

6 January 2016

Gunnersbury Park

in the London Borough of Hounslow

planning application no. P/2015/4520

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Planning permission and Listed Building Consent for the redevelopment of the redundant bowls green, playing fields and garden nursery depot and existing car park sites within the wider Gunnersbury Park involving: removal of various greenhouses, glasshouses and lean-to structures within the garden nursery depot site together with the existing changing and cricket pavilions adjacent to the model farm complex; retention of the listed 'kitchen garden' walls originally associated with the Small and Large mansions; erection of a new two storey building on the site of the redundant bowls green comprising team changing rooms for the external sports facilities, '5-court' sports hall, multi-use studios and associated changing facilities, café, community room, archive store and office accommodation together with associated external works comprising new natural grass pitches for rugby, cricket, floodlit artificial grass pitches and floodlit tennis courts, multi-use games area, external gym equipment, associated external sports store, car parking provision, cycle storage, waste and recycling facilities and associated hard and soft landscaping.

The applicant

The applicant is **London Borough of Hounslow & London Borough of Ealing**, and the architect is **AFLS&P**.

Strategic issues

The strategic issues in the case relate to **principle of development (Metropolitan Open Land)**, **urban design**, **sustainable development** and **transport**.

Recommendation

That London Borough of Hounslow be advised that the application complies with the London Plan, for the reasons set out in paragraph 70 of this report and does not need to be referred back to the Mayor. The Council should, however, take account of the comments made in paragraph 70 of this report.

Context

1 On 26 November 2015 the Mayor of London received documents from London Borough of Hounslow notifying him of a planning application of potential strategic importance to develop the

above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 6 January 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008:

3D "Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and

(b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building"

3 Once London Borough of Hounslow has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 Gunnersbury Park is a public park of 76 hectares, situated within the London Borough of Hounslow, delineated by the M4 Motorway and Gunnersbury Cemetery to the south, the North Circular (A406) to the east, the rear gardens of residential properties fronting Lionel Road North to the west and the rear gardens of residential properties fronting Popes Lane (B4491) to the north. The A4 and A406 form part of the Transport for London Road Network (TLRN).

6 Although wholly situated within the London Borough of Hounslow, the northern and western boundaries of the Park border London Borough of Ealing, hence the park is utilised by the population of both boroughs.

7 Gunnersbury became a public park in 1926 and prior to this was a private estate occupied by a succession of owners, each of whom has left a legacy of historic structures and landscape features including 4 Grade II* and 17 Grade II Listed structures. The park itself is designated as a Grade II* Registered Landscape, Nature Conservation Site of Borough Importance (Grade II) and falls within the Gunnersbury Park Conservation Area.

8 Strategically, the site is also designated as Metropolitan Open Land (MOL).

9 Acton Underground station, served by the Central Line, is approximately 400m north east of the site and South Acton rail station, 1km east of the site. The site is served by four bus services, E3, H91, 440 and 65 which can be accessed from northern and eastern boundaries of the site. Accordingly, the site has a low to good Public Transport Accessibility Level (PTAL) of 1a to 4 (on a scale of 1a to 6b, where 6b is the highest); however this is also due to the entrance/exit location that is used to access the park.

Details of the proposal

10 The application relates to a site area of 22.23 hectares of the Park (approximately 30% of the Park's total area)

11 The application seeks the redevelopment of a redundant bowls green, playing fields, garden nursery depot and existing car parks, including the demolition of a number of buildings and structures within the Park, including greenhouses and pavilions, to develop a new sports hub comprising:

- A two-storey building comprising 5-court sports hall, team changing rooms for the external pitches, multi-use studios/flexible community space, sports hall changing rooms, museum archive store, café and ancillary offices.
- 5 No. senior football pitches (100m x 64m)
- 5 No. junior football pitches (91m x 55m & 73m x 64m)
- 2 No. 7-a-side football pitches
- 1 No. senior rugby pitch (110m x 70m)
- 3 No. senior cricket pitches
- 2 No. floodlit 3G artificial grass pitches (100m x 64m)
- 8 No. floodlit tennis courts (tarmac)
- 1 No. Multi-use games area (MUGA)
- Outdoor gym equipment
- 153 no. additional car parking spaces
- 154 no. additional cycle spaces
- Associated hard and soft landscaping

