

**FULL PLANNING APPLICATION
WARDEN PARK ACADEMY
BROAD ST
CUCKFIELD
HAYWARDS HEATH
WEST SUSSEX
RH17 5DP**

**PROPOSED SYNTHETIC TURF PITCH, FLOODLIGHTING, FENCING,
DRAINAGE, AND ANCILLARY WORKS**

PLANNING STATEMENT

JANUARY 2016

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Appendix 1 Letter to residents (3rd Dec 2015)

Appendix 2 Sport England Response (GJP Jan 2016)

1. INTRODUCTION

Background

- 1.1 This Planning Statement has been prepared in support of a Full Planning Application for the following development proposal at Warden Park Academy:

'Proposed synthetic turf pitch, floodlighting, fencing, drainage, and ancillary works.'

Documents Submitted in Support of this Application

- 1.2 The following documentation is submitted in support of the planning application.

Issue	Document / Plan / Reference
Planning Application Form	
Site Location Plan (1:1250)	NSWPAT005
Proposed Site Layout (1:500)	NSWPAT003b
3D Cross Section, Fencing Plan and Elevation	NSWPA002c
Levels Plan	SCC/WPS/03
Drainage Details	NSWPA002c
Floodlighting Details Product Data Sheet	Haliday Lighting Mast (15m) Siteco (Ref: 5NA76901WB03)
Lightspill Details	Haliday – Proposed Floodlighting
Sport England E4 Statement	Response Note, Geraint John Planning, Jan 2016
Planning Statement	Planning Statement, Geraint John Planning, Jan 2016
Phase 1 Habitat Survey	PJC Consultancy Ltd, May 2014

Table outlining Supporting Documents

Purpose and Structure of this Statement

- 1.3 This Planning Statement outlines the context within which the application is made, and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development.

- 1.4 The Statement is structured as follows:

- **Section 2:** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site.
- **Section 3:** provides details of the development proposals.
- **Section 4:** outlines the pre-application engagement undertaken in formulating the proposals;
- **Section 5:** outlines the relevant planning policy framework in relation to the site and the development.
- **Section 6:** analyses the key material considerations arising from the proposed development (in light of the planning policy context and discussions with the Local Authority).
- **Section 7:** sets out the summary and conclusions of this Statement.

2. SITE AND SURROUNDINGS

Site Location

- 2.1 The application site is located within the playing fields of Warden Park Academy, a secondary school located off Broad Street in Cuckfield.



Site Aerial Plan – Location illustrated by red line

- 2.2 The synthetic turf pitch is proposed to be located on playing fields currently marked-out, and utilised, for football. The site is located to the south of the school buildings along with various other playing fields. The school has approximately 165 parking spaces.
- 2.3 The sites surroundings comprise:
- North: school buildings and trees/hedgerow adjoining residential development located on Warden Court;
 - South: agricultural fields which adjoin the A272 further south;
 - East: school playing fields adjoining residential development on Broad Street further east; and
 - West: school fields along with a cluster of trees / hedgerow.

Site Planning History

- 2.4 A search of relevant planning applications relating to the site has been undertaken utilising the Mid Sussex online database. The search identified the following relevant applications:

LPA Ref	Description	Decision
14/00036/FUL	Extension to Warden Park Academy Trust to provide 4 additional classrooms, drama studio, shared circulation space and associated WC's	Approved 07/03/2014
13/01733/FUL	Proposed single storey extension to the left side of the existing front reception.	Approved 04/07/2013

- 2.5 The planning history demonstrates that applications for enhanced / extended education provision have been positively decided upon in the past.
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3. DEVELOPMENT PROPOSALS

Proposal Description

- 3.1 This application seeks full planning permission for the proposed synthetic turf pitch, floodlighting, fencing, drainage, and ancillary works.
- 3.2 In summary, the proposal comprises of the following components:
- Pitch: marked-up for football use, being FIFA and FA compliant with pitch footprint of 97m x 61m;
 - Fencing: high rolled mesh powder coated green fencing to a height of 3m and 5m;
 - Floodlighting: 8 no. 15 metre height floodlights. The floodlights proposed are the A3 Maxi sports floodlights which features flat style optics designed to reduce upward waste light and overspill. It is intended that time clocks will be installed to ensure that lights cannot be operated outside the permitted times;
 - Hours of operation: 0800 – 2200;
 - Hours of floodlighting: 0800 - 2230;
 - Terms of use: The facility will be made available to the local community such as youth and adult sports clubs and other community groups;
 - Drainage: To be comprised of the following elements, as shown on Drainage Plan NSWPA002c:
 - Lateral drains: 80mm perforated UPVC pipes within gravel filled trenches with all trenches to be filled with a geotextile membrane. All lateral drains are to be positioned at 12m centres within pitch footprint;
 - Carrier drains: 100mm diameter perforated UPVC pipes within gravel filled trenches with all trenches to be lined with a geotextile membrane. All carrier drains are to be positioned 500mm within pitch footprint; and
 - Outfall: to lagoon.
 - Access: Access for the site exists via an unnamed access road from Broad Street to the school grounds which has an existing parking provision on site.
- 3.3 The benefits of the proposal would be all year round usage of the pitch resulting in no loss of use during inclement weather for matches and training purposes. The fencing would prevent some balls from leaving the site during play.
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4. PRE-APPLICATION DIALOGUE

- 4.1 Pre-application dialogue with the Local Authority, residents and stakeholders has been undertaken by the School in order to gain feedback on the acceptability of the proposals.
- 4.2 The objective of the pre-application consultation undertaken with the Authority was to clarify the acceptability of the proposals, and the level of detail required to enable the authority to determine an application. As such, a formal meeting was carried out of site, as well as a subsequent email containing advice from the Case Officer.
- 4.3 The initial pre-application meeting took place on site on 09/10/2015 and a subsequent email containing advice on the proposals was received from the Planning Officer on 25/11/2015. This advice outlined that the principle of the development was acceptable and that the following issues would need to be considered within the application:
- Lighting and details of such;
 - Noise levels / disturbance of residents;
 - Design;
 - Landscape impact; and
 - Impacts on traffic and parking.
- 4.4 In addition, consultation was undertaken with the Parish Council on two occasions during the pre-application stage in order to discuss and to gain feedback on the proposals.
- 4.5 The local residents of Cuckfield, particularly residents who are located nearby to the school have also been consulted on two occasions via letter drops which inform them of the proposals. A copy of regarding a drop-in event which was held on 14/12/2015 is attached at **Appendix 1.**
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5. PLANNING POLICY CONTEXT

- 5.1 This section of the statement provides a summary of the relevant planning policy framework in relation to the site and the proposed development, from the national through to local level.
- 5.2 In light of the importance of demonstrating the suitability of the site and the proposals for its intended use, this section of the statement also includes a detailed review of the relevant policy and guidance relating to the requirements of Sport England.
- 5.3 The key planning policies of relevance to the determination of the application are outlined below, and a detailed assessment of the proposed development against these being provided in Section 5 of the Statement (Material Considerations).

