

16/08327/FUL

Consultations and Notification Responses

Ward Councillor Preliminary Comments

Councillor Collingwood

Original Comments: I have a personal but non pecuniary interest in this application. Having said that the residents have raised a number of planning issues including the design of the building, noise that will be generated and car parking. Therefore I request that the application be brought to the next Planning Committee.

Further Comments: This application and site is a major application in the town. I remain to be convinced that it has overcome the residents previous objections. I request that the application is considered by the Committee.

Parish/Town Council Comments/Internal and External Consultees

Marlow Town Council

Initial Comment: Marlow Town Council notes the proposed replacement to the Clubhouse and fully supports this application. The club already provides excellent facilities for a range of sports to an ever increasing membership, the new clubhouse will enhance its further development plans to make the Club a centre of excellence.

Further Comment: No objection - subject to consideration given for softening the visual impact.

County Highway Authority

Comments: I am aware that the 10(no) parking spaces to the rear of the existing/proposed pavilion are located on what appears to be a grass field and served by an unbound track. Whilst a significant distance from the highway I would request a condition ensuring that all additional parking was subject to appropriate surfacing (e.g. geotextile, grasscrete etc.) in order to make them appear practical to use, therefore avoiding any resultant displaced parking outside of the site.

Nonetheless, in general consideration of the suitability of the existing site access, level of overall car parking provision and relative sustainability of the site, I do not have any objections or further conditions to recommend for this application with regard to highway issues.

Environment Agency (south-east)

Initial Comments: Originally objected to the application on grounds that it fails to demonstrate:

- i) that the loss of floodplain caused by the development could be mitigated for, with an appropriate allowance for climate change
- ii) that the appropriate allowances for climate change have been considered for this development using the latest guidance to ensure that flood risk is not increased

Further comments: [in March 2017] In response to the further submissions of the applicant the agency has reviewed the Marlow Sports Club Flood Risk Assessment (FRA) Addendum ref: 161070-02 and have removed their objection to the proposed development on flood risk grounds, subject to condition.

Revised comments: [in April 2017] Object. Having reviewed the submission do not consider that adequate information submitted to demonstrate that concerns met.

Final Comments: [November 2017] Following a review of the revised FRA, we can confirm that we are now able to remove our objection to the proposals on fluvial flood risk grounds subject to conditions. These relate to finished floor level of the building, the storage shed, steps and terrace being floodable

Control of Pollution Environmental Health

Initial Comments: No objections; suggest attachment of informative with respect to the control of construction noise.

Further Comment: From an environmental health perspective this application does not raise any unsurmountable issues (the Environment Agency and Bucks County Council will be commenting on flooding and surface water drainage respectively) and the 'no objection' comment by this Department at the start of the year is still valid and appropriate.

However it is clear from the numerous representations made by local residents against this application that there is significant (and justified) concern about the possibility of noise resulting from the use of the pavilion for social events during evenings and weekends, especially as there is a terrace area proposed at ground level and several bi-folding windows proposed on the first floor. Should this application receive permission then the new pavilion will require a new premises licence (under the Licensing Act 2003) in order to sell alcohol and to host social events. This allows the Licensing Team at WDC to impose certain site-specific conditions that will take into consideration the new design of the pavilion and its increased potential for noise leakage, as well as imposing strict times of use and other appropriate noise-limiting measures. This process also allows local residents to raise any objections/concerns and to have their say. No objection.

Landscape Officer

Comment: The principal consideration is landscape policy L2. The proposed development is located in the same position as the existing clubhouse though with a moderately larger footprint and greater height. It will be seen as an individual building with positive modern architectural merits, of a character consistent with its function as part of a sporting venue and located in its own landscape setting. For these reasons I do not see this as being at odds with landscape policy L2.

The proposed development is located outside the Chilterns AONB and does not appear to affect the setting of the AONB.

The site is within the Metropolitan Green Belt but, for the same reasons as those outlined above, I do not see the proposed development as detrimental to the landscape character, quality or openness of the Green Belt. Views of the building appear to occur mainly from within the sports ground along with views from Pound Lane to the north and partial/glimpsed from Lower Pound Lane to the east. There does not appear to be views from the Thames footpath or the adjacent Court Garden leisure complex. With most residential properties also well separated or screened from the site, the proposed development is unlikely to have any significant adverse impact upon public and private visual amenity.

Ecology Officer

Comments: No objection subject to attachment of an informative.

