

# **Planning Policy Statement**

**For**

**The Construction of Natural Football Pitches Using Imported  
Soils Approved For Use By The Environment Agency.  
Proposals Include Rainwater Harvesting Scheme, Extensive  
Planting & Habitat Creation**

**at**

**Middlesex Stadium,  
Breakspear Road, Ruislip HA4 7SB**

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**16 August 2024**

**Version 1**



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# 1. PLANNING POLICY CONSIDERATIONS

The following section outlines the consistencies between the proposal at Middlesex Stadium and the applicable policies of the revised National Planning Policy Framework and Hillingdon Local Plan (2012).

## 1.1. National Planning Policy Framework (NPPF)

The following policies are of relevance to this proposal:

### 1.1.1. Achieving Sustainable Development (Chapter 2)

- 7. The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.*
- 8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

  - a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
  - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
  - c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*
- 9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.*
- 10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.*
- 11. Plans and decisions should apply a presumption in favour of sustainable development.*

### **1.1.2. Consistencies between Proposal and Chapter 2**

The proposal is consistent with Chapter 2 of the NPPF in the following ways:

Economic Role – providing a self-funding facility for use by members visitors to the football club.

Social Role – providing modern pitches that will encourage the maximum leisure developmental outcomes with the benefits to health and wellbeing associated with this.

Environmental Role – ensuring that the existing natural environment is not harmed.

In a sporting context, this proposal seeks to:

- Provide opportunities for the local community and sports organisations to participate in sport and physical activity for health improvement and development of their skills, particularly amongst low participant groups;
- Operate in line with the national agenda for sport taking into account nationally adopted strategies;
- Generate positive attitudes in sport and physical activity by young people and reducing the dropout rate in sports participation with age;
- Increase the number of people of all ages and abilities participating in sport and physical activity including people with disabilities;
- Use the facilities to encourage the range, quality and number of sports club links and to stimulate competition that is inclusive of young people and adults;
- Provide affordable access to the facilities and to be self-financing in terms of community use;
- Contribute to Sport England and Football Association strategic objectives for grassroots football development;
- Satisfy competition play and training needs with a robust sustainable business plan to monitor the delivery of the football development plan on a regular basis. The owner will review a variety of objectives and controls to correctly manage, adequately operate and maintain the facility;

#### **Maintenance Considerations and Sustainability / Energy and Waste Reduction**

The proposed development will require the development of part of the site for design and sustainability gains. A variety of efficiencies will be applied to the construction and operation stages to mitigate environmental impact and benefit the carbon footprint of the development.

Significant reduction in the use of energy and / or water, and reduce waste in the construction and operation of the facility will be achieved by:

- Excavations limited to the removal of turf and topsoil only.
- Imported recovered soil (re use of a waste material)
- The implementation of the water harvesting scheme.

In conclusion the proposals will expand and improve the existing club facilities with:

- Better quality provision
- Provide access to greater quantity of provision
- In a suitable location
- Supported by effective and appropriate management arrangements
- Implemented with best practice construction techniques to minimise waste and pollution

### **1.1.3. Building a strong, competitive economy (Chapter 6)**

**85.** *Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.*

#### ***Supporting a prosperous rural economy***

**88.** *Planning policies and decisions should enable:*

**(d)** *the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*

**89.** *Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.*

#### **1.1.4. Consistencies between Proposal and Chapter 6**

The proposal is consistent with Chapter 6 of the NPPF in the following ways:

- a. The proposal adds economic robustness to an existing leisure facility, in that it provides an increased number of pitches for use and therefore increased revenue. The variety of pitches sizes also broadens the market to a wider age group and ability and therefore increased participation.
- b. The ground modelling is simple and while there will be bank slopes around the pitches these will not be to the detriment of the surrounding landscape.
- c. The enhanced facilities will meet the needs local community . Its location on the urban fringe of Ruislip make it ideally located for sustainable access, without impacting on local roads.

