

Delegated Report

Planning Application

Planning Application No: 20221327

Location: Gravesend Rugby Football Club, Donald Biggs Drive, Gravesend
DA12 2TL

Description: New floodlighting to a natural turf rugby pitch including installation of four (4 no.) 10m high floodlight columns and relocation of four (4 no.) Existing lighting columns to proposed new pitch.

Applicant: McCarthy & Stone Retirement Lifestyles Ltd. And Gravesend Rugby Football Club.

Submitted Documents/Plans

Application form
Covering letter
Lighting details
100 Lux Lighting Design
Drawing no. 01 (site location plan)
Drawing no. 02 (existing site plan)
Drawing no. 03 (proposed site plan)
Drawing no. 04 (existing sports pitch site plan)
Drawing no. 05 (proposed sports pitch site plan)
Drawing no. GRFC E1 (column elevations)
Drawing no. GRFC S3 (lighting spillage results)
Drawing no. GRFC S4 (lighting spillage contours)

Relevant Planning History

20190076	Retention of the canopy and petanque facility to the north of the all weather playing pitch	Permitted	21.03.2019
20180407	**REVISED DESCRIPTION** Application for the variation of condition (iv) attached to planning permission reference number 19940742 to (1) Extend the times of use of the artificial playing pitch (currently permitted from 09:00 to 21:00 on weekdays, 09:00 to 18:00 on Saturdays and 09:00 to 16:00 on Sundays) to 08:30 to 21:00 on weekdays	Permitted	04.03.2019
20131092	Removal of four existing redundant	Permitted	20.01.2014

lighting columns and installation of six new 15 metre high galvanised steel floodlighting columns.

20130403	Retention of the three non-illuminated notice boards on Milton Road junction with Ellerslie.	Refused	02.10.2013
20110234	Application for the variation of conditions (iv) and (v) attached to planning permission reference number GR/93/31 to extend the permitted hours of use of the artificial playing pitch and the hours of illumination of the floodlights by an additional hour until 10 pm on Monday to Thursday (September-April).	Refused	23.12.2011
20101049	Siting of a portacabin for use as changing room for Bowls Club.	Permitted	31.01.2011
20080183	Retention of the car park barrier.	Permitted	12.06.2008
20060141	Conversion of property into a one bedroom flat and two bedroom maisonette.	Permitted	20.04.2006
20050915	Retention of car park barrier.	Permitted	14.12.2005
20040786	Erection of eight 10m high floodlighting columns around three of the tennis courts.	Permitted	01.03.2005
20040269	Erection of single storey rear infill extensions to form an enlarged cellar and disabled w.c. and construction of new ramp and steps at front for disabled access.	Permitted	10.05.2004
20040658	Erection of four low level floodlights for training area adjacent to Church Walk.	Permitted	03.09.2004
20000504	Application for variation of conditions (iv) and (v) of planning permission ref no. GR/93/31 to extend the hours of use of artificial playing pitch and hours of floodlighting to 23.00hrs on weekdays and 19.00hrs on Saturdays and Sundays.	Refused	01.12.2000
19990571	Erection of a new cricket pavilion to replace the existing.	Permitted	23.06.2000

19970762	Use of main hall as a pre-school playgroup between the hours of 0800-1600 hours Monday-Friday.	Permitted	13.01.1998
19970292	Erection of 1.5m high railings with pedestrian entrance gate on the eastern side of the access road off Milton Road Permitted Provision of a cattle grid. Refused	Split decision	24.06.1997
19960258	Change of use of the changing accommodation on part of the first floor of the building adjacent to the pavilion to a one bedroom staff flat, weight training room, physio's office and w.c.	Refused	25.06.1996
19940742	Application for the variation of condition (iii) of planning permission ref. no.GR93/31 to increase the maintained illuminance of the floodlights from 250 lux to 300 lux & variation of conds (iv) & (v) to extend the hours of use of hockey pitch & hours of floodlighting from 9.00 pm to 9.30 pm weekdays.	Permitted	26.06.1995
19940512	Continued use of part of the land for the storage of 2 no. secure storage containers.	Refused	31.10.1994
19810257	Erection of six pole mounted floodlights nine metres high to illuminate existing tennis courts	Permitted	18.05.1981
19800987	Erection of a single storey rear extension to pavilion to form barrel store	Permitted	18.12.1980
19800254	Erection of four pole mounted floodlights 14 metres high	Permitted	25.06.1980
19800204	erection of single storey building to form changing accommodation	Permitted	22.05.1980
19750600	Erection of a single storey drink store	Permitted	18.09.1975
19740682	Retention of racing pigeon club house.	Permitted	13.01.1975