Case history

12 There are a number of historic planning consents across the Park, notably relating to the restoration and alteration of the Grade II* Listed Gunnersbury Park House (Large Mansion & Museum) and ad-hoc development within the Park relating to horticulture and outdoor recreation, none of which were referred to the Mayor.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan*
- MOL *London Plan*
- Biodiversity *London Plan*
- Urban design *London Plan*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG;*

- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy;*
- Historic Environment *London Plan*

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2015 Hounslow Local Plan and the London Plan March 2015 (Consolidated with Alterations since 2011).

15 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance
- The draft Minor Alterations to the London Plan (MALP) (2015)

Principle of development

16 The site is within Metropolitan Open Land (MOL). London Plan Policy 7.17 states that the Mayor supports the extent of Metropolitan Open Land (MOL) land and its protection from development having an adverse impact on the openness of it. It also highlights that the NPPF guidance on Green Belts also applies to MOL. The NPPF states that inappropriate development is harmful to the Green Belt (or in this case MOL) and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the MOL by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

17 This part of the Park is largely open and given over to formal sports pitch provision, currently configured as 6 No. senior football pitches, 1 No. rugby pitch and 15 No. tennis courts, with ancillary facilities including cricket pavilion (186 sq.m) and external changing facilities (321 sq.m). There is also an existing commercial nursery on the site (lease expiring in 2016) comprising a number of structures including greenhouses and outbuildings.

18 The proposed development would see the removal of the existing cricket pavilion, external changing rooms and nursery structures and the erection of a two-storey building (3,547 sq.m) for a variety of uses including sports hall, changing rooms for internal and external facilities, multi-use studios/community space, café, ancillary offices and storage for the Gunnersbury Museum.

19 The proposal would also see the quantity of external sports pitches increased across the site. In planning terms the most significant development would be the creation of 8 No. floodlit tennis courts (with associated 3m high perimeter fencing and 15 No. 8m high lighting columns), the creation of 2 No. floodlit 3G artificial grass football pitches (with associated 4.5m high perimeter fencing and 9 No. 13m high lighting columns) and a Multi-use Games Area (MUGA) which would also have a 3m high perimeter fence.

20 While the scheme represents an increase in additional development on site, paragraph 89 of the NPPF outlines exceptions to inappropriate development which includes *'provision of appropriate facilities of outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it'*.

21 The proposal would support outdoor recreation; however there is a significant quantum of new development is proposed. The proposal will therefore need to demonstrate *'very special circumstances.'* The applicant contends the following points allow for very special circumstances in this case:

Need for development

22 In relation to the need, the existing sporting facilities at Gunnersbury Park have deteriorated sharply in recent years due to the prevailing constraints on public expenditure and a resulting lack of investment. The joint applicants highlight that many of the existing leisure centres within the boroughs are at capacity and, with the anticipated levels of growth envisaged within the London Plan, the need for additional provision will only become more acute. The Hounslow Infrastructure Delivery Plan identifies the lack of sporting provision as a major barrier to increasing participation across the Borough and the facilities at Gunnersbury park are noted as being “*extremely poor*”. The site is therefore currently unable to perform an effective role as a strategic location for community sports.

23 The Site is allocated within the Hounslow Local Plan (Ref: 09) as a heritage asset, with proposals for the refurbishment of the listed buildings and the creation of a sporting hub. The joint applicants have also produced a 2026 Masterplan setting out the vision for the Park and how it will be delivered over the next 15 years. The development proposals would deliver the much-needed improvement and enhancement of the sports pitches as well as delivery of a sports hall which would provide changing facilities and community space.

24 There is therefore a compelling need for new and improved sports facilities on the site from the local community.

Benefits to the local community

25 The provision of new and enhanced community sport facilities is a clear benefit to the community. It is noted that there has been a larger quantity of formal sports pitches on the site, in the recent past, and the proposal would offer the opportunity to remedy this decline.