### 1.1.5. Promoting healthy and safe communities (Chapter 8)

**96.** *Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

- a)** *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- b)** *are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
- c)** *enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*

**97.** *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- a)** *plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- b)** *take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
- c)** *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*
- d)** *ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and*
- e)** *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.*

#### **Open space and recreation**

**102.** *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, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.*

### **1.1.6. Consistencies between Proposal and Chapter 8**

The proposal is consistent with Chapter 8 of the NPPF in the following ways:

The proposal is consistent with Chapter 8 of the NPPF in the following ways:

Whilst it is acknowledged the proposed development would result in a change to the landscape, it must be noted that the proposal would provide a year-round sport and leisure facility that would facilitate social interaction and encourage exercise throughout the day and year.

In addition, consideration must be given to the importance of the standard of design and compatibility of a proposal to harmonise with the existing character of the area in which it is set.

Middlesex Stadium's proposal is consistent with Chapter 8 of the NPPF as it will deliver genuine beneficial outcomes in the following ways:

Promote healthy lifestyles by providing social and recreational facilities;

Provide access to a high quality open space and opportunities for sport and recreation that can make an important contribution to the health and wellbeing of the local community;

Better sporting provisions, a more attractive and ecologically diverse facility with a sustainable water supply will provide a genuine asset for the Club, local community sporting groups and organisations;

Provide a clean, safe and modern facility to inspire sporting participation and will enhance the existing sport and recreation provision in the area;

The proposed development will encourage social interaction and inspire more people of all ages to participate in sport;

The proposal will be sited close to onsite facilities and near to the town of Ruislip; providing convenient access for all visitors;

A facility such as the one proposed can play an important role in facilitating social interaction and creating healthy, inclusive communities;

The football club is an important leisure amenity and any proposals to improve its quality and attraction as a provision for the public to undertake a recreational activity should be supported. Its function as a high quality facility that suits all ages wishing to play the game is particularly important; and

Middlesex Stadium is just the type of facility that attracts and nurtures young talent for the future. It will be able to provide training and playing facilities at an affordable level and in an environment that is in no way elitist. The approval of the

remodelling proposals will allow the facility to continue to develop as a centre of excellence.

#### **1.1.7. Promoting sustainable transport (Chapter 9)**

**108.** *Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- (a)** *the potential impacts of development on transport networks can be addressed;*
- (b)** *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- (c)** *opportunities to promote walking, cycling and public transport use are identified and pursued;*
- (d)** *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- (e)** *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

**111.** *If setting local parking standards for residential and non-residential development, policies should take into account:*

- (a)** *the accessibility of the development;*
- (b)** *the type, mix and use of development;*
- (c)** *the availability of and opportunities for public transport;*
- (d)** *local car ownership levels; and*
- (e)** *the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*

#### ***Considering development proposals***

**115.** *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

**116.** *Within this context, applications for development should:*

- (a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- (b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- (c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- (d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- (e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

**117.** All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

#### **1.1.8. Consistencies between Proposal and Chapter 9**

The proposal is consistent with Chapter 9 of the NPPF in the following ways:

The facility is part of an existing football club and close to Ruislip with a bus stop opposite the entrance.

The road is a wide B road with long visibility splays and ample “runoff” driveway that leads to the car park. The existing is large and able to accommodate any increased parking requirement.

#### **1.1.9. Making effective use of land (Chapter 11)**

**123.** Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.

**124.** Planning policies and decisions should:

**(a)** encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

**(b)** recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;

### **Achieving appropriate densities**

**128.** Planning policies and decisions should support development that makes efficient use of land, taking into account:

**(a)** the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

**(b)** local market conditions and viability;

**(c)** the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

**(d)** the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

**(e)** the importance of securing well-designed, attractive and healthy places.

### **1.1.10. Consistencies between Proposal and Chapter 11**

The proposal is consistent with Chapter 11 of the NPPF in the following ways:

The application area is not being used as it was not suitable for football pitches in its current state. The new pitches will be an effective use of land while at the same time protect and enhance the environment via the extensive planting scheme.

### **1.1.11. Achieving well-designed and beautiful places (Chapter 12)**

**131.** The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

**135.** Planning policies and decisions should ensure that developments:

- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

**137.** Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

**139.** Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes. Conversely, significant weight should be given to:

- (a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes; and/or*
- (b) 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.*

### **1.1.12. Consistencies between Proposal and Chapter 12**

The proposal is consistent with Chapter 12 of the NPPF in the following ways:

The proposal reflects the immediate surroundings which are primarily football pitches.

