

## Uxbridge FC

Conversion of the stadia pitch to a 3G Artificial Grass Pitch (AGP) with a 1.1 metre high fence and replacement 158 seater stand to the eastern elevation of the stadia pitch

### Design and Access with Planning Statement

<b>Client</b>	Uxbridge FC		
<b>Project</b>	Conversion of the stadia pitch to a 3G Artificial Grass Pitch (AGP) with 1.1 metre high fence and a replacement 158 seater stand to the eastern elevation of the stadia pitch		
<b>SSL project code</b>	SSL2475A		
<b>Document title</b>	Design and Access with Planning Statement		
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SSL project code	SSL2475A	1
Client	Uxbridge FC	
Document Title	Design and Access with Planning Statement	

## Contents

Section	Title	Page No
1	Introduction	3
2	Design and Access Statement Principles	4
3	Design and Access Statement	5
4	Planning Statement	9
5	Air Quality Assessment	20
6	Existing site photos	22
7	Conclusions	24

## Associated Documents

SSL2475 01 – Topographical Survey  
 SSL2475 02 – Site Location Plan  
 SSL2475 03 – Proposed Site Plan  
 SSL2475 04 – Proposed Site Plan with Satellite Map  
 SSL2475 05 – Proposed ATP Plan  
 SSL2475 06 – Fencing Elevation  
 SSL2475 07 – Stand Elevation  
 SSL2475 08 – Proposed AGP Drainage Layout  
 SSL2475 09 – Proposed AGP Drainage Strategy

Appendix A - Proposed AGP Materials and Appearance  
 Appendix B - AGP Drainage Strategy  
 Appendix C - Local Ground Conditions

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SSL project code	SSL2475A	2
Client	Uxbridge FC	
Document Title	Design and Access with Planning Statement	

## 1. Introduction

1.1 Surfacing Standards Limited has been appointed to consider and develop an application for full planning permission for the conversion of the stadia pitch to a 3G Artificial Grass Pitch (AGP) with 1.1 metre high fence and a replacement 158 seater stand to the eastern elevation of the stadia pitch at:

**Uxbridge FC**

Honeycroft  
Horton Road  
West Drayton  
Middlesex  
UB7 8HX

1.2 In order to assist the application for full planning permission and to facilitate the implementation and delivery of the project this document describes the project aspirations and illustrates the process that has led to the development proposal, and to explain and justify the proposal in a structured way.

1.3 This statement discusses design and access issues regarding the use, amount, layout, scale, landscaping, appearance and context of the scheme. In addition, the wider access implications of the proposal are addressed.

1.4 A planning statement is also provided to adequately address development plan policies and material considerations associated with this proposal.

1.5 The applicant is:

**Uxbridge FC**

Honeycroft  
Horton Road  
West Drayton  
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SSL project code	SSL2475A	3
Client	Uxbridge FC	
Document Title	Design and Access with Planning Statement	

## 2. Design and Access Statement Principles

2.1. Guidance on information requirements and validation, published Town and Country Planning (Development Management Procedure) (England) Order 2015 recommends that a design and access statement is a short report accompanying and supporting a planning application to illustrate the process that has led to the development proposal, and to explain the proposal in a structured way. The level of detail required in a design and access statement depends on the scale and complexity of the application, and the length of the statement varies accordingly. Statements must be proportionate to the complexity of the application, but need not be long. Further published recommendations are:

- Design and access statements help to ensure that development proposals are based on a thoughtful design process and a sustainable approach to access.
- Statements should improve the quality of proposals: in preparing the design and access statement, developers need to consider and subsequently explain the merit of the design and how it relates to the existing setting.
- Design and access statements enable local planning authorities to better understand the analysis which has underpinned the design and how it has led to the development of the scheme. This helps negotiations and decision-making and should lead to an improvement in the quality, sustainability and inclusiveness of the development.
- Design and access statements allow local communities, access groups, amenity groups and other stakeholders to involve themselves more directly in the planning process without needing to interpret plans that can be technical and confusing. This helps to increase certainty for people affected by development and improve trust between communities, developers and planners. It also enables the design rationale for the proposal to be more transparent to stakeholders and the Local planning authority.

### 2.2 What Is Required: The Design Component

The design and access statement should cover both the design principles and concepts that have been applied to the proposed development and how issues relating to access to the development have been dealt with. Statements should evolve throughout the design and development process.

A design and access statement for a planning application should explain the design principles and concepts that have been applied to particular aspects of the proposal. These are:

- Scale: Scale is the height, width and length of a building or buildings in relation to its surroundings.
- Amount: The amount of development is how much development is proposed. For residential development, this means the number of proposed units for residential use and for all other development, this means the proposed floor space for each proposed use.
- Layout: The layout is the way in which buildings, routes and open spaces (both private and public) are provided, placed and orientated in relation to each other and buildings and spaces surrounding the development.
- Landscaping: Landscaping is the treatment of private and public spaces to enhance or protect the amenities of the site and the area in which it is situated through hard and soft landscaping measures. Statements should also explain the function of the landscaping, for instance for sustainable drainage purposes, providing shading or other climate change adaptation purposes, and explain how it will be maintained.
- Appearance: Appearance is the aspect of a place or building that determines the visual impression it makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture.

### 2.3 What Is Required: The Access Component

It is important to note that the requirement for the access component of the statement relates only to 'access to the development' and therefore does not extend to internal aspects of individual buildings. Statements should explain how access arrangements will ensure that all users will have equal and convenient access to buildings and spaces and the public transport network. The statement should address the need for flexibility of the development and how it may adapt to changing needs.

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SSL project code	SSL2475A	4
Client	Uxbridge FC	
Document Title	Design and Access with Planning Statement	

### 3 Design and Access Statement

3.1 Having followed planning policy recommendations and published technical guidance, we consider the proposal is based upon best design practices for the conversion of the stadia pitch to a 3G Artificial Grass Pitch (AGP) with 1.1 metre high fence and a replacement 158 seater stand to the eastern elevation of the stadia pitch.

#### 3.2 Proposal Description

Planning permission is sought to create a new external sports pitch development with associated features including:

- Existing Stadium Pitch converted to artificial 3G Grass pitch sized 100m x 69m.
- Pitch perimeter barrier fence 1.1 metre high
- Replacement 158 seater stand to the eastern elevation of the main stadia pitch

#### 3.3 Site Description

Uxbridge FC, Honeycroft, Horton Road, West Drayton, Middlesex, UB7 8HX



The site is located in the West Drayton area of suburban west London and is occupied by Uxbridge Football Club. The site comprises two grassed football pitches, a clubhouse, car parking and stands. The site is accessed off Horton Road which contains a mix of industrial and commercial uses to the south of the site. Stockley Park public recreation ground is to the west, Stockley Country Park is to the North and Stockley Park Golf Course is to the East. The site was quarried for sand and gravel between c1914 and c1938.