26 Policy 3.1 affirms the Mayor’s commitment to ensure equal life chances for all Londoners and where appropriate, to address barriers to meeting the needs of particular groups and communities. The policy requires development proposals to protect and enhance facilities and services that meet the needs of particular groups and communities. Policy 3.2 requires developments to improve health and promote healthy lifestyles to reduce health inequalities.

27 London Plan Policy 3.19 supports development proposals that increase or enhance the provision of sports and recreation facilities.

Impact on openness of MOL/Heritage

28 It is clear that outdoor sports and recreation is an appropriate use of MOL. Despite a net increase in the footprint of built development, the rest of the site would remain predominantly open as a result of the number of pitches. It is noted the tennis courts are being relocated to improve the setting of listed buildings, and key views have sought to be protected, in consultation with Historic England and this considered to accord with Policy 7.8.

29 The new sports hall building and car park is sited in a relatively central position, in an area currently occupied by some built development on the site. This would avoid a dramatic visual change in the form of development.

Summary

30 It is acknowledged that there is a need for the development and a need to enhance outdoor sports provision within the borough and improved facilities at the site. The development would provide for an essential needed community use providing benefit to the community. The applicant

has set out a convincing case for ‘very special circumstances’ in which development would be accepted on MOL. In addition to this, the applicant has demonstrated that impact on the openness of the MOL would be limited. The principle of the development is therefore acceptable in strategic terms.

Urban design

31 The proposed built development sits on, and adjacent to, existing built development. The majority of the site would be occupied by sports pitches which will have little impact on the openness of the area and present no strategic design concerns. However, care needs to be given to the impact of the floodlighting on the character of the park and the listed buildings.

32 The height and massing of the proposed buildings themselves are driven by the internal requirements of the proposed uses and cannot be modified significantly. Of these the largest and most prominent is the indoor sports hall which needs to have a clear internal height. The sports hall building utilises a natural palette of colours and proposes gabions formed of grey aggregate to the ground floor, with dark brass metal cladding. The upper height of the building would be clad in black painted timber. The proposed use of ‘natural’ materials is welcomed, but we would advise the Council to satisfy themselves as to the suitability of the use of black for the timber finish, given it could appear ‘heavy’ and ensure the finish is durable to ensure there is no uneven discolouration, due to weathering.

Inclusive access

33 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion, not just the minimum.

34 The development incorporates inclusive design with step-free access and a well-designed internal layout for the sports hall building. The scheme complies with London Plan policy 7.2 and is acceptable in this regard.

Sustainable development

Energy

35 The application has been submitted with an energy strategy which outlines the approach to carbon reductions following the London Plan Policy 5.2 energy hierarchy. In relation to the ‘lean’ stage, a range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters would be improved beyond the minimum backstop values required by building regulations. Other features include LED lighting and energy controls, mechanical ventilation with heat recovery and variable speed drives.

36 The demand for cooling will be minimised through vertical shading fins, exposed thermal mass and solar control glazing. The fitness studios and museum are provided with active cooling. The applicant has stated that an overheating assessment has been carried out in line with CIBSE TM52 and that all rooms pass the criteria. The information provided in Appendix B should be clarified as the first table would seem to suggest that two of the three overheating criteria have been failed, which would mean an overall fail against CIBSE TM52.

37 The development is estimated to achieve a reduction of 0.5 tonnes per annum (0.1%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. BRUKL sheets for the efficiency only case have been provided to support the savings claimed.

38 In relation to the 'clean' stage of the hierarchy, the applicant has carried out an investigation and identified that there are no existing or planned district heat networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

39 The applicant has also stated that the following will be provided:

- Gas boilers
- Waste water heat recovery
- A VRF heat pump system to provide cooling which will include heat recovery.

40 The applicant should explain how the heat recovery systems will be integrated with a communal heating system served by boilers. The applicant should also explain how the whole system will be designed to allow future connection to district heating (e.g. operating temperatures, space for heat exchangers).

41 The applicant should confirm that all parts of the building will be connected to a site heat network.

42 The site heat network should be supplied from a single plant room. Further information on the floor area and location of the plant should be provided.

