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East Sussex
TN31 6PJ

8 May 2019

Ms Rebecca Burt
Planning Officer
Rother Planning Department
Rother District Council
Town Hall
Bexhill-on-Sea
East Sussex TN39 3JX

Dear Ms Burt

**Rye College Artificial Multi-use Games Pitch. RR/2019/785/P
3G synthetic football pitch with goal recesses, spectator area, floodlights, perimeter fencing and changing facilities**

The full Executive Committee of the Society has considered the current application by Rye College for a new full-size illuminated artificial football pitch and has asked me to write and object to the application for the following reasons.

1.0 Background

In 2009 Rye College received approval (RR/2009/3032/C) for a new multi-use games artificial surface pitch on the site of the former tennis courts (see attached sheet MUGA 1). The application was supported by a full set of documents including a lighting and noise assessment, assessment of need, management and community use plan, traffic management plan, and details of the neighbour and community consultation undertaken. The hours of use at that time were set at M-F 0830-2100, Sat 1000-1700 and Sun 1000-1800. The site is protected by school buildings on three sides and was open to the existing playing field on the other. The height of the floodlight poles was 10m, being a function of the size of the pitch in order to achieve the necessary illumination levels.

In 2011 an application (RR/2011/2454/C) was granted to extend the hours of use to M-F 0830-2200, Sat 1000-2000 and Sun/BH 1000-1900. There were no objections from neighbours and the additional hours were as a result of usage and demand determined over the previous two years by the College and by the adjoining sports club which ran the out-of-school-hours facilities.

In 2013 an application (RR/2013/334/P) for a new dance and drama studio adjacent to the artificial pitch was approved. As part of the documentation, an ecology assessment was undertaken which highlighted the potential for protected species being present in the surrounding landscape.

2.0 Site

The site lies outside the proposed development boundary included within the Rye Neighbourhood Plan (RNP), recently approved to go to referendum. The Examiner specifies that this does not mean that development cannot legitimately take place outside the boundary. However the Society believes that it is for the applicant to prove that any such development is essential, which this application currently does not.

The site abuts the boundary of the AONB and the illumination and potential noise will have an effect on the setting of the AONB. The recent appeal decision to uphold the refusal for the BP filling station on Udimore Road partially on the grounds of its impact on the AONB, even though the site was just outside the boundary, is pertinent to this case.

To the south-east of the site is an extensive area of woodland covered by a Tree Preservation Order. Retention of this woodland has been given significant status within the RNP as part of the design criteria for the projected housing site H8, the former Thomas Peacocke site, to the south of the existing College playing fields. It is considered important both on the grounds of the screening effect when seen from the town and its conservation area and because of its biodiversity potential.

One of the reasons for this application is the current state of the grass pitch and the need for extensive works to bring it up to standard, as well as to extend the period of use by the provision of floodlights. The Society believes that, before this application is considered, the applicant should indicate why funding for the artificial pitch and protective fencing could not be used to upgrade the existing grass pitch, with significantly reduced impact on the amenity of the neighbouring residents. The current lack of floodlighting appears to impact on the potential community use, as the College still has the benefit of the floodlit smaller artificial pitch during the college core period.

3.0 Use

The proposed hours of usage are M-F 0800-2200, Sat 0800-1800 and Sun 0800-1800 with the college core time being M-F 0800-1730. This represents an increase in the potential use of the pitch beyond what was accepted for the smaller pitch in 2011 but no evidence is provided to substantiate the need for any increase. This is particularly important because of the proximity of residents in Tillingham Avenue and the potential effect of noise and light spillage on their amenity.

The Society notes that Sports England has yet to comment on the proposals. From comments on the application made on Rother's website, it would seem that no approach has been made by the College to potential community users to ascertain future needs for a range of sports.

4.0 Landscape

The relationship to the adjacent AONB boundary, the open fields to the north and west and the views from the upper town are important factors in any development in this location. We have attempted to show the impact of the light poles and the 8m fencing when seen from St Mary's tower and from the footpath along Tillingham Avenue. See attached MUGA 2&3. We believe that the impact is likely to be of a magnitude to require the applicant to provide their own photo-montages from salient viewpoints.

Much is made in the applicant's information of the tree line along the Tillingham Avenue footpath which they believe will reduce the effect of noise and light pollution on the houses. These are only 60m or so from the corner of the proposed pitch and flood lights. We would point out that this is a deciduous hedge with occasional trees as can be seen from the attached photos MUGA 4. Given the proximity of the floodlights to it and the height of the lamps above the ground, any such mitigation is likely to be limited.

