

PART A

Report to: **Development Management Section Head**

Date of Committee:	7 August 2014
Site address:	Colne River Park, Radlett Road Playing Fields, Radlett Road
Reference Number :	14/00731/FULM
Description of Development:	Re-grading/levelling of the existing sports field, filling in of pot holes and undulations and the introduction of new land drainage to provide a high quality playing surface with an approximate 1:60 cross-fall across the line of play. Includes the erection of a single storey building with a single pitched roof for changing rooms/facilities, car parking and treatment for Japanese Knotweed (AMENDED DOCUMENTS)
Applicant	Watford Borough Council
Date Received:	22nd May 2014
8 week date (minor):	21st August 2014
Ward:	CENTRAL

SUMMARY

The proposal relates to Radlett Road Playing Fields which cover an area of about 7 hectares. The playing field currently has an undulating surface and on occasion is water-logged, thereby prohibiting its effective use as a playing field. The site also includes a

rather unsightly concrete slab on its north west boundary where there once was a motor repair garage and associated parking. The playing field is laid to grass; however, there are trees and other vegetation around the perimeter the site, with part of the site suffering from an invasion of Japanese Knotweed.

The proposal is to level the site, provide drainage to allow the ground to be used for sports purposes, including hurling and Gaelic football games. The proposal will also include the removal of the concrete slab and the erection of single storey building to provide a changing facility and a meeting room. The proposal provides parking spaces on permeable ground and includes associated landscaping. It also includes the treatment of the Japanese Knotweed.

The rainwater from the playing field will be drained by providing drainage beneath the playing field. The drained water will be collected on the west side of the playing field and will then be stored in a depression on the north side of the playing field before it is gradually released into River Colne. The intention is to attenuate the rate of release of excess water into the river to reduce the rate of discharge of water into the river during the heavy downpours. It is considered that the proposal will improve the drainage system without any increase in the risk of local flooding.

The playing field will be located well away from the residential buildings and at a safe distance from the park boundary. Given its distance from the residential dwelling it is considered that the proposal will have no significant impact upon the amenities of the local residents.

A detailed assessment has been carried out with respect to the likely generation of traffic and the impact upon parking conditions within the locality. The analysis indicates that the proposal will have no impact upon the free and safe flow of traffic on the local highways and an acceptable impact upon parking conditions.

The use of the land is recognised to be an appropriate form of development in the Green Belt and, given the small scale of development proposed on previously developed land, overall it is considered that the proposals maintain the openness of the Green Belt.

The National Planning Policy Framework (NPPF) advises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The NPPF further emphasises that “access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.” The proposal will provide such facilities and is therefore in accordance with Central Government planning policy.

Accordingly, the Development Management Section Head recommends that planning permission be granted, subject to appropriate conditions as set out in the report.

BACKGROUND

Site and Surroundings

The proposal relates to Radlett Road Playing Fields which cover an area of about 7 hectares. The site is generally laid out as grass area and until a few years ago contained two football pitches plus an informal kick-about area.

The site is bounded by West Coast Mainline Rail tracks to the south west, by the Link Road to the north and Radlett Road to the west. The River Colne forms the eastern boundary to the site. Further west is a residential development accessed via Raphael Drive off Radlett Road. North of the site is a private residential car park and residential dwellings accessed from Radlett Road before the Link Road and the allotments which lie further north.

The access to the playing field is from Radlett Road. There is a hard surfaced area towards the southern end of Radlett Road which is intended to allow maintenance

vehicles to pull off the highway before accessing the playing fields through a lockable vehicle barrier. In addition the land in the northwest corner of the site is currently covered by a concrete slab. There is a vehicular access to this concrete slab but it is currently blocked by bollards. This area was formerly occupied by a garage. It appears that the garage was demolished to give way to a changing room facility for a football club. However, whilst the buildings were demolished the changing rooms were not erected.

It appears that the land and the field suffers from flooding. There is a swale down the western edge of the west and south side of the field which runs into the River Colne.

There is also a small play facility area towards the south west corner of the site. It comprises a hard surface, fencing around the play area and two basketball boards. This play area provides an all-weather surface that can be used for a range of sports and by a variety of users. Given its all-weather surface it can be used in most weather conditions. This has recently been provided and has proved to be very popular.

The nearest public car park (known locally as Timberlake) is located beyond the allotments about half a kilometre away. This car park has 45 marked bays. The immediate area is generally residential but further north there is a significant commercial area.

The playing field is grassed. However, on its perimeter towards the south west corner and along the boundary with Radlett road, mature and semi-mature trees provide more varied landscaping. As well as the playing field, the area also contains a youth shelter – a steel construction on the western side of the site adjacent to Radlett Road.

A hard surfaced footway and cycle route runs on the eastern edge of the site on the raised ground adjacent to the river. This is designated as a National Cycle Route.

The area of the playing field is at a raised level, having been previously a landfill site. However, as a playing surface, its condition is far from ideal and it has fallen into disuse over a number of years, due its to dangerous and unsafe state. The field also suffers from

an invasion of Japanese Knotweed. Given its previous use as a landfill site, there is some potential for land contamination.

The playing field is also a designated open space, wildlife corridor and is within the Green Belt in the Watford District Plan 2000 and is part of network of green spaces which run across the Borough boundary into Hertsmere.

Proposed development

Full planning permission is sought for the following:

- re-grading and levelling of the existing sports field;
- the provision of drainage and the associated attenuation measures to curb the flow of the discharge of flood water into River Colne;
- the total removal of the exiting concrete slab and the erection of a single storey building with floor space of 300m²;
- the provision of associated parking spaces to include 13 standard spaces, 3 minibus spaces and 2 disabled bays;
- a new access to the site.

Access to the car park and changing block will be taken from a point approximately 15m south of the existing chicane in the road.

Planning history

On 6 June 2012 planning permission 12/00317/FUL was granted for a Multi Use Games Area (MUGA) on the playing field towards the south west corner of the playing field. The MUGA measure 31m by 39m and is surrounded by weld mesh fencing. The MUGA is located within 75m from the park boundary and is accessed by a 1.5m wide pathway.

This play area is managed and maintained by Watford Borough Council. The Park Ranger Services carry out regular inspections of the facility in line with the established inspection frequency of other facilities in the Borough. This is supplemented by additional inspections by the Watford Community Housing Trust Estates Officer. Young people are supported by

the project partners which form a group and help to ensure the facility is appropriately used and in part maintained by users. This is a process that has been successful at other sport venues in the Borough. The MUGA is well used and the Hertfordshire Constabulary has commented positively in relation to the operation of this particular sport facility.

On 7 February 2014 a planning application (14/00191/FULM) was submitted to the Council seeking a development comprising the levelling and regrading of the playing field. However, the Environment Agency objected to the scheme on the grounds that a proper flood risk assessment has not taken place. Consequently the application was withdrawn on 14 May 2014.

Relevant Policies

National Planning Policy Framework

- Section 7 Requiring good design
- Section 8 Promoting healthy communities
- Section 11 Conserving and enhancing the natural environment

Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026

No relevant policies.

Hertfordshire Minerals Local Plan (saved policies)

No relevant policies.