43 A reduction in regulated CO₂ emissions of 123.4 tonnes per annum (24.5%) will be achieved through this third element of the energy hierarchy. These saving have been supported by a BRUKL sheet.

44 In relation to the final 'green' stage of the hierarchy, the applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 920m² (92kW) of solar PV. A roof plan showing these should be provided. A reduction in regulated CO₂ emissions of 53.7 tonnes per annum (10.7%) would be achieved through this stage of the hierarchy.

45 Overall, a reduction of 177.6 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations complaint development is expected, equivalent to an overall savings of 35.3%. This exceeds the target within Policy 5.2 of the London Plan however the comments above should be addressed before compliance with London Plan energy policy and the carbon savings can be verified.

Water

46 The site is within Flood Zone 1 and is at low risk of surface water flooding. The majority of the surrounding area is also at low risk of significant surface water flooding. The development is therefore acceptable in principle, in accordance with London Plan policies 5:12.

47 The flood risk assessment states that:

- the Sports Hall building will have a biodiverse roof;
- retention ponds linked by swales are proposed, draining the north of the site to Potomac Lake at the south-west of the site;

- all surface water for the Sports Pavilion and Car Park (east) is to drain to surface water storage, consisting of an attenuation tank and the sub-base of the proposed car park;
- surface water drainage for the Sports Pitches, Tennis Courts and multi-use games area will drain through a permeable surface, and distributed via perforated pipes surrounded by gravel; and
- proposed surface water drainage networks shall be designed to not flood for a 1 in 100 year storm event inclusive of a 20% allowance for climate change; and
- a greenfield runoff rate will be achieved for those impermeable areas that are currently permeable.

48 These measures would meet the requirements of London Plan Policy 5.13 and should be secured by appropriate planning conditions.

Green Infrastructure and Biodiversity

49 The measures proposed to reduce light pollution impacts on bats and other species are welcomed, as are the green roof, proposed hedge, tree planting, biodiverse swales and wildflower meadows.

50 These measures help contribute to London Plan policies 5.10 (urban greening), 5.11 (green roofs) and 7.19 (biodiversity).

51 Given the nature and location of the proposals, it should be possible to deliver a net gain in habitats and biodiversity. This should be secured by appropriate planning conditions.

Transportation

Car Parking

52 There are no standards relating to sports facilities such as this in the London Plan. Therefore, the level of parking proposed should be fully justified through the transport assessment. As part of the development proposals there will be a total of 283 car parking spaces, including the 130 existing spaces. A new car park will be provided at the existing 'Greenscene' site which is located to the east of the proposed development site and a total of 153 new car parking spaces will be provided. Additionally, the two existing car parks will be upgraded and rationalised. All three car parks will be Pay and Display.

53 17 Blue Badge parking spaces will be provided within the existing Greenscene site which is 6% of the total provision and is in accordance with London Plan (2015).

54 Transport for London (TfL) welcomes the addition of Blue Badge parking to the development site. However the overall car parking provision is an increase of 56 percent on the current level in place. Whilst it has been noted that this provision is based on the trip generation assessment which includes the possibility of a 18-hole golf course being constructed on site, this is still deemed to be excessive. TfL therefore requests that this level of car parking be reduced with more robust evidence and justification provided of the exact needs.

55 Regardless of the amount of provision ultimately agreed, TfL requests that 10 percent of the spaces be equipped with active electric vehicle charging points (EVCP) and a further 10 percent with passive provision of EVCP for future demand.

56 A car park management plan has been drafted for the proposed 'Greenscene' car park and also the two existing car parks, which is welcomed by TfL. It is anticipated that the car park management plan will be operated by Hounslow Council.

Cycle Parking

57 There are ten existing cycle parking spaces provided within the park. These cycle spaces are in the form of Sheffield stands, four of which are located adjacent to the existing café and six of which are located close to the sports pitches.