5.0 Biodiversity

Given the proximity to the AONB, the TPO woodland and the green corridor along the River Tillingham, we believe it is essential that a biodiversity study should be provided not only for the site but also for its immediate surroundings, given the potential disruption from light and noise.

6.00 Management and Community use

We note that no Management and Community use plan has been put forward.

7.0 Neighbour and Community consultation

We note that a programme of community consultation was undertaken for the previous artificial pitch. This contrasts with the lack of any such outreach for the current much larger and potentially more disruptive application. It is also of concern that no mention of this project was made during a presentation by the College at the recent Town Meeting. 50% of the available time appears to have been allocated for the community yet the community does not seem to have been consulted, either on an individual or sporting group basis.

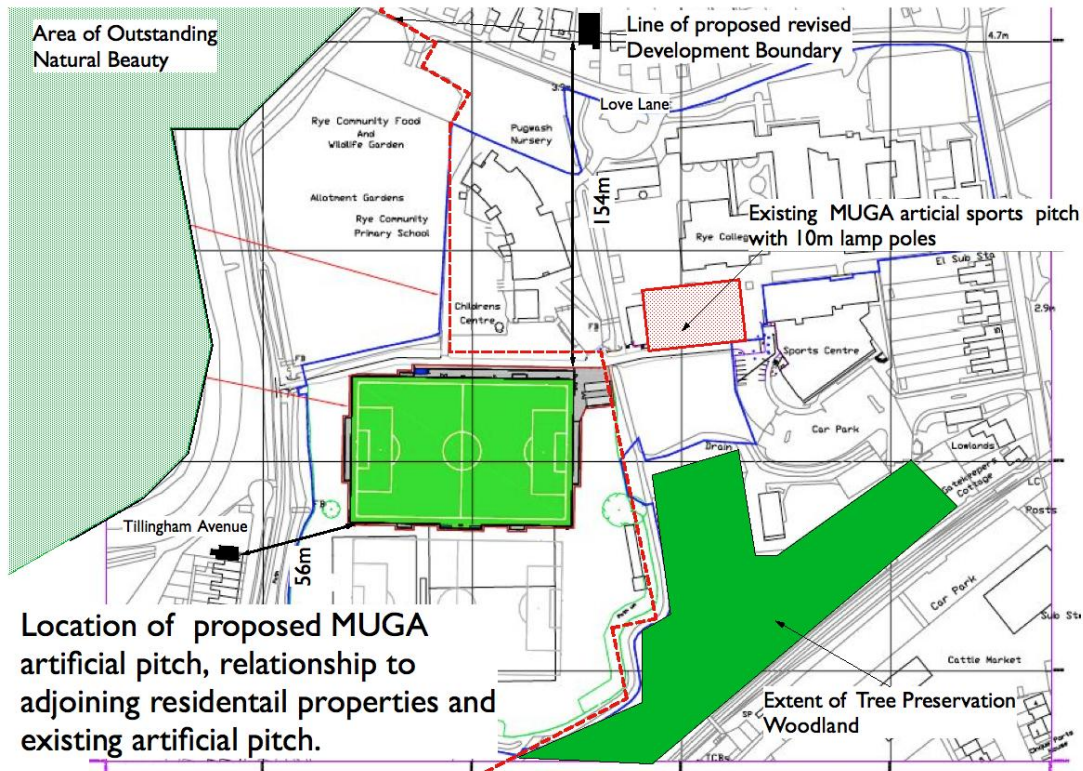
8.0 Traffic Management plan

Given the potential hours of use and the area for spectators, the use of the facility by groups arriving by coach and/or minibus cannot be ruled out. A detailed plan needs to be provided of how parking and access for pedestrians and vehicles will work, both during the school core period and during community use.

