

Report of the Head of Planning, Transportation and Regeneration

Address UNIVERSITY PLAYING FIELDS BRUNEL UNIVERSITY KINGSTON LANE
HILLINGDON

Development: Upgrade of existing sports pitch to provide World Rugby Compliant 3G Artificial Grass Pitch with associated perimeter fencing and technical dugout recessed areas, erection of temporary gym facility, and associated works

LBH Ref Nos: 532/APP/2020/1978

Drawing Nos: 01 Rev 04
Local views assessment
Cover Letter
SSL2766 03 Rev2
SSL2766 05 Rev 01
SSL2766 02 Rev4
Argrostis existing drainage specification
8164 03 02 Rev E
GWPR1479 - ground water investigation repor
Greenfield runoff rate
Suds proforma
Local views assessment - cemetery
Planning statement
Design and Access Statement (Pitch).
Design and Access Statement (Temporary Gym Facility)
Transport Statement
100 year + 40% Attenuation Calcs
SSL2766 07 Proposed Drainage Strategy Rev3.pdf
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Cover Letter
Duralock Spectator Barrier Fence Details
Greenfield runoff rate estimation too
Preliminary Ecology Appraisal badgers (1)
Preliminary Ecology Appraisal badgers (2)
Preliminary Ecology Appraisal (Reptile Survey)
Preliminary Ecology Appraisal
Utilities Search report
8394/DO Noise assessment Nov 2020

Date Plans Received:	29/06/2020	Date(s) of Amendment(s):	30/06/2020
Date Application Valid:	01/09/2020		29/06/2020
			18/11/2020
			01/09/2020

1. SUMMARY

The application seeks to upgrade the existing sports pitch, with associated perimeter fencing and technical dugout recessed areas, erection of temporary gym facility, and associated works. The works proposed are to enhance the Universities rugby program which they partner with Ealing Trailfinders who are a professional rugby club.

There is significant policy support for the enhancement and construction of sports

facilities at national, regional and local level. Furthermore the London Plan (existing and Draft) also provides in principle support for proposals which support London's world class higher education institutes such as universities.

The applicant has submitted a planning statement which demonstrates a need to expand the universities sports facilities as student numbers are rising generally and the demand for the current sports facilities at the university outstrips supply with over 4,000 students participating in some form of sport or physical activity each week either in one of the existing sports clubs or as members of the existing campus gym. As such the proposal is considered to comply with relevant policies at national, regional and local level.

The entire university campus is located within the Green Belt therefore an assessment against the relevant Green Belt policies has been undertaken to ensure that either the development is considered to be appropriate or the proposed harm is outweighed by the benefits of the scheme. It is acknowledged that the replacement of the pitch would comply with paragraph 145 exception b) within the NPPF and is therefore considered to be appropriate development.

The temporary gym does not meet any of the NPPF exceptions and is therefore considered inappropriate development for which very special circumstances should be demonstrated for it to be considered acceptable. The applicant has provided strong justification for the need to enhance the universities sports provision, the economic & social need, the benefits to the wider community and has submitted a visual impact assessment to demonstrate the developments impact to the openness of the Green Belt. After assessing this documents it is considered that the gym would not give rise to significant harm to the visual openness of the Green Belt and given the application proposes temporary consent for up to 5 years for the gym the harm would be reversible. As such the proposal is considered to be acceptable and comply with the paragraph 146 of the NPPF and policy Policy DMEI 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), and it should be noted that the GLA also support this view.

The proposal would result in a temporary loss of part of the playing field in order to accommodate the gym structure for which Sport England (SE) have provided comments. SE have taken a pragmatic approach by stating the harm caused by the temporary loss of the playing field are outweighed by the benefits of the proposal and support the provision of rugby. Notwithstanding this point a condition pertaining to the submission of a community use agreement has been included at Sport England's request in order to ensure that the wider public benefit from the replacement of the turf pitch with an Artificial Grass Pitch.

The proposal would not result in unacceptable harm to the amenities of neighbouring occupants or the local highway network. This application is recommended for approval subject to planning conditions and a legal agreement.

2. RECOMMENDATION

That delegated powers be given to the Head of Planning, Transportation and Regeneration to GRANT planning permission subject to:

A. The Council enters into an agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) and/or Section 278 of the Highways Act 1980 (as amended) and/ or other appropriate legislation to secure:

1. Air Quality Damage Cost. A contribution sum of £57,601 to address the resulting increase in air pollution emissions associated with this additional proposed

development.

2. **Travel Plan.** The applicant shall amend the universities existing site wide travel plan to incorporate the additional trips associated to the proposed development and it's community use.

3. The applicant shall agree to remove the gym structure within 5 years of the date of planning consent.

4. **Project management and monitoring fee:** A financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

B) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 Agreement and any abortive work as a result of the agreement not being completed.

C) That Officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.

D) If the Legal Agreements have not been finalised by 8th March 2021 (or such other timeframe as may be agreed by the Head of Planning, Transportation and Regeneration), delegated authority be given to the Head of Planning, Transportation and Regeneration to refuse planning permission for the following reason:

'The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of travel plan and air quality) herefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020); the adopted Planning Obligations Supplementary Planning Document (July 2014); Polices 8.2 of the London Plan (March 2016); Policy DF1 of the London Plan - Intend to Publish Version (December 2019); and paragraphs 54-57 of the National Planning Policy Framework (February 2019).'

E) That subject to the above, the application be deferred for determination by the Head of Planning, Transportation and Regeneration under delegated powers.

F) That if the application is approved, the following conditions be attached:-

1 COM3 Time Limit

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

2 COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers

SSL2766 02 Rev4
SSL2766 03 Rev2
Duralock Spectator Barrier Fence Details
8164 03 02 Rev E
SSL2766 05 Rev 01

and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2016).

3 COM5 General compliance with supporting documentation

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

Preliminary Ecology Appraisal
Preliminary Ecology Appraisal (Reptile Survey).
Preliminary Ecology Appraisal badgers (2)
Preliminary Ecology Appraisal badgers (1)
Transport Statement
GWPR1479 - ground water investigation report
Design and Access Statement (Pitch).
Design and Access Statement (Temporary Gym Facility)
SSL2766 Flood Risk Assessment and Drainage Strategy Rev3.pdf
SSL2766 07 Proposed Drainage Strategy Rev3.pdf

Thereafter the development shall be retained/maintained in accordance with these details for as long as the development remains in existence

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2016).

4 COM9 Landscaping (car parking & refuse/cycle storage)

No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping
 - 1.a Planting plans (at not less than a scale of 1:100),
 - 1.b Written specification of planting and cultivation works to be undertaken,
 - 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate, to include pollution absorbing trees.

2. Details of Hard Landscaping
 - 2.a Refuse Storage
 - 2.b Cycle Storage for 12 bikes
 - 2.c Means of enclosure/boundary treatments
 - 2.d Car Parking Layout for 1 accessible space
 - 2.e Hard Surfacing Materials

2.f External Lighting

3. Details of Landscape Maintenance

3.a Landscape Maintenance Schedule for a minimum period of 5 years.

3.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

4. Schedule for Implementation

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies 5.11 (living walls and roofs) and 5.17 (refuse storage) of the London Plan (2016)

5 NONSC Ecology

Prior to commencement of laying the artificial pitch, a scheme for the protection of the outlier badger sett identified within the badger survey shall be submitted to and approved in writing by the Local Planning Authority. Should the applicant be unable to provide sufficient protection for the sett to allow it to remain in situ then suitable written justification must be provided as to why it cannot be retained along with method statements regarding its closure; this written justification and method statement along with a detailed plan for the mitigation of the loss of sett shall be submitted to and approved in writing by the Local Planning Authority. The development must proceed in accordance with agreed written approach of the Local Planning Authority.

Reason

To ensure the development contributes to the protection of valuable species in accordance with EM7 of the Local Plan Part 1 (2012).

6 COM10 Tree to be retained

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'

Remedial work should be carried out to BS BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first

planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

7 RES24 Secured by Design

The buildings and car parks alongside the associated play areas and sports facilities shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No part of the development shall be occupied until accreditation has been achieved.

REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to ensure the development provides a safe and secure environment in accordance with policy DMHB 15 of the Local Plan Part 2 (2020) and London Plan (2016) Policies 7.1 and 7.3.

8 NONSC Sport England

Use of the development shall not commence until details of community use agreement has been submitted to and approved in writing by the Local Planning Authority. The agreement shall provide details of how the community use of the existing and proposed sports facilities is managed in order to demonstrate that the wider public will benefit from access to the development.

REASON

To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport in accordance with policy DMCI 3 of the Hillingdon Local Plan : Part 2 - Development Management Policies (2020).

9 NONSC Reinstatement Plan

Prior to the occupation of the development a reinstatement plan demonstrating how the area of playing field utilised for the accommodation of the temporary gym will be returned to its original state, shall be submitted and approved in writing by the Local Planning Authority.

REASON

To ensure the development complies Policy EM2 of the Local Plan: Part One (November 2012), DMEI 4 of the Hillingdon Local Plan : Part 2 - Development Management Policies (2020) London Plan Policy S5 (intend to publish version 2019) and paragraphs 145 & 146 of the NPPF (2019).

10 NONSC No additional floodlighting

There shall be no additional external floodlighting beyond that which is included within the plans hereby approved.

REASON

In order to protect the wildlife and ecological habitats within close proximity to the site in accordance with Policy EM7 of the Local Plan Part 1 (2012).

11 NONSC Air quality 1

No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

REASON:

Compliance with London Plan Policy 7.14 and in accordance with Mayor of London "The Control of Dust and Emissions from Construction and demolition (or any successor document).

12 NONSC Air quality 2

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>."

REASON:

Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy and London Plan Policy 7.14 (2016).

13 NONSC Construction management plan

Prior to commencement of development the applicant shall submit a Construction Management Plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

REASON

To safeguard the amenity of surrounding areas in accordance with Policy DMT 1 and DMT 2 of f the Hillingdon Local Plan: Part 2 - Development Management Policies (January

2020)

14 NONSC Crane operation plan

Prior to above ground works, if a Crane is required then a Crane Operation Plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence (RAF Northolt) and Heathrow Airport Limited. The submitted plan shall include details of:

- cranes and other tall construction equipment (including the details of obstacle lighting) - Such schemes shall comply with Advice Note 4 'Cranes and Other Construction Issues'(available at www.aoa.org.uk/policy-campaigns/operations-safety).

The approved Crane Operation Plan (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

REASON

In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

15 NONSC Imported soils

No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and or engineering purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted to the Local Planning Authority for approval.

REASON: To ensure that the occupants of the development are not subject to any risks from soil contamination in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

16 NONSC Contaminated land

1) Prior to the commencement of the development, the applicant shall carry out an updated ground gas survey to be conducted below the footprint of the proposed new temporary building. The details of this survey work shall be submitted to and approved in writing by the Local Planning Authority.

(a) If unacceptable concentration/s and flow of ground gas are detected, the applicant shall install gas protection measures to prevent gas ingress to the proposed building. The details of this remediation work shall be submitted to and approved in writing by the Local Planning Authority.

(b) Validation and verification information in respect of the remediation works detailed in (a) shall be submitted to and approved in writing by the Local Planning Authority.

The development shall be retained in accordance with the approved details.

REASON: The Council's records show that the development site has ground conditions which suggest possible ground gas risks may be present. A gas survey is required to clarify that there is no significant gas issues at the location of the proposed structure; all in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

17 NONSC Noise management plan

Prior to the occupation of the development, a noise management plan shall be submitted and approved by the Local Planning Authority. The plan shall include details relating to how local residents can report noise complaints, how they will be recorded and how they will be dealt with.

The approved Strategy shall be implemented for the lifetime of the development.

REASON

To ensure the development accords with the requirements of Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy 7.15 of the London Plan (March 2016).

18 NONSC No amplified music

There shall be no amplified music played during any of the activities which take place across the entire application site.

REASON

To ensure the development accords with the requirements of Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy 7.15 of the London Plan (March 2016).

19 DIS2 Access to Buildings for People with Disabilities

Development shall not commence until details of access to building entrances (to include ramped/level approaches, signposting, types and dimensions of door width and lobby openings) to meet the needs of people with disabilities have been submitted to and approved in writing by the Local Planning Authority. Additional information that should be submitted includes:

Access to the pitch should be possible via a continuous pathway and any spectator areas and seating should be accessible to wheelchair users with good sightlines to the pitch.

The gym building Further details in respect of access to welcome area and any reception desk, details of Toilet facilities accessible to older and disabled people, details of Changing facilities for wheelchair users and details of Accessible showering facilities

The approved facilities should be provided prior to the occupation of the development and shall be permanently retained thereafter.

REASON

To ensure that people with disabilities have adequate access to the development in accordance with London Plan (2016) Policies 3.1, 3.8 and 7.2

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to GRANT 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 GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 2	New Community Infrastructure
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
LPP 2.2	(2016) London and the wider metropolitan region
LPP 2.6	(2016) Outer London: vision and strategy
LPP 3.2	(2016) Improving health and addressing health inequalities
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.3	(2016) Sustainable design and construction
LPP 6.9	(2016) Cycling
LPP 7.13	(2016) Safety, security and resilience to emergency
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.2	(2016) An inclusive environment
LPP 7.4	(2016) Local character
LPP 7.8	(2016) Heritage assets and archaeology
DMCI 6	Indoor Sports and Leisure Facilities
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 4	Conservation Areas
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP 3.16	(2016) Protection and enhancement of social infrastructure
LPP 3.19	(2016) Sports Facilities
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.6	(2016) Support for and enhancement of arts, culture, sport and entertainment provision

LPP 5.13	(2016) Sustainable drainage
LPP 5.18	(2016) Construction, excavation and demolition waste
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 7.21	(2016) Trees and woodlands
LPP 7.3	(2016) Designing out crime
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
LPP 8.4	(2016) Monitoring and review

3 170 **LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

4

To manage potential construction noise and vibration issues from works on the existing teaching spaces it is recommended that the works are conducted with a s.61 consent under the Control of Pollution Act 1974.

The development must comply with the guidance in Building Bulletin 93: Acoustic Design in Schools.

5

The proposed development shall have regard for:

- a) 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.
- b) Fixtures, fittings and furnishings, particularly hard materials should be selected to ensure that sound is not adversely reflected. The design of all learning areas should be considerate to the needs of people who are hard of hearing or deaf. Reference should be made to BS 8300:2009+A1:2010, Section 9.1.2, and, BS 223 in selecting an appropriate acoustic absorbency for each surface.
- c) Care should be taken to ensure that the internal decoration achieves a Light Reflectance Value (LRV) difference of at least 30 points between floor and walls, ceiling and walls, including appropriate door to ensure that doors and door furniture can be easily located by people with reduced vision.
- d) Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.
- e) Care must be taken to ensure that overspill and/or other interference from induction

loops in different/adjacent areas does not occur.

f) Flashing beacons/strobe lights linked to the fire alarm should be carefully selected and installed to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

3. CONSIDERATIONS

3.1 Site and Locality

The Site is located at the east end of the Brunel University Campus. It is bound to the west by Kingston Lane, the north and east by Uxbridge Cemetery and the south by a public footpath/bridleway and the University's running track/sports fields beyond. The Site is currently in use as a single full sized rugby pitch.