National Planning Policy

- 5.4 The following policy / guidance documents prepared at the national level are of relevance to the determination of the application.

National Planning Policy Framework

Promoting Sustainable Development

- 5.5 The National Planning Policy Framework (NPPF), published March 2012, must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.
- 5.6 It is stated within the NPPF (paragraph 6) that 'the purpose of the planning system is to contribute to the achievement of sustainable development'.
- 5.7 The NPPF is based upon a 'presumption in favour of sustainable development', which is defined by five principles as set out in the UK Sustainable Development Strategy:
- living within the planet's environmental limits
 - ensuring a strong, healthy and just society
 - achieving a sustainable economy
 - promoting good governance
 - using sound science responsibly
- 5.8 As summarised at paragraph 14 of the NPPF, the presumption in favour of sustainable development means (for decision making):
- approving applications that accord with the plan without delay;
 - in the absence of a plan or policies, granting permission unless adverse impacts would demonstrably outweigh benefits when assessed against the NPPF.
- 5.9 It is set out within the NPPF that sustainable development can play three critical roles:
- an economic role, contributing to a strong, responsive, competitive economy;
 - a social role, supporting vibrant and healthy communities; and
 - an environmental role, protecting and enhancing the natural, built and historic environment.
- 5.10 The NPPF sets out twelve core planning principles which 'should underpin both plan-making and decision-taking' (paragraph 17). A number of these principles are directly relevant to the proposed development, including recognition that planning should:
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- take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs;
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas;
- support the transition to a low carbon future in a changing climate, taking full account of flood risk, and encourage the reuse of existing resources;
- contribute to conserving and enhancing the natural environment and reducing pollution;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- help conserve and enhance the natural environment and reduce pollution, allocating land of lesser environmental value;
- promote mixed use developments, encouraging multiple benefits from urban and rural land; and
- manage development to make full use of public transport, walking and cycling.

Promoting and Safeguarding Sports and Recreational Facilities

- 5.11 Section 8 of the NPPF seeks to promote healthy communities and notes (in paragraph 69) that *'the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities'*, and that *'to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared space, community facilities (such as sports venues) and other local services to enhance the sustainability of communities and residential environments'*.
- 5.12 Furthermore, paragraph 73 identifies that *'access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities'*.
- 5.13 Paragraph 74 states that *'existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless ... the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location'*.

Conserving and Enhancing the Natural Environment

- 5.14 Paragraph 109 states that *'the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity [and] preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution'*.

Amenity

- 5.15 In relation to the noise impact of development, paragraph 123 states that *'planning policies and decisions should aim to:*
- *avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;*
 - *mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;*
 - *recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.'*

- 5.16 In relation to the lighting impact of development, paragraph 125 states that *'by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation'*.

Sport England

- 5.17 Sport England has an established role providing comments, advice and guidance to local authorities, sports clubs and other parties on planning applications relating to the provision of new sports facilities.

- 5.18 Sport England's Planning Policy Statement: A Sporting Future for the Playing Fields of England states:

"Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field, or land last used as a playing field or land allocated for use as a playing field in an adopted or draft deposit plan, unless, in the judgement of Sport England, specific circumstances apply."

- 5.19 One such circumstance where Sport England would not object to proposals affecting playing fields, and which applies in this instance, is set out in Policy Exception E5, which states:

'The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.'

- 5.20 Sport England have specific information requirements when assessing an application against this policy exception. A response is provided to each of the specific criteria / questions contained within the Policy in Sport England E5 Statement submitted in support of this application.

- 5.21 The project is consistent with the following Planning Policy Objective 7 of Sport England's "Planning for Sport & Active Recreation: Objectives and Opportunities" document which states the aim:

'To support the development of new facilities, the enhancement of existing facilities and the provision and/or improvement of access to the natural environment which will secure opportunities to take part in sport and which can be achieved in a way which meets sustainable objectives'

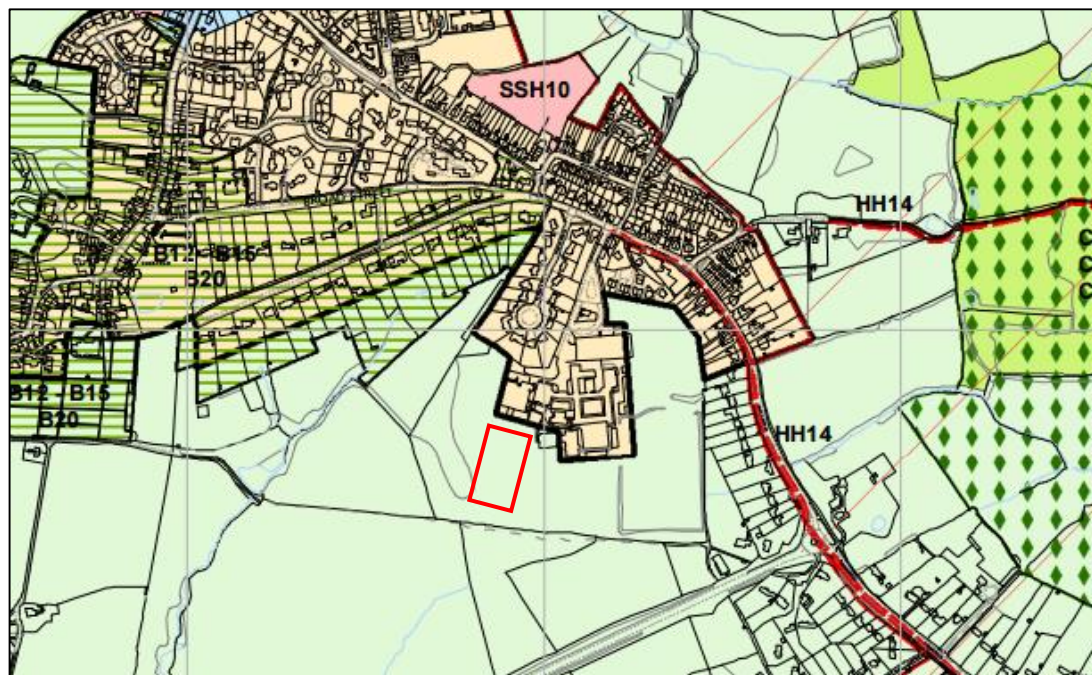
Local Planning Policy

Adopted Local Plan

Mid Sussex Local Plan 2004

- 5.22 The site is within the administrative boundaries of Mid Sussex Council. The existing Local Plan is the Mid Sussex Local Plan 2004, which was adopted May 27th 2004. Although now outdated, this remains the adopted plan for this area.

- 5.23 The following is an extract of the Proposals Map of the Adopted Local Plan:



Mid Sussex Local Plan Policy Map Extract

5.24 The site is located in the following areas in terms of its land use designation:

- Within Countryside Area of Development Restraint;
- Adjacent to the Built up Area Boundary;
- Located outside the Conservation Area.

