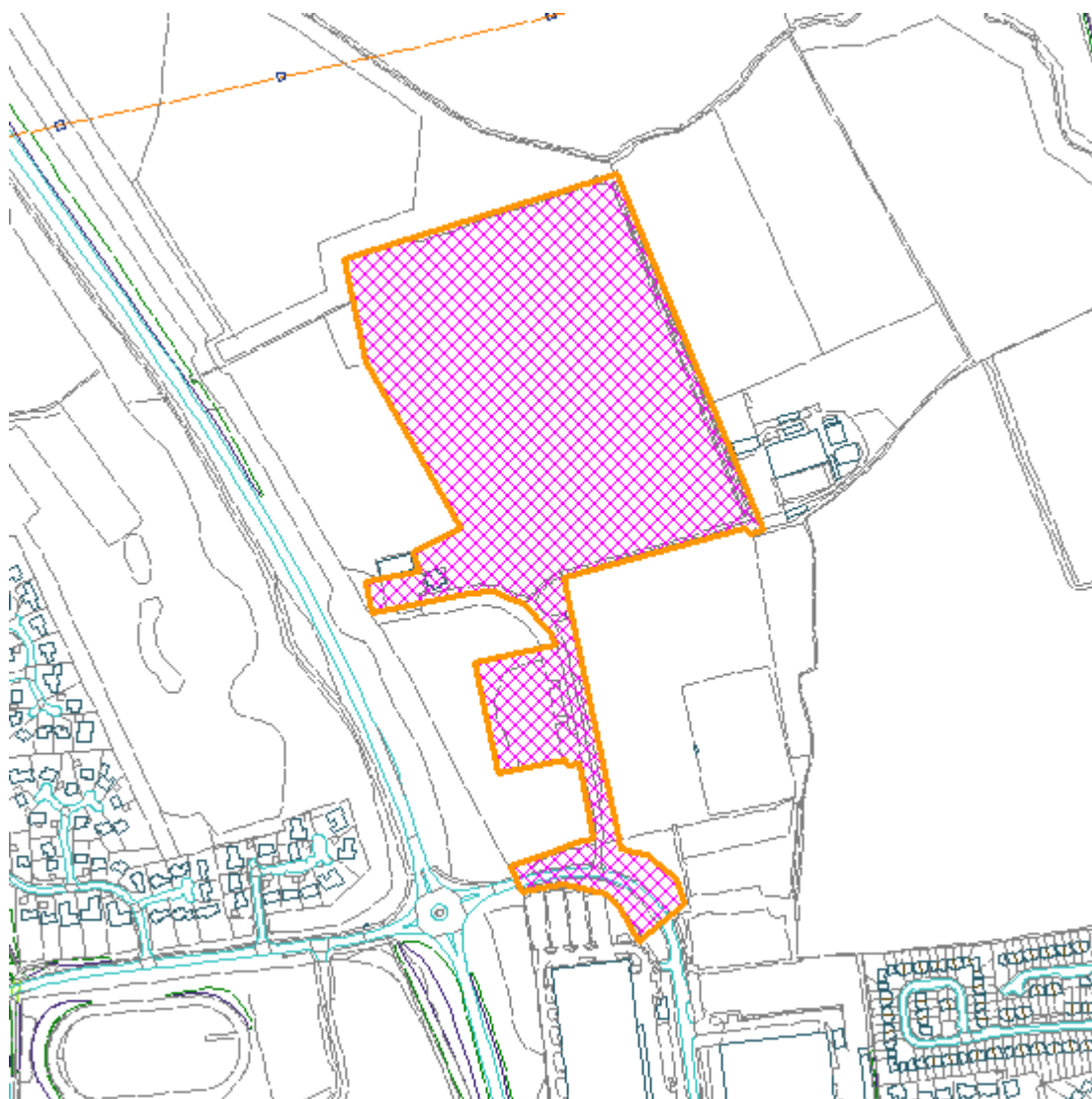


Planning Application Reference: 17/02425/LP3

Northern Area Playing Fields, Stephenson Road, Stephenson, Washington

Application description:

Demolition of existing changing pavilion. Engineering works to re-grade site and install drainage to facilitate the provision of 4no artificial pitches (3no football and 1no dual football/rugby) with associated fencing, floodlighting and improvements to remaining existing natural grass pitches; erection of new pavilion building to include changing facilities, club room and bar, kitchenette and education space; alterations to existing access and associated works and provision of associated car and cycle parking, signage, landscaping and boundary fence. Provision of bridleway and barrier treatment and provision of 2no passing places.



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Proposal

The application proposal comprises the replacement of and addition to the existing sports facilities at the Northern Area Playing Fields, which is located adjacent to the Washington AFC's Home ground. The proposal includes:

- Creation of 3 full sized fenced and floodlit football 3G AGP (sizes);
- Creation of 1 full sized fenced and floodlit dual purpose pitch for rugby and football 3G AGP (sizes);
- The floodlights comprise masts mounted with luminaires at a height of 15 metres above ground level.
- Improvements to the one remaining natural grass pitch;
- Demolition of the existing changing pavilion and the erection of a new single storey modular pavilion building to include 8 changing facilities, club room & bar, kitchenette and education space;
- Provision of approximately 321 on site and off site car parking spaces;
- Associated boundary fencing, lighting, signage and landscaping;
- Provision of 2 passing places to improve access to the Washington Riding Centre;
- Formalisation, improvements and extension to the existing bridleway around the site perimeter, including access control measures.

As detailed above the application proposal is seeking planning permission for a range of development designed to reinvigorate and improve the football facilities available at the site as part of the 'Parklife' programme.

Parklife is a collaborative programme between the Football Association (FA), Sport England and local authorities. It is a scheme that seeks to create a sustainable model of improved football facilities and improved football delivery based around Artificial Grass Pitches (AGPs).

The Council's 2014 Playing Pitch Strategy modelled the role that an increase in the number (football compliant) AGPs could play in helping to improve the quantity and quality of football pitch provision within the City. The Council's application to be a Parklife Authority and the subsequent work with its partners has, over time, resulted in the chosen three hub sites.

The Northern Area Playing Fields (NAPF) is one of the three chosen sites, with the other two being the Community North Sports Complex in Downhill and the Ford Quarry Recreation Area in Pallion. These are also the subject of separate planning applications for similar forms of development; please see ref. 17/02294/LP3 and 17/02426/LP3 respectively.

Location and site description

The application site is located on the northern edge of Washington and forms the boundary between Sunderland and South Tyneside/ Gateshead. The site is situated within the Greenbelt and is surrounded by agricultural land to the north and east, the George Washington Golf Course is located to the west and the urban area of Usworth is located to the south. The application site is located near to the A194 and

is well connected to the wider Washington and Sunderland areas. Direct access from Stephenson Road into the site is via an unnamed two way road.

The site is already an existing sports facility with large areas of maintained sports pitches. At present there are three full size grass football pitches, one mid size grass pitch and two rugby pitches. A single storey changing room facility building is located in the south west corner of the site along with a small area of car parking, while a larger but more informal overflow car park is located further to the south. Mature tree plantations surround the site to the north, west and south west with a less substantial tree belt providing the buffer between the sports pitches and existing Washington Riding Centre to the east.

On the matter of the existing Riding Centre, which takes its access off the access into the application site, it does as a consequence suffer from access issues when the NAPF is busy and ad-hoc car parking create access issues for those visiting the Riding Centre. This application proposal therefore incorporates, as stated above, formalised and increased parking areas within the new NAPF facility.

The hubs are to be used for both formal league fixtures on weekends and recreational/ informal football opportunities during the week, with a particular emphasis on mini-soccer, County FA and local pro-club youth development, FA coaching education programmes, the provision of high quality natural turf and artificial pitches, midweek training opportunities for local clubs and optimising school and community usage during off-peak hours.

Five 'Partner' clubs will have priority use of the hub and when not required for their operations, the facilities will be available for the wider community. In this regard, the education rooms within the pavilion will be available to hire for events/ activities such as children's parties, conferences and corporate events. The club room and bar will also be used for occasional club nights.

The opening hours for the hub are proposed to be from 09:00 until 22:45 each day.