Watford Local Plan Core Strategy 2006 - 31

- Policy SS1 Spatial Strategy
- Policy SD1 Sustainable Design
- Policy SD2 Water
- Policy SD3 Climate Change
- Policy T2 Location of New Development

Policy T3	Improving Accessibility
Policy T4	Transport Assessments
TLC2	location of facilities
Policy UD1	Delivering High Quality Design
Policy GI1	Green Infrastructure
Policy GI2	Green Belt
Policy GI3	Biodiversity
Policy GI4	Sport and Recreation

Watford District Plan 2000

Policy SE7	Waste Storage, Recovery and Recycling
Policy SE22	Noise
Policy SE23	Light Pollution
Policy SE24	Unstable and Contaminated Land
Policy SE27	Flood Prevention
Policy SE36	Replacement Trees and Hedgerows
Policy SE37	Protection of Trees, Woodlands and Hedgerows
Policy SE39	Tree and Hedgerow Provision in New Development
Policy T9	Cycling
Policy T10	Cycle Parking Standards
Policy T21	Access and Servicing
Policy T22	Car Parking Standards
Policy H15	Non-residential Proposals in Residential Areas

CONSULTATIONS

Neighbour notifications

Letters were sent to 940 properties in Radlett Road, Eastfield Avenue, Pankhurst Place, Orwell Court, Mandela Place, Brocklesbury Close. A total of 24 objections have been received, citing the following objections:

- There is an increased risk of flooding;
- The land will be lost and walking dogs will be restricted;
- Risk of injury from fast balls;
- Changing rooms becoming a social club;
- Traffic and parking problem will be aggravated;
- Danger from pollution;
- Families will be deprived of having a picnic;
- There will be too many structures on the field against the character of the Green Belt;
- Misleading information - one application was withdrawn and a similar one was submitted after the election and hurling was not mentioned in the application;
- This is a done deal and already an agreement has been reached to approve scheme, as already publicised in an article widely distributed.

Site notices

Four site notices were displayed around and within the site. In addition, a number of meetings have been held with local residents.

The Committee will be advised of any additional representations received after the date this report was written.

Consultations

Environment Agency

Planning permission could be granted to the proposed development as submitted if the following planning conditions are included as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application. I have provided further comments below our conditions on other concerns.

Condition one

No development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the local planning authority), shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A preliminary risk assessment which has identified:
 - i. all previous uses
 - ii. potential contaminants associated with those uses
 - iii. a conceptual model of the site indicating sources, pathways and receptors
 - iv. potentially unacceptable risks arising from contamination at the site.
- 2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- 4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To protect groundwater. We do not agree with the conclusions in the Geo-environmental report dated September 2013 that there are no unacceptable risks to groundwater. The scope of the site investigation did not include adequate groundwater investigation as monitoring boreholes that penetrate the groundwater table were not included. The deepest boreholes were only installed to five metres deep. Boreholes

installed for the investigations for the M1 link road on the eastern boundary of the site intercepted groundwater around 46 – 47.5 metres above Ordnance Datum (AOD), equating to approximately eight to nine metres below ground level. Borehole logs from the M1 link road suggest that the glacial gravels are underlain by the Principal Chalk aquifer (with the top of the chalk at around 50 m AOD).

Therefore the conceptual site model is incomplete and the risk to groundwater needs to be quantified as the proposed development is located within a Source Protection Zone 1 and Source Protection Zone 2 for Bushey Hall Public Water Supply and adjacent to the River Colne. The earthworks may cause further deterioration in quality in the adjacent River Colne and groundwater. The proposed development may require deep foundations. The piling risk assessment is based on the conceptual site model which is currently incomplete for the site. National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

This is in line with your Core Strategy policy SD1 which advocates sustainable design, including the facilitation of remediation of contaminated land and minimising adverse effects on water quality.

The Detailed Quantitative Risk Assessment and Remedial Strategy appear to be written for human health objectives. Your Environmental Health/Contaminated Land Officer at Watford Council will need to comment on these.

Condition two

No occupation shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the

remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: to protect groundwater in line with your Core Strategy policy SD1. The verification report should be undertaken in accordance our guidance Verification of Remediation of Land Contamination <http://publications.environment-agency.gov.uk/pdf/SCHO0210BRXF-e-e.pdf>

Condition three

No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local planning authority, shall be submitted to and approved in writing by the Local planning authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local planning authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local planning authority.

Reason: to protect groundwater.

The scope of the site investigation report September 2013 did not include groundwater monitoring boreholes that penetrate the groundwater table. The earthworks may cause further deterioration in quality in the adjacent River Colne and groundwater.

Condition four

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: to protect groundwater. This is in line with the advice in the National Planning Policy Guidance for land affected by contamination. No investigation can fully characterise a site. The Preliminary Risk Assessment/desk study indicates the proposed development is located on a landfill that accepted waste before the Waste Management Regulations 1994 and there may be potential issues from historical activities at the site.

Condition five

The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul and surface water has been submitted to, and approved in writing by, the local planning authority. The scheme must show that roof drainage is sealed at ground level. The scheme shall be implemented as approved.

Reason: to protect groundwater. The proposed development is located on a historical landfill, and previous use as a service station may have led to contamination in the ground. No infiltration of surface water drainage into the ground at this site is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to nearby rivers and groundwater.

This is in line with your Core Strategy policy SD2 to ensure all new developments incorporate sustainable drainage facilities and techniques as appropriate. *Groundwater protection: Principles and practice* (GP3) details our position on land affected by contamination. In particular, position statements *G4 - Trade effluent and other discharges*

inside SPZ1; G11 - Discharges from areas subject to contamination and G12 - Discharge of clean roof water to ground are of relevance. The discharge of clean roof water to ground is acceptable both within and outside SPZ1 provided that all roof water down-pipes are sealed against pollutants entering the system from surface run-off, effluent disposal or other forms of discharge. The method of discharge must not create new pathways for pollutants to groundwater or mobilise contaminants already in the ground.

The Thames river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. Without this condition, the impact may result in failure to meet these objectives for the Chalk groundwater bodies because it would result in the release of priority hazardous substances Hydrocarbons and mecoprop and non-hazardous pollutants Ammonia and Chloride from the former landfill.

Condition six

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To protect groundwater from pollution via remobilisation of contaminants in soil and/or preferential pathways for contaminant migration.

Condition seven

No development will commence until a detailed method statement for removing and the long-term management/control of Japanese Knotweed on the site has been submitted to and approved in writing by the local planning authority. The method statement shall include proposed measures that will be used to prevent the spread of Japanese Knotweed during any operations. Development shall proceed in accordance with the approved method statement.

Reason: This condition is necessary to prevent the spread of Japanese Knotweed which is an invasive species found throughout this site. Without it, avoidable damage could be caused to the nature conservation value of the site contrary to national planning policy as set out in the National Planning Policy Framework paragraph 109. This requires the planning system to aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. The applicant has proposed to remove some areas of Japanese Knotweed. They will need to demonstrate how they will manage all of the Japanese Knotweed on the site in an effort to eradicate it. Your Core Strategy policy GI2 seeks the restoration of habitats and enhancement where possible.

