



Committee Report

Planning Committee North – 11 January 2022

Application no DC/21/0007/FUL

Location

North Suffolk Skills Academy
Harrisons Lane
Halesworth
Suffolk
IP19 8PY

Expiry date 13 April 2021

Application type Full Application

Applicant CBW Design Ltd

Parish Halesworth

Proposal Change of use to sports facilities comprising new grass football pitch adjacent to Harrisons Lane and construction of a new artificial football pitch with associated parking, access, lighting, acoustic fencing and drainage adjacent to the Apollo Youth Centre and adjacent field to the south.

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1. Summary

- 1.1. The application seeks consent for outdoor sports facilities on the former Halesworth Middle School site and agricultural land to the south. It comprises a new grass playing pitch and a new artificial 3G pitch with associated parking, access, lighting, pedestrian/cycle routes and drainage, on 4.59 hectares of land to the south of Harrisons Lane, Halesworth.
- 1.2. The site forms part of the allocation in the East Suffolk Council Waveney Local Plan 2019, for the Halesworth/Holton Healthy Neighbourhood (Policy WLP4.1), a comprehensive redevelopment to provide housing, health care facilities, retirement community and indoor and outdoor sports facilities on the former Middle School site and adjacent land. This

application must be read alongside DC/21/0027/FUL also presented to this Planning Committee meeting for consideration. The two applications are mutually dependent on each other.

- 1.3. The application does not include details of any indoor sports facilities which will need to be dealt with as a separate planning application when plans for that aspect of the applicant's vision for the site are completed. It also does not cover consent for the demolition of the Apollo Youth Centre or its replacement. The replacement of that facility is an expectation of the allocation policy, but it needs to be planned and the implementation and use of the current proposal do not prejudice the continued use of that facility.

The Case for Development

- 1.4. The site forms part of the Halesworth/Holton Healthy Neighbourhood under Policy WLP4.1 of the East Suffolk Council Waveney Local Plan (March 2019) which allocates 22.05ha of land comprising the former Halesworth Middle School site, North Suffolk Skills Centre and land to the south, for a comprehensive mixed use development comprising:
 - Residential development (approximately 215 dwellings);
 - Health Care Facility and Retirement Community;
 - Sports Facilities including, playing pitch, 3G pitch, and indoor sport facilities and
 - Education/Training Facility.
- 1.5. This application seeks consent for the playing pitch and 3G pitch element of the Halesworth/Holton Healthy Neighbourhood. The principle of sports pitch provision on the site is therefore established and the application will help deliver the vision of the Halesworth Campus and Halesworth Health to provide additional sporting and health facilities in the town. The plans of these organisations will help promote healthier lifestyles for new residents and existing residents alike. In terms of wider use and needs it should be acknowledged that these will also serve over 600 homes under construction and coming forward for development over the next 5+ years, as set out in the Local Plan.
- 1.6. Officers have worked closely with the applicant to ensure the proposal will provide good pedestrian/cycle connectivity to adjacent sites to ensure the sports facilities will be accessible to both existing and future residents. Overall, the land areas, nature and quantum of development accords with Policy WLP4.1 and its indicative masterplan. A previous outline planning permission for 190 homes (DC/18/4947/OUT) east of this site off Harrison's Lane was consented in 2019 and also forms a fundamental part of the allocation, specifically through the provision of land for the 3G pitch and future sports and leisure development in the southern part of the allocation.
- 1.7. The principle of outdoor sports pitches on the site is accepted and the proposal is in accordance with the Local Plan allocation. Whilst the application has raised a number of issues and concerns as set down in this report, it is considered that subject to appropriate controlling conditions, these can be satisfactorily mitigated.

Reason for Committee

- 1.8. This application is referred to the Planning Committee at the discretion of the Head of Planning and Coastal Management under the terms of the Scheme of Delegation due to the level of public interest and significance of the scheme.

- 1.9. Members will note that there is a separate application (reference DC/21/0027/FUL) on the Agenda for consideration by this Planning Committee. This application seeks consent for a care home and extra care apartments on the adjacent site to the west (former Middle School). It too forms part of the Halesworth/Holton Healthy Neighbourhood allocation and, if approved, will help enable the delivery of the sports pitches proposed in this application.

Recommendation

- 1.10. Officers are seeking authority to approve the application with conditions, subject to completion of a Section 106 Agreement to ensure the timely provision of the sports pitches on the site (in order to off-set the pitches that will be lost due to the redevelopment of the former Halesworth Middle School Site (proposed by application DC/21/0027) thereby ensuring continuity of sports pitch provision.

2. Site description

- 2.1. The site extends to approximately 4.59ha of land on the south side of Harrisons Lane. The northern part of the site comprises of part of the former Halesworth Middle School playing fields along the Harrisons Lane frontage together with the former school entrance/exit points on Harrisons Lane. The central part of the site comprises mainly of the site of the former school buildings themselves whilst the southern part of the site comprises the agricultural field between the Dairy Hill Playing Fields to the west and Loam Pit Lane to the east. Adjacent to the central part of the site is the North Suffolk Skills Centre and adjacent to the eastern boundary in the southern part of the site is a residential property, Town Farm, a Grade II listed building accessed from Loam Pit Lane. Beyond the southernmost part of the site are more residential properties also accessed from Loam Pit Lane.
- 2.2. On the north side of Harrisons Lane opposite the site, are detached residential properties. There are two residential properties to the south of Harrisons Lane close to the junction with Norwich Road. The land to the east of the site and south of Harrisons Lane has outline planning consent for 190 houses (Ref. DC/18/4947/OUT).
- 2.3. The northern and central parts of the site are generally level. The southern part of the site comprising the agricultural field slopes from north to south with a level difference of some 6m.
- 2.4. Within the site is a small group of semi mature trees to the south of the site of the former school buildings and there is a small area of planted scrub vegetation to the east of the tennis courts. Along the Harrison Road frontage and along part of the eastern boundary is a mature hedgerow interspersed with trees.
- 2.5. Public Footpath 7 runs along Loam Pit Lane adjacent to the agricultural field in the southern part of the site and there is an existing foot/cycle path leading from Bungay Road to the former school site, along the southern boundary of the adjacent site.
- 2.6. The site forms part of the Halesworth/Holton Healthy Neighbourhood under Policy WLP4.1 of the Waveney Local Plan which allocates 22.05 hectares for a comprehensive mixed use development comprising:
 - Approximately 215 dwellings;
 - Health Care Facility and Retirement Community (approximately 2.3 hectares);

- Sports Facilities including, playing pitch, 3G pitch, and indoor sport facilities (approximately 8.6 hectares); and
- Education/Training Facility.

3. Proposal

- 3.1. This application relates to the first phase of a development bringing much needed new sports and recreation facilities to Halesworth and surrounding parishes proposed by Local Plan Policy WLP4.1 (Halesworth/Holton Healthy Neighbourhood).
- 3.2. The first phase of the development will include:
 1. Diversion of electrical power cables;
 2. A full sized, floodlit, all-weather (3G) pitch suitable for football match play for all ages and rugby training
 3. A full sized, floodlit Rugby, floodlit grass pitch which will be a multi-use area when possible
 4. Drainage and external infrastructure for the pitches
 5. Access and parking arrangements
 6. [If required] An interim grass pitch behind The Skills Centre, as a back-up, to ensure continuity of use for existing clubs.
- 3.3. Further elements of Policy WLP4.1, including indoor sports facilities and the replacement of the Apollo Youth Club are not included in this application but will be subject to future applications as and when funding is available.
- 3.4. The full sized grass pitch is proposed on the existing school playing field fronting Harrisons Lane and full size all-weather floodlit (3G) pitch on the field to the east of Halesworth Town Football Club, adjacent to Town Farm at the end of Loam Pit Lane. This pitch will be fully fenced in with 4.5m high anti-climb fencing, with spectator and team seating provided.
- 3.5. The land on which the 3G pitch is proposed currently slopes with a height difference of approximately 6m between the low point in the south up to the northern part of the site. Cut and fill will therefore be necessary in order to level the site as will diversion of the electrical power cables.
- 3.6. Vehicular access is proposed from Harrisons Lane. The submitted layout plan shows 117 car parking spaces on the site of the former school building to the east of the grass pitch, including 4 disabled spaces, and 24 covered cycle stands. A further 51 car parking spaces including electric vehicle charging points and 4 disabled spaces, and 24 covered cycle stands, are proposed adjacent to the 3G pitch.
- 3.7. The planning application is supported by the following documents:
 - Planning, Design and Access Statement
 - Transport Assessment
 - Flood Risk Assessment
 - Built Heritage Statement
 - Archaeological Report
 - Preliminary Ecological Appraisal
 - Contaminated Land Assessment

