



Planning Statement

3nr Covered Padel Courts

at

Haverhill Community Sports Association,
The New Croft, Chalkstone Way, Haverhill, Suffolk, CB9 0BW

July 2025

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1.0 Introduction

- 1.1 This statement has been prepared to accompany an application for planning permission for the provision of three covered Padel courts to the New Croft in Chalkstone Way, Haverhill.
- 1.2 The site is an existing sports facility within the administrative area of West Suffolk Council (WSC). The site includes a club house, playing fields, 3G Pitch with a Yoga Studio directly adjacent to the location of the proposed courts. The site is part of Haverhill Community Sports Association.
- 1.3 Subject to planning approval, construction will begin in late 2025/ early 2026.
- 1.4 At the time of writing, there are no padel courts in Haverhill, nor any open planning applications to build any.
- 1.5 There is currently significant unmet demand for padel across Suffolk, South Cambridgeshire and East Essex. This project offers an exciting opportunity to introduce a new, accessible sport for the entire community to enjoy.
- 1.6 The application site is located on the north side of Chalkstone Way. The New Croft is an existing multi-purpose venue which includes community sports facilities, pitches for hire, and a clubhouse with bar, kitchen and hall for hire. The New Croft also provides 'home' facilities for Haverhill Rovers FC and Haverhill Borough FC.
- 1.7 The 3 padel courts will replace a grassed area adjacent to the car park and opposite the clubhouse.
- 1.8 Cycle parking will be available for up to 30 bicycles through 15 tiered racks to encourage cycling.
- 1.9 No changes are proposed to the means of access or the car park, with up to 130 parking opportunities available, in part within a marked parking area and in part with an overflow parking area.
- 1.10 Two accessible parking spaces are located to the front of clubhouse. On major football matchdays the demand for car parking is managed with additional capacity offered by the adjacent school.

2.0 Description of Proposed Development / An Introduction to Padel

- 2.1 The development comprises the construction of three padel tennis courts, each measuring 20m x 10m which are enclosed by metal posts in-filled with clear toughened glazing and metal open mesh panels with the structure extending to 4m high. See photograph below.



- 2.2 Padel tennis is a hybrid racket sport that blends elements of tennis and squash. It's particularly popular in countries like Spain and Sweden and is known for being easy to pick up, even for beginners.
- 2.3 Padel clubs are regularly opening in the UK, Germany, France, the Middle East, Australia, Canada, and the United States.
- 2.4 As with a tennis court the Padel Court is divided by a netting in two halves. It is played with balls and special racquets designed for Padel.
- 2.5 Played mostly as doubles on a smaller, enclosed court, padel emphasizes tactics over physical strength, making it accessible to players of all ages. The game is versatile, offering a challenge to experienced racket players while remaining approachable for newcomers.
- 2.6 Padel is widely renowned as the fastest growing sport in the world and has been touted to become an Olympic sport in 2032. Padel has been growing in popularity at a rapid rate in the UK over the past decade.

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- 2.7 In 2019, the LTA formally adopted padel tennis into its operations. At the time there were 6,000 active padel tennis players in the UK and 125 courts. By 2022, this had increased to an incredible 89,000 players and 250 courts.
- 2.8 As of September 2024, the number reported by the LTA was at 129,000 and up to now there are 489 courts built in the UK (a 43% increase since the LTA adopted governance of the sport).
- 2.9 In the context of the booming popularity, demand continues to outstrip supply of padel courts. In the UK, courts are often located in larger cities where the opportunity is seen to be the greatest and not in smaller conurbations such as Harpenden.
- 2.10 In the LTA's latest padel strategy, released in September 2024, they outlined their goal to grow padel courts from 350 to 1000 by 2026, showing their appetite to build the sport in the UK.
- 2.11 By contrast, as of January 2023, Spain had 15,300 courts and Sweden had 4,200, indicating just how much more there is to come in the UK. PwC in their latest padel global report said that 'the UK is on the brink of significant growth' in padel participation & court capacity.

3.0 Description of Proposed Development

- 3.1 The development comprises the construction of three padel tennis courts, each measuring 20m x 10m which are enclosed by metal posts in-filled with clear toughened glazing and metal open mesh panels with the structure extending to 4m high.
- 3.2 Each court will have a blue or green synthetic turf surface and will be illuminated by integral floodlighting columns within the court frames.
- 3.3 Padel is the fastest growing racket sport in the world. Already very popular in Spain and Latin America, the game is quickly attracting new players around the globe.
- 3.4 Padel clubs are regularly opening in the UK, Germany, France, the Middle East, Australia, Canada, and the United States.
- 3.5 Padel is a mix of tennis and squash and is counted according to the rules of tennis, the walls are involved in the game. The padel is approximately a half of a tennis court and is surrounded on all sides by glass and meshed panels.
- 3.6 As with the tennis court the Padel Court is divided by a netting in two halves. It is played with tennis balls and special racquets designed for Padel.
- 3.7 The playing area of a padel court is 20 x 10 m and with the steel structure is approximately 20.8 x 10.8 m.

