deliverable.

Decision required: Predicted future Habitat Units should not be treated as equivalent to existing ecological value until the assumptions required to create them have been shown to be robust and enforceable.

4.7 The Watercourse Unit result has virtually no margin above the statutory minimum

The Watercourse Unit baseline is approximately **6.55 WU**.

The statutory 10% target is approximately **7.20 WU**.

The Applicant predicts approximately **7.22 WU**.

The claimed result therefore exceeds the statutory minimum by only approximately **0.014 WU**, or around **0.22 percentage points** above the required 10%.

That margin is extremely small.

Required assessment: The decision-maker should require the Watercourse Unit calculation and its assumptions to be independently checked before relying upon compliance.

Decision required: A predicted margin of approximately 0.014 WU should not be characterised as a material environmental benefit beyond statutory compliance.

4.8 Earlier mitigation obligations should not be repackaged as new benefits

The Applicant has correctly sought to avoid formal double-counting of some earlier mitigation within the statutory metric.

SPTF does not allege that the previous woodland obligations have simply been counted wholesale as new BNG.

However, avoiding mathematical double-counting does not resolve the wider planning issue.

If Japanese knotweed eradication, woodland establishment, grassland enhancement or other measures were already required under the 2023 permission, completing those obligations now is not a new environmental benefit generated by PL/26/07779/FA.

Required assessment: The decision-maker should identify which environmental measures arise from the present application and which remain outstanding from previous permissions or existing management obligations.

Decision required: Performance of an existing ecological obligation should not be counted again as a new benefit of the current proposal.

4.9 The Applicant's own LVIA predicts significant adverse landscape effects

The Landscape and Visual Impact Assessment does not conclude that the Performance Hub is harmless.

It predicts **Moderate Adverse (Significant)** landscape effects at Site level in the short and medium term and recognises that the Performance Hub is materially more intensive in landscape-character terms than the existing golf-course use.

The greatest visual effects are predicted for those closest to the development, including golf-course users and users of the public rights of way.

At Year 15, those effects reduce but do not disappear. The residual Site-level landscape effect remains **Minor Adverse**, as do effects for a number of nearby visual receptors.

The Applicant therefore relies upon mitigation to reduce significant adverse effects over time; it does not demonstrate that those effects are avoided.

Decision required: The decision-maker should recognise the Applicant's own finding that the Performance Hub causes significant adverse landscape effects and should carry those effects into the overall planning balance.

4.10 Significant landscape harm may persist for up to approximately 15 years

The LVIA defines its medium-term period as extending to approximately Year 15.

It predicts significant adverse effects throughout the short and medium term, after which the residual effect reduces to Minor Adverse.

Year 15 is therefore not the point at which the existing landscape has been restored.

It is merely the point at which the Applicant considers its mitigation sufficiently mature for the effect to become non-significant under its methodology.

The planting relied upon to achieve that transition includes extensive young whips and feathered stock. The LVIA itself acknowledges that establishment depends upon species, growing conditions, maintenance and other factors.

The description of these effects as "short" or "medium term" should not obscure their human significance.

A period of up to approximately 15 years represents a substantial part of a person's life. Some existing users of the Site will never experience the landscape after the significant adverse effects predicted by the Applicant have reduced. Children growing up locally may spend most or all of their childhood experiencing the altered landscape in that condition.

Conversely, the Applicant presents its occupation and stewardship of the Site as a very long-term arrangement. If that claimed long-term future is relied upon in the planning balance, the effects of the decision must also be viewed across generations, including people not yet born.

The planning consequence is therefore not adequately described as a temporary inconvenience followed by restoration. The loss of the established landscape occurs immediately; significant adverse effects may persist for around 15 years; and even at Year 15 the Applicant predicts residual adverse effects rather than restoration of the former landscape.

Required assessment: The decision-maker should give explicit weight to the duration of the landscape deficit and to the difference between future screening of the Hub and replacement of the mature landscape structure removed to create it.

Decision required: Harm lasting potentially up to approximately 15 years should not be dismissed as merely temporary where the development causes immediate removal of an established landscape resource and even the Year-15 residual effect remains adverse.

4.11 Visual containment does not remove landscape harm

The Applicant places weight upon existing woodland and new planting limiting wider views of the Performance Hub.

That may reduce visibility from surrounding settlements.

It does not remove the physical change within the Site.

The Hub introduces buildings, pitches, fencing, lighting and infrastructure into an established golf-course landscape. The Applicant's own LVIA identifies those internal landscape and visual effects as significant.

Screening can conceal development from particular viewpoints.

It cannot restore the spatial character of land occupied by permanent development, nor does a screened professional training campus become equivalent to the open recreational landscape which preceded it.

Decision required: The decision-maker should distinguish visual containment from preservation of landscape character. Limited visibility from outside the Site should not be treated as evidence that landscape harm within the Site is limited.

4.12 Floodlighting requires assessment as an internal landscape effect

The LVIA places the Site in a low-brightness E2 environment but excludes lighting from further landscape assessment because its effects would be "contained within the Site". That does not address the experience of receptors inside the Site — including golfers, walkers and PRoW users — who would encounter illuminated pitches, lighting columns and evening activity at close range. The separate lighting assessment principally addresses off-site obtrusive-light limits; it is not a substitute for assessing that perceptual change within the recreational landscape.

Required assessment: The decision-maker should ensure that night-time landscape and visual effects on on-site recreational receptors are assessed and that any operating hours relied upon are secured.

Decision required: Compliance with off-site light-spill limits should not be treated as establishing the absence of internal landscape harm.

4.13 The Year-15 photomontages should be available before reliance is placed upon them

The LVIA refers expressly to photomontage sheets:

- IN11486.01.002;
- IN11486.01.003; and
- IN11486.01.004.

These are stated to show existing conditions, completion and Year 15.

They have not been identified within the published application material reviewed by SPTF.

That omission is significant because Year 15 is the point at which the Applicant says significant adverse effects reduce to non-significant residual effects.

SPTF has raised this separately with the Planning Authority.

Required assessment: If those photomontages form part of the LVIA evidence, they should be published and available to the decision-maker and interested parties before reliance is placed upon the Year-15 conclusions.

Decision required: The reduction of landscape harm said to occur by Year 15 should not be accepted on the basis of visual material which has not been made available for scrutiny.

4.14 Required conclusions on environmental harm

The environmental case is not a numerical exchange of approximately 203 trees against 2,500 replacements or a headline 13.96% BNG figure. The evidence indicates approximately 408 physical trees lost on SPTF's calculation, immediate removal of an established parkland resource, previous site-specific mitigation which has not fully followed its intended trajectory, a BNG result heavily dependent on future habitat creation, virtually no Watercourse Unit margin above the statutory minimum, significant adverse landscape effects and residual adverse effects even at Year 15.

Required assessment: The decision-maker should assess immediate established losses against future, conditional and long-term mitigation, rather than as an instantaneous numerical exchange.

Decision required: Planting, BNG and landscape mitigation should reduce environmental harm only to the extent that successful delivery is evidenced, secured and realistically achievable; they should not be treated as eliminating the established harm created by the Performance Hub.

The proposal removes an established environmental resource now and relies substantially upon predicted future habitats and planting to compensate over time. The planning balance should reflect both sides of that chronology.

5. Green Belt and Very Special Circumstances

5.1 The applicable Green Belt test

The entire application site lies within the Metropolitan Green Belt.

The current National Planning Policy Framework, published in August 2026, applies to decision-making from the date of publication.

Policy GB6 states that development in the Green Belt is inappropriate unless it falls within one of the categories in GB7. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in Very Special Circumstances. Those circumstances do not exist unless the harm by reason of inappropriateness, together with any other harm resulting from the proposal, is clearly outweighed by other considerations. Substantial weight should be given to Green Belt harm, including harm to openness.