- Noise Assessment

- 3.8. The originally submitted application has been amended to address comments made during the consultation period. The revisions include a single point of access from Harrisons Lane. The existing eastern most access on Harrisons Lane is proposed to be widened to provide 2 way vehicular entry/exit. The existing western vehicular and pedestrian access is proposed to be closed off.
- 3.9. The revised access enables the grass pitch to be increased in size to accommodate a full size rugby pitch with run-offs. Further amendments to the proposed grass pitch include the provision of floodlighting, acoustic fencing and ball stop fencing/netting. Revisions to the 3G pitch include relocating the proposed acoustic fencing away from the boundary with the listed Town Farm.
- 3.10. A new pedestrian/cycle route is proposed to run through the site from the site entrance on Harrisons Lane. This route will connect into pedestrian/cycle routes to be created on the adjoining sites, including a new public right of way to the Cutlers Hill Surgery.
- 3.11. A site for an indoor sports building and pool (to be subject of a future planning application) is shown immediately north of the 3G pitch and multi-use game area courts are shown immediately to the east (also subject to a future planning application). The Apollo Youth Club is shown as remaining, with its redevelopment subject to a future planning application. A potential site for a new youth club is shown to the north of its current location but this has no influence on any future proposals to determine the continued provision of the youth club facility. The Town Council has recently initiated an intention to set up a working group to address long term future needs for the town.

4. Consultations/comments

- 4.1. Thirty four objections have been received from local residents raising the following matters (inter alia):
 - Environmental concerns regarding the use of a plastic artificial pitch due to the leaching of micro-plastics into the environment and ground waters (and eventually to the sea) and potential dangers from the toxic components in the rubber crumb
 - Overdevelopment of the site
 - Highway safety concerns due to additional traffic generation along Harrisons Lane and at its junction with Norwich Road
 - Harmful effect on the character and appearance of the landscape including from floodlighting and fencing
 - Inappropriate development in this part of the town, not in keeping with the surroundings
 - The proposed sports building is inappropriately located and at 4 storeys high, a dominating feature
 - Harmful to the setting of the listed building, Town Farm
 - Loss of outlook and view
 - Drainage and flooding concerns, including along Loam Pit Lane
 - Inadequate public consultation on the proposals
 - No details of changing and toilet facilities
 - Operating hours will cause noise and light pollution

- Loss of local identity and character compounded by other large developments in Halesworth
- Loss of green space and hedgerows
- Harmful to natural habitats and wildlife
- Inappropriately located adjacent to a care home and retirement living complex
- Fear of crime
- Loam Pit Lane is unsuitable for additional use
- Disruption during construction
- No guarantee that other aspects of the sports proposals will be forthcoming

4.2. Eight representations in support of the application have been received from local residents raising the following matters (inter alia):

- Halesworth would benefit from new sports facilities and will encourage sporting activities
- There is little in the town to occupy younger adults and teenagers
- At a time when more people are moving to the town it would be good to have more space for leisure activities
- Benefits for both physical and mental health
- In favour but object to artificial pitches
- The town needs more like this for the younger generation

4.3. Revised details were submitted to address comments made during the initial consultation period and were subject to a further period of consultation. Five representations have been received raising the following matters (inter alia):

- Noise pollution for occupants of properties adjoining the site
- The inappropriateness of the close proximity to proposed elderly accommodation and Town Farm
- Cyclists should have priority on Harrisons Lane
- There should be a cyclists entrance from Harrisons Lane direct to the cycle storage
- Hedging along Harrisons Lane should be protected
- Hours of operation should be restricted
- The amended plans do not address the ecological impacts micro-plastic run-off
- Potential of flooding drainage related problems affecting properties on Loam Pit Lane
- Loss of green space and space for nature
- Floodlighting affecting residential amenity

4.4 One representation supports the application but would like to know about the swimming pool.

5. Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Halesworth Town Council	22 January 2021	11 February 2021
Summary of comments:		

Extract from Halesworth Town Council's Extraordinary meeting on the 8th February, 2021. The decision was that the application is DEFERRED pending more information as noted below.

b) Ref. No: DC/21/0007/FUL Change of use to sports facilities comprising new grass football pitch adjacent to Harrisons Lane and construction of a new artificial football pitch with associated parking, access, lighting and drainage adjacent to the Apollo Youth Centre and adjacent field to the south Planning Application North Suffolk Skills Academy Harrisons Lane Halesworth Suffolk IP19 8PY

The Council considered the public comments at the meeting and online and whilst discussing the application it emerged that there were two main issues that required a clear understanding and further information.

Firstly there were concerns about the materials used to construct an artificial pitch, whether this was appropriate and necessary in these times of increased awareness of the damage caused by these materials to the environment, to wildlife and to human health. This concern was echoed online and at the meeting by members of the public.

Secondly, councillors were concerned by the control and management of the surface water of the whole site and in particular from the 3G pitch. Cllr Thomas informed the Council that surface water running down Loam Pit Lane is already a serious problem during prolonged rainfall. The planned area to be covered with hard and semi-permeable surface will only make matters worse unless measures are imposed which will effectively remove the risk of surface water flooding. Cllr Allen advised the Council that the pitch was semi-porous so it should not have a significant effect. However, this also brought to light questions of how the surface water management would deal with microfibers from the pitch.

Cllr Lewis drew attention to the uncertainty of the Apollo Youth Club's future as the site was further developed, these facilities would potentially be lost.

Whilst many councillors stated they would like to support the application in principle, these two issues in particular had made it very difficult to make a decision in such a short period of time. The Clerk confirmed that at the present time East Suffolk Council's deadline to submit the Town Council's decision was on Thursday.

It was agreed by all that the deadlines imposed were completely unreasonable in the current circumstances. The Council agreed that it would like these issues to be further investigated before making a decision, despite these deadlines. It was then RESOLVED that the Council DEFERS the decision on the application DC/21/0007/FUL pending further information and investigation from Campus and East Suffolk Council on the 3G pitch and surface water management. A delay would enable further public consultation to take place so that the Council and residents will be able to make informed decisions on this planning application which is not the case currently.

Concern was also expressed about the road width from the access road to the sports centre eastwards to the junction of Harrisons Lane with Fair View Road. There are proposals to widen Harrisons Lane westwards to Norwich Road but it is not clear if the rest of Harrisons Lane to Fairview Road will also be widened. This stretch of Harrisons Lane narrows as it goes down the hill to meet Fairview Road. It is anticipated that significant traffic will choose this route to and from the sports centre.

In practical terms this decision will require East Suffolk Council to defer the application as HTC does not have the power so to do. However, Ben Woolnough, Major Sites and Infrastructure Manager for East Suffolk Council, was also present at the meeting and informed the Council that he would relay this request to Phil Perkin, Principal Planner and case officer for this application.

The draft minutes of the meeting will be available from the Town Council's website <https://halesworthtowncouncil.org.uk/the-council/past-meeting-minutes/>

Statutory consultees

Consultee	Date consulted	Date reply received
SCC Highways Department	22 January 2021	29 January 2021

Summary of comments:

Holding objection. Whilst the proposal is acceptable in principle, details of the access and in particular sustainable links to the site require further information.

Consultee	Date consulted	Date reply received
SCC Flooding Authority	26 January 2021	16 February 2021

Summary of comments:

We are recommending a holding objection because further information is required.

Consultee	Date consulted	Date reply received
Sport England	22 January 2021	25 March 2021

Summary of comments:

Sport England does not wish to raise an objection to the principle of this application as it is considered to meet, exception 4 of the above policy, subject to further consideration of the issues raised by the rugby club/RFU and subject to conditions.

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	22 February 2021	No response

Summary of comments:

No response.

Non statutory consultees

Consultee	Date consulted	Date reply received
Norfolk And Waveney NHS CCG	31 August 2021	No response

Summary of comments:
No response.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	22 January 2021	5 March 2021

Summary of comments:
No objection subject to conditions.

