

## Report of the Head of Planning & Enforcement Services

**Address** EASTCOTE HOCKEY CLUB KINGS COLLEGE ROAD RUISLIP

**Development:** Construction of an all-weather, sand dressed multi-purpose sports playing pitch, with associated floodlighting, fencing and car parking.

**LBH Ref Nos:** 2414/APP/2012/2812

**Drawing Nos:** EHC-ESP-02 Existing Site Plan  
EHC-ESP-01 Existing Site Plan  
EHC-PSP-01 Proposed Site Plan  
EHC-PSP-02 Proposed Site Plan  
EHC/1 Proposed Flood Lighting Spillage Lighting Assessment  
Noise Impact Assessment  
Planning, Design and Access Statement  
Transport Assessment  
Travel Plan  
DS12041201.02 Tree Constraints Plan  
DS12041201.01 Tree Survey Plan  
Tree Survey Report  
EH/2 Proposed Floodlighting Spillage T base FoldScan Column - 15M  
EH/3 Proposed Floodlighting Spillage  
EH/4 Proposed Flood Lighting Spillage Location Plan  
Arboricultural Impact Assessment  
DS12041201.03 Arboricultural Impact Plan  
0112-SK-03-A Car Park Swept Path  
130201 Geometric Parking Review  
Eastcote Hockey Club Responses  
Flood Risk Assessment response  
Arboricultural Response  
Addendum to Planning, Design and Access Statement  
EHC/4 Rev 3 Eastcote Hockey Lighting Calculations  
Eastcote Hockey Club - 350 Lux Floodlighting  
Ecological Appraisal February 2013  
X-210387B/TB/EGS/March 2013 Rev E Flood Risk Assessment  
X210387-04 Rev P3 Fencing Diagram

<b>Date Plans Received:</b>	13/11/2012	<b>Date(s) of Amendment(s):</b>	20/12/2012
<b>Date Application Valid:</b>	13/12/2012		21/12/2012
			06/02/2013
			13/11/2012
			15/02/2013
			11/03/2013
			14/12/2012

### 1. SUMMARY

Planning permission is sought for the construction of an additional all-weather multi purpose sports pitch with associated floodlighting and fencing, together with additional car parking at the Kings College Playing Fields, on an area currently partly being used as

football playing pitches.

781 local residents/ amenity groups have been consulted. To date, 462 individual responses and a petition bearing 5,200 signatures have been received, objecting to the planning application as originally submitted. A further 30 letters of objection were received in response to reconsultation following the submission of amended plans and documentation.

Objections have also been received from various local amenity groups. The principle areas of concern relate to the loss of public access to the playing fields, impact on residential amenity arising from noise and floodlighting, impact on local ecology, flooding, disruption to the public right of way and highway considerations.

In addition 107 letters of support have been received to the public consultation, together with 2 petitions bearing 534 signatures (online petition) and the other bearing 65 in support of the application. This petition notes that the second pitch will allow the club to play all its home games at the club and carry out all their youth coaching and matches to cope with the ever-increasing number of youngsters who want to join in. Approval of the 2nd pitch would enable the club to make those facilities available to the community, whilst Ruislip Rangers will continue to use the grass pitches for junior football and the running track will be upgraded and maintained.

7 letters commenting on the application were also received.

Two similar applications (but without a car park) were withdrawn before determination by the applicants on 22/2/2011 and 30/1/12 respectively, when it was clear that these applications were to be recommended for refusal. The current application has been submitted in an attempt to overcome previous concerns.

Subject to mitigation, it is considered that development would not adversely affect the amenities of nearby residential properties from the activity generated by the floodlit pitch, in terms of noise or light spill from the proposed floodlights. No objections are raised to the principle of the use of the site as an outdoor sports facility. However, the proposal raises a number of concerns. The proposal would introduce hard surfaced areas, fencing, floodlighting and car parking and remove distinctive landscaping features that would result in a built-up appearance on the site, which is designated as Green Chain land. The proposal would affect the fundamental open character of the area and it is not considered in this instance that the adverse impact on the open space has been outweighed by the benefits associated with the new recreational facilities.

Although the adjacent Public Right of Way will remain physically uninterrupted by the development, it is considered important that the attractiveness of the Celandine Route is maintained, and the proposal would have a detrimental effect on the visual amenity of the public footpath and would fail to enhance the local character, visual amenity, ecology and sustainable access to the river walk.

In addition, the application has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area, including the adjacent River Pinn corridor. The application also fails to adequately assess the implications of the proposal on flooding, demonstrate that the application will not increase flood risk to others, or demonstrate that flood risk can be suitably mitigated. In addition, the applicant has failed to demonstrate that the existing group of Oak trees, deemed worthy of retention will be unaffected by the development and has not made provision for their long-term protection.

Furthermore, no agreement has been completed with the applicant in respect of contributions towards the improvement of the public footpath, community uses or safeguarding existing uses.

The Highway Engineer has advised that additional sample tests and survey information are required in order to demonstrate that the scheme is acceptable in highway terms. This information has not been provided and as such, an objection is raised to the scheme on highway grounds.

It is therefore recommended that planning permission be refused for these reasons.

## **2. RECOMMENDATION**

### **REFUSAL for the following reasons:**

#### **1 NON2 Non Standard reason for refusal**

The scheme, including its size and design, fencing and floodlights, extent of hard surfacing and parking would fail to conserve and enhance the visual amenity of the Green Chain, contribute to the positive enhancement of the river corridor, or improve the character and appearance of the surrounding area. The proposal is therefore contrary to the aims of Policies EM2 and EM3 of the Hillingdon Local Plan: Part 1- Strategic Policies, Policies BE13 and BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy 2.18 of the London Plan 2011.

#### **2 NON2 Non Standard reason for refusal**

The applicant has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area. The proposal is therefore contrary to Policies EM3 and EM7 of the Hillingdon Local Plan: Part 1 "Strategic Policies" (adopted November 2012), Policies EC2, EC3 and EC5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy 7.19 of the London Plan and the NPPF.

#### **3 NON2 Non Standard reason for refusal**

The applicant has failed to demonstrate that the existing group of Oak trees which are of high visual amenity and ecological value will not be harmed by the development and has not made provision for their long-term protection. The proposal is therefore contrary to the aims of Policies EM2 of the Hillingdon Local Plan: Part 1- Strategic Policies and Policy BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

#### **4 NON2 Non Standard reason for refusal**

The applicant has failed to provide contributions towards the improvements of services and facilities as a consequence of demands created by the proposed development (in respect of upgrading of the public footpath, provision/refurbishment of football pitches and the upgrade of the existing running track and the securing of community uses). The scheme therefore conflicts with Policy R17 of the London Borough of Hillingdon Local Plan Part 2, and the adopted Supplementary Planning Document 'Planning Obligations.

#### **5 NON2 Non Standard reason for refusal**

The application fails to adequately assess the implication of the proposal on flooding, or demonstrate that the application will not increase flood risk to others. In addition, the application has failed to demonstrate that flood risk can be suitably mitigated. The proposal is therefore contrary to Policy EM6 (Flood Risk Management) of the Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policies OE7 and OE8 of the Local Plan Part 2 Saved UDP Policies (Nov 2012), Policies 5.12 and 5.13 of the London Plan (July 2011) and the NPPF.

## **6           NON2           Non Standard reason for refusal**

The proposed development fails to provide satisfactory information to demonstrate the estimated parking demand is acceptable. In absence of satisfactory information, the development could lead to additional on street parking, to the detriment of public and highway safety and is therefore contrary to Policies AM7, AM14, and R16 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

### **INFORMATIVES**

#### **1           I52           Compulsory Informative (1)**

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

#### **2           I53           Compulsory Informative (2)**

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (July 2011) and national guidance.

AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
BE13	New development must harmonise with the existing street scene.
BE19	New development must improve or complement the character of the area.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EC5	Retention of ecological features and creation of new habitats
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
R4	Proposals that would involve the loss of recreational open space
R5	Proposals that involve the loss of sports, leisure, community,

	religious, cultural or entertainment facilities
LPP 5.1	(2011) Climate Change Mitigation
LPP 5.10	(2011) Urban Greening
LPP 5.12	(2011) Flood risk management
LPP 5.13	(2011) Sustainable drainage
LPP 7.15	(2011) Reducing noise and enhancing soundscapes
LPP 7.17	(2011) Metropolitan Open Land
LPP 7.18	(2011) Protecting local open space and addressing local deficiency
LPP 7.19	(2011) Biodiversity and access to nature
LPP 7.21	(2011) Trees and woodland
LPP 7.24	(2011) Blue Ribbon Network
LPP 7.28	(2011) Restoration of the Blue Ribbon Network
NPPF	

### 3

The Local Planning Authority has actively engaged with the applicant both at the pre application and application stage of the planning process, in order to achieve an acceptable outcome. However, the scheme results in a number of fundamental planning concerns. Accordingly, the planning application has been refused.

## 3. CONSIDERATIONS

### 3.1 Site and Locality

The site forms part of Kings College Playing Fields and is Council owned. The applicants currently enjoy a long lease on most of the land subject to this application. The proposed development site covers an area of approximately 0.6720ha (6720m<sup>2</sup>.) The access to the playing fields is from Kings College Road.

The site is located to the north of the River Pinn, and is bounded to the west by Kings College Road and to the north by existing football pitches, beyond which are properties in Park Avenue. The site is designated Green Chain in the Saved UDP and District and Metropolitan Open Space in the Hillingdon Open Space Strategy 2011 - 2026 evidence base document.

The playing fields are characterised as open mown grassland with marked-out playing fields and is also well used by local residents for informal recreation. The Celandine Walk, a long-distance footpath through the Borough, runs approximately east-west between the River Pinn and the football pitches. A line of mature Oak trees extend on a north-south axis from the south-west corner of the open space. These trees are not protected by Tree Preservation Orders because they are situated on Council owned land. Along the western boundary there is a shelter belt of woody vegetation including hedges, which define the space and screen views of the Kings College Road. The Eastcote Hockey club house is located to the north east of the proposed pitch.

### 3.2 Proposed Scheme

The proposal seeks the construction of an additional all-weather sand dressed multi purpose sports pitch with associated floodlighting and fencing at the Kings College Playing Fields. The area of playing field proposed for the development is currently used for football matches and tournaments. The application is a resubmission of application ref:2414/APP/2011/2661, which was withdrawn on 30/1/2012.

The pitch would be located immediately to the south east of the existing club house and occupy an area of 101.4 x 63 metres, which inclusive of its fenced enclosure, would total 6,737 square metres. The proposed pitch would be similar in scale and appearance of the existing all-weather pitch, located to the south of the River Pinn. The proposed pitch would be enclosed by a 3.5 metre high fence, which increases to 4.5 metres in height behind each goal end.

The existing club car park would be extended to the south and the metal containers removed; however, it should be noted that the existing car park extension for approximately 3-4 spaces falls outside the current application site boundary and may require a separate application. A new car park to the east of the existing tree belt and accessed over a culverted ditch would be provided to accommodate a further 27 car parking spaces. Access to the pitch would be via a new footpath from the south east corner of the club house to the entrance to the pitch. 4 x 15 metre high floodlights are proposed on either side of the new pitch (8 floodlights in total), located approximately 1 metre from the perimeter fencing.

The fencing material specified is plastic-coated welded mesh panels, factory-finished in dark green. The fencing for the pitch would be 3.5m (reduced from the originally proposed 4m), with a 50 x 50 mm mesh for the first metre and 75 x 12.5mm mesh non-climb fencing for the top 2.5 metres. The fencing height will be higher, at 4.5 metres, above the goal ends. The base of the fence would be surrounded with a double height timber "kick" board, approximately 250mm high to rebound balls.

Surfacing for the car park and its access beneath the trees is to be installed using a non-dig method of construction. The proposed car park will consist of a permeable CellWeb Tree Root Protection system overlain with gravel, and the footpath will be constructed of CellWeb overlain with semi-permeable concrete block paving.

The applicants state that the proposed pitch is required to meet a growing demand for artificial multi-sport surface facilities, for the Hockey Club's youth section, local football clubs and many other clubs and schools that utilise the existing artificial multi-sport facility.

The application is supported by a number of reports that assess the impact of the proposal. A summary and some key conclusions from these reports are provided below:

#### PLANNING SUPPORTING STATEMENT

The statement sets out the need for the development, the objectives of the hockey club, lists the key concerns raised by local residents and sets out how the applicants have sought to address these issues.

#### DESIGN AND ACCESS STATEMENT

This report outlines the context for the development and provides an analysis of the layout, scale and access for the proposed development

#### ECOLOGICAL APPRAISAL

This report comprises a Phase 1 Habitat Survey and Protected Species Assessment and is based on a desk top study and field survey, providing an overview of the site's ecological interest. The evidence provided in the report suggests that the site loss of this area of grassland will have a negligible impact on the nature conservation value of the area. The report recommends that lighting is directed away from potential bat commuting routes, and the use of low or high pressure sodium lamps, instead of metal halide lamps.

#### FLOOD RISK ASSESSMENT AND ADDITIONAL LETTER DATED 5/2/2013

The assessment concludes that the flood risk to the site and surrounding area will not be increased by the development.

#### TRANSPORT STATEMENT

This document deals with the transportation issues relating to the proposed development and the effects that the development would have on the local highway network. It concludes that the impact of the development on the local and wider road network is likely to be insignificant.

#### TRAVEL PLAN

The Travel Plan measures are aimed at trying to reduce the number of single occupancy car trips made by club members on match days, where there are existing parking problems. Journeys to training sessions are often made after work, and the applicants consider it impractical to try and influence travel to these training sessions.

#### TREE SURVEY AND ARBORICULTURAL IMPACT ASSESSMENT

The survey assesses the quality and value of 20 individual trees and 3 groups of trees which are on, or close, to the site.

#### NOISE ASSESSMENT

The study seeks to establish the impact of noise arising from the proposed facility on the surrounding area. The report concludes that there are no identifiable noise impact issues arising from the use of the facility.

#### FLOODLIGHT SPECIFICATION

The report assesses the types of luminaires proposed. There are 2 switching modes, 500 Lux and 350 Lux. The report includes a lighting iso-contour diagram showing light spill from the proposed floodlights.

### **3.3 Relevant Planning History**

#### **Comment on Relevant Planning History**

The meadows were given to the then Urban District Council of Ruislip - Northwood by the Provost and Scholars of The Kings College of Our Lady and Saint Nicholas in Cambridge, for purposes of public walks and pleasure grounds and for the purposes of cricket, football or other games, including a swimming pool. The London Borough of Hillingdon, as successor to the Urban District Council now controls the area.

Eastcote Hockey Club has used the playing fields since 1964 and the site has an extensive planning history. A redgra pitch on the site of the existing all weather playing pitch was constructed over 25 years ago. An application for the erection of eight floodlight pylons around the pitch was then approved on 19/11/74 (ref:24114/74/1390). Conditions were attached to this consent which restricted the floodlights to 5 days per week (Monday-Wednesday, Friday and Saturday) and to the hours of 19:00-21:00 hours on those days.

A subsequent application was approved on 17/9/76 (ref:24144/76/875), to relax the hours of use of the floodlights. Planning permission was approved for chain link fencing around the pitch on 20/4/91 (ref:2414S/90/1905).

Planning permission was granted on 14/8/1996 for the replacement of the redgra sports pitch with a sand filled synthetic grass sports pitch, enclosure of the pitch with a part 2.5, part 4 metre high fence (ref:2414W/96/526). An application to increase the height of perimeter fence of the astroturf pitch to 4 metres was approved on 7/10/1998

(ref:2414/AF/98/0748).

Planning permission for a fenced skate park facility, adjacent to the running track was approved on 18/3/2004 (ref:2414/APP/2004/445).

Two similar applications to the current scheme, refs: 2414/APP/2010/2676 and 2414/APP/2011/2661, but without the additional car parking, were withdrawn before determination by the applicant on 22/2/2011 and 30/1/12 respectively, when it was clear that these applications were to be recommended for refusal. The current application has been submitted in an attempt to overcome previous concerns.

#### **4. Planning Policies and Standards**

##### **UDP / LDF Designation and London Plan**

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM3 (2012) Blue Ribbon Network
- PT1.EM4 (2012) Open Space and Informal Recreation
- PT1.EM5 (2012) Sport and Leisure
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.T1 (2012) Accessible Local Destinations

Part 2 Policies:

- AM14 New development and car parking standards.
- AM15 Provision of reserved parking spaces for disabled persons
- AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
- AM7 Consideration of traffic generated by proposed developments.
- AM9 Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
- BE13 New development must harmonise with the existing street scene.
- BE19 New development must improve or complement the character of the area.
- BE38 Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
- EC2 Nature conservation considerations and ecological assessments
- EC3 Potential effects of development on sites of nature conservation importance



EC5	Retention of ecological features and creation of new habitats
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
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NPPF	

## 5. Advertisement and Site Notice

**5.1** Advertisement Expiry Date:- **14th January 2013**

**5.2** Site Notice Expiry Date:- Not applicable

## 6. Consultations

### External Consultees

The Notice of Proposed Development was advertised under Article 13 of the Town and Country Planning (Development Management Procedure) (England) 2010 and 781 neighbours and local amenity groups were consulted in the surrounding area. Site Notices were posted at the site.

462 individual letters of objection (92 letters/e-mails and 370 internet responses), together with a petition bearing 5,200 signatures, have been received, objecting to the planning application.

In addition, objections were received from Eastcote and Ruislip Residents Associations, Ruislip Village and Eastcote Conservation Area Panels, Ruislip, Northwood and Eastcote Local History Society and a local action group, Friends of Pinn Meadows.