The Applicant accepts that significant elements of the proposal comprise inappropriate development and therefore require Very Special Circumstances.

The exercise is therefore not simply to identify a package containing substantial benefits. The decision-maker must:

- identify the Green Belt harm;
- identify all other harm;
- establish which claimed benefits are genuinely caused by the permission sought;
- determine the appropriate weight of each; and
- decide whether those considerations clearly outweigh the harms.

Required assessment: The VSC balance should be undertaken only after the harms and claimed benefits have been separately identified and appropriately weighted.

Decision required: Benefits should not acquire additional weight merely because they have been packaged together within one application.

5.2 The VSC test must not become a purchase mechanism for Green Belt development

There is a wider principle which should inform the assessment that follows.

WWFC is a private professional football club pursuing substantial sporting, operational and commercial objectives. There is nothing improper in that, and genuine public benefits associated with its proposals may properly carry planning weight.

But Green Belt protection would be materially weakened if a private operator could effectively secure permission for otherwise inappropriate development on protected recreational land simply by offering sufficient public benefits elsewhere within the same package.

The issue can be tested independently of the identity of the Applicant. If another private business proposed substantial buildings and infrastructure on the same Green Belt recreational land for its own operational purposes, while offering equivalent investment in public facilities elsewhere on the Site, those benefits would plainly be material considerations. They would not, however, by themselves establish why that private development needed to occupy this particular protected land.

Professional football should not escape that discipline merely because it is itself a sporting activity.

The danger is that the VSC exercise becomes transactional: the greater the private development sought, the larger the package of collateral public benefits offered to justify it. Taken far enough, Green Belt protection would cease to operate principally as a restraint on inappropriate development and instead become a price which sufficiently well-funded development could pay.

That is particularly important here because the Applicant expressly relies upon wider improvements outside the secured Performance Hub as part of its VSC case.

Required assessment: The decision-maker should distinguish benefits genuinely arising from and dependent upon the Performance Hub from wider benefits offered as part of the Applicant's overall package, and should consider whether those benefits demonstrate a need for this development on this Site or merely increase the attractiveness of the package as a whole.

Decision required: Public benefits should not be allowed to operate as a purchase price for inappropriate Green Belt development where the underlying necessity for the private development on the particular land has not first been demonstrated.

5.3 The VSC balance must endure for as long as the harm

There is also an important temporal dimension to the VSC balance.

The principal harms caused by the Performance Hub are not one-off events occurring when construction takes place. Once the development is implemented, the loss of Green Belt openness, conversion of public recreational land to secured professional use, loss of recreational flexibility and other permanent physical consequences will continue for as long as the Performance Hub remains.

The VSC balance, however, is struck only once: when planning permission is granted.

If a benefit relied upon at that point subsequently disappears, the planning permission is not automatically reconsidered and the Green Belt harm does not disappear with it.

That makes the **duration, certainty and enforceability of claimed benefits** fundamental to the weight which can safely be attached to them.

This does not mean that every planning benefit must endure for precisely the same period as every harm. Some one-off benefits may legitimately carry weight. But where an **ongoing public benefit** is relied upon materially to justify an **ongoing harm**, there should be substantial evidence that the benefit will itself continue for a commensurate period.

That issue is particularly relevant to claims concerning:

- community access to Performance Hub facilities;
- programming by WWFC or its Foundation;
- affordable or preferential community use;
- continued recreational provision;
- permissive walking routes;
- stewardship and maintenance commitments; and
- any other benefit dependent upon the future conduct, priorities or financial position of the operator.

Physical improvements at Farnham Park may themselves have considerable longevity once constructed. Operational commitments are different. A promise of community access today does not establish community access ten, twenty or fifty years from now.

The presently disclosed lease makes this issue particularly important. The visible term extends only to 2031, while the provisions governing longer continuation are redacted. The Applicant nevertheless relies heavily upon long-term stewardship and other continuing benefits.

If the Performance Hub is to create enduring Green Belt and recreational harm, but significant countervailing benefits are guaranteed only for a materially shorter or uncertain period, those benefits cannot safely be afforded the weight of permanent counterweights.

Required assessment: For each material benefit relied upon in the VSC balance, the decision-maker should identify whether it is one-off or continuing, the period for which it is secured, the mechanism by which it is enforceable, and what happens if the operator, ownership, lease arrangements or operational priorities change.

Decision required: Continuing public benefits should not be given long-term VSC weight unless their continuation is secured for a period reasonably commensurate with the enduring harm they are relied upon to outweigh. If the VSC case depends materially upon benefits whose duration is uncertain or substantially shorter than the life of the development, the required conclusion that the benefits clearly outweigh the harms cannot safely be reached.

5.4 Each inappropriate component must be separately identified and justified

The application contains several distinct elements which the Applicant itself accepts constitute inappropriate development in the Green Belt, including the Performance Centre, the indoor football pitch and the covered padel provision at Farnham Park.

The final Very Special Circumstances exercise may properly consider the proposal and its benefits as a whole. That does not, however, remove the need first to identify the individual elements of inappropriate development, understand the harm caused by each and examine why each particular element is required on this Green Belt Site.

Otherwise, substantial inappropriate development risks disappearing within the description of an overall sporting package.

For each significant component of inappropriate development, the decision-maker should therefore establish:

- what development is inappropriate;
- its scale and physical effect on the Green Belt;
- the Green Belt and other harm attributable to it;
- why that particular component is required on this Site;
- which claimed benefits genuinely depend upon or arise from it; and
- whether the wider proposal could proceed without it, or in a materially less harmful form.

This is particularly important in relation to the proposed indoor football pitch.

Policy GB7 provides a limited route for appropriate facilities for **outdoor sport**, subject to the separate tests concerning openness and Green Belt purposes. It does not provide a general exception for development merely because its purpose is sporting.

The indoor football pitch is not an ancillary building required to support outdoor recreation. It is itself a substantial enclosed indoor sporting facility.

The Applicant accordingly accepts that it constitutes inappropriate Green Belt development. At approximately 8,480 m² gross external area, it is also one of the largest individual built elements within the entire proposal.

Its sporting purpose does not remove the policy presumption against inappropriate development.

The relevant question is therefore not simply whether the overall WWFC proposal produces substantial sporting or community benefits. The decision-maker should ask specifically why an enclosed football facility of this scale must be constructed on this Green Belt recreational land, and what considerations are sufficiently connected with that particular development to contribute to the Very Special Circumstances necessary to justify it.

The same discipline applies to the Performance Centre and covered padel provision. Their inclusion within a wider application containing outdoor sport and public-facing improvements does not alter their status as inappropriate development.

Nor should the same public benefit acquire additional weight merely because several separate inappropriate elements are proposed. An improvement at Farnham Park Playing Fields is one benefit. It cannot logically become three separate counterweights merely because the application also contains a Performance Centre, an indoor football pitch and covered padel courts.

The correct exercise is therefore to identify the harm arising from each inappropriate component, add that harm to all other Green Belt and planning harm caused by the proposal, and then weigh the cumulative harm against the genuinely additional, attributable, secured and appropriately weighted benefits of the development only once.

This distinction also matters when considering whether all elements of the proposal are necessary. If an inappropriate component could be omitted without preventing delivery of substantial parts of the wider scheme or its public benefits, the case for accepting that component within the Green Belt requires correspondingly careful scrutiny.

Required assessment: The officer's report should identify separately the Performance Centre, indoor football pitch, covered padel provision and any other component found to constitute inappropriate development. For each, it should state the relevant Green Belt and other harm, the Applicant's justification for its inclusion on this Site, and the benefits said genuinely to depend upon it before undertaking the overall VSC balance.