The site will contain significant native planting and access for the general public to a landscaped setting.

The character of the site is already one of football pitches which is not changing but will also include additional planting.

The proposal will only increase its popularity as a sporting , health giving centre for all ages and backgrounds

A water harvesting scheme is being proposed to add to the sustainability credentials of the scheme.

### **1.1.13. Protecting Green Belt land (Chapter 13)**

#### ***Proposals affecting the Green Belt***

**152. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.**

**153. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. '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.**

### **1.1.14. Consistencies between Proposal and Chapter 13**

The proposal is consistent with Chapter 13 of the NPPF in the following ways:

The proposals are in accordance with the National Planning Policy Framework (NPPF), facilities for outdoor sport and recreation that maintain the openness of the Green Belt and is considered an appropriate development.

Specifically, paragraph 154 (b) of the NPPF supports the provision of such facilities "the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and outdoor recreation as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Paragraph 155 permits changes in land use for outdoor sport and recreation without being classed as inappropriate development in the Green Belt.

### **1.1.15. Meeting the challenge of climate change, flooding and coastal change (Chapter 14)**

**162.** *In determining planning applications, local planning authorities should expect new development to:*

- a)** *comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*
- b)** *take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.*

**173.** *When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*

- a)** *within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b)** *the development is appropriately flood resistant and resilient;*
- c)** *it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d)** *any residual risk can be safely managed; and*
- e)** *safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

**174.** *Applications for some minor development and changes of use should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 50.*

**175.** *Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:*

- a)** *take account of advice from the lead local flood authority;*
- b)** *have appropriate proposed minimum operational standards;*
- c)** *have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
- d)** *where possible, provide multifunctional benefits*

### **1.1.16. Consistencies between Proposal and Chapter 14**

The proposal is consistent with Chapter 14 of the NPPF in the following ways:

Middlesex Football Stadium proposals are consistent with Chapter 14 of the NPPF (2019) in the following ways:

The FRA produced by Cora IHT has addressed all the matters concerning surface water runoff and flood compensation;

The water harvesting proposal accords with all the principals of planning for climate change (increased droughts, flooding etc.);

The proposal encourages the reuse of existing resources by reusing material and rainwater;

A positive surface water drainage scheme and subsurface land drainage plan for the football pitches (comprising UPVC perforated carrier and lateral pipe drains) will drain and catch water for reuse; and

The proposed existing SUD system provides attenuation and the extensive planting plan will contribute to a low carbon future.

#### **1.1.17. Conserving and Enhancing the Natural Environment (Chapter 15)**

**180.** *Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- (a)** *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- (b)** *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- (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;*
- (e)** *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- (f)** *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

##### **Habitats and biodiversity**

**185.** *To protect and enhance biodiversity and geodiversity, plans should:*

- (a)** *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity 65 ; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation 66 ; and*
- (b)** *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

**186.** *When determining planning applications, local planning authorities should apply the following principles:*

- (a)** *if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

**(d)** development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

**188.** The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

**191.** Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- (a)** mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- (b)** identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- (c)** limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

**192.** Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

**193.** Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

**193.** The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

### **1.1.18. Consistencies between Proposal and Chapter 15**

The proposal is consistent with Chapter 15 of the NPPF in the following ways:

Middlesex Stadium's redevelopment proposal is consistent with Chapter 15 of the NPPF in the following ways:

The proposal protects and enhances the landscape by providing more green space for outdoor leisure;

Net gains are provided for biodiversity through habitat protection, creation and connectivity;

The proposal is appropriate for its location and will integrate with existing businesses and community facilities that the site has been used for for a number of years. It is in harmony with existing businesses, surrounding activities and community facilities;

It is considered that the proposal will not contribute to noise or light pollution and control measures will be in place to protect against possible dust and noise impacts during the construction phase of the project;

No adverse impacts on health or quality of life are expected; rather this proposal will contribute to well-being;

The proposal will continue to integrate effectively with existing businesses and community facilities as it is considered that this proposal is an acceptable use of land and no change of use is required due to the existing pitch facilities;

While it is acknowledged that the application proposal could result in increased use of the sports facility, noise from this extended activity is not an issue.