The site features a bund around the perimeter of the existing grass pitch and consists of the materials excavated in order to facilitate the leveling of the rugby pitch.

The Site is located at the east of the Campus. It is bound to the west by Kingston Lane, the north and east by Uxbridge Cemetery and the south by a public footpath/bridleway and the University's running track/sports fields beyond. The Site is currently in use as a single full sized rugby pitch.

The campus as a whole extends to approximately 78ha and is located approximately 1km (at its closest point) south of Uxbridge town centre.

3.2 Proposed Scheme

The proposed development comprises two key elements - improvements to the existing sports pitch and the construction of a temporary gym facility between the pitch and Kingston Lane. The proposed development has been brought forward following the Brunel Universities association with Ealing Trailfinders who through this collaboration have created a Rugby Sports Programme. The following development is proposed :

(A) Sports Pitch Improvements

The proposed works comprise the installation of an artificial grass pitch (AGP) to replace the existing grass surface. This will accommodate a full sized World Rugby pitch sized at 120 x 78m plus 2 Technical Dugout Recessed areas. The existing pitch benefits from existing floodlights, which will be re-used, with perimeter fencing of 1.25m proposed around the perimeter. It is proposed to install new hard standing areas adjoining the AGP perimeter complete with associated porous asphalt surfacing for pedestrian access, vehicular maintenance and emergency access.

In line with the wider Brunel University Sports Park, the pitch would also be available for public use.

(B) Temporary Gym Facility

It is proposed to erect a temporary building to house gym facilities for the exclusive use of Ealing Trailfinders as part of the educational partnership. This would be a circa 20m (span width) x 60m (long) x 3m (eave height) thermo-insulated (air-filled roof) building. No utilities other than electrical power for lighting are required. Given the bespoke specialist nature of the facility, which required trained supervision, the temporary gym will not offer wider University or public access. It will form part of the University's estate (not a separate

planning unit).

It is proposed that the temporary gym will be in place for a period of up to five years. During this time, Brunel University will continue to develop its new Campus Masterplan (through detailed discussions with London Borough of Hillingdon), and it is expected that prior to the end of the temporary permission, the gym will relocate to a dedicated facility - either of permanent construction (subject to planning permission) or elsewhere within the Estate.

The location sits between the upgraded rugby pitch and the pedestrian crossing on Kingston Lane, which is the primary access route to the wider Brunel University campus and adjacent to an existing Bus Stop . Whilst it is noted that there are existing gym facilities located on campus, there would be a number of issues with the additional projected students using these facilities - particularly in terms of physical capacity (i.e. up to 600 new users requiring bespoke training).

3.3 Relevant Planning History

532/PRC/2020/34 Brunel University Kingston Lane Hillingdon
Sports pitch improvements and temporary gym building

Decision:

Comment on Relevant Planning History

No relevant planning history, although the wider campus has an extensive planning history

4. Planning Policies and Standards

London Borough of Hillingdon Development Plan (from 6th April 2020)

1.1 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

1.2 The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - Development Management Policies (2020)
The Local Plan: Part 2 - Site Allocations and Designations (2020)
West London Waste Plan (2015)
The London Plan - Consolidated With Alterations (2016)

1.3 The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

1.4 Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less

significant the unresolved objections, the greater the weight that may be given); and
(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

1.5 The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019.

1.6 The Mayor has considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required. These are set out at Annex 1 of the response, however the letter does also state that if the Mayor can suggest alternative changes to policies that would address the concerns raised, these would also be considered.

1.7 More limited weight should be attached to draft London Plan policies where the Secretary of State has directed modifications or where they relate to concerns raised within the letter. Greater weight may be attached to policies that are not subject to modifications from the Secretary of State or that do not relate to issues raised in the letter.

UDP / LDF Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.CI1 (2012) Community Infrastructure Provision
- PT1.CI2 (2012) Leisure and Recreation
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM11 (2012) Sustainable Waste Management
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM5 (2012) Sport and Leisure
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.HE1 (2012) Heritage

Part 2 Policies:

- DMCI 1 Retention of Existing Community Sport and Education Facilities

DMCI 2	New Community Infrastructure
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
LPP 2.2	(2016) London and the wider metropolitan region
LPP 2.6	(2016) Outer London: vision and strategy
LPP 3.2	(2016) Improving health and addressing health inequalities
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.3	(2016) Sustainable design and construction
LPP 6.9	(2016) Cycling
LPP 7.13	(2016) Safety, security and resilience to emergency
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.2	(2016) An inclusive environment
LPP 7.4	(2016) Local character
LPP 7.8	(2016) Heritage assets and archaeology
DMCI 6	Indoor Sports and Leisure Facilities
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 4	Conservation Areas
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP 3.16	(2016) Protection and enhancement of social infrastructure
LPP 3.19	(2016) Sports Facilities
LPP 3.9	(2016) Mixed and Balanced Communities

- LPP 4.6 (2016) Support for and enhancement of arts, culture, sport and entertainment provision
- LPP 5.13 (2016) Sustainable drainage
- LPP 5.18 (2016) Construction, excavation and demolition waste
- LPP 5.2 (2016) Minimising Carbon Dioxide Emissions
- LPP 6.10 (2016) Walking
- LPP 6.13 (2016) Parking
- LPP 7.21 (2016) Trees and woodlands
- LPP 7.3 (2016) Designing out crime
- LPP 7.5 (2016) Public realm
- LPP 7.6 (2016) Architecture
- LPP 8.2 (2016) Planning obligations
- LPP 8.3 (2016) Community infrastructure levy
- LPP 8.4 (2016) Monitoring and review

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **28th September 2020**

5.2 Site Notice Expiry Date:- **28th September 2020**

6. Consultations

External Consultees

18 neighbouring properties were consulted by letter and a site notice was displayed outside of the site. The application was also advertised within the local press. All methods of consultation expired 28-09-20 and no responses were received.

TRANSPORT FOR LONDON

Proposal: "Upgrade of existing sports pitch to provide World Rugby Compliant 3G Artificial Grass Pitch with associated perimeter fencing and technical dugout recessed areas, erection of temporary gym facility, and associated works".

Thank you for consulting TfL on this application. After reviewing the submitted documents, it is understood that the temporary gym will be for a period of up to 5 years. It is also understood that a wider Master Planning exercise will be underway relating to the whole Campus during this time.

TfL's comments this application are as follows:

Healthy Streets

While noting that there is only one proposed car parking space on site it is a material consideration that the 2088 spaces on the Campus are available for students, staff, and spectators. It is therefore inappropriate to describe and consider that this is as a car-free development that satisfies Healthy Streets requirements.

Figure 4-2 (Vehicular Parking Connectivity) illustrates the main routes to the Campus car parks in the Campus. As a minimum it is suggested that these are reviewed now to identify any pedestrian and cycling issues that need to be addressed and improved. The route from the northbound bus

stop (HD) should also be included in this assessment.

As a minimum we would like to see the routes in Figure 4.2 (and the route from bus stop HD) assessed to identify pedestrian and cycling issues that the development proposals can respond to.
Vision Zero

Section 1.4.6 of the Transport Statement states that "the Proposed Development will assist with achieving the Vision Zero target, with appropriate measures being taken to ensure the safety of all users of the site or the nearby highway network".

As no specific measures are proposed it is not clear what this relates to and therefore how Vision Zero has been considered and addressed.

Further work should be undertaken to clarify what proposals are being referred to and how they will contribute to VZ objectives.

Trip Generation

In the absence of specific TRICS sites either new surveys or investigation of similar sites should be undertaken before a first principles approach is adopted. The site is currently in use so existing site users can and should be surveyed. As this is a partnership with Ealing Trail-finders we would also suggest gathering information from their Ealing operations to inform this development.

While the site itself has a PTAL of 3 this drops down to a score of 1b very quickly, which covers the bulk of the Campus area where the car parking is located. This would seem to imply that car use would be more likely at this location. Mode share should relate to the main mode used for trips associated with the facilities, not simply the last leg from the adjacent Campus.

As this is for a temporary facility there is also the issue of continuity of demand. If the proposals are implemented in order to satisfy expansion plans this raises questions about what will happen to this demand at the end of the temporary period.

Further work should be undertaken to complete the trip generation work so that for each on-site activity (training session, rugby matches, Community and any other potential uses) there is an explanation of their trip volumes, timings, mode share and frequency.

Given the adjacent car parking availability further evidence should be presented to support and justify why sustainable travel choices can be expected and delivered as part of the Campus Travel Plan. Proposals to manage vehicular based demand should be explained and formalised as part of the Travel Plan.

Details of how and where the created demand for these facilities will go at the end of the temporary period should be detailed.

Vehicular Access

Access to the site is from Kingston Lane.

TfL would like to see the access improved to remove the need for left turning vehicles to manoeuvre into the opposing carriageway in order to enter the site.

Car Parking

The Blue Badge space should be provided in accordance with the design guidance provided in BS8300. Vol. 1

Cycle Parking

The proposed cycle provision only relates to the temporary Gym facilities. As the improved pitch will

remain be open to the public and may see increased usage as a result of the proposals we would like to see provision extended to cover this as well.

If the students / staff are expected to be based on the Campus evidence should be provided that there are compliant levels of cycle parking available there in appropriate locations to meet existing and anticipated demand from this development.

Consideration should be given to extending cycle parking to cover the upgraded pitch as well as the temporary Gym.

Travel Plan (TP)

Brunel University currently operate a Travel Plan for the entire University which includes the existing Sports Centre uses and which has received 'Gold Status' from WestTrans. As such no separate TP has been produced as it is stated that it will be sufficient to implement the existing TP.

However, as these proposals represent a change to the existing situation and the trip generation / mode share not properly established the TP will need to be appropriately updated and amended accordingly

The existing TP should be updated to reflect the proposed changes to existing activity and submitted for approval, with proposed measures secured appropriately.

Wider Master planning works

As part of the wider Masterplan work London Buses would like to be involved to explore opportunities to further improve the bus network.

To summarise, for the development to be acceptable in strategic transport terms the above bullet points should be addressed.

GLA

Context

1 On 14 September 2020, the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Intend to Publish London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the 2008 Order:

Development

(a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and
(b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.

3 Once Hillingdon Council has resolved to determine the application, it is required to refer it back to

the Mayor for his decision as to whether to direct refusal or allow the Council to determine it itself. In this case, the Council need not refer the application back to the Mayor if it resolves to refuse permission.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 1.2-hectare site forms part of the Brunel University Campus and is bound by Kingston Lane to the west, the Celadine Route and the university's running track to south and Hillingdon & Uxbridge Cemetery to the east and north. The site is largely enclosed by hedgerow with restricted views into the site. This site is currently in use as a single full-sized rugby pitch.

6 The area immediately north of the site is designated within the Hillingdon Local Plan as a Nature Conservation Site of Borough Grade II of Local Importance. Hillingdon Village Conservation Area is located immediately east of the site. There are a number of Grade II Listed Buildings located between 220 and 450 metres of the site which include: The Red Lion Public House, A W Smith and Sons Conifer Cafe, The Cottage Hotel, Chapels in Hillingdon Uxbridge Cemetery, the Lecture Theatre Block, Brunel University and the North Wing of the Bishopshalt Grammar School.

7 The nearest section of the Transport for London Road Network (TLRN) is the A40 approximately 3.5 kilometres from the site. Uxbridge London Underground station and West Drayton station, which is served by TfL Rail services, are located 2 kilometres from the site. The site is served by 4 bus routes, whilst the nearest Quietway is located 2 kilometres from the site. The site entrance records a public transport access level (PTAL) of 3 on a scale of 0 to 6b, where 6b is highest.

Details of the proposal

8 The application seeks to upgrade the existing sports pitch to provide a 3G artificial grass pitch, recessed dugouts and erection of a temporary gym facility of 1,200 sq.m. This would be required for a period of up to five years which would allow the university time to develop a masterplan, providing a comprehensive approach to planning for the wider campus and ensure that educational needs are met.

9 The university has entered into a partnership with Ealing Trailfinders Rugby Club to offer a Rugby Sports Scholarship, which will offer students assistance with university tuition and accommodation fees in conjunction with developing their rugby performance. The aim of the partnership is to create a comprehensive sports and education programme for talented rugby players, allowing students to combine top-level rugby training with academic studies. Students would have the opportunity to join Ealing Trailfinders Academy and train with the professional team. This programme has already begun with the first 50 students enrolling in 2019, and a further 150 expected in September 2020. It is intended that up to 500 students per year would eventually be enrolled on the programme.

Case history

10 A pre-application in principle meeting was held on 19 May 2020 which concluded that GLA officers welcomed the university's aspirations to expand its sports and education programme, but that a case for Very Special Circumstances would be required in support of any planning application. The applicant was encouraged to seek a full pre-app meeting prior to submission of an application, however, there has been no pre-application discussion with the GLA with regards to the scheme.

Strategic planning issues and relevant policies and guidance

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of the Local Plan: Part 1 Strategic Policies (adopted 2012), the Local Plan Part 2 Site Allocations and Designations and Policies Map (2020) and the 2016 London Plan (consolidated with alterations since 2011).

12 The following are also relevant material considerations:

- The National Planning Policy Framework (2019);
- National Planning Practice Guidance;
- Mayor's Intend to Publish London Plan (December 2019) which should be taken into account on the basis explained in the NPPF;

13 On 13 March 2020, the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.

14 The relevant issues and corresponding policies are as follows:

- Green Belt London Plan, Intend to Publish London Plan;
- Transport London Plan; Intend to Publish London Plan; Transport Strategy; Mayor's Transport Strategy
- Sustainable development London Plan; Intend to Publish London Plan

Principle of development

15 The site is currently in use as a single full-sized grassed rugby pitch and is largely enclosed by hedgerow. There are no buildings on the site.

Green Belt

16 London Plan Policy 7.17 and Policy G3 of the Intend to Publish London Plan seek to protect Green Belt from inappropriate development in accordance with the National Planning Policy Framework (NPPF). Development proposals that would harm Green Belt should be refused.

17 The NPPF is clear at paragraph 143, that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 144 states that when considering applications on the Green Belt, substantial weight should be given to any harm to Green Belt and that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

18 Paragraph 145 then sets out the limited exceptions to this:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan; and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

19 In assessing the applicability of exception (b), the upgraded sports pitch would meet this

exception, but the provision of a temporary gym facility does not constitute appropriate facilities for outdoor sport and would not preserve the openness of the Green Belt.

20 The applicant has provided a views assessment which demonstrates that the development would be marginally visible above the hedgerow on Kingston Lane to the west. Hedgerows to the north and east of the site largely enclose the site and would likely result in the building not being visible. Views from the south of the site are already compromised by the existing fencing and as such, the proposed building would not cause any additional adverse impact on the view as set out in the Green Belt assessment that accompanies the application.

21 The applicant has set out very special circumstances as follows:

1. There is an economic and social need for the development;
2. There are no reasonable alternative means of meeting this need;
3. The proposed development is deliverable and will realise significant public benefits; and
4. The scale and severity of harm to the Green Belt will be limited.

