

Fuller Long

2nd October 2023

Planning Department
Hillingdon Council

Dear Sir/Madam

Application for Full Planning Consent at Hillingdon Sports and Leisure Complex, Gatting Way, Uxbridge, UB8 1ES

This letter is written in support of a full planning application on behalf of Ameresco. The application seeks consent for the installation of renewable energy technologies at the site, further details of which are set out in the proposals section.

The application site comprises the Hillingdon Sports and Leisure Complex in the London Borough of Hillingdon. The proposals seek to improve the energy performance of the complex to secure its longevity, as well as to assist the Council in meeting its climate change targets.

This letter sets out the proposal, as well as providing an assessment of the scheme against national and local planning policy.

Site and Surrounds

The site forms part of the wider Hillingdon Sports and Leisure Centre. It was originally developed to provide an outdoor lido. Subsequently, between 2000 and 2006 further development took place to provide a modern leisure facility with athletics track, 3G pitches, indoor pools and fitness facilities in addition to the retention of the historic external pool, fountains, grandstand.

The site occupies a raised position above the neighbouring farmland and nature reserve to the east and new housing development to the south.



Image 1. Hillingdon Sports and Leisure Complex

The land is designated as Green belt within the Council's Local Development Plan. In addition, the external pool, fountains, grandstand and entrance building are Grade II listed on the national Heritage List for England.

Fuller Long

An extract from the Council's planning policy map is included below (Image 2).

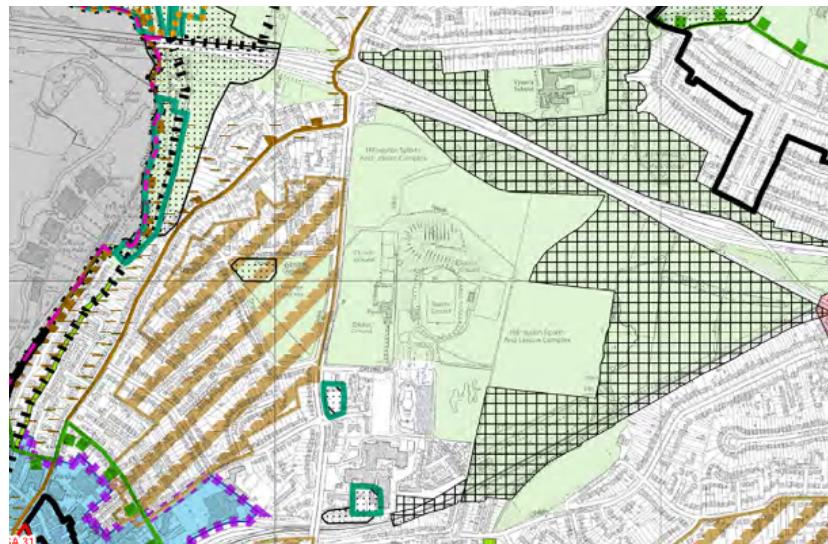


Image 2. Extract from Council's policy map

Proposal

The proposals include the following:

- 5 x ASHP evaporator units on raised frame. Each unit will be 10m (L) x 2.4m (W) x 4m(h)
- 1 x Thermal store 3m diameter x 2.5m (h)
- 1 x ASHP compressor unit (10.0m (l) x 2.5m (w) x 2.7m (h))
- 1 x ASHP unit (1.5m (w) x 5.4m (l) x 2.5m (h)) and thermal store (2.5m (h)) positioned adjacent to the Idris track club building, surrounded by 2.1m grey metal louvre fencing for security.
- 526 PV panels to be fitted to the roof in rows at a 10 degree tilt facing south.
- Associated landscaping and increased height of grassed mound by 1m

No change is proposed to the use of the building, the operating hours, or the access and parking arrangements.

Planning Policy Context

The Development Plan for the London Borough of Hillingdon comprises:

- The London Plan (2021);
- The Hillingdon Local Plan Part 1 - Strategic Policies (2012); and
- The Local Plan Part 2 - Development Management Policies, Site Allocations and Designations (2020).