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS08 – Retail, Leisure and the Hierarchy of Centres
- CS10 – Physical and Social Infrastructure
- CS12 – Green Infrastructure
- CS13 – Green Space, Sport and Recreation
- CS18 – Climate Change
- CS19 – Development & Design Principles

Paragraph 33 of the NPPF (2021) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 8 – Promoting healthy and safe communities
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- GBC Playing Pitch Strategy Final Assessment Report, June 2016; and
- GBC Playing Pitch Strategy and Action Plan, August 2016.

Consultations, Publicity and Representations

Consultees

Sport England

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (in particular Para. 99), and against its own playing fields policy, which states:

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as playing field a

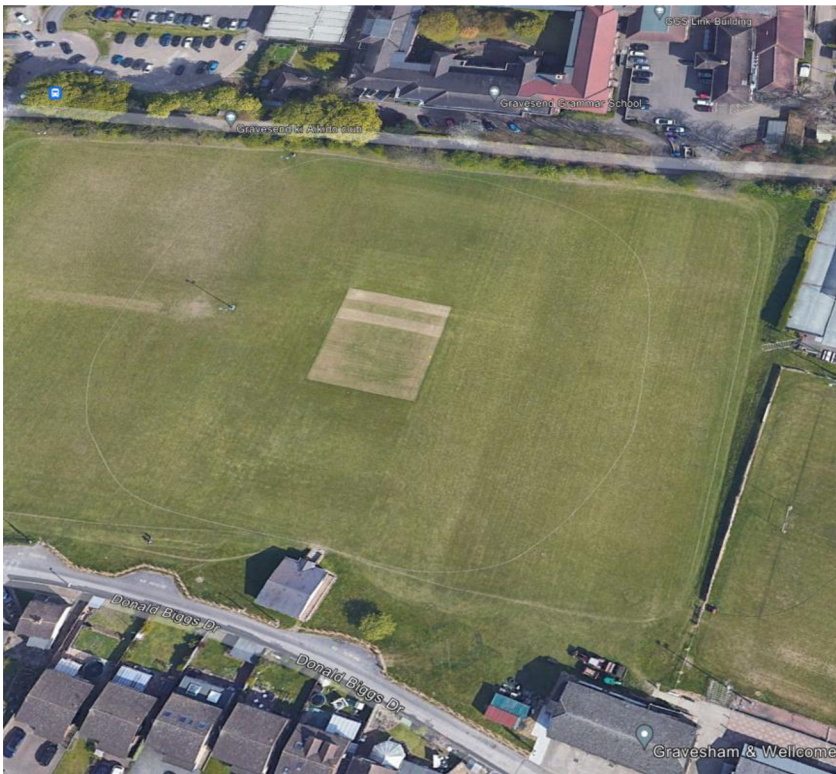
unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

The proposal is for new floodlighting to a natural turf rugby pitch including installation of four (4 no.) 10m high floodlight columns and the relocation of four existing floodlights on the playing field to this pitch. Proposals of this type are to be assessed against exception 2 of our policy that requires, 'The proposed development is for ancillary facilities supporting the principal use of the site as a playing field and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.'

The four proposed lighting columns on the north side of the pitch would be sited within the senior cricket pitch boundary and close to the cricket square. Although it is assumed that these columns would be demountable outside of the winter season, as is the case with the nearest existing column in the training area that would be one of those relocated, there is no information within the application to confirm that assumption. That being the case, Sport England is currently unable to determine that the proposal would meet exception 2 in this regard.