Economic and social need

22 Taking each of these in turn, the applicant sets out the role of higher education in the UK's economic success; providing high levels of employment, direct and indirect impacts in terms of consumer spending and in light of their scale of operations, considered as 'anchor institutions' that are unlikely to relocate. In addition, there is likely to be increased pressure on the university's campus and associated facilities with student numbers expected to increase over the next 20 years as a result of higher populations of those aged 18-20 years old. The applicant identifies a number of provisions within the National Planning Policy Framework in support of this approach; paragraph 91 requires planning decisions to enable and support healthy lifestyles, whilst paragraph 96 highlights the importance of health and wellbeing and the opportunities for communities to access sport. Policies S1 and S5 of the Intend to Publish London Plan and policies 3.16 and 3.19 of the London Plan seek to improve, enhance and support the provision of social infrastructure, specifically sports facilities.

23 The applicant states that there is a current urgent need to provide these facilities with demand exceeding supply. Over 4,000 students participate in some form of sport and physical activity each week, across 50 sports clubs or as members of the existing campus gym with significant capacity issues identified. The performance programme currently has 62 players of the 121 members of the university's rugby club. This is expected to rise to approximately 500 players, or 4% of the total university's student population and is anticipated to realise a 10% increase in the number of students accessing the sports facilities.

Alternative means of meeting need

24 The application seeks temporary permission for the gym building for a period of up to five years. This would allow the university to develop a comprehensive masterplan for the campus in its entirety. The applicant states that this will be developed through detailed discussions with both the London Borough of Hillingdon and the Greater London Authority which is welcomed. However, in the intervening period, it is important that the needs of the university can be accommodated. The provision of the temporary gym building is considered location-specific, adjacent to the existing rugby pitch and would best facilitate the rugby programme. In addition, the university campus is entirely within the Green Belt, and as such alternative sites are not available.

25 The proposed location of the temporary gym building is accessible both on foot and by public transport with a bus route located adjacent. The applicant states that whilst there are other existing sports facilities on the campus, they would not provide sufficient capacity required. Furthermore, other areas within the campus were not considered suitable given the proximity to existing buildings, areas within flood risk and impacts with regards to noise and light pollution.

Significant public benefits

26 It is understood that the proposed facilities would not be open to the public, restricted for use solely by students. However, the applicant states, that the proposals would support the wider university programme in attracting students and deliver on national economic and social policy objectives relating to economic development and wellbeing. Other sporting facilities are used by members of the public, thus demonstrating that needs of those in the wider community are met through university provision. Notwithstanding, the proposed artificial 3G pitch will also be made available for use by members of the public.

27 The temporary gym building would alleviate pressure on existing facilities freeing up capacity for other students, staff and members of the public. The applicant has also provided details on how access to rugby within the university is being developed to include;

- apprenticeships;
- supporting players in the wider south east who are under-16 and under-18, providing them with a professional level of coaching and support in helping them obtain a place at the university;
- participation of the Brunel Trailfinders Rugby Club at the Rugby Football Union Leagues, providing match activity for those on the apprenticeship programme;
- facilitating Middlesex County Rugby Football Union events;
- providing routes towards higher education for talented young athletes via the Inner-City Educational Support Programme and;
- providing training facilities and matches for state and independent schools throughout London and the south east of England.

Level of harm to the Green Belt

28 The applicant has provided a Green Belt Study that has been undertaken to assist with previous masterplan discussions. This assesses the contribution the wider campus, including the area subject to this application, makes to the purposes of including land within the Green Belt. This site is considered as making only a limited contribution to the Green Belt and would not have an adverse impact on the functionality of the remainder of the Green Belt as a whole.

29 The siting of the temporary gym building is such that it is in the least obtrusive location on the site, immediately adjacent to Kingston Lane, largely screened by existing hedgerow and as far away as possible from the wider Green Belt to the west which is more open in character. The applicant has also provided information to demonstrate that the building is no larger than is necessary to accommodate the level of need over the five-year period and that tree planting can be incorporated to reduce impacts further. In addition, the applicant states that given the temporary nature of the building, its impacts are reversible and has agreed that this can be secured by condition.

Analysis and conclusion

30 The Very Special Circumstances set out above identify that there is a genuine need for the provision of a gym facility on the campus with the number of students enrolled in the performance programme expected to rise significantly from 62 to 500. Its location on the campus has taken account of accessibility by foot and public transport, proximity to other buildings, impacts of noise and light pollution, and flood risk. The applicant has confirmed that the 3G pitch would be made available for public use, and that despite the gym facility being used solely for students, this would free up other facilities on the campus for public use. This is considered a public benefit of the development. Notwithstanding, the applicant has also provided details of how the development would increase participation in rugby by way of apprenticeships, alternative routes towards higher education for young athletes and other measures. In addition, the applicant has demonstrated that the building is no larger than is required and is sited such that it reduces the impact on the openness of the Green Belt to the east.

31 Without prejudice to GLA officers' views set out above, it should be a condition on any planning permission that all temporary buildings on the site are removed on expiration of the temporary

planning permission. The need to safeguard the Green Belt against enduring harm is critical to the acceptability of the proposal; therefore, the Council must ensure that measures are in place to return the land to its existing or better condition

Future masterplan

32 It is understood that wider Masterplan work for the Campus is underway and GLA officers and TfL would welcome discussions on its development.

Historic environment

33 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and in relation to conservation areas, special attention must be paid to 'the desirability of preserving or enhancing the character or appearance of that area'.

34 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and, the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. London Plan Policy 7.8 and Intend to Publish London Plan Policy HC1 state that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.

35 The site is not within a designated conservation area and there are no listed buildings in the immediate surrounding area. Hillingdon Village Conservation Area is located immediately east of the site. There are a number of Grade II Listed Buildings located between 220 and 450 metres of the site which include: The Red Lion Public House, A. W. Smith and Sons Conifer Cafe, The Cottage Hotel, Chapels in Hillingdon Uxbridge Cemetery, the Lecture Theatre Block, Brunel University and the North Wing of the Bishopshalt Grammar School.

36 Having regard to the statutory duties in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the NPPF in relation to listed buildings and non-designated heritage assets, GLA officers consider that the proposed use of the site for a 3G artificial grass pitch and provision of a temporary gym building would not cause any harm to the significance of the surrounding heritage assets, as due to the distance to heritage assets and the limited scale of the development there would be no adverse impact on the setting of these assets.

Energy

37 The applicant should follow the energy hierarchy when designing the temporary gym facility and outline the building services provided to the gym and the predicted energy demands.

38 If the gym has a significant electrical demand, the applicant should consider the potential for energy efficiency measures and renewable energy generation e.g. roof mounted photovoltaic panels. If the gym will be heated, cooled or provided with domestic hot water, the applicant should submit an energy statement following the GLA Energy Assessment Guidance 2018, which sets out the information that should be provided within the energy assessment to be submitted prior to Stage 2.

Flood risk and drainage

39 The site is located in Flood Zone 1. The risk of flooding has been considered from a range of sources; when mitigation measures are considered, the residual flood risk is low. The approach to flood risk management complies with London Plan Policy 5.12 and Intend to Publish London Plan Policy SI12.

40 The surface water drainage strategy for the proposed development does not comply with London Plan Policy 5.13 and Intend to Publish London Plan Policy SI13, as it does not give appropriate regard to the drainage hierarchy and greenfield run-of rate with regard to the temporary gym facility. Further information should be provided demonstrating how SuDS measures at the top of the drainage hierarchy will be included in the development and how they will be maintained, and how greenfield run-off rate will be achieved. Full, technical comments will be provided to the applicant.

Transport

Healthy Streets and vision zero

41 The proposals include provision of one car parking space, however given that this is part of a wider site, the 2,088 extant parking spaces available on campus are taken into account as a material consideration. As such, TfL do not consider the proposed development as car-free. Further evidence should be provided, and further clarity required to justify the sustainable travel choices that can be delivered as part of the Campus Travel Plan, and the appropriate measures that are proposed and how they would contribute to Vision Zero objectives in order to comply with Policy T2 of the Intend to Publish London Plan.

Trip generation and impact assessment

42 Further work should be undertaken to complete the trip generation work so that for each on-site activity (training session, rugby matches, community and any other potential uses) there is an explanation of their trip volumes, timings, mode share and frequency. This would enable a full assessment of the development's impacts on the local public transport, walking and cycling networks against Policy T4 of the Intend to Publish London Plan.

43 Proposals to manage vehicular based demand should be explained and formalised as part of the Travel Plan. Details of how and where the created demand for these facilities will go at the end of the temporary period should be explained.

Cycle parking

44 While the proposals for the temporary gym facility comply with Intend to Publish London Plan Policy T5, it is noted that the upgraded pitch is expected to see increased wider community usage. For this reason, consideration should be given to extending cycle parking to cover this use as well. Proposed provision should respond to the existing and anticipated mode share.

Management plans

45 Changes to the existing Campus Travel Plan have not been proposed. However, this should be updated to reflect these proposals to ensure compliance with Policy T4 of the Intend to Publish London Plan, and appropriately secured.

46 Whilst it is not anticipated that there will be many servicing movements associated with the site, the construction traffic associated with the site upgrade (and potential restoration at the end of 5 years) has not been detailed. This should be provided within a Construction Logistics Plan, prepared in line with TfL's guidance and secured by condition.

Local planning authority's position

47 Hillingdon Council planning officers are currently assessing the application.

Legal considerations

48 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. In this case, the Council need not refer the application back to the Mayor if it resolves to refuse permission. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

49 There are no financial considerations at this stage.

Conclusion

50 London Plan and Intend to Publish London Plan policies on the principle of development; natural environment; sustainable development; historic environment and transport are relevant to this application. The application does not currently fully comply with these policies; however, resolution of the below issues could lead to the scheme becoming policy compliant.

- Principle of development: The site is located on land within the Green Belt and is currently in use as a grassed full-sized rugby pitch. The applicant has provided Very Special Circumstances which set out the economic and social need for the development, the public benefits that would be delivered, the scale of harm to the Green Belt and that there are no reasonable alternative means of meeting the demand. These matters, when considered collectively along with the temporary nature of the development, outweigh the harm to the Green Belt.

- Sustainable infrastructure: The approach to flood risk management complies with London Plan Policy 5.12 and Intend to Publish London Plan Policy SI12. The surface water drainage strategy does not give appropriate regard to the drainage hierarchy and greenfield run-of rate and does not comply with London Plan Policy 5.13 and Intend to Publish London Plan Policy SI13.

Further information should be provided regarding the SuDS measures on the site.

- Transport: Further work is required regarding trip generation to enable a full assessment of the development's impacts on the local public transport, walking and cycling networks. The Travel Plan should include proposals to manage vehicular based demand, and the Campus Travel Plan should be revised. A CLP should be provided that considers construction traffic and the site's restoration at the end of 5 years.

SPORT ENGLAND

Sport England - Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (in particular Para. 97), and against its own playing fields policy, which states:

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

all or any part of a playing field, or
land which has been used as a playing field and remains undeveloped, or

land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

The Proposal and Impact on Playing Field

The application proposes to construct a Rugby Artificial Grass Pitch (AGP) where the existing lit natural turf grass pitch is marked and a temporary gym facility on the playing field.

Assessment against Sport England Policy

The London Borough of Hillingdon does not have a Playing Pitch Strategy, the RFU have not provided any feedback regarding the proposal and the submitted documentation is relatively silent on the strategic need for the development therefore Sport England is not clear if there is a strategic need for the proposal. The lack of strategic need normally raises concerns on the long-term sustainability of an AGP (as a sink fund would need to be in place, normally generated from community use fees, to fund maintenance and replacement of the carpet at the end of its life) and the impact on surrounding sites which may lose demand to the proposed AGP thereby bringing those sites sustainability into question. In this instance, however, the submitted documentation has indicated that the development would provide facilities for both the University and Ealing Trailfinders consequently it could be suggested that there is some demand for the proposed development.

Furthermore, the proposed AGP would directly replace the existing natural grass rugby pitch on the site. It is not clear if there is an issue with pitch quality at the site but the proposed AGP would allow more play on the site without having to worry about cancelling sessions due to ground conditions. The use of the existing playing field is relatively constrained to the existing rugby pitch due to the location of the sports lighting and size of the site therefore the impact of the proposed AGP preventing other sports on the site now or in the future is limited. As a result, on balance, Sport England is willing to take a pragmatic approach in this instance and accept that the increased play on a fairly constrained playing field would be of benefit to sport provided that the proposed AGP is designed and constructed in line with World Rugby Guidance as stated in the Design and Access Statement, the long-term sustainability can be secured and the site is available for community use as per the hours stated in the Design & Access Statement.

Similarly, there is no discussion of strategic need for the proposed temporary gym facility however this would complement the proposed AGP. Recent aerial photographs suggest that the playing field area lost to the proposed gym (and parking/access) has not been utilised for formal sport so it has likely to have been used for informal, recreation and/or training purposes. All this use could be relocated to the proposed AGP as there would be less impact on wear and tear compared to a natural turf pitch. In addition, since this element of the proposal is temporary then this area of playing field would come back into use once the building is removed. Sport England would add, however, that given the proximity of the building to the proposed AGP, changing rooms to support the proposed AGP could be of some benefit.

Overall, Sport England is willing to accept that the proposal is of sufficient benefit to the development of sport to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Conclusions and Recommendation

Given the above assessment, Sport England does not wish to raise an objection to this application as it is considered to broadly meet exception 5 of the above policy. The absence of an objection is subject to the following condition being attached to the decision notice should the local planning authority be minded to approve the application:

01) Use of the development shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the development hereby permitted and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement.

Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy.

Informative: Guidance on preparing Community Use Agreements is available from Sport England. <http://www.sportengland.org/planningapplications>. For artificial grass pitches it is recommended that you seek guidance from the Rugby Football Union on pitch construction when determining the community use hours the artificial pitch can accommodate.

02) On the expiration of five years from the date of this permission the temporary gym facility and ancillary facilities hereby permitted shall be removed from the site and the playing field reinstated to at least the same condition as it was prior to its temporary loss. The playing field shall be reinstated in the first planting season following the removal of the temporary facilities hereby permitted.

Reason: To ensure that area of playing field is restored to a condition fit for purpose once the facilities are removed and to accord with Development Plan Policy.

Informative: Sport England advises that the applicant engages with a competent sports agronomist prior to the construction of the temporary facilities so that the existing condition of the playing field can be assessed and a specification to restore the playing field can be developed.

If you wish to amend the wording of the recommended conditions, or use another mechanism in lieu of the conditions, 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.

Should the local planning authority be minded to approve this application against the recommendation of Sport England; then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009 the application should be referred to the Secretary of State via the National Planning Casework Unit.

There is a free online resource from Sport England (Use Our School) that offers further guidance and information for local authorities and other education providers on how to make the best use of school facilities for the benefit of the local community. It is especially useful for those who have responsibility within a school for establishing, sustaining and growing community activity on school sites. 'Use Our School' can be accessed here; www.sportengland.org/useourschool

Sport England would also like to be notified of the outcome of the application through the receipt of a copy of the decision notice.

