

TO: PLANNING & REGULATORY COMMITTEE **DATE:** 7 DECEMBER 2016
BY: PLANNING DEVELOPMENT TEAM MANAGER
DISTRICT(S) GUILDFORD BOROUGH COUNCIL **ELECTORAL DIVISION(S):**
Horsleys
Mr. Barker

PURPOSE: FOR DECISION **GRID REF:** 509522 155780

TITLE: WASTE MANAGEMENT APPLICATION REF. GU14/P/01718

SUMMARY REPORT

The Drift Golf Club, The Drift, East Horsley, Surrey, KT24 5HD.

The importation, deposit and engineering of 54,878m³ (some 87,805 tonnes) of inert waste materials on 3.45ha of land within the existing golf course facility so as to remodel the existing practice ground outfield and to construct a new 11,000m³ irrigation storage lake as part of a strategy to provide sustainable rainwater harvesting scheme; create a new outdoor short game practice and teaching facility including a putting and chipping green; provide a new 769m² building with 30 covered practice bays and associated storage, ablution, lavatory, teaching and administrative facilities for the benefit of the general public, schools, the junior academy and club members; with associated ecological improvements over a period of 9 months and involving some 6,097 HGV trips or 12,194 HGV movements (based on a conversion rate of 13m³ (9m³ compacted) per 20 tonne HGV) on a one way circular route at a maximum of 33 HGV trips (66 HGV movements) per day, with temporary passing bays and traffic management measures along The Drift.

The Drift Golf Club lies within the Metropolitan Green Belt and occupies some 56 hectares. It comprises a par 73 18-hole course which is about 5,900m (5.9km) long situated within mature woodland. There is also an existing large clubhouse and maintenance building, a large hard-surface car park, a raised concrete teeing area with 18 artificial mats, 7 grassed teeing areas, and a practice putting green with a surrounding picket fence. The golf course, club house and car park are well-contained and screened by surrounding woodland. The application site area comprises some 3.45ha of land within the larger landholding.

Presently the golf club has 3 teaching staff and is accredited for its beginner and junior friendly facilities. The applicant seeks to create an 'Academy' environment that would enable high quality teaching in a modern, comfortable and safe environment that is usable throughout the year. The golf club is currently involved with schools in West Horsley, Leatherhead, and Cranleigh providing tuition and coaching to their respective pupils. The development would allow the golf club to actively engage as many schools and colleges as possible in the local area as advocated by the Golf Foundation. The golf club currently hosts the annual Professional Golfers Association Southern Open. The development would safeguard and promote the golf club as a venue for similar prestigious events. Despite the hard work over the years developing the coaching aspects of the golf club, the existing facilities do not meet the required modern standards. This is essentially due to a combination of severe drainage problems of the practice range outfield and the lack of teaching infrastructure including covered practice bays and suitable indoor space which are essential for an academy to flourish. The design of the proposed development has been endorsed by the English Golf Union and the Surrey Golf Union.

In identifying a need to significantly improve its practice and teaching facilities the applicant has recognised that by employing an appropriate design strategy the golf club can become self-sufficient in terms of water supply for irrigation purposes. The applicant considers this vital to the sustainability of the golf club in the context of increasing environmental and regulatory pressures on golf courses to be less reliant on mains and groundwater. Accordingly, the applicant intends to engineer a practice ground outfield which would serve as an exciting practice area and a surface water run-off 'harvesting zone'. Surface water collected from field drains within the outfield will be fed back to the new irrigation lake for storage and later use. When needed water from the new lake would be pumped back to the existing irrigation pond before being distributed by an irrigation system. The new irrigation lake has been designed by the applicant to accommodate the potential yield of the 'harvesting zone' and a total of 11,000m³ of water. This figure together with the 8,000m³ of water that is permitted to be drawn from existing water bodies would make the golf club self-sufficient in irrigation water supply.

In order to achieve the engineering part of the proposal the applicant would import 54,878m³ (87,805 tonnes) of inert waste material to the site by road using HGVs. The applicant intends completing the development within a period of 9 months. The development is to involve about 12,194 HGV movements in total. This equates to some 33 HGV trips (66 HGV movements) per working day over the period. The development would take place from 0700 until 1630 hours Monday to Friday with no working over week-ends or holidays. Importation of waste by HGVs would cease between 0800 and 0900 hours and by 1430 hours Monday to Friday to avoid peak traffic.

In accessing the site HGVs would leave the A3 via the Cobham Interchange and precede down the A245, into Downside Bridge Road and Downside Road, along Horsley Road, Forest Road and then into the eastern end of The Drift from which the golf course is accessed. Upon leaving the application site HGVs would use the The Drift to leave via its western side on to the B2039 and Ockham Road North which in turn connects to the A3 at the Ripley/Wisley by-pass. To facilitate the passing of HGVs and other traffic along The Drift, from which the golf course is presently accessed, temporary passing bays are proposed at key intervals. These temporary passing bays generally match the locations of existing informal passing bays along The Drift. All temporary passing bays are to be reinstated upon completion of the development. It is also proposed to install temporary two-way traffic lights at the pinch point located where Blue Ride Cottage and North Forest Lodge face each other at the western end of The Drift and where there is insufficient space to introduce a temporary passing bay and visibility is poor. These temporary lights would be operational during the proposed hours of work so as to minimise traffic conflict in the vicinity of the dwellings. A series of temporary and appropriate warning signs would also be erected along The Drift. An over run strip would also be required for HGVs on a small section of grass verge on the southern corner where The Drift meets Forest Road.

The development would result in the loss of some 28,000m² of amenity grassland; about 1,800m² of ruderal vegetation; and 2 trees outside of any ancient woodland one of which is dead and the other in poor condition. Conversely, the development would provide for 21,000m² of species-rich semi improved acid grassland; 3,975m² of wildflower/rough grassland; 2,697m² of woodland planting; some 3,000m² of additional open standing water; 63m² of wetland habitat; and 163m² of pond planting.

The applicant anticipates that the development would result in the golf club employing two new full-time professional teaching staff. It is also projected that the development would result in a 9.35% and 11.42% increase in the use of the practice ground outfield during the summer and winter months respectively. This equates to about 4 - 12 additional users per day and about 28 - 84 additional users per month.

Elmbridge Borough Council, Guildford Borough Council and all Parish Councils and amenity societies have objected to the development. Additionally, the County Planning Authority (CPA) has received 277 objections to the development from members of the public. A significant majority of these objections relate to the perceived impact increased HGV traffic would have on

the local highway network, local amenity, heritage assets and the local environment. Concerns have also been raised in respect of the impact the proposed building would have on visual amenity and the openness of the Green Belt.

Although Officers appreciate the concerns expressed by interested parties about increased HGV movements on local roads, the advice from the County Highway Authority is that the development would not have a severe impact (the test laid down by the National Planning Policy Framework). This on the basis that 33 HGVs per day for the duration of the development would not significantly increase existing traffic flows and that the impact of those HGVs can be suitably mitigated by way of the traffic mitigation measures proposed (temporary passing bays, traffic lights and signage on The Drift) and limiting HGV movements to between the hours of 0700 to 0800 and 0900 to 1430 Monday to Friday with no weekend movements. Conditions would also be imposed on any permission granted requiring the applicant to survey the condition of The Drift prior to and after the development and make good any damage caused to the same as a result of HGVs associated with the development.

In all other technical respects advice received from statutory consultees is that there are no grounds to refuse planning permission on the basis of air quality, noise, landscape and visual impact, heritage assets, flooding, and ecology subject to a range of conditions. The development seeks to remedy the poor drainage characteristics of the existing practice range, sever the golf course's reliance on potable water for irrigation purposes by implementing a sustainable rainwater harvesting scheme, improve the golf course's existing teaching/practice facilities and ascetic and ecological value. In reaching their recommendation Officers have also had regard to the wider environmental and economic benefits of putting some 87,000 tonnes of waste to a beneficial use. Officers consider that together these factors amount to the 'very special circumstances' needed to clearly outweigh the harm arising out of inappropriateness, the moderate loss of openness through the scale of the building, the temporary increase in traffic giving rise to limited adverse impact on affected roads and less than substantial harm to listed buildings on The Drift.

The recommendation is to GRANT planning permission Ref. GU/14/P/01718 subject to a s278 agreement and conditions.

APPLICATION DETAILS

Applicant

The Drift Golf Club

Date application valid

4 September 2014

Period for Determination

14 December 2016

Amending Documents

Letter dated 22 June 2016 from Weller Designs Ltd.
 Letter dated 14 October 2015 from Ramboll Environ
 Environmental Statement dated 6 June 2016
 Environmental Statement Non-Technical Summary dated 6 June 2016
 Background Ecological Data Search dated February 2013 (Appendix A)
 Ecological Impact Assessment dated 6 May 2016 (Appendix A)
 Heritage Assessment dated June 2016 (Appendix B)
 Landscape and Visual Impact Assessment dated 6 June 20151 (Appendix C)
 Noise Statement Ref. 813/2 Rev 2 dated June 2016 (Appendix D)

Temporary Construction Access Scoping Report Ref. G19172 Rev. B dated 28 November 2012 (Appendix E)
 Addendum Report Ref. G19172/AR dated 13 March 2013 (Appendix E)
 Transport Assessment Scoping Note Ref. G19172/YB dated 27 February 2014 (Appendix E)
 Addendum Transport Assessment Scoping Note Ref. YB/G19172 dated April 2014 (Appendix E)
 Addendum Transport Assessment Scoping Note Ref. YB/G19172 dated April 2014 – Appendix K – 7 Day Traffic Count (Appendix E)
 Addendum to Planning Application Ref. G19172 dated May 2015 (Appendix E)
 Cobham Route Ref. G19172 dated June 2016 (Appendix E)
 Designers Response to Stage 1 Road Safety Audit Ref. G19172 dated June 2016 (Appendix E)
 Letter dated 15 June 2016 from Thomasons (Appendix E)
 Flood Risk Assessment for New Structure and Drainage Improvements Report Ref. K0341/1 Rev 3 dated June 2016 (Appendix F)
 Waste Statement dated June 2016 (Appendix G)
 Stakeholder Involvement Version 1 dated 20 June 2014 (Appendix H)
 Revised Tree Survey, Arboricultural Impact Assessment, Arboricultural Method Statement Ref. CC/1168 AR2627 dated 27 June 2016 (Appendix I)
 Design and Access Statement Version 4 dated 6 June 2016 (Appendix J)
 Long Term Landscape Management Plan Version 3 dated June 2016 (Appendix K)
 Dust Impact Assessment Ref. UK18-21258 dated June 2016 (Appendix L)
 Safeguarding the Ancient Woodland Verge along The Drift Road Version 3 dated 1 June 2016 (Appendix M)
 Drawing Ref. 551.01 Rev B – Existing Site Survey dated 2 February 2015
 Drawing Ref. 551.02 Rev C – Grading Plan dated 6 May 2016
 Drawing Ref. 551.03a Rev D – Landscape Plan dated 6 June 2016
 Drawing Ref. 551.03b Rev B – Landscape Plan dated 6 June 2016
 Drawing Ref. 551.04 Rev C – Cross Sections dated 6 June 2016
 Drawing Ref. 551.06 Rev C – Range Building dated 6 June 2016
 Drawing Ref. 551.07 Rev C – Range Building Elevations dated 6 June 2016
 Drawing Ref. 551.08 Rev C – Drainage and Water Harvesting Plan dated 6 June 2016
 Drawing Ref. 551.09 Rev B – Contractors Work Plan dated 6 June 2016
 Drawing Ref. 551.10 – Application Boundary Plan
 Drawing Ref. 551.15 – Cross Sections Showing Relative Adjustments to Profile following SCC Comments dated 29 April 2016
 Drawing Ref. 551.88 – Survey of The Drift Bay 3 dated 8 March 2015
 Drawing Ref. 551.88a – Location of Warning Signs dated 8 March 2015
 Drawing Ref. 551.87 – Survey of The Drift Bays 1 and 2 dated 8 March 2015
 Drawing Ref. 551.89 – Survey of The Drift Bay 4 dated 8 March 2015
 Drawing Ref. 551.90 – Survey of The Drift Bay 5 dated 8 March 2015
 Drawing Ref. 551.91 – Survey of The Drift Over Run Strip dated 8 March 2015
 Drawing Ref. TPP-CC/1168 AR2627 Rev 2 – Tree Protection Plan 1 of 2 dated 27 June 2015
 Drawing Ref. TPP-CC/1168 AR2627 Rev 2 – Tree Protection Plan 2 of 2 dated 27 June 2016

SUMMARY OF PLANNING ISSUES

This section identifies and summarises the main planning issues in the report. The full text should be considered before the meeting.

	Is this aspect of the proposal in accordance with the development plan?	Paragraphs in the report where this has been discussed
Sustainable Waste Management	Yes	89 - 113
Highways, Traffic and Access	Yes	114 - 137

Air Quality and Noise	Yes	138 - 149
Flood Risk	Yes	150 - 157
Landscape and Visual Impact	Yes	158 - 173
Ecology	Yes	174 - 187
Heritage Assets	Yes	188 - 200
Metropolitan Green Belt	No	201 - 224

ILLUSTRATIVE MATERIAL

Site Plan

Drawing: Proposed woodland planting
 Drawing: Proposed passing places along The Drift
 Drawing: Verge Protection Measures
 Drawing Ref. 551.03a Rev D – Landscape Plan dated 6 June 2016
 Drawing Ref. 551.03b Rev B – Landscape Plan dated 6 June 2016
 Drawing Ref. 551.07 Rev C – Range Building Elevations dated 6 June 2016
 Drawing Ref. 551.08 Rev C – Drainage and Water Harvesting Plan dated 6 June 2016
 Drawing Ref. 551.09 Rev B – Contractors Work Plan dated 6 June 2016

Aerial Photographs

Aerial 1 – The Drift Golf Club, The Drift, East Horsley, Surrey
 Aerial 2 – The Drift Golf Club, The Drift, East Horsley, Surrey

Site Photographs

Existing and proposed montages
 Existing passing places along The Drift
 Existing access to the golf club via The Drift
 Existing practice facilities
 Existing car park and club house
 Northern boundary of practice range
 Present condition of practice range

BACKGROUND

Site Description

1. The Drift Golf Club lies within the Metropolitan Green Belt and occupies some 56 hectares. The golf course was created in 1975 by Sir Henry Cotton and architect Robert Sandow. It comprises a par 73 18-hole course which is about 5,900m (5.9km) long situated within mature woodland. There is also an existing large clubhouse and maintenance building, a large hard-surface car park, a raised concrete teeing area with 18 artificial mats, 7 grassed teeing areas, and a practice putting green with a surrounding picket fence. The golf course, club house and car park are well-contained and screened by surrounding woodland.

2. The golf club is located in a rural area to the north of East Horsley village, southeast of Ockham, and west of Effingham. The application site area (the site) comprises some 3.45ha of land within the larger landholding.
3. The site is to be accessed via the The Drift road which is largely a single-track unclassified road. It also forms part of public byway No. 516. There is a toad tunnel and a culvert under the road and the maximum loading on these are unclear.
4. To the west, The Drift road connects with Ockham Road North (B2039) which links the villages of West Horsley and Ockham. To the east, The Drift road connects with Forest Road to the southwest of Effingham Junction which in turn links the villages of East Horsley, Effingham, Downside and Cobham.
5. Public footpath Nos. 559, 561 and 562 are located to the west of the golf club. Footpath No. 559 crosses The Drift road to form footpath No. 561 whilst footpath No. 562, which runs from The Highlands road, ends at The Drift road. Footpath No. 25 runs east west to the north of the application site at about 250m.
6. The closest houses to the application site are located beyond the eastern extent of the golf course beyond a series of tree belts and west of Forest Road at about 300m, to the southwest (The Highlands) of the golf course beyond The Drift and the Forest SNCI at about 350m, to the north (Blackmoor Farm) at some 480m, north east (Barnsthorns) at about 480m, and the south west (Blue Ride Cottage and North Forest Lodge) beyond 350 along The Drift.
7. The site is situated within the Ockham and Clandon Wooded Rolling Claylands landscape character area as defined within Guildford Borough Council's Landscape Character Assessment 2006. The key characteristics of this landscape are its subtle rolling topography criss-crossed by small streams and drainage channels and dotted ponds. Coupled with its underlying heavy London Clay soil this is an area that may be subject to land-drainage problems and summer soil cracking as part of its natural character. Accordingly, the landscape character assessment highlights the area as being susceptible to seasonal weather variations and variously in flood or running dry.
8. The site is not covered by any national or higher-level nature conservation designations. However, the Ockham & Wisley Commons Site of Special Scientific Interest (SSSI), which forms part of the Thames Basin Heaths Special Protection Area (SPA), is located some 2.3km to the northwest. The Bookham Commons SSSI lies some 2.5km to the east of the site, whilst the Mole Gap to Reigate Escarpment SSSI, which is also designated a Special Area of Conservation (SAC), is located some 5.7km to the east of the site. The site forms part of the Drift Golf Club and the Forest Site of Nature Conservation Importance (SNCI). There are three further SNCI's located within some 2km of the site - the Lollesworth Wood SNCI (some 1.2km southwest), Riding's Wood SNCI (some 1.6km south) and Thornet Wood SNCI (some 1.9km southeast).
9. The wider landholding of the golf club includes extensive areas of Ancient Semi Natural Woodland some of which adjoins the site and The Drift. The section of the Drift Golf Club and the Forest SNCI to the south of The Drift road is also classed as a local nature reserve. This nature reserve, which carries regional importance for its populations of amphibians including Great Crested Newts, is owned by East Horsley Parish Council and is managed by the Surrey Wildlife Trust.
10. The site is not covered by any national or local level landscape designations. The Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Surrey Area of Great Landscape Value (AGLV) are both located some 3km to the south.

11. The site is located on land with the lowest probability of flooding i.e. Flood Zone 1 and where the water table is high.
12. The site is not covered by any national level archaeological or historical heritage designations. There are no points listed on the Surrey Historic Environment Record (HER) located within or within close proximity to the site. A Scheduled Ancient Monument (SAM) 'Medieval moated site and fishpond' (English Heritage List ID 1013011) is located some 1.3km to the southeast. The closest Registered Park & Garden to the site is the Grade II Listed Hatchlands (English Heritage List ID 1001697) which is located some 3km southwest. There are three Grade II Listed Buildings located at the western end of The Drift - 'Blue Ride Cottage' (English Heritage List ID 1029408), 'North Forest Lodge' (English Heritage List ID 1029407), and 'Blue Ryde Cottage' (English Heritage List ID 1029403). These dwellings are over 500m from the entrance to the golf course. The Ockham Conservation Area is located some 1.7km to the northwest of site.
13. Along the proposed route for construction vehicles¹ there are three Conservation Areas and a number of Listed Buildings. The Cobham Conservation Area and the Cobham Plough Corner Conservation Area both extend to include part of Downside Bridge Road whilst the Downside Village Conservation Area extends to include part of Downside Road. The route for construction vehicles is within 100m of the Cobham High Street Air Quality Management Area (AQMA).
14. Where Downside Bridge Road meets Church Street, the Grade II Listed St Andrew's Church (English Heritage List ID 1188115) is located on the eastern side of Downside Bridge Road with the Grade II Listed Pyrports (English Heritage List ID 1030209) being opposite this building on the western side of the road. Further to the south the Grade II Listed Cobham Park Woodyard and Brewhouse (English Heritage List ID 1030212) is located on the eastern side of Downside Road. The Grade II Listed St Matthews Church of England First School (English Heritage List ID 1030052) is located on the corner of Downside Road and Downside Common Road.

Planning History

15. The contemporary planning history of the golf club is provided in the table below:

Reference	Description	Decision Date	Decision
12/P/00295	Water storage tank for irrigation system and replacement pump house	April 2012	Consent granted
09/P/01922	Creation of a water storage lake to provide irrigation water for the golf course	January 2010	Consent granted
08/P/01843	Provision of a water storage lake to provide irrigation water for the golf course	December 2008	Consent refused
00/P/02033	Display of two non-illuminated brick entrance signs	December 2000	Consent granted
94/P/01344	Renewal of planning permission 89/P/1681 dated 09/01/90 for internal	December 1994	Consent granted

¹ See paragraph 23 below

	refurbishment of existing clubhouse with new kitchen extension and new restaurant and extension to existing terrace		
94/P/00358	Erection of a green keepers store to replace previous building destroyed by fire	May 1994	Consent granted
89/P/01681	Internal refurbishment of existing clubhouse with new kitchen extension and new restaurant and extension to existing terrace	January 1990	Consent granted

THE PROPOSAL

16. The development is described by the applicant as “the importation, deposit and engineering of 54,878m³ (some 87,805 tonnes) of inert waste materials on 3.45ha of land within the existing golf course facility so as to remodel the existing practice ground outfield and to construct a new 11,000m³ irrigation storage lake as part of a strategy to provide sustainable rainwater harvesting scheme; create a new outdoor short game practice and teaching facility including a putting and chipping green; provide a new 769m² building with 30 covered practice bays and associated storage, ablution, lavatory, teaching and administrative facilities for the benefit of the general public, schools, the junior academy and club members; with associated ecological improvements over a period of 9 months and involving some 6,097 HGV trips or 12,194 HGV movements (based on a conversion rate of 13m³ (9m³ compacted) per 20 tonne HGV) on a one way circular route at a maximum of 33 HGV trips (66 HGV movements) per day, with temporary passing bays and traffic management measures along The Drift”.
17. At the time of submission in 2014 the proposal sought to facilitate the development through the importation of some 79,815m³ (127,704 tonnes) of inert waste material and by 9,311 HGV trips (18,622 HGV movements), equating to 50 HGV trips (100 HGV movements) per day over a period of 9 months. Accordingly, the volume of inert waste to be imported is now about 31% less than originally proposed and HGV trips have been reduced by some 34%.
18. The development comprises an engineering operation and the construction of a building in the Green Belt. The engineering operation² would involve the remodelling of the existing practice ground outfield, construction of an accompanying water storage lake, and creation of a new short game academy. The building would amount to 30 covered practice bays and associated rooms totalling 769m² of internal floor space with a maximum height of the building under 4m. Whilst the development involves both County and District/Borough matters the application is one that is considered, as a matter of substance, to be a County waste matter and therefore SCC is the determining authority.
19. Surrey has a strong golfing tradition and historical links with The Professional Golfers Association (PGA). In 1926, Wentworth Club hosted the forerunner to the current Ryder Cup and also hosted the 1953 matches³.
20. The need for the development is explained in Section 4 of the applicant’s Design and Access Statement dated June 2016. Presently the golf club has 3 teaching staff⁴ and is

² Facilitated by a mini-digger, a bulldozer, and a 360° excavator

³ [http://www.pga.info/regions/england-\(south\)/counties/surrey.aspx](http://www.pga.info/regions/england-(south)/counties/surrey.aspx)

accredited for its beginner and junior friendly facilities. The applicant seeks to create an 'Academy' environment that would enable high quality teaching in a modern, comfortable and safe environment that is usable throughout the year. The golf club is currently involved with schools in West Horsley⁵, Leatherhead⁶, and Cranleigh⁷ providing tuition and coaching to their respective pupils. The development would allow the golf club to actively engage as many schools and colleges as possible in the local area as advocated by the Golf Foundation⁸. The golf club currently hosts the annual Professional Golfers Association Southern Open. The development would safeguard and promote the golf club as a venue for similar prestigious events. Despite the hard work over the years developing the coaching aspects of the golf club, the existing facilities do not meet the required modern standards. This is essentially due to a combination of severe drainage problems of the practice range outfield and the lack of teaching infrastructure including covered practice bays and suitable indoor space which are essential for an academy to flourish. The design of the proposed development has been endorsed by the English Golf Union and the Surrey Golf Union.

21. In order to achieve the engineering part of the proposal the applicant would import 54,878m³ (87,805 tonnes) of inert waste material to the site by road using HGVs. The applicant intends completing the development within a period of 9 months⁹. The development is to involve about 12,194 HGV movements¹⁰ in total. This equates to some 33 HGV trips (66 HGV movements) per working day over the period.
22. The development would take place from 0700 until 1630 hours Monday to Friday with no working over week-ends or holidays. Importation of waste by HGVs would cease between 0800 and 0900 hours and by 1430 hours Monday to Friday to avoid peak traffic.
23. In accessing the site HGVs would leave the A3 via the Cobham Interchange and precede down the A245, into Downside Bridge Road and Downside Road, along Horsley Road, Forest Road and then into the eastern end of The Drift from which the golf course is accessed. Upon leaving the application site HGVs would use the The Drift to leave via its western side on to the B2039 and Ockham Road North which in turn connects to the A3 at the Ripley/Wisley by-pass.
24. To facilitate the passing of HGVs and other traffic along The Drift temporary passing bays are proposed at key intervals as shown in Appendix B of Addendum to Planning Application Ref. G19172 dated May 2015. These temporary passing bays generally match the locations of existing informal passing bays along The Drift. All temporary passing bays are to be reinstated upon completion of the development.
25. It is also proposed to install temporary two-way traffic lights at the pinch point located where Blue Ride Cottage and North Forest Lodge face each other at the western end of The Drift and where there is insufficient space to introduce a temporary passing bay and visibility is poor¹¹. These temporary lights would be operational during the proposed hours of work so as to minimise traffic conflict in the vicinity of the dwellings. A series of temporary and appropriate warning signs would also be erected along The Drift in accordance with Drawing Ref. 551.88a – Location of Warning Signs dated 8 March 2015. An over run strip would also be required for HGVs on a small section of grass verge on the southern corner where The Drift meets Forest Road as per Drawing Ref. 551.91 – Survey

⁴ One of which was involved with delivered teaching and coaching to Tour players including Ryder Cup player Paul Casey

⁵ Cranmore School

⁶ Downsend School

⁷ Cranleigh School

⁸ <http://www.golf-foundation.org/>

⁹ Building construction works to commence between 16 and 20 weeks prior to completion of engineering operations

¹⁰ Two movements equates to a single HGV entering the golf course site and the same HGV leaving the site

¹¹ See Appendix B of Addendum to Planning Application Ref. G19172 dated May 2015 (Appendix E to Environmental Statement dated June 2016)

of The Drift Over Run Strip dated 8 March 2015. This strip to be reinstated on completion of the development.

