

<u>No:</u>	BH2024/02499	<u>Ward:</u>	Rottingdean & West Saltdean Ward
<u>App Type:</u>	Full Planning		
<u>Address:</u>	Longhill School Falmer Road Rottingdean Brighton BN2 7FR		
<u>Proposal:</u>	Installation of a new full size synthetic 3G pitch with floodlighting and fencing to replace the existing natural grass area.		
<u>Officer:</u>	Michael Tucker, tel: 292359	<u>Valid Date:</u>	05.11.2024
<u>Con Area:</u>	N/A	<u>Expiry Date:</u>	31.12.2024
<u>Listed Building Grade:</u>	N/A	<u>EOT:</u>	11.04.2025
<u>Agent:</u>	Sports Labs Limited 1 Adam Sqaure Brucefield Industry Park Livingston EH54 9DE		
<u>Applicant:</u>	Longhill School Falmer Road Rottingdean Brighton BN2 7FR		

1. RECOMMENDATION

- 1.1. That the Committee has taken into consideration and agrees with the reasons for the recommendation set out below and resolves to be MINDED TO GRANT planning permission subject to the applicant entering into a Memorandum of Understanding or a decision taken by the Cabinet/Director of Property and Finance of the council to ensure delivery of the Head of Term set out below, and also subject to the following Conditions and Informatives as set out hereunder. :

Head of Term:

Ecology

- A fee for the Council to monitor BNG provision over a 30 year period (fee TBC).

Conditions:

1. The development hereby permitted shall be carried out in accordance with the approved drawings listed below.

Reason: For the avoidance of doubt and in the interests of proper planning.

Plan Type	Reference	Version	Date Received
Location Plan	010		05-Nov-24
Proposed Drawing	050		10-Oct-24
Proposed Drawing	100		21-Nov-24
Proposed Drawing	101		10-Oct-24
Proposed Drawing	200		10-Oct-24
Proposed Drawing	201		10-Oct-24
Proposed Drawing	300		05-Nov-24
Proposed Drawing	301		05-Nov-24
Proposed Drawing	310		05-Nov-24
Proposed Drawing	350		10-Oct-24

Proposed Drawing	400		10-Oct-24
Proposed Drawing	401		10-Oct-24
Proposed Drawing	402		10-Oct-24
Proposed Drawing	403		10-Oct-24
Proposed Drawing	HLS8992	1	17-Mar-25

2. The development hereby permitted shall be commenced before the expiration of three years from the date of this permission.

Reason: To ensure that the Local Planning Authority retains the right to review unimplemented permissions.

3. No development shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include:

- (i) Timescales for the Proposed Development including the forecasted completion date;
- (ii) Details of how the contractors will liaise with local residents to ensure that residents are kept aware of site progress and how any complaints will be dealt with reviewed and recorded (including details of any considerate constructor or similar scheme)
- (iii) Measures to minimise disturbance to neighbours regarding issues such as noise and dust management, vibration, site traffic, and deliveries to and from the site;
- (iv) Measures to prevent mud/dust from tracking onto the highway;
- (v) Details of hours of construction including all associated vehicular movements
- (vi) Details of the construction compound including plant and material storage and manoeuvring areas;
- (vii) A plan showing construction traffic routes

The construction of the development shall be carried out in full compliance with the approved CEMP.

Reason: As this matter is fundamental to the protection of amenity, highway safety and managing waste throughout development works and to comply with policies DM20, DM33 and DM40 of Brighton & Hove City Plan Part 2, policy CP8 of the Brighton & Hove City Plan Part One, and WMP3d of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan 2013 and Supplementary Planning Document 03 Construction and Demolition Waste.

4. No development shall take place until an ecological design strategy (EDS) addressing compensation and enhancement measures for habitats and species and broadly in accordance with the Preliminary Ecological Appraisal (Phlorum, 11/06/24) and Biodiversity Net Gain Assessment (Phlorum, 05/09/25, V2) has been submitted to and approved in writing by the local planning authority. The EDS shall include the following:

- a) purpose and conservation objectives for the proposed works;
- b) review of site potential and constraints;
- c) detailed design(s) and/or working method(s) to achieve stated objectives;
- d) extent and location /area of proposed works on appropriate scale maps and plans;

- e) type and source of materials to be used where appropriate, e.g. native species of local provenance;
- f) timetable for implementation demonstrating that works are aligned with the proposed phasing of development;
- g) persons responsible for implementing the works;
- h) details of initial aftercare and long-term maintenance;
- i) details for monitoring and remedial measures;
- j) details for disposal of any wastes arising from works.

The EDS shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To ensure that any adverse environmental impacts of development activities can be mitigated, compensated and restored and that the proposed design, specification and implementation can demonstrate this, and to contribute to a net gain for biodiversity as required by Section 40 of the Natural Environment and Rural Communities Act 2006, paragraphs 187 and 193 of the National Planning Policy Framework 2024 and Policy DM37 of the City Plan Part 2.

5. A landscape and ecological management plan (LEMP) shall be submitted to, and approved in writing by, the local planning authority prior to the commencement of the development. The LEMP shall be broadly in accordance with the Biodiversity Net Gain Assessment (Phlorum, 05/09/25, V2) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. The content of the LEMP shall include the following:

- a) description and evaluation of features to be managed;
- b) ecological trends and constraints on site that might influence management;
- c) aims and objectives of management;
- d) appropriate management options for achieving aims and objectives;
- e) prescriptions for management actions, together with a plan of management compartments;
- f) preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
- g) details of the body or organisation responsible for implementation of the plan;
- h) ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plans shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

The approved plan will be implemented in accordance with the approved details.

Reason: Biological communities are constantly changing and require positive management to maintain their conservation value. The implementation of a LEMP will ensure the long-term management of habitats, species and other biodiversity features.

