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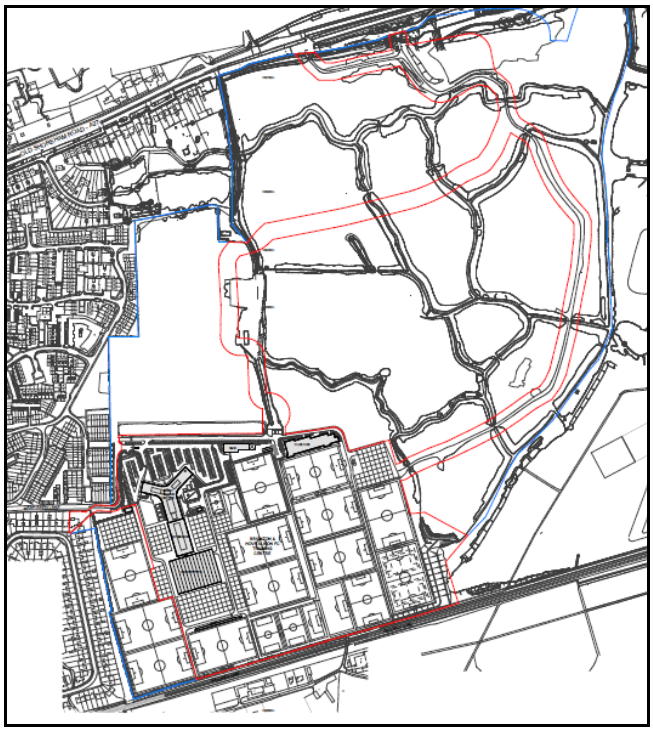
Application Number: AWDM/0236/19 Recommendation – APPROVE

Site: **Brighton And Hove Albion Training Ground, 60 Mash Barn Lane, Lancing**

Proposal: **Reconfiguration and extension of Training Ground including extension to existing Training Centre building, erection of a new single storey 'Club Hub' building to include women's and girls' changing rooms, community changing rooms and pitchside seating for parents/coaches, formation of an additional three pitches and training grid, reconfiguration of existing pitches including relocation of indoor pitch, showpitch, spectator stand, floodlighting and camera tower, provision of additional 51 parking spaces, provision of a temporary construction haul road from the A27, plus hard and soft landscaping.**

Applicant: The Community Stadium Limited Ward: Mash Barn
Case Officer: Peter Barnett



Not to Scale

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Proposal, Site and Surroundings

The application relates primarily to land comprising the grounds of the Brighton & Hove Albion FC Training Ground on the eastern edge of Lancing. The application also includes an additional area of land on the eastern boundary of the Training Ground, including land previously occupied by a collection of agricultural buildings known as North Barn Farm.

The application proposes an extension to and reconfiguration of the Training Ground to include the following elements:

- The erection of a single storey building (94m long, 28m wide and 5.4m high) in the north-eastern corner of the site to be used as a 'Club Hub' and which will replace temporary changing rooms and a reed bed which is currently used to treat foul sewerage from the site. (New foul sewerage facilities are to be provided in a new pumping station north of the site, within the New Monks Farm development site).

- The Club Hub will provide women's and girl's changing facilities, changing facilities for users of the community pitch, a gymnasium, swimming pool, classrooms, medical & treatment room, storage, offices and pitchside seating for up to 60 parents/coaches. The Club Hub building would be finished in white render with grey render feature banding.

- A 2 storey extension to the existing training centre building on its south side, 60m in length, on the site of the existing indoor pitch. The extension would be finished to match the existing building.

- The relocation of the indoor pitch southwards and the subsequent relocation and reorientation of the showpitch, also southwards, adjacent and parallel to the railway line. The existing spectator stand would also be repositioned to face south with the camera tower facing north. The floodlights would also be relocated.

- Provision of 3 new grass pitches on the eastern edge of the site, comprising 2 full size pitches, 1 half size pitch and training grids. These pitches would not be floodlit.

- The application has been revised to incorporate a 3 metre high closeboard fence along the southern boundary of the new pitches with 3.6m high ball stop fencing along the east and north boundaries.

- Construction access will be provided from the existing 'haul road' off the A27, thereby avoiding the need to access the site via Mash Barn Lane.

The site is bounded to the north and east by the land subject of application AWDM/0961/17 (NMF land) with Shoreham Airport further east. To the south the site is bounded by the railway line with sporadic residential development in Old Salts Farm Road beyond, just under 40m from the boundary. To the west there are dwellings in Barfield Park and Daniel Close.

The application is supported by a Planning Statement, Design and Access Statement, Transport Statement, Noise Impact Assessment, Air Quality Assessment, Landscape and Visual Impact Assessment, Lighting Impact Assessment, Ground Investigation, Flood Risk Assessment, Energy Statement, Ecological Appraisal, Aviation Technical Note, Archaeological Mitigation Strategy and a Statement of Community Involvement.

It is alleged that works have commenced on site with extensive ground works taking place in the area of the proposed relocated showpitch on the southern boundary. The applicants have denied that these works are in connection with the current application, however, and have stated that they are resurfacing the pitches and installing undersoil heating only. The works have involved excavations and constitute an engineering operation which your officers have advised the Club requires planning permission. Depending on the outcome of this application, a retrospective application for these works may be required. Even if works have commenced Members will be aware that the application has to be dealt with on its planning merits irrespective of whether an element of the current proposal is retrospective.

