

Barry Ptak
14 Highfield
Letchworth Garden City
Hertfordshire
SG6 3QD

12/08/2025

Ref: Planning Application 25/01830/FP

Creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, floodlights and an access footpath

Dear Sir/Madam,

I am writing to formally object to the planning application 25/01830/FP. As a resident of Highfield, I am deeply concerned about the potential impact this development will have on our local area and community.

Summary

This proposal will generate unavoidable, high-intensity noise at levels exceeding the Significant Observed Adverse Effect Level (SOAEL) especially during peak evening and weekend periods, with no effective mitigation possible. It misrepresents its alignment with strategic local football infrastructure needs and introduces persistent environmental harm. The proposal is inconsistent with both local and national planning policy and should be refused in full.

Key objections are:

1. Unacceptable Noise Impact
2. Light Pollution
3. Misrepresentation of Strategic Need
4. Green Belt Development & Environmental Harm

1. Unacceptable Noise Impact

The applicant's noise assessment claims most residential receptors will experience levels below the 50 dB $L_{Aeq(1hr)}$ threshold for *moderate* annoyance. This is misleading. $L_{Aeq(T)}$ averages noise over time, which masks the impact of short, loud events such as whistles, shouts, and ball impacts. In contrast, $L_{Amax(fast)}$ captures the peak levels of these sharp, quick sounds that are most likely to cause disturbance - especially in quiet residential areas.

This limitation is recognised in [WHO \(1999\)](#), and [Planning Practice Guidance](#), which highlight the importance of considering maximum noise levels (L_{Amax}) and the character of noise in assessing impact.

*Where noise is principally composed of a small number of discrete events,
the additional use of L_{Amax} or SEL is recommended... repetitive high $L_{AF Max}$
events will tend to cause disturbance.¹*

¹ World Health Organization, "Guidelines for community noise" (1999),
<https://www.who.int/publications/i/item/a68672>, accessed 12 August 2025

The applicant's own data reports $L_{Aeq(1hr)}$ levels of 48 dB at the south residential façade, 45 dB at the east residential façade, and 52 dB in eastern gardens. These values are already close to or above the 50 dB threshold commonly associated with moderate annoyance in residential settings. However, these figures underrepresent the true impact. The assessment appears to rely on selectively low whistle noise levels - approximately 10-15 dB lower than manufacturer specifications for commonly used refereeing whistles^{2,3,4,5} - which equates to a perceived loudness difference of 2-3 times. Moreover, the use of $L_{Aeq(1hr)}$ as the primary metric masks the disruptive effect of short, high-intensity bursts of sound typical of football matches, such as whistles, shouts, and ball impacts. These episodic sounds are better captured by $L_{Amax(fast)}$, which more accurately reflects the real-world experience of nearby residents.

Maximum sound levels are far higher than the 50 dB $L_{Aeq(1hr)}$ threshold (even including the proposed mitigations). Using the applicant's own numbers, manufacturer data, and further standard sound attenuation calculations, we see $L_{Amax(fast)}$ figures of approximately:

	South Residential Façade	East Residential Façade	East Residential Gardens
Whistles	75 dB	77 dB	80 dB
Shouts	54 dB	58 dB	61 dB
Ball Impacts	64 dB	64 dB	67 dB

These sharp, repetitive sounds will occur frequently throughout the day, particularly during matches and training sessions. They clearly exceed the 60-65 dB $L_{Amax(fast)}$ threshold often used to define Significant Observed Adverse Effect Level (SOAEL) in the context of *even less frequent* intrusive sounds, such as trains passing.

These loud, repetitive sounds will significantly disrupt residents' ability to relax in their gardens; force residents to close windows; cause stress, startle responses, and behavioural changes; degrade quality of life in a currently quiet area.

The proposed no whistle policy for evenings and non-competitive matches is ineffective. The International Football Association Board (IFAB) standard laws of the game require whistles⁶ for all competitive formats. Referees in competitive 5v5 matches routinely use whistles to manage play. Pitches like these are expected to host competitive sessions 20-30% of the time, concentrated on evening and weekend periods. The loudest events will occur during peak residential hours when residents are most exposed.