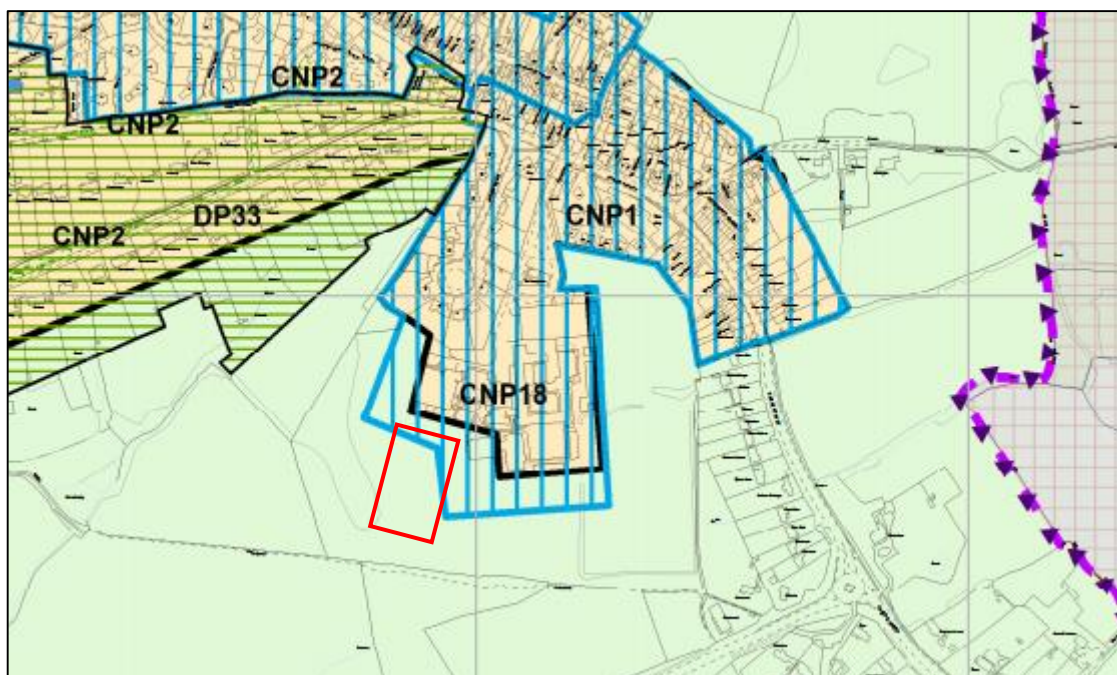
5.25 The relevant policies are as follows:

Policies	Extract
C1 Development in the Countryside	<i>Outside built-up area boundaries, as detailed on the Proposals and Inset Maps, the remainder of the plan area is classified as a Countryside Area of Development Restraint where the countryside will be protected for its own sake. Proposals for development in the countryside, particularly that which would extend the built-up area boundaries beyond those shown will be firmly resisted and restricted to: (a) proposals reasonably necessary for the purposes of agriculture or forestry; (b) proposals for new uses in rural buildings of a scale consistent with the building's location; (c) in appropriate cases, proposals for the extraction of minerals or the disposal of waste; (d) in appropriate cases, proposals for quiet informal recreation and/or tourism related developments; (e) proposals for facilities which are essential to meet the needs of local communities, and which cannot be accommodated satisfactorily within the built-up areas; (f) proposals for which a specific policy reference is made elsewhere in this Plan; and (g) proposals which significantly contribute to a sense of local identity and regional diversity.</i>
R5 Artificial Turf Pitches and Floodlighting	<i>Proposals will be permitted for the provision of artificial turf pitches on appropriate sites provided there is no unacceptable impact on the amenities of neighbouring residents. Conditions regarding hours of use may be applied on any planning permission granted. Proposals for floodlighting will be considered under Policy B24.</i>
B3 Neighbour Amenity	<i>Proposals for new development, including extensions to existing buildings and changes of use, will not be permitted if significant harm to the amenities of nearby residents is likely to be created due to noise and disturbance; loss of privacy; overlooking; reduction in sunlight and daylight; and reduction in outlook.</i>
B24 Light Pollution	<i>All new lighting proposals that require planning permission should be kept to the minimum necessary both in terms of intensity and in terms of the number of fittings proposed. Fittings should be attached to floodlights so as to restrict the emission of light to the areas for which floodlighting is required. Floodlighting which creates significant illumination beyond these areas, will not be allowed, particularly where it is likely to be detrimental to residential amenity or highway safety. There should not normally be any emission of light above the horizontal.</i>

	<i>Particular attention will be given to the impact of lighting proposals within a Conservation Area, on a Listed Building or outside the built-up area, especially within an Area of Outstanding Natural Beauty.</i>
CS13 Drainage	<i>Planning permission will not be granted for development unless the Local Planning Authority, in consultation with the Environment Agency, is satisfied that the site can be adequately drained. Developers will be required, where necessary, to provide facilities to control the rate of surface water run-off from development sites or, subject to there being no detriment to the natural habitat, carry out improvements to the receiving watercourses. Proposals for the design and long term maintenance of any engineering works (eg balancing ponds) must be submitted to and approved by the Local Planning Authority</i>
T4 Highways	<i>With respect to sustainability requirements and traffic generation all new development proposals should:</i> <i>(a) be within the boundaries of built up areas, as defined on the Proposals Map unless no such suitable site exists;</i> <i>(b) not cause an unacceptable impact on the local environment in terms of road safety and increased traffic;</i> <i>(c) be located close to public transport routes;</i> <i>(d) seek to minimise the increase in private car trips generated by the development;</i> <i>(e) provide convenient and safe pedestrian access to and within the development which should link to the wider footway network ensuring that the needs of those with mobility and sensory disabilities are met; (f) provide continuous and segregated cycle routes to and within the development which should link to the wider cycleway network;</i> <i>(g) conform with the District Council's adopted vehicle and cycle parking standards, these include the provision of parking spaces for people with disabilities. (See Policy T6).</i> <i>A financial contribution may be sought in appropriate circumstances towards measures which improve the accessibility and sustainability of the development site.</i>

Emerging Local Plan - Mid Sussex Pre-Submission District Plan

- 5.26 The Pre – Submission District Plan 2014 - 2031 was published on the 12th June 2015 and is currently undergoing consultation for the focused amendments the plan is due to be submitted in February 2016 and examination taking place in April 2016. The Plan is due to be adopted in July 2016 and is therefore a material planning consideration and weight will be given to relevant policies in accordance with paragraph 216 of the NPPF.



Emerging Local Plan Policy Map Extract

- 5.27 The site is located in the following areas in terms of its land use designation:

- Within Countryside Area of Development Restraint;
- Within Cuckfield Neighbourhood Plan Character Areas;
- Adjacent to the Built up Area Boundary;
- Located outside the Conservation Area.

