

# DESIGN AND ACCESS STATEMENT Proposed Extension to Existing Sand Arena

# Ham Polo Club, Petersham Road, Petersham, Richmond, TW10 7AH

This design and access statement is to accompany a planning application for an extension to the existing sand arena at Ham Polo Club, as detailed on the accompanying drawings and reports.

# Background

The site refers to Ham Polo Club, which consists of a polo field, equestrian track and various buildings associated with the use of the club such as stables, offices and club house. To the North West of the site there is an existing sand arena which is enclosed by a timber fence. The area to the south of the existing sand arena which would form the area for the extension is used by the club for stick and balling. The club currently uses the existing small arena for horse jumping / riding lessons, but the uses are restricted by the arena's inadequate size. An extension to the arena, as proposed in this application, would be of massive benefit to the club and its members by safely facilitating a much broader spectrum of uses, including winter polo, riding lessons in the winter months, schooling for lunging/dressage and jumping for non polo.

Being able to use the sand arena for the previously mentioned equestrian activities throughout the year, but especially in the winter, would help to establish a more even usage of the club throughout the course of the year, rather than just during the summer season which runs from April - September.

Currently, horses at the club are turned out on the grassed area to the north of the existing sand arena. This is problematic as trespassers are free to wander on to the land and come into contact with the horses, which poses a health and safety risk to the public and horses alike. There have been numerous issues in the past with dogs running onto the area and the public feeding the horses. The proposed enlarged sand arena would also provide a safer, more practical area for turning out the horses, as well as the other uses described above.

## Winter Polo

Part of the use of the proposed extended Sand Arena would be Winter Polo. Winter Polo, sometimes called Arena Polo, is a smaller, faster paced version of traditional polo which is

played on an all-weather surface and has its own rules. The typical game consists of four chukkas (or periods) of six and half minutes each.

The sport is played on a smaller pitch than traditional polo, which is fully enclosed by angled walls of four or more feet tall. The ball has the same characteristics as a mini football and is larger and softer than the hard plastic ball used in outdoor polo. Due to the smaller pitch size players use the inclined perimeter walls to bounce and pass the ball off, similarly to indoor football, so the requirement for a solid, close boarded fence is imperative. In comparison, the ball used for traditional polo is smaller and harder and bears more resemblance to a cricket ball, and will not bounce as high as a winter polo ball when struck. This is why a traditional polo field only has a 200mm high kick board to its perimeter.

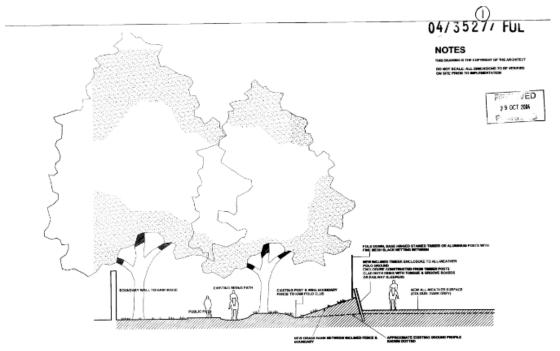
A Winter Polo team is made up of three players, meaning that the whole team has to commit to either attack or defence, quickly switching between the two, meaning the pace of the game is a lot quicker. Winter Polo also makes a great introduction for beginners and novice players as it is a great way to learn to play polo.

## The Site

Ham Polo Club is part of the Ham House Conservation Area and is close to Ham House which is a Grade I Listed Building and a Scheduled ancient monument. The estate of Ham House is Grade II\* listed, along with the adjacent German School. The site is within three Metropolitan Open Land Designations (Douglas House, Ham House, and Ham Polo) and forms part of a Site of Nature Importance (Field North of Ham House), Public Open Space (Meadows in front of Ham House and Petersham Meadows) and is within Flood Zones 2, 3, 3a and 3b, an Archaeological Priority Area and Thames Policy Area. There are also a number of protected views and vistas across the site. The site for the extended arena is within the grade II listed registered historic park (Ham House Sandy Lane).

## **Application History**

A planning application (ref 04/3527) was submitted by Ham Polo Club back in 2004, for the Provision of an all weather polo facility on the same area of Ham Polo Club's site, which involved laying a new surface with banks to the sides and a 2m high timber fence. The proposal also had retractable posts with netting between to a height of 4.8m in total. The banks themselves would be to 1.3m high, with the 2m high fence on an incline as shown in the diagram below:



TYPICAL SECTION THROUGH WESTERN BOUNDARY 1:100

It was proposed to raise the floor level of the entire arena above ground level by around 300mm. The proposed playing surface was a synthetic all weather surface, dark grey in colour.

