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16 June 2021

Dear Sirs,

Planning Application DM/21/014/04/FPA

Address: Leamside Equestrian Limited Stud and Equestrian Centre, White House Farm, Pit House Lane, Leamside, Houghton the Spring.

Proposal: Engineering operations to create a football centre incorporating the creation of 20 no grass pitches (Use class F"), demolition of existing stable block, creation of new building to provide changing facilities, creation of car parking and widening of existing access track.

The Parish Council welcomed the pre application opportunity to ask questions of a member of the applicant's consultant team at its virtual Parish Council meeting 15 October 2020. Regretfully, questions regarding the expected number of users/visitors/vehicles accessing the site could not be answered at this meeting. These details were not provided in any subsequent pre application communication. The statement made in paragraph 4.2 of the Community Consultation document that , "Parish Councillors were not opposed to the principle of the development of a football centre *on the site",* is incorrect as more information was required before the Parish Council was able to consider the proposal in detail.

Having now had an opportunity to review the application, the supporting documentation and the concerns raised in the many individual resident responses, the Parish Council objects to this proposal for the following reasons:

Traffic Generation and Highway Safety

1. The development of a North East Regional Football Centre at Leamside, attracting users from a wide regional geographical area, will substantially increase the volume of traffic through the minor roads of West Rainton and Leamside. Residents already have on going concerns about the existing volume of traffic, safety of the A690 junction at Lambton View, speeding, increasing levels of on street

parking and the impact these issues have on the local community, be it in a vehicle, on foot, on a cycle or on horseback. These concerns have been exacerbated by committed developments at Benridge Bank and Station Road and now this proposed major development.

2. There are 3 access points to West Rainton from the A690. All join the Old Sunderland Road which runs parallel to the A690 from Benridge Bank to the junction at the top of Station Road.

3. In October 2018, the Specialist Operations Unit of Durham Constabulary undertook a 7day 24hour speed survey along the Old Sunderland Road, just east of the garage. This survey recorded an average daily traffic flow of 2486 over this period with an average speed of 34 MPH, 4% above the speed limit. 45 % of vehicles fell within Police Enforcement Thresholds.

4. The route along the Old Sunderland Road to Station Road is used by large numbers of non-residents to access Cocken Road, off Pit House Lane, when travelling to Framwellgate Moor, Pity me Newton Hall, the Arnison Shopping Centre, the A167 and beyond. It effectively provides a bypass to and from these destinations avoiding the congestion of Durham City. Similarly, many vehicles use the other main road through the village, the bus route, which runs parallel to the Old Sunderland Road, to access Station Road/Pit House Lane.

5. These 2 roads (and the whole of Station Road) are becoming increasing congested, especially around the shops/doctors surgery near the Station Road Junction, on South Street/North Street in the vicinity of the Italian Farmhouse/Jubilee Hall, opposite the play ground on School Avenue and around the primary school.

6. It is noted that base traffic data applied in the applicant's Transport Assessment relates to 2013 as due to the Covid-19 situation it was not possible to undertake new surveys to determine a 2020 base situation. Whilst a growth element was applied to the 2013 data using computer modelling, the lack of more up to date survey data relating to all the access roads in the Parish raises serious concerns about the validity of assumptions made and conclusions drawn.

7. It is noted that the DCC Highways consultee response has commented that there has been a significant amount of pre planning scoping of the traffic impact assessment for this development and has concluded that trip rates and distribution used in the Transport Assessment are acceptable, as are the resultant impacts. As nearby residents have pointed out in their individual comments to this proposal, there is strong disagreement that the impact will be acceptable. They know the reality of the impact on current traffic flows in and around the vicinity of the site far better than anyone else.

8. It is noted that paragraph 5.6.3 states that the results of the 2020 weekend base modelling operational assessment of the Lambton View/A690 junction are, "significantly over capacity". Despite this finding, the applicant concludes that the significant increase in traffic flow at this junction, as a result of this development, is acceptable. The

Highways Officer response is in agreement, stating that, “the signalisation of the West Rainton junction will address demand at this location.” When is this realistically likely to happen? Signalisation, although greatly welcomed, will not reduce the demand, just manage it more safely. Traffic volume and speeding down Station Road and along Pit House Lane will not reduce as a result of signalisation. Nor will it reduce the volume of traffic accessing West Rainton and Leamside from the other access points off the A690 on to the Old Sunderland Road, or the bus route through the centre of the village, leading on to Station Road and Pit House Lane.

