

Committee Date	27.05.2021	
Address	Eltham College Grove Park Road Mottingham London SE9 4QF	
Application Number	19/01865/FULL1	Officer - Victoria Wood
Ward	Mottingham And Chislehurst North	
Proposal	New astro turf hockey pitch, hockey training area and associated floodlighting	
Applicant	Agent	
Mr Guy Sanderson	Mrs Helen Locking	
Headmaster Grove Park Road Mottingham London SE9 4QF	Clareville House 26-27 Oxendon Street London SW1Y 4EL	
Reason for referral to committee	Significant Objections	Councillor call in No

RECOMMENDATION	Application Permitted
-----------------------	-----------------------

<p>KEY DESIGNATIONS</p> <p>Biggin Hill Safeguarding Area Green Chain London City Airport Safeguarding Metropolitan Open Land Smoke Control SCA 51</p>

Representation summary	<ul style="list-style-type: none"> • Letters were sent to neighbours on the 24/07/2019, 17.09.2021, 21/10/2021 and 21.04.2021. • A press advert was published 07.08.2019
-------------------------------	--

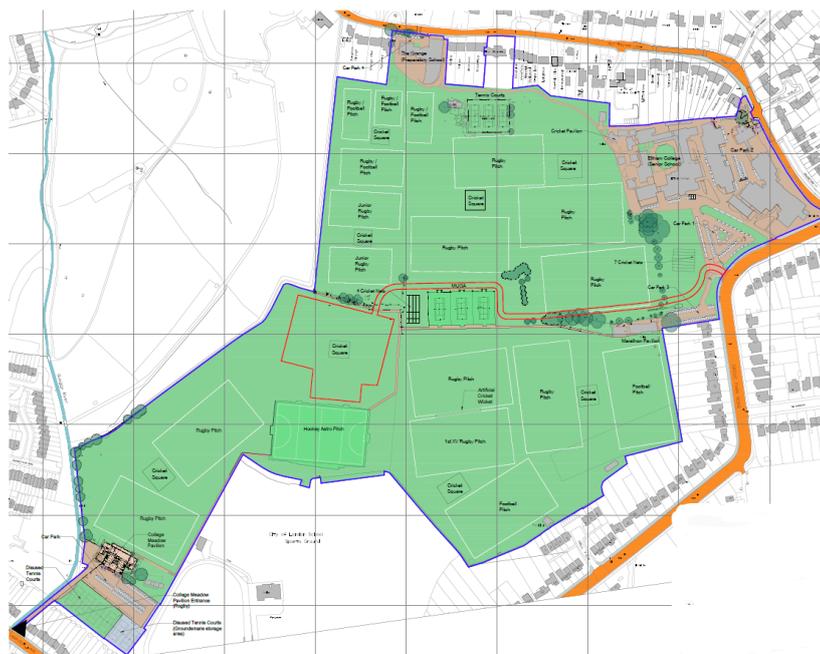
Total number of responses	103
Number in support	80
Number of objections	22

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The development would not result in a harmful impact on the character and appearance of the area;
- The character and appearance of the area would be preserved;
- The development would not adversely affect the amenities of neighbouring residential properties;
- The development will not have a detrimental impact on neighbouring wildlife subject to appropriate conditions.

2 LOCATION

2.1 The Site is bounded by Eltham College (junior school), residential properties and Mottingham Road to the North; Eltham College (senior school) to the North-East; residential properties, two car parks and Grove Park Road to the East; residential properties, Grove Park Road, Marvels Lane and the City of London School Sports Ground to the South; and trees, unnamed open space, residential properties and Quaggy River to the West.



Site Location Plan

3 PROPOSAL

- 3.1 Planning permission is sought for the installation of a new astro turf hockey pitch, hockey training area and associated floodlighting.
- 3.2 The proposals consist of a sand dressed hockey astro turf pitch and warm up area with associated green powder coated mesh rebound fencing and floodlighting. The facility includes dug out areas and an area for spectators to view games however this will not contain any seating. Changing/showering for the new facility will be provided by the existing changing facilities located in the Marathon Pavilion to the east of the proposed new pitch and accessed via an existing laid footpath across the sports fields.
- 3.3 All access to the new facility, including during construction, will be from the existing Grove Park Road access. Following construction, the proposed construction access will be removed, and the land returned back to be part of the existing sports fields. Access to the new facility will then be via the existing footpaths on site which serve the existing facilities from the main College buildings and Marathon Pavilion.

The application is supported by the following documents:

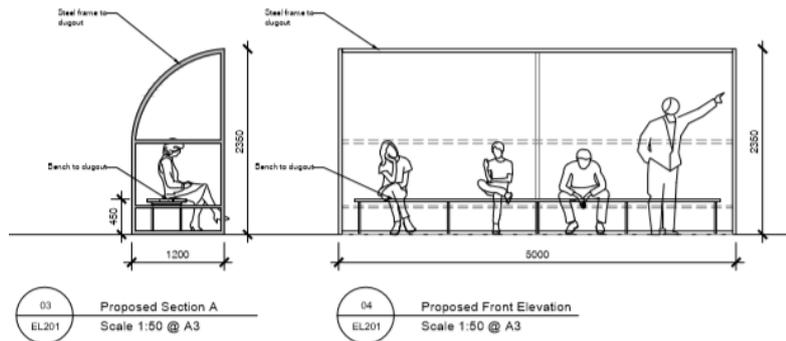
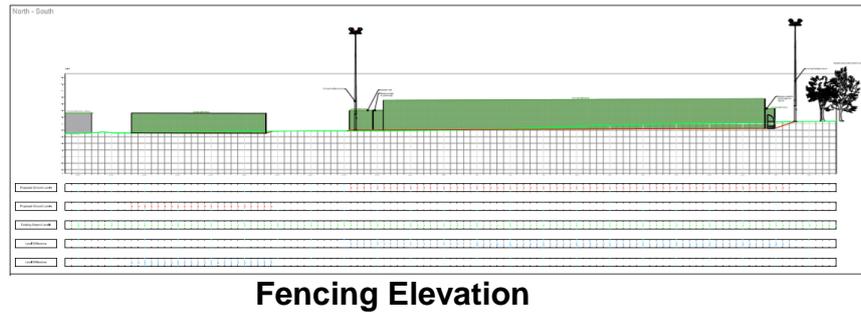
- Application forms,
- Application drawings,
- Proposed Drainage Layout
- Proposed Floodlighting Layout
- Proposed Earthworks Layout
- Supporting Statement
- Flood Risk Assessment
- Highway Technical Note
- Ecological Appraisal



Location of Proposed Hockey Astro Pitch.