Relevant Planning History

AWDM/0205/12 – Construction of a training ground and football academy for Brighton and Hove Albion Football Club with access from Mash Barn Lane, comprising 11 outdoor pitches (2 of which are floodlit), external training grids, a Y-shaped 2 storey building to house changing rooms, associated offices, medical facilities, gym, catering and leisure facilities, a grounds maintenance building, security lodge, half-sized indoor training pitch and small sub-station/boiler house/refuse and recycling structure, plus 303 car parking spaces, 25-30 cycle spaces, coach parking, on-site access roads, security fencing and landscaping around the site.

AWDM/0205/13 – Construction of 3no. additional football pitches (1 x grass, 2 x artificial) and relocation of reed bed on land to east of approved training ground. Continuation of acoustic fencing on northern boundary plus fencing and landscaping to site boundary.

AWDM/0171/14 - Installation of floodlighting to previously approved northernmost community pitch (amendment to planning permission AWDM/0205/13 for construction of 3 No. additional football pitches (1 x grass, 2 x artificial), relocation of reed bed, extension of fencing and landscaping to site boundary)

AWDM/0277/14 – Application for a minor material amendment to permission reference AWDM/0205/12 to enable replacement of half-sized academy pitch with a futsal (5 a side) pitch, 3G surface and running hill (max. height 2.5m)

AWDM1716/15 - Construction of spectator stand to accommodate a total of 500 people (to include 6 wheelchair and helper positions) and camera tower.

AWDM/0759/16 - Formation of a landscaped bund (north of training ground) and provision of an access (for maintenance vehicles only) to the Ground Maintenance Building and Community Pitch from Mash Barn Lane (with access for construction traffic to be from A27)

Consultations

West Sussex County Council: No objection from a transport/highways aspect subject to conditions relating to car and cycle parking and a Construction Management Plan.

Comments as follows:

Trip Generation
A robust trip generation exercise has been undertaken which predicts an additional 35 inbound vehicle movements between 7-8am and 35 outbound vehicle movements between 3-4pm. It is noted that these times are outside the network peak hours. The narrative notes that these movements have previously taken place at the training ground before being temporarily relocated to the Amex stadium. As such no concerns are raised about the trip generation potential.

Construction vehicles
Construction vehicles would access the site via the existing haulage road to and from the A27. A construction management plan is also to be conditioned.

Parking
It is proposed to provide 51 new car parking spaces, 4 of which will be disabled and 2 electric vehicle charging points. 8 new cycle parking spaces will also be provided.

Travel Plan
Whilst a Travel Plan was conditioned as part of the 2012 application to construct the original training facility and a commitment included within to conduct biennial TRICS SAM surveys no supporting data from this has been included within the submission. Therefore it is recommended that the travel plan is updated to take account of the proposed development and for this to include evidence that either:
 TRICS SAM surveys have been conducted (and if so what progress towards the target has been made) or
 TRICS SAM surveys will now be commissioned.

The County Archaeologist: No objection on archaeological grounds. The proposed archaeological mitigation measures should be provided for through the use of a suitable planning condition

Local Lead Flood Authority: Current mapping shows the majority of the site is at a low risk from surface water flooding. Any existing surface water flow paths across the site must be maintained. Therefore, a wholesale site level rise via the spreading of excavated material should be avoided. Any excavated material kept on site should be located in areas designed and designated for that purpose.

The majority of the proposed development site is shown to be at high risk from groundwater flooding. This risk and appropriate mitigation should be considered in any future designs especially with regard to underground structures and utilities.

We do not have any records of historic surface water flooding within the confines of the proposed site although locations within the adjacent housing estate to the west of the site have experienced historic flooding. This should not be taken that this site itself has never suffered from flooding, only that it has never been reported to the LLFA.

The FRA included with this application proposes that the existing attenuation storage tanks will be used to control the runoff from the development. This method would, in principle, meet the requirements of the NPPF, PPG and associated guidance documents.

It is recommended that this application be reviewed by the District Council Drainage Engineer to identify site specific land use considerations that may affect surface water management and for a technical review of the drainage systems proposed - in particular whether the storage tanks have the capacity for the additional surface water run-off.

Please provide further information with regards to the ‘relocation of the proposed New Monks Farm secondary flood defence bund to allow for the location of the proposed additional pitches at the east of the development site’. It states that it is ‘agreed for the New Monks Farm Development’ but details should be provided as part of this application.

Ordinary Watercourse Consent will be required for the diversion of the watercourse on the eastern boundary of the site.

Development should not commence until finalised detailed surface water drainage designs and calculations for the site, based on sustainable drainage principles, for the development have been submitted to and approved in writing by the Local Planning Authority. The drainage designs should demonstrate that the surface water runoff generated up to and including the 1 in 100 year, plus climate change, critical storm will not exceed the run-off from the current site following the corresponding rainfall event.

Development shall not commence until full details of the maintenance and management of the SUDs system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved designs.

Please note that Schedule 3 of the Flood and Water Management Act 2010 has not yet been implemented and WSCC does not currently expect to act as the SuDS Approval Body (SAB) in this matter.

Adur & Worthing Councils: The ***Environmental Health*** officer has made the following comments:

The site is an existing sports facility which is being expanded and the main points of contention appear to be the attended matches on the show pitch, the acoustic barrier and the lighting.

With reference to the Planning Noise Advice Document Sussex July 2015. https://www.adur-worthing.gov.uk/media/media,121802,en.pdf Chapter 4 Sports and Recreation, it is recognised that in some circumstances, the noise levels generated from these types of activities are likely to be higher than would normally be accepted for other development consents, such as industrial processes, because of the characteristics of the noise generated, the controls that are possible, and the pattern of use. For these activities, the LPA will need to take account of how frequently the noise will be generated and how disturbing it will be.