26. No new access/egress point to the golf club would be constructed. All construction traffic will enter and egress the application site via the main entrance to the golf club and then follow routes to a temporary contractor compound as illustrated on Drawing Ref. 551.09 Rev B – Contractors Work Plan dated 6 June 2016.
27. The temporary compound is to be established north of the existing club house and within the existing car park to facilitate the proposed development. It would be used primarily for the holding of machinery when not in use and for the storage of materials required for the remodelling and construction works. It would accommodate a single 'portacabin' to provide office, dining, rest and washing facilities. A wheel wash would also be located within the compound together with temporary parking for site operatives.
28. A 15m buffer zone will be put in place between the edge of ancient woodland and the practice ground outfield in accordance with advice from the Woodland Trust¹² and Natural England's standing advice¹³. This buffer zone would exclude any construction work or vehicles and be demarcated by way of temporary Heras fencing in accordance with BS 5837:2012¹⁴ as shown on Drawings Ref. TPP-CC/1168 AR2627 Rev 2 – Tree Protection Plan 1 of 2 dated 27 June 2015 and TPP-CC/1168 AR2627 Rev 2 – Tree Protection Plan 2 of 2 dated 27 June 2016. The applicant has provided a Long Term Landscape Management Plan as part of the proposal.
29. The applicant anticipates 3 construction operatives working on the practice ground outfield and 6 operatives working on the building at any one time.
30. The development would result in the loss of some 28,000m² of amenity grassland¹⁵; about 1,800m² of ruderal¹⁶ vegetation¹⁷; and 2 trees outside of any ancient woodland one of which is dead and the other in poor condition¹⁸. Conversely, the development would provide for 21,000m² of species-rich semi improved acid grassland; 3,975m² of wildflower/rough grassland; 2,697m² of woodland planting; some 3,000m² of additional open standing water¹⁹; 63m² of wetland habitat²⁰; and 163m² of pond planting.
31. No artificial lighting or additional car parking facilities for the golf club are proposed as part of the development.
32. The applicant anticipates that the development would result in the golf club employing two new full-time professional teaching staff. It is also projected that the development would result in a 9.35% and 11.42% increase in the use of the practice ground outfield during the summer and winter months respectively²¹. This equates to about 4 - 12 additional users per day and about 28 - 84 additional users per month.

Practice Ground Outfield Remodelling

¹² See Drawing Ref. 551.09 Rev B – Contractors Work Plan dated 6 June 2016

¹³ [Ancient woodland and veteran trees: protecting them from development, Natural England and Forestry Commission, October 2015](#)

¹⁴ [Trees in relation to design, demolition and construction - Recommendations](#)

¹⁵ Where ground remodelling is to take place and where the water storage lake is to be constructed

¹⁶ A plant species that is first to colonise disturbed lands

¹⁷ Where the passing bays are to be created along The Drift, where ground remodelling is to take place, and where the water storage lake is to be constructed

¹⁸ Tree No.40, dead Common Oak; and tree No. 72 Common Oak with buttress wound, black staining on trunk and significant deadwood within crown – See applicant's Tree Survey dated June 2016, Appendix 2 and 3

¹⁹ Including a new pond to the north of the proposed storage water lake

²⁰ To the north of the proposed water storage lake

²¹ Figure 22a, Section 6.1.1 of Environmental Statement dated 6 June 2016

33. The applicant explains²² that remodelling of the practice ground outfield, described as a vital component of the golf club, is one of three proposals to raise the quality of the club's existing teaching and practice facilities and to create a centre of teaching excellence²³.
34. It is further explained that the current condition and appearance of the outfield is not considered commensurate with the overall quality of the golf club due to its ground characteristics and lack of any visual and strategic excitement. The outfield is flat, of low permeability and devoid of topsoil. The result is poor quality turf and conditions prone to waterlogging in the wetter months and setting hard in dry weather. Such conditions results in an outfield that looks poor and which cannot be maintained properly with practice balls lost in mud and ball collecting machines unable to operate. The applicant submits that wetter months result in long periods of closure which not only affects members of the club but also limits the income of teaching staff.
35. In order to address the problems associated with the ground characteristics of the outfield the applicant proposes raising and re-shaping the surface of the outfield so that it sheds surface water towards a water harvesting network²⁴ using ground contours and an extensive network of new sub-surface drainage pipework. Surface water would be piped under gravity through the drainage network towards to the proposed new water storage lake at the northern end of the outfield.
36. In respect of the visual appeal of the outfield the applicant intends remodelling the outfield so as to create realistic green complexes designed to mimic features found on golf courses. These complexes will be set at key distances from the covered bays in order to help develop golfers' skills for a variety of clubs. Gentle undulations around the green targets will serve as important drainage channels and frame the proposed complexes. The outfield would also feature a large grassed teeing area in front of the covered bays proposed which is to be used in the summer months and for professional events.
37. The proposed remodelling work is aimed at addressing a need to significantly improve the drainage characteristics of the outfield; a need to improve the outfield's ease of maintenance and therefore aesthetic appearance; and a desire by the golf club to create an exceptional target outfield.

Proposed New Short Game Academy

38. To complement the new practice ground outfield the applicant is proposing to create a new Short Game Academy to the west of the first tee and behind the proposed covered bays²⁵. This would feature a large practice putting green together with a chipping green, multiple grass and artificial²⁶ teeing areas and a practice bunker. This new facility would provide teaching staff with further structure to their teaching programmes.

Proposed Water Storage Lake

39. In identifying a need to significantly improve its practice and teaching facilities the applicant has recognised that by employing an appropriate design strategy the golf club can become self-sufficient in terms of water supply for irrigation purposes. The applicant considers this vital to the sustainability of the golf club in the context of increasing environmental and regulatory pressures on golf courses to be less reliant on mains and groundwater.
40. The process of recycling or 'harvesting' rainwater and storing it for later use is considered by the applicant to be the most effective approach to achieving self-sufficiency in terms of

²² See paragraph 3.2.1 to 3.2.11 of Environmental Statement dated 6 June 2016

²³ See Drawing Ref. 551.02 Rev C – Grading Plan dated 6 May 2016

²⁴ See Drawing Ref. 551.08 Rev C – Drainage and Water Harvesting Plan dated 6 June 2016

²⁵ See Drawing Ref. 551.06 Rev C – Range Building dated 6 June 2016

²⁶ To facilitate all-weather practice

water supply for irrigation. Rainwater harvesting would allow the club to maintain the golf course and practice facilities to a consistently high standard throughout the year whilst at the same time reducing the pressure on water companies during peak demand and generating cost savings for the golf club.

41. Accordingly, the applicant intends to engineer a practice ground outfield which would serve as an exciting practice area and a surface water run-off 'harvesting zone'. Surface water collected from field drains within the outfield will be fed back to the new irrigation lake for storage and later use. When needed water from the new lake would be pumped back to the existing irrigation pond²⁷ before being distributed by an irrigation system.
42. The new irrigation lake has been designed by the applicant to accommodate the potential yield of the 'harvesting zone' and a total of 11,000m³ of water. This figure together with the 8,000m³ of water that is permitted to be drawn from existing water bodies would make the golf club self-sufficient in irrigation water supply.
43. The 5m deep lake would be created by cutting into the existing ground and by bunding around the void created to allow for a proportion of water storage above existing ground level. The material to be used for the proposed earth bunding would be derived from a combination of on-site excavated material and imported inert waste soil. The surface of the lake void would be lined with butyl liner and the lake itself would be secured behind a 2m high chain-link mesh fence coloured green with wildlife access points at its base. Warning signs and life buoys will be deployed around the perimeter of the lake.
44. It should be noted that the applicant obtained planning permission²⁸ from Guildford Borough Council for the creation of an irrigation lake in the same location and of a similar dimension.

Proposed Covered Practice Bays and Associated Rooms

45. As part of the applicant's intention to provide a centre of practice and teaching excellence, the proposed development also includes the construction of a building containing 30 covered practice bays (inclusive of 2 teaching bays and 1 club fitting bay) and associated rooms for storage, administration, teaching and toilets. This part of the proposal is illustrated on Drawings Ref. 551.06 Rev C – Range Building dated 6 June 2016 and 551.07 Rev C – Range Building Elevations dated 6 June 2016.
46. The applicant asserts that this facility would complement the proposals for the practice ground outfield and Short Game Academy in that it would provide a first rate environment in which to conduct individual tuition, group clinics, society lessons, school and holiday tuition etc.
47. The building is to be equipped with the latest teaching aids including computer and video analysis and club fitting technology. Other rooms within the building will include a reception area, swing analysis room, club fitting bay, classroom, administration office, 2 toilets including disabled access, ball storage and dispensing room, cleaning equipment storage, practice ball wash/storage area and ball collecting equipment.
48. The building will be a steel framed structure clad with shiplap timber stained dark brown. The roof will be Plastisol coated steel coloured grey. The proposed building includes solar panels. The roof-space available would allow 200 1m x 1.7m panels to be installed giving potentially 50kW of power. This power will in turn be used for the electrical requirements of the new proposed building, the existing maintenance building and for the operation of the irrigation system. Key dimensions of the building are: length 94.8m; width 9m; 769 m²

²⁷ To the east of the first tee

²⁸ Ref. 09/P/01922

internal floor space; slab height at 51.00m AOD; maximum height of building at would be 3.9m.

CONSULTATIONS AND PUBLICITY

Consultees (Statutory and Non-Statutory)

- | | | |
|-------------------------------|---|--|
| 49. Guildford Borough Council | - | Object to the need for the development under the 'very special circumstances' advanced for the proposal and the appropriateness of the building, impact of the construction traffic on the amenity of properties on the affected roads and the safety of non-vehicle road users along The Drift. |
| 50. Elmbridge Borough Council | - | Object to the proposed route of construction traffic via Cobham and Downside and through three Conservation Areas, past two schools and involving a number of pinch points, most notably between St Andrew's Church (Grade I Listed) on the east side of Downside Bridge Road and Pyrports (Grade II Listed) to the west. |
| 51. The Environment Agency | - | No objection subject to a condition requiring the submission of a scheme to dispose of foul drainage to the CPA for approval in writing. |
| 52. Natural England | - | Advises that the proposal is unlikely to affect any nature conservation sites or landscapes and has therefore not raised objection to the development. Natural England has not assessed the application for impacts on protected species but has referred to their standing advice. In respect of local nature reserves Natural England advise that the CPA should ensure it has sufficient information to fully understand the impact of the proposal on the same before it determines the application. |
| 53. Surrey Wildlife Trust | - | In October 2015 the Trust advised that should SCC be minded to grant permission the applicant should be required to undertake all the recommended actions in the application to help prevent adverse effect to badgers, bats and wild birds resulting from development works including the biodiversity enhancements proposed. SWT advised that the development would considerably increase the risk of Great Crested Newts being adversely affected by works associated with the development without a considerable amount of mitigation which is likely to require a licence from Natural England. Concerned that the proposed passing places could impact ancient woodland habitat. Considerable additional amounts of traffic disturbance, including noise, fumes and accidental chemical deposition can have adverse effects on sensitive habitats such as ancient woodland and the species they support. Generally satisfied that the landscaping and planting proposed will help deliver biodiversity value to the site post development. |

- In October 2014 the Trust advised that although additional planting is to be provided it is concerned that, with the stripping of the topsoil and other proposed works on site such as the creation of the new lake, the areas of buffering are not sufficient to be able to protect the adjacent ancient woodland during the construction period, therefore we would recommend that they are increased to the minimum proposed by Natural England as set out in their Standing Advice.
54. The Woodland Trust - areas of buffering are not sufficient to be able to protect the adjacent ancient woodland during the construction period, therefore we would recommend that they are increased to the minimum proposed by Natural England as set out in their Standing Advice.
55. County Highway Authority - No objection subject to a s278 agreement and a range of conditions.
56. Highways England - No objection. Concluded that the proposal is unlikely to have an unacceptable impact on the safety and/or efficient operation of the strategic road network i.e. M25 and A3.
57. English Heritage - The application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.
58. Lead Flood Authority - No objection subject to conditions. The proposed drainage scheme meets the requirements set out in the National Planning Policy Framework and its accompanying technical guidance.
59. SCC Archaeologist - No objection subject to condition securing the implementation of a programme of archaeological work in accordance with a written scheme of investigation.
60. SCC Historic Buildings Officer - No objection subject to conditions. There is not anticipated to be any lasting change to the setting of the two Listed Buildings on The Drift. At this pinch point HGVs will be moving slowly which will help reduce ground vibration. A rubberised mat finish on the road would also help. Any passing bays and other highway mitigation measures should be removed within 12 months of the commencement of the development to negate urbanisation. The area of ground raising and development is at sufficient distance from Listed Buildings such that their setting will not be affected by the proposal. In respect of Listed Buildings on Downside Bridge Road and Downside Road if HGVs are on the tarmac road surface they should not collide with any heritage structures. I am of the view that the built environment conservation policies of the NPPF are met by the application.
61. SCC Arboriculturalist - No views received.
62. SCC Environmental Noise Consultant - No objection subject to a condition limiting daily HGV movements.
63. SCC Air Quality Consultant - No objection subject to a condition securing a Dust Management Plan. Air quality impacts associated with

- emissions from vehicle movements are not likely to be significant.
64. SCC Landscape Architect - No objection subject to a 10-year Landscape and Ecology Management Plan.
65. SCC Ecologist - No objection subject to a s278 agreement and conditions relating to great crested newts, badgers, protection of road verges, and a woodland management plan.
66. SCC Rights of Way - No objections subject to conditions.
67. Thames Water - No objection with regard to sewerage infrastructure capacity. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, water course or suitable sewer.
68. Affinity Water - No views received.

Parish/Town Council and Amenity Groups

69. West Clandon Parish Council - Strong objection. The proposal will be harmful to the Green Belt by introducing a man-made and developed form, introducing new buildings and the likelihood it will harm biodiversity. The proposed building is of significant size – as big a floor area as eight average size family homes (96.8m²). It constitutes inappropriate development which should only be allowed in very special circumstances. No very special circumstances have been shown. Whilst it is true the applicant wishes to develop the land for commercial reasons this is not a special reason. There is no shortage of golfing facilities in the area. The applicant does not show why it is necessary to import the proposed quantities of waste onto the site. The proposal fails to show how it can be considered sustainable development to import unnecessarily such a large quantity of waste onto the site much of which will have to be brought considerable distances. Additional HGV traffic will be harmful to the amenity of residents in West Clandon as well as to residents on other parts of the proposed traffic routes. Residents will have to suffer noise, vibration and air pollution.
70. Effingham Parish Council - Strong objection. The applicant has failed to demonstrate any 'special circumstances' and that the benefits of the proposal outweigh the nuisance, environmental damage, road safety dangers, and inconvenience for local people.
71. Ripley Parish Council - Object to the unacceptable increase in HGV traffic on unsuitable local roads, the scale of the traffic movements associated with the proposal, and the potential run-off of water from the proposed lake into local watercourses in the event of adverse weather conditions. The Parish Council also considers The Drift unsuitable for the development and that the proposal would adversely

affect wider traffic movements around Effingham and East Horsley train stations particularly at busy morning and evening times.

72. Ockham Parish Council - Object. The proposed route Cobham, the A245 Downside Bridge Road, Downside Road, Horsley Road, Forest Road and The Drift merely shifts the proposed HGV movements from one route along narrow, unlit rural lanes without pavements and through residential areas to another with similar characteristics which also apply to the proposed return route via Ockham Road North to the A3. The fundamental issue is the massive importation of material to a site of difficult and restricted access, and for a purpose the need for which has not been convincingly made. We also have major concerns regarding the proposed new building, practice ground and water storage lake in the Green Belt as well as the potential additional and on-going traffic movements along The Drift and surrounding roads should use of the Golf Club be significantly increased as a result of the establishment of a golf academy.
73. East Horsley Parish Council - Object. The highway, traffic and access implications would be severe. There are no 'very special circumstances' to justify harm caused to the Green Belt. There are significant environmental concerns. There are concerns about monitoring developer obligations. If SCC is minded to grant permission please restrict HGV movements to between 0900 hours and 1430 hours to avoid road safety issues during the school commute and morning rush.
74. West Horsley Parish Council - Object. The proposed development will have a major adverse impact on roads, residents and environment in East Horsley, Cobham, Ockham and West Horsley. The traffic impact will be severe and no 'very special circumstance' has been logically demonstrated to justify ferrying by large numbers of HGVs the thousands of tonnes of inert waste material for dumping on the Green Belt. If SCC is minded to grant permission then conditions must be imposed to enable effective control and supervision of the entire operations whether on public roads or the site. Such conditions should require the applicant to provide an insurance bond of one million pounds as surety for the cost of repairs to damaged roads, culverts, drainage ditches, pavements, traffic signs and road-markings. A detailed jointly agreed photographic survey of the approved routes to and from the site must be agreed in advance of waste movements to site commencing.
75. Cobham and Downside Residents Association - Object. The route for HGVs is totally unacceptable. The hold-ups around this part of Cobham is enormous and the junction where one turn off from Between Streets into Downside Bridge Road is often gridlocked. The local roads are in a poor state of repair and the development would make a bad situation worse. The traffic flow

problems would be disastrous and would literally bring traffic to a standstill. Any travel plan, for any proposal, which involves huge numbers of HGVs using Cobham's poorly maintained narrow roads must be avoided. Cobham is simply unable to absorb any more heavy traffic. Would it not be preferable for HGVs to turn off at Junction 9 of the M25 and travel along the A246 to reach the site?

76. Cobham Conservation and Heritage Trust

Object. No explanation from the applicant for the source of the imported waste and the economics of the project which should feature in any objective assessment of the justification of movement of the waste concerned. This in addition to the need for the applicant to actually establish the need for the proposed development. The applicant's HGV route survey only takes account of southbound movement. In doing this the applicant is not surveying which is the most significant pinch point on the route which is between St Andrew's Church (Grade I Listed) and Pyrports (Grade II Listed). Why has the applicant not chosen to survey this particular point in some detail? It would then have been able to assess the higher level of traffic there which takes traffic coming towards Cobham from Cobham Park Road and Plough Lane junctions into account and assesses the effect on traffic turning into Church Street. No examination is made of the significant pinch point at the roundabout in front of the White Lion Building (Grade II Listed) on Portsmouth Road as HGVs would turn right on the A245 onto the narrow Between Streets. No effort has been made to analyse use of the roads south of Cobham by cyclists. Despite the time restrictions relating to HGV deliveries the difficulties created at the pinch points, the added dangers and the way pollution would be caused are not something to which the communities concerned should be exposed to. Cobham is increasingly coming under the spotlight regarding air pollution that should not be lightly added to. An already high atmospheric pollution caused local health problems. The development should be rejected on this criterion alone. Highway safety would be prejudiced and /or immense inconvenience would be caused to other road users quite apart from the general disruption to and the effect on health to the local community.

77. Ockham and Hatchford Residents Association

Object. The additional heavy traffic along The Drift, Forest Road and Ockham Road North are totally unacceptable on these narrow country lanes.

78. The Highlands Association

Object. At its closest point the Golf Club is less than 300m away from the Highlands. Given this proximity, we believe that many residents will be significantly affected by the high level of noise (construction and striking of golf balls), dust, and airborne spores (e.g. Japanese knotweed) and environmental pollution throughout the construction, whilst the impact on the surrounding rural road network will be disastrous. Substantial damage will

be inflicted on the fragile rural roads in the area. There are 10,000 people living in and around the villages surrounding the Golf Club. For a year their lives will be lighted by the noise, pollution, road damage and physical harm caused by a procession of massive earth-moving vehicles racing through their villages. And the benefits to be gained? That a handful of winter golfers may keep their feet dry on the practice range.

- Object. The volume of traffic to be generated is unacceptable for the existing road network which is principally minor and unsuitable. There will be considerable disturbance to residents along the route and congestion at certain times of the day. The system is already overloaded at peak hours. The current make-up of The Drift is hardly current MOT standard for 32 tonne HGVs. In addition to the two dwellings on The Drift, noted to be a pinch-point, there is the question of the stability of the old brick-built bridge over the stream at the Ockham Road end of The Drift. Closure of The Drift due to bridge damage would have a large disruptive local impact. There are concerns that there would be unacceptable disturbance to wildlife and long-term detrimental impact on existing fauna and flora including Great Crested Newts. The development would cause serious disturbance to bats and nesting birds including barn owls in the Forest SNCI and around the Golf Course. The change to the geological element could have an effect on both the drainage and water table to the area. The applicants should be required to demonstrate that there will be no or little detrimental impact in this sphere. The waste to be used cannot be guaranteed to be free from contaminants. A development of this scale effecting local water courses and on Green Belt land could only be justified for some extraordinary reasons i.e. National Interests. Increasing the number of golf practice facilities in Surrey, a part of the country already well-served for golf facilities is not sufficient justification.
79. Horsley Countryside Preservation Society -
- Object. The proposed building is enormous and is totally inappropriate development out of keeping with its environment and the Green Belt. No 'very special circumstances' exist for the proposed development. Given that the waste will be inert it is not appropriate to dump this on Green Belt land.
80. Effingham Residents and Ratepayers Association -
- Objected to the development as proposed in 2014. The development, especially creation of passing-bays, could impact Great Crested Newts, toads and their habitat as well as the Forest SNCI. An ecological impact assessment with mitigation and health and safety considerations in relation to the toad crossing, as well as the Forest SNCI and the Great Created Newts/toad populations on the Golf Course does not appear to have been conducted. We have not had the opportunity to views the proposals for creating the reservoir on the Golf
81. Surrey Amphibian and Reptile Group -

- Course which could also impact the local amphibian populations.
82. British Horse Society - No views received.
83. CPRE Surrey - Object. The Government attaches great importance to the Green Belt and in 2014 SCC unanimously passed a motion expressing their support for the Metropolitan Green Belt throughout the County. The proposal would involve the delivery of many lorry loads of soil being brought in by HGVs using access along narrow lanes. The heavy additional traffic would be harmful to the amenity of residents living in the proximity of these roads and to the countryside due to noise disturbance and air pollution. The safety of other road users such as cyclists, walkers and horse riders would be put at risk. The development is inappropriate in the Green Belt and will be harmful to its openness. The applicant has not demonstrated 'very special circumstances' which clearly outweighs the harm to the Green Belt by reason of inappropriateness and any other harm. Surrey is already supplied with a large number of golf courses so one has to question whether there is need for additional associated facilities.