6. The development hereby permitted shall not be commenced until confirmation has been provided to the Local Planning Authority for approval in writing:
 - to demonstrate that the proposed drainage strategy offers sufficient treatment to prevent groundwater contamination

- to provide a maintenance schedule for the proposed drainage elements

Reason: As this matter is fundamental to the acceptable delivery of the permission to prevent the increased risk of flooding and to prevent pollution of controlled waters by ensuring the provision of a satisfactory means of surface water disposal and to comply with policies DM42 and DM43 of City Plan Part and CP11 of the Brighton & Hove City Plan Part One.

7. Use of the 3G Artificial Grass Pitch shall not commence until 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 Artificial Grass Pitch, the refurbished cricket nets and the indoor cricket facilities and ancillary facilities including change, toilets and parking and include details of pricing policy, hours of use, access by non-school users, management responsibilities and a mechanism for review. The Agreement will secure peak time access to the 3G pitch for rugby and other priority user groups and access to the cricket nets and indoor facilities for local cricket clubs. 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 facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy CP17 and DM9.

8. All ecological measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (Phlorum, 11/06/24) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. Supplementary to this and in accordance with advice from the Council's Ecologist (27/06/25) the following points shall also be complied with:

- Provided that the grassland within and immediately adjacent to the site is kept regularly mown short i.e. to c. 5cm height or less, up until the commencement of development, its clearance can be undertaken without ecological supervision; and
- Any spoil heaps created onsite during the soil stripping phase should be appropriately fenced and checked daily to avoid them being used by protected species such as badgers.

Reason: To ensure that the measures considered necessary as part of the ecological impact assessment are carried out as specified and that any adverse impacts on protected species from development activities are mitigated and works comply with the Protection of Badgers Act 1992, Wildlife and Countryside Act 1981, as amended and the Conservation of Habitats and Species Regulations 2017, as amended.

9. The development hereby permitted shall not be commenced until samples of all materials to be used in the construction of the external surfaces of the development have been submitted to and approved in writing by the Local Planning Authority, including (where applicable):
 - details of all pitch, hard surfacing and access path materials
 - details of all fencing
 - details of all floodlighting columns

- c) details of the storage container
Development shall be carried out in accordance with the approved details.
Reason: To ensure a satisfactory appearance to the development and to comply with policy CP12 of the Brighton & Hove City Plan Part One and policy DM18 of the Brighton & Hove City Plan Part Two.
10. Prior to first use of the floodlighting hereby approved, the predicted illuminance levels (indicated on drawing HLS8992 Rev 1 received 17/03/2025) shall be tested by a competent person to ensure that they are achieved. Where the predicted levels are met, confirmation shall be demonstrated to the Local Planning Authority for approval in writing. Where predicted levels have not been met, a report shall demonstrate what measures have been taken to reduce the levels to those indicated. The external lighting shall be installed, operated, and maintained in accordance with the approved details and thereafter retained.
Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with policies DM20 and DM40 of the Brighton & Hove City Plan Part Two.
11. Notwithstanding the submitted documents, the development hereby permitted shall not be brought into use until a Noise Management Plan, detailing the measures that will be taken to minimise potential disturbance arising from the development, has been submitted to and approved in writing by the Local Planning Authority.
The development shall thereafter be operated in accordance with the provisions of the approved Noise Management Plan.
Reason: To safeguard the amenities of the occupiers of neighbouring properties and to comply with policies DM20 and DM40 of Brighton & Hove City Plan Part 2.
12. The use of the 3G Artificial Grass Pitch shall not commence until the cricket nets have first been refurbished in accordance with a scheme to be submitted to and approved in writing by the LPA in consultation with Sport England.
Reason: To ensure that the loss of the cricket NTP is adequately mitigated in accordance with Development Plan Policy CP17 and that the facility is fit for purpose.
13. The 3G pitch hereby permitted shall not first be brought into community use until a scheme of Travel Plan measures to promote sustainable transport to and from the site has been submitted to and been approved in writing by the Local Planning Authority. The Scheme should include but not be limited to, the following measures:
a. Providing public transport information to people when they book
b. Promotion of sustainable transport travel for training staff trips including personal travel planning
c. Sustainable transport promotional material being made available to both training staff and customers including cycle, bus routes and timetable brochure and car club information.
Reason: To ensure the promotion of safe, active and sustainable forms of travel and comply with policies DM35 of Brighton & Hove City Plan Part 2, and CP9 of the Brighton & Hove City Plan Part One.
14. Before the 3G pitch is brought into use, a Management and Maintenance Scheme for the facilities including management structure and responsibilities, a maintenance schedule for the 3G pitch and a mechanism for review shall be submitted to and

approved in writing by the Local Planning Authority after consultation with Sport England. The measures shall include the strategy to be put in place to ensure the replacement of the Artificial Grass Pitch within the specified period and for the recycling of the replaced carpet and for maintaining the cricket nets and for their refurbishment / replacement at the end of their operational lifespan. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the use of the 3G pitch

Reason: To ensure that the new facilities are capable of being managed and maintained to deliver facilities that are fit for purpose, sustainable and to ensure sufficient benefit of the development to sport and to accord with Development Plan Policy CP17 and DM9.

15. Within 3 months of the use of the 3G Artificial Grass Pitch commencing:
 - (a) certification that the 3G Artificial Grass Pitch hereby permitted has met FIFA Quality Concept for Football Turf - FIFA Quality or equivalent International Artificial Turf Standard (IMS) and World Rugby Regulation 22 Standard and,
 - (b) confirmation that the facility has been registered on the Football Association's Register of Football Turf Pitches and has received WR Regulation 22 Certification shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development is fit for purpose and sustainable, provides multiple sporting benefits and to accord with Development Plan Policy CP17 and DM9.