4.0 Site and Surroundings

- 4.1 The operational hours of the club are 08:00 to 22:00 hrs every day.
- 4.2 The application site mainly lies within the curtilage of the existing Haverhill Tennis Club close to the centre of the town of Haverhill and the immediate surroundings are of predominantly residential character including a public car park and children's play area.
- 4.3 The site has a very low risk of flooding.
- 4.4 There are some large trees close to the proposed courts, however the development will have no impact on the trees as the proposed concrete footing to the nearest Padel court is over fifteen metres away.
- 4.5 The site has a large car park and the provision of the new courts is unlikely to have an unacceptable impact on the operation and safety of the site's surrounding highway network.
- 4.6 A padel court has glass panel rebound walls and the game involves playing the ball off the rebound walls, resulting in impact noise.
- 4.7 According to the Lawn Tennis Association, Padel courts should not be located within 30m of a residential property.
- 4.8 We estimate that the nearest residential property is over 65m from the proposed location of the Padel courts and the noise generated from the three padel courts will not impact the residential amenity at this location.
- 4.9 A BNG assessment has been undertaken and the reports and calculation have been included with the planning application.
- 4.10 The proposal will create further space for intensive formal outdoor recreation and have the potential to provide social and health benefits to the local residents and users, therefore enhancing the quality of the open space in this regard.
- 4.11 The proposal will improve participation in the use of recreational facilities through the introduction of a development which creates space for a sporting activity.

5.0 Design

Site Layout and Setting

- 5.1 The proposed site has been carefully designed to complement the existing sports zone, utilising unoccupied land adjacent to the car park, while harmonising with the surrounding landscape and maintaining sufficient distance from nearby residential properties.
- 5.2 It is anticipated that this development will have no detrimental impact on the local landscape, as it is situated within an already established sports area.

Considerate Construction Standards

- 5.3 Haverhill Padel Club Limited, in collaboration with The New Croft, proposes to deliver three state-of-the-art, floodlit covered outdoor padel courts.
- 5.4 The padel courts will require a flat smooth surface which is well drained and stable.
- 5.5 The groundworks are anticipated to take six to eight weeks.
- 5.6 The build will be consistent with the standards laid out by the Sports and Play Construction Association (SAPCA). These standards have also been adopted by the LTA in their Padel Guidance Note.
- 5.7 During the build, trucks will need to be on site to deliver both hardcore and tarmac to the courts. The main traffic will be from trucks delivering materials for the build and to remove soil via the existing car park.
- 5.8 The padel courts will include laying a hardcore sub-base along with a layer of porous tarmac, covered with an artificial playing surface.
- 5.9 A concrete ring beam will be laid to support 12mm tempered glass which is located around the corner for the bounce of the ball.

Court Design, Materials and Compliance

- 5.10 The footprint of the padel courts has been kept to a minimum, whilst satisfying the basic requirements of the LTA Padel Guidance Note, SAPCA Codes of Practice and Sports England.
- 5.11 Each court will have a blue synthetic turf surface and will be illuminated by integral floodlighting columns within the court frames.
- 5.12 The size of each padel court is 20m long and 10m wide.
- 5.13 The site will offer three courts side by side.

- 5.14 The proposed padel courts will be outdoor courts with the entire space internally enclosed by a security fence.

Floodlighting Design and Impact

- 5.15 Floodlighting is required to enable evening use during darkness, and winter months, thereby maximising community access to the courts.
- 5.16 A Low Impact Lighting Strategy has also been prepared to assess and mitigate potential light spill beyond the site boundary.
- 5.17 The selected floodlights and luminaires have been specified to be visually discreet, with a dark powder-coated finish to minimise visual impact.
- 5.18 Each court will feature 8 downward-facing LED floodlights (16 total), integrated directly into the court structure.
- 5.19 The floodlighting system is fully integrated with the digital booking platform, meaning the floodlights will only turn on during active bookings and automatically switch off when courts are not in use.
- 5.20 This ensures the artificial light levels are kept to an absolute minimum outside of active playing hours.

Security and Maintenance

- 5.21 The proposed padel courts will be enclosed by a 3m high gated fence. Site safety and security will be maintained by Haverhill Padel Club, with the following provisions highlighted:

Installing a gated security fence.

Entry to the courts will be via a gate.

Pre-existing CCTV.

- 5.22 The courts will be inspected and brushed each week and sand replenishment will occur as required.

6.0 Accessibility

- 6.1 The facility will be fully accessible, featuring appropriate access paths, level surfacing, and wheelchair-friendly court access. The design is fully compliant with the Disability Discrimination Act (DDA).
- 6.2 The introduction of padel facilities aims to offer access to a new and rapidly growing sport, utilising currently unoccupied land adjacent to the existing sports area.
- 6.3 The project is designed to encourage both new and existing users of The New Croft and Haverhill to engage in padel, while adding value to the sports zone.

7.0 Car Parking and Vehicle Access

- 7.1 Active travel will be encouraged amongst all users and visitors.
- 7.2 The park is easily accessed via pedestrian and cycling routes, with bike parking adjacent to the club house.
- 7.3 The proposed facility is also within a 10-minute walk of the town centre, with regular bus services nearby.
- 7.4 Given that each court accommodates four players, we estimate footfall to be in the region of 20-30 people at peak times including those waiting to play and a small number of spectators.
- 7.5 This can comfortably be accommodated by the existing car parks.
- 7.6 The accessibility of the development by active travel, proximity to public transport, and local parking standards have been fully considered in the preparation of this proposal.

