

Objection to Planning Application 261695 – Proposed Sports Pitches at Luckley House School

Submitted by: G Meades

I wish to object to the above planning application.

I live in Hart Dyke Close and have done for the past 30 years. I'd like to think I know the area very well.

It is not clear that the application demonstrates that the proposed development can be accommodated on this site without causing unacceptable harm to the character of the countryside and the amenity of neighbouring residents.

The application site forms part of land that has already been subject to extensive planning consideration through application 190286 and the subsequent Planning Inspector's appeal.

Those previous decisions provide important material considerations which, in my view, have not been adequately addressed within the current proposal.

1. Planning History and Previous Findings

The 261695 application site lies within the wider site that formed part of planning application 190286.

My understanding is that the 261695 application site (in part) formed part of a land swap agreed between the School and the developer, in exchange the School provided a strip of land that could be used to access the proposed housing from Luckley Road.

In refusing that application, Wokingham Borough Council concluded that development on this land would represent inappropriate encroachment into the countryside, harm the character of the landscape and reduce the important settlement gap between Wokingham and Finchampstead.

Following a detailed public inquiry and site inspection, the Planning Inspector reached similar conclusions regarding the importance of this land (APP/X0360/W/19/3235572 – Dismissed).

The Inspector concluded that the site forms part of the open countryside which contributes to the rural setting of Wokingham, and that development would urbanise this part of the countryside and cause harm to the character and appearance of the area.

Importantly, in addition, the Inspector also found that the residential properties in Hart Dyke Close are particularly sensitive receptors because of their direct relationship with the adjoining open land, concluding that they would experience **major adverse visual effects** from development immediately adjoining them (para 44 of APP/X0360/W/19/3235572).

These findings remain important material considerations when assessing the acceptability of any development on this part of the 190286 site.

2. Loss of Countryside Character and Settlement Separation

Although the proposal is described as sports pitches rather than residential development, it nevertheless represents a significant change in the character and function of this area of land situated outside the settlement boundary.

The land is currently open countryside forming part of the rural edge of Wokingham and contributing to the separation between Wokingham and Finchampstead.

The Council's previous assessment recognised the importance of maintaining this countryside setting and avoiding further erosion of the settlement gap.

The Council should not regard the proposal as merely retaining open land. Whilst the pitches themselves may remain mainly grassed, the proposal fundamentally changes the function of the land from undeveloped countryside to a managed recreational facility characterised by organised sporting activity, engineered infrastructure and associated operational activity. It is this change in character and use that should be assessed against the previous planning findings.

The School has also publicly indicated aspirations for additional sporting infrastructure on this site. Whilst such proposals do not form part of the current application, they reinforce the need for the Council to consider the cumulative urbanising effect of formalising this area of open countryside.

The Council should therefore carefully consider whether the proposal would undermine the landscape function of this open countryside.

3. Intensification of Use

The application states that the sports pitches will be available for community use outside normal school hours.

This materially changes the nature of the proposal.

Rather than functioning solely as school playing fields during the school day, the development has the potential to operate during evenings, weekends and school holidays.

The application should therefore clearly demonstrate:

- proposed hours of operation;
- anticipated frequency of community use;
- expected numbers of users;
- whether organised clubs or leagues are intended;
- likely spectator attendance;
- associated vehicle movements; and
- how neighbouring residential amenity will be protected throughout the year.

I have been unable to identify a comprehensive assessment of these operational characteristics within the submitted documentation.

4. Cumulative Impact

The proposal should be assessed as a whole rather than considering each individual element in isolation.

Collectively the proposal comprises:

- formal sports pitches;
- organised sporting activity;
- community use outside school hours;
- increased pedestrian and vehicle movements;
- engineered sports facilities;
- substantial acoustic mitigation;
- temporary floodlighting illustrated on the submitted plans (Arboricultural Impact Assessment- Appendix 1)
- associated maintenance and operational activity.

Taken together, these elements represent a significant change in the character, appearance and intensity of use of land that is presently open countryside.

The cumulative impact of these changes should be carefully assessed against the Planning Inspector's previous findings regarding the importance of maintaining the rural character of this part of Wokingham.

5. Residential Amenity

The Planning Inspector previously identified the properties in Hart Dyke Close as particularly sensitive receptors due to their immediate relationship with the adjoining land.