9. The Transport Assessment of the impact of the development on highway road safety concludes at paragraph 2.4.2, *“the local highway network is operating safely and there are no patterns or trends that indicate any other specific highway safety problems along the local highway network”.* This conclusion appears to be solely based on personal injury collisions data for a 600m stretch of Pit House Lane (300m either side of the site access) over the 5year period 2015-19. The local highway network impacted by the additional traffic generated from the proposed development is much wider than this short section and will exacerbate existing speeding and road safety concerns on a number of roads throughout the Parish.

10. It is noted that data used in the Transport Assessment to determine the trip generation associated with the proposed development at Leamside is not based on actual usage of the Newbottle site. It is based on a survey undertaken 8/7/2017 to support a planning application submitted to Sunderland City Council in 2017 to extend from 6 to 12 pitches in operation at any time. Due to the Covid-19 situation and its impact on trip generation, activity and vehicle activity, new surveys which would represent a “normal scenario’ could not be provided.

11. Consequently, there is no assurance that actual operations in practice at Newbottle, in normal circumstances, adhere to the planning condition of the maximum 12 pitches in operation at any one time. Nor is there any assurance that the trip generation arising from the Leamside Centre (360 movements per hour on Saturdays) is not understated.

12. It is noted paragraph 6.44 states, “the site will only operate close to capacity for very limited periods.” This implies many more than 12 pitches will be in use at any one time.

13. A daily total of visitor number and monthly visitor statistics are published on the Russell Foster Youth League website. On the 31May 2021 there were 2180 visitors. The total number of visitors during May 2021 was 19,773. Consequently, some actual statistics regarding current operations are readily available. It is reasonable to assume that such statistics would be available prior to the Covid-19 restrictions being imposed in March 2020.

14. Paragraph 4.8 of the Planning Supporting Statement (PSS), states that, “it is reasonable to say that the use of the centre Monday-Friday is expected to be limited to use of indoor facilities only and a maximum of

one outdoor pitch." Paragraph 4.2.8 of the Transport Assessment states that, "it is expected that throughout the day during the week there would be only one pitch in use per hour until 17.00 and three pitches in use 17.00- 21.00 pm. The Transport Assessment of trip generation appears to make no allowance for the new indoor facilities that will be provided at the Leamside Centre.

15. Paragraph 4.9 states that on a Saturday and Sunday, "it is *expected* that a maximum of 12 outdoor pitches will be used at any one time. This would be for competitive fixtures when spectators would be expected to attend up to maximum of 20 spectators per pitch."
It is difficult to see how in practice spectators' numbers could be restricted to this maximum expectation.

16. No details have been provided of the expectations for the use of indoor facilities on a weekend. Nor have details been provided of expected usage for the use of the whole centre during school holidays.

17. No details have been provided of staff numbers/ coaches employed or their shift patterns, the number of officials required to be on site to manage fixtures and vehicle movements associated with servicing the facility.

18. This lack of actual and proposed operational data provides little assurance that the predicted trip generation for the Leamside centre and the impact that this will have on the local highways network and road safety, as stated by the applicant, is accurate. The predicted trip generation applied demonstrates that there will be a significant increase in trip generation as a direct result from this proposal. There is already evidence of overcapacity and speeding on access roads through the parish, which will increase as a result of this proposal, yet no mitigation measures have been proposed.

19. It cannot be evidenced that this proposal would not have, *"an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".* Consequently, the requirement of paragraph 109 of the NPPF has not been fulfilled.

Car Parking Provision

20. Paragraph 6.96 of the planning supporting statement says that parking provision has been carefully considered through detailed knowledge and experience of the car parking demand at the existing Russell Foster Football Centre at Newbottle. This resulted in the parking provision:

    259 visitor spaces
    10 Staff/coaches spaces
    10 disabled visitor spaces
    3 coach parking spaces

21. However, the Newbottle site location is substantially different from that proposed at Leamside. It is situated in a highly developed surrounding area, supported by an appropriate urban local highways network with

islands in the middle of carriageways. The site would make a prime site for further residential development, which it is assumed is a key driver for this proposed relocation.