In assessing the application, I have consulted with the RFU. I would advise that the RFU received information related to the proposal prior to Sport England being consulted and also, appears to have had sight of a supporting letter that is not available on the Council's website. Other than what is quoted from that within the RFU's response, Sport England does not know its content.

The RFU has commented, 'The RFU has received the floodlighting design for the full pitch floodlighting proposal. It is stated as being 100lux (average) at 0.5 uniformity: fulfilling the requirements for community competition and training... The loss of the current small floodlit training area is mitigated by the full pitch solution within the proposal from an area perspective and will facilitate better training for more players. The floodlighting application supporting letter states "The current proposal there seeks to address this overplay on match pitches by enhancing the quality of an existing playing pitch to provide additional training capacity". This is repeated at Section 6.5.34 of the Planning Statement [to application ref: 20221328].

The RFU would comment that the provision of floodlighting to a full pitch (replacing a smaller floodlit training area), would not achieve an improvement in quality to match pitches (total pitch capacity of the site). The pitch that is receiving the floodlighting is a match pitch only as it has no floodlighting currently and would bear some additional use post floodlight installation. It is accepted that the statement at 6.5.34 of the Planning Statement would offer some alleviation through the displacement of some training activity from the current 1st team pitch. With reference to the above quality improvements could details of the stated 'improved..... drainage and levelling of the adjacent pitches' (Planning Statement 2.1.4) be provided please.

Conclusion

In light of the above, Sport England currently objects to the proposal as accordance with exception 2 of our policy has not been demonstrated in relation to the cricket pitch. In addition, further information is required regarding the 'drainage and levelling of adjacent pitches' to demonstrate that the floodlighting of the match pitch to allow it to be used more often, would not result in overplay, thus ultimately resulting in a reduction in its quality over time. Clarification is required on these matters.

The applicant responded with the following;

- Proposed Floodlight Columns – I can confirm that these will be demountable columns as with the existing, so there will be no impact on the senior cricket pitch or the cricket square. The proposal therefore accords with Exception 2; and
- Drainage and Levelling – The reference to the RFU's comments on drainage and levelling refers to the Planning Statement that accompanied the planning application for the proposed Care Home scheme (Ref: 20221328), and not the supporting statement for the Floodlight application. However, in terms of drainage, I can confirm that over the last few months the Club has implemented a drainage scheme (which did not require planning permission) in the existing car park to reduce the amount of surface water that reaches the pitches. The works have sought to improve drainage on the wider site to reduce pitch damage and turf instability.

In terms of the comments regarding possible overplay, creating a further floodlit pitch will in fact lessen the wear and tear on the main/1st XV pitch, which is also used on training nights due to lack of capacity currently. So, there will in fact be an improvement over the current arrangement, which is seen as a benefit of the proposed scheme.

Sport England have responded with the following:

On the basis of the additional information supplied by the applicant and provided to us on 7th March, Sport England is able to withdraw its objection to the proposal as it is considered to meet exception 2 of our Playing Field Policy.

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

Highway Development Management Officer

I have no highway objections. Times the floodlights may be used should be restricted the same as the existing installation.

