

OFFICER REPORT FOR COMMITTEE

DATE: 19/01/2022

**P/21/0693/FP
BROOKFIELD COMMUNITY SCHOOL**

**PARK GATE
AGENT: WESLEY BUGG**

CREATION OF 3G ARTIFICIAL GRASS PITCH (AGP) WITH PERIMETER FENCING, FLOODLIGHTING, MACADAM HARDSTANDING AREAS, STORAGE CONTAINER, & SOIL BUNDS

BROOKFIELD COMMUNITY SCHOOL, SARISBURY GREEN, SOUTHAMPTON, SO31 7DU

Report By

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1.0 Introduction

1.1 On 15th September 2021 the application was considered by the Planning Committee. The Committee resolved to defer the application on the following grounds:

“... to allow the school to undertake a public consultation on the plans and to try and resolve, by amendments to the application where appropriate, some of the concerns that have been raised to include:

- Noise impact and the accuracy of the assessment and conclusions within the submitted Noise Assessment;

- The use of micro plastic in the pitch construction, rubber crumb on its surface and the pitch lifecycle; and

- The siting of the pitch”.

1.2 On 15th November 2021 the applicant submitted the following documents:

- An updated Acoustic Survey;
- A list of independent research and reports (1998-2014) on Artificial Grass;
- A document on 3G Performance Infill Material;
- A Statement of Community Engagement

1.3 Public Consultation has been undertaken on these additional documents. Third party representations and comments received from consultees are set out in this report.

1.4 The following report is an updated and amended version of the Officers Report which was presented to the Planning Committee in September 2021.

- 1.5. The key relevant parts of this report which have been updated since the previous meeting and in light of the further comments received are:
- Impacts upon the Character and Appearance of the Area – specifically relevant to the siting of the pitch.
 - Noise;
 - Environmental impacts;
 - Health impacts; and

In addition, as a result of the reason for deferral, this report includes an additional section regarding Community Engagement.

2.0 Site Description

- 2.1 The application site comprises roughly one third of the school playing field concentrated on the north eastern side of the existing field with the site area extending towards the north, east and south east for access and the creation of soil bunds.

3.0 Description of Proposal

- 3.1 Permission is sought for a full sized 3G Artificial Grass Pitch (AGP) measuring 100 metres x 64 metres with perimeter fencing at 4.5m high, six floodlighting columns at 15m tall, macadam hardstanding areas, a storage container and soil bunds.

4.0 Policies

- 4.1 The following policies and guidance apply to this application:

National Planning Policy Framework (NPPF)
Planning Practice Guidance (PPG)

Adopted Fareham Borough Core Strategy

CS5 Transport Strategy and Infrastructure
CS14 Development Outside Settlements
CS17 High Quality Design
CS21 Protection and Provision of Open Space

Adopted Development Sites and Policies

DSP2 Environmental Impact
DSP3 Impact on Living Conditions
DSP8 New Leisure and Recreation Development Outside of the Defined Urban Settlement Boundaries
DSP10 Educational Facilities Outside of the Defined Urban Settlement Boundary
DSP13 Nature Conservation
DSP53 Sports Provision

Fareham Local Plan 2037:

Policy CC1 Climate Change

5.0 Relevant Planning History

5.1 The following planning history is relevant:

P/98/0164/CC	Enlarge Approved Games Area to a Multi-Use Games Area
HCC Approve	07/05/1998

6.0 Representations

6.1 **The first round of consultation was carried out on the application as originally submitted.**

Thirty seven representations of objection have been received, some are multiple letters from the same household and two are from outside of the Borough. The main reasons for the objections are set out below:

- Hours of use
- Noise
- Light pollution
- Parking in adjacent residential roads
- Visual impact
- Out of character with the area
- Anti-social language
- Environmental impact from 3G pitch material
- Impact on wildlife
- Inadequate boundary between school field and residential streets
- Concerns relating to damage and mess made during construction
- Migration of pitch material off site
- Health concerns relating to pitch material
- Not inclusive of other sports
- Strain put on other 3G pitches in the area
- No identified need for a new pitch in the area
- Loss of privacy from soil bunds
- Potential for unauthorised use and anti-social behaviour
- Dust pollution from increased height of soil bunds
- Increased traffic pollution

6.2 Thirty representations of support have been received. Some are multiple letters from the same household and four are from outside of the Borough.

- This will be a significant positive impact on the students at the school.
- Health and fitness benefits for the community.
- This would allow games to take place when the field would have poorly drained over the winter.
- Local teams don't have a facility like this and have to travel out of the area.

6.3 **One further representation was received between the publication of the Agenda for the meeting of the Planning Committee on 15th September**

2021 and the meeting being held. This was reported to the Planning Committee by written update. The details are reproduced here:

- It is disputed that there will not be an adverse impact on neighbours (para 8.49) as we can already hear sports activity on the pitches behind the site at less frequent hours of use.
- Changing operating hours clearly acknowledges this will be a noisy venture.
- The construction schedule gives Brookfield Gardens residents far more consideration than the AGP.
- The pitch is too close to residential homes. There is so much room between this school and Sarisbury Infants.
- I'd have no objection if Everyone Active had made the application as no residents would be affected.
- Brookfield Gardens slopes down from the school so the site is actually higher than the neighbours. 2m high bunds will not offset the intrusive lighting on 5m tall stanchions or the noise from sport.

6.5 The second round of consultation was carried out on the application in November and December 2021 following the deferral of the application by the Planning Committee:

Nine further objections were received from residents within Brookfield Gardens, Dene Close and Sherwood Gardens which raise the following concerns:

- Noise;
- Light pollution;
- Environmental impact remains although the information is helpful;
- Possibility of bunds being used for spectators to stand on;
- Errors and inaccuracies remain within the amended Noise Impact Assessment;
- Heath concerns relating to the pitch infill material;
- Unauthorised access to the site from existing inadequate fencing;
- Highway safety, parking and increase in traffic;
- Impact upon wildlife;
- Implications for groundwater drainage/ increased flooding;
- Does not comply with UK Government policy on climate change;
- Increase in dust from soil bunds;
- Increase in anti-social behaviour;
- Consultation carried out by the school is inadequate and didn't include enough people.
- The school has not shared any minutes of the consultation meeting undertaken and the Statement submitted doesn't reflect the conclusions taken from the meeting by residents.

7.0 Consultations

The comments below are a summary of all the comments provided through both rounds of consultation.