Other material considerations include:

- National Planning Policy Framework (2021); and
- National Planning Policy Guidance (2021).

The most relevant planning policies are outlined below.

The London Plan

Policy CG3 of the London Plan seeks to create a healthy city, focussing on reducing health inequalities and improving Londoner's health. It states that healthy and active lifestyles should be promoted, alongside ensuring that buildings are appropriately equipped to ensure they are well insulated and sufficiently ventilated.

Policy S5 expands upon this further and aims to protect existing sports and recreation facilities, as well as encouraging the provision of new facilities.

Chapter 9 of the London Plan relates specifically to sustainable infrastructure and reducing emissions and creating sustainable developments.

Local Plan Part 1

Policy EM1 of the Local Plan Part 1 has the aim of reducing climate change. It states that the Council will work with developers to provide efficiency initiatives and it further states that they will promote decentralised energy. The Council also confirms through this policy that they will encourage the installation of renewable energy.

Policy EM2 seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt. Proposals in the Green Belt will be resisted unless (amongst other things) encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area and retain the openness of the Green chain.

Safeguarding and enhancing the network of sport and leisure spaces is the desire of **Policy EM5**. The Council has an overarching aim to promote healthy and active lifestyles in the Borough and protecting existing facilities is key to achieving this aim. This is expanded upon in **Policy CI2** which confirms the importance of leisure and recreation facilities. The policy seeks to secure good quality and well maintained facilities to meet the needs of local communities.

Local Plan Part 2

Policy DMCI 6 further confirms that indoor sports and leisure facilities will be protected and enhanced.

Policy DMEI:4 states that inappropriate development in the Green Belt will not be permitted unless development (amongst other things) are for the purposes of the provision of appropriate facilities for agriculture, forestry, outdoor sport, outdoor recreation and for cemeteries as long it preserves the openness of the Green belt and does not conflict with the purposes of including land within it

Policy DHMB1: Heritage Assets expects development proposals to avoid harm to the historic environment. and **Policy DHMB 2** ensures that works to listed buildings retain their significance and value and are appropriate in terms of fabric, rhetoric integrity, spatial quality and layout. The design of new development is guided by **Policy DMHB 11**. It expects all development, including extensions and alterations to existing buildings, to be of the highest standard and incorporate principles of good design. Good design will take account of the local character and context and use high quality building materials and finishes.

Planning Consideration

An assessment of the proposals against planning policy is provided below.

Principle of Development

The proposals will help to support the running of the existing leisure centre, ensuring it can operate more efficiently and significantly reduce the site's carbon emissions by removing its natural gas users. It will generate electricity on site, upgrade its ageing energy infrastructure, extend the life and optimise operation of existing equipment. It will also improve comfort levels for staff and building users. Leisure centres are notoriously expensive to run owing to the necessity to constantly heat and filter swimming pools, as well as the lighting and cleaning associated with the provision of such facilities with extensive opening hours. Employing the use of photovoltaic panels will allow electricity to be generated which can be used to operate various parts of the facility. Similarly, the air source heat pumps are a far more efficient way of heating and cooling the property, again reducing costs. They will provide space heating and hot water for the facility, as well as provide heating for all swimming pools on site.

Both national and local planning policy places a strong emphasis on promoting and encouraging healthy and active lifestyles. In order to do this, local policy specifically seeks to protect existing leisure facilities through policies EM5, CI2 and DMCI 6. Allowing the proposals within this application will enable the facility to keep operating and will help to safeguard it for the future. This is entirely in line with policy aims and therefore we contend that the principle of development is accepted.

Green Belt

Paragraph 149 of the NPPF allows as an exception to inappropriate development in the Green Belt the provision of appropriate facilities for outdoor recreation subject to the preservation of openness. Whilst the proposals are not for the erection of a new building, in a similar vein given their purpose to support in part an outdoor and recreation use, we consider they are similarly acceptable in Green Belt terms.