Advice to local planning authority

There is an ordinary watercourse that runs alongside Radlett Road before it forms what is called 'the swale' throughout the proposal documents. This ordinary watercourse is not acknowledged in the submitted documentation and it appears that the access road will go over the top of it. Surface water flood risk is a concern in this area. Although we are satisfied that the flood risk assessment submitted with this planning application (Report No KO472/1 (Rev 0.2) dated May 2014) does satisfactorily address flood risk, it does not have any information on the ordinary watercourse. This proposal should be discussed with Hertfordshire County Council who will need to agree to any proposals that involve works to an ordinary watercourse. They may have conditions in relation to any culverting or bridges. We don't support culverting of any watercourse and suggest that wherever possible open span bridges should be utilised. We support the recommendation in the flood risk assessment (FRA) that a plan for the management and maintenance of existing culverts on site is agreed. This would need to include any new culverts.

We normally request mitigation or compensation where watercourses are impacted by development. In this case there could be habitat mitigation on site by providing areas of native planting. It is disappointing that the planting scheme in the landscape strategy doesn't include any native shrubs or trees. This should be amended to provide valuable habitat for our native wildlife.

The development should be carried out in accordance with the FRA and associated plans. The FRA outlines a surface water drainage strategy that should ensure that greenfield run off rates are achieved from this development. It is important that the attenuation elements of drainage strategy are in place before construction commences so that there is no increase in flood risk during the construction phase.

Advice to applicant

We recommend that developers follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination. They should refer to the Environment Agency Guiding Principles for Land Contamination for the type of information that we require in order to assess risks to controlled waters from the site. We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by land contamination. British Standards when investigating potentially contaminated sites and groundwater, and references within these documents include: *BS 5930: 1999 A2:2010 Code of practice for site investigations*; *BS 10175:2011 Code of practice for investigation of potentially contaminated sites*; *BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points*; *BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters* (a minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality). Use MCERTS accredited methods for testing contaminated soils at the site.

A Detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out. In the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment. GP3 version provides further guidance on setting compliance points in DQRAs.

Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50 metres.

Following the DQRA, a Remediation Options Appraisal is required to determine the Remediation Strategy in accordance with CRL11. The verification plan should include proposals for a groundwater-monitoring programme to encompass regular monitoring for a period before, during and after ground works (for example monthly monitoring before, during and for at least the first quarter after completion of ground works, and then quarterly for the remaining 9-month period).

It does not appear that there will be importation of material for the ground raising. A permit may be required for any importation of materials or waste to the site. It will not be acceptable to import waste into areas of SPZ1.

Please contact the Sustainable Places team if you require any further information or clarification.

Hertfordshire County Council (Highway Authority)

The County Council (HCC) as the Highway Authority considers that the development is unlikely to result in a material increase of traffic in the vicinity of the site and therefore has no objections to the principle of the development, subject to the conditions detailed as below:

Conditions

1. The development shall not be occupied until the parking and turning areas have been constructed, surfaced and permanently marked out as identified on drawing number 007. The car parking areas so provided shall be maintained as a permanent ancillary to the development and shall be used for no other purpose at any time.

Reason: To ensure that adequate parking is provided at all times so that the development does not prejudice the free flow of traffic or the conditions of general safety along the adjacent highway.

2. The applicant should provide adequate provision for a Pick up and Drop off area within the curtilage of the club in order that vehicles can undertake such movements off the public highway.

Reason: In the interest of highway safety and amenity.

3. Prior to the commencement of the site works, details of on-site parking for all contractors, sub-contractors, visitors and delivery vehicles shall be approved in writing by the Local Planning Authority in conjunction with the Highway Authority and that area shall be maintained available for use at all times during the period of site works.

Reason: To minimise danger, obstruction and inconvenience to users of the highway.

4. Not to occupy the development or cause or permit First Use until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority/Highway Authority. No part of the Development shall be occupied unless any measures scheduled by the Travel Plan to be implemented before such occupation have been enacted. The Travel Plan should include a Car Parking Management Plan which should detail the operation of the club car park.

Reason: To promote sustainable transport measures to the development and in the interest of highway safety and amenity.

COMMENTS

The proposal is to relocate the Glen Rovers Club from Oxhey Park to Radlett Road Playing Fields. This will be achieved by the provision of a new hurling pitch and an associated changing block building to create facilities for regional standard hurling fixtures and training. Radlett Road is a classified C road with a speed limit of 30mph.

TRAFFIC GENERATION

An Addendum to the Transport Statement dated June 2014 provides the details of traffic generation. The statement provides the Glen Rovers Hurling and Football club existing trip generation figures and indicates that around 25-30 adults and 45-55 children attend the training sections (the Tuesday training period is between 6:45pm-8:45pm). It shows that approximately 14 cars with a further 17 drop off and pickup trips are associated with the existing site at the aforementioned time.

An estimate has been made of the vehicular trip generation at the proposed site. The Transport Statement notes that during the busiest training evenings (Tuesday's) the proposed site will generate approximately 31 vehicular trips, of which 17 will be dropping off/picking up. On match days, there will be approximately 30 vehicular trips.

Depending on how well the club performs in competitions, there could be one or two key matches in a season which might attract up to 100 people with around 50-55 vehicles. Taking into account that the proposed site is operating on weekday evenings (from 6:45pm to 8:45pm) and weekends (Saturday 10:30am-11:30pm and on match days Saturdays 2:30pm-3:30pm; Sunday match days from 3:00pm-4:00pm), the forecast traffic generation of the site is not considered to have a material impact on the local highway network as these times fall outside of the network peak hours.

ACCESS

To access the proposed club and changing block, a new access will be located approximately 15 m south of the northernmost pedestrian crossing build-out. The proposed access is considered acceptable by the Highway Authority.

VISIBILITY

Vehicle to vehicle inter-visibility and pedestrian visibility is acceptable and complies with levels of visibility contained in Manual for Streets [Visibility splays at junctions 7.7 and visibility along the street edge 7.8.3.]. The Highway Authority has no objections to the proposed access.

PARKING

Paragraph 4.3 of the Transport Statement states that there will be 18 car parking spaces including two disabled parking bays and three mini-bus bays serving the proposed hurling pitch. The parking provision is considered acceptable for the training sessions on weekday evenings. However, 18 car parking spaces is considered to be an insufficient provision on match days; a lack of parking provision on the site would put additional pressure on the limited existing on-street parking. Watford Borough Council should decide whether there is sufficient off street parking for the club. Nevertheless, a public car park known as “Timberlake” car park (50 car spaces) is located 500m from the site.

CAR PARK LAYOUT

The vehicles serving the club are considered to be mainly cars and a small number of minibuses. There is a sufficient area within the site for cars to turn around but a limited turning area for a minibus; such vehicles would have to make multiple manoeuvres within the car park.

HIGHWAY LAYOUT

The Transport Statement does not consider a Pick up and Drop off area for the proposed site. This creates a potential issue as there is no on-street parking provided with the vicinity of the club; as such, parents may instead choose to alight temporarily on the double-yellow lines outside the site. The Transport Statement does not adequately address this issue and the applicant should provide a Travel Plan which should include a Car Parking Management Plan detailing the operation of the car park on match days. The

Highway Authority considers that the applicant should also address the issue of providing a pick up and drop off area off the public highway.