As well as existing and proposed plans for the development, the application has been accompanied by a wide range of supporting technical information, including:

- Planning Statement;
- Design & Access Statement;
- Extended Phase 1 Habitat Survey and Bat Survey;
- Preliminary Site and Ground Investigation Reports;
- Flood Risk Assessment and Sustainable Drainage Strategy;
- Transport Statement;
- Visual Impact Assessment;
- Arboricultural Impact Assessment, with Tree Protection and Tree Constraints Plans;
- Noise Assessment;
- Extraction system details;
- Lighting Assessment;
- Floodlighting specifications;

- Supporting Information to AGP proposals;
- Artificial turf specifications;
- Topographical surveys.

The Planning Statement includes details of the public consultation event carried out in respect of the proposals, which involved an exhibition held at the Millennium Centre on the 31 January 2018. The event was publicised by a leaflet drop to residents in the area and comprised a number of display boards manned by Council officers involved in developing the proposals.

Members should note that on receipt of the application, a 'screening' exercise was undertaken to determine whether the proposed development falls within the remit of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and is likely to have such a significant impact on the environment so as to warrant the preparation of an Environmental Impact Assessment (EIA). Following the completion of the screening exercise and having taken into account the relevant selection criteria in Schedule 3 of the Regulations, it was concluded that the development is not 'EIA development' within the meaning of the Regulations and so the preparation of an EIA is not required.

Members are also advised that the application site is wholly within the ownership of the City Council and the application has been submitted by the Council's Executive Director of People Services.

REPRESENTATIONS

Public consultation

A public consultation exercise comprising the issuing of 65 no. letters, the posting of site notices and the display of a notice in the Sunderland Echo has been undertaken.

No representations were received in response to this consultation exercise.

Highways England

No objection to the application proposal.

Sport England

Sport England responded by confirming that they have no objections to the application proposal as it is considered to meet exception E5 of Sport England's Playing Fields Policy.

Sport England has considered the application in the light of NPPF (particularly paragraph 74) and Sport England's policy on planning applications affecting playing fields 'A Sporting Future for the Playing Fields of England'. Sport England's policy to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field, unless one or more of the five exceptions stated in its policy apply.

The application concerns 7.3 HA of playing field which has been used to accommodate a range and number of football pitches over the years. The application proposes the development of 4 no. artificial grass pitches (AGPs) – 3 of which are for football, with the fourth able to accommodate both football and rugby union. One grass football pitch is retained with improved drainage, whilst the existing changing block is demolished and a new changing pavilion/ clubhouse created along with on-site car parking.

The three football specific AGPs at the application site are each designed to the FA's full specification and can accommodate competitive football from 5v5, through 7v7, 9v9, junior 11v11 and adult 11v11. The business model agreed as part of the Parklife agreement provides for their full maintenance and as such (unlike grass pitches) they have the ability to accommodate a significant amount of play without a decline in their quality. The southern-most AGP is shown with both adult football and rugby union markings and this pitch will have a shockpad (beneath its surface) compliant with RFU design specifications so that it is able to accommodate both competitive football and rugby.

Further, Sport England also notes that the FA fully supports this project and it has been prioritised to receive investment via the Parklife programme.

To conclude, Sport England has confirmed there is no objection to the proposed development as it is considered to meet exception E5 of its policy. Furthermore, given the way the project is to be funded and delivered, Sport England do not require any conditions specifying further details on the design or use of the facilities.

South Tyneside Council

South Tyneside Council responded to their consultation request raising no objections in principle, confirming that given the nature of the proposal and separation distances between the application site and the borough of South Tyneside, it is considered that the proposal would have no unacceptable impacts upon the borough.

However, it was noted that given the site's location within the inter-authority greenbelt corridor, it was considered that the Authority should consider the application proposal in line with National Planning Policy Framework (NPPF) Greenbelt policy.

Gateshead Council

Gateshead Council responded to their consultation request by confirming that they have no comments to make.

Tyne and Wear Fire and Rescue Service

No objections to the proposals.

Nexus (Tyne and Wear Passenger Transport Executive)

No objections to the proposals.

County Archaeologist (CA)

The CA stated that no known archaeological features are located on the site but noted that it had never been archaeologically investigated.

The site lies close to a presumed prehistoric enclosure (under the golf course to the west). A prehistoric flint was found in 1977 when the golf course was being created. It is acknowledged that landscaping work to create the existing playing field may have already destroyed archaeological remains; nevertheless, the presence close by of a presumed prehistoric settlement warrants the need for archaeological work to ensure that similar remains are not present on this site.

The CA has therefore requested that archaeological work is required, relating to a geophysical survey and trial trenching, and where remains are found they must be fully archaeologically excavated before development can proceed. Consequently, three conditions have been recommended in the event that Members are minded to approve.

Nexus

Nexus confirmed that they have no objection to the application proposal.

Northumbrian Water

Northumbrian Water assessed the impact of the application proposal on their assets and the capacity within the network to accommodate and treat the anticipated flows arising from the development. Having assessed the planning submission it was considered that it did not provide sufficient detail in respect of the management of foul and surface water from the development for Northumbrian Water to be able to assess their capacity to treat the flows from the development. Consequently, Northumbrian Water requested the following condition be imposed:-

Development shall not commence until a detailed scheme for the disposal of foul and surface water from the development hereby approved has been submitted to and approved in writing by the Local Planning Authority in consultation with Northumbrian Water and the Lead Local Flood Authority. Thereafter the development shall take place in accordance with the approved details.

Reason:

To prevent the increased risk of flooding from any sources in accordance with the NPPF.

Council's Natural Heritage team

The Council's Natural Heritage team initial response confirmed that the application proposal was acceptable in principle but that further information was required before

a recommendation of approval could be made. The additional information centred on the extent of the survey work, measures to mitigate and compensate for the application proposal including landscaping schedules. Following these comments an updated Phase 1 Extended Survey (February 2018) was submitted and its findings accepted by the Natural Heritage team. This matter will be discussed in further detail in the subsequent ecology and trees section of this report.

Council's Public Protection and Regulatory Services (PPRS)

Environmental Health's initial consultation response requested further information be provided in respect of odour control generated by hot food preparation in the kitchen area of the pavilion. It is also requested that additional information be provided to demonstrate that nearby noise-sensitive properties would not be affected by noise from amplified entertainment within the pavilion building.

In terms of lighting impacts arising from the flood/ car parking lighting and land contamination aspects, Environmental Health colleagues in PPRS have advised that following an assessment of the submitted information they have no objection to the application proposal.

These matters will be expanded on in the respective considerations section of this report.

Council's Highways team

No objections to the proposed development. It is noted that the existing access arrangements are to remain, which is considered to be acceptable given that the Transport Assessment submitted with the application demonstrates that Kingsway Road is able to accommodate anticipated traffic flows during times of peak demand.

The proposed car and coach parking at the site meets the FA's requirements and also provides additional capacity to address local requirements; the amount of parking provided is therefore considered to be adequate to cater for the development.

Further advice is also provided in respect of Stopping Up procedures under sections 247 and 257 of the Town and Country Planning Act 1990 (as amended).

Council's Flood and Coastal Team, in role as Lead Local Flood Authority (LLFA)

Further information in respect of the Flood Risk Assessment and Drainage Strategy has only been received at the time of writing the Agenda report. To summarise, the LLFA have confirmed their satisfaction with the amended submission and requested a condition be included that requires the agreement of the final detailed drainage designs prior to the commencement development.

RELEVANT PLANNING POLICY

The National Planning Policy Framework (NPPF) provides the current Government planning policy guidance and development plans must be produced, and planning applications determined, with regard to it. At the heart of the NPPF is a 'presumption in favour of sustainable development' which, as per the advice of paragraph 14, should be seen as a 'golden thread' running through both plan-making and decision-taking. For decision-taking, this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

In order to deliver the sustainable development it seeks, paragraph 17 of the NPPF sets out a series of 12 'core planning principles' which should underpin plan-making and decision-taking. Particularly relevant in this case are the principles that development should:

- Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- Support the transition to a low carbon future, taking full account of flood risk and coastal change, and encourage the re-use of existing resources;
- Contribute to conserving and enhancing the natural environment and reducing pollution;
- Encourage the effective use of land by re-using land that has been previously developed;
- Promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions;
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, focusing significant development in locations which are or can be made sustainable;
- Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs;

Regard should also be given to section 8 of the NPPF, which is concerned with promoting healthy communities, and in particular paragraphs 73 and 74, which stress that access to high quality open spaces and opportunities for sport and recreation can contribute importantly to health and well-being and that existing open

space, sports and recreational buildings and land, including playing fields, should not be built on unless certain circumstances apply.

