

Blackbridge Committee



Planning Ref: 23/00103/FUL

To Whom it May Concern

As a committee representing the local community who live near or who regularly use the Blackbridge field (665 people have signed a petition which has been given to the Planning Department by a member of the Committee 15.3.23), we are writing with our objections as follows:

- **Consultation**

Re: Statement of Community Involvement.

Most of the local population did not know of the proposals to develop the site until the summer of 2022 and after the second consultation had closed. 60 feedback forms were returned. The majority of people were against the development. The majority of people not expressing a view one way or the other should not be concluded that they are in favour of the development. No further surveys have been carried out despite it being clear that most people are not in favour of the development. The proposal is within a corner of Podsmead, other areas that surround Blackbridge were not consulted at all despite being closer than much of Podsmead.

- **Cover Letter accompanying the application**

The cover letter accompanying the planning application requests that the development is broken down into 2 phases and states that the second phase will only occur if adequate funds are available. Phase 2 of the development is the only part of this development which preserves and enhances the current uses of Blackbridge field. The 3G pitch proposed is on the site of a natural football pitch currently in use. Whilst we oppose the 3G pitch entirely, if it is to go ahead then we believe that 'Phase 2 should be completed first, and only then should phase 1 be allowed to commence.

Reason: to ensure that current community sports use of the site is preserved.

- **Traffic**

It is stated in the application form that the hours of opening are unknown, we therefore fail to see how the Transport Statement can accurately assess the impacts of the development.

There are 86 parking places, which means all these vehicles need to drive down Laburnum Road twice per visit so two traffic movements per person. Some vehicles will be dropping off and picking up which equates to 4 traffic movements per person.

This will not occur by some formula as used in the Transport Statement, but instead be concentrated around the start and end of matches held on the pitches and also around events and closing times of the hub. None of this is dealt with sufficiently within the Transport Statement.

The road is not wide enough for the amount of extra traffic, especially at a time when one match is ending and another beginning.

Podsmead Road is already busy especially at the start and end of the Crypt School day.

The junction from Laburnum Road onto Podsmead Road will be dangerous with extra traffic.

There is no pedestrian crossing for Tuffley Park, which will be especially dangerous for children using the play area.

The extra traffic will lead to an increase in vehicle emissions, particularly down by the play area whilst vehicles wait to join Podsmead Rd.

• **Noise Pollution**

It is stated in the application form that the hours of opening are unknown, we therefore fail to see how the Noise Assessment can accurately represent the impacts of the development.

The current noise survey is sub-standard and fails to recognise the cumulative noise impact that the development will have upon the local residents. The background readings taken near these residences have been checked and we agree that they are around 40 to 42dB on an evening, however, it is non-intrusive white noise of distant traffic creating this.

The 3G pitch has been assessed on its own as though it operates in a separate time and space to the hub, the car park and the road traffic. Wherever the numbers have been too high mitigation has been suggested such as not using whistles or using fences that will cushion ball impacts. It is unclear how a game of football can take place when the rules are written around the blowing of a whistle. We have attempted to find out how this would work and have not found any references to football games being played without a whistle. It is also unclear if any of these mitigating measures will be acted upon or will be written into the planning permission.

A 3G pitch was built in Welwyn Garden City by the local council, the noise complaints that it generated due to shouting, swearing and whistles etc. led the Council's own Environmental department to prohibit its use. The same is likely to happen here resulting in a white elephant of a sports facility built on currently cherished land.

The assessment of parking at the hub is far from reality, it appears to be based on one car at a place of work rather than dozens of excitable young people having just played

a game departing en masse. Councillors need to go to St Peters School between 21:30 and 22:00 on Tuesday to get a true picture of potential levels. We purchased a calibrated decibel metre and took readings whilst players arrived at St Peters, at a distance representative of the hub carpark to the nearest residences. Background levels were similar to Blackbridge, however we had many peak readings over 70dB a couple over 80dB, one of 85.5dB in half an hour. The players at these matches are generally young men who like to announce their arrival in their cars and vocalise everything at maximum volume. Whilst we are not saying ours is a thorough assessment, it demonstrates the shortcomings of the noise assessment within the application.

