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cc Ms Desi Reed (Principal Planner)

7th January 2009

Relocation of Lowestoft and Yarmouth Rugby Club Selection of Preferred Site 190

This letter expresses the views of the Committee of the Gunton Woodland Community Project by objecting strongly to the selection of Site 190 (known locally as the Church Field) as a “preferred site” for the relocation of the Lowestoft and Yarmouth Rugby Club.

Our reasons for this will be presented below under three separate headings...

1. Shortcomings of the Public Consultation exercise.
2. Problems associated with Site 190.
3. Our recommendations for alternative sites.

Firstly, as background information, we would point out that since our Group was formed in 1998 we have completed well over 20,000 volunteer hours rehabilitating Gunton Wood to what it is today. Now an established Local Nature Reserve, it is enjoyed by large numbers of residents and visitors to Lowestoft and, as Managers, we have a prime responsibility to ensure that nothing is done to spoil the wildlife balance and bio-diversity attractions of the wood that we have spent the last 10 years carefully nurturing.

Secondly, we would like to emphasise that we are not against the principle of the Rugby Club moving to a new area since they have clearly outgrown their present base at Old Lane. Indeed, we would strongly support their ambitions to provide more extensive facilities, particularly for youngsters. But it is important that the best possible location is chosen for the relocation.

Thirdly, a comment on the ownership of Site 190 may be of help. In a conveyance signed by Georgiana Fosbery dated 22nd October 1963 the land was given to the Gunton Parochial Church Council to act as Trustees in conjunction with the Norwich Diocesan Board of Finance. There are several covenants in place controlling the future use and disposal of the land.

1. Consultation Procedure

1.1 The first knowledge that we had of the Church Field being chosen as a “preferred site” was the posting of a Notice on site on 14th November. From subsequent correspondence WDC have informed us that, since new Planning Regulations came into force in May 2008, the Council has the right to do this without giving any prior warning, even to the landowner. Regardless of the legal niceties, we still consider that such action is extremely discourteous and is likely to cause unnecessary antagonism, which will often be counter-productive.

1.2 If the Council had taken the trouble to inform the Church and ourselves of their intentions, they could have benefitted from our feedback on such issues as legal covenants, site conditions, environmental impact and any future plans for the site that the landowner may have. This need not have caused any delay to the process but it would have been of considerable assistance to the Council to reach the best possible selection of “preferred sites” .

1.3 On the Council’s posted notice, the relocated facilities are described simply as “rugby pitches, club facilities and other sports provision”. The Development Plan documents published on 17th November give a little more information by also referring to “an athletics track”. It was not until visiting the Planning Department that we were able to gain an insight into the full range of facilities that the Rugby Club had in mind, albeit at this stage still described as a “wish-list”. Very few residents have this knowledge and, without it, will have great difficulty in commenting realistically on the merits of the proposal. In their reply dated 4th December 2008 to my concern over this, the Council stated that these details would come later at the Planning Application stage. This is far too late as by then a site will have been allocated and at best, any public comments can only be tinkering at the edges. We know that precise details and layouts must wait until later but, in order to be able to make any sensible comments now, residents need to have a general idea of the kind of facilities involved, likely hours of use, possible noise disturbance, floodlighting, traffic implications and so on. A one-sentence description is just not sufficient.

1.4 All the Council documents refer to the public having a choice between Sites 190 and 193 only. Both the “tick-box flyer” and the Lowestoft Area Response Form (where Note 4 appears to override Note 3) indicate this. It is not clear that the public can in fact comment on any of the five sites proposed by the Rugby Club or, indeed, any other location, providing they give reasons for their choice.

1.5 Although exceeding the statutory minimum, the consultation period of 8 weeks is still considered insufficient. More allowance should have been made for the impact of Christmas and New year holidays and for the fact that this development has not been flagged up previously. It has proved impossible to organise a Public Meeting within the time allotted and this will deprive residents from expressing their views in open debate. The previously arranged GWCP Annual General Meeting is set for 4th March 2009 and it is to be hoped that the Council will take note of this meetings’ conclusions when they evaluate responses to the Public Consultation.