It is inevitable that noise from this type of activity will be audible. We are tuned to hear the character of human voices even when they exist at background levels. It will therefore be noticeable and disruptive and will create a low observable effect level. National Planning Policy Guidance 2014 (Noise) suggests in such circumstances that the noise should be mitigated and reduced to a minimum.

The applicant has acoustically assessed two locations for the match pitch, one suggested by the planning officer and their preferred site. Moving the pitch, as suggested by the planning officer, will provide marginal improvements for homes south of the railway line but marginal increases to property to the west of the site. The assessment considered worst case maximum noise from the matches and found these affected more significantly homes to the west of the site in the suggested position than if left in the preferred position. Therefore out of the two positions assessed the preferred position would be the optimum position for the match pitch.

Existing noise levels to the south of the training ground area are already fairly high and the operational noise from the proposed new layout and the evening matches will increase these levels marginally. The training ground has planning permission to play 25 matches a year, 10 of which will be played during the day. Therefore, the worst case increased noise created by matches will only be short lived events for a maximum 15 evenings a year. Data provided by the club on previous matches has shown so far that

this number has not been reached and actual crowd attendances so far have been below what has been acoustically modelled for this application. Given the current use of the site, the planning controls restricting the number of matches and attenuation provided by the proposed 3 metre high close boarded fence, noise from the matches will be mitigated as much as possible and I have no objections to the application.

With regards the barrier, an acoustic barrier works by making sound diffract (bend) around the barrier to reach the noise receptor, during which process the level of sound at the receptor location is reduced in comparison with that without a barrier in place. The amount of screening attenuation depends upon the amount of diffraction. A barrier that just intersects the direct path (line of sight) between a source and receiver can provide 5dB attenuation at all frequencies. As the projection into the direct path increases, the amount of attenuation also increases, with better performance at higher frequencies than at the lower frequencies.

For most applications an acoustic barrier that significantly intersects the direct path may provide up to around 10dBA to 15dBA attenuation, depending upon a range of other factors. This is different to the amount of sound that can break directly through the barrier material, which must be somewhat lower than that diffracting around the barrier if its acoustic screening performance is not to be compromised. Making the barrier denser will not necessarily improve the acoustic attenuation of the barrier. This confuses the barrier materials' sound reduction index (how much sound is prevented from breaking through the material) and any screening attenuation (which is location specific and depends upon the source, barrier, receptor locations, etc). Therefore the barrier specification recommended by the applicant's acoustic consultant for this application will be sufficient.

Finally, having considered the lighting assessment, I can confirm I have no adverse comments to make on this matter. There are only 15 evening games allowed each year so the lighting will not be a permanent feature. Also LED lighting can be dimmed and when matches have finished the lighting can be reduced to further minimise the impact until the area has been cleared at which time they will be turned off.

The ***Engineer*** has no objection. Comments that the site does lie in Flood zone 3, but is protected by the EA Tidal Walls scheme, it is in an area of high ground water, and low permeability might cause issues with surface water infiltration. However the designers have taken these points into consideration and effectively reduced their impact to acceptable risk levels.

My concerns are whether the existing surface water recycling tank and pitches can accommodate the additional runoff from the new buildings. The FRA states that the pitches and other green areas can accommodate the extra flow – what happens if these are already saturated? Are these potential flows now included in the Monks Farm Assessment?

I would also ask, what happens in the event of a failure of the sewage pumping station – which ultimately will take all the flows from the football club and the Monks Farm development – where is the storage capacity in the system?

Finally at 7.3.5 of the FRA there is reference to the relocation of the secondary bund - are there any details?

Whilst I would like answers to the above, I do not see that there is any reason to raise an objection to this application.

{*NB a response has been received from the applicant's drainage consultant and is reported under the Drainage section later in this report*}.

The **Planning Policy Manager** has made the following comments:

The existing footprint of the Academy lies within the Built Up Area Boundary (BUAB) as defined within the Adur Local Plan 2017. Part of the development is on land outside of the BUAB, and therefore within the Local Green Gap and Countryside as indicated on the Policies Map.

An additional two pitches to the eastern boundary were agreed at Adur Planning Committee on 3rd October 2018 (subject to Secretary of State determining whether to call in the application and the completion of a S106 Agreement), as part of the New Monks Farm development (AWDM/0961/17) and therefore the principle of this development has been accepted. This application will effectively relocate these two additional pitches further south to make room for the training grid to the north. As a result the proposed landscaping between the proposed homes and pitches to the south (which form part of application AWDM/0961/17) will not be delivered, and the training grid will back directly onto residential properties. There are therefore issues of impact on homes in terms of noise and potentially lighting. I note the proposal includes development of floodlighting. Policy 15: Quality of the Built Environment and Public Realm states that lighting incorporated into developments should illuminate the target only and avoid light pollution. The lighting should be carefully controlled to ensure minimal overspill into countryside and Local Green gap area and any nearby residential properties.

The relationship between the facilities of the Football Academy, and the surrounding countryside and residential areas is important. However, the supporting material indicates that the additional pitches will not be floodlit, and will be surrounded with acoustic fencing; these principles should be secured through condition to ensure this remains the case.

In policy terms there is therefore incursion into the LGG and countryside, (further south than established by AWDM/ 0961/17) contrary to policies 13 and 14 of the Adur Local Plan; the relocated pitches do not constitute 'quiet, informal recreation' as required by Policy 13. However given that the principle of these pitches has been accepted by

AWDM/0961/17 and that the proposed extension is bounded by the railway line to the south, and proposed Country Park to the east, in this specific case there is no policy objection. (Should AWDM/0961/17 not be implemented a reconsideration of factors including boundary treatments, etc should perhaps be reviewed).