INTERNAL

Highways

7.1 No objection subject to condition

Ecology

7.2 No objection subject to condition

Environmental Health

7.3 No objection subject to condition

EXTERNAL

Sport England

7.4 No objection subject to condition

UK Health Security Agency (Formerly Public Health England)

7.5 Comments:

- Participating in sport and physical activity has significant health benefits, both physical and mental.
- However, it is also important that those taking part adopt basic hygiene practices.
- A European Chemicals Agency (ECHA) report published in 2017 stated that there was a very low level of concern when playing on artificial pitches that contain rubber crumb and ECHA note that they found no reason to advise people against playing sport on synthetic turf containing recycled rubber granules as infill material.
- ECHA recommended that people take basic hygiene measures when playing on those surfaces, as they would when playing sport on grass or any other surfaces
- UK Sports governing bodies have produced advice, guidance and materials for promoting good hygiene messages to people taking part in physical activity in consultation with Public Health England (now UKHSA).

7.6 UKHSA also directed the Planning Authority to further information on research still being undertaken by the ECHA on substances (other than PAHs - polycyclic aromatic hydrocarbons) in plastic and rubber granules and mulches used as infill on artificial pitches. It identified over 300 chemicals that could potentially be found in rubber infill and prioritised those that could potentially pose the greatest concern to human health and the environment. While the majority of substances evaluated were not considered to be a concern to human health. ECHA recommended that further assessments should be carried out on cobalt and zinc to establish whether there is a risk to human health from their presence in rubber infill that is not adequately controlled as the preliminary human health risk assessment.

7.8 In July 2021 The European Commission adopted a restriction of PAHs found in rubber granules and mulches used as infill on artificial sports pitches and playgrounds.

7.7 In addition, a proposal for a wide-ranging restriction on microplastics in products placed on the market in the EU is currently being considered by the European Commission to avoid or reduce their release to the environment. The restriction proposes two options to address the spreading of infill material from artificial pitches:

- 1) a ban on placing on the market after a transition period of six years; or
- 2) mandatory use of risk management measures (such as fences, brushes)

to prevent the loss of infill from the pitches after a transition period of three years. It is not yet known which option the Commission will present to the Member States nor what the final decision on the restriction will be. However, this decision could negate the need for further risk assessment of cobalt and zinc in artificial sports pitches.

8.0 Planning Considerations

8.1 The following matters represent the key material planning considerations which need to be assessed to determine the suitability of the development proposal. The key issues comprise:

- a) Principle of development
- b) Impact upon the character and appearance of the area
- c) Impact upon neighbouring properties:
 - *Noise*
 - *Lighting*
- d) Highways
- e) Ecology
- f) Community engagement
- g) Other matters:
 - *Existing school fencing*
 - *Health Concerns*
 - *Environmental Impacts*
 - *Disruption during construction*

a) Principle of development

8.2 The site is located within the countryside. Policy CS14: Development Outside Settlements states that:

“Built development on land outside the defined settlements will be strictly controlled to protect the countryside and coastline from development which would adversely affect its landscape character, appearance and function. Acceptable forms of development will include that essential for agriculture, forestry, horticulture and required infrastructure. The conversion of existing buildings will be favoured. Replacement buildings must reduce the impact of development and be grouped with other existing buildings, where possible. In coastal locations, development should not have an adverse impact on the special character of the coast when viewed from the land or water.”

8.3 The land is used for playing fields and educational purposes and so the use of the land is not proposing to change as a result of the development. The school site is within the defined countryside and there are specific policies (as discussed below) regarding the expansion of school sites in this location as well as the implications for sports pitch provision in the Borough. The design and siting of the proposed pitch and fencing is considered later in this report and as such, subject to these policy considerations, the proposal is considered to comply in principle with Policy CS14.

8.4 Policy CS21: Protection and Provision of Open Space states:

“The Borough Council will safeguard and enhance existing open spaces and establish networks of Green Infrastructure to add value to their wildlife and recreational functions Development which would result in the loss of or reduce the recreational value of open space, including public and private playing fields, allotments and informal open space will not be permitted, unless it is of poor quality, under-used, or has low potential for open space and a better quality replacement site is provided which is equivalent in terms of accessibility and size.”

8.5 The site is designated as open space, however, currently has limited availability to the general public and is mainly used by the school and its students. The proposal will enhance the space by allowing it to be used by the wider community outside of school use. Whilst the AGP will be located on an area of existing grass playing field, this facility will provide the ability for recreational use for the same sports, throughout the year and for longer period in the winter months.

8.6 The proposal is therefore, considered to comply with Policy CS21.

8.7 Policy DSP8: New Leisure and Recreation Development Outside of the Defined Urban Settlement Boundaries states:

“Proposals for leisure and recreation development outside of the defined urban settlement boundaries (as identified on the Policies Map) will be permitted, where they do not have an unacceptable adverse impact on the strategic and/or local road network and for main town centre uses:

- i. they meet the requirements of a sequential test; and*
- ii. subject to their scale, they meet the requirements of an impact assessment.*

Proposals for camping and/or caravanning outside of the defined urban settlement boundaries should have good access to services and facilities, and should not detract from views to and from the River Hamble, Fareham Creek, Portsmouth Harbour, or the Solent Way Coastal footpath.

Leisure and Recreation uses will not be permitted in the identified employment areas within the policy boundary for the Daedalus Airfield strategic

employment allocation.

Proposals should have particular regard to the requirements of Core Strategy Policy CS14: Development Outside Settlements, and Core Strategy Policy CS6: The Development Strategy. They should avoid the loss of significant trees, should not have an unacceptable impact on the amenity of residents, and should not result in unacceptable environmental or ecological impacts or detrimental impact on the character or landscape of the surrounding area.

New buildings should be well designed to respect the character of the area and, where possible, should be grouped with existing buildings.”