The principle areas of concern are:

1. Support the guidance of the GLA on the importance of protecting Metropolitan Open Land, outlined in the London Plan
2. Please note the designation of the area in question in Hillingdon's LDF as Metropolitan Open Land
3. Think it outrageous that anybody should claim for their sole use, land that is common property.
4. Fencing off this land is totally unacceptable, both in terms of aesthetics as well as in concept.
5. There are already two underused facilities locally.
6. The fields were for the people of Ruislip not for a quasi National Hockey Centre.
7. More facilities would be needed at the clubhouse with the extra pitch.
8. Loss of amenities and change of character of a protected area.
9. Increased congestion.
10. A public rural site would become commercial
11. Object to use of our public open space for the exclusive use and profit of a private members club.
12. The site in question, bordering the River Pinn is flood plain zone 3 and has in the past been underwater.
13. It is not the site for a sports complex on an industrial scale, there is no justification for two enclosed and floodlit astro pitches and the associated turmoil it will cause to traffic congestion,
14. Noise, light and litter pollution.
15. The car park adjacent to the astro pitch is referred to as private. This however is not the case, although kept locked for security with EHC as the key holder, it was a public car park and was only locked after fly tipping and boy racers had accessed the field around the site.
16. There are large mature Oaks to the NW corner, the roots of which would be disturbed by the development and Willow bordering the river on the SE corner.
17. The River Pinn is an important corridor for wildlife, Bats are very active along it and along the treelines, Egrets and Kingfishers are regularly seen.
18. The Celendine Route runs along the River and is promoted by the Council as a route through, Green Spaces, Conservation areas and Wildlife Havens. It would I'm sure spoil it if the council had to add, along a narrow corridor between 4m high security fencing and when in use being blinded by 500lux floodlights on a total of 14 columns.
19. Oppose is the greedy enclosure of another astro pitch thus excluding the public permanently from this much loved and used open space.
20. The obvious site for a facility like this if it were needed would be an educational establishment such as already exists at Harefield Academy and Brunel University. It could then be used and managed all day and evenings when required.
21. This area will become confined to the exclusive use of those who play the relevant sports associated with it. It will be overbearing as a construction,
22. The additional floodlit area will be detrimental to those living nearby.
23. The increased numbers of cars will no doubt lead to them putting in a subsequent application to provide more off street parking, therefore requiring more of the fields to become hardstanding.
24. I think the plan is totally inappropriate and will have a negative effect on this very valuable open area enjoyed by many for multi-use, and valuable as a wildlife corridor.
25. The £150,000 subsidy to build this unnecessary facility will come from our council tax.
26. Outraged by the infringement of the public right of way across this field.
27. King's College Cambridge gave this land to the then Ruislip-Northwood District Council, I believe in the 1930s, for the enjoyment of the people of Ruislip, not for the land to be leased by the present Council to a hockey club, for mutual financial gain.
28. Some remedial ground drainage work had taken place to this area at some time in the recent past.
29. A small amount of investigation has since shown that indeed perforated plastic pipes are buried at about 250mm below the surface. The fact that plastic has been used would suggest that the work was done in recent years.
30. The area in question does not naturally drain easily and that remedial work has been necessary

to improve the drainage for this area of our playing fields. No mention or reference has been made of these ground drains. Any groundworks will come into conflict with these existing remedial ground drains.

31. Plans do not show the whole area that is intended to be developed
32. Existing pitch is underused - there is not the demand for an additional pitch
33. Will have an unacceptable impact on visual amenity
34. Local community do not want the development
35. The public open space is protected by a covenant - the land is to be used by the people of Ruislip - not for private use
36. Traffic and parking congestion
37. Proposed car parking layout is unacceptable
38. Impact on ecology
39. Loss of mature trees
40. Reports are inaccurate, insufficient and out of date
41. Development would impact on public right of way and access to footpath (Celandine Route)
42. Increased flood risk
43. Noise impact
44. Light pollution from floodlighting
45. Loss of public open space
46. Will restrict use to Eastcote Hockey Club members - area will be fenced off
47. Planning application fails to conform with Council's validation procedures
48. Development contravenes National and Hillingdon Policies
49. The land is designated as a Green Chain and Blue Ribbon Network
50. There are better uses of Council funding
51. There are other more suitable sites e.g. school playing fields
52. Safety concerns for users of footpath between fence and River Pinn
53. Anti-social behaviour
54. No mention of accessibility for wheelchair users
55. No provision for sporting facilities for the disabled.
56. Litter
57. Would dominate the surrounding residential area
58. Negative impact on property values
59. Majority of club members live outside the borough
60. Impact on football club opposite
61. Hockey Club only lease the land, they do not own it.

#### PETITIONS

1. A petition bearing just over 5,200 signatures has been received. The signatories object on the following grounds:

We the undersigned object to Eastcote Hockey Club plans to fence off another area of Kings College Playing Fields. These are public playing fields for the benefit of the whole of the community and not just for the exclusive benefit of Eastcote Hockey Club. Parking congestion can only get worse if these plans are allowed to go ahead, as well as problems with visual impact, noise, light pollution as well as loss of a valuable public amenity.

2 petitions have been received in support of the application, one bearing 534 signatures (online petition) and the other bearing 65 signatures. The 65 signatories support the proposals on the following grounds:

Eastcote Hockey Club has submitted a revised application to build a 2nd Astro turf pitch on our grounds outside our clubhouse at Kings College Playing Fields. The second pitch will allow the club to play all its home games at the club on Saturdays and carry out all of our youth coaching and matches at the club on a Sunday so we can cope with the ever-increasing number of youngsters who want to join in.

Approval of the 2nd pitch would enable us to make those facilities available to the community, building on our already successful engagement with local schools and other sports clubs. Ruislip Rangers will continue to use the grass pitches for junior football and the running track will be upgraded and maintained in the future for free community use.

#### LETTERS IN SUPPORT

107 letters of support have been received to the public consultation.

1. Support Olympic legacy
2. Will improve and increase sport facilities
3. Parking issues not just from the hockey club
4. Noise increase would be minimal
5. Need a new pitch to accommodate large number of members
6. Keeps youngsters off the street
7. Will allow matches in wet weather
8. Pitch would only use a small amount of land
9. Junior teams would benefit from a second pitch
10. Will reduce car journeys to other venues
11. Would benefit youngsters and the community
12. The playing fields are designated as an outdoor sports facility

7 letters commenting on the application were also received:

- Pinn Meadows should be granted Village Green status
- Regenerate the running track
- Application was submitted over Christmas when people might have been too busy to comment
- Upgrade the existing pitch

#### SPORT ENGLAND

It is understood that the site forms part of, or constitutes a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No. 2184), in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more, or that it is on land that is allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement.

Sport England has therefore considered the application in the light of its playing fields policy. The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area. The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. The policy states that:

"Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies".

Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities.

Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country.

The application proposes the construction of an all-weather, sand dressed multi-purpose sports playing pitch on existing grass playing field land. It is proposed that the pitch will be 101.4m x 63m in size. The application is the resubmission of application refs 2414/APP/2010/2676 and 2414/APP/2011/2661 which were both withdrawn.

As expressed previously in relation to the applications mentioned above, Sport England is keen to ensure that the interests of both hockey and football are represented as part of the proposed development. In this respect, Sport England sought a planning condition be imposed on the previous application seeking that a community use agreement be submitted for the site. In addition, and in order to address the loss of grass pitches available to football, as a result of the development, the applicant had previously agreed to enter into a S106 agreement, committing to refurbish, and subsequently maintain, the full size pitch within the existing running track and the running track on the adjacent site. The applicant also offered to lay out of five grass pitches on the site (3 mini & 2 youth/full) and the grant access by Eastcote Hockey Club to Ruislip Rangers JFC. These were all important factors in considering the previously application.

The current application seems to remove these previous commitments, which is of concern to Sport England. We would urge the applicant to reconsider and commit to the same undertaking as part of this application, unless these arrangements have already been secured through other means, outside the planning process i.e. a lease.

Sport England therefore seeks some clarity from the applicant as to whether they will continue to commit to laying out of the five grass pitches and granting access to Ruislip Rangers JFC. We also seek clarity on whether the athletics track pitch will be refurbished and thereafter maintained.

Upon receipt of further clarity, Sport England formally requests the opportunity to comment further. Without the clarity sought above, Sport England is unable to confirm that the proposed development still meets exception E5 of it's a playing field policy which states:

E5 - The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.

#### ENVIRONMENT AGENCY

Thank you for consulting us on the above application. We are in agreement with Natural England that the submitted documents are not adequate to assess the impacts on the River Pinn and associated ecology and therefore we object to the proposed development.

If you are minded to approve this application contrary to our objection, I would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed below be overruled, we would require the imposition of conditions to be included on any subsequent approval, including to address flood risk.

#### Objection

We object to the proposed development as submitted because the assessment and mitigation of the risks to the River Pinn and associated ecology are inadequate. We therefore recommend that the planning application is refused. We will maintain our objection until the applicant has supplied information to demonstrate that the risks posed by the development can be satisfactorily addressed. We wish to be consulted on the results of any survey submitted in connection with this application, or on any design changes, additional mitigation, compensation or enhancement measures that might subsequently be proposed.

#### Reasons

The assessment/mitigation measures submitted with the application are inadequate and do not properly address the risks. In particular, the proposals do not:

- Address the high levels of light spill into the river corridor and buffer zone. The river corridor and buffer zone should be intrinsically dark (0-2 lux). The submitted light spill plans show levels in excess of 100 lux in places. The application also fails to address the cumulative impact of light spill from the existing pitch.

- Take account of the revised proposals. The submitted Ecological Appraisal report (prepared by ecoconsult ltd; dated November 2010) has not been updated to reflect the changes to this application from the previous one. The report makes no reference to the impact of light spill on the river corridor, buffer zone and associated species (including fish).

- Adequately address the risks to protected species that may be affected by the proposals. As bats could be affected (particularly by high light levels) and are a protected species, the applicant should undertake a bat survey. The presence of bats or other protected species will inform what measures the applicant will need to take at the site.

Government policy on minimising impacts on biodiversity is set out in the National Planning Policy Framework paragraph 118, which requires local planning authorities to aim to conserve and enhance biodiversity when determining planning applications. This has not been demonstrated in the present application.

The River Pinn and its buffer zone are designated as a Site of Importance for Nature Conservation, as a Green Chain in Hillingdon's Local Plan, and is also recognised as part of the All London Green Grid and Blue Ribbon Network. These designations acknowledge the importance of such local green infrastructure, both for wildlife and amenity value.

A fish survey carried out by the Environment Agency on the River Pinn in 2011 found eight species of fish at Copthall Road Footbridge (approximately 3.5 kilometres from the site). Fish spawning sites can be particularly affected by high light levels, and the Ecological Appraisal fails to recognise this risk.

This objection is backed up by Hillingdon's Local Plan: Part 1 "Strategic Policies" (adopted November 2012) EM2 (Green Belt, Metropolitan Open Land and Green Chains), EM3 (Blue Ribbon Network), EM7 (Biodiversity and Geological Conservation) and EM8 (Land, Water, Air and Noise).

#### Overcoming our objection

The applicant must demonstrate what measures have been taken to reduce the level of light spill into the River Pinn corridor and buffer zone. If, after all reasonable measures have been taken, there are still detrimental impacts on the river corridor, buffer zone or species, the applicant must alter their plans to reduce the impact or they may be able to provide compensation for the impact of the development. This could include a contribution to on-site or off-site enhancement of another stretch of the River Pinn.

The applicant must update the Ecological Assessment to take account of the revised application proposals. A review of the potential impacts of light spill should be addressed in the report.

The applicant should undertake a bat survey, ensuring that they follow the relevant Natural England guidance. If protected species are present, this will require the plans to be amended accordingly.

ADDITIONAL RESPONSE (6 March 2013): We maintain our objection as the submitted information has failed to address our concerns for the reasons outlined below.

It is not clear from the submitted documents exactly how the revised light spill figures have been achieved. The revised report and light spill diagram can be fairly technical, and it is not clear whether our concerns have been addressed. Given this, we require a non-technical summary of the following:

- The expected light spill levels in the River Pinn corridor and buffer zones solely from the lighting from the new pitch (excluding mitigation measures).
- The expected light spill levels in the River Pinn corridor and buffer zones including new pitch lighting, ambient light, plus light from the existing pitch (excluding mitigation measures).
- Times and weather conditions when readings have been taken.
- Mitigation measures proposed to reduce the light spill into the river corridor and buffer zones. This should include any measures proposed for the existing pitch lighting.
- The expected light spill levels in the River Pinn corridor and buffer zones including new pitch lighting, ambient light, plus light from the existing pitch (including mitigation measures).

## NATURAL ENGLAND

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our comments in relation to this application are provided in the following sections.

### Bats

There is the potential for indirect impacts upon bats to occur from this development as a result of the floodlighting proposed. We note that no specific bat surveys have been undertaken of the site to ascertain the species that may be using the river corridor for feeding and commuting or their relative abundance. We note that a post construction light contour plan has been provided but there does not appear to be a comparison with the current light levels at the site. Consequently Natural England recommends that the following information is obtained from the applicant before determination of this application:

- Details of the current light levels at the application site and adjacent river and tree corridors;
- Details of the periods of the day the floodlighting will be used and how this will vary seasonally;
- Details of the indirect impacts that may result from this scheme upon bats; and
- Detailed mitigation measures that are to be implemented to avoid, minimise and compensate for any impacts that are identified in relation to bats.

This information may require further survey information to be collected in relation to bats.

### Great crested newts

From Ordnance Survey maps, it appears there are two ponds within approximately 500 metres of the application site, one to the north and one to the east. As such, Natural England recommends that further clarity is provided from the applicant as to the likelihood of great crested newts being impacted by this proposal. Such information should be provided before determination of the application.

### Badgers, breeding birds, water voles and widespread reptiles

The information supplied in support of the application highlights the potential impacts resulting from this proposal upon badgers, breeding birds, water voles and widespread reptile. Detailed advice on survey effort and mitigation requirements for these species can be found within our protected species standing advice available from <http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx>. In accordance with our standing advice, we recommend that you consult the standing advice to establish whether sufficient survey effort has been undertaken to fully assess the impacts of this proposal along with the appropriateness of any necessary mitigation measures proposed in

respect of these species.

## RUISLIP RESIDENTS ASSOCIATION

When this application was discussed at our last Executive Committee meeting on 02/01/13 there was unanimous opposition to the proposal. The reasons were as follows:

1. Loss of public open space: Kings College Playing Fields were conveyed to then Ruislip-Northwood Urban District Council in the 1930s with the intension that they be used as and for Public Open Spaces. EHC have already secured one field for their exclusive use. They should not be allowed any more.

2. Impact on visual amenity: The recently adopted All London Green Grid (ALGG), the Hillingdon Local Plan (LP) and Hillingdon Landscape Character Assessment (HLCA) stress the importance of the Borough's open spaces, river corridors and landscape. They also set out guidelines on how these assets should be conserved and enhanced.

The objectives of the ALGG include the following:

- "conserve and enhance heritage features and landscape" and "conserve and enhance the Thames and its tributaries and riverside spaces" (page 2)
- "increase biodiversity through the creation of a matrix of riverine, grassland, woodland and wetland habitats and landscapes. Support river naturalisation and water habitat improvement projects especially along the banks of River Crane, Yeading Brook and River Pinn" (page 24).
- "the River Pinn has an individual identity" (page 69)

In the LP, clause 8.2 recognises the main challenge is to protect the Borough's Green Belt, Metropolitan Open Land and Green Chains whilst supporting the balance of continued growth, without spreading into these open areas, keeping land permanently open and free from development.

Policy EM2: any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area, conserve and enhance the visual amenity and nature conservation value of the landscape, encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area and retain the openness of the green chain.

The HLCA recognises the importance of the River Pinn Corridor, and makes the following recommendations:

- the Strategy/Vision is to "conserve and manage the tranquil and intimate character of the river corridor"
- the Guidelines include "Conserve and protect the open character of farmland and meadows, with long open views". Please note that the example of a long open view, in the illustrations following page 116, is a view across the application site (see Appendix 1)
- "restrict development along the river corridor, particularly vertical development which will greatly impact on the low lying, open character".

The proposed new pitch is in direct conflict with the above policies.

3. Celandine Route: the ALGG recommends "promote and enhance the Celandine Walk along the River Pinn" and "open river views to make the Route more inviting" (page 39, item 10.06.08). The proposed new pitch will not enhance the Celandine Route. This route was developed in partnership with the LB Harrow and the Ramblers Association. Please ensure that both partner organisations are consulted about this application.

4. Trees: the existing belt of mature (and heritage) trees on the west boundary provides an



attractive border to the long open view across the meadow. It is unacceptable that this latest proposal should include the removal of any of these trees. Also the construction of a car park beneath the trees would have a detrimental effect on their root system.

5. Ecology: We note the report by Ecoconsult is dated November 2010, and presumably relates to the first planning application in 2010. This document should be updated to take account of the many concerns expressed on the two previous applications and also the design changes in the current proposal.

6. Traffic and parking: notwithstanding the findings in the Traffic Assessment, Kings College Road is regularly heavily congested on match days. Whilst the proposed parking might help to alleviate this to some degree we note it is intended to be for the exclusive use of the Club. Added concerns are:

- further incursion and enclosure of public open space for private use
- loss of trees (see above)
- single point of access and egress with a pinch point between the existing and proposed areas
- increase noise and pollution

7. Flood risk assessment: the application site is in a Zone 3b flood plain. There are still concerns about the adequacy of the proposed fencing around the pitch and the likelihood that in a flash flood water will be diverted to surrounding area. The experts may consider the risk minimal but this view may not be shared by insurance companies.