That finding remains highly relevant.

Paragraph 44 of the Inspector's decision recognised that the existing open character of the land makes an important contribution to the outlook experienced by residents of Hart Dyke Close. Although the current proposal does not introduce housing, it nevertheless replaces that open countryside with a managed recreational facility incorporating engineered structures, regular organised activity and associated infrastructure. This represents a significant change to the visual amenity of neighbouring residents and should be assessed in light of the Inspector's findings.

The site plan shows the inclusion of a 3.5m high acoustic barrier adjacent to the houses in Hart Dyke Close. That one item alone represents a very significant loss of visual amenity to those property owners. Not to mention the additionally intrusive rugby goal posts, 6m high catch nets and 4.5m high cricket sight screens (the ECB recommends the use of sight screens for outdoor hard-ball cricket. The submitted plans do not illustrate these. If sight screens are required to facilitate the intended use, they would introduce additional structures adjacent to neighbouring properties which have not been assessed as part of this application).

The proposed development introduces organised recreational competitive activity immediately adjacent to those residential properties. Despite the assurances it is likely that the residents of Hart Dyke Close will be subjected to increased noise levels in the form of coaching, whistles, shouting and swearing, spectators, maintenance equipment and activities, etc. Not to mention the possibility of ball strikes against property owners and their property.

Previously, the School has informed local residents that it intends to use the sports pitches for football as well as the sports listed in the application. The Council should therefore assess the likely noise associated with all intended sporting activities, rather than only those specifically illustrated on the submitted plans.

Given the proximity of neighbouring dwellings, I would hope that the Council should require robust evidence demonstrating that this application would not result in unacceptable harm to residential amenity.

6. Acoustic Barrier

The submitted plans include a 3.5 metre high acoustic barrier adjacent to neighbouring residential properties.

Its inclusion is significant because it demonstrates that the applicant has recognised the potential for operational noise to affect neighbouring homes.

The apparent need for substantial engineered mitigation immediately adjacent to residential houses and gardens raises an important planning question as to whether the proposed intensity of recreational use is appropriate in this location.

The Council should be satisfied, on the basis of robust evidence rather than proposed mitigation alone, that the proposed use is compatible with neighbouring residential properties and that an acceptable standard of visual and audible residential amenity can be maintained.

7. Floodlighting and Evening Use

The application also proposes community use outside school hours.

This creates uncertainty regarding the intended operation of the facility.

The Council should therefore clarify:

- whether evening use is intended;
- how evening activities would operate if lighting is not proposed; and

whether the potential effects of any lighting on neighbouring residents and the surrounding countryside have been properly assessed.

Although floodlighting does not appear to form part of the formal description of development, supporting plans (Arboricultural Impact Assessment- Appendix 1) appear to illustrate removeable floodlighting. However, there is no detail to:

- What removeable floodlighting means?
- What it would look like?
- How often (and why) would they be removed ?
- How often they will be used?;

Planning permission should not be granted where the operational characteristics of the proposal remain uncertain.

8. Flood Risk and Surface Water Drainage

The application has not, in my view, adequately demonstrated that the proposed development can be delivered without increasing flood risk on or beyond the site.

The applicant's Preliminary Flood Risk Assessment concludes that the proposal will have "**groundwater will have no negative impact on the proposed site.**" and "**will not impact on flood risk elsewhere**". However, these conclusions do not appear to be supported by sufficient site-specific evidence.

The northern part of the application site is known to experience prolonged seasonal flooding, with standing water regularly remaining on the site throughout the winter months and often well into spring.

The application provides little meaningful detail explaining how this water would be managed if the land is converted into formal sports pitches. In particular, there appears to be no detailed assessment of:

- how surface water currently accumulating on the site would be intercepted or drained;
- the capacity of any proposed drainage infrastructure;
- where collected water would ultimately discharge;
- whether downstream drainage infrastructure has sufficient capacity; or
- how flood risk elsewhere would be prevented from increasing.

The application refers to a rainwater harvesting tank for pitch irrigation but provides no calculations or technical evidence demonstrating that such a system could accommodate the volume of water known to accumulate on the site during prolonged wet periods.

Furthermore, information previously submitted in support of planning application 190286 described poor infiltration characteristics on the site and indicated that a piped drainage system with attenuation would likely be required. This appears inconsistent with the current application's suggestion that the proposal would have no adverse impact on flood risk without providing equivalent supporting analysis.