Section 9 of the NPPF is concerned with the protection of Green Belt land and it stresses (at paragraph 79) that the Government attaches great importance to Green Belts – the aim of policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belt being their openness and permanence. The policies contained within section 9 essentially serve to severely restrict the forms of development which are appropriate in the Green Belt.

These core principles of the NPPF feed into policies EN5, EN12, EN14, L7, CN2, CN3, CN4, WA13, CN17, CN22, B2, T10, T14 and T22 of the Council's adopted Unitary Development Plan (UDP) (1998), which are considered to be relevant to the consideration of this application.

Members should note, however, that paragraph 215 of the NPPF makes clear that due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). Where there is inconsistency between a UDP policy and the NPPF, this will be highlighted by this report and guidance provided as to the appropriate weight to give to the UDP policy in question.

As Members may be aware, on 19 July 2017 the Council's Cabinet approved a Draft Core Strategy and Development Plan (CDSP) for consideration and a public consultation on the first draft ended on 2 October 2017. Pertinently, draft policy HWS3 of the Draft CDSP sets out that the Council will support the development of cultural, leisure and tourism development within the City to enhance and diversify its offer and a list of proposals to be given particular support by the Council is provided – included in this list is the development of new sports hubs at Washington, Sunderland North and Sunderland South as part of the FA's Parklife programme.

In giving consideration to the draft policies contained within the Draft CDSP, regard must be had to paragraph 216 of the NPPF, which states that:

"From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given)
- The extent to which there are unresolved objection to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
- The degree of consistency of the relevant policies in the emerging plan to the policies in the Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)."

With regard to the above advice, clearly the Draft Plan has been prepared after the publication of the NPPF, but the first consultation on the CDSP only expired in late 2017. The weight that can be given to the draft CDSP is therefore limited to the

extent that consideration of the application in question, in terms of the development plan, will be only made using the aforementioned relevant policies within the Council's adopted UDP and with regard to any other material considerations.

Also relevant in respect of this application is 'Sporting Future: A New Strategy for an Active Nation (2015)', a cross-government strategy which seeks to tackle the flat-lining levels of sport participation and high levels of inactivity in the country. Through the Strategy and future funding mechanisms the Government aims to create a more physically active nation and it places a particular focus on grassroots investment.

Regard should also be given to Sport England's 'Towards an Active Nation Strategy 2016-2021', which has been prepared in response to the Government's Sporting Future Strategy and focuses on the benefits that sport participation can bring to people and society, built around a set of five outcomes: physical wellbeing, mental wellbeing, individual development, social and community development and economic development. Public funding will be targeted to deliver these outcomes, hence the Parklife programme.

Finally, the FA's 'National Game Strategy for Participation and Development 2015-19' identifies the key challenges facing grassroots football and seeks to target these challenges with £260 million of investment and the creation of 'hubs' across 30 cities in England. The key areas targeted by the strategy are: boosting participation, developing better players, better training and facilities and football workforce.

ISSUES TO CONSIDER

With reference to the above national and local planning policy background, it is considered that the main issues to examine in the determination of this application are as follows:

1. Principle of development
2. Implications of development in relation to residential amenity, visual amenity and design
3. Impact of development on highway and pedestrian safety
4. Flood risk and sustainable drainage implications of proposed development
5. Implications of development in relation to ecology and trees
6. Implications of development in relation to land contamination

1. Principle of development

Relevant Green Belt policy

As noted previously, the application site lies entirely within the Tyne and Wear Green Belt and so the local and national planning policies which govern development within the Green Belt are applicable. Firstly, it is considered appropriate to reiterate that, as is set out at paragraph 79 of the NPPF, the Government attaches great importance to Green Belts and their fundamental objective of preventing urban sprawl by

keeping land permanently open, with the essential characteristics of Green Belts being their openness and their permanence.

Paragraph 80 of the NPPF goes on to highlight the reasons for land being designated as Green Belt and in this regard, it states that the Green Belt serves five purposes, these being:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other land;

Locally, policy CN2 of the Council's UDP states that a Green Belt will be maintained which will:

- (i) Check the unrestricted sprawl of the built-up area of Sunderland;
- (ii) Assist in safeguarding the City's countryside from further encroachment;
- (iii) Assist in the regeneration of the urban area of the City;
- (iv) Preserve the setting and special character of Springwell village;
- (v) Prevent the merging of Sunderland with Tyneside, Washington, Houghton-le-Spring and Seaham and the merging of Shiney Row with Washington, Chester-le-Street and Bournmoor.

Paragraph 81 of the NPPF is also of relevance in considering the merits of this application – it states that once Green Belts have been defined, local planning authorities should plan to positively enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

In terms of determining planning applications for development proposals within the Green Belt, paragraph 87 of the NPPF states that "...as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".

Paragraph 88 then advises that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

In a similar vein, policy CN5 of the UDP states that care will be taken to ensure that the visual amenities of the Green Belt will not be injured by proposals for development within, or conspicuous from, the Green Belt.

To qualify the guidance of paragraphs 87 and 88, paragraph 89 of the NPPF states that "...a Local Planning Authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- Buildings for agriculture and forestry;
- Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- Limited in-filling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- Limited in-filling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development”.

The list of exceptions provided by paragraph 89 of the NPPF is broadly replicated by policy CN3 of the Council's UDP. There are, however, some subtle differences between the two and in such circumstances, as per the requirements of paragraph 215 the more up-to-date policy guidance of the NPPF should take precedence. In particular, Members should note that whereas paragraph CN3 sets out that proposed facilities for outdoor sport and recreation must be 'essential' so as not to be inappropriate in the Green Belt, paragraph 89 states that such facilities must only be 'appropriate'.

Paragraph 90 of the NPPF states that certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within the Green Belt. These are:

- Mineral extraction;
- Engineering operations;
- Local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- The re-use of buildings provided that the buildings are of permanent and substantial construction; and
- Development brought forward under a Community Right to Build Order.

Similarly, policy CN4 of the UDP states that the carrying out of engineering or other operations or the making of material changes of use are inappropriate within the Green Belt unless they maintain openness and do not conflict with the purposes of including land within the Green Belt.

Consideration of proposals with regard to Green Belt policy

As set out above, paragraph 81 of the NPPF encourages local planning authorities to plan for enhanced outdoor sport and recreation opportunities in the Green Belt. Given that the proposals are ultimately designed to improve the outdoor football facilities available at an established complex and will improve the public recreational

offer of the site, it is considered that, in the broadest possible terms, the development is consistent with the NPPF's land use objectives in relation to the Green Belt.

Furthermore, UDP policy WA13 allocates the NAPF site for new outdoor facilities, recognising it as a main location for pitch sports for Washington. It is also noted, at paragraph 21.50, that any built development would need to take account of the requirements of UDP policy CN3.

New buildings and appropriateness

Paragraph 89 of the NPPF requires that the construction of new buildings (and at this point, Members should note that the definition of 'buildings' provided by section 336 of the Town and Country Planning Act 1990 (as amended) refers to 'any structure or erection', such as floodlights, fencing etc.) for outdoor sport and recreation can be considered as being not inappropriate development where the buildings provide 'appropriate facilities' for outdoor sport and recreation, as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Considering the application in this context, it is noted that the proposed development involves a range of new buildings and structures, including the erection of a pavilion/ changing room building, cycle store, bin store, LPG enclosure, security and ball-stop fencing around the playing pitches, AGPs and associated floodlighting and pathway/ car park lighting columns. In order to establish whether the new buildings are 'appropriate' for outdoor sport and recreation, it is pertinent to consider the role the buildings and structures will play in supporting the wider complex and in this regard, reference is made to Sport England's 'Planning for Sport: Development Management' (guide 3 of 4), which advises that "...the provision of appropriate facilities should include those which help to secure the long-term sustainability of a sports facility, or enhance their quality and/ or accessibility thereby maintaining and increasing participation".