One of our members has recently been faced with a substantial increase in the flood risk excess on their policy and rejection by several other insurers as their property is in a flood zone. We believe this is something officers should give serious consideration to before allowing any development on the Fields.

Whilst sports fields are considered an appropriate development in flood plains we question the advisability of constructing a synthetic pitch in one. The Football Association advise against locating synthetic pitches in areas at risk of flooding and Sport England recommend caution. Both organisations warn against the high cost of refurbishing a pitch damaged by flooding.

8. Floodlighting: the light spill from the existing pitch extends a considerable distance beyond the boundary fence and into and beyond the river channel. It is difficult to see how the same situation would not be replicated by any new installation.

The existing lighting intrudes on the night sky scene and the dark zone along and around the River Pinn Corridor. The proposed new lighting would have a further detrimental effect on this area.

9. Need: In their Design and Access Statement EHC claim they need the additional pitch to accommodate the limited number of home matches they are obliged to currently play at other local pitches i.e. Brunel and Harefield Academy. They also state a wish to provide additional training facilities for their Colts team and local schools.

Clarification is required on why the Club's fixtures and training schedules cannot be rearranged to accommodate a more effective use of the existing pitch. For instance it is noticeable that currently the pitch is used on a number of occasions by footballers (not hockey players). Also it is unused on weekdays between 9.00-17.00 hours, with the exception of two short afternoon sessions by schools from Harrow.

The Club also refers to the new pitch providing facilities for local schools. There does not appear to be any demand at present from any of the local Junior and Comprehensive schools, in which case a second pitch is unlikely to be used for these purposes. The existing pitch is currently unused for

50% of the useable time i.e. 9.00-21.30 hrs and the same would more than likely apply to a second pitch.

10. Olympic legacy: Ruislip Residents Association applauds the encouragement of sporting activities, particularly for young people, and we would be pleased to support EHC in any future plans for expansion on an appropriate site. However, we note that EHC moved from Cavendish playing fields to take advantage of the larger number of grass pitches afforded at Pinn fields, but that since that relocation Hockey has evolved to play exclusively on artificial pitches, for which the current site is entirely unsuitable.

11. Conclusion: Kings College Fields are a precious asset for both Ruislip and the wider area. The EHC's proposals are completely out of character with the major part of the Fields, they are not justified and they would have a disastrous impact on the local amenity. The application should therefore be refused.

RE-CONSULTATION RESPONSE: Natural England has previously commented on this proposal in our letter dated 07 January 2013. The additional information provided relates to flood risk, car parking, aboricultural reports, and planning obligations and is unlikely to have significantly different impacts on the natural environment than the original proposal.

However, we note the letter dated 5 February 2013 from DPP referring to further ecological survey work to be completed and await further consultation. Should the proposal be amended in a way which significantly affects its impact on the natural nvironment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

#### EASTCOTE RESIDENTS ASSOCIATION

On behalf of the Eastcote Residents Association, I am writing in support of the Friends of Pinn Meadows, Ruislip Residents Association, Ruislip Village Conservation Area Advisory Panel, Ruislip, Northwood & Eastcote Local History Society and Eastcote Village Conservation Advisory Panel.

From these organisation, you have received very detailed objections and thus there is no purpose in repeating them all here.

However, in sum, we agree with the views that they have expressed in relation to the detrimental effect that such a construction would have in conservation and ecological terms, not just at Kings College Playing Fields, but also in the wider area.

We also endorse the view that our local community will be best served if we can continue to have general free access to the area, thus allowing us to pursue a wide range of different activities and ensuring that the habitat of the wildlife is preserved. This application creates a large fenced off area that restricts access to the few (who have to pay) and that can only be used for specific, prescribed purposes.

We ask that this application be refused.

#### EASTCOTE VILLAGE CONSERVATION AREA ADVISORY PANEL

The Pinn Meadows form both a Green Chain and a Blue Ribbon. The Hillingdon Meadows begin at Cheney Field and Long Meadow Eastcote and follow the Pinn to its joining with the River Frays. These rivers form part of the Colne Valley Catchment, which is currently working to improve rivers and river corridors in line with the European Water Framework Directive. A Holistic approach should be taken to consider effects of changes made in part of the corridor upon another.

Eastcote Village Conservation Area Advisory Panel is very concerned that this proposed application will be detrimental to Kings College Playing Fields, situated in the Eastcote/East Ruislip Ward London Borough of Hillingdon, in particular and to the river corridor in general, we write in support of our colleagues, The Friends of Pinn Meadows, Ruislip Residents Association, Ruislip Village Conservation Area Advisory Panel, Ruislip, Northwood & Eastcote Local History Society.

Please find below our objections to this application:-

1. The Ecological Appraisal carried out by Ecoconsult, dated Nov 2010, was found wanting when submitted for the previous application. The time of day and duration of the site visit is not published, nor the weather conditions and light value at the time of the visit. This appraisal is now more than 2 years old and the changes made in this current application have not been taken into consideration, therefore the appraisal is totally incorrect and should be disregarded.

- A Bat Roost has been recorded, and therefore before this application can be determined a full bat survey is required. This can only be started in May after the hibernation period.

- Guidance from the Bat Conservation Trust states, that artificial light will disturb bat roosts and feeding patterns. Bats are creatures of habit and always return to previous roost sites, both maternity and hibernation. The proposed floodlights will be too close the bat roost in the tree line near to Kings College Road. Long Eared Brown Bats are recorded as roosting at Eastcote House Gardens, their foraging distance is 2 kilometres. These bats are very light sensitive and will be disturbed by the proposed lighting.

- The proposals to clear the tree line and install a car park are not acceptable. This tree line is of local nature conservation importance to both birds and bats. The Oak trees within this tree line will suffer root damage and canopy reduction to stop over hanging onto the proposed pitch. Some of these trees are at least 300 years old, heritage trees.

- There are many other omissions in this report such as ponds not recorded etc. A new appraisal should be commissioned to include a full bat survey before any determination is made. Please see Woolley V Cheshire and circular 06/05 paragraph 99, and Natural England Guidance. All of which agree surveys of protected species must be made before determination they cannot be added as a condition to planning permission to take place before work starts.

2. Arboricultural Impact Assessment. Submitted by Patrick Stileman Ltd. Dated November 2012.

- This assessment does not show that the removal of G2 will result in the removal of 40 young trees, in an area that is of local nature conservation importance.

- The mature Oak Tree 2, will because of the proximity of the proposed pitch suffer root damage, and will probably in the future cause damage to the pitch. The overhanging canopy is recommended to be cut back slightly. The actual cutting back would be some 3 metres, and to prevent over hanging in the future regular cutting back would be required, thus weakening this mature oak.

- The proposed car parking arrangements will mean cars constantly parked on the root protection areas, this will cause damage to the tree roots.

- Tree 4 Sycamore, to be removed, to make way for the car park. It is suggested that a new oak tree be planted between trees 5&6. Any new tree introduced here will not thrive as it will be underneath the canopy of trees 5&6. We do not agree with these suggestions.

- Tree 15 Ash, this tree is shown on the car parking layout drawing EHC-PSP-01 with a parking space for a disabled driver against the trunk of the tree this is not acceptable.

- Tree 6 Mature Oak, this tree does have a bat roost, identified by Ian Cantley Ruislip Woods Trust during the summer 2012. This tree will overhang the car parking area and there is likely to be pressure to cut this tree back.

- Tree 8 Mature Oak some 300 years old will come under pressure with a pathway being laid over its roots.

3. Planning, Design & Access Statement, submitted by DPP on behalf of Eastcote Hockey Club. This statement relies heavily on the Ecological Appraisal, Tree Appraisal and the report of the

Planning Officer for the last application which was withdrawn therefore never determined.

- The Ecological Report and the Tree report have been discussed above.
- This application should be judged against the following policies of the Hillingdon Local Plan adopted November 2012.
  - Policy EM2. Any proposals for the development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation values of the area and retain the openness of the Green Chain. It must also be noted that in compliance with the London Plan all Green Chains will be classed as Metropolitan Open land in the near future.
  - This proposed Hockey pitch will be totally against the above policy. The current fenced hockey pitch has taken one meadow out of public use. The proposed site is open for use by all, in accordance with the wishes of Kings College Cambridge when this land was gifted to the people of Ruislip. If built, this hockey pitch will only be available to fee paying members; all other members of the public will be excluded. The nature conservation of the area will be destroyed.
  - Hillingdon Landscape Character Assessment, section LCT G River Corridor, describes this River corridor as a tranquil and intimate character, despite the close proximity to dense urban development.[page 109] Page 129 Landscape guidelines point 8 Restrict incremental development along the river corridor, particularly vertical development, which will impact on the low lying, open character.
  - This current proposal will greatly impact on the important linear views across the meadow. [this is shown in the LCA] The height and density of the fencing will completely change the character of the Meadows. The tranquil and intimate character will be lost.
  - Policy EM3 Blue Ribbon Network. The Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through the Biodiversity Action Plan. The River Pinn is of District Importance and forms part of the Celandine Route.
  - The Celandine Route runs the whole length of the Pinn giving all members of the public access to walks in the countryside, it links to the Hillingdon Trail. It also links the heritage sites of Manor Farm. This section of the Celandine Route will become restricted with a football pitch at one end of the Meadow, and the high fencing of the Hockey Pitch at the other. The character of the route will be caused demonstrable harm.
  - Policy EM4 Open Space and Informal Recreation. The council will safeguard and extend the network of open spaces, informal recreational and environmental opportunities. There will be a presumption against any net loss of open space in the Borough.
  - Policy EM4 is supported by Hillingdon Open Space Strategy. The Hillingdon Open Space Strategy [OSS] September 2011, states four times that Eastcote and East Ruislip Ward does NOT reach the quantity of required open space. Ruislip with Eastcote House Gardens. The proposed hockey pitch and the reconfiguration of the layout of the existing football pitches will severely disrupt this section of the Celandine Route. The proposed football pitch at the top of the meadow will encroach onto the Celandine Route, there is a mature willow at this point and there will be pressure to either severely cut back or remove this tree
  - OSS page 23. 4.2.1. Priorities for action. All open space. There would appear to be deficiencies in Townfield, Uxbridge North, Eastcote/East Ruislip and Northwood Wards .Page 24. again, Eastcote/East Ruislip Ward is quoted as being deficient. Page 34. Eastcote and East Ruislip Ward has insufficient quantity of open space to meet the quantity standard. Page 34. a further 33 hectares of unrestricted open space is required by 2026 to meet the standard and the expected population growth.
  - The fact that Eastcote and East Ruislip Ward is already deficient in open space, and needs an increase of a further 33 hectares by 2026, is another planning reason to refuse this application. It is recognised that this area is part of the River Pinn Corridor, according to the OSS Green Corridors primary purpose is for walking, cycling, horse riding whether for leisure purposes or travel and for opportunities for wildlife migration.

· The key words in the Open Space Strategy are Unrestricted Open Space. This proposal would cause open space currently available to all to become Restricted Enclosed Space, available only to fee paying members.

· The Mayor of London, All London Green Grid. This initiative is to increase the green areas around all urbanization, to improve river corridors. The Colne Catchment currently being organized in conjunction with DEFRA, to comply with the European Water Framework Directive includes the River Pinn. The scheme is to improve the ecology of all open spaces and river corridors. The Pinn meadows are water meadows, their purpose to act as a flood plain, Kings College Playing Fields are listed as level 3b flood risk. The Flood Risk Assessment for this proposal does not provide any land drainage, stating the pitch will be permeable, but there needs to be land drainage to avoid standing water. The proposed car park and the concrete surround to the pitch will be at higher levels than current, thus causing extra risk of flooding.

· DPP quote the National Planning Policy Framework. A presumption in favour of sustainable development. They have not demonstrated that this proposal is sustainable, in fact it will cause demonstrable harm to the area, it will cause more urbanization of the meadows. It has not been proven that the need for the hockey club to be able to play one or two matches at home is a greater need than the local residents and wildlife who currently have free access to the meadows for a variety of pursuits, and suitable habitat for many species of wildlife.

This proposal is contrary to Policies EM2, EM3, EM4, Mayor of London, All London Green Grid. We request that the application be refused. Action should be taken by the London Borough of Hillingdon, to secure this area from any form of development now or in the future.

#### RUISLIP VILLAGE CONSERVATION PANEL

The panel is opposed to the application for the following reasons:

i) The area concerned is part of a Green Chain and a Blue Ribbon Network under the terms of the Hillingdon Local Plan (adopted November 2012) and is public open space as defined in the Hillingdon Local Plan pt 1, Strategy Policies, 8.41 pg.97.

ii) A fenced pitch would exclude the general public from a large area of King s College Playing Fields that is defined as public open space and a new fenced Astroturf pitch would contravene the aims of the Green Chain Policy EM2. A piece of land covered in Astroturf might as well be covered in tarmac so far as wildlife is concerned.

iii) The Borough s Open Space Strategy states that East Ruislip and Eastcote Wards have less unrestricted open space then is required. A fenced pitch would restrict it still further. Floodlighting would be detrimental to wildlife.

iv) The planned new car parking facilities is likely to cause root damage to mature trees surviving from one of the hedgerows that once divided these fields. I understand that one of the mature trees is home to a bat roost.

#### LONDON ESSEX AND HERTFORDSHIRE AMPHIBIAN AND REPTILE TRUST

The Applicant has failed to take account of the possibility that protected species are present within the footprint, specifically the presence of great crested newt *Triturus cristatus* (with proven presence within 500m at Park Wood TQ097888 and Highgrove Wood TQ103882, record date - spring 2012) as well as possible presence given habitat suitability and connectivity with other sites of grass snake *Natrix natrix*, water vole *Arvicola terrestris* and various species of bat. All the aforementioned species receive protection from killing and injury even during the course of an otherwise lawful development and in addition habitat protection is specifically afforded to crested newt and water vole. The pond within Kings College Playing Fields (GR TQ093881) could also be used for breeding by crested newts and therefore should be surveyed by an expert in the spring when adults may be expected to be present. The Council has an obligation to protect biodiversity and the area of meadows, riparian habitat and the pond within the fields represents a valuable component of the Borough's biodiversity which would be damaged by the proposal.

#### RUISLIP, NORTHWOOD AND EASTCOTE LOCAL HISTORY SOCIETY

This development is totally inappropriate for a designated 'green chain' area. It should be left as open grassland for all the community to enjoy.

#### RAMBLERS ASSOCIATION

No response received.

#### WOODLAND TRUST

The National Planning Policy Framework paragraph 118 states planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Research has shown that tree roots extend up to 2.5 times the radius of a tree's canopy. To minimise potential damage to veteran trees we recommend that a root protection zone of 15 times the diameter of the trunk is used during the construction phase. Further guidance can be found in the handbook Veteran Trees-a guide to good management, published by Natural England. We recommend that as the root protection zones are to be impacted upon that as a minimum the guidelines set out in BS 5837 should be strictly adhered to at all times.

The Woodland Trust objects to any proposals which will cause the loss of veteran trees on site.

#### NORTHWOOD HILLS RESIDENTS ASSOCIATION

No response received.

#### METROPOLITAN POLICE CRIME PREVENTION ADVISER

The fence is clearly see-through (except at oblique angles) and the land/route in question is long and straight, so that people, youths and dogs can be seen well in advance, should avoiding action wish to be taken. Obviously if the pitch and fence was not there, avoiding action would undoubtedly be made easier, but it is not considered that the risk justifies the project not going ahead on 'crime concerns'.

Incidents involving youths, dogs and anti-social behaviour can happen anywhere in a public space or park and individuals would need to access the risk of it themselves, with regard to their own sensibilities. If one was of a particularly nervous disposition perhaps this could be a walk to be avoided, but again I do not feel that this alone should be a reason for objecting to this proposal.

#### NICK HURD MP

I am writing on behalf of a large number of constituents to object to the planning application 2414/APP/2012/2812, Kings College Playing fields.

The principle objections that they raise are:

1. the public will be excluded from a large area of land covenanted as public open space
2. the application is contrary to the Local Authority Green Chain Policy
3. there is no visual impact assessment
4. the ecological appraisal is out of date and the report's findings disputed
5. ancient trees are threatened by the new car park
6. the car park design is impractical
7. there will be increased flood risk due to fencing and kickboard design

8. there is no clearly identified need for the facility
9. the floodlight design is deficient
10. the noise impact from the existing AstroTurf already exceeds LBH guidance levels

For balance I have also met with Eastcote Hockey Club who are an important community asset. They have clearly tried to respond to previous concerns of their neighbours but this application has not diluted in any way the strength of local opposition.

As you would expect, there is considerable concern that this issue will just drag on. The idea has arisen that the council could voluntarily designate Pinn meadows as a Village Green and so protect the area. I imagine that this raises all sorts of issues but I would appreciate an official response to this idea which appears to have some precedents in other areas.

Ward Councillor

I have received copies of letters/emails sent to the Council from people who are objecting to the planning application. I would be grateful if you would pass this information onto the relevant Officer and I am asking that their comments are taken into consideration when the Officers are writing their report and the Members of the North Planning Committee are considering this application.

Ward Councillor

This is not I am sure, a planning consideration, however, if I am not mistaken, the land in question is under the council's ownership.

Given the position of the council on this issue - namely that we will not sign the lease which would enable this to proceed - people are asking how it is possible for the club to make this application for development on land they don't own which the council won't agree to irrespective of the outcome of the planning application. I can only assume that anyone can put in a planning application anywhere and if approved - proceeding or otherwise becomes a civil matter?