The application was refused on the following grounds:

## U02933 Design and Trees

The proposal, by reason of its design, siting and materials, and the jeopardisation of the long term health of trees comprising an integral part of historic landscape and important to the visual amenities of the area, would be detrimental to the character and appearance of this part of the Historic Garden and Park Registered Grade 2\*, the Ham House Conservation Area, the setting of the Grade 1 listed Ham House, strategic views, and the Thames Policy Area and could prejudice proposals set out in the Thames Landscape Strategy and the Ham Avenue Restoration Management PLan to replant limes along the Melancholy Walk.

## U02934 Nature conservation reason for refusal.

It has not been demonstrated to the Council's satisfaction that there would be unacceptable harm to nature conservation interested and protected species.

Whilst obvious similarities can be drawn between the previously refused application and the current planning application, there are fundamental differences in the design which will be further addressed throughout this report.

Further to this, a subsequent planning application for an all weather facility on the northernmost part of the site was approved in late 2012 (ref. 12/0926/FUL). The perimeter fence was reduced to 2m, the bank removed, the netting removed and the arena was reduced in size. This was never implemented due to the proposed new location being ultimately deemed unsuitable for the club, given that it would reduce the size of existing polo field on which it was proposed, to be too small to hold traditional polo matches. The

details of the decisive factors for this application will also be referred to in the remainder of this report.

#### **Pre-App Advice Enquiry**

Pre-application advice was sought from London Borough of Richmond upon Thames Council ref 21/P0009/PREAPP. The Council's response, dated 20 April 2021, raised no in-principle objections, and the key issues were identified in the pre-app response as:

- A: Principle of Development / Metropolitan Open Land (MOL)
- B: Design Consideration, impact upon Heritage Assets, views and vistas
- C: Neighbouring Amenity
- D: Ecology / Biodiversity and
- E: Trees
- F: Flood Risk
- G: Transport
- H: Fire Safety

The remainder of this document will address each item in turn. It is worth mentioning that at no point in the council's pre-app response was any weight given to the previously refused scheme of 20 years ago. However as previously mentioned, there are fundamental differences in the design which will be further addressed throughout this report.

#### **A: Principle of Development**

National planning policies on Green Belt land set out within the NPPF also apply to MOL. Paragraph 145 of the NPPF states that the construction of new buildings should be regarded as inappropriate in Green Belt, but one of the exceptions to this policy include for the provision of appropriate facilities for outdoor sport and outdoor recreation, so long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

The proposed extension to the sand arena provides an appropriate facility for outdoor sports and outdoor recreation, and therefore complies with this exemption, as was agreed with the Council in the pre-application advice response.

Policy LP 31 of the Local Plan states that

#### Public Open Space, Play Space, Sport and Recreation

A. Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced. Improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged.

The extended sand arena will provide a benefit to all ages of the local community by enabling the provision of winter polo and other equestrian activities all year round, such as riding lessons, dressage and show jumping. The proposals are therefore in line with the intentions of this planning policy to increase sports and recreation facilities within the borough. The community benefits are further discussed later in this report.

**Policy LP 25** of the Local Plan discusses appropriate development within the borough's centres, and states that the council will encourage proposals for leisure, cultural and tourism facilities. Whilst the application site is just outside of Richmond Centre, it is clear that the proposed sand arena extension is the spirit of the Council's policy to encourage leisure, cultural and tourism facilities within the borough.

**Leisure** - the extension to the sand arena will provide a larger, more inclusive facility for members and visitors alike to enjoy Polo and other equestrian disciplines throughout the entire year, rather than just throughout the summer months. This promotion of this much loved leisure activity is therefore in line with council's aspirations set out in the local plan.

**Cultural** - Ham Polo Club began life as the Ham Common Polo Club in 1926, and is approaching its 100th birthday. The club is deeply ingrained into the rich equestrian heritage of Richmond and forms an intrinsic part of the local culture. The extended sand arena will help to ensure that this cultural mainstay of the area is protected and made more accessible to locals and visitors alike, which is therefore in line with council's aspirations set out in the local plan.

**Tourism** - Ham Polo Club currently attracts many tourists to the club to enjoy watching polo on a Saturday or Sunday throughout the summer months. They can either join members within the club house, or enjoy a picnic around the sides of the polo field and take in the spectacle of one of the world's oldest known team sports. The proposed extension to the sand arena will provide a facility where tourists and non-members can have polo / riding lessons which will be of real benefit to the tourism market and local community alike.