Summary of publicity undertaken and key issues raised by public

84. The application was publicised by the posting of several site notices along The Drift and at the entrance to the golf club in October 2014 and August 2015 and 2016. Adverts were placed in the Surrey Advertiser on 3 October 2014, 18 August 2015, and 10 August 2016. Additionally, a total of 266 owner/occupiers of neighbouring properties and other interested parties were directly notified by letter and/or email. This publicity has resulted in a total of 277 representations which are summarised below:

Highways, Traffic, Access and Routing

- The Drift is an important link between the communities at Effingham Junction and East Horsley with its shops, two schools and medical clinic. It is also a link to West Horsley and is also used by traffic coming from Effingham and Cobham
- Whether HGVs are loaded or not, they should not use The Drift irrespective of any departure from the 7.5 tonne limit
- The Drift carries a weight restriction "except for access". I would suggest that the traffic movements proposed do not fall within the exemption criteria. They were intended for normal delivery and refuse collection vehicles- not for over 6,000 HGVs over a course of 9 months
- The Drift is a BOAT (byway open to all traffic) and this road was not meant to handle heavy vehicles neither does there seem to be provision for reinforcement of the culvert
- Other than obvious potholes that are all over the Drift road, there are sunken sections as well that have been reported to the authorities (yet to be acted upon) that have been caused by heavy duty vehicles
- The Drift breaks up every year. It is a tarmac former country track would be most likely to stand up to more than a week or two of the heavy lorry traffic
- The various pinch points along The Drift, poor surfacing and obscured visibility along the length of the highway are problematic enough for private cars let alone the detrimental effect of 33 HGVs each day

- The development at the Drift Golf Club seems to ignore the impact that it will have on traffic congestion in and around the neighbourhood and, in particular, Ockham Road South
- As the development of the teaching facility will also mean ongoing increased traffic along the Drift (and other roads) the Golf Club should be expected to make an ongoing extra contribution to road repairs
- The Drift will subject the small culvert at the bottom (at an important junction with the B2306) to constant wear and vibration
- The bridge at the junction of The Drift and Ockham Road North is too narrow for these lorries, it allows only one car at a time. The bridge could not support this number of lorries, potentially destroyed making the drift completely impassable, cutting off West from East Horsley
- HGVs carrying about tonnes of earth would have to traverse The Drift every 10 to 15 minutes during the working day for a period of nine months
- At great expense I have had to renovate my fence several times per year for the last 13 years mostly caused by lorries, 4x4's or just dim witted people. The cause of such damage will only get worse – *owner/occupier of dwelling on The Drift*
- There is no way in which 'traffic control measures and passing places' will obviate the need for other motorists (including cars, vans and other HGVs) to back up- this is well-nigh impossible over much of the west end of The Drift. The Drift is used very heavily for the transporting of children to the schools on Ockham Road and East Lane. It is 100% certain that vehicles will form a solid jam, requiring the police to intervene (and political consequences)
- Traffic lights on The Drift would be a serious inconvenience for local traffic, which uses the road as a connection from West Horsley and parts of East Horsley, to get to Effingham and Cobham
- The introduction of traffic lights on the drift as a solution appears to have overlooked one key issue. Traffic when queuing at red traffic lights will take up part of the road. How therefore will traffic on a green light be able to pass those vehicles queuing when the road in many parts is not wide enough for a HGV and a car let alone a HGV and another commercial vehicle?
- Even with a traffic light system at the pinch point between North Forest Lodge and Blue Ride Lodge (both of historical importance to the village) the distance down to virtually the bridge would need to be clear for one way only at any given time. Similarly, the road in the other direction towards the Club would need to be within the traffic light system for at least 100 metres
- The proposal involves large numbers of heavy earth-carrying vehicles travelling through a series of residential communities, passing through areas already subject to regular traffic congestion and along a number of narrow rural roads before reaching The Drift
- The emergency services vehicles would not be able to use The Drift from Ockham Road North into the Drift to service any houses or residents; neither would they be able to access Forest Road from that direction
- To resolve the problem of access for the HGV vehicles would be to widen The Drift (especially the western end) by at least 5 metres or to create a temporary road across farmland, in order to create a direct link between Ockham Road and the golf club. Exiting from the golf club onto the Drift in an easterly direction presents less of a problem, but still one that cannot be ignored
- Ockham Road North/South is a very busy road and one frequently has to squeeze over to allow lorries and buses to pass, not to mention the refuse collections. There are school buses twice a day, apart from the regular service. In places the footpath is very narrow. A right turn into Forest Road is against oncoming traffic, on a bend. The narrowness of Ockham Road South and Forest Road means that there are significant safety issues, congestion and delays
- There are three very busy schools in The Horsleys and the roads in the mornings and afternoons become very congested. Lorries will have great difficulty in getting passed

- the waiting cars at both drop off and collection times on Ockham Road North as lorry drivers never take prescribed routes. Accidents will occur, in particular when young children are being collected from school
- Ockham Road North/South and Forest Road would be severely damaged by the number and weight of vehicles proposed
 - Complaints have for many years been lodged when excessively large or heavy goods vehicles have been observed using Ockham Road South due to its limitations: these proposals would seem to ignore the need to preserve the infrastructure for normal village life
 - Ockham Road will also be expected to take 50 or 90 lorries compared to 11 normally
 - There is an existing problem with volume and speed of traffic on Ockham Road North, this is well known to Surrey highways
 - Surrey CC Highways undertook a traffic monitoring exercise on Ockham Road North between the 7th and 13th of September 2015, the results indicate an increase of 22% in traffic volumes using Ockham Road North between Jan 2015- Sep 2015, this includes an increase of HGV/ LGV movements from 516 to 5,267- an 1000% increase. Average speeds 47 mph through the residential area. The road noise is already twice what Surrey CC considers acceptable
 - The route these HGVs are supposed makes no mention of one of the most dangerous parts of the journey i.e. from the A246 along Ockham Road South to get to Forest Road. Along this stretch are numerous places where even two cars struggle to pass each other and when a bus comes along people have to drive on the pavement. What will happen when a bus meets several HGVs along its route?
 - Forest Road has narrow stretches, plus an awkward turn into The Drift
 - There is no pavement at all along part of Forest Road, yet another danger for the poor local pedestrian population
 - Forest Road will be expected to take 33 lorries per day compared to 2 normally
 - Traffic regularly speeds down Forest road- the thought of over 6,000 HGV movements is an accident waiting to happen
 - The run off area to assist lorries turning into The Drift from Forest Road looks very dangerous with heavy lorries having to negotiate a very tight left turn on an adverse camber, the runoff making it even worse
 - If lorries were to enter from Forest Road, they can surely exit the same way. The road is in fact wider there, unlike the space between the two lodges
 - The junction by Effingham Station is often very busy and carries a lot of traffic for the Howard of Effingham School, entering the built-up area there are often cars parked by the roadside causing delays
 - There is already serious and severe congestion in and around the Cobham area which exists throughout the day but is particularly bad in rush hour. This is further exacerbated when the M25 has a problem as traffic diverts onto the A245 to skip between junctions 9 and 11
 - The A245 from Painshill to Downside Bridge Road has been resurfaced in the last 12 months. To add 6,000 additional HGV trips to this road at this time would contribute to a reduced benefit to Surrey residents from the expensive resurfacing that has just been done
 - Deliveries of spoil will be suspended during morning and pick up times in afternoon, however does not consider twice the volume of traffic at lunchtime due to combination of am and pm collecting children at Downside Nursery School/ St Matthews School
 - Coming from Pains Hill: you have a busy roundabout at the Sainsbury junction, the beginning of Between Streets is on a bend and narrow, the middle of the road refuge for the right turn by Waitrose is barely wide enough for a car, the road is very narrow after the Church Street turning, it is very winding leading up to Downside where there are two schools close by
 - Downside Road passes right outside St Matthew's primary school and Downside Nursery. The pedestrian entrance for the latter is on Downside Road. Parents dropping off or collecting children for both school and nursery park opposite in

- Chilbrook Road and walk across Downside Road. Frequent HGV movements during the afternoon collection period would represent a considerable potential hazard
- Between Streets (A245) is the crossing route for children from Cobham Free School (aged 5-11 years) accessing their sports facilities adjacent to Painshill Garden. This crossing is marked by a 'school' road sign. To have 6,000 additional HGVs traversing this section of the road would be a hazard for the school children
 - The route from Cobham along Downside Road is far from ideal as there is a significant pinch point by Pyport's/ Church Road junction/ St Andrew's church. The road is so narrow at this point that meeting a larger passenger car, let alone a large HGV, can involve the need to give way. The passage of HGV's would effectively make this length of Downside Road a single lane
 - As has been demonstrated in other instances nearby, e.g. at Jury Farm, the lorry drivers use the routes they find best and not necessarily the ones that have been agreed
 - The financial responsibility to restore the tour to a proper standard should be strictly enforced
 - The roads in this area are too small to sustain the amount of proposed traffic. It is widely acknowledged that the damage factor on roads from vehicle axles increases by approximately the power 4 i.e. a tonne axle will cause 10,000 times the damage of a one tonne axle
 - The damage these trucks will do to the already poorly maintained roads is not acceptable
 - How can you ensure that the vehicles do not exceed the number set out and that they do not travel through the villages outside the times stated in the planning application
 - Who will pay for the works required to enable passage of such large lorries, such as cutting back of trees and bushes? Who will pay for the damage caused to the local infrastructure? Will there be an independent assessment of the state roads to be used both immediately prior to transportation beginning and immediately afterwards? Will the contractors agree to pay for any work required to put things right?
 - The highways, traffic and access implications of the scheme are severe and unreasonably onerous for the narrow semi-rural roads in the vicinity
 - The country roads are prone to numerous water leaks and full of pot holes. The repairing of such holes has been insufficient over the years, and every winter they weaken and break up
 - The sheer size of the lorries mean that accidents are pretty much inevitable, some of these quite probably leading to serious injury or loss of life given the number of cyclists, pedestrians and horse riders whom routinely use the relatively narrow routes proposed
 - The development will result in traffic jams in traffic jams on an intolerable scale
 - Past experience of such schemes shows that monitoring of the movements of lorries is very lax, and no attempt is made by the County Council or other authorities to ensure compliance with the conditions, such as the routes taken by the vehicles or their contents, even when breaches are pointed out to them
 - The proposal states that any found to be in breach of the conditions would be banned from the site. The Council needs to go further- the operator should be banned from the rest of the project and the operation fined an exemplary amount for each and every breach of condition
 - Local traffic is set to grow even more dramatically under Guildford Borough Council's draft Local Plan, which envisages a new town of 2,100 houses adding 10,000 vehicles to local roads
 - There will be conflict between HGVs and traffic emerging from adjacent properties
 - The proposed lorry ban between 8 and 9am and after 2:30pm is meant to persuade us that schoolchildren would not be in danger. But it is totally unenforceable and takes no account of the flexibility of modern school hours. Such a ban would increase the danger by squashing the same number of HGV movements into a five-and-a-half hour window (9am to 2:30pm)

- The proposed routes cannot be justified – an alternative solution must be sought
- Suggest that consideration is given instead for vehicles leaving the A3 to use Old Lane (just south of the filter from Junction 10 of the M25 on the A3 south/west bound) as far as Effingham Junction before turning right into Forest Road and hence right again into The Drift
- By the lifting of the 7.5 tonne weight limit on Old Lane, the waste could be transported. Old Lane was significantly improved and upgraded to a high standard within the last 15 years. It is a wide road and does not have an excessive daily volume of traffic nor are there many properties along the route
- Considerations to consider: a penalty tariff for failure to comply with routes/timings, a pre-assessment survey is done on the roads, hours of operation are reduced, and the Drift Golf Club funds a full time SCC employee for duration of project
- Development will happen with local businesses to grow but the Drift Golf Club has not thought about local residents or seems to care how all of this HGV traffic will impact and possibly endanger local families
- The road mileage proposed in delivering the waste from the A3 to The Drift in such a long roundabout way suggests that the Applicant had no interest in saving fuel, pollution and money
- Although the preferred route is being promoted on its environmental credentials, it is essentially a way of cutting journey times and distances and therefore for reducing costs
- Local residents are campaigning for a reduction in the speed limit to 30mph along Ockham Road. If the proposal included this as part of the application, as well as a change of road surface which should have been specified in the first place, it would go some way to mitigate any adverse affects as a result of the proposed development
- A further condition should be that all vehicles involved be fitted with GPS devices so that their routes can be plotted- even in retrospect. If more than one vehicle has been found to be diverged from the required route then the project must be abandoned. Vehicles should also carry a prominent identification marker for the information of local residents
- The Parish Council have failed to highlight the fact it is not just inconvenient for those walking to and from the Railway Station, when it rains and these large vehicles come through we are drenched in dirty drain water because of the drainage on the street
- A major development has recently been agreed by Elmbridge Borough Council at the White Lion Inn site on the A245. To add further heavy goods vehicles to those entering and exiting the site being redeveloped would constitute a safety hazard on the highway
- Councils should be consciously striving to preserve a local environment that is friendly to walking and cycling at a time when the rural nature of villages like West Horsley is under significant threat from urbanisation and traffic congestion
- The applicant states that Downside Nursery School does not access directly onto the proposed route. This is incorrect. The vibrant, Ofsted rated outstanding Nursery facility opens directly onto the proposed route. Additional HGV traffic would be a significant hazard for nursery age children and the noise would affect the nursery school throughout the day. The proposed exclusion period 8-9am takes no account of collection times
- No issues with planned alterations merely to the impact of lorries in the area
- An additional hazard is the persistent spring just below the crest at Blue Ryde Lodge, which frequently breaks through the surface and deposits water and ice in winter on the road
- The Drift floods regularly at both ends, where there are dangerous and sharp turns difficult for HGVs to negotiate
- The Horsley's Community Bus, a 12 seat fully accessible bus for the less able passengers in the locality, and which is in use virtually all and every weekday around the local villages. We have to use the Drift to collect and deliver passengers who live close by, as well as all the other local roads to be used by the proposed HGVs

- No notice appears to have been taken of loads being sent over the culvert at the Ockham Road North end of The Drift. The culvert will not suppose the weight of a fully laden lorry
- The enormous amount of domestic building and renovation that now is a feature of the Horsley's is also causing an increase in traffic, with building materials and skips regularly being delivered and workmen needing to park their vehicles on the roadside during the day
- The Cobham/Horsley route is very popular with cyclists and cycling clubs. Cycling has been formerly a little used weekend recreation popular with relatively few, but, over the past few years has seen a rapid growth in the numbers of participants. Cyclists are to be seen almost any day of the week and their presence requires increased vigilance from drivers. The groupings of participants vary from lone cyclists to large groups in excess of 12 (all of whom seem to behave as if they are part of the peloton in the Tour de France). The poor road alignment provides few opportunities for overtaking and the additional HGV traffic will provide an increased risk to those road users
- Surrey County Council Road Safety Outside Schools Policy, July 2014 covers West Clandon and any other area that has a school on the proposed route. The proposed policy to reduce the risk of collisions and to make the road feel safer in order to improve the activeness of walking and cycling to and from schools- there is no mention in the Driftwood Application. Furthermore the priorities to reduce the traffic speed to 20 mph yet to happen in West Clandon
- The Driftwood Golf Club has failed to do a risk assessment to the surrounding villages that will be at risk from the proposed routes. All the documents I have looked at from them make no mention of the impact it would have on any of the villages, their only concern seems to be that their HGV's might have to try to pass each other and that would be inconvenient for them
- The now preferred route includes a section of Forest Road in Effingham Junction where most houses are situated very close to the roadsides and where on-street parking effectively limits the passing width to a single vehicle. The impact of 45 large heavily-laden vehicles passing by very day for a year will be particularly severe

Waste Management

- This is a landfill waste site on our doorsteps. A significant surplus would be generated and the new facility paid for and money in the bank. That's at no expense to the Golf Club but significant cost to the neighbourhood
- The project will generate significant income for the golf club the purpose of the golf club is golf not generation of income from providing a landfill opportunity in the countryside
- How confident can we be that the waste that is finally tipped is appropriate
- Impossible to guarantee that the material will be inert, may well contain pollutants, given its source. Not possible to analyse every lorry to guarantee that the material is inert
- What is the waste? Where is it coming from and what, if any, are the problems that might arise in the future from its use?
- Any contaminant run off from the site will reach the River Mole only a mile away, polluting Cobham and points downstream to Hampton Court
- Suggestions that the transported material will be less than pure soil and will include materials otherwise sent to landfill. If this is the case, application should be rejected on the basis alone as only approved soil should be used
- The fact that construction/demolition/excavation spoil will be used is worrying, especially from the point of view of its possible toxicity and harmful effects over many years
- What safeguards are in place that this area does not become contaminated with substances and chemicals within the waste?

- It is not necessary to import waste to create 'sustainable rainwater harvesting.' The area floods regularly already, all that is necessary is for minor landscaping if the applicant wants more irrigation lakes
- Is there a need to create a reservoir in this way? Why cannot the area be excavated to accommodate the water storage lake and the resulting spoil used to build the banks? The whole problem would then be minimized. Does the Club gain financially by transporting in tons of spoil from another area?
- The Drift Golf Club could address the drainage problems of this site through a conventional drainage project but choose not to because of the profit to be made by the club's owners
- Although the proposal refers to 'soil' as the material being imported, it is clear from other sections of the proposal that it is, in fact, intended to be inert landfill material. The proposal is essentially a landfill operation
- What would happen to the tip if the Golf Club or the driving range were to close? Will the tip be removed? How would the tip be maintained? So at no expense to the Golf Club but significant cost to the neighbourhood we will have a waste tip on our doorstep
- Will the proposed testing of the inert material be robust enough under day to day operational pressures to ensure that the fill meets the required standard?
- A major concern/ objection is that the application mentions using 'Environment Agency approved soils.' The EA seems incapable of defining what 'approved soils' means, when asked
- To make a short practice area could be simply achieved on existing land. It does not need extensive remodelling in order to create these facilities
- The proposed use of these materials is clearly only for cosmetic addition to the Golf Club and not in the least necessary
- Other ways in which works can be achieved is by introducing irrigation and land drainage. No reason as to why this option has not been chosen, the area of a driving range is only a small fraction of the whole course where drainage and irrigation has been carried, the opportunity is also available to improve water self-sufficiency by undertaking such works
- Such enormous quantities of waste should be transported, as they were in the past, along railways rather than along our leafy lanes
- Why cannot the golf club purchase/ rent land and create a dedicated route for their construction traffic over the period of re-landscaping the course and constructing additional facilities?
- Householders along the proposed route will be unable to enjoy their houses and gardens due to the noise and pollution during the hours the lorries are moving landfill. Many of the inhabitants are retired or do not work the traditional Monday-Friday hours so they will be affected during the week
- The section of Downside Road after the village of Downside has houses either side, including farms with stables. Bringing these 33 HGV vehicles each day into contact with horses from local riding stables such as Highway Farm would be hazardous
- As an ex member of the Drift of some 26 years I had many years of pleasure there and still believe it to be one of the finest and most attractive in the area. The present owners are due great credit for what they have achieved in enhancing the condition of the playing areas largely by the implementation of drainage and irrigation schemes. The latter achieved by excavating existing lakes to provide further capacity in addition to the installation of a storage tank, piping, pumps etc. I note that the proposal includes a new storage lake and the claim made that this would be an environmental advantage. I accept this so but why not just dig a hole and use the resulting spoils as was done previously?
- As a member of the Drift Golf Club, I support the provision of the new building and practice bays and a new storage lake but another solution must be found to remodel the existing practice ground

Pollution/Health Impacts

- For those who reside in West Clandon and East Horsley the increased levels of noise, vibration, toxic fumes over many months will make life absolutely wretched – if not intolerable – for the inhabitants
- The noise from the balls being hit in unison on a driving range is known to be cacophonous and unpleasant
- The Drift Golf Club has parts of West Horsley, East Horsley and Effingham very close by and the works will cause noise disruption to the houses nearest to the Drift, for example those on Surrey Gardens
- If HGV transits take place day and night the noise pollution will be very distressing to local residents
- The noise of traffic on this road (Ockham Road North) is currently twice what SCC considers acceptable
- The wider impact of the increase in noise from the vehicular traffic, both during and after construction, needs to be addressed as part of the process, not just on The Drift itself
- A combination of the speeds and the rough chipped surface on Ockham Road North already provides very significant and intolerable road noise. I have measured this at between 70 and 80 db for car traffic and more than 80 db for HGVs
- One of my neighbours houses shake when a HGV goes by at speed. The noise is often accentuated by the relatively narrow width of the road, as vehicles (particularly HGVs) straddle the central line and run over the ‘cats’ eyes’
- I note that no measurement of vehicular noise on Ockham Road North has either been requested and/or provided as part of the proposal and this is a serious omission
- Cossins Nursing Home lies along the suggested route and would suffer noise pollution
- 66 HGV movements a day would generate additional diesel emissions all along the proposed route. These are harmful to human health, in particular for children
- The centre of Cobham is already a recognized Air Quality Management area. To add a further burden of HGV vehicles, particularly ones carrying waste products, would add to the air pollution. There have already been respiratory problems recorded from the pollution in Cobham. These movements of inert waste are an undesirable added health issue for residents
- On the balance of public fairness, one resident contends that it would surely be impossible to approve a commercial development that would benefit only a few people’s leisure activities at the cost of enormous HGV pollution, misery and danger to the many people who actually live in this area
- There will be no benefit to local people to bring in thousands of tons of waste, construction materials. The pollution that this waste will cause may damage people’s health
- Through experience of the landfill at Jury’s Farm, where originally cited 50 lorries per day would deliver waste between 07:30 to 16:30, but in reality between 80-90 lorries per day delivering waste between 04:30 to 19:00. Waste was not contained safely, resulting in debris, including larger construction waste, being dropped on the road and also into people’s gardens, posing a serious health risk
- HGVs are damaging to public health, both directly and indirectly in discouraging walking and cycling on local lanes
- The impact of further HGV movements on the A245 will bring an unacceptable further load onto the AQMA and for this reason alone the application must be refused

Ecology

- The site lies within 3.3km of the Thames Basin Heath SPA and within 2.5km of the Bookham Common SSSI and there are 4 SNClS within 2km
- The south side of the access road The Drift abuts the Forest Site of Nature Conservation, well documented as habitat of the Great Crested Newt. The species is protected under European and British Law

- There will be a possible breach of conservation laws relating to protected species and disruption, danger and damage which will be caused by the work
- The Drift runs between two widely spaced parallel banks and ditches, one on the North side formed the boundary of the ancient Barnsthorns wood existed since 1242. Trees in the golf course roughs are the surviving remnants of this Ancient Woodland
- The Forest Nature Reserve is part of an SNCI and is classified in the Surrey Inventory of Ancient Woodland as semi-natural ancient woodland
- The Drift is a registered toad crossing, with five species of amphibians recorded; common toad, common frog, common newt, palmate newt and great crested newt
- The proposal to create passing places along The Drift would irreparably damage and destroy this habitat and contravenes both British and European Law
- It is difficult to see how the proposed re-instatement of the passing places would fully restore the status quo
- Rescue and monitoring management of toads is ongoing until the end of the migrating season-end of April. The presence of so many heavy lorries added to the existing traffic would make rescue and monitoring work dangerous
- April is bird nesting season with restriction to woodland and hedgerow work to prevent disturbance of nesting birds
- The red-listed species of song thrush, starling, and marsh tit; and amber-listed bullfinch and firecrest are present within the woodland surrounding the golf course
- Object to any vegetation being removed from the Drift, the eastern end- this area is only just reaching maturity after a prolonged period during the bridge rebuilding project which took place 4-5 years ago, it would be sacrilege for this to be cut down again
- Changing the natural flow of water in an area is very likely to have a detrimental impact on local flora and fauna
- The proposed HGV movements would have an adverse effect upon the wildlife in the forest adjoining The Drift
- Wild creatures of all kinds will be affected by the noise, dust and additional road usage and their numbers will not easily build back up. This is particularly worrying in the case of those creatures whose numbers are already giving cause for concern to those of us who care about such things
- There is the factor of the migration period for amphibians including Great Crested Newts from the beginning of February to the end of April when they move across the Drift from The Forest to the ponds on the Golf Course. Work during this time would have an adverse effect on all the amphibians and this should be taken into account
- The proposal for a second fence on the Golf Course side of the Drift is interesting. I know from helping to install the fence on the Forest side that this involves a considerable amount of local clearance and disturbance. Should it be approved it should be done outside the amphibian migration season and bird nesting time. The second fence should also have a funnel link connecting it to the toad tunnel installed by SCC so that this safe route for amphibians can continue to function
- Surrey Wildlife carry out a lot of work protecting the wildlife in the Forest and I feel that all their efforts will be in vain should this project go ahead as it will, of course, be of a quite lengthy duration
- Light emissions from expanded golf course and driving range, where floodlights are sure to drive out rare local wildlife such as pipistrelle bats
- Like many applications this one uses eco-clichés to justify itself. There are no ecological improvements from this project

Landscape and Visual Impact

- The construction phase will start with the stripping of soil and vegetation from large areas to be followed by the delivery of land fill material. This will all have the appearance of a moonscape, devoid of vegetation, with high unnatural features, detrimental to landscape
- The proposed building would impact negatively on the rural landscape

- The proposed partially elevated reservoir will have a major visual impact due to the considerable increase in ground levels to more than 53 m at the southern bund wall in comparison to the lowest level of this area just above 47m
- Proposed solar panels would be an eyesore

Amenity Impact

- SCC has a duty to protect the High Streets in the Borough. To this end, 5 year parking and cycling strategies have been argued to encourage more people to use the High Street. Furthermore Elmbridge Borough Council has local CIF funding to improve the environment of High Streets and to encourage their use. Bringing an additional 6,097 HGVs through Cobham High Street would make a mockery of these policies
- Heavily used retail outlet on HGV route means pedestrians and motorists would encounter large waste vehicles as they sought to access the local shopping facilities
- St Andrew's Church has a very active and well used Church Hall which is in most days often used with babies, children and elderly people having to negotiate the pinch point and dangerous bend to access and exit our hall and car park
- Residential properties are close to the A245 all along Between Streets, where for example residents of over 100 retirement flats would have HGVs carrying waste material passing within a few metres of their window over a 9 month period.