### **Internal Consultees**

#### **POLICY AND ENVIRONMENTAL PLANNING (PEP)**

##### **1. Introduction**

The proposal seeks permission for an additional all-weather playing pitch at Kings College Playing Fields. The site is located within an area that forms links within a Green Chain.

##### **2. London Plan (adopted July 2011)**

Policy 2.18 Green Infrastructure: the network of open spaces recognises the importance of the network of green infrastructure and the benefits it offers including, but not limited to: biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being. Development proposals should encourage the linkage of green infrastructure, including the Blue Ribbon Network, to the wider public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening (Policy 5.10).

London Plan Policy 7.17 on Metropolitan Open Land states that for planning decisions:

A. The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL. LDF preparation

B. Any alterations to the boundary of MOL should be undertaken by boroughs through the LDF

process, in consultation with the Mayor and adjoining authorities.

C. To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:

- a. it contributes to the physical structure of London by being clearly distinguishable from the built up area
- b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
- d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

London Plan defines 'Green Chains as areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian and cycle routes. Paragraph 7.56 states that green chains are important to London's open space network, recreation and biodiversity. They consist of footpaths and the open spaces that they link, which are accessible to the public. The open spaces and links within a Green Chain should be designated as MOL due to their London-wide importance.

### 3. Hillingdon Local Plan: Part 1- Strategic Policies

UDP Saved Policy OL11 has been replaced by Policy EM2 of the Hillingdon Local Plan: Part 1- Strategic Policies. The Local Plan Part 1 has been formally adopted by the Council in November 2012. The site falls within an area that forms links within a Green Chain therefore Policy EM2 of the Local Plan Part 1 is relevant:

Policy EM2: Green Belt, Metropolitan Open Land and Green Chains states:

'The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Notwithstanding this, Green chains will be reviewed for designation as Metropolitan Open Land in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD and in accordance with the London Plan policies. Minor adjustments to Green Belt and Metropolitan Open Land will be undertaken in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD.

Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the green chain'.

Background information being gathered in the production of the Hillingdon Local Plan: Part 2 - Site Allocations and Development Management Local Development Documents and Policies Map include a Metropolitan Open Land and Green Chains Assessment. This Assessment identifies Kings College Playing Fields as a site to be removed from the Areas forming links in Green Chains designation and proposes that it should be included in the Metropolitan Open Land (MOL) designation on the Policies Map. Whilst this is an evidence base document, it gives an indication of that this Green Chain is likely to be designated as MOL in the future.

Whilst the proposed all-weather pitch will not restrict public access along the majority of the Green Chain and seeks to encourage the provision and improvement of recreational facilities which may



encourage further use of this area, the proposal would introduce hardsurfaced areas, fencing and floodlighting removing distinctive landscaping features that would introduce a built-up appearance on the site. Whilst an Ecological Statement has been provided but this relates to the previous application. As such the applicant has failed to provide evidence of the impact of the proposal on ecological value. Therefore, the proposal would fail to conserve and enhance the visual amenity and nature conservation value of the landscape, form a visual and physical break within the urban (built-up) area and retain the openness of the Green Chain which is not considered to be consistent with the aims of Policy EM2 of the Hillingdon Local Plan Part 1 Strategic Policies and Policy 2.18 of the London Plan (2011).

#### 4. Secondary Hillingdon Policies

##### Parking

There are established Council Car Parks within 200m of the proposed facility. Officers are advised to seek the Council's Highways Engineer's comments on the traffic impact the likely intensification of the use of the site may cause.

##### Flood risk

The proposed all-weather pitch is located within the 1 in 100 year floodplain. Officers should consult with the Environment Agency.

#### 5. Conclusion

LDF Team objects to the proposal due to its failure to conserve and enhance the visual amenity and nature conservation value of the landscape, form a visual and physical break within the urban (built-up) area and retain the openness of the Green Chain which is not considered to be consistent with the aims of Policy EM2 of the Hillingdon Local Plan Part 1 - Strategic Policies and Policy 2.18 of the London Plan (2011).

#### SUSTAINABILITY OFFICER

I object to the proposed development. The supporting ecological information is out of date, and does not relate to the submitted scheme. In general, the all weather pitch itself will pose little problems as it is situated on an existing playing pitch which is regularly mown. This area would have limited value for wildlife.

The concern now relates to the additional car parking and footpaths being created near the existing club house. This car parking will result in the loss of a couple of mature trees and a line of scrub that runs along a drainage channel. This area is likely to be of a higher value to a range of species. It also helps provide a supporting wildlife corridor for that along the Yeading Brook.

No ecological information has been submitted regarding the value of this area. It has features, including the water channel, mature trees, and scrub that would be considered suitable for protected species. Natural England standing advice requires at least a broad assessment of the value of these areas, prior to determination. If further survey work is required, this should also be done (ideally before validation, but certainly before determination).

The applicant is required to update the ecological appraisal of the site, and include the new car parking area. It needs to provide a clear assessment of the value of this area, as well as any features to be removed or altered. Further surveys will need to be completed by suitably qualified experts at the appropriate times of the year if required (for example, bat surveys of the mature trees).

ADDITIONAL INFORMATION: The additional information does not constitute sufficient ecological information to allow the Council to adequately support an approval.

The proposed site plan submitted with the application shows two trees to be removed along with an extensive line of what is described as foliage. The arboricultural impact assessment refers to a number of other trees to be removed including two to be independently assessed by the Council. However the fact remains that the existing trees and foliage is likely to provide a wildlife corridor linking with the wider River Pinn Network.

The only information submitted regarding ecology comes from a 2010 assessment and relates to a previous scheme. This is not acceptable, particularly as the new proposals results in the loss of the wildlife corridor as outlined above. A full assessment of this corridor and the implications for its loss needs to be provided. The Council needs to know what species are supported by this corridor, and would expect an assessment of the impacts on bats that are likely to use it.

A much greater enhancement offering would also be required should it be deemed that the reasons for the development outweigh the harm caused.

#### FLOOD AND DRAINAGE OFFICER

The site lies within Flood Zone 3, and large proportion of this within the functional flood plain Flood Zone 3b. This is an area that has previously flooded in a number of flood events the most significant of which was 1977.

#### Comments on the Planning Application

There are a number of concerns as the Flood Risk Assessment provides insufficient information on which to assess the full implication of the proposal on and to flood risks from all sources and therefore demonstrate that the proposal will not increase flood risk to others.

The application also detrimentally affects the Celandine route, part of the Blue Ribbon Network.

#### Fluvial Flood Flood Risk

Local Plan Part 1 Strategic Policies (Adopted Nov 2012) - Policy EM6 Flood Risk Management. Applicants must demonstrate that Flood Risk can be suitably mitigated.

The aim of the sequential test is development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding

A preliminary sequential test undertaken as part of the FRA suggests that simply as the proposal is considered to be Water compatible development and therefore a suitable development at this location.

A sequential test undertaken by the LBH in 2011 states, the proposals being put forward by the Eastcote Hockey Club (EHC), are needed to help meet a growing demand for sports and recreational activities that are not always practical on grass playing pitches. The all weather pitch will allow EHC to meet all year round demands and with the use of floodlights will be able to provide an improved recreational offer beyond that of the current grass pitches. The choice of sites for the development is constrained by the location of the existing EHC facilities. The new pitches had to be linked to the existing facilities of the EHC. It is considered that there are limited alternative areas for the new all weather facility to be located. It has to be sited close to the existing facilities. There is an area of flood zone 2 to the south of the development but this already has an all weather pitch on it. Therefore there is no alternative on the site.

A site specific Flood Risk Assessment has been undertaken by Hannah Reed and Associates,

dated Oct 2012 Rev D, and have also provided an additional letter dated 5th Feb 2013 covering further flood risk issues.

The proposal for the artificial pitch includes the lowering of areas to provide additional flood plain storage. Full level for level calculations have been submitted which demonstrate that overall there is clearly no loss of flood plain storage and the levels proposed in relation to flood storage are therefore acceptable.

The proposed fencing around the pitch is not in the spirit of the functional floodplain i.e. not impeding flow across the floodplain. However there is only likely to be a very localised impedance on flood flows and storage, although the minimal gaps left between the kick boards provided are likely to block with debris, as the kick boards are proposed to be 200mm for events above the 1 in 20 year they will be overtopped. Therefore the site continuing to provide suitable flood storage for those events above the 1 in 20 year event.

Note: The type of mesh fencing proposed immediately above the kick boards and below the anti climb mesh has often been vandalised and replaced at a later date with further anti climb mesh. This will not be acceptable as it likely to further impede the flow of water and storage in the functional flood plain.

Note: A pitch is deemed as water compatible development, however it is clear the type of pitch used at this location will be clearly subject to frequent flooding. This clearly is major consideration to the practicality of the scheme and I have to draw your attention to this. Many artificial pitches are clearly affected by flooding and considerable restoration and cleaning works if not replacement works are required prior to use subsequent to flooding. This is also likely to have an associated increase in maintenance likely by the deposition of silt. This does not appear to have been explored fully within the flood risk assessment, although a plan for cleaning the pitch following a flood event is recommended by the FRA, this would be a useful document to understand the practicality of the proposal and the implications on costs of this location within the 1 in 5 year flood event outline and therefore the feasibility of this project as a whole.

However the extension to the car park raises very different and more substantial risks lying in the Flood Zone 3. A large proportion of the area of the proposed car park is in the 1 in 5 year flood event, and all in the 1 in 20 year, considered to be Flood zone 3b and functional floodplain. Any considered appropriate uses must be designed and constructed to remain operational and safe for users in times of flood and not impeding water flows.

The FRA suggests that the risk to the car park will be in the 1 in 20 year flood events and a level of 300mm across the whole car park. In some areas of the car park this rises to a depth of 700mm which is acknowledged in the FRA. A depth of 300mm is sufficient to float a car, particularly with a fast flowing river. The risk in this area is therefore substantial and an assessment should be made against DEFRA FD2320. The letter dated 5th Feb 2013 assesses this risk and confirms that the risks on the proposed site are a 'Hazard to all'.

The proposal put forward by the FRA for managing the risk to others created by the use of this area as a car park, is to use hedging to contain any cars to prevent them being washed away. Although I note that bollards have been considered but discounted due to the impact on trees. The proposal of a hedge may also attract debris being of a more substantial nature and cause blockages and therefore also impeding flow to an area of functional floodplain.

There is an existing ditch running through the site which the FRA, makes no reference to, although its existence is acknowledged in the subsequent letter dated 5th Feb 2013 in response to initial concerns raised. With an inlet and potential conveyance for water to flow, whether defined as a ditch or swale it is a passage through which water flows and therefore would be classed as an

ordinary watercourse As such should be retained to maintain space for water. The proposal drawings show culverting of that ditch but makes no assessment of the implication of this on the flood risk at the site. The letter dated 5th Feb 2013 refers to preliminary design of these crossings but it was not provided. Timber rafts are proposed to span the ditch, however it is presumed that these rafts will require foundations. In the proposed locations this falls within a no dig area to minimise the impact on the trees on site which therefore may make proposals unsuitable. There is also no information to demonstrate the raft will not become a hazard. If the rafts are not securely fixed in place in a flood event there is potential that a raft could be lifted during a flood event. An assessment of the proposed footpath and car access should be provided to demonstrate that it will not impact on flood flows and flood storage.

Note: Any proposals to culvert an ordinary watercourse requires the prior permission of Hillingdon council. The London Borough of Hillingdon seeks to avoid culverting, and its consent for such works will normally be withheld. A permission separate to that of planning would be required, under the Land Drainage Act 1991 as amended by the Floods and Water Management Act 2010.

Note: The landscaping plan appears to propose new tree planting in the line of the existing ditch which would not be acceptable This is noted in the letter and states that no further trees will be planted close to the ditch.

To manage the residual risks after the flood risk measures have been put in place an Flood plan is proposed. However there is no assessment of the ability to provide this. Currently at the beginning of the FRA it states that the River Pinn responds rapidly. An emergency plans effectiveness depends on the ability to receive a warning and have time to respond to undertake those elements required to make an area safe. It is clear from the FRA that in this location due to the flashy nature of the catchment that warning times are short.

The letter dated 5th Feb2013 begins to assess the ability to provide a suitable emergency plan for the site, and recommending the potential procedure for evacuation to manage the considerable residual risk to people and property that would remain. Further detail would have to be provided should this proposal be approved and a suitable condition applied.

The effectiveness of this emergency plan and taking action on receipt of the warning is dependant on the management of the proposed car parking, an open car park could mean those in the wider community outside the hockey club may be using the site, and therefore not be able to be contacted to remove their vehicle from the site. Further details of the way the car park will be managed including access should be provided. Although it is noted there will be placement of warnings in the car park about it is unclear if this is about the parking being for Hockey Club members only or indicating the dangers. Any signage should include reference to the dangers.

#### Drainage

There is current land drainage on site across the area proposed. This is not assessed by the FRA. The proposals to lower the ground levels at the location of the pitch combined with the sub-base and concrete edging proposed are likely to have an impact on the land drainage across the site.

Sport England requirements that the pitches are drained in order that they are not waterlogged appears to contradict the statement in the FRA that no formal drainage would be required, and therefore the proposals would meet requirements for Greenfield run off rate.

There are requirements on the design of any outfall from the Environment Agency which need to be met. It would appear that with the new outfalls which may need to be constructed to deal with changes in any drainage arrangement on site, it would appear to indicate that gravitational drainage of the site will be difficult, and therefore not clear that a sustainable system would work.

Therefore in order to full understand the implications of the proposal further detail of the substrata on the site and existing land drainage should be provided. Alongside demonstration that suitable sustainable drainage could be designed with the proposed levels on the site and river levels.

Note: Any replacement outfall should have non return flap valves.

Note: The effectiveness of any permeable artificial surfacing will decrease with time depending on the maintenance regime.

Note: Investigation and appropriate permissions are required from the Utilities regarding the two sewers crossing the proposed site. It should be demonstrated that suitable coverage will need to be left over these and that these do not affect drainage proposals.

#### Blue Ribbon Network

Local Plan Part 1 Strategic Policies ( Adopted Nov 2012) - Policy EM3 Blue Ribbon Network.

The Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats. We will do this by Improving access to and the quality of Hillingdons river and canal corridors.

The south eastern corner of the proposed car park and pitch run alongside part of Celandine walking route which follows the River Pinn. The All London Green Grid states the River Pinn corridor is very vulnerable as it is narrow at several points. The proposal will impact on the integrity of the Celandine route, One of the key routes which forms part of the blue ribbon network. The proposals hinder the council in achieving its policy to enhance the local character, visual amenity, ecology and sustainable access to rivers and canals.

#### RECOMMENDATIONS:

I recommend the application be refused because:

- It fails to assess fully the implication of the proposal on flooding and demonstrate that the application will not increase flood risk to others,

The applicant must demonstrate that flood risk can be suitably mitigated in accordance with the NPPF and Policy EM6 of the Local Plan.

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) Policy 5.12 Flood Risk Management of the London Plan (July 2011) and Planning Policy Statement 25. To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (July 2011).

- It hinders the council in achieving its policy to enhance the local character, visual amenity, and ecology to rivers and canals.

The applicant must demonstrate it positively enhances the strategic river and canal corridors, Policy EM3 Blue Ribbon Network of the Local Plan.

#### ENVIRONMENTAL PROTECTION UNIT (EPU)

I do not wish to object to this proposal. However, should planning permission be recommended I would wish to see conditions applied as set out below:

Lighting

I have reviewed the floodlighting assessment report undertaken by Highlights Floodlighting Ltd dated 3rd November 2010 titled 'Eastcote Hockey Club Project'.

Relevant available technical guidance has been considered in assessing the report.

#### Proposed lighting specification

The proposed luminaires are set out in the report as 28 Philips Optivision 2000w luminaires, 24 medium beam (MB/60) and 4 narrow beam (NB/60). There are proposed to be 2 switching mode, 500 and 300 lux. The 4 narrow beam luminaires are always in use for both modes, however the difference between 350 and 500 lux operation is a factor of 8 medium beam luminaires.

#### Control of light spill and glare

The Institution of Lighting Engineers recommends that the most effective way of achieving a uniform level of lighting over the whole playing area and preventing light spillage into surrounding areas is to use floodlights with an asymmetric beam. This allows the main beam to be produced at between 60 to 70 degrees whilst permitting the front glass to be kept horizontal. The table in 5.2 of the report confirms the luminaire positioning and orientation will not exceed 70 degree limit from the downward vertical.

Quantification of light spill can be indicated using a lighting iso-contour plot such as Highlights Floodlighting Ltd's submitted drawings No. EHC/1 to EHC/4 dated 3rd November 2010. This shows an indicative 1 Lux iso-contour for the proposed pitch location which indicates a suitable separation distance from the nearest residential receptors to the proposed.

To put this in context, the Light into Windows measured as EV (vertical illuminance in Lux) should not exceed a before curfew level appropriate to the Environmental Zone to which the location is appropriate to, as defined by the Institution of Lighting Engineers Guidance Notes for the Reduction of obtrusive light GN01 2005. In this instance the site is deemed to be E3: Medium district brightness areas, examples of which are small town centres or urban locations. The indicative 1 Lux iso-contour in my opinion shows a satisfactory levels of vertical illuminance will be achieved by the proposed floodlighting scheme. My only concern here is that the assessment did not include the existing pitch in terms of cumulative impact. In my opinion, this should have been undertaken to show there will be no impact on sensitive receptors in Meadow Close and Evelyn Avenue.