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of

Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

HISTORIC ENGLAND

Thank you for your letter of 3 Sept 2020 regarding the above application. On the basis of the information available to date, in our view you do not need to notify us of this application under the relevant statutory provisions, details of which are enclosed.

If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

GLAAS

Recommend No Archaeological Requirement

THAMES WATER

Waste Comments

Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

MOD

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 03/09/2020.

The applicant is seeking full planning permission for the upgrade of the existing sports pitch to provide World Rugby Compliant 3G Artificial Grass Pitch with associated perimeter fencing and technical dugout recessed areas, erection of temporary gym facility, and associated works

The application site is approximately 3.54km from the centre of the runway at RAF Northolt and occupies the statutory height, technical and birdstrike safeguarding zone surrounding the aerodrome.

After reviewing the documents provided, I can confirm the MOD has no safeguarding objections to this proposal.

I trust this is clear however should you have any questions please do not hesitate to contact me.

HEATHROW SAFEGUARDING

We have now assessed the below application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development. However, we would like to make the following observations:

Landscaping

The development is close to the airport and the landscaping which it includes may attract birds which in turn may create an unacceptable increase in birdstrike hazard. Any such landscaping should, therefore, be carefully designed to minimise its attractiveness to hazardous species of birds.

Your attention is drawn to Advice Note 3, 'Wildlife Hazards' (available at <http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-3-Wildlife-Hazards-2016.pdf>).

Cranes

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes' (available at <http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf>)

NATS

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Internal Consultees

FLOOD AND WATER MANAGEMENT OFFICER:

SSL have produced an FRA and Drainage Strategy Revision 3 dated Nov 2020. The proposals have been revised to control discharge rates to 1.69ls as requested indicated as Q bar for the site, through the provision of additional 53m3 storage for the temporary Gym as well as additional void space for the Pitch and is therefore policy compliant.

PLANNING POLICY

Designations

- Green Belt

Principle of Development

The proposed development involves the replacement of the existing grass surface pitch with an artificial grass pitch to accommodate a rugby pitch, and associated perimeter fencing and hardstanding for pedestrian and vehicular access. The applicant is also seeking permission for a temporary gym building of 1,200sqm for a period of five years.

Provision of sports facilities

The NPPF supports the provision of sports facilities. Part c of paragraph 91 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs - for example through the provision of, among other things, sports facilities. Paragraph 96 also states that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Whilst the proposed gym facility will not be open to members of the public, the artificial grass pitch will be made available to the public and the applicant has stated that the building of the temporary gym facility will free up capacity of other facilities operated by the university for members of the public.

Part B of Policy S5 (Sports and Recreation Facilities) of the Intend to Publish Version of the London Plan states that Development proposals for sports and recreation facilities should: increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling; maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities.

Part C of Policy S5 also states that existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

The applicant is proposing the replace the existing grass surface pitch with an artificial grass pitch to accommodate a rugby pitch and provide a temporary gym facility. This proposal is generally supported by planning policy.

Green Belt

Policy EM2 of the Local Plan: Part One (November 2012) notes that any proposals for development in the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.

The National Planning Policy Framework (NPPF) attaches great importance to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. The NPPF states that once Green Belt boundaries have been defined and local planning authorities are required to positively enhance the beneficial use of the Green Belt. Paragraph 144 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt.

Paragraph 145 of the NPPF (2019) notes a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt unless it meets one of the exceptions. Exceptions relevant to this development are:

- Part b) of paragraph 145 - the provision of appropriate facilities (in connection with the existing use

of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

- Part g) of paragraph 145 - limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- Not have a greater impact on the openness of the Green Belt than the existing development; or
- Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Policy DMEI 4 of the Local Plan: Part Two (2020) notes inappropriate development in the Green Belt will not be permitted unless there are very exceptional circumstances. Extensions and redevelopment of sites will also only be permitted where this would not have a greater impact on the openness of the Green Belt as well as the purposes of including land within it, than the existing development, having regard to:

- the height and bulk of the existing building on site,
- the proportion of the site that is already developed,
- the footprint, distribution and character of the existing buildings on site,
- the relationship of the proposal with any development on the site that is to be retained; and
- the visual amenity and character of the Green Belt.

Part of the proposed development has the potential to be assessed as an exception to Green Belt policy based on the type of development proposed. The artificial playing pitch would be considered an exception as per part b) of paragraph 145 due to its use for outdoor sport. There is also additional hardstanding and perimeter fencing proposed as part of the new playing pitch provision. These elements may have an additional impact on the openness of the Green Belt and the purposes of including land within it which would need be assessed.

The temporary gym building would be a significant development. The applicant has stated that the gym is to be directly associated with the rugby pitches and incorporated in the overall rugby training. Part b) of paragraph 145 states that one exception to the construction of buildings in the Green Belt is the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. The applicant has sought to demonstrate that the temporary gym is to be provided in connection to the rugby pitch however given its scale and consequent impact on the purposes of Green Belt, it is the Council's view that the gym does not fall within the exceptions set out in paragraph 145 and consequently would therefore be inappropriate development. Very special circumstances therefore need to be demonstrated to justify the provision of the gym in this location. The applicant's proposed very special circumstances are reviewed in detail below.

The applicant also needs to demonstrate that the facilities will preserve the openness of the Green Belt. If the applicant is unable to do this, they must again demonstrate very special circumstances for the scale and massing of the proposed gym given the significant impact this could have on the openness of the Green Belt in this location. The applicant has submitted a local views assessment which demonstrates that there will be an impact on views from the west of the site, no additional impact on views from the south of the site due to existing fencing already in place, and no impact on views from the east and north of the site due to hedgerows which enclose the site.

Very Special Circumstances

As stated above, the provision of the artificial rugby pitch would fall within exception b) of paragraph 145 of the NPPF however it is not clearly demonstrated that the temporary gym facility would fall

within exception b) and that it would preserve the openness of the Green Belt. The applicant has provided a case to demonstrate that very special circumstances exist which outweigh the harm to the Green Belt.

A) Economic and Social Need and Urgent Requirement for Facilities

The applicant has highlighted the importance of the higher education sector in delivering on economic and social policy objectives, both locally and to the wider UK. The applicant also notes that as an existing and successful higher education/economic asset it is well placed to deliver improvement and growth necessary to satisfy economic and social needs. The applicant highlights research which indicates that engagement in sports at university leads to improved graduate employability and that there is a direct link between sports facility provision and the future economic performance of graduates.

Student numbers are rising generally and the applicant has stated that there is an urgent need to provide facilities. The applicant has stated that demand for the current sports facilities at the university outstrips supply with over 4,000 students participating in some form of sport or physical activity each week either in one of the existing sports clubs or as members of the existing campus gym. A survey of the existing gym facilities undertaken by the applicant demonstrated significant capacity issues, with the quantity and access to the types of strength and conditioning equipment required by the rugby programme being highlighted as key issues. The applicant highlights that growth of the rugby programme will deliver a 10% increase in the number of students wishing to access the sports facilities and that this demand is not capable of being met with the existing infrastructure in terms of gym capacity and the playing demands on the current grass sports pitches.

The applicant has also highlighted that the provision of sports facilities are supported by the NPPF and London Plan.

B) Alternative Means of Meeting Need

The applicant is seeking permission for a temporary gym facility for a period of 5 years, which they have stated will allow the university time to prepare a new masterplan for the entire campus to ensure that all educational need requirements can be comprehensively planned for. The applicant intends to prepare this through detailed discussions with LB Hillingdon and the GLA. The applicant is seeking permission for the temporary gym facility to ensure needs are met in the short-term.

The applicant has stated that the gym needs to be located close to the rugby pitch because it is intended to support the rugby programme. The applicant has also stated that there is no capacity for growth within the university's existing sports facilities or other locations across the campus. The applicant has stated that other locations considered were also inappropriate due to reasons of noise, proximity to existing buildings, locations within areas of flood risk and the size of the proposed development.

The entire university campus lies within the Green Belt and so it is likely that similar issues regarding impact on the openness of the Green Belt are likely to be found on other sites within the university's campus. The Council would expect additional evidence to demonstrate which other sites were considered and why they were unsuitable but the applicant's rationale for seeking to locate the gym close to the rugby pitch is accepted.

The site itself is accessible by public transport and walking which is positive and will help minimise additional vehicle activity in and around the Green Belt location.

C) Public Benefits

The applicant has stated that the temporary gym facility will be accessible only to students, however, they point out that the university's existing facilities already attract a lot of public use and that the temporary gym will alleviate capacity challenges within the existing sports facilities. This will allow the University to offer more opportunities to students, staff and the local community to participate in sport and physical activity.

They state that by supporting the wider university programme, the proposed development will also deliver on economic and social policy objectives relating to economic development and health and well-being.

The artificial grass pitch will also be made available to the public.

The applicant has stated that the university will be supporting access to rugby within the university by working with clubs/organisations outside of the university. This will be provided through the following ways:

- An apprenticeship programme to provide a non-academic pathway combining rugby and personal development towards employment. Training and matches would take place at the university;
- Allowing participation of the Brunel Trailfinders Rugby Club in the Rugby Football Union (RFU) which will provide match activity to players on the apprenticeship programme alongside other Brunel students;
- Working with the Middlesex County Constituent Body RFU to support and deliver rugby for under 18 and under 20 programmes, many of the events for which will be delivered at the proposed facility
- Through an Inner City Educational Support Programme which is being created to provide routes towards higher education for talented young athletes. Financial bursaries will support students to study at Brunel and other select colleges;
- Through links with schools throughout London and the South East of England, the Trailfinders Academy will support the use of the proposed facilities for training and matches for these schools throughout the year.

D) Level of Harm to the Green Belt

The applicant has provided a Green Belt study undertaken in 2015 which assesses the contribution that the Brunel University campus as a whole makes to the purposes of the Green Belt. It concludes that the land within which the proposed development sits make a limited contribution only and that allowing development on this land would not be likely to have an adverse impact on the functionality of the remainder of the Green Belt as a whole.

The applicant has also submitted a local views assessment which demonstrates that there will be an impact on views from the west of the site, no additional impact on views from the south of the site due to existing fencing already in place, and no impact on views from the east and north of the site due to hedgerows which enclose the site. The applicant has also stated that there is scope for additional landscaping for the new temporary facility that can be incorporated to help minimise the appearance in the landscape.

Finally, the applicant notes that the temporary nature of the facility means that its impacts are reversible. The applicant has agreed that after five years the land will be returned to its original or equivalent or improved states of openness and that they are agreeable for this to be secured by planning condition.

Conclusion

Taking into account all of the above evidence, it is accepted that the applicant has demonstrated that very special circumstances do exist for the proposed development. There is a significant benefit in terms of the proposed development helping to facilitate access to higher education and helping to

facilitate apprenticeship programmes to provide non-academic pathways to employment. There is also a benefit to the local community as the proposed gym facility is expected to alleviate capacity on existing campus facilities which are used by members of the public as well as university staff and students. The artificial grass pitch will also be available for public use.

The importance of the university in general to the local and wider economy is well established. The applicant has highlighted a need for additional facilities to cope with increasing student numbers and has highlighted the positive impact sports facilities can have on both health and well-being and the future employability of graduates.

As the entire university campus lies within the Green Belt, reasonable alternative sites may encounter similar issues in terms of the impact of the gym facility on the openness of the Green Belt and the purposes of including land within it. The applicant has sought to demonstrate that the impact on the Green Belt will be limited and has submitted a views assessment which shows a minimal impact on local views. The temporary nature of the proposed gym facility means that any impact will at least be temporary and nature and use of planning conditions to ensure the land is returned to its original or equivalent state is recommended.

HIGHWAYS

Change of an existing sports field to a 3D pitch, fencing and erection of a temporary gym facility. The site is located along Kingston Road which has double yellow line restrictions along its entire length, resulting in no vehicle parking opportunities. There are no existing parking facilities, 12 cycle parking spaces are proposed and one disabled parking space. There is an existing access point which will be upgraded. The access is wide enough to accommodate all size of vehicles and swept path analysis has been provided. There will be minimal vehicle movements associated with the site, therefore it is not envisaged that will be significant, if any conflict issues between pedestrians, vehicles and cyclists. This is solely for the Rugby club not for wider university or public use, so trips will be contained. There is no parking provided as it will be expected that people will walk, cycle or use public transport to access the site. Parking is bookable at the main campus, less than a five minute walk away which will be utilised for away teams arriving by mini bus for matches. The University already has a well established Travel Plan and a condition should be place on the application that this site should be covered by the Travel Plan document. With the inclusion of this condition, there are no highways objections to this application.

AIR QUALITY

The Proposed Development (land use class D2) is likely to generate approximately 150 two-way trips (gym staff, coaching staff, medical, admin personnel and the players themselves) each time there is a training session on the pitch, and 200-300 two-way trips each time a rugby match is undertaken, during the day, afternoons/ evenings and at weekends via pre-arranged and structured community access.

The largest number of trips at any one time at the site are likely to be when a rugby game is scheduled. This additional increase in traffic emissions are likely to impact the Uxbridge Focus Area which will add to current exceedances of the nitrogen dioxide annual mean limit value within this sensitive area.

The proposal is air quality neutral in terms of traffic emissions. As per the London Plan, developments need to be neutral as minimum and contribute actively to reduce pollution in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

DAMAGE COST AND MITIGATION MEASURES

The trip generation associated with the operation of the upgraded facilities will generate in average 0.2 tonnes of NOx and 0.01 tonnes of PM2.5 per annum which equates to a damage cost of £76, 801. Assuming the travel plan in place achieves a 10% traffic reduction and that modal shift actions by users achieve a further 15% reduction, the residual damage cost is £57, 601.

Therefore, a section 106 agreement with the LAP of £57,601 will have to be paid for Hillingdon to address the resulting increase in air pollution emissions associated with this additional proposed development. As per standard practice, the required amount will be used to continue to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

Alternatively, the equivalent amount is to be allocated by the applicant towards further improvements of the existing Travel Plan. This is to be secured via a bond and Condition Travel Plan below.

2 Reason for Refusal (if objecting)

N/A

3 Observations

Two Air Quality conditions are required to both further develop the existing University's Travel Plan to make it more effective and measurable and manage the construction fleet as per Mayor requirements. See text below.

Condition Air Quality - Addendum to the Existing Travel Plan

1. No construction works shall be undertaken until a clear and effective addendum to the existing Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The addendum shall include, but not be restricted to:

- a) Additional measures to foster the use of electric vehicles,
- b) Provision of an electric vehicle fast charging bay. This is to be implemented as part of the proposal with the minimum requirements as per the London Plan,
- c) Provision of specific measures that encourage modal shift to sustainable ways of transport during the sport events. These may include but not be restricted to display of information on digital boards before and during the game encouraging attendants to use green ways of transport; on-line selling tickets with information on how to access the place via walking, cycling and or public transport, etc;
- d) A clear and effective strategy, aligned with the Travel Plan, to measure the effectiveness of the travel plan measures over a period of 5 years. Measures to support and encourage modal shift, will include but be not restricted to incentives for residents to use public transport to reduce their car ownership. The measures in the agreed scheme shall be maintained throughout the life of the development.

Reason -

As the application site is within an Air Quality Management Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), London Plan Policy 7.14, Mayor's Intent to Publish London Plan Policy SI1, and paragraph 170 of the National Planning Policy Framework (2019).