Block Plan for Proposed Development



4 RELEVANT PLANNING HISTORY

4.1 There is an extensive planning history for this site over a long period. The most relevant history is listed below and is specific to the area of the site in this current application:

02/00382/OUT - Installation of artificial all weather playing surface to sports ground, erection of 8 x 12.4 metre high floodlights, creation of car park of 104 spaces and 4 coach spaces, disabled ramp to pavilion and additional palisade fencing to perimeter of site (OUTLINE). Consent was granted on 02.07.2002.

05/02392/FULL1 - Details of access to Marvels Lane to comply with condition 1 of 02/00382 granted for installation of artificial all weather playing surface to sports ground, erection of 8x12.4 metre high floodlights, creation of car park of 104 spaces and 4 coach spaces, disabled ramp to pavilion and additional palisade fencing to perimeter of site (OUTLINE). Permission was granted on 25.08.2005.

07/00612/OUT - Demolition of existing sports pavilion and construction of new sports pavilion (OUTLINE). Consent was granted on 26.03.2008.

11/02397/FULL1 - Single storey rear extension to provide replacement changing rooms. Planning permission was granted on 10.11.2011..

12/01011/FULL1 - Formation of car park with 70 car parking spaces and 4 coach bays with overflow area to provide 34 additional car parking spaces. Chainlink and palisade fencing, 3.9m high lighting columns, security hut and cycle parking. PART RETROSPECTIVE. Permission was granted on 11.07.2012.

12/01614/ADV - Temporary signage for Olympic venue comprising 6 x banner signs and 12 fence mounted signs. Advertisement consent was granted on 25.07.2012.

12/01702/FULL1 - 2 single storey replacement buildings for groundsman's storage and temporary water tank. RETROSPECTIVE APPLICATION. Permission was granted on 28.08.2012.

14/01741/FULL1 - Installation of water storage tank. Planning permission was granted on 28.07.2014.

18/02786/FULL1- Temporary planning permission until June 2019 for the construction and use of a temporary spectator stand accommodating up to 366 seated spectators on land at College Meadows, Eltham College, Grove Park Road, Mottingham to provide weatherproof seating for visitors and members of the existing sporting fixtures and clubs held at Eltham College – Permission was granted on 06.02.2019.

18/04401/ADV - Installation of three non-illuminated free-standing signs on the corner of Grove Park Road and Mottingham Lane – Advertisement consent was granted on 29.04.2019.

18/05234/FULL1 - Construction of two new lodges at Eltham College including one at the main entrance on Grove Park Road for security and deliveries, and a second lodge and sliding metal gate adjacent to the Mottingham Lane entrance for security as well as; all other ancillary, enabling and associated works – Permission was granted on 22.03.2019

20/00133/ADV - 4x Non-illuminated banner signs – Pending consideration

Other relevant history is considered to be:

11/03489/FULL1 - Replacement single storey pavilion / changing rooms building to Marathon Pavilion at Eltham Collage. Permission was granted 01.03.2012 for a replacement pavilion building located approximately 120m to the east of the location of the new pavilion building.

5 CONSULTATION SUMMARY

A) Statutory

Highways Lewisham – No comments received

Highways Bromley – No objections

- No objections raised to proposals subject to conditions regarding Construction Management Plan, Parking Layout, Cycle Parking, Drainage, Access and use of materials.

Lewisham Planning – No objections

- Lewisham Planning Service does not object to the proposal. It is reiterated however the importance of the consultation process to be followed with Sport England, and ensuring ecological impacts are acceptable given the proximity to the habitat sited within the borough of Lewisham.

Sport England – No objection

- No objections to the is application which is considered to meet exception 5 of the Sport England's Playing Fields Policy and Guidance document. The LPA should however include conditions

GLA – No objection

- Given the nature of the proposal the GLA conclude that the proposal do not give rise to any strategic planning issues and is therefore not referable.

Bromley Ramblers Group – No objection

- Pleased to advise that the above application does not have any impact on our activities.

B) Local Groups

The Mottingham Residents' Association - Objection

1 Floodlights and Light Pollution –

- the proposed 6 x 15 metre high floodlights will not 'spill' light outside of the designated area is not the case. Local residents already suffer from the effects of the current floodlights as they are regularly left on after users have left the pitch area. City of London School extinguishes their lights when not in use and City of Westminster, restrict the use of floodlights after 9:30pm to only a relative few evenings a year.
- Eltham College, City of London School, the woodlands adjacent and the open land down to and beyond the A20 road, provide a significant area offering 'dark skies'. Both National and Bromley guidelines emphasis the value of dark skies in a built up area. The addition of another set of floodlights will cause further loss of amenity to residents as will the necessity for lighting along the path from the carpark.

2 Need for Proposed New Facilities –

- Whilst the application asserts that the facility will be used by College pupils, the proposal is for a sophisticated pitch, complete with dugouts, more akin to the needs of adults than children. School finishes at 16.00, and even allowing for after school club activities, the proposal would seem excessive.