16. The 3G pitch shall not be used other than for outdoor sport and play.
Reason: To protect the 3G pitch from damage, to maintain the quality of and secure the safe use of the 3G and to accord with Development Plan Policy CP17 and DM9.

17. The development hereby permitted shall not be used except between the hours of 09:00 and 21:00 on Mondays to Fridays, and except between the hours of 09:00 and 20:00 on Saturdays, Sundays and Bank or Public Holidays.
Reason: To safeguard the amenities of the locality and to comply with policies DM20 and DM40 of Brighton & Hove City Plan Part Two.

18. The floodlighting hereby permitted shall not be in use except between the hours of 09:00 to 21:00 Monday to Friday and 09:00 to 20:00 on Sundays, Bank and Public Holidays.
Reason: To safeguard the amenities of the occupiers of the locality and to protect habitats and species from the development hereby approved and to comply with policies CP10 of the Brighton & Hove City Plan Part One and DM20 of the Brighton & Hove City Plan Part Two, and Supplementary Planning Document SPD11 Nature Conservation and Development

19. The development hereby permitted shall not be first used until a Completion Report, evidencing the habitat enhancements set out in the approved Biodiversity Gain Plan and Habitat Management and Monitoring Plan, has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development delivers biodiversity net gain in accordance with Schedule 7A of the Town and Country Planning Act, Policy DM37 of Brighton & Hove City Plan Part 2, Policy CP10 of the Brighton & Hove City Plan Part One

and Supplementary Planning Document SPD11 Nature Conservation and Development.

20. No development (including any demolition, site clearance or enabling works) shall take place until:
 - (a) A Biodiversity Gain Plan (BGP) has been prepared in broad accordance with the Biodiversity Net Gain Assessment dated September 2025 and prepared by Phlorum; and
 - (b) The BGP has been submitted to and approved in writing by the Local Planning Authority.

Reason: Based on the information available, this permission will require the approval of a Biodiversity Gain Plan by the local planning authority before development is begun [and before each phase of development where development is phased] because none of the statutory exemptions or transitional arrangements are considered to apply. The effect of paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 is that planning permission granted for the development is deemed to have been granted subject to the condition ("the biodiversity condition").

21. No development shall take place until a Habitat Management and Monitoring Plan (HMMP) has been submitted to and approved in writing by the Local Planning Authority. The HMMP shall accord with the approved Biodiversity Gain Plan (BGP) and include:
 - (i) A non-technical summary
 - (ii) The roles and responsibilities of the people or organisations delivering the HMMP
 - (iii) The planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan
 - (iv) The management measures to maintain habitat in accordance with the approved BGP for a period of 30 years from practical completion (unless otherwise agreed) of the development
 - (v) The monitoring methodology and frequency in respect of the created or enhanced habitat
 - (vi) Provision for the identification, agreement and implementation of contingencies and/or remedial actions where the results from monitoring show that the conservation aims and objectives of the HMMP are not being met.

The created/enhanced habitat specified in the approved BGP shall be provided and thereafter managed and maintained in accordance with the approved HMMP. The habitat monitoring shall be submitted to and approved in writing by the Local Planning Authority in accordance with the methodology and frequency specified in the approved Habitat Management and Monitoring Plan.

Reason: To ensure the development delivers biodiversity net gain in accordance with Schedule 7A of the Town and Country Planning Act, Policy DM37 of Brighton & Hove City Plan Part 2, Policy CP10 of the Brighton & Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

Informatics:

1. In accordance with the National Planning Policy Framework and Policy SS1 of the Brighton & Hove City Plan Part One the approach to making a decision on this planning application has been to apply the presumption in favour of sustainable development. The Local Planning Authority seeks to approve planning applications which are for sustainable development where possible.
2. The applicant is advised that pitches to be used for Step 1 and Step 2 level football matches should be built in accordance with FIFA Quality Concept for Football Turf - FIFA Quality Pro and Steps 3 to 6 should be built in accordance with FIFA Quality as a minimum and tested annually as per league rules. The World Rugby Regulation 22 test and certification must be renewed every two years.
3. Guidance on preparing Community Use Agreements is available from Sport England. <http://www.sportengland.org/planningapplications/>
4. The Biodiversity Gain Plan must relate to development for which planning permission is granted, and specify as a minimum the following matters:
 - i) Information about the steps taken or to be taken to minimise the adverse effect of the development on biodiversity,
 - ii) A completed Metric tool calculation
 - iii) The pre-development biodiversity value of the onsite habitat (shown on scaled plans),
 - iv) The post-development biodiversity value of the onsite habitat (shown on scaled plans),
 - v) Any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development,
 - vi) Any biodiversity credits purchased for the development.
 - vii) Any such other matters as the Secretary of State may by regulations specify including the requirements of Article 37 C of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)Commencing development which is subject to the biodiversity gain condition without an approved Biodiversity Gain Plan could result in enforcement action for breach of planning control.

2. SITE LOCATION

- 2.1. The application relates to part of the grass playing field of Longhill School, to the west of Falmer Road. The existing playing field is marked out for multiple sports and is also used for occasional overspill car parking for school events. There are hard surfaced tennis courts on raised ground along the eastern boundary. The main school buildings are to the west of the field, with the nearest residential properties on Rowan Way to the south. The main site access is from The Vale to the north, with a secondary pedestrian access to the south from Rowan Way via a lockable gate.
- 2.2. The site is subject to various land use constraints, including designation as Open Space and as a Nature Improvement Area (NIA). The site is within a Source Protection Zone and is adjacent to an Archaeological Notification Area (ANA). The

boundary of the South Downs National Park (SDNP) lies some 80 metres distant on the opposite side of Falmer Road.