Leisure and Community Services

Comments: I write in support of this application. Marlow Sports Club is a thriving and successful organisation that is a major provider of sports facilities and opportunities for local Marlow residents. The application forms part of a long term direction of travel to provide the best and most appropriate sports facilities for Marlow. The new pavilion will be fully accessible, which is a major improvement on the current one. It also reflects fully the needs of the growing club it will serve, with modern changing and reception facilities for home and away participants and supporters. The Club has a strong relationship with local schools and the new pavilion forms an important community resource for Marlow.

Conservation Officer

Not originally consulted

Comment: The proposed design seems out of scale, makes no attempt to evoke cricket pavilion architecture and proposes a highly unsympathetic palette of materials wholly alien to the character of the adjacent conservation area. This seems a missed opportunity for a significant location adjoining the CA.

Buckinghamshire County Council (Non Major SuDS)

Not originally consulted

Initial Comments: [April 2017] I have concerns that neither surface water nor groundwater flood risk has been adequately addressed in both the FRA and FRA addendum.

The following matters are unclear from both the FRA and FRA addendum:

- Existing impermeable area - the applicant must provide calculations showing the existing impermeable area a) including the containers b) without the containers. These calculations should also include the existing parking areas.
- Proposed impermeable area – the applicant must provide calculations showing the proposed impermeable area a) including the proposed parking areas (and containers if these are to remain onsite). If the impermeable area is increasing, we expect the applicant to demonstrate how the surface water runoff from this area will be mitigated and in this case consider the implications of the reduction in the storage area of the existing surface water flooding in this location.
- Existing drainage regime –the FRA (6.2) mentions that the existing site drains by soakaway, the applicant must confirm the location of the soakaway, its condition and capacity. The applicant must also demonstrate that infiltration is a feasible method of surface water disposal with consideration of the anticipated high groundwater levels. Ground investigations should be completed in order to evidence this. If infiltration is shown not to be feasible, the applicant must follow the discharge hierarchy as detailed in the NPPG (080 Reference ID: 7-080-20150323)
- The FRA does outline different flood resilience and resistance measures, however it is not clear which of these measures will be implemented. In addition, the finished floor level is also unclear. We would want to see that there is sufficient freeboard between the finished floor level and the anticipated surface water flood depth for the 1 in 100 year + CC return period.

The applicant should also review our requirements detailed in the Developer Pack which is available to view on our website:

<http://www.buckscc.gov.uk/services/environment/flooding/sustainable-drainage-suds/>

I am going to contact the Environment Agency to understand their views from a fluvial flood risk perspective. I am also going to try to understand more about the Marlow FAS project and how that impacts the site. These things may take a little bit of time as the Environment Agency are very busy but I think it's important these discussions take place to understand flood risk as a whole for the site.

Based on the submitted information, the LLFA would raise an objection to the proposals. We would encourage the applicant to revise the FRA to include the above information and that required by the Developer Pack.

Further Comments [November 2017] Maintain objection, as inadequate information provided to demonstrate flooding issues adequately addressed.

Final Comments: [March 2018] Buckinghamshire County Council as Lead Local Flood Authority has reviewed the information provided in the Flood Risk Assessment Addendum No. 4 (161670-60, Dec 2017, Ardent Consulting Engineers). The LLFA **removes their objection** to the proposed development **subject to the following conditions listed below**.

The surface water drainage scheme proposes utilise a green roof and an attenuation tank. Surface water runoff will be discharged to an ordinary watercourse to the south of the site at a rate of 7l/s, which will provide a minimum of 50% betterment for the existing drainage scheme. Section 2.28 of the Flood Risk Assessment states that rainwater harvesting will be explored, an approach that is strongly encouraged. Water rainwater harvesting systems can be used to flush toilets and outdoor

taps.

It is stated within the Flood Risk Assessment (2.31) that the system has been designed to attenuate the 1 in 30 year storm event and that any flooding for the 1 in 100 year storm event plus 40% climate change will be stored onsite. However, calculations have not been submitted which show this, we require details of critical storm durations for the 1 in 30 year storm event and the 1 in 100 year storm event plus 40% climate change as this will demonstrate how the proposed system as a whole will function during different storm events.

We also request calculations which show a submerged outfall, in scenarios where there is a high water level in the ordinary watercourse the surface water will not be able to discharge and will cause the system to 'back up'. It is important to understand how the system will perform. We would request the following conditions be placed on the approval of the application, should this be granted by the LPA:

Condition 1

Development shall not begin until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include:

- Consideration of rainwater harvesting
- Full construction details of all SuDS and drainage components
- Detailed drainage layout with pipe numbers, gradients and pipe sizes complete, together with storage volumes of all SuDS components
- Calculations which show how the system functions with a submerged outfall
- Critical storm durations to demonstrate that the proposed drainage system can contain up to the 1 in 30 storm event without flooding. Any onsite flooding between the 1 in 30 and the 1 in 100 plus climate change storm event should be safely contained on site.