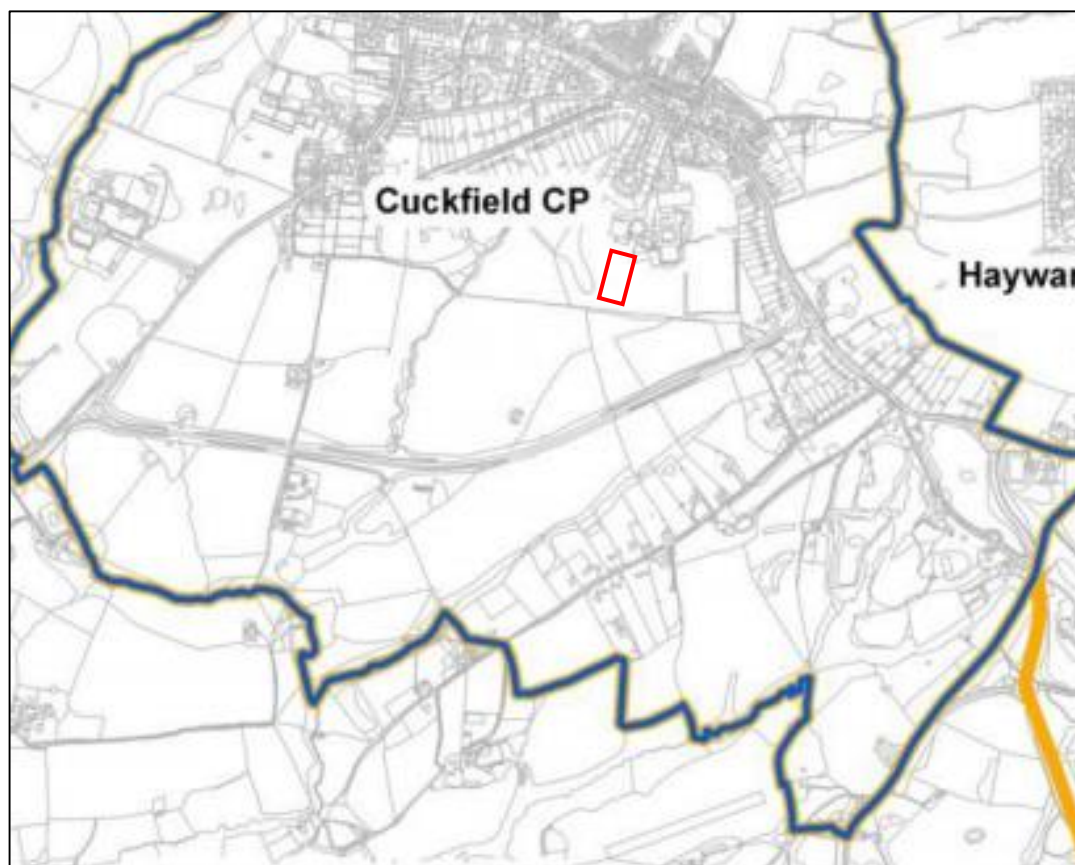
5.28 The relevant policies are as follows:

Policies	Extract
DP10 Countryside Protection	<i>The countryside will be valued for its own sake, recognising its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and:</i> • <i>it is necessary for the purposes of agriculture; or</i> • <i>it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.</i>
DP19 Transport	<i>To meet these objectives, development will only be permitted where:</i> • <i>It is sustainably located to minimise the need for travel;</i> • <i>It facilitates and promotes the increased use of alternative means of transport to the private car, such as the provision of, and access to, safe and convenient routes for walking, cycling and public transport, and includes suitable facilities for secure and safe cycle parking;</i> • <i>Does not cause a severe cumulative impact in terms of road safety and increased traffic congestion;</i> • <i>Is designed to adoptable standards, or other standards as agreed by the Local Planning Authority, including road widths and size of garages;</i> • <i>Provides adequate car parking for the proposed development in accordance with parking standards as agreed by the Local Planning Authority or in accordance with the relevant Neighbourhood Plan;</i> • <i>It is supported by a Transport Assessment/Statement and a Travel Plan that is effective and deliverable; and</i> • <i>Provides appropriate mitigation to support new development on the local and Strategic Road Network.</i>
DP22 Leisure Facilities	<i>Proposals that involve the loss of cultural facilities, open space, sports and recreational buildings and land, including playing fields, will not be supported unless:</i> • <i>an assessment has been undertaken which has clearly shown the cultural facility, open space, sports land or recreational building to be surplus to requirements; or</i> • <i>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> • <i>the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</i>
DP41 Flood Risk and Drainage	<i>Sustainable Drainage Systems (SuDS) should be implemented in new developments unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality. Arrangements for the long term maintenance and management of SuDS should also be identified</i>

5.29 The policies above are assessed in full within Chapter 6.

Cuckfield Neighbourhood Plan 2011 – 2031

5.30 The referendum for the Cuckfield Neighbourhood Plan took place in Summer 2014 and was formally adopted on 1st October 2014, and therefore comprises a material consideration when determining planning applications within Cuckfield.



Cuckfield Neighbourhood Plan Area

5.31 The following policies of relevance to the application are:

Policy	Extracts
CNP1 Design	<i>New development in accordance with the Neighbourhood Plan will be permitted where it:</i> <i>a) Is designed to a high quality which responds to the heritage and distinctive character and reflects the identity of the local context of Cuckfield as defined on Map 3 - Conservation Areas and Character Areas, by way of; i. height, scale, spacing, layout, orientation, design and materials of buildings, ii. the scale, design and materials of the public realm (highways, footways, open space and landscape), and</i> <i>b) Is sympathetic to the setting of any heritage asset and</i> <i>c) Follows guidance in the Conservation Area Appraisals and Management Plans, the High Weald AONB Management Plan, and d) Respects the natural contours of a site and protects and sensitively incorporates natural features such as trees, hedges and ponds within the site, and</i> <i>e) Creates safe, accessible and well-connected environments that meet the needs of users, and</i> <i>f) Will not result in unacceptable levels of light, noise, air or water pollution, and</i> <i>g) Makes best use of the site to accommodate development.</i>
CNP5 Countryside Protection	<i>Outside of the Built up Area Boundary, priority will be given to protecting and enhancing the countryside from inappropriate development. A proposal for development will only be permitted where:</i> <i>a) It is allocated for development in Policy CNP 6 (a) and (b) or would be in accordance with Policies CNP 10, CNP 14 and CNP 17 in the Neighbourhood Plan or other relevant planning policies applying to the area, and</i> <i>b) It would not have a detrimental impact on, and would enhance, areas identified in the Cuckfield Landscape Character Assessment (summarised in Table 1) as having major or substantial landscape value or sensitivity, and</i> <i>c) It would not have an adverse impact on the landscape setting of Cuckfield and</i> <i>d) It would maintain the distinctive views of the surrounding countryside from public vantage points within, and adjacent to, the built up area, in particular those defined on Map 5, and</i> <i>e) Within the High Weald Area of Outstanding Natural Beauty it would conserve and enhance landscape and scenic beauty and would have regard to the High Weald AONB Management Plan.</i>