In order to ensure the continued implementation of the proposed lighting specification, I would recommend the following conditions be considered;

#### Condition 1- Floodlighting specification

The floodlights hereby approved shall be installed in accordance with the specification contained within the document entitled Eastcote Hockey Club project dated 3rd November 2010 undertaken by Highlights Floodlighting Ltd. The approved Philips OptiVision asymmetrical luminaires shall be positioned to minimise light spill and glare in accordance with the lighting iso-contours shown in drawing number EHC/1 dated 3rd November 2010.

Reason: to protect the amenities of nearby residential properties.

#### Condition 2 Floodlighting controls

Prior to first use a scheme setting out how the pitch lighting will be managed so as to ensure the living conditions of the nearby residents is not impaired. The scheme shall include details of regular maintenance and a regime to ensure that the agreed hours of use are observed. The scheme shall include such combination of physical and administrative measures as may be approved by the local planning authority. Thereafter, the scheme shall be implemented and maintained in full compliance

with the approved measures.

Reason: To protect the amenities of nearby residential properties.

#### Condition 3 Hours of use

The floodlights shall only be turned on and the pitch used between 0900 hours and 21:30 hours on Moidnays to Saturdays and between 0900 hours and 1800 hours on Sundays or on Bank Holidays only.

Reason: To protect the amenities of nearby residential properties from the activity generated by the floodlit pitch, including car borne traffic entering and leaving the site.

#### Noise

I have reviewed the noise survey report carried out by Walker Beak Mason dated 18th November 2010, ref: 3950.

The report provides result of the survey in terms of measurements and calculations at various receptors nearby and comparisons have been made with the Council's SPD on Noise. Cumulative impact assessment of the two pitches operating at the same time has also been carried out.

I can advise the assessment has been undertaken correctly and the predicted noise levels from the proposed pitch will not exceed the recommended noise levels in the Council's SPD. However, the report does highlight that impact noise i.e. LAMax do increase at position D by 4.2dB.

In order to mitigate the projected noise impacts and in order to ensure the proposed pitch implements all reasonable measures to reduce impact noise I would recommend the following condition be imposed:

#### Condition 4 Noise Control

The development shall not begin until a scheme which specifies the provisions to be made for the control of noise emanating from the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of the rebound board treatment around the pitch and such combination of physical and administrative and other measures as may be approved by the Local Planning Authority. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.

Reason: to protect the amenities of nearby residential properties

#### RIGHTS OF WAY OFFICER

Public Right of Way R135 runs from Elmbridge Drive through Kings College playing fields just north of the river Pinn to Kings College road.

This is an historical path and forms part of the Celandine Route walk which follows the river Pinn through the borough. It is very well used and has very strong local resident feeling towards it, I have received several inquiries from the local community with concerns regarding the application.

The submitted plans indicate that Public Right of Way R135 will remain uninterrupted by the development, with this in mind I would like to make the following comments:

With the application for development being sited within 1-2 metres of the Public Right of Way the future of the public footpath needs be taken into consideration as the path will be impacted upon . The nature of the development will lead to the footpath becoming enclosed between the river Pinn and the development, this will inevitably lead to erosion pressure and adverse conditions, this will in

turn lead to higher maintenance costs on the Council. Future erosion problems of the river Pinn banking could also lead to potential maintenance costs of the footpath. To compensate this a footpath constructed of Cotswold gravel could be laid along the entire length of the Public Right of Way, in addition this would be a future maintenance liability on the Council.

A Public Right of Way holds an amenity value as well as a legal status to pass and re-pass over it. The development will have a detrimental effect on the character of the footpath, the visual impact of the development will seriously impede the views over the ancient river side meadow (the images provided in the submitted plans do not show a view from the Public Right of Way).

The plan appears to show the proximity of the development 1-2 metres from the public footpath, the location of the development could lead to potential safety problems as the enclosed nature of the path between the river Pinn and the development will offer no natural escape route if an attack were to take place.

The submitted plans suggest providing an additional entrance point from the public right of way, this would require a written agreement with the Highways Department and would not enhance the enjoyment of the route for path users in the manner that surfacing a short section would only lead to erosion where the surface ends and would only act as an access point for the proposed development.

#### TREE AND LANDSCAPE OFFICER

The site is an area of open land located to the north of the River Pinn, and is bounded to the west by Kings College Road and to the north by the rear gardens of Park Avenue. The site is designated Metropolitan Open Land, the centre of which is open mown grassland with marked-out playing fields. It is also well used by local residents for informal recreation. The Celandine Walk, a long-distance footpath through the Borough, runs approximately east-west between the River Pinn and the existing football pitches. Along the western boundary there is a shelter belt of woody vegetation including hedges, which define the space and screen views of the Kings College Road.

One of the key landscape features of the site is a line of mature/ veteran pedunculate Oak trees which extend on a north-south axis from the south-west corner of the open space and strike an angle from the boundary fencing (which lies on north-north west axis). These trees are mature and form part of a number of similar aged trees of the same form in this old hedge line. They are not protected by Tree Preservation Order because they are situated on Council-owned land. They are managed and maintained by the Council's Green Spaces team. There is also ruderal vegetation, including Willow trees and scrub, along the northern edge of the river corridor.

The site lies within Ruislip Plateau Natural Landscape Area, as identified within London's Natural Signatures. It is also described in Hillingdon's Landscape Character Assessment, as Landscape Character Area (LCA) G1 Upper Pinn River Corridor. The introduction to the character assessment describes the area as a low lying flat floodplain landscape, confined and often channelled through settlement areas such as Ruislip and Ickenham, occasionally broadening out into large scale open grassland a sense of containment and tranquillity is experienced along the river course contrasted with open large scale grassland areas, allowing for longer views.

**PROPOSAL:** The proposal is an amended scheme (cf 2011/2661) to install an all-weather, and dressed multi-purpose sports playing pitch with associated floodlighting, fencing and car parking.

**LANDSCAPE CONSIDERATIONS:** Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate. Policy EM2 seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Policy EM4 seeks to



safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes.

A Tree Survey and Arboricultural Impact Assessment, by Patrick Stileman, has been submitted in accordance with BS5837:2012. The survey assesses the quality and value of 20 No. individual trees and 3 No. groups of trees which are on, or close, to the site. Of these, 3 No. trees have been categorised as 'A' grade trees (high quality trees for which there is an assumption that they should be retained). There are 13 No. 'B' grade trees / 1 No. 'B' grade group (trees of moderate quality which are worthy of retention and should be viewed as a constraint on development), 1 No. 'C' grade trees / 2 No. 'C' grade groups (low quality which may be worthy of retention but do not impose a significant constraint on development), and 4 No. 'U' grade trees which have a short life expectancy, are unsuitable for retention and whose removal can be justified.

Tree ref.4 (a 'B' grade Sycamore) and G3 (a group of young 'c' grade hawthorn, elder and sycamore) are recommended for removal as part of this proposal. The removal of these trees is required to enable the development, by providing space for the new field-side car park and access to it. In terms of tree / landscape preservation, the Sycamore is a suppressed tree within the group of Oaks and its removal may be acceptable, as would the young mixed vegetation in Group 3.

The location of the pitch has been moved further from the edge of T2, a Pedunculate Oak (B grade), by two metres in order to move the perimeter of the pitch to the edge of the tree canopy, rather than under it. At 5.3.2 of the Arboricultural Impact Assessment it is acknowledged that, even in this location, some very minor crown pruning of the low branch tips on the eastern side of the tree may be required to facilitate construction of the pitch's fence [and thereafter, prevent branches from overhanging the pitch].

The tree survey has categorised tree ref.5 (a pedunculate Oak) as a 'U' grade tree which has decay caused by *Inonotus dryadeus* (a decay pathogen) and recommends its removal. Notwithstanding this decay, this tree is a fine specimen and an integral part of the group of oaks which form such a significant feature in the landscape, whose collective amenity value enhances that of the individual specimens. The Council's tree specialists are aware of this defect and, in August 2012, commissioned a Picus Tomograph Test on the tree. On the evidence available, the Council propose to regularly inspect and monitor the condition of the tree, carrying out work to it, as and when necessary.

The Arboricultural Impact Plan indicates the root protection area required by the Oak (T5). However, in this case the proposed car park and access will clearly affect a greater area than the 20% of the root protection area permitted by BS5837:2012. According to this plan, closer to 50% of the RPA of T5 will be affected by the proposed 'no dig' surfacing. As part of the ongoing management of this tree, the Council proposes to reduce the risk to potential targets by discouraging parking, pedestrian traffic or construction close to the tree - in accordance with good tree hazard management. The removal of the oak, at this time, is not considered to be justified and may weaken the integrity of the group of oaks, leaving the remaining trees vulnerable to wind-throw.

Furthermore, the introduction of paving and cars may put pressure on the health of the tree, while the introduction of human activity beneath the tree will inevitably place pressure on the Council to remove the tree in order to reduce the risk to the public.

The new car park extension to the north-west corner of the hockey pitch has been amended, and designed to minimise the extent by which it overlaps the root protection areas (RPA) of the existing trees, ensuring that no more than 20% of the RPA is used for car parking. This specification complies with the recommendations in BS5837:2012 (7.4.2.3). However, it is noted that the new car

park is sub-standard to allow for parking and manoeuvring, as shown. The chevron parking and narrow access route is designed for parking in a one way systems. A greater land-take is required to provide the necessary width for right-angle parking with sufficient space to enter and leave the spaces.

The proposal is contrary to policy EM2, in as much that cage like structure of the perimeter fencing fails to conserve or enhance the visual amenity of the open land. Locally, it will impede views of, and public access near, the River Pinn and the Celandine Route. The visual impact of the fencing will be exacerbated by the height and security specification (density of the mesh) of the perimeter fencing, which lacks visual permeability.

In order to implement policy EM4, one of the objectives of the Council is managing development to resist the loss of open spaces, trees and woodlands. The monitoring of this policy includes improving public satisfaction with the quality, accessibility and number of open spaces in the borough. In this case there is evidently significant public opposition and criticism of the effects of the development on the loss of accessible open space and the detrimental effects on the landscape.

The Design and Access Statement (6.14 and 15) describes the fencing for the pitch as dark green, 4 metres high with a 50 x 50 mm mesh for the first metre with high-security non-climb fencing for the top 3 metres. The fencing height will be higher, at 4.5 metres, above the goal ends. The fencing is higher than initially proposed (3 metres).

Surfacing beneath the trees is to be installed using a non-dig method of construction, as recommended by the tree report. The proposed car park will consist of a permeable CellWeb Tree Root Protection system overlain with gravel, and the footpath will be constructed of CellWeb overlain with semi-permeable concrete block paving.

Section 6.48 of the Design and Access Statement confirms that the proposed car park will be screened from view by the planting of additional vegetation: a mix of native hedge species which will wrap around the car park at either end and between the car park and the pitch. This screen will only become effective over a number of years and be available in the summer months when the deciduous plants are in leaf.

The proximity of the pitch to the trees is likely to create a need to reduce additional branches in the future which oversail the pitch and drop leaf litter, a requirement that the Council might find unreasonable to resist.

According to the current proposals, the siting of the all-weather pitch will result in the constraining of the footpath, a Public Right of Way, between the pitch and the River Pinn. The enclosure of the pitch with its high fencing will result in a significant pinch point of the Celandine Walk which is currently open and unconstrained at this point.

Lighting columns and light spillage from the lamps will inevitably have a visual impact on the day and night-time landscape. The 8 No. columns (four on each side of the pitch) should be coloured so that they are as neutral / recessive in the landscape as possible. The Design & Access Statement (section 4) confirms that the artificial lighting will be directional and focused. If the application is approved, the design (appearance and colour) of the light fittings should be carefully considered.

**RECOMMENDATIONS:** This proposal is unacceptable because:

- The development fails to harmonise with area and would be detrimental to the character and appearance of the area. It will significantly reduce the perception of openness and accessibility within the site of Metropolitan Open Land,

· in spite of the supporting tree reports and the proposed new planting, the applicant has failed to demonstrate that the existing group of Oak trees will be unaffected by the development and has not made provision for their long-term protection.

#### URBAN DESIGN AND CONSERVATION OFFICER

The site does not fall within a designated area, nor are any Heritage Assets likely to be affected by this proposal and design matters do not appear to be the principal issues re this application. As such, the Conservation and Urban Design Team do not wish to forward any comments re this consultation. However, if you wish us to consider any particular aspects of the scheme, or feel that design comments are required, could you please let us know.

#### ACCESS OFFICER

Planning permission is sought for an all-weather multi-purpose sports pitch, with floodlighting, fencing and car parking at Kings College Playing Fields in Ruislip. The pitch would be accessed via a new footpath from the south east corner of the club house to the pitch entrance. A further short section of footpath is proposed providing for access between the proposed pitch and Kings College Road along the existing public footpath. The new footpaths would be constructed using a raised non-dig method of construction, and installing semi-permeable concrete block paving. The proposal also seeks to provide an additional 30 car parking spaces, bringing the total to 59 spaces of which three would be accessible for use by disabled people.

The following observations on the accessibility aspects of the proposal are offered:

1. Further details should be submitted to ensure that the proposed new pathway would be fully accessible to disabled people in accordance with BS 8300: 2009, as follows:

Where the joints between paving materials are filled but recessed below the surface, the difference in level between adjacent paving units should be no greater than 2 mm, with the joints no wider than 10 mm and the recess no deeper than 5 mm. Where the joints are unfilled, the difference in level between adjacent units should be no greater than 2 mm, with the joints no wider than 5 mm.

2. In line with policy AM15, the proposed car park should incorporate no less than 5 accessible car parking spaces, particularly as there is every likelihood that disabled people would wish to participate in sporting activities or attend as a spectator.

Conclusion:

Further details and a minor amendment would be required for this proposal to be acceptable from an accessibility perspective.

#### ESTATES AND VALUATION

I confirm that the club would need Council approval as landlord to the proposals and since the proposals involve some land that is not currently leased to them, their existing lease would have to be altered to include the additional land.

#### HIGHWAY ENGINEER

A Transport Statement (TS) has been submitted in support of the planning application. It suggests that the car parks have an estimated capacity for 120 car parking spaces on the basis of Astro 24 spaces, Clubhouse 29 spaces plus 42 spaces in the adjacent Council's car park, and Kings Caf©

25 spaces. Capacity of the car parks is estimated because the parking spaces are not marked. Car parking surveys were undertaken on Saturday 24th March and Sunday 25th March 2012, where Saturday represented the worst case scenario when the hockey club played five matches at 90 minute intervals from 10:30, and the football club played at least four matches simultaneously at 10:30 and a further two matches at 12:30. The parking survey showed that on Saturday the occupancy levels of the car parks were Astro 22 spaces, Clubhouse 64 spaces, and Kings Caf@ 25 spaces, resulting in a total of 111 cars parked. For the purpose of my review, I have considered the occupancy levels to me more representative of the available off-street parking capacity taking into account that the car parks capacity in this case is dependent upon how well drivers park their vehicles. The parking survey also showed existing high demand on on-street parking.

The site is located in a poor public transport location. TS suggests the hockey club's members that responded to the survey questionnaire showed that 69% of them travelled to home matches as a car driver, 12% were car passengers and 19% arrived by sustainable transport modes. These proportions can however change depending on the travel methods of a different set of respondents and can also vary by team. The applicant should therefore submit a sample test at 5% level of significance to demonstrate the results are acceptable. The survey questionnaire should also be submitted.

A typical of 20-30 people are considered to be involved in each hockey match consisting of 22 players (11 on each side) plus substitutes, umpires and coaching staff. There could be a few spectators as well. The current all-weather pitch has a match every 90 minutes on a Saturday, with up to five matches being played per day. Each match normally consists of two 35 minutes halves plus a half time break. It is anticipated that the busiest day for the new pitch would have a similar number of matches. The start times for the new pitch should be offset from those on the existing pitch to minimise the number of trips arriving at the same time. This should be covered through a suitable planning condition.

Subject to the aforementioned questionnaire survey being acceptable, the home team is estimated to have a car parking demand of 10 spaces. Taking account of greater car sharing for the away team, it is anticipated that it would have a lower parking demand, which the TS estimates to be 4-5 spaces. The proposal includes additional car parking capacity of 27 spaces and provision of 10 cycle parking spaces, which should be conditioned. The proposed car parking spaces are 3.1m wide x 4.8m long with 5.5 turning space, which is acceptable. Even if considering the parking demand for the away team to be similar to the home team, resulting in a total of 20 spaces, there will still be 7 additional spaces available to accommodate further demand should there be a need for it.

Subject to receiving a satisfactory sample test and applying conditions to cover matters discussed above, no objection is raised on the highways aspect of this application.

Officer note: The requested information had not been submitted at the time of writing this report and an objection to the scheme has therefore been raised on highway grounds.

## **7. MAIN PLANNING ISSUES**

### **7.01 The principle of the development**

#### THE PRINCIPLE OF THE USE

The provision of sports facilities and the protection of recreational open space in urban areas are key Government objectives, as set out in Sport England's Planning Policies for Sport and and the NPPF. The site is currently mainly used for outdoor sports facilities, the primary purpose of which is for pitch sports.

London Plan Policy 3.16 requires Local Plan policies to assess the need for social

infrastructure and community facilities in their area. Given there are issues surrounding the status of the open land and the safeguarding of existing sporting facilities on the site, the proposal should also be considered in the context of Saved UDP Policies R4 and R5 of the Hillingdon Local Plan: Part 2. Policy R4, seeks to resist the loss of recreational open space, particularly if there is (or would result in) a local deficiency. Policy R5 seeks to protect outdoor and indoor leisure facilities, unless alternative adequate and accessible facilities are available. The over-riding caveat of Saved Policy R16, however, is that such facilities must be accessible to all without increasing the need to use private motor cars.

