Warren Farm Sports Centre
in the London Borough of Ealing
planning application no. P/2015/2387

**Strategic planning application stage 1 referral**


**The proposal**

Redevelopment of the site, following demolition of the existing buildings to provide a first team training and academy facility for Queen’s Park Rangers.

**The applicant**

The applicant is QPR Football Club and Community Trust, and the architect is Populous.

**Strategic issues**

The strategic issues in this case relate to principle of the development, urban design, sustainable development and transport.

**Recommendation**

That Ealing be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 65 of this report; but that the possible remedies set out in that paragraph could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

**Context**

1. On 25 May 2015 the Mayor of London received documents from Ealing Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 6 July 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

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

3D “Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and
(b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building”

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

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

Site description

5  The Council-owned site of just under 25 hectares in size is part of an extensive area of green space, accessed off the eastern side of Windmill Lane in Southall; approximately midway between the elevated M4 motorway on the south and the First Great Western (London Paddington to Bristol) Railway Line on the north.

6  The eastern boundary is defined by a railway line and additional open space adjoining the Grand Union Canal/River Brent, beyond which lies industrial land on the Waterside Industrial Estate. To the west of Windmill Lane lies an enclave of residential properties to the north, a grade two listed brick wall enclosing Osterley Park, and a substantial private residence known as Aviary Farm to the south.

7  The land immediately to the north of the application site is owned by Imperial College and is currently used for the grazing of animals. Beyond this lies the predominately residential development of Hanwell and Southall. There are semi-detached houses along the existing narrow access from Windmill Lane into Warren Farm.

8  The site is primarily used by local residents for the purposes of dog walking, exercise, cycling, weekend league football, cricket tournaments and access to Hanwell Flight of Locks and Meadows. The site is also used by the day nursery located on site and Warren Farm Radio Flyers.

9  The site is designated as Metropolitan Open Land (MOL).

10  Warren Farm is located on Windmill Lane in Southall. The site is 1.3 km south of the A4020 Uxbridge Road which is part of the Strategic Road Network (SRN) and the nearest part of the Transport for London Road Network (TLRN) is the A4 Great West Road, 2.5km to the south of the site via Syon Lane. There are no bus services running along Windmill Lane, with the nearest bus stops being on Uxbridge Road and these are therefore beyond the maximum recommended walking distance for bus services. The nearest mainline rail stations are at Southall, Hanwell and Syon Lane, all over 2km from the site, as is the nearest London Underground (LU) station, Boston Manor. Therefore, the public transport accessibility level (PTAL) for the site is 0, representing no access to public transport.

Details of the proposal

11  The application seeks to make changes to the previous permission granted in 2013 (D&P/2984/01) which sought permission to redevelop the site within Metropolitan Open Land for a training facility, including the provision of a training centre, a number of outdoor football pitches of various sizes and one indoor facility and community pitches. The key changes in this scheme include a reduction in the height and area of the indoor hall, a reduction in the height and scale of the training centre building, reduction in the size of the ground maintenance building, the relocation of the ground maintenance and community building, re-grading of the site to omit
gabion walls to create one single community plateau and re-phasing of the development so that the academy facilities will be built in two phases.

Case history

12 Planning permission has previously been given to redevelop the site for the training facility (D&P/2984/01). This was granted in 2013. A judicial review was lodged against the decision, but this was unsuccessful.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- Principle of development: London Plan
- Urban design: London Plan
- Access: London Plan; Accessible London: achieving an inclusive environment SPG;
- Sustainable development: London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy;
- Transport: London Plan; the Mayor’s Transport Strategy;

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Ealing Core Strategy, the 2013 Ealing Development Sites DPD, 2013 Ealing Development Management DPD and the London Plan (Consolidated with Alterations since 2011).

15 The following are also relevant material considerations:

- Draft Minor alterations the London Plan – Parking Standards

Principal of development

16 The principle of the redevelopment of this site for a training facility was established in the previous permission (P/2012/5124 and D&P/2984/01).

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

18 The existing site is largely open save for some existing buildings with a floor space of approximately 1,850 sq.m and proportion of hardstanding areas. The development proposes a multi-use sporting facility to support the training needs of QPR football club. The floorspace created within built form would be 13,725 sq.m and the area covered by development and pitches would be approximately 25 hectares, in effect, the whole site.

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

20 While the proposal would support outdoor recreation, there is a significant quantum of development proposed. In the previous case, the ‘very special circumstances’ for the proposed development was given significant weight, comprise the following points:

Need for development

21 In relation to the need, the development the existing facilities at Warren Farm have deteriorated sharply in recent years due to the prevailing constraints on public expenditure and a resulting lack of investment. The site is therefore unable to perform an effective role as a strategic location for community sports, although policy 5.6 of the recently adopted Ealing Development (Core) Strategy envisages the provision of “improved changing rooms, outdoor sports areas and social facilities.”