22. The planning application made to Sunderland City Council regarding the Newbottle site states, “the site is well situated in terms of public transport and by a network of well-established walking routes, the majority of which are segregated from traffic”. It is therefore not unreasonable to assume the need for car parking provision will be lower at the existing site than what which will be required at Leamside because of the applicant’s acknowledged difficulties of delivering sustainable transport to this site e.g. the site is not on a bus route.

23. For the reasons outlined above, insufficient information has been provided by the applicant to assess the reasonableness of this parking provision. If provision is inadequate this will lead to on street / grass verge parking in the area, adding to residents existing concerns about parking problems in the vicinity.

24. As can be evidenced from published information relating to the Newbottle site on the Sunderland City Planning Portal and the Newbottle Action Group facebook page, on street parking in the vicinity of the Newbottle site is a major issue for local residents.

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25. It is noted that Paragraph 2.1.2 of the Transport Assessment states that the existing Newbottle Centre has “a central informal parking area of approximately 350 spaces”. This would suggest that the parking provision set out in this proposal is substantially inadequate.

26. It is also understood that at the existing facility at Newbottle anyone using the car park is asked to make a voluntary donation and as a result of no free parking provision some visitors choose not to park in the car park.

27. As this proposal is a replacement for the existing centre, it would be reasonable to assume that this policy could apply at Leamside. This is likely to lead to on street parking around the junction to Cocken Road and towards the Three Horse Shoes. There is already likely to be increased on street parking in this vicinity due to recent operational changes at the Three House Shoes and the opening of a Café at the farm opposite. The expected additional on street parking as a result of this proposal will exacerbate existing concerns about road safety, especially as there is a lack of roadside footpaths in the area.

Sustainable Transport

28. The proposed site is not on any public bus route.

29. The applicant acknowledges that due to the choice of the proposed site location, and the nature of the facility being created and age of users, visits to the centre will be predominantly by private cars – even if the centre was on public bus route. As the parking provision proposed makes no provision for cycle parking or electric vehicles, it is assumed

that none are expected, now or in the future, based on the experience of the current centre at Newbottle.

30. Whilst a travel plan has been submitted to attempt to improve the sustainability of the centre once operational, there is no evidence from the existing centre to suggest this is attainable.

31. It is therefore considered that this proposal will not delivery sustainable transport as required by the County Durham Plan (CDP) Policy No 21 and paragraph 110 of the NNPF in that:

- It does not give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second, so far as possible, to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.

- It does not create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles.

- It has not been designed to enable charging of plug-in and other ultra-low emission vehicles.

Countryside Development

32. The site is in a rural greenbelt. It is acknowledged the NPPF supports changes of use in the Green Belt for outdoor sport and recreation and the reuse of existing buildings. However, the development must not harm the openness of the Green Belt.

33. As set out in Policy 13 of the CDP, equestrian development is considered an appropriate countryside use and will be permitted where the proposal would not adversely impact on the general amenity of neighbouring properties and the wider area. An equestrian centre on the site fitted well with the surrounding area. This is not the case with this proposal football centre.

34. The proposed change of use from a local equestrian centre, (formerly a farm), to a regional football centre with 20 external pitches, an unspecified number of internal pitches, larger buildings and the provision for circ 300 vehicles operating 7 days a week until 9pm on an evening midweek, is not a like for like development implied by the applicant. It will significantly impact on the openness of the site and the rural character and nature of the surrounding countryside amenity.

35. There is no clear link to any of the exceptions which permit development in the countryside as specified in CDP Policy 10.

36. The PSS refers to the exception of the development to support, “the provision of new, or enhancement of, existing community facilities is a valid exception under this policy. This proposal will not create a new

facility for the community of West Rainton & Leamside. Nor will it provide a new facility for the wider regional community – just a replacement for an existing one currently located in a suitable sustainable location – albeit with the addition of an indoor facility. No evidence has been provided of the need of this indoor facility or that it needs to be located on the same site as the external pitches.