GBC Leisure Services

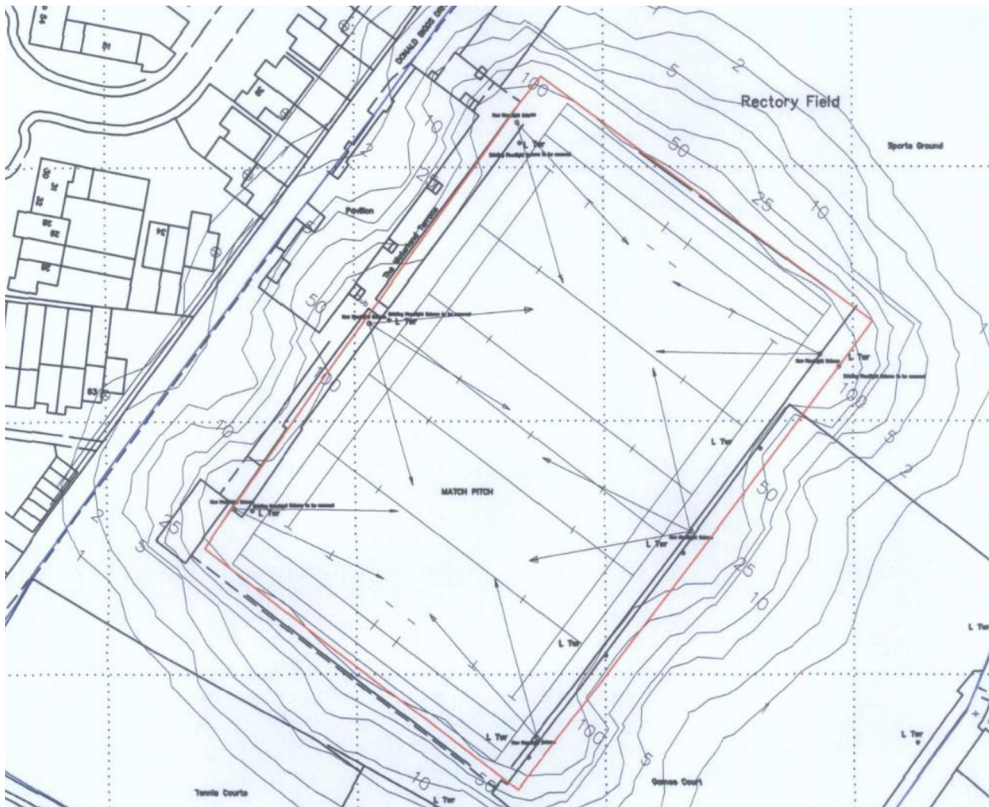
The application is supported for floodlights at GRFC which will help to mitigate the issues raised within the associated Playing Pitch Assessment in terms of quality of pitches, overplay issues and general enhancements of facilities at site for the benefit of local rugby development opportunities going forward.

Environmental Protection

Initial comments requested clarification regarding where the floodlights are being moved from and whether this leaves two floodlights at the originally floodlit pitch. If this is the case then the lighting contour/spill plans will need to include these as well so that the cumulative effect of the lighting can be assessed. As it stands, with the proposed four new plus the four relocated lighting columns on the new location, the lighting spill looks acceptable – lighting levels drop off well to almost nil at the boundary – particularly where there are houses. The residents will no doubt be able to 'see' the lights when looking out of windows etc but in terms of overspill, illumination of their premises in terms of nuisance etc, this should be fine.

Regarding noise we require clarification if two pitches are to be used? If so, this could lead to an intensification of use and potentially more noise. If only one pitch and the timings of the lights (so use of the pitch) are the same as that previously granted for the other pitch, then there shouldn't be a problem due to the slight relocation.

The applicant submitted a further plan showing light spill which helped clarify the situation. Looking at what is currently in situ as granted by 20131092, there will be a degree of overlap in the lighting. The existing lighting on that pitch does have more overspill beyond the boundary of the pitch area and some of this will spill onto the pitch where the new/relocated floodlight are proposed (see below). As such, it would be prudent for the lighting contour/overspill to be re-assessed to include the existing lighting on the pitch to the south (as granted by 20131092) to ensure that the cumulative effect does not impact on the nearby housing. It is recommended that a condition be applied to any planning permission that requires this to be undertaken and approved prior to the floodlighting being installed. The approved scheme should be being retained and any changes to it requiring a further planning application.



In terms of noise, although it is appreciated that there are not more pitches being put into use, the revised lighting will make the floodlit pitch more attractive and as such may have a much heavier use than the pitch previously only lit by four lighting columns. In addition, its location is much closer to the housing in Donald Biggs Drive than the previously flood light pitch, so again, there is the potential to bring noise closer to the housing. It would be advisable for a Noise Impact Assessment to be undertaken to assess the potential

noise from the use of the existing pitch with the relocated/new floodlighting. This could influence the hours of use.