- 8.8 The proposed AGP is not considered to be a main town centre use and therefore a sequential test is not needed for this proposal. The community use of the facility outside of the school educational use however does ensure that the proposal needs consideration against this policy. The impact upon the local road network is discussed later in this report under the highways section.
- 8.9 The proposal does not result in the loss of any significant trees, is not considered to have an unacceptable impact on the amenity of residents (as discussed later in this report) and is considered to enhance the environment for local ecology on the site.
- 8.10 As such, the proposal is considered to comply, in principle, with Policy DSP8.
- 8.11 Also relevant to this proposal is policy DSP10 which facilitates the provision of new buildings, replacement buildings, conversion, and/or extensions to educational facilities outside of the defined urban settlement boundaries. Brookfield Community School is identified on the inset maps of the Local Plan as one such educational facility. The policy only allows such development providing that:
- i. They will be used for educational purposes or a use directly required to support the educational facility*
 - ii. They are of a suitable scale that is proportionate to the existing facilities on site*
 - iii. For new buildings, they are well designed to respect the character of the area and, where possible, should be grouped with existing buildings on site*
 - iv. They would not result in the loss of playing fields and/or sports pitches unless it can be demonstrated that these facilities are no longer required, or they can be adequately replaced elsewhere on site;*
 - v. They avoid building on the areas of the site that are at the highest risk of flooding, unless it can be demonstrated that the proposed development has an overriding need for the proposed location; and*
 - vi. It is demonstrated that sufficient parking spaces will be provided to meet the needs of any additional development and that there will be no unacceptable impact on traffic levels and parking in neighbouring areas.*
- 8.12 Furthermore, as is the case with policy DSP8, the policy cross refers to the Core Strategy policies CS6 and CS14 and requires such development to also

avoid the loss of significant trees, should not have an unacceptable impact on the amenity of residents, and should not result in unacceptable environmental or ecological impacts or detrimental impact on the character or landscape of the surrounding area.

- 8.13 The application sets out that the provision of the AGP will be for the use of the school during the school opening hours. Outside of educational hours the application indicates, and it is a requirement of the Sport England consultation response, that the pitch would be subject to a community use agreement to allow local sports clubs to hire the pitch for use. This would benefit local sports clubs but also provide additional income to the school. The first test of policy DSP10 is considered to be met.
- 8.14 Issues of scale and design are considered later in this report addressing criteria ii) and iii).
- 8.15 The impact on sport provision and pitch availability is considered below pursuant to the tests in policy DSP53 which in turn addresses criterion iv) of DSP10.
- 8.16 The site is outside of the Flood Zones two and three and is therefore not at a high risk of flooding and thus complies with the policy test v) of DSP10.
- 8.17 The parking and traffic impacts, neighbouring amenity assessment and the landscape impact is considered below. Subject to the consideration of these impacts the proposal is considered to be acceptable in principle when assessed against policy DSP10.
- 8.18 Policy DSP53: Sports Provision states:

“Proposals for new or extended sports facilities and pitches, will be permitted on sites within or adjoining the settlement boundaries provided they meet the following criteria:

- i. The proposal would be compatible with the character of the site and its surroundings*
- ii. The site is accessible by a variety of modes of transport, including walking and cycling, and the amount of traffic generated by the proposal could be accommodated on the local highway network without harming road safety*
- iii. The proposal would not be detrimental to the amenity of neighbouring residents by reason of undue noise or traffic; and*
- iv. A need for the facility has been established.*
- v. If the proposal is outside the urban area it accords with Policy DSP8: New Leisure and Recreation Development Outside of the defined Urban Settlement Boundaries.”*

- 8.19 The majority of the points within Policy DSP53 are discussed later in this report namely criteria i) Character impact, ii) transport impact, iii) neighbouring amenity and v) compliance with policy DSP8. Consideration of the proposal

against criterion iv) the need for the facility is set out below.

- 8.20 Fareham's Playing Pitch Strategy Update is a part of Fareham's emerging Local Plan. The strategy identifies that Fareham has an undersupply of five 3G pitches currently and six pitches to meet future demand and that demand is particularly high in Portchester and the Western Wards.
- 8.21 Brookfield Community School is identified as a site for a pitch within the western wards. The Strategy states that at least one pitch in each area of the Borough should be targeted and all pitches should be included on the Football Association (FA) 3G pitch register and are therefore, able to accommodate competitive fixtures.
- 8.22 It is recommended in the Strategy that potential sites are prioritised on how deliverable they are, as well as where the greatest need for the facility is. The study states that whilst the loss of grass playing fields should be minimised, the additional capacity that will be generated by the creation of the 3G pitches is essential in meeting demand across Fareham.
- 8.23 Therefore, there is an identified need for a full sized 3G all-weather pitch within the Borough and within the western wards in particular with Brookfield Community School being identified as a potential site.
- 8.24 In addition to this Council's Playing Pitch Strategy, Sport England were consulted during the course of the application. In their initial response they stated that the proposal results in significant benefits which responds to an identified need within the Borough. However, they noted that the proposal would encroach onto the existing cricket pitch and requested that the site plan be amended to show how the cricket pitch will be retained.
- 8.25 An amended site plan was submitted relocating the cricket pitch to allow its retention. Sport England have responded stating that they have no objection to the amended plan, however, they have requested a condition be added that a community use agreement is provided prior to the use of the pitch.
- 8.26 For the reasons given above, there is a recognised need for this type of facility and the proposal is considered to comply with part iv) of Policy DSP53.
- 8.27 Taking all of these policies in the round, the proposal is considered, in principle, to be an acceptable form of development subject to the other material considerations as set out in the remaining parts of this report.

b) Impact upon the character and appearance of the area

- 8.28 Policy CS17 of the Local Plan Part 1 states:

"All development, buildings and spaces will be of a high quality of design and be safe and easily accessed by all members of the community. Proposals will need to demonstrate adherence to the principles of urban design and

sustainability to help create quality places. In particular development will be designed to:

- respond positively to and be respectful of the key characteristics of the area, including heritage assets, landscape, scale, form, spaciousness and use of external materials,*
- provide continuity of built form, a sense of enclosure with active frontages to the street and safety of the public realm,*
- ensure permeable movement patterns and connections to local services, community facilities, jobs and shops,*
- create a sense of identity and distinctiveness and one that is legible,*
- enable and/or encourage a mix of uses and diversity in an area,*
- ensure that the public realm has pedestrian priority, is safe, secure, functional and accessible, and is constructed of quality materials and well maintained,*
- enable buildings to provide flexible accommodation, which can be adapted to suit all members of a community throughout their lifetime,*
- provide green infrastructure, including landscaping, open spaces, greenways and trees within the public realm, and*
- provide appropriate parking for intended uses taking account of the accessibility and context of a development and tackling climate change.”*