Conditions - Reducing Emissions from Demolition and Construction

A No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

Reason: Compliance with London Plan Policy 7.14 and in accordance with Mayor of London "The Control of Dust and Emissions from Construction and demolition (or any successor document).

B Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019) All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>."

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy

Context

The proposed development is within an Air Quality Management Area and affect an identified Air Quality Focus Area i.e. the Uxbridge Focus Area. Air Quality Focus Areas are defined by the GLA as areas already suffering from poor air quality where prioritisation of improvements is required. This is supported by:

Local Plan Part 2 Policy DME1 14

A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) Development proposals should, as a minimum:

i) be at least "air quality neutral";

ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and

iii) actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

TREES AND LANDSCAPING

This site is occupied by a rugby pitch, belonging to Brunel University, located to the east of Kingston Lane. Hillingdon Cemetery lies to the north and east of the pitch. Other sports / athletics facilities are situated to the south. The land rises from the Kingston Lane, in the west, from 44.0-45.0 metres to the cemetery in the east at 50.0metre (+/-). It also rises from Kingston Lane (north end 44.0m to the south at 45.0m).

The existing pitch was constructed relatively recently and is situated on an elevated plateau some 3 metres (+/-) above the road. Much of the road boundary is defined by palisade security-type fencing, behind which is a hedge, maintained at approximately 2.5metres along much of the street frontage.

The cemetery boundaries are defined by a 3 metre high dense holly (evergreen) hedge on the east boundary. The north boundary is more open tree-lined edge. Aside from the tall rugby posts, the only visual intrusion above the pitch, is the high mast floodlight poles around the edges. There are no TPO's or Conservation Area designations affecting the site and there is no vegetation, other than the roadside hedge.

COMMENT No trees will be affected by the proposal.

The upgrade of the sports pitch from a natural grass to an artificial grass finish should not have a visual impact from outside the site. It is understood that topsoil (300-450mm) will be removed from the existing pitch and replaced with a similar depth of construction and formation of the synthetic

surface. Compared to the spot heights on the site boundaries (given above) the proposed height of the pitch will vary between 47.05 metres (in the north-west corner) and 48.195 metres (north-east and south-east corners). The floodlight columns will remain.

The main visual impact will be from the temporary gym facility which will be installed between the Kingston Lane boundary and the edge of the rugby pitch on the land which is currently two grass terraces.

SCREENING OPPORTUNITIES A small area of planting is shown on plan, immediately to the north of the gym. It appears that additional tree planting could be provided in the north-west and south-west corners of the site without interfering with the operational / maintenance requirements of the site. There is also space to plant fastigate (upright) trees between the gym building and the roadside hedge.

Further to that, additional hedge planting could be provided in existing gaps (for example the north-west boundary / north of the existing gates). The existing hedgerow could also be allowed to grow and be maintained at a slightly higher level - say 3.5metres?

RECOMMENDATION No objection subject a review of the opportunities for additional screening / planting, as noted above. Details could be conditioned using COM9 (parts 1,2,4 and 5).

CONTAMINATED LAND

1 Summary of Comments:

I have reviewed the following report as submitted with the application:

Title: Ground Investigation Report; Ref: GWPR1479/GIR; Version V1.01 Dated: February 2016; Prepared by: Ground and Water Ltd.

Details within the report include an updated conceptual site model and risk assessment which indicate that, in terms of land affected by contamination, chemical analyses of soil samples sampled during the site investigation did not identify any significant contamination over a majority of the land at the site and therefore it is concluded that the existing playing area of the site will be suitable for continued use with the proposed replacement pitch.

However, in terms of the land at the proposed location of a new temporary gym building, an elevated concentration of carbon dioxide was recorded in a single borehole/gas monitoring well which was drilled in proximity to the southern corner of the proposed structure (see observations section below).

Therefore, I recommend the following conditions be imposed if planning permission is awarded:

Gas Condition

Ground Gas Survey

Before any part of the development is commenced, the applicant shall carry out and submit details of an updated ground gas survey to be conducted below the footprint of the proposed new temporary building. If unacceptable concentration/s and flow of ground gas are detected, the applicant shall install gas protection measures to prevent gas ingress to the proposed building. This condition will not be discharged until works have been completed and appropriate validation and verification information has been submitted to and approved by the Local Planning Authority.

REASON: The Council's records show that the development site has ground conditions which

suggest possible ground gas risks may be present. A gas survey is required to clarify that there is no significant gas issues at the location of the proposed structure; all in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

Soil Condition

Imported Materials Condition

No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and or engineering purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted to the Local Planning Authority for approval.

REASON: To ensure that the occupants of the development are not subject to any risks from soil contamination in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

2 Reason for Refusal (if objecting):

Not applicable (subject to the above conditions)

3 Observations:

- The report indicates that scheduled monitoring of soil gases detected an elevated concentration of carbon dioxide (CO₂) which was recorded on one of two monitoring visits undertaken over a two-week period.
- The CO₂ exceedance was identified in window sampling borehole WS1 which penetrated materials of the Boyne Hill Gravel strata to a depth of 3.45mbgl.
- No made ground materials were recorded in the borehole log for WS1
- Borehole Log from BH1 (de-commissioned following drilling) indicate made ground is present in the location of the proposed new temporary gym building.

ACCESS

This proposal is underpinned by an intention to provide a sports facility for the local community and for sports organisations to participate in physical activities for health improvement and development particularly amongst low participant groups of people. Of note is an intention to encourage and increase the number of people, including disabled people to take up sport. In framing the following comments, reference is made to policy 3.1 and 7.2 of the 2016 London Plan, and the Council's Accessible Hillingdon Supplementary Planning Document (adopted September 2017): 1. One accessible parking bay is noted at the top of the 1:20 vehicle slope. From the accessible parking bay level access is shown on plan 8164.03.01. 2. No comments on the AGP however the temporary gym facility should be fully accessible to include a range of equipment accessible to disabled people. 3. The Design and Access Statement refers to Sports England's Technical Design Guidance Note, 'Accessible Sports Facility 2010', but does not explain how the guidance has been applied to the proposed development. 4. Access to the pitch should be possible via a continuous pathway and any spectator areas and seating should be accessible to wheelchair users with good sightlines to the pitch. Further details are required in this regard. 5. The plan for the intended gym building lacks the necessary detail for an accessibility assessment of merit to be carried out. Details should include: a.

Accessibility to welcome area and any reception desk. b. Toilet facilities accessible to older and disabled people. c. Changing facilities for wheelchair users. d. Accessible showering facilities 6. A 'Changing Places' cubicle measuring 3m x 4m (12m²) should be incorporated into a revised floor plan to be considered as part of the determination of this planning proposal. CONCLUSION: further details in respect of the points raised in numbers 4 to 6 above are requested.

OFFICER COMMENT: Conditions will be imposed to secure 4 and 5 above, however, a changing places facility of the size suggested cannot be facilitated without causing detrimental harm to the Green Belt by virtue of impacting upon the openness of the Green Belt. The University have advised that Changing Places facilities exist on the main campus that could be used where required.

NOISE COMMENTS (SUMMARY ONLY)

Recommendations:

Where time permits, it is our opinion that the report should be updated as follows to help inform the determination of the planning application:

- Fully describe the current and proposed use(s) of the pitch, drawing out what would be different under the proposed use.
- Fully consider the guidance in the NPPF and Sport England DGN and determine a suite of thresholds that can be used to judge the likelihood and degree of adverse effect. This will likely need to address any change in sound levels and/or number of occurrences rather than absolute sound levels. Professional judgement will be required.
- Identify and consider all key noise-sensitive receptors/locations.

Where time does not permit such revisions before a decision needs to be made, and where LBH is mindful to grant permission, then it is considered that the risk is sufficiently low that the additional assessment could be conditioned.

Alternatively, given the generally like-for-like nature of the development, and our anticipated low risk of significant adverse noise effect, it is considered that the Council could take the position that no further noise assessment is required.

OFFICER COMMENT: The above information was submitted and further reviewed with the following summary recommendations:

4 SUBSEQUENT RECOMMENDATIONS

The only real difference between the two version of the NIA report is the inclusion of further details on the existing and proposed uses (as presented above), but where it is questionable if the information is complete or consistent. Essentially, therefore, nothing has changed since the previous review, and all previous comments and recommendations remain valid, in our opinion. However, this includes our conclusion that the risk of significant adverse noise effect is low, and that the Council could take the position that no further noise assessment is required.

OFFICER COMMENT: based on the summary set out above and the low risk of significant adverse noise impacts, no further information was requested, but the implementation of the Noise Management Plan contained within the Noise Assessment will also be conditioned should planning permission be granted.

ECOLOGY

In general, the ecological impacts are negligible (except for badgers). The current amenity grassland would present minimal value for wildlife and therefore its loss to an artificial pitch would be negligible.

With regards to badger sett; it does not appear necessary to close it from a practical construction point of view. The badger report states that 'if there is likely to be a breach, then it should be closed'

but doesn't provide a plan of the proposed development in the context of the badger sett. Furthermore, there is no discussion of the construction impacts or operation of the artificial pitch save for a few minor references. Simply put, the closure of this sett has not been properly justified.

The sett may be an outlier but it is on the edge of a larger area of ideal habitat for badgers and relatively undisturbed. Therefore even if the amenity grassland were to be replaced by the artificial pitch the connectivity from this sett to the wider habitats would remain. Therefore, the preferred approach would be to retain the sett. On receipt of sufficient justification that the sett must be closed then the applicant must present alternative ecological enhancement measures to offset the loss of the outlier sett. It would not be acceptable to simply close the sett without any mitigation or consideration of enhancement opportunities.

The following condition is therefore necessary:

Condition

Prior to commencement of laying the artificial pitch, a scheme for the protection of the outlier badger sett identified within the badger survey shall be submitted to and approved in writing by the Local Planning Authority. Should the applicant be unable to provide sufficient protection for the sett to allow it to remain in situ then suitable written justification must be provided as to why it cannot be retained along with method statements regarding its closure; this written justification and method statement along with a detailed plan for the mitigation of the loss of sett shall be submitted to and approved in writing by the Local Planning Authority. The development must proceed in accordance with agreed written approach of the Local Planning Authority.

Reason

To ensure the development contributes to the protection of valuable species in accordance with EM7 of the Local Plan Part 1.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The application site accommodates an established outdoor grass sports pitch used for Rugby. The entire campus, including the rugby pitch falls within the Green Belt as designated in the Hillingdon Local Plan. Accordingly, the key issues pertaining to the principle of development relate to the impact of the development on the openness of the Green Belt.

ENHANCEMENT TO EDUCATIONAL FACILITIES AND SPORTS PROVISION

Paragraphs 91- 93 of the NPPF (2019) state planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, enable/support healthy lifestyles and provide social and recreational facilities to meet local community needs - including the provision of sports facilities. Paragraphs 96 - 101 of the NPPF (2019) state that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to health and the well-being of communities. The document is clear that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless the loss can be replaced by equivalent or better provision, or the development is for alternative sports and recreation.

At a regional level, London Plan Policy 3.19 (Sports Recreation 2016) indicates development proposals that increase or enhance the provision of sports and recreation facilities will be supported. Policy S1 (intended to publish version 2019) states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be

supported.

The London Plan (adopted and Draft) also provides in principle support for proposals which support London's world class higher education institutes. Policy 3.18 of the London Plan (2016) states that the Mayor will "support provision of higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice", requiring Local Plans to assess the need for higher education development and secure sites for provision.

Part B of Policy S5 ((Sports and Recreation Facilities) of the Intend to Publish Version of the London Plan (2019) states that Development proposals for sports and recreation facilities should: increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling; maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities.

Part C of Policy S5 also states that existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

The application proposes the replacement of the existing grass surface rugby pitch with an rugby league standard artificial grass pitch (AGP). The application also proposes a temporary gym facility which will be accessed by the participants of the rugby programme only. As demonstrated above and through the comments from both the GLA and Policy Officer, the proposed gym building is generally supported by virtue of Very Special Circumstances.

GREEN BELT

London Plan (2016) policy 7.16 and the NPPF (2019) confirm that the strongest protection should be given to the green belt and that inappropriate development should be refused, except in very special circumstances.

Policy EM2 of the Local Plan: Part 1 (2012) confirms that any proposals for development within the Green Belt will be assessed against national and London Plan polices, including the very special circumstances test.

Policy OL1 of the Local Plan: Part 2, and Policy DMEI 4 of the Hillingdon Local Plan : Part 2 - Development Management Policies (March 2020) confirms that only predominantly open land uses will be considered acceptable within the Green Belt and that planning permission for other uses will not be granted.

Policy DMEI 4 of the Hillingdon Plan : Part 2 - Development Management Policies (2020) states:

- A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.
- B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness

of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;
 - ii) the proportion of the site that is already developed;
 - iii) the footprint, distribution and character of the existing buildings on the site;
 - iv) the relationship of the proposal with any development on the site that is to be retained;
- and

The NPPF (2019) sets out the national planning policy approach to development in the Green Belt. It states that planning authorities should continue to consider the construction of new buildings in the green belt as "inappropriate". However the NPPF notes that certain forms of development can be considered as being 'not inappropriate' provided they preserve its openness and do not conflict with the purposes of including land within it.

Paragraph 145 lists these exceptions. Of relevance to the proposed development, this includes:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Having regard for the above policies, the applicant has submitted a planning statement with evidence which supports why this development should be considered acceptable within its Green Belt location. The documents states "It is not considered therefore that the works to upgrade the pitch, or the provision of a temporary building to house a gym (the use of which will be ancillary to the existing material use of the land) represent inappropriate development ". Furthermore the document refers to the development as complying with both exception b) "provision of outdoor sports facilities", and or g) "limited infilling or the partial or complete redevelopment of previously developed land", as justification for why the development is considered to be appropriate.

Whilst it is clear that the proposal for a replacement of the grass pitch with an AGP would be used for outdoor sports and would therefore meet exception b) of paragraph 145, the harstanding and additional fencing around the perimeter of the pitch would have an additional impact upon the openness of the Green Belt which requires assessment.

Moreover the temporary gym facility would measure approximately 1200 sqm and 6.2 m in height which is a significantly sized building and would not be considered to comply with exception g). Furthermore whilst the building would be associated to the AGP by way of its use by those who participate in the rugby programme, the fact it is an indoor gym facility means it cannot be considered as an extension to the outdoor sports facility. Whilst the applicant has stated that both the AGP and gym accord with parts b) and or g) of paragraph 145 of the NPPF given the lack of evidence with the submission to support this, the temporary gym would be considered inappropriate development and therefore very special circumstances need to be demonstrated to justify the need for the gym in this location. This justification must outweigh the potential harm for the development to be considered acceptable.

The Planning Statement preempts that the Council would take this view which is supported by the GLA in their comments and provides a list of very special circumstances and evidence to justify each point. These are as follows:

- (1) There is an economic and social need for the development;
- (2) There is no reasonable alternative means of meeting this need;
- (3) The proposed development is deliverable and will realise significant public benefits; and
- (4) The scale and severity of harm to the Green Belt will be limited.