3. RELEVANT HISTORY

- 3.1. There have been various planning applications at Longhill School over the years. Of particular relevance to the current proposal:
 - 3.2. **BH2006/02721** - Construction of a floodlit Synthetic Turf Pitch and associated landscaping. (Revised siting and scheme to that approved under application BH2005/00520/FP). Approved 03/11/2006 (not implemented)
 - 3.3. **BH2005/00520/FP** - Construction of floodlit synthetic turf pitch with associated landscaping. Approved 12/08/2005

4. APPLICATION DESCRIPTION

- 4.1. Planning permission is sought for the installation of a new full size synthetic 3G sports pitch, with floodlighting and fencing around the pitch perimeter.
- 4.2. The proposed pitch would be located in the centre of the marked-out athletics track and would have dimensions of approximately 91m by 67m, with a sand and rubber crumb artificial surface that would be suitable for sports including football and rugby. There would be asphalted areas at the goal ends and along the western boundary, with a link across the athletics track. The existing cricket non-turf pitch (NTP) in the centre of the field would be removed.
- 4.3. In addition to usual school use, the proposed pitch is intended to also be available to non-school users such as community sports teams.
- 4.4. The proposed floodlighting would comprise six columns each of 15m height. The proposed fencing would rise to 4.5m in height.
- 4.5. The application has been subject to amendments to reduce the proposed hours of use and improve the proposed floodlighting design, discussed in more detail later in this report.

5. REPRESENTATIONS

- 5.1. **Ninety-eight (98)** letters of objection have been received from individuals and from organisations including Chris Wood Acoustics and the Ovingdean Residents and Preservation Society, summarised as follows:
 - Harm to neighbouring amenity due to increased noise disturbance & light pollution
 - Neighbours are already affected by activity on the school field
 - Topography of surrounding area increases noise impact
 - Excessive proposed hours of use of pitch & floodlighting

- Noise mitigations difficult to enforce
- Multiple shortcomings in the submitted Noise Impact Assessment
- Loss of views over the downs
- The gate from Eley Drive should remain locked
- Applicant has not involved local residents
- Loss of residential property values
- Loss of green space for school which is important for children
- Unclear if 3G pitch would be available during break times
- It is costly for the school to install and maintain a 3G pitch
- Not needed as other 3G pitches are available nearby and school has managed without until now
- Motivated by profit rather than by consideration of students
- Proposed pitch is of an inappropriate size
- Poor design, harm to setting of the South Downs National Park
- Inappropriate floodlight specification, upwards light spill into the South Downs National Park
- Additional traffic, not enough parking on site, overspill parking on Eley Drive should be avoided
- Loss of space for overspill parking on the field
- Rubber infill is not sustainable and has been banned in the EU
- Rubber surface has a higher risk of injury & holds more heat during summer
- Loss of biodiversity, harm to ecosystems from floodlighting and microplastic infiltration
- Increased flood risk and surface drainage problems
- Previous schemes refused
- Those in support likely do not live nearby

5.2. **One hundred and twenty-six (126)** letters of support have been received, summarised as follows:

- Community Benefit, improved facilities for school and community use including young people and women's and girls' participation in sports
- Supports Council objectives to increase participation in physical activity
- Similar projects elsewhere have had positive impacts on communities
- Existing natural turf pitches vulnerable to poor weather and poorly lit
- Lack of existing sports facilities in the area
- Source of revenue for school
- Accessible location
- Impact on neighbours mitigated: modern floodlights have effective light containment
- Some noise is to be expected living next to a school and impact over existing situation would not be significant
- Biodiversity gain welcomed

5.3. **Councillor Fishleigh** has objected to the proposal.

5.4. **Councillor Allen** and **Councillor Goddard** have separately written to support the application.

- 5.5. The Councillors' representations are appended to this Committee report.
- 5.6. Full details of all representations received can be found online on the planning register.

6. CONSULTATIONS

Internal:

- 6.1. **Arboriculture:** No comment received
 - 6.2. **Environmental Health:** No objection
Updated and additional floodlighting details and noise assessments have been received. Whistle use is proposed to be restricted after 7pm. Specific construction materials are proposed to be integrated into the design to mitigate impact sounds and there is a robust mitigation plan to further reduce the impact on amenity. Reduced hours of use until 9pm on weekdays and 8pm on weekends are suggested.
 - 6.3. **Sports Facilities:** No objection
The proposal improves the provision of sports facilities in the city and the opportunity for engagement in sport and physical activity for school pupils, local clubs and residents.
 - 6.4. **Sustainable Drainage:** No objection
The proposed drainage system is for all surface water to be infiltrated via a new soakaway. It is proposed to be captured by permeable paving (for paths) or pitch surfaces and attenuated by a stone sub-base. InfoDrainage calculations have been submitted, showing that the proposed drainage system is sufficient for a 1 in 100 year+40%CC design storm.
 - 6.5. Details of maintenance and management for each drainage element, and confirmation that the proposed strategy offers sufficient treatment to prevent groundwater contamination, should be secured by condition.
 - 6.6. **Sustainable Transport:** No objection
Conditions should be attached to secure a car park layout plan, a construction environmental management plan and an updated school travel plan and a package of travel plan measures.
 - 6.7. **Tourism & Leisure:** No comment received
- External:
- 6.8. **Brighton & Hove Archaeological Society:** No objection
The County Archaeologist should be consulted.
 - 6.9. **County Archaeology:** No comment
 - 6.10. **Ecology:** No objection
No objection to the loss of habitat on the existing school field, and there are unlikely to be any significant ecological impacts on any designated sites. There is however

growing recognition that 3G pitches are a significant source of microplastic pollution. The proposed containment measures are welcomed but are unlikely to fully address the issue.