9. Ecology and Trees

The Preliminary Ecological Appraisal repeatedly concludes that ecological effects will be negligible because the proposals will retain the site's trees and native hedgerows. However, the Arboricultural Impact Assessment identifies the removal of Tree T54 and part of Hedgerow Group G55. It is therefore unclear whether the ecological impact assessment has been undertaken on the same scheme as that assessed by the arboricultural consultant.

The previous application 190286 in 2019 was accompanied by an extensive Ecological Appraisal. I see no reason why the wildlife should have changed significantly since that appraisal. This is important as the appraisal recorded many protected species within or very close to the proposed sports pitches site specifically, including (but not limited to) bats, grass snakes, slow worms, breeding skylarks, breeding dunnocks, willow warbler, kites and barn owls.

I would ask that the Council satisfies itself that all supporting environmental assessments are accurate before determining the application.

10. Safety (sport participants and residents)

Whilst the proposal would appear to have the support (albeit conditional) of Sport England. Contained within their response is the following comment from the ECB (England Cricket Board) who presumably Sports England consulted with:

“However, based on the proposed pitch layouts as set out in drawing 7004:25:3, the orientation of the new cricket Non-Turf Match pitch needs revisiting. This should be north to south facing so as play is not affected by the setting sun.”

*“Therefore, before the ECB can fully support, **a revised pitch layout is required** taking the above into consideration.”*

Sports England then concede the layout falls short of their guidance.

In 2023 the ECB revised it's guidance (because of incidents of injury) regarding the safety margin from a cricket pitch's boundary to the nearest solid object, from 1m to at least 2.74m. It is not clear from the plans whether this has been incorporated but it looks certain that there is insufficient room to safely position cricket sight screens (another ECB recommendation) in the room available.

It is also worth considering whether it is acceptable for the outfield of a cricket pitch to also be used for rugby/football? Both rugby and football players use heavily studded boots and can cause the ground surface to become rough and uneven with use. My understanding is that (for the safety of the fielders) cricket pitches are ideally smooth and even all the way to the boundary.

The same consideration might be given to the shared use of a rugby pitch and a running track?

Sports England recommends a minimum of 5m run off surrounding a rugby pitch and at least 3m between the outside of the run offs between adjacent pitches. If these distances are reduced then this should be justified following a risk assessment.

Because of the scale of the drawing 7004:25:3 it is very hard to ascertain whether Sports England were fully aware of the hazards (hard immovable objects) such as acoustic barrier, perimeter fencing, catch net posts, TPO (and non TPO trees), the Non Turf wicket and maybe removeable floodlighting, that are all VERY close to the run off margins surrounding the playing areas.

By their very nature, Rugby/football and cricket are unpredictable sports. It is very unlikely that 'high' balls will only be confined to the area protected by catch fencing, raising the possibility of balls strikes to the occupants and buildings of the adjacent properties in Hart Dyke Close.

I understand the School intend to hire these pitches out for use by the local community however is the question needs to be asked how attractive the facilities will be to other

groups (especially adult groups) when it would appear that some of the pitches and safety margins have been sized for school use.

The question needs to be asked about the choice of location/size of the applicant's sports pitch site, as it would appear:

- to only just meet (and in areas fall short of) the minimum guidance standards of Sports England;
- to fail to satisfy the ECB guidance;
- potentially, to present a hazard to the neighbouring properties and their occupants.

11. Need for a Comprehensive Assessment

The Council and an independent Planning Inspector have already concluded that this land performs an important landscape function and that Hart Dyke Close is an especially sensitive residential receptor. Application 261695 proposes changing the character and use of that same land.

The 261695 application introduces a substantially different operational use which has the potential to affect both landscape character and residential amenity.

I therefore consider that the application should be supported by robust evidence addressing:

- landscape character;
- countryside impact;
- settlement separation;
- safety;
- operational noise and it's nature and content;
- flooding;
- hours of operation and lighting;
- community use and traffic associated with community use;
- Ecology and trees
- the cumulative effects of these matters on neighbouring residents and the wider area.

Without such evidence, I do not believe the Council can properly conclude that the proposal complies with development plan policies requiring development to protect the character of the countryside and the amenities of existing residents and therefore should be rejected.