8.0 Social Impact and Community Benefit

- 8.1 Sport England in their 'Towards an Active Nation Strategy' actively encouraged the creation of outdoor spaces to get people outdoors and in a real-life activity as opposed to being indoors in a 'virtual' setting.
- 8.2 This padel facility promotes positive social interactions by being aimed at all ages, genders, abilities and is designed to be fully inclusive.

Summary of Local Benefits

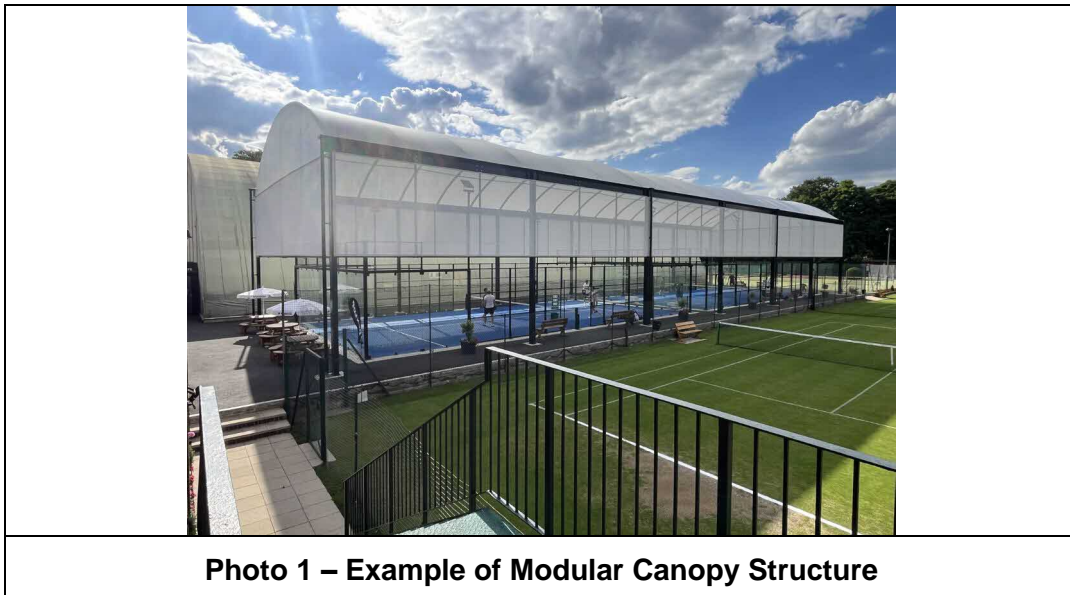
- 8.3 Beyond policy compliance, this proposal offers a range of benefits for Haverhill and the wider west Suffolk and South Cambridgeshire community, including:
- a. **Grow participation in sport in Haverhill:** Introduce an undersupplied, inclusive and highly desirable sport with both paid and free access opportunities.
 - b. **Improve local sports facilities:** Add to the New Croft's existing sporting facilities to expand the recreational opportunities for Haverhill residents.
 - c. **Support Community Wellbeing:** Promote social and health initiatives, particularly for young people.

9.0 Support from Local Residents

- 9.1 A community consultation meeting was held at the New Croft on the Tuesday 1st April which was well attended by local councillors, several local residents and users of the New Croft sports facilities.
- 9.2 A comments sheet was provided at the meeting and this is included in Appendix A.

10.0 Canopies

- 10.1 There are two main types of structure used to cover padel courts, modular and clear span structures. Both types of structures come in a range of closed-sided or open-sided structures and can be used to cover padel courts at a more economical cost than a traditional building or an air inflated structure.
- 10.2 The modular type of structure shown in the photograph below is designed to cover padel courts individually; where more than one court is being covered, columns sit between courts, creating a singular larger structure.
- 10.3 The main advantage of this type of structure is that due to the relatively short span for the roof, the costs can often be kept lower and also the modular nature covering single court spans, allows the structure to be fitted into the tight confines of existing facilities.



- 10.4 To enable lob shots to be played, these modular structures are designed with a 6.0m eaves height, across a span of 11.0m, ensuring a minimum roof height along the centre line down the length of the court of nominally 8.0m, with the roof height falling to just over 6.0m along the perimeter of the padel enclosure.
- 10.5 The canopies will be installed by Fordingbridge PLC who are based in Arundel in West Sussex.
- 10.6 The sales director at Fordingbridge is Adam Collier, who wrote the Sports and Play Construction Association (SAPCA) Code of Practice for the Construction of Padel Courts.
- 10.7 A white fabric canopy roof is essential and for the New Croft site the side cladding will be green rather than white as shown in the photograph below.

- 10.8 The green mesh to the sides of the canopies will match the trees behind the courts on Chalkstone Way and the white roof will match the sky.



- 10.9 The white fire-retardant Opal 60 fabric that Fordingbridge will supply is a sustainable solution, ensuring no floodlights will be required during daylight hours.
- 10.10 Due to the way the membrane is woven, it ensures that sufficient natural daylight can pass through but not spill out of the structure.
- 10.11 The image below of the canopies at West Worthing Club shows no light spill into the night sky.



Photo 3 – Example of Green side panels and white membrane roofs showing no light spill above

- 10.12 The photograph above also shows the impact on the light spill by not having the side panels on one side. The canopies to be constructed in Haverhill will have side panels on all sides and the light spill will be contained and there will be no light spill into the night sky.
- 10.13 Please note that the padel court lights are downward facing lights and this type of structure has obtained planning permission in over fifty locations throughout the UK for padel related projects.
- 10.14 In addition to over one thousand other canopy structure across the UK using the Opal 60 membrane.
- 10.15 If a thicker membrane or solid panel is used then the light translucency significantly reduces and the courts will have to be illuminated using the floodlights much more often and during daylight hours on cloudy days.