Within this context it is considered that the new pavilion building will primarily support the outdoor sports facilities at the complex and afford the NAPF with improved facilities to cater for players and officials, together with reception facilities, a bar and kitchen, office space and social/ community space. All are considered to represent the type of facilities to be reasonably expected at a sports complex of this nature. Similarly, the proposed floodlighting is required to maximise the use of the AGPs insofar as it allows for play into hours of darkness, whilst the proposed fencing is needed for Health & Safety and security purposes. The other structures such as the cycle store, bin store, the LPG compound and pathway/ car park lighting columns are considered to be minor ancillary features to the wider complex, supporting its day-to-day running and role as a place of outdoor recreation.

Nevertheless, and with specific reference to the proposed pavilion building, regard must also be had to the part of paragraph 89 (i.e. bullet point 4) that relates to the replacement of a building and to this end, it states that any such buildings can only be considered as not being inappropriate provided the new building is in the same use and not materially larger than the one it replaces. Considering this aspect of the

development within this context and on review of the submitted Proposed Site Plan it is clear that the proposed single storey pavilion building; with its footprint of 14.5m by 50m, is materially larger than the existing single storey 15m by 15m pavilion building.

Notwithstanding this aspect of the consideration of the application proposal, it is also considered necessary to assess the application proposal in terms of whether it preserves the openness of the Green Belt and whether the application proposal conflicts with the purposes of including land within the Green Belt.

With regard to the Green Belt's purpose of restricting urban sprawl, preventing the merging of settlements and safeguarding encroachment into the countryside, it is recognised that the proposed development will serve to increase the number of buildings and structures already present at the complex. The proposals do, however, focus development at an established site where buildings and structures already support the existing outdoor sports facilities – the proposals do not, for instance, encroach beyond the established boundaries of the NAPF complex. Furthermore, despite the proposed development, the complex would still be characterised by outdoor sports pitches and expanses of grassed landscaping, tree planting and woodland.

In terms of the Green Belt's role in supporting the regeneration of existing urban areas and while the development does not directly assist in regenerating an established built-up area of the City, the proposals will at least support the significant improvement and revitalisation of an established outdoor sports complex on the urban edge of the City. Lastly, the Green Belt at this location does not perform a function that can be considered as preserving the setting and special character of an historic town and as such, the application proposal is not considered to conflict with the five purposes the Green Belt serves, as per paragraph 80 of the NPPF and policy CN2 of the Council's UDP.

However, and as highlighted previously, paragraph 89 of the NPPF also requires buildings providing appropriate facilities for outdoor sport and recreation to preserve the openness of the Green Belt. Policy CN3 of the Council's UDP also includes such a requirement. In this regard, it is considered that the proposed bin store, cycle store and LPG compound are, as highlighted previously, minor ancillary features, which are located centrally within the complex minimising their impact on openness. It is considered that given their siting, design and size, they will not have an appreciable impact on the openness of the Green Belt.

Nevertheless, as already highlighted, the scale of the proposed pavilion building is relatively substantial. The building will have a width of 14.5m and a length of 50m and as such, a footprint of 725 square metres. When approaching the building's openness impact it is considered that in light of its maximum height of only 4.4m, courtesy of its low profile and mono-pitch roof design, and in view of the fenestration arrangement, which incorporates red brick and grey timber effect panelling, it provides for a contemporary and subtle design solution that should help it blend into its surroundings.

It is also noted that the application proposal involves the erection of 26 no. floodlighting columns, each of which are of a slimline design with a height of 15

metres, in conjunction with 8m and 6m high slimline lighting columns in the car parking and pathway areas. It is also noted that the application proposes extensive lengths of 2 metre high ball-stop and security fencing in and around the grass and AGPs.

In conclusion therefore, given the extent and nature of the proposed buildings and structures it is considered that on the whole the scheme overall will have an impact on the openness of this part of the Green Belt.

In assessing the prevailing characteristics of the site, it is firstly noted that the site lies on the edge of the existing urban area and already contains an existing pavilion building, which is to be demolished as part of the proposal. It is also observed that views into the complex are limited due to it being almost completely surrounded by trees and woodland, which serve to screen and filter the views towards the proposed AGPs and pavilion building. Internally, when approaching from along the access road, the site topography and woodland plantation means the new pavilion building and AGPs are only apparent when almost upon their location.

The proposed floodlighting columns will be apparent in views towards the complex from the identified (two) key vantage points, as is evidenced by the submitted Visual Impact Assessment (VIA), but that their slim line profile and galvanised steel finish will serve to limit their visual presence and ensure their impact on the Green Belt's openness is limited. The VIA illustrate that they will be read against a backdrop that is characterised by the existing plantation woodland and will sit as a background to the existing Washington Riding Centre building and the relatively substantial electricity pylon structure.

The light spillage from the floodlighting (and other lighting to the car park and pavilion building) will also be minimised by the fact that lighting design and output complies with the requirements for Environmental Zone E2 (an area of low brightness, such a village or relatively dark outer suburban location), which in turn ensures the lighting illuminates the pitches rather than the sky, while the pavilion building, with its central location and low profile design means that it will not be visible from the identified long range views.

The security and ball-stop fencing, meanwhile, is largely screened from views taken from outside the complex, and whilst the overall extent of new fencing means it will be readily apparent from within the complex, its lightweight, dark-green mesh design will serve to limit its visual presence and its impact on the openness of the Green Belt. To summarise, it is considered that whilst there will be some impact on the openness of the Green Belt, its openness will, overall, be largely maintained by the adjacent built development and the existing and significant plantation woodland surrounding the site.

Nevertheless and with regard to the above, it is considered that the application proposal will have an impact on the openness of this part of the Green Belt and whilst it is considered that this impact is limited, an impact being identified means that the proposals also give rise to conflict with paragraph 89 of the NPPF and policy CN3 of the UDP in that the openness of the Green Belt is preserved. Consequently, and as per paragraph 89 of the NPPF's advice, the application proposal should be

regarded as inappropriate in this Green Belt location; as per the terms of paragraph 87 of the NPPF, such development is, by definition, harmful to the Green Belt.

To summarise, it has been found that the proposed new buildings for outdoor sports and recreation are inappropriate in the Green Belt on the basis that they do not maintain its openness from the perspective of the provision of facilities for outdoor sport and in view of the fact that the replacement pavilion building will be materially larger than the one it replaces.

Consideration of harm and very special circumstances

Paragraph 87 of the NPPF advises that such inappropriate development should only be approved in very special circumstances, whilst paragraph 88 states that Local Planning Authorities should ensure substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

It is therefore necessary to consider whether the 'very special circumstances' required by paragraphs 87 and 88 of the NPPF exist in this case which are able to outweigh the harm caused to the Green Belt. In this regard, the Planning Statement submitted with the application has sought to demonstrate that 'very special circumstances' exist which serve to outweigh the harm caused by the inappropriate development in the Green Belt.

The Statement firstly provides an overview of the work undertaken to identify prospective sites for the Parklife hubs in 2015. As part of this exercise, 23 potential sites were initially identified, including land owned by the Council, schools and the private sector, and a scoring system reduced the number of sites to six – Community North Sports Complex, Ryhope Recreation Ground, Ford Quarry, Silksworth Leisure Centre, Northern Area or Southern Area (Washington) and Leyburn Grove (Houghton).

A second phase of assessment was then carried out, which used FA modelling criteria to determine future pitch demand and then assessed each of the six sites against specific constraints, namely:

- Flooding and drainage;
- Accessibility;
- Topography;
- Site investigations;
- Utilities;
- Planning status;
- Location;
- Neighbouring uses;
- Site size;
- Need/demand in the area;
- Ecology.

Having considered the six sites against these constraint criteria, Officers from the City Council, the FA, Sport England and the Football Foundation determined that the three chosen hub sites were most suitable, noting that all three have an existing strong football presence and provide a ready-made football market to engage with and deliver the Parklife programme's principles and requirements.

The Statement submitted with the application then goes on to focus on the perceived 'need' for the development; the demand and benefits of the Parklife programme and the wider economic and social benefits arising from the development.

In considering 'need', the Statement highlights that the budget for the City Council's Responsive Local Services (RLS) function has reduced by 48% since 2010. The RLS budget covers the provision and maintenance of grass football pitches and the inevitable result of this budget reduction has been a decline in the pitch maintenance programme, to the extent that in 2016/ 17, the Council maintained 25 fewer grass pitches than in 2014/15 (49 pitches instead of 74 pitches).

