
FREETHS

**IMPERIAL COLLEGE SPORTS GROUND, SIPSON LANE,
HARLINGTON, UB3 5EH**

TOWN PLANNING STATEMENT

**IN SUPPORT OF:
PROPOSED MULTI-USE GAMES AREA AND ASSOCIATED
DEVELOPMENT**

**ON BEHALF OF:
IMPERIAL COLLEGE LONDON**

MAY 2021

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1. INTRODUCTION

1.1. This Town Planning Statement is prepared by Freeths on behalf of Imperial College London (“the Applicant / ICL”) in support of a Planning Application for a new Multi-Use Games Area with associated development (“the Proposed Development” / “the MUGA”) on land known as Imperial College Sports Ground, Sipson Lane, Harlington (“the Site / Application Site”).

1.2. The description of development is as follows:

“Installation of Multi-Use Games Area and associated development”

1.3. The extent of the Application Site is identified on the Site Location Plan (Drawing Ref: Harlington Campus). The Proposed Development is identified on the Proposed Plans (Drawing Refs: S20-261/DWG/SP0001 Rev 04).

1.4. The Site is an existing sports facility that is in part leased by Queens Park Rangers Football Club as their training ground and used by the Applicant for sports purposes for students. The Site is located on the north side of Sipson Lane within the Harlington area of The London Borough of Hillingdon (“LBH”). The site and surrounding area are covered in more detail below.

1.5. The Applicant is seeking to install a MUGA on Site, this will include a 3m height chain link fence with two entrance points. The MUGA will also require the installing of 6no. 8m tall floodlights located on each corner of the MUGA and two halfway down on each side lengthways.

1.6. The purpose of this Statement is to provide an assessment of the Proposed Development against the Development Plan and other material considerations. The Statement sets out the following:

- **Section 2:** an overview of the Site and Surrounding Area.
- **Section 3:** summarises the Proposed Development.

- **Section 4:** outlines the Planning Policy of relevance to the Site and Proposed Development.
- **Section 5:** assesses the Proposed Development against the Planning Policy context.
- **Section 6:** provides a summary and conclusion.

- 1.7. This Statement, along with supporting plans, demonstrates that the Proposed Development is consistent with the overall National, Regional and Local planning policies. The Statement also demonstrates there are no material considerations that would warrant the application being refused.
- 1.8. This Statement should be read in conjunction with the submitted plans and documents which accompany the Planning Application as listed in the Covering Letter.

2. SITE AND SURROUNDINGS

The Site

- 2.1. The Site consists of a small area of amenity grassland which is currently used for sports training purposes in connection with the wider use of the Imperial College Sports Ground. The MUGA will be located just to the north of the main pavilion building, part of which is currently leased to QPR Football Club as their training facility.
- 2.2. The Site where the MUGA will be located is an area of closely mown amenity grassland with little landscape features or ecology importance due to its current use as part of the wider training facilities at the Sports Ground. The Site is flat and sits within Flood Zone 1.
- 2.3. The wider Imperial College Sports Ground site consists of a number sports pitches used throughout the year by ICL (please see plan ref: HARLCAMP-PLAN3). The wider Sports Ground also consists of a cluster of development, currently part of which is leased to QPR Football Club as their training facility. The main pavilion consists of the building itself with a number of later additions, a large car parking area and further storage facilities all associated with the use of the Site for sports activities. The wider Sports Ground area is generally flat, with little landscape or ecology features.
- 2.4. The main built form of the Site is located in and around the pavilion, which is a two storey building with single storey extensions. The additional storage facilities and ancillary developments are linked to the use of the wider Site as a sports facility.
- 2.5. The Site is located 400m to the west of Harlington and is accessible off Sipson Lane which gives direct access to High Street which runs through Harlington. The MUGA will be located to the north of the main pavilion building. The Site itself is on the north side of Sipson Lane and north of Heathrow Airport.

The Surrounding Area

- 2.6. The surrounding area is relatively mixed in its character, with the exception of Harlington to the east of the Site, the north and south of the Site are open fields with Little Harlington Playing Fields to the west. The M4 runs to the north of the Site and residential uses to the south beyond open fields which are also under ICL freehold ownership.

Planning History

- 2.7. Based on the planning history records website, there is limited planning history available for the Site which is of relevance to the Planning Application.