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	22 January 2021	15 February 2021

Summary of comments:
As some trees are to be removed to facilitate this development, we seek clarification that these do not contain potential (bat) roosting features. The proposals should demonstrate measures that will achieve biodiversity net gain.

Consultee	Date consulted	Date reply received
East Suffolk Ecology	22 January 2021	19 February 2021

Summary of comments:
No objection, conditions recommended.

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	26 January 2021	No response

Summary of comments:
No response.

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	26 January 2021	1 April 2021

Summary of comments:
Internal response; see report.

Consultee	Date consulted	Date reply received
East Suffolk Drainage Board	10 February 2021	10 February 2021

Summary of comments:
We recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates

wherever possible.

Consultee	Date consulted	Date reply received
SCC Rights Of Way	22 January 2021	22 February 2021
Summary of comments: We accept this proposal subject to the following: A link is provided between the sites and Halesworth Public Footpath 17 at Dairy Hill to connect the development to the Doctors Surgery.		

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	22 January 2021	12 February 2021
Summary of comments: Internal response; see report		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	22 February 2021	12 March 2021
Summary of comments: Internal response; see report.		

Reconsultation consultees

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	31 August 2021	20 September 2021
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	31 August 2021	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	31 August 2021	1 October 2021
Summary of comments:		

No objection, conditions recommended.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	31 August 2021	21 September 2021
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
Halesworth Town Council	31 August 2021	21 September 2021

Summary of comments:
At the Extraordinary meeting of the Council on Monday 20th September, 2021, it was RESOLVED that the Council recommended refusal of the application DC/21/007/FUL on the followings grounds:-

1. The proposal did not reflect the local sporting and recreational needs of the local area as originally anticipated.
2. The loss of the Apollo Centre, a building of cultural value.
3. The surface water and flooding risks which had not been resolved
4. The environmental health issues and concerns associated with plastic pitches

The Clerk would also write to East Suffolk Council to advise them that the Council had not simply refused the application on the reasons stated above but was sufficiently concerned to request a referendum (or Poll) to seek the views of the residents again, assuming it was possible and effective to do so in the timescales and to seek ESC's advice and support and to emphasise the urgency and importance of this decision.

A full report of the meeting will be available on the Council's website shortly <https://halesworthtowncouncil.org.uk/the-council/past-meeting-minutes/>

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	31 August 2021	No response
Summary of comments: Internal response; see report.		

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	31 August 2021	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	31 August 2021	7 September 2021

Summary of comments:
Holding objection as additional information is required.

Consultee	Date consulted	Date reply received
SCC Highways Department	31 August 2021	2 November 2021

Summary of comments:
No objection subject to conditions.

Consultee	Date consulted	Date reply received
SCC Rights Of Way	31 August 2021	No response

Summary of comments:
No response.

Consultee	Date consulted	Date reply received
Sport England	31 August 2021	1 October 2021

Summary of comments:
Support the application subject to conditions.

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	31 August 2021	No response

Summary of comments:
No response.

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	31 August 2021	19 October 2021

Summary of comments:
Internal response; see report.

Consultee	Date consulted	Date reply received
East Suffolk Drainage Board	31 August 2021	No response

Summary of comments:
No response.

Publicity

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Major Application	29 January 2021	19 February 2021	Lowestoft Journal
Category	Published	Expiry	Publication
Affects Setting of Listed Building	29 January 2021	19 February 2021	Beccles and Bungay Journal

Site notices

General Site Notice	Reason for site notice: Affects Setting of Listed Building, In the Vicinity of Public Right of Way, Major Application Date posted: 29 January 2021 Expiry date: 19 February 2021
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6. Planning policy

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that "where in making any determination under the planning Acts, if regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise".
- 6.2. National Planning Policy Framework (2019) NPPF
- 6.3. National Planning Practise Guidance NPPG
- 6.4. The East Suffolk Council - Waveney Local Plan was adopted on 20 March 2019 and the following policies are considered relevant:
 - WLP4.1 - Halesworth/Holton Healthy Neighbourhood
 - WLP8.21 – Sustainable Transport
 - WLP8.22 - Built Community Services and Facilities
 - WLP8.24 - Flood Risk
 - WLP8.29 - Design
 - WLP8.30 - Design of Open Spaces
 - WLP8.34 - Biodiversity and Geodiversity
 - WLP8.37 - Historic Environment
 - WLP8.40 - ArchaeologyHistoric Environment Supplementary Planning Document

7. Planning considerations

Planning Policy

- 7.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) sets out that "if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise." This is reflected in paragraph 12 of the NPPF, which affirms the statutory status of the development plan as the starting point for decision making.
- 7.2. The development plan comprises the East Suffolk Council - Waveney Local Plan ("local plan") and any adopted neighbourhood plans. The relevant policies of the local plan are listed in the section above and will be considered in the assessment to follow. It is important to also note that NPPF paragraph 11 requires that planning decisions apply a presumption in favour of sustainable development and that means, for decision-taking, approving development proposals that accord with an up-to-date development plan without delay.

Principle of development

- 7.3. The site is sustainably located within the settlement boundary for Halesworth and forms part of the Halesworth/Holton Healthy Neighbourhood allocation under Policy WLP4.1 of the East Suffolk Council - Waveney Local Plan (2019). The principle of development on the site is therefore accepted. For completeness Policy WLP4.1 reads as follows:

The Halesworth/Holton Healthy Neighbourhood (22.05 hectares) as identified on the Policies Map is allocated for a comprehensive mixed use development comprising:

- *Approximately 215 dwellings;*
- *Health Care Facility and Retirement Community (approximately 2.3 hectares);*
- *Sports Facilities including, playing pitch, 3G pitch, and indoor sport facilities (approximately 8.6 hectares); and*
- *Education/Training Facility.*

The site should be developed in accordance with the following site specific criteria:

- *Residential development will be located on the northern and eastern parts of the site, which has an area of 7 hectares. The site will be developed at a density of approximately 30 dwellings per hectare.*
- *The health care facility and retirement community will be located on the north western parts of the site.*
- *The sports facilities will be located on the central parts of the site. Sports facilities on the site should include a 3G artificial pitch for all weather sports provision. This should be enabled by residential development on the site and appropriate delivery mechanisms and triggers will need to be agreed with the Council, in consultation with Sport England, to ensure the comprehensive development of the whole site in a coordinated and timely way.*
- *Redevelopment of the site will include replacement of the Apollo Youth Club.*

- *The North Suffolk Skills Centre will be retained on the site to be used for educational, voluntary and community purposes. This includes providing accommodation for local community organisations.*
- *Existing facilities at Dairy Hill, including the sports pitches, martial arts school, tennis courts, bowling green and children's play space, will be retained.*
- *Access to the residential development should be from Harrisons Lane.*
- *Existing trees and hedges on the site will be retained. There should be tree planting along the eastern edge of the site totalling 2.5 hectares to minimise landscape impact of the site.*
- *Development should be designed to encourage walking and cycling. Existing public rights of way on the site will be retained and new pedestrian access provided to include connectivity both within the site and with neighbouring parts of Halesworth. Loam Pit Lane should provide pedestrian and cycle access to the site.*
- *A Transport Assessment and Travel Plan should be submitted with any planning application.*
- *Any planning application is to be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.*
- *A completed ecological assessment undertaken by a suitably qualified person will be required as part of any planning application.*

7.4. The principle of sports pitch provision on the site is therefore established. The proposal will help deliver the vision of the Halesworth Campus and Halesworth Health to provide additional sporting and health facilities in the town. The plans of these organisations will help promote healthier lifestyles for new residents and existing residents alike.

Background Information

7.5. Following the closure of Halesworth Middle School Suffolk County Council transferred the site to Halesworth Campus Ltd. (the applicant), in order to enable them to provide (and enhance) the provision of local sport and recreation facilities in the town.