2. Site 190 Land West of Dip Farm (part)

2.1 When the Rugby Club proposed this site, they also included the “meadow” area to the North of Gunton Wood. For reasons of bio-diversity and to maintain wildlife corridors, the Council have deleted this from the proposal. The question therefore arises, “is the Rugby Club still interested in a reduced space which will not be able to accommodate all the facilities that they would like to have?” The Council does not attempt to provide an answer. Instead, their letter of 4th December says in effect, “we will allocate a site and then see what facilities we can fit into it”. This is a very strange way to execute forward planning. A more logical approach would be to determine a “most likely” scenario of what facilities (and therefore space) is needed and then choose a site which can accommodate this, if not initially, then at least with scope to expand in the future.

2.2 In several places, the Council document “Seeking Your Views on the Preferred Sites for Future Development” refers to an athletics track suggesting that this is still an important item on the Council’s agenda. We would agree that there is a real need for such a facility in North Lowestoft, for school as well as for club use. Moreover the 2012 Olympics will stimulate fresh interest in all track and field events and it would be a huge missed opportunity if athletics could not be included simply because of space constraints.

2.3 Attached to this letter is a set of four photographs taken on site recently together with an annotated key which has been superimposed on a “Relocation Feasibility Study” prepared for the Rugby Club earlier this year. The following points are relevant:

(i) The Pit. This is an old clay digging measuring approximately 50 metres in diameter and up to 9 metres in depth. It is estimated that it would require up to 8,000 cubic metres of fill material to level it.

(ii) Surface Water. The areas blocked in red on the drawing indicate the almost permanent presence of surface water during the winter months. This is due to extensive clay deposits, which may well be quite deep, if the depth of the excavated pit is any indication. It is for this reason that the farmer, Michael Edwards, does not attempt to cultivate these areas to avoid getting his machinery bogged down.

(iii) The Ditch. This extends about 70 metres into the field, is always full of water and may be filled by an underground spring.

(iv) The Slope. The diagonal lines show those parts of the field that have a significant slope. It is estimated that the North-West corner is about 9 metres below that of the top plateau

(v) Pipelines. The approximate route of the main sewage foul and return lines and the gas trunk line are indicated. These may or may not be a problem depending on the layout of the facilities.

Summarising, even if large sums of money were to be spent on levelling and drainage improvements it is unlikely that a satisfactory playing surface can be achieved on large parts of this site. If the athletics track is deleted, it would still be almost impossible to squeeze in the number of pitches envisaged in the Rugby Club plans and, because of the closed perimeter, there is no possibility for any future expansion.

2.4 Over the years, our efforts to improve the wildlife habitat conditions in Gunton Wood by planting over 3000 trees and encouraging all forms of ground flora have met general acclaim from Suffolk Wildlife Trust, the Woodland Trust, English Nature and RSPB, culminating in the award of Local Nature Reserve status. Over 50 different species of birds have been observed and we are very protective of our long established resident tawny owls adjacent to the churchyard. Other wildlife resident species include fox, muntjac and a large population of the highly protected great-crested newt. The close proximity of the proposed sports facilities causes us grave concern as we believe that the unavoidable disturbance from crowds, noise, floodlights and traffic is bound to disturb the wildlife balance.

2.5 The Council write-up for Site 190 suggests exploring options for improved public access (and possibly a cycle route?) along the old railway line on the Eastern edge of the site. This location is much favoured by visiting migrants from Northern Europe including the whitethroat, lesser whitethroat, red-backed shrike, wryneck and redstart while many other species may nest there including the yellowhammer and linnnet. Local ornithologists are certain to object strongly to any attempt to disturb this natural habitat.