3. THE PROPOSED DEVELOPMENT

Proposed Scheme

- 3.1. The Proposed Development is for the installation of a MUGA which will be available for the use for tennis and netball (marked on the MUGA) but could be used other sports informally. The MUGA will be surrounded around the perimeter by a 3m high chain link fence with two entrance points. The chain link fence will be painted green in order to minimise any impact on the surrounding area.
- 3.2. The MUGA will be accompanied with 6no. 8m tall floodlights to allow for play on the MUGA to continue into the evening hours. The floodlights will also be painted green in order to minimise their impact on the surrounding area. The floodlights will be located in each corner of the MUGA and then two halfway along the longest sides. The lights to be installed will have a built in shield that will minimise the light spill from the LED lights. Along with the application we have submitted a specification sheet for the lights to be installed and a plan showing the light spillage as being contained in a very tight area around the MUGA (Drawing ref: HLS2191).
- 3.3. At present, the current floodlights are used up until 10pm, after which they are switched off, generally this is during the months of September to April, when outside of these months the floodlights are not generally required.
- 3.4. The MUGA will only be available to be used by students of ICL, primarily this will be for the University sports events when they compete against other Universities and for training purposes. The MUGA will not be readily available for hire from members of the public, as such, this will reduce the demand on the car parking area and highways conditions given its only use would be weekdays during university sports events and training.

- 3.5. There will be a small layer of top soil that will be removed for the purposes of laying the MUGA surface (approx. 250mm). This top soil will be removed from the Site and placed the south of Sipson Lane on land under ICL ownership. There is an existing bund in this area and this will be extended as part of the works for the MUGA. The bund cannot be placed in the surrounding area of the MUGA as this would take up additional grass space for other sporting activities that currently take place at the Site.
- 3.6. The Proposed Development will be accessible via the existing access arrangements, which will not be changed as part of this application. The scheme will be accessible via the existing built form, or via the footpath which runs between the existing hockey / astroturf pitch and the main pavilion building. There will be two access points to the MUGA, one to the south east corner and one to the north west.
- 3.7. The MUGA will include drainage below the surface which will channel water away from the surface, through to a new connection to the existing drainage systems on Site. A plan (ref: S20-261/DWG/DP0001 Rev 03) has been submitted to demonstrate the drainage channels to be included in the Proposed Development.
- 3.8. The Proposed Development's compliance with the Planning Policy context is addressed in Section 5.

4. PLANNING POLICY

- 4.1. This Section sets out planning policy and guidance which is of potential relevance to the Site and the Proposed Development and is that to which the LBH will have regard when determining the Planning Application.
- 4.2. Section 38 (6) of the Planning and Compulsory Act 2004, requires all planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3. The Development Plan consists of the LBH Local Plan: Part 1 (Strategic policies) & Part 2 (Development Management Policies) (Adopted November 2012 & January 2020 respectively) and the London Plan (March 2021).
- 4.4. The Application Site is identified on the Proposals Map as lying within the Metropolitan Green Belt (“MGB”) and an Archaeological Priority Zone.

The London Plan (March 2021)

- 4.5. The most recent version of the London Plan was adopted in March 2021 and sets out the regional spatial development strategy for London.
- 4.6. Policy D4 ‘Delivering good design’ – This policy places great emphasis on the quality of design of proposals and how mechanisms and processes can be put in place in order to achieve good design across London.
- 4.7. Policy S5 ‘Sports and recreation facilities’ – The policy ensures that all boroughs will be able to supply high quality sports and recreation facilities. The policy continues to state that existing sport and recreational facilities will be retained unless it can be demonstrated that they are surplus to requirements. Proposals for sports and

recreation facilities should increase or enhance their provision in accessible locations, maximise multiple use of the facilities and support provision of sports lighting within reasonable hours.

- 4.8. Policy HC1 'Heritage conservation and growth' – Here, developments should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and mitigation.
- 4.9. Policy G2 'London's Green Belt' – The Green Belt is afforded protection through this policy, and development proposals will not be approved unless there are Very Special Circumstances. In addition to this, scheme will be subject to the tests as set out in the NPPF to provide multi-functional beneficial uses for Londoners.
- 4.10. Policy G6 'Biodiversity and access to nature' – This policy ensures that development proposals do not have a detrimental impact on biodiversity and be informed by the best available ecological information.
- 4.11. Policy SI13 'Sustainable drainage' – This policy ensures that drainage hierarch is met where possible, with preference over green features rather than grey.
- 4.12. Policy T4 'Assessing and mitigating transport impacts' – This policy ensures that development proposals that developments that may have an impact on the transport network are fully assessed. It goes on to state that where appropriate mitigation should be incorporated including provisions for public transport, walking and cycling facilities and highways improvements.
- 4.13. Policy T6.4 'Hotel and leisure uses parking' – This policy confirms that in locations of PTAL 0-3 should be assessed on a case by case basis in terms of the provision of parking and should be consistent with the Healthy Streets Approach.