3 Use by Outside Group –

- Residents are very concerned at this proposal. Whilst the Old Elthamians Hockey Club is an established group, it has now joined with a Blackheath Club, already doubling the use of facilities. The proposal to, effectively, hire out the facilities to other clubs will significantly increase use. Use of the car park and changing facilities will cause noise and intrusion to neighbouring residents and increase the pressure for lengthening the hours of opening of the bar facilities at the Marathon Pavilion in contravention of Local Plan Policy 58c. The sophisticated pitch referred to above appears to be aimed at this increased adult usage and not College usage.
- Policy 28 of Bromley's Local Plan which encourages 'the dual use of educational facilities by the wider community' cannot be used to support this application at the same time that Eltham College has arbitrarily removed the right of neighbouring residents to use its playing fields, through erecting perimeter fencing immediately behind all adjoining residents gardens. Many residents have enjoyed access to the fields for recreation for more than 30 years. The legitimate claim for easement was refused.

4 Flood Risk Assessment –

- The Flood Risk Assessment provides a optimistic picture of the flood risk in the area. A road drainage ditch runs from the road, between 50 and 52 Grove Park Road, then for most of the length of the Eltham College boundary with City of London. Following heavy rain, lack of maintenance increases the risk of flooding to homes and the Marathon Field. It is clear that an annual probability of flooding of less than 1:1000 per annum is way outside local experience. Robust and well-maintained measures would be needed to mitigate any increased risk.
- The grant of this application, as submitted with no time restrictions on floodlight use, would cause detriment to local residents, in particular those whose properties back onto Eltham College's playing fields. There would appear be little or no educational gain since pupils, for the most part, are in school during daylight hours, and even so if granted early evening use would suffice. The main beneficiaries would be adults belonging to clubs, most of whom would have no connection with Mottingham. It is beginning to feel like the College grounds are moving towards becoming a multi use adult sports club rather than the enhancement of pupil facilities.
- The Mottingham Residents' Association asks that this application be refused and replaced with an application more suitable for use by pupils and with much greater educational value.
- It is noted that Bromley has recently received numerous letters of support, many using exactly the same, or very similar, wording. 350 children are referred to as needing facilities. It is difficult to see how one huge pitch, complete with floodlights and a dugout, will make any contribution to meeting these needs. Contributors have written from all over Bromley, Greenwich,

Chislehurst & Blackheath, amongst other places. These are not neighbours' or local residents comments. These 'supporters' will not suffer floodlights penetrating their blinds and windows. The assertion that local residents will also benefit from increased facilities is entirely incorrect. Residents of homes immediately surrounding the College, many of whom have enjoyed unfettered access to College and YMCA grounds for more than 30 years, had that right removed, summarily, by the College in 2019.

- The size and scope, of this proposal with huge floodlights & dugout, has more to do with adult needs than children's. The six floodlights, proposed for the new hockey pitch, will be 18.3 metres high (60ft) and far closer to homes than those surrounding the rugby pitch. They will be highly intrusive. Later evening use for matches will result in more parking & noise.

Following the revision of the pitch location the additional comments were received:

1 Planning -

- Planning Policy 28 of the 2019 Adopted Bromley Local Plan – Educational Facilities. This refers to proposals that maximise the use of existing “Education Land”. Technically, we would submit, the site location is “Metropolitan Open Land” rather than “Education Land”. The Policy also refers to ensuring that in all cases any proposal “secures the privacy and amenity of adjoining property”. With specific reference to the second point, in our opinion the Application does not fully address this issue. Light and Noise pollution remain key concerns. The Application is silent on the issue of Noise (see below).
- Planning Policy 54 of the 2019 Adopted Bromley Local Plan - South East London Green Chain. This states that development proposals will be required to respect and not harm the character or function of the Green Chain or the Green Chain Walk. Measures to protect this designated area are to include the use of suitable screening, landscaping or in appropriate areas the planting of native vegetation and enhancing of wildlife habitats. The current Ecological Appraisal does not fully consider the impact of this proposal and its impact on the environment, specifically when it comes to noise. (see below)

2 Impact on the Environment –

- The Ecological appraisal confirms that the Mottingham and River Quaggy SINC, which is in very close proximity to the site, and the adjacent treelines to the north and west are likely to be in regular use by foraging and commuting bats. This is very important information.
- The survey was a combination of a desktop study and one day on site – whilst helpful, the survey does not provide any assessment over time with the changing seasons, particularly migrating birds.

- The report references National Planning Policy Framework requirements and the Bromley Local Plan regarding biodiversity. The newly published London Plan 2021 adds further emphasis (8.6.4) to 'connections between protected sites – green corridors – that are often critical to helping sustain wildlife populations that would be vulnerable if they were confined to isolated areas of habitat'. At 8.6.5 it states that 'development proposals that are adjacent to or near SINCs or green corridors should consider the potential impact of indirect effects to the site such as noise, shading or lighting'.
- The Ecological Appraisal makes no reference to the impact on wildlife of the noise likely to be generated by the proposed development – we had been given to understand that it would cover this.
- Based on the information now available, there should be:
 - (1) Further ecological study over a period of time of the area of Green Chain and SINC adjacent to the site, to allow for migrating birds and other species
 - (2) A study of the likely impact of noise on wildlife.

3 Flood Lights and Light Pollution

- All the objections from local residents have included serious concerns about lighting. These combine the effects of current floodlighting on people's lives and homes, with the current proposals and possible future proposals. (The Ecological Appraisal makes reference at 3.7 to another application, which Eltham College is making in parallel, but details are not available of what this is, whether it is new or to gain approval for existing lights).
- The Supporting Statement, which is in the form of the letter from NTR Planning Ltd dated 25 April 2019, purports to set the Detail and the Planning justification for the proposal, but makes no reference to hours of operation, which would inform use of the lights.
- According to the England Hockey Website, for hockey, 350 Lux is considered suitable for training and club competition, while 500 lux is considered appropriate for non-televised national league and international competition. The website states these guidelines are what players find acceptable to allow hockey to be played in a safe and suitable environment. In the proposed floodlight drawing submitted as part of the Application the average lux level is 543lux, the minimum is 420lux and the maximum is 686lux. This appears excessive and well beyond what is required for school and club level participation. It will have an unnecessary impact on the overall environment. Also some elements of the submission refer to 15m floodlights whereas the flood light drawing refers to 18m. Both would be well above the tree canopy and a high point on the skyline unless retractable.
- More enhanced planting of trees and mature hedging to screen the pitch to the North and western boundaries could help reduce the impact to local residents and on wildlife.