CNP16 Transport Impact	<i>Proposals will be permitted where they meet the following criteria: a) Safely located vehicular and pedestrian access with adequate visibility exists or could be created; and b) Development proposals would ensure sustainable transport links to the principal village facilities including the village centre, the primary and secondary schools and recreation open space are provided; and c) Where adequate transport infrastructure is not available to serve the development, the development would provide, or contribute towards, appropriate measures which will address the identified inadequacy and assist walking, cycling, public transport and other highway improvements; and d) Where development would add to traffic congestion in the village or inappropriate traffic on rural lanes, proposals should be brought forward to mitigate any traffic impact or contribute funding towards local transport schemes e) Development proposals for new developments should include secure cycle storage and ideally storage for children's buggies and mobility scooters where appropriate f) Development proposals would maintain or enhance the existing routes of the twittens (public rights of way).</i>
CNP18 – New School Buildings	<i>Additional school buildings at Holy Trinity Primary CE (A) School and Warden Park Academy will be permitted within the Built Up Area Boundary.</i>
Page 74	<i>'The school aims to construct an artificial pitch with modern lighting to the southwest of the current auditorium/gymnasium. This would include some small storage sheds. This would be a generally open use appropriate to it being outside the built up area boundary. The character area forms part of the undeveloped, treed, southern edge to this part of Cuckfield and the impact of any lighting should not have an adverse impact on the landscape setting of the village. The means of lighting should be unobtrusively sited and well screened by landscaping or other site features and the design and specification of the lighting should minimise glare and light spillage.'</i>

- 5.32 Overall, the site has been identified as a potential site for an artificial pitch and is therefore supported by the Neighbourhood Plan.

6. MATERIAL CONSIDERATIONS

6.1 The key material planning considerations arising from the proposed development (in light of the planning policy context outlined within the preceding section of the Statement) are considered to be as follows:

- Principle of development;
- Impact on the character and appearance of the area;
- Impact on the amenity of neighbouring properties;
- Impact on the highway and the adequacy of car parking in the area; and
- Other matters.

6.2 Paragraph 6 of the NPPF states that decisions 'must be taken in accordance with the development plan unless there are material considerations that indicate otherwise'. Accordingly, the proposal is assessed in terms of its compatibility against the policy provisions outlined in Section 4 and other material considerations – all of which are discussed below.

Principle of Development

Background

6.3 The proposed development is located within an area which is currently utilised for sports and recreation, and is located within the boundary of Warden Park School. The principle of development is this location has been considered against relevant national and local planning policy below:

Assessment

National Policy

6.4 The proposed development is considered to be in accordance with the aims and objectives of the National Planning Policy Framework (NPPF) for the following reasons:

- The proposal is considered to accord with the requirements of paragraph 6 in that the development would be of a sustainable nature, considering that it is for the improvement / upgrading of existing facilities for the community.
 - Paragraph 7 of the NPPF highlights how there are three critical dimensions to sustainable development – economic, social and environmental. The proposal is considered to embrace all three dimensions of sustainable development in the following ways:
 - (i) The proposals would ensure that the sporting facilities are modernised and enhanced, increasing the vibrancy and vitality of the area;
 - (ii) The upgrading of sporting facilities would provide wider social benefits through the increased participation in sporting activities;
 - (iii) The proposals involve the improvement and adaptation of existing facilities. The environmental benefits of the proposed scheme would therefore emerge from the re-use of existing brown field land and enhancement of existing facilities, rather than the resource hungry option of creating new facilities on greenfield land elsewhere.
 - The NPPF sets out twelve core planning principles in paragraph 17 which should underpin both plan making and decision taking. The proposed development is considered to embrace all of the stipulated principles. The principles of most relevance to the proposed development relate to (i) supporting the transition to a low carbon future in a changing climate, and encouraging the reuse of existing resources, and (ii) to take account of, and support, local strategies to improve health, social and cultural well being for all.
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- Paragraph 73 of the NPPF positively encourages access to high quality open spaces for sport and recreation, and acknowledges its important contribution towards the health and well being of communities. The proposed development is accordingly considered to be in line with the aims of national policy.
- National policy supports the retention of existing open space, sports and recreational buildings and land (NPPF paragraph 74), unless the development is for alternative sports and recreational provision, the needs for which outweigh the loss. The proposed development will not result in the loss of open space or sports facilities, and relate only to the reconfiguration and upgrading of existing facilities. Accordingly, the proposals are considered acceptable in policy terms.
- The proposals are considered to be in accordance with the aims of NPPF paragraph 81 which seeks to provide increased opportunities for outdoor sport and recreation.
- The proposal to upgrade sports and recreation facilities is considered to be in accord with NPPF paragraph 171 which prescribes the Local Planning Authority's requirement to take health and wellbeing into consideration and the needs of the local population for sports and recreation.

Local Policy

- 6.5 With regards to the Adopted Local Plan, Policy R5 sets out that proposals for artificial turf pitches will be permitted where there is no unacceptable impact on the amenities of neighbouring residents.
- 6.6 The application documents submitted in support of the application show that the nearest neighbours are located 100 – 200 m away and will therefore not be effected by the proposals in terms of noise or lighting. Therefore, it is considered that Policy R5 is met.
- 6.7 Moreover, emerging Policy DP22 states that proposals which result in the loss of leisure facilities will not be permitted unless:
- *an assessment has been undertaken which has clearly shown the cultural facility, open space, sports land or recreational building to be surplus to requirements; or*
 - *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
 - *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*
- 6.8 The proposal meets both criteria above, by virtue of the second bullet point in that the artificial pitch will replace an existing natural turf playing field with a FIFA and FA compliant pitch with footprint of 97m x 61m. In addition, the proposals will increase the quantity of sport able to be played on the playing fields (through the provision of floodlighting and allowing sport to be played during times of inclement weather).
- 6.9 Moreover, the construction of an artificial pitch at Warden Park Academy has been considered in the Cuckfield Neighbourhood Plan and sets out that any development would be supported as long as issues such as lighting are assessed within the application. The lighting spill diagram shows clearly that the only property that falls within the lightspill of the floodlights is the school building itself – which would not be materially impacted by such lightspill, and is accordingly considered compatible and acceptable.

Interim Summary

- 6.10 In terms of the principle of development it is considered, and has been evidenced, that:

- The proposals are within an area currently utilised for sports and recreation, and are located in and around existing community facilities;
- National policy encourages access to open spaces for sport and recreation, and acknowledges its important contribution towards the health and well being; and
- The proposals increase the quantity of sport able to be played on playing fields (through the provision of floodlighting and allowing sport to be played during times of inclement weather), and moreover, are proposed to be built to best practice (FIFA and FA) standards.

6.11 In light of the above, it is considered that the principle of enhanced sports facilities in this area is acceptable, subject to detailed design and amenity credentials being acceptable.

