

Richard Phillips

From: Daniel Hyde <Daniel.Hyde@freeths.co.uk>
Sent: 23 August 2021 09:47
To: Richard Phillips
Cc: Mark Harris
Subject: RE: Harlington Sports Ground - 2021/1971
Attachments: HARLSPITCH-B.pdf; HLS2191 REV2.pdf

Hi Richard,

I thought it best / easiest to respond to your email here.

In relation to the location of the cricket pitch / wicket, the updated plan attached shows that the cricket pitch has since been moved further north in order to accommodate for the rugby pitch that will be adjacent to the MUGA – the image that you sent was an older aerial view. As such, there will be no conflict here between the MUGA and the cricket pitch, or any other pitch for that matter. The cricket pitch/wicket being moved further north has no conflict with the rugby or football pitches (i.e. with the boundary etc.) as they are played during different seasons.

In terms of the lighting grid concern from Sport England, we did submit the attached plan with the application (ref: HLS2191 REV2) – this includes the lumens / lux levels across the playing surface, this should satisfactorily cover the point they raise around the Principle Playing Area and the Total Playing Area that is lit. In essence, the Principle Playing Area will be fully lit, with a small amount of the surrounding Total Playing Area.

In terms of the community use point, Imperial College do not have the operational capacity at Harlington to be handle ad hoc bookings throughout the day / week. To implement this would cost more and would ultimately make the implementation of the MUGA unviable for them. To reiterate, there will be regular block bookings available for schools / private bookings during these regular slots. In terms of the arrangement with QPR, it is appreciated that the main community times of use would be weekday evenings and weekends, when QPR players and officials are less likely to be on site. Nonetheless, in their capacity as a professional football team, they do not want excessive numbers of members of the public walking around the Site for privacy reasons (i.e. seeing their training, looking around the main building / into windows which could reveal confidential information etc.). Furthermore, QPR are concerned that if there were ad hoc bookings available, this would not stop members of the press / opposition teams, being able to book the MUGA in order to gain access to the Site whilst they are training or to look around the facilities where they are not meant to. As such, the MUGA will be available for the public to book into the regular block booking slots, but there will not be an opportunity for ad hoc bookings due to the concerns QPR have over members of the public, press or opposition teams being able to access the site.

I hope this fully clarifies the position, but please let me know if you have any other comments.

Please could you also confirm, that dependent on Sport England's response to this email, that would we still be able to make the September committee?

Kind regards

Dan

Daniel Hyde
Associate - Planning Associate
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From: Richard Phillips <RPhillips@Hillingdon.Gov.UK>

Sent: 19 August 2021 10:55

To: Daniel Hyde <Daniel.Hyde@freeths.co.uk>

Subject: RE: Harlington Sports Ground - 2021/1971

Dan,

I have now received further comments from Sport England who are still maintaining their objection. There is an aerial photograph missing so I'll ask if Mark can send separately as word document. I also attach the lighting grid. Sports Englands comments as follows:-

Our Ref: PA/21/L/HN/58627

Dear Richard,

Thank you for consulting Sport England on the additional information received.

As previously noted, the proposal prejudices the use of playing field therefore the consultation with Sport England is a statutory requirement. Sport England has considered the amended application in light of the National Planning Policy Framework (particularly Para 99) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document' that can be found at https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Existing and proposed pitch layouts have now been provided although this does not include the 'summer' sports as requested previously by Sport England. It is noted that the accompanying statement/email states that the area where the proposed Multi-Use Games Area (MUGA) would be located has never been used for a football or cricket pitch however aerial photographs suggests that this might not be the case if the submitted drawings accurately show the proposed location of the MUGA. There appears to have been two cricket wicket squares on the site since 1999 (or even before) with one square being close enough to the proposed siting of the MUGA to potentially result in the proposed MUGA encroaching onto the pitch. The clearest aerial photograph that shows the boundary marked is from 2015 which is below:

If using the building as a point of reference, it would appear that the proposed MUGA would essentially continue the western building line that would encroach over the cricket pitch boundary thereby resulting in this cricket square being unable to be used. If, however, this is not the case Sport England would like this demonstrated on a proposed site plan with the pitch dimensions specified.