Some additional noise from children / adults on the pitches such as shouting may be evident but in terms of impact on receptors and landscape quality it would be negligible.

#### **Comments and Discussion:**

At present, football is played on the existing site throughout the year. It should therefore be noted that a certain level of activity already impacts on neighbouring residents in terms of low level noise.

Graded land and open areas of grass are in keeping with the football environment. When complete, the visual appearance will be similar to existing fine sports turf and trees character of the site.

In terms of the visual impact of the grading works, there will be grassed banks, open flat areas of grass and native trees. Whilst it represents a change in the

current landscape, it is a sporting / football landscape that is visually expected and already in existence on the site.

The proposals accord with good design and safety practice and represent the minimum required to achieve the design and safety desires of the brief. On this basis, it is considered that the proposals are complimentary to the built features within Middlesex Stadium and will not compromise the views from any onlookers.

## 1.2. London Borough of Hillingdon Local Plan

### 1.2.1. The relevant policies of Hillingdon Local Plan: Part 1 - Strategic Policies include:

#### 1.2.1.1. Policy E7: Raising Skills

*The Council will ensure a range of training and employment opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs and green jobs in the borough with higher education courses. The Council will promote Hillingdon as a destination for visitors and tourists and ensure that local residents have access to jobs within related industries.*

#### 1.2.1.2. Consistencies between Proposal and Policy E7

The proposal is consistent in the following ways:

The new proposals will provide local opportunities for work during the construction period in the form of machine operators, labour and technicians.

On completion of the pitches there will be opportunities for additional coaches and fitness professionals together with an environment for trainee referees to develop their skills and experience.

#### 1.2.1.3. Policy BE1: Built Environment

*The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:*

- 2 *Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;*
- 5 *Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;*
- 7 *Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;*
- 8 *Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and*

*arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;*

#### **1.2.1.4. Consistencies between Proposal and Policy BE1**

The proposal is consistent in the following ways:

The proposal reflects the immediate surroundings which are primarily football pitches.

The site will contain significant native planting and access for the general public to a landscaped setting.

The character of the site is already one of football pitches which is not changing but will also include additional planting.

The proposal will only increase its popularity as a sporting , health giving centre for all ages and backgrounds

A water harvesting scheme is being proposed to add to the sustainability credentials of the scheme.

#### **1.2.1.5. Policy EM1 Climate Change Adaption and Mitigation**

*The Council will ensure that climate change mitigation is addressed at every stage of the development process by:*

- 2** *Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.*
- 3** *Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.*
- 7** *Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.*

*The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:*

- 10** *Locating and designing development to minimise the probability and impacts of flooding.*

#### **1.2.1.6. Consistencies between Proposal and Policy EM1**

The proposal is consistent in the following ways:

Refer to the consistencies set out in 1.1.16

#### **1.2.1.7. Policy EM2: Green Belt, Metropolitan Open Land and Green Chains**

*The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Notwithstanding this, Green Chains will be reviewed for designation as Metropolitan Open Land in the Hillingdon Local Plan: Part*

2- Site Specific Allocations LDD and in accordance with the London Plan policies.

Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

#### **1.2.1.8. Consistencies between Proposal and Policy EM2**

The proposal is consistent in the following ways:

Refer to the consistencies set out in 1.1.14

#### **1.2.1.9. Policy EM5: Sport and Leisure**

*The Council will:*

- *Safeguard, enhance and extend the network of sport and leisure spaces that meet local community needs and facilitate active lifestyles by providing active sport and leisure spaces within walking distance of home. Ensure that the overall borough-wide target, identified in the Open Space Strategy, of active sport and leisure facilities with unrestricted access is maintained. There will be a presumption against any net loss of active sport and leisure facilities in the borough.*
- *Ensure that future development includes features that designs activity into areas, providing opportunities for improved cycle ways, formal and/or informal local sports facilities, to encourage participation in a more active lifestyle. Adopt a flexible approach to the provision of facilities that recognises changing demographics in the population and trends in sports participation. Ensure that sufficient children's play space is provided to support proposals for new residential development, in accordance with national and local guidance. Promote Hillingdon's sport and leisure facilities to achieve more integrated public accessibility and active lifestyles. Identify where appropriate new opportunities for sport and leisure and measures to deliver them. Major development may be required to make contributions in order to minimise the impacts and pressures on the existing resource.*

#### **1.2.1.10. Consistencies between Proposal and Policy EM5**

The proposal is consistent in the following ways:

Refer to the consistency set out in 1.1.6 (Chapter 8).