Decision required: An overall package of benefits should not obscure the absence of demonstrated justification for an individual substantial element of inappropriate development. The same benefit should not be counted repeatedly as justification for several inappropriate components, and permission should not be granted unless the cumulative Green Belt and other harm is clearly outweighed by the properly attributable and appropriately weighted considerations relied upon as Very Special Circumstances.

5.5 The outdoor-sport exception must be applied to the development actually proposed

The Applicant relies upon the outdoor-sport exception in Policy GB7(f) to treat much of the external Performance Hub as development which is not inappropriate in the Green Belt.

That exception is conditional. It applies only where the impact upon Green Belt openness is **minimised** and there would be **no significant conflict with Green Belt purposes**. The fact that development serves outdoor sport does not, by itself, satisfy those requirements.

The Applicant nevertheless treats the external pitches, goalkeeper training areas and grids, spectator stand, fencing, parking, floodlighting and ancillary buildings as appropriate Green Belt development.

Those conclusions should be tested against the development actually proposed and the infrastructure reasonably required to operate it.

Scale is relevant to whether impact upon openness has been minimised

The Performance Hub contains nine external football pitches and goalkeeper training areas, together with extensive associated infrastructure.

There is no numerical limit in GB7(f) on the number of outdoor pitches which may constitute appropriate Green Belt development. The number and overall scale are nevertheless plainly relevant to whether the impact upon openness has been minimised.

Nine pitches occupy substantially more land than a smaller outdoor sporting facility and create correspondingly greater requirements for land engineering, drainage, circulation, parking, fencing, lighting, security and landscape treatment.

As Chapter 1 explains, the Applicant has not demonstrated that nine external pitches constitute an externally imposed Category One requirement. They form part of WWFC's chosen operating model.

The Applicant's own noise assessment adds to that question. It assumes that no more than 50% of the football pitches will be used simultaneously. The actual training schedule is stated not to be in the public domain and no specific operating scenarios were therefore modelled; instead all pitches were modelled and a 3 dB reduction applied to represent half being in use.

If only approximately half of the pitches are expected to be required simultaneously, the Applicant should explain why nine permanent external pitches are nevertheless necessary and why a smaller land take could not meet the operational requirement.

There may be legitimate reasons, including pitch rotation, surface recovery, different squad requirements and scheduling flexibility. Where the Applicant relies upon GB7(f), however, those reasons should be demonstrated rather than assumed.

Conversely, if restricted simultaneous use is material to the conclusion that noise effects are acceptable, the decision-maker should establish whether that limitation is intended to be enforceable.

In either case, limited simultaneous use does not reduce the permanent physical effect of providing all nine pitches.

The secure perimeter is part of the development

The external football pitches do not sit within an unrestricted recreational landscape. They form part of a secured professional training compound.

The hardscape drawings specify several different forms of boundary treatment. These include:

- a 1.8 metre high V-mesh security fence;
- a 1.8 metre high security gate;
- a 1.2 metre pitch-side railing; and
- a separately identified 4.5 metre high “3G Perimeter fence”.

The 4.5 metre fence specification appears in more than one of the submitted hardscape drawings.

However, the location and extent of that 4.5 metre treatment are not readily identifiable from the plans. Both 3G pitches appear to include additional boundary linework which does not clearly correspond with the line types explained in the boundary-treatment legend.

There is therefore uncertainty not about whether a 4.5 metre fencing treatment exists within the design vocabulary, but **where it is intended to be used and over what extent**.

The same uncertainty arises in relation to ball containment around the natural-grass pitches.

The Applicant's own front-cover visualisation in the *Case for the Development* depicts substantial high fencing or ball-stop structures around several grass pitches, including structures behind goals and between adjoining playing areas. It also depicts conspicuous high enclosure around the public 3G pitch at Farnham Park, while equivalent treatment around the Performance Hub 3G pitch is much less apparent.

The visualisation is not a technical specification. It nevertheless demonstrates that substantial ball-containment structures have been contemplated within the Applicant's own representation of the scheme.

Those structures are not clearly reconciled with the submitted hardscape legends and plans.

Privacy, ball containment and openness cannot be considered separately

The Design and Access Statement makes clear that the Performance Hub is intended to be a secure facility and that, for security and privacy reasons, public viewing of training sessions will not be permitted.

That requirement becomes particularly important beside the First Team pitches, where the diverted public right of way is proposed immediately outside the secured training area.

A 1.8 metre open-mesh security fence by itself would appear unlikely to achieve the stated visual privacy requirement.

The planting strategy provides buffer planting along parts of this boundary, but newly established vegetation cannot provide an immediate mature visual screen.

The boundary also has to perform a practical sporting function.

Even alongside the touchlines of full-size professional football pitches, balls will routinely travel above a 1.8 metre fence. Behind goals, the need for greater containment is more obvious. The Applicant's own visualisation appears to recognise that practical reality by depicting taller ball-stop structures.

The Council therefore needs to understand the complete intended relationship between:

- the 1.8 metre secure perimeter;
- any 4.5 metre fencing;
- pitch-side railings;
- ball-stop fencing or netting;
- planting and other visual screening;
- the First Team privacy requirement; and
- the adjacent diverted public right of way.

Those matters bear directly upon whether the external Performance Hub satisfies GB7(f).

A realistic and operationally complete scheme must be assessed now

Planning permission should be assessed by reference to a **realistic and operationally complete scheme**.

It would be unsatisfactory for relatively modest fencing and immature planting to be relied upon now when assessing Green Belt openness, only for substantially taller fencing, ball-stop netting, opaque screening or additional security measures later to be presented as unavoidable operational requirements after the principle of the Performance Hub has already been established.

SPTF does not suggest that the Applicant intends such a sequence.

The concern is that the need for those measures is already foreseeable from the nature of the proposed operation and, in the case of taller ball-stop structures, appears to be reflected in the Applicant's own visualisation.

If further fencing, netting, screening, bunding or other measures are reasonably required to make the professional training operation function safely and with the stated degree of privacy, they should be identified and assessed before determination.

Their effects are potentially material to:

- spatial and visual openness;
- landscape character;
- the sense of enclosure within the Green Belt;
- the experience of users of the diverted public right of way;
- views experienced by remaining golf users; and
- the assessment of whether GB7(f) is satisfied at all.

Screening also creates an important tension in the Applicant's case.

If the secured boundary remains visually permeable, the Applicant may rely upon that permeability when arguing that openness is preserved, but the stated requirement that public viewing of professional training should not occur becomes difficult to reconcile with it.

If visual privacy is instead achieved through dense planting, opaque screening or additional structures, those measures themselves reduce the experience of openness.

The Applicant cannot readily rely upon visual permeability of the boundary as evidence that Green Belt openness is preserved while simultaneously requiring that same boundary to prevent public viewing of training.

The outdoor-sport exception should therefore be applied to the **full external Performance Hub as it will realistically need to operate**, rather than to individual football pitches considered separately from the security, privacy, ball-containment and infrastructure necessary to make the professional training use function.

Required assessment: The decision-maker should assess the nine-pitch external Performance Hub cumulatively against GB7(f), including its overall land take, engineering works, parking, fencing, lighting, security requirements, activity, landscape treatment and all fencing, netting, screening and ball-containment infrastructure reasonably required for long-term operation. Before determination, the Applicant should identify clearly the location, height and extent of each boundary treatment shown in

the hardscape legends and confirm that the submitted drawings represent the complete operational fencing, privacy and ball-containment requirements of the Performance Hub.

Decision required: The outdoor-sport exception should not be applied merely because individual pitches constitute outdoor sport. Unless the decision-maker is satisfied that the impact upon openness of the realistically complete external Performance Hub has been minimised and that the development would not significantly conflict with Green Belt purposes, the relevant components cannot properly be treated as falling within GB7(f) and should instead enter the VSC balance as inappropriate development.