In relation to design, the LTA have indicated that the proposed sports lighting is unsuitable for tennis. This is due to the proposed MUGA intended to be lit as a single court block therefore each individual court cannot be independently controlled. In addition, the columns proposed behind the baseline of the middle court could result in glare that could make serving difficult. In terms of the lighting levels/performance, the Principle Playing Area (PPA), i.e. the court, and Total Playing Area (TPA), i.e. the court and surrounding area, are not defined and relevant lighting grids have not been used so it is difficult for the LTA to understand the performance of the lights. Attached is a lighting grid that the applicant/agent can use to help clarify/address these elements.

Community use has been explained to some extent but clarity relating to the conflict between QPR and the local community not associated to a club using the facility is required so that Sport England can understand the extent of community use that is proposed. The peak time for community use is weekday evenings and at weekends which is unlikely to completely conflict with QPR usage who appear to be occupying another part of the site.

Overall Sport England still have concerns and are, therefore, unable to conclude that the proposal would meet its Playing Field Policy at this stage so it would have to maintain an objection to the application. Sport England, however, envision that this objection can be overcome once the elements above are addressed (and a Community Use Agreement submitted/condition imposed on any approval). I am happy to discuss with the applicant/agent the elements raised above so that a position can be reached to remove Sport England's objection.

At this stage, please note that should the Local Planning Authority be minded to grant planning permission for the proposal, contrary to Sport England's objection 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.

Kind Regards

Mark Furnish

Planning Manager

T: 020 7273 1631**M:** 07920560435**F:** 020 7273 1981**E:** Mark.Furnish@sportengland.org

From: Daniel Hyde <Daniel.Hyde@freeths.co.uk>**Sent:** 18 August 2021 18:06**To:** Richard Phillips <RPhillips@Hillingdon.Gov.UK>**Subject:** RE: Harlington Sports Ground - 2021/1971

Hi Richard,

Is that 21 days from the date that we sent over the information (27th July) or from the date of their email to you? As there is a week's difference there and clearly any delays at this stage are critical to the client.

Is there a contact at Sport England that we could chase? As I mentioned before, it is highly important that we get the application to the September committee in order to minimise disruption to the use of the Site during upcoming academic year and to minimise costs incurred from contractors – I appreciate you cannot refer an application to committee without all the relevant response required, so if we can do any of the chasing in order to expedite matters that would be great.

Kind regards

Dan

Daniel Hyde

Associate - Planning Associate

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From: Richard Phillips <RPhillips@Hillingdon.Gov.UK>**Sent:** 17 August 2021 18:05

To: Daniel Hyde <Daniel.Hyde@freeths.co.uk>
Subject: RE: Harlington Sports Ground - 2021/1971

Daniel,

I received an email from them on 3/8/21 advising they had received the additional information and would try and respond within 21 days.

In terms of the September committee, the closing date for reports is the middle of next week and managers have already asked me to get 3 reports on the agenda and I doubt if I'll be able to find the time to do all these.

Regards,

Richard

From: Daniel Hyde <Daniel.Hyde@freeths.co.uk>
Sent: 17 August 2021 17:21
To: Richard Phillips <RPhillips@Hillingdon.Gov.UK>
Subject: RE: Harlington Sports Ground - 2021/1971

Good afternoon Richard,

Have you heard back from Sport England and your colleagues with regards to the email I provided below?

It would be good to understand as early as possible where we are heading with this, or if there are any other issues that we need to address prior to the committee. I am sure you can appreciate it is of paramount importance to Imperial College to get the application determined at the September committee.

I look forward to hearing from you.

Kind regards

Dan

Daniel Hyde

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From: Richard Phillips <RPhillips@Hillingdon.Gov.UK>
Sent: 28 July 2021 09:11
To: Daniel Hyde <Daniel.Hyde@freeths.co.uk>
Subject: RE: Harlington Sports Ground - 2021/1971

Daniel,

Thanks for this.

In terms of committee, the Council's scheme of delegation, as regards applications in the Green Belt, officers only have authority for:-

'Determination of minor applications in the green belt at Brunel University, Harefield hospital and Mount Vernon hospital of up to 1000sq.m floorspace and determination of minor applications on other sites in the green belt where the floorspace is less than 200sq.m. all applications with a footprint of more than 200sqm to be determined by committee.'