1) Economic and Social Need and Urgent Requirement for Facilities

The planning statement emphasises the role which the higher education sector has to play in delivering social and economic policy objectives at local and national level. Furthermore the applicant states that Brunel University is considered a successful higher education and economic asset and is well placed to deliver improvement and growth necessary to satisfy economic and social needs. The applicant highlights research which indicates that engagement in sports at university leads to improved graduate employability and that there is a direct link between sports facility provision and the future economic performance of graduates.

The document goes on to state that given student numbers are rising, sports participation is also growing and the success of the rugby partnership programme with Ealing Trailfinders there is a need to increase the sports facilities on site to meet this demand. The submission provides some evidence towards this by stating that over 4,000 students participate in some form of sport or physical activity each week either as part of an existing sports club or through the use of an on campus gym. Moreover the document includes the results of a survey undertaken by the applicant, of the existing gym facilities which demonstrated significant capacity issues. Specific issues were identified relating to the quantity and access to the types of strength and conditioning equipment required by the rugby programme.

The applicant states there is a forecasted increase in the growth of the rugby programme and that it will deliver a 10% increase in the number of students who access the sports provision within the university campus. The submission demonstrates that the university is unable to absorb this increase within its existing sports infrastructure and the playing demands of the current grass pitches.

The statement provides policy references such as paragraphs 91, 92 and 96 of the NPPF which require planning decisions to enable and support healthy lifestyles, especially where

this would address identified local health and well-being needs (for example through the provision of sports facilities) and that that access to opportunities for sport is important for the health and wellbeing of communities. Further references include London Plan which sets out support for increasing accessibility to, and participation in sport and recreation.

(2) There is no reasonable alternative means of meeting this need

The proposal seeks permission for a temporary gym facility for up to 5 years, which will allow time for the university to prepare and submit a new masterplan. The masterplan will detail how the university plans to deal with its forecasted growth over an extended period (e.g 10 years) to ensure that all educational need requirements can be planned for. As such the applicant is seeking a short-term solution in order to meet the demand for sports provision within the university.

Given that the entire campus is located within the Green Belt it is clear that locating the new gym floorspace anywhere else within the campus would create a similar scenario. As stated above the applicant has demonstrated the growth of the sports provision demand and in particular gym space floor space has risen to a point where it can no longer be accommodated within its existing facilities. As such locating a temporary building next to the pitch which would improve the functionality of the programme and free up gym space within the campus for wider use, is viewed as logical.

The applicant raises additional points to support the gyms proposed location by stating that other locations considered were also inappropriate due to reasons of noise, proximity to existing buildings, locations within areas of flood risk and the size of the proposed development.

Additional benefits such as the accessibility of the site by way of public transport and walking are also listed which are accepted and these would assist with reducing the potential for significant vehicle trip generation.

(3) The proposed development is deliverable and will realise significant public benefits;

The applicant has stated that the temporary gym facility will be available to students of the university only. This decision is understandable given the shortfall in gym space across the campus as described within the planning statement. However the AGP will be made available for wider public use in a similar way to the other sports facilities within the university ownership such as the AGP football / hockey pitches, athletics track and gyms within the main campus. The submission states that the existing sports facilities can be booked via a mobile or other device application and the university monitor the use of the facilities by students and the wider public in order to ensure adequate availability is provided for both. Furthermore it is clear that the university is able to use sports facilities as a tool for revenue therefore it there should be little concern relating to the university restricting public use to an unacceptable level.

Moreover the applicant has stated that the university will be supporting access to rugby within the university by working with clubs/organisations outside of the university. This will be provided through the following ways:

- An apprenticeship programme to provide a non-academic pathway combining rugby and

personal development towards employment. Training and matches would take place at the university;

- Allowing participation of the Brunel Trailfinders Rugby Club in the Rugby Football Union (RFU) which will provide match activity to players on the apprenticeship programme alongside other Brunel students;

- Working with the Middlesex County Constituent Body RFU to support and deliver rugby for under 18 and under 20 programmes, many of the events for which will be delivered at the proposed facility;

- Through an Inner City Educational Support Programme which is being created to provides routes towards higher education for talented young athletes. Financial bursaries will support students to study at Brunel and other select colleges;

- Through links with schools throughout London and the South East of England, the Trailfinders Academy will support the use of the proposed facilities for training and matches for these schools throughout the year.

(4) The scale and severity of harm to the Green Belt will be limited (Visual Impact)

In terms of visual impact, the site currently comprises of an existing turf rugby pitch with associated rugby goal posts, flood lighting and a pitch boundary which segregates the spectators from the playing surface. The existing pitch sits within a perimeter bund which differs in height due to the land level change which slopes down as you approach the front of site from Kingston Lane. The site benefits from dense foilage along the northern, southern and western boundaries which significant screen views of the pitch from outside of the site. However given the height of both the rugby posts and the floodlights these can be viewed from significant distances outside of the site.

The applicant has stated there is an underlying shortfall in gym space which is failing to meet the current demand for sports provision and in particular the type of gym equipment which is required to meet the needs of the athletes within the rugby programme. It is therefore acknowledged that the university would need to increase gym floor space within the boundary of its ownership and whilst the temporary building is not considered to be an extension to the outdoor sports facility it is recognised that this is a practical location in terms of how it will improve the functionality of the programme as participants can move between the gym and the pitch with ease. The built form is not the only element for which harm can be attributed. Whilst the pitch itself is not considered to present additional impacts to the openness of the Green Belt, the additional hardstanding and perimeter fencing are considered to have moderate adverse impacts.

The proposed new Gym building is approx 60x20m with a 3m eaves height and a low pitched roof. The building is single storey, and is approx 1m above the footway level on Kingston Lane and the overall ridge height of the pitched roof is 6.18 m. The requirement to allow a flexible layout to the space to accommodate various gym equipment sets the eaves height at 3.0m combined with a low pitched roof setting the ridge height. The proposed building is industrial in appearance with insulated profiled sheeting for the walls and gable ends and an air filled white PVC coated fabric roof covering. The building is a low linear form, in 5m bays -the entrance area is articulated with entrance doors and windows, the pitch side elevations provide windows and access doors towards the new AGP. The elevation to Kingston Lane is plain, being set close to the existing retained hedgerow.

The site is bounded to the west and the north by the Hillingdon Moutary and Hillingdon

Cemetery. To the east is the universities athletics track and football/hockey pitches and to the south lies the academic campus which comprises of a high number of buildings varying in scale and design. The site itself benefits from dense foliage which creates a green screen around the boundary which exceeds 2 m in height particularly at the front of the site along Kingston Lane. With this in mind it is clear that the sense of openness is restricted when viewed from Kingston Lane and from within the site itself when looking south towards the wider university campus. Notwithstanding the above there are number of open areas created through the gaps within the foliage along the boundary shared with the cemetery, partially when travelling north along Kingston Lane, through the gaps in the hedge row where the path leads into up to the entrance to the athletics track and from within the athletics track itself. The applicant has submitted a views assessment which demonstrates that there will be some level of impact from each of these view points.

Whilst it is clear that the proposed temporary gym would be of a considerable scale and would result in an impact to the openness of the Green Belt, the applicants Design and Access Statement demonstrates that the applicant has reduced the scale of the development in order to ensure that the impact to the openness is minimised as much as possible during the lifespan of the temporary building. Given the temporary nature of the gym building, it is not considered that it has any significant adverse impact on the long-term openness of the Green Belt or the visual amenities of the surrounding area. Furthermore the applicant notes that the temporary nature of the facility means that it's impacts are reversible. The applicant has agreed that after five years the land will be returned to its original or equivalent or improved states of openness and that they are agreeable for this to be secured by planning condition.

Taking these points into account it is considered that the potential harm to the openness of the Green Belt would be outweighed by the benefits of the scheme and the proposals therefore comply with national, regional and local planning policies.

IMPACT ON THE PLAYING FIELDS AND PROVISION OF ENHANCED SPORTS FACILITIES AND COMMUNITY BENEFITS

The proposed development would result in alterations to the layout of the site, which would affect playing field provision. Paragraph 74 of the NPPF (2019) states that:

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss."

Policy 3.19 of the London Plan (2016) expects development proposals to increase or enhance the provision of sports and recreation facilities. Proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted.

Policy S5 of the draft London Plan (2019) seeks to retain existing playing fields unless (among other criteria) the loss resulting from the proposed development would be replaced by equivalent or other better provision in terms of quantity and quality in a suitable location

or the development is for an alternative sports and recreational provision and the benefits of which clearly outweigh the loss of current and former use.

Policy DMCI 1A of the Local Plan: Part Two (2020) requires new schools to consider their impact on green open space, games pitches, outdoor play and amenity space, taking account of the character of the area, whether the site is within an area of open space deficiency and whether the school has sufficient outdoor space for play and games.

Further to the above, the 'Playing Fields Policy' states that 'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of all or any part of a playing field, or land which has been used as a playing field and remains undeveloped, or land allocated for use as a playing field, unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

The five specific exceptions are identified as follows:

1. 'A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.'
2. 'The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.'
3. 'The proposed development affects only land incapable of forming part of a playing pitch and does not:
 - reduce the size of any playing pitch;
 - result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
 - reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
 - result in the loss of other sporting provision or ancillary facilities on the site; or
 - prejudice the use of any part of a playing field and any of its playing pitches.'
4. 'The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:
 - of equivalent or better quality, and
 - of equivalent or greater quantity, and
 - in a suitable location, and
 - subject to equivalent or better accessibility and management arrangements.'
5. 'The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.'

The proposed development would present a loss of a proportion of the playing field and the replacement of a turf pitch with an artificial grass pitch therefore Sport England are required to be consulted. The London Borough of Hillingdon does not have a Playing Pitch Strategy which would be referred to in order to determine whether there is a surplus in the availability of turf pitches within the borough which could be used. Furthermore there is no specific data which would allow officers to assess the usability of the turf pitches across each year over specific period which would be useful in determine whether there is a need for artificial grass pitches to increase the level of all year round outdoor sports provision. Sport England recognise that the absence of such information place the emphasis on the

applicant to provide a robust argument for both the replacement of the turf pitch and the partial loss of the playing field.

In commenting on the proposal Sport England refer to the submitted documentation which indicates that the development would provide facilities for both the University and Ealing Trailfinders and consequently it could be suggested that there is some demand for the proposed development. In addition to this it should be noted that Ealing Trailfinders have taken up residency at the Brunel Rugby pitch and participate in home fixtures here twice per week as well as training. Sport England have stated that no agronomy report has been submitted to support the need to replace the turf pitch with an artificial surface however it is clear from the submission that the quality of the surface is not being used as a reason for replacing it with an AGP, but instead it is the ability to extend its use if it were to be replaced. In essence the AGP can be used at all times of the year whereas it is inevitable that a turf pitch will be unplayable due to weather conditions more often. This is recognised by Sport England and the Council agree with this point.

It is common for Sport England to object to the partial loss of a playing field, however as stated above in visual impact section, the use of the existing playing field is relatively constrained to the existing rugby pitch due to the location of the sports lighting and size of the site. Therefore the impact of the proposed AGP preventing other sports on the site now or in the future is limited.

It is recognised that the location of the gym is acceptable given the improvements this would make to the functionality of the programme and the wider benefits it will bring to the campus and general public. It is noted that SE do not raise an objection to the potential loss of part of the playing field to facilitate the construction of the temporary gym as the area is unlikely to have been used for formal sport and any informal use (training, warm up etc) could be relocated to the playing pitch as there will be much less concern with the potential wear and tear of the surface. In addition, since this element of the proposal is temporary then this area of playing field would come back into use once the building is removed.

Overall, Sport England states it is willing to take a "pragmatic" approach to the partial loss of the playing field to facilitate the temporary gym and the replacement of the turf pitch with an AGP providing a community use agreement is submitted and approved by the local planning authority which secures the level of public availability of the pitches. In addition a reinstatement condition has been requested to ensure that the land utilised for the temporary gym is reinstated to a playing field once the 5 year expiration of the temporary consent has passed.

With regards to the request for an agreement. At the moment, the grass pitch only has student use for training and matches so the introduction of the artificial pitch will only help to increase community usage of Brunel's sports facilities as there will not be the need to protect the playing surface in the same way.

The university has a process in place for existing sports facilities where by students, members and the wider public can book a time to use the facilities via a mobile app. Whilst it is understandable that a community use agreement be sought by Sport England to ensure that the local community benefit from the proposed development, an agreement would normally include a framework built around providing specific time slots that the facility would be available to the applicant or student population and a separate set of times for the wider community. The concern here would be that a rigid agreement could

result in an underutilised facility, possible loss of revenue to the university and restricted community benefit. The applicant was asked to provide evidence relating to the split between member/student bookings and those by the wider community. The evidence demonstrated that almost two thirds of the bookings for the 3g pitch adjacent to the south of the athletics track were made by the wider community (external hire) across 12 months. As such the existing method of booking the facilities are considered adequate.

Notwithstanding this point an agreement could be submitted containing the details of how the existing booking system works and how successful it is in ensuring adequate provision is provided to the wider community in order to justify the harm caused by the loss of the turf pitch and the partial loss of the playing field

7.02 Density of the proposed development

Not applicable to this application

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

Policy DMHB 9: states memorials and their wider settings will be protected, and there is a general presumption in favour of their retention in situ. They should be well maintained and their alteration, removal or sensitive relocation will only be considered when fully justified within a Heritage Statement.

There are no Conservation Areas, Listed Buildings or Areas of Special Local Character within the vicinity. Notwithstanding this point the Council is aware the the adjacent cemetery accommodates a number of commonwealth war graves for which the setting should be preserved. A site visit was undertaken by the Case Officer and none were found along the boundary shared with the application site or any of the view points from within the cemetery. As such the development would not result in an adverse impact to the setting on the heritage assets.

Although the application site does not fall within a designated Archaeological Priority Area, there is a requirement to consult Historic England's Greater London Archaeological Advisory Service (GLAAS) due to the size of the site. No objection has been raised and there is no further requirement for conditions.

7.04 Airport safeguarding

The proposed height of the development raises no airport safeguarding issues.

7.05 Impact on the green belt

This issue has been partly addressed in part 7.01 of the report.

The Design and Access Statement states that the Site makes a limited contribution to the Green Belt and would not be likely to have an adverse impact on the functionality of the remainder of the Green Belt as a whole. Notwithstanding this point the development, and in particular the gym structure, would impact the openness of the Green Belt thus each view should be assessed accordingly.

The application site comprises of the an existing turf rugby pitch. The site is bound to the west and the north by the Hillingdon Moutary and Hillingdon Cemetery. To the east is the universities athletics track and football/hockey pitches and to the south lies the academic campus which comprises of a high number of buildings varying in scale and design. The site itself benefits from dense foliage which creates a green screen around the boundary which exceeds 3 m in height particularly at the front of the site along Kingston Lane.

Accordingly the views of the site would be obscured by the dense foliage. the presence of perimeter bunds or in the context of the taller buildings located within the academic

campus.