Impact on the Character and Appearance of the Area

Background

6.12 Policy B1 of the Adopted Local Plan outlines the general design guidelines within the District. Prior to assessing the proposals against this policy, it is important to state that the site is not located within a Conservation Area or a Special Landscape Area, but rather is located within an area utilised for community, sports and recreation use. It is accordingly considered that the impact of the proposals on the character and appearance of the area should be assessed in this context.

Assessment

Pitch Surface

6.13 The proposed synthetic sports pitch is of a similar appearance to amenity grass and therefore aligns with the existing character of the area. Playing pitches on the remaining playing field will also be maintained post development.



Indicative Surface Image

6.14 It is considered that the introduction of an artificial turf pitch will not have any additional impact upon the character and appearance of the surrounding area when compared with the existing playing field.

Fencing and Floodlighting

- 6.15 In terms of visual impact, the pitch (and associated fencing and floodlighting) has been sensitively located to the south of the existing school buildings and playing fields, whilst retaining all nearby trees. The mesh fencing and posts are galvanised steel and then powder coated in green to allow the fence system to blend into the natural surroundings. The fencing is proposed to be of a height of 3m with some parts being 5m. The Floodlighting will comprise of 8 no. 15m high columns.
- 6.16 The potential for visual impact from light spillage and pollution has been also been assessed. The floodlights proposed are A3 Maxi sports floodlights which feature flat style optics designed to reduce upward waste light and overspill. The Light Spill Diagram demonstrates the effect that the lighting will have on the surrounding area. As a result, it is not considered that a Lighting Impact Assessment is necessary due to the location of the pitch being 100m - 200m to the nearest residential property.

Interim Summary

- 6.17 In terms of the impact on the character and appearance of the area, it has been demonstrated that:
- the site is located within an area which is currently utilised for sports and recreation and should accordingly be considered in this context;
 - the artificial turf pitch is of a similar appearance to the existing playing field, and is therefore not considered to have any additional impact upon the character and appearance of the surrounding area;
 - in terms of visual impact, the pitch (and associated fencing and floodlighting) has been sensitively located ensuring that all trees on site are retained;
 - the mesh fencing and posts are galvanised steel and then powder coated in green to allow the fence system to blend into the natural surroundings;
 - the site is surrounded by a large amount of established and mature vegetation – which will screen the proposed structures, and minimise the visual impact of the proposals;
 - the Light Spill Diagram demonstrates that the proposed floodlighting is considered acceptable in terms of any night time impact on the character of the site and surrounds.

Residential Amenity

Background

- 6.18 With regards to this proposal, the potential for impacting upon residential amenity principally relates to noise impacts from the proposed use of the pitches and potential for light pollution. These potential impacts are addressed in turn below.

Noise

- 6.19 It is proposed that the sports facilities would be used between the hours of 0800 – 2200. To put the proposals into perspective, it should be noted that the site is of an existing, lawful, and uncontrolled use as pitches/sports facilities - uses which can continue without conditional planning control. Accordingly, it should be noted and factored into any evaluation that the increase in the operational use of the new facility when compared with the existing position will be limited in extent and degree - only comprising a few extra hours a day in a few weeks in the year (during autumn / winter). Moreover, as the LPA have stated on other applications for similar proposals the amount of activity that can take place at any one time would be materially similar to the existing position. An Officer's assessment (LPA Ref: DM/15/2736) of a similar application for a 3G pitch with regards to neighbour amenity is extracted from the Delegated Report for said application below:

"Whilst the proposed artificial pitches would allow greater use of the pitches as they would not suffer from wear or drainage issues in the same way as the current grass pitches, the amount of activity that can take place at any one time on the site would be similar to that which exists at present. It is therefore not considered that there would be a significant adverse impact on the nearest residential properties from the uses taking place at the site."

- 6.20 This puts the potential for impact on both neighbouring properties as a whole into perspective.
- 6.21 Notwithstanding the above, and in any case, the nearest residential properties are located in excess of 100m – 200m from the proposed pitch, with intervening school buildings, and significant mature vegetation providing a buffer against any potential noise impacts.
- 6.22 The Community Use Agreement will set out further details in respect of user details. This management of the facilities will ensure that noise disturbance during use can be managed and effectively minimised.

Lighting

- 6.23 The introduction of floodlights will enable the new pitch to be used during the evenings in autumn / winter months where daylight hours are limited. Whilst the floodlights will have some impact in terms of darkness, the floodlights have been designed in such a way as to minimise this. As noted above the new pitch is removed from existing nearby residential properties, being approximately 100m – 200m from the nearest dwelling. The pitch is moreover surrounded by a large amount of vegetation which would further mitigate light emissions.
- 6.24 In relation to the hours of use of the lights, it is proposed that these stay on for 30 minutes following latest time of play (i.e. the lights stay on until 2230 following the end of play-time at 2200) to allow equipment to be packed away and the facility closed, ensuring that it is safe and secure. Unlike older specification floodlights which are either on or off, the proposed floodlights can be zoned, so can be switched on either a 1/4, 1/2, 3/4 or whole pitch, so the light spill impact on residents can be mitigated after 10:00pm by appropriate control and management.
- 6.25 It is respectfully suggested, as has been the case on other similar proposals (e.g. LPA Ref: DM/15/2736), that a condition could be attached restricting the hours of usage of the floodlights, to ensure that the lighting will not have an adverse impact on the surrounding area in terms of light pollution and nuisance.

Interim Summary

- 6.26 Insofar as residential amenity is concerned, it is considered that the policy test in B3 has been met, and the following has been evidenced:
- the site is of an existing, lawful, and uncontrolled use as pitches/sports facilities relating to the Academy - uses which can continue without conditional planning control. Notwithstanding this, it is not considered that the use of the synthetic turf pitch is likely to generate any greater potential noise disturbance than is already experienced by local residents;
 - the nearest residential properties are located a considerable distance from the proposed pitch, with significant mature vegetation providing a buffer against any potential noise impacts;
 - the potential for nuisance arising from light spillage and pollution has been assessed and it is considered that the proposed floodlighting is acceptable; and
 - The pitch is moreover surrounded by a large amount of vegetation which would further mitigate light emissions.
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Highways and Access

- 6.27 The proposals do not include any alterations to the existing permanent access – the current access to the site via an unnamed road off Broad Street.
- 6.28 The proposals relate to upgrading of existing facilities rather than the provision of new facilities. Given that there would be no increased capacity as a result of the provision of the upgraded pitch, and the parking capacity will remain the same, there is expected to be no overall increase in the maximum number of person or vehicle trips generated as a result of the proposed development. It is accordingly not considered that the proposal would result in an increased need for parking spaces, or any material intensification of vehicular access.
- 6.29 An Officer's assessment (LPA Ref: DM/15/2736) of a similar application for a 3G pitch with regards to highways is extracted from the Delegated Report for said application below:

"The Highway Authority raises no objection to the application as the proposal would not worsen any existing capacity issues. Whilst the artificial pitches will allow the site to be used in the future during adverse weather conditions at times when the present grass pitches would be unusable, the amount of activity taking place at the site at any one time would not be increased as the physical capacity of the site would be the same as at present. On this basis it is felt that both the site specific policy RA7 is met as well as policy T4 in the MSLP and policy DP19 in the emerging District Plan. The NPPF advises that planning applications should only be refused on highway grounds where the residual impact of proposals is severe; it is not considered that this is such a case."