10.16 The Opal 60 membrane has been used on the canopies at Holt Garden Centre as shown in the photographs below.



Photo 5 - White membrane roofs to Holt Garden Centre

10.17 The canopies shown above are located in an AONB in the countryside.

10.18 At the garden centre the canopy contains the light but during daytime lets the light in which means much less artificial lighting is required during the day.

10.19 The canopies will be nine metres high to enable lob shots to be played, and will allow professional competitive play at a high level to be played on the courts and as recommended by the Lawn Tennis Association.

11.0 Site and Surroundings

- 11.1 The courts will be available for use between 07:00 to 22:00 hrs every day and the floodlights will be controlled by passive infra red sensors that will switch off the lights as soon as the players leave the court. The lights will not be left on after 10pm in the evening.
- 11.2 The courts will not be available to book after 9pm.
- 11.3 The New Croft, which is opposite the proposed location, have sports facilities with floodlights that are permanently on until 10pm most evenings of the week. The town is also lit at night by car headlights, street lights etc.
- 11.4 The applicant believes that it is essential to offer the public sports facilities that they can use before and after work and recreation grounds / sports facilities and lighting for winter use go hand in hand.
- 11.5 The existing football club have floodlights which can be in use until 10pm every evening.
- 11.6 The padel courts will have specific downward facing lighting and as mentioned above the canopy will limit the glare.

12.0 Lighting Impact

- 12.1 We have commissioned a Lighting Impact Assessment and this is summarised as follows:-
- 12.2 The site is considered to reside in Environmental Zone E3 'medium district brightness, urban'.
- 12.3 The courts will be used during the evening, and all lighting will be switched off from 22:00.
- 12.4 A canopy will be provided over the padel courts, reducing outward light spill and resolving glare issues from external viewpoints.
- 12.5 The lighting design has been prepared to demonstrate that the development meets the lighting requirements set by the Lawn Tennis Association for a recreational use padel court.
- 12.6 Various best practices and embedded design mitigation measures have been included during the design process to control light and reduce levels of light spill.
- 12.7 Illuminance light spill contour plots and an impact assessment to consider horizontal and vertical lux levels at surrounding human sensitive receptors have been completed.
- 12.8 The impact assessment indicates there will be no adverse effects on surrounding sensitive receptors and the overall effect of lighting can be concluded as not significant.
- 12.9 Best practice design and mitigation have been incorporated into the exterior lighting design. This includes the selection of appropriate luminaires and optics, heights and placement positions. Measures to reduce obtrusive light and pollution are inherent to the design, meeting the requirements of the Institution of Lighting Professionals (ILP) GN1 and the Lawn Tennis Association's (LTA) best practice guide.
- 12.10 The lighting design has been modelled using the industry-adopted and widely used 2D lighting software Lighting Reality.
- 12.11 The site lies within the footprint of the sports complex, therefore, there are no sensitive receptors in close proximity to the development. The closest dwellings are located on the south side of Chalkstone Way, approximately 60 m to the south of the site.
- 12.12 There are no ecological sensitive receptors identified that require further assessment.
- 12.13 The structure will be fitted with a semi-translucent canopy, which covers the roof and extends partly down the sides of the structure which will act as an effective

blockage to light spill. The material obscures the luminaire, effectively eliminating the viewing angle that would cause glare issues to external receptors.

- 12.14 The site is surrounded by an extensively lit sports complex, comprising fully lit sports pitches that far exceed the size of the padel courts footprint and column heights. The site will sit within the context of the sports complex and also operate within the same operating hours.
- 12.15 Several sports pitches in the sports complex are lit, as well as ancillary uses, such as the welcome centre and parking areas. Outside of the viewpoint lies several other lit pitches to the north. Consequently, the baseline environment in the immediate area around the site includes extensive lighting.
- 12.16 The sports complex includes floodlighting and sports requirement lighting provisions. These include floodlights installed on masts around 15 m high. These are positioned around the perimeter of all lit pitches.
- 12.17 Street lighting is present along Chalkstone Way and on the residential side street branching off Chalkstone Way. The wider urban area of Haverhill borders the sports complex to the east, south and west. The local area within 500 m of the site is mostly residential use.
- 12.18 There are four 6 m columns positioned around each padel court, with each column holding two floodlights. Therefore, there are eight floodlights per court, with 24 floodlights total at the three courts. This setup meets LTA best practice². Each column is 4 m inward from the edge.
- 12.19 Each court is lit to the required lighting standard. This allows individual courts to be switched on or off, corresponding to customer usage levels.
- 12.20 The three courts are positioned side-by-side, therefore, the centre courts will receive light spill from the adjacent courts and may appear to be overlit. However, it is necessary to ensure each court can meet the required lighting standard in isolation if other courts are switched off.
- 12.21 The layout includes benches along the east side of the courts at the edge of the structure. Light spill from the padel courts will provide more than sufficient lighting for this purpose. Isolated lighting in the bench area is not deemed to be required.
- 12.22 The assessment has predicted vertical lux at one existing sensitive receptor. There is no operational lighting during the post-curfew hours.
- 12.23 The potential lux impact is negligible and not significant.
- 12.24 The effects of skyglow are concluded to be not significant.
- 12.25 The semi-translucent canopy will act as a diffuser regarding viewpoints towards the LED plate of the luminaire.