In terms of visual impact, the existing site results in very little impact to the openness of the Green Belt given that it is only the floodlighting which can be viewed for any reasonable distance and partial views of the perimeter fencing which bounds the pitches from the cemetery and the adjacent athletics track. The application proposes the replacement of the existing turf pitch with a rugby league standard AGP which is not considered to have any additional impacts upon the visual openness of the Green Belt. However the associated hardstanding and perimeter ball stop fencing is as well as the proposed gym which would measure 1200 sqm in floor space and 6.2 m in height which is a significant sized structure and would present a greater impact to the visual openness to the Green Belt. Notwithstanding this point the applicant is seeking a temporary permission for up to 5 years for the gym structure the impact is reversible.

The applicant's Planning and Design and Access Statements demonstrate that the scale of the gym building, which is considered to pose the greatest harm to the openness, has been reduced in order to minimise the harm but remain functional. It is acknowledged that there would be little value in reducing the scale of gym building by a greater volume as this would then result in an over-spill of programme athletes using the gym floorspace elsewhere within the campus which this application is proposing to reduce. With regards to the impact of the perimeter fencing this would be 1.25 m in height and therefore views from outside of the pitch would be minimal. It is recognised that the additional hardstanding to provide parking would also present an impact to the openness of the development and views of this would not immediately be screened due to gaps in the hedgerow required to provide vehicular access into the site.

It is clear that the proposed gym building would be visible from Kingston Lane when travelling both directions. The most prominent view of the building would be from Kingston Lane looking east where the pitched roof would sit above the 3 m hedgerow and from Kingston Lane looking south east where there is a gap in the hedgerow to facilitate the existing vehicular access into the playing field. The views assessment does not provide an in depth assessment of the impact of each view however the planning statement does make reference to some of views within the views document. With regards to views 1.1, 1.2 and 1.3 the statement says, "As shown in the accompanying Local Views Assessment, existing vegetation will screen views of the temporary building in long views north/south along Kingston Lane, with views largely restricted to the immediate western boundary". It is noted that the vegetation would screen approximately to 3-4 m of the height of the gym building and the majority of it's width, the height would extend above the hedgerow by 2-3 metres. Notwithstanding this point the gym structure would benefit from a pitched roof measuring approximately 6 metres but only 3 metres to the eaves which means that the bulk of the height of the roof would sit further away from the boundary thus reducing the overall impact to the openness.

A further assessment was requested from within the cemetery as upon visiting the site to ascertain the location of the commonwealth war memorials the boundary treatment was observed and gaps within the vegetation along the boundary were identified. A views plan was submitted and demonstrates that the gym building would be the only additional structure which would be viewed from within the cemetery and the bulk of the structure would be obscured by vegetation. Furthermore the building would be sited 28 m from the boundary which would also reduce the impact from this location.

Conclusion

Taking all of the views into consideration it is clear that the development would present some harm to the openness of the Green Belt due to the significant size of the gym building. However the most prominent views from outside of the development would be offered from Kingston Lane when travelling in both directions and a large proportion of these views would be obscured by the dense 3 m high hedgerow which tunnels along the boundary of the highway. With regards to the views offered from inside of the development these would be viewed against a backdrop of either the adjacent track or the taller university buildings within the main academic campus. Furthermore the applicant is seeking temporary permission for up to 5 years for the gym building which presents the greatest impact and therefore any potential harm would be reversible.

Taking these points into consideration the proposed development is not considered to give rise to a significant impact upon the openness of the Green Belt and the temporary nature of the development is considered to be acceptable.

7.07 Impact on the character & appearance of the area

Paragraph 131 of the NPPF (2019) requires that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policy 7.6 of the London Plan (2016) requires new developments to make be of the highest architectural quality and be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.

Policy D1 of the London Plan (2019) requires all development to make the best use of land by following a design led approach that optimises the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) re-emphasises the importance of good design in new development by;

- A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and providing landscaping that enhances amenity, biodiversity and green infrastructure;
- B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space;
- C) safeguarding the development potential of adjoining sites and
- D) making adequate provision for refuse and recycling storage.

Policy DMHB 12 of the Local Plan: Part Two (2020) re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The application site comprises of the an existing turf rugby pitch. The site is bounded to the west and the north by the Hillingdon Moutary and Hillingdon Cemetery. To the east is the universities athletics track and football/hockey pitches and to the south lies the academic campus which comprises of a high number of buildings varying in scale and design. The

site itself benefits from dense foliage which creates a green screen around the boundary which exceeds 3 m in height particularly at the front of the site along Kingston Lane. The proposed replacement of the turf pitch with an AGP and the associated ball stop fencing is not considered to have a negative impact upon the character and appearance of the area. The gym building would comprise of 1200 sqm thermolite paneled structure with a pitched roof measuring 6.2 m and which is not considered to be in keeping with the character and appearance of the street scene. However the 3 m dense hedgerow along the front of Kingston Lane would obscure views of the vast majority of the structure as the the eaves are approximately 3 m and the pitched roof reduces the views of the structure further from the road. Similar to the assessment of harm to the openness of the Green Belt the structure would benefit from a temporary permission for up to 5 years meaning any harm would be reversible. As such the proposed development is not considered to have a significant impact upon the character and appearance of the area.

7.08 Impact on neighbours

Policy DMHB 11 (2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

There are no residential properties within the immediate vicinity of the proposed development. It is therefore not considered that the proposal would result in an over dominant form of development, or that there would be a material loss of privacy, daylight or sunlight to surrounding properties which would detract from the amenities of neighbouring occupiers, in compliance with the above mentioned policies and relevant design guidance.

With regards to the illumination of the pitch, as discussed in previous sections the layout and size of the pitch has been dictated by the need to retain the existing floodlighting. No additional floodlight is proposed thus there would be no additional impacts with regards to lighting over spill into neighbouring properties or adverse impacts upon wildlife habitat.

7.09 Living conditions for future occupiers

This consideration relates to the quality of residential accommodation and is not applicable to this type of development.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

Policy DMT 6 of the Local Plan: Part Two (2020) sets maximum car parking standards. For a development of this type it is required that the quantum of car parking provided is determined 'on an individual basis using a transport assessment and a travel plan, and in addition provision for taxi and bus/coach access and parking'.

The Healthy Streets approach forms the core theme of the Intend to Publish London Plan and Mayor Transport Strategy (2018). Healthy Streets for London (2018) demonstrates the health benefits of more inclusive and healthier street environments which are aimed to encourage active lifestyle.

Policy T2 Healthy Streets' (intended to publish version, 2019) outlines that development proposals should:

- Demonstrate how they will deliver improvements that support the ten Healthy Streets indicators in line with TfL guidance;
- Reduce the dominance of vehicles on London's streets whether stationary or moving; and
- Be permeable by foot and cycle and connect to local walking and cycling networks as well

as public transport.

The application proposes to replace the existing turf pitch with a AGP accompanied with associated fencing and a new temporary gym structure. The site is located along Kingston Road which has double yellow line restrictions along its entire length which limits the risk of parking over spill onto adjacent roads. Based on TfL's web-based WebCAT a PTAL of 3 has been calculated for a central point of origin within the Proposed Development. The Proposed Development benefits from a wide range of high frequency public transport services. The existing and Proposed Development is immediately served by four bus routes which are accessible within 640m of the Proposed Development. These stops are served by a total of 36 and 37 services during the AM and PM peak hours, respectively.

The Proposed Development is likely to generate approximately 150 two-way trips (gym staff, coaching staff, medical, admin personnel and the players themselves) each time there is a training session on the pitch, and 200-300 two-way trips each time a rugby match is undertaken, during the day, afternoons/ evenings and at weekends via pre-arranged and structured community access. When matches are undertaken, opposing players are likely to arrive in mini buses, rather than separate vehicles

The site will only offer 1 x disabled parking bay with off-site car parking provided at Brunel University opposite only. This arrangement is considered to be acceptable given that the proposal seeks to increase the availability of sports facilities to serve the existing student capacity where there is an identified need as evidenced elsewhere within this report.

From a student use perspective, the new artificial pitch will mainly be used by the Rugby Performance Programme however other student clubs will also have access and these students will predominantly arrive on foot by walking across from the main campus. Ealing Trailfinders have sent through the following analysis which shows the low car use for the programme

150 (Staff and players)

(i) 131 Players

-Players live on campus and walk to all training (62%)

-14 Live off campus in Uxbridge but walk to all training (9%)

-3 Players live off campus and commute via public transport (2%)

-19 players live off campus and commute via car to campus/training (12%)

(ii) 19 Staff

-17 members of staff live off campus and commute via personal car (11.3%)

-1 member of staff lives off campus and commutes via bicycle (0.6%)

-1 member of staff lives off campus and commutes via public transport (0.6%)

Based on the data collected, rather than a suggestion of 150 two-way individual trips, the figure could be closer to 25, of which 7-10 would already occur due to students attending academic facilities on campus.

When matches are undertaken, opposing players are likely to arrive in mini buses, rather than separate vehicles. It is noted that TFL have requested additional details on the trip generation and that the mode share should reflect the main campus mode share. However it should also be noted that the rugby partnership with Ealing Trailfinders has been operational for more than 12 months with matches taking place on one day per week and

also on a Saturday with spectator parking being provided within the campus without any concerns. This application is for the replacement of the pitch rather than an increase in the number of pitches which means that there would be no additional impacts upon the highway network on matchdays. Similar to the other sports and leisure facilities on site the development would only require a small amount of staff who will have access to parking within the academic campus if required. The University has a permit policy for the allocation of spaces for both students and staff which is controlled by the university.

With regards to vehicle access the existing arrangement is considered to be acceptable by the Councils Highways Officer and this involves vehicular access via double gates with dropped kerbs on Kingston Lane and an ambulance and fire tender will be able to access the site via the existing vehicular access in emergencies. In the infrequent event that a maintenance vehicle is required on site this will be undertaken via the vehicular access point by a small van. TFL have raised concerns with left turning vehicles into the site having to cross the lane of oncoming traffic however given the infrequent use the development would not give rise to significant highway safety concerns.

Pedestrian connectivity to and from the main campus and the proposed development will be via the existing foot paths. The footpaths along Kingston Road between the site, main campus and the bus stop are in good condition as is the a signalised crossing between the site and the main campus.

A number of existing cycle paths exist within the university campus and link to the broader network of Local Cycle Network and National Cycle Route. There is also a public pathway along the southern boundary of the site Hillingdon residential area. To the immediate south of the Proposed Development is Celandine Route, which is a designated off-road shared pedestrian / cycle route, which links to Nursery Lane to the west. The Proposed Development is located approximately 1km to the west of National Cycle Network Routes 6 and 61. Furthermore the entire campus benefits from a number of cycle scheme stations where students and visitors can use a bike from one of the cycle stands at a charge and travel between a number of different locations locally.

The proposed plans demonstrate 1 disabled accessible space is to be provide and 12 cycle parking spaces are proposed which is considered to be acceptable. TFL have suggested that monetary bus contributions should be secured, however as stated previously the works do not increase the intensity of use significantly to warrant such mitigation.

With regards to Vision Zero, the Councils Highways Officer has stated that taking into consideration the scale of development and the good condition of the existing cycling and pedestrian routes, no further work is required.

Taking the above into consideration the proposed development is considered to comply with DMT 2 and DMT 6 of the Hillingdon Local Plan : Part 2 - Development Management Policies.

7.11 Urban design, access and security

URBAN DESIGN

Comments relating to Urban Design are covered within sections 7.1 and 7.5 of this report

SECURITY

The planning statement does not provide reference to how the proposed development adheres to the principles of secure by design. As such a suitably worded condition is to be attached to any grant of consent requiring the development to accord with the principles of secure by design.

7.12 Disabled access

Policy 7.2 of the London Plan (March 2016) requires that all new development proposals provide the highest standards of accessible and inclusive design.

Policy DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that:

A) Development should be well integrated with the surrounding area and accessible. It should:

- i) improve legibility and promote routes and wayfinding between the development and local amenities;
- iii) include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space;
- iv) provide safe and direct pedestrian and cycle movement through the space;
- vii) deliver proposals which incorporate the principles of inclusive design.

It is noted that accessible car parking provision is included as part of the proposed plans and would be secured by condition. Furthermore the pedestrian routes throughout the campus and leading to this development are already in use and further accessibility works are not considered to be necessary. Level access will be provided into the entrance of the site and into the temporary gym structure which complies with the relevant access requirements. Comments received have requested a changing places facility of some 12sqm. Having sought to secure as a small a temporary building as possible it is not considered that an increase in the size of the gym would facilitate a changing places facility is appropriate due to the impact to the openness of the Green Belt. As such the proposal would not be considered contrary to Policy DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 7.2 of the London Plan (March 2016).

7.13 Provision of affordable & special needs housing

Not relevant to this application

7.14 Trees, landscaping and Ecology

TREES AND LANDSCAPING

The NPPF states that development proposals should seek to respect and retain, where possible, existing landforms and natural features of development sites, including trees of amenity value, hedges and other landscape features. It states that development should make suitable provision for high quality hard and soft landscape treatments around buildings.

Policy DMHB 14 of the Local Plan:Part Two (2020) notes all developments will be expected to retain or enhance the existing landscape, trees, biodiversity and natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

There are no TPO's or Conservation Area designations affecting the site and there is no vegetation, other than the roadside hedge. As no trees will be affected by the proposal the applicant has not submitted a tree or arboricultural assessment and there is little reference

to landscaping within the planning statement and DAS. Notwithstanding this point the application has been assessed by the Councils Principle Landscapes Architect who has agreed that the main impact to the visual amenity would be floodlighting columns which will remain as existing and the gym building. The Landscapes Officer has identified the need for additional screening along the north-west and south west corners of the site and also some new upright tree between the gym building and the roadside hedge. Further enhancements are suggested to the front boundary itself in relation to filling in the gaps between the existing hedgerow as well as allowing it to grow up to 3.5 m which will provide additional screening. No objection has been raised to the proposal providing a condition pertaining to the above landscaping enhancements is attached to any grant of planning consent.

ECOLOGY

Immediately to the north of the site is a designated Nature Conservation Site of Metropolitan or Borough Grade I Importance. The following planning policies are taken into consideration:

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy 7.19 of the London Plan (March 2016) states that development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Policy EM3 of the Local Plan: Part 1 - Strategic Policies (November 2012) advises that for development adjacent to rivers, the Local Planning Authority will seek to secure and where possible enhance the role of the river and its immediate surroundings as a wildlife corridor.

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the design and layout of new development should retain and enhance any existing features of biodiversity within the site.

The applicant has submitted an ecological survey in support of the application which identifies 3 key areas for consideration which may provide some ecological value. These are the scattered trees within the site boundary, the hedgerows and amenity grassland. The report identifies all three areas would present minimal value for wildlife and therefore its loss to an artificial pitch would be negligible. However a separate report does indicate the possibility of a badger sett being present. The report states that an active "sett" has been found along the southern boundary shared with the athletics track and recommends that the applicant obtain a licence from Natural England to close the sett.

The Councils Ecology Officer has reviewed the document and states that there is a lack of detail in the submission to justify the closing of the sett as well as the possible impacts of the construction of the development. In commenting on the proposal the Ecology Officer has suggested that a condition be attached to any grant of consent pertaining to the submission of further justification for the closing of the sett and the submission of an ecological enhancement plan in order to offset the loss of the outlier sett.