The topography local to the site is relatively level with a gently slope downwards to the south with the site some 3m above the land to the west and 2m above the adjoining site to the south.

Centrally the grass surfaced first team pitch and run off area are surrounded by a concrete post and timber fence (1m in height) and concrete footpath around the perimeter of the pitch. Four stands and dug out are also located around the perimeter of the pitch. The stands are concrete with corrugated metal roofing. Lighting columns are also present around the perimeter of the pitch. Levels across the existing grass surfaced pitch undulate noticeably.

The eastern portion of the site is occupied by the training pitch which is a grass surfaced pitch with no physical border defined except on the southern boundary which is marked with Heras type fencing.

The western area of the site is a series of small grassed areas with concrete footpaths that front the changing rooms and bar. Fencing up to 1.5m to 2m in height separates the larger area into three smaller areas with gates present to allow access.

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SSL project code	SSL2475A	5
Client	Uxbridge FC	
Document Title	Design and Access with Planning Statement	

Just beyond the northern and eastern boundaries are areas of trees, shrubbery and heavy undergrowth. The trees are a mixture of multiple species and mixed maturity the largest being some 12m in height. To the south is an area of bituminous bound surfacing used as car parking with an industrial estate beyond.

The grassed area fronting the changing rooms and bar provide access to a third area that is grass surfaced on the northwest corner of site which is utilised as a parking area on match days.

### 3.4 Site History

An attempt to trace the history of the site has been carried out by reviewing copies of old Ordnance Survey maps provided by Envirocheck. The recent history of the site based on published Ordnance Survey maps is summarised in the following table:

Summary description of site history from Ordnance Survey maps		
Date	Onsite	Offsite
1878	The site is an undeveloped parcel of land with a field boundary along the eastern boundary.	The site is surrounded by undeveloped land.
1895	As above.	A gravel pit is located 50m to the south of the site with several railway sidings within the gravel pit and one traveling from the gravel pit up along the western boundary of the site. The siding is some 10m from the site with several small unidentified buildings located some 20m from the western boundary of site. The area to the west of site is labelled as brick fields.
1914	The gravel pit to the south has extended northwards and now encroaches onto the southern area of the site. A railway siding is also now located on the southern part of the site, entering the site roughly half way across the southern boundary.	The railway sidings within the quarry have been moved.
1932	As above.	As above.
1935	The gravel pit is seen to extend further onto site covering the central and northeast corner of the site with several small structures now located on the southwest corner of the site. The railway siding on the southern area of site have been removed.	The area to the south is still recorded as an active gravel pit. An area of residential housing has been developed some 195m to the west and a series of allotment gardens is visible 120m north. The immediate surrounding land to the west, north and east appears to remain undeveloped.
1938	As above	As above
1965	The site is now shown as a sports ground. A pavilion is located on the southwest corner and extending beyond and a tennis courts is present on the northwest corner. A slope is recorded along the western boundary.	Several works structures are located some 40m to the south with a depot 110m south within the area of the former gravel pit. A body of water is shown to the immediate north of the site along with several other bodies of water 40m northeast and 80m east of the site. A new industrial estate, the closest being 110m southwest with several building labelled.
1975	As above.	The bodies of water to the north and northeast are no longer shown. One body of water still remains to the east. Several additional industrial units are located within the industrial estate to the southwest. The works units include a plastic factory, several engineering works, warehouses, unspecified works, and a tyre depot.
1992	The site is now listed as a football ground and the pavilion on the southwest corner has been extended just beyond the southern boundary of the site.	A new car parking area is located just beyond the southern boundary of the site adjacent to the newly extended pavilion.
1993	A defined football pitch is now shown on site with two stands and boundaries inferred likely to be the fencing observed on site. An additional structure has been developed on site on the southwest corner just north of the pavilion, likely to be the structure observed on site housing the changing rooms.	The area to the east of site is labelled as a golf course with an area named as Stockley Park to the north. A pond is also located 10m north of the site as part of Stockley Park.
1999	Two additional stands have been added on the northern and southern ends of the football pitch.	No significant change.

In addition to the above site history, the site has the following planning history:

#### Planning History

Ref: 3731E/84/1451

Retention for the covered stand on the east side of the ground

Decision: Approval

Date of decision: 7<sup>th</sup> February 1986

Ref: 3731J/95/1037

Erection of the two covered standing areas behind the goals

Decision: Approval

Date of decision: 26<sup>th</sup> October 1995

Ref: 3731L/98/2495

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SSL project code	SSL2475A		6
Client	Uxbridge FC		
Document Title	Design and Access with Planning Statement		

Erection of single storey extensions to existing member's bar and adjacent function room, toilet extension and enlargement of car park  
Decision: Approval  
Date of decision: 25<sup>th</sup> August 1999

### 3.5 Purpose and Use

The conversion of the stadium natural turf pitch will enable a better-quality playing surface for the first team and users with no games being called off due to adverse weather conditions. The nature of the ground conditions of the old quarry creates issues with the ongoing condition of the playing surface, inconsistent grass growth and movement of the playing surface that will be eradicated from the proposed re-engineering works of the base to serve the 3G pitch surface and significantly improve sporting play and characteristics of the Uxbridge FC teams.

The development will dramatically benefit the club, partner organisations and sports clubs in the surrounding area, via pre-arranged and structured access.

The stadium pitch will be marked out just for 11 a side football and used for competitive matches only.

The AGP will be capable of supporting the following formal pitch arrangements:

Size and Age grouping	Quantity
Main Stadia pitch size 100m x 69m (Over 18/ Adult Football) in white	1

### 3.6 Amount

The proposed development has been prepared in accordance with published Design Guidance Notes (The Football Association (FA) / Sport England) pertinent to external artificial sports facility provision. The proposed amount of development is:

Aspect	Area
3G artificial grass pitch area 106m x 75m inc run offs	7,950m <sup>2</sup>
Replacement eastern stand	68.7m <sup>2</sup>
<b>Total Development Area</b>	<b>8,018.7m<sup>2</sup></b>

### 3.7 Layout

Key considerations of the proposal included:

- Avoidance of unacceptable impact to residential neighbours through mitigation of any noise and lighting impact
- Convenient proximity to changing facilities/welfare
- Convenient proximity to management and supervision offices
- Convenient proximity to vehicular parking areas
- Ensuring the justification for the loss of any natural turf playing field areas

### 3.8 Scale

The proposed height of new perimeter fencing will be 1.1 metres.