- 6.30 It is accordingly considered that the proposal is acceptable in terms of highways and access.

Other Matters

- 6.31 Flood risk and drainage: The site is located within Flood Zone 1 (Low risk of flooding from rivers and seas). The new pitches are porous and drainage from them will replicate the existing greenfield conditions. It is considered that the drainage information submitted indicates that the site can be satisfactorily drained, thereby complying with policy CS13 of the MSLP and policy DP41 in the emerging District Plan.
- 6.32 Ecology: The report by PJC Consulting has assessed the site for any potential protected species on site. The report concludes that the proposals will not have an adverse effect on habitats or species. General site enhancements have also been set out in the report, for example, instillation of bird and bat boxes with the aim to improving ecological value of the site post development.
- 6.33 Trees: The boundaries of the site are enclosed with hedgerow and trees. It is not proposed to remove any trees in order to develop the site, and the proposals are sufficiently distanced from any trees to ensure that their roots are adequately protected.
- 6.34 Community benefits: The proposal will bring about a clear benefit to the Academy and to the wider community by allowing the site to be used for matches and training at times when the present grass pitches would be unplayable. Paragraph 9.40 of the MSLP states "The Council recognises that facilities accommodating local leisure, recreation and community activities play a vital role in contributing to the well being of the local community". Paragraph 73 of the NPPF states "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities". It is considered that the proposal would comply with the above aims and this is a factor that weighs in support of the application. The proposal would comply with policy R5 of the MSLP by virtue of providing enhanced sports facilities.
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7. SUMMARY AND CONCLUSIONS

Purpose of this Statement

- 7.1 This Planning Statement outlines the context within which the application is made, and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development. The detailed assessments undertaken and reported are considered to allow the proposals to be viewed favourably.

Summary of Key Considerations

- 7.2 In summary, on the basis of a comprehensive review of both the policy and physical context of the application site, it is considered to be suitable for the proposed development for the following reasons:

- In terms of the principle of development it is considered, and has been evidenced, that:
 - The proposals are within an area currently utilised for sports and recreation, and are located in and around existing community facilities;
 - National policy encourages access to open spaces for sport and recreation, and acknowledges its important contribution towards the health and well being; and
 - The proposals increase the quantity of sport able to be played on playing fields (through the provision of floodlighting and allowing sport to be played during times of inclement weather), and moreover, are proposed to be built to best practice (FIFA and FA) standards.
 - In terms of the impact on the character and appearance of the area, it has been demonstrated that:
 - the site is located within an area which is currently utilised for sports and recreation and should accordingly be considered in this context;
 - the artificial turf pitch is of a similar appearance to the existing playing field, and is therefore not considered to have any additional impact upon the character and appearance of the surrounding area;
 - in terms of visual impact, the pitch (and associated fencing and floodlighting) has been sensitively located ensuring that all trees on site are retained;
 - the mesh fencing and posts are galvanised steel and then powder coated in green to allow the fence system to blend into the natural surroundings;
 - the site is surrounded by a large amount of established and mature vegetation – which will screen the proposed structures, and minimise the visual impact of the proposals;
 - the Light Spill Diagram demonstrates that the proposed floodlighting is considered acceptable in terms of any night time impact on the character of the site and surrounds.
 - In terms of flood risk it is considered, and has been evidenced, that the site does not fall within a flood risk area.
 - Insofar as residential amenity is concerned, the following has been evidenced:
 - the site is of an existing, lawful, and uncontrolled use as pitches/sports facilities relating to the Academy - uses which can continue without conditional planning control. Notwithstanding this, it is not considered that the use of the synthetic turf pitch is likely to generate any greater potential noise disturbance than is already experienced by local residents;
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- the nearest residential properties are located a considerable distance from the proposed pitch, with significant mature vegetation providing a buffer against any potential noise impacts;
 - the potential for nuisance arising from light spillage and pollution has been assessed and it is considered that the proposed floodlighting is acceptable; and
 - The pitch is moreover surrounded by a large amount of vegetation which would further mitigate light emissions.
- The proposals relate to upgrading of existing facilities rather than the provision of new facilities. Whilst the new pitch does enable a more intensive use of the site, the site is in a sustainable location already served by an existing car park which would be utilised for users of the pitch, and it is accordingly not considered that the proposal would result in an increased need for parking spaces, or any material intensification of vehicular access.

Conclusion

- 7.3 Having regard to the above key considerations, it is considered that the proposed development is fundamentally sound in principle and represents an appropriate and policy compliant scheme, which seeks to create a qualitative improvement to the sporting facilities currently on site.
- 7.4 Having regard to the considerations outlined in this statement, the applicant respectfully contends that the proposal is acceptable in all regards, and planning permission ought to be granted.
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Appendices

Appendix 1 Letter to residents (3rd Dec 2015)

Appendix 2 Sport England Response (GJP Jan 2016)

Appendix 1

Letter to residents (3rd Dec 2015)



Warden Park

'The Best From All'

Headteacher: Jonathan Morris, BA (Hons) NPQH

3rd December 2015

Dear Resident

Update on Warden Park Academy's proposal to build a 3G sports pitch for student and community use

You will no doubt be aware of this aspiration, following two letters and an information session in the last 18 months. The time has now come for us to further update you.

You are cordially invited to attend a drop-in meeting at Warden Park Academy, Broad Street RH17 5DP on Monday 14th December 2015, from 4.00pm to 6.30pm. You will be able to meet the academy team developing the project, hear information, view indicative drawings showing the proposals and ask questions of us and our consultants about our plans for adding this much needed facility to the school and community offering.

The school will be represented by senior staff and Directors. We look forward to meeting you and welcome your comments.

Yours faithfully

Jonathan Morris
Headteacher and CEO

Appendix 2

Sport England Response (GJP Jan 2016)

1 INTRODUCTION

Purpose of Note

- 1.1 This Sport England Response Note is intended to provide an overview of, and context to, the proposals – in relation to the relevant Sport England's Playing Fields Policy - 'A Sporting Future for the Playing Fields of England' Policy Exception.
- 1.2 The proposals are assessed within the context of Sport England's specific information requirements related to Policy Exception E5 – which is applicable in the following scenario:

E5 – Sports facilities: *"The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields."*

The Proposals

- 1.3 The proposals comprise:

'Proposed synthetic turf pitch, floodlighting, fencing, drainage, and ancillary works'