Flood Risk

- An increase in non-permeable surface area at the golf course will aggravate the flooding seen last winter at Chertsey etc.
- No details have been given of a survey of existing drains to establish if they are clean and free from blockages, flooding is inevitable in the absence of drainage
- The surface of the proposed lake will be above ground level, held in by built up banks. The banks are only 1 metre above the intended surface level so if it rains heavily and persistently then flooding East Horsley will be inevitable
- Changing ground levels and drainage patterns will have a much wider impact on the residents of East Horsley and Ockham
- In times of rainfall many of the fields between Ockham and The Drift are saturated with water and the sewers frequently discharge both in the fields and in the roads, notably in Ockham Lane
- There will undoubtedly be soil compaction during the waste soil being spread which will lead to poor water percolation to the drains

Heritage Assets

- Concerned at the real threat of structural damage caused by vibration to the two Grade 2 listed houses on The Drift – *North Forest Lodge and Blue Ryde Lodge*
- Damage to the foundations of listed buildings due to many lorries
- I trust that SCC now feels a similar obligation to protect this Conservation Area from totally unnecessary foundation-shaking, waste dumping HGV traffic
- Three conservation areas: the Church Cobham area around St. Andrew's Church, Plough Corner and Downside Villages. Each of these important conservation areas includes properties of national importance, many of which do not have foundations. Adding extra HGV trips could cause significant damage to properties close to the road. The conservation areas would suffer increased noise and dirt pollution from these additional vehicles
- The Medicine Garden is an important heritage site and local business: its range of alternative activities, cafes and musical events would suffer from an increase in noise along the road

- Also along the route is Park Farm another ancient half-timbered house on the Downside Road, which like Pyrports is close to the road and can suffer increased degradation
- The proposed route passes close to the ancient and historical building of Pyport's, a grade 2 listed building with unusual features and a long history, believed to have been constructed in the late 16th century

Metropolitan Green Belt

- No exceptional circumstances have been provided to justify the application in line with NPPF requirements regarding the Green Belt
- The dumping of any waste for private profit or otherwise, on the Metropolitan Green Belt, is unacceptable in principle
- How can they claim that the openness is maintained when they propose to erect a barrier 92m long and over 4m above the level of the car park? Currently openness is maintained with views from The Drift over the golf course extending over 600m to the golf courses northern tree lined boundary and the higher ground beyond. The practice bay structure will reduce this view to less than 250m provide a hard edge to the car park and making the car park far more evident than currently
- The proposed building and the tipping of waste are inappropriate developments in the Greenbelt. The move towards self-sufficiency in water by harvesting can be achieved without tipping waste, the provision of covered driving bays are not essential for a game that is regarded as all weather
- The size, extent, scope and aims of the scheme represent an inappropriate and unjustified development and intrusion into the existing Green Belt and surrounding countryside amenity
- Protecting the Green Belt benefits the public in general, wherever they live, in perpetuity and regardless of wealth and social status
- Why should the Surrey Green Belt import any waste, toxic or not, solely for the profit of a private company so they can finance a development expansion? Where are the NPPF- required "exceptional circumstances?" The applicants should be questioned about the role of the waste material in the financing of the scheme

General Comments

- Schemes such as this might be acceptable to provide public amenities or housing it is not to be thought of in order to provide facilities for a sport already in quite considerable decline
- The method of achieving the proposed improvements seems to be totally impractical
- The only justification for the ridiculous proposal would be if it was to fix some major local issue. Increasing the supply of golf practice facilities in an area of the country already well supplied in this regard does not even come close to being a reasonable justification
- No objection to The Drift Golf Club proposal for their driving range but have the strongest possible objection to their modus operandi and it must not be allowed to happen
- This proposal will decimate the local community
- Absolute madness and a disaster for small village communities already overrun with traffic
- The proposed project is far too large and ambitious for its quiet and inaccessible rural location
- Cost-benefit ratio is not reasonable
- The publicity about this proposal has been minimal
- The many planning applications that the Horsley's are constantly being bombarded with will totally change the quality of the lives of the people who enjoy the tranquillity of the Surrey countryside. The threat of the new town at Wisley Airfield, the new Local

Plan about to be unleashed upon us and our local roads have seen a huge increase in the numbers and size of vehicles using them over the 30 years, we don't wish to put up with nine months of upheaval

- The references to the “general public, schools” etc. are similarly a transparent attempt to bolster the application’s social credentials as part of a claimed sustainability mix. These are unspecific, cannot be guaranteed or enforced and if the Club really has a social consequence could be provided without the need for the proposed development
- Should SCC be minded to approve this application, which I hope they do not, then a bond of at least £500,000 should be required from the applicants before any work commences. This bond not to be the limit of compensation to SCC

PLANNING CONSIDERATIONS

Introduction

85. The guidance on the determination of planning applications contained in the Preamble/Agenda front sheet is expressly incorporated into this report and must be read in conjunction with the following paragraphs.
86. In this case the statutory development plan for consideration of the application consists of the [Surrey Waste Plan 2008 \(SWP\)](#), the [Elmbridge Core Strategy 2011 \(ECS\)](#), the [Elmbridge Development Management Plan 2015 \(EDM\)](#), and the [Guildford Local Plan 2003 \(GLP\)](#).
87. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations. For planning applications accompanied by an Environmental Statement (ES) the environmental information contained in it will be taken into consideration and reference will be made to it.
88. In assessing the application against development plan policy it will be necessary to determine whether the proposed measures for mitigating any environmental impact of the development are satisfactory. In this case the main planning considerations are: sustainable waste management; highways, traffic and access; air quality and noise; flood risk; landscape and visual impact; ecology; heritage assets; and the Metropolitan Green Belt.

SUSTAINABLE WASTE MANAGEMENT

Development Plan Policies

Surrey Waste Plan 2008

Policy CW4 – Waste Management Capacity

Policy CW5 – Location of Waste Facilities

Policy WD2 – Materials Recovery

Policy WD7 – Land raising and Engineering Operations

Policy WD8 – Land raising and Engineering Operations

Guildford Local Plan 2003

Policy G1(10) – Conservation of Water Resources

Policy Context

89. In England, the waste hierarchy is both a guide to sustainable waste management and a legal requirement, enshrined in law²⁹. The hierarchy gives top priority to waste prevention,

²⁹ [The Waste \(England and Wales\) Regulations 2011](#)

followed by preparing for re-use, then recycling, other types of recovery³⁰ and last of all disposal.

90. The [National Planning Policy Framework 2012 \(the Framework\)](#) does not contain policies relating to waste management. Instead national waste management policies are contained within the [Waste Management Plan for England 2013 \(WMP\)](#) and set out by the [National Planning Policy for Waste 2014 \(NPW\)](#).
91. The WMP advocates that the dividends of applying the waste hierarchy will not just be environmental but explains that we can save money by making products with fewer natural resources, and we can reduce the costs of waste treatment and disposal. It envisages that the resulting benefits of sustainable waste management will be realised in a healthier natural environment and reduced impacts on climate change as well as in the competitiveness of our businesses through better resource efficiency and innovation – a truly sustainable economy. Similarly, the NPW sets out the Government’s ambition of working towards a more sustainable and efficient approaches to waste management by driving waste up the waste hierarchy. In this context the Framework, at paragraphs 18 and 19, explains that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future, and ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.
92. The NPW states that when determining planning applications the CPA should: (a) consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B of the NPW and the location implications of any advice on health from the relevant health bodies but that the CPA should avoid carrying out their own detailed assessments in these respects; (b) ensure that waste management facilities in themselves are well-designed so that they contribute positively to the character and quality of the area in which they are located; and (c) concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities³¹. The CPA should work on the assumption that the relevant pollution control regime will be properly applied and enforced.
93. The SWP explains at paragraph B30 that the SCC remains committed to achieving net self-sufficiency, enabling appropriate development that implements the waste hierarchy and ensuring that the County delivers its contribution to regional waste management. In this context paragraph B32 goes on to state that a range of facilities, type, size and mix will be required, located on a range of sites to provide sustainable waste management infrastructure in Surrey. Consequently, policy CW4 of the SWP requires planning permissions to be granted to enable sufficient waste management capacity to be provided to manage the equivalent of the waste arising in Surrey, together with a contribution to meeting the declining landfill needs of residual wastes arising in and exported from London, by ensuring a range of facilities are permitted.
94. Policy CW5 of the SWP sets out the approach that should be taken in respect of the location of waste management facilities. Generally, waste management facilities should be suited to development on industrial sites and in urban areas giving priority over greenfield land to previously developed land³². However, it recognises that opportunities for waste management facilities in urban areas are limited, so land beyond needs to be considered. The development is not a ‘facility’ per se but rather a waste management ‘activity’ which

³⁰ Including energy recovery and other beneficial uses

³¹ In this case the Environment Agency and the relevant Borough Council's

³² Where there is an absence of landscape, and international and national nature conservation designations; and where the site is well served by the strategic road network or accessible by alternative means of transport

comprises a land raising operation. In this respect policy WD2 of the SWP states that permission for development involving the recovery of waste will be granted at existing or proposed waste management sites, subject in the case of land raising sites or other temporary facilities, to the waste use being limited to the life of the land raising or other temporary facility.

95. The proposal seeks, in part, to make the golf club can become self-sufficient in terms of water supply for irrigation purposes. Accordingly, the design of the practice range outfield takes account of the proposed rainwater harvesting scheme and the proposed water storage lake. This aspect of the development would be facilitated by engineering imported inert waste materials on the site. Consequently, policy G1 (10) of the GLP is considered relevant to the proposal. This states that development will be permitted if the design, layout and landscaping is efficient in the use of water.
96. Landfill is commonly used to fill voids left by mineral working and to achieve restoration of the site. Land raising developments are not as common. Whilst land raising activities are often considered inappropriate, such development can be beneficial. Examples include re-grading a steep slope to bring land into agricultural use. Land raising activities can also restore previously derelict and disturbed land to enable a more positive and beneficial use³³. Inert wastes are often used in engineering operations such as the construction of landscape or noise mitigation bunds. Such land raising activities might be linked to new development and so may make good use of the resultant spoil. In these circumstances these are likely to be sustainable benefits gained from using the spoil in a project close by, rather than transporting it to a more distant facility³⁴. However, it is important that mineral workings are properly restored within the County and this should not be prejudiced by the lack of suitable material³⁵. The SWP requires land raising schemes to result in not just small changes but that the activity makes a fully beneficial contribution with substantial improvement to the quality of the land. Proposals will also be expected to limit the quantity of deposited waste to the minimum necessary³⁶.
97. In this context policy WD7 of the SWP is clear that planning permission will only be granted for engineering operations provided: (a) the waste to be disposed of cannot practicably and reasonably be reused, recycled or processed³⁷ or may otherwise be required for the restoration of mineral workings; and (b) the proposed development is both essential for and involves the minimum quantity of waste necessary³⁸; and (c) the proposed development does not prejudice the satisfactory restoration of mineral working sites in the locality, having regard to the supply and availability of appropriate waste materials.
98. Notwithstanding the above, to ensure that the potential benefits of engineering works are maximised such proposals must include consideration of the final use of land including proposals for a high quality of restoration and long term management plans for the restored site. The finished levels of a restored site may be higher than adjoining land. However, they will still be expected to incorporate high quality standards of restoration of the site that are appropriate to the surrounding landscape³⁹.
99. Consequently, policy WD8 of the SWP requires proposals for engineering operations were appropriate, should: (a) incorporate finished levels that are compatible with the surrounding area and any likely settlement. The finished levels should be the minimum required to

³³ Paragraph C29 of the SWP

³⁴ Paragraph C35 of the SWP

³⁵ Paragraph C36 of the SWP

³⁶ Paragraph C30 of the SWP

³⁷ To recover materials - produce compost, soil conditioner, inert residues etc.

³⁸ For the purpose of restoring current or former mineral workings sites; or facilitating a substantial improvement in the quality of the land; or facilitating an appropriate after use; or improving land damaged or disturbed as a result of previous or existing uses and where no other satisfactory means exists to secure the necessary improvement; or the engineering or other operations

³⁹ Paragraph C38 of the SWP

ensure the satisfactory restoration of the land for an agreed after use; (b) include proposals for aftercare; and (c) make provision where practical for appropriate habitat creation for biodiversity benefit.

The Development

100. In 2014 Surrey managed some 2,038,000 tonnes of inert waste of which 978,000 tonnes arose within the County and 1,060,000 tonnes was imported from elsewhere. The amount of this waste landfilled in Surrey in the same year was 1,242,000 tonnes or some 61%. Accordingly, [SCC's Annual Monitoring Report 2014/2015](#) explains⁴⁰ that available waste management capacity in Surrey is predominantly landfill which in line with the WMP and NPW is considered to be the least preferable option for waste management. Although a high proportion of Surrey's waste is being managed through reuse, recycling and recovery, a lack of facilities for recycling and recovery within the County means that Surrey is still reliant on landfill capacity to be considered net self-sufficient.
101. Since 2009 the total amount of inert waste managed in the County has increased⁴¹. Officers consider that this trend is likely to continue beyond the period of the SWP in line with construction activity in the South East and London. The development proposed would provide for some 87,805 tonnes of additional waste management capacity amounting to about 4% of the total amount of inert waste imported into the County in 2014. It is likely that this share is an underestimation of the volume of waste imported to the County in 2016 apart from waste arising from within the County. For these reasons Officers consider the development compliant with policy CW4 of the SWP.
102. Setting aside any adverse implications of importing 87,805 tonnes of inert waste to the application site as proposed, from a waste management perspective it is recognised by Officers that the engineering aspects of the development seeks to use waste arising and imported to the County for a beneficial purpose. The applicant has explained that remodelling of the practice ground outfield, the new short game academy, and the water storage lake are vital components of the club's ambitions to raise the quality of its existing teaching and practice facilities and to create a centre of teaching excellence. The development would also provide for about 30,000m² of new habitat and would result in the golf club employing two new full-time professional teaching staff. It is also projected that the development would result in an increased use of the practice ground outfield thereby providing additional revenue to an existing business. In this context Officers consider that the use of waste to facilitate the development proposed as an alternative to the use of primary material to achieve the same would amount to the 'recovery' of waste managed in Surrey.
103. The development is to set to be completed within a temporary period of 9 months but would take no longer than 12 months. The application site is not covered by any landscape designations or national or higher-level nature conservation designations which Natural England's consultation response confirms. Land raising activities are to take place on and around the immediate vicinity of an existing practice range and large car park and would not result in the loss of greenfield land. In respect of access to the strategic road network and the scale of the development the County Highway Authority has not objected to the development, including the proposed HGV haulage route to and from the A3, subject to a s278 legal agreement and a range of conditions to secure the mitigation measures proposed by the applicant. Similarly, Highways England has not objected to the development having regard to the A3 and M25. For the reasons given in this and the preceding paragraph Officers consider that the development satisfies policies WD2 and CW5 of the SWP.

⁴⁰ At paragraphs 5.3.6 and 5.3.7

⁴¹ Surrey County Council Annual Monitoring Report 2014/2015, paragraphs 5.2.22 to 5.2.24

104. On the basis of Officers' experience it is considered that the materials to be used to facilitate the development are likely to arise from construction, demolition and excavation (CDEW) sites within a 30 mile radius of the application site including London. Considering the strong emphasis on the application of the waste hierarchy in the development industry and the economics of reuse, recycling or recovery of waste over its disposal to landfill, Officers share the applicant's contention that a significant proportion of the waste material to be deposited on the application site is unlikely to be suitable for reuse or recycling for various reasons⁴². Reuse, recycling or recovery of inert waste on or off-site is generally much cheaper than disposal which attracts a financial penalty in the form of a financial tax. Consequently, Officers consider that the development would attract inert waste that would not otherwise be recycled or reused. As discussed in the preceding paragraphs, large volumes of waste are managed in Surrey based upon the substantial volume imported from London and elsewhere. Consequently, having regard to the limited duration of the development, Officers consider that any impact the proposal may have on the restoration of mineral workings in the locality⁴³ is considered unlikely to be significant. It is notable that the CPA has not received any objection to the proposal from mineral operators in Surrey, and that in 2013/2014 no mineral workings sought to extend the time-period for restoration as a result of a lack of inert waste material⁴⁴. In these respects Officers consider that the development complies with parts (a) and (c) of policy WD7 of the SWP.
105. In order to be fully compliant with policy WD7 the applicant is also required to demonstrate that the land raising proposed is both essential and involves the minimum quantity of waste necessary. Section 3.6 of the applicant's Environmental Statement sets out alternatives to the land raising proposed including a 'do nothing scenario'; alternative sites for the existing practice range; and alternative designs and construction methods.
106. The applicant claims that the 'do nothing scenario' is not a reasonable option given that the existing practice range is in an appalling state with poor drainage leading to it being unusable in the wetter months resulting in additional expense and a loss of income. The applicant contends that as an existing local business it needs to continually adapt and improve its services to compete in the local market. Objectors have highlighted the competitive market relating to the local 'golf course industry' by pointing to the number of golf courses in the County. Moreover, current irrigation water supply arrangement is becoming increasingly unsustainable in terms of its environmental and financial impact. The development would make the golf club self-sufficient in terms of irrigation water supply. Accordingly, the applicant submits that the absence of the development proposed will adversely affect the long-term financial performance of the existing business and in turn its future security. [Guildford Borough Council's Landscape Character Assessment 2006](#) identifies that the application site is sits on heavy clay soil thereby subject to land-drainage problems and summer soil cracking. These problems are compounded by a high water table. Having visited the site Officers concur that the state of the practice range is in a poor condition as described by the applicant. Photographic evidence of the state of the practice range has been provided by the applicant⁴⁵.
107. Officers accept that relocating the existing practice range would not be environmentally acceptable or practical given that the golf course is set within ancient woodland. Cut and fill operations were considered by the applicant so as to raise the required volume of engineering material. However, there is little free space for the creation of sufficient 'borrow' areas without adversely impacting ancient woodland and other habitats. Officers

⁴² Including its provenance and proximity to sites where these activities are undertaken; physical characteristics; and composition

⁴³ Coldharbour Lane; Stanwell Quarry; Runfold South Quarry; Land west of Queen Mary Reservoir; Homers Farm; Oxted Sandpit; Molesey Reservoir; Reigate Road Quarry; Hithermoor Quarry; Hengrove Farm; Oxted Chalk Pit; Homefield Sandpit; Mercers South Quarry

⁴⁴ See Appendix 1 of Surrey County Council Annual Monitoring Report 2014/2015

⁴⁵ Pages 20 to 22 of the applicant's Environmental Statement; pages 10 to 15 of the applicant's Design and Access Statement dated June 2016; and pages 50 to 51 of the applicant's Landscape and Visual Impact Assessment dated June 2016

acknowledge that this is a reasonable conclusion to reach having regard to the nature and location of the golf course and land surrounding. It is also recognised that the applicant has in the past tried to improve the drainage characteristics of the practice range using sub-surface drainage pipes but this failed due to extremely flat profile of the outfield and a high water table which does not allow for surface water to be collected away from play areas⁴⁶. The practice range outfield occupies one of the lowest and flattest areas of the golf course. Accordingly, the applicant considers that re-profiling of the practice range to create effective cross falls with invert levels that work efficiently with modest sub-surface drainage⁴⁷ represents the most sustainable and ecologically sound method of ensuring the existing facility remains fit for purpose. Supporting this conclusion is the '[Guidelines for renovation and maintenance of football pitches](#)' produced by the Institute of Groundsmanship and the Football Association which specifies that sports pitches should have minimum cross fall of 1.5%⁴⁸ in order for the drainage network to be effective and that cross falls alone on poorly draining soil would not be enough to drain effectively without a subsoil drainage network. In the circumstances therefore Officers consider the approach adopted by the applicant in seeking to remedy the drainage characteristics of the range outfield to be reasonable and proportionate.

108. In 2010 the applicant obtained planning permission from Guildford Borough Council to create a water storage lake to provide additional irrigation water for the golf course. This permission has not been implemented and so has lapsed. The lake consented to in 2010 was 50% larger in size to that now proposed, generally in the same location, and no waste was to be imported to the golf course to facilitate its construction. The 2010 lake was not connected to the remodelling of the practice range outfield for water harvesting and included no habitat creation. It was to draw water from a local water course and is likely to have resulted in the loss of trees. For these reasons the applicant considers that lake consented to in 2010 would not have provided for the sustainable irrigation of the golf course or the wider economic and environmental benefits to be gained by the proposed development.
109. The proposed lake as shown on Drawing Ref. 551.08 Rev C – Drainage and Water Harvesting Plan dated 6 June 2016 would involve a combination of cut into the existing ground and earth bunding to allow for a proportion of the 11,000m³ of water to be stored to be above existing ground level. The bunding would comprise a mixture of site derived and imported material. The lake is to be used for irrigation purposes and therefore has been designed for large variations in water level and volume. Water is to be provided by surface water harvested from the practice range outfield not ground water and therefore it is necessary to line the lake with an artificial liner. However, in order to prevent ground water pressure causing damage to the liner this pressure has to be balanced with just enough water in the lake below ground level. It is not possible to store over 10,000m³ of water above ground level without triggering requirements relating to the Reservoirs Act. Further, the more water stored above ground level the more material is required for larger and more extensive containment bunding. In designing the lake consideration has also been given the efficiency of pumps and power demands associated with the intended irrigation system. Officers are satisfied that the proposed lake has been well considered and designed and is proportional to the applicant's ambitions of becoming self-sufficient in irrigation water supply. Moreover, Officers are in no doubt that in the context of climate change, harvesting and storing of winter rain on the application site for irrigation purposes in the summer so as to sever the golf club's reliance on mains water supply would be environmentally and economically sustainable for both the golf course and society in general as set out by literature published by the British and International Golf Greenkeepers Association⁴⁹ and the Environment Agency⁵⁰ to this effect. Such severance

⁴⁶ Remnants of the failed sub-surface drainage installed can be seen in aerial photographs of the practice range outfield

⁴⁷ As shown on Drawing Ref. 551.08 Rev C – Drainage and Water Harvesting Plan dated 6 June 2016

⁴⁸ The proposal includes cross falls of between 3% and 5%

⁴⁹ [Drought A Special Report, BIGGA](#)

⁵⁰ [Assessing optimum irrigation water use: additional agricultural and non-agricultural sectors, Science](#)

would bring about environmental benefits and economic benefits for an existing local business.

110. Bar a small single practice putting green adjacent to the existing practice range teeing area and car park, the golf course lacks a short-game practice facility. These are common features on golf courses. The applicant asserts that the state of the art new short game academy would complement the improved practice range outfield and provide teaching staff with further structure to their teaching programmes as part of a centre of teaching excellence. Similarly, it is submitted that the proposed covered practice bays and associated rooms would complement the proposals for the practice ground outfield and short game academy in that it would provide a first rate environment in which to conduct individual tuition, group clinics, society lessons, school and holiday tuition etc. Officers consider that these are reasonable aspirations for an existing golf course facility. Guildford Borough Council has objected to the appropriateness of the proposed building in respect of the Green Belt, and some objectors have raised concerns about its size and visual and landscape impact. Having considered the applicant's Landscape and Visual Impact Assessment SCC's Landscape Architect has concluded that the building is not out of character with the nature of the land use as a golf course and has therefore not raised objection to this aspect of the development. The impact of the building on the Green Belt is discussed below in the relevant section of this report.
111. Similarly, SCC's Landscape Architect has assessed the proposed land raising activities and concluded that although they would affect the character of the local landscape in a particular section of the golf course so that it appears more formal, the contours proposed are sympathetic with the surrounding landscape form such that they maintain and respect the underlying landscape character. In this regard no objection has been raised by the landscape architect subject to a 10-year Landscape and Ecology Management Plan. Officers agree with this assessment and therefore it is considered that the proposal is essential to the future security of the existing business and that it involves the minimum quantity of waste necessary to improve the drainage characteristics of the practice range, effect the intended water harvesting and irrigation scheme, and facilitate the development of a centre of teaching excellence. In the circumstances Officers consider that the development has been well-designed so that, upon completion, it would contribute positively to the character and quality of the golf course. This would result in a substantial improvement to the quality of the same. Accordingly, having regard to the Landscape Architect's views and considering paragraphs 105 to 110 above, Officers contend that the development satisfies part (b) of policy WD7 of the SWP. For the same reasons and having regard to the additional habitat and ecological improvements to be provided for by the development and the Landscape and Ecology Management Plan to be secured by way of condition Officers consider that the development satisfies policy WD8 of the SWP.
112. Objectors have raised various questions about the suitability of the waste to be deposited and pollution that may arise as a result. Concerns have also been voiced about the profits to be made by applicant in respect of the waste to be received. These are not matters that should or could be taken into account in determining the proposal with former being a matter for the pollution control authorities whom the CPA should assume would be effective and the latter not a material planning consideration. The Environment Agency has advised that the development would require the benefit of an Environmental Permit and the CPA should assume that this regulatory regime would operate effectively. Concerns have also been raised about the effectiveness of development monitoring. The National Planning Practice Guidance⁵¹ advises that planning conditions should be imposed on a planning permission to mitigate the impacts of development and to make development acceptable. Accordingly, conditions to be imposed on any permission granted in relation to the waste management aspects of the proposal would be necessary, relevant to planning and the development, enforceable, precise, and reasonable in all other

respects⁵². They would include measures to control the duration of the development, volume of waste to be imported, land raising levels, hours of operation, HGV delivery times, and HGV routing. The County Highway Authority will also seek to secure the highway mitigation measures offered by the applicant by way of a legal agreement.

Conclusion

113. Having regard to paragraphs 100 to 112 above, Officers consider that the development satisfies policies CW4, CW5, WD2, WD7, and WD8 of the SWP and policy G1(1) of the GLP.

HIGHWAYS AND TRAFFIC

Development Plan Policies

Surrey Waste Plan 2008

Policy DC3 – General Considerations

Guildford Local Plan 2003

Policy G1(2) – Transport provision, Access, Highway Layout and Capacity

Elmbridge Core Strategy 2011

Policy CS25 – Travel and Accessibility

Elmbridge Development Management Plan 2015

Policy DM7 – Access and Parking

Policy Context

114. The Framework is clear that development should only be refused or prevented on transportation grounds where the residual cumulative impact of development is severe. This guidance also advocates⁵³ that all development that would generate significant amounts of movement should take account of whether (a) opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, (b) safe and suitable access to the site can be achieved for all people, and (c) improvements can be undertaken within the transport network.