The scale of the replacement stand will be single tier measuring 4.4 metres to the highest point.

### 3.9 Landscaping

Soft landscaping on the site is currently dominated by the grassed pitches with small amount of tree planting in the southern part of the site within the car park and a small line of trees in the north of the site. The proposed layout seeks to retain all of the existing landscaping.

### 3.10 Appearance

The intention is to develop the proposal with minimal visual impact when viewed looking into the site, which is necessary to satisfy local policies which seek to ensure that proposals are sympathetic to its surroundings and will not impact on the visual amenity of the area and the amenity of neighbouring residents.

To understand the materials and image of the components please refer to Appendix D: Proposed AGP Materials and Appearance.

The proposed finished appearance of the principal pitch features is as follows:

#### 3.10.1 3G Artificial Grass Playing Surface

The installed appearance of the playing surface will comprise a 3G artificial turf partially in-filled with silica sand (for stability) and granulate rubber (for performance), coloured grass green.

This is consistent with current Football Association (FA) technical requirements to deliver adequate performance characteristics for the intended sporting activities.

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SSL project code	SSL2475A	7
Client	Uxbridge FC	
Document Title	Design and Access with Planning Statement	

This surface type is recognised as the most suitable artificial playing surface for community football and youth football development.

This surface type is credited as 'preferred football surface' and 'surface for high level competition / training' within Sport England's guidance document 'Selecting the Right Artificial Surface for Hockey, Football, Rugby League and Rugby Union' Issue 002 / December 2010.

### 3.10.2 Perimeter Ball Stop Fencing

The proposed type and quality of ball-stop fencing is consistent with current Football Association (FA) technical requirements for fencing to enclose artificial grass sports pitches.

The installed appearance of the pitch perimeter barrier (1.1m high) will be polyester powder coated RAL6005 Moss Green, all supported with an intermediate post system and entrance gates of matching colour. The fencing type will be steel open mesh fencing.

### 3.11 Access/ Transport Links

Paragraph 111 of the National Planning Policy Framework (2021) sets out that 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.

This development should not be prejudicial to the satisfactory functioning of the highway and that additional traffic movements generated by the proposal should not result in unacceptable impacts on the highway network.

The construction access is through an already present access from Horton Road with a passage to the site that contains existing passing bays.

The use of the site will remain as existing with the pitches being used for the same purposes and numbers of groups/users as existing. The frequency of use would increase due to the enhanced durability of the 3G artificial grass playing surface, especially during winter weather conditions. The pitches are used all year round at the weekday evenings and weekends due to the existing lighting onsite.

The application requests opening hours for the new facility from 1000 to 2230hrs Monday to Sunday.

The convenient location of the site will ensure the proposed 3G facility can easily be accessed and utilised by nearby communities with Horton Road being located on a public transport route. In addition, West Drayton train station is only just over 1km away from the site.

Whilst the proposal involves a new stand, this is a replacement stand, so the proposal is not expected to result in an intensification of the site in terms of numbers attending the site at peak times.

The site already has a significant amount of existing parking as set out below:

Type of Vehicle	Existing No. of Spaces
Car	131
Light Goods Vehicles/Public Carrier	1
Motorcycles	20
Disability Spaces	4
Cycle Spaces	0
Electric charging	0
Other (e.g. Bus)	2

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SSL project code	SSL2475A		8
Client	Uxbridge FC		
Document Title	Design and Access with Planning Statement		

## 4. Planning Statement

### 4.1 National Planning Policy

We understand that development management decisions must be taken in accordance with the National Planning Policy Framework (NPPF) as updated in July 2021.

### 4.2 Local Planning Policy

We understand that development management decisions must be taken in accordance with the current Local Plan. The London Borough of Hillingdon Local Plan –Vision for 2026 part 1 was adopted in 2021 with part 2 adopted in 2020. It sets out the Council's policies for the use and development of land across the whole of the Borough. The Local Plan sets out the strategy, policies and proposals by which planning applications for development will be assessed. The relevant local planning policies associated with this development are set out in section 4.10.

### 4.3 Material Planning Considerations

We acknowledge there are material planning considerations relevant to the proposal including:

- Compliance with relevant planning policy guidance, local development plans and policies
- Principal of development to enable Sport England's informed assessment of whether the proposed benefits to sport associated with development would be sufficient to outweigh the detriment associated with the impact on the playing field and satisfy exception policy 5 of Sport England's Playing Fields Policy and Guidance 2018.
- Design and impact upon the character and appearance of the surrounding area
- Adequate impact mitigation to residential neighbour's (protecting visual amenity and residential amenity)
- Artificial Grass Pitch (AGP) rationale and sport related benefits
- AGP management and maintenance
- Suitable parking provision to serve the site

### 4.4 National Planning Policy Framework (July 2021)

#### Section 2 - Achieving Sustainable Development

Policy extract:

*Paragraph 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 contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

The National Planning Policy Framework introduced a presumption in favour of sustainable development, and this can be set out as three dimensions – Economic Role, Social Role and Environmental Role.

This proposal aims to contribute to the above areas in the following ways:

- Economic Role – providing a self-funding facility for use by Uxbridge FC and community users.
- Social Role – providing modern facilities that will encourage the maximum football developmental outcomes with the benefits to health and wellbeing associated with this.
- Environmental Role – ensuring that the existing natural environment is not harmed and that facilities are designed to conserve and reduce energy wastage wherever possible.

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;

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SSL project code	SSL2475A	9
Client	Uxbridge FC	
Document Title	Design and Access with Planning Statement	

- 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 The Football Association's 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 committee will review a variety of objectives and controls to correctly manage, adequately operate and maintain the facility;
- Ensure the AGP, once subjected to performance testing to validate necessary quality standards, is added to the FA register of approved sites for match play.

#### 4.4.1 Maintenance/ Management Considerations and Sustainability

The facility will be operated and managed by Uxbridge FC.

The opening and closing of the facility will be managed by the site. The access to the 3G pitch will be monitored by the site. The site has a significant amount of parking and the location of the proposed development means the parking facilities are within easy access.

The general maintenance of the facility will be carried out by the site team along with the addition of specialist maintenance throughout the year.

The requisite pitch booking systems and processes will be developed.

A sinking fund will be established to cover the costs of long-term facility maintenance and refurbishment such as replacement of the artificial turf surface.

Uxbridge FC will implement a community use management plan to ensure the facility is correctly operated.

