

38 Hitchin Road,
Letchworth Garden City,
Hertfordshire,
SG6 3LX

20-Oct-2025

Reference: Planning Application 25/01830/FP Site: Highfield School, Highfield, Letchworth Garden City, SG6 3QA Proposal: Creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, floodlights and an access footpath.

Dear Sir/Madam,

As the planning process appears to be still open, I wanted to add some final thoughts and a summary before a decision is made.

I believe that the application fails to meet key statutory planning tests, particularly concerning residential amenity, highway safety, and environmental protection. The unique constraints and intensity of the Highfield proposal demonstrate that necessary mitigation cannot be achieved here without causing significant adverse impacts.

Many thanks,

Jonathan Turnbull

Analysis of other pitches and distance to neighbours

I have identified pitches in the area and measured from the nearest residential boundary point to the **nearest point** on the pitch boundary (using Google maps measure function). This has resulted in the following:

- Letchworth Country ground (**34m** from boundary of nearest residence from nearest point on pitch)
- The Arena, Hitchin Town Community Football Club (**50m** from nearest residence - across a railway track)
- Lucas Lane Sports Club (**56m** from nearest residence boundary)
- Creasey Park Community Football Club (**30m** from nearest residence boundary)
- Ware Football Club (**220m** from nearest residence boundary)
- Sports Academy Stevenage (**120m** from nearest residence boundary)

- Stotfold Football Club (**67m** from nearest residence boundary - across a road too)
- Kempston Rovers (**50m** from nearest residence boundary - across a road)
- Flitwick Community Centre (**116m** from nearest residence boundary)
- Lordship Farm primary school (**39m** from nearest residence boundary)

The Highfield application shows that the nearest residential properties are approximately **10m to the south of the proposed AGP.**

I struggle to believe that you will find another pitch which is this close to residences.

Although the National Planning Policy Framework (NPPF) and local planning documents, do not specify an exact minimum separation distance (in metres) required between an artificial pitch (or large development) and neighboring residences, they focus on managing the impact of the development to protect the health and quality of life of residents - which is inherently linked to proximity.

Lack of early engagement

The National Planning Framework states that applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot. It was very disappointing that there was **no engagement** from the school or the company running this process (either before or after the application was submitted). The first that neighbours heard about this was a letter from the local council about this development. *I for one would have welcomed the opportunity to talk to the school in a constructive manner.* This chance was not provided.

Lack of supportive immediate neighbours

There are a total of 57 public comments received. Ensuring that people who have made multiple comments are counted only as one person, please note that **NO people who are immediate neighbours** (i.e. their properties border the school grounds or are 'feeder' streets) support this plan.

There are several comments from people who have listed Highfield School as their address. On Googling, "<NAME> + highfield school", these respondents **appear all to be teachers at the school.**

Outside of people registered at the school, there is only one person who is supportive of this - this person is located elsewhere in Letchworth and not in the immediate vicinity.

Usability of the field

One of the comments stated that 'the current field is unusable for the majority of the year and even when available is not set up for sporting use.' I would draw your attention to a previous planning application (2008) which stated "*Our fields are adequate for providing the facilities we require to teach outdoor Physical Education. With the exception of extreme weather outdoor lessons are rarely disrupted. The sports hall caters for weather extremes.*" Has the ground changed that much between then and now?

In terms of setting the field up for sporting use, I assume it would be far cheaper to buy some goals, nets and have the groundsperson also paint the boundaries than build a brand new artificial pitch.

Green Belt & Appropriateness

Regulations

NPPF Para 153 (Presumption against inappropriate development): "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." Substantial weight is given to any harm to the Green Belt and its openness.
NPPF Para 143 (Purposes of Green Belt): Conflicts with the purpose to "assist in safeguarding the countryside from encroachment".

Key points

- Failure to Preserve Openness Due to Visually Intrusive Structures - The development fails the test in NPPF Paragraph 154(b) (formerly 89) to preserve the openness of the Green Belt because the scale of the permanent structures required for operation is fundamentally intrusive. This imposition conflicts with the Green Belt purpose of assisting in safeguarding the countryside from encroachment and preserving the setting and special character of historic towns (Garden City ethos)
- Conflict with Green Belt Purposes Due to Material Change of Use - The extended operation of the facility transforms the use of the land, conflicting with the fundamental purpose of Green Belt policy to prevent encroachment and preserve character. The proposal represents a "clear change of use from educational to commercial", operating until 20:15 on weekdays and throughout the weekend

Failure to Avoid Significant Adverse Impacts from Noise

The NPPF requires that development must mitigate and reduce noise impacts to a minimum, and critically, avoid noise giving rise to significant adverse impacts on health and the quality of life. I argue that the development will exceed the Significant Observed Adverse Effect Level (SOAEL) due to its proximity.

NPPF Legislation Reference: Paragraph 198(a).

- **Reliance on Misleading Metrics:** The applicant's Noise Impact Assessment (NIA) relies primarily on the hourly average continuous sound level (LAeq, 1 hour), predicting a compliant level of approximately 48 dB in the nearest gardens (below the 50 dB threshold for moderate annoyance). However, I believe this average is misleading because it masks the impact of short, loud events.
- **Exceedance of SOAEL by Transient Noise:** The unmitigated maximum noise levels (LAFmax) from whistles and ball impacts are predicted to be significantly higher: up to 68 dB (LAFmax) for whistles and 64 dB (LAFmax) for ball impacts at the nearest façade. I contend these "sharp, repetitive sounds" exceed the 60-65 dB threshold often associated with the Significant Observed Adverse Effect Level (SOAEL) in quiet residential areas, directly contravening the NPPF's requirement to avoid such impacts.
- **Extended Use During Sensitive Hours:** The proposal allows intense community use until 20:15 on weekday evenings and throughout the weekend. This extends noise, shouting, and general disturbance into the "peak residential relaxation hours", preventing the peaceful enjoyment of homes and gardens, especially during summer months when windows may be open.
- **Unenforceable Mitigation:** The viability of the noise prediction hinges on a 4.0m high acoustic barrier and an unenforceable "no whistle policy" for evening use. I believe the reliance on a reactive Noise Management Plan based on complaints (after the disturbance has occurred) fails the statutory duty to proactively mitigate and reduce noise to a minimum.