ACCESSIBILITY

The proposed site lies within easy reach of bus routes and within 3 km of the local railway station. There are footways and street lighting on both sides of Radlett Road.

INFORMATIVE

The Highway Authority requires the alterations to or the construction of the vehicle crossover to be undertaken such that the works are carried out to their specification and by a contractor who is authorised to work in the public highway. The applicant may need to apply to Highways (Telephone 0300 1234047) to arrange this or use link:-

<http://www.hertsdirect.org/services/transtreets/highways/honlineservices/vxo/>

Note:- should there be any obstructions on the public highway, footpath, grass verge, i.e. trees, posted signs, TG pole, lamp columns, drainage gulleys etc, then permission for removal and/or repositioning will need to be gained before work can commence on site. The applicant will need to be aware that they will/may be required to fund this work.

CONCLUSION

Hertfordshire County Council as Highway Authority has considered the proposals to relocate the Glen Rover Club from Oxhey Park to Radlett Road. We consider that the proposal would not significantly increase the traffic generation to the area and have a material impact on the safety and operation of the adjoining highway. The Highway Authority has no objections on highway grounds with the inclusion of the above planning conditions and informative.

Environmental Health

No objections.

Land Contamination Officer

Has received the following reports submitted in support of the following planning application:

- Geo-Environmental Assessment; Document Ref: 20407R1; Issue A; WDE Consulting Limited; September 2013
- Remedial Strategy; Document Ref: 20407R1; Issue A; WDE Consulting Limited; January 2014

The Geo-Environmental Assessment provides a sufficient preliminary risk assessment of the site and the intrusive investigation provides adequate site coverage for human health purposes. In principal, I have no objection to the re-use of site-won material in the cut and fill works.

In respect of the ground gas monitoring programme, the monitoring undertaken so far (2no. rounds) is insufficient to accurately characterise the current ground gas regime at the site. The monitoring programme should be designed and undertaken in accordance with current published guidance, which recommends a minimum of 6no. rounds over a period of 3no. months. Further monitoring will be required.

In general, I am in agreement that the remedial measures proposed will be suitably protective of human health. A full review of the Remedial Strategy has not been undertaken as further site characterisation (ground gas monitoring) is required. It is essential that the cut and fill works are effectively managed to ensure that all significant pollutant linkages are broken; detailed documented evidence (photographic, laboratory results etc.) will be required to demonstrate this. Validation sampling of the cover system must be undertaken in accordance with Watford Borough Council's guidance document.

I recommend that the standard contamination condition be applied should planning permission be granted to ensure the additional works are undertaken. The Remedial Strategy should be amended accordingly following the additional investigative works.

Sport England

It is understood that the site forms part of or constitutes a playing field as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No. 2184), in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more, or that it is on land that is allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement.

The consultation is therefore statutory and Sport England has considered the application in the light of its playing fields policy a copy of which can be downloaded from our website at www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/ The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area. The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. The policy states that:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies.”

Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities.

Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country.

The proposal involves re-grading part of Radlett Road Playing Fields and introducing a new drainage system to create a high quality playing surface together with supporting changing/storage facilities and car parking. Sport England was consulted on a previous planning application (Ref: 14/00191/FULM) involving just the re-grading of the playing fields earlier in 2014 that was subsequently withdrawn. The main difference between the applications is the provision of the ancillary changing/storage pavilion and car parking. I consider that Exception E5 of Sport England's playing fields policy would be the most applicable to the proposal:

“The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.”

Radlett Road Playing Fields was a former landfill site which ceased landfill use in 1985. While it has been used since then for football pitches, the quality of the site as a playing field has been significantly affected by the surface levels and poor drainage which has restricted the carrying capacity and made it unattractive to potential pitch users. Consequently, there have now been no pitches marked out on the site due to the surface quality for a few years. The proposed scheme involves re-levelling the playing field to address the unsuitable gradients and installing a pipe drainage system to address the drainage problems as well as addressing localised surface quality constraints such as undulations and pot holes.

It is intended that the improved area of the playing field would be used as a hurling pitch by Glen Rovers GAA Club and that the associated changing and car parking facilities would support the club's use of the enhanced playing field. The club are currently based at Wigenhall Road Recreation Ground (Oxhey Park) which is shortly to be developed for a new link road (Planning Permission (13/00971/FULM)) to support the Watford Health Campus scheme. This will necessitate the relocation of the club and Radlett Road Playing Fields has been identified as a suitable site for the club's pitches and ancillary facilities to be relocated to. Condition 26 of the planning permission referenced above requires no

construction of the link road to commence until details of a permanent replacement hurling pitch and changing facility provision have been submitted and approved. The proposal would therefore allow this planning condition to be addressed.

A detailed technical specification for the proposed ground works for improving the playing fields has been provided which would appear to address all of the relevant issues that require consideration when addressing a major playing field renovation project such as this. While Sport England would usually have expected an agronomist's (sports turf consultant) feasibility study to have been prepared to inform a specification for major playing field ground works, on this occasion as the playing field surface is to be stripped and the specification is sufficiently detailed it would not be considered essential.

The proposed works would represent a significant investment into the site which would facilitate major improvements that would be expected to address the existing deficiencies and create a suitable quality hurling pitch to allow Glen Rovers GAA Club to relocate. The Watford Sports Facility Strategy (2012) identified deficiencies on this site and referred to the site's potential for accommodating pitches displaced from Wigganhall Road Recreation Ground so the proposal would be consistent with the strategy. As the playing fields are not currently marked out for pitches, the development would have no impact on the existing use of the playing field on either a temporary or permanent basis.

The proposed pavilion and car park would provide modern changing and associated facilities for use by Glen Rovers GAA Club which are required to facilitate the club's relocation to the site as the ancillary facilities are essential to support the club's use of the enhanced playing field. The proposed facilities would be provided to modern standards and would be expected to be superior in quality to the club's existing facilities at Oxhey Park. The pavilion and car parking would be sited on disused land to the north west of the playing field that was formerly occupied by buildings and would therefore not have an adverse impact on the playing field itself.

On the basis of the above assessment, I consider that the potential sports development benefits that the proposed qualitative improvement works to the playing field would offer would clearly outweigh the detriment caused by the impact on the playing field which I consider would meet exception E5 of our playing fields policy. The proposed pavilion and car park would provide essential ancillary facilities to support the use of the playing field by the hurling club which would accord with exception E2 of our policy. This being the case, Sport England does not wish to raise an objection to this application.

Support is also offered for the principle of the development as a non-statutory consultee due to the sport related benefits associated with delivering the proposed improvements and bringing the site back into use for formal sport. If approved, I also consider that the delivery of the project would address the requirements of condition 26 of planning permission 13/00971/FULM in terms of providing satisfactory details of a permanent replacement hurling pitch and changing facilities for mitigating the loss of the existing facilities at Wiggshall Road Recreation Ground.