37. Paragraph 6.55 of the PSS refers to teams at Chester-Le-Street, Great Lumley and Waldridge being local teams to Leamside. They are not. They come under a separate ward division of Durham County Council. West Rainton & Leamside is much more closely associated with, Sherburn Village, Pittington and Belmont. No teams from these areas use the Newbottle centre. Local schools have no known need of any football pitches. There is an indoor football centre, Soccarena, 3 miles down the road at Belmont that provides eight state of the art *floodlit* indoor 6 a side football pitches. There is a sports centre in Sherburn Village.

38. This proposal does not demonstrate any essential and functional need for a facility of this type in this specific location. It does not meet the requirements of CDP Policy 10 or paragraph 84 of the NPPF as there is no local need for this development in this rural location.

39. Appendix A of the Transport Assessment shows the locations of the teams who would use the proposed facility. This illustrates that the concentration of football clubs' centres are around the Gateshead/Sunderland/South Tyneside areas. This implies that a much more sustainable location for the home of the Russell Foster league would be in a town centre within this area. (The NPPF identifies the more intensive sport and recreation uses as main town centre uses).

Economic Benefits

40. There are no economic benefits for the local community that will be adversely impacted by this development. Nor will there be any economic benefits for the majority of the users of the centre, who will have further to travel.

41. There seems very little economic benefit at all in relocating from the existing site – except for the prospect of the land owner selling the site for more profitable housing use.

Noise and Environment

42. This proposal will produce a significant amount of noise. Residents living in South Street in West Rainton have advised they can hear noise from the single football pitch off Adventure Lane, a ten minute walk away, on a Sunday morning. The impact on local residents living 5 metres away from potentially 20 external pitches and some indoor pitches will be totally unacceptable. The noise generated will also impact on local businesses in the vicinity as well as other residents living further away in Leamside and West Rainton.

43. Paragraph 6.70 of the PSS refers to there being no inter-visibility of the site and the Three Horse Shoes public house 200 metres away and, “consequently there is limited potential for any adverse impacts”, to this non-essential heritage asset. It is also suggested that the proposal may lead to new trade for the pub. What is not mentioned is that whilst there is a separate bar area, the majority of the business at the Three House Shoes is the serving of meals in its restaurant areas to the rear of the property. The Three Horse Shoes is a Country pub and thriving restaurant attracting customers from the local area and further afield. It has recently undergone work to offer bed & breakfast facilities and to improve the beer garden areas at the rear. The site may not be visible, but the noise generated from it will certainly be heard. This could be considered to have an adverse impact on the business, especially in the summer months/ light nights when customers may prefer to sit outside. Consequently, it cannot be demonstrated that the requirements in relation to Policy 44 of the CPD and paragraph 197 of the NNPR in relation to non - designated heritage assets has been met in this planning application.

44. Given the technical nature of the applicant’s Noise Assessment, the Parish Council asked a local resident, who has substantial experience of undertaking noise assessments, to review the document submitted by the applicant. His findings are detailed in the Appendix attached.

45. The conclusion reached from the applicant’s Noise Assessment as stated in paragraph 6.117 of the PSS, “it can be demonstrated that the noise impact on the existing dwellings are not significant”, is not accepted.

46. It is considered that this proposal does not meet the requirements of paragraph 170 of the NPPF that seeks to conserve and enhance the natural environment by preventing new development from contributing to unacceptable levels of noise pollution. Nor is it considered to meet the requirements of Policy 31 of the CDP. The “expectation” that no more than 12 pitches will be in operation at any one time, and the assumption that any noise will be masked from the noise from the motorway, are not considered appropriate mitigation measures to reduce the unacceptable level and type of noise that will be generated from the voices of football players, spectators, coaches and officials.

47. It is also of interest to note that a planning condition relating to the planning application made to Sunderland City Council, to increase the number of pitches in use from 6 to 12 in 2017 at the Newbottle centre, does not as yet appear to have been fully discharged. Consequently, there is no evidence to support noise generation from the existing centre, in an urban location, is within acceptable levels.

