

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

7-Aug-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,

I am writing to formally and strongly object to the above planning application. My property, 38 Hitchin Road, directly adjoins the proposed development site, and my family and I would be severely impacted by this proposal.

Although I recognize that it's not mandatory, I'm disappointed that the school and company running this didn't engage residents at all during this period too - there has clearly been significant expense which has been spent on all the surveys and yet this is the first time that the residents and other stakeholders are allowed to have input.

My objections are based on the following material planning considerations, which I believe render the development unacceptable in this location:

1. Severe Harm to Residential Amenity from Noise and Light Pollution
2. Detrimental Impact on the Character of the Area & Inappropriate Design for a Garden City
3. Harm to Highway Safety
4. Unjustified Loss of School Playing Field and Failure to Consider Superior Alternative Sites
5. Negative Environmental Impact

1. Severe Harm to Residential Amenity (Noise & Light)

Noise: The application proposes use of the facility until 20:00 on weekday evenings, a time when residents expect a peaceful environment. The applicant's own Noise Impact Assessment (NIA) acknowledges the need for mitigation, proposing a 4.0m high acoustic fence along the southern boundary to meet WHO guidelines. However, the predicted noise level of **48 dB LAeq**

(1 hour) at the nearest properties is only marginally below the 50 dB threshold for 'moderate annoyance'. This is an average; it does not reflect the reality of the noise that will be experienced.

The NIA itself predicts maximum noise levels from whistles could reach **68 dB** and ball impacts on fencing could reach **64 dB** (even with mitigation). These are sharp, sudden, and intrusive noises that will destroy the tranquility of our homes and gardens. The suggestion of a "no whistle policy" is unrealistic and unenforceable for competitive matches. Relying on a reactive Noise Management Plan to control anti-social language is an admission that such problems are expected, and it does little to prevent the noise in the first place.

Light Pollution: The proposal includes **six 11-metre-high floodlighting columns**. While the applicant's technical reports claim compliance with lighting standards, these theoretical models do not reflect the visual reality. For residents whose upstairs windows will be level with these light sources, the development will introduce an industrial-level of light intrusion and sky glow into a dark residential area. The assertion that 11m high galvanised steel masts are "discreet" is questionable. This level of illumination is entirely inappropriate when backing directly onto family homes.

2. Detrimental Impact on the Character of the Area

This proposal is fundamentally at odds with the principles of the Garden City. The installation of a 3G pitch, enclosed by **4.5m high green steel mesh fencing** and overlooked by 11m floodlights, creates an enclosed and industrial-style 'cage'. This is an alien feature in a residential landscape, replacing a green, open playing field with a sterile plastic surface and imposing structures. It damages the visual amenity of the area and sets a poor precedent for development within the Garden City estate.

As a resident I am bound by some fairly strict planning rules - and I believe this whole application goes against the ethos of Letchworth. It would also be a change of use from Education to Commercial.

3. Harm to Highway Safety

Highfield Road is already a busy road, and the additional congestion and vehicle movements caused by back-to-back bookings will create a significant risk to highway safety for drivers, cyclists, and pedestrians. These roads are already narrow, not easily accommodating bi-directional traffic.

4. Loss of Playing Field and Availability of Better Sites

This application proposes to build on a grass playing field currently used by the school. While the applicant claims the AGP is an enhancement that meets Sport England's exception E5, it is not a like-for-like replacement. It removes a large, informal open space for pupils and replaces it with a formal, enclosed facility that will be hired out to external groups and likely not be available for pupils out of scheduled sports lessons. The area containing existing hardstanding courts next to the main car park, or land across Briar Patch Lane, would be less disruptive to residents and better located for parking. The applicant appears to have given no serious consideration to these alternative sites.

It should also be noted that there are *many* existing sites in Letchworth, all in better locations - all with artificial pitches! Examples include:

- Hertfordshire FA County Ground
- Letchworth Corner Sports Club
- St Christopher School

Slightly further out, but still nearby:

- North Herts Arena (Baldock)
- Knights Templar School (Baldock)

Note that there are *even more* football/rugby pitches etc. which aren't artificial but are available for use. I coach a Letchworth Eagles U9 team - and the facilities at both the County Ground and the separate Letchworth Eagles Football Club are terrific - and do not impinge on neighbours.

Furthermore, the applicant's assertion of need, based on the Local Football Facility Plan, does not automatically make this specific location appropriate. The "prized resources" for the local community are already here (see above re: other sites) with a thriving ecosystem of local clubs, for both juniors and adults (with existing home grounds). Even if not, strategic need should not override the fundamental planning duty to protect residential amenity and local character.

The Design & Access statement quotes the "Hertfordshire Local Football Facility Plan 2025" as saying that Letchworth (alongside Hitchin and Knebworth) is identified as a prime location for more 3G facilities, to better serve clubs such as Letchworth Eagles FC (which as above, already has fantastic facilities). That is partially correct, it has identified a shortfall of one 11v11 3G pitch in Letchworth. What it neglects to mention is that the report also states that options have been identified - "Potential options include Letchworth Eagles Football Club or Grange Playing Field. If neither site can be progressed, alternate options in Hitchin which are nearby could also be considered. These include; Hitchin Town FC or Hitchin Boys School." I would draw your attention to the last sentence they use "**No other sites locally in Letchworth were deemed appropriate to meet the shortfall**" (source - <https://localplans.footballfoundation.org.uk/local-authorities-index/north-hertfordshire/north-hertfordshire-local-football-facility-plan-2025/#tab-section-3g-football-turf-pitches-ftps>)

5. Negative Environmental Impact

Replacing a natural, permeable grass field with an artificial plastic surface and SBR rubber crumb infill represents a net loss for biodiversity and the natural environment. The applicant's claims of the turf's recyclability are questionable, as studies (search "Transparent Global Model for Operating the Synthetic Turf Industry in a Sustainable and Circular Way" - only 10% recycled in 2020) show that in practice, a very low percentage of these materials are ever recycled. The risk of microplastic and rubber crumb pollution into the surrounding environment from such a large surface area is significant.

Conclusion

The proposed development would cause unacceptable harm to the amenity of myself and my neighbours through excessive noise and light pollution. It is an inappropriate form of development for this residential location and is contrary to the design principles of the Garden City. Finally, the applicant has failed to justify the loss of this playing field when more suitable, less disruptive alternative locations exist on the school site but also within Letchworth.

For all the reasons stated above, the cumulative negative impacts of this proposal are overwhelming. I urge the Council to refuse this application.

Yours faithfully,

Jonathan Turnbull