- 6.11. An Ecological Design Strategy and a Landscape and Ecological Management Plan should be secured by condition.
- 6.12. Updated BNG assessments have been provided and demonstrate that a net gain of 21.24% is to be achieved through habitat creation and enhancement. As this is outside of the application red line, it should be secured by way of a legal agreement and added to the national Biodiversity Gain Sites Register to avoid double-counting.
- 6.13. **Rottingdean Parish Council: No objection**
Request for conditions to manage hours of use, noise and light pollution and ensure the south gate is closed from 6pm.
- 6.14. **South Downs National Park Authority:**
If minded to approve the application, the SDNPA recommend that full details of the proposed flood lighting are secured by an appropriate planning condition with the intention of limiting light pollution and disturbance to wildlife.
- 6.15. **Southern Water: No objection**
Standing advice relating to existing assets, soakaways and adoption of drainage systems.
- 6.16. **Sport England: No objection**
Following receipt of additional information and justification, Sport England was able to withdraw its initial objection to the proposals, subject to securing compliance with FIFA and World Rugby pitch standards, a management and maintenance plan, refurbishment of the school cricket nets and a Community Use Agreement by condition.
- 6.17. In subsequent comments (received 20th January 2026) Sport England noted that the draft Travel Plan (received November 2025) identified parking for up to 90 vehicles on the school playing field outside of the proposed 3G pitch.
- 6.18. Sport England requires that use of the field for car parking is limited to:
 - The four events referred to in the Plan being one school open evening in September/ October and 3 x SAMA grading days in February, June and November.
 - The plan to be amended to recognise the presence of the cricket nets and to retain access to them at all times
 - Parking to avoid the athletics track wherever possible in the summer season and the site to be surveyed and any repairs made immediately following its use for parking
 - The playing field not to be used for parking in very wet conditions
 - The parking not to be used during school core hours
- 6.19. Sport England also seek an additional condition to be attached to any grant of planning permission to require a parking management scheme for the field to ensure

that the use of the field for this purpose does not adversely impact on its availability or quality.

6.20. **Sussex Police Community Safety:** No objection

Reasonable hours of use should be secured by condition.

7. MATERIAL CONSIDERATIONS

7.1. In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, this decision has been taken having regard to the policies and proposals in the National Planning Policy Framework, the Development Plan, and all other material planning considerations identified in the "Considerations and Assessment" section of the report

7.2. The development plan is:

- Brighton & Hove City Plan Part One (adopted March 2016);
- Brighton & Hove City Plan Part Two (adopted October 2022);
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (adopted February 2013, revised October 2024);
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (adopted February 2017);
- Shoreham Harbour Joint Area Action Plan (adopted October 2019).
- Rottingdean Neighbourhood Plan

8. POLICIES

The National Planning Policy Framework (NPPF)

Brighton & Hove City Plan Part One

- | | |
|------|--|
| SS1 | Presumption in Favour of Sustainable Development |
| SA5 | The Setting of the South Downs National Park |
| CP9 | Sustainable transport |
| CP10 | Biodiversity |
| CP11 | Flood risk |
| CP12 | Urban design |
| CP16 | Open space |
| CP17 | Sports provision |
| CP18 | Healthy city |

Brighton & Hove City Plan Part Two

- | | |
|------|--|
| DM9 | Community Facilities |
| DM18 | High quality design and places |
| DM20 | Protection of Amenity |
| DM33 | Safe, Sustainable and Active Travel |
| DM36 | Parking and servicing |
| DM37 | Green Infrastructure and Nature Conservation |
| DM40 | Protection of the Environment and Health |
| DM43 | Sustainable Drainage |

Supplementary Planning Documents:

SPD03	Construction & Demolition Waste
SPD06	Trees & Development Sites
SPD09	Architectural Features
SPD11	Nature Conservation & Development
SPD12	Design Guide for Extensions and Alterations
SPD14	Parking Standards
SPD17	Urban Design Framework

Rottingdean Neighbourhood Plan:

S1	Spatial Framework
GOS2	Amenity Open Spaces
GOS3	Wildlife and biodiversity
H2	Design
CF1	Provision of Community Facilities

9. CONSIDERATIONS & ASSESSMENT

- 9.1. The main considerations in the determination of this application relate to the principle of the development, the visual impact of the proposals and the impact on the setting of the South Downs National Park, the impact on neighbouring amenity, sustainable transport matters, drainage and flood risk, and ecology and biodiversity net gain.

Principle of Development:

- 9.2. The proposal is for the creation of an all-weather, floodlit 3G sports pitch on an area of playing field at Longhill School. It is noted that the proposal is very similar in principle to a scheme approved previously under BH2006/02721, although this does not appear to have been implemented and is assumed to no longer be extant.
- 9.3. Policy CP17 of the City Plan Part One seeks the enhancement and more effective use of existing sports facilities and supports the provision of new sports facilities (including extensions to existing provision), particularly where they meet an identified need.
- 9.4. Policy CP18 of the City Plan Part One aims, *inter alia*, to promote healthier lifestyles through encouraging development that promotes active living.
- 9.5. Policy DM9 of the City Plan Part Two supports new community facilities, subject to the following criteria being met:
- the proposed use is compatible with adjoining and nearby uses;
 - the site is close to the community it serves and is readily accessible by walking, cycling and public transport; and
 - where feasible and appropriate, community facilities have been co-located to maximise their accessibility to residents and reduce the need for travel (for example at Community Hubs).