Policy R4 identifies four issues which need to be addressed:

- a). the local deficiency of accessible open space;
- b). the suitability of the site for other types of open land uses;
- c). the ecological structure and other functions of the open space and the extent to which these are compatible with the proposed development;
- d). whether the users of the facility can be satisfactorily accommodated elsewhere in the vicinity.

In terms of addressing criteria a), the site forms part of a large area of recreational open space. Policy EM4 (Open Space and Informal Recreation) of the Hillingdon Local Plan Part 1 Strategic Policies seeks to safeguard and extend the network of open spaces, informal recreational and environmental opportunities. There will be a presumption against any net loss of open space in the Borough. Open spaces come in a variety of categories, not just those that are publicly owned or publicly accessible. The Unitary Development Plan defines open space as any open land which is used by the public or local community for outdoor recreation, whether publicly or privately owned. It includes areas such the Colne Valley Park, Ruislip Woods, local parks, playing fields, children's play areas and informal grassed areas.

According to the London Borough of Hillingdon Open Space Strategy 2011 - 2026 evidence base document, only 48% of open spaces recorded have free or unrestricted public access. A further 35% have some form of limited or restricted access, for example membership or payment of an admission fee is required or prior arrangement is required to allow access. Nearly 18% of open spaces within the Borough have no public access. 70% of all open space with unrestricted access is natural and semi-natural in character. Key natural and semi-natural spaces include Ruislip Woods, Frays Farm Meadow, Minet Country Park and Lake Farm Country Park.

The Open Space Strategy identifies Eastcote and East Ruislip Ward as having insufficient quantity of unrestricted open space to meet the quantity standard. A further 33 hectares of unrestricted open space is required by 2026, to meet the standard and the expected population growth. However, it is noted that the Open Space Strategy defines Kings College Playing Fields as outdoor sports facilities (i.e. open spaces which provide opportunities for formal sports), rather than unrestricted public open space. Whilst the site is considered to be of local significance in meeting an identified community need for the area, the playing fields can be considered have some form of limited or restricted access, as for instance, dog walking is not allowed on the playing pitches and clearly, sporting activities would take precedence over other forms of recreational use.

Whilst it is acknowledged that the proposal would result in further of limitation and restriction of this part of the playing fields, the proposal is considered to be justified in terms of criteria a), on the basis that Eastcote and East Ruislip Ward, within which the application site falls, is deficient in unrestricted public open space, it is not deficient in recreational open space and the proposed pitch would take up only a small proportion of

the existing playing fields.

For criteria b), the proposed all weather playing pitch is an open recreational use, which would provide new opportunities for informal recreation. In terms of the acceptability of the proposed all weather pitch, the current authorised use of the site is Class D2 (Assembly and Leisure) of the Use Classes Order 2005 (as amended). The proposed all weather pitch falls under the same use class. As such, the proposed development would not result in a change of use of the land, although the proposal is likely to result in an intensification of use and raise various environmental issues, (which are addressed elsewhere in this report). Since there would be no change of use of the land, it is considered that criteria (b) would be satisfied.

For criteria c), it is not considered that ecological issues have been satisfactorily addressed. This issue has been dealt with elsewhere in this report.

For criteria d), in terms of the satisfactory relocation of the existing activities elsewhere, the site forms part of, or constitutes a playing field, in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more. The new hockey pitch will result in the loss of a standard football pitch. Sport England has therefore considered the application in the light of its playing fields policy. Sport England's assessment of planning applications for development on playing fields is set out in its planning policy statement, 'A Sporting Future for the Playing Fields of England'. This states that it will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of all, or any part of a playing field, unless at least one of five specific exceptions applies. The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area.

Sport England has stated that it is keen to ensure that the interests of both hockey and football are represented as part of the proposed development. In this respect, Sport England sought a planning condition be imposed on the previous application seeking that a community use agreement be submitted for the site. In addition, and in order to address the loss of grass pitches available to football as a result of the development, the applicant had previously agreed to enter into a S106 agreement, committing to refurbish, and subsequently maintain, the full size pitch within the existing running track and the running track on the adjacent site. The applicant also offered to lay out of five grass pitches on the site (3 mini & 2 youth/full) and the grant access by Eastcote Hockey Club to Ruislip Rangers JFC. These were all important factors in considering the previously application.

Sport England notes that the current application seems to remove these previous commitments, which is of concern to that organisation. Sport England therefore seeks some clarity from the applicant as to whether they will continue to commit to laying out of the five grass pitches and granting access to Ruislip Rangers JFC. It has also sought clarity on whether the athletics track pitch will be refurbished and thereafter maintained. Sport England is unable to confirm that the proposed development still meets exception E5 of its playing field policy.

The applicant has responded that the Hockey Club is prepared to agree to some of the commitments but not to others. The Club is not prepared to agree to the ongoing maintenance of the pitch within the athletics track. Sport England has been reconsulted, but has not withdrawn its objection. As such, it is not considered that criteria d) has been satisfactorily addressed.

## GREEN CHAIN DESIGNATION

The site is designated part of a Green Chain in the Saved UDP, September 2007.

Policy 2.18 of the London Plan July 2011 states that green infrastructure recognises the importance of network of open and green space and the benefits they offer including, but not limited to: biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.

London Plan Policy 7.118 seeks to protect local open space and address local deficiency. Policy 5.10 of the London Plan states that proposals should encourage the linkage of green infrastructure, including the Blue Ribbon Network, to the wider public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening.

The London Plan defines Green Chains as areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian and cycle routes. Paragraph 7.56 states that green chains are important to London's open space network, recreation and biodiversity. The open spaces and links within a Green Chain should be designated as MOL due to their London-wide importance.

London Plan Policy 7.17 on Metropolitan Open Land states that for planning decisions:

A. The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of Metropolitan Open Land.

B. Any alterations to the boundary of MOL should be undertaken by boroughs through the LDF process, in consultation with the Mayor and adjoining authorities.

C. To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:

- a. it contributes to the physical structure of London by being clearly distinguishable from the built up area
- b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
- d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

It should be noted that Hillingdon Local Plan: Part 1- Strategic Policies UDP Saved Policy OL11, under which the previously withdrawn applications were assessed has now been replaced by Policy EM2 of the Hillingdon Local Plan: Part 1- Strategic Policies. The Local Plan Part 1 has been formally adopted by the Council in November 2012. Since the site falls within an area that forms links within a Green Chain therefore Policy EM2 of the Local Plan Part 1 is relevant:

Policy EM2: Green Belt, Metropolitan Open Land and Green Chains states:

The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Notwithstanding this, Green

chains will be reviewed for designation as Metropolitan Open Land in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD and in accordance with the London Plan policies. Minor adjustments to Green Belt and Metropolitan Open Land will be undertaken in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD.

Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the green chain.

In terms of future designations of Pinn Meadows, the Council's Policy and Environmental Planning Team advise that background information being gathered in the production of the Hillingdon Local Plan: Part 2- Site Allocations and Development Management Local Development Documents and Policies Map include a Metropolitan Open Land and Green Chains Assessment. This Assessment identifies Kings College Playing Fields as a site to be removed from the 'Areas forming links in Green Chains' designation and proposes that it should be included in the Metropolitan Open Land (MOL) designation on the Policies Map. Whilst this is only an evidence base document, it does give an indication of that this Green Chain is likely to be designated as MOL in the future.

It is acknowledged that the proposed all-weather pitch will not restrict public access along the majority of the Green Chain and will provide recreational facilities, which may encourage further use of this area for sporting activities. Whilst there is no objection to the principle of a more intensive use of the site for sporting activities, the proposal raises a number of environmental concerns. The proposal would introduce hard surfaced areas, fencing, floodlighting and car parking and remove distinctive landscaping features that would result in a built-up appearance on the site, which is designated as Green Chain land.

As detailed elsewhere in this report, it is considered that the proposal would fail to contribute to providing a visual and physical break in the built-up area, conserve and enhance the visual amenity and nature conservation value of the landscape, or retain the openness of the green chain. In addition, the applicant has failed to provide evidence of the impact of the proposal on ecological value of the area. The scheme conflicts in part, with the aims of Saved policies R4 and R5. and it is not considered that any adverse impact on the open space has been outweighed by the benefits associated with the new facilities. The proposal is therefore contrary to the aims of Policy EM2 of the Hillingdon Local Plan Part 1 Strategic Policies and Policy 2.18 of the London Plan (2011). As such, the principle of the development in this location cannot be supported.

#### **7.02 Density of the proposed development**

No residential use is proposed as part of this development. Density is not therefore a relevant consideration.

#### **7.03 Impact on archaeology/CAs/LBs or Areas of Special Character**

Not applicable to this application. The application site is not located within or in proximity to any Conservations Areas, Areas of Special Local Character or Listed Buildings. The proposal would not impact on archaeology.



#### **7.04 Airport safeguarding**

Not applicable to this application. The proposal seeks construction of an all weather playing pitch with floodlighting. It would not therefore have any implications with regard to airport safeguarding.

#### **7.05 Impact on the green belt**

Not applicable to this application. The application site is not located in proximity to any land designated as Green Belt.

#### **7.07 Impact on the character & appearance of the area**

The site is designated part of a Green Chain in the Saved UDP, September 2007. The site is also adjacent to the River Pinn, which forms part of the Celandine Route.

Policy EM2 of the Hillingdon Local Plan: Part 1- Strategic Policies states that any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the green chain.

Policy EM3 (Blue Ribbon Network) states that the Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through the Biodiversity Action Plan.

Policies BE13 and BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to ensure that new development makes a positive contribution to the character and amenity of the area in which it is proposed. Policy BE13 states that, in terms of the built environment, the design of new buildings should complement or improve the character and appearance of the surrounding area and should incorporate design elements which stimulate and sustain visual interest. Policy BE38 of the UDP requires new development proposals to incorporate appropriate landscaping proposals.

Policy 2.18 of the London Plan July 2011 states that green infrastructure recognises the importance of network of open and green space and the benefits they offer including, but not limited to: biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.

One of the main concerns raised by local residents and local amenity groups are of the view that the development proposed is far from suitable in this location, preferring to maintain the status quo and retain the open playing fields. Local residents have expressed specific concerns that the introduction of a steel weld mesh enclosure of between 3m and 4.5m in height along with 15m high floodlighting does not maintain the visual and physical break in the built up area. Grass football pitches with no enclosures they argue, would offer amenity to the whole community as opposed to a small number of individuals.

Clearly, the all weather sports pitch, with its associated fencing and flood lighting, together with the proposed car park will have an urbanising effect on the existing playing fields. In this regard, it is considered the the fundamental open character of the area would be affected by the proposal. The proposed car park would be located to the east of the existing line of vegetation and tree belt, introducing parked cars and hard surfacing into what is fundamentally open meadow land.

In terms of the pitch itself, it is acknowledged that the fencing is necessary to protect the pitch from damage and vandalism and to protect passers by from wayward balls. However, the fencing would be relatively high. In addition, the fencing material specified is plastic-coated welded mesh panels, factory-finished in dark green. This specification (fence type and colour) can be visually impermeable in the landscape, depending on the precise grade of mesh, particularly when viewed from oblique angles. In this case, the weld mesh fence above 1 metre at 12.5mm x 50mm is considered to be particularly dense. In addition, there will be solid fencing at low level (250mm high) rebound / kick boards around the base of the fencing. It is considered that the cage like structure of the perimeter fencing would fail to conserve or enhance the visual amenity of the open land. Locally, it will impede views of, and public access near the River Pinn and the Celandine Route. The visual impact of the fencing would be exacerbated by the height and security specification. In addition, 8 x 15 metre high flood lights are proposed, four on each side of the pitch. Whilst the submitted documentation confirms that the artificial lighting will be directional and focused, the lighting columns and light spillage from the lamps will inevitably have some impact on the day and night-time landscape.

It should be noted that the proposal would have high visibility from the public domain, as a Public Right of Way R135 would run within 1.5 metres of the proposed pitch. This is an historical path and forms part of the Celandine Route walk, which follows the River Pinn through the Borough. The Celandine Route, part of the Blue Ribbon Network, runs the whole length of the Pinn, giving members of the public access to walks in the countryside. It links to the Hillingdon Trail and the heritage sites of Manor Farm.

The Hillingdon Landscape Character Assessment describes this section of the River Pinn corridor as a tranquil and intimate character, despite the close proximity to dense urban development and seeks to restrict incremental development along the river corridor, particularly vertical development, which will impact on the low lying, open character. It is acknowledged that the proposed all weather pitch would be located along a relatively short stretch of the twelve mile Celandine Route from Pinner to Cowley. However, it is considered that the proposed car park and enclosed pitch will have a detrimental effect on the character of this part of the Celandine Route, as the visual impact of the development will seriously impede the views over the ancient river-side meadow. It is considered important that the attractiveness of this route is maintained, to ensure that it continues to be well utilised and valued by the public in the long term.

Although the submitted plans indicate that Public Right of Way will remain uninterrupted by the development, the Rights of Way Officer notes that since the pitch will still be sited within 1-2 metres of the public right of way, the footpath would be enclosed between the River Pinn and the all weather pitch, which would inevitably lead to erosion pressure and adverse conditions. This will in turn lead to higher maintenance costs on the Council. Future erosion problems of the River Pinn banking could also lead to potential maintenance costs of the footpath.

It can be inferred from the above that not all of the public currently use the defined public footpath exclusively, but rather move across the fields in any direction. Clearly, the construction of the all weather sports pitch would limit the options available users of the route at this location, forcing the public to in effect adhere to the definitive route of the public right of way. Indeed, the All London Green Grid states the River Pinn corridor is very vulnerable, as it is narrow at several points. It is considered that the proposal will impact on the integrity of the Celandine route, and would fail to enhance the local character, visual amenity, ecology and sustainable access to the river walk.

It is therefore considered that the proposal is contrary to the aims of Policies EM2 and EM3 of the Hillingdon Local Plan: Part 1- Strategic Policies, Policies BE13 and BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy 2.18 of the London Plan 2011, as the scheme would fail to conserve and enhance the visual amenity of the Green Chain, contribute to the positive enhancement of the river corridor, or improve the character and appearance of the surrounding area.

#### **7.08 Impact on neighbours**

Saved Policies OE1 and OE3 seek to protect the environment from the adverse effects of pollutants and to ensure sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable. To the north of the playing field is Park Avenue with 80 Park Avenue being the closest property, which is some 170m away. The closest property to the proposed pitch to the south is 10 Meadow Close.

There are no limitations to the hours of use of the current sporting facilities. However, the effects of floodlighting and noise associated with a more intensive use of the site on residential amenity are matters for consideration. These issue of noise has been covered in detail in other sections of this report.

#### **FLOOD LIGHTING**

There is no specific design guidance on lighting. The relevant available technical guidance has been considered in the context of the location of the proposed pitch in relation to the nearest residential receptors.

The Institution of Lighting Engineers recommends that the most effective way of achieving a uniform level of lighting over the whole playing area and preventing light spillage into surrounding areas is to use floodlights with an asymmetric beam. This allows the main beam to be produced at between 60 to 70 degrees, whilst permitting the front glass to be kept horizontal. The floodlighting report confirms the luminaire positioning and orientation to not exceed the recommended 70 degree limit from the downward vertical. In addition, the proposed Philips OptiVision Luminaires are to be of an asymmetric beam design.

Quantification of light spill is shown on the lighting iso-contour plot submitted with the application. This shows an indicative 1 Lux iso-contour for the proposed pitch location, which indicates a suitable separation distance from the nearest residential receptors to the proposed floodlights.

The floodlighting report indicates that the scheme has been designed to minimise glare, reflected light and sky glow within the locality. Quantification of light spill has been indicated on the submitted lighting iso-contour plot which shows the 1 Lux iso-contour for the proposed pitch location. This indicates a suitable separation distance from the nearest residential receptors for the proposed use.

The Light into Windows measured as EV (vertical illuminance in Lux) should not exceed a before curfew level appropriate to the Environmental Zone to which the location is appropriate to, as defined by the Institution of Lighting Engineers Guidance Notes for the Reduction of obtrusive light GN01 2005. In this instance the site is deemed to be E3: Medium district brightness areas. To put this into context, 2.5 lux is a light intensity that equates with the illumination of night-time in a rural location (NCSA information 1997). The Environmental Protection Unit considers that the indicative 1 Lux iso-contour shows that satisfactory levels of vertical illuminance will be achieved by the proposed floodlighting

scheme. However, the assessment did not include the existing pitch in terms of cumulative impact. This should have been undertaken to show there will be no impact on sensitive receptors in Meadow Close and Evelyn Avenue.

The Environmental Protection Unit raises no objections, subject to conditions to ensure the continued implementation of the proposed lighting specification. These conditions would require the floodlights to be installed and maintained in accordance with the submitted specification, the approved Philips OptiVision asymmetrical luminaires would need to be positioned to minimise light spill and glare and in accordance with the submitted lighting iso-contours; control of hours of use (to that applying to the existing pitch); installation of that suitable lighting controls, such that the lighting is automatically switched off at the approved curfew time. Had the development been acceptable in other respects, subject to the recommended conditions, it is considered that development would not adversely affect the amenities of nearby residential properties from light spill generated by the floodlit pitch, in accordance with Saved Policy OE1 of the Hillingdon Local Plan Part 2 - Saved UDP Policies (2012).

It should be noted that this assessment relates to residential amenity only. Light spill onto the River Pinn corridor and the impact on ecology are dealt with elsewhere in this report and remain a cause for concern.

In addition, it should also be noted that there are ongoing enforcement investigations concerning the hours of use of the existing astro turf pitch.