115. Appendix B of the NPW states that in testing the suitability of sites for waste management the CPA should bear in mind the envisaged waste management facility in terms of its nature and scale and consider the suitability of the road network and the extent to which access would require reliance on local roads.

116. Policy DC3 of the SWP requires that applicants demonstrate, by the provision of adequate supporting information, that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people, land, infrastructure and resources. The policy goes on to state that the supporting information should include, where appropriate, an assessment of traffic generation, access and suitability of the highway network, and mitigation measures to minimise or avoid material adverse impact and compensate for any loss.

117. Policy CS25 of the ECS promotes improvements to sustainable travel, and accessibility to services, through a variety of measures. It seeks to direct new development that generates a high number of trips to previously developed land in sustainable locations within the urban area⁵⁴ and promotes the delivery and use of sustainable transport. It advocates protection of existing and delivery of new footpaths, cycleways and bridleways thereby increasing permeability and connectivity within and outside the urban area. The policy also seeks to improve mitigate the detrimental environmental effects caused by transport particularly with regards to HGVs. In this respect it references air quality, noise

⁵² As per paragraph 206 of the Framework

⁵³ At paragraph 32

⁵⁴ Town centres and areas with good public transport accessibility

and the Elmbridge Air Quality Strategy. The air quality and noise implications of the development are discussed in the relevant section of this report below.

118. Policy DM7 of the EDM requires the layout and siting of accesses to and from the highway to be: (a) acceptable in terms of amenity, capacity, safety, pollution, noise and visual impact; and (b) safe and convenient for pedestrians, cyclists and motorists. It also requires provisions for: (c) loading, unloading and the turning of service vehicles which ensure highway and pedestrian safety; and (d) minimising the impact of vehicle and traffic nuisance, particularly in residential areas and other sensitive areas.

The Development

119. A significant majority of the public objections to the development concern its perceived highway, traffic and access implications. Similarly Parish Councils and amenity societies, and the respective Borough Councils, consulted in respect of the proposal have objected to the development on the same grounds. These concerns are registered in paragraphs 46 to 60 above.
120. The development would involve, over a minimum period of 9 months, some 6,097 HGV trips⁵⁵ on a one way circular route. This would equate to about 33 HGV trips⁵⁶ per day on a route from the A3 through the villages of Cobham, Downside, Effingham and Ockham before reaching the A3 again. In this respect HGVs would only be permitted to use the A245, Downside Bridge Road, Downside Road, Horsley Road, Forest Road, The Drift, the B2039 and Ockham Road North. In order to facilitate access via The Drift the proposal includes 5 temporary passing bays and a range of traffic management measures⁵⁷. Although the development at large would take place from 0700 until 1630 hours Monday to Friday, HGVs would cease to access the site between 0800 and 0900 hours and by 1430 hours to avoid peak traffic and school drop off and pick up times. No working at all would take place over the weekends or holidays. The route for construction vehicles is within 100m of the Cobham High Street AQMA and passes three Conservation Areas and a number of Grade I and II Listed Buildings in Cobham and Downside. There are two Grade II Listed dwellings on The Drift which empty HGVs would pass on their return to the A3. Footpath No. 559 crosses The Drift road to form footpath No. 561 whilst footpath No. 562, which runs from The Highlands road, ends at The Drift road. The implications of the development in relation to heritage assets, air quality and noise are discussed below in the relevant sections of this report.

The Drift

121. The site is to be accessed via the The Drift road which is largely a single-track unclassified road. It also forms part of public byway No. 516. Part of the road surface is badly broken up and the verges have been over-run in places where cars have used them as informal passing places. The road is subject to a 7.5 tonne weight restriction with an exception for loading. It is also subject to the National Speed Limit, which is 60 mph. The 85th percentile speed is around 35 mph and the mean speed around 30. There are warning signs for deer, pedestrians in the road and road narrowing. There is a toad tunnel and a culvert⁵⁸ under the road and the maximum loading on these are unclear. The only vehicular access to the golf club is via The Drift. The County Highway Authority requested that the applicant consider a range of alternative access arrangements⁵⁹ and it has been demonstrated that there are none available.

⁵⁵ Some 12,194 HGV movements

⁵⁶ Some 66 HGV movements

⁵⁷ Including over run strip; temporary traffic lights and warning signs

⁵⁸ Both to the west of the existing access to the Golf Club and therefore along the egress route for empty HGVs

⁵⁹ As discussed in Section 14.3 to 14.46 of the applicant's Environmental Statement dated June 2016

122. In view of the constraints of The Drift, the applicant is proposing a number of measures to mitigate and manage the impact of the HGVs generated by the proposal. HGVs accessing the site will travel along The Drift in one direction only – they will enter from the north east via Forest Road and exit to the south west via Ockham Road North. HGVs associated with the works will therefore not meet one another on The Drift and need to pass, except at the site access where space can be made within the site to accommodate this. A traffic count was undertaken in February 2013 which resulted in a weekday average of 2,096 vehicles, including 65 HGVs⁶⁰. Given the limited number of properties along The Drift, this seems a high number of vehicles with a legitimate reason to be using the lane and it is likely that some of these HGVs were using it as a short cut. The number of deliveries to the site per day is proposed by the applicant to be limited to 33 and this can be controlled by condition.
123. The informal passing bays on The Drift are proposed to be surfaced and formalised for the duration of the works and removed once the works are complete, with the intention not to permanently alter the character and nature of the road. The narrowest section at the two dwellings will be managed by traffic signals which will only allow alternative one-way working for all vehicles. The signals will only be operational during the hours of deliveries. They will be non-operational at other times. There is a fine balance between providing adequate mitigation and not permanently altering the character and appearance of The Drift. This is important in so far as the setting of the two Listed Buildings is concerned which is discussed in the 'Heritage Assets' section of this report. Similarly, the impact of the temporary passing bays on ecological assets is discussed in the relevant 'Ecology' section of this report.
124. Should the proposal be found to be acceptable, there will be a requirement for a s278 Agreement under the Highways Act 1980 in order to undertake the works to The Drift. This agreement will also ensure that the road is reinstated after the works have been completed. Concern has been expressed about the state of the road surface along The Drift, which admittedly is poor, and the applicant has agreed to undertake before and after surveys and to fund works to make good any damage caused by their development. This can also be included in the s278 agreement. There is a culvert towards the Ockham Road South end of The Drift. The applicant will need to confirm that the structure is able to accommodate the weight of un-laden HGVs prior to the commencement of any operations. Additionally, a Stage 2 Safety Audit will need to be carried out on the detailed design of the mitigation/traffic management measures on The Drift. A Stage 1 Safety Audit has been undertaken and a designer's response submitted.
125. Some objectors have raised concern about the long-term increase in vehicle movements along The Drift as a result of improved facilities at the golf club. The development would lead to an increase in usage of the facilities over the summer⁶¹ and winter⁶² months as a consequence of the covered practice bays and improved ascetics of the outfield. However, these increases are on average likely to equate additional 12 and 4 daily users of the facility during the summer and winter months respectively. Such an increase in daily usage is unlikely to materially affect overall traffic on The Drift and surrounding roads.

Wider Access Route

126. The proposed wider access route was amended following further consideration and assessment by the applicant. Both the original and proposed routes involve vehicles passing schools and residential properties and there are also highway constraints in places on both routes. The applicant considers, on balance, that the proposed route via Cobham is preferable to the route via Clandon and Horsley. This part of the proposed route

⁶⁰ About 3%

⁶¹ As indicated by the overall increase of 9.35% in the high season – Figure 22a of the applicant's Environmental Statement dated June 2016

⁶² As indicated by the overall increase of 11.42% in the low season – Figure 22a of the applicant's Environmental Statement dated June 2016

involves A-class roads, the A3 and the A245. These are principal traffic routes without any restrictions on the type of vehicle that they can carry. It has been suggested that the junction of the A245/A307 and the A245 Between Streets is not suitable for HGVs. This junction and stretch of road is currently being used by around 17,740 vehicles per day⁶³ of which around 400 or 2% are HGVs. An additional 33 equates to an 8% increase in HGVs and a 0.2% increase in overall traffic. It is therefore considered suitable by Officers.

127. The Cobham and Downside residents association and other interested parties have objected on the grounds that Cobham cannot absorb any more HGV traffic as there are often hold ups and congestion. Given the low numbers of HGVs involved, it is not considered that the development will materially worsen the existing situation. It is for a finite period, as with many building projects, and any increase is in any case therefore temporary.
128. Downside Bridge Road has a pinch point between St Andrews Church, Cobham and the Pyrports where the road narrows and there is an historic wall and tree immediately adjacent to the carriageway. This has been raised by the St Andrews Church Warden and other interested parties as a problem as it is a popular route for cyclists, may potentially jeopardise the listed walls, mirrors may overhang the narrow pavement and impact upon pedestrians and vehicles will impact upon those accessing/egressing the church hall. This stretch of road can accommodate a goods vehicle but it requires other traffic approaching from the opposite direction to stop or proceed slowly with caution. This is an existing situation and can cause some queuing at peak times. There do not appear to be any recorded personal injury accidents at this location. There is one further south adjacent to the church hall but that was an accident involving a car and a pedestrian.
129. The road narrows again in the bends adjacent to Curtain Pond Cottages, Park Farm and Cobham Stud. The applicant commissioned classified traffic counts at three points along the Downside Bridge/ Horsley Road/Forest Road. These were by way of tubes across the carriageway in mid-September 2015. The first was adjacent to Curtain Pond Cottages, the second adjacent to St Matthews School and the third on Forest Road south of the junction with Effingham Common Road. The County Highway Authority's analysis of the resulting traffic count data indicates that the stretch of Downside Bridge Road adjacent to Curtain Pond cottages generates a weekday 18-hour average of 7,669 two-way vehicle movements of which 403 were larger goods vehicles. An additional 33 vehicles would result in an 8% increase in goods vehicles and an increase in total traffic of less than 1%. The stretch adjacent to St Matthews School generates a weekday 18-hour average of 6,898 two-way vehicle movements of which 370 or 5% were larger goods vehicles. In this case, an additional 33 vehicles would result in a 9% increase in goods vehicles and an increase in total traffic of less than 1%.
130. The Forest Road section of the route is more lightly trafficked than the Downside Bridge Road/Horsley Road stretches. The weekday 18-hour average is 4,995 two-way vehicle movements of which 224 or 4% were larger goods vehicles. The additional 33 vehicles would result in a 15% increase in goods vehicles and, again, an increase in total traffic of less than 1%.
131. Clearly therefore, the greatest impact in goods vehicle traffic generation terms will be on the Forest Road stretch of the route. This is predominantly residential but is reasonably straight and of adequate width to permit two goods vehicles to pass. There are a number of school buses that pick up along the road and pedestrians, including school children, utilising the road to access Effingham Junction station.
132. Traffic can fluctuate on a daily basis by + or – 10%. Projected changes in traffic of less than 10% will create no discernible environmental impact⁶⁴. Guidance⁶⁵ further indicates

⁶³ In 2014, source Department for Transport

⁶⁴ Institute of Environmental Assessment, 'Guidelines for the Environmental Assessment of Road Traffic'

that a 30% change in traffic flow⁶⁶ should be the starting point for the assessment of the environmental impact of traffic. In this case, the impacts on the A245 and Downside Bridge/Horsley Road/Forest Road are all below 30% indicating that any impacts would be slight.

133. The route will also involve HGVs passing St Matthews Infant School and Downside nursery. These are highly sensitive receptors, especially at drop off and pick up times. The applicant has committed to excluding HGV deliveries to avoid the peak school times. As other HGVs using this route are not bound by these times, this will not eliminate HGVs completely but it will ensure that no vehicles associated with the proposal pass at these times thereby maintaining the status quo. This will also have a positive impact on children accessing school buses and Effingham Junction station from Forest Road in the morning as they will not be affected by the passage of HGVs associated with the development either. It will also ensure that there are no HGVs on this route during the morning peak when overall network traffic flows are at their highest. This is equally true of the egress route via Ockham Road North as if there are no vehicles entering, there will be none leaving.
134. Historically, part of the HGV route was used for access to the Cobham motorway services construction site during site set up and whilst temporary on and off slips to the M25 were constructed. This involved up to 20 HGV movements per day for an 8 week period. Additionally, there is a timber yard generating HGV movements adjacent to Park Farm, two goods vehicle operating centres at Newmarsh Farm and Cedar Nursery with around 45 authorised vehicles between them and a number of other goods vehicle generating uses along and/or accessed from this route. It is clear that there are already a number of uses already legitimately generating HGV movements along this route. Of the 32 recorded personal injury accidents in the last 5 years along the route, only 1 involved an HGV⁶⁷ and 2 involved LGVs. Twenty of the accidents involved single vehicles with a combination of causes ranging from carelessness and speeding to drink driving and slippery conditions. There is no evidence to suggest that an increase in 33 HGVs Monday to Friday between the hours of 0700 to 0800 and 0900 to 1430 for a limited period of 9 to 12 months would contribute to unsafe driving conditions along the proposed route. Reference is made to the numbers of cyclists using this route and this is acknowledged. This is however an existing situation and drivers will need to remain patient and overtake cyclists when they are able to, as currently. A less than 1% increase in total traffic is unlikely to materially worsen this situation.

Egress route via Ockham Road North to A3

135. The egress route from The Drift will involve vehicles turning left onto Ockham Road North and travelling along this route to the A3 at Wisley. Ockham Road North is a B classified road. The stretch north of The Drift is rural in nature with a number of bends. There are residential properties on the western side north of The Drift and south of Green Lane. There are then isolated properties with a cluster of them around Ockham. There have been 10 recorded personal injury accidents along this stretch. The causes of the accidents included losing control, failing to stop in time, failing to give way and speeding. Again there is no evidence to suggest that an increase in 33 daily HGVs would contribute to unsafe highway conditions.
136. The applicant has submitted a traffic count on Ockham Road North undertaken in 2014 but this was south of the junction with The Drift. This indicates that the weekday 18-hour average is 5,379 two-way vehicle movements of which 387 or 7% were larger goods vehicles. On the basis that the traffic volumes to the north of the junction with The Drift are of a similar order to those to the south of the junction, the additional 33 vehicles would

⁶⁵ Institute of Environmental Assessment , 'Guidelines for the Environmental Assessment of Road Traffic'

⁶⁶ Or an increase the proportion of HGVs of that order

⁶⁷ Which was parked at the time

result in a 9% increase in goods vehicles and an increase in total traffic of less than 1%. Again, projected changes in traffic of less than 10% will create no discernible environmental impact and anything less than a 30% change in traffic flow would not require an assessment of the environmental impact of traffic. In this case, the impacts on Ockham Road North would be below 30% indicating that any impacts would be slight.

Conclusion

137. Clearly there will be a transportation impact from this proposal. The impact will be greatest on The Drift but there is no doubt that there will be an impact on the other parts of the route. An additional 33 HGVs per day is, however, a modest number and there is no evidence to suggest that the additional vehicles will adversely affect highway safety. By limiting the delivery hours to avoid school drop off and pick up times at St Matthews School in Downside, with the knock on benefit for pedestrians accessing Effingham Junction Station and all road users during the morning peak hour, the applicant has recognised and addressed the main sensitive receptors. Any impact from the passage of HGVs will be of an amenity and/or environmental nature and will be transient and temporary. These aspects of the development are discussed below in the relevant section of this report. The impact on The Drift is more physical, although temporary in nature and can be suitably mitigated by measures to be secured by planning conditions and a legal agreement. SCC's Rights of Way Officer and Highways England have not raised objection to the development. Accordingly, Officers consider that the development proposed satisfies policy DC3 of the SWP, policy G1(2) of the GLP, Policy CS25 of the ECS, and policy DM7 of the EDM.

AIR QUALITY AND NOISE

Development Plan Policies

Surrey Waste Plan 2008

Policy DC3 – General Considerations

Guildford Local Plan 2003

Policy G1(3) – Protection of Amenities Enjoyed by Occupants of Buildings

Elmbridge Development Management Plan 2015

Policy DM5 - Pollution

Policy Context

138. Paragraph 109 of the Framework advocates contribution to and enhancement of the natural and local environment by preventing development from contributing to or being put at unacceptable risk from levels of air pollution. In these respects paragraph 122 advised that the CPA should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Paragraph 124 of the Framework discusses air quality specifically in relation to Air Quality Management Areas but it does confirm that the cumulative impacts on air quality from individual sites in local areas should be considered. In this respect the Framework's practice guidance states that it is important that the potential impact of new development on air quality is taken into account in planning where the national assessment indicates that relevant limits have been exceeded or are near the limit. Air quality can also affect biodiversity and odour and dust can adversely affect local amenity. Paragraph 123 of the Framework states that planning decisions should aim to: (a) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, and (b) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise.

139. Criteria G of the NPW's Annex B explains that in respect of air quality, considerations should include the proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled through the use of

appropriate and well-maintained and managed equipment and vehicles. Criteria J requires, in respect of noise, consideration to the proximity of sensitive receptors and noise and vibration from goods vehicle traffic movements to and from a site.

140. Policy DC3 of the SWP requires that applicants demonstrate that the development can be controlled such that it will not significantly adversely affect people, land, infrastructure and resources in terms of air quality and noise. Similarly, policy G1(3) of the GLP confirms that the amenities enjoyed by occupants of buildings from unneighbourly development in terms of noise, vibration, pollution, and dust should be protected.
141. Policy DM5 of the EDM states that all development that may result in noise pollution will be expected to incorporate appropriate attenuation measures to mitigate the effect on existing and future residents. Within designated Air Quality Management Areas development proposals should avoid introducing additional sources of air pollution. For proposals falling within an Air Quality Management Area and/or where the Council considers that air quality objectives are likely to be prejudiced, applicants will be expected to submit a detailed specialist report which sets out the impact that the proposed development would have upon air quality. Planning permission will not be granted for proposals where there is significant adverse impact upon the status of the Air Quality Management Area or where air quality may have a harmful. To minimise the impact of development and potential sources of pollution appropriate conditions will be imposed on planning permissions to secure mitigation measures.

The Development

142. The development would involve, over a period of 9 months, some 6,097 HGV trips⁶⁸ on a one way circular route. This would equate to about 33 HGV trips⁶⁹ per day on a route from the A3 through the villages of Cobham, Downside, Effingham and Ockham before reaching the A3 again. Although the development at large would take place from 0700 until 1630 hours Monday to Friday, HGVs would cease to access the site between 0800 and 0900 hours and by 1430 hours to avoid peak traffic and school drop off and pick up times. No working at all would take place over the weekends or holidays. The route for construction vehicles is within 100m of Air Quality Management Area (AQMA) and passes by two dwellings on The Drift. Footpath No. 559 crosses The Drift road to form footpath No. 561 whilst footpath No. 562, which runs from The Highlands road, ends at The Drift road. The closest houses to the application site are located beyond the eastern extent of the golf course beyond a series of tree belts and west of Forest Road at about 300m, to the southwest (The Highlands) of the golf course beyond The Drift and the Forest SNCI at about 350m, to the north (Blackmoor Farm) at some 480m, north east (Barnsthorns) at about 480m, and the south west (Blue Ryde Lodge and North Forest Lodge) beyond 350m along The Drift. Land raising activities are to be facilitated by a mini-digger, a bulldozer, and a 360° excavator. Wind direction at the site prevails from the south west towards the north east.

Air Quality

143. The applicant's Construction Dust Assessment dated June 2016 has been undertaken in line with guidance on the assessment of dust from construction produced by the Institute of Air Quality Management (IAQM)⁷⁰. This report concludes that in the absence of suitable mitigation the development would have a low risk of causing impacts at adjacent residential receptors and high risk for golf users. However, on employing best practice dust management techniques during construction works the potential for residual effects of dust would be sufficiently reduced to negligible levels for residential receptors and temporarily slight adverse to golf course users. The applicant has set out proposed dust

⁶⁸ Some 12,194 HGV movements

⁶⁹ Some 66 HGV movements

⁷⁰ ['Guidance on the assessment of dust from demolition and construction'](#)

mitigation measures as described in the IAQM guidance as 'highly recommended' and 'desirable' for high risk impacts⁷¹. Accordingly, it is submitted that overall the development would not give rise to a significant effect on air quality by way of dust. The County Council's Air Quality Consultant (AQC) has assessed the proposal alongside the applicant's assessment and concurs that the development is unlikely to give rise to any significant adverse effects in terms of dust subject to planning condition securing a Dust Management Plan prior to commencement of the development.

144. The AQC has scoped out the need for the applicant to undertake an assessment of construction vehicle emissions relating to the proposal as the number of vehicle movements to be generated would be well below the threshold criterion for triggering such an assessment as advised by Environmental Protection UK (EPUK) and the IAQM⁷². The threshold criterion is 100 HGV movements per day for sites outside an AQMA as is the case for the application site. The proposal would involve a maximum of 66 HGV movements per day and therefore the impact on air quality by way of vehicle emissions is unlikely to be significant. However, the route for construction vehicles is within 100m of the Cobham High Street AQMA which has been so designated due to high levels of nitrogen dioxide emissions. The criterion threshold for triggering an assessment of vehicle emissions within or adjacent to an AQMA is more than 25 HGV movements per day. Accordingly, the AQC has considered the proposal in terms of the Cobham High Street AQMA along with the information provided by the applicant⁷³. The Cobham High Street AQMA is separated from the HGV route by other local roads, buildings and a car park. 'Cobham 6' is the nearest nitrogen dioxide monitoring point to the HGV route and Downside Bridge Road. It is located at the junction of the High Street and Anyards Road/Hogshill Lane. The concentration of nitrogen dioxide at this location has been consistently below the UK objective since at least 2010. As a major route, traffic flows along the High Street are likely to be higher than those along Downside Bridge Road and therefore roadside concentrations of nitrogen dioxide are likely to be proportionally lower on Downside Bridge Road than concentrations at Cobham 6 and the High Street. Accordingly, considering the increase in 33 HGV trips associated with the development the AQM considers that the impact of resultant vehicle emissions on the Cobham High Street AQMA is not likely to be significant.

Noise

145. The noise impacts of the development have been assessed in the applicant's Noise Statement dated June 2016 having regard to the Framework's Technical Guidance⁷⁴ and SCC's 1994 'Guidelines for Noise Control: Minerals and Waste Disposal'. Noise arising from ground remodelling activities has been predicted in accordance with BS 5228-1:2009 'Code of Practice for noise and vibration control on construction and open sites'. This standard has been subsequently superseded by BS 5228-1:2009+A1:2014 post the applicant's assessment. However, SCC's Noise Consultant (SNC) does not consider the differences between the current standard and the previous version of the standard would materially affect the methodology of findings of the assessment.
146. Measurements of similar activities to those required during the ground remodelling have been used to predict the noise level. This is considered to be a good approach. The measured noise source levels used in the prediction have been validated against those provided in BS 5228-1:2009+A1:2014. It was found that the source levels used in the prediction are very similar to those provided in the BS, suggesting that the input data used in the prediction is appropriate and representative of the activities proposed. The baseline

⁷¹ See Section 8.2 Dust and Air Emissions Mitigation Measures of the IAQM's publication '[Guidance on the assessment of dust from demolition and construction](#)'

⁷² [Table 6.2, 'Land-use Planning and Development Control: Planning for Air Quality', May 2015](#)

⁷³ Letter dated 14 October 2015 from Ramboll Environ Ref. LUK1821258

⁷⁴ Noise Standards for Long Term Activities (paragraph 30) and Short Tem Activities (paragraph 31)

noise level⁷⁵ was determined through a baseline survey lasting five hours in duration at the nearest sensitive receptors⁷⁶. It is considered that the length and timing of the survey is appropriate considering that the duration of any potential construction effects will be limited by the extent of the construction programme which is to be 9 months. Comparing the predicted noise level due to ground remodelling activities against the Framework's Technical Guidance and SCC's noise guidelines a marginal exceedance of 1dB is forecast against the latter. A subjective assessment of predicted noise level due to remodelling activities in terms of noise change indicates a worst case of a 'slight impact'. The existing noise environment local to the nearest noise sensitive receptors is characterised by transport noise and is therefore unlikely to be adversely affected by noise arising from the temporary construction phase owing the similar nature of ground remodelling and transport noise. Accordingly, the SNC considers that it is highly unlikely that noise due to the ground remodelling activities proposed would give rise to any adverse effects. The main noise source from the development would be the HGVs on public roads. Normally an increase in noise of less than 1 dBA is considered not particularly significant. Noise change due to increased HGV usage of The Drift has been considered by the applicant and the SNC. These assessments indicated that the prediction of noise change is no greater than that predicted for ground remodelling works i.e. a marginal exceedance of 1dB is forecast. Of the roads to be used by HGVs associated with the development The Drift is the least used and therefore its baseline noise level is likely to be lower than the other roads which make up the route. Consequently, the noise change on other parts of the route is also unlikely to be particularly significant.

147. Some objectors have raised concerns about the effects of vibration resulting from HGVs associated with the development. This is an issue that needs to be considered in context of the data discussed in the 'Highways, Traffic and Access' section of this report. All the roads on the proposed HGV route are presently used by HGVs. The proposal would result in a marginal increase in overall traffic on the route and then only for a limited duration of between 9 and 12 months. For these reasons Officers do not consider that the development would have any significant impact as a result of vibration caused by HGV movements.

