



Planning Department
Gravesham Borough Council

Our Ref: LJ/16619
Planning Portal Ref: PP-11592683

Via Planning Portal

30 November 2022

Dear Sir or Madam

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

GRAVESEND RUGBY FOOTBALL CLUB, DONALD BIGGS DRIVE, GRAVESEND, KENT, DA12 2TL

Please find enclosed a full planning application for the above works at the Gravesend Rugby Football Club. The application is submitted on behalf of our client, McCarthy & Stone and Gravesend Rugby Football Club and comprises the following documents and plans:

- Application Form;
- This Supporting Letter;
- Drawing Number 22.151.01: Site Location;
- Drawing Number 22.151.02: Existing Site Plan;
- Drawing Number 22.151.03: Proposed Site Layout Plan;
- Lighting Design Report by Highlights Floodlighting Ltd.;
- Drawing Number GRFC S4: Training Pitch Spillage ISP Contours;
- Drawing Number GRFC S3: Training Pitch Spillage Results;
- Drawing Number GRFC E1: Proposed Column Elevations;
- Manufacturer details of Floodlighting Sheet 1 of 2;
- Manufacturer details of Floodlighting Sheet 2 of 2; and
- Application Fee (to be paid via the Planning Portal).

Application Site

The application site is located on the Rectory Field Sports Ground, which is a large, interconnected playing field network that is the home to pitches and facilities serving 2

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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 facilities.

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 site is bound to the west by Donald Biggs Drive, to the east by existing vegetation and Church Walk, beyond which lies Gravesend Grammar School and to the north and south by existing playing pitches.

The site has no specific environmental designations in the Local Plan.

Relevant Playing History

There have been a number of planning applications relating to the Rectory Field Sports Ground over the years. However, the following applications are considered the most relevant to this application.

- Application Reference 19940742 – Application for the variation of condition (iii) of planning permission ref. GR93/31 to increase the maintained illuminance of the floodlights from 250 lux to 300 lux and variation of conditions (iv) and (v) to extend the hours of use of hockey pitch and hours of floodlighting from 9.00 p.m. to 9.30 p.m. weekdays. Permitted;
- Application Reference 20040658 – Erection of four low level floodlights for training area adjacent to Church Walk. Permitted;
- Application Reference 20040786 – Erection of eight 10m high floodlighting columns around three of the tennis courts. Permitted; and
- Application Reference 20131092 – Removal of four existing redundant lighting columns and installation of six new 15m high galvanised steel floodlighting columns. Permitted.

Proposed Scheme

The application proposes the installation of 4 no. new floodlights to a natural turf rugby pitch (106m x 53m including 2 x 6m in-goal areas), together with the relocation of 4 no. existing floodlights from an existing pitch.

The installation will consist of the excavation and pouring of 8 No. column foundation blocks, cable laying around the playing area and back to the existing three phase power supply position within the existing Cricket Pavilion.

The proposed floodlighting columns will each measure 10m in height, complete with climbing step loops.

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 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 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.

Planning Policy Compliance

Gravesham Local Plan Core Strategy

The following policies of the Core Strategy are considered relevant to the determination of this application:

- Policy CS01: Sustainable Development;
- Policy CS13: Green Space, Sport and Recreation; and
- Policy CS19: Development and Design Principles.

Other Material Considerations

- National Planning Policy Framework- The following sections of the NPPF are deemed to be of relevance to this application.
 - Section 2 – Achieving Sustainable development;
 - Section 4 – Decision-making; and
 - Section 12 – Achieving well-designed places.
- GBC Playing Pitch Strategy Final Assessment Report, June 2016; and
- GBC Playing Pitch Strategy and Action Plan, August 2016.

Planning Considerations

Principle of Development

Core Strategy Policy CS13 states that *'The Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space,*

playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base’.

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.

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.

Impact on character and appearance of the area

Core Strategy Policy CS19 states, amongst other things, that new development will integrate well with the surrounding local area.

The visual influence of the floodlighting must therefore be considered in the context of surrounding development. In this case, the floodlighting would be viewed in the context of existing floodlights within the sports ground complex.

With regard to the lighting columns themselves, the columns will have a galvanised finish, which are generally less visually intrusive and tend to be ‘lost’ against the sky and surrounding landscaping. The proposed scale, design, siting and materials of the floodlights are considered to be acceptable and in keeping with the use and appearance of the site and the surrounding area.

Considering the setting of the proposed and relocated lighting columns, they would not have an impact on the character or appearance of the area. The proposal therefore accords with Core Strategy Policy CS19.

Impact upon Residential Amenity

Core Strategy Policy CS19 states that new development will be located, designed and constructed to avoid adverse environmental impacts from pollution, including light pollution. It also states that new development will safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land.

Paragraph 130 of the NPPF also states developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. It is therefore important to consider the impact of the development on residential amenity.

In this case, 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.

In terms of light spillage, the enclosed plans demonstrate that the floodlights will provide sufficient coverage for suitable training conditions whilst avoiding significant spillage that would in any way impact upon local amenity.

The horizontal mounted floodlights reduces overspill and the visible area of the reflective surface, which results in a more efficient lighting system with less impact on the environment.

It is also important to bear in mind that the floodlights are adjacent to existing floodlights within the sports complex and will have the same hours of operation. The floodlights have control switches and time clocks to ensure that they do not remain on later than the permitted time.

Taking into account the nature and location of the proposal, it is considered that there would be no unacceptable adverse impact on the residential amenities of the occupiers of adjacent properties in accordance with the NPPF Section 12 and Core Strategy Policy CS19.

Access and Highways

The proposal would not result in any alteration to the existing access or off-road parking arrangement, and would not in any other way be prejudicial to highway safety.

The proposal is therefore considered to be acceptable in highway terms and would not have a detrimental impact on highway safety, in accordance with paragraph 111 of the NPPF.



Conclusion

Taking the above into account, it is considered that the proposal is appropriate for its context and is in accordance with the NPPF and Core Strategy Policies CS13 and CS19.

I trust you now have sufficient information to validate this application and I would be grateful if the application could be registered and validated as soon as possible.

I look forward to hearing from you. In the meantime, if you have any immediate queries, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, which appears to read 'Jackson'.

Laura Jackson

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