7.6. The following is an extract from the Planning Statement:

- *Halesworth Campus (HC) is aiming to sell 6.3 acres of its land for health and care development in order to raise funds to put towards the cost of the new sports facilities. Following a competitive procurement exercise, our (Halesworth Campus) preferred health and care partner is Castlemeadow Care (CMC). CMC is ready to purchase the land in order to build and operate the proposed new nursing home and extra-care apartments.*
- *Again, following competitive procurement, Pulse Design and Build (PDB) is lined up to design and build the new sports and recreation facilities. A contract has been signed with them.*
- *Sentinel Leisure Trust (SLT) will equip, operate, and manage the new facilities. We are aiming to have a contract in place with them by July 2021, a year in advance of opening.*

- *HC is also aiming to sell 2.7 acres of land for housing development in order to raise further funds to put towards the cost of the new sports and recreation facilities. Initial discussions have taken place with Orwell Housing (OH) as a potential housing partner.*

- 7.7. This application will provide enhanced sports pitches that will replace the pitches that will be lost due to the proposed redevelopment of the former Middle School site by Castle Meadow Care - see application DC/21/0027/FUL, also presented to this Planning Committee for consideration.
- 7.8. The intention is that Halesworth Campus will sell the site to Castle Meadow Care in order to raise funds to put towards the cost of the sports pitches proposed in this application. However, Suffolk County Council will hold the funds from the sale of the land which Halesworth Campus will be able to draw down for the purpose of sports and recreation development. The funds would only be released when an appropriate and deliverable project for replacement sports infrastructure is able to proceed.
- 7.9. The priority for the Council is to ensure the timely re-provision of the Middle School Sports Pitches. The Infrastructure Delivery Framework of the Waveney Local Plan recognises two phases of sports development for Halesworth:
- 7.10. With reference to the Infrastructure Delivery Plan (IDF) of the Local Plan, Phase 1 is an essential priority to replace the sports pitches, comprising the provision of a community 3G pitch and grass pitch and Phase 2 is a desirable priority comprising the provision of directly associated sports facilities such as changing rooms for the pitches.
- 7.11. Phase 1 forms this application. The Phase 2 elements do not form part of this planning application but would be the subject of a future application.

Funding

- 7.12. Funding for Phase 1 is accounted for by a combination of £1,641,997 of Community Infrastructure Levy (CIL) (which has been approved by Cabinet) and the sale of the land to CMC (£1,300,000). This funding towards 'Essential' infrastructure is justified by the Infrastructure Delivery Plan (IDF) of the Local Plan and supported by the CIL Spending Strategy. The availability of funding therefore gives confidence that the enhanced replacement pitches can be provided in a timely manner (to compensate for those that will be lost by Castle Meadow Care's proposed development). The CIL funding is also subject to a Community Use Agreement being established.
- 7.13. Funding for Phase 2 is not established the scope to deliver phase two should not affect determination of this application. However, planning permission and the delivery of Phase 1 will enable Halesworth Campus to explore moving on to Phase 2 with greater confidence. At this point Phase 1 must remain the sole priority for the site as it is both mitigation for other development and a necessary benefit for the community acknowledged in the Local Plan.

Highway Considerations and Pedestrian Connectivity

- 7.14. As noted above it is proposed to close one of the vehicular access points on Harrisons Lane and widen the eastern access to provide a single point of entry/exit. As this has been agreed

with Suffolk County Council Highway Authority it can be concluded that this arrangement will provide a safe and convenient vehicular access.

- 7.15. The proposed layout plan shows the existing cycle/pedestrian route along Harrisons Lane extended across the site frontage and connecting with the adjacent residential site where outline consent exists for 190 houses (DC/18/4947/OUT).
- 7.16. Pedestrian/cycle access into the site is proposed off Harrisons Lane alongside the vehicular access. From within the site the proposed layout shows pedestrian/cycle links to the adjacent housing sites and to the adjacent care home/assisted living proposals by Castle Meadow Care (CMC) to the west (Application DC/21/0027/FUL). The proposed layout plan shows a new public right of way created from the CMC site to Cutlers Hill Surgery, which can be secured through a S106 contribution. There is also the potential to extend this route southwards to connect into the existing Public Right of Way network. The layout plan also shows a direct connection from the site onto Loam Pit Lane which is also a Public Right of Way. The Highway Authority have considered the application and raise no objections to the revised proposals subject to conditions including details of the pedestrian and cycle links to adjacent sites. Subject to these details it is considered that the proposal will provide good pedestrian connectivity both within the site and to neighbouring parts of Halesworth, thereby encouraging walking and cycling to and from the site, in compliance with Policy WLP8.21.
- 7.17. The following text is included in the report for DC/21/0027/FUL:

“There should also be good pedestrian connectivity within the site particularly as the Cutlers Hill surgery is located a short distance to the south. It is considered unacceptable if the proposal did not provide a direct route pedestrian route to it, otherwise there would be a less convenient circuitous route for patients needing to access the facility, and indeed for G.P’s needing to visit patients. It would be a lost opportunity not to provide this link which will improve the connectivity of the site. It will be noted that Suffolk County Council Public Rights of Way Team support the proposal subject to the provision of a link to Public Footpath 17 at Dairy Hill to connect the development to the Doctors Surgery, Public Footpath 17 then connects with Halesworth Public Footpath 7. In addition the sports land will connect with the new route, through to the northern part of Footpath 7) Loam Pit Lane, into the Harrisons Lane housing development and onwards into the open space of the Hill Farm Road (Hopkins) development. The result will allow for off-road circular walks and enhanced east-west connectivity (including across to Holton) avoiding the use of any roads, thereby providing good connectivity to the surrounding network as required by Policy WLP8.21.

Ensuring this application provides a pedestrian link to the Cutlers Hill Surgery can be secured through a S106 contribution. Because the new Public Right of Way will involve third party land, specifically the edges of the football pitches owned by the Halesworth Community Sports and Leisure (HCSL) charity, the creation of this route will involve either a Public Right of Way Creation Agreement or Creation Order. Hopefully the former of the two process could progress through collaborative working with HCSL if that isn’t possible the funding would also cover a order making process. The funding request also includes the cost of repositioning of fencing.”

- 7.18. The above content of the application shows the role of that Public Right of Way funding in not just connecting the care development but also this sports facility across the town. Over recent years it is clear that relations between Halesworth Campus and Halesworth Community Sports and Leisure (HCSL) have not been good and this is disappointing considering that the Campus proposals originated from the two working together. However there have been recent changes in the Trustees of HCSL and if this application is approved the Council is keen to build bridges and ensure that the two sports facilities work together and form linkages, including physical connections in the interests of the sports and leisure needs for the community. The role of pedestrian connectivity in enabling that should not be underestimated.
- 7.19. In terms of parking, it is proposed to retain existing areas of hardstanding to accommodate sufficient car parking and safe access as the programme develops. The proposed layout shows 22 existing carparking spaces retained to the east of the grass pitch and a further 87 (including 4 disabled) carparking spaces to the south mostly on the site of the former school buildings. Adjacent to the eastern boundary of the grass pitch are 24 covered cycle stands.
- 7.20. The layout plan shows 51 (including 4 disabled) car parking spaces proposed to the north of the 3G pitch and a total of 32 covered cycle stands immediately adjacent to the pitch. A further 8 covered cycle stands are shown adjacent to the boundary of the CMC site at the point where the cycle/pedestrian link from Bungay Road enters the site.
- 7.21. For outdoor sports pitches Suffolk County Council's Guidance for Parking (2019) recommends that there should be 20 parking spaces per pitch plus 1 space per 10 spectator seats and 20 cycle spaces plus 1 space per 10 vehicle spaces. The Highway Authority raise no objection in terms of parking provision and therefore it can be considered sufficient to serve the proposal.

Environment and Ecology

- 7.22. As will be noted above concerns have been expressed about the environmental impact from the use of a plastic artificial pitch due to the leaching of micro-plastics into the surface water run-off and into local watercourses and potential dangers from the toxic components in the rubber crumb.
- 7.23. In responding to these concerns the applicant has stated that the inclusion of an edge board to the perimeter of the pitch will help to mitigate any migration of the crumb base from the pitch. It has also been confirmed that full maintenance of the pitch, to include frequent brushing, will also help with the presence of any crumb on the pitch surface. The applicant further contends that the site is not close to any local watercourses where migration could be an issue, with the nearest being to the east of Bungay Road and west of Quay Street.
- 7.24. The Lead Local Flood Authority have given detailed consideration to the proposed surface water drainage strategy (see below), but on this issue they advise as follows:

“for this type of sports pitch the surfaces are generally permeable with water draining through the surface layer, into either a sub-base, attenuated crate system, or a mixture of the two depending on the sites surface water attenuation requirements. As such, there shouldn't be any runoff generated from the pitch which would runoff to other parts of the site. This is helped by the fact the pitches are flat so any surface water during extreme rainfall is likely to pond on the pitch surface, as opposed to being shed off. Therefore, in

terms of the plastics, there should not be any reason for surface water, and thus plastics suspended in surface water runoff, to leave the pitch. Nor can the plastics work their way through the surface layers into the below surface storage as this would be protected by a permeable geotextile”.