#### **1.2.1.11. Policy EM6: Flood Risk Management**

*The Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF).*

*The subsequent Hillingdon Local Plan: Part 2 -Site Specific Allocations LDD will be subjected to the Sequential Test in accordance with the NPPF. Sites will only be allocated within Flood Zones 2 or 3 where there are overriding issues that outweigh flood risk. In these instances, policy criteria will be set requiring future applicants of these sites to demonstrate that flood risk can be suitably mitigated.*

*The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.*

#### **1.2.1.12. Consistencies between Proposal and Policy EM6**

The proposal is consistent in the following ways:

Refer to the consistencies set out in 1.1.16 (Chapter 14)

#### **1.2.1.13. Policy EM7: Biodiversity and Geological Conservation**

*The Council will review all the Borough grade Sites of Importance for Nature Conservation (SINCs). Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority. Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:*

- 2** *The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.*
- 7** *The provision of biodiversity improvements from all development, where feasible.*
- 7** *The use of sustainable drainage systems that promote ecological connectivity and natural habitats.*

#### **1.2.1.14. Consistencies between Proposal and Policy EM7**

The proposal is consistent in the following ways:

Refer to the consistencies set out in 1.1.17 Chapter 15 .

#### **1.2.1.15. Policy EM8: Land, Water, Air and Noise**

##### **Water Quality**

*The Council will seek to safeguard and improve all water quality, both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority along with the:*

- *River Colne*
- *Grand Union Canal*
- *River Pinn*
- *Yeading Brook*
- *Porter Land Brook*
- *River Crane*
- *Ruislip Lido*

##### **Air Quality**

*All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.*

### **Noise**

*The Council will investigate Hillingdon's target areas identified in the Defra Noise Action Plans, promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected. 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.*

### **Water Resources**

*The Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. For residential developments, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day.*

#### **1.2.1.16. Consistencies between Proposal and Policy EM8**

The proposal is consistent in the following ways:

There will be no detrimental impact on water quality as a result of the proposals. During construction works a CEMP will be strictly adhered to by the contractor to ensure no pollution incidents occur.

There will be no impact on air quality as a result of operation of the facility. A dust management plan will be strictly adhered to by the contractor building the facilities.

While it is acknowledged that the application proposal could result in increased use of the sports facility, noise from this extended activity is not an issue.

Some additional noise from children / adults on the pitches such as shouting may be evident but in terms of impact on receptors and landscape quality it would be negligible

#### **1.2.1.17. Policy EM11: Sustainable Waste Management**

*The Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy. The Council will follow the waste hierarchy by promoting the reduction of waste generation through measures such as bioremediation of soils and best practice in building construction.*

*The Council will promote using waste as a resource and encouraging the re-use of materials and recycling. The Council will also support opportunities for energy recovery from waste and composting where appropriate.*

#### **1.2.1.18. Consistencies between Proposal and Policy EM11**

The proposal is consistent in the following ways:

The use of recycled (recovered) soil for the proposed engineering works is a sustainable and efficient re use of " recovered" materials.

The use of recovered materials to regrade the site of the football pitches will assist a local business and community in the Ruislip area.