If the design and layout of the proposed changing pavilion is material to the determination of the planning application, Sport England's design guidance in our Pavilions and Clubhouses guidance note may be of assistance and can be downloaded from Sport England's website at www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/pavilions-and-clubhouses/. Based on a brief assessment, the proposed layout of the building is considered to broadly accord with this guidance.

The absence of an objection to this application in the context of the Town and Country Planning Acts, does not in any way commit Sport England's or any National Governing Body of Sport's support for any related application for grant funding.

Arboricultural Officer

I have no major objections to the proposals: the tree losses indicated are minimal and the proposed new landscaping will compensate for these losses. Details of tree and ground

protection where the proposed route of construction traffic passes close to retained trees should be submitted and approved. The proposed landscaping is considered acceptable.

Planning Policy

This land is a former landfill site and the site of the proposed new changing rooms is a brownfield location, which was previously a garage. We have no objection to the proposed landscape works, although clearly it would be more advantageous if all the Japanese Knotweed was to be removed from the site. The proposed new building is of unremarkable design, but is a simple and functional building that will have a neutral impact on the character of the area.

Hertfordshire Constabulary (Crime Prevention Design Advisor)

I have had a look at the application and consulted local colleagues over any issues with ASB either in the park or the new MUGA; in fact the MUGA has proved very successful in the area.

I have a few comments on the proposed building:

- All the doors must be to LPS1175 SR2 standards at minimum and any glazing in or around the doors must have laminated glass conforming to the requirements of BS EN356:2000 class P1A.
- The brickwork must be graffiti proof.
- The roof lights must be certified to LPS1175 SR1 and as they are easily accessible must have laminated glass conforming to the requirements of BS EN356:2000 class P1A
- There is no indication of security of valuable within the changing rooms, nor where valuables might be place whilst the players are away from the dressing rooms.
- Similarly there must be the facility for the keys to all doors to be held within the clubhouse during games.

I would like to have external security shutters on all doors so as to prevent any means of forced access, but I am unable to justify on the grounds of criminality in the local area. I am not even sure there is a need for an alarm system.

Thames Water

Waste comments

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the options available at this site.

Surface water drainage

With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Water comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

APPRAISAL

In accordance with s.38 of the Planning and Compulsory Purchase Act 2004, the Development Plan for Watford comprises:

- (a) the *Watford Local Plan Part 1 - Core Strategy 2006-31*;
- (b) the continuing “saved” policies of the *Watford District Plan 2000*;
- (c) the *Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026*; and
- (d) the *Hertfordshire Minerals Local Plan Review 2002-2016*.

The East of England Plan 2008 and the “saved” policies of the Hertfordshire Structure Plan 1991-2011 were revoked on 3rd January 2013.

Planning considerations

The issues to be considered are:

- whether the proposal will be an appropriate form of development in Green Belt and whether it would harm the openness of the designated open space;
- whether the proposal will detract from the recreational and sport opportunity offered by the recreation ground;
- whether the proposal will have detrimental impact on the designated wild life corridor or the trees;
- whether the proposal will have an adverse impact on the amenities of local residents, in terms of noise, other activities associated with a playing field;
- whether the proposal will result in undue risk to the users of the park including the passers-by, dog walkers and spectators;
- whether the proposal will increase the risk of flooding in the area;
- whether the proposal will have an adverse impact on the human health or water pollution;
- whether the proposal will have an adverse impact on parking conditions and the local highway network.

Impact on the Green Belt and the open character of the recreation ground

One of the major issue to be considered here is the impact of the proposed development upon the openness of the Green Belt. The significant policy advice in this regard is provided in the NPPF, which adopts a similar stance to its predecessor advice (Planning Policy Statement 2) and explains that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”. It is also emphasised that “the Government attaches great importance to Green Belts”. At paragraph 80, the NPPF makes it clear that the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF further advises that a local planning authority should regard the construction of new buildings as inappropriate development in a Green Belt. One of the exceptions to this general rule allows for the provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

The Council’s policies in relation to development in the Green Belt state that the Council will:

- maintain the general extent of the metropolitan Green Belt in the borough;
- encourage appropriate positive use of the Green Belt and measures to improve the environmental quality;
- make minor revisions, to correct existing anomalies and create defensible green belt boundaries in the site allocations document and accompanying proposals map.

There will be a general presumption against inappropriate development in the Green Belt. Exceptions to this are as defined in paragraphs 89-91 of the NPPF.

The above policy analysis indicates that there is no conflict between the NPPF and Borough Plan policies and both sets of policies allow only certain types of development to take place in a Green Belt location. In particular both sets of policies encourage development of sport facilities.

The proposed development is primarily for the levelling and appropriate drainage of the existing playing field and the provision of new changing rooms associated with them. The proposal will result in the bringing back into use of the playing field which has fallen out of use due to significant deterioration of the facility.

The proposal includes the erection of a new building to be used for changing room facilities. The proposed building will be able to house a hurling and Gaelic football club. This has been necessitated due to the relocation of the existing facilities which are to be demolished to allow for the construction of the link road to the Health Campus. The proposed building will be built on a previously developed land within the green belt. The existing concrete slab is to be removed and replaced by permeable surface to include landscaping and associated car parking spaces.

Whilst the proposed building will be visible from the road, given its location out side the playing field it will not have a significant impact on the openness of the Green Belt. The proposed design which incorporates a mono-pitch roof design is considered to be acceptable in the streetscape. It is considered that it will enhance the character of the area without having a visually unacceptable impact on the openness of the Green Belt.

Core Strategy Policy GI4 explains that the Council will work in partnership with local sport organisation to increase physical activity and sport to contribute towards a healthy town for Watford residents. Recent case law (*Fordent Holdings Ltd v Secretary of State for*

Communities and Local Government & Another [2013] EWHC 2844 (Admin) (26 September 2013)) has established that special policies for the promotion of a particular purpose within a plan could amount to the special circumstances necessary for allowing development in a Green Belt.

In the present case it is considered that the very special circumstances do exist which would justify this development being permitted in the Green Belt. It is also considered that appropriate measures, in terms of the location and the design of the building, have been incorporated to minimise the impact of the development on the openness of the Green Belt.

The proposal is considered to be in line with the NPPF which considers the provision of sports facilities to be an appropriate form of development in the Green Belt. The proposal will also comply with the Council's policies which in principle allow development proposals which are essentially required to enable existing facilities for outdoor sport and recreation within the Green Belt to be upgraded to meet modern requirements.

Accordingly, the proposal will comply with both the local policies and the national planning advice as set out in the NPPF.

The proposed building has designed for changing room facilities including a meeting room. The building has been designed specifically in accordance with the Sport England's design standards. However, there is concern that the building may be used for recreational use. Whilst the proposed building's physical constraints will prevent its use as a social club, a condition is recommended to ensure that the changing room facilities would not be used for social or entertainment purposes.