This plan will provide a management structure for the facility is outlined below:

- Overall responsibilities
- Direct reporting systems
- Day to day management
- Training, staffing and staff development
- Maintenance and security
- Community use of facilities
- Community booking procedures
- Community operational procedures
- Local resident communication
- Onsite car parking for community users

#### 4.4.2 Energy and Waste Reduction

The development will require a construction operation to be carried out which will involve importation of materials. However, a variety of efficiencies will be applied to the construction stage 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:

- Following removal of overgrown vegetation, excavations for the 3G pitch footprint will be limited to the removal of the top layer of the old pitch only.
- Imported granular sub-base aggregates to form the pitch foundations shall be locally sourced from local quarries or suppliers to reduce transportation
- The implementation of the development does not require water supplies.
- For the artificial grass playing surface, modern textile manufacturing methods and technology continue to advance. As such, it is common place for artificial grass surfaces to be recycled at the end of their life cycle and be re-made into new similar surfaces or other products. It can be expected that technologies will enable this environmental sustainability form of recycling to be common place in the future, to the benefit of this proposal when refurbishment is due after an initial life cycle.

In conclusion the proposed new Artificial Grass Pitch (AGP) will replace a facility that will:

- Provide access to better quality provision
- Provide access to a greater quantity of provision
- Be located in a suitable accessible location
- Be supported by effective and appropriate management arrangements

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SSL project code	SSL2475A		10
Client	Uxbridge FC		
Document Title	Design and Access with Planning Statement		

- Be implemented with best practice construction techniques in order to minimise waste and pollution

4.5 National Planning Policy Framework (July 2021)  
Section 8 – Promoting Healthy and Safe Communities

Policy extract:

*Paragraph 98: 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. 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.*

*Paragraph 99: Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

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

The planning system encourages and promotes the retention of existing and the provision of additional, outdoor sports facilities, both public and private.

Whilst it is acknowledged the proposed development would result in the loss of part of a grassed playing field, it must be noted that the scheme would provide a purpose-built facility that would facilitate a far greater level of use for sport and recreation throughout the whole year.

In addition, when assessing the proposal, consideration must be given to the importance of the standard of design and compatibility of a scheme to harmonise with the general character of the area in which they are set, the impact upon the private amenity of the neighbouring occupiers and highway safety, amongst other material considerations.

The proposed development will implement better provision in terms of quality and quantity and in a suitable location to benefit the community and provide access and opportunities for sport and recreation, making an important contribution to the health and well-being of the local community.

The proposed location is as per existing pitches and will continue convenient pedestrian and maintenance access as well as providing for suitable management, supervision and security by the site staff.

The close proximity of existing facilities described above will help to create a healthy and safe place of exercise.

This proposal satisfies the above planning objectives and is beneficial to the advancement of sports activity and development.

It will deliver genuine beneficial outcomes as follows:

- Implement social, recreational and cultural facilities and services for community needs to enhance the sustainability of the site and the area.
- Provide access to a high-quality open space and provide opportunities for sport and recreation that can make an important contribution to the health and wellbeing of the local community.
- Make beneficial usage of the site resulting with better provision provided by a durable Artificial Grass Pitch (AGP).
- The proposed development will provide a clean, safe and modern facility to inspire sporting participation and will enhance the existing sport and recreation provision at Uxbridge FC.
- It will provide a genuine asset for the applicant and local community sporting groups and organisations.
- It will encourage and inspire more people of all ages to participate in sport.

For these reasons, we believe the following objectives have been satisfied:

- Promotion of social inclusion and community cohesion.
- Health and wellbeing.
- Promoting more sustainable development.

4.6 National Planning Policy Framework (July 2021)  
Section 12 – Achieving well designed places

Policy extract:

*Paragraph 126: The creation of high quality 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*

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SSL project code	SSL2475A	
Client	Uxbridge FC	

Document Title

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.

*Paragraph 134: In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.*

#### Design Standards

In terms of design standards, the schedule of works necessary to implement the proposal are designed in accordance with, and must be constructed if full compliance with the following sources of technical guidance and performance quality standards which are appropriate to external artificial sports facilities:

##### Artificial Grass Pitch (AGP)

- The Football Association (FA) Guide to 3G Football Turf Pitch Design Principles and Layouts.
- Federation Internationale de Football Association (FIFA) Quality Concept for Football Turf – Handbook of Requirements (October 2015).
- Sport England Design Guidance Note 'Artificial Surfaces for Outdoor Sport – updated guidance for 2012.
- Sport England's guidance document 'Selecting the Right Artificial Surface for Hockey, Football, Rugby League and Rugby Union' Issue 002 / December 2010.

#### Goals

- BS 8462:2005+A2:2012 Goals for youth football, futsal, mini-soccer and small-sided football.
- BS 8461:2005+A1:2009 Football goals. Code of practice for their procurement, installation, maintenance, storage and inspection.
- BS EN 748:2004 Playing field equipment. Football goals. Functional and safety requirements, test methods.

#### Ball Stop Fencing

- BS EN 15312:2007 A1:2 Free access multi-sports equipment – Requirements, including:
- Clause 5.5.1.2.1 Resistance to repeated impact of footballs
- Clause 5.5.1.2.2 Very intense forceful impact resistance to player's kicks

#### Generally

- Works must comply with current Building Regulations and British / European Standards applicable to the proposal

#### Design and Impact upon the Character and Appearance of the Surrounding Area

The proposed Artificial Grass Pitch (AGP) surface will comprise artificial grass partially in-filled with silica sand and granulate coloured green.

Surrounding the perimeter of the AGP would be a ball stop fencing with open steel mesh polyester powder coated green

Perimeter fencing would be low level, replacing existing low level perimeter fencing.

The design of the stand is a standard, modern design, common in many non league football grounds and will be an improvement on the existing stand which is falling into disrepair. The scale and size will not over dominate the existing site.

It is not considered that the AGP or associated elements would be detrimental to, or out of keeping with, the character of the site setting.

The Artificial Grass Pitch (AGP) design is in accordance with appropriate technical recommendations published in The FA Guide to 3G Football Turf Pitch Design Principles and Layouts.

#### Visual Amenity – 3G Artificial Grass Playing Surface

The new Artificial Grass Pitch (AGP) will be surfaced with 3G artificial grass coloured grass green. The visual appearance will be similar to existing fine sports turf and in keeping with a playing field environment. 3G synthetic turf is designed to look like natural turf, unlike the older type sand filled 'astroturf' type surfaces.

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SSL project code	SSL2475A		12
Client	Uxbridge FC		
Document Title	Design and Access with Planning Statement		



Example of artificial surface



In order to preserve unbiased ball roll characteristics, the new facility would be constructed with a maximum 1:100 (1%) slope but due to efficient drainage systems the levels will be constructed to 1 in 300. To the naked eye this will appear flat and given the existing site is reasonably level, there would not need to be any significant site levelling operation.

