

100
YEARS



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Berkshire

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14 August 2026

The Planning Team
Wokingham Borough Council
By email to development.control@wokingham.gov.uk

**Ref: Planning Application 261695 - Luckley House School, Luckley Rd, Wokingham RG40 3EU:
Proposed Sports Pitches & Associated External Works at Luckley House School**

Dear Sir or Madam,

OBJECTION TO PLANNING APPLICATION 261695

I write on behalf of the Berkshire Branch of the Campaign to Protect Rural England (CPRE).

We hereby submit this objection to planning application 261695 for the expansion of school curtilage into adjacent land and the creation of new sports pitches with associated external works at Luckley House School, Luckley Road, Wokingham.

This objection is submitted on the grounds that the proposed development is fundamentally unsuitable for its proposed location due to inadequate separation from residential properties.

In our submission, the applicant has positioned the development purely according to land ownership constraints rather than planning suitability.

This results in unacceptable impacts on residential amenity, particularly relating to noise generation and artificial lighting, contrary to adopted planning policies requiring development to protect existing residential amenity.

1. FUNDAMENTAL UNSUITABILITY OF PROPOSED LOCATION

1.1 Location Determined by Land Ownership, Not Planning Suitability

The Planning & Design Statement reveals that the proposed sports pitches are located on "an open grass area located directly to the south of the existing all-weather pitch and grass sports pitch." Critically, the statement also notes that:

- The southern and eastern boundaries of the proposed pitches abut "open fields, consisting of dormant grassland"
- These fields are not part of the school's owned property and control
- The western boundary directly adjoins residential properties at Hart Dyke Close

This demonstrates that the applicant has proposed the sports pitches in the location where they already own land, rather than identifying the location most suitable for protecting residential amenity.

1.2 Planning Principle: Site Suitability is Fundamental

A fundamental principle of planning law and practice is that a development must be suitable for its proposed location. National planning guidance emphasizes that applications should be assessed against whether the location is appropriate for the type of development proposed.

Intensive sports use involving multiple simultaneous activities (rugby, cricket, athletics), with inherent noise generation and future potential for floodlighting, is fundamentally unsuitable for a location directly adjacent to residential properties in a quiet residential area.

The applicant cannot remedy the unsuitability of this location through mitigation measures (acoustic fencing). Mitigation is intended to manage unavoidable impacts of otherwise suitable development. Here, the location itself is unsuitable.

1.3 Mitigation Cannot Overcome Location Unsuitability

The applicant's reliance on acoustic fencing as mitigation should be viewed in this context. They have not chosen this location for its suitability but for convenience of land ownership. They now propose mitigation to address the resulting problems—rather than relocating the development to a suitable location.

If the location itself were suitable for sports facilities, there would be no need for acoustic screening of a western boundary. The requirement for such screening underscores the fundamental unsuitability of this location adjacent to residents.

1.4 Policy HC4 Does Not Override Amenity Protection Policies

The Planning & Design Statement relies on Policy HC4 (Open space, sports, recreation and play facilities) to argue that the proposals should be supported. Policy HC4 does indeed encourage new sports facilities, and it recognises schools as appropriate locations for such facilities.

However, Policy HC4's support is explicitly conditional. The policy states that development proposals for sports and recreation facilities will be "encouraged and supported, in line with other policies in the Local Plan Update."

The phrase "in line with other policies" is crucial. It means:

- HC4 support is not absolute or unconditional
- All other relevant policies must also be satisfied
- Policies protecting existing residential amenity (DH2, HC8) remain in force

At this location, the proposal cannot simultaneously satisfy both HC4 (which encourages sports facilities at schools) AND Policies DH2 and HC8 (which require no unacceptable impact on existing residents' amenity and no noise disturbance). This is a direct conflict.

When policies conflict, the framework is that amenity protection to existing residents takes precedence over encouragement of new facilities. Existing residents have established rights to enjoy their properties without unacceptable disturbance. New facilities cannot be imposed upon them in breach of those rights.

Furthermore, HC4 requires that new sports facilities "should be well related to the communities they serve." This proposal is not well-related to the neighbouring residential community—it will harm them through noise and potential lighting impacts. It is only "well-related" to the school community it serves. Good planning requires benefits and burdens to be appropriately distributed. A facility that benefits students but harms neighbouring residents is not "well-related" to its wider community context.

2. NOISE IMPACT AND RESIDENT AMENITY

2.1 Location and Proximity to Residential Properties

The proposed sports pitches are located immediately adjacent to residential properties at Hart Dyke Close (properties 7-16), particularly those backing onto the development site. These dwellings are detached residential properties where occupiers have a legitimate expectation of enjoying quiet domestic use of their gardens and outdoor spaces.

The close proximity of the proposed development—with the western boundary directly abutting private residential curtilages—means noise from sports activities will directly and unavoidably impact neighbouring residents. This proximity was chosen by the applicant based on land ownership, not on suitability for the proposed use.

2.2 Nature and Extent of Noise Generation

The proposed development includes:

- Cricket pitch with artificial wicket and associated activities
- Two rugby pitches for competitive and training use
- 300m athletics track
- Rugby goal posts and ball-stop netting

Sports activities at such facilities are inherently and unavoidably noisy, involving:

- Shouting and verbal communication from players and coaches
- Impact noise from balls, rackets, and posts
- Noise from whistles and alarms
- Mechanical noise from pitch maintenance equipment and vehicles

These noises are a fundamental and unavoidable characteristic of the proposed use. No amount of acoustic screening can entirely eliminate such noise at a location this close to residential properties.

