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Date: 15/11/2022

Subject: 22/P3054 - David Lloyd

**Application reference number: 22/P3054.**

**Name: Raynes Park and West Barnes Residents' Association**

**Address: 129 Grand Drive, SW20 9LY**

**Planning application description: Erection of an Open Sided Cover for Padel Tennis Courts**

## **Comments**

### **1. Visual Impact on Metropolitan Open Land (MOL)**

The Raynes Park and West Barnes Residents' Association (RPWBRA) notes that this planning application site adjoins Prince George's Playing Fields (PGPF). These playing fields are designated as Metropolitan Open Land (Merton's Local Plan, 9 July 2014, Site and Policies Plan and Policies Maps, Appendix B, Section B.1, refers) and also as a Site of Borough Importance for Nature Conservation (Appendix C. Section C.4, refers)

The proposed height of the canopy is 10.1m. However, as the proposed location is on the most elevated part of the David Lloyd site, the canopy would appear even higher when seen from PGPF. The greater part of the playing fields is approximately 3m lower than the ground level at the proposed canopy. This effectively makes the overall height difference approximately 13m above PGPF.

This, together with the proposed canopy's footprint (45.0m long and 21.5m wide) would create a far greater visual impact than the existing canopies at the David Lloyd site and would be deleterious to the visual amenity of PGPF.

Also, the existing canopies are lower and are not permanent. As these are taken down in the summer months, the proposed canopy would then be more intrusive than inferred by the applicant's "Proposed Padel Canopy Views".

We note that the Natural Environment Policy DM O1, "Open Space", Policy e), states that [a] development in proximity to and likely to be conspicuous from MOL, will only be acceptable if the visual amenities will not be harmed by reason of siting, materials or design.

Additionally, DM O1, Section 5.5, requires that MOL is protected from development proposals which would be visually intrusive, and that adjacent development must not adversely affect amenity, quality or utility of the open space.

Due to its overbearing height and size, we aver that this application is in breach of Policy DM O1, Policy e and Section 5.5, due to its significant visual impact, when viewed from MOL.

### **2. Conservation and Light Pollution to Site of Importance for Nature (SINC)**

The Padel Courts already have floodlighting and this is downward facing, so as to minimise light leakage into the surrounding area. However, we are concerned that the proposed canopy is likely to be highly visible after dark, due to the refraction of reflected light into the surroundings.

We note that Design Policy DM D2, "Design Considerations in all developments". Section 6.19, states that inappropriate lighting can cause light pollution. PGPF is a SINC and we are therefore concerned that light pollution would damage the natural habitat, especially for nocturnal animals, including the bats that forage for insects at PGPF and the resident owls. Little Owls breed most years on PGPF and light and noise could impact on their ability to hunt.

For this reason, we consider that the application is in breach of Policy DM D2, "Design Considerations in all developments".

### **3. Advertising**

The applicant's "Proposed Padel Court Elevations" and "Proposed Padel Canopy Views", pages 7, 9 & 11, show that the canopy will display advertising in the form of the David Lloyd logo. For the reasons explained above, this is likely to be illuminated after dark, as well as be visible from a considerable distance during daylight hours.

We note that Policy DM D5, "Advertisements", requires that that advertisements are subject to express consent. We therefore consider that this application seeks to include advertising without overtly seeking consent.

We therefore conclude that the application is in breach of Policy DM D5, "Advertisements".

### **4. Conclusion**

Application site adjoins PGPF, which is designated as MOL and as a SINC. The proposed canopy would will have a deleterious effect on the visual amenity and natural environment of PGPF and would carry advertising. It is, thus, in breach of Planning Policies DM O1, DM D2 and DM D5.

We therefore urge refusal of this application.

Jeremy Cuthbert

On behalf of Raynes Park and West Barnes Residents' Association