

FORMAL PLANNING OBJECTION

Planning Application Reference: 261695

Site Location: Luckley House School, Luckley Road, Wokingham, RG40 3RS

Proposal: Expansion of school curtilage into the countryside and creation of new pitches together with associated infrastructure.

Objector : HDC Advocates for Countryside and Environment (ACE).

Reason for Objection: Severe Adverse Impact on Residential Amenity via Noise Pollution, Overbearing Development, and Unmitigated Impulsive Impact Noise.

This is submitted by the residents' group in response to the Noise Impact Survey for the proposed sports pitches development in the countryside by Luckley House School. The layout, scale, and intensity of the proposed sports pitches have the potential to cause unacceptable, permanent harm to the living conditions and residential amenity of neighbouring properties, particularly those on Hart Dyke Close.

Our concerns arise from the inappropriate **location, intensity and proposed operational scope of the development**, together with significant limitations, omissions and assumptions within the submitted Noise Impact Assessment ("NIA").

The NIA predicts rugby noise of up to **50 dB LAeq,1hour and 68 dB LAFmax at houses on Hart Dyke Close**, with the latter being approximately 10 dB above the existing daytime modal maximum of 58 dB.

We consider that the NIA does not adequately demonstrate that the full range of activities which the school intends to undertake has been assessed, nor that the resulting impacts can be satisfactorily mitigated.

We urge the WBC to refuse this application based on the following material planning considerations:

1. The proposed layout places intensive sporting activity immediately adjacent to residential properties

The proposed pitch layout places the rugby try lines and in-goal areas of both pitches immediately adjacent to the residential boundaries of Hart Dyke Close. For the most affected receptor, this means the acoustic fence being 5-7m approximately from their main living areas and bedrooms (as far as can be ascertained from the plan).

The proximity of the proposed activity is particularly concerning because sports pitches are not uniform noise sources. Noise will vary according to the location of players, coaches, officials and spectators and according to the activity taking place.

The NIA itself recognises that referee whistle levels can be very high, selecting **110 dB(A) at 1 metre** as its assumed source level, while also acknowledging that the received level depends on the referee's location and orientation.

The issue is therefore not merely the calculated average noise level across a pitch. It is whether the assessment adequately captures the **worst reasonably foreseeable location and character of intermittent noise events in a pitch positioned immediately beside residential properties.**

We consider that the layout itself creates an avoidable conflict between intensive sporting activity and established residential amenity.

This is particularly relevant to Wokingham's emerging Policy HC8, which establishes a hierarchy for dealing with adverse noise impacts, beginning with review of the **development layout** before relying upon physical mitigation.

Vocal Bursts & Character: Shouting, cheering, and match tension occur right at the try line. Because this noise is intermittent and contains highly intelligible human speech, it carries an acoustic "character penalty" because human brains naturally tune into nearby shouting, making it far more disruptive than steady traffic noise.

2. Failure to Model Cumulative and Simultaneous Noise from Multiple Pitches

The planning application proposes **two rugby pitches**, but the NIA's assessment is based on individual sporting activities and states that the facilities are assumed to be used for one activity at a time. The report therefore does not appear to demonstrate the noise effects if both pitches are used at the same time. This is only an assumption and begs the question of if this were true then why have 2 pitches. The NIA should not rely on an operational assumption which is not reflected in a restriction of use.

This is particularly important because the NPPF requires consideration of the likely effects, including **cumulative effects**, of pollution on health and living conditions.

3. No assessment of football being played, despite the school informing residents that it would be.

This is a particularly important omission.

Before the current planning application was submitted, the applicant wrote to neighbouring residents informing them of the intention stating that;

*"The field would be primarily used during the school day for curriculum PE lessons and school fixtures, notably for rugby **and football** during the Autumn and Winter terms and athletics and cricket during the Summer term".*

This has since been reaffirmed by the Bursar to our group in a meeting held during the consultation period.

However, the submitted NIA does not mention football or provide a specific assessment of football use.

The acoustic characteristics and patterns of use of football cannot simply be assumed to be identical to rugby.

Football can involve different patterns of player and coach communication, referee whistle use, training and match activity, frequency and duration of use, spectator attendance and community/club use.

The submitted NIA bases its entire sports pitch assessment on rugby speech levels and cricket net impacts. However, if this layout is granted permission, there is no automatic mechanism to stop the school from utilising this multi-use area for competitive football. A football configuration would inevitably place a goal directly adjacent to the Hart Dyke Close residential boundaries.