2.3 Inadequacy of Acoustic Mitigation

The Planning & Design Statement proposes an acoustic screen fence (3.5m high) positioned inboard from the western boundary. However, this mitigation measure is inadequate for several reasons:

Positioning and Effectiveness: The acoustic fence is positioned inboard (away from the boundary). This positioning reduces its effectiveness as it does not directly screen the noise source. Sound will still propagate around and over the fence to reach neighbouring properties.

Distance from Residential Properties: The statement notes the fence is "kept away from the boundary with the adjoining houses" to ensure no intrusive effect on their "outlook". This design decision prioritises visual impact over noise protection, leaving residents exposed to noise disturbance. This compromise is only necessary because the site location is unsuitable.

Noise Assessment Limitations: The accompanying Noise Impact Assessment (by Venta Acoustics) recommends the acoustic fence but does not provide quantified noise level predictions for neighbouring gardens. Without baseline noise measurements and predicted noise levels both with and without mitigation, it is impossible to assess whether the proposed measures will achieve suitable quiet conditions as claimed.

Extended Operating Hours: The statement refers to "daytime only within their normal school hours and reasonable after-school club times" and potential community use outside school hours. The undefined term "reasonable after-school club times" and community use extend operating hours significantly beyond standard school hours, increasing noise exposure for residents during evenings and weekends.

2.4 Policy Compliance

The Wokingham Borough Council Local Plan requires that development has no unacceptable impact on the amenity of existing occupiers (Policy DH2) and must have no adverse effect by virtue of noise disturbance (Policy HC8).

The proximity of intensive sports use to residential properties, combined with inadequate noise mitigation, raises serious concerns regarding compliance with these policies. More fundamentally, a location unsuitable for this type of use cannot be rendered suitable by mitigation measures.

3. ARTIFICIAL LIGHTING AND FUTURE EXPANSION CONCERNS

3.1 Absence of Commitment Against Future Lighting

While the current proposal states that "floodlighting to the pitches does not form part of the proposals", this statement represents merely the current proposal, not a binding commitment. Once permission is granted, the physical infrastructure (pitch bases, structures) would be in place, potentially facilitating future applications for floodlighting without requiring material change to existing permissions.

3.2 Likely Requirement for Floodlighting

School sports facilities commonly extend their operational hours through artificial lighting to maximise usage. The statement's own text indicates provision for "community benefit through organised partnerships...outside school hours", which would practically necessitate lighting during winter months and evening use.

The inclusion of a 300m athletics track—a facility rarely utilised without floodlighting—suggests operational intentions beyond daylight hours.

3.3 Impact of Artificial Lighting on Residential Amenity

Should floodlighting be introduced subsequently, neighbouring residents would experience:

- Intrusion of artificial light into gardens and windows during evening hours
- Disruption to sleep patterns from light spill
- Loss of natural darkness and negative environmental impacts
- Reduction in property values and residential amenity value

3.4 Precautionary Principle

Given the lack of certainty regarding future floodlighting, and the significant amenity impacts such lighting would create, the precautionary principle would suggest refusing permission for the sports pitches infrastructure until and unless floodlighting is definitively ruled out through planning condition or legal obligation.

4. CUMULATIVE AND LONG-TERM IMPACT ON RESIDENTIAL AMENITY

Residents in Hart Dyke Close have chosen to reside in a predominantly quiet, residential area. The introduction of intensive sports use, with associated noise from multiple simultaneous activities, represents a significant and permanent change to the character and amenity of this residential locality.

The cumulative impacts of noise and potential future lighting intrusion, operating throughout the year and potentially during extended hours, would materially and detrimentally affect residents' ability to enjoy their properties in accordance with their legitimate expectations of residential use.

These harms are not mitigable because the fundamental problem is the unsuitability of the location, which the applicant has chosen based purely on land ownership convenience rather than planning merit.

5. WHAT THE APPLICANT SHOULD DO

If Luckley House School wishes to expand its sports facilities, the appropriate course of action would be to:

1. Reduce the scale and intensity of the proposed facilities to a level compatible with proximity to residential uses; OR
2. Acquire additional land south/east of the existing school boundary to create adequate separation from residential properties.

The applicant should not expect to overcome location unsuitability through mitigation measures applied to a fundamentally unsuitable site.

6. CONCLUSION

For the reasons set out above, this proposal fails on the fundamental ground of site unsuitability. The applicant has proposed intensive sports facilities at a location immediately adjacent to residential properties, chosen purely for convenience of land ownership rather than planning merit.

The proposal also fails to satisfy planning policies DH2 and HC8 of the Wokingham Borough Council Local Plan, which require that development must not have an unacceptable impact on the amenity of existing occupiers and must not have adverse effects by virtue of noise disturbance.

While Policy HC4 encourages sports facilities at schools, this support is explicitly "in line with other policies." Policies DH2 and HC8 (amenity protection) must also be satisfied. At this location, both requirements cannot be met. Amenity protection to existing residents takes precedence over encouragement of new facilities. Additionally, the proposal is not "well-related to the communities it serves" as required by HC4, because it will harm the neighbouring residential community.

The inadequate mitigation of noise impact, combined with the unresolved risk of future artificial lighting, means the development would create unacceptable impacts on neighbouring residential amenity.

We respectfully urge the planning authority to refuse planning application 261695 on the grounds of:

1. Fundamental unsuitability of the location for the proposed intensive sports use adjacent to residential properties;
2. Failure to satisfy Policy HC4's requirement that facilities be "well-related to the communities they serve" when they will harm neighbouring residents;
3. Unacceptable noise impact on existing neighbouring residents in breach of Policies DH2 and HC8; and
4. Unresolved risk of future artificial lighting creating additional amenity impacts.

Yours faithfully,

Patrick Griffin

Patrick Griffin – Trustee, CPRE Berkshire