148. Notwithstanding the above, so as to ensure that the amenity of local residents is not adversely affected by way of noise, dust, vehicle emission and vibration, planning conditions should be imposed on any permission granted so as to limit the development to 33 HGV trips per day Monday to Friday from 0700 hours to 0800 hours and 0900 hours to 1430 hours with no working over weekends or holidays.

Conclusion

149. Having regard to paragraphs 142 to 148 above Officers consider that the development satisfies policy DC3 of the SWP, policy G1(3) of the GLP and policy DM5 of the EDM.

FLOOD RISK

Development Plan Policies

Surrey Waste Plan 2008

Policy DC3 – General Considerations

Policy DC2 – Planning Designations

Guildford Borough Local Plan 2003

Policy G1(6) – Flood Protection

Policy G1(7) – Land Drainage

Policy Context

⁷⁵ Against which the predicted construction noise level was assessed

⁷⁶ West of Forest Road at about 300m

150. Paragraph 100 of the Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Paragraph 103 explains that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere. Paragraph 109 of the Framework advocates that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Consequently, paragraph 120 of the Framework states that in order to prevent unacceptable risks from pollution, planning decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account.
151. In respect of the protection of water quality and resources and flood risk management the NPW's Appendix B Criteria A requires consideration of the proximity of vulnerable surface and groundwater or aquifers and the suitability of locations subject to flooding, with consequent issues relating to the management of potential risk posed to water quality from waste contamination.
152. Policy DC2 of the SWP states that planning permission will not be granted for waste related development where this would endanger, or have a significant adverse impact, on the setting of land liable to flood. Policy DC3 of the SWP is clear that planning permissions for waste related development will be granted provided it can be demonstrated that the development will not significantly adversely affect people, land, infrastructure and resources in terms flooding, groundwater conditions and the hydrogeology of the locality.
153. Policy G1(6) of the GLP explains that areas of floodplain should be safeguarded from development that would increase the risk to people or property from flooding. Policy G1(7) states that adequate land drainage should be put in place to meet the needs of the development.

The Development

154. The development includes the re-profiling of the driving range outfield, building of an irrigation pond and the installation of a water harvesting scheme. There will also be a new driving range structure with a short game area beside this and the existing car park. The site is entirely within Flood Zone 1. The nearest named watercourse is the Ockham Mill Stream, around 5km to the west of the site. There appears to be no significant flood risk, as defined by the Strategic Flood Risk Assessment, for the area⁷⁷. The main issues relating to flood risk are the irrigation lagoon, the new structure and possible increases in runoff resulting from landscaping of the site. The applicant's Flood Risk Assessment indicates that⁷⁸ increases in runoff are only likely to occur on locally steepened slopes. With imported soil and well managed vegetation, surface runoff may well decrease compared to the existing situation. Furthermore, the remodelling proposed will generally be in areas that are remote from the site boundary. The only exception to this is the northern boundary where waste would be placed within 20m of the boundary. This provides a reasonable buffer for any possible impacts.
155. The irrigation lake has been designed such that much of the storage is below existing ground level. The top width of the embankment around the lake would be a minimum of 1m to reduce the risk of a breach. In the unlikely event of a breach, it is only the volume of water above ground level that needs to be considered. The impact of any breach has

⁷⁷ As shown in Table 4 of the applicant's Flood Risk Assessment for New Structures and Drainage Improvements dated June 2016

⁷⁸ Given that the site is currently developed on impermeable soils

been examined and it is concluded that over a distance of 450m the breach would amount to an average water depth of between 0.17m and 0.46m. The closest dwelling is some 570m from the proposed lake and above the 50m AOD contour which is above the design water level of the lake and therefore not at risk of flooding from any breach. The new driving range bays will lead to a local increase in runoff. It is proposed this is routed to the adjacent pond where any increases can be mitigated. It has been demonstrated for a range of storm durations that this can be achieved by remodelling of the outlet including a reducing the width of the outlet weir to 0.24m. Overall the residual risk of the development in terms of flooding is low. The development is unlikely to cause an increase of flooding at or downstream of the site. However, a maintenance programme should be put in place for the proposed drainage areas and the outlets from the attenuation ponds. This could be suitably addressed by way of planning conditions. The impacts of climate change have been included in all runoff calculations by increasing rainfalls by 20% in the line with national guidance.

156. SCC's SuDS and Consenting Team Leader has reviewed the surface water drainage strategy for the proposed development and assessed it against the requirements under the Framework and its accompanying technical guidance. Officers have been advised that Lead Flood Authority is satisfied that the proposed drainage scheme meets the requirements set out in the Framework and its accompanying technical guidance and therefore does not raise objection subject planning conditions to ensure that the rainwater harvesting scheme is properly implemented and maintained throughout the lifetime of the development.

Conclusion

157. Taking into account paragraphs 154 to 156 above Officers consider that the development satisfies policies DC2 and DC3 of the SWP and policies G1(6) and G1(7) of the GLP.

LANDSCAPE AND VISUAL IMPACT

Development Plan Policies

Surrey Waste Plan 2008

Policy DC2 – Planning Designations

Policy DC3 – General Considerations

Guildford Borough Local Plan 2003

Policy G1(9) – Energy Conservation

Policy G1(12) – Safeguarding and Enhancement of the Landscape

Policy G5(1) – Context for Design

Policy G5(2) – Scale, Proportion and Form

Policy G5(3) – Space Around Buildings

Policy G5(5) – Layout

Policy G5(6) – Important Public Views and Roofscape

Policy G5(7) – Materials and Architectural Detailing

Policy G5(8) – Traffic, Parking and Design

Policy G5(9) – Landscape Design

Policy Context

158. Paragraph 56 of the Framework is clear that the Government attaches great importance to the design of the built environment. It explains that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. To this end paragraphs 63 and 64 state that great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area, and permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. Paragraph 109 of the

Framework requires that the planning system contribute to and enhance the natural and local environment by protecting and enhancing landscapes.

159. In respect of the protection of the landscape and visual amenity the NPW Appendix B Criteria C requires consideration of (i) the potential for design-led solutions to produce acceptable development which respects landscape character; and (ii) the need to protect landscapes or designated areas of national importance including Areas of Outstanding Natural Beauty.
160. Policy DC2 of the SWP states that planning permission will not be granted for waste related development where this would endanger, or have significant adverse impact, on the character, quality, interest or setting of the AONB, AGLV or ancient woodlands. Similarly, policy DC3 of the same seeks the protection of landscapes and woodland and the provision of mitigation measures where appropriate.
161. Policy G1(9) of the GLP requires developments to be designed so that it is energy efficient. Policy G1(12) explains that development should be designed to safeguard and enhance the characteristic landscape of the locality and existing natural features on the site, such as hedgerows, trees, watercourses and ponds which are worthy of protection. Guildford Borough Council's Design Code relevant to the development comprises policies G5 (1 to 3 and 5 to 9) of the GLP. These policies require development to respect established street patterns, plot sizes, building lines, topography, established views, landmark buildings, roof treatment, aspect and relationship with other buildings; the scale, height and proportions and materials of the surrounding environment; and existing spaces of value. They also require development to create new spaces of attractive and identifiable character that can be easily understood by the user; and safeguard important public views through the use of materials which are of a high standard and which harmonise with surrounding buildings and reinforce the identity and character of an area. They also seek to minimise the visual impact of traffic and associated access and parking and require a high standard of landscape design including trees and planting to ensure that new development integrates into the existing landscape.

The Development

162. The site is situated within the Ockham and Clandon Wooded Rolling Claylands landscape character area the key characteristics of which are its subtle rolling topography criss-crossed by small streams and drainage channels and dotted ponds. Coupled with its underlying heavy London Clay soil this is an area that may be subject to land-drainage problems and summer soil cracking as part of its natural character. Accordingly, this landscape is susceptible to seasonal weather variations and variously in flood or running dry. The golf course lies on the urban fringe of East and West Horsley although there is a sense of a more rural character created by the extensive woodlands both within and around its boundaries. The existing golf course is semi-artificial in character⁷⁹ set within a landscape that is fairly typical of the Lowland Thames Basin.
163. Whilst there is some distinction between the practice range outfield and the rest of the golf course as a consequence of it being more open in nature and comprising limited golf related features (greens, tees, bunkers, mounds etc.), it generally typifies the golf landscape of open amenity grass running throughout woodland. There is a stronger distinction between the practice range area and the farmland landscape to the north and the area to the south which contains the car park, club house and access road. From within the application site area most users will only perceive the landscape from the southern end where the teeing area is located and from where shots are played to the range outfield. The practice range outfield is enclosed to the east and west by woodland belts and to the north by a mature hedgerow interspersed with a high proportion of mature

⁷⁹ Highlighted by buildings, car park, undulating fairways, mounded tees, practice range outfield, formal paths etc.

hedgerow trees. To the south the landscape is more open, mainly as a consequence of the course requirements for a car park, clubhouse and access road, although beyond this the site is again enclosed by a further bank of woodland i.e. The Forest SNCI. The general sense is of being within a woodland landscape albeit with defined and relatively wide vistas created by the golf course. There is also a sense that to the north of the site, the landscape becomes more pastoral in nature with occasional glimpses through the hedge line and trees to the arable fields that rise to the ridgeline. The sense of woodland landscape is diminished somewhat to the south of the site by the presence of the large car park and club house, although the backdrop of woodland on the southern boundary of the site continues to emphasise the woodland character of the immediate landscape. The generally low lying nature of the application site and the presence of ditches and streams flanking the area are very much a characteristic feature of the landscape. Seasonally the character of the outfield changes due to its geology and high water table.

164. The development is intended to deliver significant improvements to the existing practice facilities as well as a more sustainable supply of water and energy for the golf club. Montages 1 to 7 of the applicant's Landscape and Visual Impact Assessment dated June 2016 illustrate the intended appearance of the proposed practice range outfield, irrigation land and building. The five principal elements of the proposal – the earthworks, the new practice bay structure, the short game area, the water storage lake and the associated landscaping could all have an impact both visually and in terms of alternation to the landscape and its character.
165. The development is likely to be visible from two points off site. From a section of The Drift that passes the existing golf course access⁸⁰ and from Footpath No. 25 that runs to the north of the application site, at about 250m, but only when intervening trees and hedgerows are absent their foliage. The works would also be visible to those using the golf course and from the clubhouse. There are no long views of the site from any direction as a consequence of the surrounding topography and the extensive woodland coverage in the area around the site.
166. A 15m buffer zone will be put in place between the edge of ancient woodland and the practice ground outfield in accordance with advice from the Woodland Trust⁸¹ and Natural England's standing advice⁸². This buffer zone would exclude any construction work or vehicles and be demarcated by way of temporary tree protection fencing. The development would result in the loss of 2 trees outside of any ancient woodland one of which is dead and the other in poor condition⁸³.

Scale

167. The practice bay building measures 769m² and its dimension are 92m long with a width of generally 5m, extending to between 9m and 16m in places. Its height varies from 3.9m at the northern elevation to 3.2m at the southern elevation⁸⁴. The proposed building includes solar panels. The roof-space available would allow 200 1m x 1.7m panels to be installed giving potentially 50kW of power. This power will in turn be used for the electrical requirements of the new proposed building, the existing maintenance building and for the operation of the irrigation system. The adjacent short games area covers about 1,000m² (0.1ha). The practice range outfield covers 27,600m² (2.76ha) with an average increase in levels of 1.98m. The proposed storage lake covers approximately 3,000m² (0.3ha) with a maximum depth of 5m. Banking around the lake would be 2m in height.

⁸⁰ The degree of view would be variable depending upon the season

⁸¹ See Drawing Ref. 551.09 Rev B – Contractors Work Plan dated 6 June 2016

⁸² [Ancient woodland and veteran trees: protecting them from development, Natural England and Forestry Commission, October 2015](#)

⁸³ Tree No.40, dead Common Oak; and tree No. 72 Common Oak with buttress wound, black staining on trunk and significant deadwood within crown – See applicant's Tree Survey dated June 2016, Appendix 2 and 3

⁸⁴ See Drawing Ref. 551.07 Rev C – Range Building Elevations dated 6 June 2016

168. The building will be a steel frame, clad with shiplap timber stained brown. The roof will be Plastisol coated steel, coloured grey. The adjacent short game area will be a mixture of artificial grass and natural grass areas shaped into subtle mounds and depressions. There will be one sand bunker to the eastern side. The range outfield has been designed to be stimulating and act as a catchment area for the water harvesting scheme. The outfield itself will be a series of low level mounds and swales with slopes of between 3% and 5%. The water storage lake is designed to hold water both above and below the existing ground level. This would require peripheral bunding around the east, west and northern sides with the end of the practice ground outfield forming the southern banking. The outer banking will be 1 in 3 slopes and landscaped with wildflower grassland and tree planting. The practice range outfield and storage lake would be landscaped using native grass, tree and shrub species.

Construction

169. The development would result in various activities including the presence of a contractors' compound, site offices, cranes, scaffolding, soil storage mounds, HGVs and plant, bare earth, exposed lake liner, stockpiles of building and drainage material, and the temporary passing bays along The Drift.

Mitigation

170. The structure of the covered practice bays and ancillary rooms will be single storey and clad in timber to resemble the local vernacular for wooden farm buildings/barns. No artificial lighting is proposed as part of the development. An extensive planting scheme has been designed by the applicant to strengthen the screening provided by existing vegetation, reinforce the buffer zone between the practice range outfield and ancient woodland, while also providing an overall net gain to biodiversity. The development would provide for 21,000m² of species-rich semi improved acid grassland; 3,975m² of wildflower/rough grassland; 2,697m² of woodland planting; some 3,000m² of additional open standing water⁸⁵; 63m² of wetland habitat⁸⁶; and 163m² of pond planting.

Effect on Landscape Character and Visual Amenity

171. Having regard to the above Officers consider that the significance of effect on landscape character during the construction period of 9 months would be minor mainly as a consequence of topsoil stripping and the movement of HGVs and plant. HGVs would have the most impact in this respect as The Drift road would temporarily experience a change in character specifically its tranquillity. Following completion of the development the character of the landscape would not have materially changed. The character of the local landscape would remain semi artificial in the context of a golf course. The 15m-buffer zone and tree protection fencing proposed by the applicant would ensure no impact on woodland surrounding the site. Mitigation measures would, in time, result in a slight beneficial impact on local landscape character. Visual impact during construction will essentially be confined to short sections of Footpath No. 25 to the north of the site during the winter and from the existing access to the golf club along The Drift. This would result in a minor adverse impact over a limited period for the duration of the works. Visual impact following completion of the development would also be limited to Footpath No. 25 to the north of the site during the winter and from the existing access to the golf club along The Drift. This impact will diminish with the establishment of the proposed mitigation planting to the south of the proposed building. Long-term establishment of the proposed planting around the area of the existing access to the golf course would screen much of the built

⁸⁵ Including a new pond to the north of the proposed storage water lake

⁸⁶ To the north of the proposed water storage lake

elements of the proposal (and existing buildings and car park) resulting in a moderate beneficial impact on visual amenity.

172. As discussed in the 'Sustainable Waste Management' section of this report, Officers consider the approach adopted by the applicant in seeking to remedy the drainage characteristics of the range outfield to be reasonable and proportionate in the circumstances. Officers are also satisfied that the proposed lake has been well considered and designed and is proportional to the applicant's ambitions of becoming self-sufficient in irrigation water supply. The golf course is currently absent a practice putting, chipping green and a practice bunker which are common features on golf courses in Surrey. The applicant asserts that the state of the art new short game academy would complement the improved practice range outfield and provide teaching staff with further structure to their teaching programmes as part of a centre of teaching excellence. Similarly, it is submitted that the proposed covered practice bays and associated rooms would complement the proposals for the practice ground outfield and short game academy in that it would provide a first rate environment in which to conduct individual tuition, group clinics, society lessons, school and holiday tuition etc. Officers consider that these are reasonable aspirations for an existing golf course facility.

Conclusion

173. Guildford Borough Council has objected to the appropriateness of the proposed building in respect of the Green Belt and some objectors have raised concerns about its size and visual and landscape impact. Having considered the applicant's Landscape and Visual Impact Assessment SCC's Landscape Architect has concluded that the building is not out of character with the nature of the land use as a golf course and has therefore not raised objection to this aspect of the development. Officers consider that installation of the proposed solar panels can be secured by way of condition. The impact of the building on the Green Belt is discussed below in the relevant section of this report. Similarly, SCC's Landscape Architect has assessed the proposed land raising activities and concluded that although they would affect the character of the local landscape in a particular section of the golf course so that it appears more formal, the contours proposed are sympathetic with the surrounding landscape form such that they maintain and respect the underlying landscape character. In this regard no objection has been raised by the landscape architect subject to a 10-year Landscape and Ecology Management Plan⁸⁷. Such a management plan would seek to secure the long-term management of the landscape components of the proposed development in order to maximise ongoing landscape amenity and biodiversity. Existing landscape features will be protected and reinforced wherever possible and new landscape features introduced in order to strengthen the existing landscape setting and assimilate the development into that setting. These components will be enhanced and protected for visual amenity and nature conservation with the objective of ensuring the long-term care of an attractive, sustainable environment. Officers agree with the landscape architect's assessment and therefore having regard to paragraphs 162 to 172 above, it is considered that the proposal satisfies policy DC3 of the SWP and policies G1(12) and G1(9), R8, and G5 (1 to 3 and 5 to 9) of the GLP.

ECOLOGY

Development Plan Policy

Surrey Waste Plan 2008

Policy DC2 – Planning Designations

Policy DC3 – General Considerations

Guildford Borough Local Plan 2003

Policy G1(12) – Safeguarding and Enhancement of Existing Natural Features

Policy NE3 – Local and Non-statutory Sites

⁸⁷ The applicant's 25-year Landscape Management Plan does not address ecology and therefore a management plan addressing both landscape and ecology is considered necessary

Policy NE4 – Species Protection

Policy NE5 – Development Affecting Trees, Hedgerows and Woodland

Policy NE6 – Undesignated Features of Nature Conservation Interest

Policy Context

174. The law⁸⁸ places a duty on Surrey County Council to consider biodiversity in the full range of their activities including determining planning applications. In this context paragraphs 109 and 118 of the Framework explain that the planning system should contribute to and enhance the natural and local environment, and in determining planning applications the CPA should aim to conserve and enhance biodiversity by applying the following principles: (a) If significant harm resulting from a development cannot be avoided⁸⁹, adequately mitigated, or as a last resort compensated for, then planning permission should be refused; (b) proposed development on land within or outside a SSSI likely to have an adverse effect on a SSSI⁹⁰ should not normally be permitted; (c) opportunities to incorporate biodiversity in and around developments should be encouraged; and (d) planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.
175. In respect of nature conservation the NPW Appendix B Criteria D requires consideration of any adverse effect on a site of international importance for nature conservation, a site with a nationally recognised designation, Nature Improvement Areas and ecological networks and protected species.
176. Policy DC2 of the SWP makes clear that planning permission will not be granted for development where this would endanger or have a significant adverse impact on the character, quality, interest or setting of Ancient Semi-natural Woodlands or SNCIs. Policy DC3 of the SWP states that planning permission for waste related development will be granted provided it can be demonstrated that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect flora and fauna and their respective habitats at the site or on adjoining land including linear or other features which facilitate dispersal of species.
177. Policy G1(12) of the GLP requires developments to be designed to safeguard and enhance existing natural features on the site, such as hedgerows, trees, watercourses and ponds which are worthy of protection. Accordingly, policy NE3 of the GLP sets out that planning permission will not be granted for proposals which are likely to directly or indirectly materially harm nature conservation interests including local or non-statutory sites unless clear justification is provided that the reasons for the development outweigh the value of the site in its local or regional context. Similarly, policy NE4 is clear that permission will not be granted for any development that would cause any demonstrable harm to a species of animal or plant or its habitat protected by law unless conditions are attached requiring the developer to take steps to secure their protection. In respect of trees, hedges and woodland policy NE5 of the GLP states that development will not be permitted if it would damage or destroy trees protected by a Tree Preservation Order or in a conservation area. This policy goes on to explain that if the removal of any trees is permitted as part of a development, a condition may require that an equivalent number, or more, of new locally native trees be planted either on or near the site. Policy NE6 seeks to preserve and enhance the features of ecological value on development sites.

The Development

⁸⁸ Section 40 of the [Natural Environment and Rural Communities Act 2006](#)

⁸⁹ Through locating on an alternative site with less harmful impacts

⁹⁰ Either individually or in combination with other developments

178. The site is not covered by any national or higher-level nature conservation designations. However, the Ockham & Wisley Commons SSSI and Thames Basin Heaths SPA are located some 2.3km to the northwest and the Bookham Commons SSSI is about 2.5km to the east. The site is within the Forest SNCI and there are three further SNCIs located within some 2km. The Forest SNCI extends beyond the golf course and The Drift to the south and west. This nature reserve carries regional importance for its populations of amphibians including Great Crested Newts. Given the large population of amphibians within the Forest SNCI there is a registered toad tunnel⁹¹ under The Drift which allows amphibians to migrate from the woodland south of The Drift to the existing ponds within the golf course for breeding. The maximum loading on this tunnel is unclear. The golf club includes extensive areas of ancient woodland some of which adjoins the practice range outfield and The Drift where the temporary passing bays are proposed to be located.

179. The development would require 6,097 HGVs to traverse The Drift over a period of 9 months. To facilitate the passing of HGVs and other traffic along this road temporary passing bays⁹² are proposed at key intervals which generally match the locations of existing informal passing bays. Additionally, to facilitate HGVs turning into The Drift from Forest Road an over run strip⁹³ on a small section of grass verge where The Drift meets Forest Road would be required. The passing bays and over run strip are to be reinstated on completion of the development to the satisfaction of the County Highway Authority. The scheme also includes the remodelling of the existing practice range outfield and the construction of a 3,000m² water storage lake, a building comprising 30 covered practice bays and associated rooms, and a new short game academy. The development would result in the loss of some 28,000m² of amenity grassland⁹⁴; about 1,800m² of ruderal⁹⁵ vegetation⁹⁶; and 2 trees outside of any ancient woodland one of which is dead and the other in poor condition⁹⁷. Conversely, the development would provide for 21,000m² of species-rich semi improved acid grassland; 3,975m² of wildflower/rough grassland; 2,697m² of woodland planting; some 3,000m² of additional open standing water⁹⁸; 63m² of wetland habitat⁹⁹; and 163m² of pond planting.

Evaluation

180. The applicant has undertaken a number of supporting surveys and assessments to ascertain the likely impact of the development on fauna and flora within and outside of the application site. In 2012 an Ecological Walkover Assessment and Protected Species Survey was undertaken. These exercises were supplemented by records of the Surrey Biological Records Centre and discussions with the Surrey Amphibian Reptile Group (SARG). In 2013 the aforementioned assessments and surveys were extended and updated to reflect concerns raised by Officers in respect of ancient woodland adjoining the existing practice range outfield and the proximity of a known GCN breeding pond to the south of The Drift. Following further concerns raised by Officers on behalf of interested parties¹⁰⁰ the assessments and surveys were repeated in 2015 and a walkover survey was undertaken to note any changes in the overall ecology of the area. In 2016 a further assessment was undertaken in relation to the proposed passing bays and ancient woodland and further consideration was given to the practice range outfield, badgers and

⁹¹ Built in association with exclusion fencing

⁹² See Appendix B of Addendum to Planning Application Ref. G19172 dated May 2015 (Appendix E to Environmental Statement dated June 2016)

⁹³ See Drawing Ref. 551.91 – Survey of The Drift Over Run Strip dated 8 March 2015

⁹⁴ Where ground remodelling is to take place and where the water storage lake is to be constructed

⁹⁵ A plant species that is first to colonise disturbed lands

⁹⁶ Where the passing bays are to be created along The Drift, where ground remodelling is to take place, and where the water storage lake is to be constructed

⁹⁷ Tree No.40, dead Common Oak; and tree No. 72 Common Oak with buttress wound, black staining on trunk and significant deadwood within crown – See applicant's Tree Survey dated June 2016, Appendix 2 and 3

⁹⁸ Including a new pond to the north of the proposed storage water lake

⁹⁹ To the north of the proposed water storage lake

¹⁰⁰ Including the Woodland Trust, Surrey Wildlife Trust and SARG

GCNs. These surveys, assessments and considerations are discussed in detail in the applicant's Ecological Impact Assessment dated May 2016.