Football introduces an entirely different, highly disruptive acoustic profile. Unlike rugby, which features intermittent set-pieces, football is fluid and generates continuous shouting. More critically, shots at the goal will result in footballs repeatedly striking the perimeter fencing or goal posts at high velocity. The current NIA has entirely failed to model the impulsive noise of ball strikes right outside our properties.

4. The Proposal Fails the Applicant's Own Sport England Criteria

Section 3.1 of the applicant's NIA explicitly states that under Sport England guidelines: *"Noise from the new facility should ideally not exceed the existing noise climate (measured in the LAeq parameter)"*.

The data submitted by the applicant proves they fail their own test:

- Table 4.2 of the NIA establishes the existing operational ambient noise climate as **48 dB (LAeq)**.
- Table 7.1 of the NIA reveals that even *with* a massive mitigation screen in place, the predicted noise level from the rugby pitches at Hart Dyke Close will rise to **50 dB (LAeq,1hour)**. But this noise is not a steady continuous noise, so will rise above 50dB.

5. The NIA predicts a significant increase in maximum noise events

The NIA attempts to downplay maximum noise spikes, yet the technical data reveals a devastating impact on our properties. Table 4.2 lists the existing daytime peak noise events (LAmax) at the site as **58 dB**. Table 7.1 shows that rugby play will introduce regular maximum peaks of **68 dB (LAmax)** at Hart Dyke Close.

Crucially, the applicant's own report defines the effect of this increase in **Appendix A, Section 1.3**, stating: *"A change in sound level of 10dB is perceived by the average listener as a **doubling**... of loudness"*.

By the consultant's own admission, sudden shouts and whistle blasts from the pitch will sound **twice as loud** as any peak noise currently experienced by residents. These intermittent, high-energy acoustic spikes pierce standard residential glazing, making it impossible to enjoy our gardens, relax, or work from home.

We therefore consider the predicted **68 dB LAF_{max}** to be an important aspect of the impact. The issue is particularly important because intermittent high-level events can materially affect the character and perceived amenity of a residential environment even where they do not dominate a long-term average.

Furthermore, given the proximity of the most affected receptors' living areas to the boundary, there has been no assessment on how the internal limit of 35 Db (HC8 of the Local Plan Update) would be impacted when windows and bi-fold doors are open, which has been essential at all times this spring/summer.

6. The NIA's treatment of rugby voices requires further justification

The NIA models the dominant rugby noise using a "**Raised Voice**" source level of 67 dB LAeq at 1 metre. It assumes that players call to each other using "raised voices" (is calling not the equivalent of shouting?) The report then says that the data in table 5.2 has been corrected to meet Sport England AGP (Artificial Grass Pitch) guidance for typical sports at the halfway line, even though they state that it is not directly applicable to rugby or cricket. So, it isn't clear which numbers have actually been used in the model. New guidance makes the important point that the Sport England's figure of 58 dB is a **typical** AGP emission level, not a definitive level for every sport or activity. It specifically says the data has limitations and that additional site-specific data may be needed.

The NIA separately identifies a "**Shouted Voice**" of **82 dB LAF_{max}** as an additional noise source. It also identifies the referee whistle at 110 dB LAF_{max}.

The report does not specify **how any shouted-voices or whistles have been incorporated into the time-averaged prediction**, what sorts of activity were modelled, i.e. Training, practice matches, competitive matches, competitions with supporters etc.

The analysis does not specify how often matches will take place, how long competitions might last, or if athletics or cricket will be played all day, half a day, every day.

The NIA conclusion says that due to the limited usage of the pitches, the impact at the most affected noise sensitive receivers is expected to be low, but they show no evidence of this limited usage or that it wouldn't change over time. In fact, the application stresses the potential hiring out of the facilities, but with no details or noise assessment for this.

The NIA should demonstrate that the source assumptions represent the **reasonably foreseeable use of this particular facility**, rather than merely providing plausible individual source levels.

7. The 50 dB prediction reaches the upper end of the cited Sport England criterion

The NIA relies upon Sport England's guidance concerning acoustic impacts from artificial grass pitches and identifies a criterion of **50 dB LAeq,1hour** outside residential properties and in gardens. It also notes the guidance that noise from a new facility should ideally not exceed the existing noise climate.

The NIA records the existing Luckley House School operational LAeq as **48 dB**, while predicting up to **50 dB LAeq,1hour** from the rugby pitches at Hart Dyke Close.

We therefore consider it important that the applicant explains why a predicted level which **exceeds the existing operational noise climate** and reaches the upper end of the cited Sport England criterion is considered acceptable.

8. The assessment of cricket is based on cricket-net activity rather than an actual cricket match

The NIA derives its cricket source data from measurements undertaken at another site while junior and senior players were using cricket nets.

The report then considers that data representative of the proposed cricket square.