Further to the above, **Policy LP 43** from the Local Plan states that "the Council will support the sustainable growth of the visitor economy for the benefit of the local area by:

1. supporting proposals which promote and enhance the borough's existing tourist attractions including the unique, historic and cultural assets that are connected via the River Thames.

# **B: Design Consideration / Heritage**

The original design submitted within the pre-app advice enquiry was for the extended sand arena to have a 2m high timber fence to its perimeter, with netting above. During the pre-app advice zoom meeting, Senior Planning Officer, Wendy Wong Chang voiced her reservations about the height of the proposed netting above the timber fence. It was agreed that omitting the netting and limiting the close boarded timber fence to 1.5m in height would preserve the setting, character and appearance of nearby heritage assets.

## **Timber Fence**

The 1.5m high close boarded, inclined timber fence is a necessity for the proposal to allow winter polo to be played as was described earlier in this report. The enclosed fence will also be of huge benefit to the horses during turning out and to the riding school by providing a secure and protected enclosure, which horses will respond very positively to. It will also ensure that no dogs can escape onto the arena, which causes great distress to horses and riders alike, as well as causing obvious safety issues.

The proposals have been carefully detailed to ensure that the advice regarding the fence height has been followed. Having said this, the proposed elevation to the top of drawing

WAALTD34 - 10 shows how the fence has been designed to a lower height of 1.5m, when compared to what was originally proposed during the pre-app advice enquiry (1.8m). Given the undulating nature of the surrounding landscape being retained so as not to affect any root protection areas, and as shown on the accompanying site sections and elevation, at its highest the fence would be 1661m when viewed from outside the arena, and at its lowest would be 1191mm. From the playing side of the arena, the fence would be a maximum of 1.5m as is shown on the attached drawings.

This lower fence will ensure that the open nature of the site is retained, and various photomontages are included within the appendix of this report, from key vantage points to demonstrate this. Further to this, the visual appearance of the proposed new fence will be softened with a sympathetic planting scheme, with carefully selected hedgerow and planting that flanks the proposed new fence.

The photo below shows the existing arena fence also flanked by hedgerow, so it is submitted that the proposed new fence and hedgerow will preserve the character and appearance of the Conservation Area.



Further to the above, the planning officer in the previously approved scheme that was never implemented (ref 12/0926/FUL) decided that *"the enclosure would comprise an inclined timber structure, untreated to an overall height of 2m above ground level.... Given the appearance of the enclosure itself would be similar to that of an ordinary fence in terms of materials and height... it is considered that the proposal would now result in no unacceptable impact on the openness or character of the area."* 

The above is relevant history, and sets a very clear precedent for the type of fence that is acceptable on this site. The perimeter fence proposed in this current application is 500mm lower than the previously approved, and is flanked by planting to soften its impact, so it is submitted that the new fence will also result in "no unacceptable impact on the openness or character of the area", similarly to the taller fence in the previously approved application.

## **Playing Surface**

The planning officer for the previously refused scheme raised concerns that the introduction of the proposed synthetic, dark grey surface together with the raised embankment and high fencing would constitute an alien and visually intrusive element into the rural landscape, and that was one of the reasons for refusal.

The surface of the proposed new arena will be installed to modern standards which are closely regulated by the Government and Environment Agency. These regulations ensure that the sand based surface is environmentally friendly as well as being appropriate for a variety of equestrian uses. The surface will be a mixture of silica sand and stabilising fibres, which will give the appearance of a traditional sand surface, whilst providing support for the horses during fast movement and provide stability in turns.

The existing part of the arena currently has a similar sand based surface, although it wouldn't comply with the modern regulations that were recently tightened in 2021. The old surface will be removed from site in its entirety as part of the works, thus providing a further gain to the environment. The new surface would therefore be considered to be in keeping with the landscape, due to the visual similarities to the surface on the well established existing part of the arena.

The planning officer for the previously approved scheme (ref 12/0926/FUL) described how "a sample of the surface material has been submitted which has the appearance of sand and is of a mid brown colour... it is considered that the proposal itself would now result in no unacceptable impact on the openness or character of the area."