4 Noise

- Noise has been raised in the majority of objections from local residents, and is of increasing concern.
- Noise is one of the key issues for planning applications of hockey pitches for sites close to residential areas. The main noise sources during a hockey match include, but are not limited to shouting, whistles and hockey balls hitting backboards etc.
- Noise can carry for a considerable distance (kilometres). Research shows there to be growing discontent (for local residents, teams and councils) around the construction of artificial sports surfaces where attention has not been given to noise at the earliest stage of planning and design.
- Relevant guidance can be drawn from 'Artificial Grass Pitch (AGP) Acoustics – Planning Implications'
 - [Sport England 2015]. The document brings together relevant noise guidelines and UK planning policies for the assessment of noise from Artificial Grass Pitches. It identifies the noise implications of the associated sound sources and recommends mitigation measures to limit adverse impacts upon noise sensitive receptors. Acoustic fencing is highly recommended. The most effective way of mitigating the impact noise is mounting resilient materials on the backboards. The mounting of one layer of commonly used turf on the backboards hardly provides any mitigation. As a result of fixing 3 layers on the backboards, around 10 dB reduction may be achieved.
- This Application fails to give any information about noise or refer to the potential impact of noise, or about hours of use. This has to be addressed, through a noise or acoustic survey as part of the Applicant and the Council's all round duty of care.

5 Traffic and use by outside groups

- The Supporting Statement suggests that the existing car parks of the College will not be in use out of College hours and therefore when the proposed facility is intended to be used by BEHC there will be sufficient car parking available to not impact on the local area. When it comes to weekend use this is just not true. On Sundays OE s Rugby takes place and this already leads to the car parks being full and cars parking on Grove Park Road as a result. The College itself also runs evening events that lead to the car parks being busy on numerous occasions throughout the year and there is the continual usage associated with the Eric Liddell Sports Centre and Gerald Moore Gallery.
- Separate to this application steps are already in hand to have double yellow lines put in place along that part of Grove Park Road adjacent to the College entrance due to existing traffic parking and waiting issues.

- The Supporting Statement makes reference to the facility being made available for use by the wider community beyond the College and BEHC. The impact of this is not considered in the Highway Technical Note.
- The Highway Technical Note states only 57% of BECH members travel by car during the week, that seems very low and is not supported by any information about Club membership. This rises to 67% at the weekends, which again seems low.
- A review of the comments on the Councils website reveals 79 supportive comments (please note that included in the submissions are some duplicates, some households sending in more than one letter and some with no comment at all). Although 76 of these seem to have come from the hockey club officials, members /players or parents of players who would travel to the site, only 6 of the households live locally in Mottingham, with 2 of those living very close at the College itself. There is one other comment of support from a resident of Grove Park Road, whose home backs onto the City Of London Sports fields rather than the College. This information shows that the majority of those commenting will travel a distance to the pitch, most probably by car. Some letters refer to the convenience of a single place to or make multiple drops of children, but none of the letters refer to accessibility by / use of public transport.
- How can the Council be satisfied that the additional car numbers referred to even take into consideration the impact of spectators and on match days the impact of the away team, who will almost certainly be travelling by car. There is also the pandemic to consider and the negative impact this is currently having on people's use of public transport. None of this is considered in the Highway Technical Note.

New Lodge Centre RDA Mottingham Lane Eltham - Objection

- Concerned that the existing floodlights are already intrusive and these are further away than the proposed new ones.
- This pitch is to be situated a very short distance from our boundary and we fear the noise and floodlights will have a detrimental effect on our activities, the welfare of the horses and the wildlife.
- Concern over the drainage from the site as they already experience water running from the playing fields across the green chain walk and flooding the land when it rains heavily.
- Not opposed to outdoor sporting activities but would like to be sure it will not have a negative impact on the surrounding area including their site and ask that if permission is granted the necessary restrictions are put in place to ensure neighbours do not suffer.

Kent Hockey Management Committee - Support

- Since the 2012 Olympics hockey has seen a massive resurgence and memberships at clubs is increasing.
- To sustain hockey at all levels we need children to start and continue playing and good facilities actively encourages and supports this. In addition a hockey club with a community ethos which Blackheath & OEs has fosters a feeling of belonging and team. In an age of social media and sedentary lifestyles having alternatives pass times for children (and adults!) is crucial.
- From a Kent hockey point of view having more AstroTurf pitches available across Kent and SE London for training and matches encourages growth in a sport which is now more popular than ever.