22 The Council identified in 2011 that it needed external investment to provide the finances required to improve the facilities. It embarked on a tendering process to identify an appropriate partner. The Council encouraged potential development partners to suggest a facility mix which would provide a viable opportunity whilst ensuring access for community use within the site. To assist this tendering process, the Council prepared a Development Brief for the site to offer informal planning guidance to potential project partners. Queens Park Rangers Football Club emerged from a bidding process as the Council’s preferred development partner.

23 The development proposals would deliver the needed enhancement of the sports pitches as well as delivery of a community building which would provide a high standard of changing and spectator area which overlooks the community pitches.

24 The buildings and facilities proposed, some of which will also be available for use by the local community (indoor hall), have been designed in consultation with the Council and represent a form of ‘enabling development’ to deliver the wider benefits to the local community.

25 There is therefore a compelling need for new sports facilities on the site from the local community and a championship football club has the means to deliver the community sports facilities required. In accordance with the Council’s Development Brief for the site, the proposed development provides enhanced local community facilities.

Benefits to the local community

26 The Council’s planning brief for the site highlights the importance of open space for sport in a growing and densely populated area, identifying a particular shortage of open space in Southall West, Southall Green and Southall Town Centre.

27 Policy 3.1 affirms the Mayor’s commitment to ensure equal life chances for all Londoners and where appropriate, to address barriers to meeting the needs of particular groups and communities. The policy requires development proposals to protect and enhance facilities and services that meet the needs of particular groups and communities; it also states that proposals involving the loss of such facilities without adequate justification, or provision for replacement, should be resisted. Policy 3.2 requires developments to improve health and promote healthy lifestyles to reduce health inequalities.
London Plan Policy 3.19 supports development proposals that increase or enhance the provision of sports and recreation facilities. Proposals which maximise the use of education facilities for community or recreational use is also supported by London Plan policy 3.18. As part of the development proposals, the application would enhance the current sports pitches and provide for new sports facilities for use by the local community.

In addition it should be noted that in line with the policies of the London Plan, the QPR charitable trust’s aims of enhancing the life chances of individuals and neighbourhoods, working closely with football club and other partners to offer a diverse range of opportunities in football and sports development; community and health; education, training and employment; social inclusion and diversity; community and facility development; and strategic business development are particularly welcome and should be secured through the permission.

Alternative sites

By its very nature, the development of a professional football training centre and academy comparable to that proposed by QPR requires a significant take up of land, which includes multiple standard-sized playing pitches, supporting building and a suitably-sized indoor pitch. The club needs to provide training academy and a number of other football clubs have training grounds on MOL/Green Belt sites.

The requirement becomes even more onerous for a dual football club and community facility, given Ealing Council’s separate requirement for the provision of community football pitches, cricket wickets, multi-use games areas, changing areas, a community space, and a number of class/flexible use rooms to accommodate a community development programme.

As part of the applicant’s justification for development on Metropolitan Open Land, the planning statement refers to the previous permission’s assessment of alternative sites. As previously accepted, the applicant has concluded that no other suitable sites are indeed available and Warren Farm remains the most suitable option for this form of development given the Council’s requirements for a development partner.

Impact on openness of MOL

It is clear that outdoor sports and recreation is an appropriate use of MOL. Despite a significant net increase in the footprint of built development, the rest of the site would remain predominantly open as a result of the number of pitches.

The new buildings are designed to be sited in a relatively central position, in the area originally occupied by built development on the site. This would avoid a dramatic visual change in the form of development. The development would also have limited visual impact owing to the screening of the site and location of buildings.

Summary

It is acknowledged that there is a need for the development and a need to enhance outdoor sports provision within the borough and improved facilities at the site. The development would provide for an essential needed community use providing benefit to the community. The applicant has also demonstrated that there are no alternative sites for the proposals and the case for ‘very special circumstances’ in which development would be accepted on MOL has been given. In addition to this, the applicant has demonstrated that there will be minimal impact on the openness of the MOL. The principle of the development is therefore acceptable in strategic terms.

Urban design
36 The proposed development sits on a significant expanse of open space and is primarily on the location of the existing Warren Farm Sports Centre. The majority of the site would be occupied by sports pitches which will have little impact on the openness of the area and present no strategic design concerns. However, care needs to be given to the impact of floodlighting on surrounding properties.

37 The layout, height and massing of the proposal remains largely as it did in the previous scheme where the form of buildings was driven by the internal requirements of the operation. The materials appear to be high quality and should be secured though condition.

**Inclusive access**

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

39 The development incorporated inclusive design particularly within the proposals address circulation, reception facilities and the community sports facility. The scheme complies with London Plan policy 7.2 and is acceptable in this regard.

**Sustainable development**

**Energy**

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

41 The applicant should provide evidence of how Policy 5.9 has been addressed to avoid overheating and minimise cooling demand. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended.

42 The development is estimated to achieve a reduction of 12 tonnes per annum (2%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

43 In relation to the ‘clean’ stage of the hierarchy, the applicant has carried out an investigation and identified that there are no existing or planned district heat networks within the vicinity of the proposed development. The applicant has also identified that a site wide heat network would not be viable for the following reasons:

- Size of the plant could not be accommodated within building footprint
- Minimal heating and hot water demand in phase 1, meaning CHP would only be operational in phase 2
- It would not be viable to install the energy solutions given the scale of the development.