Local Planning Policy – Hillingdon Local Plan: Part 1 (November 2012)

- 4.14. The relevant policies of Part 1 of the Local Plan are summarised below. The Proposed Development is then assessed against the relevant provisions of these policies in the Planning Issues Section this Statement.
- 4.15. The Hillingdon Local Plan: Part 1 (“HLP1”) was adopted in November 2012. The Local Plan Policies Map confirms that the Site is in the MGB and an Archaeological Priority Zone.
- 4.16. Policy BE1 concerns the Built Environment and outlines the fact that all new development should protect the amenity of surrounding land and buildings, in particular residential properties.
- 4.17. Policy HE1 relates to heritage and highlights that LBH will conserve and enhance its distinct and varied environment, including the wider historic landscape. This includes Archaeological Priority Zones and Areas.
- 4.18. The Green Belt, Metropolitan Open Land and Green Chains are considered in Policy EM2. Here, LBH will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt. Development within the Green Belt will be assessed against national and regional planning policies, including the Very Special Circumstances test.
- 4.19. Policy EM5 concerns sport and leisure, LBH will safeguard, enhance and extend the network of sports and leisure spaces that meets community needs and facilitates active lifestyles. It will also promote LBH’s sport and leisure facilities to achieve more integrated public accessibility and active lifestyles. LBH will protect playing fields and recreational spaces and promote opportunities to participate in outdoor sport and leisure, LBH will also resist the loss of sport and leisure facilities.

- 4.20. Policy EM7 addresses biodiversity and geological conservation, ensuring that these are preserved and enhanced where possible, and where feasible biodiversity enhancements will be sought.

Local Planning Policy – Hillingdon Local Plan: Part 2 (January 2020)

- 4.21. Policy DMHB 7 considers Archaeological Priority Area and Zones and confirms that LBH will ensure that archaeological sites will not be disturbed. However, if this cannot be avoided, then satisfactory measures must be put in place to mitigate for impacts of the proposal through archaeological fieldwork to investigate and record remains in advance of development works.
- 4.22. Policy DMHB 11 relates to the design of new development, all development will be required to be designed to the highest standard and incorporate principles of good design. Including a number of principles included within the policy, which cover harmonisation with the local context and surrounding area, ensuring the use of high quality materials and protecting features of value, such as heritage assets. Proposals should not impact on the amenity, daylight and sunlight of neighbouring properties.
- 4.23. Development in the Green Belt or on Metropolitan Open Land is discussed in policy DMEI 4. LBH confirm inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are Very Special Circumstances.
- 4.24. Biodiversity protection and enhancement is secured through Policy DMEI 7, this ensures that appropriate surveys are submitted and proposals demonstrate that there will be no unacceptable effects of the development on biodiversity or geological values.
- 4.25. Policies DMCI 1 and DMCI 2 relate to the retention of existing community facilities and the creation of new community infrastructure respectively. This includes outdoor facilities that maximise the use of the facility, in particular to recreational and community uses.

- 4.26. Managing transport impact is covered in policy DMT 1, this requires any developments should meet its own transport needs and address any impacts through a Transport Assessment and Travel Plan if required.
- 4.27. Highways impacts are addressed through policy DMT 2 ensuring that developments should have safe and efficient access to the highway, that they do not contribute to the deterioration of air quality, noise or local amenity or safety. Developments must also be safe and secure for cyclists and pedestrians and impact on congestion are minimised. Suitable mitigation must be incorporated to address any impacts in terms of capacity and function of the highway.

Material Considerations

National Planning Policy Framework (NPPF, 2019)

- 4.28. The National Planning Policy Framework (“NPPF”) was first published in March 2012, then revised and re-issued in July 2018, then again in February 2019. The document sets out the Government’s planning policies for England and how these should be applied.
- 4.29. Paragraph 2 recognises that planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.
- 4.30. Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development which at a very high level can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.31. Paragraph 10 recognises that at the heart of the NPPF is a presumption in favour of sustainable development and paragraph 11 recognises that for decision-taking this means approving development

proposals that accord with an up-to-date development plan without delay.