Providing all matters with Sports England etc. are resolved, the very earliest committee date would be in September.

Regards,

Richard

From: Daniel Hyde <Daniel.Hyde@freeths.co.uk>
Sent: 27 July 2021 18:08
To: Richard Phillips <RPhillips@Hillingdon.Gov.UK>
Cc: Mark Harris <Mark.Harris@freeths.co.uk>
Subject: Harlington Sports Ground - 2021/1971

Good afternoon Richard,

I hope you are well.

In relation to the comments that you sent through a couple of weeks ago, we have formulated the following response:

Sport England

The pitch layout plan that we submitted has been updated to accurately show the location of the MUGA, there is no formal pitch in the location of the MUGA as it is just a supplementary floodlit area for training. Formalising this with a MUGA will be an improvement on the existing facilities and will not result in the loss of any pitches, nor will it limit the use of any nearby pitches. Imperial can confirm that the area where the MUGA will be located has never been used as a football or cricket pitch.

The pitch layout as submitted is representative of the Site year round, given QPR's use of the Site, it is very difficult to change / move the pitches throughout the year. As such, the plan that is presented as per the above, is accurate year-round. We have included an existing and proposed plan to make this clear,

Imperial will be allowing limited community usage through their commercial sport team, this will be focused on regular block bookings via schools or private bookings (i.e. local sports teams etc.). Imperial will not be in a position

to offer any ad hoc informal community use due to QPR being the current tenant of the Site as per their requirements.

Design Guidance

It is noted in the Sport England guidance around artificial lighting that LED lighting is not favourable for outdoor sports. However, it is noted that the guidance is 9 years old (published in 2012) and that it states in Appendix 2 that LED lighting solutions do not have enough output to light a MUGA. It is noted that you need approximately 400,000 lumens for a MUGA for football and around 800,000 lumens for a tennis court. The proposed lighting will provide 172,000 lumens per light (see submitted specification sheet), that in total will provide 1,032,000 lumens for the entire MUGA area (172,000 lumens x 6 floodlights) – therefore we consider that the floodlighting provided will be more than sufficient for the tennis courts and the netball courts that are provided at the MUGA.

The floodlights will be evenly spread across the entire MUGA to ensure there is even illumination throughout the entire playing surface and that those taking part will be able to see what is going on. In terms of any standby lighting if those proposed were to fail, there is mobile generator floodlights that can be placed around the outside of the MUGA, whilst this may not allow for the conclusion of matches, it may be possible to continue any training and allow for the safe exit from the MUGA with suitable illumination.

As can be seen from the submitted light spillage plan, there is minimal light spill from the Proposed Development, meaning there will be minimal impact on neighbouring pitches within the sports facility and also there are no neighbouring occupiers within close proximity to the Site, as such, there will be no nuisance on neighbouring occupiers to the Proposed Development. There are no other receptors close to the Site that would be effected by the floodlighting.

The MUGA is suitably located in order to minimise impacts from the floodlights on neighbouring occupiers, roads or other receptors and it is positioned adjacent to other floodlights and sports pitches that would mean the proposal will be seen against this background and be considered to assimilate well with its immediate surroundings, not having a detrimental impact on the amenity of the area in terms of its visual impact and any light glare or spillage.

As the proposed will provide for 1.032m lumens, it is considered that the minimum / recommended Lawn Tennis Association lighting standards will be met, as well as the recommended lumens for a netball court as part of a MUGA.

There is level and flat access to the MUGA which will allow access for all people.

As the proposal is for a MUGA, at an existing sports facility, consideration can only be given to the MUGA itself as opposed to the wider sports facility, changing rooms, services and other areas of the Site.

The playing surface will be a Type 3 surface insofar that the primary sports will be tennis and netball, requiring a surface that will rebound balls, it is considered that this is the most appropriate surface for the primary use of the MUGA.

As can be seen from the proposed plans, the MUGA will be located close to existing facilities and car park and will be accessible by those with disabilities. The location is well chosen so that it is minimising any disturbance to neighbouring occupiers and is a sufficient distance from the highway that it would not harm road safety from the new floodlights etc. The proposed location for the MUGA is ideal and flat and therefore will be perfectly suited to be located in this position.

Full drainage details have been provided with the application, showing the drainage to be installed and the channels that will drain the MUGA during rainfall. These will be connected to the nearest mains sewer.