- 12.26 The Yoga Hive building and trees also obstruct views from the south towards the developments.
- 12.27 Miller Goodall Ltd has suggested a 4000 Kelvin colour temperature is installed, as this temperature contains less blue wave length content.
- 12.28 The assessment concludes that the potential illuminance vertical intrusion impact on surrounding human sensitive receptors is not significant and meets the requirements of the Institution of Lighting Professionals guidance.
- 12.29 The assessment demonstrates an appropriate lighting design for the intended use. It indicates that there will be no impact on surrounding sensitive receptors and that the adverse effects to the surrounding environment are limited due to the inclusion of embedded mitigation and operational controls.
- 12.30 There is no reason for the application to be refused on the grounds of lighting.

13.0 Noise Impact

13.1 The National Planning Policy Framework (NPPF), December 2024, sets out the Government's planning policies for England and "these policies articulate the Government's vision of sustainable development." In respect of noise, Paragraph 198 of the NPPF states the following:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) *mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
- b) *identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- c) *limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."*

13.2 With regard to the local policy, regard is had to the West Suffolk, Forest Heath and St Edmundsbury Local Plan Joint Management Policies Document (February 2015). In terms of noise Policy DM 2 'Creating Places' states the following:

"Proposals for all development should, as appropriate:

- g. taking mitigation measures into account, not affect adversely:*
- v. the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated;"*

13.3 We estimate that the nearest residential property is over 64m from the proposed location of the Padel courts and don't believe that the noise or light generated from the three padel courts would negatively impact the residential amenity at this location.

13.4 The nearest property also faces the end of the court that has a 4m high glass screen which will cause the noise of the ball being hit to bounce back into the court and the canopies and mesh sides will also dissipate and reduce the noise transfer.

13.5 The canopy will also assist with containing any noise as will the new bank and hedging.

13.6 Between the site and the residential properties there is a car park, a high hedge, further planting and a road.

- 13.7 We have commissioned a Noise Impact Assessment from Sharps Redmore to consider the impact of noise from the padel tennis courts on the existing noise sensitive properties in the vicinity of the site including the residential properties directly opposite the site. This is summarised as follows:-
- 13.8 The nearest noise sensitive properties to the proposed courts are the residential properties to the south of the site on the opposite side of Chalkstone Way.
- 13.9 A survey of existing noise levels was carried out between the 14th and 15th May 2025.
- 13.10 Noise levels at both locations were dominated by road traffic and existing site activity.
- 13.11 To determine measurements from padel tennis SR carried out a series of measurements on 5 March 2025 from an existing padel tennis court at Sutton Coldfield Tennis Centre.
- 13.12 Measurements of a club match (males' double game) were carried out at locations around the court. It was arranged that no other matches were taking place at the same time to reduce the influence of other noise sources. Continuous measurements were taken over a 15- minute period.
- 13.13 Unlike standard tennis courts, padel courts have a screen around the rear and part of the sides of the court. The higher noise levels measured at the side of the court was due to this being the 'open' part of the court.
- 13.14 To determine noise from the proposed padel tennis court, SR used SoundPLAN computer modelling software to predict noise levels at the nearest noise sensitive properties.
- 13.15 SoundPLAN predicts the noise levels, LAeqT and LAfmax in accordance with relevant standards based on a number of input parameters, including noise source data, topography, barriers and intervening ground conditions.
- 13.16 Predicted noise levels from padel tennis at the nearest residential properties will be no greater than 41 dB LAeq1hr and 49 dB LAfmax.
- 13.17 Predicted noise levels (LAeq1hr) will be significantly (9 dB) below the WHO Guidelines Values and also below the guidance suggested in the Sport England Guide of 50 dB LAeq1hr.
- 13.18 Predicted noise levels will also be well below the existing ambient noise levels and the change in noise level will be negligible.
- 13.19 With regard to maximum, LAfmax levels of the ball hitting the court, there are no standards which considers the impact of maximum levels during daytime hours.

- 13.20 However, predicted levels are significantly below the recommended WHO levels for onset of sleep disturbance (60 dB) and therefore can be considered that impact will be negligible.
- 13.21 Considering the above and existing use of the site it is concluded that noise from the proposed Padel Tennis courts will be below the lowest observed adverse effect level (LOAEL) and as results the use of the courts is in accordance with national and local policy aims.

