

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2020/90640 - Holmfirth High School, Heys Road, Thongsbridge, Holmfirth, HD9 7SE		
Formation of artificial grass pitch with associated features, including eight 15m high floodlights, fencing up to 4.5m, pedestrian circulation and access route, vehicular maintenance and emergency access with Springwood Road, erection of store, grass mounds, retaining structures and landscaping works		
Date Responded: 04 May 2020	Responding Officer: Richard Hume	Responding Ref: WK/202006877
Noise A “Noise Impact Assessment Report” by Acoustic Consultants, dated 10 Jan 2020 (Ref: 8082/DO) has been submitted. The report predicts the noise levels that will occur at nearby noise-sensitive properties by using measurements of noise from sports activities at existing similar sports facilities and compares those levels with measurements of the existing noise levels within the site. It advises that the proposals are for the development to be open for use, including use by the community, from 9:00 until 22:00 Monday to Friday and until 17:00 on Saturday, Sunday and Bank Holidays. The assessment predicts highest noise level at the façade of the nearest noise sensitive property arising from the future use of the AGP will be: • 47dB LAeq (1 hour) • 51dB LAmax(fast) from voices shouting • 65dB LAmax(fast) from referee’s whistle • 64dB LAmax(fast) from ball impacts The assessment advises that the 47dB LAeq (1 hour) will be marginally above the existing ambient levels and is below the recommended upper target criteria of 50dB and therefore it considers this to be acceptable. It also advises that the predicted maximum noise levels are also within acceptable limits. It concludes that noise from the development would potentially be noticeable to nearby residents but not be intrusive and therefore would result in no observable adverse effect. To help effectively control the noise the report makes some recommendations. It recommends that neoprene isolators are located between the perimeter fence panels and their supporting posts to prevent the panels rattling when impacted by balls. It also recommends that a Noise Management Plan is implemented for the proposed use which includes requirements for behaviour standards for users and also a facility for neighbours affected by noise to make complaints direct to the operator. The report is considered to be generally satisfactory but there are some areas of uncertainty. The predicted noise levels for ball impacts appear to be based on measurements at a fence that appears to be around 1m tall. It is unclear whether those measurements will be representative of the noise arising from ball impacts on a 4.5m tall fence as proposed for this development. Our experience with ball impact sounds are that they are often the loudest noise source from sports activity, particularly if the fence panels are fixed in a way that allows them to rattle. It is therefore essential that report’s recommendation for neoprene isolators to		

be located between the panels and the posts is implemented.

Also, the on-site measured noise levels that are detailed in the report were at a single monitoring location approximately midway between the pitch and some of the noise sensitive premises. It is considered that this measurement location does not necessarily accurately reflect the ambient noise levels that exist at the nearby noise sensitive properties.

An assessment using $L_{A,eq}$ (1 hour) noise levels is not particularly relevant for the proposed use. In our experience the highest levels of noise disturbance are caused by regular short durations noises from shouting (including bad language), ball impact sounds and referees' whistles. These will generally become more intrusive as background noise levels reduce such as later in the evening.

It is noted from the submitted plans that 1.2m high mounds are proposed between the pitch and nearby residential properties. These are likely to provide some attenuation of the noise from the use of the pitch and therefore need to be in place prior to the sports use commencing.

The proposals for the artificial grass pitch and floodlighting will allow a significant intensification in the use of the site. The current level of use is limited by the availability of daylight together with when the existing grass pitch is in a suitable condition to use. There are therefore significant concerns regarding the potential increase in noise arising from this development particularly the proposal to operate as late as 22:00 on weekdays when residential properties are little more than 50m away. Conditions regarding controlling noise from the development and its times of use are therefore necessary.

Floodlighting

An LED Floodlighting document by Signify dated 21 Nov 2019 (ref: 400404186) has been submitted with additional information provided in the Design & Access Statement by Labosport dated 11 Feb 2020 (ref: LSUK 19-0273). The proposal is for illuminating the artificial grass pitch with 16 LED luminaires on eight 15m tall columns.

The design levels of illuminance for the pitch are 120 / 200 lux based on football association guidance, and reference is also made to BS EN 12193. The lighting proposals predict that the maintained average illuminance will range from 142 to 237 lux for the whole pitch and 221 lux for when half the pitch is lit, based on a maintenance factor of 0.9. The report indicates, from spillage at ground level and at 1.8m illuminance information, that the proposed lighting will cause illuminance levels of less than 1 lux at nearby residential premises except for 46 Springwood Rd where it predicts it will be 1.38 lux. It is unclear from the information provided, but it is assumed these levels refer to horizontal illuminance. It proposes that the lighting will remain lit for 15 minutes after the pitch use ends, to enable safe egress for users.

There are some concerns regarding the proposed and predicted levels of illuminance. The football association guidance which has been used for the design levels of illuminance is intended for lighting installations for Clubs wishing to compete in FA competitions and in the National League System. The British Standard referred to in the submitted document (BS EN 12193 (2018) Light and Lighting - Sports Lighting) provides different guidance, recommending illuminance levels of 75 lux for a development of this type.

I therefore consider that the proposed illuminance levels are significantly higher than are necessary for the intended future use and therefore unacceptable. A condition requiring revised proposals for the artificial lighting are therefore necessary.

EVCP

The proposals for parking are unclear, the application form advises that there will be no overall increase in the number of parking spaces but the submitted plans show some proposed parking areas for community users of the development which currently appear to be used as sports areas. If additional car parking facilities are provided as part of this development then it is expected that facilities for charging electric vehicles and other ultra-low emission vehicles are provided in accordance with the National Planning Policy Framework and *Air Quality & Emissions Technical Planning Guidance* from the West Yorkshire Low Emissions Strategy Group. A condition requiring charging points is therefore necessary.