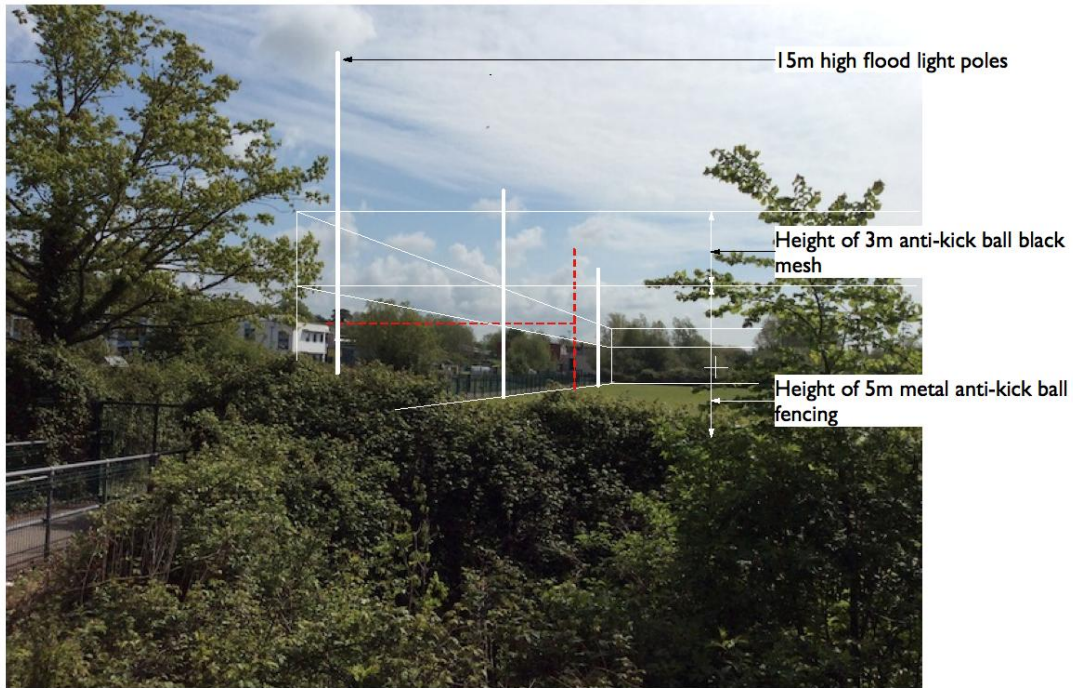
For the above reasons the Society objects to the current application. We believe that it will have an unacceptable effect on the amenity of the neighbouring residents, on the setting of Rye in the landscape and, until evidence is provided to the contrary, on the local biodiversity and the current access arrangements. The College has **NOT** made the case for this Application.

Yours sincerely

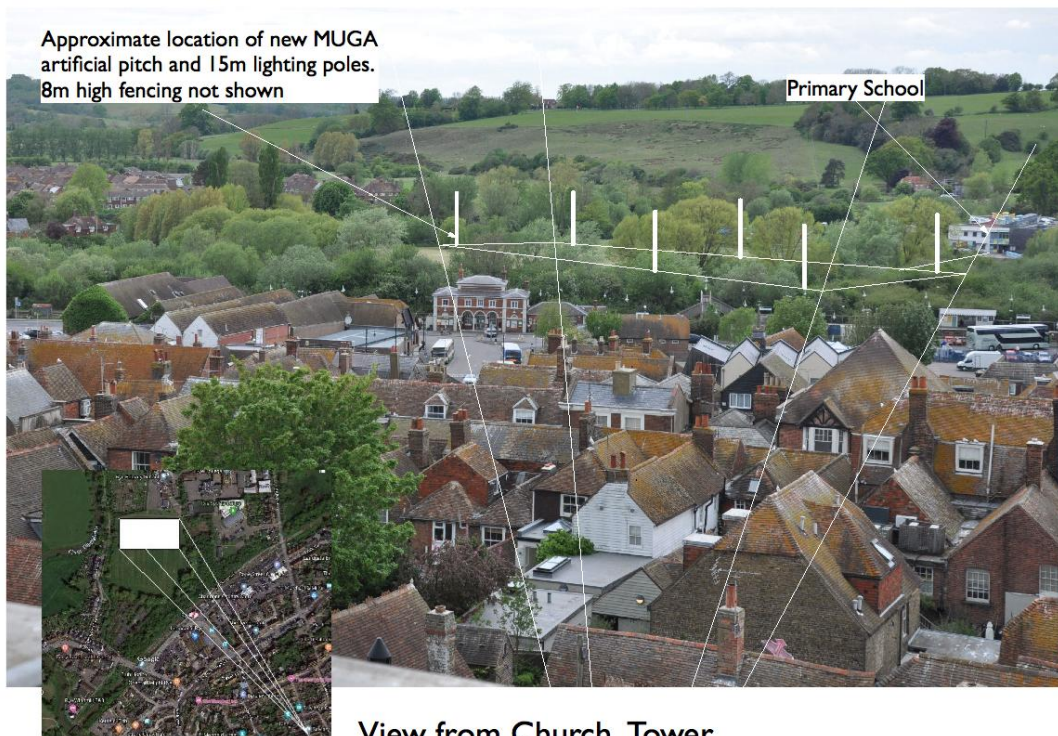
Julian Lockett
Chairman, Planning Committee
Rye Conservation Society



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View from Tillingham Avenue footpath



View from Church Tower

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Views into site from footpath along Tillingham Avenue show porous nature of vegetation