5.6 Openness is not determined simply by visibility from outside the Site

The Applicant accepts spatial harm from introducing built development onto open land but characterises the overall openness harm as limited, relying significantly upon existing woodland and proposed screening.

That requires care.

The Applicant's own LVIA identifies **Moderate Adverse (Significant)** landscape effects caused by the Performance Hub and recognises it as a materially more intensive landscape use than the existing golf course.

Existing woodland may limit views from surrounding settlements. That does not remove the physical occupation and transformation of Green Belt land within the Site.

Nor can future planting restore spatial openness occupied by buildings, roads, parking, fencing and other permanent infrastructure.

Screening may make development less visible.

It does not make the development absent.

Required assessment: Green Belt openness should be assessed in spatial as well as visual terms and from within the Site as well as from surrounding settlements.

Decision required: Existing and proposed screening should not be treated as demonstrating limited Green Belt harm merely because it restricts external views of the development.

5.7 The proposal requires scrutiny against the purpose of safeguarding the countryside from encroachment

The current Framework retains as one of the five Green Belt purposes the need to:

"Assist in safeguarding the countryside from encroachment."

The existing golf course is an extensive outdoor recreational landscape characterised by fairways, mature individual trees, tree groups and woodland.

The Performance Hub would replace a substantial part of that landscape with a secured professional training complex containing buildings, engineered pitches, roads, parking, lighting, fencing and associated infrastructure.

Both uses involve sport.

That does not make their physical character equivalent.

The relevant issue is whether the proposed intensity and form of development represent encroachment into land which is presently predominantly open.

Required assessment: The decision-maker should assess the change in physical character caused by the Performance Hub rather than treating the existing recreational use of the land as disposing of the encroachment question.

Decision required: The Green Belt assessment should expressly determine the degree of conflict, if any, with the purpose of safeguarding the countryside from encroachment.

5.8 All other identified harm belongs in the VSC balance

Policy GB6 expressly requires the decision-maker to consider Green Belt harm together with **"any other harm resulting from the proposed development."**

The preceding chapters identify relevant additional harms including:

- substantial reduction and alteration of conventional golf provision;
- reduction in simultaneous golfing capacity;
- conversion of publicly accessible recreational land into a secured professional environment;
- stopping-up and diversion of public rights of way;
- substantial established tree loss;
- ecological loss followed by long-term future habitat creation;
- significant adverse landscape effects;
- a potentially lengthy period before mitigation matures; and
- the long-term reduction in the Trustee's flexibility to adapt and use a substantial part of the charitable land for other public sporting and recreational purposes in accordance with the 1971 Act;

The latter is a distinct consequence of the proposal. The existing recreational land retains substantial flexibility for future adaptation to changing public sporting and recreational needs. Construction of a highly specialised, secured professional football campus would materially constrain that flexibility for the long term. That consequence belongs on the harm side of the balance even if the proposed use itself is ultimately considered compatible with the 1971 Act.

Those matters do not disappear from the VSC exercise merely because they have already been assessed under other policies.

Required assessment: The VSC balance should identify and carry forward the material harms established elsewhere in this representation, including the long-term reduction in the Trustee's ability to adapt the land to future public sporting and recreational needs.

Decision required: The positive considerations must clearly outweigh both Green Belt harm and the cumulative other harm caused by the proposal.

5.9 The Applicant's package does not establish dependency

The Applicant states that:

"The proposals very much come as a package with the Performance Hub providing the catalyst for the wider sporting improvements."

That explains how WWFC has chosen to structure its proposal.

It does not establish that every benefit elsewhere within the application site requires the Performance Hub in planning terms.

The Farnham Park package includes a replacement Community Sports Hub, a floodlit community 3G pitch, padel provision and other improvements.

No evidence identified by SPTF demonstrates that those facilities are physically or operationally incapable of being delivered without the Performance Hub.

There is an important distinction between:

benefits which cannot occur without the Performance Hub

and

benefits which WWFC chooses not to provide unless permission for the Performance Hub is granted.

The first may be properly attributable to the development.

The second reflects the Applicant's commercial packaging decision.

Required assessment: Each major claimed benefit should be tested for physical, operational, financial or contractual dependency upon the Performance Hub.

Decision required: The statement that the proposals form a package should not, without evidence of genuine dependency, cause otherwise independent benefits to be given full weight as justification for inappropriate Green Belt development.

5.10 Need for a permanent training facility is not the same as need for this development here

Chapter 1 shows that the claimed necessity for this Green Belt site depends materially upon Applicant-defined choices: Category One, full co-location, an approximately 25-hectare search area, a Buckinghamshire location and accommodation of the preferred model on one site. Those preferences cannot become Very Special Circumstances merely because they are then used to eliminate alternatives. Smaller or distributed alternatives test claimed inevitability; they do not imply that a smaller Hub at SBGC would be acceptable.

Required assessment: The decision-maker should distinguish externally imposed requirements from reasonable operational requirements and Applicant preferences when assessing claimed need and lack of alternatives.

Decision required: The Applicant should not be permitted to define its preferred development model, use that model to eliminate less harmful alternatives, and then rely upon the resulting absence of alternatives as evidence that this Green Belt development is necessary.

5.11 The correct baseline materially reduces the weight of several claimed benefits

Chapter 2 establishes that refusal would not return the Site to its former Council-operated position. WWFC became operator and the lease was completed before determination; the Council had already chosen a replacement operating model and received multiple proposals. Transfer of operational

responsibility, relief of Council costs, ordinary maintenance, some refurbishment, continued golf operation and aspects of Site management may therefore exist independently of permission.

Required assessment: Each claimed stewardship, financial and maintenance benefit should be tested against the realistic refusal scenario and the obligations already arising from the lease.

Decision required: Benefits which exist independently of planning permission should not be given full VSC weight as though they were generated by approval of the Performance Hub.

5.12 Community use of the Performance Hub requires both certainty and necessity

Community use of selected Hub facilities could provide genuine benefit, but it remains insufficiently defined and the Hub is expressly described as "a secure training environment rather than a public leisure centre". Farnham Park already contains substantial football provision and the application proposes a dedicated community 3G pitch and Community Sports Hub. Weight therefore depends both on what minimum community use is secured and on evidence that additional demand specifically requires access to the professional Hub.

Required assessment: The decision-maker should establish both the quantity of community use secured within the Hub and what additional demand specifically requires access to Hub facilities.

Decision required: Potential community use should receive weight only to the extent that it is secured, genuinely additional and dependent upon the Performance Hub.

5.13 Environmental measures require calibrated weight

Chapter 4 shows that several environmental measures are principally compliance or mitigation: the statutory 10% BNG minimum is mandatory; replacement and screen planting respond to development harm; habitat creation compensates for existing loss; and completion of earlier obligations is not a new benefit. Only demonstrably additional environmental enhancement should carry full positive weight.

Required assessment: Environmental measures should be separated into mandatory compliance, mitigation or compensation, fulfilment of existing obligations and genuinely additional enhancement.

Decision required: Development-generated mitigation should not be counted once as reducing harm and again at full weight as an independent VSC benefit.

5.14 Sporting and economic benefits should be characterised accurately

A permanent First Team and Academy base would plainly benefit WWFC.

Potential Category One status, improved player development, academy opportunities and better facilities are legitimate material considerations.

But the Applicant's own case links Category One to competitive performance, player development, transfer value and financial sustainability.

Those are substantially sporting and commercial benefits to a professional football club.

They are not entirely without planning weight.

They are also not equivalent to guaranteed public recreational benefits.