C) Adjoining Occupiers

Objections

Noise and Light pollution (addressed in para 7.4)

- Concerns over light and noise pollution as this is quiet residential area;
- The activity on site is already intrusive and disruptive the development will make it worse;
- No details have been provided over hours the floodlights will be used;
- Concern over the height of the floodlights and the overall coverage;
- There is no natural vegetation barrier to contain the light pollution from the new floodlights;
- The cumulative impact should be taken into account;
- Whilst the lighting assessment shows very limited light levels this is not our experience of the current floodlights;
- There is potential for even more late night matched and training;
- The College has increased its land ownership over the years and the intensification to benefit affiliated sporting clubs and activities but not necessarily the local residents;
- The lighting around the paths, new buildings and security lights will impact thought out the night-time;
- Increased noise will impact adversely on people using the Green Chain Walk

- What restriction will be in place to ensure the use is not expanded as the documents provided indicate that there would be future growth too including another club possibly using the facilities?
- The City of Westminster imposes very heavy usage restrictions on sports floodlighting at Lords cricket ground because of light pollution and the impact on local residents. I believe usage is only allowed after 7.30pm for 18 evenings per annum.
- No objection in principle to the introduction of an astroturf hockey pitch subject to the floodlight usage being restricted to no later than beyond 8pm - mid week

Traffic and Highways (addressed in para 7.6)

- Concern that Grove Park Road is already dangerous and anything that will lead to an increase in traffic and parking of cars will make the situation worse;
- Increase in traffic will impact on pedestrian, cycling and highway safety;
- The Technical Note does not give details on how extensively, and increasingly, the car-parking being relied upon for the proposed pitch is already used by the College and its wider community for activities outside of the normal school hours, especially at weekends;
- Concern that the technical note was carried out at the beginning of a national lockdown and therefore the information may not be a true representation when the restrictions are eventually eased;
- Why is the access from Grove Park Road and not Marvels Lane?
- There is no footpath on one side of Mottingham Lane and the other side the footpath is very narrow;
- It is unclear where the PTAL is taken from and if this has an impact on the assessment?
- There appears to be a new carpark marked as Car Park 2 but there is no reference to the impact on the area where the new car park is shown.

Trees and Wildlife (addressed in para 7.5 and 7.7)

- Impact on wildlife as the application does not address this;
- Concern that there are trees in close proximity, but the application documents do not make it clear if they are to be removed, retained or replaced;

- Concern that the increase in light pollution will impact on wildlife and horses in the adjacent land;
- Concern that more work is needed to follow up the ecological survey and request that a sound/acoustic survey is undertaken. Hockey is relatively noisy sport;
- A more in depth ecological appraisal should be under taken to assess the site and the adjacent areas over time looking at not only bats but other species too including birds.

Drainage (addressed in para 7.8)

- The drainage works are not clear, and the development is in close proximity to the River Qyaggy;
- There is no information regarding surface water run-off in the submitted documents.

Other issues

- There are a large number or support letters from people who do not live nearby and as such the application appears to support a commercial fund raising venture by the college;
- Would like reassurance that the access road is for construction only and ground will be reinstated once works are complete.
- The site plan is inaccurate and does not show all the new buildings;
- Also site plan does not differentiate between land that is owned and land that is managed;
- A number of letters of support have been received from the school and people linked with the club which is understandable however consideration should be given to those who leave nearby and the impact on them;
- The college have been turning off the floodlighting overnight and occasionally on the footpaths which is welcomed;

Support

- Well needed facility given the long waiting list and need for additional facilities in the area;
- The additional pitch will give wider access to the community to get involved;
- Good to get young people interested in hockey, sport and getting active;

- Modern flood lights are designed to NOT to give excessive light pollution as seen at Surbiton hockey club;
- The club given children a wide range of engagement with children/people in the community;
- Give children benefits from regular exercise, self-esteem, teamwork, etc.
- The school and college meadows have good access, parking and infrastructure to support the new pitch;
- The proposal will secure the growth and future of the club;
- Needed local facility to give local people the opportunity to use the facility without having to use public transport;
- Proposal would reduce road traffic as people won't have to travel so far to use other pitches/clubs;
- Bromley council have been lacking the funding to build/maintain facilities within the community;
- The club is a pioneer in south east London and currently has nearly 350 juniors and a long waiting list;
- Members are part of the local community;
- We live the rear of Eltham College and hear hockey being played on the exiting pitch and it is neither loud or intrusive and is always at a sensible hour of the day.

Comments

- Happy with the proposal but would like the school to enter in to a legal agreement requiring the school to open the facilities for hire/ use by the public.

D) Lewisham Ward Councillor

- I am contacting you on behalf of residents who have independently sent in their objections to the above application, and on behalf of the three Grove Park ward Cllrs.
- Concern that there are a large number of letters of support from people who do not live nearby, Surely the key issue is the impact on those directly affected whether living in LBL or LBB? I am sure that such out of area 'support' is not relevant to the process as support or objections to an application must be from those residents directly affected, or e.g. an historic or conservation society, etc.

- This area is an important site locally, being designated as MOL and also Green Chain. It has residential housing on three sides and crosses two Boroughs (Lewisham and Bromley) with the popular Green Chain walk running along the site boundary between Mottingham Lane and Marvels Lane. Part of this site is in Flood Zone 2.
- Application form is inaccurate regarding materials, flooding, biodiversity, hours of use, site visit.
- The cumulative effect of so much floodlighting, two hockey pitches with permanent floodlights and one Rugby pitch with very intrusive “temporary” unregulated floodlights, is that approx. three quarters of the College Meadow site will be, in the words of a resident, “lit up like a beacon”. This will have a detrimental effect on the residential amenities of surrounding residents and on the MOL/Green Chain.
- The above information reflects the concerns of residents in Grove Park ward and their objections to this application, which has gaps in information which should be provided, and some responses which are not accurate – as above detailed.
- Formally request that the height of the floodlights is reduced and likewise the hours of use. Residents have provided evidence of current issues with the existing floodlights and the moving of the pitch will not fully address the concerns of people living in the area and affected by the application, perhaps by way of a condition to the application.