48. It is noted that it is not intended that flood lighting is to be installed at the centre as part of this application as, unlike at Newbottle, evening games/training in the darker nights are planned to be held in the indoor facility. However, no details have been provided of the indoor facility as part of this application. There are also contradictions in the supporting statements about the number of external pitches to be in use on an evening as mentioned above. It is not unreasonable to assume that,

should this application be approved, a further application will be submitted to vary the approved application for this purpose. Had flood lighting been included in this proposal, it is difficult to see how this could be argued that this would not have an unacceptable impact on the character and nature of the local amenity and on existing neighbours. Flooding lighting of pitches would have a much wider impact in terms of light pollution other than just the immediate vicinity.

Summary and conclusions

49. The site of the former Equestrian Centre at White House Farm, Pit House Lane, Leamside is not considered a suitable location for a regional football centre. A football centre located on rural greenbelt is a very different type of development to that operating previously on the site.

50. The data used to support the application is incomplete and / or out of date. Consequently, it has not been demonstrated that all the relevant requirements of DCC Planning Policies and the NPPF have been met.

51. The application, if approved, will have a significant impact on existing residents in the vicinity of the site and the wider local community of Leamside and West Rainton as a result of:

- No sustainable transport
- A substantial increase in traffic volume and reduced road safety – across all access rounds within the Parish
- A substantial increase in on street/grass verge parking in the vicinity of the site, damaging the environment and further reducing road safety
- A loss of amenity; substantial change of character and nature of the existing countryside environment
- A substantial increase in noise pollution, particularly for nearby residents and businesses, but also the wider community
- The lack of any economic benefits to the local community to help offset the adverse impacts as a direct result of this proposal
- The lack of any demonstrable need for football facilities in the area to help offset adverse impacts on the local community
- The lack of effective mitigation measures to reduce the adverse impacts on the local highways network
- The lack of effective mitigation measures to reduce the adverse impact on the local community from increased noise pollution
- The lack of any financial contribution to offset the adverse impacts on the local community

This application should therefore be rejected.

Determination

52. In view of the above objections the Parish Council welcomes the request, made by DCC local ward members, that this application be referred to Planning Committee for determination, should officers be mindful to recommend approval of this application. Local residents are so strongly against this application that they really deserve an opportunity to be heard in person.

53. In addition, for Planning Committee members to fully appreciate the site location, residents concerns and the adverse impact this proposal will have if approved, not only on existing residents in the vicinity but also on the wider local community of West Rainton & Leamside, a member site visit is also requested before a determination is made.

Signed:

Mark Ramshaw
Parish Clerk, West Rainton & Leamside Parish Council

Appendix

Planning application to build a football centre at Leamside. Observations on a Noise Report prepared for this application.

Background

The Russell Foster Tyne & Wear Sports Foundation is seeking planning permission to build a football centre at Leamside. The proposed development comprises a mixture of 14 seven-a-side/nine-a-side outdoor pitches and 6 five-a-side outdoor pitches. In addition to these 20 natural turf pitches, there will be an indoor sports hall and 259 visitor parking spaces.

The applicants proposal states that Monday to Friday, there is *predicted* to be only one pitch in use at any one time either indoors or outdoors (8am-5pm). In an evening (5pm-9pm), *it is expected* that the maximum usage would be the indoor facilities and one outdoor pitch. Monday to Friday *is not expected* to be for competitive fixtures where spectators will attend.

On a Saturday and Sunday from 09.00 to 16.00, *it is expected* that a maximum of 12 outdoor pitches will be in use at any one time. This will be for competitive fixtures when spectators would be expected to attend, up to a maximum of 20 spectators per pitch.

NOTE: The proposal is not definitive about the actual playing arrangements, it merely states that levels of usage are "*predicted*" or "*expected*". If the plan is to use only 12 out of the 20 available pitches it would seem that having a 40% redundancy is unnecessary. However, it should be noted that the applicants current set up in Newbottle was originally granted permission for 6 operational pitches but a variation order extending that to 12 pitches was subsequently submitted and approved. There is no reason to expect that the applicant will not come forward with a similar variation request were this application to be granted planning consent.

NOISE ASSESSMENT REVIEW

As part of its submission the applicant commissioned NJD Environmental Associates Ltd. to undertake a noise assessment at the proposed site. That noise assessment report (Ref: D/I/D/136795/504) is reviewed in this section.