7.25. The applicants’ comments regarding the use of edge boarding and full pitch maintenance, combined with the LLFA’s comments does provide assurance that micro plastic run-off from the site is unlikely to pose a significant threat to the integrity of the environment.

7.26. Sports England’s Position Statement on 3G pitches is as follows:

Third generation or 3G artificial grass pitches are recognised as durable, safe, year-round playing surfaces, able to withstand intensive use and all kinds of weather. They mean more people can benefit from all the associated social and health benefits of physical activity.

Concerns have, however, been raised about the safety associated with these pitches and their constituent parts, most commonly the presence of rubber crumb. We take these concerns very seriously.

We have monitored numerous independent scientific studies on this issue, which have reported a very low/negligible level of concern for human health as a result of 3G pitches and rubber crumb.

Indeed, the European Chemicals Agency has recently published its own findings, following an extensive EU-wide study, and has found no reason to advise people against playing sport on 3G pitches with rubber crumb.

The Sports and Play Construction Association, the UK trade body for the sports pitch industry, is developing a voluntary industry standard that will provide minimum requirements that go above and beyond what is currently required for rubber crumb under European regulation. Sport England and leading sport governing bodies all support this approach and will continue to work with the industry to provide reassurance that pitches in this country are safe.

7.27. Standard 3G pitches have been installed successfully on many sites both in East Suffolk and nationally, and in providing a year-round playing surface are popular facilities that are well used by the local communities they serve. The East Suffolk Council Waveney Local Plan doesn’t contain any planning policies that specifically relate to pollution from plastic or other building materials. Whilst Officers acknowledge that the use of an artificial grass pitch, and embodied carbon in materials and modern methods of construction generally, are becoming of increasing interest to the public in the current climate, these are not currently material planning issues that can be taken into account in the determination of this application. Further research into these issues may be undertaken in the future, but in the absence of relevant legislation and/or evidence on these issues Officers are of the view that there is no justification on planning grounds, to require an alternative specification for the 3G pitch to that being proposed.

7.28. The proposal clearly conforms to an adopted policy of the Local Plan. Whilst the concerns about the use of an artificial grass pitch are acknowledged it is considered that the risks to the

environment are low and that this risk and the concerns expressed, are outweighed by the social and health benefits of physical activity associated with the proposal.

- 7.29. A Preliminary Ecological Appraisal (PEA) has been submitted with the application. The objectives of the appraisal were to identify the habitats and species present or potentially present on the site and identify any appropriate mitigation measures. The site primarily comprises arable land, managed amenity grassland, post-demolition cleared hardstanding and scrub and is generally assessed as being of low ecological value.
- 7.30. The PEA proposes mitigation measures including the protection of identified reptile habitat, seasonal restrictions to scrub removal, retention of hedges and design of external lighting. A number of ecological enhancements are also proposed, which would improve the quality of the site for native flora and fauna, including hedgehog friendly fencing, bat boxes, and inclusion of native species in planting schemes.
- 7.31. The Council's Ecologist has reviewed the application and raises no objection subject to the development being carried out in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the PEA. These measures can be secured by condition. The Ecologist also recommended a condition limiting the time that the floodlights are on to only when the pitch is in use to avoid the area being lit for longer than is necessary.
- 7.32. The conditions recommended by the Ecologist are considered relevant and necessary to ensure that, in the event that planning permission is granted, the impact on wildlife species and habitats is mitigated and would give rise to some minor beneficial impacts.
- 7.33. The Design and Access Statement states that there are some minor, non-significant trees to be removed. The Council's Arboricultural and Landscape Officer raises no objection to the application on tree grounds and does not consider that there will be any significant impacts on wider landscape character which is to a degree, within the urban context. There is buffer planting indicated to the south east sector of the development. Full details of this along with any other proposed planting can be secured by condition if consent is granted.

Residential Amenity / Noise considerations

- 7.34. Local Plan Policy WLP8.29 – Design, states inter alia, that development proposals should protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers of the proposed development. There are two main considerations in this respect; firstly, there is the consideration of existing residential properties in the locality, most notably along Harrisons Lane and Loam Pit Lane, and secondly there is the consideration of the occupiers of the proposed care home on the adjacent site (although this is more of a consideration for application DC/21/0027/FUL than this application).
- 7.35. A noise assessment has been submitted which proposes noise mitigation measures. For the grass pitch adjacent to Harrisons Lane a 3m high acoustic barrier along the western and southern site boundaries with the proposed residential care home is proposed. No acoustic fence is proposed along Harrisons Lane, but this is considered justifiable given that this area is currently in use as a playing pitch and has been for many years. Furthermore, a 3m high fence

along this frontage would be an unsightly addition that would detract from the character and appearance of the street scene. It is appropriate for an acoustic fence to be erected on the boundary with the care home as this development needs to mitigate itself from any potential noise sources. As such the fencing would be expected to be provided and maintained on the adjacent site as part of application DC/21/0027/FUL.

- 7.36. Noise mitigation measures for the 3G pitch include the erection of acoustic fencing to the north and south of the pitch. This will reduce noise from player activities on the pitch affecting the residential properties to the south and at Town Farm. To mitigate the noise from balls striking perimeter fencing neoprene washers can be installed to the fixings of metal fence panels. Full details of acoustic and perimeter fencing can be secured by condition.
- 7.37. The Environmental Protection Officer has considered the application and raises no objection subject to the implementation of the noise mitigation measures, control over the hours of use of both the grass pitch and the 3G pitch and the submission of a Construction Management Plan to control noise, dust, and light so as to not cause nuisance to occupiers of neighbouring properties. These aspects can be secured by condition.

Heritage Impacts

- 7.38. There are 2 Grade II listed buildings houses close to the site. Wisset Place is located at the junction of Old Station Road and Norwich Road, approximately 50m from the sites northern boundary. Town Farm is located immediately to the east of the site on Loam Pit Lane.
- 7.39. Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duty to have special regard to the desirability of preserving the setting of a listed building.
- 7.40. A Built Heritage Statement (BHS) has been submitted which complies with the requirements of Paragraph 194 of the NPPF and Policy WLP8.37. Officers are in agreement with the BHS that the site forms a small part of the setting of Wisset Place and that the proposal will be seen within the context of existing development and will have no impact on how the significance of the listed building is appreciated or understood.
- 7.41. With regards to Town Farm initially there was a 3m acoustic fence proposed adjacent to the boundary of the property creating a tall impermeable boundary that would have had a significant visual impact on the immediate setting of the listed building. The amended proposed layout shows the fence around the 3G pitch, away from the boundary with the listed building, which is an improvement which reduces the harm to the setting of Town Farm.
- 7.42. Officers agree with the conclusion of the BHS that the proposal will result in an erosion but not total loss of Town Farm's setting and that the level of harm would be less than substantial. Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 7.43. The proposal will deliver sports pitches in accordance with an adopted policy of the local plan. It is considered that the public benefits of enhanced sports facilities to the local community

that will arise, will outweigh the less than substantial harm caused to the setting of Town Farm.

- 7.44. Landscaping could also help mitigate the impact of the development on Town Farm and a landscaping scheme could be secured by condition should the application be approved.