#### **1.2.1.19. Policy T1: Accessible Local Destinations**

*The Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.*

#### **1.2.1.20. Consistencies between Proposal and Policy T1**

The proposal is consistent in the following ways:

The site is already a successful football centre and located such that it is easily accessible by walking , cycling and bus (nearby bus stop opposite entrance)

#### **1.2.1.21. Policy CI1: Community Infrastructure Provision**

*The Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by:*

- 2 Supporting the retention and enhancement of existing community facilities;**

#### **1.2.1.22. Consistencies between Proposal and Policy CI1**

The proposal is consistent in the following ways:

Middlesex Stadium is already an important facility in the area and therefore the proposals will only enhance the community and social infrastructure

#### **1.2.1.23. Policy CI2: Leisure and Recreation**

*The Council will, in partnership with other bodies, seek to secure good quality, well maintained leisure and recreation facilities to address identified deficiencies and meet the needs of local communities, particularly deprived groups, by:*

- *Safeguarding the existing viable leisure and recreational facilities and supporting proposals for new and improved facilities;*
- *Seeking to improve the geographical spread of leisure and recreational facilities across the borough by:*
  - *Improving and upgrading facilities to both modernise and maximise their capacity to meet current leisure trends and demands including refurbishment of Highgrove Pool, extension of facilities at Minet cycle track and Hillingdon Sports & Leisure Complex;*
  - *Increased and improved facilities for specialist sports facilities to accommodate year round provision and standard of competition where local need can be identified. Such potential opportunities currently include indoor tennis courts, velodrome facilities and indoor bowls;*
- *Encouraging shared use of private leisure and recreational facilities;*
- *Capitalising on opportunities to supply new sporting and associated facilities in the borough to support the legacy of the 2012 Olympics;*
- *Seeking new and existing developments to promote the need to have inclusive and accessible design, to tackle climate change and to include facilities that promote sustainable transportation.*

#### **1.2.1.24. Consistencies between Proposal and Policy CI2**

The proposal is consistent in the following ways:

The new pitches will help safeguard the recreational facilities of the area.

The pitches will be of a high standard and provide a year round provision from all backgrounds and abilities.

Climate change and sustainability are considered in the form of the proposed rainwater harvesting scheme

**1.2.2. The relevant policies of Hillingdon Local Plan: Part 2 – Development Management Policies include:**

#### **1.2.2.1. Policy DMHB 11: Design of New Development**

A. *All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:*

- i. harmonising with the local context by taking into account the surrounding:*
  - *scale of development, considering the height, mass and bulk of adjacent structures;*
  - *architectural composition and quality of detailing;*
  - *local topography, views both from and to the site; and*
  - *impact on neighbouring open spaces and their environment.*
- ii. ensuring the use of high quality building materials and finishes;*
- iii. ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;*
- iv. protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and*
- v. landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.*

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

C. *Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.*

D. *Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.*

#### **1.2.2.2. Consistencies between Proposal and Policy DMHB 11**

The proposal is consistent in the following ways:

The proposals will not adversely impact on the neighbouring open space and its environment.

The proposed planting will protect and enhance the existing features on the site and in time increase biodiversity.

### **1.2.2.3. Policy DMHB 14: Trees and Landscaping**

- A. *All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.*
- B. *Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.*
- D. *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. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.*

### **1.2.2.4. Consistencies between Proposal and Policy DMHB 14**

The proposal is consistent in the following ways:

There is no tree clearing proposed on the site and proposed ground works will be outside of the RPA's of any nearby trees.

As part of the BNG for the site a number of habitats will be created through an extensive planting scheme

### **1.2.2.5.**

### **1.2.2.6. Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land**

- 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:*
  - ii. the proportion of the site that is already developed;*
  - v. the relationship of the proposal with any development on the site that is to be retained; and*
  - v. the visual amenity and character of the Green Belt and Metropolitan Open Land.*

### **1.2.2.7. Consistencies between Proposal and Policy DMEI 4**

The proposal is consistent in the following ways:

The proposals are in accordance with the National Planning Policy Framework (NPPF), facilities for outdoor sport and recreation that maintain the openness of the Green Belt and is considered an appropriate development.

Specifically, paragraph 154 (b) of the NPPF supports the provision of such facilities "the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and outdoor recreation as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Paragraph 155 permits changes in land use for outdoor sport and recreation without being classed as inappropriate development in the Green Belt.

#### **1.2.2.8. Policy DMEI 7: Biodiversity Protection and Enhancement**

- A. The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.*
- B. If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.*
- D. Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.*

#### **1.2.2.9. Consistencies between Proposal and Policy DMEI 7**

The proposal is consistent in the following ways:

There is no tree clearing proposed on the site and proposed ground works will be outside of the RPA's of any nearby trees. A small area of scrub will need to be cleared to enable the completion of the works.