What is immediately clear is that the report does not contain any explanation of the noise parameters used, such as A-weighted Leq (dB), and therefore it would be impossible for a non-technical person to make a reasoned review of the report without a knowledge of environmental acoustics. Including explanatory notes is standard practice and recommended in the Institute of Environmental Management and Assessment (IEMA) "Guidelines for Environmental Noise Impact Assessment".

Noise Survey

The author selected a point 5m from the site boundary to conduct his noise survey, close to a representative noise sensitive property overlooking the proposed site.

The recorded noise levels reported in Appendix 1 of the report cover 11 hours of a Saturday, 24 hours of a Sunday and 11 hours of a Monday. Each 24 hour period is divided as follows:

	Start time	End time
DAY	07.00am	23.00pm
EVENING	19.00pm	23.00pm
NIGHT	23.00pm	07.00am

Although the author reports 3 noise parameters, the most relevant one for this type of noise assessment is the A-weighted equivalent noise energy level over a period of time T, i.e. $LA_{eq,T}$, where T in this case =1 hour.

I have calculated the LAeq values reported by the author in Appendix 1 and found they are correct. However, in Table 4.1 the value for Sunday 8th November is incorrectly reported as being 63 dB(A) whereas it should be 53dB(A). This is a transcription error but a reported 10 dB(A) excess in the main body of the text could be misleading, particularly as a Sunday is likely to be the day on which local residents would reasonably expect their quietest noise environment.

Being a local resident, I would agree with the author's observation in paragraph 4.5 that noise levels at this location are dominated by road traffic noise from the A1M.

Noise Predictions

Having established a baseline noise level the author then uses an environmental noise prediction software package (CadnaA) to predict likely noise levels arising from football activities and site traffic.

In any noise prediction model you need to determine source noise levels, preferably expressed as octave, or even 1/3rd octave band sound power levels, and also the source type, e.g. point, line, area, etc. The author has turned to a 2015 report by Sport England on the acoustic implications from sports activities on artificial grass pitches (AGP) to establish a reference for pitch noise levels.

In paragraph 2.7 the author states that Sport England report identified raised human voices as the most significant noise source from an AGP, quoting an Leq level of 58dB(A) at 10m from pitch sideline.
Note this figure was determined from relatively few noise measurements and did not include spectators – the raised human voices were players only. Furthermore, since these are only guidelines from Sport England they did not publish clear details of their measurement process, so there is some uncertainty in exactly what the 58dB(A) represents in terms of noise source levels and how it would be incorporated into a noise prediction model. For example, does it represent the sound pressure level at any point 10m back from the boundaries of a pitch?

Since the applicant already has an operational site at Newbottle, it would be sensible to obtain relevant noise level data from that site, with spectators present, to establish realistic source noise levels.

The author correctly models for a worst-case scenario of all 20 pitches being used concurrently. However, his predictions, based as they are on Sport England data, excludes noise from spectators. With 20 pitches in operation, each having up to 20 spectators, there could be 400 spectators present in addition to 256 players. (Even with only 12 pitches in use there could be up to 240 spectators and 144 players present.)

With up to 20 enthusiastically cheering spectators around each pitch one would expect them to make at least as much noise as the players. That suggests source noise level would likely double at pitch side from the 58 dB(A) figure reported by Sport England to 61dB(A). (A doubling of noise energy results in a 3dB increase in noise level).

In paragraph 5.6 the author talks about "the contours calibrated to reflect those presented in the Sports England guidance". Presumably this refers to the 58 dB(A) level at 10m from a pitch boundary without spectators. What is unclear is the use of the word "calibrated".

Have the predicted noise levels been constrained in some way to fit the contour map in the Sport England report?

I have some concerns over the predicted noise levels (Table 5.1) at existing receptors due to pitch noise only. For example, ESR2 is estimated to be no more than 20m from the nearest pitch boundary with the model predicting an LAeq value of 50 dB(A) at ESR2 due to players alone. However, the Sport England document states that when a site is in an open location, noise levels of 50dB LAeq(1 hour) can be achieved at a distance of 40m from pitch sideline, at 1.5 m above the ground – a number which my experience would suggest is reasonably accurate.