6 POLICIES AND GUIDANCE

- 6.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-
- (a) the provisions of the development plan, so far as material to the application,
 - (b) any local finance considerations, so far as material to the application, and
 - (c) any other material considerations.
- 6.2 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that any determination under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.
- 6.3 The development plan for Bromley comprises the London Plan (March 2016) and the Bromley Local Plan (2019). The NPPF does not change the legal status of the development plan.
- 6.4 The application falls to be determined in accordance with the following policies:-

6.5 National Policy Framework 2019

6.6 London Plan

Policy D2 Delivering good design
Policy D14 Noise
Policy S5 Sports and recreation facilities
Policy G3 Metropolitan Open Land
Policy G6 Biodiversity and access to nature
Policy G7 Trees and woodlands
Policy T5 Cycling
Policy T6 Car parking
Policy T6.4 Hotel and leisure uses parking

6.7 Bromley Local Plan 2019

30 Parking
37 General Design of Development
50 Metropolitan Open Land
57 Outdoor Recreation and Leisure
58 Outdoor Sport, Recreation and Play
72 Protected Species
73 Development and Trees
119 Noise Pollution
122 Light Pollution
123 Sustainable Design and Construction

6.8 Bromley Supplementary Guidance

Supplementary Planning Guidance 1 - General Design Principles

7 ASSESSMENT

7.1 Principle of Development - Acceptable

7.1.1 The proposals are intended to improve the existing facilities for Eltham College students. From September 2020 Eltham College will extend its co-educational offer (currently sixth form only), starting with coeducational intakes into Year 3 (youngest year group in Junior School) and Year 7 (youngest year group in the Senior School). The school will be fully co-educational in all year groups by September 2024.

7.1.2 Whilst it is not anticipated that numbers on the College roll will change there will be a shift in gender balance, it is expected that there will be greater use of the hockey facilities as both the boys and the girls will receive regular teaching, train, play fixtures and tournaments on the facilities and at the Senior School competitive hockey will be split by gender. As such it would be difficult to only have one pitch available at a time.

- 7.1.3 Whilst the new facilities are required for the use of the College, as outlined above, the new facilities would also be available to Blackheath & Elthamians Hockey Club (BEHC) who already base themselves at Eltham College. The Supporting Statement sets out that it is also possible that the new facility could be made available to other clubs/community groups when not being used by the College. Once again, both BEHC and any other clubs/community groups using the new facilities would utilise the existing changing facilities at Marathon Pavilion and the existing footpaths across the site. Car parking is to be provided by the Marathon Pavilion car park (and other College car parks accessed from Grove Park Road) which will not be in use during any use of the facilities by others as this would only be when the College was not using the facilities (out of College hours). If members are minded to grant consent it is recommended that this can be controlled by condition.
- 7.1.4 There is broad support in the development plan for facilities for outdoor sport and recreation. The site offers options for additional and upgraded existing sporting facilities. It is clear that there is a need for additional sporting facilities has been outlined in the justification provided by the applicant.
- 7.1.5 The above policies in respect of sporting need clearly provide support at all levels for these to provide improved facilities for teaching and associated facilities. Consideration of the impact on the MOL and on the amenities of neighbouring residential properties along with compliance with all other relevant planning policies still, however, needs to be addressed and a balance struck when assessing all the relevant planning issues and material considerations in such a case.

7.2 Impact on the Metropolitan Open Land (MOL) - Acceptable

- 7.2.1 The site is located in Metropolitan Open Land (MOL) which is afforded the same level of protection as the Green Belt with the main school site being located outside this designation. Policy 50 seeks to protect the MOL from inappropriate development, permission will not be given for inappropriate development unless very special circumstances can be demonstrated that clearly outweigh the harm by reason of inappropriateness or any other harm. This is supported by Policy G3 of the London Plan which categorises MOL as being equal in importance to Green Belt land in terms of the level of protection afforded to it, and requires very special circumstances to be demonstrated where development is proposed.

Policy 50 states that:

The Metropolitan Open Land (MOL) will be given the same level of protection as Green Belt. The exceptions to inappropriate development are consistent with Green Belt policy and permission will not be given for inappropriate development except in very special circumstances.

7.2.2 The openness and visual amenity of the MOL shall not be injured by any proposals for development within or conspicuous from the MOL which might be visually detrimental by reasons of scale, siting, materials or design.

7.2.3 Furthermore to the same effect as in Green Belt as set out in Policy 49, in areas of Metropolitan Open Land the construction of new buildings will be inappropriate, unless in this case it is for the purposes of appropriate facilities for outdoor sport and outdoor recreation which preserve the openness and do not conflict with the purposes of including land in it.

7.2.4 Sport England has stated that they do not wish to raise an objection to this application as it is considered that the development is for an outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

7.2.5 Therefore, on balance it is considered that the proposal is for appropriate facilities for outdoor sport and therefore the proposal would comply with Policy 50 of the BLP in that it would meet one of the specified exceptions to inappropriate development, and does not conflict with the purpose of including the land on which it is sited within the MOL.

The proposal is for a new astro turf hockey pitch, hockey training area and floodlights which would support the existing function of the existing outdoor sport and recreation facility. The astro turf hockey pitch and hockey training area together with the floodlights is considered to be an appropriate form of development given that it is to support outdoor sporting use of the land. The development is sensitively sited within the site and relatively modest in scale with the proposed green powder coated mesh rebound fencing is a lightweight material and will maintain the openness of the MOL and allow for views through. Whilst this will be a new development in the MOL, given that it is supporting the existing function on site it is considered that the proposal would not conflict with the purposes of including land within the MOL and together with the temporary nature of the development it is considered that the proposal will not be detrimental to the MOL, and as such it is considered that this element would comply with the above policies.

7.2.6 The site is also sited within the Green Chain and as such Policy 54 of the BLP is relevant. Development proposals will be required to respect and not harm the character or function of the Green Chain and the Green Chain Walk. For the reasons identified above, it is considered that the proposals will not detrimentally affect the character or function of the Green Chain or the Green Chain Walk.