The Statement advises that the Football Foundation, Sport England and the Football Association all recognise that Local Authority budget reductions are affecting the quantity and quality of facilities, which in turn is one of a number of factors contributing to a decline in football participation. Programmes such as 'Parklife' have been established to try and arrest this decline. The proposed 'hub' developments therefore represent a proactive drive by the City Council to raise standards of football facility provision whilst reducing the reliance on its budget. The hubs are considered to represent an alternative and sustainable model which will assist in arresting the decline in facility quality and support the growth and prosperity of grassroots football.

In terms of 'demand', the Statement sets out that the pitches at the complex are already well-used, but the site has limited provision and offers very poor changing facilities which do not allow for inclusive use. The complex therefore lends itself to an enhancement of pitches and facilities to permit wider, inclusive participation and a better provision and experience for spectators.

The City-wide demand and need for pitches has been assessed by the Council's Sunderland Playing Pitch Plan (PPP) Needs Assessment (December 2017) and this has identified a significant shortfall in youth and mini-pitches across the City. In particular, there exists a shortfall in pitches suitable for fulfilling the fixtures of the Russell Foster Youth League, which is leading to pitches outside of the City being used. In addition, the PPP has forecast an increased demand for youth football pitches (based on participation and population increases) which can be equated to an additional 39.5 match-equivalent sessions per week across the differing pitch types. The PPP concludes that the level of demand it identifies can be accommodated by the pitch facilities proposed at the three hub sites.

The PPP has also highlighted a shortfall of 10 no. artificial (3G) pitches in Sunderland, based on a current total of 626 youth, adult and veteran football teams (forecast to increase to 657 teams) training once per week on a floodlit 3G surface (such availability being a long-term ambition of the FA) and each 3G pitch being able to accommodate training by 42 teams. This excludes any additional demand for the playing of competitive matches.

In terms of the 'benefits' of improved facilities, the Statement highlights that often, pitches lack the drainage and maintenance required to sustain desired levels of use. Pitches receiving little maintenance or on-going repair will be of poor quality and only able to accommodate a limited number of games and/ or training sessions. Artificial pitches, meanwhile, can offer back-to-back game and training time over a weekend and during the evening and do not require close-season maintenance. Artificial pitches are also durable and are not prone to being unusable during inclement weather. Although the proposed development involves the loss of usable grass pitches, the overall site usage will significantly increase, resulting in greater capacity across the playing season for training and match play and a greater number of playing pitches being marked on the artificial surfaces.

To summarise, there is currently an insufficient supply of full-sized 3G pitches to meet current anticipated future demand based on the FA's training model for football and also demand from other sports (particularly rugby union). The present and future shortfalls identified by the football training model would be met by the progression of the Parklife programme in Sunderland, with the total number of pitches delivered meeting demand and supporting the growth aspirations of the Partner clubs at each hub. To this end, the Statement points to the established Parklife hubs in Sheffield, where every club using the facilities have increased their team numbers to the extent that one club now has a waiting list for members for the first time in its history.

With regard to the 'economic benefits' of the proposed development, the Statement suggests that the provision of high quality leisure facilities will contribute to the attraction and retention of residents and can play a role in assisting in the regeneration of the City by attracting inward investment and contributing to the local and regional economy. In this regard, the Sunderland Parklife proposals will be the first and, potentially, the only one of their kind in the region. The hubs will also provide direct opportunities for local employment and training initiatives. The Statement advises that a new charitable football trust is to be set up to oversee football development in Sunderland, including the hub sites. Any surplus generated by the trust will be reinvested in football across the City.

In terms of the 'social benefits' the Statement highlights the advice of the Government's National Planning Practice Guidance website which, in the 'Health and Wellbeing' section, emphasises the importance of delivering sports and recreation facilities to provide health and recreation benefits for people living and working nearby. Improving the health of the City's population is one of the City Council's key priorities, as highlighted by the Council's draft Core Strategy and Development Plan, and in this regard, Sunderland lags behind much of England in terms of social and economic disadvantage and life expectancy and a greater proportion of the population live with a debilitating condition.

The Statement advises that the Parklife programme represents an opportunity to increase participation in regular physical activity, play, sport and recreation across all age ranges, thereby delivering significant benefits in terms of physical and mental wellbeing. To this end, as part of the Parklife programme, the Council will be required to deliver social outcomes against the five key performance indicators set by the Department for Digital, Culture, Media and Sport (DCMS), which are designed to increase the percentage of the population taking part in sport and physical activity

across all demographics. Furthermore, at each hub, the operator, as guided by the Football Trust, will have responsibility to ensure that the positive social outcomes being sought are being delivered by the clubs and agencies/ charities/ organisations using the facilities it affords.

The Statement concludes by suggesting that the benefits set out above should be taken as representing the 'very special circumstances' sought by paragraphs 87 and 88 of the NPPF to justify the proposed buildings in the Green Belt. The Statement also asserts that the ability of the site to meet identified needs for additional outdoor sport and recreation facilities and the absence of suitable alternative sites on which this need can be met also represents a very special circumstance.

Concluding remarks in respect of Very Special Circumstances

In assessing whether the application proposal represents very special circumstances, it is firstly necessary to consider the level of potential harm the new buildings would cause to the openness of this part of the Green Belt and as set out earlier in this report, the potential harm to openness resulting from the proposed development has been found to be limited. Furthermore, the very special circumstances put forward by the Planning Statement are, meanwhile, considered to be comprehensive and, it is considered, should be given significant weight.

It is considered that the submitted Statement adequately demonstrates that a robust site selection process has been undertaken and the NAPF is one of only three established sites for outdoor sport and recreation within the City that are suitable for accommodating the proposed hub development and delivering the objectives of the Parklife programme. Whilst the application site is within the Green Belt, the proposals do serve to focus development on an existing and established outdoor sports complex.

The Statement then goes on to demonstrate that the proposed hub would have a significant role to play in arresting the decline in quantity and quality of football pitches in the City Council area which, as has been highlighted, has arisen as a result of the Council's diminishing financial resources. The sustainable business model for the operation of the hub would also mean that in the long-term, the burden on public finances will be significantly lessened. In this regard, it is considered that there is a clear need for the development.

The proposals would also serve to address a pressing existing and future demand for improved football facilities in Sunderland, particularly in terms of the numbers of artificial pitches, thus increasing the availability of pitches for both training sessions and competitive matches for clubs and teams across all age ranges and abilities. In this regard, the development would assist in achieving the FA's objectives in terms of delivering access to pitches for regular training.

The social benefits of the proposals are also considered to be significant, in that the provision of the hub will have a key role to play in delivering opportunities for inclusive participation in football across all demographics, thus supporting both local and national objectives to improve the health and wellbeing of the local population by improving opportunities for access to sporting and recreational facilities.

Allied to the above, it is evident that the proposed hub has either the clear specific support of, or would serve to fulfil the strategic aims and objectives of, a series of national bodies, namely the Football Association, Football Foundation and Sport England, and also has the full support of the County FA and the City Council.

Given the above, it is ultimately concluded that clear very special circumstances exist which serve to outweigh the limited harm to the openness of the Green Belt which would potentially arise from the proposed new buildings at the complex. The development involving the erection of the proposed new buildings and structures are therefore considered to comply with the objectives of paragraph 88 of the NPPF in this respect.

Paragraph 88 also requires, however, that 'any other harm' caused by the development must also be outweighed by the very special circumstances identified. To this end, an assessment of other relevant material planning considerations is provided in the following sections of this report.

Consideration of other aspects of development

Up to this point, consideration has only been given to the elements of the proposed development which constitute 'buildings' for outdoor sport and recreation. The proposals also, however, involve other development, including the laying out of new areas of car parking, the surfaces of the new artificial pitches and areas of new landscaping and bunding. These aspects of the proposals must be considered against the requirements of paragraph 90 of the NPPF, which states that certain other forms of development, including engineering operations, are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land in the Green Belt. A similar approach is taken by policy CN4 of the Council's UDP.

With regard to these national and local policy objectives, it is observed that the pitches are intended to be finished with a green-coloured artificial grass and so will appear broadly similar to natural turf pitches that are presently found at the complex. Similarly, the new bunding will be covered by grass so as to appear as naturalistic landforms. As such, it is considered that both the new pitches and the bunding will sit relatively comfortably within the existing landscape of the complex and will not result in harm to the openness of the Green Belt or conflict with the purposes of including the site within the Green Belt.