Impact on sport and recreation opportunity

The most relevant policy here is Core Strategy Policy GI 4. The policy states:

“The council will work in partnership with local sports clubs and sports organisations to:

- Increase community participation in physical activity and sport to contribute towards a healthy town for Watford residents. In particular, the council's aim is to work in partnership to increase participation in the following groups: women, children and young people, 55 plus, people with disabilities and black and minority ethnic communities.
- Develop capacity within the local sporting infrastructure, particularly around clubs, coaches and volunteers, to improve sporting opportunities. In particular, the council's aim is to support local voluntary clubs to improve their ability, and to deliver through coach and volunteer development, supporting club accreditation and promoting / raising the profile of voluntary sports clubs.
- The council will consolidate and improve its sports facilities across the borough. The Sports Facilities Strategy and the evidence base that underpins it will inform decisions for development proposals concerning sports facilities. Full account will be taken of these priorities and supporting aims when considering planning proposals for physical activity and sporting infrastructure.”

The proposed levelling and the drainage scheme will allow the playing field to be brought back into use. The proposed changing facilities will also allow more opportunities for the use of the playing field by variety of users. Sport England has been consulted and is entirely satisfied with the scheme and fully supports the proposal.

The improved playing field will only be used the Glen Rovers Club for a few hours on a weekly basis between March and October. For the remainder of the time, the facility could be used for informal sport activities and general recreational purposes. In any event the proposed pitch will occupy significantly less than half the existing open space. Therefore ample space will still remain for general recreation and dog-walking purposes even whilst the playing field is being used for formal sport activities.

Impact on trees, nature conservation and wildlife

The Council's arboricultural officer has commented that “the proposal will not have an impact upon any trees. Whilst the site is a designated wildlife corridor, this largely relates to the banks of the river and the margins of the park. Much of the ground is laid to grass which is cut regularly. The area is also used as a playing field. Therefore, this part of the site does not have a high ecological value. Therefore there will be little impact on the biodiversity of the site.

The proposal will include the treatment of the invasive Japanese Knotweed which is to be welcomed from a nature conservation point of view.

Impact on the amenities of local residents

The proposed play facilities will be located about 70m from the nearest residential area. The standards as set out by National Playing Fields Association recommends a minimum distance of 30 metres between Neighbourhood Equipped Areas for Play and residential properties. Therefore the proposed distance of about 70m from residential areas significantly exceeds the national standards. Consequently, the impact of noise associated with the use of the playing field on the residential area will be limited. Further, Given the existing lawful use of the site is as a playing field, and taking account of the surrounding road network and the main railway line in close proximity, it is not anticipated that the proposed development will result in a significant impact on the amenities of the adjoining occupiers in terms noise generated from activities associated with increased use of the playing field.

Some concern has been raised with regard to the possible use of the changing facilities as a social club. The proposed changing facilities have been designed in accordance with the recommended Sport England specification. However, it would not be appropriate for the changing room building, which includes a meeting room and a small kitchen area, to be used as a social club or for any other use not related to the playing field. Accordingly, a condition is recommended to ensure that the changing room facilities cannot be used for leisure, recreation and entertainment uses.

Risk of injury

The Council has received a significant level of concern with regard to potential danger from the use of the field for hurling. It is noted that the game uses hard balls which are thrown at speed and that a stray ball may accidentally hit passers-by.

It should be noted the lawful use of the site is a playing field. The playing fields were taken out of use, due to problems with the playing surface and because of issues with drainage. There is, therefore, no change of use involved with the proposed development. The engineering works required to bring the pitch back into use as a playing field are what constitute development in this case, and these works would be the same whether the playing field is used for football, rugby or hurling.

However, whilst the lawful use of the site is a playing field, it is the case that some sports could give rise to a higher safety risk than others so far as other users of the open space are concerned. Often hurling is played using netting behind the goals and, on occasions, around the pitch. Currently, at the club's present site at Oxhey Park, prior to a hurling game temporary posts are erected and fitted with safety nets. This has been a requirement since a footpath was created in Oxhey Park. It would, therefore, be appropriate to impose a condition designed to ensure the provision, during a hurling game, of measures to ensure the safety of the public.

Impact on parking conditions and the local highway network

The Council has received a significant level of concern from local residents regarding this issue. The starting point for assessing the weight to be attached to this consideration is the fact that the lawful use of the site is for a playing field. Consequently, if the playing field were to be so used, the lawful use of the land would generate a degree of traffic on the local highway network, and result in car parking and 'drop offs' and 'pick ups'.

However, the proposed improvements to the playing field and the provision of the club house are likely to increase the use of the site, with consequential impacts on traffic and parking.

It is anticipated that Glen Rovers club will be using this playing field. The club plays both hurling and Gaelic football. The application is accompanied by a Transport Statement, which was initially submitted with the application and was subsequently updated following a request from the Highway Authority for additional information. A summary of the findings is set out below.

There are parking restrictions immediately along Radlett Road, but further car parking is available in Timberlake Car park. There are also a number of roads in the vicinity where parking is currently unrestricted. The proposed layout for the car park will provide 13 standard bays, 2 disabled bays, and 3 minibus bays.

Currently a practice session for hurling takes place on Wednesdays and for Gaelic football on Tuesdays and Thursdays. Currently there is no home game for hurling in Watford. The playing season for both sports is March to October/November, depending on fixtures and how far the teams progress in competition.

Games are played at weekends between 1.30pm and 7.00pm on Saturdays and between 1.00pm and 4.00pm on Sundays. Training usually takes place on Tuesdays and Thursdays between 7.00pm and 8.00pm.

Tuesdays are usually the busiest training evenings. The weather can have an effect on how many turn up, as well as holiday seasons, but a dry evening outside the holiday season would see an average of around 25 – 30 adults and 45 – 55 children. Some live close enough to walk to the venue; some cycle and some arrive by public transport. However, the majority travel by car and the average number of vehicles accessing the site for the Tuesday training session is 14 parking with a further 17 dropping off children and picking up when training is finished. Wednesday is the least busy training session with an average of 15 people arriving in 8 vehicles.

On match days, an average of around 60 people attend, including players, officials and spectators. Many of the attendees are players and their families travelling together. The number of vehicles varies according to where visiting teams are travelling from. Players coming from, for example, Luton or Waltham Cross, will probably use cars, whereas players from Cambridge or Oxford often travel by minibus. The Club has never formally surveyed the transport impact of its activities, but it is estimated that an average of 25 - 30 vehicles are associated with home games. Depending on how well the Club performs in

competitions, there could be one or two key matches in a season which might attract up to 100 people with 50 - 55 vehicles.

As affirmed in the Transport Statement, and confirmed by the Highway Authority, due to the level and times of club activities, i.e. evenings and weekends, the amount of traffic generated will have no material impact on the surrounding road network. In addition, any overspill from the car park can be readily accommodated in the Timberlake car park, the Bushey & Oxhey Scout Group car park at the east end of Link Road, or in the unrestricted parts of Radlett Road, Colonial Way and Rhodes Way.

The Transport Statement recommends that the club should provide a travel plan to include various measures designed to ensure that the use of the site by the club will not have a significant impact on the free and safe flow of traffic on highway network. The Highway Authority has confirmed that the proposal, subject to conditions, will not have a significant impact on parking conditions or the free and safe flow of traffic. In discussion with the applicant, part of the playing field can be used as overflow parking should the need arise. These details can be dealt with as part of the Travel Plan.