7.3 Design – Layout, scale – Acceptable

7.3.1 Design is a key consideration in the planning process. Good design is an important aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

7.3.2 Paragraph 124 of the NPPF (2018) states that 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 communities.

7.3.3 Paragraph 127 of the NPPF (2018) requires Local Planning Authorities to ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). New development shall also establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

7.3.4 London Plan and Bromley Local Plan policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design.

7.3.5 *Astro turf pitch and hockey training area:*

7.3.6 By its nature the proposed astro turf pitch and hockey training area would be substantial in size, however the application site is large and as such the proposal would be comfortably accommodated within it and it would not appear overdeveloped or cramped in this respect. The proposal would be positioned to the north of the existing Hockey Astro pitch within the development site. The proposed design and external materials would be appropriate to the function of the development and to the site and the proposed location of the development on the site. The proposed external materials could be managed by planning condition.

7.3.7 *Fencing:*

7.3.8 The proposed enclosed fencing will be 4.5m in height and will be steel open mesh. Its lightweight material will maintain the openness of the land and is therefore considered to be acceptable. A condition will be attached ensuring the fencing is installed in accordance with the details provided.

7.3.9 *Floodlights:*

7.3.10 In terms of the physical impact of the design of the floodlights, 6, 18m high lighting columns are proposed around the proposed pitch. They are

considered to be relatively innocuous to the openness of the MOL given the minimal nature of each installation in views across the MOL.

7.4 Residential Amenity – Acceptable

7.4.2 Policies 6 and 37 of the Bromley Local Plan seek to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.

7.4.3 The proposal would not change the use of the land which would continue to be a sports pitch/court and it would not change its location. As such the use and the proximity to neighbouring properties would remain the same as the existing situation, however the use would be intensified.

7.4.4 Any new development is likely to have an effect on the neighbouring properties within the local area however the main consideration is whether that effect would be acceptable or not. Furthermore, there is no mechanism within the planning system to protect or preserve "views" although the effect of new development on "outlook" is a material planning consideration. The proposed development may be visible from neighbouring properties; from the North along Mottingham Lane and to the South-West in Edward Tyler Road, Alice Thompson Close and Marvles Lane. Notwithstanding this the degree of separation is good; measuring approximately 185m at the closest point, and together with the height and scale of the proposed structures; including the fencing and lighting columns, it is not considered that the development would have a significantly harmful impact on the outlook of neighbouring properties through overbearing effect and it would not result in significantly harmful overshadowing. Given that the proposed surface would be at or close to the existing ground level and would be screened to an extent by existing vegetation it would be unlikely to lead to additional significantly harmful impact on amenity.

7.4.5 The land would continue to be used for sports and recreation; this would inevitably involve a level of noise, and this is to be expected at sites such as schools. Indeed there are existing sports pitches in the form of a MUGA, Rugby, Hockey, Football together with tennis courts to the north of the site and cricket squares around the sports grounds. As such within the site there is already a degree of noise such as the bouncing of balls against the ground surface, voices/calling and whistles and other general sporting sounds. The proposal would differ from the existing situation as it would be introducing an additional Hockey pitch, and it would provide flood lighting allowing the sport to go on later into the evening. The Council's Environmental Health Department confirms that the Applicant's appointed noise and lighting designers have designed the proposal in accordance with Sport England's standards; with regard to the industry standard Base Applicable Techniques (BAT). As such the designers have taken into account the degree of separation between the sports pitch and residential properties, the likely hours of use of the facility and the location of the vehicle entrances and parking

areas (which are individual and different in each case and therefore designed and assessed accordingly on their own merits). The design incorporates relevant mitigation measures including appropriate base/slab ground levels, playing surfaces and fencing materials that absorb noise and vibration and lighting columns with appropriately designed lighting angled down towards the playing surface and away from residential properties. Providing that the development is carried out in accordance with the submitted details; including the associated lighting assessments/reports, there is no objection from the Council's Environmental Health Department. The current proposal would involve the use of the facility by members of the public during the weekdays and weekends and there is no objection from the Council's Environmental Health Department subject to appropriate hours of operation/use and this could be managed through planning condition(s).

- 7.4.6 Third party comments regarding the lighting are noted however the lighting can be focussed towards the playing surface and with very little light spill projecting to the rear of the lighting column itself, as demonstrated in the submitted lighting contour details. The management of appropriate hours of the use of the pitch and the hours of the illumination of the lighting would also assist in preserving neighbouring amenities in respect of lighting effects. It would be appropriate and reasonable to allow a short transition time after the end of the use of the pitch and switching off the lights to allow the pitch to be cleared up and vacated with the benefit of the lighting for health and safety reasons.
- 7.4.7 The pitches and floodlights shall only be used between 0830 hours and 2200 hours on Mondays to Fridays and between 0900 hours and 2100 hours on Saturdays and Sundays.
- 7.4.8 The above operating hours are considered to be reasonable for this current application. Furthermore the nearest residents' rear gardens are located more than 185m away and this is considered to be sufficient distance to not cause undue harm.
- 7.4.9 In respect of the lighting design calculations, these indicate there will be negligible amount of direct spill. Council's Environmental Health officer states that it is likely that residents will be able to see the floodlight glow when illuminated, however this is not of itself considered to result in a significant harmful impact on amenity. On balance the floodlights are similarly considered to be acceptable.
- 7.4.10 On this basis with the use of appropriate planning conditions the proposal, on balance, would not have an unacceptable effect on the residential amenities of neighbouring properties.

7.5 Trees – Acceptable

- 7.5.2 Policy 73 of the Bromley Local Plan states that proposals for new development will be required to take particular account of existing trees on the

site and on adjoining land, which in the interests of visual amenity and/or wildlife habitat, are considered desirable to be retained.

7.5.3 Policy 77 of the Bromley Local Plan states that development proposals will seek to safeguard the quality and character of the local landscape and seek the appropriate restoration and enhancement of the local landscape through the use of planning obligations and conditions.

7.5.4 There will be no impact to trees in respect of the installation of the sports pitches and associated floodlighting and ball stop netting.

7.6 Highways – Acceptable

7.6.2 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The NPPF clearly states that transport issues should be considered from the earliest stage of both plan making and when formulating development proposals and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

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

7.6.4 London Plan and Bromley Local Plan Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Car parking standards within the London Plan and Bromley Local Plan should be used as a basis for assessment.