It should be noted that the area of disused agricultural buildings does not constitute brownfield land as stated in paragraph 6.4 of the Design and Access/ Planning statement as agriculture does not constitute development in planning terms.

Environment Agency: No objection

Highways England: Recommend condition requiring a Construction Management Plan be attached to any planning permission that may be granted:

Southern Water: Request following conditions are imposed on any consent:

"Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development"

{NB this appears to be an incorrect condition as the consultation response refers to dwellings}

"Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water."

Natural England: No comment.

Lancing Parish Council: Lancing Parish Council objects to the proposed Brighton & Hove Albion Training Ground Planning Application (AWDM/0236/19) on the following grounds:-

1) Severe flood risk to residents residing around the Training Ground and beyond;
2) The development will have a negative impact on the environment destroying ecology, wildlife habitats, including a loss of trees and hedgerows which breaches the Wildlife and Countryside Act 1981 and the European Habitats Directive 1992/Nesting Birds Directive;
3) The proposal is an overdevelopment of the site;
4) The development will create additional noise nuisance and there will be an overall disturbance from the scheme;
5) The increase in traffic flow from the development will heighten pollution levels to an area that is already above acceptable levels.

Sport England: Sport England is satisfied that the proposed development meets exception 2 of our playing fields policy in that:

'The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.'

The Football Foundation on behalf of the FA have now informed me that they are content with the new information provided following their previous queries and fully support this project, which is also considered to be providing new facilities to meet demand.

This being the case, Sport England does not wish to raise an objection to this application.

This planning application will allow the Club to introduce further First Team facilities that are now considered 'best-practice' Hi in the Premier League, and development of a Club Hub which will provide dedicated facilities for their Women's and Girls' teams and 'Albion in the Community'. This will widen the community offer available on site through programmes delivered by AITC. There is an existing Community Use Agreement on the site, from previous investment. As part of this project, AITC have consulted with a number of community football clubs/users. In order to secure this community use, the FF would want an updated Community Use Agreement to be provided, to be agreed with Football Foundation and Sussex County FA, in line with the intended use for the site. This element could be determined by way of a condition.

South Downs National Park Authority: It is clear that the training ground is highly visible from the South Downs National Park and also from designated heritage assets within the National Park, such as the Grade I listed Lancing College. Accordingly, the proposals are within the setting of these designations and due regard should be had to the potential impact upon them and, in the case of the National Park (NP) designation, how this engages the statutory purposes and duty of the NP.

Whilst the proposal does not raise any overriding concerns, given the scale of the existing development, it is requested that consideration is given to the following:

- The impact upon the tranquility and dark skies of the NP
- The necessity of any additional lighting
- The impact of the external finish of buildings upon views out of the NP

Network Rail: No comments received

Civil Aviation Authority: No comments received

Shoreham Airport: No comments received

Natural England: No comments

Representations

13 letters of objection received from the occupiers of 9 Glebe Way, 52 Barfield Park, 228 Brighton Road and from Bramble Farm (3 letters) and Fidelis (2 letters) in Old Salts Farm Road, from occupier of a unit at Shoreham Airport (2 letters), 1 unspecified address and an address in Bognor Regis:

- More green space being developed and consequent loss of area for water to percolate into ground soil.
- More traffic movements and therefore further degradation of air quality
- Residents will have to endure more traffic, loss of privacy and traffic noise
- Overdevelopment
- Relocation of showpitch, spectator stand and floodlights will impact on properties south of the railway line
- Pitch should be moved northwards, nearer to the car park, to minimise crowd noise and light pollution
- Impact of light glare on train drivers must be considered
- This application should be considered only if the LPA is satisfied that a proper aerodrome safeguarding study shows that the development will not affect aerodrome operations at Shoreham Airport and an aerodrome safeguarding plan is lodged with the LPA rather than rely on a report commissioned by the developer.
- Current aviation report is inaccurate
- Civil Aviation Authority should comment on impact to the airport
- Work has already started without permission and at unreasonable hours
- Will have even greater impact on our lives
- Already suffer from noise generated from the site as demonstrated in audio footage submitted to the Council
- Change in direction of the stand to face south will worsen impact
- If BHAFC showed any consideration to residents then the show pitch would be relocated to the east of the indoor pitch
- Noise complaints have been submitted to Environmental Health which have failed to rectify the impact
- Contravenes Human Rights Act and the right to peace and quiet in home
- Will hold the Council responsible if approved
- Increased light pollution
- There are no streetlights in Old Salts Farm Road
- Basic human right to be able to rest at night and to enjoy night sky without pollution
- There is a right to fly and land a helicopter at our property. The ability to do this will be affected by tall floodlights and light glare
- Football Club has constantly pushed the boundaries and has duped the community into believing that this site would be an asset
- Local community has not benefitted despite inflated claims of the Club
- Overdevelopment

- Out of keeping with the area
- Failure of officials to visit to assess impact
- Why can't under 23 matches be played at the Amex stadium?
- Daily exposure to noise from machinery working at the ground
- Noise from loud singing, chanting, foot banging, cheering from stand plus shouting from pitch and touchline
- Fireworks set off on one occasion
- Parties with loud music audible from covered pitch
- Unable to sit and relax in own garden
- 4m high fence will have adverse impact on views
- Any fence to be installed should be a proper acoustic design
- Unnecessary to build separate women and girls facilities. Why can't facilities be shared in the main building?
- The Club 'drip feed' more and more development – this is the 6th planning application in 4 years
- Council should concentrate on regenerating the village of Lancing rather than swamp it with yet more football pitches
- How many pitches does the Club need?
- Will add to problems of existing failing sewer system
- Extra surface water run-off will worsen drainage problems
- Unacceptable inconvenience for residents, particularly in conjunction with NMF/airport applications
- Should not develop on local green gap and floodplain
- An acoustic fence was never provided
- Why is community pitch being used by the women and girls team