14.0 Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) Assessment

- 14.1 The National Planning Policy Framework (NPPF) December 2024 places responsibility on Local Planning Authorities (LPAs) to aim to conserve and enhance biodiversity in and around developments.
- 14.2 Section 40 of the NERC Act requires every public body to “have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.
- 14.3 Biodiversity, as covered by the Section 40 duty, is not confined to habitats and species of principal importance but refers to all species and habitats. However, the expectation is that public bodies would refer to the Section 41 list (of species and habitats) through compliance with the Section 40 duty.
- 14.4 We have commissioned DCS Ecology Ltd to carry out and this is summarised as follows:-
- 14.5 The site falls within West Suffolk Council Local Planning Authority (LPA) and will require a BNG assessment to replace biodiversity units lost to the proposal by a minimum of 110% (original value).
- 14.6 The area is currently being used as a sports field, it is entirely short-mown modified grassland.
- 14.7 To the north-west is further modified grassland, to the north-east a fenced sports court on artificial ground, to the south-east a hardstanding footpath, car park and buildings, and to the south-west a yoga building, and modified grass, beyond which is a mixed native species hedgerow (predominantly field maple and hawthorn) and road (Chalkstone Way)
- 14.8 Data obtained from the Suffolk Biodiversity Information Services (SBIS) was used to conduct a cross-county standard data search. The data was received on 28th May 2025.
- 14.9 A 10km radius search for European Designated Sites, including Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar’s was also undertaken using MAGIC.
- 14.10 A 2km radius search for designated sites on a local/national level included Local Nature Reserves (LNRs), National Nature Reserves (NNRs), Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI), and biosphere reserves which were also searched for using MAGIC.
- 14.11 As well as past and current EPS licences and GCN pond survey results within a 7km radius. All MAGIC searches were conducted on 30th May 2025.

- 14.12 A Preliminary Ecological Appraisal was carried out by DCS Ecology Ltd on 3rd June 2025.
- 14.13 There were no structures or mature trees within the site boundaries of site that create potential roosting locations for bat species, as the site consisted of only modified grassland (g4).
- 14.14 The nearest trees, 20m south-west within the hedgerow adjacent to Chalkstone Way, were small (DBH less than 30cm).
- 14.15 Several medium sized birch trees 25m south (behind the yoga building) had no noted potential roost features.
- 14.16 No trees are present on or within 15m of site.
- 14.17 This site is likely to have no value for roosting bat species.
- 14.18 The majority of habitat onsite was considered sub-optimal for foraging bat species, as the modified grassland present onsite created few foraging opportunities for bats to utilise.
- 14.19 The site is considered to have negligible importance as foraging and commuting habitat for bat species.
- 14.20 No signs of badgers, such as latrines, snuffle holes, fur, setts, or scratch marks were found during the survey.
- 14.21 The site was considered to have 'Site' importance for badger foraging.
- 14.22 No active or disused bird nests and breeding behaviour was noted whilst onsite.
- 14.23 This site is likely to be of 'Site' value for a range of foraging bird species, but 'Negligible' value for nesting bird species.
- 14.24 No evidence of Great Crested Newts (GCN) were found during the site visit.
- 14.25 Habitats onsite were considered largely unsuitable for GCN in their terrestrial phases, due to the lack of dense vegetation cover across the site that would normally provide foraging and sheltering opportunities.
- 14.26 No habitats onsite were considered suitable for GCN, and GCN are unlikely to traverse through site (which may be impacted by works). Therefore, it is highly unlikely that works will cause an offence to GCN.
- 14.27 The site was considered to have 'Site' value for priority species including hedgehogs and brown hares.
- 14.28 No evidence of reptiles was identified during the survey.

- 14.29 Habitat onsite was considered largely unsuitable for common reptile species including common lizard (*Zootoca vivipara*), slow worm (*Anguis fragilis*), and grass snake (*Natrix helvetica*).
- 14.30 This site is considered to have 'Negligible' value for common and widespread reptile species including slow worm, common lizard, and grass snake.
- 14.31 The lack of any significant water bodies nearby, make it largely unlikely that riparian mammal species including water vole and otter will be using the site. This lack of water bodies also results in white-claw crayfish being scoped out.
- 14.32 Hazel dormouse was scoped out of this report due to the lack of dense vegetation onsite. The site is also isolated from any suitable habitat, and so, it was considered highly unlikely that hazel dormouse would be present onsite.
- 14.33 The risk of impact to SSSI designated sites is negligible and pre- development consultation with Natural England is not considered necessary.
- 14.34 The risk of impact to internationally designated sites is negligible and a habitat regulation assessment (HRA) or other pre-development consultation with Natural England is not considered necessary.
- 14.35 No notable flora species were identified onsite and no habitats other than short-mown modified grassland were recorded.
- 14.36 The footprint of the padel courts will result in the permanent loss of modified grassland (g4). This equates to a total loss of 0.21 BU, this will be offset by the planting of trees and enhancement of modified grassland to the northern end of the field, which will result in the creation of 0.27 BU, a 23.33% net increase in biodiversity value.
- 14.37 Modified grassland onsite is to be removed and replaced with a padel court. Exact materials are unknown, but the company to undertake construction, Padel Creations, typically use a concrete or asphalt foundation overlaid with artificial grass, and bordered by metallic fencing.
- 14.38 To meet the minimum 10% BNG onsite and comply with trading standards, a post-development figure of 0.231 BY (0.21+0.021) BU is required.
- 14.39 Suggestions include the enhancement of 300m² (0.03ha) strip of modified grassland with the sowing of a diverse seed mix with a variety of wildflowers and grasses.
- 14.40 Suggestions also include the planting of at least twelve small or three medium sized native trees.
- 14.41 Four small trees are generally equal to the size and biodiversity value of one medium sized tree, and so mixtures of both small and medium trees can also be created.