Further to this, this same type of surface was approved on the equestrian track on the Northern part of Ham Polo Club's site under the recent planning application (ref 21/3248/FUL dated 15.07.22), with the planning officer noting in her report that "The materials are suitable in that timber is a traditional material respectful of the heritage sensitivities of the surroundings, while the sand silica mix is required for equestrian use. Therefore the proposed design of the exercise track is considered to preserve the character and appearance of Ham House Conservation Area and preserve the setting of the neighbouring listed buildings. As such no objection is raised to the proposal in this regard".

It is therefore submitted that the new surface successfully and fully addresses the concerns raised in the reasons for refusal from the previous application, given that the previous application was for a synthetic grey surface.

## Heritage

Whilst the pre-application response from the council only briefly mentioned the heritage assets and archaeological potential of the site, a detailed Heritage Statement and Archaeological Desk Based Assessment has been submitted with the planning application, to fully assess the extended sand arena's potential impact.

The report, compiled by specialists AB Heritage, concluded that the proposed development would not be introducing anything into the Conservation Area that is not currently there, as the new sand arena is an extension of the existing. Coupled with the fact that the proposal site is enclosed by mature trees, and that the proposal is a ground level change, it is

considered that there would be No Change to the existing character of the Conservation Area.

If the Council was minded to decide that the extended sand arena would cause harm to the conservation area and its heritage assets, it is submitted that, and backed up by the accompanying heritage statement, any harm caused would be less than substantial. This would be outweighed by the benefit to the local community and polo club by offering an extended provision of equestrian and polo related activities, and therefore in accordance with the National Planning Policy Framework, and Policies LP1 (Local Character) and LP3 (Heritage Assets) of the Local Plan. The benefits to the local community and discussed later in this report.

## **C:** Neighbouring Amenity

Due to the distance from any residential buildings, and the current use of the area for equestrian based activities, the proposals will have no impact on privacy, pollution, visual intrusion, noise and disturbance, and will therefore comply with Policy LP8 (Amenity and Living Conditions) of the Local Plan.

## D: Ecology and Biodiversity

An ecology survey accompanies the planning application from specialists Arbtech, which assesses the potential impact on biodiversity and ecology. Please see the accompanying report from Arbtech for further information and mitigation measures. The aim of the survey was to complete an extended Phase 1 Habitat Survey of the survey area and all land that will be impacted by the proposal, and to determine the presence/likely-absence of badgers on site or the presence of badger setts within a 30m radius of the proposed development works.

The previously refused application (ref 04/3527) was considered by the planning officer to have the potential to be detrimental to nature conservation and protected species, with the planning officer mentioning badgers in particular. The ecology survey submitted as part of this application found that no badger setts were located within a 30m radius of the site's boundary, with no further surveys being deemed necessary due to the negligible foraging resources for badgers on the area impacted by the works.

In addition to the above, it was recommended within the report that planting fruit trees across the wider site would enhance the foraging potential for badgers, in line with the Local Authorities duty under the National Planning Policy Framework, and a condition of this nature would be welcomed by the applicant, should the council be minded to approve the application.

Various other Ecological enhancements, such as bird boxes, hedgehog houses, insect friendly planting and filling in the gappy hedgerows, have been included within the Ecology Report, which accompanies this application, to ensure compliance with Local Plan Policy LP15 - Biodiversity, which again, the applicant would welcome to be secured via planning condition.

It is therefore submitted that the findings and recommendations detailed within the ecology report fully and successfully address the refusal on ecological grounds of the previous application.

## E: Trees

As outlined in the pre-app response there are many trees adjacent to the site, which are covered by statutory protection given their location within Ham House Conservation Area. As was previously mentioned, the width of the extended sand arena has been reduced since the pre-app response in order to ensure no risk to these existing trees.

One of the reasons for refusal on the previous planning application (ref 04/3527) was that the proposal may jeopardise the long term health of the avenue of mature Lime trees along Melancholy Walk. The officer's report stated that *"the all weather polo facility is considered to be too close to the mature lime trees. They are situated within the Conservation Area and are part of an important lime avenue which exists in the area and is the subject of the Ham Avenue Restoration Management Plan. The raising of soil levels will cause asphysiation damage to the roots of the trees, which may cause premature senescence or even death of the trees. These trees are already under pressure from the footpath and bridleway that exists to the west of them. Lime trees are particularly vulnerable to this damage. It is also considered that the raised banking would harm the trees on the eastern side of the all weather facility. Whilst not of such a high amenity value as those to the west, there are several large landscape trees which would be prone to damage following any root disturbance. Further, the raised banks would be likely to prejudice the proposed planting in the Ham Avenues Restoration Plan."* 

The current planning application positively addresses all of the concerns raised in the previous reason for refusal listed above.