That may provide useful source information, but it does not demonstrate that the acoustic character of a **full cricket match on the proposed site** is equivalent.

The assessment should therefore explain the basis for assuming that cricket-net activity adequately represents:

- communication between players across a full field;
- appeals and calls during competitive play;
- coaches;
- spectators;
- match conditions; and
- the frequency and duration of those events.

9. Noise from the athletics track has expressly not been assessed

This is a major omission in the NIA.

The report states:

"Noise from the athletics track is not expected to be significant ... and has not been specifically considered."

The application nevertheless includes an athletics track.

The applicant has therefore made an assumption about the insignificance of this use without undertaking a specific acoustic assessment.

The applicant does not provide any evidence to support the conclusion that athletics noise will not be significant, including the potential for organised sports days and other events involving multiple participants and spectators. The sprinting part of the track has been planned up against the neighbouring properties, and would have the potential of loud spectators/team mates cheering and shouting, plus starter guns etc, especially on sports days or competitions.

As residents, we know from experience that this can be very loud at Luckley, particularly on sports days where there is a lot of screaming, shouting and cheering going on together with loud PA systems. In fact, at a recent sports event, the school used a part of the field, so we already have experienced the very high levels of noise to be expected from a track.

10. The proposed out-of-hours/community use has not been adequately assessed

Section 2 of the report explicitly states that the pitches will allow for "*limited club or public use outside of school hours*". Despite this, the NIA contains absolutely no acoustic modelling for evening or weekend scenarios.

The school's own pre-application correspondence similarly referred to the possibility of wider community partnerships outside school hours.

There is therefore a material difference between the **potential operation of the development** and the scenario actually modelled.

During evenings and weekends, local traffic noise drops, and the background noise climate is considerably quieter than the weekday. Introducing high-intensity adult club usage during these sensitive times will result in a much higher subjective annoyance level. What would the hours of use be? What about frequency of use? What about spectator assumptions? Traffic assumptions? The NIA is structurally deficient under the National Planning Policy Framework (NPPF) for failing to assess the impact during these vulnerable rest hours.

This is directly relevant to NPPF paragraph 198, which requires consideration of the likely and cumulative effects of pollution on health and living conditions.

11. The baseline survey requires further justification

The NIA states that a noise survey was carried out last November at a spot chosen to be representative of the noise levels at the surrounding residential elements. This is clearly not the case. As can be seen from the site plan VA6149/SP1 in the NIA, the noise monitoring location was placed close to the school's current playing field boundary. Yet the most affected receiver is almost at the opposite end of the field (about 90-100m away), from the school. Not measuring here would appear to be a gross omission as it is plain to see that existing background noise at this location would be much lower than where it was actually measured. Here, it is extremely quiet, and as noted in the noise report from the previous planning application on this land, the dominant sound is birds.

We therefore ask whether the monitoring location is genuinely representative of the acoustic environment experienced by most residents.

We have also noticed that the school has removed/cleared the bushes/hedges from between the trees on the boundary of the school and the proposed site already, thus removing some of the noise protection. We would like to know if this was done before the background noise assessment was carried out. In addition, we would like to seek assurance that the background measurement was not carried out at a time when temporary building works were being carried out as some residents had been extending/remodelling their homes.

12. The 3.5 metre acoustic barrier demonstrates the severity of the layout problem

The NIA recommends a 3.5 metre-high, continuous and imperforate acoustic screen, between the pitches and the residential properties.

The NIA subsequently states that its conclusions rely upon this mitigation measure being implemented.

We do not consider the screen simply to be a neutral mitigation measure.

Its necessity demonstrates the extent to which the proposed layout brings intensive sporting activity into conflict with the neighbouring residential properties.

This is particularly relevant to emerging Policy HC8, which adopts a hierarchy for adverse noise impacts beginning with consideration of the **development layout**, before reliance upon physical mitigation.

The question should therefore not simply be whether a 3.5 metre barrier can technically reduce noise.

It should also be:

Why has the development been laid out in a manner which requires such substantial physical mitigation immediately adjacent to existing homes?

13. Severe Loss of Visual Amenity from the Proposed 3.5m Acoustic Screen

To barely achieve their questionable noise targets, Section 6 of the report mandates the installation of a massive 3.5-metre-high continuous, solid, acoustic screen right along our residential boundary for what looks like 140m.

While acoustically necessary due to the poor layout and unsuitability of the site, a solid 3.5m fence erected immediately next to the homes on Hart Dyke Close represents an incredibly oppressive and overbearing form of development. It will result in a severe loss of outlook, daylight, and significant overshadowing of our private gardens and rooms.