The minor cut and fill operation to provide the plateau on which the facility would be constructed would be a balanced operation utilizing site won material. This reduces the need to import any 'fill' material to site, thereby providing a more environmentally friendly design solution which will reduce construction programme and reduce construction traffic movements.

#### Visual Amenity – Ball Stop Fencing

The proposals incorporate perimeter fencing, which will consist of a weld mesh design comprising see-through mesh, coloured RAL 6005 moss green. This type is commonly installed around artificial sports pitches and would not give rise to unacceptable visual impacts to warrant refusal of the application.

Darker colours of fence finish, in particular black and dark green, are the most discrete colour options against the backdrop, which has been a factor in this proposal.



Example of perimeter fencing

#### Visual Amenity – replacement stand

The replacement stand will be a standard modern design along the eastern elevation of the pitch.

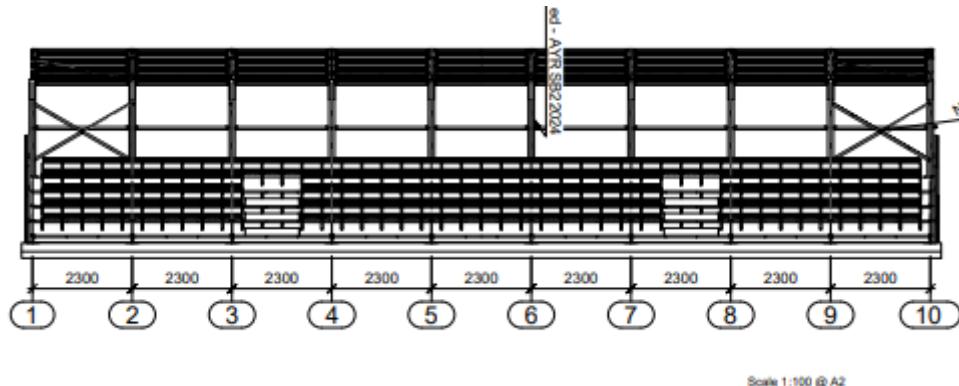
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SSL project code	SSL2475A		13
Client	Uxbridge FC		
Document Title	Design and Access with Planning Statement		



4.7 National Planning Policy Framework (July 2021)  
Section 13 – Protecting Green Belt land

*Policy extract:*

Paragraph 148: 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.

Paragraph 149: A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

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

In term of the impact on the Green Belt the proposal will provide improved, replacement facilities for outdoor sport and recreation on an existing outdoor sports facility, therefore conforming in principle to paragraph 149 of the NPPF 2021. The proposal will not result in the unrestricted sprawl of the built-up area, it will not prevent neighbouring towns merging into one another and it will safeguard the countryside from encroachment. This is in line with the purposes of preserving the Green Belt.

4.8 National Planning Policy Framework (July 2021)  
Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

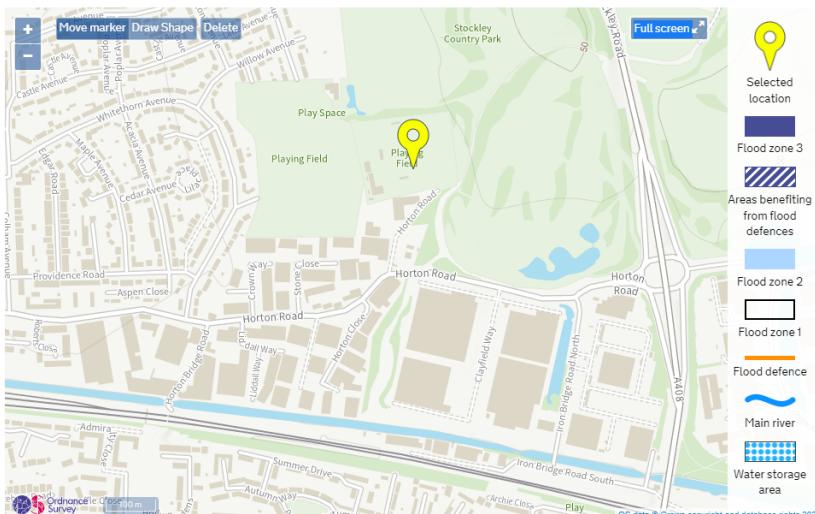
*Policy extract:*

Paragraph 167: 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.

Paragraph 168: 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 as set out in footnote 55.

55. Site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.



The government's flood risk for planning map shows the site is located within flood zone 1, indicating a low risk of flooding.

Department for Environment, Food and Rural Affairs Sustainable Drainage Systems Non-statutory technical standards for sustainable drainage systems March 2015

*The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and unless otherwise agreed in writing by the Local Planning Authority, no surface water shall discharge to the public sewerage system either directly or indirectly.*

**For further information please see the appended Drainage Strategy.**

**4.9 National Planning Policy Framework (July 2021)**  
**Section 15 – Conserving and Enhancing the Natural Environment**

*Policy extract:*

*Paragraph 185: 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;*
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

**Noise Impact**

It is acknowledged that the application proposal would result in extended times of use of this area of the site, particularly during winter months, which is resultant from an intensification of use made possible by the durability of a 3G artificial grass playing surface and the existing floodlight system.

The proposed hours of operation for the new Artificial Grass Pitch (AGP) are as follows:

Monday to Sunday 1000 hours to 2230 hours

The nearest residential properties to the proposed junior and training Artificial Grass Pitch (AGP) are approximately 170m to the north west and 260m away to the west. Due to these large separation distances, and the fact the site is an existing floodlit football pitch, there will be a minimal adverse impact to residents with regards to noise disturbance.

The proposal requests usage of the Artificial Grass Pitch (AGP) up to 22:30 hours throughout the week (Monday to Sunday).

It is important to understand that the proposed hours of use have been carefully considered to implement a sustainable facility that allows covering of ongoing maintenance and upkeep costs along with a sinking fund in place to replace the surface and other necessary components and to allow the site and its partner organisations and community groups to adequately satisfy the demand for football development via pre-arranged and structured community access.

Limitation of the lighting impact will be controlled by the strict management of permitted operating times. An intelligent control system shall be in place that allows pre programmable switching of the lights for each allocated time slot to ensure lights are extinguished at the curfew hour every night of use.