Recommended Conditions

Noise Management Plan – Condition

Before the use of the pitch commences, a site-specific noise management plan shall be submitted to and approved in writing by the Local Planning Authority, the plan shall include:

- a) a method of informing users that swearing and anti-social behaviour is unacceptable, and that the operator of the site reserves the right to dismiss users from the pitch and ban their future use.
- b) a facility for neighbours to report excessive noise or anti-social behaviour directly to the operator of the site and that all such complaints be logged and investigated upon receipt, and appropriate action taken promptly, and the complainant kept informed of progress.
- c) A system for training all staff to follow an action plan for dealing with complaints. This would include the ability to warn or ban user groups from the pitches.
- d) a log of complaints which should be retained for at least a period of two years.

The approved noise management plan shall be implemented before the use of the pitch commences and shall be retained thereafter.

Pitch Perimeter fencing fixtures - Condition

The perimeter fencing to the pitch shall be fixed to support posts with a neoprene (or similar) isolator to fully isolate the panels from the posts to eliminate unnecessary noise from the fence panels rattling when impacted by balls.

Hours of Use of Pitch and Floodlighting - Condition

The sports pitch hereby permitted shall not be used for any sports activities outside the hours of:

09:00 to 20:00 Monday to Friday

09:00 17:00 Saturday and Sunday and Bank Holidays and

The floodlighting shall only be operated when the pitch is in use and shall be turned off no later than 15 minutes after the use of the pitch has ended.

Reason: To ensure that the proposed use(s) does not give rise to the loss of amenity to nearby residential properties, by reason of noise or disturbance at unsociable hours, to accord with the aims of Policies LP24 and LP52 of the Kirklees Local Plan and Chapters 12 and 15 of the National Planning Policy Framework.

LC1 External Artificial Lighting - Condition

Before the installation of external artificial lighting commences, a lighting scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme should include the following information:-

- a) The proposed hours of operation of the lighting
- b) The location and specification of all of the luminaires
- c) The proposed design level of maintained average horizontal illuminance for the areas that needs to be illuminated.
- d) The predicted vertical illuminance that will be caused by the proposed lighting when measured at windows of any properties in the vicinity.
- e) The measures that will be taken to minimise or eliminate glare and stray light arising from the use of the lighting that is caused beyond the boundary of the site
- f) The methods of switching and controlling the lighting so that it is only operated at the permitted times and at times when it is required.

The external artificial lighting shall be installed and operated thereafter in accordance with the approved scheme.

Reason: To safeguard the amenities of the occupiers of nearby properties and promote sustainable development in accordance with part 2 and 15 of the NPPF and **xxxxx** of the Local Plan

LF1 Artificial lighting - Footnote

The proposed design levels of illuminance should be shown to be appropriate for the intended use by reference to appropriate guidance. Generally, to minimise problems of glare and stray light from external artificial lighting it should be installed and maintained in accordance with the *"Guidance Notes for the Reduction of Obtrusive Light"* by the Institution of Lighting Professionals: 2011 www.theilp.org.uk. The predicted levels of stray light must not exceed the recommended maximum levels given in Table 2 of this guidance for an Environmental Zone E2.

EVC1 Electric Vehicle Charging Points - Condition

Before any new vehicle parking facilities are brought into use a scheme detailing the dedicated facilities that will be provided for charging electric vehicles and other ultra-low emission vehicles shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall meet at least the following minimum standard for numbers and power output:-

- One Standard Electric Vehicle Charging Point (of a minimum output of 16A/3.5kW) for every 10 parking spaces

Buildings and parking spaces that are to be provided with charging points shall not be brought into use until the charging points are installed and operational. Charging points installed shall be retained thereafter.

Reason: In the interest of supporting and encouraging low emission vehicles, in the interest of air quality enhancement, to comply with the aims and objectives of Policies LP24 and LP51 of the Kirklees Local Plan and Chapters 2, 9 and 15 of the National Planning Policy Framework.

EVF1 Electric Vehicle Charging Points – Footnote

- A Standard electric vehicle charging point is one which is capable of providing a continuous supply of at least 16A (3.5kW). A 32A (7kW) is however more likely to be futureproof
- At non-residential developments, the requirement for one electric vehicle charging point for every 10 parking spaces may initially be reduced to one charging point for every 20 parking spaces with the remainder provided at an agreed trigger point.
- For developments where some or all of the parking is likely to be used for shorter stay parking (30mins to 4 hours) then Fast (7-23kW) or Rapid (43kW+) charging points may be more appropriate. If Fast or Rapid charging points are proposed together with restrictions on the times that vehicles are allowed to be parked at these points then a lower number of charging points may be acceptable.
- The electrical supply of the final installation should allow the charging equipment to operate at full rated capacity.
- The installation must comply with all applicable electrical requirements in force at the time of installation.

Construction Site Working Times - Condition

Noisy construction, demolition and site clearance operations shall not take place outside the hours of:

0800 to 1900 Monday to Friday;

0800 to 1300 on Saturdays

With no noisy activities on Sundays or Public Holidays

Reason: To safeguard the amenities of the occupiers of nearby properties in accordance with part 15 of the NPPF and the Local Plan

Construction Sites working times – Footnote

Kirklees Council has powers under Section 60 of the Control of Pollution Act 1974 to control noise from construction sites and may serve a notice imposing requirements on the way in which construction works are to be carried out. It has additional powers under Sections 80 of the Environmental Protection Act 1990 to prevent statutory nuisance including noise, dust, smoke and artificial light and must serve an abatement notice when it is satisfied that a statutory nuisance exists, or is likely to occur or recur. Failure to comply with a notices served using the above mentioned legislation would be an offence for which the maximum fine on summary conviction is unlimited.