The Statement submitted with the application advises that the final material to be used for the areas of new car parking will be informed by recommendations made in respect of sustainable drainage arrangements for the site, but it is nevertheless anticipated that car parking bays will be constructed from porous paving or a form of grasscrete. The use of grasscrete would, it is considered, serve to limit the visual impact of the relevant car parking area, but in any event, it is considered that the provision of any form of hard surfacing to accommodate the car parking would not materially harm the openness of the Green Belt at this location given the situation of the car parking within the complex, its proximity to the other buildings/ development within the site and it being screened from external views into the site by existing

woodland, trees and landscaping. Nor would this development conflict with the purposes of including the site within the Greenbelt.

Given the above, it is considered that the 'other' development proposed in respect of this application is appropriate in the Green Belt, having had regard to the guidance provided by paragraph 90 of the NPPF and policy CN4 of the Council's UDP.

Playing pitch/ open space policies

With regard to development involving sports and recreation, paragraphs 69, 70 and 73 of the NPPF stress the role the planning system can play in creating healthy, inclusive communities and providing access to high quality spaces and opportunities for sport and recreation. Paragraph 74, meanwhile, states that existing playing fields should not be built upon, unless: they are surplus to requirements; the loss would be compensated by equivalent or better provision in terms of quantity and quality in a suitable location; or, the development is for alternative sports and recreational provision. This approach in respect of development affecting playing field land is broadly echoed by policy L7 of the Council's UDP.

Sport England is the statutory consultee on development proposals affecting playing fields, and to provide a detailed policy framework with which to consider such proposals, it has produced a Planning Policy Statement, entitled 'A Sporting Future for the Playing Fields of England - Policy on planning applications for development on playing fields'. Sport England's general position is that it will oppose development which results in the loss of playing fields, in all but exceptional cases where one of a list of specific circumstances outlined in the policy statement is applicable.

The application concerns 7.3 HA of playing field which has been used to accommodate a range and number of football pitches over the years. The application proposes the development of 4 no. artificial grass pitches (AGPs) – 3 of which are for football, with the fourth able to accommodate both football and rugby union. One grass football pitch is retained with improved drainage, whilst the existing changing block is demolished and a new changing pavilion/ clubhouse created along with on-site car parking.

The three football specific AGPs at the application site are each designed to the FA's full specification and can accommodate competitive football from 5v5, through 7v7, 9v9, junior 11v11 and adult 11v11. The business model agreed as part of the Parklife agreement provides for their full maintenance and as such (unlike grass pitches) they have the ability to accommodate a significant amount of play without a decline in their quality. The southern-most AGP is shown with both adult football and rugby union markings and this pitch will have a shockpad (beneath its surface) compliant with RFU design specifications so that it is able to accommodate both competitive football and rugby.

In addition to the above, as noted previously, the proposals have the full support of, or assist in achieving the policy objectives of, a range of bodies involved in the promotion of football and wider sports participation, including Sport England, the FA and the Football Foundation.

Given the above, it is considered that the implications of the proposals in relation to playing pitch policy are acceptable and the proposals satisfy the objectives of paragraphs 69, 70, 73 and 74 of the NPPF and policy L7 of the Council's UDP.

Conclusion in relation to principle of development

The proposed development has been given careful consideration in respect of the relevant local and national land use policies. For the reasons set out above, it is ultimately considered that the application proposal satisfactorily addresses national and local policies that govern development in the Green Belt. The development also complies with the relevant policies relating to sports and playing pitches. In conclusion therefore, it is considered that the principle of the development is acceptable in land use terms and in accordance policy UDP policy WA13.

The proposed development does, however, raise a range of other material planning considerations, which are considered in more detail below.

2. Implications of development in relation to residential amenity, visual amenity and design

The core principles of the NPPF place a clear emphasis on delivering high standards of design and amenity. To this end, section 7 of the NPPF sets out a requirement for 'good design', with paragraph 56 advising that the Government places great importance to the design of the built environment and that it is indivisible from good planning. Paragraph 64, meanwhile, states that planning permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area.

On a local level, policy B2 of the UDP requires new development proposals to respect and enhance visual amenity, encouraging a high standard of design to new buildings, and to maintain acceptable standards of amenity for existing residential dwellings.

In addition to the above, policy EN5 of the UDP states that where development is likely to lead to increased noise levels in sensitive areas, an appropriate assessment should be carried out, with mitigation measures incorporated into the development where necessary.

Design considerations

The submitted Design and Access Statement (DAS) explains that the proposed pavilion and associated buildings have been positioned to the centre of the site in order to maximise the layout available for pitch allocation. The DAS also confirms that pavilion will include accessible facilities as per DDA requirements. The DAS then details that the appearance of the pavilion has been designed to offer a quality controlled solution for a long lasting, secure and contemporary building. The slender mono-pitch roof gives the building a modern silhouette, and the use of smooth red multi brick and grey timber effect panelling reflects the material pallet for the adjoining Washington AFC changing room pavilion.

The pavilion has the potential to become an integral part of the community through the availability of education and training in football coaching in the multifunction coaching space which can also be leased in the evenings by local groups to hold yoga and other group classes. The inclusion of the social space creates a new café where family members can wait and watch games while enjoying a coffee, or local clubs can hire the combined spaces to host award ceremonies and fundraising functions.

Reviewing the submitted plans it is evident that the majority of the new development proposed, such as the security and ball stop fencing, floodlighting, artificial pitches etc. are functional in nature. Nevertheless, where possible, it is clear that steps have been taken to ensure its visual impact is minimised – for example, a green mesh will be used for the fencing and the floodlighting columns are to be slim and coloured light grey.

The landscaping proposals will help to soften and enhance the introduction of the new and significant sporting infrastructure via new tree, shrub and ornamental planting. The new landscaping proposals and grass mounds will assist in the application proposal more readily integrating into its surroundings, in particular the significant plantation woodland that surround the site.

Noise considerations

A noise assessment has been undertaken by Acoustic Consultants Ltd (December 2017) to support the application and identify any adverse impact on noise sensitive receptors. The noise assessment indicates that noise associated with the operation of the proposed development is not anticipated to have a significant adverse impact on nearby noise sensitive receptors.

Extensive noise measurement were made to quantify the existing noise climate at the proposed site and surrounding area to enable a comparison with the predicted development borne noise levels, and assessment of any impact. Colleagues in PPRS noted Table 11 of the submitted Noise Assessments, as it detailed a calculated only an increase of 1 dB in the background noise level following the use of the proposed sports pitches between the hours of 19:00-22:00 i.e. when the noise climate is deemed to be the most sensitive. PPRS also noted that a noise management plan has been proposed to manage noise issues which cannot be designed out of the scheme, such as swearing and anti-social behaviour.

An assessment was also undertaken to assess the impact of plant noise on existing residential receptors. It is recommended that during the daytime (07:00-23:00) plant noise should not exceed a rated noise level of 44dB LAeq,t and 39dB LAeq(1hr) at night to ensure that noise from any external plant does not exceed background noise levels. Should Members be minded to approve colleagues in PPRS have recommended that this be stipulated via the imposition of a condition.

Car Park noise has also been assessed as it has been deemed more people could be using the sports centre at sensitive times 19:00-22:00. Table 12 of the Noise Assessment shows measured car movement operational noise levels (1 minute). Noise from anticipated use has been predicted using noise modelling software. This

has predicted that noise generated by use of the car park will not exceed 27dB LAeq (1hr) at the façade of the nearest residential premises. This is deemed to be less than 1dB change in the existing noise level and will therefore be seen as having no observed effect level on the existing noise climate.

However, following a review of the noise assessment work it was noted that the bungalow at the Washington Riding Centre appeared to have not been considered in the noise assessment work. At the time of writing the Agenda report clarification was being sought from the Applicant in this regard. It has been indicated that additional noise attenuation may be required to mitigate noise impacts from the application proposal on the bungalow at the Riding Centre. The attenuation could be in the form of an acoustic fence/ barrier. It is considered that in order to ensure an appropriate assessment of noise impacts, as well as appropriate consideration the Green Belt impact of any required structure, a Late Sheet report will be tabled at the Committee meeting. It is nevertheless considered that the consideration of this aspect of the development is not insurmountable and that an appropriate form of the development can be achieved.