Drainage and Flooding

- 7.45. Policy WLP8.24 - Flood Risk, states, inter alia, that developments should use sustainable drainage systems to drain surface water. Sustainable drainage systems should be integrated into the landscaping scheme and the green infrastructure provision of the development and not detract from the design quality of the scheme. They should deliver water quality and aquatic biodiversity improvements wherever possible.
- 7.46. The site lies within Flood Zone 1 which has the lowest probability of a flood risk event occurring (less than 1 in 1000 annual probability). The submitted Flood Risk Assessment states that the surface water drainage strategy for the site has been developed using Sustainable Drainage System (SuDS) techniques.
- 7.47. The overall philosophy of SuDS is to replicate, as closely as possible, the natural drainage process of a site prior to development to mitigate the adverse effects of urban storm water runoff on the environment. SuDS provide the ability to manage surface water discharge rates and volumes but also improve water quality, ecology and amenity within the development.
- 7.48. The issue of surface water drainage has been the subject of much discussion with Suffolk County Council as Lead Local Flood Authority (LLFA) who initially lodged a holding objection on the grounds that additional information was required to demonstrate that the site can be drained satisfactorily.
- 7.49. In seeking to address the holding objection a geotechnical site investigation and stormwater network modelling for the site was carried out. The results from both of these assessments formed the basis for a revised Flood Risk Assessment.
- 7.50. The proposed Surface Water Drainage Strategy for the development consists of surface water run off to be directed to an infiltration basin in the south of the site from where it will be discharged into the ground. The drainage strategy will result in a reduction in peak runoff rates discharging from the site.
- 7.51. Whilst initial testing has proved positive the LLFA are of the view that further testing is required. In the event that further testing proves that infiltration into the ground is not viable or is slower than anticipated the LLFA have requested a "back-up" strategy for discharging surface water. The proposed "back-up" strategy involves discharging water from the infiltration into the ditch which runs along the western boundary of the site.
- 7.52. The revised Flood Risk Assessment has been considered by the LLFA who raise no objection on drainage grounds subject to pre-commencement conditions requiring further testing of the ground conditions. On the basis of the proposed infiltration and "back up" strategy it is considered that the proposed surface water drainage strategy is generally in accordance with Policy WLP8.24 and can be supported, subject to conditions recommended by the LLFA.

Assessment against Sport England Policy and Continuity of Sports Field use during construction period

7.53. As this application affects land that has been used a playing field it is a statutory requirement to consult with Sport England. This application relates to the effect of application DC/21/0027/FUL causing the partial loss of the former Halesworth Middle School playing fields which have been maintained to an extent since the closure of the middle school and used mostly in recent years for midweek training by Southwold Rugby Club, who use portable floodlights during the winter months. Irrespective of the level of recent use, the quantum of pitch space on the site is relevant to considerations in respect of the loss of this asset and its replacement. For this reason, there has been close engagement through the application process with Sports England, the Rugby Football Union (RFU) and the Suffolk branch of the Football Association (FA). At the same time as this, the Council has been working with consultants to produce an up-to-date East Suffolk Leisure Strategy, which has comprehensively considered all sports and leisure facilities and needs across the district, including engagement with clubs, organisations and communities. That has not yet been published but the consultants have also been involved in relevant sports meetings related to this application and have factored proposals into their work. It may be possible to provide extracts of that work in the update sheet.

7.54. 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 a playing field

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

Assessment against Sport England Policy:

7.55. This application relates to the loss of existing playing fields and/or the provision of replacement playing fields. It therefore needs to be considered against exception 4 of Sport England’s playing field policy, which states:

‘The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.’

7.56. Sport England have assessed the application against exception 4 as follows:

The proposal relates to phase 1 of the redevelopment of Halesworth Campus to provide a retained grass football pitch and a new floodlit 3G pitch. Phase 2 will add a tennis/netball multi use games area (MUGA) and indoor sports building.

With regard to the quantitative assessment, the existing playing field covers an area of 2.96 hectares, of which 0.89 hectares will be retained. The new playing field will cover an area of 1.7 hectares, with the sports hall covering an area of 0.7 hectares.

This means that when both phases are built there will be 3.3 hectares of new sports facilities, in excess of the existing quantity, with 2.6 hectares being delivered in phase 1.

From a qualitative perspective, the 3G pitch will result in a significant qualitative improvement in facility provision on the site as the facility will be able to be used far more than grass pitches of equivalent quantity and will be used weekday evenings and weekends for training and matches.

With regard to management of the facilities, a contract is likely to be signed in July 2021 with Sentinel Leisure Trust to manage the facilities on behalf of the trust.

It should be noted that East Suffolk Council have recently commissioned a Playing Pitch Strategy for the district, and assessment work has recently commenced, with this proposal feeding into this strategic assessment.

Football

7.57. The Local Football Facility Plan (LFFP) for East Suffolk suggests a significant shortfall of current 3G facilities in the area, and subsequently a project has been highlighted for a new Floodlit 3G FTP in the Halesworth area. The LFFP for East Suffolk details that 'Halesworth has been identified as an area in need of 3G provision although further work is required to fully determine partner clubs. Halesworth Campus provides a potential venue. A smaller sized pitch would be the preferred option based on existing football demand.'

7.58. Halesworth Town FC are a small, growing club who have aspirations to develop more teams to service the local community. The club are currently restricted on their existing Dairy Hill site and have limited capacity to expand within their current facility restrictions. It is considered that the proposal could have a significant positive impact on increasing participation of football within the local area.

7.59. To protect the long term usage of the site for football Sport England recommend that a Community Use Agreement is in place and this is also a requirement of the CIL funding

Rugby

7.60. Some comments have been raised in respect of Southwold Rugby Club using a Halesworth Facility. It should be noted that Southwold Rugby Club serve a very wide area with more members from outside of Halesworth than within Southwold. They are without a Southwold based training facility and there is no reason why they should have to relocate from Halesworth based on name. They are established on the site and therefore the need to be

catered for. Diversity in sports provision is a positive thing and should territoriality between sports should not affect planning decisions.

- 7.61. The existing grass pitch is currently the established mid-week training ground for Southwold Rugby Club and as an established user of the site, they need to be catered for in the revised grass pitch proposals. The development of the site does decrease the amount of natural turf pitches on the site, and as such all new facilities on the site would need to be fit for purpose and rugby compliant in both specification and dimensions, the inclusion of fixed high quality specification sports lighting.
- 7.62. Consequently, the revised layout plan now shows a full-sized Rugby Pitch with run off areas, permanent lighting and Ball stop fencing/netting. The revised Planning Statement also includes the following statements regarding continuity of sports field use during the construction period:

Continuity of Sports Field use during construction period.

The current use of the 'closed' Halesworth Middle School site is restricted to rugby training 3 nights per weeks for 2 hours for Southwold Rugby Club with a recent addition of Halesworth Town Football Club of 1 night per week at 2 hours (which we will be looking to increase). There is a portable floodlighting provision which allows all year-round use.

There is currently the equivalent of a full-sized pitch marked out to the north of the site to support training use.

There are fixed rugby posts in place and portable football goals available to support the training sessions. This use can continue during the construction period of the 3G pitch and due to the timeline development of the assisted living/extra care apartments there will not need to be any changes until the 3G is ready for use.

Once the construction programme of the assisted living/extra care apartments commences the 3G pitch will be ready for use and an area of grass (the size of a full football/rugby pitch) will be retained principally for training but also for match play purposes if required to meet the demand. However, should the grass pitch on site not be available for any reason, the training ground can be relocated over to the Eastern field behind the Skills centre. An Agronomist Report has been carried out (and included in this planning submission). The report recommendations would be implemented to bring the field up to standard, should it be required, and the field transformed into a temporary pitch.