These impacts are foreseeable, unmitigated, and unacceptable. They meet the definition of SOAEL under the [Noise Policy Statement for England](#) and contravene:

² FA Referee Match Equipment, "Fox 40 Classic (Black)",

<https://www.farefereematchequipment.com/product/fox-40-classic-black/>, accessed 12 August 2025

³ FA Referee Match Equipment, "Fox 40 Sonik Blast CMG",

<https://www.farefereematchequipment.com/product/fox-40-sonik-blast-cmg/>, accessed 12 August 2025

⁴ FA Referee Match Equipment, "Acme 2000 Tornado",

<https://www.farefereematchequipment.com/product/acme-2000-tornado/>, accessed 12 August 2025

⁵ Acme Specialist Whistles, "Acme Thunderer 660",

<https://www.acmewhistles.co.uk/acme-thunderer-660>, accessed 12 August 2025

⁶ International Football Association Board, "Body Language, Communication and Whistle",

<https://www.theifab.com/laws/latest/guidelines/body-language-communication-and-whistle/#referees>, accessed 12 August 2025

NPPF paragraph 198(a): Conserving and enhancing the natural environment	“avoid noise giving rise to significant adverse impacts on health and the quality of life”
NPPF paragraph 198(b): Conserving and enhancing the natural environment	“identify and protect tranquil areas which have remained relatively undisturbed by noise”
NPPF paragraph 135(c): Achieving well-designed places	“are sympathetic to local character”
Local Plan D3: Protecting Living Conditions	“Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions” “Such harm may arise from ... noise”
Local Plan SP9: Design and Sustainability	“responds positively to its local context” “Design which does not make the most of opportunities to improve the character and quality of an area should be refused.” “As development pressures increase in the District it is important to respect, retain and where possible enhance the existing character of both the urban and rural areas to maintain the quality of the District’s environment.”

In summary, reliance on $L_{Aeq(1hr)}$ masks the real-world experience significantly. The episodic, high-intensity nature of the noise will cause unacceptable harm to residents’ living conditions, does not respect the area’s character, and justifies refusal.

2. Light Pollution

The introduction of powerful floodlights to a dark environment poses significant adverse effects on residential amenity, wildlife and biodiversity, and the character of the conservation area.

While the proposed seasonal and timing restrictions are a step in the right direction, they do not eliminate the significant ecological, residential, and area character impacts of floodlighting. Sensitive species such as bats remain vulnerable during the proposed operating months, and the visual and physiological effects of artificial lighting persist even with early evening shutoff.

Residential Amenity

Evening lighting until 8.15pm still overlaps with peak residential relaxation hours and despite best lighting design efforts introduces intrusive light trespass to gardens, houses, and the night sky above the development affecting amenity and the area’s nighttime character significantly.

Wildlife and Biodiversity

Bats are still active during the proposed lighting period, especially in milder winters. Even low-level LED floodlighting can displace bat activity up to 75 metres away⁷. This displacement occurs even when the light is not perceptible to humans.

⁷ *Global Ecology and Conservation*, Volume 48 (December 2023), “Far-reaching displacement effects of artificial light at night in a North American bat community”,
<https://www.sciencedirect.com/science/article/pii/S2351989423003645>

Artificial lights at night disrupt bats' foraging, commuting, and roosting behaviours. It increases predation risk and energy expenditure, and can lead to habitat abandonment. The Institute of Lighting Professionals and Bat Conservation Trust recommend avoiding lighting near bat foraging corridors, hedgerows, and woodland edges⁸ – features present around the development.

The seasonal and timing restrictions reduce but do not eliminate ecological harm. The proposal still contravenes Local Plan NE4 which requires *protection of, and net gains in*, biodiversity.

Area Character

The visual intrusion of floodlights, even if only used part of the year, alters the rural and historic character of the general area and the designated conservation area.

The proposal contravenes:

Local Plan D3: Protecting Living Conditions	“Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions” “Such harm may arise from ... pollution (including light pollution) and dominance as well as other issues”
Local Plan HE1: Designated Heritage Sites	“Development should preserve or enhance the character and appearance of conservation areas”
Local Plan NE2: Landscape	“Do not cause unacceptable harm to the character and appearance of the surrounding area or the landscape character area in which the site is located”
Local Plan NE4: Biodiversity and Geological Sites	“All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.”
Local Plan SP9: Design and Sustainability	“responds positively to its local context” “Design which does not make the most of opportunities to improve the character and quality of an area should be refused.” “As development pressures increase in the District it is important to respect, retain and where possible enhance the existing character of both the urban and rural areas to maintain the quality of the District’s environment.”

⁸ *Institution of Lighting Professionals*, “Guidance Note 8 Bats and Artificial Lighting”, <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>, accessed 12 August 2025

3. Misrepresentation of Strategic Need

The [North Hertfordshire Local Football Facility Plan 2025](#) clearly identifies a need for one full-size 11v11 3G Football Turf Pitch (FTP) in Letchworth. It specifies potential locations – Letchworth Eagles Football Club or Grange Playing Field – and, if these cannot be progressed, suggests alternative sites in Hitchin. Crucially, the plan states that no other sites in Letchworth were deemed appropriate to meet the shortfall.

Furthermore, the Plan explicitly notes that small-sided 3G pitch provision is already adequately met through existing and planned facilities, and that additional investment in small-sided AGPs is not required. The strategic priority is focused solely on full-size pitches.