- 14.42 For small native trees, these should be species such as wild cherry (*Prunus avium*), rowan (*Sorbus aucuparia*) and elder (*Sambucus nigra*).
- 14.43 For medium sized native trees, these should include species such as English elm (*Ulmus procera*), ash (*Fraxinus excelsior*), common beech (*Fagus sylvatica*) and silver birch (*Betula pendula*).
- 14.44 These trees should be watered regularly during the weeks after planting while trees take root, and should be suitably protected from grazing animals if under 1m in height, such as with a tree guard. It is expected to take 27 years for these trees to reach the target condition of 'Moderate'.
- 14.45 The risk of disturbance to foraging and commuting bats due to potential installed padel court lighting was considered. However, (1) floodlights already exist in adjacent sport courts (2) There are street lights along both sides of Chalkstone Way every 30-40m along both sides of boundary road and (3) metre-high light bollards were present along pavements to the south-east and north-east of site.
- 14.46 Therefore surrounding external lighting will illuminate site regardless, and there is predicted to be little to no increased risk of disturbance to bats via increased lighting post works.
- 14.47 No further bat surveys will be required, as current proposals do not include the demolition of any structures or felling of any mature trees.
- 14.48 No further surveys are considered necessary. However precautionary measures should be followed to ensure badgers foraging on or adjacent to site are not negatively impacted.
- 14.49 No further bird surveys are considered necessary; however, if dense vegetation develops onsite between the date the survey was undertaken and the start of works, any dense vegetation clearance should be carried out outside the breeding bird season.
- 14.50 No further GCN surveys are considered necessary. Precautionary measures should be followed to reduce the risk of injuring GCN or reptiles in the unlikely event that individuals traverse onto the site.
- 14.51 The Preliminary Ecological Appraisal and BNG Assessment found the Site to contain habitats suitable for supporting protected and priority species – namely birds, badgers, and priority species including hedgehogs and brown hares.
- 14.52 The habitats recorded onsite and within the area of works short mown modified grassland . These habitats and features provide habitat for foraging birds, hedgehogs, brown hares, and badgers.
- 14.53 A BNG assessment calculated the site to have a baseline of **0.21BU habitat area**.

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- 14.54 Development proposals will result in the permanent loss all 0.21 **BU** of **modified grassland (0.107ha)**.
- 14.55 Existing proposals involve the development of a series of padel courts, which consitiutes as 'sealed surface'.
- 14.56 Recommended habitat creation and enhancement offsite is calculated to achieve 0.27 BU (a 23.33% increase), which meets the requirement for 10% Biodiversity Net Gain and Suffolk Wildlife Trust's recommendation to meet 20% where possible.
- 14.57 It is unlikely that the proposed development would cause a significant long or short-term impact to the conservation status of protected species in the area or to the conservation sites in the surrounding area if these measures are followed, but sensitive planning may increase species abundance and diversity due to the habitat enhancements.
- 14.58 Any short-term impacts to species populations or individuals would have been minimised through the incorporation of the above recommendation prior to, and during works.

15.0 Travel

- 15.1 The National Planning Policy Framework (NPPF) December 2024 places responsibility on Local Planning Authorities (LPAs) to aim to conserve and enhance biodiversity in and around developments.
- 15.2 The revised National Planning Policy Framework (NPPF) states that a key tool to facilitate the use of sustainable transport modes is a Travel Plan and at paragraph 118 states: *“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”*
- 15.3 A Travel Plan is later defined as:
- “A long-term management strategy for an organisation or site that details how agreed sustainable transport objectives are to be delivered, and which is monitored and regularly reviewed.”*
- 15.4 The Joint Development Management Policies Document published in February 2015 is brought forward by Forest Heath District Council and St Edmundsbury Borough Council in the context of other policy input. Within the document, Travel Plans are described as the cornerstone of Transport Assessment, identifying opportunities and setting targets for minimising car use.
- 15.5 The Travel Plan should include both the physical and management measures necessary to address the transport impacts arising from the new development, as it will become a key management tool integrating all the different elements.
- 15.6 Policy DM45: Transport Assessments and Travel Plans describes that:
- “A Travel Plan that identifies the physical and management measures necessary to address the transport implications arising from development.”*
- 15.7 In the context of both the national and emerging local policies the proposed introduction of three padel courts at an established community sports facility is not a major proposal representing a significant generator of travel demand.
- 15.8 However, we have commissioned a Travel Plan by TTP Consulting Limited and this is summarised as follows:-
- 15.9 The aim of the Travel Plan is to put in place the management tools that are necessary to enable the Padel court users and staff to make informed decisions about their travel to the site.
- 15.10 This will in effect minimise the adverse impacts of their travel to / from the site on the environment.