19 letters of support received from the occupiers of 7 Manor Road, 14 Manor Close, 8 Seaside Road, 3 Greenoaks, 41 Chester Avenue, 3 Fircroft Avenue, 2 Myrtle Road, 72 Shadwells Road, 9 Penstone Park, 8 Orient Road, 58 Hayley Road, 46 Greet Road Lancing; 4, 10 Arnside Close, 21 Beeding Close, 38 Abbey Road Sompting, plus addresses in Worthing and Horsham:

- Obvious benefits to the local area which has been neglected for years
- Those opposing are simply doing so for personal outdated reasons
- Fully support enhancement of women and girls' teams facilities
- BHAFC are very important to Sussex and need to remain at forefront of progression
- Training ground is a huge success but the Club needs to keep up with current developments
- More employment for the area
- Club has already invested a considerable amount of money into the area
- Club has excellent record of developing links with community and providing facilities for the disadvantaged and disabled
- Dedicated classroom will enable increase in education programme

Relevant Planning Policies and Guidance

Adur Local Plan 2017 Policies 5, 13, 14, 15, 18, 28, 30, 31, 32, 33, 34, 35, 36
National Planning Policy Framework (February 2019)

Relevant Legislation

The Committee should consider the planning application in accordance with:
Section 70 of the Town and Country Planning Act 1990 (as amended) that provides the application may be granted either unconditionally or subject to relevant conditions, or refused. Regard shall be given to relevant development plan policies, any relevant local finance considerations, and other material considerations; and
Section 38(6) Planning and Compulsory Purchase Act 2004 that requires the decision to be made in accordance with the development plan unless material considerations indicate otherwise.

Planning Assessment

Countryside and Local Green Gap Policy

The existing footprint of the Training Ground lies within the Built Up Area Boundary (BUAB) as defined within the Adur Local Plan 2017 (ALP). Most of the development, including the new Club Hub building, will be located within the BUAB. However, the easternmost part of the proposed development is on land outside of the BUAB and therefore within the countryside as indicated on the Policies Map. Two of the new pitches and a training grid are also within the Local Green Gap. Policy 13 of the ALP states that "*Outside of the Built Up Area Boundary (as shown on the Policies Map), development will only be permitted where the need for a countryside location is essential; it is for quiet informal recreation or the essential needs of agriculture or horticulture, flood management, or is otherwise consistent with this Local Plan (or subsequent DPDs).*"

Policy 14 of the ALP states that such areas will be protected in order to retain the separate identities and avoid coalescence of these settlements (Lancing/Shoreham-by-Sea). It states that, "*Within these areas any development permitted must be consistent with other policies of this plan, and must not (individually or cumulatively) lead to the coalescence of settlements*."

However, the additional two pitches to the eastern boundary were agreed at Adur Planning Committee on 3rd October 2018 (subject to Secretary of State not calling in the application and the completion of a legal agreement), as part of the New Monks Farm (NMF) development (AWDM/0961/17). Whilst, the Council is still awaiting the Secretary of State's decision, the principle of such development within the Gap has been previously accepted by Planning Committee. This application will effectively push these two additional pitches further south to make room for the training grid to the north.

No floodlights are proposed on these pitches. Additional pitches are also proposed on land formerly occupied by North Barn Farm, which has recently been demolished, to the south east of the existing Training Ground site. This land is outside of the Local Green Gap but is within the Countryside.

The proposed development would conflict with the above policies in that formal sport facilities such as football cannot be defined as a quiet recreational use. However, this application does not propose any additional buildings, car parking or lighting within the countryside or Gap. The proposed development will maintain a largely open landscape, albeit formally laid out as pitches with formal landscaping and fencing.

In light of the resolution to grant permission for these pitches under AWDM/0961/17 and that the proposed extension is bounded by the railway line to the south, and proposed Country Park to the east, in this specific case there is no policy objection, notwithstanding current countryside and local green gap policy.

Design, Layout and Landscape/Visual Impact

In terms of the wider landscape impact, a Landscape and Visual Impact Assessment (LVIA) has been submitted. The existing Training Ground buildings, particularly the covered pitch, are prominent features in the landscape and the main consideration is what impact the additional buildings and development will have on the wider landscape, taking into account the existing buildings and the resolution to grant the New Monks Farm housing development on land to the north and east. Notwithstanding the New Monks Farm development proposal, the land to the north is allocated for housing and commercial development in the adopted Local Plan.

The LVIA considers that there would not be a significant change in the landscape character of the area. It states that that additional pitches lie outside the site boundary on an area currently identified for additional pitches in the NMF application. It does not consider that the extension to the main building or the relocation of the covered pitch would result in a "*noticeable alteration to the existing landscape character*" although it does acknowledge that such development "*would increase the amount of visible built form from the north and east.*" It also acknowledges that the Club Hub would have a "*minor impact on the site character due to the land use change from sports pitch facilities to built form*" (actually a change from reed bed and unauthorised temporary changing facilities). It would also have a "*minor adverse impact on the openness of the site and its immediate context*."

The LVIA concludes that the NMF and Shoreham Airport developments will potentially generate significant landscape and visual impacts and that the proposed development at the Training Ground should be viewed in that context.