- 8.29 The proposal is situated on the existing playing fields to the north east of the school buildings which by its very nature is a flat and open area, however the location is also positioned close to the school buildings to ensure that the built form is clustered together as much as is possible.
- 8.30 Regarding the siting of the proposed pitch, the application now sets out that other sites within the school grounds were considered. Locating the proposal nearer to the Holly Hill Leisure Centre, with access and parking from the leisure centre would, the applicant considers, cause an issue with parking at the leisure centre and also encourage users to jump the fence to gain access. Officers note that the leisure centre is outside of the school ownership.
- 8.31 Locating the proposed pitch closer to Sherwood Gardens would give rise to noise impacts to those properties, as there is no bunding or noise mitigation. Furthermore, the application sets out that the further the pitch is sited from the existing campus of buildings means that there would be more infrastructure to service the facility such as power, lighting and the laying of access pathways.
- 8.32 Finally, the submission sets out that the school playing field is also laid out to provide two grass football pitches and a rugby pitch, the cricket wicket, two long jumps pits and training grids.
- 8.33 Within the Community Engagement Statement, it is the applicant's view, that despite setting out these points at the meeting, the neighbours to the school continue to express concern at the position of the pitch relative to neighbouring houses.

- 8.34 The proposal will be mostly visible from within Brookfield Gardens, Sherwood Gardens, Holly Hill Leisure Centre and from the school site.
- 8.35 The boundary with Brookfield Gardens which is closest to the site is tree lined, however, the proposal will be visible from the ground level between the gaps in the trees given the open mesh fencing of the school boundary.
- 8.36 The proposed fencing surrounding the proposed pitch will be finished in a dark green colour and will be 4.5m high. The dark green of the fences is considered to be acceptable and would reflect the colour palette surrounding the site with the remaining grassed area of the field and softer boundary treatments.
- 8.37 The proposal includes six 15-metre-high flood light columns; one on each corner and two on the halfway line. These are to be constructed from galvanized steel in a slim profile. The slim profile and the finish are not considered to result in a negative impact upon the character and appearance of the area and furthermore it is noted that within the Leisure Centre site to the immediate north of the school the footpath network is lit.
- 8.38 The position of the pitch is considered to be the least intrusive upon the open character of the playing fields due to being positioned close to the existing buildings.
- 8.39 The proposal includes creating and extending existing grassed bunds of up to 2 metres high planted with wildflowers. These bunds will help to mitigate against the visual impact when viewed from within Brookfield Gardens.
- 8.40 For these reasons, the proposals are considered to respect the key characteristics of the area and comply with Policy CS17 of the Local Plan Part 1: Core Strategy.

c) Impact upon neighbouring properties

- 8.41 Policy DSP2 of the Local Plan Part 2: Development Sites and Policies states that:

“Development proposals should not, individually, or cumulatively, have a significant adverse impact, either on neighbouring development, adjoining land, or the wider environment, by reason of noise, heat, liquids, vibration, light or air pollution (including dust, smoke, fumes or odour).

Development should provide for the satisfactory disposal of surface and waste water, and should not be detrimental to the management and protection of water resources.”

- 8.42 Many of the third-party objections received relate to the impact upon neighbouring residential properties by way of noise and light pollution.

Noise

- 8.43 The Council's Environmental Health service were consulted during the course of the application. The Environmental Health Officer raised initial concerns when the application was first submitted relating to the proximity of the proposal to residential properties and the closing time of 22:00hrs and requested that an Acoustic Assessment (noise report) was carried out and submitted.
- 8.44 Discussions were had with the planning agent who has agreed that the scheme can still be viable with a 21:00hrs finishing time; an acoustic assessment was submitted.
- 8.45 Criticism of this noise report was received in the third party comments and in deputations to the Planning Committee in September 2021. The third party critique was mainly at the methodology utilised, the lack of consideration to the prevailing background noise levels and the fact that the report assessed the adjacent properties in Brookfield Gardens as two storey properties when in fact they are three storey.
- 8.46 A noise assessment for this type of proposal does not have any specific standard methodology or practice given that the noise levels will vary depending on the intensity of the use and the background noise levels at the time of the use. Furthermore, the Development Plan nor the National Planning Policy Framework prescribe a noise assessment methodology for this type of proposal.
- 8.47 The NPPF cross refers, however, to the Noise Policy Statement for England (NPSE). This was published in March 2010 and aims to provide clarity regarding current policies and practices to enable noise management decisions to be made. It applies to all forms of noise including environmental noise, neighbour noise and neighbourhood noise.
- 8.48 The NPSE introduces the concept of "Significant adverse" and "Adverse" impacts of noise which relate to the noise policy aims. These are applied as follows:

NOEL – No Observed Effect Level

This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise.

LOAEL – Lowest Observed Adverse Effect Level

This is the level above which adverse effects on health and quality of life can be detected.

SOAEL – Significant Observed Adverse Effect Level

This is the level above which significant adverse effects on health and quality of life occur.

- 8.49 The Planning Practice Guidance sets out that *“Noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment.”*
- 8.50 The Acoustic Assessment sets out that in the absence of any defined methodology, that the World Health Organisation’s (WHO) Guidelines for Community Noise should be used seeing as these guidelines include “sport events”.
- 8.51 There are two component parts to the noise assessment in order to understand the overall noise impact of the proposal. Firstly, is the measurement of continuous noise – the LAeq measurement. Secondly are the more intermittent, brief sound noises such as a loud shout or a whistle.
- 8.52 Taking the first part of the sound assessment; According to the WHO guidance, moderate annoyance is caused by noise levels exceeding 50 LAeq(T) dB externally and 35 LAeq(T) dB internally. When noise varies over time an LAeq measurement records the equivalent continuous noise level.
- 8.53 Therefore, if noise levels arising from a development do not exceed 50 LAeq(T) dB externally and 35 LAeq(T) dB internally, the effect is below the Lowest Observed Adverse Effect Level (this is the level above which adverse effects on health and quality of life can be detected as per the NPSE referred to earlier) and will have no significant adverse effect.
- 8.54 Since the deferral from planning committee the applicant has sought to measure the background noise levels. The amended noise report sets out that the background noise level was measured between 18.00 and 21.00 with results ranging from 45 LAeq(1 hour) dB at 18.00 through to 41 LAeq(1 hour) dB at 21.00. The narrative in the Noise Assessment notes that the noise climate was primarily determined by the noise from local roads and the M27 due north of the school.
- 8.55 The noise report has sought to gather noise from the use of other Artificial Grass Pitches as a means of comparison. Nine sport sessions on four separate pitches have been measured. This data includes noise from football, hockey and rugby with the users being men, women and children.
- 8.56 Using the noise model and associated guidance, the application then predicts the equivalent noise level with the proposal in place externally at the nearest noise sensitive property as 46 LAeq(1 hour) dB. The Noise Assessment also shows the highest predicted noise level at any height (thus taking account of the first and second floors) of the closest neighbouring buildings as 47dB. This level of noise would account for the continuous noise from the game or boots on the artificial grass surface and the kicking of the ball. This noise level falls within the accepted parameters of the WHO Guidelines.
- 8.57 Moving to the second part of the noise assessment; Noise on the Artificial Grass Pitch will vary and is not always constant throughout its use with

differing voices and whistles being intermittent sounds as well as that of the sport equipment itself such as balls hitting fences.