The MUGA will be maintained continuously throughout the year to ensure that the playing surface will be in the highest possible quality and condition, this will be carried out by grounds staff who already care for the existing pitches and artificial pitches on the Site and therefore are well versed in what is required to care for this kind of surface.

Highways

In respect of car parking number, we have been advised by the grounds manager that there are 125 car parking spaces on the site. This includes approximately 73 formal spaces and whilst the remainder are not marked, they are fully usable and indeed are regularly used by visitors to the sports ground.

The relative inaccessibility of the site compared to more central London sites is acknowledged and reflected in our analysis and approach to vehicle reliance for trips to and from the site.

With regard to trip generation associated to the proposed MUGA, the comments of the Highway Authority are acknowledged, however it should be noted that owing to the COVID pandemic it has not been possible to obtain reliable 'first principles' data whilst the TRICS database has limitations in terms of available surveys for MUGAs and similar facilities. We have additionally conducted a search of planning applications for MUGA schemes, however this has not returned any survey data that would be fit for use at Harlington.

An alternative approach would be to use a TRICS output for '5-a-side football' and apply a factor of 3 pitches to reflect circa 30 players on the MUGA at any one time. This would equate comparably with the maximum 28 players attending netball games. The attached output (Ref: TRIPRATE14591) has been generated based on 3 survey sites with comparable accessibility credentials to the application site. The views of the Highway Authority are welcomed on these trip rates.

In terms of modal split, the attached output returns a slightly lower overall vehicle proportion compared to that produced for Tennis Clubs (74.7% vs. 80.7%). The '5-a-side football' trip rates would see a lower proportion of pedestrians (13.0% vs. 16.9%) in line with the Highway Authority's recommendations. The '5-a-side football' trip rates return a higher proportion of public transport trips compared to the Tennis Club output, however this is deemed realistic given the high frequency of bus services along Harlington High Street. Given the proximity of the residential populations in Harlington, South Hayes and West Cranford (totally circa 6,000) there is good potential for walking trips to and from the site for use of the MUGA by local patrons.

The Highway Authority comments conclude that due to concerns over the trip rates / modal split included in the Transport Statement, the car parking accumulation calculations are unsound. In this regard, the car park accumulation can be recalculated based on the attached revised TRICS output, however it should be recognised that such assessments are extremely robust given the MUGA will be primarily used by students from ICL or other universities. It is very unlikely that players will visit the site in individual cars and there will be greater propensity for trips by coach / minibus.

In the extremely unlikely event that car parking were displaced onto the adjacent public highway, there is unrestricted car parking of some 300m length along Sipson Lane immediately east and west of the site access, capable of accommodating 55 parked vehicles.

A dimensioned plan of the proposed cycle parking will be provided by the scheme architect and submitted under separate cover.

In respect of disabled and EV bays, no changes are proposed to overall parking supply and therefore there is no associated provision of disabled parking bays or EV facilities.

It is noted that a Travel Plan has been requested, however, as above, the site will be used predominantly by ICL and other universities (who already frequent the facility) and the majority will be travelling by organised transport which in itself represents a sustainable option, as opposed to single occupancy vehicle trips.

The further feedback of the Highway Authority is requested in relation to the above, following which any revised assessments can be provided.

GLAAS

The comments around potential remains are noted, will you be attaching a WSI condition to any approval?

Neighbour comment

Imperial recycle topsoil yearly, and it takes up to a year for topsoil to become re-usable and as such the bunds to the south of the Site as mentioned in the neighbour comment will be used this year. As nearly all of the northern part of the Site is playing pitches, Imperial cannot put the topsoil there as it would interfere with the day-to-day activities of the pitches. As such, Imperial consider the location to the south where the existing bunds are to be the most appropriate location, and the topsoil will only be in this location for approximately a year until such a time as to when it is re-usable again. I hope that clarifies this position.

I trust the above clarifies everything and responds to all comments raised that you sent to me.

I would appreciate it if you could confirm safe receipt of the attached and also confirm your timescales for determination of the application?

It would also be useful to understand the rationale behind the application being determined at committee given the limited objection to the scheme?

I look forward to hearing from you.

Kind regards

Dan

Daniel Hyde

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