

Noise and Light Pollution Concerns

- It has been widely reported in the press that padel courts can be highly problematic due to the noise and light pollution they generate. This proposal is particularly inappropriate because the site is located in a residential area, where noisy activities such as this can cause significant disturbance.

This is what it sounds like: <https://www.youtube.com/watch?v=hz9i5pu5-Kc&t=8s>

- The Padel Magazine¹ recommends that clubs in quiet areas should be located no more than 100m to local residents. The Dutch tennis and padel association² recommend that new padel courts be built no closer than 100 metres from residential buildings and should preferably be 160 metres away.
- Government guidelines state that noise levels are a relevant planning consideration. The proposed padel club would be located directly adjacent to residential properties, which will lead to significant noise disturbance. Under **The Environmental Protection Act 1990**³ and **The Control of Pollution Act 1974**⁴, local authorities can take action to address statutory nuisances, including noise that disrupts the enjoyment of residential property.
- Padel courts are particularly noisy, with noise levels potentially reaching around **70-90 dB**, depending on the intensity of the game. This is comparable to the sound of a passing motorcycle or a lawnmower. If the courts are used frequently or during late hours (the proposal includes operation until 23.00), this could cause a significant disturbance to local residents. **WHO guidelines state that daytime noise levels should not exceed 55 dB for outdoor areas where people spend time**⁵, but the noise from these courts is likely to exceed this, making it an unacceptable noise level for the area.
- In addition, these padel courts are to be floodlit, which will contribute to light pollution especially in a residential area where the light levels are currently low at night. Floodlighting in this context would be highly disruptive to local residents, the surrounding environment and wildlife.

To mitigate these issues, it is generally accepted that padel courts should be a minimum of 100 metres from residential property, but under this proposal the padel courts are immediately adjacent to housing. Floodlighting should not be allowed as it would cause a nuisance to the local community and contribute to environmental degradation.

¹ <https://padel-magazine.co.uk/le-padel-face-aux-nuisances-sonores-la-fft-publie-une-etude-technique/>

² <https://sportsfields.info/padel-and-noise-pollution-guidelines/>

³ <https://www.legislation.gov.uk/ukpga/1990/43/contents>

⁴ <https://www.legislation.gov.uk/ukpga/1974/40>

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https://www.ioa.org.uk/system/files/proceedings/d_fiumicelli_n_triner_world_health_organisation_who_guidelines_for_community_noise_-_a_help_or_a_hin.pdf

Failure to Protect Metropolitan Open Land (MOL)

- **Metropolitan Open Land (MOL)**⁶, is supposed to offer the highest level of protection against inappropriate development. According to **Policy OS(a) of the Local Plan**, development in MOL must be ancillary and essential to the open character of the land. The design, scale, and massing of this proposal are visually intrusive and would have a detrimental impact on the nature of the area, particularly due to the floodlighting and noise pollution.
- **Policy OS2** further protects MOL by stating that its open character should be maintained, and development should only be allowed in very special circumstances. The proposal to build on a large portion of MOL for padel courts contradicts these protections, and therefore, should be refused.
- Additionally, **London Plan Policy 7.17**⁷ gives the strongest protection to MOL, and the presumption is against built development on MOL unless very special circumstances are demonstrated. This proposal, which essentially concretes over MOL, does not meet those requirements.
- Similar proposals in other locations have also proven problematic. For example, in Brighton, the local council issued noise abatement notices due to complaints from residents. In Blackheath, the proposed development involves 8 courts, which is a large number likely to generate excessive noise. Additionally, there are plans to operate these courts until 23.00, further exacerbating the disturbance. Other examples of problematic cases include Hampstead Garden Suburb, Winchester, and Weybridge.

This site is designated as Metropolitan Open Land (MOL).⁸ The development of padel courts and a clubhouse, which would involve the concreting over of a significant portion of this land, is inconsistent with the requirement to maintain its openness. Commercial development on MOL is generally prohibited to preserve the land's open character.

Opening Hours

- The opening hours are **6am until 11pm, 7 days a week. That makes 17 hours of constant noise a day, weekdays and weekends.** This is completely unacceptable in a Conservation residential area where no loud work is permitted to take place after 6pm. The plot TGL161151 might not count as being in the Conservation area, but it is located

⁶ <https://www.data.gov.uk/dataset/1b19f05f-af28-4e0b-b923-fa5c5d6ae39e/metropolitan-open-land-in-the-royal-borough-of-kingston-upon-thames3> See also: <https://apps.london.gov.uk/planning/> for map of the land designated as MOL and a further explainer here: <https://www.gigl.org.uk/our-data-holdings/designated-sites/metropolitan-open-land-and-greenbelt/>

⁷ <https://www.london.gov.uk/programmes-strategies/planning/london-plan/past-versions-and-alterations-london-plan/london-plan-2016/london-plan-chapter-seven-londons-living-spac-19>

⁸ <https://apps.london.gov.uk/planning/>

adjacent to the Conservation area and close to residential buildings in the area.⁹ The sound travels through the conservation area.

- Access to the plot is through a conservation area, therefore, the policies and constraints of the Conservation area must apply in this case.
- The rules and regulations of Blackheath Cator Estate Residents, within whose boundaries the plot lies, prohibits all commercial works outside of 8am and 6pm on weekdays only.

It is unacceptable in a quiet residential area where residents have to comply with noise restrictions to have a commercial enterprise open 17 hours a day with deliveries and refuse collection and staff coming and going on top of this.