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- 15.11 This aim is achieved by setting out a strategy for eliminating barriers which keep the padel court users and staff from making use of sustainable modes including car share and active travel.
- 15.12 On average, the padel courts are expected to attract 72 per day, with weekends typically busier than weekdays and weekday evenings typically busier than daytime, subject also to seasonal variation.
- 15.13 If all three courts are in use for doubles, then there would be 24 visitors arriving and departing each hour.
- 15.14 Whilst it is possible, it is considered unlikely that all three courts would be fully booked for doubles across a whole day and that the potential 12 visitors per hour would all drive as single-occupants of the vehicle. In practice there will be some reliance on other modes of travel as well as some driver plus passenger/s activity.
- 15.15 In terms of travel options, staff and visitors will be able to walk, cycle or travel by bus or car. The travel demands of the three proposed padel courts will not be significant and is likely to be imperceptible to other road users.
- 15.16 Cycle parking is provided for 30 bicycles through 15 tiered racks to encourage cycling. There is a car park in front of the clubhouse which has 25 spaces including 2 accessible bays.
- 15.17 There is an additional area of parking offering the opportunity for up to 105 vehicles.
- 15.18 The existing car park provides enough capacity to meet the needs of the padel courts, noting that on football match days The New Croft manages its car parking with the use of additional overflow parking located at the adjacent Westfield Primary School.
- 15.19 There are bus stops on Chalkstone Way within walking distance of the site. The closest bus stop offering access to southbound services is located 50m (less than 1 minute's walk) to the south, and the closest bus stop for northbound is located 80m to the north, approximately 1 minute's walk.
- 15.20 To the north and south there are zebra crossings on Chalkstone Way.
- 15.21 The walking environment in the vicinity of the site is well established (given the proximity of local schools), with footways to both sides of Chalkstone Road and a good choice of crossing locations.
- 15.22 There is a good network of footpaths and traffic-free routes in the area.
- 15.23 It is generally accepted that cycling is a sustainable mode of travel for journeys up to 8km in length. Haverhill, Kedington, Sturmer, Withersfield and Great Wrattling are within cycling distance.

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- 15.24 The closest bus stops on Chalkstone Way are located 50 – 80m from the site which is up to a one minute walk. Northbound services are available on routes 13 and 13A to Cambridge. Southbound services are available on routes 18 and 25 to Clare.
- 15.25 The Travel Plan Co-ordinator will implement and administer the Travel Plan. The Travel Plan Co-ordinator will have access to the appropriate technology to communicate effectively with staff, visitors and stakeholders using a variety of mediums.
- 15.26 The Travel Plan Co-ordinator will seek to reduce single occupancy car use, whilst promoting car sharing, walking, cycling and public transport. Information including maps and timetables will be promoted at the site to advise on the benefits of alternative modes of travel.
- 15.27 Measures will concentrate on encouraging staff and players by informing them of the benefits of travelling by alternative modes.
- 15.28 The Travel Plan Co-ordinator will ensure staff are aware of cycling initiatives set up by the Local Council and non-profit organisations,
- 15.29 The provision of cycle parking will encourage staff to cycle and helps promote the aims of the Travel Plan.
- 15.30 The Travel Plan Co-ordinator will promote sustainable travel for general travel as part of a healthier way of life not only for travel to and from the site.
- 15.31 The Travel Plan Co-ordinator will monitor:
- The use of the car park;
 - The demand for the electric vehicle charging spaces;
 - The number of people partaking in car share; and
 - The use and condition of the cycle parking.
- 15.32 It is demonstrated that the location is accessible by a choice of transport modes, with a residential catchment within acceptable distances for both walking and cycling trips.
- 15.33 In the context of national and regional policy the introduction of three padel courts is not a significant generator of travel demand and as such does not require a detailed assessment of transport impact, nor does it require a full Travel Plan.
- 15.34 No changes are proposed or considered necessary in terms of vehicle access or the provision of car parking and the overall effect of the proposal in transport terms is considered to be negligible.

Appendix A

Messages of Support from Local Residents

PADEL COURT

CONSULTATION EVENT

We've teamed up with local business owner, Callum Slater to help bring the world's fastest-growing sport to Haverhill.

Want to learn more? Join us any time between 5-7pm

1ST APRIL

📍 The New Croft, Bar Area



COMMENTS PLEASE!

Please add your comments, positive or negative below.

| NAME | COMMENT |
|------------------------|--|
| Dun Muir | A great social sport that will help build a new community in the area. |
| Sosh Smith | closer so can play and enjoy it more often |
| Albie Tommaso | A great way of social interacting with other people in the local community and a great use of the spare space around the new club. |
| Ryan Churcher | This would be a great addition to the town + facility. |
| Ainsley Culbert | Padel is a great social sport and also good for families to play together so these plans are a great idea |
| Stuart Cowe | A GREAT IDEA |
| Carly Loveday | This would be a very welcome addition to the town. |
| Jacqui + Steve Saville | A great addition to Hawes Hill, look forward to it! |
| Leroy Wilson | Great way to keep fit |
| Lucy Goddard | A must have !! |

COMMENTS PLEASE!

Please add your comments, positive or negative below.

| NAME | COMMENT |
|------------------------------|--|
| JULIA TOSH | WOULD DEFINITELY BE A POSITIVE MOVE. ANOTHER NEEDED ACTIVITY FOR ALL AGES. |
| Jacob Evans | Brilliant idea and location. |
| Amada Smith | Great idea, would definitely join any club of both as private. |
| Simon Iron | Been waiting for a while |
| Abi Cartwright-Thomas | A great new facility for Nowerhill and widening the sports offer |
| Jamie Broughton | In my experience, people who have tried padel grow to love it and so it can become very popular in a town. |
| ALASTAIR COCKS [REDACTED] | GREAT IDEA. COVERED - ESSENTIAL. JOIN ME UP. |
| CHRIS LOVEDAY | BRILLIANT CONCEPT AND A MUCH NEEDED FACILITY FOR THE TOWN AND AREA! |
| Joanne Coote | Great addition to the town. Can't wait |
| Stephanie Fitzpatrick | a great idea. |

COMMENTS PLEASE!

Please add your comments, positive or negative below.

| NAME | COMMENT |
|--------------|--|
| Niall Bergin | Looking forward to the song to know him. |
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