7.6.5 Concerns have been raised by local residents regarding the potential increase in visitors using the facilities. The agent has provided a Highways Technical Note. This covers the accessibility of the site in terms of vehicular, pedestrian, cycle and public transport. With regards to vehicular access the main access to Eltham College and the sports pitches is located off Grove Park Road. This gives access to the senior school, sports pitches and the Marathon and College car parks. A separate exit-only vehicular access is provided to the north east of the main vehicular access for the vehicles leaving the College car park. Approximately 104 car parking spaces are provided in the Marathon Pavilion car park and Main school car park. The technical note shows the likely number of additional attendees with the proposed development however, given the relatively low number shown no adverse impacts are expected.

7.6.6 As such there is no objection to the proposal from the Council's Highway Department providing that the parking is provided/implemented as stated in the application details and that a more detailed Construction and Environmental Management Plan is submitted and these matters/details could be managed by appropriate planning conditions.

7.7 Ecology - Acceptable

- 7.7.1 The site is located adjacent to a protected Site of Importance for Nature Conservation (SINC) woodland and therefore the application will need to be assessed against Policy 69 of the Bromley Local Plan and London Plan Policy G6 these policies both seek to protect these sites and require development that might affect them to assess the impact and avoid harm. Policy 69 requires community benefit to outweigh harm and this is reflected in G6 which also sets out the mitigation hierarchy and the avoidance of harm.
- 7.7.2 The Site is dominated by amenity grassland (a cricket square and outfield). A band of broadleaved woodland is located to the west of the Site. Given the pitch is by its nature well maintained/manicured and regularly used for sports the potential for the site to support protected or notable species is very limited given the low value of the habitats present.
- 7.7.3 The application is accompanied by an Ecological Appraisal which recognises the key impact being that of light spillage on the woodland edge to the north-west would have on foraging bats. The report recommends a lighting scheme to reduce light spillage as far as possible with the aim to ensure that adjacent woodland areas and the tree line do not increase by more than 1 Lux. The original lighting plan produced by STRI indicates that light spill may already be limited to below 1 Lux in most areas.
- 7.7.4 The report also proposes the installation of bat boxes together with planting of a native hedgerow along one length of the proposed artificial turf pitch, or native scrub planting adjacent to existing woodland or trees at the edge of the sports field to create a graded habitat for a variety of species. It is therefore recommended that these measures are secured by condition if planning permission is forthcoming.
- 7.7.5 It is acknowledged that the area could potentially offer commuting and/or foraging space for wildlife. Although the proposed development (particularly the fences) would be likely to prevent access on parts of the land it would nonetheless not remove the grass in its entirety across the school site and the site overall would continue to provide commuting and foraging routes.
- 7.7.6 Concerns have been raised regarding the ecological information provided and the impact on the neighbouring woodland, bird, as well as bats. It is considered that the development is less likely to affect birds and the woodland area itself is not proposed to be directly affected. The woodland edge will be affected, however the impact here is more relevant to bats, as most bird species are active in daytime when the floodlighting will not be used. A floodlighting condition is therefore recommended which will prevent significant light spillage and as such the woodland edge will not be greatly affected.
- 7.7.7 In terms of an acoustic/sound survey a specific survey would not normally be required given that the site is already in use for sport. In addition, concerns have been raised over the submission of a cumulative floodlighting report

taking into account the existing floodlighting on site however it is necessary to consider the information provided and every application on its own merits.

7.8 Drainage

7.8.1 It is noted that the proposal is intended to improve the playing surface in order that it can be utilised more consistently throughout the majority of the year and as such it would typically involve the use of drainage channels and a number of draining surface layers. Nonetheless the Council's Drainage Engineer recommends the provision of a sustainable surface water drainage strategy to assist in water retention and to reduce flood risk and this could be managed by planning condition.

8 CONCLUSION

8.1 Overall, it is considered that the proposed scheme is acceptable in terms of its design, height and scale, and would preserve the character and appearance of the area, would not have any detrimental impact on local ecology. The proposal would not result in a loss of amenity or privacy to the occupants of properties in the vicinity. There are no fundamental objections from a highway point of view.

8.2 With regard to the impact of the development on the MOL, it is considered that the proposed new astro turf hockey pitch, hockey training area and associated floodlighting which would support the existing function of the essential outdoor sport and recreation facility has been sensitively sited within the site and relatively modest in scale. Whilst there will be some fencing and associated floodlighting and works in the MOL, given that it is supporting the existing function on site it is considered that the proposal would not conflict with the purposes of including land within the MOL and together with the temporary nature of the development it is considered that the proposal will not be detrimental to the MOL.

8.3 Background papers referred to during production of this report comprise all correspondence on the files set out in the Planning History section above, excluding exempt information.

RECOMMENDATION: Application Permitted

As amended by documents received on 30/08/2019, 21/10/2019, 23/10/2019, 11/09/2020 and 19/04/2021.

Subject to the following conditions:

1. Standard time limit of 3 years

2. The artificial pitch hereby permitted shall not be constructed other than in accordance with the design and layout details set out in the planning application.

3. Materials for the development shall be as set out in the application documents

4. Specific Ecological enhancements

5. Clearance of site outside of nesting season

6. Lighting details

7. Hours of use and associated sports lighting - 0830 hours and 2200 hours on Mondays to Fridays and between 0900 hours and 2100 hours on Saturdays and Sundays.

8. Management Plan

9. Construction Management Plan

Any other planning condition(s) considered necessary by the Assistant Director of Planning.

Informatives:

The applicant is advised that the design and layout of the [sports facility] should comply with the relevant industry Technical Design Guidance, including guidance published by Sport England, National Governing Bodies for Sport. Particular attention is drawn to: Sport England - Artificial Surfaces for Outdoor Sports