#### **7.09 Living conditions for future occupiers**

Not applicable to this application, as the proposal does not include residential development. Living conditions for future residential occupiers is therefore not relevant to consideration of this proposal.

#### **7.10 Traffic impact, car/cycle parking, pedestrian safety**

The site is located on the eastern side of Kings College Road, which is an unclassified road linking the surrounding residential area and sports facilities with the main road network. PTAL rating for the site is 1a, demonstrating that there is low level of accessibility to public transport.

Extremely high levels of objections have been received in response to the Council's public consultation with photographic evidence submitted in support of the objections showing existing parking and traffic issues on Kings College Road.

The single existing synthetic grass multi-sports pitch is mainly used by the Eastcote Hockey Club, but is also available for other sports bookings from local youth and educational organisations. Adjacent to the site, there are football pitches/playing fields, which are also well used. The Club House building has badminton facilities and is also used for socialising and functions. On the Western side of Kings College Road opposite to the site, there are Ruislip Cricket Club, athletics track, playing fields, and Kings College Pavilion. Kings cafe serves food and drinks, and socialising activities also take place at this location.

All these uses have their own parking demands, which exceed the available spaces and result in significant overspill parking demand on the highway. During peak demand, heavy parking takes place on both sides of this section of Kings College Road and also extends on to other nearby roads.

The applicant has submitted a Transport Statement in support of the proposals. The

Transport Statement (TS) suggests that the available car parks have an estimated capacity for 120 car parking spaces, on the basis of Astro - 24 spaces, Clubhouse - 29 spaces, plus 42 spaces in the adjacent Council's car park, and 25 spaces at the Kings Cafe. The car parks capacity was estimated, because the parking spaces are not marked. Car parking surveys were undertaken on Saturday 24th March and Sunday 25th March 2012, where Saturday represented the worst case scenario, when the hockey club played five matches and the football club played at least four matches simultaneously. The parking survey showed that on Saturday the occupancy of the car parks totalled 111 cars. The Highway Engineer considers that this is a more representative indication of the available off-street parking capacity, given that the car park capacity would depend upon how well drivers park their vehicles. The parking survey also showed existing high demand on on-street parking.

The site is located in an area of poor public transport accessibility. The TS suggests the hockey club's members that responded to the survey questionnaire showed that 69% of them travelled to home matches as a car driver, 12% were car passengers and 19% arrived by sustainable transport modes. The Highway Engineer however questions these figures, given that the travel modes could vary with different sets of respondents.

In terms of parking requirements, the proposed second multi purpose sports pitch will effectively increase the demand, where the parking demand already significantly exceeds the available capacity. In order to address these concerns, the current proposals now include any additional parking provision for up to 30 cars, to cater for existing and future demands.

Typically, 20-30 people are considered to be involved in each hockey match, consisting of 22 players (11 on each side) plus substitutes, umpires and coaching staff. There could be a few spectators as well. The current all-weather pitch has a match every 90 minutes on a Saturday, with up to five matches being played per day. Each match normally consists of two 35 minutes halves plus a half time break. It is anticipated that the busiest day for the new pitch would have a similar number of matches. In order to reduce peak congestion, the Highway Engineer suggests that the start times for the new pitch should be offset from those on the existing pitch, to minimise the number of trips arriving at the same time.

The home team is estimated to have a car parking demand of 10 spaces, although this figure has been queried by the Highway Engineer and maybe higher. Taking account of greater car sharing for the away team, it is anticipated that it would have a lower parking demand, which the TS estimates to be 4-5 spaces. The proposal includes additional car parking capacity of 27 additional spaces (discounting the 3 spaces in the existing car park extension for which a separate planning approval maybe required)and provision of 10 cycle parking spaces, which could be conditioned.

In terms of access and manouverability, the proposed car parking spaces are 3.1m wide x 4.8m long with 5.5 turning space, which is considered acceptable. Even considering the parking demand for the away team to be similar to the home team, resulting in a total requirement of 20 spaces, there will still be 7 additional spaces available to accommodate further demand, should there be a need for it.

In addition, a travel Plan has been submitted in support of the application. The objectives of this Travel Plan are:

- To minimise the number of single occupancy car journeys to / from the site;
- To encourage EHC members to travel by non-car modes;
- To provide a choice of travel modes; and

To highlight the environmental and health related benefits of non-car travel

The measures for club members includes the provision of a Travel Plan Coordinator will provision of relevant travel information. The club will implement a formal car sharing scheme to reduce the number of single occupancy trips to the hockey club on match days and will also provide improved cycle parking facilities at the clubhouse, although it is recognised that cycling may not be a practical mode of travel for many players. With regard to measures for opposition teams, the TP recognises that it is unlikely that the club would be able to have a significant influence on the travel behaviour of its opponents. Opposition teams will be encouraged to car share or use a mini-bus when travelling to the club. The Travel Plan also includes targets, management and monitoring.

It is considered that the Travel Plan is unacceptable in its present form and would require updating. Had the development been acceptable in other respects, an updated Travel Plan could be secured by condition.

Subject to receiving a satisfactory sample test and applying the suggested conditions to cover matters discussed above, the Highway Engineer raises no objection on the highways aspect of this application. However, at the time of writing this report, the additional sample tests and survey information, required in order to demonstrate that parking demand can be adequately addressed, had not been submitted. As such, an objection is raised to the scheme on highway grounds as the proposal is considered to be in contrary to Policies AM7, AM14, and R16 the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

#### **7.11 Urban design, access and security**

##### URBAN DESIGN

Design matters are not the principal issues regarding this application. The Urban Design and Conservation Officer has therefore made no comments to the proposals.

##### SECURITY

Given the proximity of the development 1-2 metres from the public footpath, potential safety concerns have also been raised by local residents and amenity groups, as the location of the development would enclose the path between the River Pinn and the sports pitch and will offer no natural escape route if an attack were to take place. However, this view is not shared by the Metropolitan Police Crime Prevention Adviser.

The Metropolitan Police Crime Prevention Officer raises no objections to this proposal.

#### **7.12 Disabled access**

The Access Officer raises no objections to this proposal, subject to a condition attached to any grant of planning permission, requiring the pedestrian pathway that would link the existing clubhouse with the proposed new pitch and Kings College Road pavement, to relevant design standards. It is considered that had the scheme been acceptable in other respects, the proposed development would be in accord with the aims of Policies 3.14 and 7.2 of the London Plan (July 2011), the Hillingdon Design and Access Statement (HDAS) Accessible Hillingdon.

#### **7.13 Provision of affordable & special needs housing**

Considerations relating to affordable and special needs housing are therefore not relevant to this proposal.

#### **7.14 Trees, Landscaping and Ecology**

## TREES AND LANDSCAPING

Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate. Saved policy OL26 seeks the protection and enhancement of trees, woodland and landscape features. Policy EM2 seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Policy EM4 seeks to safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes.

The Tree and Landscape Officer notes that one of the key characteristics of the site is a line of mature Oak trees which are parallel to the western edge of the proposed all weather pitch. These trees are not protected by a Tree Preservation Order, as they are managed and maintained by the Council. There is also vegetation, including Willow trees and scrub, along the edge of the River Pinn corridor. All of the boundary vegetation which surrounds the playing fields to the east of Kings College Road provides a sense of containment and shelter, in contrast to the otherwise open flat area of amenity grassland, which is intensively managed for recreation. The surrounding vegetation is also considered to have landscape value in terms of its visual quality, local nature conservation value and historic associations.

It is noted that the location of the pitch has been moved further from the edge of a 'B' grade Pedunculate Oak (T2), by two metres (compared to the previous application), in order to move the perimeter of the pitch to the edge of the tree canopy, rather than under it. However, even in this location, some minor crown pruning of the low branch tips on the eastern side of the tree may be required, to facilitate construction of the pitch's fence and thereafter, prevent branches from overhanging the pitch. In addition, the proximity of the pitch to the trees is likely to create a need to reduce additional branches in the future which oversail the pitch and drop leaf litter, a requirement that the Council might find difficult to resist.

A grade 'B' (Sycamore) and G3 a group of young 'C' grade hawthorn, elder and sycamore are recommended for removal as part of this proposal, to enable the development, by providing space for the new field-side car park and access to it. The Landscape Officer notes that in terms of tree/ landscape preservation, the Sycamore is a suppressed tree within the group of Oaks and its removal may be acceptable, as would the young mixed vegetation in Group 3.

The tree survey also recommends the removal of a pedunculate Oak (Ref:T5) which is assessed as a 'U' grade tree, because of decay caused by *Inonotus dryadeus* (a decay pathogen). Notwithstanding this decay, it is considered that this tree is a fine specimen and an integral part of the group of oaks, which form a significant feature in the landscape, whose collective amenity value enhances that of the individual specimens. The Tree and Landscape Officer advises that the Council's tree specialists are aware of this defect and, in August 2012, commissioned a Picus Tomograph Test on the tree. The Council propose to regularly inspect and monitor the condition of the tree, carrying out work to it, as and when necessary. In addition, the Council proposes to reduce the risk to potential targets, by discouraging parking, pedestrian traffic or construction close to this tree, in accordance with good tree hazard management. The removal of the Oak, at this time, is not considered to be justified and may weaken the integrity of the group of oaks, leaving the remaining trees vulnerable to wind-throw. The removal of Oak T5 is therefore

not supported.

In terms of root protection, the new car park extension to the north-west corner of the hockey pitch has been amended, and designed to minimise the extent by which it overlaps the root protection areas (RPA) of the existing trees, ensuring that no more than 20% of the RPA is used for car parking. However, the proposed car park and access will affect a greater area than the 20% of the root protection area permitted by BS5837:2012 for Oak T5. It is more likely that up to 50% of the root protection area of this tree will be affected by the proposed 'no dig' surfacing. Furthermore, the introduction of paving and cars may put pressure on the health of the tree, while the introduction of human activity beneath the tree will inevitably place pressure on the Council to remove the tree in order to reduce the risk to the public.

The proposed car park will be screened from view by the planting of additional vegetation: a mix of native hedge species, which will wrap around the car park at either end and between the car park and the pitch. However, the Tree and Landscape Officer notes that this screen will only become effective over a number of years and be available in the summer months when the deciduous plants are in leaf.

In light of the above mentioned issues, the Council's Tree and Landscape Officer considers that the scheme is unacceptable as the applicant has failed to demonstrate that the existing group of Oak trees, deemed worthy of retention will be unaffected by the development and has not made provision for their long-term protection. In addition the development would fail to harmonise with area and would be detrimental to the character and appearance of this part of the Green Chain.

In order to implement Policy EM4, one of the objectives of the Council is managing development to resist the loss of open spaces, trees and woodlands. The monitoring of this policy includes improving public satisfaction with the quality, accessibility and number of open spaces in the borough. In this case there is clearly significant public opposition and criticism of the effects of the development on the loss of accessible open space and the detrimental effects on the landscape.

In light of the above mentioned considerations, it is considered that the proposal is contrary to Policy EM4 of the Hillingdon's Local Plan: Part 1 "Strategic Policies" (adopted November 2012) and Saved policy BE38 of the Hillingdon's Local Plan: Part 2 (adopted November 2012).

## ECOLOGY

Hillingdon's Local Plan: Part 1 "Strategic Policies" (adopted November 2012) EM2 (Green Belt, Metropolitan Open Land and Green Chains), EM3 (Blue Ribbon Network), EM7 (Biodiversity and Geological Conservation) and EM8 (Land, Water, Air and Noise) deal with ecological issues.

Saved Policy EC2 of the Local Plan Part 2 seeks the promotion of nature conservation interests. Saved Policy EC3 requires proposals for development in the vicinity of sites of nature conservation importance to have regard to the potential effects on such sites on changes in the water table and of air, water, soil and other effects, which may arise from the development. Regarding the creation of new habitats, Saved Policy EC5 of the Local Plan seeks the retention of certain on-site ecological features, enhancement of the nature conservation and ecological interest of sites or create new habitats.



Policy 7.19 of the London Plan states that the planning of new development and regeneration should have regard to nature conservation and biodiversity and opportunities should be taken to achieve positive gains for conservation through the form and design of development.

The application site lies within 100 metres of the River Pinn and Kings College Playing Fields SINC (Site of Importance for Nature Conservation), a Local Wildlife Site. Ruislip Woods National Nature Reserve (NNR) and SSSI is situated less than 400 metres to the north. The woodland and wetland habitats, and the mature trees around The site, make this environment highly suitable for bats. As a Green Chain in Hillingdon's Local Plan, and is also recognised as part of the All London Green Grid and Blue Ribbon Network. These designations acknowledge the importance of such local green infrastructure, both for wildlife and amenity value.

An ecological survey has been submitted in support of this application. This is a 2010 assessment and relates to a previous scheme. This is not considered acceptable, particularly as the new proposals results in the loss of the wildlife corridor to make way for the proposed car park. One of the main concerns relates to this additional car parking area and footpaths being created near the existing club house. The car parking will result in the loss of two mature trees and a line of scrub and saplings that run along a drainage channel. This area is likely to be of a higher value to a range of species. It also helps provide a supporting wildlife corridor for that along the River Pinn.

A full assessment of this corridor and the implications for its loss would need to be provided, but no ecological information has been submitted regarding the value of this area. It has features, including the water channel, mature trees, and scrub that would be considered suitable for protected species. Natural England standing advice requires at least a broad assessment of the value of these areas, prior to determination. If further survey work is required, this should also be done before determination.

Natural England notes that there is the potential for indirect impacts upon bats to occur from this development, as a result of the floodlighting proposed. It notes that no specific bat surveys have been undertaken of the site, to ascertain the species that may be using the river corridor for feeding and commuting, or their relative abundance. It also notes that a post construction light contour plan has been provided, but there does not appear to be a comparison with the current light levels at the site. Consequently Natural England has requested further information before determination of this application:

- Details of the current light levels at the application site and adjacent river and tree corridors;
- Details of the periods of the day the floodlighting will be used and how this will vary seasonally;
- Details of the indirect impacts that may result from this scheme upon bats; and
- Detailed mitigation measures that are to be implemented to avoid, minimise and compensate for any impacts that are identified in relation to bats.

With regard to great crested newts, Natural England recommends that further clarity is provided from the applicant as to the likelihood of great crested newts being impacted by this proposal. Such information should be provided before determination of the application, and no such information has been provided.

The Environment Agency has objected to the scheme as the assessment and mitigation of

the risks to the River Pinn and associated ecology are inadequate. Particular concerns raised by the Agency relate to the high levels of light spill into the river corridor and buffer zone, failure of the submitted Ecological Appraisal report to take account of the revised proposals and failure to adequately address the risks to protected species that may be affected by the proposals.

The applicant was made aware of the above mentioned concerns and given the opportunity to address these issues. The applicant has indicated that further surveys will be carried out, but these had not been undertaken at the time of writing this report.

With regard to the light spillage, the applicants have suggested that louvring (guards to lower rear spillage) be installed on to the luminaires on the stream and the west end side of the pitch, which it is claimed, would reduce the light spillage from the proposed development to zero or 1 lux along the River Pinn. The applicants have also considered the cumulative effect with the existing pitch lighting and acknowledge that this would require additional mitigation. Therefore, as recommended in the Ecology Report, the applicants suggest planting some additional trees along the river corridor in the immediate vicinity of the application site, in order to reduce light spillage to acceptable levels. Both the Environment Agency and Natural England were reconsulted, but have not withdrawn their objections to the scheme on ecological grounds.

In conclusion, it is considered that the submitted ecological assessment has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area. The proposal is therefore contrary to Policies EM3 and EM7 of the Hillingdon Local Plan: Part 1 "Strategic Policies" (adopted November 2012), Policies EC2, EC3 and EC5 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy 7.19 of the London Plan and the NPPF.

#### **7.15 Sustainable waste management**

Not applicable to this application.

#### **7.16 Renewable energy / Sustainability**

Not applicable to this application. Accordingly, it does not have any implications with regard to renewable energy or sustainability.

#### **7.17 Flooding or Drainage Issues**

Policy EM6 (Flood Risk Management) of the Local Plan Part 1 Strategic Policies (Adopted Nov 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. Saved Policies OE7 and OE8 of the Local Plan Part 2 seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding.

The site lies within Flood Zone 3 and large proportion of this within the functional flood plain Flood Zone 3b. This is an area that has previously flooded in a number of flood events the most significant of which was 1977.

A Flood Risk Assessment (FRA) has been submitted in support of the application. However, the Principal Flood and Water Officer raises a number of concerns, as the FRA is considered to provide insufficient information on which to assess the full implications of the proposal on flood risks from all sources, and therefore demonstrate that the proposal will not increase flood risk to others.

Flood risk

A preliminary sequential test undertaken as part of the FRA, suggests that as the proposal

is considered to be water compatible development and therefore a suitable development at this location.

However, it is noted that the aim of the sequential test is to ensure that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development, in areas with a lower probability of flooding. A sequential test was undertaken by the Council for the previously withdrawn application for a similar scheme in 2011. This concluded that the new pitch had to be linked to the existing facilities and that there were limited alternative areas for the new facility to be located.

Nevertheless, the Principal Flood and Water Officer notes that although the pitch is deemed as water compatible development, the practicality of this type of pitch in this location is called into question, as it is likely to be subject to frequent flooding, resulting in considerable restoration and cleaning works. This does not appear to have been explored fully within the flood risk assessment.

The proposal for the artificial pitch includes the lowering of areas to provide additional flood plain storage. Full level for level calculations have been submitted, which demonstrate that overall, there is clearly no loss of flood plain storage and the levels proposed in relation to flood storage are therefore acceptable. In addition, the Principal Flood and Water Officer considers that the proposed fencing would result in only a very localised impedance on flood flows and storage.