Likewise, construction employment, operational jobs and local spending may carry positive weight where evidenced. More contingent claims concerning promotion, investment, profile or future sporting success should be treated accordingly.

Required assessment: The decision-maker should distinguish direct public benefits from private sporting and commercial benefits and from contingent future outcomes.

Decision required: The weight given to each benefit should reflect its public reach, certainty, additionality and enforceability rather than treating all sporting and economic benefits as equivalent.

5.15 Long-term certainty creates long-term constraint as well as benefit

The Applicant places substantial reliance upon long-term stewardship of the Site.

The same time horizon must apply to the consequences of the development.

Approval of the Performance Hub would commit a substantial area of charitable recreational land to a highly specialised secured professional football campus supported by permanent buildings, pitches, roads, fencing, parking and infrastructure.

That materially reduces the range of realistic future recreational uses available on that part of the land.

The existing golf-course landscape remains physically capable, in principle, of adaptation to different forms of public sport and recreation.

Once developed as the Performance Hub, recovering that flexibility would require substantial removal, expenditure and disruption.

This is particularly relevant given the statutory purpose for which the Charity's land is held.

The point does not depend upon concluding here that the proposed use itself is unlawful under the 1971 Act. It is a separate planning consequence: approval creates long-term commitment to a highly specialised use and correspondingly reduces future recreational flexibility.

Required assessment: The decision-maker should consider the long-term constraint imposed upon the Charity's ability to adapt this land to future public sporting and recreational needs, alongside the long-term stewardship benefits relied upon by the Applicant.

Decision required: Permanence should not be counted only on the positive side of the balance. The same permanence which gives certainty to WWFC's investment also materially constrains future recreational options for the land.

5.16 Other football training grounds do not determine this application

The Applicant cites permissions for professional football training facilities including QPR, Millwall and Charlton Athletic. SPTF accepts that such developments can demonstrate Very Special Circumstances in appropriate cases. Each decision, however, turns on its own site, development, Green Belt and other harm, need, alternatives and public benefits. The examples demonstrate possibility, not inevitability.

Decision required: Previous permissions for professional football facilities should not substitute for carrying out the VSC balance required for this application and this Site.

5.17 The correct VSC balance

The Applicant's case depends substantially upon aggregation.

A permanent WWFC base, Category One aspirations, Farnham Park improvements, golf changes, community activity, environmental measures, investment, stewardship and economic effects are combined into a single positive case.

The decision-maker should instead ask what remains after the necessary distinctions are made.

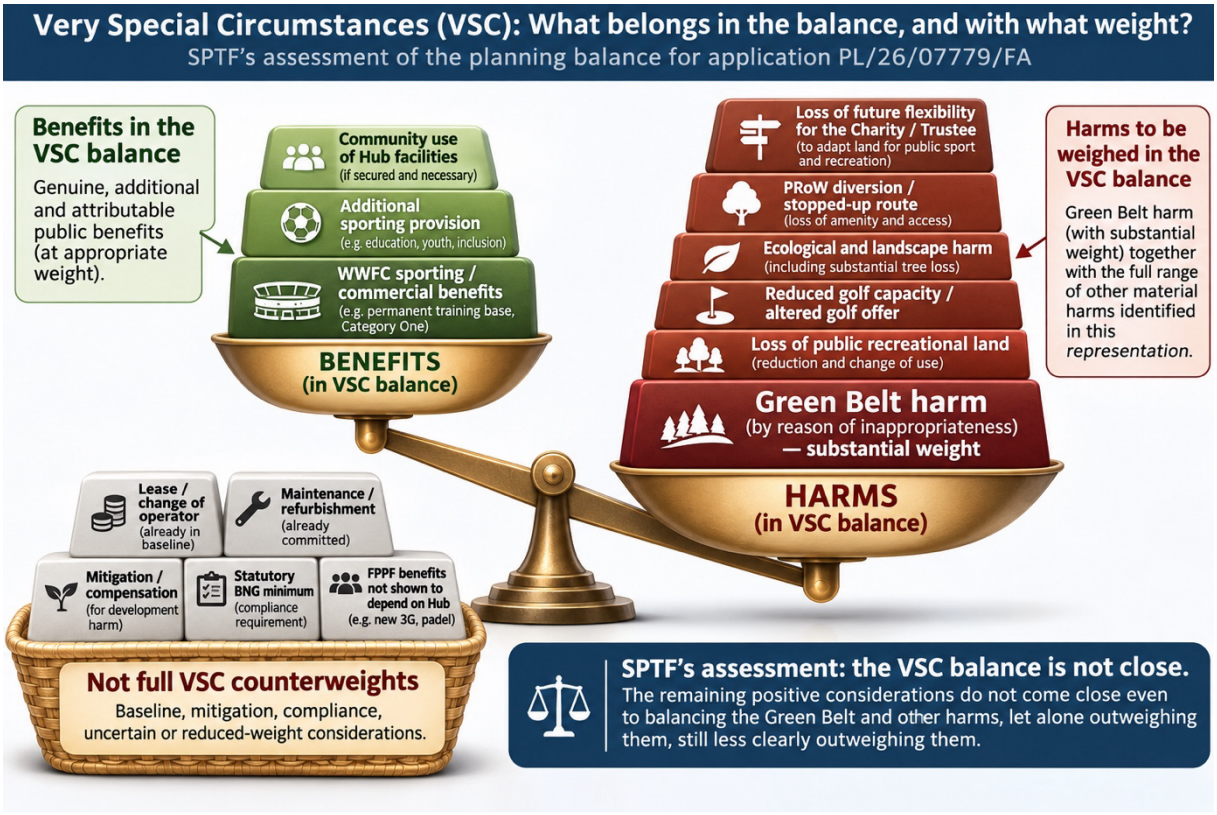
On the harm side are:

- Green Belt harm by reason of inappropriateness;
- spatial and visual openness harm;
- any conflict with Green Belt purposes;
- recreational loss;
- reduced golf capacity;
- conversion to secured professional use;
- tree loss;
- ecological harm;
- landscape harm; and
- other harms identified elsewhere in this representation.

On the positive side, genuine weight may attach to a permanent WWFC training base, improved sporting facilities, demonstrably additional public provision, securely guaranteed community use and genuine environmental enhancement.

But weight must be calibrated where benefits:

- arise under the existing lease or realistic baseline;
- are physically independent of the Performance Hub;
- represent maintenance or catch-up investment;
- compensate for harm caused by the development;
- satisfy mandatory requirements;
- fulfil previous obligations;
- remain undefined or unsecured;
- primarily benefit WWFC; or
- depend upon uncertain future outcomes.



SPTF's assessment of the VSC balance.
The graphic summarises the distinction developed in this chapter between harms which must be weighed in full, benefits which may legitimately count at appropriate weight, and considerations which are baseline, mitigation, compliance, uncertain or otherwise not full VSC counterweights.

Required assessment: The decision-maker should undertake the VSC balance only after those adjustments have been made and should state transparently the principal harms and benefits, their attribution and the weight given to each.

Decision required: The statutory test is not whether the proposal contains substantial benefits. It is whether the genuinely additional, attributable, secured and deliverable considerations **clearly outweigh** Green Belt harm, to which substantial weight should be given, together with all other harm.

On the evidence presently available, SPTF considers that the VSC case falls substantially short of the required test. This is not a case where the balance appears finely judged but insufficiently evidenced. Once proper account is taken of the correct baseline, the limited additionality and dependency of several claimed benefits, mandatory compliance and mitigation, the principally private benefits to WWFC, and the full range of Green Belt and other harms identified above, **the remaining positive considerations do not come close even to balancing those harms, let alone outweighing them, still less clearly outweighing them.**

WWFC has demonstrated why the overall package is attractive to it. There is no doubt about that.