Flood risk

Significant concern has been raised with respect to the issue of flooding. These concerns have been particularly augmented because of recent flooding resulting from the heavy rain in the last winter. The initial application which was submitted back in February was considered by the Environment Agency to be unacceptable and it was withdrawn. The applicant has now provided a detailed flood risk assessment for the development of the playing field, together with mitigating measures to ensure the proposal has an acceptable impact upon the local environment, as follows:

Field drainage

- The rain water from the playing field will be drained by providing French drainage beneath the playing field. The drained water will be collected on the west side of the playing field through underground drain network and then stored in a

depression on the north side of the playing field before it is gradually released into River Colne. The improved drainage provision of the pitch is expected to increase the rate of runoff from the area of the playing surface compared to the existing situation. Therefore the idea is to reduce the rate of discharge of water into the river. For this purpose an attenuate basin of approximately 620m³ with a maximum depth of 2m, is proposed in the north of the site to attenuate any short term increased water discharged from the improved pitch.

Pavilion development

- The entire existing concrete slab will be removed and replaced by a permeable surface and a pavilion. The amount of non permeable surface as a result of the proposed will be in region of 422m² which is a significant improvement over the existing situation. Furthermore, the rainfall on the pavilion roof will be routed into two identical soak-ways below the car park. Therefore the proposed development for the pavilion and the car park will result in reduction of surface water runoff compared to the existing situation, thereby alleviating the risk of flooding.

The Environment Agency has been consulted and has agreed, subject to condition, that any impact on the local environment arising from the proposal will be acceptable. The Environment Agency has a residual concern with regard to the proposed access way to the site and the means by which it crosses the existing swale. A condition is recommended to be imposed to ensure that the proposed access way will not block the existing swale.

Overall, therefore, it is considered that the proposal will improve the drainage system without having any impact upon the local environment.

Land contamination and health

The Environmental Health officers are satisfied that the remedial measures proposed will be suitably protective of human health. It is recommended that a contamination condition be imposed should planning permission be granted to ensure that the additional works

required are undertaken and that the Remedial Strategy is amended accordingly following the additional investigative works.

Comments on the representations received

The comments and concerns raised by the residents have been outlined above. Many of their comments have been addressed within the body of the report. The other issues raised are further analysed below.

Objections	Officer's response
The land is not suitable as a playing field as it was declared to be unsafe a while ago.	The playing fields were taken out of use for football due to problems with the playing surface and issues with drainage. It has historically been used for football for many years. There is no change of use proposed in this application; the application is for engineering works necessary to bring the pitch back into use as a playing field. The sport has been played elsewhere in the borough for a considerable period of time. There has been no reported injury from this playing of the sport over the entire period which sport has been played in Oxhey Park. In any event condition is recommended to ensure that any risk to public safety is taken into account and appropriate measures are put in place whenever games are played.
Will there be any flood-lighting	No artificial lighting is currently proposed. This will limit the hours of the use of the playing field.
The report which has been carried out for the application plus the cost of the project appear quite high.	This is not a material planning consideration.

<p>The Council did not provide sufficient notification to the residents. The notice and the letters were misleading and they did not mention the proposal included hurling games.</p>	<p>The Council notified all residents directly facing the playing field and site notices were displayed all around the site.</p> <p>Because no change of use is proposed, any game can be played without the need for planning permission. Consequently, the development cannot be described as a change of use for hurling purposes.</p>
<p>It appears that a decision has already been made, as it is evident by the outrageous article of June 2014 in 'About Watford' which states 'Our playing fields at Radlett Road have been out of use for a number of years, and so we have developed a proposal for a new hurling and Gaelic football pitch with re-levelling and new drainage, as well as a new four room changing pavilion. Paul Connolly, Glen Rovers Chairman said: "We are looking forward to our future new home and want to thank the council for their help in finding it....."the Mayor's Pledge is to protect parks and open spaces! What has happened to this pledge?</p>	<p>No decision has yet been made as to whether or not planning permission should be granted for this application. That is the decision which the Development Control Committee of the Council will have to take.</p>

Conclusion

The site is within the designated Green Belt. In accordance with national and local planning policies its openness is the primary attribute which needs robust protection. Only in very exceptional circumstances should planning permission for inappropriate development be granted. In this case, very special circumstances, in terms of sport provision, do exist that would justify this development being permitted in the Green Belt.

In terms of the proposed changing room facilities, appropriate measures have been incorporated to minimise the impact of the development upon the openness of the Green Belt. The design of the building and the proposed materials are sympathetic to the character of the area. Moreover, the provision of appropriate facilities for outdoor sport and recreation are not inappropriate in a Green Belt so long as the openness of the Green Belt is preserved (NPPF, paragraph 89).

The proposal will not have a significant impact on the amenities of neighbouring dwellings in terms of noise and activities associated with the use. The increased opportunity for use of the field for sporting activities is likely to result in some additional traffic movements in the area. However, the proposal does provide some car parking spaces which will cater for the normal activities of the club. Further, the trip generation data indicates that the additional vehicular movements will be so few that the development will not have any significant impact on the local highway network, subject to the imposition of appropriate conditions.

The proposal has the potential to improve the range of sporting activities within the Borough, without having any adverse impact on the open character of the playing field and without prejudicing the existing sporting and other recreational activities currently taking place on the field.

The playing field is located in a legible place and well away from the residential areas to ensure the amenities of those areas are protected.

Overall, the development is in accordance with the policies of the Development Plan and the National Planning Policy Framework overall.

HUMAN RIGHTS IMPLICATIONS

The Local Planning Authority is justified in interfering with the applicant's Human Rights in order to alleviate any adverse effect on adjoining properties and their occupiers and on general public amenity. With regard to any infringement of third party Human Rights, these are not considered to be of such a nature and degree as to override the Human Rights of the applicant and therefore warrant refusal of planning permission.

RECOMMENDATION

That planning permission be granted subject to the following conditions:

- 1 The development to which this permission relates shall be begun within a period of three years commencing on the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 Construction of the development hereby permitted shall not take place before 8am or after 6pm Mondays to Fridays, before 8am or after 1pm on Saturdays and not at all on Sundays and Public Holidays.

Reason: To safeguard the amenities and quiet enjoyment of neighbouring properties during the time that the development is being constructed, pursuant to Policy SE22 of the Watford District Plan 2000.

- 3 No sport shall take place on the playing field unless an appropriate risk assessment in respect of that sport has been undertaken and the risk assessment has been submitted to and approved in writing by the Local Planning Authority. Any remedial measures included in the approved assessment shall be put in place before any game involving that sport is played on the field. Where the approved remedial measures include the erection of physical structures, details of those structures shall be submitted to and approved in writing by the Local Planning Authority before any such structures are put in place.

Reason: To ensure the safety of the public and to ensure that the development will have an acceptable impact upon the openness of the Green Belt site in accordance with the provision of the National Planning Policy Framework and the requirements of Policy UD1 of the Watford Local Plan: Core Strategy 2006 – 2013.

- 4 No development shall commence within the site until full details and samples of the materials to be used for the external surfaces of the building, including windows, have been submitted to and approved in writing by the Local Planning Authority. The development shall only be implemented in accordance with the approved details.