However the extension to the car park is considered to raise very different and more substantial risks, lying in the Flood Zone 3. Any uses must be designed and constructed to remain operational and safe for users in times of flood and not impede water flows. The FRA suggests that the risk to the car park will be in the 1 in 20 year flood events and a flood level of up to 300mm across the whole car park. In some areas of the car park, this rises to a depth of 700mm, which is acknowledged in the FRA. The Principal Flood and Water Officer notes that a depth of 300mm is sufficient to float a car, particularly with a fast flowing river. The risk in this area is therefore substantial and the rebuttal letter from the applicant dated 5th Feb 2013 assesses this risk and confirms that the risks on the proposed site are a 'Hazard to all'.

The proposal put forward by the FRA for managing the risk to others created by the use of this area as a car park, is to use hedging to contain any cars to prevent them being washed away. However, a hedge may also attract debris and cause blockages and therefore also impede flow to an area of functional floodplain.

The Principal Flood and Water Officer also raises concerns with regard to the existing ditch running through the site. This is a passage through which water flows and therefore would be classed as an ordinary watercourse. As such, the channel should be retained to maintain space for water. The proposal drawings show culverting of that ditch, but makes no assessment of the implication of this on the flood risk at the site. The submitted documentation refers to the preliminary design of these crossings but no detail has been provided. Timber rafts are proposed to span the ditch. However, it is assumed that these rafts will require foundations. In the proposed locations, this falls within a no dig area, to minimise the impact on the trees on site. This may therefore make the proposals unfeasible. In addition, an assessment of the proposed footpath and car access has not been provided, to demonstrate that it will not impact on flood flows and flood storage.

It is also considered that insufficient information has been provided with regard to the management of the the residual risks after a flood event. There is no assessment of the

ability to provide this. In terms of an emergency plan, further details of the way the car park will be managed, including access would be required.

#### Drainage

There is current land drainage on site across the area proposed for the new pitch. The Principal Flood and Water Officer notes that this has not been assessed by the FRA. The proposals to lower the ground levels at the location of the pitch, combined with the sub-base (approximately 400mm deep) and concrete edging proposed, are likely to have an impact on the land drainage across the site. Sport England requirements that the pitches are drained in order that they are not waterlogged appears to contradict the statement in the FRA that no formal drainage would be required, and therefore the proposals would meet requirements for Greenfield run off rate.

There are also requirements on the design of any outfall from the Environment Agency which need to be met. It would appear that with the new outfalls which may need to be constructed to deal with changes in any drainage arrangement on site, gravitational drainage of the site will be difficult, and therefore it has not been demonstrated that a sustainable system would work. Therefore in order to full understand the implications of the proposal, further detail of the substrata on the site and existing land drainage would be required, together with a demonstration that suitable sustainable drainage could be designed with the proposed levels on the site and river levels.

#### Conclusion

It is considered that the application fails to fully assess the implications of the proposal on flooding, or demonstrate that the application will not increase flood risk to others. In addition, the application has failed to demonstrate that flood risk can be suitably mitigated. The proposal is therefore contrary to Policy EM6 (Flood Risk Management) of the Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policies OE7 and OE8 of the Local Plan Part 2 Saved UDP Policies, Policy 5.12 and 5.13 of the London Plan (July 2011) and the Technical Note Planning Policy Statement 25. It is therefore recommended that the application be refused on this basis.

### **7.18 Noise or Air Quality Issues**

#### NOISE

Saved Policies OE1 and OE3 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to protect the environment from the adverse effects of pollutants and to ensure sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable. There are no limitations to the hours of use of the current sporting facilities. However, the effects of floodlighting and noise associated with a more intensive use of the site on residential amenity are matters for consideration. The issue of floodlighting has been dealt with elsewhere in this report.

In order to reduce any negative impact on the adjoining houses, the applicants submit that the development has been located centrally within the larger site, away from adjoining properties.

Traffic to the proposed development would utilise the existing access of Kings College Road and it is not considered that the additional vehicle movements associated with the proposed development would result in the occupiers of surrounding properties suffering

any significant additional noise and disturbance or visual intrusion, in compliance with Policy OE1 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

A noise assessment, including the results of a noise survey has been submitted in support of this application. The report identifies 80 Park Avenue as being the closest dwelling to the proposed astroturf pitch, although it is noted that the flats at Kings College Pavilion are located approximately 25 metres closer to the proposed pitch and approximately 40 metres closer to the existing pitch. The report provides result of the survey in terms of measurements and calculations at various receptors nearby and comparisons have been made with the Council's SPD on Noise. Cumulative impact assessment of the two pitches operating at the same time has also been carried out.

The Environmental Protection Unit has reviewed the above noise survey report and is satisfied that the assessment has been undertaken correctly and that the noise levels are within the requirements of the Council's SPD on noise. However, the report does highlight that impact noise (i.e. LAMax) does increase at position D (80 Park Avenue) by 4.2dB. In order to mitigate the projected noise impacts and in order to ensure the proposed pitch implements all reasonable measures to reduce impact noise, the Environmental Protection Unit recommends a condition in the event of planning permission being granted, requiring a scheme which specifies the provisions to be made for the control of noise emanating from the site. The scheme would include details of the rebound board treatment around the pitch and such combination of physical and administrative and other measures as may be approved by the Local Planning Authority. A condition limiting the hours of use would also be necessary.

Generally, the distance between residential properties and the proposed all weather court should ensure no adverse noise impact on residential properties. Subject to the suggested condition, it is not considered that the residential amenities of surrounding occupiers could be adversely

affected by the proposals in terms of noise, in accordance with Saved Policies OE1 and OE3 of the Hillingdon Local Plan Part 2 (Nov. 2012).

#### **7.19 Comments on Public Consultations**

The current application has generated a significant amount of local interest, with hundreds of letters making representations and a petition bearing thousands of signatures. The main issues have been covered in the main body of the report.

However, one of the main concerns raised by local residents and amenity groups is that due to the enclosure of the proposed facility, public access to and through the area will be greatly restricted. They contend this land was bequeathed to the local community for recreational purposes. Approval would result in a further loss of public open space for the exclusive use of a private club, which would run against the covenants and spirit of the 1930's conveyance, where the intention was that the land be used as public open space for the benefit of the local community. Local residents contend that other recreational groups currently making use of the Green Chain feel able to share amenity space with the community. Both the football and cricket uses on the Kings College Playing Fields embrace community use rather than exclude it.

The Meadows were given to the then Urban District Council of Ruislip - Northwood for purposes of public walks and pleasure grounds and for the purposes of cricket, football or other games (such purpose to include a swimming pool) all of which were encouraged under the Public Health Act of 1925. Clearly, an enclosed swimming pool would have a

similar impact to the all weather pitch, in terms of conversion of some of the grassland into an enclosed area. Indeed a swimming pool was envisaged and specifically encouraged by the donors of the playing fields. This would have a similar impact as a fenced all weather facility.

Clearly, the erection of fencing would restrict public access to the pitch itself, and pitch users will be obliged to meet the requirements of the hockey club. However, the proposed all-weather pitch will not restrict public access along the majority of the Green Chain and may encourage further recreational use of this area. It is noted that Policy EM2 does not define what would constitute appropriate public access and recreational facilities. It is considered that the introduction of a fenced all-weather hockey pitch is an open recreational facility, and the lack of unrestricted public access is not considered to be a sustainable reason to refuse the application.

With regard to the request to designate Pinn Meadows as a Village Green, this is not a matter which can be addressed as part of this application, nor is it a material planning consideration that could be taken into account in determining this application.

On the question of land ownership, applicants are entitled to submit applications for development on land not within their ownership, provided the correct notices are served. In this case, the correct notices were served on the Council. However, it is important to note that planning permission does not override property rights or any covenants on the land that may exist.

The planning process cannot pre-empt any decision by the Council as freeholder or superior landlord. These are separate processes. The planning application must be determined solely on its planning merits.

## **7.20 Planning Obligations**

Policy R17 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) is concerned with securing planning obligations environmental improvements and enhancement. This UDP policy is supported by specific Supplementary Planning Guidance.

If the application were to be considered for approval, the following broad Section 106 Heads of Terms would be pursued by the Council:

1. An undertaking by Eastcote Hockey Club to refurbish, and subsequently to maintain, the full size pitch within the existing running track and the running track itself, in order to providing free of charge training/exercise facilities to the community (offered by the applicant apart from ongoing maintenance).
2. The laying out of five grass pitches on the site (3 mini & 2 youth/full) and the grant access of Eastcote Hockey Club to Ruislip Rangers JFC. This is a requirement of Sport England. (The applicant has offered to extend the period of tenure afforded to Ruislip Rangers JFC from 15 to 21 years).
3. Community Use Scheme to include details of pricing policy, hours of use, access by other sports clubs and /non-members, management responsibilities and include a mechanism for review (A requirement of Sport England).
4. Refurbishment of the public footpath with Cotswold gravel or similar appropriate material. These measure to upgrade and maintain the footpath to deal with increased footfall have been identified. The enhancement of the public footpath in the location of the development has not been pursued with the applicants, as the application is being recommended for refusal.

With regard to obligations 1, 2 and 4, given that the replacement/refurbished facilities and public footpath are located beyond the site boundary, a planning obligation would be required to secure the provision of these facilities.

At the time this report was produced, no Unilateral Undertaking or S106 Agreement has been completed in relation to the above mentioned planning benefits associated with the proposal. It is therefore considered that planning permission should also be refused for this reason.

#### **7.21 Expediency of enforcement action**

There are no enforcement issues directly related to the application site, although there are ongoing enforcement investigations regarding the hours of use of the existing all weather pitch.

#### **7.22 Other Issues**

None.

### **8. Observations of the Borough Solicitor**

When making their decision, Members must have regard to all relevant planning legislation, regulations, guidance, circulars and Council policies. This will enable them to make an informed decision in respect of an application.

In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights (the Convention) directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

Article 6 deals with procedural fairness. If normal committee procedures are followed, it is unlikely that this article will be breached.

Article 1 of the First Protocol and Article 8 are not absolute rights and infringements of these rights protected under these are allowed in certain defined circumstances, for example where required by law. However any infringement must be proportionate, which means it must achieve a fair balance between the public interest and the private interest infringed and must not go beyond what is needed to achieve its objective.

Article 14 states that the rights under the Convention shall be secured without discrimination on grounds of 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status'.

### **10. CONCLUSION**

Whilst there is no objection to the principle of a more intensive use of the site for sporting activities, the proposal raises a number of environmental concerns. The proposal would introduce hard surfaced areas, fencing, floodlighting and car parking and remove distinctive landscaping features that would result in a built-up appearance on the site, which is designated as Green Chain land. The proposals will impact significantly on the openness of this part of the Green Chain, while the nature conservation interests of the site and nearby River Pinn corridor will fail to be preserved. It is considered that the

current proposal will impact on the important linear views across the meadow. The height and density of the fencing would change the character of the meadows, whilst the Celandine route will become restricted. The proposal will impact on the integrity of this route, and would fail to enhance the local character, visual amenity, ecology and sustainable access to the river walk.

It is not considered that any adverse impact on the open space has been outweighed by the benefits associated with the new facilities. In addition, Sport England is unable to confirm that the proposed development still meets exception E5 of its playing field policy. As such, the principle of the development in this location cannot be supported.

It is not considered that development would adversely affect the amenities of nearby residential properties from noise and light spill generated by the floodlit pitch

However, the applicant has failed to demonstrate that the existing group of Oak trees, deemed worthy of retention will be unaffected by the development and has not made provision for their long-term protection. In addition, the submitted ecological assessment has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area. Both the Environment Agency and Natural England have objected to the scheme, as the assessment and mitigation of the risks to the River Pinn and associated ecology are inadequate.

Furthermore, the application fails to fully assess the implications of the proposal on flooding, demonstrate that the application will not increase flood risk to others, or demonstrate that flood risk can be suitably mitigated.

Further information is required in order to confirm that parking demand associated with the proposed development has been adequately addressed. As such, an objection is raised to the scheme on highway grounds.

In addition, no agreement has been completed with the applicant in respect of contributions towards the improvement of the public footpath, community uses and the provision and safeguarding of football pitches adjacent to the site and the grant access by the applicant to Ruislip Rangers JFC.

It is therefore recommended that planning permission be refused for these reasons.

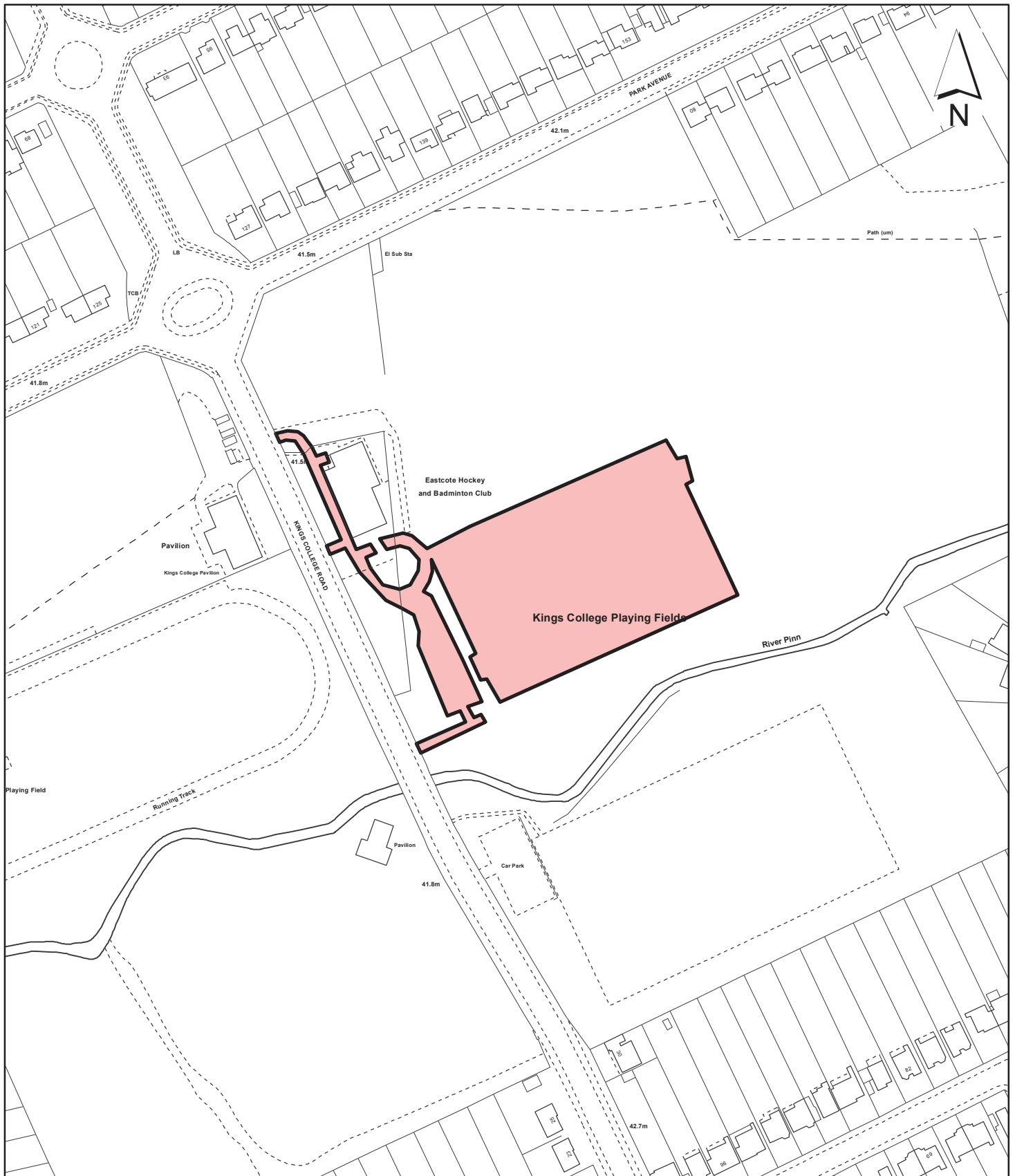
## **11. Reference Documents**



- a) The National Planning Policy Framework (March 2012)
- (b) Hillingdon Local Plan Part 1 Strategic Policies.
- (c) Hillingdon Local Plan Part 2 Saved UDP Saved Policies (November 2012)
- (i) Supplementary Planning Document Accessible Hillingdon
- (j) Supplementary Planning Guidance Community Safety by Design
- (k) Supplementary Planning Guidance Air Quality
- (l) Supplementary Planning Guidance Noise
- (m) Supplementary Planning Guidance Planning Obligations
- (n) London Plan (2011)

**Contact Officer:** Karl Dafe

**Telephone No:** 01895 250230





<p><b>Notes</b></p> <p> Site boundary</p> <p>For identification purposes only.</p> <p>This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act). Unless the Act provides a relevant exception to copyright.</p> <p>© Crown copyright and database rights 2013 Ordnance Survey 100019283</p>	<p>Site Address</p> <p><b>Eastcote Hockey Club Kings College Road Ruislip</b></p>		<p><b>LONDON BOROUGH OF HILLINGDON</b></p> <p><b>Residents Services</b></p> <p>Civic Centre, Uxbridge, Middx. UB8 1UW Telephone No.: Uxbridge 250111</p>
	<p>Planning Application Ref:</p> <p><b>2414/APP/2012/2812</b></p>	<p>Scale</p> <p><b>1:2,000</b></p>	
	<p>Planning Committee</p> <p><b>North</b></p>	<p>Date</p> <p><b>March 2013</b></p>	