The evidence does not demonstrate, however, that the public benefits which genuinely require the Performance Hub are sufficient to clearly outweigh the Green Belt and other harms caused by placing that Hub on this protected recreational land.

6. Transport, Accessibility and Public Rights of Way

6.1 The transport assessment is not limited to the “severe impact” test

SPTF does not presently contend that the Applicant’s highway modelling demonstrates a severe capacity impact in the NPPF sense.

That is not the end of the transport assessment.

Current national policy requires significant movement-generating development to be located where sustainable patterns of movement can be achieved, where the need to travel by private car can be limited and where users have a genuine choice of transport modes. It also requires reasonable future scenarios, including cumulative impacts, to be considered.

The relevant questions therefore include:

- whether the Performance Hub is sustainably accessible;
- whether the assumed travel behaviour is realistic;
- whether parking demand is robustly assessed;
- whether claimed growth in participation is consistent with the transport assumptions;
- whether cumulative traffic has been adequately tested; and
- whether the public-rights-of-way network is protected and enhanced.

Required assessment: The decision-maker should assess the transport strategy as a whole, not simply whether junction capacity crosses a severe-impact threshold.

Decision required: Absence of a severe highway-capacity impact does not establish that this is a sustainably accessible location or that the access consequences are acceptable.

6.2 The Performance Hub is predominantly car-dependent

The principal vehicular access to the Performance Hub is from Park Road.

The Applicant’s own Transport Assessment acknowledges that there is no footway at the golf-course access and does not expect pedestrians to enter the golf course or training ground from Park Road.

The Performance Hub itself includes 116 car-parking spaces, coach spaces, a controlled gatehouse and a widened access road designed for two-way traffic and large vehicles.

This is therefore a facility designed predominantly around vehicular arrival.

That may be operationally workable.

It should not be confused with a highly accessible location.

Decision required: The Performance Hub should be characterised accurately as a predominantly car-dependent destination in a relatively poorly connected Green Belt location.

6.3 Public-transport accessibility is weak

The Planning Statement describes the Site as being served by bus routes.

The Transport Assessment records the nearest relevant bus stops for the golf course and Performance Hub at approximately **1.0 km and 1.3 km walking distance**.

That is materially different from having convenient public transport immediately available to the Site.

The assessment also suggests that golf and football users are likely to have "a good level of fitness".

That is not an adequate answer to accessibility.

The claimed community benefits expressly extend to juniors, families, older people, disabled participants, beginners and other groups for whom a substantial additional walking leg may be important.

For golf users there is the further practical issue of carrying clubs, clothing and other equipment.

The Sustainability Statement's reliance upon minibuses, shared travel, coaches, taxis and private hire may mitigate individual car journeys, but it also illustrates the weakness of conventional public-transport accessibility.

Required assessment: The decision-maker should assess realistic door-to-door accessibility for the range of users relied upon in the benefits case, rather than treating the existence of bus services 1.0–1.3 km away as demonstrating good public-transport access.

Decision required: The Site should not be described as strongly accessible by public transport without evidence that those services provide a realistic alternative to car travel for the expected users.

6.4 The 12% active-travel assumption requires site-specific justification

The Transport Assessment applies a **12% active-travel mode share** to parts of the development.

That figure is not based upon observed travel behaviour at this Site. It is imported from another professional training facility in Ipswich.

Use of comparator data is not inherently unreasonable.

But its suitability matters where it directly affects predicted vehicle movements and parking demand.

Relevant differences include:

- no pedestrian access from the principal Park Road entrance;
- distant bus stops;
- limited cycle connectivity;
- academy travel involving children and parents;
- First Team and staff travel from a wide geographic area; and
- substantial evening use.

The Framework Travel Plan also makes clear that the 12% figure is assumed rather than observed, with actual mode share to be established only after occupation.

Required assessment: The Applicant should justify why the comparator is transferable to this Site and test the transport conclusions against a reasonable lower active-travel scenario.

Decision required: The assumed 12% active-travel share should not be treated as an established baseline.

6.5 The proposal generates substantial additional vehicle movements

The Transport Assessment predicts approximately **630 two-way vehicle movements on a weekday for the Performance Hub alone**.

Including the other proposed elements, the detailed assessment identifies approximately **857 additional two-way vehicle movements on a weekday** and **567 on a weekend day**.

Other application documents refer to materially different figures, including approximately 598 and 445 vehicle movements under different assessment measures.

The relationship between those figures is not sufficiently clear.

Traffic is also concentrated into pronounced arrival and departure periods associated with scheduled Academy and training activity.

That does not by itself establish a severe highway effect.

It does demonstrate that the proposed use represents a substantial intensification over the existing golf use.

Required assessment: The Applicant should reconcile the different headline trip figures and identify clearly which figures underpin the highway, environmental and parking assessments.

Decision required: The intensity and concentration of vehicle activity should be recognised as part of the permanent operational effect of the Performance Hub even if junction capacity remains within acceptable limits.

6.6 The junction modelling is not presently the principal objection, but the assumptions matter

The Applicant's modelling identifies some nearby junction arms already operating close to practical capacity thresholds.

SPTF does not presently rely upon the modelling as demonstrating a severe highway-capacity effect.

But where the network already operates under stress, the reliability of assumptions concerning:

- trip generation;
- active-travel share;
- vehicle mix;
- parking;
- overlapping activity; and
- cumulative development

becomes correspondingly more important.

Current policy TR6 expressly requires reasonable future scenarios, relevant times of day and potential cumulative impacts to be considered.

Required assessment: The highway conclusions should be sensitivity-tested against reasonable variations in the Applicant's central assumptions.

Decision required: A conclusion of no severe impact under one central scenario should not be treated as robust if reasonable alternative scenarios have not been tested.

6.7 Performance Hub parking depends upon spare golf parking

The Performance Hub contains **116 dedicated parking spaces**.

The Applicant's own parking assessment predicts approximately:

- **147 parked vehicles** during a weekday evening peak; and
- **167 parked vehicles** during a weekend peak.

The Transport Assessment therefore relies upon spare capacity in the adjoining golf-course car park to accommodate Hub demand.

That creates a direct operational dependency.

The Hub cannot accommodate its own predicted peak parking demand within its dedicated parking provision.

The assessment also appears not to include the additional parking demand generated by community use of the Performance Hub relied upon elsewhere as a planning benefit. The Performance Hub travel model is derived from First Team and Academy players, staff, parents/guardians and match spectators using WWFC's training and match schedule. If community use of the indoor pitch, show pitch or 3G pitch occurs alongside Club activity, that demand would be additional. If community use is intended only when sufficient Club activity and parking demand have ceased, the extent and timing of that constraint should be identified and reflected in the Community Use Agreement.

Required assessment: The decision-maker should require a combined peak-parking scenario covering WWFC operational activity, community use of Hub facilities and successful use of the retained golf facilities. The Applicant should also identify whether community-user parking has been included in the submitted demand model and, if not, how and when that demand will be accommodated.

Decision required: Reliance upon spare golf parking should be accepted only if the Applicant demonstrates that such spare capacity will actually exist when all proposed uses operate as claimed.

6.8 The golf-benefits case and transport case are internally inconsistent

The Applicant relies upon the proposed shorter-form golf offer as a means of broadening participation and attracting additional users.

The Transport Assessment, however, assumes **no net increase in golf travel demand**.

Those positions require reconciliation.

If golf participation materially increases, one would normally expect some corresponding increase in user trips, parking demand or both.

If no additional travel is expected, the decision-maker should understand how the claimed participation uplift is to occur.

The issue is particularly important because spare golf parking is simultaneously relied upon to accommodate overflow from the Performance Hub.