Notwithstanding the above aspect of the proposed development PPRS have recommended conditions that should be included should Members be minded to approve the application. The conditions will require the Applicant to undertake a validating noise monitoring assessment to ensure the application's noise assumptions are correct. A noise management plan condition in order to prevent the potential for disturbance to local residents and, in view of the kitchen/ bar and social spaces within the proposed pavilion building, a condition that requires, prior to occupation, a detailed noise assessment and accompanying noise management plan to ensure that any noise emanating from the playing of live and/ or recorded music does not give rise to complaints.

Lighting considerations

A lighting specification report and assessment has been provided in support of the submission. The report confirms that 26no. 15m high octagonal steel masts are proposed to be installed.

The lighting assessment has categorised the site as falling within Environmental Zone 2 – 'Rural, low district brightness e.g. village or relatively dark outer suburban locations', as defined in the Institute of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Light GN01. On this basis the lighting assessment has advised that the light intrusion to the closest residential receptors are below the threshold for E2 areas and as such does not create an unacceptable impact as a result of artificial lighting.

The assessment advises that control switches and time clock should be fitted to the flood lights to ensure that they do not remain on any later than the permitted curfew hour (22:00hrs) and therefore mitigate any impact to the surrounding environment.

PPRS colleagues have reviewed the planning submission and have offered no objection to the application proposal and agree with the recommendation of the assessment in control switches and time clocks pre-programmed including a

seasonal change over facility for BST and GMT should be installed to the flood lights to ensure they do not remain switched on any later than 22:00.

Odour considerations

Comments from PPRS highlighted that the kitchen extraction information to not be sufficiently detailed to enable a recommendation to be made at the present time. Consequently PPRS advised that an odour risk assessment should be provided to demonstrate that the odour abatement specification will be adequate for the pavilion's location, type of food cooked and proximity of sensitive receptors. Given the central location of the pavilion building within the site and its distance from nearby neighbouring uses, particularly the Washington Riding Centre and in the event that Members are minded to approve it is considered that this could be included as a condition, one that requires the submission and agreement of information prior to the operation of the development.

With regard to the above comments, it is considered that the implications of the proposed development in respect of residential amenity, visual amenity and design are acceptable. The proposed development therefore accords with the requirements of policies B2 and EN5 of the UDP and the core principles and paragraphs 56 and 64 of the NPPF in this regard.

3. Impact of development on highway and pedestrian safety

Section 4 of the NPPF promotes sustainable transport, with paragraph 32 stating that development proposals which generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Decisions should take account of: whether opportunities for sustainable transport modes have been taken up; whether safe and suitable access to the site can be achieved for all people and; whether improvements can be undertaken within the transport network that cost-effectively limit the significant impacts of the development. Development should only be refused on transport grounds where the residual cumulative impacts of the development are severe.

On a local level, policy T14 of the UDP states that new development proposals must not give rise to conditions which are prejudicial to highway and pedestrian safety, whilst policy T22 requires new development to be afforded an appropriate level of dedicated parking. Meanwhile policy T10 requires the Council, in part, to upgrade existing path routes and identify new ones, as well as adapting some for use by a variety of users.

The proposed car park is to be accessed off a private access. Retaining the existing junction arrangement is considered appropriate. Peak demand for use of this access can be accommodated within existing traffic flows on Stephenson Road.

The submitted Transport Assessment has highlighted that there are insufficient car parking spaces within the existing site and the neighbouring Washington AFC, which is exacerbated further by the lack of appropriate parking within the Stephenson Industrial Estate and employee parking within the NAPPF. As a consequence, an

integral element of the application proposal has been the delivery of 321 car parking spaces, which include 13 accessible and 4 coach parking bays. Furthermore, a cleared area in the Council's ownership to the west of the access road will also be available for further overflow parking as and when required.

Electric Car charging points will initially cater for 2 bays, with the capacity to increase the number to 10, while secure parking for 20 cycles is also to be provided adjacent to the pavilion building.

The materials for the car park have been informed by the surface water drainage requirements at the site, whilst also recognising that the site's location within the Greenbelt. As such, car parking bays will be a mix of porous paving and grasscrete. The Proposed Site Plan confirms that grasscrete will be used for the southern-most car parking area. This car park has been identified as the overflow car park and as such, will not be as heavily used as the other two areas. As a consequence, these two parking areas are those that will be surfaced in a permeable material, thereby positively managing the surface water at the site.

The submitted Planning Statement has highlighted that through discussions with the neighbouring Riding Centre it has become apparent that there has been a long standing issue with the access to the Centre, it is currently served by one un-adopted private lane with no passing places and poor visibility, which is then exacerbated by the lack of adequate parking provision at the NAPF. Consequently, the application proposal is to include two passing places within the site boundary to allow the more fluid movement of traffic from the approach road to the "Hub" from Stephenson Way and the Riding Centre.

The Planning Statement also explains that the perimeter of the site is bound by an established bridleway which has not been formally recognised. The application proposal is seeking to formalise this bridleway as part of the development via the following improvements:-

- 6m width (falling to minimum 5m at pinch points) mown grass
- Provision of access control to bridleways at the south east and south west entrance points. Access control will be provided in the form of wooden barrier features comprising an A-frame, buggy hoop and access gate to ensure access is afforded to cyclists, horse riders and pedestrians. The access points will also provide adequate clearance for grass cutting equipment.

Engineering colleagues have noted the inclusion of the bridleway as part of the application proposal around the west, north and east sides of the site will mitigate loss of access across the site, but a defined east-west route needs to be included. If this is along the single carriageway bitmac road which leads to the Washington Riding Centre, the proposed passing places will be important to allow users to pass.

Engineering colleagues have highlighted that as the track to the riding school has at present no recorded public access status it will be imperative that bridleway rights are formally dedicated along the track as they would complete the proposed circuit route. For Member information the dedication process will be administered and

implemented by the Local Highway Authority under appropriate powers. Consequently, should Members be minded to approve, this can be relayed to the Applicant via an informative on the decision notice.

4. Flood risk and sustainable drainage implications of proposed development

Paragraph 103 of the NPPF states that when determining planning applications, Local Planning Authorities should ensure flood risk is not increased elsewhere and should only consider development to be appropriate in flood-risk areas where certain criteria are satisfied. Meanwhile, policy EN12 of the UDP states that in assessing development proposals, the Council will seek to ensure that the proposal will not materially impede the flow of flood water, or increase the number of people or properties at risk of flooding.

As Members may be aware, the City Council is now the Lead Local Flood Authority (LLFA) in respect of major development proposals, with responsibility for matters pertaining to the management of surface water. A Ministerial Statement from the Department for Communities and Local Government (dated 18th December 2014), to be read in conjunction with the policies of the NPPF, sets out that the Government expects decisions on planning applications relating to major development to ensure that sustainable drainage systems (SuDS) for the management of run-off are put in place, unless this is demonstrated to be inappropriate.

In considering planning applications, the LLFA should be satisfied that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. Technical Guidance produced by DEFRA (March 2015) sets out non-statutory technical standards for SuDS and this should be used to inform the preparation of a SuDS scheme in association with a development proposal. In this regard, it is recommended that the surface water run-off rate for new development should not exceed the existing greenfield run-off rate for the site.

As set out in the 'Representations' section of this report, matters relating to flood risk and the sustainable drainage strategy for the site are still being given consideration. It is anticipated that the proposals will be found to be acceptable in relation to these matters. An appropriately detailed update will be provided to Members by way of a Late Sheet report.

5. Implications of development in relation to ecology and trees

Section 11 of the NPPF sets out a general strategy for the conservation and enhancement of the natural environment, and it advises that the planning system should recognise the wider benefits of ecosystem services and minimise impacts on biodiversity and provide net gains in biodiversity where possible. Meanwhile, policy CN22 of the UDP states that development proposals which would adversely affect any animal or plant species afforded special protection by law, or its habitat, will not be permitted unless mitigating action is achievable.

With regard to trees, paragraph 118 of the NPPF states that planning permission should be refused for development resulting in the deterioration of irreplaceable habitats, including ancient woodland and the loss of aged and veteran trees found outside ancient woodland, unless the need for, and the benefits of, the development in that location clearly outweigh the loss. Policy CN17 of the UDP, meanwhile, encourages the retention of trees which make a valuable contribution to the character of an area and the retention of trees, hedges and landscape features in all new development will be required where possible.