The National Park Authority has stated that "*it is clear that the training ground is highly visible from the South Downs National Park and also from designated heritage assets within the National Park, such as the Grade I listed Lancing College*." They have

requested that careful consideration is given to the impact of the external finish of buildings upon views out of the National Park. In particular, the large white dome of the covered pitch is an obtrusive feature in the landscape. It is not considered that the relocation of the covered pitch further south would have any increased impact in longer views from the north and east. However, the Club was asked whether it would provide an opportunity to seek a more muted colour for the covering but the Club has advised that the light white colour is essential in order to allow natural light onto the indoor pitch.

The extension to the main training centre and the relocation of the indoor pitch will extend built form further south and will present a 'longer' line of buildings particularly when viewed from the north and east. The new club hub building will also present a considerable length of built form along the northern edge of the site which will be prominent in views from the National Park to the north and east.

However, it is necessary to take into account the potential more significant developments proposed to the north and east which have been approved by Committee but which are still pending due to a possible call-in by the Secretary of State. Notwithstanding the outcome of that application, the site is allocated in the Adur Local Plan and residential development can be reasonably expected to come forward on the land directly to the north of the training ground. Therefore, when seen in the context of that expected development, the proposed extension of the training ground facilities is not considered to have a significant adverse impact on the landscape character of the area or the setting of the National Park.

Transport and Parking

The site will continue to be accessed from Mash Barn Lane to the west. All construction traffic will access the site from the A27, via an existing haul road across the NMF land.

A Transport statement submitted with the application states that the Training Ground currently experiences on average a total weekday flow of 800-900 movements, which is largely as initially predicted when the original application for the Training Ground was submitted in 2012. Weekend movements average 700 movements, which is more than double that originally predicted.

The reorganisation of the pitches, provision of additional pitches and the extension to the main building are not anticipated to result in a "significant" increase in staff numbers and no changes to the parking layout is proposed. No material change in the number of vehicular movements is expected either.

The Club Hub will generate a need for more parking and 47 new spaces are proposed on the northern edge of the site. The Club Hub will accommodate the Girls' Regional Talent Centre (RTC) and Women's Reserve Team which are being relocated from the main building on the site and will therefore not generate any additional traffic. The Hub will also accommodate the Women's First Team (approximately 35 players and staff) who currently train off site at the AMEX stadium in Falmer. These will be additional

movements therefore, which are likely to be outside of peak hours. It should be noted, however, that these are movements that have previously taken place at the site before the First Team was temporarily relocated to the AMEX stadium.

One of the major concerns of local residents previously had been the impact of traffic associated with the proposal on the local highway network and on residential amenity. West Sussex Highways have raised no concerns about the trip generation potential associated with this development and, given the relatively low level of increased traffic anticipated in the Transport Statement, it is not considered that there any sustainable highway reasons to refuse the application.

Noise and Residential amenity

A Noise Impact Assessment has been submitted to assess the impact of the relocation of the indoor pitch, the show pitch and spectator stand, three new pitches and reconfiguration of the training ground. It notes that the pitches are used on a rotation system and that there would not be an occasion when all are in use at the same time. In general, only 3 or 4 pitches and 1 training grid are in use at any one time. More pitches are in use during the summer evenings than in winter, when usage is limited to the floodlit and indoor pitches only.

The noise data predicts that those dwellings to the south of the railway line (Fidelis, Bramble Farm and North Barn Kennels) would experience internal noise levels which would exceed the Lowest Observed Adverse Effect Level (LOAEL) of 30dB LAeq as defined in the Noise Policy Statement for England. This is the level above which adverse effects on health and quality of life can be detected.

The Noise Assessment argues that as residual (background) indoor noise levels already exceed the LOAEL by a considerable amount (46-47 dB LAeq) and that "*the nature of the sound experienced from the training ground would remain similar to the current situation*, *the impact of the proposed development would be minimal and the small change in internal noise levels is unlikely to be perceptible*."

Notwithstanding the conclusions of the noise assessment, there is concern that moving the showpitch and stand closer to the southern boundary (and reorientating the stand so that it faces south rather than west as is currently the case) could have an increased adverse impact on the amenities of those residents in the dwellings identified above. The occupiers of Fidelis and Bramble Farm have submitted detailed representations and audio visual recordings demonstrating the level of noise that they currently experience from the site. Noise appears to be largely from machinery operated at the site (lawnmowers, strimmers, leaf blowers) but noise was audible from the showpitch and stand, particularly during one match where loud chanting could be heard. It is understood that this was a "one-off" but nevertheless, bringing the pitch to the southern edge of the site, closer to the affected dwellings, does raise concerns. The Club was asked to consider relocating the pitch to a less unneighbourly position, such as further north to the east of the main building. The Club has indicated that, for operational

reasons, it would not be possible to move the showpitch to that location as it is within the Academy area. The site is split between the Academy and First Team and facilities are not shared. The showpitch is used by both the First Team and the U23s and it must therefore be located in an area which is easily accessible by both.

The Club was then asked whether it was possible to relocate the showpitch immediately north, swapping places with the training grid shown to the south of the relocated indoor pitch. This would result in the showpitch remaining in the same area for operational reasons but it would be further from the nearest houses. However, the Club has stated that,

"*the area to the north of the relocated showpitch is reserved in case further expansion is required in the future to ensure compliance with Category 1 standards*. *The proposed location is also required as operationally it allows greater control and access for visitors, scouts, friends, family, attending the showpitch. The technical evidence we have submitted with the Planning Application confirms that the proposed development will not cause any significant harm to amenity. It must also be taken into account that this is relocation of an existing facility which is only used for spectator matches a few times a year (15 evening matches with over 100 spectators since the Pitch opened in 2016) and otherwise used for First Team training three mornings a week. The number of times it can be used by spectators is controlled by an existing condition, effectively meaning that in any one season there can only be 15 matches occurring in the evening with attendance of over 100*."