4.32. The Proposed Development represents sustainable development for the purposes of the NPPF on the following grounds:

- **Economic:** is an efficient use of the Site that allows for greater operation and use to support the operations and activities of ICL.
- **Social:** the Proposed Development is linked to an existing sports facility and will further encourage the use of the Site for sporting activities as the Site will be used by ICL students and expands the sporting offer at the Site.
- **Environmental:** the Proposed Development retains and enhances the outdoor sporting nature of the Site.

4.33. On this basis if the Proposed Development can be demonstrated as being in accordance with the Development Plan it should be approved without delay consistent with paragraph 11 of the NPPF.

4.34. Paragraph 12 identifies that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations indicate that the plan should not be followed.

4.35. Chapter 8 requires planning policy and decisions to achieve healthy inclusive, and safe places, including the promotion of healthy lifestyles for example in proposals that would encourage walking and cycling, and the provision of sports facilities.

4.36. Chapter 13 relates to protecting Green Belt land, with paragraph 134 outlining the five purposes of the Green Belt. Chapter 13 continues at paragraph 145 which details a number of exceptions for development in the Green Belt. Part b of paragraph 145 states:

“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;”

- 4.37. Paragraph 189 of chapter 16 states where proposals include the potential for a development to affect an area of archaeological interest (amongst other heritage assets), developers should submit an appropriate desk-based assessment, and where necessary, a field evaluation.
- 4.38. Based on this assessment, we have identified that the Development Plan is up-to-date and broadly consistent with the Framework. We have also identified that the Proposed Development represents Sustainable Development for the purposes of the NPPF.

5. PLANNING CONSIDERATIONS

Policy Framework

- 5.1. Section 38 of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Principle of Development

Policy Approach

- 5.2. Policies S5 of the London Plan, EM5 of the Local Plan Part 1 and DMCI 1 and 2 of Local Plan Part 2 directly relate to the retention and creation of community infrastructure, which includes outdoor sporting facilities. The Proposed Development would be in accordance with the key drivers of these policies insofar that the scheme will seek to retain the use of the Site for sports, and in turn enhance and improve those facilities with the provision of a MUGA which can be used year round, and diversify the offer of sporting facilities at the Sports Ground.
- 5.3. The principle of the development lies in whether the Proposed Development is acceptable in relation to Green Belt policies. All local and regional policy points towards the NPPF in terms of the tests that need to be applied to any developments that are proposed in the Green Belt.
- 5.4. The key paragraph for this assessment is paragraph 145 of the NPPF. This details a number of exceptions to those forms of development that are inappropriate in the Green Belt. The exceptions include at sub-paragraph b: the provision of appropriate facilities in connection with an existing use for outdoor sport and recreation, providing that the facilities preserve the openness of the Green Belt. The MUGA can fall within this exception as a facility for outdoor sport and recreation in

connection with the existing use of land. To be considered acceptable, an assessment needs to be made on terms of whether the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

Appropriate Green Belt Facility

- 5.5. The Proposed Development is for a Multi-Use Games Area which will be situated on a small parcel of land just to the north of an existing pavilion which houses existing changing and gym facilities as well as physio treatment rooms and storage facilities all intrinsically linked to the wider use of the Sports Ground as a sports facility. The surrounding land to the Proposed Development include football and hockey pitches to the east, with a cricket pitch to the north as well as further football pitches. As such, there is a clear existing use at the facility as an outdoor sports venue, and the Site has been in such a use for a number of years.
- 5.6. The NPPF confirms that appropriate facilities in the Green Belt include provision for outdoor sport, as can be seen from the submitted pitch layout plan for Imperial Sports Ground, it is clearly demonstrated that the wider site, and the application Site itself, are appropriate facilities to be provided in the Green Belt given they are for the purposes of outdoor sports.
- 5.7. Situating the MUGA in this location specifically will mean it can directly link to the existing changing and ancillary facilities (shower and treatment rooms etc.). As such, whilst the Site is located in the Green Belt, this is out of absolute necessity so that it can be in connection with an existing lawful outdoor sporting use of the wider Imperial College Sports Ground site. As such, the Proposed Development is entirely in line with the requirements of paragraph 145 of the NPPF.
- 5.8. Therefore, it cannot be disputed that the Proposed Development is required to be in the Green Belt due to the wider Site being in use as an outdoor sports facility, and being intrinsically linked to that use.

Green Belt Purposes

5.9. There are five clear purposes to the Green Belt as per paragraph 134 of the NPPF, these include:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns;
and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.10. The wider Imperial College Sports Ground is located just outside of the built up area of Harlington, and within the Green Belt area around Heathrow Airport. The Proposed Development would be low lying, with the exception of the floodlights, and would not provide any excessive built form, with chain link fencing and floodlighting which will be painted green to minimise any harm on the openness.