The applicant has responded to these concerns below:

1. The reorientated pitch is designed to alleviate pressure on the existing training area by providing a greater floodlit playing surface. It is not expected that it will materially increase any usage over and above what is already in existence;
2. The new training area will alleviate usage of 1st XV pitch by shifting the load rather increasing usage;
3. Existing pitch is already in use at weekends and during the week (summer months) and so the additional requirement for floodlights is required primarily Sep-Mar only;
4. Noise levels from usage is unlikely to change as the existing pitches are currently used in the evenings (summer months) and daytime Sat/Sun; and
5. The floodlights on main pitch are available for use 4pm – 9.30pm Monday – Saturday.

Neighbouring properties

The application has been advertised by site notice and individual letters to 14 neighbouring dwellings.

Two letters of objection have been received. Main concerns:

- The covering letter says the proposal will provide additional midweek training capacity and retain informal space for age grade activity but removing the four existing floodlights will actually reduce capacity on the current pitch
- They will impact on the look of the area
- There is not one word about noise pollution in this proposal as though the only problem would be lighting.
- It's clear that this is a cynical and speculative proposal by McCarthy & Stone Retirement Lifestyles Ltd to remove the existing training pitch at the other end of the field in order to remove any possible noise and improve the outlook adjacent to their new retirement home proposal, just to move it somewhere else under the guise of improving facilities.
- As it stands the existing training pitch is sufficiently well sited away from domestic dwellings so as to not cause too much noise, the lighting is also not currently a problem, however if this goes ahead we will be subjected to the noise created; right outside our property and should it lead to increased use then this noise will be more constant and intrusive.
- In addition, if this proposal is aimed at increasing the amount of training on this pitch then I can see that there will be the problem of parking, much like Sunday mornings, that will become an issue.
- I also have some concern for the continuation of cricket on this pitch as it appears one of the lighting columns will be in a 'crease' and all of them appear to be permanent, that will make it difficult to play a game of cricket.
- It should be up to McCarthy & Stone to design and build their retirement home taking into account the current pitch, not move it out of the way.
- So all in all I feel this proposal should be rejected and if there is a genuine need to increase the use of the facility a long term plan should be created with all aspects taken into consideration rather than allow piecemeal consent that does not consider noise pollution or the bigger picture.
- This application is a step too far regarding additional floodlighting where neighbours are already subjected to lights from the all weather facility and the main pitch, the tennis club and Old Gravesendians
- The current facilities cause more than enough noise and light pollution
- There is no proposal to mitigate noise and light pollution and none exists currently
- There are regular breaches of the permitted floodlighting
- The club and houses have co-existed for a long time but the floodlighting is more recent and the neighbours should not be subjected to more

20 letters of support (2 from the same person)

- Club encourages sport, healthy living and team work to young people; the flood lights will help

support the club in doing this year round

- The lighting will allow a third pitch to be used throughout the season
- The lighting will be more energy efficient than the existing and provide minimal backlight as LED; more sustainable
- Expanding the lighting will bring more membership and finances that can be ploughed back into the CASC organisation as well as bringing more people into the community
- Benefits the Grammar School and other Kent schools
- Sporting facilities have a positive impact on the physical and mental health of local people

Officer's Analysis

Proposal

This application seeks planning permission for new floodlighting to a natural turf rugby pitch including installation of four (4 no.) 10m high floodlight columns and relocation of four (4 no.) existing lighting columns to proposed new pitch.

Existing:



Proposed:



The four relocated floodlights are shown below:



The proposed lighting columns will measure 10m in height, complete with climbing step hoops. The floodlights are proposed to be used between the hours of 16.00 and 21.30 on weekdays and Saturdays. This accords with the hours permitted under application 20131092 (Removal of four existing redundant lighting columns and installation of six new 15 metre high galvanised steel floodlighting columns).

The proposed and existing columns will each be mounted with 1500 watt Philips OptiVision BVP528 Gen 3.5 LED floodlight luminaires. The proposed installation will achieve an average maintained horizontal illuminance of 151 lux with a min/ave. uniformity factor of 0.51 and a min/max uniformity factor of 0.29.

The proposal will provide additional midweek training capacity, as well as retaining informal space for age grade activity.