- 1.4 Before addressing the Policy Exception information requirements, it is considered important to outline the underlying rationale and need for the proposals. In this regard, the following is the case:
 - This application seeks full planning permission for the redevelopment of part of the existing natural turf playing fields to provide a modern, FIFA compliant synthetic grass surfaced, 3G sand and rubber crumb filled sports pitch with perimeter fencing, floodlighting and associated features;
 - This redevelopment is important to Warden Park Academy as the School does not have sufficiently available or accessible all weather pitches for pupils.
 - In addition to providing the School with compliant state of the art sports facilities to meet the demands of the School itself, the facilities will also be offered to the local community during evenings and weekends when available. Accordingly, the completed facilities would naturally offer significant community benefits as well as meeting the direct requirements of the School itself.
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2 ASSESSMENT OF PROPOSALS

- 2.1 The following table provides a response to the information likely to be required as part of their assessment of the application against this Policy Exception:

Assessment against Policy Exception E5: Sports Facilities	
What is the impact on the existing playing field land in terms of the number of pitches the site can accommodate and their capacity?	The proposed development would not result in a reduction in the capacity of natural turf pitches on site. Although there will be a loss of a natural turf pitch through the provision of the synthetic turf pitch, there are other natural pitches at the School and therefore it is considered that the provision of a synthetic turf pitch is appropriate.
Will all existing users of the playing field land still be adequately accommodated within the site?	All existing users (who comprise the School themselves) will be adequately accommodated by the sports facilities which will provide an enhancement of the sporting facilities within the school site. Furthermore, the development will only result in the loss of one turf pitch.
What is the view of the sports national governing bodies whose playing pitch provision may be adversely affected?	N/A
Is the playing field land proposed for development of a particularly high quality or of particular importance to the development of sport in the local area?	The proposed area of development is not available for use during times of inclement weather or during the winter months. Therefore, the provision of the synthetic turf pitch will provide all weather facilities for users, which will enable greater sporting participation throughout the year. The proposed pitch is considered policy compliant as an additional existing natural turf pitch within the grounds will be retained.
Is there evidence that the proposed facility has been carefully located to minimise any adverse impact on the playing field land? For example, has an assessment of alternative sites been undertaken?	The proposed site has been identified within the Cuckfield Neighbourhood Plan and the principle of the proposals were confirmed as acceptable in pre-application discussions with the Local Planning Authority.
Will the proposed facility help to meet an identified sporting need i.e. as set out in a needs assessment or Playing Pitch/Sports Facility Strategy?	The scheme has been designed to meet the direct requirements of the School which has a curricular need for football use throughout the year.
Does the proposed facility help to deliver the plans and strategies of the relevant sports national governing bodies and does the application have their support?	The design and proposals in general are set against the following design standards: • The FA Guide to 3G Football Turf Pitch Design Principles and Layout; and • Sport England – Competitive Sizes of Sports Pitches and Courts (Sept 2015).
Will the proposed facility duplicate any existing provision within the local catchment area?	The scheme seeks to provide a direct requirement from the School for an all-weather pitch that can be used throughout the year for football. In addition, local football clubs such as Cuckfield Comos FC and Cuckfield Rangers FC have also shown an interest in using the facilities as their current facilities do not provide an all-weather synthetic turf pitch.
Does the proposed facility meet with Sport England's and the relevant sports national governing body design guidance?	The proposed pitch is in accordance with the design guidance of both Sport England and FA guidance.
Will the proposed facility be available for use by the local community? Will this use be secured and managed on a formal basis i.e. through the development and implementation of a community use agreement?	A Community Use Agreement will be drawn up by the school which will offer the use of the facilities for evening, weekend and holiday use. This project will provide a specialist all-weather PE teaching facility for pupils from 4 - 18. This project will allow greater use by more pupils as well as local clubs such as Cuckfield Comos FC and Cuckfield Rangers FC who will both utilise the pitch for their own training and matches.

Does the design of the proposed facility allow for adequate storage, changing provision and access to allow for community use?
It is proposed that the existing changing facilities and storage provided by the School will be utilised for players of the new pitch.
Is the proposed facility supported by the existing and potential future users of the site e.g. local sports clubs?
Meetings have been held with a number of different local sporting clubs, county associations and community clubs in order to develop the proposal and to maximise the advantages that the facility will bring to the community. Two local football clubs have shown an interest in using the pitches for training and games (outside school hours). The Community Use Agreement will formalise this agreement.
Is there evidence that the proposed facility will be linked into the wider sports development network? Will a sports development plan be produced and implemented for the facility?
The scheme is designed to meet the direct requirements of the School where the sports facilities are used throughout the year as well as providing facilities for local sports clubs.
For applications on school sites, is there evidence that the proposed facility will lead to an increase in PE in the curriculum and the development, or further development, of after school sports clubs and school club links?
The proposed development will increase sport participation amongst pupils. The pitch will be able to be used in all weathers and longer hours – particularly in the winter months with the use of floodlights. The facility will provide high quality PE training for both school and other local teams. This will have a positive impact on the number of children participating in school based sport and then onto local clubs.
Are appropriate arrangements proposed to ensure the long term maintenance of the facility?
A Maintenance Machine and Specialist Maintenance Package will be set out and agreed as part of the proposals.
Is there evidence to suggest that the sporting benefits that will arise from the proposed development are unlikely to be obtained in any other way in the foreseeable future?
Mid Sussex DC Playing Pitch Strategy (2015 – 2031) sets out that football in the district is the most popular sport with 1,926,900 people actively playing football. The provision of an all-weather synthetic turf pitch will result in further accessible and suitable football facilities to be provided and for use of both the school and local clubs. The provision of a new ATP pitch in this location is supported by the Playing Pitch Strategy (Para 11.1.2).
What is the sporting rationale behind the choice of surface proposed and what sports and activities is it envisaged the facility will accommodate?
There is an established need for an all-weather pitch for football use within the school and the local community.
How will the provision of the facility benefit the current sporting users of the playing field land (e.g. school and club use)?
The provision will allow the School to create access to top level facilities for all students which can be used throughout the year as well as by local clubs and football teams. The scheme will also help to free up the existing pitches and natural turf pitches.
Will the provision of the facility help to enhance the quality of the remaining playing field land e.g. by moving training activity off a grass playing pitch and onto the artificial surface?
The proposed pitch will reduce the use of the natural grass turf pitches on site and minimise damage, particularly during periods of inclement weather.
Is sports lighting proposed and is it likely that its use will be restricted due to the proximity of residential properties or sensitive areas (e.g. Green Belt or Conservation Areas)?
The proposal includes floodlighting to the synthetic turf pitch. A lighting spill diagram has been prepared and submitted with the application demonstrates that there would be no adverse impact upon the amenities of neighbouring residential occupiers or on any wildlife and ecology within nearby trees. Accordingly it is not considered that the use of the floodlights would be restricted in a manner which would prejudice the use of the facility to its full potential.
To ensure the long term benefit of the facility will a sinking fund be established to ensure the appropriate replacement of the artificial surface and/or sports lighting?
A Sinking Fund will be established in order to secure the replacement of the pitch.

3 CONCLUSION

- 3.1 Having regard to the above key considerations, it is considered that the proposals have covered, addressed and thoroughly satisfied all Sport England Playing Fields Policy considerations relevant to the proposals.