- 9.6. The proposal is considered to accord with the aims and objectives of Policies CP17 and CP18 of the City Plan Part One. The proposed 3G pitch would be an enhancement of the quality of sports facilities available at the school as the artificial surface would be useable in periods of inclement weather and the floodlighting would enable use during darker/winter afternoons and evenings.
- 9.7. It is considered that there is an identified need for the proposed facility. One of the key priorities of the Council's Sports Facilities Plan (currently under review) was to increase levels of community access to existing schools' facilities and to improve the quality and quantity of artificial grass pitches.
- 9.8. The proposed pitch would be located in the centre of the field, and it is recognised that in some respects the proposal is less flexible for use than the existing natural turf, as the changes in surface material and the boundary fencing result in a greater delineation of the overall field. An existing cricket NTP would also have to be removed to make way for the pitch and this formed part of the basis for Sport England's original objection to the proposals.
- 9.9. However, during the course of the application, updated and additional information has been provided to demonstrate that the proposed 3G pitch provides a suitable surface for multiple sports, and that there remains sufficient space on the remainder of the playing fields (which includes land to the north of The Vale) to not displace other users. The existing marked athletics track would be retained, surrounding the proposed pitch, and the existing cricket nets to the northeast of the site would be refurbished and upgraded. This is considered acceptable mitigation for the loss of the cricket NTP and Sport England have withdrawn their initial objection, subject to conditions. The additional representation from Sport England regarding overspill parking on the retained area of field is noted. Whilst it is acknowledged that the athletics track would be obstructed in these instances, this is comparable to the impact of the current use of the field for occasional overspill parking, which has been ongoing for many years. A condition precluding all use of the retained playing field for parking, as requested by Sport England, is not considered appropriate as there is some benefit in allowing occasional overspill parking demand to be accommodated on site and not diverted onto surrounding streets. At the same time, it is recognised that there are concerns regarding potential overly regular use of the field for car parking. An appropriate way forwards is considered to be to secure an updated School Travel Plan by condition to set out the frequency of these events and include any necessary stewarding measures.
- 9.10. The proposed 3G pitch is also intended to be made available for use by external (non-school) sports teams. This is welcomed in principle, subject to careful management of amenity impacts, and it is considered that the criteria of Policy DM9 are met, with the proposal compatible with adjoining uses, co-located with existing sports facility provision at Longhill Sports Centre (within the grounds of the school), and accessible by various modes of transport. A Community Use Agreement can be secured by condition.
- 9.11. No conflict with neighbourhood plan policies including CF1 and GOS2 & 3 has been identified.

- 9.12. Notwithstanding their many benefits, it is acknowledged that there are drawbacks to 3G sports pitches. The pitches have a limited lifespan and are costly to install and maintain. There can be a significant environmental impact arising from the quantity of material needed for the playing surface, and from the potential for the crumb surface material to escape into the local ecosystem. It is noted that the European Union has placed restrictions on new rubber crumb playing pitches, although these do not come into force for several years, and at the current time there are no such restrictions in force, or planned to come into force, in England at either the national level or local level. Sport England's latest (June 2025) position statement on 3G pitches is to explore sustainable alternatives to rubber as a pitch surface, to improve recycling capacity, and to encourage the use of containment measures whilst further research is undertaken.
- 9.13. The proposed 3G pitch would utilise a typical sand and rubber crumb (SBR) surface but would include infill containment measures such as barriers to the lower parts of the boundary fencing, and 'detox' areas at the access gates. The detox areas would comprise a 1m-deep area rubber mesh to collect SBR granules attached to player clothing/footwear.
- 9.14. The school playing fields are designated 'Open Space' of the School Grounds and Sports Pitches typology, and accordingly are protected under Policy CP16 of the Brighton and Hove City Plan Part One. In this case, given the nature of the development it is considered that there would not be any material loss of Open Space. The site would remain of an open character and would continue as part of the school grounds as a sports pitch.
- 9.15. Overall and on balance, it is considered that the benefits arising from the development, taken together with the proposed infill containment measures, are sufficient to enable the proposal to be supported in principle.

Design and Appearance:

- 9.16. The proposed 3G pitch would have dimensions of approximately 97m by 61m. The playing surface would be green, with painted markings in contrasting colours. The boundary fencing would be of an open-mesh design and up to 4.5m in height, finished in RAL6005 Moss Green to blend in with the grass and vegetation background. There would be areas of asphalt at the goal ends and along the western boundary for goal overruns and spectator areas/access control, with a link across the athletics track. There would be a storage container of 6m x 2.5m x 2.5m to the western side for secure storage of equipment.
- 9.17. The proposed floodlighting would comprise six columns each of 15m in height, with a luminaire fixed at the top.
- 9.18. The proposed pitch would be located in the centre of the established school playing fields and, whilst the proposed additions would be prominent within the site, they would not be incongruous additions in this context. The fencing would be lightweight and visually permeable, and the proposed colour palette would be appropriately muted in tone to minimise the visual impact of the development against the backdrops of school buildings and boundary planting. The floodlights would have

slender columns. Subject to securing final details of material finishes by condition, no material harm in terms of appearance is anticipated, and no conflict with Policy CP12 of the Brighton and Hove City Plan Part One or Policy DM18 of the Brighton and Hove City Plan Part Two is identified.

Setting of the South Downs National Park:

- 9.19. It is considered that the visual impact of the development on the setting of the South Downs National Park would be acceptable, for the reasons set out above. The use of the site would remain as part of the school playing fields and this is also considered not to result in an unacceptable impact on the setting of the South Downs National Park.
- 9.20. In terms of dark skies, the original floodlighting proposal was designed to an E3 (suburban) standard (using the Institute of Lighting Professionals *Guidance on the reduction of obtrusive light*). However, this was considered unacceptable and the proposals have now been designed to the more stringent E1 (natural) standard. This is considered acceptable in the context of the South Downs National Park Dark Sky Reserve, with the area of the SDNP closest to the site designated as an E1b 'transition zone' within the lighting technical guidance prepared by the South Downs National Park Authority. The hours of use of the floodlights would be controlled by the recommended conditions. Accordingly, the potential impact on the setting of the South Downs National Park in terms of light spill is considered to be acceptable. No conflict with Policy SA5 of the Brighton and Hove City Plan Part One is identified.