7.15 Sustainable waste management

Policy 5.17 of the London Plan (2016) sets out the Mayor's Spatial Policy for Waste

Management including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling. The applicant has demonstrated the proposal would include a secure waste storage area within the proposed plan.

Given the use of the site there are unlikely to be many delivery and servicing movements associated with the AGP or the temporary gym facility. Any servicing and refuse movements will be infrequent and managed during off peak hours. Vehicles will use the existing vehicular access point.

Brunel Sport Department would manage waste at the artificial pitch and gym in line with waste collection at our other outdoor sport facilities. A combination of Brunel Sport and Grounds staff collect the waste daily from the bins at the existing facilities and move it to the allocated waste collection point next to the Sports Pavilion. An appointed University contracted waste management company collect all of the waste from our outdoor sports facilities from outside the Sports Pavilion using the existing access road via the car park at the Hillingdon Hospital end of Kingston Lane

7.16 Renewable energy / Sustainability

Policy 5.2 of the London Plan (2016) requires developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

Be lean: use less energy
Be clean: supply energy efficiently
Be green: use renewable energy

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This includes the reduction of carbon emissions through low carbon strategies and encouraging the installation of renewable energy to meet the targets set by the London Plan (2016).

Policy DME1 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

Whilst this is a major scale application the replacement of the pitch would not require additional lighting as it will use the existing floodlighting.

The applicant has confirmed that the energy demand for the temporary gym would be low. In terms of the electrical installation this comprises: -

1. 33 no. 100w LED high bay lights; 1 no. distribution board; 2 no double sockets; switches and cabling; 1 no. internal and 1 no. external emergency light per door
2. Fire alarm system
3. Security and access control systems

There is no heating or water supply. As such it is not considered that an Energy Statement

is required, or that on site renewable energy generation would be required. Whilst renewable energy sources could be considered as beneficial they could present additional impacts upon the views of the Green Belt and present a cost to the applicant which could be greater than the construction of the temporary structure itself. As such the proposed development is considered to be acceptable.

7.17 Flooding or Drainage Issues

Policy 5.13 of the London Plan (2016) states that development proposals should use sustainable urban drainage systems (SuDs) unless there are good reasons for not doing so and that developments should aim to achieve green-field run-off rates. Policy 5.15 goes on to confirm that developments should also minimise the use of mains water by incorporating water saving measures and equipment.

Policy DMEI 10 of the Local Plan: Part Two (2020) applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

The application site is identified as being within Flood Zone 1 as such the development area is at low risk of flooding from surface water, which happens when rainwater does not drain away through the normal drainage systems or soak into the ground, but lies on or flows over the ground instead.

The proposed development will include the creation of an Artificial Grass Pitch (AGP) with new fencing and porous hard standing pathways, as well as the temporary gym facility.

A topographical survey of the area has been completed which shows two plateaus and surrounding land. The South East corner of the site is highest at 50.70 AOD and the north-west corner being the lowest at 43.97 AOD.

The nearest watercourse to the site is the River Pinn which is located approximately 350m west of the site. The river crosses through Brunel University London campus from Harrow Weald and flows into the Frays River.

The proposed development area will occupy land and replace an existing grassed playing field. Surface water from the artificial grass pitch will be drained via the existing piped network and four (4no.) ring soakaways; Adequate attenuation is proposed (water storage) within pitch bases (comprising a permeable granular sub-base) to ensure that excess volumes, which would be experienced during a critical storm event.

Surface water from the temporary gym facility will be disposed of via the Thames Water 225mm sewer before being attenuated within the 36m³ beneath ground attenuation tank with a restricted outfall of 5.0l. This drainage strategy is designed to ensure no above ground flooding occurs up to and including the 1 in 100 year event + 40% allowance for climate change.

No objection has been raised by the Council's Flood Water Management Officer

The surface water drainage from this site, post development, is such that the surface water will be managed and disposed of within the site boundary, thus complying with the Planning Practice Guidance for 'Flood Risk and Climate Change' to the National Planning Policy Framework. Based on the above and providing the above strategies are adopted; the developed site will not contribute further to flood risk thus satisfying the principles of the

National Planning Policy Framework.

7.18 Noise or Air Quality Issues

NOISE

Policy 7.15 of the London Plan (March 2016) states that development proposals should seek to manage noise by:

- a. avoiding significant adverse noise impacts on health and quality of life as a result of new development;
- b. mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;
- c. improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
- d. separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout - in preference to sole reliance on sound insulation;
- e. where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;
- f. having particular regard to the impact of aviation noise on noise sensitive development;
- g. promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that:

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The applicant submitted a noise assessment in support of the application. The proposed hours of use are until 22:00 hours on weekdays and weekends. The nearest existing noise sensitive receivers to the proposed AGP are the residential dwellings approximately 130 metres to the East on The Chantry.

The temporary gym would operate from 07:00 hours to 22:00 hours and will not include any amplified music of gym classes which use music. Given that the activity is inside a building, will no significant sources of noise and is a significant distance from any noise sensitive locations limited impact on residential amenity is expected and is considered acceptable in noise terms.

Notwithstanding this point the applicant presents the inclusion of a noise management plan within the acoustic assessment and this should be secured by way of condition. The noise report should include details for how local residents will be able to report noise to the university and how it will be recorded and dealt with.

The proposal would accord with the requirements of Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy 7.15 of the London Plan (March 2016).

AIR QUALITY

Policy DMEI 1 of the Local Plan: Part Two (2020) requires major development in Air Quality Management Areas to provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

The Local Plan recognises that living walls and roofs allow a number of environmental goals to be achieved in a relatively small space. They also remove particulates that improve local air quality. The Sustainability Officer has requested that a condition is added to the decision notice to ensure the proposal contributes to Air Quality enhancements.

Policy DMEI 14 of the Local Plan: Part Two (2020) requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Developments are expected to be:

- Air quality neutral;
- include mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors; and
- actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

The proposed development (land use class D2) is likely to generate approximately 150 two-way trips (gym staff, coaching staff, medical, admin personnel and the players themselves) each time there is a training session on the pitch, and 200-300 two-way trips each time a rugby match is undertaken, during the day, afternoons/ evenings and at weekends via pre-arranged and structured community access.

The largest number of trips at any one time at the site are likely to be when a rugby game is scheduled. This additional increase in traffic emissions are likely to impact the Uxbridge Focus Area which will add to current exceedances of the nitrogen dioxide annual mean limit value within this sensitive area.

The proposal is air not quality neutral in terms of traffic emissions. As per the London Plan, developments need to be neutral as minimum and contribute actively to reduce pollution in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

The trip generation associated with the operation of the upgraded facilities will generate in average 0.2 tonnes of NO_x and 0.01 tonnes of PM_{2.5} per annum which equates to a damage cost of £76, 801. Assuming the travel plan in place achieves a 10% traffic reduction and that modal shift actions by users achieve a further 15% reduction, the residual damage cost is £57, 601. The applicant has agreed this contribution.

Therefore, a section 106 contribution of £57,601 is required to address the resulting increase in air pollution emissions associated with this additional proposed development.

7.19 Comments on Public Consultations

See external comments section of this report

7.20 Planning obligations

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) relates to securing planning obligations to supplement the provision recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. This policy is supported by more specific supplementary planning guidance.

Should the application be approved, a range of planning obligations would be sought to mitigate the impact of the development, in line with Policy DMCI 7 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

Relevant Officers have reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

1. Air Quality Damage Cost. A contribution sum of £57,601 to address the resulting increase in air pollution emissions associated with this additional proposed development.
2. Travel Plan. The applicant shall amend the universities existing site wide travel plan to incorporate the additional trips associated to the proposed development and it's community use.
3. The applicant shall agree to remove the gym structure within 5 years of the date of planning consent.

Community Infrastructure Levy

The proposal is not liable for the London Borough of Hillingdon CIL and the Mayor of London's CIL, as although the scheme provides more than 100 sq.m of floorspace in accordance with paragraph 52 of the CIL regulations temporary planning permissions are exempt from CIL liability.

7.21 Expediency of enforcement action

Not applicable to this application

7.22 Other Issues

CONTAMINATED LAND

Policy DMEI 12 of the Local Plan: Part Two (2020) requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

The application site is highlighted as being at risk of ground contamination therefore the applicant has submitted a ground water investigation report in support of the proposal. Details within the report include an updated conceptual site model and risk assessment which indicate that, in terms of land affected by contamination, chemical analyses of soil samples sampled during the site investigation did not identify any significant contamination over a majority of the land at the site and therefore it is concluded that the existing playing area of the site will be suitable for continued use with the proposed replacement pitch.

However, in terms of the land at the proposed location of a new temporary gym building, an elevated concentration of carbon dioxide was recorded in a single borehole/gas monitoring well which was drilled in proximity to the southern corner of the proposed structure.

The report indicates that scheduled monitoring of soil gases detected an elevated concentration of carbon dioxide (CO₂) which was recorded on one of two monitoring visits undertaken over a two-week period. As the document states that the testing returned positive traces of the aforementioned gases further survey work is required to be submitted to the local authority and if unacceptable concentration flows of ground gas are detected then a plan detailing appropriate mitigation will be submitted and approved by the LPA.

The councils Contaminated Land Officer has reviewed the proposal and raises no objection subject to the above ground gas survey condition and a further condition pertaining to the use of imported material such as soils.

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 Probity 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

Not applicable

10. CONCLUSION

The application seeks to upgrade the existing sports pitch, with associated perimeter fencing and technical dugout recessed areas, erection of temporary gym facility, and associated works. The works proposed are to enhance the Universities rugby programme which they partner with Ealing Trailfinders who are a professional rugby club.

The entire university campus is located within the Green Belt therefore an assessment of the developments impact to the visual openness has been undertaken. It is acknowledged that replacement of the existing turf pitch with an AGP meets paragraph 145 part b) of the NPPF and is considered appropriate development. The temporary gym building is not considered to meet this exception however very special circumstances which include, economic and social benefits, enhancement to sports provision to meet the identified need and limited impact upon the openness have all been agreed. The application is supported by both the GLA and Sport England who agree that the benefits of the scheme outweigh the potential harm to the Green Belt and temporary loss of the playing field. As such the proposal is considered to meet the necessary Green Belt policies at national, regional and local level.

A head of term has been included to restrict the consent for the temporary gym building for up to 5 years.

Furthermore the proposed development is not considered to give rise to adverse impacts upon the residential amenities of surrounding properties or the visual amenity of the street scene.

Taking the above into consideration the proposed development is recommended for approval subject to conditions and a s106 agreement.

11. Reference Documents

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)

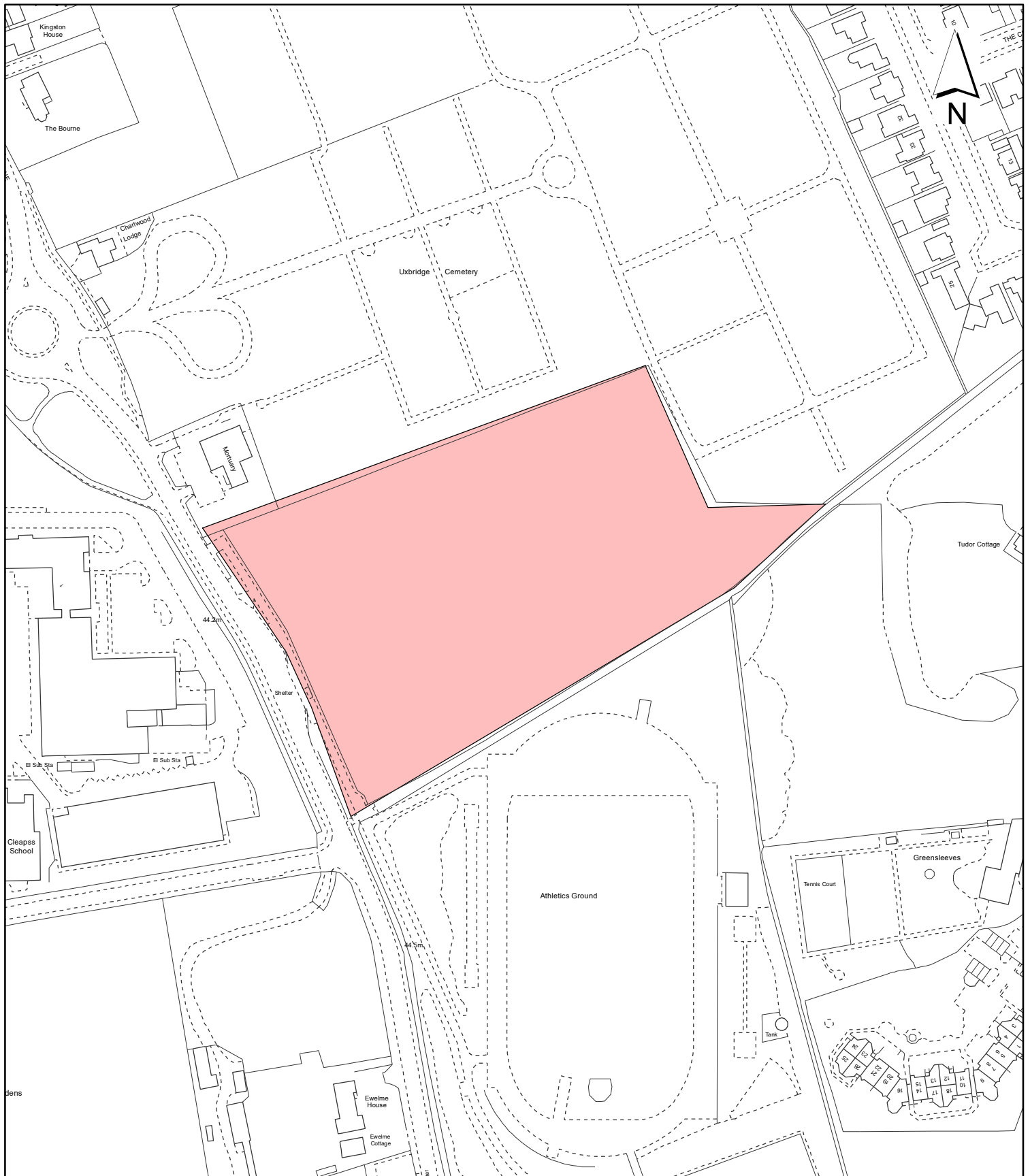
Hillingdon Local Plan: Part 2 Site Allocations and Designations (2020)

Hillingdon Local Plan: Part 2 Development Management Policies (2020)

Hillingdon Local Plan: Policies Map (2020)
London Plan (March 2016)
London Plan (Intend to publish draft) 2019
National Planning Policy Framework (2019)
Policy Statement - Planning for Schools Development (DCLG, 15/08/11)
Council's Supplementary Planning Document - Planning Obligations (2014)

Contact Officer: Christopher Brady

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Notes:

 Site boundary

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Site Address:
**University Playing Fields
 Brunel University
 Kingston Lane**

Planning Application Ref:
532/APP/2020/1978

Planning Committee:
Central & South

Scale:
1:2,000

Date:
December 2020

**LONDON BOROUGH
 OF HILLINGDON
 Residents Services
 Planning Section**

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