In respect of Habitats Regulations Assessment (designed to assess the effect of development on the European-protected sites along the Durham and Northumberland coast), the nature and location of the proposed development are such that as the competent authority, the Council's Natural Heritage team could not record a likely significant effect from construction or operational phases of development on the key features of the coastal sites and as such, there is no requirement for a Screening Opinion or Appropriate Assessment.

On first review of the application submission and as set out in the 'Representations' section of this report, the Council's Natural Heritage team requested further information be submitted as it was considered by them that the initial Phase 1 Survey appeared to not have been properly surveyed the site, most notably the where works and operational development might impact on the River Don catchment (water vole, otter, kingfisher).

It was considered that as the application proposal would result in the loss of greenspace and habitats to hardstanding and other artificial and built structures, and given proposed external lighting and noise impacts, additional information and clarification was needed in terms of the proposed measures to mitigate and compensate these effects. In particular, detail on the opportunities to improve woodland and grassland habitats, creation of scrub and wetlands and the provision of bat and bird roosting units.

It was also requested that a landscaping schedule be submitted for consideration, one that would seek habitat creation and management on and off-site to compensate and integrate the ecological and amenity features of the site and surrounding area.

Following these comments and the subsequent submission of the Extended Phase 1 Survey (February 2018 V4) by Durham Wildlife Services and accompanying landscape proposal, the Natural Heritage team have now confirmed that they are satisfied that the ecology survey work has addressed the entirety of the site. On this basis it has been recommended that should Members be minded to approve the development that the recommendations summarised in the report (5.0 Conclusion and Recommendations) should be implemented as part of approved development, subject to finalising landscape and ecological design details and before works commence on site. The details to be agreed will be expected to include on and off site improvements to existing woodland, hedgerows, trees and wetland, grassland and scrub creation, bat and bird roost and nest units in buildings, and a long-term maintenance schedule to sustain habitats and features in favourable condition.

The application proposal was also supported by an Arboricultural Impact Assessment (AIA). Following an assessment of the proposed works, the AIA confirmed that there are no tree removals to be carried out and only a very small chance that any tree crown pruning will be required. Some tree protection fencing has been recommended but this is primarily used to protect scrub areas and boundary trees from soil stacking or changes in levels due to soil forming within the site to accommodate the pitches. Once the perimeter fencing has been installed then this fencing can be removed.

The Applicant's AIA confirms that the contractors involved in the works will be made aware of the impacts of their actions on trees and they will be required to provide method statements dealing with any potential impacts when working near or within the Root Protection Areas of the retained trees. Furthermore, the AIA confirms that in order to minimise the potential for damage to trees the protective measures specified within this report should be followed and guidelines contained within BS5837:2012 and NJUG Volume 4 should be followed. Consequently, should Members be minded to approve it is recommended that the development shall be carried out in accordance with Sections 6 – 10 of the submitted AIA and the accompanying appendices and plans.

Subject to the suggested conditions, it is considered that the implications of the development in relation to ecology, biodiversity and the trees at the site are acceptable, in accordance with the objectives of the NPPF and policies CN17 and CN22 of the UDP.

6. Implications of development in relation to land contamination

Paragraph 121 of the NPPF advises that planning decisions should ensure that a development site is suitable for the new use, taking into account ground conditions, land instability and hazards from previous natural and human activity, and that any hazards are properly understood and contaminated land remediated where appropriate. Policy EN14 of the UDP states that where development is proposed on land where there is reason to believe is contaminated or potentially at risk from migrating contaminants, the Council will require the applicant to carry out adequate investigations to determine the nature of ground conditions below and, if appropriate, adjoining the site. Where the degree of contamination would allow development subject to preventative, remedial or precautionary measures within the control of the applicant, planning permission will be granted subject to conditions specifying the measures to be carried out.

The application has been accompanied by Phase I & II Site Investigation reports, which has been considered by the Council's Environmental Health team, who have advised that the application site does not appear to offer any significant grounds for concern in terms of impact on human health or controlled waters. The Environmental Health team has recommended, however, that conditions be imposed which require the applicant to prepare an updated Phase II Investigation, Remedial Strategy/ verification plan and Verification Report (as required), in addition to a condition for dealing with unexpected contamination.

Subject to such conditions, it is considered that the implications of the proposed development in respect of land contamination at the site are acceptable, in accordance with the objectives of paragraph 121 of the NPPF and policy EN14 of the UDP.

CONCLUSION

The proposals have been assessed with careful regard to the national and local planning policies which govern development in the Green Belt. For the reasons set out above, whilst some harm to the openness of the Green Belt has been identified, it is considered that this is outweighed by the very special circumstances which apply to this particular development proposal, given that the proposals relate to an established site and given the clear benefits it will bring in terms of delivering improved facilities for outdoor sport and recreation and supporting increased participation in football in the City. In assessing this matter, it is acknowledged that the proposals have the direct or indirect support of a range of national bodies with an interest in increasing participation in football or sport more widely.

The principle of the development in land use terms is therefore considered to be acceptable.

In addition, for the reasons discussed above and subject to the imposition of appropriate conditions as recommended throughout the report, the proposals are considered to be acceptable in respect of matters relating to visual and residential amenity (including in relation to noise, lighting and odour pollution), highway and pedestrian safety, ecology and biodiversity, trees and land contamination.

The proposals are therefore considered to comply with the requirements of the core principles and relevant paragraphs of the NPPF and policies EN5, EN12, EN14, L7, CN2, CN3, CN4, WA13, CN17, CN22, B2, T10, T14 and T22 of the Council's UDP in relation to these matters.

Matters relating to the sustainable drainage arrangements and noise attenuation associated with the proposed development are, however, still being given consideration by the relevant Council officers. It is anticipated that this matter will have been addressed satisfactorily ahead of the Committee and Members will be provided with an update on the situation via a Late Sheet report. The Late Sheet report will also provide details of a recommended decision and a full list of recommended conditions.

It is nevertheless anticipated that the recommended decision to be made on the Late Sheet will be that Members Grant Consent for the proposed development. In the event this is the case and in the event that Members agree with such a recommendation, it should be noted that in accordance with the provisions of the Town and Country Planning (Consultation) (England) Direction 2009, the application will have to be referred to the Secretary of State given that the proposals involve development which has been found to be inappropriate in the Green Belt and which would have a significant impact on its openness.

EQUALITY ACT 2010 - 149 PUBLIC SECTOR EQUALITY DUTY

During the detailed consideration of this application/proposal an equality impact assessment has been undertaken which demonstrates that due regard has been given to the duties placed on the LPA's as required by the aforementioned Act. As part of the assessment of the application/proposal due regard has been given to the following relevant protected characteristics:-

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

The LPA is committed to (a) eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

In addition, the LPA, in the assessment of this application/proposal has given due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This approach involves (a) removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The LPA has taken reasonable and proportionate steps to meet the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities, as part of this planning application/proposal.

Due regard has been given to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves. Particular consideration has been given to the need to:-

- (a) tackle prejudice, and
- (b) promote understanding.

Finally, the LPA recognise that compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

RECOMMENDATION:

Minded to Grant Consent under Regulation 3 of the Town and Country Planning General Regulations 1992 (as amended), subject to satisfactory resolution of the noise considerations of the proposal in respect of the Washington Riding Centre and the consideration of the recently submitted Flood Risk Assessment and Drainage Strategy, and subject to conditions covering the following, all of which will be reported to Members by way of a Late Sheet:

- Development to commence within three years;
- Development to be carried out in accordance with the approved plans;
- Details of the LPG store;
- Archaeological excavation and recording;
- Archaeological post excavation report;
- Archaeological publication report;
- Land contamination conditions (Phase II, Remediation, Verification, unidentified contamination);
- Submission of final details of surface and foul water drainage arrangements;
- Submission and agreement of all external materials;
- Submission of final hard & soft landscaping proposals, including ecological enhancement measures;
- Landscaping to be undertaken within 5 years;
- Submission of biodiversity enhancement measures;
- Adherence to Section 5.0 of Extended Phase 1 report;
- Adherence to Sections 6 – 10 of the Arboricultural Impact Assessment;
- Condition stipulating hours of operation (09:00 – 22:45, Monday – Sunday);
- Submission of noise validating report;
- Submission of noise management plan – external activities;
- Submission of noise assessment and management plan – internal pavilion activity e.g. live and/ or recorded music;
- Flood lighting control – operational no later than 22:00 hours;
- Submission of ventilation & extraction system and odour risk assessment.