Reason: The reason for this pre-start condition is to ensure that a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 103 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

Condition 2

Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority to demonstrate that the Sustainable Urban Drainage System has been constructed as per the agreed scheme.

Reason

The reason for this pre-occupation condition is to ensure the Sustainable Drainage System is designed to the technical standards

Ordinary Watercourse Informative

Under the terms of the Land Drainage Act 1991 and the Floods and Water Management Act 2010, the prior consent of the Lead Local Flood Authority is required for any proposed works or structures in the watercourse. After planning permission has been granted by the LPA, the applicant must apply for Land Drainage Consent from the LLFA, information and the application form can be found on our [website](#). Please be aware that this process can take up to two months.

Representations

The following representations were received in respect of the original submission prior the Officers' report being completed in preparation for the application to be considered at Planning Committee in April 2017:

35 comments were received supporting the proposal:

- I am a direct neighbour and have been for 27 years at Lower Lodge Lower Pound Lane. I fully support this application. I believe Marlow Sports Club need a new pavilion in order for it to flourish and provide up to date facilities all users.
- Club has a long history in the town but facilities need fundamental improvement
- Existing facilities are inadequate/awful for membership now numbering 2,200 members
- Will provide much better facilities which will benefit entire community
- Club now has running and cycling sections
- Will encourage more participation in sport especially by the young
- Close to town so we walk to coaching there
- Needed to facilitate use by ladies and excluded groups
- Changing facilities for women are inadequate
- Will facilitate broader recreational use and help build partnership with schools etc.
- Will be eco-friendly and sustainable
- Will preserve Marlow's beautiful green space for future generations
- I am not looking to stop a new club house to support this popular club but I am concerned that the development is being undertaken in stages that local residents may not fully appreciate. The very large club house / events venue, new entrance, new address off Lower Pound Lane, development of new pitches and flood lighting to the west of the present hockey club, removal of trees, are all part of the development. At present the neighbours have only been asked to consider a club house, not all of the above issues. To ensure that the whole site works logistically, environmentally and as a part of a residential area I would suggest all these things need to be considered holistically. This development also needs to be considered as to how large numbers of people will be able to use a limited road and parking system when Higginson Park and Marlow Town are hosting the large events of the social, cultural and sporting calendar for Bucks

18 comments were received objecting for the following reasons:

- Real address is Pound Lane
- Iconic pavilion demolished and replaced by what looks like an office block
- Ugly unnecessary eyesore out of keeping with an expensive residential area
- Level of members/sporting activities do not justify building this size
- They are exaggerating their membership
- Believe it is intended more for private functions than for club events
- Noise is bad enough with 2 large events a year, which would be made worse
- Nowhere near enough parking for such events
- People park on the road already when using the tennis courts, this will exacerbate this situation to the detriment of the safety of pedestrians
- Access is dangerous already
- Concerned that Lower Pound Lane may be used for access
- More noise via the openable windows, particularly during functions
- Increased risk of flooding
- Increase risk surface water and ground water.
- Not looking to stop a new club house but this is first stage of an expansion that should be looked at holistically
- Increased noise
- Increased light pollution
- Application should be considered at Planning Committee
- Other residents concerned about property values and general disturbance
- If they need a building this size they should sell the site and find another one near the town with space for all their activities

Since this, over 70 additional representations have been made. Some are from the same objectors and some comprise multiple representations from individuals. The representations also include an objection from the Marlow Society in recognition of the objections raised by local residents. The representations re-iterate the objections originally lodged and raise the following additional concerns:

- Accuracy of FRA questioned
- Environment Agency only concerned with fluvial flooding, no consideration given to groundwater, surface or sewer flooding
- The development should not proceed until the flood alleviation scheme has been fully implemented
- Whilst the need for a replacement pavilion is acknowledged, the proposal goes beyond what is reasonable to serve the sports needs of the site and Club and instead caters for large functions. This makes the increase in size of the building excessive in Green Belt terms and has adverse implications for neighbour amenity
- The design of the building with sliding doors opening up on to a large terrace will result in significant increase in noise and disturbance
- There are existing traffic congestion and parking problems associated with the site and the development will exacerbate these
- Adverse impact on wildlife
- If permitted the scheme should include significant additional planting to enhance the landscape