5.11. The Proposed Development will clearly not increase the sprawl of the built up area of Harlington as it will be located very closely to existing development and not actually being a physical building in its own right. Therefore, the proposal will not merge Harlington towards Sipson to the west.

5.12. Furthermore, the wider area in which the Site is located cannot be considered to be countryside given its urban location with London. Therefore, the scheme would not encroach upon the countryside. The Proposed Development does not harm any settings or special character of historic towns. The final point of paragraph 134 as per the above is not of strict relevance, although the scheme will appropriately re-use the Site for continued sporting purposes.

5.13. Therefore, it is considered that the Site performs very well against the purposes of the Green Belt as per paragraph 134 of the NPPF.

Green Belt Openness

- 5.14. The Proposed Development is located to the north of the existing built form of the Site. As such, the MUGA is located close to the existing cluster of development, minimising its visual impact and intrusion into the open space. The floodlights will be the same height as the existing floodlights that serve the pitches to the east of the MUGA, therefore will assimilate well with the existing development and again, be close to the existing cluster of development.
- 5.15. Overall, the development is low lying (with the exception of the 6no. floodlights) with green chain link fencing surrounding its perimeter. As such, the visual impact of the MUGA itself would be minimal and blend in with its green surrounds. The floodlights will also be painted green in order to minimise their visual impact. As such, it is considered that the visual impact of the Proposed Development will be minimal given its nature, colour, scale and location to existing piece of development on Site. In turn, given there would be a minimal visual impact from the Proposed Development, there will not be a harmful impact on the openness of the Green Belt.
- 5.16. Therefore, given that the Proposed Development has been located in an area in close proximity to the existing built form, is low lying, and is relatively small in scale, mass and nature in relation to the wider Sports Ground, it is considered that the Proposed Development does not have a detrimental impact on the openness of the Green Belt.

Conclusion

- 5.17. The wider Imperial College Sports Ground is an existing lawful use as an outdoor sports facility, and the Proposed Development be intrinsically linked to that use. As such, given that the Proposed Development is an appropriate facility and will not harm the openness of the Green Belt, the scheme should be considered appropriate development in the Green belt. As such, the Proposed Development is

in accordance with paragraph 145, sub-paragraph b of the NPPF and all Local and Regional planning policies.

Impact on Highway Safety and Parking

- 5.18. The application is supported by a Transport Statement (add author and date) which details the additional trip attraction from the Proposed Development, as well as the ability for the existing arrangements to be able to facilitate any additional demand generated in terms of parking.
- 5.19. The Site will clearly be capable of allowing for the safe access, parking and exiting of coaches, and the additional trip attraction due to the MUGA would be well within the capacity of the local highway network, with minimal additional trips to the Site due to the fact that the MUGA will only primarily be accessible to students for use during University matches and for training purposes.
- 5.20. The submitted Transport Statement demonstrates that there will only be a small increase in demand on the parking spaces at the Site. The additional demand can easily be catered for within the existing car park due to the small increase in trip generation created by the MUGA. The scheme will also be provide with 18 Sheffield stands to provide for the required level of cycle parking as per the London Plan.
- 5.21. As the MUGA is will provide for only a small team based sports, it is not considered that there will be any increase in coaches visiting the Site. Most people using the MUGA will arrive via car / car sharing or through other means of travel. Therefore, the application has not been submitted with any swept path analysis for coaches given there will be no change from the current situation. The Transport Statement continues on this analysis in more detail with regards to the lack of additional coach trips.
- 5.22. As such, we expect that the highways network will not be detrimentally impacted upon by the Proposed Development due to its intended use for students, and given its size and use, for tennis and netball which require small teams / number of individuals. Highway safety will be

maintained and there will be a very minor increase in trips generated to the Site that can be accommodated for within the existing car park. Therefore, we do not considered there to be any harm from the Proposed Development in highways safety and parking. Therefore, the Proposed Development would be in accordance with London Plan policies T4 and T6.4 as well as Local Plan policies DMT 1 and 2.