- 7.63. In addition to the above the following has been confirmed:

- The land to the rear of the skills centre could be used as playing field if needed
- The existing playing field will continue to be accessible to the rugby club until the 3G pitch is completed
- A full sized grass pitch will be retained with rugby being the preferred user.
- The 3G pitch will be suitable for rugby training
- The 3G pitch will be subject to a community use agreement

- 7.64. To further ensure continuity of sports field use whilst the 3G pitch is being completed Castle Meadow Care have agreed to provide a licence to Halesworth Campus to allow the site of apartment block A to continue being used for playing pitches for a minimum of 12 months. A section 106 Agreement is considered appropriate to secure this licence. However the conditions on phasing should avoid the need to rely on the licence, which is a civil arrangement.
- 7.65. A phasing plan submitted with the Castle Meadow Care application DC/21/0027/FUL will ensure that the existing pitch will remain in operation during the construction of the care home. In addition, it is considered necessary to retain control over the timing of the provision of the new grass pitch. This can be achieved by imposing a condition on application DC/21/0027/FUL that prevents any construction of the extra living apartments until the new grass pitch has been completed.
- 7.66. Sport England have considered the application, revised proposals and additional information and have confirmed that the Rugby Football Union (RFU) and Southwold Rugby Club are broadly supportive of the changes that have been made to the grass pitch subject to a community use agreement being in place for the grass pitch and 3G pitch prior to the commencement of development. The community use agreement would include details of pricing policy, hours of use, access by local clubs and informal use, management responsibilities and a mechanism for review, and is considered essential to ensure community access to the sports facilities.
- 7.67. The applicant has confirmed that Draft terms for a 20-year agreement for community use have been shared with the following potential partners: Halesworth Town Football Club; Southwold Rugby Club; Edgar Sewter Primary School; Suffolk New College (Halesworth Skills Centre) and Spexhall Football Club, and that work is ongoing to agree time slots and costs.
- 7.68. A community use agreement is considered necessary to ensure the pitches are accessible to the community and can be secured by condition, as recommended by Sport England.
- 7.69. From a football perspective, Sport England consider it critical that Halesworth Town Juniors FC retain access to the floodlit grass pitch during the period when the 3G pitch is being constructed, and the hours of availability for the football club should be set out in the community use agreement.
- 7.70. Sport England are also of the view that if the grass pitch to the rear of the Skills Centre is needed, this should be provided by the applicant, and no costs should be incurred by the football club.
- 7.71. As the RFU are now supportive of the project, Sport England have confirmed that they are now in a position to support the application, subject to conditions listed below, as it meets exceptions 4 and 5 of their playing fields policy.
- 7.72. The conditions recommended by Sport England will ensure the pitches are designed to an acceptable specification and will remain accessible to current and future users.

Other considerations

- 7.73. Policy WLP4.1 states that redevelopment of the site will include replacement of the Apollo Youth Club. Demolition of the youth club does not form part of the application. It indicates that the youth club is to remain and that its redevelopment would be subject to a future planning application and later phase of development. An option for an alternative site is indicated on the submitted layout plan but that does not define any conclusion on its reporvision.
- 7.74. It is considered that there is no reason why both this first phase of the Campus redevelopment and the retention of the Apollo youth club cannot continue alongside each other and compliment each other. However the building could be considered as being past its use by date and a solution for its long term replacement (i.e. the next 30 years) needs to be planned as this is a policy requirement. The Campus will therefore need to work with the Apollo and the community to ensure that this facility is maintained/re-provided either on this site or elsewhere. The Town Council has recently initiated an intention to set up a working group to address long term future needs for the town.

Public Benefits of the Proposed Development

7.75. The proposed development will deliver a number of public benefits including:

- Improved playing pitches including 3G pitch as part of the plan-approach to development in Halesworth;
- Creation of a new footpath providing a direct link from the development to Cutlers Hill Surgery;
- Cycle/footway links to adjoining sites;
- Economic benefit in the short-to-medium term through creation of jobs in the construction industry;

8. Conclusion

- 8.1. The proposal is acceptable in principle as the site is allocated for development by local plan Policy WLP4.1. The development is therefore sustainably located to serve the local community by delivering the first phase of the sports facilities proposed by the policy, a significant benefit of the scheme. The proposal therefore accords with the plan-led approach to development in Halesworth.
- 8.2. It is acknowledged that the proposal will result is a considerable change to the existing character and appearance of the site and that it is not supported by some local residents and the Town Council. The concerns raised have been given due consideration by officers, particularly those regarding environmental impacts and drainage, but do not, in the balance, indicate that planning permission should be refused. Many of the matters raised can be mitigated by appropriately worded planning conditions.
- 8.3. The proposal is considered to represent sustainable development in accordance with the objectives of the National Planning Policy Framework (2021) and the Development Plan as a whole. There are no significant, or unacceptable environmental impacts arising from the

proposals. There are also substantial public benefits that would otherwise justify approval as detailed above.

9. Recommendation

9.1. Authority to APPROVE with the conditions set out below and subject to the completion of a S106 Legal Agreement within six months to secure the following obligations:

- Footpath link to Cutlers Hill Surgery
- licence to allow the site of apartment block A (subject to application DC/21/0027/FUL) to continue being used for playing pitches for a minimum of 12 months.

9.2. If the S106 is not completed within 6 months authority to REFUSE the application.

9.3. Conditions:

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall be completed in all respects strictly in accordance with Drwg. No. 169 03 T received 20 August 2021, for which permission is hereby granted or which are subsequently submitted to and approved by the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority.

Reason: For the avoidance of doubt as to what has been considered and approved.

3. A Demolition and Construction Management Strategy shall be submitted to and approved in writing by the Local Planning Authority prior to work commencing on site. The strategy shall include access and parking arrangements for contractors vehicles and delivery vehicles (locations and times) and a methodology for avoiding soil from the site tracking onto the highway together with a strategy for remedy of this should it occur. The development shall only take place in accordance with the approved strategy.

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase. This is a pre-commencement condition because an approved Management Strategy must be in place at the outset of the development.

4. All internal footways and cycleways shall be laid out according to drawing no. 169 03 Rev.T.

Reason: To ensure that appropriate pedestrian and cyclist access can be maintained across the site.

5. Before first use of the site, details of the pedestrian and cycle links to the adjacent development site should be submitted and approved by the local authority.

Reason: To allow for the site to be accessed by pedestrians and cycles in a safe manner and to promote sustainable transport methods.

6. No other part of the development hereby permitted shall be commenced until the new access has been laid out and completed in all respects in accordance with drawing no. 169 03 Rev. T. Thereafter it shall be retained in its approved form.

Reason: To ensure the access is laid out and completed to an acceptable design in the interests of the safety of persons using the access and users of the highway. *This needs to be a pre-commencement condition because access for general construction traffic is not otherwise achievable safely.

7. The use shall not commence until the area(s) within the site shown on drawing no. 169 03 Rev. T for the purposes of loading, unloading, manoeuvring and parking of vehicles has / have been provided and thereafter the area(s) shall be retained, maintained and used for no other purposes.

Reason: To ensure that sufficient areas for vehicles to be parked are provided in accordance with Suffolk Guidance for Parking 2019 where on-street parking and or loading, unloading and manoeuvring would be detrimental to the safe use of the highway.

8. Before [the development is commenced / any building is constructed above ground floor slab level] details of the areas to be provided for the secure, covered and lit cycle storage including electric assisted cycles shall be submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.(or for dwellings) The approved scheme shall be implemented for each dwelling prior to its first occupation and retained as such thereafter.

Reason: To promote sustainable travel by ensuring the provision at an appropriate time and long term maintenance of adequate on-site areas and infrastructure for the storage of cycles and charging of electrically assisted cycles in accordance with Suffolk Guidance for Parking 2019. This is a pre-commencement condition because it must be demonstrated that the development can accommodate sufficient cycle storage before construction works may make this prohibitive and in the interests of ensuring that sustainable transport options are provided.

9. Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Ecological Impact Assessment (EclA) (The Landscape Partnership, December 2020) as submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

10. No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

11. No development affecting areas of suitable reptile habitat, as identified in Ecological Impact Assessment (EClA) (The Landscape Partnership, December 2020), shall take place (including any demolition, ground works, site clearance) until a method statement for reptiles has been submitted to and approved in writing by the local planning authority. The content of the method statement shall include the:

- a. purpose and objectives for the proposed works;
- b. detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
- c. extent and location of proposed works shown on appropriate scale maps and plans;
- d. timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- e. persons responsible for implementing the works;
- f. initial aftercare and long-term maintenance (where relevant);
- g. disposal of any wastes arising from works.

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To ensure that ecological receptors are adequately protected as part of the development.

12. The locations and specifications of acoustic fencing to the 3G pitch and any perimeter fencing, shall be submitted to and approved in writing by the local planning authority. The acoustic fencing and any perimeter fencing shall be installed in accordance with the approved details prior to the first use of the 3G pitch and shall be retained thereafter.

Reason: In the interests of amenity.

13. There shall be no use of the Grass Rugby pitch after 21.00hrs and no use of the 3G Pitch after 22.00Hrs.

Reason: In the interests of amenity.