- 8.58 In considering this type of intermittent noise the appropriate means of measurement for this type of noise is a measurement whereby a maximum sound level over a short time period is captured and measured, such as a whistle blow, rather than an average of sounds over a set period of time. This is annotated as dB LA_{max} (fast).
- 8.59 The Acoustic Assessment has used the data collected from other pitches around the country where these types of sounds have been measured. The submission has concluded that these intermittent noises generally occur at a height of 1.5m above the playing surface, at the approximate head level of the players, and that this dissipates quickly beyond the pitch environment.
- 8.60 In assessing the potentially louder and more infrequent, but interruptive noise events, the submission details that there is a night time maximum noise criterion of 45dB LA_{max} (fast) for within bedrooms at night. The noise assessment sets out that, the external night time limit would equate to 60dB. 'Night time' for the purpose of the WHO and BS8233 (BS 8233: 2014 provides recommendations for the control of noise in and around buildings) is between the hours of 23.00 and 07.00. As such, for Noise Assessment purposes, the noise limits should be measured against daytime thresholds despite the proposed pitch being used until 21.00. The noise assessment sets out that there are no specific noise criteria for maximum noise levels from this type of noise during the day. The difference between the daytime and night time equivalent noise criteria in both WHO and BS8233:2014, however, is 5 decibels; it is therefore reasonable that a 5 decibel increase to the maximum noise level is appropriate making the maximum external noise threshold 65dB for intermittent sounds.
- 8.61 When taking account of the noise source height (1.5m high), the proposed bund alterations and the distance to the neighbouring properties in Brookfield Gardens the Acoustic Assessment concludes that the highest predicted noise levels, from the proposed Artificial Grass Pitch, at the façade of the nearest residential houses and in the gardens are:
- 49dB from voices;
 - 64dB from a Whistle; and
 - 57dB from a ball impact.
- 8.62 The transient noises therefore are lower than the 65dB LA_{max} (fast) external, daytime figure for ball impacts, whistles and voices.
- 8.63 The impact of the whistle is towards the top end of the threshold criteria. However, this level of noise only occurs in the very north east corner of the pitch and match officials would not be in the same location throughout the pitch use. When whistle users move out of this corner the noise level would be further reduced. Furthermore, the applicant has offered, within the Community

Engagement Statement, that a rule of no whistles after 20.00hrs – so for the last hour of the use of the pitch – could be imposed.

- 8.64 In concluding, the noise assessment reports that the proposals result in a minor increase in the overall noise climate at the noise sensitive receptor (Brookfield Gardens) between 19.00-21.00 hours and a moderate impact between 21.00-22.00.
- 8.65 On the basis that the use of whistles is restricted after 8pm and the pitch use finishes at 9pm, it is considered that the proposal would not give rise to a 'significant adverse impact' and is therefore compliant with policy DSP2.
- 8.66 Further mitigation to reduce noise is also proposed in the fence design. The fence is proposed to have neoprene washers fitted to the fence post/ panel fixings to reduce panel rattle and vibration from the impact of balls.
- 8.67 Within the Noise Assessment it is recommended that a Noise Management Plan be implemented as part of the use of the development. Such a management plan would include details such as:
- A method to inform users of unacceptable language not being tolerated and such behaviour will result in users being asked to leave and even banned;
 - A reporting facility for neighbours to report excessive noise or anti-social behaviour to enable complaints to be dealt with quickly;
 - Noise investigation processes / action plan so that complaints are dealt with swiftly;
 - A complaints log;
 - Maintenance regime to ensure that fence panels do not become loose and rattle excessively

This Noise Management Plan is included in the recommendation as part of the condition to secure a community use agreement for the pitch.

- 8.68 The Environmental Health Officer (EHO) raised no objections to the original Noise Assessment – its methodology or conclusions - provided that the closing time of the pitch is no later than 21:00hrs and, as above, this can be secured by condition. Further EHO comments are awaited at the time of writing this report and as such any additional comments will be reported to the Committee via the update paper.
- 8.69 In conclusion on Noise; it is considered that the noise level from the use of the Artificial Grass Pitch may be noticeable but not intrusive to the point that this causes such a degree of harm to conflict with the development plan. Therefore the proposal is considered acceptable in planning terms. Members are reminded that there is no objection from the Environmental Health Officer and that Policy DSP2 of the Local Plan Part 2 seeks to ensure that development proposals do not have a 'significant adverse impact ...on neighbouring development...'

Lighting

- 8.70 A lighting strategy was submitted with the application which predicts that light spillage does not impact on any local residential properties or highways as a result of the design and light fitting cowls on the flood lighting columns. The strategy predicts that outside of the sports pitch the lighting level will be less than 2 lux (which is the intensity of light as measured on a given surface taking into account the area over which the luminous flux is spread). The Environmental Health Officer raised no objections to the lighting proposed.
- 8.71 The closest residential property to the proposed pitch is 44 Brookfield Gardens which is approximately 54 metres away. Whilst the lighting columns and lights would be visible within the landscape over this distance the design of the lighting to focus down and straight onto the playing surface is considered to be acceptable.
- 8.72 For these reasons, the proposal is not considered to result in a significant adverse impact upon the neighbouring residential properties by way of light or noise pollution and complies with Policy DSP2.
- 8.73 Policy DSP3 of the Local Plan part 2: Development Sites and Policies states:
- “Development proposals should ensure that there will be no unacceptable adverse impact upon living conditions on the site or neighbouring development, by way of the loss of sunlight, daylight, outlook and/or privacy.”*
- 8.74 Whilst the proposal is for a full sized artificial grass football pitch and is large in size, it will be largely screened from the houses within Brookfield Gardens by the existing tree line and the proposed extensions to the grassed bunds.
- 8.75 Furthermore, the closest part of the proposal which is the grassed bunds is in excess of 30 metres away from the closest property.
- 8.76 The proposal is therefore, not considered to result in an unacceptable adverse impact upon any of the neighbouring properties by way of a loss of sunlight, daylight, outlook and/ or privacy and complies with Policy DSP3.