2.6 Referring to your Sustainability Appraisal for Site 190 we question the positive assessment that you have given to Policy Requirement 16 (to conserve and enhance biodiversity). This Policy has specific objectives such as enhancing LNR's, avoiding disturbance to species and habitats and helping to reverse the national decline in farmland birds. The following points are relevant:

(i) Until recently, the Church Field was managed under the “set aside” scheme and the increase in bird population, including notably, the skylark, was marked. This year part of the field is producing sugar beet, but sizeable areas have been left to wild flowers. It is difficult to see how conversion to grass fields, car parks and buildings can possibly improve biodiversity.

(ii) Even more important is the impact that the development will have on the adjacent land, namely Gunton Wood to the West and the former railway line to the East. In both areas there is a high risk of disturbance to the established patterns of wild life.

We therefore submit that this assessment should be changed from “minor positive” to “major negative”.

2.7 We have problems in imagining how the perimeter fencing of the Church Field would look. If the Hubbards Loke and Gunton Wood edges are to be closed to pedestrians, then a very substantial fence would have to be constructed which would completely spoil the open views towards the coast from the bottom of Gunton Church Lane and from Hubbards Loke.

2.8 We believe it is almost a certainty that a pedestrian access gate or opening would have to be provided in such a fence near the end of Gunton Church Lane. We know that the planned vehicular access is from Leisure Way but we cannot imagine that the public will be content to park there and walk the entire length of the field, up to 500 metres, if their particular sports activity is near Hubbards Loke. Moreover the need for quick access by the emergency services will probably demand another entry point from Gunton Church Lane. Three consequences will arise from this.

(i) Gunton Church Lane will be blocked by parked cars whenever there are rugby matches or practice sessions or athletics meetings. Street parking for church events such as weddings and by visitors to Gunton Wood is already a major problem.

(ii) Any extra traffic at the Gunton Church Lane / A12 junction is a serious matter. This is an accident black-spot.

(iii) The temptation for spectators to use this easy access to Gunton Wood for toilet purposes, rather than walk to the club house, will be too great for some people to resist.

2.9 It should not be assumed that the planned main entry point from Leisure Way will be trouble free. Since this will involve sharing the private access road to Pleasurewood Hills there may be a conflict with Park traffic and it will presumably mean that the meadows on either side will be left permanently open to the public affording easy occupation by Travellers, as did happen last year.

2.10 In the same way that crowds, noise and floodlights will disturb wildlife (refer 2.4 above), the environment for residents living close to the site will also be affected. At present, the Club has senior matches on Saturday afternoons, youth matches on Sunday mornings, evening practice sessions under floodlights on Tuesdays and Thursdays. Athletics meetings would be superimposed on top of this, often under floodlights if a full Level 4 facility is provided (as proposed by the Rugby Club). In addition, it could be expected that the Clubhouse will be granted a drinks licence for social events. In short, if a major sports facility of the size envisaged is located close to existing residential areas there is bound to be a great deal of concern and anger generated. Diminution of property values will be a common cause of complaint against the Council.

2.11 A brief description of a Level 4 Athletics Track is relevant. Measuring about 170 metres long and 90 metres wide it includes 4 or 6 lane sprint tracks, 4 or 6 middle and long distance tracks, jump areas, throwing areas, changing rooms, toilet blocks, storage, floodlighting to 200 – 500 lux for competitions and, probably spectator provision. It would be quite impossible to fit all this onto the Church Field in addition to the number of rugby pitches that are envisaged.

2.12 A special mention should be made about cricket. It is well known that the existing cricket square at Old Lane is too small for the demands made on it during the season, due to an insufficient number of playable strips. Are we going to make the same mistake by simply not having enough space to lay things out properly?

2.13 On a particular case in point, it is quite possible that the noise from Sunday morning matches will interfere with the regular services in St Peters Church.

2.14 It should also be mentioned that football matches on the nearby Dip Farm pitches already cause considerable distress to Hubbards Loke residents, particularly from the frequent use of foul language. Indeed, a few weeks ago the police had to be called to the scene to quell a fracas on the field. Rugby spectators may be somewhat better behaved but shouting is still part and parcel of the experience. If an athletics track is built one could also expect there to be a loudspeaker system to control events.