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SSL project code	SSL2475A
Client	Uxbridge FC
Document Title	Design and Access with Planning Statement

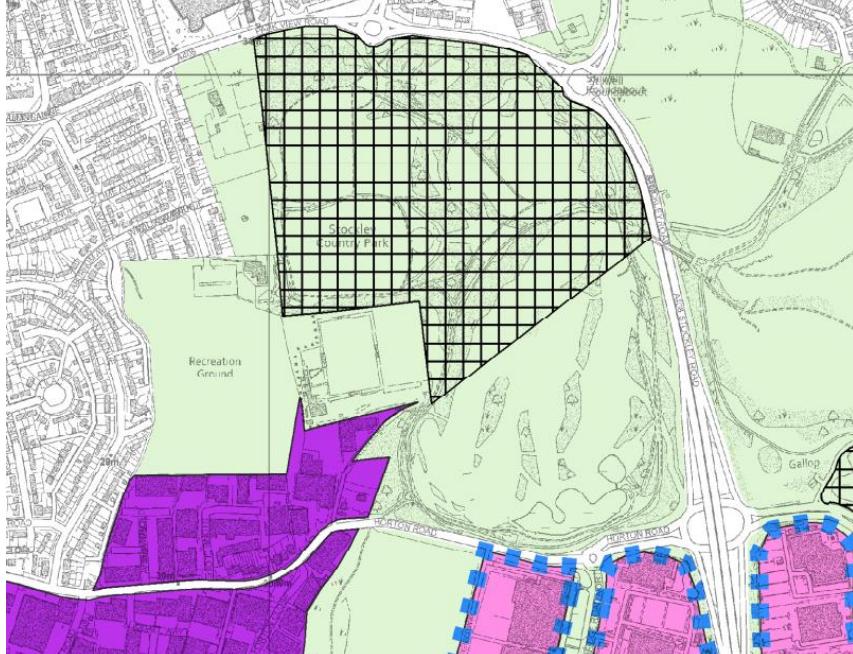
The intelligent control system will be set to operate within a pre-programmed time including a seasonal changeover facility for BST and GMT.

Usage of the floodlighting system will be solely within permitted times and these hours shall be controlled by a photocell detector and timer switch to ensure that any lighting does not adversely impact neighbouring residential amenity.

#### 4.9 Local Planning Policy: London Borough of Hillingdon

We understand that development management decisions must be taken in accordance with the Local Plan. The Local Plan is the foundation for how planning will be controlled in Hillingdon. The Local Plan Part 1 sets out the overall level and broad locations of growth up to 2026. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2, which comprises Development Management Policies, Site Allocations and Designations and the Policies Map. It will deliver the detail of the strategic policies set out in the Local Plan Part 1.

After review of the local plan policies map for Hillingdon the site is identified as being within the Green Belt:



There is no neighbourhood development plan covering the area of the application site.

We feel that the proposed development demonstrates clear coherence with various local planning policies including:

#### **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:

1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;
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;

#### **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.

Minor adjustments to Green Belt and Metropolitan Open Land will be undertaken in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD.

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.

Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; 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.

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SSL project code	SSL2475A		16
Client	Uxbridge FC		
Document Title	Design and Access with Planning Statement		

#### 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.

#### 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:

- i) the height and bulk of the existing building on the site;
- ii) the proportion of the site that is already developed;
- iii) the footprint, distribution and character of the existing buildings on the site;
- iv) the relationship of the proposal with any development on the site that is to be retained; and
- v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

#### 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.

#### 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.

#### 4.10 Sport England – Planning for sport guidance

Sport England will be a statutory consultee on this planning application.

The following details are provided to enable Sport England's informed assessment of whether the proposed benefits to sport associated with development would be sufficient to outweigh the detriment associated with the impact on the playing field and satisfy exception policy 5 of Sport England's Playing Fields Policy and Guidance 2018.

This policy statement defines in planning terms what is considered a 'playing field', which is; the whole of a site that encompasses at least one playing pitch. A playing pitch is a delineated area, which together with any run off is of 0.2 hectares or more.

Playing pitches may have a grass surface or an artificial one.

The aim of the policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demands of the pitch sports.

The following details are provided to enable an assessment:

Requirement	Detail provided
Impact the proposed development would have on playing pitch provision including proposed summer / winter playing pitches	The application site is presently a stadium pitch and this proposal seeks to convert to an artificial sports pitch surface. The development would result in greater use and improvement of provision on the site.  Uxbridge FC is of particular importance to the development of sport in the local area.

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SSL project code	SSL2475A	
Client	Uxbridge FC	
Document Title	Design and Access with Planning Statement	

Existing community use of the site	The current site is used for sporting purposes by the community and already has an operating and management system in place. This will be extended for the required increased hours of use for the AGP.
Community use of the proposed sports facility	<p>The resultant facility would not only be used by community football clubs, but also by partner organisations and community groups from the surrounding areas to gain the maximum football developmental outcomes, via pre-arranged and structured community access.</p> <p><u>Community Use Management Plan</u></p> <p>The site will implement a community use management plan to ensure the facility is correctly operated.</p> <p>This plan will provide a management structure for the facility is outlined below:</p> <ul style="list-style-type: none"> <li>• Overall responsibilities</li> <li>• Direct reporting systems</li> <li>• Day to day management</li> <li>• Training, staffing and staff development</li> <li>• Maintenance and security</li> <li>• Community use of facilities</li> <li>• Community booking procedures</li> <li>• Community operational procedures</li> <li>• Local resident communication</li> <li>• Onsite car parking for community users</li> </ul>
Community access formally secured through a community use agreement	<p>A Community Use Agreement with key partners will be established and managed on a formal basis. It is envisaged that the requirement for this community use agreement would be inserted as a planning condition and such an agreement would be informed by the Sport England template.</p> <p>The provision of the new external Artificial Grass Pitch (AGP) will provide increased usage in comparison to the existing site during the daytime and evenings.</p> <p>This extended use is possible because the proposed new Artificial Grass Pitch (AGP) is resilient during winter weather conditions.</p>
Sport related benefits of the proposed artificial grass pitch for the applicant and the community	<p>The proposed new AGP would make a significant contribution towards addressing the unmet demand for modern football facilities in the local area.</p> <p>The proposed new AGP will accord with Sport England's and The Football Association's technical design guidance for Artificial Grass Pitches (AGPs).</p> <p>The Artificial Grass Pitch (AGP) could be used continuously throughout the year and intensively due to its artificial grass surface and existing floodlighting.</p> <p>This project will support Sport England's key goals in the following ways:</p> <ul style="list-style-type: none"> <li>▪ Increasing the number of people playing sport for at least 30 minutes once a week</li> <li>▪ Developing new teams and participation opportunities</li> <li>▪ Recruiting new players to all football formats</li> <li>▪ Providing quality training and match play facilities</li> <li>▪ Achieving growth in adult participation</li> </ul> <p>Providing juniors supported pathways into adult teams</p> <ul style="list-style-type: none"> <li>▪ Providing adult teams with affordable facilities</li> <li>▪ Raising the percentage of young adults who play sport once a week</li> <li>▪ Developing secure pathways into adult football</li> <li>▪ Creating pathways from recreational football into clubs</li> </ul>
Explanation of which sports the new artificial turf pitch will accommodate	<p>With football being the targeted sport, the appropriate surface choice is 3G artificial grass (this being regarded by The Football Association as the most suitable artificial playing surface for community football and youth development).</p> <p>Sport England guidance** describes this as a 'preferred football surface' and capable of high level competition / training (national/international).</p>