d) Highways

- 8.77 Policy CS5 states that:

“The Council will permit development which:

- *contributes towards and/or provides necessary and appropriate transport infrastructure including reduce and manage measures and traffic management measures in a timely way*
- *does not adversely affect the safety and operation of the strategic and local road network, public transport operations or pedestrian and cycle routes*

- *is designed and implemented to prioritise and encourage safe and reliable journey's by walking, cycling and public transport."*

8.78 The application site has an existing car park which has 151 car parking spaces, 4 motorcycle parking spaces, 4 disability spaces, 254 cycle spaces and 2 spaces suitable for buses.

8.79 The predicted worst-case scenario on the amount of parking spaces required is 64 spaces. At times outside of use outside of the school day it is considered that there is adequate onsite parking provision within the school grounds. The design and access statement submitted with the application states that green travel opportunities including public transport, walking and cycling will also be promoted wherever possible.

8.80 Hampshire County Council were consulted during the course of the application as the Highway Authority. The applicant has explained that the proposal is intended for use by the school students during the school day and only open to the wider community outside of school hours. Therefore, the Highway Authority has confirmed that the impact from the proposal upon the local road network is not considered to be severe and do not object to the proposal provided that a condition is included to prevent the pitch being used by the wider community during school hours.

8.81 For these reasons, the proposal is considered to comply with Policy CS5 and in turn the criteria of policies DSP8, 10 and 53.

e) Ecology

8.82 Policy DSP13 states that:

"Development may be permitted where it can be demonstrated that

- i. designated sites and sites of nature conservation value are protected and where appropriate enhanced*
- ii. protected and priority species populations and their associated habitats, breeding areas, foraging areas are protected and, where appropriate, enhanced*
- iii. where appropriate, opportunities to provide a net gain in biodiversity have been explored and biodiversity enhancements incorporated; and*
- iv. The proposal would not prejudice or result in the fragmentation of the biodiversity network.*

Proposals resulting in detrimental impacts to the above shall only be granted where the planning authority is satisfied that (this section of the policy should not be applied to impacts on SPA designated sites which are subject to stricter protection tests as set out in The Conservation of Species and Habitats Regulations (as amended) 2010);

- i. *Impacts are outweighed by the need for, and benefits of, the development; and*
- ii. *Adverse impacts can be minimised, and provision is made for mitigation and, where necessary, compensation for those impacts is provided.*

Enhancements that contribute to local habitat restoration and creation initiatives as set out in the Hampshire Biodiversity Action Plan (or other similar relevant document) will be supported.”

- 8.83 An Ecology Report was submitted with the application which confirms that the proposed location of the pitch is of low ecological value. The floodlighting has been designed to avoid any light spillage to boundary habitats which are of value to commuting/foraging bats and therefore, the level of lighting is not considered to be of a concern in relation to ecology.
- 8.84 The Council's Ecologist was consulted during the course of the application and has raised no objections.
- 8.85 It is also noted that the proposal includes the planting of wildflower and grass seeds on the bunds which will help in creating dark corridors along the boundary and the Ecologist has suggested that the enhancements are secured by planning condition. The proposal is therefore, considered to comply with Policy DSP13.

e) Community Engagement

- 8.86 Concerns were raised at the lack of engagement by the applicant with the surrounding community prior to the submission of the application.
- 8.87 It is set out within the National Planning Policy Framework that *“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community” (para 39).*
- 8.88 There is no doubt that earlier engagement between the applicant and its neighbours would have been to the benefit of the applicant and the proposal. Many of the issues raised by third party representations could have been addressed in the submission and if not resolved at least a better narrative could have been provided as to why certain parts of the proposal are designed as they are.
- 8.89 Since the deferral of the application in September 2021, the applicant has undertaken to engage with neighbours by virtue of a holding a meeting at the school. The meeting was attended by three representatives from the neighbouring properties, two Councillors, the school Headteacher, the school Business Manager, three school governors, one representative from the Football Foundation and a representative from the local Football Association.
- 8.90 The issues discussed at the meeting were:

- Light Pollution;
- Noise;
- Location; and
- 3G Surface and rubber crumb;

8.91 The outcome of the meeting was summarised and submitted as part of the additional documents as a Community Engagement Statement. The issues discussed and addressed at the meeting relative to the material planning considerations have been incorporated into the report and addressed, where necessary, against the relevant planning policy.

g) Other matters

Existing School Fencing:

8.92 A number of representations raised a concern that the current fencing surrounding the school field is inadequate. However, the proposal includes an access to the new pitch from the existing carpark on the school site and access would be via this route and the use of the Artificial Grass Pitch will be required to use this route through the community use agreement which is secured by planning condition. As such the adequacy of the existing school boundary fencing is not material to this application.

8.93 Concerns were raised by a number of residents regarding the material used for 3G pitches including health concerns and the migration of the rubber crumb off the pitch with the associated environmental impacts.

Health Concerns:

8.94 The Football Association (FA) has previously (June 2017) issued a statement regarding the use of artificial grass pitches. The FA statement sets out that it has monitored numerous independent scientific studies regarding the safety associated with 3G pitches. The studies reported a very low/ negligible level of concern for human health as a result of 3G pitches and rubber crumb. The European Chemicals Agency also published its own findings, following an extensive EU-wide study, and has found no reason to advise people against playing sport on 3G pitches with rubber crumb. FIFA also stated that the newer studies have confirmed that there is no evidence of a link between contracting cancer and playing on artificial turf.

8.95 Since the deferral of the application in September 2021 Officers have sought specialist advice from the UK Health Security Agency (UKHSA); formerly Public Health England. The UKHSA refer to a European Chemicals Agency (ECHA) report published in 2017 which stated that there was a very low level of concern when playing on artificial pitches that contain rubber crumb and ECHA note that they found no reason to advise people against playing sport on synthetic turf containing recycled rubber granules as infill material. ECHA recommended that people take basic hygiene measures when playing on

those surfaces, as they would when playing sport on grass or any other surfaces.