Impact on Amenity:

- 9.21. Policy DM20 of the Brighton and Hove City Plan Part Two states that planning permission for any development or change of use will not be granted where it would cause material nuisance and loss of amenity to the proposed, existing and/or adjacent users, residents, occupiers or where it is liable to be detrimental to human health.
- 9.22. The nearest sensitive uses to the proposed 3G pitch are residential dwellings on Rowan Way and Eley Drive to the south, within 15m of the existing playing field at the closest points. The southern boundary of the field is down an embankment, but some neighbouring dwellings, including nos. 66 and 64 Rowan Way, are nevertheless located on higher ground than the playing field. Other near neighbours are on Wanderdown Way / Wanderdown Drive to the western side of the school buildings, and on The Vale to the north, however these dwellings are at more significant distance (100m or more).
- 9.23. The proposed 3G pitch would be located in the centre of the existing school playing field, with a separation distance of approximately 50m at the closest point to the southern neighbours. This is moderately closer than the area currently marked out for football but is still well within the bounds of the overall playing field and within the perimeter set by the athletics track. It is noted that the existing tennis courts on the eastern boundary of the site are closer to neighbours. The positioning of the proposed 3G pitch within the field is therefore considered not to be uncomfortably or unreasonably close to neighbouring dwellings.

- 9.24. The proposal would not change the character of the use of the space, which would remain as an area for student play and for outdoor sporting activities. However, due to the artificial surface and floodlighting the proposal would have the potential to result in more intensive and prolonged activity than is currently possible on the existing natural turf field.
- 9.25. A more stringent floodlighting scheme has been sought during the course of the application and now includes a contour illumination map identifying a light spill of 5 lux within the southern boundary of the athletics track, which is well within the boundary of the site. The luminous intensity is indicated at the nearest neighbours to be within E1 zone ILP guidance and hours of use of the floodlights (to align with the hours of use of the pitch as below) can be secured by condition. It is considered that there would not be a significant harmful impact on neighbouring amenity in terms of light intrusion, subject to securing verification of the performance of the floodlighting by condition.
- 9.26. The hours of use of the 3G pitch are, as amended, proposed to be between 09:00 - 21:00 on weekdays and 09:00 - 20:00 on weekends. Although reduced compared to the original submission (initially proposed to start at 08.00 daily and cease at 22:00 on weekdays), this is still a significant increase, particularly in the winter months when limited daylight would entail use of the existing pitch ceasing several hours earlier than is proposed.
- 9.27. The proposals include noise mitigation built into the design such as the use of solid construction rebound boards and noise dampers on fencing to reduce rattling from ball impacts. The application was also accompanied by a Noise Impact Assessment (NIA) which concluded that, subject to mitigation measures and in the context of the existing sports field, the proposal would comply with relevant noise criteria including Sport England's *Artificial Grass Pitch Acoustics - Planning Implications* and World Health Organisation *Guidelines for Community Noise*.
- 9.28. Following initial comments from the Environmental Protection team, an addendum to the NIA was submitted. The addendum included more detailed modelling to account for local topography (as noise levels can increase if the receptor height is greater than the source height), a noise contour map and a noise management plan. The noise contour map demonstrated that predicted noise levels (equalised over one-hour periods) would comply with the 50dB limit set by the Sport England guidance at neighbouring facades and gardens. The noise management plan includes measures such as controlled access, supervision, a maximum capacity, controls on whistle use, a complaints procedure and enforcement measures for user non-compliance.
- 9.29. The addendum has been reviewed by the Environmental Protection team who have no objection to the proposals on noise grounds, subject to the recommended conditions.
- 9.30. The representations, including from Chris Wood Acoustics, are noted. The noise impact assessment addendum uses updated methodology that is considered to more closely follow established best practice and the Environmental Protection team are satisfied with the submitted document as outlined above.

- 9.31. It is recognised that whilst the Sport England noise guidance has been demonstrated to have been met, it does not follow that noise from the proposed pitch would be imperceptible from neighbouring dwellings. The Sport England 50dB guidance is an equalised noise criterion, meaning it is averaged over a period of time, in this case 1 hour. Accordingly, this must be treated with some caution as the character of the use of a sports pitch is one of shorter, louder sounds such as shouts, whistles and ball impacts which are likely to exceed 50dB when taken in isolation. However, it is also recognised that the Sport England noise guidance was designed specifically for assessing sports pitches and will have accounted for the character of the noise within the criteria it sets. The averaged period of one hour corresponds to a typical session of use of a 3G sports pitch.
- 9.32. In this case it is considered that there would be some increase in noise, and the hours in which noise occurs, for the near neighbours. However, in view of the existing active use of the playing field, the separation distance, the noise mitigation measures that are included within the design of the scheme and that can be secured by condition in a full noise management plan, and the overall compliance with established best practice guidance, it is considered that the impact on neighbouring amenity in terms of noise can be appropriately mitigated and would not be so significant as to outweigh the wider benefits of the scheme as identified previously.

