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30th April 2025

Gravesham Borough Council
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

FAO Kelly Joyce (Senior Planning Officer)

NORTHFLEET SCHOOL FOR GIRLS – APPLICATION FOR CONSTRUCTION OF FLOODLIT 3G PITCH
PLANNING REFERENCE NUMBER - 20250028

Dear Kelly,

Thank you for keeping me informed of the consultee responses during the planning process. I have consulted the applicant on all matters arising and our responses are shown below.

1) Sport England Response dated 1st February 2025

We can confirm that;

- There will be a geotextile membrane installed before the stone is placed.
- There will be a robust maintenance programme adopted to ensure the carpet is kept in top condition and meets warranty requirements. The project is being substantially funded by the Football Foundation and they will themselves insist upon similar measures to protect the public investment.
- There will be rubber infill containment measures (kick boards fixed to the base of the fence, gratings outside the gates and boot brushes outside the gates). There will also be filtration/traps to ensure the infill does not enter the drainage system and natural environment.
- The School are in the process of producing a community use agreement which they will forward to you once drafted.
- The carpet pile will typically be a 50mm to 60mm pile length 3g carpet suitable for football with the final product specification being the tenderers design to meet FA performance requirements.

- With regards a sinking fund, the School will pay the Football Foundation an annual sum of money which the Foundation will hold in readiness for a carpet replacement at the end of its service life.

2) GBC Environmental Protection Response dated 10th February 2025

- Following receipt of this response, the applicant commissioned a noise impact assessment which is attached. The report has concluded that if a 3m high acoustic fence is erected at the northern end of the proposed pitch (returned around each pitch corner) then noise levels will be within acceptable levels. The applicant will be installing the acoustic fence and we attach a revised drawing to show its location as recommended in the noise impact report. An illustration of the type of fence is shown in Appendix 1 although this may vary depending on the successful contractors final design (assuming planning is granted). The client does not wish to alter the operation hours of the pitch from that shown in the application.
- Whilst we are aware of the lighting levels recommended in EN 12193, the design for the project is based on the requirements stipulated by the FA for all football foundation framework pitches i.e. 200 Lux. The client will have the option of switching the lighting levels down to 120 Lux for training purposes.

3) KCC Flood and Water Management response dated 11th February 2025 and Southern Water Response dated 29th January 2025

- In a joint response to both consultees, the applicant has commissioned a BRE 365 survey on site to assess the viability of soakaways to connect the pitch drainage system into rather than into the main sewer on site. Following the survey on site and if feasible, the drainage strategy will be amended to take into account the SUDS solution. The survey was undertaken on 28th April and the results are looking promising for soakaway construction. We await the final report which will be forwarded to you along with the revised drainage strategy. The rainwater system from the sixth form building at the other end of the site is connected into a soakaway. We will take into account the location of any soakaway in relation to the pitch and the recommendations for a site with chalk sub soils.

4) Kent Ecological Advice Centre response dated 12th March 2025

- The applicant notes the request for a bat walkover survey and has consulted the project Ecologist. The Ecologist has informed the applicant that the survey is based on a window spread over seven months, finishing in October. From a construction point of view, the initial topsoil strip and cut and fill earthworks require fair weather conditions as does the subsequent synthetic surfacing work. Delaying the planning decision until October/November will in all probability delay works until the Spring of 2026. Whilst the client supports the protection of wildlife in all forms on site, the pitch build (subject to planning approval) is programmed for a summer 2025 build and delaying the works may result in Football Foundation funding being withdrawn.
- It is for this reason that we would like to put forward a proposal to undertake the walkover surveys augmented by static Bat detectors during May and June in order to confirm or not the presence of Bats. The two mitigation measures we propose if we detect bats are as follows;

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- 1) Our lighting designer has calculated the lux levels on the trees up to a height of 5m for the six column design submitted and has shown levels of 3 to 3.5 Lux. The trees to the north are 12m away from the proposed fence and the trees to the east are 6.5m away from the proposed fencing.

In order to reduce the Lux levels on the trees to a minimum whilst still illuminating the pitch to the same level and uniformity, we have redesigned the lighting system based on 8 No. 15m high columns (attached) with the colour temperature of the fittings reduced from 5700K to 4000K. 8 columns will reduce the rotation angles of the fittings and the result is that the maximum lux level on the trees to the north up to a height of 15m is 0.45 Lux and on the trees to the east up to a height of 15m 1.13 Lux. The vertical grids are shown on pages 26 to 29 of the attached design. The Football Foundation's requirement is for colour temperature of light fittings is 4200K-5700K. Our lighting designer has informed us that these low lux levels on the trees can still be achieved with 4000K light fittings by special coding of the drivers in the light fittings .

- 2) Trimming back the tree foliage to the northern and eastern elevations of the proposed pitch fencing. This will provide a wider corridor for bats and increase the distance of the foliage from the light overspill. The trimming will be undertaken following a professional survey to assess whether there are nesting birds in the canopies although we would anticipate it being undertaken in October, outside the bird nesting season.
- 3) We have considered moving the entire pitch towards the school to increase distance from the trees whilst still keeping the pitch inside the planning application red line. However, there is a large Oak tree to the SW corner of the proposed pitch which the arboriculturist has labelled as valuable and must be retained. We feel that moving the pitch closer to it, especially at the cut end of the proposed ground works will risk impacting on the root protection zone.

On other matters, we note you were awaiting replies from GBC Leisure & Resilience Manager (Communities) and STG Building Control Partnership. Please forward once you have received them and we will respond.

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APPENDIX 1

TYPICAL TIMBER ACOUSTIC FENCE

(MAY VARY DEPENDING ON TENDERERS PREFERENCE)



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