Access and car parking would be as existing.

Principle

The site is not located within a designated area in the local plan and therefore the principle of development is acceptable providing it meets the objectives of the policies below.

Sport

In June 2016, the Council published its 'Playing Pitch Strategy Final Assessment Report', which was prepared by Knight Kavanagh & Page (KKP). The report presents a supply and demand assessment of playing pitch facilities to assess the adequacy of playing pitch provision in Gravesham.

With regard to rugby, and in particular Gravesend RFC the report identified overplay amounting to 8.5 match equivalent sessions at the Club. One of the main reasons for overplay is identified as training taking place on match pitches and mini teams playing on senior pitches. The report goes on to suggest that a practical way to help alleviate could be to install additional floodlighting at the Club.

The same recommendation is also made in the Council's 'Playing Pitch Strategy and Action Plan' (August 2016).

The current proposal there seeks to address this overplay on match pitches by enhancing the quality of an existing playing pitch to provide additional training capacity.

Sport England have not raised an objection to the proposal.

The general principle of the development is therefore considered to be acceptable and in accordance with Policy CS13 and the recommendations of the Council's playing pitch reports.

Design, Character and Appearance

The application site is a large playing field network that is home to pitches and facilities serving two rugby clubs, a football club, a hockey club, a tennis club, a bowls club and a cricket club. There is also a clubhouse and car parking.

The new and relocated floodlighting columns will be positioned around the re-orientated rugby pitch, which will be set out to the north of the existing artificial sports pitch and the existing rugby pitch, between Church Walk and Donald Biggs Drive.

The lighting columns will have a galvanised finish which will be visually less intrusive as they blend into the sky and surrounding landscape. They are not dissimilar to existing floodlights and lampposts and therefore do not introduce an alien feature into the street scene.

The picture below shows the current pitch:



This picture shows the floodlit pitch in the background granted permission under reference 20131092



Neighbouring Amenity



The main issues that will arise from such a proposal in relation to amenity is light spill and noise. The plan above shows the proposed light spill.

The applicant has stated that the lighting specification has been designed to minimise the visual impact of the development, and to comply with guidance on the reduction of obtrusive light. The horizontal mounted floodlights will reduce overspill and the visible area of the reflective surface, which results in a more efficient lighting system with less impact on the environment.

Whilst it will not impact on the properties to the northwest it will undoubtedly be visible. The adjacent pitch is also floodlit and there will be an overlap of light spill between pitches. However this overlap will predominantly occur on the pitch in front of the clubhouse and away from the nearest properties.

The floodlights will be adjacent to existing floodlights within the sports complex and can be conditioned to have the same hours of operation. The floodlights are proposed to have control switches and time clocks to ensure that they do not remain on later than the permitted time and this can be controlled by condition.

The applicant has stated that the level of use will not be significantly more than the existing situation as the number of pitches remains the same. The increase in use will come from the ability to use this pitch in the evenings during the winter. The adjacent pitch has floodlighting which is restricted by a condition to ensure lights are switched off by 9.30pm on weekdays and Saturdays and are not used at all on Sundays. It is reasonable to impose an identical condition to this application for a pitch adjacent to this. Undoubtedly there will be an increase in noise and activity on the pitch in the winter months when the floodlights are in use however this is not considered to have a significant impact on the amenity of surrounding properties as windows and doors are likely to be closed and gardens not in use. The noise during the summer, due to the number of pitches remaining the same, will not change because of the floodlighting.

The proposed floodlights therefore accord with policy CS19 of the Gravesham Core Strategy 2014 and para. 130f of the National Planning Policy Framework 2021 with regards to amenity.

Parking and Highways

The proposed floodlights will have no detrimental impact on parking or highway safety and therefore no objection is raised.

Conclusion

The proposed relocation of four floodlights and installation of four additional floodlights will have no detrimental impact on the character and appearance of the area, amenity of neighbouring properties, parking or highway safety and therefore accords with the above mentioned policies and is recommended for approval.

Recommendation:

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Mrs Alison Webster	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	29 March 2023	Dated:	6th April 2023