

Report of the Head of Planning & Enforcement Services

Address KINGS COLLEGE PLAYING FIELDS KINGS COLLEGE ROAD RUISLIP

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

LBH Ref Nos: 2414/APP/2011/2661

Drawing Nos: EHC-ESP-01
EHC-ESP-02
EHC-PSP-01
EHC-PSP-01
X2010387A-04C
Supporting Statement
Noise Report Dated 18/11/10
Lighting Secification Dated 3/12/2010
Ecological Appraisal Dated Nov. 2010
Flood Risk Assessment Ref: X210387FRA REV. C
Level and Volume Changes O8-12-11
Storage Calculations
EHC/1 Floodlight Spillage
Design and Access Statement
Ecological Appraisal
Transport Impact Study

Date Plans Received: 01/11/2011 **Date(s) of Amendment(s):**
Date Application Valid: 07/11/2011

1. SUMMARY

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

197 individual letters of objection and 5 petitions, with over 20 signatures, have been received, objecting to the planning application. In addition, objections have 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 green chain land, impact on residential amenity arising from noise and floodlighting, impact on local ecology, flooding, disruption to the public right of way and highway considerations.

Sport England advise that in this case they will not oppose the granting of planning permission involving the loss of part of the playing field, as the proposed development is for an 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. The proposal would safeguard existing sports facilities. No objections are therefore raised to the principle of the intensification of use of the playing fields.

Whilst it is acknowledged that the all weather sports pitch, with its associated fencing and floodlighting will have an urbanising effect on the existing playing fields, it is not considered the fundamental open character of the area would be affected by the proposal. It is considered that any adverse impact on the open space has been

outweighed by the benefits associated with the new facilities, which are appropriate to this green chain location and should help to improve recreational facilities in this area.

The location of the proposed all weather pitch has been moved northwards compared with the previously withdrawn scheme, so that Public Right of Way will remain uninterrupted by the development. Whilst it is considered important that the attractiveness of the Celandine Route is maintained, it is not considered that the proposal would have such a detrimental effect on the visual amenity of the public footpath as to justify refusal on these grounds.

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.

The application has demonstrated that the proposed development could be completed without detriment to the recognised ecological value of this area, including the adjacent River Pinn corridor. In addition, subject to conditions recommended by the Environment Agency, it is considered that development would not increase the risk of flooding, and the statutory functions of the Agency would not be compromised.

However, the Council's Highway Engineer raises objections to the proposal, as the applicant has failed to provide an accurate quantitative and qualitative assessment of the transportation aspects of the proposed development. The proposal would result in inadequate provision for off street car parking to deal with the demands of the development, which is likely to lead to conditions prejudicial to the free flow of traffic and highway and pedestrian safety. In addition, construction of the pitch and a footpath link to the clubhouse will involve excavations within the canopy and root protection area of Oak trees at the western edge of the proposed pitch, to the detriment of their survival and 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 and the provision and safeguarding of football pitches adjacent to the site, including the grant access by Eastcote Hockey Club to Ruislip Rangers JFC. 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 application fails to provide an accurate and robust assessment of the transportation impacts of the development, including traffic generation, car parking, coach/bus parking and cycle parking. As such, the application has failed to demonstrate that adequate on site car parking could be provided to deal with the demands of the proposed development, which are unlikely to be addressed by public transport capacity and would be likely to cause on-street parking, to the detriment of highway and pedestrian safety and free flow of traffic. This is contrary to Policies AM7, AM9, AM14, and R16 of the Borough's adopted Unitary Development Plan Saved Policies (September 2007) and the Council's Parking Standards.

2 NON2 Non Standard reason for refusal

The proposed development, by reason of its juxtaposition with existing trees would result in trees dominating and overshadowing the proposed playing pitch. As a consequence there would be likely to be pressure to lop, top or fell the trees to the detriment of the visual amenity of the area. In the absence of a tree survey/arboricultural implications assessment to BS 5837:2005, the applicant has failed to demonstrate that the tree(s) will

be unaffected by the development and has not made provision for its/their long-term protection. As such, the proposal would be contrary to Policies BE19, and BE38 of the Hillingdon Unitary Development Plan Saved Policies September 2007.

3 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 Unitary Development Plan Saved Policies September 2007, and the adopted Supplementary Planning Document 'Planning Obligations.

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.

A7	Developments likely to increase helicopter activity
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
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
BE19	New development must improve or complement the character of the area.
BE26	Town centres - design, layout and landscaping of new buildings
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
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
OL11	Green Chains
R16	Accessibility for elderly people, people with disabilities, women and children
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
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves

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
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
LPP 2.18	(2011) Green Infrastructure: the network of open and green spaces
LPP 3.16	(2011) Protection and enhancement of social infrastructure
LPP 7.12	(2011) Implementing the London View Management Framework
LPP 7.15	(2011) Reducing noise and enhancing soundscapes
LPP 7.18	(2011) Protecting local open space and addressing local deficiency
LPP 7.19	(2011) Biodiversity and access to nature
LPP 7.2	(2011) An inclusive environment
LPP 7.21	(2011) Trees and woodland
LPP 7.3	(2011) Designing out crime
LPP 8.2	(2011) Planning obligations
PPS1	Delivering Sustainable Development
PPS25	Development & Flood Risk
PPS9	Biodiversity and Geological Conservation
SPD-NO	Noise Supplementary Planning Document, adopted April 2006
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008
SPG-CS	Community Safety by Design, Supplementary Planning Guidance, adopted July 2004

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The submitted plans indicate the Public Right of Way will be subject of an application to lay artificial stone paving (asp) along a section of the footpath to access the development. The applicant is informed that asp is not considered an environmentally sensitive option for a riverside meadow location.

3. CONSIDERATIONS

3.1 Site and Locality

The site forms part of Kings College Playing Fields and is Council owned. The proposed development site covers an area of approximately 0.6720ha (6720m².) 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 Metropolitan Open Space and part of a Green Chain in the Saved UDP. 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. Along the western boundary ,there is a shelter belt of woody vegetation including hedges. 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/2010/2676, which was withdrawn in February 2011.

It is proposed that the pitch will be 101.5mx 66m in extent, the footprint of which will mirror the existing all-weather pitch on the open space to the south of the River Pinn. The proposed pitch will be fenced to a height of 3 metres, increasing to 4.5 metres for 21 metre lengths behind each goal area. The base of the fence would be surrounded with a double height timber "kick" board, approximately 250mm high, to rebound balls. The fencing material specified is plastic-coated welded mesh panels, factory-finished in dark green. The proposal includes 4, 15 metre high flood lights on either side of the pitch.

The proposed all-weather pitch will be primarily used as a hockey pitch but will be available for other sports and will result in the loss a standard football field. 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 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

The report concludes that the flood risk to the site and surrounding area will not be increased by the development. The proposed development is therefore in accordance with PPS25.

TRANSPORT IMPACT STUDY

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.

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 there is a long planning history for the area. 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 astro turf 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).

4. Planning Policies and Standards

UDP / LDF Designation and London Plan

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

Part 1 Policies:

Part 2 Policies:

A7	Developments likely to increase helicopter activity
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
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
BE19	New development must improve or complement the character of the area.
BE26	Town centres - design, layout and landscaping of new buildings
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
OE1	Protection of the character and amenities of surrounding properties and the local area
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OL11	Green Chains
R16	Accessibility for elderly people, people with disabilities, women and children
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
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
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PPS1	Delivering Sustainable Development
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5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **25th November 2011**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

The Notice of Proposed Development was advertised under Article 8 of the Town and Country Planning (General Development Procedure) Order 1995 and 290 neighbours and local amenity groups were consulted in the surrounding area. Site Notices were posted at the site.

197 individual letters of objection (46 letters/e-mails and 151 internet responses), together with 6 petitions bearing 4, 200, 41, 36, 26 and 24 signatures respectively 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 set out below, although it should be noted that these represent a summary of the full objections:

1. further loss of public open space for the exclusive use of a private club, which would run against the spirit of the 1930's conveyance, where the intention was that the land be used as public open space in perpetuity.
2. support the guidance of the GLA on the importance of protecting Metropolitan Open Land.
3. The area in question in Hillingdon's LDF as Metropolitan Open Land.
4. Outrageous that anybody should claim for their sole use, land that is common property.
5. Fencing off this land is totally unacceptable, both in terms of aesthetics as well as in concept.
6. Outraged by the infringement of the public right of way across this field.
7. There are already two underused facilities locally.
8. The fields were for the people of Ruislip not for a quasi National Hockey Centre.
9. A public rural site would become commercial.
10. King's College Cambridge gave this land to the then Ruislip-Northwood District Council 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.
11. Opposed to the greedy enclosure of another astro pitch thus excluding the public permanently from this much loved and used open space.
12. This area will become confined to the exclusive use of those who play the relevant sports associated with it.
13. The site is not appropriate 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, noise, light and litter pollution.
14. 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.
15. Loss of amenities and change of character of a protected area.

16. The enclosure and floodlighting would seriously harm the visual amenity and nature conservation value of the landscape.
17. Increased congestion.
18. It will be overbearing as a construction.
19. 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.
20. More facilities would be needed at the clubhouse with the extra pitch.
21. The Celendine Route runs along the River and is promoted by the Council as a route through, Green Spaces, Conservation areas and Wildlife Havens. The route would be spoilt if the public footpath were to be go along a narrow corridor between 4m high security fencing and when in use being blinded by floodlights.
22. 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.
23. The site in question, bordering the River Pinn is flood plain zone 3 and has in the past been underwater.
24. The site is within a flood plain and there is real concern that this could result in a displacement of flood water to the surrounding area.
25. The area in question does not naturally drain easily and remedial work has been necessary to improve the drainage for this area of our playing fields. Any ground works will come into conflict with these existing remedial ground drains.
26. The proposal would negatively impact on wild life habitat.
27. The River Pinn is an important corridor for wildlife, bats are very active along it and along the tree lines, Egrets and Kingfishers are regularly seen.
28. The car park adjacent to the existing astro pitch is not private, although kept locked for security with EHC as the key holder it is a public car park and was only locked after fly tipping and boy racers had accessed the field around the site.
29. There is already significant traffic congestion and parking problems on match days which particularly impact near neighbours. The proposal would exacerbate the problem.
30. 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 hard standing.
31. The £150,000 subsidy to build this unnecessary facility will come from our council tax.

PETITIONS

1. A petition bearing just over 4,000 signatures has been received. However, only 2,722 signatures are considered valid from residents living within the Borough. 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 while 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. A separate petition bearing 26 signatures, objecting on similar grounds to the petition listed above.

3. A petition on behalf of Friends of Eastcote Gardens, bearing 42 signatures. The signatories object on the following grounds:

We regularly walk to and enjoy the beautiful gardens tended by volunteers of the Walled Garden. Any plans for development in the area or changes in funding that may affect access to the gardens and associated areas surrounding the gardens would be most unwelcome.

(NB The group, Pinner Historic Walks frequently use the Celandine Route, visiting Eastcote Gardens along the way. Although the group is from Harrow Borough, they are users of the Celandine Route and would like to add their objections to the proposed development.

4. A petition submitted by Eastcote Village Conservation Area Advisory Panel bearing 24 signatures. The signatories object to the proposals on for the following reason:

The erection of a second Astro turf pitch will be ecologically damaging to the River Pinn.

5. A petition bearing 36 signatures has been received objecting on the following grounds:

We oppose the plans of Eastcote Hockey Club to build a second fenced off pitch on land that was given by Kings College to the people of Ruislip and Northwood for everyone to enjoy. The parking at peak times causes significant problems at the moment and would get much worse. The area is in a flood plane and should be kept as open fields with access for everybody.

LETTERS OF SUPPORT

One letter of support has been received to the public consultation. In addition, the application was accompanied by 415 letters of support. These comprised five individual letters or e-mails. The remainder were pro-formas. Of these, 181 showed addresses within the Borough and 234 supporters were not residents of the Borough. This means that 43.6% of the responses in support were valid as Hillingdon residents.

SPORT ENGLAND

It is understood that the site forms part of, or constitutes a playing field as defined in Article 10(2) the Town and Country Planning (General Development Procedure) Order 1995 (as amended by SI 1996/1817 and SI 2009/453), 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 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 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 101.5m x 66m in size. The application is the resubmission of application ref 2414/APP/2010/2676, which was withdrawn in February 2011.

Sport England is satisfied that the proposed development accords with the following policy exception to it's playing fields policy:

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.