The Club's acoustic consultants have also submitted a revised report indicating that any reduced noise level to residents to the south would be imperceptible and it would create an increase in noise levels to dwellings in Barfield Park to the west, although it should be noted that it would be closer to its existing position if it were to be moved further north.

The supplementary noise report now also proposes a 3 metre high close boarded fence along the full extent of the southern boundary to replace the existing 2m high fence. It states that a fence higher than 3m is not required in order to provide adequate noise mitigation. It is agreed that a taller fence would have amenity impacts in terms of loss of outlook for nearby residents. It should be noted that this will be a closeboard fence rather than an acoustically designed fence, but the applicant's noise consultants have advised that such fencing will provide effective mitigation and this view is supported by the Council's Environmental Health Officer (EHO).

The pitch will be in excess of 40m from the nearest dwelling, separated by the railway line, while the stand will be over 110m away. Whilst, there is some sympathy for the affected residents in Old Salts Farm Road, in the light of the submitted technical evidence, and the lack of objection from Environmental Health, it is difficult to argue that the proposed development would result in a demonstrable harmful increase in noise disturbance to local residents compared to existing noise levels. There are, therefore, no grounds to refuse the application on loss of amenity in relation to noise disturbance.

In the north east corner of the site it is proposed to site the club hub building and a new training grid. The training grid in particular will impact on the proposed new houses as indicated on the layout plan submitted with application AWDM/0961/17. The grid will remove a landscaped buffer and will bring the Training Ground immediately adjacent to the rear boundaries of several houses. This is regrettable and the Club was asked to redesign this corner to reinstate a buffer. However, the layout has not been amended and a 3m high closeboard fence has been added instead to act as a screen for the houses. While this will provide some acoustic protection, the proximity of the training ground to the new houses is rather close. Revisions to the housing layout may be possible instead.

Lighting and Residential Amenity

The relocation of the showpitch also results in the relocation of the floodlighting for that pitch, bringing it closer to the southern boundary and the houses in Old Salts Farm Road.

The applicants' lighting impact assessment confirms that the proposed lighting will not cause any significant harm to amenity. Each luminaire will be hooded to prevent light spillage and to direct light towards the pitch. The proposed 3m high fence will further mitigate any light spillage towards residents.

The EHO does not have any concerns about the impact of the lighting on the residents in Old Salts Farm Road, particularly as the floodlights will not be switched on all the time, there being only 15 evening games per year.

Drainage and Flood Risk

The applicants' Flood Risk Assessment states that the development will incorporate a sustainable drainage system that will retain all surface water on site via existing underground tanks for irrigation of the pitches and storm water storage. In extreme conditions overflow from the existing system into the Lancing Ditches can occur but applicant's drainage consultants have advised that the onsite as designed system has more than sufficient capacity under the new pitches to accommodate the 100 year plus 40% event.

Foul water will now be discharged to a new pumping station which is to be constructed on land to the north of the site (within the applicant's ownership) and which will replace the existing reed bed treatment system. In response to the Engineer's query about possible pump failure, the applicant's drainage consultant has responded as follows:

"*The foul storage, in the event of pump failure of both the duty and standby pumps in the proposed adoptable pumping station, is located in the upstream foul water pipe network in both the New Monks Farm Site and between the gravity connection from the Training Ground boundary and the Pumping Station. All storage is located below the*

lowest private lateral connection and has been agreed with Southern Water as part of the ongoing Section 104 Application for that development. The storage for the training ground development is in the gravity pipework upstream of the foul pumping station. The pipe system in this section incorporates approximately 145m of 600mm diameter pipework and provides over 40m3 of storage. The proposed pumping station and gravity network will be adopted by Southern Water and will have duty and standby pumps to minimise any pump failure."

Finally, with regard to the relocation of the bund referred to in the FRA, the applicant's consultant has stated that that in the event that the New Monks Farm development adjacent to this proposal proceeds it will be necessary to adjust the Flood Bund which currently forms part of New Monks Farm Development to allow construction of proposed Pitch 17.

The Environment Agency and the Council's Drainage Engineer have no objection to the proposed drainage strategy.

Ecology

The applicant's ecology report concludes that no significant habitats will be affected by this development. While some habitat will be lost, particularly around the area of the former North Barn Farm, there were no protected species found. Works to demolish the barn and clear the ground have taken place under ecological supervision and outside of the bird nesting season.

In order to achieve biodiversity gain it is suggested that bird and bat boxes could be provided plus use of appropriate plant species in any landscaping scheme. This can be secured by condition.

Archaeology

A written scheme of archaeological investigation has been submitted which outlines proposed archaeological mitigation measures. The County Archaeologist has no objection subject to the use of a suitable planning condition to secure such measures.

Impact on Shoreham Airport

An aviation report submitted with the application had originally calculated the transition slopes incorrectly. A revised report has been submitted which has now corrected this calculation. It concludes that the proposals are compliant and the development will have no impact on the safe operation of the Airport. Proposed buildings are moving closer to the approach and take-off slopes while 3no. floodlights will now be underneath the approach and take-off slopes. However, all structures will be just over 18m underneath the slope (the floodlight farthest to the east), with this clearance height increasing further to the west.

Brighton City Airport has written to confirm that they have consulted with the CAA and it has no objection to the development.