Firstly, the extended sand arena is located completely outside of all of the root protection areas described in the Arboricultural Report. To ensure there will be no effect to the trees when the arena is brought back into use and during its construction, a robust Construction Phase Tree Protection Statement and plan is included within the Arboricultural Report, which details areas and methodology of root protection which will be strictly adhered to throughout the works.

Secondly, the existing ground levels to the perimeter of the proposed extended arena will be retained, with no embankments at all, unlike the previously refused scheme. This will ensure that there will be no asphyxiation damage to the roots of the existing trees as discussed in the officers report for 04/3527. Retaining these levels will also ensure that any future restoration work as part of the Ham Avenues Restoration Plan will not be prejudiced.

The current proposals require the removal of a horse chestnut tree on the Eatern side of the extended arena site, as detailed on the proposed plans and Arboricultural Report. This tree has been classified as a C1 and is in poor structural condition. The proposals mitigate against the loss of this tree by planting 6 new Lime Trees (Tilia sp.) to the Eastern edge of the site.

The image below shows an aerial view of the site from back in 1945, and illustrates Ham Polo Club as undeveloped fields. The application site is outlined in red. The green outline to the East of the application site shows linear tree coverage running parallel with the lime trees on Melancholy Walk. This additional avenue of trees has been lost over time. The 6 proposed new lime trees will contribute to restoring part of this historic arboricultural feature which once formed part of the historic setting for Ham House. Such benefits could not otherwise be secured without the delivery of the proposed extended sand arena, and in turn would assist in assimilating the sand arena into its immediate setting.



## F: Flood Risk

As identified earlier in the report, the site is within flood zones 2, 3, 3a and 3b. The majority of the extended sand arena itself will be within flood zone 2, whereas the rest of the site is within flood zone 3. A flood risk assessment by ARK Environmental is included with the planning application submission.

A series of 300mm x 300mm drainage channels are proposed to be excavated from underneath the extended arena and will contain 100mm diameter perforated pipework in order for the extended arena surface to act as a large soakaway. This will ensure that the extended arena is utilised all year round, and will not affect flooding elsewhere, in accordance with Local Plan Policy LP21 Flood Risk and Sustainable Drainage.

The proposed levels of the extended sand arena have been designed to ensure no increase in ground levels at all over the entire application site, in order to ensure that no flood storage is lost as a result of the development, in line with guidance from the Environment Agency.

## **G: Transport**

A Transport Statement has been included with the application which demonstrates that the sand arena would not result in an unmanageable increase to vehicular movement due to the additional activities / events that the extended sand arena would facilitate. The extended sand arena facility will enable additional uses mainly in the winter months when grass is not suitable for polo or riding activities. As such, rather than increasing vehicular travel into the site at peak times, it would balance the usage of the club out over the whole year.

## H: Fire Strategy

A Fire Safety Statement has been included within the application to accord with London Plan Policy D12. The document adds to the robust fire safety strategy of the site as a whole.

#### **Community Use**

As well as traditional Polo matches, Ham Polo Club provides polo lessons and riding lessons on a day to day basis throughout the summer months, with participants predominantly being non members. For example, a study of the club's most recent data from July 2022 shows that 27 riding lessons and 102 polo lessons were undertaken. Riding and Polo Lessons are predominantly on a one on one basis, with the occasional group session. In July 2022 there were 8 group sessions in total, with typically 6 participants per group.

The club currently predominantly undertake these lessons in the summer months, due to ground conditions and safety, as the participants are largely beginners and can be inexperienced riders. In the winter months, numbers are reduced to a handful of lessons across weekends only. The extended sand arena will be able to accommodate these activities, as well as winter polo, throughout the entire year which will clearly be of benefit to the local community, given the use of what will be a first class facility. The extended sand arena will also enable more group sessions, due the perimeter fence and the additional security that it will provide.

Taking July 2022 as a typical month, a simple estimate at the potential numbers is as follows:

Polo Lessons = 102 Riding Lessons = 27 Total = 129 lessons.

Of the 129 lessons, 8 were group sessions, with 6 participants per group = 129-8 + (8x6) = 169 Participants per month

So this gives a reliable estimation of predominantly non member participants of 169 per month. Given that the club currently have full time lessons between April - September, that leaves the 6 months between October - March where the extended arena could facilitate 1014 additional participants per year which would predominantly be to non members.