The ball netting fences, rising above the 3.5m solid acoustic fencing would be as high as a 2-storey building, creating a claustrophobic, prison like appearance.

As well as these fences and netting there would be rugby posts towering above them, in front of our windows/gardens. There is no indication given of the height of these, but they can be 10-17m high. This fencing and rugby posts would even be clearly visible from the road, rising above garages and obscuring the views of the countryside. The requirement for such an extreme, industrial-scale barrier is clear evidence that this field is entirely the wrong location for high-intensity rugby pitches.

14. The proposed Noise Management Plan is not an adequate substitute for proper assessment and design

The NIA includes a section titled Noise Management Plan. However, this cannot be considered to be a plan. It contains a few thoughts that **could** be refined and adopted. It is mainly based on reminding staff, students and spectators of the close proximity of residents, and being nice and quiet. We all realise that this is totally unrealistic – this is a school and pupils can't help making noise. These measures may be useful in dealing with unreasonable behaviour.

However, the principal sources identified in the NIA include player voices, coaches, spectators and referee whistles.

These are not necessarily forms of unreasonable behaviour. They are inherent characteristics of normal sporting activity.

A management plan therefore cannot reasonably be relied upon as the principal means of controlling noise which arises from ordinary competitive sport.

How many staff would be on duty at the pitch to enforce the noise levels? With a massive fence in place, it would also be easy for players and spectators to forget that there are houses so close.

15. Previous planning history demonstrates that noise and operational controls at Luckley House are material considerations

There is relevant planning history at the School.

Application **190673**, determined in 2019, concerned a multi-use synthetic sports pitch with substantial fencing and floodlighting.

During consideration of that application, neighbouring residents raised concerns about the adequacy of the noise assessment, including **spectators, traffic noise, PA systems, referee whistles and background noise.**

The Planning Committee subsequently imposed restrictions on hours of use.

The clear difference here is that this previous development was within the school's current grounds, within settlement area, and 60m from the nearest neighbouring property (52m from the boundary). The school grounds are furthermore enclosed with woods on one side and mature trees (oaks) round the other boundaries. Yet still there are registered complaints of breaches to the council/school from residents in Denby Close and Hart Dyke Close.

16. Planning policy context

The current NPPF is clear that development must be appropriate to its location, taking account of the likely effects, including cumulative effects, of pollution on health, living conditions and the natural environment. Paragraph 198 specifically requires potential adverse noise impacts from new development to be mitigated and reduced to a minimum and significant adverse impacts on health and quality of life to be avoided.

Wokingham's emerging Local Plan Update Policy HC8 is directly relevant to this application. It requires development proposals to demonstrate how noise impacts have been addressed to protect sensitive receptors, including existing dwellings, and provides a hierarchy for dealing with adverse effects, beginning with review of the development layout.

Conclusion and Requested Action

This application places a substantial amount of potentially high-intensity sporting activity immediately beside existing homes while the submitted NIA relies upon a number of assumptions which have not been adequately demonstrated.

In particular:

1. The NIA predicts **50 dB LAeq,1hour at Hart Dyke Close**, exactly at Sports England's maximum level, but 2dB above current background levels (Sport England state it should not be higher).
2. The predicted maximum at Hart Dyke Close (**68 dB LAFmax**) is approximately **10 dB above the existing daytime modal maximum** (perceived as a doubling in loudness).

3. The assessment does not model the use of both pitch areas simultaneously, and there is nothing to say that this will not happen.
4. The applicant has previously identified **football** as an intended use, but the NIA contains no specific football assessment.
5. The NIA expressly states that athletics noise has **not been considered**.
6. Cricket predictions rely upon measurements from **cricket nets at another site**.
7. The applicant and NIA both contemplate potential **out-of-hours/community use**, but the acoustic assessment assumes daytime use and includes no assessment outside school hours.
8. The baseline monitoring station was situated next to the school, far from the most effected user.
9. The NIA relies upon a substantial **3.5 metre solid acoustic screen** to achieve its predicted results, thus causing loss of amenity for neighbouring residents, complete change of character of the area, and visual impact and loss of character of countryside.
10. The NIA's conclusions expressly depend upon the facilities being constructed as specified and on reasonable and responsible use.
11. Previous planning history at Luckley House demonstrates that noise, hours of operation and detailed sports-facility use have previously required careful consideration and enforceable controls.

Taken together, these matters mean that we do **not** consider the submitted NIA provides a case for protecting the residential amenity of neighbouring residents.

The proposal actively violates **NPPF Paragraph 198**, which requires consideration of the likely and cumulative effects of pollution on health and living conditions.

Requested action

We strongly urge Wokingham Borough Council to **refuse planning permission** for this application.