Results of Evaluation

181. The existing practice range outfield comprises amenity grassland which is mown frequently and grazed by rabbits. Although one of the predominant habitats within the site is semi-natural broadleaved woodland classed as ancient woodland its ground flora is species-poor and dominated by mown grasses. The vegetation on the northern boundary of the site where the lake is to be constructed comprises a range of common and opportunistic species such as bramble, bracken, nettle, creeping thistle, and spear thistle. This area is separated from the adjoining agricultural land to the north by an old field margin/hedge which comprises young ash, goat willow and mature hawthorn. Only ruderal opportunistic flora would be lost as a result of the proposed temporary passing bays on The Drift and no tree works would be required in respect of the same. No signs of GCNs or their eggs were discovered in any ponds within 250m of the site. In this respect the results of surveys conducted in 2012, 2013 and 2015 are consistent in their findings. Common toads and frogs have been noted in several ponds on the golf course and a smooth newt egg was noted in a single pond in 2015. Badger setts were discovered within 500m west of the site although a night-time survey indicates that no badgers forage or pass through the site or its immediate surroundings. A common shrew was the only small mammal to be trapped as part of the surveys. Foxes, rabbits, grey squirrels, and moles were noted during the surveys. A total of 7 species of butterfly and 21 species of bird were noted during transect walks. Trees immediately adjacent to the site are not considered suitable for bats as they are semi-mature with few cracks and holes. The 2 trees to be removed as part of the development are not suitable as bat roosts either. No signs of bat habitation were found in relation to existing buildings. Woodland and scrub within and adjoining the site have the potential to support a range of breeding birds. However, the woodland is rather sparse and open and therefore not ideal for nesting birds. The practice range outfield is frequently mown and has no habitat to support ground nesting birds.

Avoidance, Mitigation, Compensation and Enhancement Measures

182. The applicant has proposed a range of measures to avoid and minimise the potential for the development to adversely impact amphibians including GCN¹⁰¹. These measures include the erection of temporary exclusion fencing around the application site prior to commencement of the development¹⁰², surveying the site prior to works commencing to ensure no amphibians have migrated onto the site, and exclusion fence monitoring during the course of the development. Similarly, a 15m buffer zone will be put in place between the edge of ancient woodland and the practice ground outfield in accordance with advice from the Woodland Trust¹⁰³ and Natural England's standing advice¹⁰⁴. This buffer zone would exclude any construction work or vehicles and be demarcated by way of temporary Heras fencing in accordance with BS 5837:2012¹⁰⁵. In order to retain the soil profile of the proposed temporary passing bays a method of surface protection would be put in place to prevent erosion and reduce compaction while allowing moisture to penetrate into the soil profile. This protection¹⁰⁶ would comprise a combination of geotextile membranes, cellular mesh, aggregate and concrete/tarmac interfaces to bridge the step between the highway and the cellular mesh. In respect of Badgers the site and surrounding area would be checked for recent signs of badger activity prior to the development commencing. During

¹⁰¹ See Section 4 of Great Crested Newts (and other amphibians) Reasonable Avoidance Measures dated 10 June 2015

¹⁰² See Appendix 1 of Great Crested Newts (and other amphibians) Reasonable Avoidance Measures dated 10 June 2015

¹⁰³ See Drawing Ref. 551.09 Rev B – Contractors Work Plan dated 6 June 2016

¹⁰⁴ [Ancient woodland and veteran trees: protecting them from development, Natural England and Forestry Commission, October 2015](#)

¹⁰⁵ [Trees in relation to design, demolition and construction - Recommendations](#)

¹⁰⁶ See Section 1.3 and Figure 1 of Safeguarding The Ancient Woodland Verge Along The Drift Road dated 1 June 2016

the course of the development badgers would be temporarily excluded from the site area by way of the proposed fencing.

183. So as to compensate for the proposed temporary passing bays and enhance the ecological value of the application and wider golf course the applicant has proposed a range of measures¹⁰⁷. A total of 2,355m² of woodland planting in 4 separate blocks would be undertaken adjacent to the site i.e. in and amongst existing woodland. A further 342m² of woodland planting would be undertaken so as to provide a visual screen for the existing and proposed buildings¹⁰⁸. The proposed woodland planting would create additional foraging and nesting opportunities for birds and would encourage invertebrates and generate refugia for amphibians and reptiles. As woodland planting develops it would link up with similar existing habitat thereby encouraging population movement through increased cover and foraging opportunities. Small mammals are also likely to use this new habitat. Parts of the site area would be set-aside and left to floral succession thereby creating areas of natural scrub and some 3,975m² of wildflowers/rough grassland would be created between the existing woodland edge and the practice range outfield. Such habitat would create foraging areas for a variety of birds and bat species and would encourage invertebrates and generate refugia for amphibians, reptiles and small mammals. The proposed wildflowers/rough grassland areas would also provide connectivity between the proposed woodland blocks and their associated ground flora through increased cover and foraging for population migration. An area of wetland measuring about 63m² would be established north of the proposed water storage lake adjacent to a new pond¹⁰⁹ which would provide for some 163m² of pond planting. The pond and wetland area has been designed to attract amphibians, reptiles, bats and birds including wild fowl by way of additional refugia and foraging areas. The 3,000m² of additional open standing water on site would also encourage invertebrate populations thereby providing further foraging opportunities for reptiles, amphibians, birds, bats and small mammals and cover for reptiles and amphibians. Additionally, the applicant has committed to erecting bird and bat boxes in suitable locations, the creation of log pile refugia/hibernacula for invertebrates, reptiles and amphibians, and the 'planting' of semi-buried wood for invertebrates.

Conclusion

184. In October 2014 the Woodland Trust advised that the areas of buffering proposed at that time was not sufficient to be able to protect the adjacent ancient woodland during the construction period. Accordingly, the trust recommended that the applicant increase the buffer zone to the minimum proposed by Natural England as set out in their Standing Advice. The applicant has extended the proposed buffer zone to 15m which is the minimum required by Natural England's standing advice. This buffer zone would exclude any construction work or vehicles and be demarcated by way of appropriate temporary fencing. Officers are satisfied that this 15m standoff between ancient woodland and the development areas is sufficient to negate any adverse impact on ancient woodland.
185. The SARG also objected to the development as proposed in 2014 on the basis that the scheme, especially creation of passing bays, could impact GCNs and toads and their habitat as well as the Forest SNCI. The SARG requested that further consideration be given to the applicant's ecological impact assessment and the health and safety implications of the toad crossing. Since 2014 the applicant has repeated the ecological surveys in relation to the development. In this respect the results of surveys conducted in 2012, 2013 and 2015 are consistent in their findings. No signs of GCNs or their eggs were discovered in any ponds within 250m of the site, although common toads and frogs have been noted in several ponds on the golf course and a smooth newt egg was noted in a single pond in 2015. Officers are satisfied that these surveys have been conducted

¹⁰⁷ See Section 5.4 of Ecological Impact Assessment dated 6 May 2016; Figure 4 of Safeguarding The Ancient Woodland Verge Along The Drift Road dated 1 June 2016; and Drawings Ref. 551.03a Rev D – Landscape Plan dated 6 June 2016 and Ref. 551.03b Rev B – Landscape Plan dated 6 June 2016

¹⁰⁸ At the existing entrance to the golf club

¹⁰⁹ Designed specifically for amphibian breeding

properly and that their collective findings are robust. SARG has not raised any further concern about the applicant's surveys since raising their initial concerns in 2014. In respect of the proposed passing bays the applicant has demonstrated that these are generally in locations already used as passing places by existing traffic along The Drift and only ruderal opportunistic flora would be lost as a result of the same. No tree works would be required to facilitate the proposed passing bays. Consequently, having regard to the measures proposed to protect the soil structure of the areas identified for the proposed passing bays¹¹⁰, Officers are satisfied¹¹¹ that the development would not adversely affect ancient woodland adjacent to The Drift or the Forest SNCI. As with the culvert at the western end of The Drift, should planning permission be granted for the development the applicant would be required to confirm that the toad tunnel is able to accommodate the weight of un-laden HGVs prior to the commencement of any operations. Moreover, the applicant has agreed to undertake before and after surveys of The Drift (including the culvert and toad tunnel) and to fund works to make good any damage caused by the development. This commitment can be secured by the s278 agreement should consent be granted. In respect of the safety of wildlife volunteers along The Drift a series of temporary and appropriate warning signs would be erected along The Drift¹¹² to warn drivers of vehicles and footpath/bridleway users of construction works, HGV traffic, and that those footpath/bridleway users have priority. The County Highway Authority and SCC's Rights of Way Officer have not objected to the development on health and safety grounds subject to these and other measures.

186. In October 2015 the Surrey Wildlife Trust advised that should SCC be minded to grant permission the applicant should be required to undertake all the recommended actions in the application to help prevent adverse effect to badgers, bats and wild birds resulting from development works including the biodiversity enhancements proposed. Officers are satisfied that the measures proposed by the applicant in these respects can be secured by way of condition should planning permission be granted for the development. Moreover, the trust advised in 2015 that the development would considerably increase the risk of Great Crested Newts being adversely affected by works and that the proposed passing places could impact ancient woodland habitat. For the reasons discussed in relation to the concerns raised by the SARG in 2014 Officers consider that the development would not adversely impact GCNs and amphibians and the Forest SNCI. The trust also raised concern about the additional traffic disturbance, including noise, fumes and accidental chemical deposition which could have adverse effects on sensitive habitats such as ancient woodland and the species they support. The proposed passing bays are to be created in areas already used by some 2,000 vehicles including HGVs on a weekly basis. Accordingly, there is an existing risk that vehicular noise, fumes and accidental chemical deposition could adversely affect ancient woodland and the Forest SNCI. Although the scheme would result in additional HGV movements along The Drift this increase would be minimal and then only for a limited period. Accordingly, Officers do not consider that the development would materially increase the risk of accidental chemical deposition. Moreover, the existing noise environment of The Drift is characterised by transport noise and therefore Officers consider that an additional 33 HGVs per working day between the hours of 0700 and 0800 and 0900 and 1430 only is unlikely to adversely affect ancient woodland or the Forest SNCI by noise owing the similar nature of the noise and its limited duration. For the same reasons Officers do not consider that the temporary increase in HGV emissions over the same periods would adversely affect ancient woodland or the Forest SNCI. As with the SARG, Surrey Wildlife Trust has not raised any further concern about the development since 2015.

187. Natural England have confirmed that the proposal is unlikely to affect any nature conservation sites and has therefore not raised objection to the development although they

¹¹⁰ See Section 1.3 and Figure 1 of Safeguarding The Ancient Woodland Verge Along The Drift Road dated 1 June 2016

¹¹¹ Subject to appropriate reinstatement to the satisfaction of the County Highway Authority and the proposed avoidance, mitigation, compensatory and enhancement measures including woodland planting

¹¹² See Drawing Ref. 551.88a – Location of Warning Signs dated 8 March 2015

have advised that SCC should ensure it has sufficient information to fully understand the impact of the proposal on the same before it determines the application. To this end SCC's Ecologist has assessed the proposal in terms of its impact on ecological assets including ancient woodland, GCNs and amphibians, and the Forest SNCI. The Ecologist has not raised objection to the development subject to a range of conditions. Officers consider that subject to the avoidance, mitigation, compensation and enhancement measures proposed by the applicant the scheme would not result in any significant adverse impact on ecological assets, including protected species and ancient woodland, relevant to the application site and surrounding land. To the contrary Officers consider that the development would result in a net gain to biodiversity over the long-term. Accordingly, Officers are satisfied that the development complies with policies DC2 and DC3 of the SWP, and policies G1(12), NE3, NE4, NE5, and NE6 of the GLP.

HERITAGE ASSETS

Development Plan Policies

Surrey Waste Plan 2008

Policy DC2 – Planning Designations

Policy DC3 – General Considerations

Guildford Borough Local Plan 2003

Policy HE4 – New Development

Elmbridge Development Management Plan 2015

Policy DM12 – Heritage

Planning (Listed Buildings and Conservation Areas) Act 1990

188. Notwithstanding the policy requirements and guidance relating to heritage assets discussed in the following paragraphs, s66 and s72 of the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#) are material to the determination of the subject planning application. In respect of listed buildings s66 requires that SCC, in considering whether to grant planning permission for development which affects a listed building or its setting, have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. In respect of Conservation Areas s72 requires that SCC, with respect to any buildings or other land in a conservation area, pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

Policy Context

189. The Framework explains at paragraph 126 that heritage assets¹¹³ are an irreplaceable resource that should be conserved in a manner appropriate to their significance. Paragraph 132 of the Framework states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Paragraph 133 of the Framework is clear that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, the SCC should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Whilst paragraph 134 outlines that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

¹¹³ Including archaeological resources

190. Historic England has published a series of guidance notes¹¹⁴ to assist in the determination of planning applications that could have an impact on heritage assets. Advice Note 3, at paragraph 4, recognises that the extent of a setting cannot have a fixed boundary and may alter over time due to changes in circumstance. Whereas paragraph 5 explains that views can contribute to setting of heritage assets e.g. viewing points or where a view is a fundamental aspect of the design of the asset or where assets were meant to be seen by one another for aesthetic, functional, ceremonial or religious reasons. Advice Note 2, at paragraph 4, explains that the first step in assessing the impact a development proposal may have on a designated heritage is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic and artistic interest.
191. Criteria E of Appendix B of the NPW states that in testing the suitability of sites the CPA should consider the potential effects on the significance of heritage assets, whether designated or not, including any contribution made by their setting.
192. Policy DC2 of the SWP advocates that planning permission will not be granted for development where this would endanger, or have a significant adverse impact, on the character, quality, interest or setting of listed buildings, Conservation Areas or sites of archaeological importance. Moreover, policy DC3 of the SWP explains that planning permissions for development will be granted provided it can be demonstrated that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect heritage assets or result in the loss of or damage to archaeological resources.
193. Policy HE4 of the GLP states that planning permission will not be granted for development that adversely affects the setting of a listed building by virtue of design, proximity or impact on significant views. Similarly, policy DM12 of the EDM is clear that planning permission will be granted for developments that protect, conserve and enhance the Borough's historic environment including listed buildings and Conservation Areas.

The Development

194. The site is not covered by any national level archaeological or historical heritage designations. There are no points listed on the Surrey Historic Environment Record (HER) located within or within close proximity to the site. A Scheduled Ancient Monument (SAM) 'Medieval moated site and fishpond' (English Heritage List ID 1013011) is located some 1.3km to the southeast. The closest Registered Park & Garden to the site is the Grade II Listed Hatchlands (English Heritage List ID 1001697) which is located some 3km southwest. There are three Grade II Listed Buildings located at the western end of The Drift - 'Blue Ride Cottage' (English Heritage List ID 1029408), 'North Forest Lodge' (English Heritage List ID 1029407), and 'Blue Ryde Cottage' (English Heritage List ID 1029403). These dwellings are over 500m from the entrance to the golf course. The Ockham Conservation Area is located some 1.7km to the northwest of site. The proposed route for construction vehicles¹¹⁵ passes through three Conservation Areas and by a number of Listed Buildings as set out in paragraph 13 above.
195. The development comprises an engineering operation and the construction of a building. The engineering operation would involve the remodelling of the existing practice ground outfield, construction of an accompanying water storage lake, and creation of a new short game academy. The building would amount to 30 covered practice bays and associated rooms totalling 769m² of internal floor space with a maximum height of the building under

¹¹⁴ ['Good Practice Advice in Planning: 2 Managing Significance in Decision-Taking in the Historic Environment', July 2015](#) and ['Good Practice Advice in Planning: 3 The Setting of Heritage Assets', July 2015](#)

¹¹⁵ See paragraph 23 above

4m. The development also includes the installation of temporary two-way traffic lights at the pinch point located where Blue Ride Cottage and North Forest Lodge face each other at the western end of The Drift¹¹⁶. These temporary lights would be operational during the proposed hours of work¹¹⁷ so as to minimise traffic conflict in the vicinity of the dwellings. A series of temporary passing bays¹¹⁸ and appropriate warning signs would also be erected along The Drift¹¹⁹. The wider landholding of the golf club includes extensive areas of woodland some of which adjoins the site and The Drift. Accordingly, the golf course, club house and car park are well-contained and screened by surrounding woodland. The applicant's Landscape and Visual Impact Assessment demonstrates that the development is likely to be visible from two points off site. From a section of The Drift that passes the existing golf course access¹²⁰ and from Footpath No. 25 that runs to the north of the application site, at about 250m, but only when intervening trees and hedgerows are absent their foliage. The works would also be visible to those using the golf course and from the clubhouse. There are no long views of the site from any direction as a consequence of the surrounding topography and the extensive woodland coverage in the area around the site.

Listed Buildings and Conservation Areas

196. The development proposed has been assessed by SCC Historic Buildings Officer who has raised no objection to the development subject to conditions. Having considered the applicant's Heritage Assessment dated June 2016, the temporary nature of the development, and the location of the site within an existing golf course enclosed by woodland, it is not considered that the development would result in any lasting change to the setting of the two closest listed buildings to the site (Blue Ride Cottage and North Forest Lodge). This view is subject to any temporary highway measures along The Drift being removed on completion of the development or within 12 months after the development has commenced whichever is the sooner, and the placement of rubber matting at the temporary traffic lights to minimise vibration from HGVs. In respect of the engineering aspects of the development the Historic Buildings Officer considers that these works would be at sufficient distance from the two listed buildings such that their respective settings would not be affected by the development. This is consistent with the views of Officers in respect of the traffic, highways and access; noise and air quality; flooding; and landscape and visual impact aspects of the development as discussed in the preceding sections of this report. The Historic Buildings Officers has added that he considers that the heritage conservation guidance provided by the Framework have been satisfied by the development.
197. Elmbridge Borough Council and other interested parties have raised concern about the impact of increased HGV movements on roads through Cobham and Downside in the context of Cobham Conservation Area, Cobham Plough Corner Conservation Area, Downside Village Conservation Area and listed buildings within these areas. This is an issue that needs to be considered in context of the traffic data discussed in the Highways, Traffic and Access section of this report. All the roads on the proposed HGV route are presently used by HGVs. The proposal would result in a marginal increase in overall traffic on the route and then only for a limited duration of 9 months Monday to Friday 0700 to 0800 hours and 0900 to 1430 hours. For these reasons Officers do not consider that the development would materially affect the setting of heritage assets along the proposed HGV haulage route.
198. Although Officers do not consider that the development would result in any lasting change to the setting of the two closest listed buildings to the site or materially affect the setting of

¹¹⁶ See Appendix B of Addendum to Planning Application Ref. G19172 dated May 2015 (Appendix E to Environmental Statement dated June 2016)

¹¹⁷ Monday to Friday between 0700 and 0800 hours and 0900 and 1430 hours

¹¹⁸ See Appendix B of Addendum to Planning Application Ref. G19172 dated May 2015

¹¹⁹ See Drawing Ref. 551.88a – Location of Warning Signs dated 8 March 2015

¹²⁰ The degree of view would be variable depending upon the season

heritage assets along the proposed HGV haulage route, paragraph 134 of the Framework is clear that where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. In this context Officers consider that the development would provide some 87,805 tonnes of additional sustainable waste management capacity in the County; allow the golf club to permanently sever its reliance on mains water supply; secure the future of an existing local business and provide for additional full-time employment opportunities; and result in a net gain to biodiversity in the local area over the long-term. These aspects of the development would be tangible and have wider environmental and economic benefits which would in turn benefit the wider public. Contrasting these benefits against the limited and temporary impact the development would have on heritage assets on The Drift and the wider HGV haulage route by way of increased HGV traffic and the highway mitigation measures Officers conclude that the benefits clearly outweigh the less than substantial harm.

Archaeology

199. The applicant's Heritage Assessment dated June 2016 concludes that there is a medium to low potential for prehistoric activity on the site but acknowledges that due to the relative lack of any previous archaeological investigations in the area the possibility that significant remains from any period maybe present on the site cannot be discounted. In order to identify any archaeological deposits and to enable appropriate mitigation measures to be devised the applicant's Environmental Statement dated June 2016 identifies that a programme of evaluation, watching brief and post excavation assessment would be required and that a written scheme of investigation would be submitted to the CPA setting out an appropriate scheme of works prior to commencement of the development. On this basis the SCC's Archaeological Officer has not objected to the development subject to securing these measures by planning condition.

Conclusion

200. Having regard to paragraphs 194 to 199 above Officers consider that the development complies with policies DC2 and DC3 of the SWP, policy HE4 of the GLP, and policy DM12 of the EDM.

METROPOLITAN GREEN BELT

Development Plan Policy

Surrey Waste Plan 2008

Policy CW6 – Green Belt

Guildford Borough Local Plan 2003

Policy RE2 – Development within the Green Belt

Policy R8 – Golf Courses

Policy Context

201. Paragraph 79 of the Framework explains that the fundamental aim of Green Belt policy is to keep land permanently open, whilst paragraph 80 lists the five purposes of Green Belts: (a) to check unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling or derelict and other urban land. Accordingly, at paragraph 88, the Framework advocates that SCC should ensure that substantial weight is given to any harm to the Green Belt and that very special circumstances will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Paragraphs 89 and 90 of the Framework discuss what types of developments are 'appropriate' in Green Belt locations. Waste-

related development is not included in paragraphs 89 and 90 and therefore, as with previous Green Belt Policy¹²¹, waste related development is 'inappropriate development' in the Green Belt. The construction of new buildings in the Green Belt are also 'inappropriate' unless they are appropriate facilities for outdoor sport and outdoor recreation and they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Similarly, engineering operations are not 'inappropriate' provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within the same.

202. Policy CW6 of the Surrey Waste Plan 2008 states that there is a presumption against inappropriate waste related development in the Green Belt except in very special circumstances. Very special circumstances to justify inappropriate development in the Green Belt will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. The policy outlines that the following considerations may contribute to very special circumstances: (a) the lack of suitable non-Green Belt sites; (b) the need to find locations well related to the source of waste arisings; (c) the characteristics of the site; and (d) the wider environmental and economic benefits of sustainable waste management including the need for a range of sites.
203. Policy RE2 of the GLP states that new building will be deemed inappropriate unless it is for the following purposes: (a) agriculture and forestry; (b) essential facilities for outdoor sport and outdoor recreation, cemeteries and other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land within it; and (c) limited extension, alteration or replacement of existing dwellings. It goes on to explain that the aforementioned will not be permitted where it involves the loss of important open spaces, harms the character or appearance of the area or where necessary services are inadequate.
204. Policy R8 of the GLP explains that planning permission for the development of golf facilities will be permitted subject to the following criteria: (a) there is no loss of agricultural land; (b) there is no adverse impact on landscape character, nature conservation interest, archaeological interest, water environments, historic landscapes conservation areas or buildings of historic or archaeological interest; (c) built development is restricted to those activities which are genuinely ancillary to the golf use. Development unrelated to golf including indoor recreation and overnight accommodation will not be permitted; (d) existing public rights of way are safeguarded and enhanced where appropriate; and (e) adequate car parking is to be provided discretely and located or screened so as not to have an adverse impact on the character and appearance of the countryside.

The Development

205. The development comprises an engineering operation and the construction of a building in the Green Belt on a site measuring about 3.45ha within a larger landholding totalling some 56 hectares¹²². The larger landholding comprises an 18-hole course set within mature woodland. Presently there is a large clubhouse and maintenance building, a large hard-surface car park, a raised concrete teeing area with 18 artificial mats, 7 grassed teeing areas, and a practice putting green with a surrounding picket fence. The golf course, club house and car park are well-contained and screened by surrounding woodland.
206. The engineering operation¹²³ would involve the remodelling of the existing practice ground outfield, construction of an accompanying water storage lake, and creation of a new short game academy, all with imported inert waste totalling some 54,878m³.

¹²¹ Planning Policy Guidance 2 – Green Belts

¹²² The application site area is about 6% of the total area of the golf club

¹²³ Facilitated by a mini-digger, a bulldozer, and a 360° excavator

207. In order to achieve the engineering part of the proposal the applicant would import the inert waste material to the site by road using HGVs over a period of 9 months. Consequently, the development is to involve about 12,194 HGV movements¹²⁴ in total. This equates to some 66 HGV movements per working day over the period. The short game area is to be situated south of the proposed building and would measure about 1,000m² (0.1ha). It would comprise a mixture of artificial grass and natural grass areas shaped into subtle mounds and depressions. The practice range outfield, which measures about 27,600m² (2.76ha), would be remodelled principally to act as a catchment area for a water harvesting scheme. Consequently, it would be engineered into a series of low level mounds and swales with slopes of between 3% and 5% resulting in average increase in level by about 1.98m. The range outfield would be landscaped using native grass, tree and shrub species. The water storage lake north of the practice range outfield, which measures about 3,000m² (0.3ha), has been designed to hold water both above and below the existing ground level. This would require peripheral bunding around the lake up to 2m in height with the end of the practice ground outfield forming its southern bank. The bunding would be 1 in 3 slopes and landscaped with wildflower grassland and tree planting. Officers are satisfied that the engineering part of the development cannot be achieved with the importation of less waste or in another way. In consideration of alternatives Officers acknowledge that the application site is an existing practice range and therefore it is not practical or reasonable to consider relocating the entire facility elsewhere. Within the golf course there are physical and ecological constraints which dictate the location and scale/dimensions of the proposal.

208. The building would comprise 30 covered practice bays and associated rooms totalling 769m² of internal floor space. It would measure about 92m long with a width of generally 5m extending to between 9m and 16m in places. The height of the building varies from 3.9m at its northern elevation to 3.2m in the south¹²⁵. The proposed building includes provision for 200 1m x 1.7m solar panels to be installed on its roof. The power generated by these would be used for the electrical requirements of the new building, the existing maintenance building and for the operation of the irrigation system.

209. It is also proposed to install temporary two-way traffic lights at the western end of The Drift and a series of temporary and appropriate warning signs would also be erected along this highway. These temporary measures are to facilitate HGV movements along The Drift. An over run strip would also be required for HGVs on a small section of grass verge on the southern corner where The Drift meets Forest Road. The temporary passing bays and over run strip would be reinstated following completion of the development to the satisfaction of the County Highway Authority.