That said, Sport England would expect some formal commitment on the part of the Eastcote Hockey Club to grant access by Ruislip Rangers JFC to the five grass pitches on the site (3 mini & 2 youth/full). As such, Sport England requests that the following planning condition be imposed on any grant of permission:

Prior to the commencement of the use/development a Community Use Scheme shall be submitted to and approved in writing by the Local Planning Authority. The Scheme shall include details of pricing policy, hours of use, access by other sports clubs and/non-members, management responsibilities and include a mechanism for review. The approved Scheme shall be implemented upon commencement of use of the development.

This being the case and subject to the above condition being imposed, Sport England does not wish to raise an objection to this application.

If you wish to amend the wording of the conditions or use another mechanism in lieu of the condition(s), please discuss the details with the undersigned. Sport England does not object to amendments to conditions, provided they achieve the same outcome and we are involved in any amendments.

The absence of an objection to this application in the context of the Town and Country Planning Acts, does not in any way commit Sport England's or any National Governing Body of Sport's support for any related application for grants funding.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

ENVIRONMENT AGENCY

The site is located in Flood Zone 3b as defined by your Strategic Flood Risk Assessment. This classification is given to the areas at the highest risk of flooding. Outdoor recreation uses are only permitted within Flood Zone 3b providing the proposed development will not be at an unacceptable risk of flooding and it increase flood risk elsewhere. We are satisfied that this will be the case providing the conditions below are placed on any permission granted for this proposal.

Condition 1

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) and revised plans submitted by Hannah-Reed on email 9 December demonstrating provision of compensatory flood plain storage for all floods on site up to the 1 in 100 year plus climate change flood standard.

Reason

To ensure flood risk is not increased. To ensure that compensatory storage of flood water to prevent increasing flood risk elsewhere.

Condition 2

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) Revision C. In particular, limiting the surface water run-off generated by the 1 in 100 year plus climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.

Reason

To prevent an increase in the risk of flooding by ensuring that surface water is appropriately stored and drained from the site.

Condition 3

Prior to the commencement of development a scheme for the provision and management of a buffer zone alongside the River Pinn shall be submitted to and agreed in writing by the local

planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The scheme shall include:

plans showing the extent and layout of the buffer zone;
details of any proposed planting (which must be of native species);
details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term;
details of any footpaths, fencing and lighting from the sports playing pitch.

Reason

To prevent the increased risk of flooding and to protect the ecological value of the river corridor as a habitat. To ensure that any planting or lighting is appropriate and will not have a detrimental impact on the river corridor. To provide sufficient access to the River Pinn for any maintenance required.

Condition 4

Any walls or fencing constructed within or around the site shall be designed to be permeable to flood water.

Reason

To prevent increasing flood risk off site by ensuring that any walls or fencing do not obstruct the flow or the storage of flood water.

THAMES WATER

With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the options available at this site.

With regard to water supply, this comes within the area covered by the Veolia Water Company.

RUISLIP RESIDENTS ASSOCIATION

We are supporting The Friends of Pinn Meadows, other local interest groups and concerned residents in their strong objections to the proposed construction of a further all-weather multi purpose sports playing pitch. We believe that on a number of levels fully justifiable reasons can be put forward as to why this planning application should be refused.

1. Approval would result in a further loss of public open space for the exclusive use of a private club and this certainly runs against the spirit of the 1930's conveyance where the intention was that the land be used as public open space in perpetuity.
 2. We consider that in recent presentations by the hockey club their case was not made that there was actually a need for a further pitch certainly for hockey purposes.
 3. The enclosure and floodlighting would seriously harm the visual amenity and nature conservation value of the landscape. It should be pointed out that council policy is expected to conserve and enhance this.(see UDP 1.11).
 4. The site is within a flood plain and there is real concern that this could result in a displacement of flood water to the surrounding area.
 5. There is already significant traffic congestion and parking problems on match days which particularly impact near neighbours without exacerbating the problem which surely would occur should the application be successful.
 6. The proposal would negatively impact on wild life habitat which we feel should be protected from any further development.
- To summarize Ruislip Residents Association consider there are no compelling reasons as to this application having any more merit than the earlier one which was withdrawn and recommend it be declined.

RUISLIP, NORTHWOOD AND EASTCOTE LOCAL HISTORY SOCIETY

The Society is opposed to this application to build a second Astroturf hockey pitch on the King's College playing fields because of the detrimental effect it will have on a historic rural landscape, which has been public open land since the 1930s.

The pitch is to be completely enclosed by steel mesh fencing of heights from 3 to 4.5 metres which will destroy the open views across the area. The fact that the fencing is to be green will not help the structure to blend into the site. The eight floodlights around the pitch at a height of 15 metres each will similarly be very intrusive and ruin the country feel of the area. Further green space will be lost with the provision of a three slab wide concrete path from the entrance gate to the pitch and along one side of the pitch to the club house.

There will also be disruption to the Celandine Way public footpath.

The conveyance of 1938 made when the land was sold to Ruislip Northwood Urban District Council mentions the land being for public open space. It does not seem to be honouring the spirit of that sale to grant permission to a private hockey club to build a second pitch on that open land thereby encroaching on the amount of accessible land available to the public. We request that this application be refused so that this important landscape is conserved for everyone's enjoyment.

EASTCOTE VILLAGE CONSERVATION AREA ADVISORY PANEL

We write in support of our colleagues, the Ruislip Residents Association, Friends of Pinn Meadows, Ruislip Village Conservation Area Advisory Panel and local residents.

This is a very contentious application and is being strongly resisted. This proposal will affect the whole of the Pinn Corridor, stretching from Eastcote to Uxbridge, also known as the Celandine Route.

There are many areas of concern:

- Loss of public amenity.
- Flood Risk
- Traffic congestion
- Light Pollution

- Habitat destruction
- Accessibility
- Public safety

Many of these areas will be covered further in greater detail by other objectors.

The Pinn Meadows.

It was established in 1999, Countryside Stewardship Scheme, by MAFF [now DEFRA] that the Pinn Meadows should be considered as a whole linear area not in fragmented sections. The objects of the scheme both National and Local to Sustain the beauty and diversity of the Landscape. Improve and extend wild life habitats.

The Mayor of London's Plan, section 3D.2 states that 15Km of Riverside Habitat should be restored per annum. Section 3.316: Planning Applications should give full consideration to effects, both direct and indirect, of development on biodiversity, wild life habitat and geology. Indirect effects include increased use and disturbance, hydrological changes, levels of noise, pollution, shading and lighting distribution.

London Borough of Hillingdon Open Space Strategy adopted September 2011.

Page 34 Minimum Quantity standard for Unrestricted Recreational Open Space. A Borough wide quantity standard of 2.0ha of Unrestricted Recreational Open Space per 1,000 of the population. [Please note Unrestricted]. Page 37 4.2.1 .shows that there is deficiency of access to Unrestricted open space in Eastcote/East Ruislip and Northwood Wards.

London Borough of Hillingdon, Draft Landscape Character Assessment 2011.

This assessment has identified the Pinn Meadows as an area of great beauty. Also, that the Pinn Meadows are a Special Tranquil site. With links to the historic Eastcote House Gardens, Ruislip and Woods. Character Area G1 identifies, the importance of the Pinn River Corridor, for providing a break in the urban area giving a transition into Ruislip Woods. It also identifies the sensitive nature of this area, the Pinn Meadows are a pinch point therefore the whole ecology is vulnerable to the adverse effect of development.

Mayor of London Draft Green Grid Plan. The purpose of this plan is to provide a buffer zone between the countryside and the London Urban sprawl. The Pinn Meadows have been identified as an important area of this buffer zone.

This proposed development is contrary to all the above documents. The fencing of the pitch, with use restricted to paying customers only, will be contrary to LBH Open Space Strategy.

The Ecological Appraisal is sadly lacking in detail. The site visit took place 21st October 2010, the time of day, weather conditions, visibility and amount of time spent on the site is not noted. The majority of the information appears to be taken from desk top studies. Listed below is the information that should have been included in this report.

Birds

The Pinn Corridor supports Kingfishers, [which require 3-5 Km of unrestricted river for foraging]. As there are Kingfishers it must follow that the Pinn supports fish, any pollution of the river however small can upset this delicate balance. There are also Swifts, Barn Owls, Egrets and Green Woodpeckers, all of which are classed as endangered species.

Site of Importance for Nature Conservation

The report failed to identify two Sites of Importance for Nature Conservation [SINCS} in the immediate area. One of these sites supports a colony of Great Crested Newts. Protected species. Both Sincs support Badger Colonies. Protected species. Stag Beetles and Humming Bird Hawk

Moths have also been recorded in the area. Protected species.

Bats

The Pinn Meadows are important sites for Bats. During the summer months 2011, organised Bat Walks took place, at Long Meadow Eastcote and Kings College Playing Fields. These walks were led by LBH Officers, Eastcote Conservation Panel and the Friends of Pinn Meadows. Over 130 members of the general public attended these walks. Three types of Bat were identified, Common Pipistrelle, Noctule and Serotine. Protected Species.

It must be obvious that an extensive concrete, fenced and Floodlit area will inevitably be catastrophic to this wild life habitat. There will be added light pollution, from 8, 15m high flood lights. There is already a high degree of light pollution on the existing Astroturf pitch, this has not been taken into consideration in any of the reports submitted with the application. Noise levels will rise, there will be increased use and disturbance, from both humans and vehicles.

Surrounding Trees

The tree line surrounding the meadow is very important to bird and insect life. This report states that no trees would need to be cut back or removed. That should be disputed, the proposed pitch and surrounding pathway will interfere with the roots of the mature trees and the over hanging branches will cause a problem with leaves on the pitch. Making applications for removal or severe pruning a foregone conclusion. A full tree report has not been submitted this should be requested and submitted before determination takes place.

The above information shows the Ecology Appraisal to be totally lacking in substance, therefore, any observations or recommendations should be discounted. The proposed development contravenes all the aforementioned guidelines.

Changes made to Kings College Playing Fields will adversely affect the Eastcote Meadows namely Long Meadow and Cheyne Fields.

Loss of Public Amenity

Kings College Playing were Fields were given for the unrestricted use the people of the area, this should be respected and further restriction on these fields prohibited. The D&AS refers to the use for Field Sports, Have not Fox Hunting, Badger Baiting and Hare Coursing been banned?

The siting of this fenced pitch will severely curtail use of the Public Footpath and the Celandine Route. The Celandine Route is an important feature of the Green Grid Plan. The narrow area left between the proposed pitch and the scrub on the river bank will become impassable in wet weather. The Celandine Route also links the two important historic sites in the area, Eastcote House Gardens and Manor Farm, both Grade II listed sites. The Celandine Route is used by local residents of Eastcote and Ruislip, also Walking Groups from Pinner, Harrow use the route regularly. The Pinner Historic Walk Group part of Walk Your Way to Health in Harrow have given a petition of 42 signatures, to the Friends of Eastcote House Gardens to support the resistance to this current application

Currently, the LBH is making a bid to the Heritage Lottery Fund to restore the buildings at Eastcote House Gardens, part of the plans is a greater use of the area by local schools, the Celandine Route being part of the overall educational value of the project. Disruption of the Celandine Route and the destruction of the river corridor will severely curtail these vital elements of the HLF bid.

Flood Risk

These meadows are flood plain, severe flooding is usual all along the Pinn flood plain. To install an area of concrete 101.50m x 66m with an extra concrete path will remove natural land drainage adding to the flood risk. A SUDS has not been designed into this project. It is stated that the spoil

from the development will be spread onto the meadows. This is not acceptable, the resulting bund will disrupt the natural water flow and cause flooding possibly to residents gardens.

Traffic Congestion

There is no traffic survey with this application. Congestion in Kings College Road and the surrounding roads is already at an unacceptable level. Yet it is claimed that this extra facility will not add to the chaos. Cycle parking is not provided. A traffic survey and travel plan should be sought and received before determination of the application. The Design & Access Statement refers to vehicular gates for access for tractors and Emergency Services. There is no indication on the drawings as to where these gates will be situated, nor is there information regarding turning circles etc for these large vehicles. Drawings and diagrams explaining these statements should be sought and received before determination.

Accessibility

The pathway leading from Kings College Road, around the proposed pitch to the club house, is, according to the D&AS, for the use of wheelchair users. Gradients of this path are not given. Means of access to the club house is not shown nor is there any indication that the club house has accessible facilities for disabled people. Clarification of these matters should be sought and received before the application is determined.

Public safety

The 101.5m length of fencing alongside a very narrow footpath will reduce the openness of the meadows. This will give a perception of being enclosed in a tunnel, and the impaired view will give rise to feelings of unease. Thus making the area unavailable to walkers. The proposed footpath area also lacks visibility. A Secure by Design report should be obtained.

Conclusion

This proposal is totally unacceptable, the reports submitted are of poor quality and should not be relied upon. We would ask that careful scrutiny of the actual position of the proposed pitch as marked on the drawings is correct. The proposal is contrary to the London Plan, Hillingdon Open Space Strategy, Hillingdon Landscape Character Assessment [Draft] and the Mayor of London's Green Grid Plan [Draft]. It is doubtful if SPD Accessible Hillingdon and Secure by Design have been followed.

We ask that this application be refused.

RUISLIP VILLAGE CONSERVATION PANEL

The site of the proposed additional floodlit hockey pitch adjoins the Ruislip Conservation Area and I write as Chairman of the Ruislip Village Conservation Panel to register the strongest possible objection to this attempt to further vandalise a revered public facility. A public facility given to the people of Ruislip for their free use and law-abiding recreation, a facility enjoyed by generations of local residents over the years. This proposal will impact considerably on the Ruislip Conservation Area as the River Pinn, the Celandine Walk and Pinn Meadows are a continuous and interdependent link, ecologically, biologically and environmentally. The enjoyment of the countryside, the flora and fauna, peace and quiet in an increasingly commercialised world and the right to walk unhindered through the fields and along the riverside, were the intentions of our original benefactors. That facility is needed more in our present day than even they might have foreseen.

Already a sizeable piece of these public fields has been granted to the private hockey club for their first fenced-in pitch, for their exclusive use to the detriment of local residents. However the invasive and disturbing effects of the existing installation extend way beyond the footprint of the pitch. In its misguided wisdom the Council granted addition permission to that private club to display intrusive

and anti-social floodlighting which has caused considerable distress to surrounding residents. The enclosure of this land and the erection of the ugly floodlighting masts and powerful lights are totally contrary to the intentions of Kings College, Cambridge. In addition it has been revealed that this Club has been further sub-letting its existing area to a local football club. The existing floodlit pitch is not even confined to the use of local sportsmen for we have been told that a large proportion of the club membership comes from across the Borough and some don't even live in Hillingdon at all.

And now the Eastcote Hockey Club wants to double its exclusive area to cater for even more activities for its members. It is no excuse to say that the pitch is not used all the time, that the lights are turned off. Consider what is left in the middle of these beautiful green and hitherto pleasant fields, a vast, soulless, locked up metal cage surrounded with unsightly steel masts. Now they want another one.

Since the construction of an all-weather floodlit pitch does not require grassland in any way; does not require pleasant views around it; but certainly does require even more parking and the inevitable traffic chaos, why can't any further pitch be built on a brownfield site where all these facilities can be provided with little or no disruption and intrusion to hundreds of local people in a residential area.

A detailed assessment of the Mayor of London's and Hillingdon Council's own rules and guidelines on Planning and Open Spaces is well covered in the Eastcote CAAP objection submission together with the effects upon wildlife and trees, with all of which we totally agree. If our local council cares one iota about the vast number of council-tax paying residents from Ruislip and all the surrounding areas that it purports to represent, it will throw out this attempt at the further desecration of our free and unencumbered public open space.

FRIENDS OF PINN MEADOWS

I am writing on behalf of the Friends of Pinn Meadows to formally oppose the proposals for the above development. The Friends of Pinn Meadows (FoPM) is a group of local Ruislip and Eastcote residents formed following the submission of a previous proposal by Eastcote Hockey Club to build a similar development enclosing public open space for its own use. FoPM has raised a petition against this development proposal with, at the time of writing, over 4,400 signatures. The petition, which will be presented to the Planning Committee which is to determine the application is in the following words:

We the undersigned object to Eastcote Hockey Club's plans to fence off another area of Kings College Playing fields. These are public playing fields for the benefit of the whole 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 and light pollution as well as loss of a valuable public amenity. We are opposed to the proposed development primarily on the grounds of loss of amenity which would affect the large number of local people who currently use Kings College Playing Fields for a variety of recreational purposes. This letter now sets out in detail our reasons for objecting to the development:

Local Plan Policy

As identified in the London Borough of Hillingdon Unitary Development Plan the areas of land which run through the Borough associated with the River Pinn are designated Green Chains which, linked together, form an essential relief from the urban nature of the Borough. The proposed location for the development is on land designated Green Chain.

The following Policy applies: OL11 IN RESPECT OF GREEN CHAINS, THE LOCAL PLANNING AUTHORITY WILL:

(i) ENCOURAGE THE PROVISION AND IMPROVEMENT OF SUITABLE RECREATIONAL FACILITIES;

The introduction of an enclosed all-weather hockey facility may well be a recreational facility but is far from suitable in this location. A suitable recreation facility is one such as is current. Grass football pitches with no enclosures offer amenity to the whole community as opposed to a small number of individuals. LBH should be protecting the current use under this policy as it caters better for the majority of users.

(ii) MAINTAIN THEIR POSITIVE CONTRIBUTION IN PROVIDING A VISUAL AND PHYSICAL BREAK IN THE BUILT-UP AREA;

The introduction of a Steel weld mesh enclosure of between 3m and 4.5m height along with 15m high floodlighting does not maintain the visual and physical break. It introduces further visual interference which would detract greatly from the area.

(iii) CONSERVE AND ENHANCE THE VISUAL AMENITY AND NATURE CONSERVATION VALUE OF THE LANDSCAPE;

As identified above this proposal is in direct contravention of this policy. The proposal neither conserves nor enhances the visual amenity of the landscape but would have the exactly opposite effect.

(iv) SEEK TO IMPROVE PUBLIC ACCESS TO AND THROUGH THE AREA;

Due to the enclosure of the proposed facility public access to and through the area will be greatly restricted. 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.

(v) PROMOTE AN OVERALL IDENTITY FOR GREEN CHAINS THROUGHOUT THE BOROUGH

A development of this nature will set a worrying precedent for the Green Chains which are constantly under the threat of development. How will later applications for further enclosure, surfacing and exclusion of public use and access be prevented if this proposal is permitted to proceed and is then able to be quoted as a precedent? This application is clearly contrary to the above Green Chain Policies and should therefore be rejected.

Trails & Rights of Way Policy

Approval of the Application would also contravene the Council's stated policy on Trails and Rights of Way. The proposed new all-weather pitch would be sited on the twelve mile Celandine Route from Pinner to Cowley, creating just east of King's College Road an ugly, narrow alleyway between the new and existing pitches, leading to diminished use and enjoyment by the public.

In its response to the Government's recent HS2 Consultation, Hillingdon Council lists the Celandine Route among the Public Rights of Way and trails that would be affected by that scheme. The statement, which presumably would also apply to the present application, continues:

These trails are well used and valued by the local communities and those in adjoining areas. Some of these also provide necessary routes linking the north and south of the borough and it is crucial that they are not severed. It is also important that the attractiveness of these routes is maintained to ensure that they continue to be well utilised and valued by the public in the long term.

Application Form

There are several serious inaccuracies in the application form:

· Section 14 Biodiversity and Geological Conservation

We consider that the answer to question a) concerning whether there is a reasonable likelihood of protected and priority species being adversely affected within the application site or on land adjacent to or near the application site should have been Yes.

We also consider that the response to question b) concerning whether there is a reasonable likelihood of Designated sites, important habitats or other biodiversity features being adversely affected should have been Yes.

· Section 15 Existing Use

This states: Designated Playing Fields - previously grass hockey pitches - presently used as grass football pitches. We question the use of the word Designated. While individual pitches have been leased and used for these purposes for many years this term is not understood. Such use has not been exclusive but is subject to public access.

The Existing Use answer on the form should therefore include: and public open space.

· Section 16 Trees and Hedges

The application form has been completed to indicate that:

i) There are no trees or hedges on the proposed development site

However, this is incorrect as the Ecological Appraisal submitted by the applicants admits that there is an area of broadleaved woodland in the northwest corner of the proposed pitch.

ii) There are no trees or hedges on land adjacent to the proposed site that might be important as part of the local landscape character.

Again, this is inaccurate. The Ecological Appraisal identifies a tree line of mature and veteran oaks just outside the northwest corner of the pitch site. The canopy of two of the oaks actually overhangs the northwest corner of the site. The line of oak trees is a significant feature in the landscape and, if these trees had been located in private gardens, they would long since have been protected by Tree Preservation Orders.

Before adding our objections to the application in detail we would draw attention to the need to accurately plot on-site the exact position of the proposed pitch, to enable its impact on footpath, trees and the remaining football pitches to be fully assessed.

Visual Impact

There is no visual impact assessment submitted as part of the proposals. Bearing in mind the prominence and location of the proposed development we would have expected the applicant to have provided such an assessment. The only indication given by the applicant in their submission of the possible visual impact of the proposed development is a series of four photographs. The first is aerial photograph showing the proposed site superimposed on the photograph. The others are computer generated images purporting to show what the site would look like from North (Photo 2), East (Photo 3) and West (Photo 4). We consider these views very misleading as they are all assumed to be at right angles to the line of mesh fencing while the scale of the fencing (fence heights) cannot be ascertained against any feature such as a person walking beside the fencing.

We attach to this letter photographs to show what the existing fenced all weather pitch looks like. It will be observed that when viewed from an angle the close mesh fencing merges together to appear to form a solid mass, obstructing views through the fencing to the fields beyond. Some of our photographs also include local residents to demonstrate the large scale of the proposed perimeter fencing.

We also note that there is no illustration showing the impact of the blue surround of the pitch that is referenced in the application form under section 10 Materials.

Opposition Statement

The Friends of Pinn Meadows have produced an Opposition Statement that is a response to the Supporting Statement which has been submitted in support of the planning application. This statement is attached as Appendix A.

Traffic Impact Study

The Friends of Pinn Meadows have considered the Traffic Impact Study submitted in support of the application. We consider that this study is not fit for purpose and is lacking in detail and evidence to support many of the assertions made in the Study. Traffic congestion along Kings College Road

due to on-street parking has become a major problem in the last few years, yet the applicant's Traffic Impact Study seems to be in denial about the car parking problem. Our detailed comments on the Traffic Impact Study are contained in the attached Appendix B.

Ecological Appraisal

We consider that the Ecological Appraisal submitted in support of the application lacks rigour, and that the authors have not sufficiently thoroughly investigated the extent of wildlife to be found in the area or adequately considered the adverse impacts on wildlife of the proposed development. Our detailed comments on the Ecological Appraisal are contained in the attached Appendix C.

Flood Risk Assessment

Residents have very serious concerns that this development proposal in Flood Zone 3 of the floodplain might adversely affect flood risk to homes in the area. There are many homes within the immediate vicinity of Kings College Playing Fields which are in Flood Zone 3 (with a high risk of flooding at or above a frequency of 1 in 100 years). The Flood Risk is not merely theoretical. Many properties have been flooded previously following heavy storms in August 1977. More recently some homes adjacent to the Pinn Meadows were flooded in March 2002. We have photographs of some of the areas which were flooded in 2002 which are attached for your information. We have considered the FRA submitted in support of the application and consider that a substantial amount of additional information should be obtained before any judgement can be made on whether the proposed development would have any adverse effect on flood storage capacity, flooding flows or additional flooding risk to the many residential properties which surround Kings College Playing Fields. Our comments and suggested areas for seeking further clarification and information from the applicant are set out in the attached Appendix D.

Floodlighting

We do not consider the Floodlighting Report submitted in support of the application adequately considers the effects of the proposed floodlights. It does not include lighting grids beyond the boundary of the site or at the homes of residents nearest to the site. No consideration has been given to providing a lower level of lighting sufficient for Club matches. The impact of lighting on the road has also not been addressed. There is a considerable amount of additional information which should be sought from the applicant before the full implications of the proposed floodlighting could be assessed. The Friends of Pinn Meadows has obtained a Floodlighting Report which identifies the need for more detailed information to be provided. This Report is attached as Appendix E.

Noise Assessment

The Friends of Pinn Meadows has obtained advice challenging the methodology and conclusions of the Noise Assessment submitted in support of the planning application. Our observations and objections are attached as Appendix F.

Demand and Need

In submitting an application for a proposal such as this which will be sited in Green Chain, impacting visually upon the amenity space, reducing considerably the amount of amenity space available to the public and enclosing for private use an area of land currently accessible to all, we would expect to have seen some form of demand analysis to accompany the application. This demand analysis would need to demonstrate the requirement.

The Friends of Pinn Meadows have reviewed use by the Hockey Club of their own pitch and hire of other pitches for Home games (At Brunel University and Harefield Academy). We have also researched the availability of all weather pitches and have reviewed the impact of the loss of one grass football pitch and the loss of other areas of playing field space on Ruislip Rangers Youth FC. Our own assessment of Demand and Need is attached as Appendix G.

Summary of Additional Supporting Information Required

We have summarised the additional information we consider should be required from the applicant to support their application and enable this planning application to be determined and this is listed on the attached Appendix H.

Conclusion

The Friends of Pinn Meadows object to this application on the following principal grounds that:

- the proposed development is in direct conflict with LBH planning Policy on Green Chains and with the Council's stated policy on Trails & Rights of Way
- the proposed development would, if completed, represent a hugely adverse visual impact (which has not been properly represented from the retained sections of the amenity space)
- the proposed development would remove from free public use an area of 6,720 sq m - turning natural grassed fields into a plastic coated, fenced off area to be used by a select few.
- the applicant has no proven need of the additional all-weather pitch and there is no demonstrable public demand either now or in the future, rather the application simply reflects a desire by the management of the Hockey Club to expand its facilities for its own convenience at the expense of all other users in the community.
- the Traffic Impact Study appended to the Application is too narrow in scope, lacking in detail, with the principal assertions completely devoid of substantiation, while it provides inadequate reliable information to enable the planning authority to accept the proposals on the grounds of the traffic impact, and the possibility - we would say inevitability - of increased parking problems is barely addressed.
- the Ecological Appraisal appended to the Application lacks the rigour which it is reasonable to expect from a proper assessment of such a potentially sensitive site - rigorous, thoroughly researched report needs to be commissioned from independent, scientifically qualified experts before determination of the Application takes place.
- it would not be possible to make a definitive environmental impact assessment based solely on the floodlighting information appended to the application - it is clear that designers need to be asked by those submitting the application to provide proper detail on the potential effects of light pollution on the area.
- the environmental impact of noise from any new all-weather pitch erected on the site is not adequately reflected in the applicant's expert report, where the accuracy is called into question by incorrect choice of reference points and flawed assumptions as to the additional volume likely to be experienced by residents at those points.
- the Flood Risk Assessment that accompanies the application fails to adequately address a number of critical concerns about the immediate and longer term impact of the proposed development on the River Pinn flood plain and the extent to which the danger of flooding would be increased for properties adjacent to and upstream of the site, questions concerning permeability of materials and of degradation through use are not answered.
- the proposed development is overwhelmingly opposed by the local community as evidenced by the size of our petition, people who currently walk, exercise their dogs, play football or simply find some space away from the hubbub of daily life.

We trust you will find this letter and appendices relevant and constructive in determining and, hopefully, rejecting the present application. My colleagues and I are, of course, ready to assist the Council by clarifying any points made in this letter, any of the supporting documents, or any other relevant matter.

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.

Local authority biodiversity duty and opportunities for enhancement.

Under section 40(1) of the Natural Environment & Rural Communities Act 2006 a duty is placed on public authorities, including local planning authorities, to have regard to biodiversity in exercising their functions. This duty covers the protection, enhancement and restoration of habitats and species.

Planning Policy Statement 9: Biodiversity & Geological Conservation also expects local authorities to prevent harm to biodiversity and geological interests. Part (vi) of the Key Principles makes it clear how the government expects the council to consider planning decisions that could lead to harm to biodiversity and geological interests. Section 10 on ancient woodland and section 12 on networks of natural habitats describe how these particular biodiversity features should be protected from development.

The ecological survey submitted with this application has identified that there will not be any significant impacts on statutorily protected sites, species or on priority Biodiversity Action Plan (BAP) habitats as a result of this proposal. We would advise that the recommendations given in the ecological appraisal with regards to the lighting of the site be followed to avoid any adverse impacts on bats. However, when considering this application the council should maximise opportunities in and around the development for building in beneficial features as part of good design in accordance with the duty on the council described above and in paragraph 14 of PPS 9. The Town and Country Planning Association's publication 'Biodiversity By Design' provides further information on this issue and the publication can be downloaded from <http://www.tcpa.org.uk/pages/biodiversity-by-design.html>

Examples of biodiversity enhancements that can be widely incorporated into development proposals include:

Green/brown roofs.

The use of alternative roofing (turf, aggregate, brown and green roofs) can make a significant contribution to biodiversity, attenuation of rainfall, and energy efficiency as they can provide a high degree of insulation.

Landscaping.

Native species of plant should be used in landscaping proposals associated with development, unless

there are over-riding reasons why particular non-native species need to be used. The nature conservation value of trees, shrubs and other plants includes their intrinsic place in the ecosystem; their direct role as food or shelter for species; and in the case of trees and shrubs, their influence through the creation of woodland conditions that are required by other species, eg the ground flora.

Nesting and roosting sites.

Modern buildings tend to reduce the amount of potential nesting and roosting sites. Artificial sites may therefore need to be provided for bats and birds. There is a range of ways in which these can be incorporated into buildings, or built in courtyard habitats. Their location should provide protection from the elements, preferably facing an easterly direction, out of the direct heat of the sun and prevailing wind and rain.

Sustainable urban drainage system (SUDS).

Many existing urban drainage systems are damaging the environment and are not, therefore, sustainable in the long term. Techniques to reduce these effects have been developed and are collectively referred to as Sustainable Urban Drainage Systems (SUDS). SUDS are physical structures built to receive surface water runoff. They typically include ponds, wetland, swales and porous surfaces. They should be located as close as possible to where the rainwater falls,

providing attenuation for the runoff. They may also provide treatment for water prior to discharge, using the natural processes of sedimentation, filtration, adsorption and biological degradation.

HERTS AND MIDDLESEX WILDLIFE TRUST

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.

The applicant has submitted an Ecological Appraisal, produced by EcoConsult Wildlife Consultancy (November 2010). The report indicates appropriate methodologies have been followed to assess potential impacts on important habitats and protected or priority species. Suitable mitigation has also been proposed.

Given the proximity of the new sports pitch to the River Pinn an important wildlife corridor it is appropriate to seek assurances that the scheme has been designed to minimise and mitigate as far as possible any negative impacts on the surrounding habitats and ecology. Notably, the flood lighting used should not adversely impact on the river, its margins and mature lines of trees along its course. EcoConsult have made fitting recommendations in this regard, in line with Bat Conservation Trust guidance on lighting and impact on bats.

BCT guidance suggests:

- The light columns should be as short as possible
- Asymmetric beam floodlights should be used, orientated so the glass is parallel to the ground, to avoid horizontal light spill
- Luminaire accessories, such as hoods, shields and louvers should be used to prevent unnecessary spill of light and direct it to where it is needed
- Restrictions should be placed on the times when lighting is used, to ensure periods of darkness

Lighting used for other purposes, such as for pedestrian walkways, should similarly be designed to minimise impact:

- Use low or high pressure sodium lighting rather than mercury or metal halide, as the narrower range of wavelengths emitted is less disruptive or harmful to wildlife
- The minimum quantity and intensity of lighting required for safety and security reasons should be used
- Light should be directed to where it is needed
- Fix luminaire accessories to prevent light spill onto other areas
- Timers and motion sensors should be employed where appropriate

Artificial lighting can impact on nocturnal species such as bats in several ways. Lighting may impact on the availability of insects on which they forage, by drawing insects to certain areas whilst simultaneously repelling some bat species. Lighting exposes species to increased risk of predation. Lighting can also act as a barrier, severing flight lines and fragmenting habitats. This is a particular issue in this instance, as river corridors are important for ecological connectivity and wildlife movement, which may be fragmented through artificial illumination at night.

Recommendation

In order to maintain the value of the adjacent habitats for wildlife and the functionality of the river as an ecological corridor, please consider incorporating the following Conditions, or similar, with any permission granted:

LIGHTING: No external lighting shall be installed on the development site unless the LPA has first approved in writing details of position, height, design and intensity, as appropriate to minimise impact on wildlife and ecological connectivity. Any lighting that needs to be installed should be downward facing and directed away from any sensitive areas, including the River Pinn, mature and semi-mature tree, shrub and hedge lines, bat flight paths, potential bat roost sites and any installed artificial roosts. The design of the lighting scheme should follow the recommendations given in the Bat Conservation Trust's advice note on bats and lighting in the UK (BCT, 2008).

REASON: The habitats around the site is important for ecological connectivity an may be important for bats and other species which are adversely affected by light pollution in sensitive areas.

BAP Legislation and Policy

Rivers are a UK Biodiversity Action Plan (BAP) habitat, and as such require due consideration as outlined in Paragraphs 84 and 85 of ODPM Circular 06/2005 to PPS9, the CROW Act (2000) (section 74) and the NERC Biodiversity Duty. All species of bats present in the UK are listed among the BAP priority species, so require the same consideration.

Planning Policy Statement 9 (PPS9) (August 2005) contains important protections for biodiversity in general and for UK BAP habitats and species in particular:

1. Key Principle ii) states, Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests.
2. The alternative sites principle favours the locating of any development which stands to compromise biodiversity at alternative sites resulting in no or less harm
3. Planning authorities are furthermore obliged to refuse permission where significant harm to biodiversity conservation interests cannot be prevented, adequately mitigated against, or compensated for.
4. Local authorities should conserve habitats of principle importance as identified in section 74 of the CROW Act 2000 (ie. BAP habitats) and identify opportunities to enhance them.
5. Local planning authorities should maximise opportunities to build in beneficial biodiversity features in and around developments.

PPS9 also states, "Local Nature Reserves and Local Sites have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well-being of the community; and in supporting research and education".

Article 10 of the EU Habitats Directive (transposed into UK law in regulation 37 of the Habitats Regulations 2010) says, Member states shall endeavour, where they consider it necessary, in their land use planning and development policies, and in particular, with a view to improving the ecological coherence of the Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild flora and Fauna: ..Local Sites systems and ancient hedgerows contribute to fulfilling this requirement and can play a very important part in maintaining the links that join up and support the nationally and internationally recognised sites.

Paragraph 84 of ODPM Circular 06/2005 to PPS9 states, 'The potential effects of a development, on habitats or species listed as priorities in the UK Biodiversity Action Plan (BAP) and by Local Biodiversity Partnerships, together with policies in the England Biodiversity Strategy are capable of being a material consideration in the preparation of regional spatial strategies and local development documents and the making of planning decisions.'

Paragraph 85 highlights the duties to conserve biodiversity conferred by Section 74 of the Countryside and Rights of Way Act 2000 and PPS9, for local authorities 'to promote the taking of steps by others to further the conservation of the habitat types and species of principle importance

for biodiversity' (ie. BAP habitats and species), including through their planning function.

NORTHWOOD HILLS RESIDENTS ASSOCIATION

We write in support of our colleagues, the Ruislip Residents Association, Friends of Pinn Meadows, Ruislip Village Conservation Area Advisory Panel and local residents.

There is already an existing pitch on the site and I can't see why the football and hockey clubs cannot share that existing site.

There is no provision made for extra parking. If they expect the football teams as well as the hockey teams to be using the pitches simultaneously, there is obviously going to be an increase of cars and just on that issue the proposal shouldn't go ahead.

Not to mention the environmental case excellently made by my colleague Mrs Lesley Crowcroft. Her report details comprehensively the effect it would have on the environment and the wild life as a result of this proposal.

Considering all the environmental reasons and the lack of suitable parking and the fact that the only valid reason for needing the extra pitch is lack of flood lighting, the only conclusion the Planning Department could come to is to reject this application as there is no case for this additional pitch.

NICK HURD MP

I have been contacted by many constituents about their concerns over the above application by the Eastcote Hockey Club to install a second all weather hockey pitch with associated fencing and floodlighting.

Objections have been voiced to me covering a variety of areas, including the use by a private club to utilise property that was originally covenanted to the people of Ruislip for recreational use by everyone, flooding from the River Pinn, light pollution and the increased amount of traffic congestion.

There is also concern on the nature front as there is a colony of Great Crested Newts on the site, together with badgers, both of which are protected species. Many birds use the River Pinn, some of which are also classed as endangered species along with 3 types of bats. I therefore wish to register my objection to this application.

WARD COUNCILLOR

I am aware of two petitions that have been forwarded to the Council from local residents who are objecting to the above planning application. I have also received copies of several email's to the Council also from local residents who are objecting to this planning application.

There are a considerable number of people who are opposed to the erection of a second Astro Turf Hockey pitch on this site and are asking the Council to refuse it. I hope that when the members of the North Planning Committee consider this planning application they will refuse it for the many reasons that have been given by the objectors.

RAMBLERS ASSOCIATION: No response.

METROPOLITAN POLICE CRIME PREVENTION ADVISER

The fence is clearly see-through (except at particularly 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 assess 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.

Internal Consultees

POLICY AND ENVIRONMENTAL PLANNING (PEP)

London Plan July 2011

Policy 2.18 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.

3. Main Policy Issues

Green Chain

Policy OL11 identifies the functions of green chain which include encouraging the provision and improvement of recreational facilities, conserving and enhancing the visual amenity and nature conservation values of the green chain and maintaining the physical break in the built up area.

The proposal is consistent with the aims of Policy OL11 to encourage the provision and improvement of recreational facilities in this area. The location of the facility within the site, the relative and comparable scale of the proposed development and the existing planting and landscaping will maintain role of green chain in forming a physical and visual break within the urban (built-up) area. These features will further mitigate any adverse effects on the visual and nature conservation of this area. The proposed all-weather pitch will not restrict public access along the majority of the Green Chain and may encourage further use of this area. The proposal is consistent with the intent of Policy OL11 of the UDP Saved Policies, September 2007 and Policy 2.18 of the London Plan 2011.

Secondary Hillingdon Policies

Parking

There are established Council Car Parks within 200m of the proposed facility which could contribute to any parking required by users of the facility. Whilst it could be argued that the proposed hockey pitch is an expansion of existing sports activities on the subject site, 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. The application is accomplished by a flood risk assessment (FRA) and consultation has undertaken with the Environment Agency. The FRA concludes that the relative scale of the proposal and incorporation of mitigation measures are adequate to restrict any significant increase in surface water run off or restriction in flood plain capacity. Furthermore, given the nature of this recreational facility, any public health risk as a result of the location in the flood plain is minimal.

Conclusion

LDF Team has no 'in principle' objection to the development of the proposed all-weather multi purpose pitch in this location.

ACCESS OFFICER

Having evaluated the plans in light of the Council's Supplementary Planning Document, Accessible Hillingdon, the lack of detail pertaining to accessibility is acceptable given that the proposal is for a multi purpose sports playing pitch, floodlighting and fencing.

However, it is suggested that the informative detailed below is attached to any grant of planning permission.

Attached to any grant of planning permission, should be a condition to ensure that the pedestrian pathway, that would link the existing clubhouse with the proposed new pitch and Kings College Road pavement, is designed in accordance with BS 8300:2009.

Informative:

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a protected characteristic, which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

Conclusion: acceptable.

SUSTAINABILITY OFFICER

Flood Risk

I have no objections to the proposed development.

Ecology

Concerns have been raised regarding the potential impacts on protected species. The current use and management of the site as a playing pitch reduces the likely harm on protected species.

The existing playing pitch is unlikely to provide suitable shelter or habitat for hibernating animals and there is sufficient similar type open spaces in the surrounding area to mitigate the loss of this playing pitch.

I therefore agree with the findings of Natural England and do not raise any objections.

ENVIRONMENTAL PROTECTION UNIT (EPU)

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

Lighting

I have reviewed the floodlighting specification undertaken by Highlights Floodlighting Ltd dated 3rd November 2010. In the absence of an SPD 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.

Proposed lighting specification

The proposed luminaires are set out in the document entitled 'Eastcote Hockey Club Project' undertaken by Highlights Floodlighting Ltd dated 3rd November 2010. These are Philips OptiVision MVP507, 24 medium beam (MB/60) and 4 narrow beam (NB/60).

It can be seen that 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.

Since different sporting activities require different light levels on the playing surface, sports such as hockey which have a fast moving ball require a much higher level of illumination than for example netball. Typically, the higher the level at which a sport is played the higher the level of illumination required. Training or more informal use may be undertaken with a lower level of illumination. It is for this reason that I understand that the 2 switching modes are desirable in this location.

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 section 5.2 of the lighting design project prepared for the applicant by Highlights Floodlighting Ltd confirms the luminaire positioning and orientation to not exceed the recommended 70 degree limit from the downward vertical. The proposed Philips OptiVision Luminaires are noted to be of an asymmetric beam design. As such the proposal is for lighting technology which has moved on considerably from that installed at the existing pitch some 15 years ago.

Quantification of light spill can be indicated using a lighting iso-contour plot such as Highlights Floodlighting Ltd's submitted drawing No. EHC/1 dated 3rd November 2010 which was submitted with the Design and Access Statement by MKMT Associates. This shows an indicative 1 Lux iso-contour for the proposed pitch location and indicates a suitable separation distance from the nearest residential receptors for the proposed use.

To put this in to 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 satisfactory levels of vertical illuminance will be achieved by the proposed floodlighting scheme.

An additional parameter that can be varied in lighting impact assessments is the 'maintenance factor'. The submitted floodlighting design is based on a minimum maintained illumination, at 80% of lighting performance this is known as a maintenance factor of 0.8. This is to account for lamp light output losses with time and maximum dirt build-up on the luminaire. I have considered this issue and the likely effect of a re-calculation of the Lux iso-contours with a maintenance factor of 0.9 (90% of specified performance). I am not of the opinion that this adjustment would significantly affect the 1 Lux iso-contour given the separation distances to the residential boundaries in this instance.

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

Condition 1

The floodlights hereby approved shall be installed and maintained 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 and in accordance with the lighting iso-contours shown in drawing number EHC/1 dated 3rd November 2010 undertaken by Highlights Floodlighting Ltd.

Reason: To protect the amenities of nearby residential properties

Hours of use and automated lighting controls I would support hours of use which are identical to the stated existing pitch use. I would also wish to ensure that suitable lighting controls are conditioned such that the lighting is automatically switched off at the approved curfew time. An automatic control system should be developed which;

- ensures the curfew time will be met
- provides safe egress from the pitch
- gives authorised persons selection of the operating levels

Condition 2

The floodlights shall only be turned on and the pitch used between 0900 hours and 2130 hours on Mondays 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

A noise survey has been carried out for the applicant by Walker Beak Mason and the results are set out in a report reference 3950 dated 18th November 2010.

The criteria against which the noise impacts of proposed recreational and sporting activities shall be assessed are set out in the Council's SPD on Noise. That is to say Section 5 (Table 2) of the SPD states that for daytime noise in respect of the proposed daytime use (between 0700 and 2300) the recommended noise level for outdoor living areas shall be as low as reasonably practicable and <50dB LAeq, with indoor living areas <35dB LAeq. As such, this criteria does not prescribe maximum noise levels for impulse noise sources (Lmax), such as impact sound or from player voices, but sets out an LAeq limit, the equivalent continuous noise level measured over a given time period.

Measurements of noise from sources at the existing hockey pitch have been recorded alongside periods where the pitch was not in use (background noise), both on a Thursday evening with a mixture of men's and women's matches and training sessions. This is representative of noise levels on a typical evening's use.

I have reviewed the workings of the above referenced noise survey report and am satisfied that when corrected for distance and the cumulative nature of the proposal effectively to have two pitches in operation, that the noise levels are within the requirements of Section 5 of the Council's SPD on noise.

It should be noted that in terms of impulse noise sources (player voices and impact sound), the measurements show a projected 4.2dB increase at Position D (adjacent 80 Park Avenue) when measured from the centre of the proposed pitch, which accords with the methodology used throughout the report. To put this in context the minimum perceptible increase that the human ear can determine is

3dB, therefore whilst this is acknowledged as a discernible increase it is my opinion that this is acceptable given the similar noise impacts resulting from the existing grass pitches during daylight hours which are located closer to Position D.

Projections of noise levels at additional residential receptors

Position B (10 metres south of existing hockey pitch adjacent to Evelyn Avenue)

Position B is stated in the acoustic report as 10 metres south of the existing pitch adjacent to properties on Evelyn Avenue. My cross referencing of this position on our GIS map gives a measurement position at the boundary with the rear gardens of Evelyn Avenue. I have measured a distance of 163m from the centre of the proposed pitch to Position B. The calculated average (Leq) level from the new pitch at Position B is $20 \log_{10} (10\text{m}/163\text{m}) = -24 \text{ dB}$, taking 66dB down to 42dB.

We then must add 42dB to 52dB, which requires addition of the anti-log values; anti-log of 4.2 + anti-log of 5.2, $\log, \times 10 = 52.4\text{dB}$. The additional noise impact at Position B is therefore shown to be imperceptible. A similar non-perceptible impact would be calculated at Position C.

1st Floor residences at King's College Pavillion.

These residential properties were initially overlooked as receptors for the purposes of the noise assessment, since they are located in what were 1st floor changing rooms before being granted permission as 2 one-bedroom flats in 2004. I have viewed the floor plans on the planning website and note that there is 1 bedroom and 1 study on the Eastern elevation (which would be deemed as habitable rooms).

I have measured the distance to the centre of the proposed pitch from the facade as 131m, $20 \log_{10} (10\text{m}/131\text{m}) = -22\text{dB}$, taking 66dB down to 44dB. However these dwellings do not have external amenity space and as such the 50dB Leq will not apply. The effect of a partially opened window would reduce the level by at least 10dB, which would comply with the indoor SPD criteria of 35dB Leq. In fact, the proximity of the public highway actually means that the background noiselevels are likely to be in excess of 44dB such that the projected impact on the indoor Leq will be non-perceptible up to the curfew time of 21:30.

Please add the construction informative.

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 indicate the Public Right of Way will be subject for an application (although not mentioned) to lay asp (artificial stone paving) along a section of the footpath to access the development, asp is not considered an environmentally sensitive option for a riverside meadow location.

TREE AND LANDSCAPE OFFICER

Landscape Context:

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 the rear gardens of Park Avenue. The site is designated Metropolitan Open Space, 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 football pitches. Along the western boundary there is a shelter belt of woody vegetation including hedges. One of the key characteristics 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 not protected by Tree Preservation Order because they are managed and maintained by the Council's Green Spaces team. There is also vegetation, including Willow trees and scrub, along the edge of the river corridor.

All of the boundary vegetation provides a sense of containment and shelter which contrasts with the otherwise open flat area of amenity grassland which is intensively managed for recreation. The vegetation can also be said to have landscape value in terms of its visual quality, local nature conservation value and historic associations.

Proposal: The proposal is to install an artificial multi-sport surface, measuring 101.5m x 66m with associated floodlighting and fencing, the footprint of which will mirror the existing all-weather pitches on the open space to the south of the River Pinn.

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.

- No tree survey or arboricultural implications survey has been submitted. An ecological appraisal by Ecoconsult, dated November 2010, states (clause 4.7) that the line of Oak trees will not be directly affected by the proposals. This view is re-iterated in the conclusions and recommendations section, clause 5.4.
- During a site inspection on 19 January 2012 to view the temporary setting out pegs for the pitch, it was evident that the north-west corner of the proposed pitch is well within the canopy/drip-line of at

least one of the Oaks. The juxtaposition of the pitch with the line of trees will necessitate the removal of selected branches in order to construct the pitch and boundary fencing (see Devilfish Design drawing No.EHC-PSP-01). Furthermore, 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.

- While some light pruning may not damage the trees, the fact remains that construction of the pitch and a footpath link to the clubhouse will involve the excavation of soil within the canopy and root protection area of the tree(s) which could be very damaging to the trees. No tree survey or arboricultural implications assessment has been prepared to assess these impacts. Moreover, the issue of conflict with existing trees could be avoided by re-siting the pitch some metres to the east although this may constrain the opportunities to provide replace/re-arrange the grass pitches.

- According to the temporary setting out of the all-weather pitches, access across the fields along the Celandine Walk (between the river and the proposed pitches) will be uninterrupted by the proposed layout.

- The proposed pitch will be fenced to a height of 3 metres, increasing to 4.5 metres for 21 metre lengths behind each goal area. The fencing material specified is plastic-coated welded mesh panels, factory-finished in dark green. This specification (fence type and colour) can be very visually permeable (depending on the precise grade of mesh) in the landscape, except when viewed at the most oblique angles. The only solid fencing will be the low (250mm high) rebound/kick boards around the base of the fencing. It is not considered that the fencing will seriously affect the open character of the amenity space and views across the site.

- Lighting columns and light spillage from the lamps will inevitably have some impact on the day and night-time landscape. The 8No. 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. The design (appearance and colour) of the light fittings should be carefully considered.

- Section 5 of the Design & Access Statement comments on the proposed landscape associated with the proposal. Excavated topsoil will be re-used to fill the natural depressions in the fields to the east. No additional tree planting has been proposed due to the open character of the fields.

Recommendations:

This proposal is unacceptable because, in the absence of a tree survey/arboricultural implications assessment to BS 5837:2005, the applicant has failed to demonstrate that the tree(s) will be unaffected by the development and has not made provision for its/their long-term protection.

HIGHWAY ENGINEER

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.

The applicant has submitted a transportation impact study in support of the proposals. 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 Astro synthetic grass is a multi-sports use surface. It is extensively used by the Eastcote Hockey Club and 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 of the above uses have their own parking demands, which considerably 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. Given the demand considerably exceed capacity and the need for those visiting the facilities to park close to the site, indiscriminate parking takes place near the junctions, pedestrian crossing points and also on the roundabout at the junction of Kings College Road and Park Avenue. Congested parking on both sides of the road affects traffic flow, and highways and pedestrian safety, and causes chaos for drivers wishing to pass each other.

On Saturdays the existing Astro pitch on site holds 5 home matches at 1030, 1200, 1330, 1500, and 1630 hours. In addition 1 match is held at Brunel University and 1 at Harefield Academy. Teams including umpires comprise of 13 to 15 persons, making a total of 26 to 30 persons per match 130-150 persons per day plus any spectators. The proposed second Astro multi purpose sports pitch will effectively double the capacity to 52-60 persons per match 260-300 persons per day plus spectators in addition to the other uses in the vicinity where the parking demand already significantly exceeds the available capacity. The proposals do not include any additional parking provision to cater for existing and future demands. Reference has been to two private car parks at the clubhouse and adjacent to the Astro pitch with an on-site capacity of 30 cars (or 28 stated in section 4.11 of the transportation impact study) and 20 cars respectively, and a public car park of up to 80 cars. It is important to note that apart from the car park at the clubhouse the other two car parks mentioned are public car parks and therefore not reserved for the Hockey Club to use and are already at capacity due to significant parking demand at this location. The applicant has not submitted any parking layouts to verify the number of parking spaces quoted in the submitted document, in particular for the clubhouse car park and the public car park north of the clubhouse. On-site observations show that the capacity of this public car park appears to be in the region of 25-28 spaces, which is 31%-35% of the capacity stated by the applicant. The applicant goes on to make a number of assumptions such as car occupancy, existing and future parking, traffic and parking demands, but has not provided any data to verify the same. The applicant has stated that 61% of all club members live within easy cycling distance of 3 miles and some 18% of the club members live within easy walking distance of half a mile from the site. Again no quantitative data has been provided to substantiate these statements, and the actual travel modal splits for both home and away teams have also not been provided. It is proposed to increase and improve cycle parking facilities within the clubhouse ground by the entrance, but again no details have been provided for these proposals and the actual demand for it. The fact that already there is a significant parking demand, which considerably exceeds the available capacity, clearly suggests that there is heavy reliance on car use.

The applicant has suggested that due to a lack of changing facilities at Brunel and Harefield, teams congregate at Eastcote Hockey Club to travel to Brunel and Harefield. Responses on the public consultation suggest that the use of changing facilities at both Brunel and Harefield are included in the price of pitch rental, and that most users of Eastcote Hockey Club arrive dressed for play. The applicant and the objectors both have not provided any evidence to support their statements. It is understood that changing facilities are available at Brunel and Harefield venues.

As per the transportation impact study, for longer journeys the club uses bus or coach to carry teams to longer distances away games. Likewise it can be assumed that some of the away teams travelling long distances could also choose to use buses or coaches to arrive at Eastcote Hockey Club. No details have been provided on the movements, parking, and manoeuvring of these vehicles, and the increase due to the proposed development, which could double the number of these vehicles as well.

The applicant's assertions that the site is located in a sustainable location from the transportation

viewpoint and traffic generation as a result of the proposed development will be lower than the existing generation from the site are misleading and cannot be relied upon.

In conclusion, the applicant has failed to provide an accurate quantitative and qualitative assessment of the transportation aspects of the proposed development. The submitted information is flawed and not comprehensive, therefore cannot be relied upon. In the absence of information, the proposals are considered to be contrary to the Council's policies AM7, AM9, AM14, and R16 of the UDP.

Reason for Refusal: The application fails to provide an accurate and robust assessment of the transportation impacts of the development, including traffic generation, car parking, coach/bus parking, cycle parking, highway and pedestrian safety, and free flow of traffic, as such the proposals are considered to be contrary to the Council's Policies AM7, AM9, AM14, and R16 of the UDP.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

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.

Saved Policy OL11 identifies the functions of green chain which include encouraging the provision and improvement of recreational facilities, conserving and enhancing the visual amenity and nature conservation values of green chains and maintaining the physical break in the built up area.

It is considered that the proposal is consistent with the aims of Saved Policy OL11, in that it would encourage the provision and improvement of recreational facilities in this area. The location of the facility within the site, the relative scale of the proposed development in relation to the remaining open space and the existing planting and landscaping would maintain role of the green chain in forming a physical and visual break within the urban (built-up) area. 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 therefore considered that the proposal is consistent with the aims of Policy OL11 of the UDP Saved Policies, September 2007 and Policy 2.18 of the London Plan 2011.

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 PPG17 (Sports and Recreation). PPG17: Planning for Open Space, Sport and Recreation states that authorities should be sympathetic to applications to modernise facilities that are required to support and extend the enjoyment of outdoor sport and recreation, including proposals that will improve the quality of the recreational usage that the site affords. The Open Space Typology based on PPG17 would suggest that the site is currently 'Outdoor Sports Facilities', the primary purpose of which is for the participation in outdoor sports, such as pitch sports, tennis, bowls, athletics or countryside and water sports.

London Plan Policy 3.16 requires UDP policies to assess the need for social infrastructure and community facilities in their area.

The proposal should also be considered in the context of Saved UDP Policies R4 and R5, which seek to safeguard existing facilities for sport. 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 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. 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 as 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 consultation 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.

It is noted that the Open Space Strategy 2011-2026 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 to 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 limitation and restriction of this part of the playing fields, the proposal is considered to be justified on the basis that Eastcote and East Ruislip Ward, within which the application site falls, 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 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 is satisfied that the proposed development accords with policy exception E5 to its playing fields policy as the proposed development is for an 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. However, this is conditional on a formal commitment on the part of the applicant (Eastcote Hockey Club) to grant access by Ruislip Rangers JFC to the five grass pitches on the site (3 mini & 2 youth/full). This could be secured by condition, in the event of an approval. Subject to such a condition being imposed, Sport England raises no objection to this application.

It is considered that any adverse impact on the open space has been outweighed by the benefits associated with the new facilities, which are wholly appropriate to a green chain location and should help to improve recreational facilities in this area. It is not considered that the scheme conflicts with the aims of policies R4 and R5, which seek to safeguard existing sports facilities. No objections are therefore raised to the principle of the intensification of use of the playing fields.

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.

7.06 Environmental Impact

The proposal raises a number of environmental issues. Matters relating to flooding, noise and ecology have been assessed in relevant sections of this report. Land contamination and the impact of the floodlights associated with the development are considered in this section.

LAND CONTAMINATION

The land at the existing playing fields and the proposed all weather playing pitch do not have a contaminative use. Neither the Environment Agency or the Council's Environmental Protection Unit have raised land contamination as a determining issue.

FLOODLIGHTING

There is no specific design guidance on lighting. In the absence of an SPD 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.

A floodlighting assessment has been submitted in support of the application. The floodlights are proposed to be 2 switching modes, 500 Lux and 350 Lux. The 4 narrow beam luminaires would always be in use for both modes, with further 8 medium beam luminaires for the 500 Lux operation. The two lighting modes are required, since different sporting activities require different light levels on the playing surface. Sports such as hockey which have a fast moving ball require a much higher level of illumination than for example netball. Training or more informal use may be undertaken with a lower level of illumination.

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. The Environmental Protection Unit notes that the proposed lighting technology is a considerable improvement from that installed at the existing pitch some 15 years ago.

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. 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 any adjustment for the maintenance factor (to take into account lamp light output losses with time and maximum dirt build-up on the luminaire) would not significantly affect the 1 Lux iso-contour given the separation distances to the residential boundaries in this instance.

In order to ensure the continued implementation of the proposed lighting specification, the Council's Environmental Protection Unit recommends conditions to control the installation and subsequent use of the flood lights. Firstly, the floodlights should be installed and maintained in accordance with the submitted specification, the approved Philips OptiVision asymmetrical luminaires should 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 UDP.

7.07 Impact on the character & appearance of the area

Saved Policy BE19 of the UDP attempt to ensure that new development makes a positive contribution to the character and amenity of the area in which it is proposed. Saved Policy BE38 of the UDP requires new development proposals to incorporate appropriate landscaping proposals.

The site is designated part of a Green Chain in the Saved UDP, September 2007. Saved Policy OL11 identifies the functions of green chain which include encouraging the provision and improvement of recreational facilities, conserving and enhancing the visual amenity and nature conservation values of green chains and maintaining the physical break in the built up area. 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.

Many 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.

Whilst it is acknowledged that the all weather sports pitch, with its associated fencing and floodlighting will have an urbanising effect on the existing playing fields, it is not considered the fundamental open character of the area would be affected by the proposal. The fencing material specified is plastic-coated welded mesh panels, factory-finished in dark green. This specification (fence type and colour) can be very visually permeable (depending on the precise grade of mesh) in the landscape, except when viewed at the most oblique angles. The only solid fencing will be the low (250mm high) rebound/kick boards around the base of the fencing. It is not considered that the fencing will seriously affect the open character of the amenity space and views across the site.

It is acknowledged that the lighting columns and light spillage from the lamps will inevitably have some impact on the day and night-time landscape. The 8 columns, four on each side of the pitch are proposed 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. The design (appearance and colour) of the light fittings should be carefully considered.

It is noted that this kind of development is appropriate even in Green belt locations, where control over development is even more rigorous. Indeed, it has been common practice to provide this type of facility on open land such as this. Recent examples within the Borough are at Brunel University playing fields (Green Belt) and Botwell Green Recreation Grounds (public open space).

The fencing is necessary to protect the pitch from damage and vandalism and to protect passers by from wayward balls. The fencing would be permeable in nature and whilst oblique views might appear less permeable, views across the meadow would not be completely obscured by the proposal. The location of the facility within the site, the relative scale of the proposed development in relation to the remaining open space and the existing planting and landscaping around the fields would maintain the role of the green chain in forming a physical and visual break within the urban (built-up) area. It is therefore considered that the proposal is consistent with the aims of Policy OL11 of the UDP Saved Policies, September 2007 and Policy 2.18 of the London Plan 2011.

One of the main concerns raised by local residents is that due to the enclosure of the proposed facility, public access to and through the area will be greatly restricted. 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. 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 Saved Policy OL11 does not define what would constitute a 'suitable' recreational facility. Nevertheless, it is considered that the introduction of a fenced all-weather hockey pitch is an open recreational facility, which is compliant with the aims of London Plan Policy 2.18 and UDP Saved Policy OL11.

Concerns have also been raised that development of this nature will set a worrying precedent for the Green Chains which are constantly under the threat of development. However, each application needs to be determined on the basis of its individual merits.

The limited impact on visual amenity should be balanced against the provision and improvement of recreational facilities in this area. It is considered that any adverse impact on the open space has been outweighed by the benefits associated with the new facilities, which are wholly appropriate to green chain location and should help to improve recreational facilities in this area.

PUBLIC RIGHT OF WAY

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. The location of the proposed all weather pitch has been moved northwards by approximately 1 metre compared with the previously withdrawn scheme. As such, the submitted plans indicate that Public Right of Way will remain uninterrupted by the development.

However, 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 future of the public footpath needs to be taken into consideration. As a result of the development, 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. 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. 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.

It can be inferred from the above that not all of the public currently use the defined public footpath exclusively, but rather meander leisurely across the fields as the fancy takes them. 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. Clearly, this is not a sustainable reason to refuse the application, particularly as measures to upgrade and maintain the footpath to deal with increased footfall have been identified and could be secured by condition or legal agreement, in the event of an approval.

The rights of way Officer also considers that the development will have a detrimental effect on the character of the footpath, as the visual impact of the development will seriously impede the views over the ancient river side meadow. The proposed all weather pitch would be located along a relatively short stretch of the twelve mile Celandine Route from Pinner to Cowley, just before it crosses Kings College Road. Whilst it is considered important that the attractiveness of these routes is maintained, to ensure that they continue to be well utilised and valued by the public in the long term, it is not considered that the proposal would have such a detrimental effect on the visual amenity of the public footpath as to justify refusal on these grounds.