Therefore, for a receptor closer than 40m to the pitch the predicted noise level should be greater than 50 dB(A), and this is for players on a single pitch. Including contributions from players on other pitches, as the author claims to have built into his model, should result in even higher predicted noise levels at ESR2. Adding in the noise from spectators would further increase predicted noise levels.

Access Road Traffic Noise Levels

Individual vehicles travelling on the site will presumably be travelling slowly (10mph limit?) so they will not generate much noise. However, a more significant vehicle noise issue, not addressed in the report, will be the closing of vehicle doors and engines starting.

Sanderson Associates who reported on traffic issues for this application based their modelling on a 2013 survey for Station Road, which in itself is not representative of peak weekend traffic numbers and has been subjected to a number of factors, each with inherent uncertainty, in an attempt to update the numbers. In a number of tables in Sanderson's report the ratio of flow to capacity (RFC) was quoted as being outside the limits of the traffic flow model. In my experience the generation of such out of limit numbers from modelling software is indicative of (a) a poor model, (b) incorrect data input or the most common cause (c) a degree of misunderstanding by the operator on how the model actually works. Whatever the cause, it undermines confidence in the report to see spurious results published.

Whatever the flow models say about junctions on the A690, the fact of the matter is that vehicles will arrive and depart the site along a minor country road (Pithouse Lane). The applicant failed to carry out an existing traffic count on this road although they were able to undertake a speed survey.

The applicant predicts there will be some 360 vehicle movements per hour on the site for 7 hours a day every Saturday and Sunday. With access to and from Pithouse Lane this potentially significant increase in traffic volume will inevitably cause issues entering and leaving the site and moving through the local villages.

Assessment Methodology

The author bases his assessment of the significance of measured and predicted noise levels on IEMA guidelines.

In paragraph 6.5 he quotes the IEMA guidance that a simple change in noise levels between a "baseline" level and "with development" level is not sufficient to adequately define the overall significance of any particular development – a statement that I would agree with.

He goes on in paragraph 6.6 to explain what other factors IEMA considers are pertinent in assessing the significance of a development, in particular he cites the spectral characteristics of "with development" noise compared to existing "baseline" frequency characteristics. He

acknowledges that noise associated with using the football pitches will differ from the existing acoustic environment – again a statement I would endorse.

We would agree that the current local noise climate is dominated by traffic noise from the A1M. However, introducing this development will produce a different element into the local noise environment. The acoustics of humans shouting, and that's what players and spectators do at football matches, is very different from the low frequency rumble of traffic noise. I would therefore contend that the proximity, visibility and frequency characteristics of noise from spectators and players will have a noticeable and potentially adverse effect on local residents quality of life, particularly as this will occur at weekends.

The attempt in paragraphs 6.8 and 6.9 to portray the site as having an established recreational use as an equestrian centre, implying that local residents are already conditioned to the sound of loud human voices, is stretching reality somewhat. The site owner occasionally kept family and friends horses on the site but you could not describe the site as an active equestrian centre.

Despite the author's dismissal of any significant effect on the local noise climate arising from the proposed development, I would argue that the presence of many voices (players and spectators) shouting/cheering on the site changes the nature of the existing noise climate.

I would further contend that the source noise levels used in the noise predictions have been underestimated and there is a problem with how the noise attenuation model has been implemented.

Resolving these issues is likely to result in an increase in predicted noise levels, thereby requiring a further assessment in line with those described in IEMA guidelines. That assessment may necessitate a further review or possible rejection of the application.

Ian Diggory
6th June 2021

BRIEF BIOGRAPHY
Background in physics and mathematics. Postgraduate studies in experimental nuclear physics and cosmic ray physics. Currently a risk consultant on asset integrity in the global oil and gas industry.

Initial acoustics experience gained during a 5 year research post at Newcastle Polytechnic, working on a range of environmental noise issues including traffic noise, opencast operations and building acoustics. Followed by 3 years as an independent consultant to British Gas' Acoustics Group developing an environmental noise prediction software package for gas installations. Involved in experimental acoustics and noise monitoring activities at various British Gas sites. Contributed to BG noise standards, lectured on Noise Control Appreciation courses and developed a "Noise at Work" training course delivered under the auspices of the Institute of Acoustics at Northumbria University.