- 8.96 Whilst the UKHSA draw attention to other ongoing pieces of research, they do not advise, neither do the European Chemical Agency, nor the sporting governing bodies, against the use of artificial grass turf pitches with a rubber crumb infill material on health grounds.

Environmental Impacts:

- 8.97 At the school's community engagement meeting the representative of Football Foundation advised neighbours that the rubber crumb infill material is currently what the FA recommends and that there are no other cost efficient alternatives. The Football Foundation representative also set out that the lifespan of the pitch is between eight to twelve years. If, in time, a more environmentally friendly option becomes available, then that is what would be used for its replacement.
- 8.98 The additional submission in November 2021 by the applicant does identify that there are other infill materials available. Other natural materials such as cork as an infill may be more environmentally friendly in so far as the migration of a cork crumb off of a pitch to its surrounds. However, sourcing such a material is not considered sustainable. The application submits that some biodegradable materials will result in loss of its mass quicker and therefore need more material over the pitch lifetime. The testing process for biodegradable infills is, according to the submission, also still unclear. As per the previous paragraph this particular rubber crumb material is recommended by the sport governing body and used worldwide.
- 8.99 The additional documents submitted in November 2021 provides some comparative data on microplastics. As an example, the application cites that car tyres are a producer of microplastics and tyres create 64% of microplastics disposed of into the environment with sport fields creating 3%. The application also submits that this is prior to the installation of mitigating design features at sport venues. The detail in the application also indicates that artificial turf infill is formed from recycled tyres.
- 8.100 It is accepted that you cannot stop all rubber crumb from migrating off the pitch. However, the mitigating design features to be installed on the proposed pitch are considered, by the applicant, to reduce the potential for rubber crumb infill material migrating to the surroundings of a facility and adding to the concerns of microplastics in the environment. As already mentioned this type of facility is considered to be appropriate by the sport governing bodies and Sport England.
- 8.101 The first of the mitigating features, the additional details submitted by the applicant indicate, is that there is a strict protocol for suppliers and installers to follow during construction. This protocol is endorsed by Sport England and sport governing bodies.

8.102 The additional details also set out that the pitch is a series of layers which can also act as a filtering process for any surface water.

8.103 The detailed design features included to minimise rubber crumb loss include:

- 0.2 and 0.5m high containment barriers around the base of the fencing;
- Football boot cleaning stations;
- Steel grates with waste trays at each entrance point;
- Pathways around the pitch finished in asphalt;
- Drainage inspection chambers with sumps to capture any material from entering the drainage system.

8.104 Beyond these measures the operator, the school, should ensure that users undertake to check kit and brush off before leaving the facility. Then, when off the pitch, any further crumb on any kit should be shaken out over a bin rather than a sink or drain. Granules should be collected and put in a waste bin or returned to the field of play.

8.105 The design and access and planning statement submitted with the application states that the maintenance of the pitch will be carried out by a team of on-site grounds staff. Specific equipment will be purchased to maintain the pitch, including a tractor, brush, leaf collector and blower and this equipment will be stored within the perimeter gates of the new Artificial Grass Pitch to avoid contamination and migration of the crumb off site as much as possible. Routine maintenance will include drag brushing and rubber top ups with the equipment used being kept within the area of the pitch. This routine maintenance will also ensure that the pitch reaches its full lifetime expectancy.

8.106 There is a delicate balance to be struck between the use of microplastics and the health benefits of the sport pitch and the community benefit it would bring. It is also noted that there are differing bodies of research and evidence with different conclusions on the impacts of microplastics; understandably the applicant refers to research in its favour and the objectors find research against the use of such plastics.

8.107 The emerging Strategic Policy CC1 of the Fareham Local Plan 2037 sets out how the Council will promote mitigation and adaptation to climate change. Specifically the policy details in criterion e) that the Authority will support the reuse and use of sustainably sourced materials. Whilst the microplastic may not be a sustainably sourced material, the fact that the sports pitch technology is already using recycled car tyres as part of its construction must weigh in its favour. Furthermore, the series of mitigation factors to be included in the design of the pitch to minimise as much as possible plastic migration off site, are such that in this case the proposal is considered to be acceptable.

Disruption during construction:

8.108 In terms of concerns at damage and disruption during construction within the third party representations, the applicant has submitted a construction

management plan as part of the application. This has been reviewed by Officers and the content of this Plan is to be secured by planning condition with provision for the site compound, contractor parking and material store all on site. The construction access is to be taken from Brookfield Gardens rather than through the school itself. It is accepted that there may be some disruption to neighbours during construction as a result and that this is an inevitable consequence of development taking place. However further planning conditions can control the hours of work during the construction period in order to manage this temporary disruption during construction.

Summary

8.109 For the reasons given above, the proposal is considered to comply with Local Plan policies subject to conditions and is considered to contribute towards an identified need for a 3G pitch within the Borough without causing unacceptable harm to the character of the area, the amenity of residents or highway safety.

9.0 Recommendation

9.1 PLANNING PERMISSION, subject to the following Conditions:

1. The development hereby permitted shall be begun before the expiration of a period of three years from the date of this decision notice.

REASON: To allow a reasonable time period for work to start, to comply with Section 91 of the Town and Country Planning Act 1990, and to enable the Council to review the position if a fresh application is made after that time.

2. The development shall be carried out in accordance with the following approved documents:
 - a. Drawing No: 02 – Site Location Plan
 - b. Drawing No: 03 – Proposed Site Plan
 - c. Drawing No: 05 – Proposed Elevation
 - d. Drawing No: 05 – Proposed ATP Plan
 - e. Drawing No: 06 – Floodlighting Scheme
 - f. Drawing No: 08 Rev 01 – Playing Field Layout

REASON: To avoid any doubt over what has been permitted.

3. The floodlighting hereby permitted shall be installed and operated in accordance with the approved Floodlighting Performance Report, reference CLS-007, dated 14-04-2021, prepared by Surfacing Standards Limited.

REASON: In order to prevent light disturbance to occupiers of nearby residential properties and control light pollution.

4. The development hereby approved shall be carried out in full accordance with the recommendations and enhancements set out in the approved Ecological Report by BJ Collins Protected Species Surveyors dates April 2021 submitted

as part of the application. None of the development hereby approved shall be first used until the approved ecological enhancements have been fully implemented. These enhancement measures shall be subsequently retained.
REASON: To ensure that protected species are not harmed, and that habitat is enhanced as a result of the proposed development.