Reason: To ensure that the development applies high quality materials that respond to the buildings context and makes a positive contribution to the character and appearance of the area in accordance with the provision of the National Planning Policy Framework and the requirements of Policies UD1 of the Watford Local Plan: Core Strategy 2006 – 2013.

- 5 The proposed changing room facilities shall only be used for purposes associated with sporting activities taking place on the playing field and in particular they shall not be used for any form of entertainment or leisure purposes.

Reason: If the building hereby approved were used for non-sporting related activities, it is considered that this would be prejudicial to the interests of the quiet enjoyment of local residents and the character of the Green Belt with additional potential adverse consequences on car parking, contrary to Policies T21, T22 and SE22 of the Watford District Plan 2000 and Policies GI1 and GI2 of the Watford Local Plan: Core Strategy 2006 – 2013.

- 6 The development shall not be occupied until the parking and turning areas have been constructed, surfaced and permanently marked out as identified on drawing number 007. The car parking and turning areas so provided shall be maintained as such at all times and shall not be used for any other purpose.

Reason: To ensure that adequate parking is provided at all times so that the development does not prejudice the free flow of traffic or the conditions of general safety along the adjacent highway.

- 7 No club or other organisation shall make use of the development hereby permitted unless a Travel Plan relating to the activities of that club or other organisation has been submitted to and approved in writing by the Local Planning Authority. The club or other organisation shall not make use of the development hereby permitted unless any measures required by the approved Travel Plan have been put in place. The Travel Plan shall include a Car Parking Management Plan giving details of the operation of the car park as well as providing information with regarding appropriate arrangements and locations for “pick up” and “drop off” facilities.

Reason: To promote sustainable transport measures to the development and in the interest of highway safety and amenity.

- 8 No development shall commence within the site until details of on-site parking for all contractors, sub-contractors, visitors and delivery vehicles has been submitted to and approved in writing by the Local Planning Authority in consultation with the

Highway Authority and those details shall be provided and kept available for use at all times during the period of site works.

Reason: To minimise danger, obstruction and inconvenience to users of the highway.

9 No development shall commence within the site shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site has been submitted to and approved in writing by the Local Planning Authority:

- (1) A preliminary risk assessment which has identified:
 - (i) all previous uses;
 - (ii) potential contaminants associated with those uses;
 - (iii) a conceptual model of the site indicating sources, pathways and receptors;
 - (iv) potentially unacceptable risks arising from contamination at the site.
- (2) A site investigation scheme, based on (1), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- (3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- (4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Reason: To protect groundwater in line with Policy SD1 of the Watford Local Plan Core Strategy (2006-2031).

- 10 The development hereby permitted shall not be brought into use until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation has been submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To protect groundwater in line with Policy SD1 of the Watford Local Plan Core Strategy (2006-2031).

- 11 No development within the site shall take place until a long-term monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to and approved in writing by the Local Planning authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To protect groundwater in line with Policy SD1 of the Watford Local Plan Core Strategy (2006-2031).

- 12 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has:
- (a) submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination is to be dealt with; and,
 - (b) obtained written approval from the Local Planning Authority for that remediation strategy. The remediation strategy shall be implemented as approved.

Reason: To protect groundwater in line with Policy SD1 of the Watford Local Plan Core Strategy (2006-2031).

- 13 No development shall commence within the site until such time as a scheme to dispose of foul and surface water has been submitted to and approved in writing by the Local Planning Authority. The scheme shall make provision for roof drainage from the building to be sealed at ground level. The scheme shall be implemented as approved.

Reason: To protect groundwater in line with Policy SD1 of the Watford Local Plan Core Strategy (2006-2031).

- 14 Piling or any other foundation designs using penetrative methods shall not be used on site other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To protect groundwater in line with Policy SD1 of the Watford Local Plan Core Strategy (2006-2031).

- 15 No development shall commence within the site until a detailed method statement for the removal and long-term management or control of Japanese Knotweed on the site has been submitted to and approved in writing by the Local Planning Authority. The method statement shall include proposed measures that will be used to prevent the spread of Japanese Knotweed during any operations. Development shall proceed only in accordance with the approved method statement.

Reason: To protect groundwater in line with Policy SD1 of the Watford Local Plan Core Strategy (2006-2031).

- 16 No development shall commence on site until a detailed survey of the application site has been undertaken to assess the existing ground conditions and the extent of any land contamination and if necessary appropriate measures shall be incorporated into the development to ensure adequate protection for future occupants of the development and occupiers of existing adjoining premises from contamination. Such measures shall be agreed in writing with the Local Planning Authority prior to any works commencing on the site and shall be incorporated into the development before any part of the approved development is first brought into use.

Reason: In the interests of the safety of the existing and the future occupiers of the development in accordance with Policy SE24 of the Watford District Plan 2000.

- 17 No development commence within the site until the detailed design of the vehicular access to the site has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the approved detailed design.

Reason: In order to ensure that the proposed access will have no impact on the free flow of flood water in the existing swale.

18. The development hereby permitted shall be carried out in accordance with the following approved drawings and other documents:

SG/821/001a Site location plan

SG/821/100b Access and Constraints Plan

SG/821/200e/ Pitch Layout proposal

SG/821/300b/ Cut and Fill Construction Sections

SG/821/400a / Remedial proposal

SG/821/401/ Japanese Knotweed Treatment Proposals

SG/821/500a / car park

004 floor and roof plan proposed

007 Site plan as existing and proposed

008 Plans and Elevations as proposed

009 Contextual elevation as proposed

Documents

Design and Access Statement

WDE Remedial Strategy Report

WDE Geo Environmental Assessment

Hydro – Logic Services LLP Flood Risk Assessment Report

Transport Assessment (two documents)

Reason: For the avoidance of doubt and in the interests of proper planning.

Informatives

- 1 There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers

for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.

Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the options available at this site.

- 2 Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.
- 3 With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.
- 4 The Highway Authority requires the alterations to or the construction of the vehicle crossover to be undertaken such that the works are carried out to their specification and by a contractor who is authorised to work in the public highway. The applicant may need to apply to Highways (Telephone 0300 1234047) to arrange this or use link:- <http://www.hertsdirect.org/services/transtreets/highways/honlineservices/vxo/>

- 5 Note: should there be any obstructions on the public highway, footpath, grass verge, i.e. trees, posted signs, TG pole, lamp columns, drainage gulleys etc, then permission for removal and/or repositioning will need to be gained before work can commence on site. The applicant will need to be aware that they will/may be required to fund this work.
- 6 In dealing with this application, Watford Borough Council has considered the proposal in a positive and proactive manner having regard to the policies of the development plan as well as paragraphs 186 and 187 of the National Planning Policy Framework and other material considerations, and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2010, as amended.

Drawing Numbers

SG/821/001a Site location plan

SG/821/100b Access and Constraints Plan

SG/821/200e/ Pitch Layout proposal

SG/821/300b/ Cut and Fill Construction Sections

SG/821/400a / Remedial proposal

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004 floor and roof plan proposed

007 Site plan as existing and proposed

008 Plans and Elevations as proposed

009 Contextual elevation as proposed

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