We could find no supplementary planning guidance for Gloucester for noise and carparks. Ealing's SPG 10 does provide guidance on the subject and states:

Breakout of impulsive noise from patrons and associated vehicles and delivery vehicles (other than those vehicles falling within the remit of BS4142) – Criteria for sleeping and resting. L_{Amax,1hr} (fast response) noise level for [car engine starting] [manoeuvring] [door slams] [[other], shall not to exceed the following criteria:-

55 dBA at 3.5 m from the nearest façade of the nearest affected dwelling during the period 1900 to 0700 hrs, where greater than 15 noise events are predicted during the period and/or low background noise levels prevail, a combination of noise and vibration is produced and sources with significant low frequency content are present.

We believe that given the proximity of the car park and Hub to housing, in combination with the noise from the pitch, that there is no way the noise will be kept lower than 60dBA at 3.5m from the nearest dwelling.

We believe that the full noise impact of this development will have a **Significant Observed Adverse Effect Level** during the hours of operation, given the current quiet nature of the area. The houses nearest to the Hub, Road and pitch will have prolonged intense periods of noise from all 3 sources at once that will extend late into the evening/night until all people have changed and departed.

• Light Pollution

We were assured that lighting for the pitch would be low level. In the plans the floodlights are 15 metres tall.

The development will lead to the loss of one of the only dark skies in the city area which goes against the agenda for the All Party Parliamentary Group For Dark Skies.

Loss of public view: Floodlighting will ruin the sunset views and the views of Robinswood Hill. In the summer there are often many people sat on the area now proposed for housing waiting for the sun to set. This vantage point must be one of the best accessible spaces for this view in the city and should not be spoilt with lighting masts.

The 15 metre pitch flood lighting and lights from the building and car park, will adversely affect the bat population which feed on the insects that are in the natural

grass in the summertime. This will further compound the loss of insects for the bats as no insect lives on plastic and rubber crumb.

- **3G Pitch (see attached report)** *already emailed*

As a committee we have done extensive research on 3G pitches from scientific papers rather than pressure group objections. We have not spoken to anyone in the local community who is in favour of the 3G pitch and indeed it goes against Gloucester City Council's Policy of Sustainability.

- **Existing Plan**

This is misleading as it does not show the existing the football pitches that are already there and in use. The new plans propose to take these away. These are currently used by local football clubs and the Rugby club, benefitting local children.

- **Wildlife**

On the planning application, the applicant has stated there are no protected species, either on or surrounding the site. This is contrary to the Ecological Appraisal Document with the application.

- **Balancing Ponds and Safety**

The proposed balancing ponds and drainage assessment does not take account of the proposal for residential housing despite the proposal for residential housing using the same balancing ponds for the required SuDs. Should both proposals go ahead then much larger balancing ponds (Hydrological brakes) would be required. It would have been less deceptive to have included the two proposals in a single planning application so that the true impact of the combined scheme was apparent to the public and planners.

Balancing ponds according to RoSPA should not be located near play areas unless they are fenced or have other mitigating measures. This will lead to the effective loss of the area to the public or be a risk to children who have previously played safely in this area.

We have been informed verbally by a Councillor that the balancing ponds will not be fenced in.

- **Anti-social behaviour**

Litter is always a problem at sports venues and this will get worse. Currently the small amount of litter is not picked up. Locals are worried about out of hour drug taking, noisy behaviour and car/moped movements.

To conclude, the local population are not in favour of this development for the above reasons.

They would like the field to remain a natural open green space so it can be used as they are currently using it. There are many more environmentally beneficial, lower cost ways it could be enhanced with more tree planting and wildlife meadows for example, which would be of benefit to ALL. This development will be taking away an irreplaceable asset from the local Community and imposing it with an unwanted and unsustainable alternative.

Committee Member Signatories:

