

## Report of the Head of Planning, Transportation and Regeneration

**Address** EALING COUNCIL OUTBOROUGH MIDDLESEX

**Development:** Demolition of all existing buildings on the site; retention and enhancement of existing outdoor sports grass cricket pitch and creation of new outdoor grass pitch; floodlighting and permeable hard landscaping; erection of a new community sports building (providing supporting facilities to the outdoor sports pitches including changing rooms, kitchens, spectator seating and viewing areas approx 5436m<sup>2</sup>) including indoor multi-use sports halls and gym, multi-use meeting/function rooms; cafe; erection of detached single storey groundskeeper's residence; associated landscaping; car parking; creation of new pedestrian, cycling and vehicular access (including a new vehicular access onto West End Road); and associated drainage and infrastructure works at SKLPC Community Centre and Sports Ground India Gardens, West End Road, Northolt (Out of Borough Consultation from London Borough of Ealing)

**LBH Ref Nos:** 39704/APP/2018/1817

**Drawing Nos:** Various plans and supporting documentation

**Date Plans Received:** 15/05/2018

**Date(s) of Amendment(s):**

**Date Application Valid:** 15/05/2018

### 1. SUMMARY

This is an out of borough consultation from the London Borough of Ealing on the Shree Kutch Leva Patel Community (SKLPC) site which adjoins the eastern boundary of the borough on the eastern side of the A4180 West End Road, immediately to the south of the A40 and the Polish War Memorial Roundabout.

The site is located within the Green Belt. It is considered that the proposal for a large community / sports building on this site represents inappropriate development and the 'very special circumstances' needed to justify such a substantive increase in the amount of building floor space on site and to overcome the harm by reason of inappropriateness and all other harm, including the increased intensity of the use of the site, associated traffic generation and potential for noise, pollution and light pollution have not been demonstrated.

The Highway Engineer also formally objects to the proposal as it would exacerbate local parking stress giving rise to injudicious parking on the public highway and traffic congestion which raises highway safety and capacity concerns and has associated implications for air quality.

The potential of such a significant up-lift in the floor area of accommodation on site also has implications for the amenity of surrounding Hillingdon residents which needs to be carefully controlled.

The Local Planning and Highway Authorities therefore formally object to the proposals.

### 2. RECOMMENDATION

**That:-**

- 1. The Council formally object to the proposal for the reasons stated within the Officer's report.**
- 2. All consultation responses are forwarded to Ealing Council.**

**1           NON2           Non Standard reason for refusal**

The proposed community / sports building, given its size, scale and design would be prejudicial to the openness and rural character of this part of the Green Belt. The proposal, which would introduce significant indoor sports/gymnasium and social and community facilities onto the site represents inappropriate development within the Green Belt and it is considered that it has not been adequately demonstrated that the harm by reason of inappropriateness and all other

harm, including the increased intensity of the use of the site, associated traffic generation and potential for noise, pollution and light pollution from floodlighting and the predominantly glazed upper floor of the building has been clearly outweighed. The proposal is therefore contrary to the NPPF, Policy 7.16 of the London Plan (March 2016), Policies PT1.BE1 and PT1.EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policies OL1, OL4 and BE13 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

**2           NON2           Non Standard reason for refusal**

The proposal, with a very substantive increase in the internal floor area and facilities provided on site for community and sports use would give rise to the potential for a similar substantive increase in the intensity of use of the site whereas there is no corresponding substantive increase in on-site parking provision. Notwithstanding the likely detrimental impact on the Green Belt, in the absence of an uplift of parking provision on site, the proposal is likely to exacerbate local parking stress giving rise to injudicious parking on the public highway, particularly Harvey Road and Sharvel Lane which would be prejudicial to the efficient operation of the surrounding road system and highway and pedestrian safety, contrary to Policies 6.3 and 6.13 of the London Plan (March 2016) and Policies AM2, AM7 and AM14 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

**3           NON2           Non Standard reason for refusal**

Hillingdon Highway Authority has reviewed the application and considers the use of 'TRICS' data as opposed to the use of extensive 'real world' site specific traffic surveys on several appropriate and suitable occasions which would then afford a true reflection and profile of activities on site as regrettable. As this proposal has been evolving for a considerable time, there would have been ample opportunity to undertake such surveys to depict typical and worst case scenarios affiliated to site activities. As such the 'TRICS' sourced baseline estimation, as presented, is considered flawed and unreflective of actual site activities.

Notwithstanding this aspect of the appraisal, using the trip data as submitted, the planning submission has indicated a substantial daily rise in 'sporting' activity with the strong potential for a similar increase in 'community' related use. The presented traffic generation increases for the 'sports' use are considered as conservative (increasing from approximately 400 to over 900 daily vehicle movements) as they exclude community functions such as weddings and festival events. The notable 'end game' traffic impacts would focus predominantly on the A40 Polish War Memorial roundabout which, based on the considered underestimate in traffic generation, the applicant has stated would give rise to an optimistic 2% increase on base traffic flows at this junction during peak periods. It is likely that in reality this increase could easily rise to twice that predicted at peak community event periods if and when they coincide with sporting activities. There is no submitted data that would indicate otherwise. It is highlighted that no highway mitigations

have been considered or proposed by the applicant.

It is also noted that the applicant has not undertaken a full capacity assessment of the main roundabout or presented a likely 'itinerary of sporting and community events' depicting how the two site functions would mutually coexist with highway baseline activities and what cumulative impacts would emerge in a worst case scenario of activity. Such an absence of analysis prevents a fully informed decision to be made on whether or not actual spare highway capacity exists. Without such information and considering the current observed capacity challenges imposed on the road network local to the site it is concluded that, as a consequence of the proposal, the highway network within Hillingdon's and TfL's domain would be expected to exhibit discernible 'real world' impacts to the detriment of highway capacity and resultant congestion which raises highway safety and capacity and air quality concerns, contrary to Policies 6.3, 6.13 and 7.14 of the London Plan (March 2016) and Policies AM2, AM7 and AM14 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

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

The proposal represents a significant up-lift in the amount of floor space and potential for the increase in the intensity and duration of uses on the site which could seriously erode the quiet enjoyment and residential amenities currently enjoyed by surrounding residents. Any potential impacts need to be carefully controlled such as hours of use of the site, restriction on floodlighting hours, no outdoor music/ amplified sound in order to accord with Policy 7.15 of the London Plan (March 2016) and Policies OE1 and OE3 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

### **3. CONSIDERATIONS**

#### **3.1 Site and Locality**

The 7.6 hectare site is located immediately to the east of the A4180 West End Road, to the south of the A40 on the Polish War Memorial roundabout. The site has a maximum width of some 400m and depth of 275m, with a 250m frontage onto West End Road, before it wraps around an area of public open space which fronts the road and housing on Harvey Road behind.

The site currently provides grassed sports pitches on approximately 5.4 hectares of the rearmost part of the site, which includes some floodlighting; a two storey extended sports pavillion which includes a caretaker's flat and a sports hall building sited towards the front of the site; various ancillary single storey buildings, including a groundskeepers house; a redundant bowling green and associated buildings at the front of the pavilion building and areas of hardstanding at the front of the site which are mainly used for car parking.

The site is accessed from West End Road, close to the roundabout and has a mini traffic island within the highway verge at the front of its entrance, with the northern limb providing access from West End Road and egress provided by the southern limb. Access can only be gained by southward bound vehicles from the A40 roundabout due to the central reservation which extends along West End Road from the roundabout, whereas exiting vehicles can turn in both north and south bound directions.

The nearest residential properties to the application site are those which front the southern and western boundaries of the site on Harvey Road, a 'T'-shaped cul-de-sac off West End Road to the south of the site which are located within Hillingdon Borough. To the east of the

site is a golf course and to the west of the site, on the opposite side of West End Road is a country club and golf course.

The site and surrounding areas, apart from Harvey Road form part of the Metropolitan Green Belt.

### **3.2 Proposed Scheme**

The London Borough of Ealing has consulted Hillingdon on this scheme for the re-development of the SKLPC Community Centre and Sports Ground India Gardens, West End Road, Northolt.

The proposed part single storey, part two storey community and sports building would have a similar siting to the existing main buildings on site and have a maximum length of some 150m and overall depth of 75m. The building would have an elongated curved, cruciform footprint with its main axis fronting the road and a gently sloping arched green roof which rises from ground level on the northern side to a maximum height of some 13m in the centre and is cut away on the southern side to provide an outdoor raised terrace and viewing platform. On the ground floor, the building would provide a 70m long sports hall (1,825sq.m) with storage areas, 2 x 320sq.m sports rooms/dining rooms, changing facilities, toilet facilities, 2 x kitchens, offices, members club, social space, lobby, cafe and plant room. On the first floor the building would contain a gymnasium with 3 fitness rooms and a cycle spinning room, toilets and meeting rooms with the outdoor terrace and viewing platform.

The proposal also includes the replacement and relocation of the existing outdoor grass cricket pitch (which has a tendency to become waterlogged) with a new drained cricket pitch, together with practice nets; creation of a second outdoor cricket pitch; creation of an outdoor football pitch (for use outside of the cricket season) with floodlights; replacement of the scattered car parking (and overspill car parking on the sports pitches) with a dedicated car park fronting West End Road; adjacent overspill parking capacity on permeable hard landscaping and a new vehicular access to the south of the site onto West End Road; creation of new pedestrian and cycle links; replacement of existing groundskeeper's residence with a new residence at the entrance to the site and enhanced landscaping to the site boundaries and around the new sports/ community building.

The proposal is explicit in noting that not all of the proposed uses will be directly or wholly related to open sport and recreation and the intention as stated in the Planning Statement at Para. 2.28 is to create a 'centre for the community which will be important, not only for notable formal events, such as festivals and weddings but also for more informal opportunities for community to meet each other and receive support.'

### **3.3 Relevant Planning History**

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

N/A to this consultation.

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

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

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

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM5 (2012) Sport and Leisure
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM8 (2012) Land, Water, Air and Noise

Part 2 Policies:

- NPPF1 NPPF - Delivering sustainable development
- NPPF9 NPPF - Protecting Green Belt land
- NPPF10 NPPF - Meeting challenge of climate change flooding coastal
- LPP 3.19 (2016) Sports Facilities
- LPP 6.3 (2016) Assessing effects of development on transport capacity
- LPP 6.13 (2016) Parking
- LPP 7.15 (2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
- LPP 7.16 (2016) Green Belt
- OL1 Green Belt - acceptable open land uses and restrictions on new development
- OL4 Green Belt - replacement or extension of buildings
- BE13 New development must harmonise with the existing street scene.
- BE20 Daylight and sunlight considerations.
- BE21 Siting, bulk and proximity of new buildings/extensions.
- BE24 Requires new development to ensure adequate levels of privacy to neighbours.
- 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
- AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
- AM7 Consideration of traffic generated by proposed developments.
- AM14 New development and car parking standards.

## **5. Advertisement and Site Notice**

5.1 Advertisement Expiry Date:- Not applicable

5.2 Site Notice Expiry Date:- Not applicable

## **6. Consultations**

### **External Consultees**

Hillingdon has consulted 20 adjoining residential properties in Harvey Road which adjoin the site,

together with the South Ruislip Residents' Association.

3 consultation responses have been received, objecting to the proposal on the following grounds:-

(i) My property has a boundary with this site and I particularly object to floodlighting, spectator seating and viewing areas as this will have a huge detrimental effect on light and sound pollution where I reside. Already noise from events is too loud & disruptive so needs to be reduced not increased. I urge you to refuse this application of this scale on this site close to a residential street that has been here since 1937.

(ii) As a resident for 16 years, I totally object to this planning application, as a resident of Harvey Road. Our main concern is the effect it will have on traffic, and parking issues, which is always a major problem when there are events at SKLP. West End Road traffic is bad anyway, and this would increase volume and flow of traffic. When there is an event at the moment there isn't always any form of traffic control in our street, and cars park anywhere and everywhere, blocking drives without any concern for residents. It seems that the new proposal will increase the numbers of visitors and the parking proposal will not solve this. Also, I understand that it will be left turn only out of the SKLP, which will result in all cars who wish to turn right entering our road to turn round.

Having been a resident for 20 years and had problems with events during that time I am objecting to a bigger building and so few parking spaces (500). I attended their consultation and the plans look spectacular but the traffic consultant could not provide an answer to ease traffic on the surrounding roads. Even after the consultation at the most recent event which was a third party event over the Easter weekend. There was so much traffic the area became impassable because there was insufficient parking guests were abandoning their cars on the paths, verges & across drives. Hillingdon parking enforcement were in attendance and ticketed a number of cars. This event could not be managed as there was nowhere for cars to go!!! SKLPC propose to have 10,000 people at their own festivals once this site is redeveloped. The area cannot cope with this level of additional cars.

It is also understood that a petition has been prepared by local residents. This had not been received at the time of writing this committee report and an update will be provided in the addendum report if it is received.

A ward Cllr has objected to this application.

### **Internal Consultees**

Highway Engineer:

The Council's Highway Engineer advises that as the site has a low PTAL of 1, there is a high dependency on the private car amongst users of the site.

### **Parking**

The site is an active sports and community site and produces traffic generation burden on the highway network within Hillingdon. There is currently a single access/egress from the site which is served directly from a small slip road off West End Road. Access is only possible for southbound vehicles exiting the PWM roundabout in a southerly direction whereas site departure can occur in either northern or southerly directions onto West End Road. A secondary egress is located some 20m due south of the main access and is only used during busier times during 'high attendance' events in order to assist in the dispersal of general vehicular activity.

The planning submission has indicated that intensity of both the sports and community use would rise in line with the substantive increase in the redeveloped floor area. The predicted enhanced 'sports' use indicates a 100% increase of daily vehicle activity as compared with current activities. This rise

does not include for the community aspect which is additional to the sporting events. Events such as weddings and festivals such as Mela, Navratri and Dussehra can typically generate up to 1500 and 3000 patrons respectively. It is confirmed that the Mela festival actually generated 6000 attendees in 2017 hence there is significant concern with the enlarged development attracting even greater numbers if the application receives consent.

It is noted that despite the substantive proposed increase in internal floor of the site buildings, the quantum of on-site parking is to remain unchanged at an approximate level of 250 but with 'grasscrete' areas for any parking overspill that may occur. This level is considered justified by the applicant as on-street parking is quoted as being unavailable due to the physical constraints of the local road network namely the highly trafficked and restricted width of West End Road which is designated as a Transport for London (TfL) bus 'red route' clearway. It is acknowledged that such designation acts as a strong parking deterrent and it is also accepted that this road inherently dissuades parking due to the perception of 'potential exposure to vehicle damage' and therefore becomes 'self-regulating' by acting as a natural deterrent to on-street parking without the need for formal parking restrictions.

There are however a high number of existing concerns raised by local residents, with confirmed observations made by officers, that allude to injudicious and excessive displaced parking being evident and widespread within the neighbouring cul-de-sac - Harvey Road (which abuts the site boundary) and the access slip road at the entrance to the site coupled with areas in the vicinity of Sharvel Lane (south of the site) during active periods. A formal objection to the proposal has also been received from the South Ruislip Residents Association which highlights the unsuitability of expanding site activities given the already excessive parking and highway impacts on the public realm.

As the level of on-site parking is to remain unaltered for the substantially enlarged proposal, local and injudicious parking displacement onto the public highway has the potential to substantially increase due to the proposed increased scale of site operation which is also bolstered by the poor site PTAL of 1 which results in an increased dependency on 'single occupancy' car journeys thereby further compounding matters.

#### Traffic Generation

From Hillingdon's perspective any potential impacts of concern would be concentrated on the A40 PWM roundabout which currently suffers from capacity and congestion issues at peak traffic periods and affects Hillingdon directly. Transport for London (TfL) also have a vested interest in the matter as the A40 falls under their jurisdiction.

Hillingdon Highway Authority has reviewed the application and considers the use of 'TRICS' data as opposed to the use of extensive 'real world' site specific traffic surveys on several appropriate and suitable occasions which would then afford a true reflection and profile of activities on site as regrettable. As this proposal has been evolving for a considerable time, there would have been ample opportunity to undertake such surveys to depict typical and worst case scenarios affiliated to site activities. As such the 'TRICS' sourced baseline estimation, as presented, is considered flawed and unreflective of actual site activities.

Notwithstanding this aspect of the this appraisal, using the trip data as submitted, the planning submission has indicated a substantial daily rise in 'sporting' activity with the strong potential for a similar increase in 'community' related use. The presented traffic generation increases for the 'sports' use are considered as conservative (increasing from approximately 400 to over 900 daily vehicle movements) as they exclude community functions such as weddings and festival events. The notable 'end game' traffic impacts would focus predominantly on the A40 Polish War Memorial roundabout which, based on the considered underestimate in traffic generation, the applicant has stated would give rise to an optimistic 2% increase on base traffic flows at this junction during peak

periods. It is likely that in reality this increase could easily rise to twice that predicted at peak community event periods if and when they coincide with sporting activities. There is no submitted data that would indicate otherwise. It is highlighted that no highway mitigations have been considered or proposed by the applicant.

It is also noted that the applicant has not undertaken a full capacity assessment of the main roundabout or presented a likely 'itinerary of sporting and community events' depicting how the two site functions would mutually coexist with highway baseline activities and what cumulative impacts would emerge in a worst case scenario of activity. Such an absence of analysis prevents a fully informed decision to be made on whether or not actual spare highway capacity exists. Without such information and considering the current observed capacity challenges imposed on the road network local to the site it is concluded that, as a consequence of the proposal, the highway network within Hillingdon's and TfL's domain would be expected to exhibit discernible 'real world' impacts to the detriment of highway capacity and resultant congestion.

#### Synopsis

The application has been reviewed by the Highway Authority and it is considered that the proposal, as presented, would exacerbate local parking stress giving rise to injudicious parking on the public highway and traffic congestion which raises highway safety and capacity concerns, contrary to policies AM2, AM7 and AM14 of the Development Plan (2012) and policies 6.3 and 6.13 of the London Plan (2016).

A formal objection to the proposal on the above grounds is therefore recommended.

## **7. MAIN PLANNING ISSUES**

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

The application site forms part of the Metropolitan Green Belt.

Paragraph 89 of the NPPF advises that the construction of new buildings in the Green Belt constitutes inappropriate development, although there are exceptions, including the:-

'provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it'.

Policy 7.16 of the London Plan seeks to maintain the protection of London's Green Belt and seeks to ensure that inappropriate development in the Green Belt should not be approved except in very special circumstances.

The proposed community / sports building does include extensive indoor sports facilities such as a large sports hall, gymnasium and fitness rooms, kitchens, office space and meeting rooms, a Members club and cafe so that only a small part of the facilities proposed would directly serve the adjoining playing pitches and therefore be appropriate. The application is explicit in that it recognizes that not all of the proposed uses will be directly or wholly related to open sport and recreation and the intention is to create a centre for the community which will cater for formal events, such as festivals and weddings but also provide for more informal opportunities for the community to meet each other and receive support. As such the scheme represents inappropriate development and 'very special circumstances' are required to justify the scheme.

The existing building floor area on site is estimated at approximately 2100sq. m with a 55,000 m2 sports field with on-site parking provisions for up to 250 vehicles. The proposal would increase the sports/community facility building area to approximately 5400sq. m with



similar sports pitch and parking space provision. This is a substantive increase.

The proposed building would have a maximum length of some 150m and overall depth of 75m and maximum height of some 13m, with the first floor on the long front and rear elevations being predominantly glazed. Although the building, which includes an arched green roof would help to reduce the impact of the building, it is still a massive structure that would harm the openness of the site as compared to the existing buildings. The site would also broadly cater for a similar use profile as the existing facilities on site, but given the up-lift in floor space, with some new facilities being provided such as the gymnasium, as a minimum, a proportional increase in use intensity could reasonably be expected with associated traffic generation and the potential for noise, pollution and light pollution from the proposed floodlighting and the predominantly glazed upper floor of the building.

As such, the proposed community / sports building, given its size, scale and design and increased intensity of the use of the site would be prejudicial to the openness and rural character of this part of the Green Belt. The proposal, which would introduce significant indoor sports/gymnasium and social and community facilities onto the site represents inappropriate development within the Green Belt and it is considered that it has not been adequately demonstrated that the harm by reason of inappropriateness and all other harm, including the increased intensity of the use of the site, associated traffic generation and potential for noise, pollution and light pollution from floodlighting and the predominantly glazed upper floor of the building has been clearly outweighed. The proposal is therefore contrary to the NPPF, Policy 7.16 of the London Plan (March 2016), Policies PT1.BE1 and PT1.EM2 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policies OL1, OL4 and BE13 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

A formal objection to the proposal based on the above ground is therefore raised by the Local Planning Authority.

**7.02 Density of the proposed development**

Not applicable to this development.

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

There are no known heritage assets that would be affected by the proposal.

**7.04 Airport safeguarding**

Not applicable to this development.

**7.05 Impact on the green belt**

See above.

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

As referred to in Section 7.01 of the officer's report above, the proposed community / sports building, given its size, scale and design and increased intensity of the use of the site would be prejudicial to not just the openness of the Green Belt, but also the rural character of this part of open countryside. The proposal would therefore fail to accord with Policy PT1.BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policy BE13 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

A formal objection to the proposal based on the above ground is therefore raised by the Local Planning Authority.

**7.08 Impact on neighbours**

The proposed community / sports building would be sited to the north (to the side) of

existing properties on Harvey Road and the nearest single storey element of the building which would have the raised outdoor terrace on its roof would be some 29m from the side boundary of the nearest property, No. 78 Harvey Road, with the nearest two storey element of the building sited 49m away. The side boundary of the site provides a conifer screen and as part of the proposal, additional landscaping in the form of tree planting would be provided adjacent to the proposed building.

The separation distances are sufficient to ensure that there would be no adverse impact on the residential amenity of the neighbouring properties in Hillingdon by reason of overshadowing, dominance or loss of privacy in accordance with Policies BE20, BE21 and BE24 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's relevant design guidance.

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

Not applicable to this development.

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

The Council's Highway Engineer advises that the site has a very low PTAL of 1 which inherently heightens dependency on the private motor car by patrons of the establishment. The site is currently in use as an active sports and community site and produces a traffic generation burden on the highway network within Hillingdon.

##### **Car Parking**

The Highway Engineer advises that the planning submission has indicated that the intensity of both the sports and community use would rise in line with the substantive increase in the redeveloped floor area. The predicted enhanced 'sports' use indicates a 100% increase of daily vehicle activity as compared with current activities. This rise does not include the community aspect which is additional to the sporting events. Events such as weddings and festivals such as Mela, Navratri and Dussehra can typically generate up to 1500 and 3000 patrons respectively. It is confirmed that the Mela festival actually generated 6000 attendees in 2017 hence there is significant concern with the enlarged development attracting even greater numbers if the application receives consent.

The Engineer goes on to note that despite the substantive proposed increase in internal floor of the site buildings, the quantum of on-site parking is to remain unchanged at an approximate level of 250 spaces but with 'grasscrete' areas for any parking overspill that may occur. This level is considered justified by the applicant as on-street parking is quoted as being unavailable due to the physical constraints of the local road network namely the highly trafficked and restricted width of West End Road which is designated as a Transport for London (TfL) bus 'red route' clearway. It is acknowledged that such designation acts as a strong parking deterrent and it is also accepted that this road inherently dissuades parking due to the perception of 'potential exposure to vehicle damage' and therefore becomes 'self-regulating' by acting as a natural deterrent to on-street parking without the need for formal parking restrictions.

There are however a high number of existing concerns raised by local residents, with confirmed observations made by officers, that allude to injudicious and excessive displaced parking being evident and widespread within the neighbouring cul-de-sac at Harvey Road (which abuts the site boundary) and the access slip road at the entrance to the site coupled with areas in the vicinity of Sharvel Lane (south of the site) during active periods. A formal objection to the proposal has also been sent by the South Ruislip Residents' Association which highlights the unsuitability of expanding site activities given the already excessive parking and highway impacts on the public realm.

As the level of on-site parking is to remain unaltered for the substantially enlarged proposal, local and injudicious parking displacement onto the public highway has the potential to substantially increase due to the proposed increased scale of site operation which is also bolstered by the poor site PTAL of 1 which results in an increased dependency on 'single occupancy' car journeys thereby further compounding matters.

#### Traffic Generation

The Highway Engineer advises that from Hillingdon's perspective, any potential impacts of concern would be concentrated on the A40 PWM roundabout which currently suffers from capacity and congestion issues at peak traffic periods and affects Hillingdon directly. Transport for London (TfL) also have a vested interest in the matter as the A40 falls under their jurisdiction.

The Highway Engineer goes on to advise that although traffic surveys with observed queue lengths have been undertaken at the PWM A40 junction to establish local traffic background levels it is unfortunate that the applicant omitted surveying traffic activities generated by the proposal site itself. In lieu of this, the nationally recognised 'Trip Rate Information Computer System' (TRICS) vehicle trip generation database for different land uses and comparable sites has been applied in order to establish a typical representation of the existing level of activity generated by the site. Interrogation of this database is an accepted practise for estimating proposal impacts with an acknowledgement of output being considered as an informative guidance tool given that there are 'built in' inaccuracies with the process as no two sites or demographic use profiles are exactly comparable. As a consequence, the accepted practise and most accurate method of presenting existing levels of site activity would be to undertake extensive 'real world' site specific traffic surveys on several appropriate and suitable occasions which would then afford a true reflection and profile of activities. As this scheme proposal has been evolving for the past several years, there would have been ample opportunity to undertake such a process to depict typical and worst case scenarios affiliated to site activities. As such the 'TRICS' sourced baseline estimation, as presented, is considered flawed and unreflective of actual site activities. Notwithstanding this aspect this appraisal considers the trip data as submitted.

The Highway Engineer in their assessment of traffic generation advises that as referred to within the previous sub-heading, the planning submission has indicated a substantial daily rise in 'sporting' activity with the strong potential for a similar increase in 'community' related use. The presented traffic generation increases for the 'sports' use are considered as conservative (increasing from approximately 400 to over 900 daily vehicle movements) as they exclude community functions such as weddings and festival events. The notable 'end game' traffic impacts would focus predominantly on the A40 PWM roundabout which, based on the considered underestimate in traffic generation, the applicant has stated would give rise to an optimistic 2% increase on base traffic flows at this junction during peak periods. It is likely that in reality this increase could easily rise to twice that predicted at peak community event periods if and when they coincide with sporting activities. There is no submitted data that would indicate otherwise. It is highlighted that no highway mitigations have been considered or proposed by the applicant.

The Engineer also notes that the applicant has not undertaken a full capacity assessment of the main roundabout or presented a likely 'itinerary of sporting and community events' depicting how the two site functions would mutually coexist with highway baseline activities and what cumulative impacts would emerge in a worst case scenario of activity. Such an absence of analysis prevents a fully informed decision to be made on whether or not actual spare highway capacity exists. Without such information and considering the current observed capacity challenges imposed on the road network local to the site it is concluded

that, as a consequence of the proposal, the highway network within Hillingdon's and TfL's domain would be expected to exhibit discernible 'real world' impacts to the detriment of highway capacity and resultant congestion.

#### Synopsis

The application has been reviewed by the Highway Authority and it is considered that the proposal, as presented, would exacerbate local parking stress giving rise to injudicious parking on the public highway and traffic congestion which raises highway safety and capacity concerns, contrary to policies AM2, AM7 and AM14 of the Development Plan (2012) and policies 6.3 and 6.13 of the London Plan (2016).

Officers recommend that a formal objection to the proposal on the above grounds is therefore recommended.

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

Security issues would be for Ealing to address.

#### **7.12 Disabled access**

Accessibility issues would not impact upon Hillingdon.

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

Not applicable to this development.

#### **7.14 Trees, landscaping and Ecology**

The scheme would not impact upon any topographical and/or landscape features of merit and new planting is proposed as part of the proposals.

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

Waste management issues associated with the development would not impact upon Hillingdon.

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

Renewable energy/ sustainability issues associated with the development would not impact upon Hillingdon.

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

Flooding and drainage issues associated with the development would not impact upon Hillingdon.

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

##### Noise Issues

Although the proposal would not alter the type of activity taking place on site, the proposal would give rise to a significant intensification of its use which could have significant implications for the amenities of Hillingdon residents adjoining the site on Harvey Road. It is therefore recommended that the permitted hours of use of the premises should not be extended and the hours of operation of the floodlights should be controlled so that they will not be permitted to be used in the late evening/ early hours of the morning. A condition should also be imposed to ensure that music/ amplified sound is only played within the building.

##### Air Quality Issues

As the Council's Highway Engineer is concerned that the traffic generation assessment is not sufficiently robust, there are concerns as regards the associated air quality assessment.

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

The public consultation responses received by Hillingdon in response to its consultation have been considered in this report and will be forwarded onto the London Borough of

Ealing.

#### **7.20 Planning obligations**

A S278 Agreement would be required for the secondary vehicular exit point on West End Road.

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

Not applicable to this consultation.

#### **7.22 Other Issues**

Not applicable to this consultation.

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

#### General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probitary in Planning, 2009.

#### Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

#### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

#### Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a

proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

## **9. Observations of the Director of Finance**

## **10. CONCLUSION**

The proposal represents inappropriate development within the Green Belt, the harm to which has not been sufficiently justified.

The Highway Engineer also formally objects to the proposal as the increase in the intensity of use of the site is likely to result in additional on-street parking on surrounding roads and the traffic generation analysis is not sufficiently robust. As such, it is considered that the proposal, as presented, would exacerbate local parking stress giving rise to injudicious parking on the public highway and traffic congestion which raises highway safety and capacity concerns. This would also have implications for air quality.

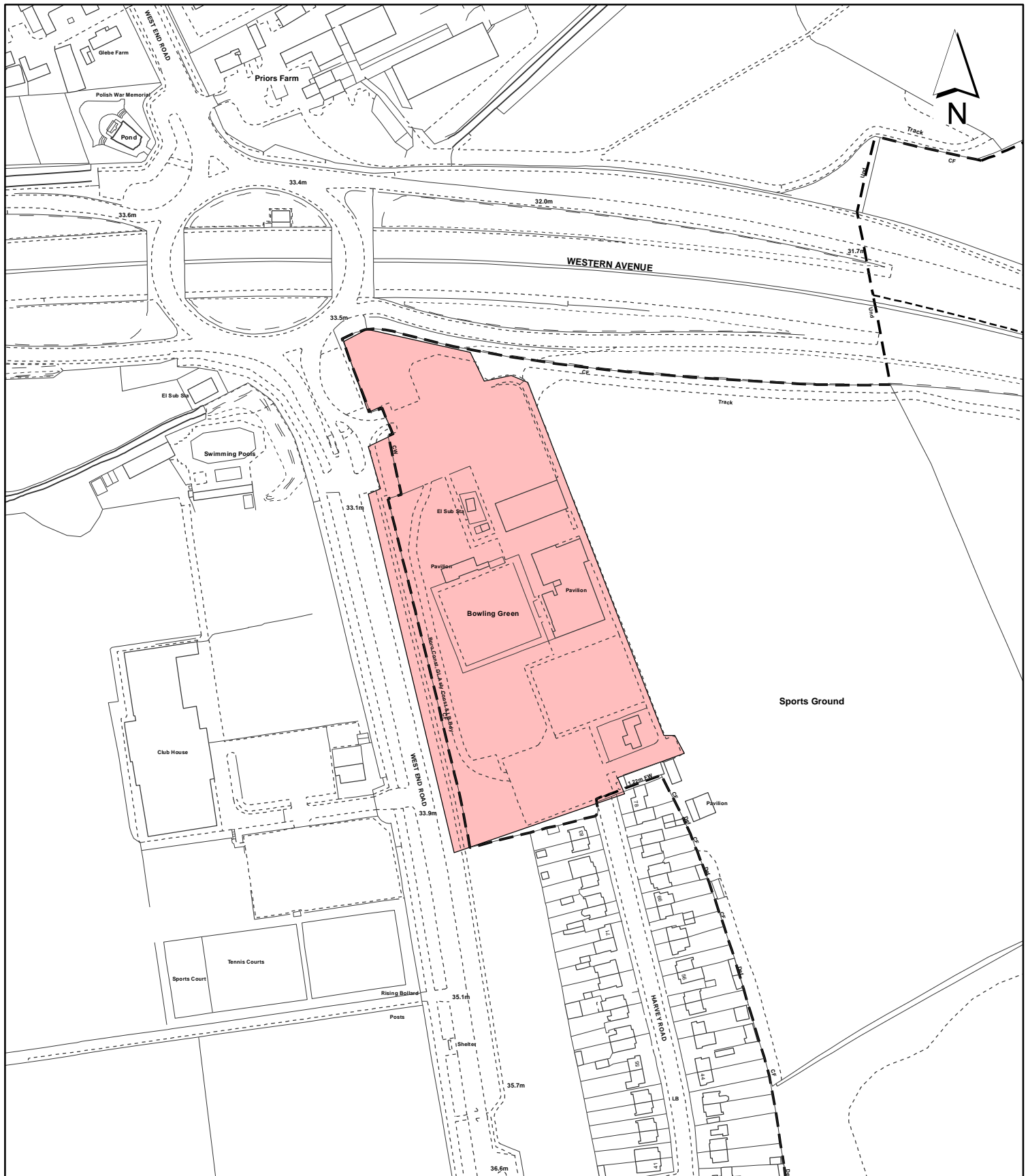
The potential for additional noise generation would also need to be carefully controlled.

## **11. Reference Documents**

NPPF (March 2012)  
London Plan (March 2016)  
Hillingdon Local Plan (November 2012)

**Contact Officer:** Richard Phillips

**Telephone No:** 01895 250230



**Notes:**

 Site boundary

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Site Address:

**SKLPC  
 Borough Obs**

Planning Application Ref:  
**39704/APP/2018/1817**

Planning Committee:  
**Major**

Scale:  
**1:2,500**

Date:  
**July 2018**

**LONDON BOROUGH  
 OF HILLINGDON**  
 Residents Services  
 Planning Section  
 Civic Centre, Uxbridge, Middx. UB8 1UW  
 Telephone No.: Uxbridge 250111