As part of the BNG for the site a number of habitats will be created through an extensive planting scheme.

#### **1.2.2.10. Policy DMEI 10: Water Management, Efficiency, and Quality**

- C. Rain Gardens and non householder development should be designed to reduce surface water run-off rates to Greenfield run-off rates.*
- D. Schemes for the use of SuDS must be accompanied by adequate arrangements for the management and maintenance of the measures used, with appropriate contributions made to the Council where necessary.*
- E. Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.*
- F. Developments should be drained by a SuDS system and must include appropriate methods to avoid pollution of the water environment. Preference should be given to utilising the drainage options in the*

*SuDS hierarchy which remove the key pollutants that hinder improving water quality in Hillingdon. Major development should adopt a 'treatment train' approach where water flows through different SuDS to ensure resilience in the system.*

**Water Efficiency**

G. *All new development proposals (including refurbishments and conversions) will be required to include water efficiency measures, including the collection and reuse of rain water and grey water.*

**Water and Wastewater Infrastructure**

J. *All new development proposals will be required to demonstrate that there is sufficient capacity in the water and wastewater infrastructure network to support the proposed development. Where there is a capacity constraint the local planning authority will require the developer to provide a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered.*

**1.2.2.11. Consistencies between Proposal and Policy DMEI 10**

The proposal is consistent in the following ways:

A rainwater harvesting scheme is proposed which will take excess runoff from the new pitches to the storage area ( SUD ) for use as required for irrigation, cleaning etc.

The proposals set out in the FRA will ensure that there is no increase in runoff rates outside of the site.

**1.2.2.12. Policy DMEI 11: Protection of Ground Water Resources**

*All development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and demonstrate that these would be protected throughout the construction and operational phases of development.*

#### **1.2.2.13. Consistencies between Proposal and Policy DMEI 11**

The proposal is consistent in the following ways:

The CEMP for the project will be strictly adhered to by the build contractor to ensure there are no pollution events

#### **1.2.2.14. Policy DMEI 13: Importation of Waste Material**

*A. Development proposals that include the importation of waste material (inert or otherwise) must be accompanied by a monitoring plan that includes:*

- i. the amount and types of material to be imported;*
- ii. the timetable for disposal;*
- iii. onsite precautions to be taken to ensure only authorised vehicles and waste will be allowed on to site; and*
- iv. methods for reviewing and reporting on the progress of the disposal to the Local Planning Authority.*

*B. On commencement of the disposal operation the applicant will provide a written report in accordance with A) iv) above that provides details of:*

- i. the types and quantities of waste that have been imported, including carrier notices where appropriate;*
- ii. the source of the waste imported to the site;*
- iii. appropriate details of the company/companies importing the material; and*
- iv. updates in accordance with A) iv) pertaining to the progress of material importation and disposal in compliance with the approved plans.*

*C. Where assurances cannot be given that the appropriate protection and safeguards can be implemented, then the Council will expect the applicant to provide contingency plans including providing security bonds (through legal agreements) to ensure any subsequent harm can be remediated and the site made good.*

*D. Proposals that include the importation of waste materials (inert or otherwise) that are not accompanied by the appropriate level of controls or safeguards will not be supported.*

#### **1.2.2.15. Consistencies between Proposal and Policy DMEI 13**

The proposal is consistent in the following ways:

A detailed importation statement will be submitted to the Environment Agency for approval should planning permission be given for the proposals

#### **1.2.2.16. Policy DMEI 14: Air Quality**

*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 improvement of air quality, especially within the Air Quality Management Area.

#### **1.2.2.17. Consistencies between Proposal and Policy DMEI 14**

The proposal is consistent in the following ways:

There would be no detrimental impact on air quality as a result of the pitches being approved.