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SSL project code	SSL2475A	
Client	Uxbridge FC	
Document Title	Design and Access with Planning Statement	

	<p>**Sport England's guidance document 'Selecting the Right Artificial Surface for Hockey, Football, Rugby League and Rugby Union' Issue 002 / December 2010.</p>
Proposed surface type	3G artificial turf
Maintenance & Sustainability	<p>Arrangements to ensure the long-term maintenance of the 3G pitch will be established, along with a necessary sinking fund to ensure the long term benefit of the facility.</p> <p><u>Operation and Management Arrangements</u></p> <p>Uxbridge FC have the infrastructure already in place to manage and operate the facilities. They have a team of premises and site staff that facilitate the community use of the facilities. The 3G pitch will be a natural extension to this provision and plans are in place to review the current staffing structure to ensure that there is the capacity to cover the increased responsibility.</p> <p>Staff will be on hand to open and close the facility and the pitch will be located on the grounds of the site.</p> <p>There is ample parking on site.</p> <p>Maintenance</p> <p>Uxbridge FC have a team of onsite grounds staff who have responsibility for the management and maintenance of the grounds. The 3G will be added to their responsibilities. Following training, the grounds team will perform the routine maintenance required to keep the pitch playing to the required standard in line with the ongoing business plan.</p> <p>All routine maintenance will be carried out using specific equipment purchased for the task. Routine maintenance will include:</p> <ul style="list-style-type: none"> <li>• Litter picking</li> <li>• Leaf blowing</li> <li>• Drag brushing</li> <li>• Rubber top ups</li> </ul> <p>In addition to the routine maintenance, a specialist maintenance contract will be in place which will see contractors attend site at least 6 times per year to provide specialist maintenance, provide additional support and to perform regular pitch inspections. Investment in maintenance will help protect the facility and ensure that it continues to be of the desired quality, attracting the community use required to build up the sinking fund needed to replace the pitch when needed. At current prices, it is prudent to set aside monies into the sinking fund.</p>

On the basis of the above justification, we consider the proposals would give rise to a considerable benefit to the wider community through the provision of an enhanced playing facility.

#### 4.11 Identifying the need

Uxbridge Football Club were formed in 1871 and are one of the oldest football clubs in the England. They are full members of the Football Association, have played in the FA Cup competition in every year of its existence and currently compete in the Isthmian League South-Central Division at Step 4 of the National Game System. They also run an Under 23 team and Under 18 youth team.

The Club acquired the freehold of the present site in 1978 and many of the current facilities date from that time or earlier and are in need of extensive renovation. In particular, the dressing room building and associated facilities date from the 1950's, they are situated a considerable distance from the playing pitch and are in modern parlance environmentally inefficient.

The two current grass football pitches are sited on remediated land which has been the cause of significant undulations to form within them over the years, particularly following changes to the watercourse during the development and expansion of the adjoining Stockley Park Business Estate, commenced in the early 1980's and continuing at present. The proposed replacement pitch surface with properly engineered artificial grass would eliminate the undulations, permit play during all weather conditions and enable extensive community use. The requirement for new artificial pitch facilities in this area of the London Borough of Hillingdon has never been greater. The population in the local area has increased considerably over the last 10 years and only looks to grow further with new housing and transport links being constantly added to meet need and demand. The importance of having an affordable and safe sporting venue, supervised at all times, in the local community has never been greater with crime and other anti-sociable behaviours on the rise in this relatively deprived part of the Borough.

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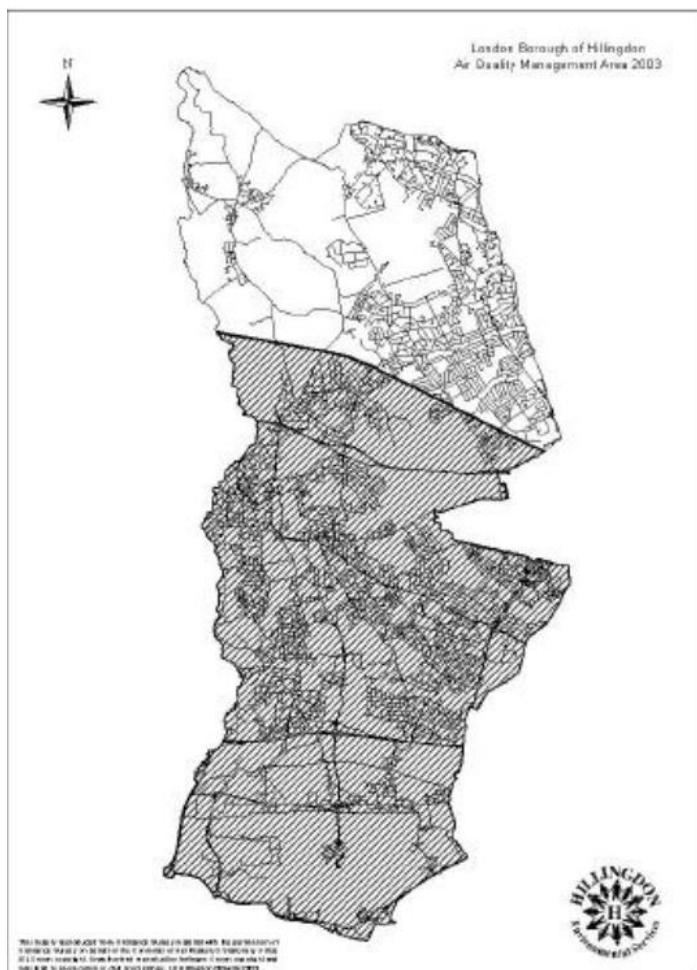
SSL project code	SSL2475A		19
Client	Uxbridge FC		
Document Title	Design and Access with Planning Statement		

## 5. Air Quality Assessment

### 5.1 Introduction

The proposal constitutes major scale development as the area involved is over 10,000m<sup>2</sup>. The site is also within the Hillingdon Air Quality Management Area. An assessment of the air quality for the proposed development is therefore provided in this section to inform the proposed planning application.