Sustainable Transport:

- 9.33. It is not anticipated that the proposed floodlighting would significantly affect traffic on Falmer Road / The Vale as the light spill is well contained within the site.
- 9.34. The proposals would primarily be an enhancement of the facilities available at the school and is not a standalone sports facility. It would therefore not be appropriate to rigidly apply the parking standards within SPD14. However, the proposal may result in additional trip generation due to the intended community use of the facility. This would be outside of school hours and the school has an existing car park of circa 75 spaces. The comments of the Local Highways Authority (LHA) are noted, and it is not clear how many of these spaces would be available to community users of the pitch. However, it is not considered reasonable or necessary to secure a reconfiguration of the school car park as part of this application. It is however considered necessary to secure a package of travel plan measures to encourage sustainable travel for users of the proposed pitch and minimise the risk of overspill parking onto local streets.
- 9.35. The existing school travel plan is some years old and is out of date in many respects. As set out previously, it is considered necessary to secure by condition an update/addendum to this travel plan including but not solely so as to account for the change in the area available for occasional overspill parking on the retained area of playing field. The updated Travel Plan would then operate in tandem with the package of travel plan measures being secured for the non-school use of the 3G pitch.
- 9.36. A Construction Environmental Management Plan (CEMP) can be secured by condition to minimise disruption to the highway network during construction of the 3G pitch.

Drainage and Flood Risk:

- 9.37. Parts of the site are indicated to be at a high risk of surface water flooding. The submitted Drainage Strategy is for surface water flooding to be captured by the permeable pitch surface and paving and infiltrated via a soakaway.
- 9.38. The strategy has been reviewed by the Council's flood risk officers and no objection has been raised, subject to the recommended conditions securing detail of treatments to prevent groundwater contamination. The proposed development is not expected to increase flood risk on site or elsewhere and will add attenuation that may reduce the risk of flooding. The site's topography also makes it unlikely for any exceedance flows to cause flooding off site.

Ecology & Biodiversity Net Gain

- 9.39. The existing habitat to be lost as part of the development was assessed in the submitted Preliminary Ecological Appraisal (PEA) and identified as closely managed modified grassland. This habitat is of relatively limited biodiversity value and no objection was raised to its loss by the County Ecologist.
- 9.40. The submission includes a Biodiversity Net Gain (BNG) assessment calculating that a net gain of 21.24% can be achieved through the planting of 20 new oak trees and the enhancement of circa 1.3 hectares of grassland from 'poor' to 'moderate' condition.
- 9.41. The BNG proposals have been reviewed by the County Ecologist who has raised no objection to the principle of what is proposed. It is noted that the land to be used for BNG is outside of the application site red line and is therefore technically offsite. However, the BNG relates to adjoining land that is within the school grounds and under the applicant's control. The proposals do not relate to 'priority' habitats, but will require delivery and monitoring. The development would be subject to the 'deemed' Biodiversity Gain Plan condition and an Ecological Design Strategy (EDS) and Landscape and Ecological Management Plan (LEMP) would be secured by condition to ensure enforceability.

10. PLANNING OBLIGATIONS

- 10.1. In order to appropriately mitigate the impacts of the development and to comply with planning policy, the council's Developer Contributions Technical Guidance and BNG legislation, monitoring and payment of associated fees for BNG need to be secured.
- 10.2. As the applicant in this case is the Council itself, it is not possible for the Council to enter into a section 106 agreement with itself to secure such measures. Section 106 of the Town and Country Planning Act 1990 provides for any person interested in land to enter into a planning obligation with the local planning authority, enforceable as a deed executed between the parties. However, as both the applicant and the enforcing authority would be the Council, the statutory mechanism for a section 106 agreement cannot operate in its usual form.

- 10.3. In these circumstances, it is proposed that a Memorandum of Understanding (MoU) be entered into, or alternatively a decision is taken by the Cabinet/Director Property and Finance, which will secure the mitigation measures that would ordinarily be achieved by a s106 agreement. While such a Memorandum/Decision does not have the status of a planning obligation under s106 and cannot run with the land, it represents a clear and public commitment by the Council, in its capacity as applicant, to provide the necessary mitigation. The MoU/record of decision of Cabinet/Director will be appended to the planning permission and will specify the measures and delivery mechanisms to ensure that the development is carried out in accordance with the agreed mitigation, as would be the case with a s106 agreement. This approach, while not conferring the same statutory enforceability as a section 106 agreement, reflects good practice where the Council is both applicant and local planning authority.
- 10.4. The MoU/Decision will set out also that in the event the land with the benefit of planning permission resulting from this or any subsequent application is to be sold by the Council to a third party, the Council as landowner/seller will require any future purchaser to enter into an appropriate s106 agreement (or a covenant/unilateral undertaking) with the Council as local planning authority, to secure the required mitigation measures

11. CONCLUSION

- 11.1. The proposal would enhance the sporting facilities available to the school and also provide wider community benefits, subject to a Community Use Agreement, in accordance with Policies CP17 of the Brighton and Hove City Plan Part One and DM9 of the Brighton and Hove City Plan Part Two. The design and appearance of the proposals are considered acceptable, as is the impact on the setting of the South Downs National Park and the transport and flooding/drainage implications of the scheme.
- 11.2. The potential impact on the amenity of nearby neighbours is acknowledged, as the proposed artificial surface and floodlighting would allow for more intensive and prolonged use than the existing turf playing field. However, the proposal incorporates suitable noise mitigation within its design and further mitigation can be secured by condition.
- 11.3. The sustainability and environmental impacts of 3G pitches are also acknowledged. However, there is currently no national or local policy in opposition to such facilities.
- 11.4. Accordingly, overall and on balance it is considered that the proposed development is acceptable subject to the recommended conditions.

12. EQUALITIES

- 12.1. Section 149(1) of the Equality Act 2010 provides:
 - 1) A public authority must, in the exercise of its functions, have due regard to the need to—

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 12.2. Officers considered the information provided by the applicant, together with the responses from consultees (and any representations made by third parties) and determined that the proposal would not give rise to unacceptable material impact on individuals or identifiable groups with protected characteristics.