Given the proximity of the development 1-2 metres from the public footpath potential safety concerns have also been raised, as the location of the development would enclosed 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 submitted plans indicate the Public Right of Way will result in artificial stone paving along a section of the footpath to access the development. It is not considered that this is an environmentally sensitive option for a riverside meadow location and alternative surfacing could be secured by condition, in the event of an approval.

7.08 Impact on neighbours

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 issues have been covered in detail in other sections of this report.

It is not considered that any increase in traffic generation would have a detrimental impact on the living conditions of surrounding occupiers, given the distance from the site vehicular access to surrounding properties.

7.09 Living conditions for future occupiers

Not applicable to this application, as the proposal does not include residential development.

7.10 Traffic impact, car/cycle parking, pedestrian safety

The applicant has submitted a transportation impact study in support of the proposals. There have been numerous objections to the proposals on highway grounds, in response to the public consultation, including a detailed critique of the submitted transport study.

The study makes a number of assumptions such as car occupancy, existing and future parking traffic and parking demands, but has not provided any data to verify these. The applicant has stated that 61% of all club members live within easy cycling distance of 3 miles and some 18% of the club members live within easy walking distance of half a mile from the site. Again, no quantitative data has been provided to substantiate these statements. In addition, the actual travel modal splits for both home and away teams have also not been provided. It is proposed to increase and improve cycle parking facilities within the clubhouse ground by the entrance, but no details have been provided for these proposals and the actual demand for it. The site has a PTAL rating of 1a, which demonstrates that it has a low level of public transport accessibility. The fact that there is already a significant parking demand for the existing facilities, which considerably exceeds the available capacity, clearly suggests that there is heavy reliance on use by the private car.

The Highway Engineer notes that although the existing synthetic multi-sports pitch is mainly used by the Eastcote Hockey Club, it is also available for other sports bookings from local youth organisations. The adjacent football pitches/playing fields, the Club House building with badminton facilities and bar, the Ruislip Cricket Club, athletics track, Kings College Pavilion, Kings Cafe which serves food and drinks, all have their own parking demands. These parking demands currently exceed available off street parking facilities, including the 3 Council car parks and club house car park, resulting in significant overspill parking on the highway, during peak demand.

The Transport Impact Study makes reference to two private car parks at the clubhouse and adjacent to the existing Astro pitch, with an on-site capacity of 30 cars and 20 cars respectively, and a public car park of up to 80 cars. However, this public car park appears to be in the region of 25-28 spaces, rather than the 80 spaces quoted. Apart from the car park at the clubhouse, the other two car parks mentioned, plus the other Council car park opposite are public car parks and therefore not reserved for the Hockey Club's exclusive use. The Highway Engineer points out that in any event, these Council car parks are already at capacity, due to significant parking demand at this location.

During peak demand, extensive parking currently takes place on both sides of this section of Kings College Road and on to other nearby roads. The Highway Engineer is particularly concerned that indiscriminate parking takes place near the junctions, pedestrian crossing points and also on the roundabout at the junction of Kings College Road and Park Avenue. In addition congested parking on both sides of the road affects traffic flow, and highway and pedestrian safety, and causes chaos for drivers wishing to pass each other. The Highway Engineer considers that the proposed second multi purpose sports pitch will effectively double the existing capacity to 52-60 persons per match or 260-300 persons per day plus spectators, in addition to the other uses in the vicinity, where the parking demand already significantly exceeds the available capacity. Crucially, the proposals do not include any additional parking provision to cater for existing and future demands.

The Highway engineer notes that a primary argument to support the proposed development is that consolidation of the Eastcote Hockey Club's (EHC) existing fixtures at one venue will remove additional travel on the local network. The applicant has suggested that due to a lack of changing facilities at Brunel and Harefield, teams congregate at Eastcote Hockey Club to travel to Brunel and Harefield. However, this is disputed by local residents, who suggest that the use of changing facilities at both Brunel and Harefield are included in the price of pitch rental and that most users of Hockey Club arrive in their cars dressed for play. The applicant and the objectors both have not provided any evidence to support their statements. However, it is understood that changing facilities are available at

Brunel and Harefield venues.

The transportation impact study states that for longer journeys the club uses bus or coach to carry teams to longer distance away games. Likewise it can be assumed that some of the away teams travelling long distances would also choose to use buses or coaches to arrive at Eastcote Hockey Club. However, no details have been provided on the movements, parking, and manoeuvring of these vehicles, or the increase in the number of coaches due to the proposed development, which the Highway Engineer estimates, could double the number of such vehicles.

The applicant's assertions that the site is located in a sustainable location and traffic generation as a result of the proposed development will be lower than the existing generation from the site considered misleading and cannot be substantiated.

In conclusion, the Highway Engineer considers that the applicant has failed to provide an accurate quantitative and qualitative assessment of the transportation aspects of the proposed development. The submitted information is flawed, is not comprehensive, therefore cannot be relied upon. In the absence of information, the proposals are considered to be contrary to the Council's Saved Policies AM7, AM9, AM14, and R16 of the UDP.

7.11 Urban design, access and security

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 ISSUES

Saved policy OL26 seeks the protection and enhancement of trees, woodland and landscape features.

Saved policy BE38 seeks the retention of topographical and landscape features and the provision of new planting and landscaping associated with development proposals.

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 no tree survey or arboricultural implications survey has been submitted, although the ecological appraisal states that the line of Oak trees will not be directly affected by the proposals. However, during a site visit on 19 January 2012, after the location of pitch was temporarily set out at the request of officers, it became apparent that the north-west corner of the proposed pitch is well within the canopy/drip-line of at least one of the Oaks. The Tree and Landscape Officer advises that the juxtaposition of the pitch with the line of trees will necessitate the removal of selected branches in order to construct the pitch and boundary fencing. Furthermore, the proximity of the pitch to the trees is likely to create a need in the future to reduce additional branches which over-sail the pitch and would drop leaf litter, a requirement that the Council might find unreasonable to resist.

While some light pruning may not fatally damage the trees, the Tree and Landscape Officer notes that that construction of the pitch and a footpath link to the clubhouse will involve excavations within the canopy and root protection area of the trees, to the detriment of their survival and long term protection. No tree survey or arboricultural implications assessment has been prepared to assess these impacts. Moreover, the issue of conflict with existing trees could be avoided by re-siting the pitch some metres to the east, although this may constrain the opportunities to provide replace/re-arrange the grass football pitches.

In light of the above mentioned concerns, in the absence of a tree survey/arboricultural implications assessment to BS 5837:2005, the proposal is considered unacceptable as the applicant has failed to demonstrate that the tree or trees will be unaffected by the development and has not made provision for its/their long-term protection, contrary to Saved Policy BE38 of the UDP.

ECOLOGY

PPS9 outlines the Government's commitment to sustainable development and in particular to conserving the natural heritage of the country for the benefit of this and future generations. 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.

Saved policy EC2 seeks the promotion of nature conservation interests. Policy EC3 of the UDP 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, Policy EC5 of the plan seeks the retention of certain on-site ecological features enhancement of the nature conservation and ecological interest of sites or create new habitats.

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.

An ecological survey has been submitted in support of this application. The survey has identified that there will not be any significant impacts on statutorily protected sites, species or on priority Biodiversity Action Plan (BAP) habitats as a result of this proposal.

Natural England raises no objections to the proposals, subject to the recommendations given in the ecological appraisal with regards to the lighting of the site being implemented, to avoid any adverse impacts on bats. Natural England further advise the Council to seek biodiversity enhancements which could include sustainable urban drainage and native species planting. Since the application is being recommended for refusal, the latter has not been pursued with the applicants.

The Environment Agency raises no objections on ecological grounds, subject to a condition requiring a scheme for the provision and management of a buffer zone alongside the River Pinn. The scheme would require details of the extent and layout of the buffer zone; details of proposed planting of native species, details of protection during development and management/maintenance over the longer term and details of any footpaths, fencing and lighting from the sports playing pitch. Had the development been acceptable in other respects, it is considered that a suitably worded condition could be imposed, in order to protect the ecological value of the river corridor as a habitat and to ensure that any planting or lighting is appropriate and will not have a detrimental impact on the river corridor.

Issues relating to the protection of the ecological value of the river corridor and the impact of the development on bats are also raised by the Herts and Middlesex Wildlife Trust. Notably, the Trust is concerned that the floodlighting used should not adversely impact on the river, its margins and mature lines of trees along its course. The Trust notes that artificial lighting can impact on nocturnal species such as bats in several ways. Lighting may impact on the availability of insects on which they forage, by drawing insects to certain areas whilst simultaneously repelling some bat species. Lighting exposes species to increased risk of predation. Lighting can also act as a barrier, severing flight lines and fragmenting habitats. This is a particular issue in this instance, as river corridors are important for ecological connectivity and wildlife movement, which may be fragmented through artificial illumination at night.

However, the Trust acknowledges that the Ecological Assessment makes fitting recommendations in this regard, in line with Bat Conservation Trust guidance on lighting and impact on bats. This guidance suggests that the light columns should be as short as possible Asymmetric beam floodlights should be used, orientated so the glass is parallel to the ground, to avoid horizontal light spill, Luminaire accessories, such as hoods, shields and louvers should be used to prevent unnecessary spill of light and direct it to where it is needed, restrictions should be placed on the times when lighting is used, to ensure periods of darkness Lighting used for other purposes, such as for pedestrian walkways, should similarly be designed to minimise impact; use low or high pressure sodium lighting rather than mercury or metal halide, as the narrower range of wavelengths emitted is less disruptive or harmful to wildlife; the minimum quantity and intensity of lighting required for safety and security reasons should be used; light should be directed to where it is needed; fix luminaire accessories to prevent light spill onto other areas; Timers and motion sensors should be employed where appropriate.

Clearly, habitats around the site are important for ecological connectivity and may be important for bats and other species which are adversely affected by light pollution in sensitive areas. However, had the development been acceptable in other respects, it is considered that a suitably worded condition could have been imposed, requiring the submission of details of an appropriate lighting scheme, in order to maintain the value of the adjacent habitats for wildlife and the functionality of the river as an ecological corridor.

In conclusion, the current use and management regime of the site as a playing pitch

reduces the likely harm on protected species. The existing playing pitch is unlikely to provide suitable shelter or habitat for hibernating animals and there is sufficient similar type open spaces in the surrounding area to mitigate the loss of this playing pitch. It is considered that the submitted ecological assessment has demonstrated that the proposed development could be completed without detriment to the recognised ecological value of this area and the biodiversity interests of the neighbouring sites. Had the development been acceptable in other respects, the ecological interests of the site and locality would be protected, subject to conditions, in compliance with Policies EC1 and EC3 of the Unitary Development Plan Saved Policies (September 2007), London Plan Policy 7.19 and PPS9 (Biodiversity and Geological Conservation).

7.15 Sustainable waste management

Not applicable to this application.

7.16 Renewable energy / Sustainability

Not applicable to this application.

7.17 Flooding or Drainage Issues

Saved Policies OE7 and OE8 of the UDP seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding. A Flood Risk Assessment has been submitted as part of the application taking into consideration the principles of Planning Policy Statement 25 (PPS25) and other relevant regional and local policies. This assessment has a risk based approach that applies PPS25, and aims to take into account all the information and mitigation techniques available to determine the feasibility of the proposed development.

The Environment Agency's flood map indicates that the application site lies within Flood Zone 3b (functional Flood Plain, annual probability of greater than 5% from rivers). The nearest main river to the site is the River Pinn, which is located at least 8m from the Southern boundary of the site.

The assessment notes that the proposed development is an appropriate land use within Flood Zone 3. Therefore, the Exception Test as set out in PPS 25 is not required.

The proposed development consists of the construction of an all-weather synthetic permeable turf pitch on existing playing fields, with an associated permeable, open-textured macadam run-off strip and appropriate water permeable wire mesh fence and running board. The proposed development incorporates re-levelling of the ground to provide a flat playing field. The overall levels of the pitch will generally be lower than the current ground levels, providing more flood water storage capacity at the site. This should ensure that there is no increase in flood risk at the site or the surrounding areas.