Detrimental Impact on Character and Failure to Preserve Openness

The NPPF emphasizes the importance of design that is sympathetic to local character. Development in Green Belt land must maintain openness and not conflict with its purposes. I believe the imposition of large, permanent structures constitutes inappropriate development.

NPPF Legislation Reference: Paragraph 131 (Achieving Well Designed Places) and Paragraph 133 (Green Belt).

- Visually Intrusive Structure: The combination of six 11-metre high floodlighting columns, 4.5m perimeter fencing, and the necessary 4.0m high acoustic barrier fundamentally alters the Green Belt/residential landscape. This creation of an "enclosed and industrial-style 'cage'" is an alien feature inconsistent with the design principles of a Garden City.
- Light Pollution on Local Amenity: The 11m floodlights introduce industrial-level illumination causing "light spill into nearby gardens and homes". The required evening operation until 8:15 PM in the winter months constitutes light intrusion into bedrooms and living spaces, significantly harming local amenity contrary to the requirement to limit the impact of light pollution.
- Material Change of Use to Commercial Operation: The proposal relies on extensive community hiring outside of typical school hours (7 days a week, 52 weeks a year). This constitutes a "clear change of use from educational to commercial", transforming a tranquil school playing field into a commercial leisure facility. This level of intensification and commercial activity conflicts with the residential character of the area.

Unacceptable Risk to Highway Safety and Traffic Congestion

The NPPF requires that development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

NPPF Legislation Reference: Paragraph 191 (preventing unacceptable impacts on highway safety/severe residual cumulative impacts).

- Initial Recommendation for Refusal: The Highway Authority initially recommended that permission be refused for the Highfield application, citing insufficient information to allow a determination to be reached, specifically requesting a comprehensive Transport Statement and robust Travel Plan. This strong stance indicates the severity of the infrastructure capacity concern.
- Creation of Unavoidable Congestion: Highfield Road is described as a "narrow residential road" that already experiences "bedlam" and "gridlock" during short school pick-up/drop-off times. The commercial use proposes traffic flow 7 days a week, with estimated "128 user cars every hour" at change-over periods. This sustained, high-volume flow will exacerbate existing problems.
- Risk to Emergency Access: Due to the narrow, congested roads, the intensified traffic risks blocking access for emergency vehicles, which is cited as a life-threatening risk, especially for the elderly residents in the area. This risk demonstrates a failure to mitigate potential severe residual cumulative impacts.

Non-compliance with Environmental Protection and Biodiversity rules

Planning decisions must contribute to and enhance the natural and local environment by minimising impacts and providing net gains for biodiversity. Furthermore, decisions must ensure new development is appropriate by preventing unacceptable levels of pollution.

NPPF Legislation Reference: Paragraph 198(e) (preventing unacceptable pollution) and Paragraph 198(d) (minimising impacts and providing net gains for biodiversity).

- Failure to Deliver Statutory Biodiversity Net Gain (BNG): The mandatory requirement for 10% Biodiversity Net Gain is not met on site. The calculation indicates a -100.00% Habitat units change, resulting in a significant net loss. The proposal involves replacing a natural, permeable grass field with an artificial, plastic surface, contradicting the NPPF's environmental enhancement objective.
- Risk of Microplastic Pollution: The AGP proposes using SBR rubber crumb infill. This material is identified as a major microplastic pollutant, and the EU has legislated a ban on its use from 2031. The introduction of such material, which can contaminate soil and water, conflicts with the NPPF requirement to prevent "unacceptable levels of... pollution".
- Unmitigated Ecological Impact (Bats): Although a mitigation scheme was proposed, the Phase II Bat Surveys noted that due to lack of space, the pitch could not be moved to achieve the best practice 25-metre buffer between the 0.5 lux lighting contour and the valuable eastern boundary hedgerows. The use of floodlights, even with a curfew, still impacts species categorized as being of conservation significance in England.

Lack of Justification and Conflict with Strategic Needs

The NPPF requires local planning policies to be based on robust assessments of need, and existing playing fields should only be built on if the benefits clearly outweigh the loss.

NPPF Legislation Reference: Paragraph 104 (Playing fields protection/benefits outweighing loss).

- Conflict with Local Strategy: The North Hertfordshire Local Football Facility Plan 2025 primarily identifies a need for full-size (11v11) 3G pitches. The plan explicitly notes that

small-sided 3G pitch provision (as proposed) is already adequately met, and that "No other sites locally in Letchworth were deemed appropriate to meet the shortfall" aside from alternatives like Letchworth Eagles.

- Insufficient Sporting Benefit to Outweigh Loss: Since the application offers small-sided pitches in an already well-served category, it fails to meet the test of providing a benefit of sufficient weight to clearly outweigh the detriment of losing the open space used for general recreation and school use.
- Availability of Alternatives: There are numerous existing, large, floodlit AGPs already available in Letchworth and nearby Hitchin/Baldock that do not impinge on residential amenity. These sites are demonstrably better located regarding parking and residential proximity.