Sustainability and Energy

The development is proposing to use efficient insulation, ventilation and lighting as well as air source heat pumps to provide heating to all spaces where cooling is also required. PV panels are also proposed to meet the 10% carbon emissions saving requirement of Policy 19 of the Adur Local Plan (117 on the training centre extension and 208 on the club hub). The development aims to meet the BREEAM 'Very Good' rating, as required by Policy 18.

Community Use

The proposed club hub would significantly improve the facilities for users of the community pitch providing dedicated changing facilities to replace the unauthorised portacabins currently in use. The club hub will also be the main centre for the women and girls teams. Clarification was sought as to how this may impact on the availability of the pitch by the community and the applicant's agent has responded as follows:

"*The Women & Girls Elite team train on grass and therefore will be using the new grass pitches 16 and 17 and training grids on north side of these two new pitches. Clearly it makes sense to combine their facilities with the AITC facilities alongside the community pitch. The Women & Girls Regional Talent Club already use the Community pitch and is part of the Women & Girls Development programme jointly managed with AITC which is very much in line with the existing Community Use Agreement.*

Consequently there will be no reduction in the availability of the Community Pitch. Over the years since the pitch has been in use we have seen steady growth in the number of hours it is being used and number of participants."

On this basis, there is no concern that use of the community pitch will be adversely affected by this proposal.

Sport England has indicated that an updated Community Use Agreement should be secured by way of condition.

Recommendation

Recommend that planning permission be granted subject to the following conditions: -

1. Approved Plans
2. Standard 3 year time limit
3. Materials to be agreed prior to construction above slab level
4. Foul sewerage facility to be provided prior to first use of extended training centre or club hub

5. Suds maintenance details to be agreed
6. All operations associated with the development hereby permitted shall be carried out and completed in accordance with the approved Archaeological Mitigation Strategy and Statement of Significance and with the approved Written Scheme of Investigation for Archaeological Excavation and Monitoring under Archaeological Supervision and Control, unless otherwise agreed in writing by the County Planning Authority.
7. Fencing to be erected before new pitches are first brought into use
8. Approved parking spaces to be provided prior to first use of club hub
9. Construction access from A27 only. This access not to be used once facility is open.
10. Construction Management Plan to be submitted and approved
11. The use of the football pitches hereby approved shall be limited to between the hours of 9am until 10pm every day
12. Landscaping to be provided in accordance with plans within first planting season following completion of the works
13. Floodlighting shall be limited to Pitch Nos 4, 11 and 13 as shown on drawing no. 18827-KSS-ZZ-ZO-DR-A-9004 rev P1 received 14 February 2019 and the floodlights shall be switched off between the hours of 10.15pm and 9am every day and all other external lighting at the facility shall be switched off between 11pm and 7.30am, with the exception of security lighting. Floodlighting of the showpitch (Pitch 4) shall only be switched on during matches watched by spectators with tickets which shall be limited to a maximum of 25 times per season (1 July - 30 June) as specified in condition x.
14. No public address or sound amplification system to be installed or used
15. Hours of work for construction 8am to 6pm Mondays to Saturdays
16. At no time shall the facility be used in connection with any park-and-ride scheme
17. The training facility and club hub hereby approved shall not be open other than between the hours of 7.30am and 11pm every day
18. The development hereby approved shall incorporate renewable energy technology in the form of air source heat pumps and PV panels in accordance with details to be submitted to and approved in writing by the local planning authority before construction above slab level. The development hereby permitted shall not be occupied unless and until a BREEAM Design State Certificate and a BRE-issued Post-Construction Review Certificate confirming that the development has achieved a BREEAM rating of 'Very Good' has been submitted to the Local Planning Authority.
19. No part of the development hereby permitted shall be occupied until an updated Travel Plan has been approved in writing by the local planning authority and implemented. The Travel Plan shall demonstrate that either TRICS SAM surveys have been conducted (and if so what progress towards the target has been made) or that TRICS SAM surveys will now be commissioned. It shall also include arrangements for monitoring and effective enforcement with any necessary new measures or interventions implemented accordingly.
20. All matches on the showpitch with over 100 spectators shall be ticket only and booked in advance with no sale of tickets on the day at the Training Ground. The

number of ticketed spectators watching any match shall be limited to a maximum of 500. The number of matches watched by spectators with tickets shall be limited to a maximum of 25 per season (1 July - 30 June), with a minimum of 10 of these matches to be completed before 4pm on the day of the match, with the number of matches to be played in the first season or part thereof following completion of the construction of the stand to be worked out on a pro-rata basis and agreed in writing with the local planning authority prior to first use of the stand. Details of the number and dates of ticketed matches, the times they were played and the number of spectators that attended shall be made available to the local planning authority on request.

21. The rear door panels on the camera tower hereby permitted shall be closed at all times other than when hoisting equipment to and from the tower
22. Before the stand hereby approved is first used, details of the proposed arrangements for managing parking demand during ticketed matches shall be submitted and approved by the local planning authority in consultation with West Sussex County Council Highways and the agreed details shall be incorporated into the previously approved Travel Plan for the facility. Such details shall also include the proposed method for advising spectators and visitors to adhere to speed limits and to respect the amenity of neighbours when entering and leaving the facility.
23. Pitch 13 as identified on drawing no. 18827-KSS-ZZ-ZO-DR-A-9004 rev P1 received 14 February 2019 shall be reserved for community use.
24. Evidence of biodiversity gain to be submitted before construction above slab level and thereafter implemented
25. The development hereby approved shall not be brought into use until an updated Community Use Agreement has been submitted to and approved in writing by the LPA in consultation with Sport England

13th May 2019