In terms of the preservation of openness, the ASHP and cooler units will be located adjacent to a bank, which as part of the landscaping works will be increased in height, and can readily be assimilated within the surroundings such that the openness of the Green belt is not unduly affected. Further the PV panels will be located on the roof and will not increase built form. Consequently it is considered they would not appear prominent or harmful to the openness of the Green Belt.

Notwithstanding the above, we do note that paragraph 151 suggests that elements of many renewable energy projects will comprise inappropriate development and developers will need to demonstrate very special circumstances. Accordingly, these are set out below.

Very special circumstances

Paragraph 98 of the NPPF recognises the importance of access to quality open spaces and opportunities for sport and recreation. Furthermore, paragraph 106 advises planning policies should support an appropriate mix of uses across an area including leisure and educational facilities. As officers are aware, the substantial operating costs of leisure centres is putting a strain on their provision nationwide. The provision of the renewable energy technologies proposed here will assist in securing the future of this important leisure facility in accordance with the recommendations of the NPPF.

In addition to the above, part of Hillingdon's strategic climate action plan is to become carbon neutral by 2030. Accordingly, the Council are proposing a number of energy saving retrofits to their public buildings within the Borough. In accordance with this objective the proposed development will allow the Sports and Leisure Centre to work towards becoming carbon neutral in line with government and local policies.

In our view the above represent very special circumstances which would outweigh any technical harm to the Green Belt caused by reason of inappropriateness.

Design and Heritage

A heritage statement is submitted in support of the application which provides a full assessment on the heritage impact.

In regards to the PV panels, given they will be located on modern roofs and will not be visible from the ground, their impact will be nil upon the significance of the heritage assets.

Fuller Long

The compressor unity and thermal store will be located in an existing service yard to the side of the modern building and below the ground level of the lido. The new unit will be in a discreet, recessed position behind recent structures and there will be no views of it from the main lido area. These additions will therefore have no impact upon the listed building or their setting.

The installation of the ASHPs will be centred on the access road to the south of the site. The access road in this location is naturally at a lower elevation than the lido, sloping west to east with the grassed mound to the south of the lido flanking the road to the north. In order to minimise the visual impact of these units it is proposed to raise the level of the grass mound by 1m, This ground work will enable the units to sit low within the landscape and will preserve the important views looking south from the entrance arch across the lido site. Further tree planting on the grass mound will provide additional screening.

The increased height of green landscaping and associated tree clever will instead provide an improved backdrop to the current outlook across the lido towards the built environment of Uxbridge College, this enhancing the setting of the heritage assets

Sustainability

The key aim of the proposals is to increase the sustainability of the facility by incorporating sustainable energy techniques. Photovoltaic panels and air source heat pumps will reduce the facility's reliance on traditional energy sources, thereby improving its energy efficiency. The proposals therefore meet the requirements of Policy EM1.

Amenity

The photovoltaic panels will not cause any issue in terms of amenity. The air source heat pumps will be located to the front of the property which faces onto the car park. They are positioned to the side of the building which is furthest from residential development. As such, it is not considered that there will be any negative impact on neighbouring amenity as a result of the scheme.

A noise report by AF Acoustics is submitted in support of the application, which conslues that the proposed plant meets the Council's requirements that the plant is 5db below the background noise level at the nearest residential receptors.

Conclusions

The proposals will help to achieve a more energy efficient facility which will consequently help to ensure the sustainability of the leisure centre and its continued operation into the future.

They will not give rise to any negative impact in terms of amenity, and the reduction in car parking spaces is considered to be negligible when compared to the remaining provision and will comply with the relevant Hillingdon planning policies.

Promoting healthy and active lifestyles, and in turn maintaining and enhancing leisure facilities, is a key national and local planning priority and these proposals will help to achieve this aim. It is therefore respectfully requested that planning permission is granted.

We trust you are able to support this application. If however you need any further information please do not hesitate to contact us.

Your sincerely

Clare Preece
Planning Director

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