The image below sets out the Air Quality Management Area for the Borough, taking up over 50% of the borough:



### 5.2 Air Quality Policy and Guidance

Air Quality Directive 2008/50/EC1 introduced legally binding "limit value" targets for the member governments to reduce air pollution to concentrations at which minimal effects on health are likely to occur. The directive was transposed into law through the Air Quality (England) Standards Regulations2 with air quality objectives and dates they were to be achieved by.

The Environment Act 1995 introduced the requirement for local authority management of air quality. Part IV of this Act details the duties of local authorities in carrying out their local air quality management (LAQM) to tackle poor air quality. In 2003 Hillingdon Council declared an Air Quality Management Area. This was followed by the development of an Air Quality Action Plan which was adopted by Cabinet in 2004. This was revised in 2009 with the New Air Quality Action Plan (2019-2024). This includes the submission of annual reports to the Greater London Authority (GLA) for approval.

The NPPF sets out within paragraph 174(e) that:

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

*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*

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SSL project code	SSL2475A		20
Client	Uxbridge FC		
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Paragraph 186 of the NPPF sets out:

*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.*

Planning Practice Guidance (PPG) for air quality has been produced that gives indication of details the local authority may want to consider when there are concerns about air quality, special requirements such as the height of chimneys and securing mitigation measures through planning conditions and obligations. The PPG considers that dust can also be a planning concern for effects on local amenity. The guidance considers that assessments should be proportional to the nature and scale of development proposed and the level of concern about air quality.

Policy SI1 of the London Plan sets out:

**Policy SI 1 Improving air quality**

*A Development Plans, through relevant strategic, site-specific and area based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.*

*B To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:*

*1) Development proposals should not:*

- a) lead to further deterioration of existing poor air quality*
- b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits*
- c) create unacceptable risk of high levels of exposure to poor air quality.*

*2) In order to meet the requirements in Part 1, as a minimum:*

- a) development proposals must be at least Air Quality Neutral*
- b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures*
- c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1*
- d) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.*

The London Borough of Hillingdon (2020) Local Plan Part 2 (Development Management Policies):

**Policy DME1 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.*

### 5.3 Analysis

The existing site is a football club, where there are a number of vehicular movements into and out of the site on any given day. The proposed development is not expected to result in an increase in vehicle numbers during peak times. The site is surrounded by industrial premises where there are a number of vehicular movements during the day. Therefore, the site and surrounding area will not see a rise in traffic levels.

Pollution to the air will be managed during the construction phase in order to reduce impacts to a minimum. This will involve the following measures:

- Mains electricity supply will be used in preference to generators where practicable
- Modern, well maintained plant equipment that is shut off when not in use
- No fires permitted on site and fuels/oils will be stored in secure, sealed, labelled containers

Effective planning and management of dust will be required during the construction programme. This will require a thorough understanding of the construction programme, the operations and their likely impact due to the changing weather conditions. Dust generated by the construction operations will be minimized by the following:

- Ensure dust generating materials transported to and from site are covered by tarpaulins which will be securely fitted.
- Traffic speed on site to be lowered to prevent the generation of dust, and if necessary routes damped down with water.
- Wetting down of areas to reduce dust in particular during hot, dry conditions .
- Dust migration restricted by the use of debris netting fixed to all the perimeter fences.

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## 6. Existing site photos



Main clubhouse building with 2 storey residential flat



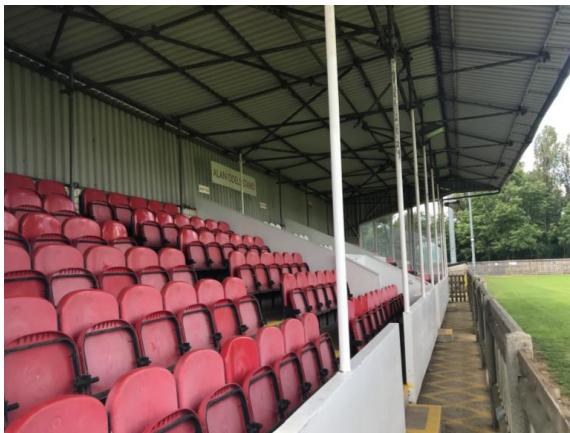
Existing changing rooms building



Existing hospitality and meeting rooms



Site area showing existing stand



Existing stand from pitch side



View from site area back towards the clubhouse accommodation

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NW corner of site, showing raised ground levels



View along North east site boundary



Existing stand showing settlement of ground



View across pitch towards the new building location

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## 7. Conclusions

In view of the above justification and having been assessed in the light of relevant planning policies and material considerations, we request this proposal is accepted.

- The proposed new Artificial Grass Pitch (AGP) will replace an existing grass pitch, thereby providing access to greater quantity of provision in a suitable location and supported by effective and appropriate management arrangements, whilst implementing best practice construction techniques to minimise waste and pollution
- The proposal would give rise to a considerable benefit to the wider community through the provision of an enhanced playing facility and the opportunity for usage throughout the year, in accordance with Section 8 – Promoting Healthy Communities of the National Planning Policy Framework (2021). The proposed AGP would be available for use by partner organisations and community groups.
- The proposal would be a suitable form of development within the Green Belt and would have a minimal impact on the openness and permanence of the Green Belt in accordance with Section 13- Protecting Green Belt Land of the National Planning Policy Framework (2021).
- The proposal would ensure that surface water run-off is effectively managed and does not increase flood risk elsewhere, in accordance with Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change of the National Planning Policy Framework (2021).
- The proposal would ensure that noise emission created by use of the development is not expected to adversely affect nearby residents by way of noise, in accordance with Section 15 – Conserving and enhancing the natural environment of the National Planning Policy Framework (2021).
- The proposal would contribute to the fulfilment of the site and local community need by providing improved facilities.
- The Artificial Grass Pitch (AGP) and associated facilities would not result in an unacceptable impact upon the character, appearance or visual amenity of the surrounding area.
- The proposal would not result in an unacceptable impact to any residential amenity or have a detrimental impact on the private amenity of the residents in terms of impacts from noise and/or light pollution.
- The proposal provides adequate on-site parking and necessary traffic management to meet the needs of the development and would not result in any harm to the safety of the surrounding public highway network. Traffic movement to and from the proposed Artificial Grass Pitch (AGP) will be such that they would not overlap or create undue congestion within the surrounding vicinity of the application site and therefore not result in an increase in demand for off-street parking or have a detrimental impact on highway safety.

### End of document

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