Despite this, the proposal attempts to position the development of small-sided (5v5) AGPs as aligned with the Plan. This is misleading and creates a false impression of strategic alignment. The proposal does not address the identified infrastructure gap and instead diverts attention toward facilities that the Plan has already deemed sufficient.

The proposal also claims to address demand identified in [the North Hertfordshire Playing Pitch Strategy](#), but the Strategy clearly states that there is no need for additional facilities at Highfield School.

The proposal states that it complies with [Sport England's Playing Fields Policy and Guidance](#) Policy Exception 5, however, as we've just clarified, it fails the test for "meets an identified local or strategic need, e.g. as set out in a local authority and/or a sports national governing body strategy".

This misrepresents the strategic need and could mislead key decision-makers.

4. Green Belt Development & Environmental Harm

The development is at odds with established local policy with respect to green belt land and protecting green space and conservation areas. By replacing open playing fields and using harmful materials it negatively affects the local character and pollutes green belt land.

It contravenes:

Local Plan NE1	"Planning permission will be granted provided that development: a) Protects, conserves and where possible enhances the strategic green infrastructure network; b) Avoids the loss, fragmentation, severance or negative impact on the function of the strategic green infrastructure network"
Local Plan NE4: Biodiversity and Geological Sites	"All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible."
Local Plan NE5: Protecting Open Space	"Planning permission will only be granted for any proposed loss of open space provided that: a) It can be demonstrated that the open space is surplus to requirements"

Local Plan HE1: Designated Heritage Sites	“Development should preserve or enhance the character and appearance of conservation areas”
Local Plan SP1: Sustainable Development in North Hertfordshire	“create high-quality developments that respect and improve their surroundings” “protect key elements of North Hertfordshire’s environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the water environment)”
Local Plan SP5: Countryside and Greenbelt	“Development in the Green Belt is only permitted where it would not result in inappropriate development or where very special circumstances have been demonstrated”

The development absolutely does not compensate for the loss in open green space, or the negative impact on biodiversity in the slightest and should be refused on these grounds alone. The further addition of pollutants to this environment even with mitigations is not offset by the (already established as unneeded and weak case for) sporting gain to the local community.

Microplastics

The pitch will use SBR rubber crumb infill, a microplastic pollutant identified by Defra as the UK’s largest source of intentionally added microplastics⁹. The EU has legislated a full ban by 2031¹⁰. The NPPF requires developments to “prevent ... unacceptable levels of ... pollution” and “mitigate ... adverse impacts.”

Microplastics, such as those from SBR rubber crumb infill, pose a serious environmental and health risk - especially in areas where children play. These particles can leach harmful chemicals, contaminate soil and water, and enter the food chain. Children are particularly vulnerable due to their developing bodies. Once released, microplastics are nearly impossible to remove and can persist in the environment for decades, accumulating in ecosystems and potentially affecting human health. Their use in school grounds and residential areas is increasingly recognised as incompatible with environmental protection and public health standards.

Even with containment measures, infill loss is inevitable, leading to accumulation in the local environment - especially concerning for green belt school grounds adjoining residential gardens and a conservation area.

⁹ Department for Environment Food & Rural Affairs, “Option Appraisal for Intentionally Added Microplastics - CB04121”, <https://sciencesearch.defra.gov.uk/ProjectDetails?ProjectId=21802>, accessed 12 August 2025

¹⁰ European Commission, “Commission Regulation (EU) 2023/2055 - Restriction of microplastics intentionally added to products”, https://single-market-economy.ec.europa.eu/sectors/chemicals/reach/restrictions/commission-regulation-eu-20232055-restriction-microplastics-intentionally-added-products_en, accessed 12 August 2025

General Misrepresentation

I wish to highlight a trend in this application. The applicant regularly misrepresents the development's alignment with local and national policy and is selective in which guidelines to use to bolster their arguments.

While no outright falsehoods are made, the application's wording is carefully crafted to imply far greater alignment than exists (North Hertfordshire Local Football Facility Plan 2025; Playing Pitch Strategy), or to minimise the apparent impact by concentrating on the most favourable measures (L_{Aeq} vs $L_{Amax(fast)}$). There's nothing in this that invalidates the application, but it raises questions about the picture the applicant is painting.

To illustrate this very clearly: the application references MSGP39 and MSGP40 to convince us of policy support for their development but fails to mention that these policies are from Gateshead Council, not North Hertfordshire. This undermines the credibility of the applicant's policy alignment claims.

Conclusion

This proposal will cause significant adverse noise effects at SOAEL with no effective mitigation, introduce persistent environmental pollution, and fail to meet identified strategic needs identified for Letchworth. The application should be refused in full.

Should you require any further information, please do not hesitate to contact me.

Yours faithfully,
Barry Ptak.