The Surface Water Management Strategy aims to mimic the existing run-off characteristics of the site. As it is Greenfield, the aim is to keep the run-off levels to the current Greenfield rate. The pitch and path are both made of permeable materials. However, due to the poor permeability of the soil, any surface water would only infiltrate very slowly. The construction of the pitch and path incorporates layers of stone and macadam base, all of which have voidal content and are permeable. In the event of a severe storm, the voids of the base would fill with water, providing sufficient attenuation of water to match the existing Greenfield behaviour of the site. In a storm event of a greater severity than the 1 in 100 year storm, excess run-off would flow downhill to the River Pinn, as it currently does. However, in the event of a fluvial flooding event, the pitch is designed to be flooded, and not to impede the flow of flood water, or to unnecessarily impede debris.

The Environment Agency Aquifer Maps indicate that the site may be underlain by a secondary aquifer could be important both for local supplies and in supplying base flow to rivers. Principal Aquifers may also occur beneath Secondary Aquifers. Aquifers should therefore be protected during the construction and post-construction phases. The Flood Risk Assessment notes that this could be achieved by implementing the Environment Agency's Pollution Prevention Guidelines PPG5 and PPG6.

The Environment Agency has responded to this application and confirms that the site is located in Flood Zone 3b. The Agency is satisfied that the proposed outdoor recreation use are will not be at an unacceptable risk of flooding and or increase flood risk elsewhere, provided conditions are placed on any permission granted for this proposal. These conditions are summarised below.

The development shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) demonstrating:

(i) Provision of compensatory flood plain storage for all floods on site up to the 1 in 100 year plus climate change flood standard.

(ii) Limiting the surface water run-off generated by the 1 in 100 year plus climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.

(iii) A scheme for the provision and management of a buffer zone alongside the River Pinn which should include the extent and layout of the buffer zone, details of any proposed planting (which must be of native species, protection during construction, long term management and maintenance and details of any footpaths, fencing and lighting from the sports plating pitch. The reason for imposing this condition is to prevent the increased risk of flooding and to protect the ecological value of the river corridor as a habitat, to ensure that any planting or lighting is appropriate and will not have a detrimental impact on the river corridor; and to provide sufficient access to the River Pinn for any maintenance required.

Finally the Environment Agency would require any walls or fencing constructed within or around the site shall be designed to be permeable to flood water, in order to prevent increasing flood risk off site by ensuring that any walls or fencing do not obstruct the flow or the storage of flood water.

Subject to the recommended conditions, it is considered that development would not increase the risk of flooding, the water quality will be preserved and protected and the statutory functions of the Environment Agency will not be compromised, in accordance with Policies OE7 and OE8 of the Hillingdon Unitary Development Plan Saved Policies 2007, Policy 5.12 of The London Plan (2011) and Planning Policy Statement 25: Development and Flood Risk.

7.18 Noise or Air Quality Issues

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. 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.

In order to reduce any negative impact on the adjoining houses, 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 UDP.

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, however 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 and therefore the impact on these properties should have been assessed.

The criteria against which the noise impacts of proposed recreational and sporting activities should be assessed are set out in the Council's SPD on Noise. For daytime noise in respect of the proposed daytime use (between 0700 - 2300) the recommended noise level for outdoor living areas should be as low as reasonably practicable and not greater than 50dB LAeq, with indoor living areas not greater than 35dB LAeq. As such, this criteria does not prescribe maximum noise levels for impulse noise sources (Lmax), such as impact sound or from player voices, but sets out an LAeq limit, the equivalent continuous noise level measured over a given time period.

It should be noted that in terms of impulse noise sources (player voices and impact sound), the measurements show a projected 4.2dB increase at adjacent 80 Park Avenue when measured from the centre of the proposed pitch, which accords with the methodology used throughout the report. To put this in context, the Environmental Protection Unit advises that the minimum perceptible increase that the human ear can determine is 3dB, therefore whilst this is acknowledged as a discernible increase it is considered that this is acceptable given the similar noise impacts resulting from the existing grass pitches during daylight hours, which are located closer to Park Avenue.

A distance of 163m is maintained from the centre of the proposed pitch to 10 metres south of the existing pitch adjacent to properties on Evelyn Avenue (position B). The Environmental Protection Unit advise that the additional noise impact at Position B is imperceptible. A similar non-perceptible impact would be calculated at Position C (10 Meadow Close).

With regard to the 1st Floor residences at King's College Pavillion the distance to the centre of the proposed pitch from the facade is 131m. These dwellings do not have external amenity space and as such the 50dB Leq limit will not apply. The effect of a partially opened window would reduce the level by at least 10dB, which would comply with the indoor SPD criteria of 35dB Leq. In fact, the proximity of the public highway actually means that the background noise levels are likely to be in excess of 44dB such that the projected impact on the indoor Leq will be non-perceptible up to the curfew time of 21:30.

Measurements of noise from sources at the existing hockey pitch have been recorded alongside periods where the pitch was not in use (background noise), both on a Thursday evening with a mixture of men's and women's matches and training sessions. This is representative of noise levels on a typical evening's use.

The Environmental Protection Unit has reviewed the above noise survey report and notwithstanding the deficiencies in the noise assessment, is satisfied that when corrected for distance and the cumulative nature of the proposal effectively to have two pitches in

operation, that the noise levels are within the requirements of the Council's SPD on noise. In the event of planning permission being granted it is considered necessary to impose conditions restricting the use of the development to between 0700 and 9.30 hours only in order to safeguard the amenities of the occupiers. 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 conditions, it is not considered that the residential amenities of surrounding occupiers will be adversely affected by the proposals in terms of noise, in accordance with policies OE1 and OE3 of the UDP.

7.19 Comments on Public Consultations

One of the main objections raised by local residents to the proposed scheme is that 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.

Whilst covenants on land are not normally considered to be planning matters, it is noted that 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. Clearly, an enclosed swimming pool would have a similar impact, if not greater than, the all weather pitch, in terms of conversion of some of the grassland into an enclosed area.

Issues relating to ecology, flood risk, residential amenity, highway implications have been addressed in the main body of the report.

7.20 Planning Obligations

Policy R17 of the Hillingdon UDP is concerned with securing planning obligations, environmental improvements and enhancement. This UDP policy is supported by specific Supplementary Planning Guidance. As the application is being recommended for refusal, no detailed negotiations have been entered into with the developer in respect of these obligations, although the applicants have indicated that they are prepared to enter into negotiations with respect to certain obligations.

However, if the application were to be considered for approval, the following broad Section 106 Heads of Terms would be pursued by the Council at that time:

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).
2. The laying 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 (offered by the applicant)
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.

With regard to obligations 1 and 2, PPG17 notes that proposed replacement/alternative facilities should be secured by condition or planning obligations. In this case, given that the replacement/refurbished facilities are located beyond the site boundary, a planning obligation would be required to secure the provision of these facilities.

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

Not applicable to this application.

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

Sport England advise that in this case they will not oppose the granting of planning permission as the proposed development is for an 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. No objections are therefore raised to the principle of the intensification of use of the playing fields.

It is not considered that the fundamental open character of the area would be affected by the proposal. Any adverse impact on the open space would be outweighed by the benefits associated with the new facilities, which are appropriate to this green chain location and should help to improve recreational facilities in this area.

Public Right of Way will remain uninterrupted by the development and it is not considered that the proposal would have such a detrimental effect on the visual amenity of the public footpath as to justify refusal on these grounds.

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.

The proposed development could be completed without detriment to the recognised ecological value of this area, including the adjacent River Pinn corridor, subject to conditions. In addition, subject to conditions recommended by the Environment Agency, it is considered that development would not increase the risk of flooding and the statutory functions of the Agency would not be compromised.

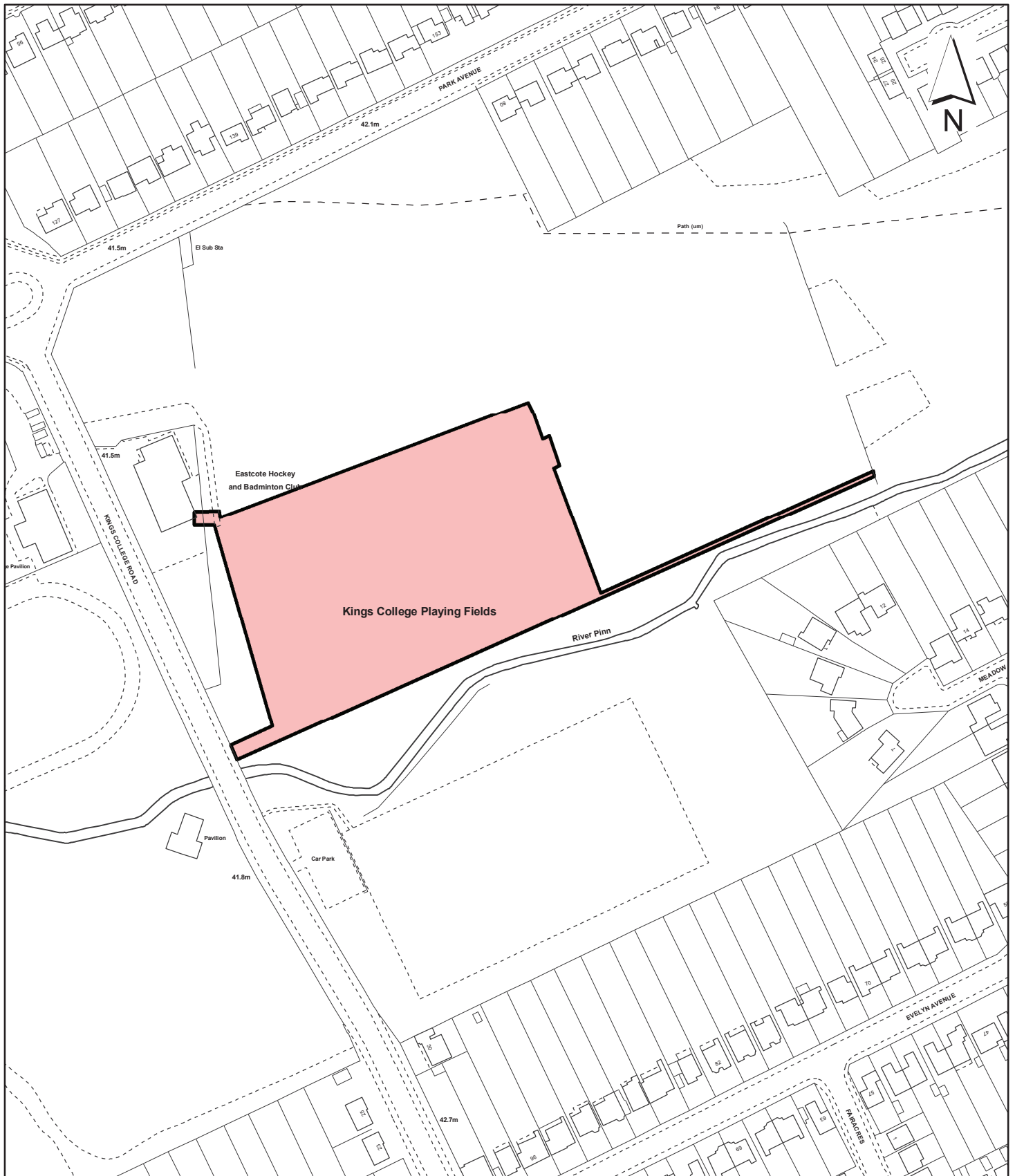
However, the applicant has failed to provide an accurate quantitative and qualitative assessment of the transportation aspects of the proposed development. The proposal would result in inadequate provision for off street car parking to deal with the demands of the development. In addition, excavations associated with the development would be within the canopy and root protection area of important Oak trees at the western edge of the proposed pitch, to the detriment of their survival and 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 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

PPS1: Delivering Sustainable Development February 2004
PPS7: Sustainable Development in Rural Areas July 2004
PPS9: Biodiversity and Geological Conservation September 2005
PPG13: Transport March 2001
PPG16: Archaeology and Planning November 1990
PPG17: Open Space, Sport and Recreation September 2001
PPPS 25: Development and Flood Risk
Unitary Development Plan Saved Policies (September 2007).
London Plan 2011
Supplementary Planning Guidance/Documents
Responses from consultees

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Notes

 Site boundary

For identification purposes only.

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Site Address

**Kings College Playing Fields
Kings College Road
Ruislip**

**LONDON BOROUGH
OF HILLINGDON**
Planning,
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Planning Application Ref:

2414/APP/2011/2661

Scale

1:2,000

Planning Committee

North

Date

**January
2012**



HILLINGDON
LONDON