44 However, no evidence has been provided to support these claims. A site heat network will be required unless it can be clearly demonstrated that it is not applicable (for example a cost
analysis of an external energy centre, or why it can’t be provided in the maintenance building. It should be noted that it would be acceptable to install a site wide network within phase 1 served by communal gas boilers with CHP coming on line in phase 2.

45 The applicant is proposing to install a 30kWe gas fired CHP unit to provide the heating demand for the swimming pool only. This would provide a reduction in regulated CO\textsubscript{2} emissions of 26 tonnes per annum (5%). Further information should be provided on the location and floor area of the proposed CHP plant room.

46 The energy strategy has investigated the size of a suitable CHP for a site wide network and identified at 100kWe CHP with 25 m\textsuperscript{3} thermal store would be suitable. Along with the information outlined above, the applicant should provide the carbon emissions savings for a CHP led site wide heat network.

47 In relation to the final ‘green’ stage of the hierarchy, the energy strategy outlines a number of renewable energy technologies and is proposing to install 600 sq.m of photovoltaic panels on the roof of the development. A roof plan showing these should be provided. Further details should be provided on the panel efficiency used and if applicable, higher efficiency panels and alternative locations should be investigated. A reduction in regulated CO\textsubscript{2} emissions of 45 tonnes per annum (9%) would be achieved through this stage of the hierarchy.

48 Overall, a reduction of 83 tonnes of CO\textsubscript{2} per year in regulated emissions compared to a 2013 Building Regulations complaint development is expected, equivalent to an overall savings of 16%. This falls significantly short of the target within Policy 5.2 of the London Plan and is lower than would have been secured in the previous application. The comments above should be addressed and further scope for savings investigated.

**Water**

49 The site is within Flood Zone 1 with no significant risk of surface water flooding, and the proposal is in line with Policy 5.12.

50 The flood risk assessment states that greenfield run-off rates would be met up to the 1 in 100 year + climate change storm event. This would be achieved through infiltration in some areas, swales and filter drains, a 6500m\textsuperscript{3} detention basin providing attenuation up to 1 in 30 year event and designs for exceedances.

51 Given the nature and the location of the proposals, these elements would meet the requirements of London Plan Policy 5.13.

**Transportation**

52 There are no standards relating to sports facilities such as this in the London Plan. Therefore, the level of parking proposed should be fully justified through the transport assessment. In the previous stage 1 response, TfL assed for a fuller justification for the level of parking, and while this issues was resolved by the previous stage 2 report, the applicant should confirm if any of the parking circumstances have changed, particularly in regards to the peak times of different uses on site.

53 10% of all spaces should have active and 10% passive electric vehicle charging points in line with London Plan Policy 6.13 and this should be secured through condition. A car parking management plan should also be secured by condition which outlines how spaces would be allocated and shared and how any restrictions would be enforced. It should also outline how Blue Badge spaces would be monitored and reviewed.
No information has been provided on cycle parking and this should be provided to officers.

TfL are satisfied that the impact of additional vehicular trips at the Windmill Lane/Uxbridge Road junction would be insignificant and outside peak periods. It is also unlikely that there would be significant impact on public transport services.

Pedestrian environment improvements either through section 106 or 278 as appropriate. TfL also request Legible London signage is introduced through the development as part of the transport enhancement contributions in the section 106. The signage should cover routes from the development to bus stops.

A framework travel plan has been submitted, however it fails the ATTRBuTE tool assessment and amendments are required. A travel plan should be secured, monitored, reviewed and enforced through the section 106 agreement.

A construction logistics plan and delivery and servicing plan should also be secured via planning condition to be discharged in consultation with TfL. These should be in line with Policy 6.14 in relation to ‘Freight’.

**Community Infrastructure Levy**

The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor’s CIL will contribute towards the funding of Crossrail.

The Mayor has arranged boroughs into three charging bands. The rate for Ealing is £35/sq.m. The required CIL should be confirmed by the applicant and Council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: [http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents](http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents) as amended by the 2011 regulations: [http://www.legislation.gov.uk/uksi/2011/987/made](http://www.legislation.gov.uk/uksi/2011/987/made)

London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor’s CIL. Ealing has yet to adopt a scheme has adopted a scheme. See the Council’s website for more details.

**Local planning authority’s position**

The local authority’s position is not yet known.

**Legal considerations**

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

**Financial considerations**
There are no financial considerations at this stage.

Conclusion

London Plan policies on MOL, urban design, accessible design and transport are relevant to this application. Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Sustainable development:** Further information on the energy efficiency savings should be provided. The scheme should include a site heat network and further information on the provision of CHP should be provided. Further opportunities for PV should be investigated.

- **Transport:** Further details on the basis of the car parking quantum proposed should be provided along with details of cycle parking. A travel plan, public realm improvements and signage should be secured through the S106 and conditions in relation to car park management plans and servicing plans should be secured.

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