Impact on neighbouring occupier's amenity

- 5.23. The nearest neighbouring occupiers to the Site are 200m to the east and are well screened with mature trees and vegetation and there is no direct line of sight.
- 5.24. It is appreciated that the Site will see an increase in terms of the use of the Site. However, we expect this increase to be minimal given that the MUGA will be for netball and tennis purposes, which does not require an intense amount of individuals and will mainly be used by students for training and competitive matches. As such, it is not considered that the inclusion of the MUGA on Site will give an appreciable increase in disturbance from the Site over and above the existing situation.
- 5.25. The Proposed Development will include 6no. 8m tall floodlight, again, these will be located in and amongst existing floodlights which serve the hockey and football pitches to the east. As such, it is not considered that the inclusion of the additional floodlights on Site will have any detrimental impact on the amenities of the nearest residential occupiers given the existing situation. Furthermore, the light spill plan that has been provided as part of this application (Plan Ref: HLSSL2191) clearly shows how the Proposed Development will only have a small light spill within a few metres of the MUGA itself, which will clearly not spill into neighbouring occupiers gardens / homes. Furthermore, the floodlights will be directed down towards the MUGA and as such, the glare from the LED lights will be directed away from the direct line of Site from the neighbouring residential properties.

- 5.26. Therefore, the Applicant believes that there will be no detrimental impact on the amenities of neighbouring residential occupiers to the Proposed Development given the significant separation distance, the use of the MUGA and that it will be in amongst existing sports development at the Site. As such, the Proposed Development will have an acceptable effect on the neighbouring residential occupiers' amenities, and in turn being in compliance with Local Plan policies BE 1 and DMHB 11.

Ecology

- 5.27. A Phase 1 Ecology Survey has been undertaken by Ecology Solutions to ascertain any harm with regards to the loss of the soft landscaped area, the surrounding area and the proposed floodlights.
- 5.28. The Proposed Development is situated on improved grassland that has been well managed for sport purposes. As such, there is no sign of any species in this area. In addition, there is a further small area of improved grassland to the south, which has very little ecological value.
- 5.29. There are two main permanent floodlights that face towards the Proposed Development on Site already, there is a further portable flood light that is also presently facing the area where the MUGA will be located. In addition to this, there are also a number of flood lights to the east of the Site. As such, there is already a heavy presence of artificial light at the Site, therefore, this will be formalised through the Proposed Development and it is not considered that there would be any harm to commuting or foraging bats.
- 5.30. The ecology survey also found that the existing pavilion building is of a good condition and as such there are no signs of roosting bats or nesting birds, therefore no further surveys are suggested.
- 5.31. Overall, the Site is of low ecological value and therefore it is not considered that there will be a detrimental impact on protected species through the Proposed Development. The Proposed Development is

therefore in accordance with Local Plan policies DMEI 7 and EM7 and London Plan policy G6.

Other Matters

Archaeology

- 5.32. The Site lies within the Heathrow Archaeological Priority Zone, whilst this would in other circumstances require an archaeological report. However, given the nature of the scheme being a low depth development and the Site being part of a landfill historically, it is highly unlikely that any archaeological remains would be affected by the proposal.

Drainage

- 5.33. The Proposed Development is not located in an area that is at risk of flooding. However, given the nature of the scheme, drainage has been taken into account and drainage channels are to be included below the surface of the MUGA to ensure surface water is adequately dealt with and that there will be no increased flood risk elsewhere away from the Site.

Contaminated Land

- 5.34. As described above, the Site is a former landfill site which ended in 1992. Following previous investigations close to the Proposed Development, there were low concentrations of landfill gas. Any recommendation for approval can include a condition to ensure that any soil is laboratory tested to ensure its suitability for use.

Air Quality

- 5.35. The Site is located in the Hillingdon Air Quality Management Area. The Transport Assessment has found that there will be minimal additional trips to the Site thanks to the use of the MUGA, as such there is not

considered to be a material increase in trips to the Site that would detrimentally harm the air quality of the local area.

6. CONCLUSIONS

- 6.1. The Proposed Development has been located in such a way across the Site that it is close to the existing buildings and sports facilities in order to minimise its impact on the openness of the Green Belt and surrounding area.
- 6.2. Furthermore, the Proposed Development is clearly and intrinsically linked to the Site's existing lawful use as a sports facility, and has been in such a use for a number of years. The MUGA will utilise the existing changing facilities at the Site and as such is required to be in this location to benefit from those. In addition, the chain link fencing and floodlights will be painted green in order to assimilate better with the surrounding area and background landscape. Therefore, we consider that the Proposed Development accords with paragraph 145b of the NPPF and as such in principle is acceptable development in the Green Belt.
- 6.3. It has also been demonstrated that the Proposed Development is acceptable in all other respects.
- 6.4. On this basis the Proposed Development should be approved without delay.