58 The development proposes a total of 144 cycle parking spaces for the proposed new land uses. 118 cycle parking spaces will be provided within the park, adjacent to the various sporting activity locations via 59 Sheffield stands. A further 36 cycle parking spaces within the Greenscene car park, comprising of five long stay spaces and 31 short stay spaces for visitors to the sports hall. The applicant should also confirm the provision of shower and changing facilities for all staff employed on site.

59 TfL is satisfied that the proposed quantum of cycle spaces meets London Plan (2015) standards. Further guidance on cycle parking can generally be found in London Cycling Design Standards (LCDS) which complements the numerical standards set out in the London Plan, and gives recommendations on the qualitative aspects of cycle parking.

60 The London Plan refers to the need for 'easy access' and catering 'for cyclists who use adapted cycles'. This is an accessibility requirement; therefore the applicant should outline how these standards are met.

Coach Parking

61 It is understood that coach parking (drop off and pick up) currently occurs externally to the park and this arrangement will be maintained. As part of the development proposals, a single coach parking bay will be provided to the north of the Greenscene car park within the site and to the west of the access. TfL supports the proposal for a dedicated coach bay on the site, however should the car parking provision be reduced the applicant should identify a suitable location for an additional coach bay.

Construction Logistics

62 TfL expects the development to be supported by a Construction Logistics Plan (CLP). This is accepted by the applicant who is committed to providing a CLP. This plan should be secured by condition and/or through legal agreement as appropriate and should accord with TfL guidance.

Delivery and Servicing

63 A single servicing bay, which will be for the sole use of the Leisure Centre and ancillary uses, is proposed on site. The integration of the servicing facility into the car park is welcomed by TfL as it will ensure that vehicle movements do not cross heavily trafficked pedestrian links. A Delivery and Servicing Plan (DSP) should be secured by condition.

Travel Plan

64 A Framework Travel Plan for the proposed development has been provided which will be followed by a Full Travel Plan. The Full Travel Plan will need to be produced in accordance with

TfL travel planning guidance and will be required to be secured, funded and monitored through a section 106 agreement, with a range of the indicated potential measures developed into specific agreed outcomes.

65 In summary, TfL has does not have significant concerns over the current proposals however consideration should be given to reducing car parking numbers and provision of EVCP. However, it is recognised that the proposals are in compliance with the relevant policies of the London Plan.

Mayoral Community Infrastructure Levy

66 In accordance with London Plan Policy 8.3 the Mayoral Community Infrastructure Levy (CIL) came into effect on 1 April 2012. All new developments that create 100 sq.m. or more additional floorspace are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floorspace in the London Borough of Hounslow.

Local planning authority's position

67 The local authority is seeking to take the application to Committee on 14 January 2016, with a recommendation for approval.

Legal considerations

68 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

69 There are no financial considerations at this stage.

Conclusion

70 London Plan policies on principle of development, urban design, inclusive access, sustainable development and transport are relevant to this application. The application complies with the London Plan. The reasons are set out below:

- **Principle of development:** The applicant has set out reasons for 'very special circumstances' in which development would be accepted on MOL and as such the principle is accepted in strategic terms. Overall the scheme is exemplary and will provide for a significant improvement to existing sports and recreation facilities in West London that will help to support London's continued growth. The two local authorities are commended for the approach they have taken to the effective use of public assets;
- **Urban design:** The proposed design is generally supported in line with London Plan policies contained in chapter seven and the applicant has demonstrated that there will be limited

impact on openness of the MOL, compared to existing. Council officers are advised to satisfy themselves on material details and finishes, and their impact upon the wider park as a designated heritage asset, in line with Policy 7.8.

- **Inclusive access:** The scheme complies with London Plan policies 7.2 and is therefore acceptable.
- **Sustainable development:** The proposed measures within the energy strategy meet the policy requirements of Policy 5.2 of the London Plan and should be secured by condition.
- **Transport:** TfL request further justification of car parking levels and consideration should be given to ECVP provision. It is recognised that sports and leisure uses are not covered within the London Plan parking standards and therefore there is no issue of non-compliance. A Car Parking Management Plan, Construction Logistics Plan, Delivery & Servicing Plan and Full Travel Plan should be secured via appropriate conditions or legal agreement.

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