5. No work on site relating to the construction of any of the development hereby permitted (Including works of demolition or preparation prior to operations) shall take place before the hours of 0800 or after 1800 Monday to Friday, before the hours of 0800 or after 1300 Saturdays or at all on Sundays or recognised bank and public holidays, unless otherwise first agreed in writing with the Local Planning Authority.

REASON: To protect the occupiers of nearby residential properties against noise and disturbance during the construction period.

6. The development shall be carried out in accordance with the approved Construction Phase Health and Safety Plan by Lano Sports and CLS Sports dated 06.07.21.

REASON: In the interests of public safety and neighbouring amenity during the construction phase.

7. The Artificial Grass Pitch (including the floodlighting) shall not be used outside the following hours: -

08:30 to 21:00 Mondays - Fridays

08:30 to 16:00 Saturdays

09:00 to 15:30 Sundays/Bank Holidays

REASON: To protect the occupiers of the nearby residential properties from possible disturbance.

8. Prior to the use of the Artificial Grass Pitch, the approved fences shall have neoprene washers fitted to the fence post/ panel fixings to reduce panel rattle and vibration from the impact of balls. The neoprene washers shall remain in place and be maintained for the duration of the development.

REASON: To protect the occupiers of nearby residential properties against noise and disturbance

9. The extension to the existing bunds due east of the artificial grass pitch hereby approved as a part of this application shall be constructed in accordance with the approved plans prior to the first use of the Artificial Grass Pitch and be no less than 2 metres in height. The height of the bunds shall be retained at 2 metres high for the duration of the use of the development.

REASON: In the interests of visual amenity, to protect the occupiers of the nearby residential properties from noise disturbance.

10. The development hereby permitted shall only be open for use by the public outside of school operating hours.

REASON: In the interests of highway safety.

11. Prior to first use of the Artificial Grass Pitch a community use agreement prepared in consultation with Sport England must be submitted to and approved in writing by the Local Planning Authority, The agreement shall apply to the Artificial Grass Pitch, any ancillary accommodation and the car park, and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities, a noise management plan and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement.

REASON: To secure well managed safe community access to the sports facility, to ensure sufficient benefit to the development of sport and to accord with development plan policy.

12. There shall be no use of whistles on the Artificial Grass Pitch hereby permitted between 20.00 hours – 21.00 hours.

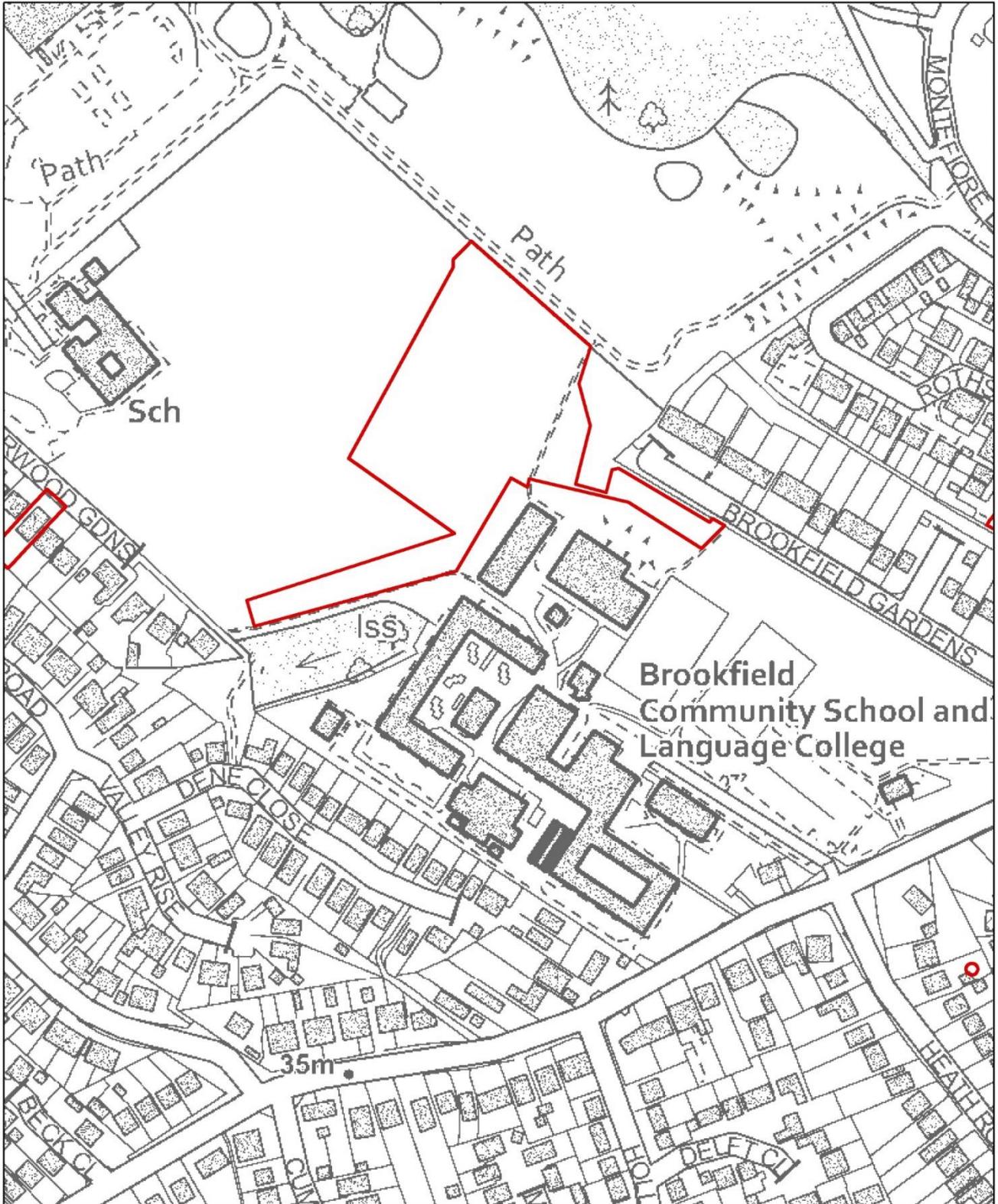
REASON: To protect the occupiers of the nearby residential properties from possible disturbance.

10.0 Background Papers

P/21/0693/FP

FAREHAM

BOROUGH COUNCIL



Brookfield Community School
Scale 1:2500



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