The reality is that this number could be higher given the arena's ability to enable more group sessions as previously discussed. Even if it assumed that a third of these lessons (38 per month) could be group lessons, that would give a projected monthly community participation number as follows:

Of the 129 lessons, 8 were group sessions, with 6 participants per group = 129-38 + (38x6) = **319 Participants per month** 

This clearly gives a real benefit to the local community, and not just to the members of the polo club.

Further to this, many of the previous Stables and Riding Schools surrounding Richmond Park have been lost over the years, and as such the amount of riding schools and lessons available in the borough are in decline. This is mainly a result of the high resale cost of development sites in the area and they are being sold on to developers to build flats. Most recently Kingston Riding School has moved to a site in Chessington which is over 30 minutes drive away. Ham Polo Club's extended Arena will help to supply riding lessons back to the community and ensure that the availability of equestrian activities to the local community is secured for years to come.

#### University of Roehampton

Ham Polo Club have also approached the University of Roehampton, to inquire about potentially hiring out the extended sand arena, and received the following response:

#### Dear Howard,

We were very pleased to hear about your plans to develop a Polo Arena at Ham Polo Club, especially given our own plans here at Roehampton Sports to set up the University of Roehampton Polo Club which is scheduled to be launched in September this year.

By doing so we aim to open up the sport of Polo to our diverse and vibrant community of over 10,000 students hailing from over 100 different countries from around the world. In doing so giving our students an invaluable experience in participating within a sport that they would otherwise not have had access to or indeed had even considered possible to play.

Our own plans include to eventually go on and become part of the Schools and Universities Polo Association and its proposed South West London Universities League which would include other Higher Education Institutions such as Surrey, Kingston and St Mary's Twickenham.

As a result of which Ham Polo Club and its proposed Polo Area would potentially play a pivotal role in the development of the University of Roehampton Polo Club and in turn the South West London Universities League.

Your vision in wanting to turn Ham Polo Club and its proposed Polo Arena into a sporting centre of excellence and to widen community participation in terms of diversity and inclusivity is only to be commended.

We look forward to developing a partnership with Ham Polo Club for the benefit of students here at Roehampton and bringing Polo back home to Roehampton where it began in the United Kingdom over 120 years ago.

Best regards,

James

*James Ayres Head of Sport and Active Communities*  Sport and Active Communities University of Roehampton London SW12 5PU

The supportive email above emphasises the potential community benefit of the proposed facility in terms of Sports provision, making the sport of Polo available to a much wider audience and participant group, and ensuring the University of Roehampton's inclusion within the proposed South West London Universities League.

#### **Barnfield Riding School**

Ham Polo Club have also approached Barnfield Riding School during a fundraiser at the Polo Club to inquire about potentially hiring out the extended sand arena, and received the following response:

#### Dear Howard,

Following our recent fundraiser at Ham Polo Club I can confirm that BRS would be interested in taking part in further community fundraising events possibly using your planned enlarged arena.

The idea of equestrian events on a suitable surface during the winter and your proposal to hold a jousting competition open to the public at Christmas time to raise funds for BRS and other charities would certainly be of great interest to us.

Hopefully this will also support with maintaining equestrianism as a prominent part of local life and given the location near to Ham House a medieval weekend with horses, tents, costumes and traditional food could be a lovely family friendly annual occasion.

I would once again like to thank you for arranging the fundraising evening last month, the funds raised will make a big difference

Looking forward to seeing you soon. Kind regards,

Patsyanne Rose Chairman BarnField Riding for the disabled

The supportive email above emphasises another community benefit of the proposed facility in terms of the potential to help smaller, local riding schools to further their provision and hold fundraising events at any time of the year.

#### Conclusion

This design and access statement and the accompanying reports respond positively to the advice given at pre-app stage. The size of the sand arena extension has been reduced to alleviate the concerns raised in the pre-app response regarding the possible effects on the existing trees and ecology. Heritage, archaeology, flooding and transport have all also been successfully addressed.

Further to this, the reasons for refusal from the previous planning application from 2004 (ref 04/3527) have been fully and successfully addressed, and this application has been further justified with reference to the previously approved scheme that was never implemented (ref 12/0926/FUL).

If the Council was minded to decide that the extended sand arena would cause harm to the conservation area and its heritage assets, it is submitted that, and backed up by the accompanying heritage statement, any harm caused would be less than substantial. This would be outweighed by the identified benefits to the local community and polo club by offering an extended provision of equestrian and polo related activities, and therefore in accordance with the National Planning Policy Framework, and Policies LP1 and LP3 of the Local Plan.