14. Prior to the commencement of development a Construction Management Plan shall be submitted to and approved by the Local Planning Authority. This should contain information on hours of construction and how noise and dust will be controlled so as to avoid annoyance to occupiers of neighbouring properties. Examples of measures to be included are:

- a) Good practice procedures as set out in BS5228:2014,

- b) Best Practicable Means (BPM) as defined in Section 72, of the Control of Pollution Act 1974 (COPA),
- c) Careful location of plant to ensure any potentially noisy plant is kept away from the site boundary as far as possible,
- d) Careful selection of construction plant, ensuring equipment with the minimum power rating possible is used, and that all engine driven equipment is fitted with a suitable silencer,
- e) Regular maintenance of plant and equipment to ensure optimal efficiency and quietness,
- f) Training of construction staff where appropriate to ensure that plant and equipment is used effectively for minimum periods,
- g) If identified as necessary, the use of localised hoarding or enclosures around specific items of plant or machinery to limit noise breakout especially when working close to the boundary.

The Construction Management Plan shall be implemented in accordance with the approved details.

Reason: In the interests of amenity.

15. No development shall commence until details of the design and layout of the 3G pitch have been submitted to and approved in writing by the Local Planning Authority [after consultation with Sport England]. The facility shall not be constructed other than in accordance with the approved details.

Reason: To ensure the development is fit for purpose and sustainable.

16. Use of the 3G pitch shall not commence until:
- (a) certification that the Artificial Grass Pitch hereby permitted has met FIFA Quality Concept for Football Turf – FIFA Quality or equivalent International Artificial Turf Standard (IMS) and
 - (b) confirmation that the facility has been registered on the Football Association's Register of Football Turf Pitches have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development is fit for purpose, sustainable and provides sporting benefits.

17. No development shall commence until the following documents have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England:
- (i) A detailed assessment of ground conditions (including drainage and topography) of the land proposed for the grass playing field which identifies constraints which could adversely affect playing field quality; and
 - (ii) Where the results of the assessment to be carried out pursuant to (i) above identify constraints which could adversely affect playing field quality, a detailed scheme to address any such constraints. The scheme shall include a written specification of the proposed soils structure, proposed drainage, cultivation and other operations associated with grass and sports turf establishment and a programme of implementation.

(a) The approved scheme shall be carried out in full and in accordance with the approved programme of implementation [or other specified time frame – e.g. before first occupation of the educational establishment]. The land shall thereafter be maintained in accordance with the scheme and made available for playing field use in accordance with the scheme.

Reason: To ensure that the playing field is prepared to an adequate standard and is fit for purpose.

18. Prior to commencement of development a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the 3G pitch and retained grass pitch and include details of pricing policy, hours of use, access by local clubs and informal use, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement.

Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport.

19. Prior to commencement of development, the applicant shall submit a construction and phasing plan, which sets out a timetable for the construction and implementation of the sports facilities to be provided on this site.

Reason: To ensure that the facilities are provided within a reasonable timescale, and to ensure that existing users retain access to the facilities.

20. Prior to installation full details of floodlighting for the pitches shall be submitted to and approved in writing by the local planning authority. The floodlighting shall be installed in accordance with the approved details. Floodlights shall be switched off as soon as is reasonably practical following the cessation of use and at the latest no longer than 30 minutes after the permitted hours of use in Condition 13.

Reason: In the interests of amenity.

21. No development shall take place until full details of both hard and soft landscape works have been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting etc); proposed and existing functional services above and below ground (e.g. drainage power, communications cables, pipelines etc indicating lines, manholes, supports etc); retained historic landscape features and proposals for restoration, where relevant. Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed number/densities where appropriate; implementation programme. Landscaping proposals should be based on the Landscape Masterplans.

Reason: To ensure the provision of amenity afforded by appropriate landscape design.

22. All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation of any part of the development or in accordance with the programme agreed with the Local Planning Authority; and any trees or plants which, within a period of five years from completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation; all works shall be carried out in accordance with the relevant provisions of appropriate British Standards or other recognised Codes of Good Practice.

Reason: to ensure that the appearance of the development is satisfactory

23. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA).

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained

24. No development shall commence until details of the implementation, maintenance, and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

25. Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing, and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

26. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the

duration of construction. The approved CSWMP shall include:

Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

- i. Temporary drainage systems
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
- iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

Informatives:

1. Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing. For further information please visit:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/>

2. Informative: The applicant is advised that the design and layout of the [sports facility] should comply with the relevant industry Technical Design Guidance, including guidance published by Sport England, National Governing Bodies for Sport.

Informative (artificial grass pitches – rugby only). The applicant is advised that the pitch should be built in accordance with RFU guidance note 7: Artificial Rugby Turf and tested bi-annually by an accredited testing laboratory in order to achieve and maintain World Rugby Regulation 22.

Informative (artificial grass pitches – football only). The applicant is advised that the pitch should be tested in accordance with The FA standard code of rules and be registered on the FA Register for 3G Football Turf Pitches.

Informative (artificial grass pitches football only) – The applicant is advised that for any football match play to take place the pitch should be built in accordance with

FIFA Quality Concept for Football Turf - FIFA Quality or International Match Standard (IMS) as a minimum.

Informative: Guidance on preparing Community Use Agreements is available from Sport England. <http://www.sportengland.org/planningapplications/> For artificial grass pitches it is recommended that you seek guidance from the Football Association/England Hockey/Rugby Football Union on pitch construction when determining the community use hours the artificial pitch can accommodate.

3. Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991

Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution

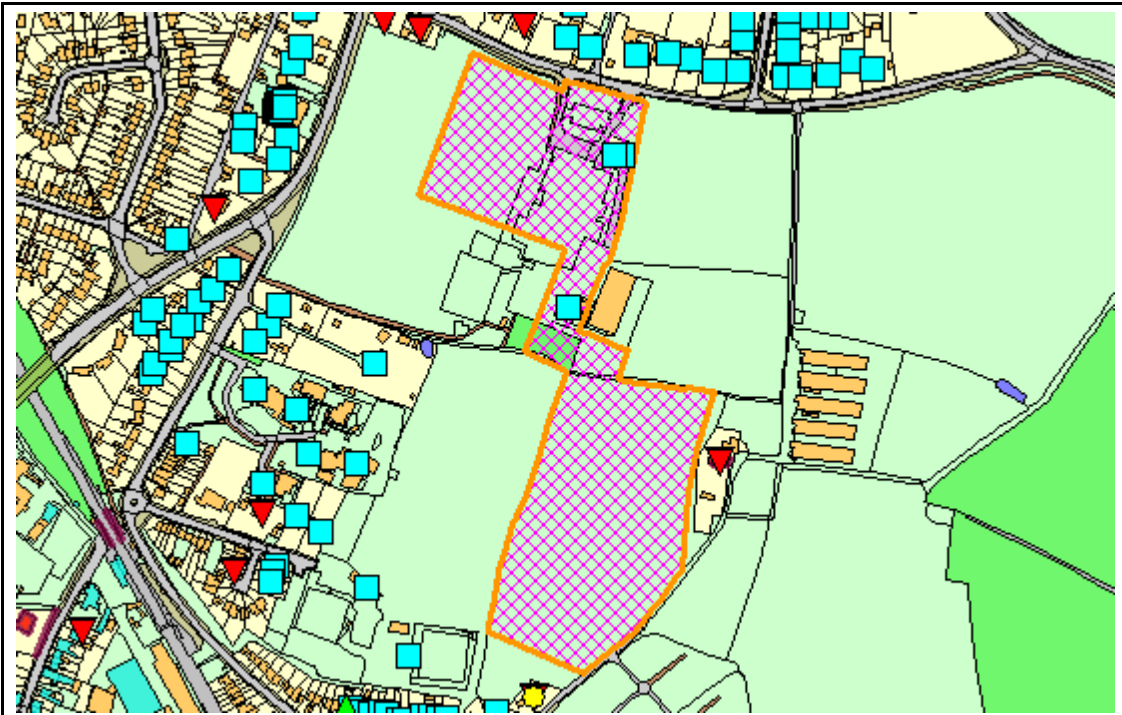
Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act

Any works to a main river may require an environmental permit

Background information

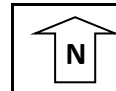
See application reference DC/21/0007/FUL on [Public Access](#)

Map



DO NOT SCALE SLA100019684

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Key



Notified, no comments received



Objection



Representation



Support