Incompatibility with the Conservation Area and Listed Buildings

- Although the development is located just outside the conservation area, it directly abuts it. The opposite side of the road is within the conservation area, and includes Grade II Listed Buildings at 101 and 103 Blackheath Park.
- **The courts have a canvas shell and reach 10m in height.** That is higher than virtually all surrounding residential homes. It is not at all in keeping with the current buildings and properties. It will, to be blunt, stand out like the proverbial sore thumb.
- According to **Royal Greenwich's Local Plan Core Strategy**, specifically **Policy DH(h)**¹⁰ regarding Conservation Areas, planning permission will only be granted for proposals which pay special attention to preserving or enhancing the character or appearance of the Conservation Area. The local scale, the established pattern of development and landscape, building form and materials will all be taken into account. Development on sites in the vicinity of a Conservation Area and which would have a visual effect on it character or appearance should respect the setting of that area.
- Furthermore, **Policy DH(i)**¹¹ regarding Statutory Listed Buildings states that proposals which detract from the setting of listed buildings will be resisted. This development would clearly detract from the setting and proportions of the listed buildings, failing to meet this requirement.

⁹ See outline of map here:

https://www.royalgreenwich.gov.uk/downloads/file/2480/blackheath_conservation_area_map

¹⁰

[file:///Users/trevorjpugh/Downloads/Royal Greenwich Local Plan Core Strategy with Detailed Policies_main.pdf](file:///Users/trevorjpugh/Downloads/Royal%20Greenwich%20Local%20Plan%20Core%20Strategy%20with%20Detailed%20Policies_main.pdf) Page 108

¹¹

[file:///Users/trevorjpugh/Downloads/Royal Greenwich Local Plan Core Strategy with Detailed Policies_main.pdf](file:///Users/trevorjpugh/Downloads/Royal%20Greenwich%20Local%20Plan%20Core%20Strategy%20with%20Detailed%20Policies_main.pdf) Page 109

In this case, the proposed development fails to preserve or enhance the character of the conservation area. Quite the opposite, it would cause harm to the area's visual and historic setting.

Trees and ecological concerns

- Trees need to be removed to build the padel courts. In relation to trees, the application is unclear and confused.
- The applicant's Arboricultural Impact Assessment (AIA)¹² states that 3 Category B and 3 Category C trees will be removed within the site boundary, and that all other trees can be retained with appropriate protection measures. However, the Pre-Construction Schedule of Tree Works in the Arboricultural Method Statement (AMS) mentions the removal of 3 tree groups and 8 individual trees, while the AIA's Tree Survey Schedule lists the removal of 15 individual trees and 3 groups. These discrepancies suggest confusion between the two documents and contradict the statement in the AIA.
- It is possible that the trees planned for removal are not on the site or owned by the applicant but may belong to BCER or the landowner to the south, making them outside the applicant's control.
- Complicating matters further, the tree location diagrams in both the AIA and AMS are poorly marked, with symbols instead of tree numbers. This makes it impossible to match the trees listed in the schedule with their actual locations.
- The planning application makes no mention of the impact on bats but does state that the whole of the proposed site has potential locations bat roosts, but the suitability is negligible. Every year we see bats flying between the gardens of Blackheath Park and Morden Road. Bats are very significantly affected by both light and noise pollution. Artificial Light at Night (ALAN) can disrupt bats' natural nocturnal behaviour, delaying or preventing their emergence from roosts, reducing foraging time, and potentially leading to them abandoning roosts. Natural England has standing advice for bats. It is a material planning consideration for local planning authorities.¹³ We would like to draw the planning departments attention to Government Policy "Bats: advice for planning decisions."

There needs to be clarity as to which trees need to be removed and who owns those trees. The impact on the wildlife of the area also needs to be considered as the courts will disrupt the local bat colonies.

¹² https://planning.royalgreenwich.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal= GRNW_DCAPR_123655

¹³ <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>

Traffic and Parking

- Morden Road and Blackheath Park are quiet residential streets with traffic-controlled gates. There is no other access to the site except through the Cator Estate streets. Unauthorised access to the Cator Estate is prohibited. The application has parking for 17 cars, though at least two can be used by staff. The 8 courts can accommodate 32 players at any given time, plus any players showering or waiting their turn. At a peak change over time there could be a peak of 64 cars. There is clearly a significant disparity between the number of vehicles expected and the allowed parking space. Parking on Blackheath Park and Morden Road is strictly controlled, and the applicant will be unable to gain permission to park. The nearest public is 0.6 miles of the of the premises.
- There will be deliveries and industrial waste removal outside of the opening hours as well as the arrival and departure of the staff.
- It is highly likely that the majority of people attending will come by car, especially early in the morning and late at night when public transport is even less available. Times the estate is traditionally very quiet. Despite the provision of cycle bays, the site is a significant distance from public transport.
- Given the opening time, local residents near the site will be experience car doors being slammed from early in the morning, to very late at night. These are private roads, jointly paid for by the residents of the Cator Estate.
- We pay for all wear & tear, and any major resurfacing works. They are not designed for heavy usage.
- People will arrive before their game, deliveries will be made, staff will need to open and close up. There is encouragement in the Padium brochure to stay and drink. It is very likely the disruption will be well beyond the 17 hours the matches are available to be booked. It is easily conceivable that the noise will run from 5am to midnight. Every day.

The estate will become a high traffic neighbourhood whilst the surrounding areas are converted to low traffic neighbourhoods. Due to the distance from public transport people will be encouraged to drive. Greenwich has implemented traffic management schemes¹⁴ aimed at reducing congestion, improving air quality, and making roads safer. This scheme does the exact opposite of this.

¹⁴ See for example: <https://www.royalgreenwich.gov.uk/news/2024/west-and-east-greenwich-traffic-management-scheme-update-were-making-changes-based-your>