During the construction process a dust management plan will be put in place to ensure no unacceptable impact on local receptors

#### **1.2.2.18. Policy DMIN 4: Re-use and Recycling of Aggregates**

- A. *The Council will promote the recycling of construction, demolition and excavation waste.*
- B. *All developments will be encouraged to:*
  - i. *recycle and re-use construction, demolition and excavation waste as aggregates;*
  - ii. *process and re-use the recyclable material on-site, and where this is not possible, the material should be re-used at another site or for land restoration; and*
  - iii. *use substitute or recycled materials in new development in place of primary minerals.*

#### **1.2.2.19. Consistencies between Proposal and Policy DMIN 4**

The proposal is consistent in the following ways:

The construction of the pitches will provide an opportunity for the use of recycled materials in the form of crushed demolition aggregates (for haul roads, compound bases etc)

The sub-base of the new pitches will be derived from subsoils and spoils from local excavations, for example new housing footings, basement digs, highways works, civil engineering projects and underground utility laying.

#### **1.2.2.20. Policy DMCI 2: New Community Infrastructure**

- A. *Proposals for the refurbishment and re-use of existing premises for community facilities will be supported.*
- B. *Proposals for the provision of new community facilities will be supported where they:*
  - i. *are located within the community or catchment that they are intended to serve;*
  - ii. *provide buildings that are inclusive, accessible, flexible and which provide design and space standards that meet the needs of intended occupants;*

- iii. are sited to maximise shared use of the facility, particularly for recreational and community uses; and
- iv. make provision for community access to the facilities provided.

#### **1.2.2.21. Consistencies between Proposal and Policy DMCI 2**

The proposal is consistent in the following ways:

Middlesex Stadium is very much a community recreational facility and therefore any improvement to it can only benefit the local area.

#### **1.2.2.22. Policy DMT 1: Managing Transport Impacts**

A. *Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:*

- i. *be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;*
- ii. *maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;*
- iii. *provide equal access for all people, including inclusive access for disabled people;*
- iv. *adequately address delivery, servicing and drop-off requirements; and*
- v. *have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.*

B. *Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.*

#### **1.2.2.23. Consistencies between Proposal and Policy DMT 1**

The proposal is consistent in the following ways:

The facility is part of an existing football club and close to Ruislip with a bus stop opposite the entrance.

While the site is easily accessible for private cars it is also very accessible for walking and cycling.

The road is a wide B road with long visibility splays and ample “runoff” driveway that leads to the car park. The existing is large and able to accommodate drop off areas and any increased parking requirement.

#### **1.2.2.24. Policy DMT 2: Highways Impact**

*Development proposals must ensure that:*

- i. safe and efficient vehicular access to the highway network is provided to the Council's standards;*
- ii. they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;*
- iii. safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;*
- iv. impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and*
- v. there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.*

#### **1.2.2.25. Consistencies between Proposal and Policy DMT 2**

The proposal is consistent in the following ways:

The traffic statement provided by Cora IHT addresses the matters raised in this policy both during construction and operation.

The is no detrimental impact on Highways as a result of the proposals

#### **1.2.2.26. Policy DMT 5: Pedestrians and Cyclists**

A. *Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including:*

- i. the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;*
- ii. the provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;*
- iii. the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and*
- iv. the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1 or, in agreement with Council.*

#### **1.2.2.27. Consistencies between Proposal and Policy DMT 5**

The proposal is consistent in the following ways:

Pedestrians can easily access Middlesex Stadium via the existing pavements.

#### **1.2.2.28. Policy DMT 6: Vehicle Parking**

A. *Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when:*

- i. the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or*
- ii. a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.*

B. *All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.*

#### **1.2.2.29. Consistencies between Proposal and Policy DMT 6**

The proposal is consistent in the following ways:

Middlesex Stadium has suitable parking provision to accommodate any additional traffic generated by the proposals.

## **2. SUMMARY AND CONCLUSION**

### **2.1. Summary**

This document sets a number of key areas that Middlesex Stadium feel must be addressed to maintain and enhance the facility. As part of a strategy to develop the business in an environmentally responsible manner and make efficient use of land and resources, the proposals have been designed with a strong emphasis on sustainability and self-sufficiency. With regard to National and Local Policy, the proposals set out in this document accord with the relevant policies.

### **2.2. Conclusion**

The design accords with all the relevant NPPF and Local polices having been through a lengthy iterative design process via in depth consultant investigations and appraisals of the site in question.

It is therefore respectfully requested that this proposal should be approved.