2.15 In the event that the Council did proceed with the selection of the Church Field as its “preferred site” and the Rugby Club was persuaded to relocate, albeit with a severely restricted range of facilities, one of our major concerns is that, after a while, the Club might wish to expand. They could attempt to do this by repeating their present strategy of selling the Church Field for development and using the proceeds to relocate elsewhere. This fear is widely shared amongst Gunton residents. It is crucially important that no mistakes are made with the present relocation exercise.

3. Alternative Sites

3.1 Of the five sites proposed by the Rugby Club three have been discarded by the Council on the grounds that they (a) are not consistent with the Local Development Framework Core Strategy (b) are located in the open countryside (c) have poor access from residential areas and (d) are not related to existing development. We submit that this is a misapplication of the Core Strategy. If we were trying to find the best location for a play area that was to be used on a frequent basis by the residents of a housing estate, then those factors would indeed be relevant. But an integrated sports facility such as we are considering is a completely different proposition. Consider the following

(i) This is the Lowestoft and Yarmouth Rugby Club. No matter where it is located, only a tiny number of the people using the facility will live within walking distance. The vast majority will travel to the ground from Yarmouth, or greater Lowestoft or the surrounding villages, mainly by car (unfortunately) which is why the Club is proposing parking provision for 200 cars plus coaches for the visiting teams. Easy access from a main road is therefore absolutely crucial.

(ii) It is also very important that the location can be reached easily by bus and by cycle, as this is the best possible way of reducing its “green footprint”.

(iii) There is much emphasis in the Spatial Vision part of the Core Strategy on the “high quality environment where local people, young and old, will want to stay”. We believe that if you locate a concentration of sports facilities with its incumbent collection of crowds, noise, floodlighting and traffic very close to established residential areas you will be working directly against this guiding principle. This drawback applies to both of the “preferred sites” 190 and 193.

3.2 Two of the sites rejected by the Council are Site 194 (between Rackham’s Corner and the new Sewage Plant) and Site 195 (West of A12 surrounding Taylors Farm). Both of these have good access potential, particularly if the Northern Spine Road is built. Both are possibly large enough. Site 195 is believed to be similar to a failed application for a sports facility some years ago, so of the two, Site 194 is preferred.

3.3 However, we would have thought that the best site of all is the land between Sites 193 and 195. This is virtually flat, has very few hedgerow problems with a few isolated standard trees, plenty of space for future expansion, a main vehicular access could easily be constructed from the A12 Rackham’s Corner roundabout via the Sewage plant access road, while cycle access could be arranged from National Cycle Network Route 1 on Corton Long Lane past Weston Barn Farm. It will intrude no further into the countryside than Site 193, which the Council is supporting, while at the same time, it will cause no disturbance to established residential areas. In fact, the Southernmost part of the site is only a very short distance from the Rugby Club’s present location. Moreover, we understand that the site is owned by Suffolk County Council with whom we would expect a cost efficient leasing arrangement could be made that would avoid the expense of compulsory purchase. An imaginatively designed integrated sports facility on this site would present visitors to Lowestoft on the A12 with a very good impression of the town that they were entering.

4. Summary and Conclusion

For your convenience we would like to summarise the key points from the above.

- The present consultation process is flawed in that insufficient information has been provided for a meaningful public response.
- The Council needs to establish the likely range and space requirements of the Club's new facility so that the chosen site will have sufficient room to expand.
- Site 190 (the Church Field) is unsuitable on many grounds for the relocated facilities of the Rugby Club.
- The Council's reasons for discarding some of the other proposed locations are invalid.
- Another site to the East of A12 and to the North of Corton Long Lane is proposed as the best location.

Barry Shimmield
(Original Signed)

Barry Shimmield
Chairman GWCP

Attachments

- (i) Photographs of Site 190 dated 5 December 2008
- (ii) Proposed Site Plan with Annotations dated 11 December 2008

cc Rev John Fairbairn, Rector, Gunton St Peters Church
cc John Bentley, Chairman, Gunton Park Residents Association
cc Councillor Mary Rudd