Required assessment: The Applicant should provide a coherent scenario linking predicted golf participation, rounds played, user numbers, trip generation and parking demand.

Decision required: The benefits case should not assume substantial growth in golf participation while the transport case assumes no consequential increase in travel or parking demand.

6.9 Cumulative traffic must reflect the planning pipeline at the time of decision

The surrounding highway network is shared by multiple existing, approved and proposed developments.

A series of individual schemes may each produce effects below a severe threshold while cumulatively consuming available network capacity.

That concern is particularly relevant where parts of the network already operate close to practical capacity.

Current policy expressly requires consideration of **potential cumulative impacts** and reasonable future scenarios.

The planning baseline is also dynamic.

If another material scheme is approved before this application is determined, it becomes part of the committed position. Conversely, approval of this development becomes relevant to subsequent applications.

Required assessment: The decision-maker should require a transparent and current cumulative assessment identifying which approved and live schemes have been included and testing reasonable combined-development scenarios.

Decision required: The application should not be determined on the basis of an outdated cumulative snapshot if the relevant development pipeline has materially changed.

6.10 The PRoW changes arise because public access conflicts with the secured Hub

Two existing public rights of way cross the affected golf-course landscape.

The proposal would divert **STP/26/1** around the Performance Hub and stop up **STP/27/2**.

The Applicant's documents explain the reason: unrestricted public access through the Performance Hub is incompatible with the privacy and security requirements of the First Team and Academy.

The causal sequence is therefore clear:

secure professional training facility → existing public routes become incompatible → public access is diverted or removed.

These changes are not principally improvements to deficient rights of way.

They are consequences of creating the secured Performance Hub.

Current policy TR8 requires development proposals to protect and enhance the PRoW network, including through suitable diversions.

A separate statutory process under section 257 of the Town and Country Planning Act 1990 is required to authorise stopping up or diversion where necessary to enable development to proceed.

Required assessment: The planning decision should assess the acceptability of a layout which requires one statutory route to be extinguished and another substantially diverted because unrestricted public access is incompatible with the proposed use.

Decision required: The route changes should be treated as development-generated harm or mitigation, not as independent accessibility benefits of the Performance Hub.

6.11 The diverted route is materially longer and different in character

The Sustainability Statement records that diversion of STP/26/1 adds approximately **546 metres** for pedestrians travelling west from West End Lane towards Parsonage Lane.

The Applicant also suggests that a longer route may provide health benefits.

That is not a satisfactory measure of accessibility.

A longer recreational circuit may sometimes be welcome.

A longer route between two destinations is less direct.

The diverted route would no longer pass through an open recreational landscape

The effect of the proposed diversion is not adequately described merely by comparing route length or surfacing.

The existing public right of way passes through an open recreational landscape. Users experience views across the golf course, mature trees and surrounding parkland on both sides of the route, without a continuous security boundary separating them from the land through which they are walking.

The proposed route is fundamentally different.

For a substantial part of its length it would run around the perimeter of the secured Performance Hub, including immediately beside the First Team training pitches. The Applicant's own operational case requires that this land be physically secured and that public viewing of training sessions should not be permitted.

That creates an important relationship between Green Belt openness, privacy and pedestrian amenity.

If views are retained through the proposed 1.8 metre mesh security fence and across the pitches, the Applicant's stated privacy requirement appears difficult to achieve. If those views are instead prevented by dense vegetation, additional screening, higher fencing or other physical measures, the experience of openness from the public right of way is correspondingly reduced.

The Applicant cannot readily rely upon visual permeability of the boundary as evidence that Green Belt openness is preserved while simultaneously relying upon that same boundary to provide visual privacy for professional training.

The likely operational requirements reinforce the point. The Applicant's own visualisation in the *Case for the Development* depicts substantial ball-stop structures around several training pitches. Those structures would remain visible above lower fencing or vegetation and would contribute to the perception of an enclosed sporting compound.

Nor is the effect purely visual. Users of the diverted route would be aware of the secured facility through the physical presence of the fence and screening, footballs and training activity behind it, voices, whistles and coaching instructions, lighting and other infrastructure. The route would therefore read as running **along the outside of a private professional training enclosure**, rather than through a continuous open recreational landscape.

This distinction can be illustrated by the Applicant's treatment of the existing public grass football pitches at Farnham Park Playing Fields. Those pitches are shown as open recreational areas without the extensive secure and privacy-driven perimeter proposed around the Performance Hub. The public 3G pitch is separately enclosed, but the submitted hardscape drawings do not clearly identify the precise fencing treatment.

The difference is therefore not between golf and football, nor between one sport and another. Outdoor football itself can sit comfortably within an open recreational landscape. The material change arises from the **encapsulation of the proposed professional training use within a controlled, secured and visually screened compound**.

That distinction is relevant both to the GB7(f) assessment and to the amenity of the diverted public right of way. Even if the Council concludes that the external pitches qualify as appropriate outdoor-sport development, that conclusion does not eliminate the separate harm caused to the character and recreational experience of the public route.

Required assessment: The decision-maker should assess the diverted route as an experienced landscape corridor, including the cumulative effect of security fencing, privacy screening, planting, ball-stop structures, lighting, sporting activity and the loss of views across land which is presently experienced as part of an open recreational landscape. The assessment should also reconcile the Applicant's reliance upon visually permeable fencing with its stated requirement that public viewing of professional training should not occur.

Decision required: Any conclusion that the Performance Hub preserves Green Belt openness should not be treated as establishing that the diverted public right of way preserves its existing amenity. The conversion from a route through open parkland to one running for a substantial distance alongside a secured and screened professional training compound constitutes a material change in recreational and landscape experience and should be weighed accordingly.

6.12 The permissive paths are additional recreational loops, not replacement PRoWs

The application proposes additional permissive paths around the leased land.

Those routes may provide genuine recreational benefit, particularly if they are well surfaced, maintained and available year-round.

They should, however, be characterised accurately.

They do **not** replace the stopped-up or diverted statutory routes.

Nor are they routes providing access to an external destination.

They are additional recreational loops around and through the remaining accessible land.

Their legal status is also different from that of a public right of way. A permissive route depends upon the terms under which access is granted and maintained.

The scale of any recreational benefit also depends upon likely use.

The application appears to place positive weight upon the creation of additional permissive walking routes, but the existence of a path does not itself establish the scale of the public benefit produced by it. That depends upon the number of people likely to use the route, the frequency of use and the recreational value of the journeys generated.

SPTF is not aware of any submitted pedestrian-demand assessment demonstrating likely utilisation of the proposed permissive paths.

That omission matters because the golf-course landscape is not equivalent to a destination such as a country park. It is reached principally on foot from surrounding routes and does not itself generate substantial destination-based pedestrian traffic.

SPTF members who have walked this part of the Site regularly over many years, particularly outside golfing hours, have generally observed very low levels of pedestrian use, often encountering no other walkers or only one or two during a visit. That remained broadly the case even during periods of the Covid restrictions when the golf course itself was closed and outdoor personal exercise remained permitted.

Those observations are not presented as formal pedestrian counts. They do, however, provide relevant local evidence against assuming that creation of additional permissive loops will automatically generate substantial new recreational use.

If material positive weight is to be attributed to those paths, the basis for the claimed benefit should therefore be demonstrated rather than inferred merely from the additional route length.

Required assessment: The decision-maker should establish what level of use of the proposed permissive paths is reasonably expected, what evidence supports that estimate, whether the routes are likely to attract genuinely additional walkers or principally redistribute existing walking activity, and how their likely utilisation compares with the existing recreational-access baseline.

Decision required: The permissive paths should receive positive weight according to their demonstrated likely use and secured quality, not simply according to their existence or aggregate length.

6.13 Required conclusions on transport and access

The Transport Assessment indicates that the surrounding highway network can probably accommodate the proposal without a severe capacity effect under its central assumptions. That does not establish sustainable accessibility or a net access improvement. The evidence instead shows a predominantly car-dependent Hub, bus stops around 1.0–1.3 km away, an assumed 12% active-travel share, substantial additional vehicle movements, Hub parking demand above its 116 dedicated spaces, reliance on spare golf parking, a golf-benefits case which predicts participation growth while the transport case assumes no increase in golf travel, and statutory PRoW changes driven by Hub security.

Required assessment: Before determination, the decision-maker should require the transport conclusions to be robust under realistic travel, parking and cumulative-development scenarios and should assess the PRoW changes as consequences of the secured Performance Hub rather than simply as part of an improved access package.

Decision required: The evidence does not presently establish a severe highway-capacity objection. It does establish substantial car-dependent intensification, parking and travel assumptions requiring reconciliation, and statutory public access materially altered to accommodate Hub security.

The transport case therefore does not demonstrate that the location is sustainably accessible or that the access outcome is a net improvement merely because the surrounding road network can absorb the predicted traffic.

7. Information Required Before Determination

7.1 Purpose of this chapter

The preceding chapters identify a number of factual uncertainties, inconsistencies and evidential gaps which materially affect the planning balance.

This chapter does not introduce new objections.

It consolidates the principal information which SPTF considers should be available to the decision-maker before the application is determined.

The purpose is straightforward: where a claimed benefit, mitigation measure, capacity assumption or finding of necessity materially affects the planning balance, it should be capable of being tested rather than assumed.

7.2 Consolidated information checklist

The following information would allow the principal claims and assumptions identified in Chapters 1–6 to be tested before determination:

Issue	Information required before determination
Need, baseline and lease	• Sufficient lease disclosure to verify continuation beyond the visible 2031 term and planning-relevant obligations; • A benefit/additionality schedule separating already-delivered, lease-related, refusal-baseline, mitigation/compliance and genuinely permission-dependent benefits; • Sufficient information on alternative lease proposals to test whether comparable benefits could have been secured with materially less harm; • Evidence distinguishing external Category One requirements from WWFC preferences, including the 25-hectare, co-location and Buckinghamshire criteria.
Community benefit	• A draft enforceable Community Use Agreement covering minimum hours, facilities, evenings/weekends, priority, pricing, local access, monitoring and remedies; • Evidence of unmet demand specifically requiring the secured Performance Hub rather than FPPF or other facilities; • Likely take-up and clarification of community-user travel and parking demand. • The duration of each continuing community commitment, whether it binds successors and what happens on a change of operator, ownership or lease arrangements.
Golf and recreation	• Verified course dimensions and evidence comparing existing and proposed simultaneous carrying capacity; • Historic and current SBGC rounds, bookings and utilisation, including the interim 12-hole period; • Actual Chiddingfold rounds-played and tee-utilisation data before and after its 18-to-12-hole conversion; • A net-participation assessment distinguishing new, repeat, transferred and displaced activity.
Trees, ecology and landscape	• A reconciled physical tree-loss schedule; • Independent verification of the 2023 mitigation obligations and any outstanding remedial work; • Independent scrutiny of Other Neutral Grassland assumptions and the very small Watercourse Unit margin; • Long-term establishment, replacement, monitoring and enforcement arrangements; • Publication of photomontages IN11486.01.002/.003/.004 with an opportunity for public scrutiny.
Green Belt and VSC	• Independent component-by-component assessment of appropriateness, openness and relevant Green Belt purposes;

Issue	Information required before determination
	• A transparent alternatives/site-selection account distinguishing external requirements from WWFC preferences; • A VSC benefit schedule separating baseline, lease commitments, mitigation, compliance, pre-existing obligations, unsecured aspirations, non-dependent benefits and principally private benefits; • Explicit consideration of the long-term reduction in the Trustee's future recreational flexibility. • Clarification of the location, height and extent of the 1.8 m and 4.5 m fencing treatments and all ball-stop netting, privacy screening and other boundary infrastructure reasonably required for an operationally complete Performance Hub.
Transport and public access	• Site-specific justification and lower-scenario sensitivity testing for the assumed 12% active-travel share; • Reconciliation of claimed golf participation growth with no assumed increase in golf travel; • A combined peak-parking scenario covering WWFC operations, community Hub use and successful retained golf use, including how demand above 116 Hub spaces is managed; • An up-to-date cumulative traffic assessment; • Full terms and likely utilisation evidence for permissive paths, details adjoining diverted STP/26/1, and confirmation that planning does not assume the later statutory PRoW process will necessarily succeed.

7.3 Publication and opportunity for comment

If additional material materially affects the claimed benefits, VSC case, lease/baseline, community use, golf demand, environmental mitigation, transport assumptions or another matter on which the decision-maker proposes to rely, SPTF asks that it be placed on the public planning file with a reasonable opportunity for review and comment. SPTF has separately requested at least 14 days for supplementary representations after the last requested material is published.

Decision required: The application should not be determined upon materially significant evidence which has not been available for meaningful public scrutiny.

7.4 Conclusion

These requests are not an evidential hurdle for its own sake. They concern propositions central to the planning balance: claimed necessity, golf improvement, Hub community benefit, future environmental compensation, workable transport and parking, and the existence of Very Special Circumstances. Those propositions are capable of being tested.

Where evidence is reasonably available, the decision-maker should obtain it rather than resolve material uncertainty in the Applicant's favour.

8. Overall Conclusion

SPTF does not dispute WWFC's wish for a permanent training base, Category One Academy status and improved sporting facilities. The question is whether those ambitions require this development on protected recreational Green Belt land and whether genuinely attributable benefits clearly outweigh the resulting harm. SPTF considers that they do not.

First, the Applicant largely presents its preferred sporting and commercial model as planning need. Category One, full co-location, facility scale, the approximately 25-hectare criterion and geographic search parameters arise substantially from WWFC choices and are then used to eliminate alternatives.

Second, the counterfactual is wrong for several claimed benefits: WWFC already holds the lease and operates the Site, while maintenance, restoration and other outcomes may arise without permission.

Third, the golf reconfiguration is presented as a benefit although the Applicant's own Golf Needs Assessment identifies strong and growing demand and warns against significant loss. The proposed layout reduces conventional provision and indicative simultaneous capacity from about 30 groups to around 13, while the Chiddingfold comparison lacks the utilisation evidence needed to show that greater turnover compensates for that loss. Fourth, several wider benefits have not been shown to require the Hub; others are mitigation, compliance, baseline outcomes or principally private WWFC benefits.

Those distinctions materially weaken the VSC case. Green Belt harm must receive substantial weight and all other harm must be added; only genuinely additional, attributable, secured and appropriately weighted considerations belong on the other side. Once those adjustments are made, SPTF considers that the balance is not close: the remaining positive considerations do not come close even to balancing the harms, let alone outweighing them, still less clearly outweighing them.

A further evidential limitation remains. The disclosed lease is heavily redacted, including material provisions governing continuation beyond the visible term and the long-term relationship between the Trustee and WWFC. That prevents full assessment of stewardship, additionality, permanence, future recreational flexibility and durability of public benefit. Uncertainty should not be resolved by assuming the Applicant's benefits at their highest possible value.

WWFC has demonstrated why the proposed package is attractive to it. There is no doubt about that.

It has not demonstrated why a secured professional Performance Hub of this scale — or any scale, for that matter — must occupy this protected public recreational land, nor that the public benefits which genuinely require the Hub come remotely close to clearly outweighing the Green Belt and other harms caused by it.

SPTF therefore asks the decision-maker to refuse planning permission for PL/26/07779/FA.