210. A temporary compound is to be established north of the existing club house and within the existing car park to facilitate the proposed development. It would be used primarily for the holding of machinery when not in use and for the storage of materials required for the remodelling and construction works. It would accommodate a single 'portacabin' to provide office, dining, rest and washing facilities. A wheel wash would also be located within the compound together with temporary parking for site operatives. The compound would be removed upon completion of the works. The applicant anticipates 3 construction operatives working on the practice ground outfield and 6 operatives working on the building at any one time.

211. A 15m buffer zone is to be put in place between the edge of ancient woodland and the practice ground outfield which is to be demarcated by way of temporary Heras fencing. This fencing is to be reinforced with temporary GCN exclusion fencing around the application site. The water storage lake is to be secured with a 2m high galvanised chain link fence for safety purposes.

¹²⁴ Two movements equates to a single HGV entering the golf course site and the same HGV leaving the site

¹²⁵ See Drawing Ref. 551.07 Rev C – Range Building Elevations dated 6 June 2016

212. The development would provide for 21,000m² of species-rich semi improved acid grassland; 3,975m² of wildflower/rough grassland; 2,697m² of woodland planting; some 3,000m² of additional open standing water¹²⁶; and 63m² of wetland habitat¹²⁷; and 163m² of pond planting. The applicant anticipates that the development would result in the golf club employing two new full-time professional teaching staff. It is also projected that the development would result in a 9.35% and 11.42% increase in the use of the practice ground outfield during the summer and winter months respectively¹²⁸.

Effect on Openness

213. The applicant submits¹²⁹ that the engineering aspects of the development are not 'inappropriate' as per paragraph 90 of the Framework because they would be temporary and limited in duration. The applicant goes on to assert that the engineering operations would have no impact on urban sprawl, the merging of towns or the setting and character of historic towns. In these respects the applicant refers to an appeal decision¹³⁰ which concerned the engineering of 237,000m³ of inert material and where the Inspector concluded that the operation would not adversely affect openness of the Green Belt. In this case Officers take a different view. The development proposed would introduce structures, works and activities to land where they would adversely impact the openness of the Green Belt. Officers acknowledge that the development seeks to enhance an existing outdoor sport and leisure land use and that the development would be temporary and limited in nature. However, the features described in paragraphs 207 to 212 above would not preserve the openness of the Green Belt for the duration of the development. Accordingly, Officers consider the engineering aspect of the development to be 'inappropriate development' in the Green Belt. Given the location and nature of the application site and the site-specific proposal Officers accept that the built development would not result in urban sprawl, lead to the merging of neighbouring towns, encroach on the countryside, or undermine the setting and special character of historic towns. Moreover, for the same reasons Officers do not consider that the development would undermine urban regeneration.

214. Similarly, the applicant submits¹³¹ that the building proposed is not 'inappropriate development' in the Green Belt. The reasons advanced in this respect are paragraph 89 of the Framework and the same appeal decision where the Inspector considered the driving range element of the development to be an 'essential facility for outdoor sport and recreation'. The applicant contends that 'facilities' should encompass 'buildings'. Officers do not share this view. A 'driving range element' of a particular proposal is not necessarily concerned with 'buildings' as is the case here. Nevertheless, paragraph 89 of the Framework is unequivocal. New buildings in the Green Belt are 'inappropriate' unless they are: (a) appropriate facilities for outdoor sport and outdoor recreation; and (b) they preserve the openness of the Green Belt; and (c) do not conflict with the purposes of including land within it. This paragraph creates a *prima facie* rule namely that the construction of new buildings is inappropriate. It then goes on to state that there are certain 'exceptions to this'. All of these exceptions need to be met in order for the relevant building to be considered 'not inappropriate'. Although Officers accept that the proposed building would amount to an appropriate facility for outdoor sport and recreation¹³², Officers do not consider that the proposed building, including the covered practice bays, preserves the openness of the Green Belt due to its scale. However as with the engineering aspects of the proposal, considering the nature of the application site and the site-specific proposal Officers do not consider that the proposed building would result in urban sprawl, lead to the

¹²⁶ Including a new pond to the north of the proposed storage water lake

¹²⁷ To the north of the proposed water storage lake

¹²⁸ Figure 22a, Section 6.1.1 of Environmental Statement dated 6 June 2016

¹²⁹ See Section 15.3 of Design and Access Statement dated 6 June 2016

¹³⁰ Appeal Ref. APP/G5180/A/12/2174431

¹³¹ See Section 15.3 of Design and Access Statement dated 6 June 2016

¹³² See analysis in the 'Sustainable Waste Management' section of this report

merging of neighbouring towns, encroach into the countryside, undermine the setting and special character of historic towns, or undermine urban regeneration. Accordingly, Officers also consider that the proposed building is 'inappropriate development' in the Green Belt.

215. In respect of the engineering works and the degree of harm to openness, Officers consider that this would be limited to the duration of the engineering works which would last 9 months following which the openness of the Green Belt would be fully restored in the context of the existing land use. In respect of the building and the degree of harm to openness, Officers conclude that the building would result in moderate harm given the nature of the existing use and the location of the building within the golf course. Additionally, any enhancement of the existing golfing facilities leading to an increase in on-site activity following completion of the development should not give rise to any additional loss of openness. Accordingly, although the development proposed would undermine the fundamental aim of the Green Belt this would, in part, be temporary and otherwise moderate, and therefore Officers consider that the proposal as a whole would have a limited impact on the openness of the Green Belt.

216. Accordingly, there is a presumption against the grant of consent for the proposed development except in very special circumstances. Very special circumstances to justify the development in the Green Belt will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Other Harm

217. The potential for other harm has been assessed earlier in this report with regard to highways, traffic and access; air quality and noise; flood risk; landscape and visual impact; ecology; and heritage assets. Officers have concluded that the development would be beneficial in respect of the sustainable management of waste in the County and would result in a net gain to local biodiversity over the long-term. Otherwise the development would have no adverse effect in respect of flooding, air quality, noise and landscape and visual amenity. Whereas the temporary increase in traffic would give rise to less than substantial harm to listed buildings on The Drift¹³³ and limited adverse impact on the affected roads over the course of the development. Officers have concluded that any potential harm can be mitigated by the imposition of planning conditions and through a s278 legal agreement. The Borough Councils have raised concerns about the adverse impact the construction traffic may have in respect of the amenity of properties, the character and setting of heritage assets, and the safety of non-vehicle road users on the affected roads. Other interested parties have raised similar and other concerns in respect of highways, traffic and access; air quality and noise; flood risk; landscape and visual impact; ecology; and heritage assets. However, as discussed throughout this report the concerns expressed by the Borough Councils and other interested parties have not been borne out by the investigations and assessments undertaken by the applicant and the CPA's technical consultees including the County Highway Authority and Highways England; the Environment Agency and the Lead Flood Authority; Natural England; SCC's Landscape Architect, Listed Buildings Officer, Ecologist and Rights of Way Officer; and SCC's Noise and Air Quality Consultants.

Very Special Circumstances

218. Policy CW6 of the SWP outlines that the following considerations, taken individually or cumulatively, may contribute to very special circumstances: (a) the lack of suitable non-Green Belt sites; (b) the need to find locations well related to the source of waste arisings; (c) the characteristics of the site; and (d) the wider environmental and economic benefits of sustainable waste management including the need for a range of sites. It is not necessary to show that each and every factor in itself amounts to a very special circumstance, but

¹³³ Which Officers consider is outweighed by the benefits of the proposal as per paragraph 198 above

that the combination of circumstances, viewed objectively, is capable of being described as 'very special'. A number of ordinary factors may, when combined together, result in something very special. That is a matter for the planning judgement of the decision-taker.

219. As discussed in the 'Sustainable Waste Management' section of this report, Officers consider the proposal amounts to a temporary waste management facility concerned with the recovery of inert waste for the purposes of landraising by engineering operations. In this respect the proposal has been assessed against policies WD2, CW4 and CW5 of the SWP and found to be compliant.
220. It is acknowledged that the principal reasons for undertaking the development are for the purposes of remedying the drainage problems associated with the driving range outfield; establishing a sustainable rainwater harvesting storage and irrigation scheme; creating a centre of teaching excellence; and enhancing the ascetics and qualitative condition of the golf course's facilities. In these respects Officers have reasonably concluded that the development would result in the substantial improvement in the quality of the application site, that there are no satisfactory alternatives to achieving these improvements, and that the minimum volume of waste requisite would be involved, all in accordance with policy WD7 and WD8 of the SWP. Officers also consider, having regard to nature of the development and paragraph 204 above, that the development satisfies policy R8 of the GLP.
221. Further, Officers have explained that 2,038,000 tonnes of CDEW was managed in Surrey in 2014 of which 61% was landfilled, which in line with the WMP and NPW is considered to be the least preferable option for waste management. Although a high proportion of Surrey's waste is being managed through reuse, recycling and recovery, a lack of facilities for recycling and recovery within the County means that Surrey is still reliant on landfill capacity to be considered net self-sufficient. Consequently, there is a need to significantly improve the infrastructure provided within Surrey to manage waste without endangering human health or the environment and to enable communities to take responsibility for the waste produced¹³⁴. In this context the development proposed would provide for some 87,805 tonnes of additional sustainable waste management capacity amounting to about 4% of the total amount of inert waste imported into the County in 2014. This is a modest but significant contribution to the County's sustainable waste management capacity. The CPA has not received any objection to the proposal from mineral operators in Surrey and in 2013/2014 no mineral workings sought to extend the time-period for restoration as a result of a lack of inert waste material¹³⁵. Accordingly, Officers consider that the development would contribute to the sustainable management of waste materials in Surrey in a proximate location and in accordance with the SWP and NPW albeit for a temporary period and a limited volume of materials. Officers consider that the wider environmental and economic benefits of sustainable waste management should be afforded substantial weight in the context of very special circumstances.
222. Notwithstanding this, Officers consider that the proposal would result in a substantial improvement in the quality of the application site by way of remedying the drainage problems associated with the driving range outfield which cannot be achieved in another satisfactory way; providing for a sustainable rainwater harvesting, storage and irrigation scheme thereby cutting the golf course's reliance on mains water supply; providing a centre of teaching excellence to promote the game of golf to schools and the wider public in Surrey; securing the future of an existing local business and providing for additional full-time employment opportunities; and providing for a net gain to biodiversity in the local area over the long-term. Officers consider that these qualitative and operational benefits (which would also have wider environmental and economic benefits) in relation to an existing outdoor recreation use in the Green Belt, in the absence of viable and reasonable

¹³⁴ Paragraph B3 of the Surrey Waste Plan 2008

¹³⁵ See Appendix 1 of Surrey County Council Annual Monitoring Report 2014/2015

alternatives to securing these benefits, should be afforded significant weight in relation to very special circumstances.

223. Viewed objectively and taken together, Officers consider that the wider environmental and economic benefits the development would bring about as a result of sustainable waste management and the substantial improvement in the quality of the application do amount to 'very special circumstances' which clearly outweigh the harm arising out of inappropriateness, the moderate loss of openness as a result of the built development, the temporary increase in traffic giving rise to limited adverse impact on affected roads, and the less than substantial harm to listed buildings on The Drift.

Green Belt Conclusion

224. Officers consider that there is a clear need to provide sustainable waste management facilities in Surrey. The proposal would facilitate the sustainable management of waste in Surrey in a way that it achieves a substantial improvement in the quality of the application site. This substantial improvement would bring about qualitative and operational benefits at an existing outdoor sport and recreational facility and wider environmental and economic benefits. Officers attach significant weight to both these factors. Officers therefore conclude that the harm arising out of inappropriateness, the moderate loss of openness through the scale of the building, the temporary increase in traffic giving rise to limited adverse impact on affected roads and less than substantial harm to listed buildings on The Drift, is clearly outweighed by the factors referred to so as to amount to the very special circumstances necessary to justify the grant of planning permission subject to conditions and a s278 agreement. In this respect, Officers consider that the development satisfies policy CW6 of the SWP and policy RE2 of the GLP.

HUMAN RIGHTS IMPLICATIONS

225. The Human Rights Act Guidance for Interpretation, contained in the preamble to the Agenda, is expressly incorporated into this report and should be read in conjunction with the following paragraph.

226. Officers do not consider that the proposal engages any Convention rights.

CONCLUSION

227. The development comprises an engineering operation and the construction of a building in the Green Belt and in a rural area to the north of East Horsley village, southeast of Ockham, and west of Effingham. The engineering operation would involve the remodelling of the existing practice ground outfield, construction of an accompanying water storage lake, and creation of a new short game academy. The building would amount to 30 covered practice bays and associated rooms totalling 769m² of internal floor space with a maximum height of the building under 4m.

228. It is described by the applicant as "the importation, deposit and engineering of 54,878m³ (some 87,805 tonnes) of inert waste materials on 3.45ha of land within the existing golf course facility so as to remodel the existing practice ground outfield and to construct a new 11,000m³ irrigation storage lake as part of a strategy to provide sustainable rainwater harvesting scheme; create a new outdoor short game practice and teaching facility including a putting and chipping green; provide a new 769m² building with 30 covered practice bays and associated storage, ablution, lavatory, teaching and administrative facilities for the benefit of the general public, schools, the junior academy and club members; with associated ecological improvements over a period of 9 months and involving some 6,097 HGV trips or 12,194 HGV movements (based on a conversion rate of 13m³ (9m³ compacted) per 20 tonne HGV) on a one way circular route at a maximum of 33

HGV trips (66 HGV movements) per day, with temporary passing bays and traffic management measures along The Drift”.

229. The statutory development plan for consideration of the application comprises the Surrey Waste Plan 2008, the Elmbridge Core Strategy 2011, the Elmbridge Development Management Plan 2015, and the Guildford Local Plan 2003. In considering the development Officers have assessed its acceptability against the development plan policies and material considerations in respect of sustainable waste management; highways, traffic and access; air quality and noise; flood risk; landscape and visual impact; ecology; heritage assets; and the Metropolitan Green Belt aspects of the development.
230. The Borough Councils and other interested parties have raised concerns about the development in respect of all these aspects. However, as discussed throughout the report these concerns have not been borne out by the investigations and assessments undertaken by the applicant and the CPA's technical consultees including the County Highway Authority and Highways England; the Environment Agency and the Lead Flood Authority; Natural England; SCC's Landscape Architect, Listed Buildings Officer, Ecologist and Rights of Way Officer; and SCC's Noise and Air Quality Consultants. Officers have concluded that any potential harm can be mitigated by the imposition of planning conditions and through a s278 legal agreement and therefore assess the development to be in compliance with all relevant development plan policies applicable to sustainable waste management; highways, traffic and access; air quality and noise; flood risk; landscape and visual impact; ecology; and heritage assets.
231. Officers have concluded that the development is inappropriate development in the Green Belt and that there is a presumption against the grant of consent for the same except where very special circumstances are demonstrated. Officers consider that there is a clear need to provide sustainable waste management facilities in Surrey and that the proposal would facilitate the sustainable management of waste in Surrey in a way that it achieves a substantial improvement in the quality of the application site. Officers consider that this substantial improvement would bring about qualitative and operational benefits at an existing outdoor sport and recreational facility and wider environmental and economic benefits. Officers have therefore concluded that the harm arising out of inappropriateness, the moderate loss of openness by reason of the scale of the building, the temporary increase in traffic giving rise to limited adverse impact on affected roads and less than substantial harm to listed buildings on The Drift, is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify the grant of planning permission subject to conditions and a s278 agreement.

RECOMMENDATION

232. Officers recommend the **GRANT** of planning permission Ref. GU/14/P/01718 subject to prior completion of a s278 agreement and the following conditions:

Conditions:

Commencement

1. The development hereby permitted shall be begun no later than the expiration of three years beginning with the date of this permission. The applicant shall notify the County Planning Authority in writing within 7 days of commencing the development.

Approved Documents and Plans

2. The development hereby permitted shall be carried out in all respects strictly in accordance with the following plans/drawings/documents:

Letter dated 22 June 2016 from Weller Designs Ltd.
 Letter dated 14 October 2015 from Ramboll Environ
 Environmental Statement dated 6 June 2016
 Environmental Statement Non-Technical Summary dated 6 June 2016
 Background Ecological Data Search dated February 2013 (Appendix A)
 Ecological Impact Assessment dated 6 May 2016 (Appendix A)
 Heritage Assessment dated June 2016 (Appendix B)
 Landscape and Visual Impact Assessment dated 6 June 2015 (Appendix C)
 Noise Statement Ref. 813/2 Rev 2 dated June 2016 (Appendix D)
 Temporary Construction Access Scoping Report Ref. G19172 Rev. B dated 28 November 2012 (Appendix E)
 Addendum Report Ref. G19172/AR dated 13 March 2013 (Appendix E)
 Transport Assessment Scoping Note Ref. G19172/YB dated 27 February 2014 (Appendix E)
 Addendum Transport Assessment Scoping Note Ref. YB/G19172 dated April 2014 (Appendix E)
 Addendum Transport Assessment Scoping Note Ref. YB/G19172 dated April 2014 – Appendix K – 7 Day Traffic Count (Appendix E)
 Addendum to Planning Application Ref. G19172 dated May 2015 (Appendix E)
 Cobham Route Ref. G19172 dated June 2016 (Appendix E)
 Designers Response to Stage 1 Road Safety Audit Ref. G19172 dated June 2016 (Appendix E)
 Letter dated 15 June 2016 from Thomasons (Appendix E)
 Flood Risk Assessment for New Structure and Drainage Improvements Report Ref. K0341/1 Rev 3 dated June 2016 (Appendix F)
 Waste Statement dated June 2016 (Appendix G)
 Stakeholder Involvement Version 1 dated 20 June 2014 (Appendix H)
 Revised Tree Survey, Arboricultural Impact Assessment, Arboricultural Method Statement Ref. CC/1168 AR2627 dated 27 June 2016 (Appendix I)
 Design and Access Statement Version 4 dated 6 June 2016 (Appendix J)
 Long Term Landscape Management Plan Version 3 dated June 2016 (Appendix K)
 Dust Impact Assessment Ref. UK18-21258 dated June 2016 (Appendix L)
 Safeguarding the Ancient Woodland Verge along The Drift Road Version 3 dated 1 June 2016 (Appendix M)
 Drawing Ref. 551.01 Rev B – Existing Site Survey dated 2 February 2015
 Drawing Ref. 551.02 Rev C – Grading Plan dated 6 May 2016
 Drawing Ref. 551.03a Rev D – Landscape Plan dated 6 June 2016
 Drawing Ref. 551.03b Rev B – Landscape Plan dated 6 June 2016
 Drawing Ref. 551.04 Rev C – Cross Sections dated 6 June 2016
 Drawing Ref. 551.06 Rev C – Range Building dated 6 June 2016
 Drawing Ref. 551.07 Rev C – Range Building Elevations dated 6 June 2016
 Drawing Ref. 551.08 Rev C – Drainage and Water Harvesting Plan dated 6 June 2016
 Drawing Ref. 551.09 Rev B – Contractors Work Plan dated 6 June 2016
 Drawing Ref. 551.10 – Application Boundary Plan
 Drawing Ref. 551.15 – Cross Sections Showing Relative Adjustments to Profile following SCC Comments dated 29 April 2016
 Drawing Ref. 551.88 – Survey of The Drift Bay 3 dated 8 March 2015
 Drawing Ref. 551.88a – Location of Warning Signs dated 8 March 2015
 Drawing Ref. 551.87 – Survey of The Drift Bays 1 and 2 dated 8 March 2015
 Drawing Ref. 551.89 – Survey of The Drift Bay 4 dated 8 March 2015
 Drawing Ref. 551.90 – Survey of The Drift Bay 5 dated 8 March 2015
 Drawing Ref. 551.91 – Survey of The Drift Over Run Strip dated 8 March 2015
 Drawing Ref. TPP-CC/1168 AR2627 Rev 2 – Tree Protection Plan 1 of 2 dated 27 June 2015
 Drawing Ref. TPP-CC/1168 AR2627 Rev 2 – Tree Protection Plan 2 of 2 dated 27 June 2016

Duration

3. The development hereby permitted shall be completed in all respects within 9 months from the date of commencement notified to the County Planning Authority in accordance with condition 1 above.

Volume of Waste

4. No more than 54,878m³ of inert waste material shall be deposited on the site in order to facilitate the development. Accurate daily records of the volumes of inert waste deposited shall be maintained for the duration of the development and made available to the County Planning Authority within 7 days of such request.

Hours of Operation

5. No lights shall be illuminated nor shall any operations or activities authorised or required be carried out except between 0700 to 1630 hours Monday to Friday. No activities or operations shall be undertaken on Saturdays, Sundays or bank, public or national holidays. This condition shall not prevent working in emergencies to maintain safe site operations. Such emergencies shall be notified to the County Planning Authority in as soon as practicable.
6. Notwithstanding condition 5 above, importation of inert waste by HGVs shall cease between 0800 and 0900 hours and by 1430 hours Monday to Friday to avoid peak traffic.

Highways, Traffic and Access

7. The development shall not commence unless and until the applicant has undertaken to the satisfaction of the County Highway Authority: (a) temporary localised widening and temporary traffic management of The Drift (including the placement of rubber matting outside of the two dwellings on The Drift) to facilitate the passage of HGVs associated with the development as shown in Appendix E of Environmental Statement dated 6 June 2016; (b) surveys of the condition of the highway of The Drift prior to the commencement of the works; and (c) submission of the survey and an action plan/methodology of how to make good any damaged caused to the highway of The Drift by the passage of vehicles associated with the import of inert waste materials to the application site.
8. Prior to the commencement of the development an HGV routing strategy shall be submitted to and approved in writing by the County Planning Authority. This strategy shall include: (a) methodology for dealing with vehicles that are turned away from the site with full loads and vehicles which do not comply with the approved routing strategy; and (b) evidence from a suitably qualified professional that the culvert and toad tunnel on The Drift are capable of withstanding the weight of HGVs. The approved routing strategy and methodology shall then be implemented and maintained for the duration of the importation of inert waste materials to the site and issued to all delivery contractors using HGVs showing the approved access and egress routes to and from the site.
9. No operations involving the bulk movement of inert waste materials to the application site shall commence unless and until facilities have been provided in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority to prevent the creation of dangerous conditions for road users on the public highway. The approved scheme shall be implemented and maintained for the duration of bulk movement of inert waste materials to the application site.
10. There shall be no more than a total of 33 HGV loads per working day of inert waste imported to the site. For the duration of the development accurate records of the number

of HGVs accessing the site daily shall be kept and made available to the County Planning Authority within 7 days of such request.

11. Following the completion of importation of inert waste materials, the applicant shall: (a) remove the temporary traffic management measures on The Drift including passing places and the over-run strip and restore these areas to the satisfaction of the County Highway Authority; and (b) undertake surveys of the condition of the The Drift and arrange for the making good of any damaged caused in accordance with the approved action plan/methodology referred to in condition 7 above.

Great Crested Newts and Other Amphibians

12. The development shall be undertaken strictly in accordance with the Reasonable Avoidance Measures set out in paragraphs 4.1 to 5 in Appendix E of the Ecological Impact Assessment dated 6 May 2016 including: (a) pre-development erection of exclusion fence; (b) surveying of development site; (c) release of site for development; (d) exclusion fence monitoring; (e) scrub removal; and (f) timings.

Badgers

13. Prior to commencement of the development a badger checking survey shall be undertaken in respect of the application site to ensure that no setts have been created in the working areas. If setts have been created in the working areas the applicant shall inform the County Planning Authority and outline measures they propose to take prior to commencement of the development. These measures shall be carried out as agreed in writing.

Reasonable Avoidance Measures

14. The development shall be undertaken strictly in accordance with paragraphs 4.4.1 to 4.4.8 of in Appendix D of the Ecological Impact Assessment dated 6 May 2016 including: (a) pre-development erection of exclusion fencing; (b) surveying of site; (c) amphibian fence monitoring; (d) scrub removal; and (e) timings.

Woodland Management Plan

15. No development shall take place unless and until a Woodland Management Plan in accordance with Section 1.3 and 1.6 of Safeguarding the Ancient Woodland Verge along The Drift Road dated 1 June 2016 has been submitted to and approved in writing by the County Planning Authority. The Woodland Management Plan shall be implemented and carried out as approved.

Landscape and Ecological Management Plan

16. Prior to commencement of the development a 10-year Landscape and Ecology Management Plan (5-years early maintenance and 5-years aftercare) shall be submitted to the County Planning Authority for approval in writing. This plan should: (a) demonstrate how new planting is to move from newly planted to established habitat; and (b) provide for the management of new planting and habitat primarily for ecological benefits. The approved management plan shall be implemented and maintained as approved.

Foul Drainage

17. Construction of the building shall not commence until such time as a scheme to dispose of foul drainage has been submitted to and approved in writing by the County Planning Authority. This scheme shall be implemented and maintained as approved.

Dust

18. Prior to the commencement of the development a Dust Action Plan (DAP) shall be submitted to the County Planning Authority for approval in writing. The DAP shall specify trigger conditions and the measures for additional dust suppression to be applied at the site. The development shall be undertaken in accordance with the approved DAP. In the event that that the dust trigger levels are exceeded and cannot be controlled site operations shall either be modified or temporarily suspended in accordance with the provisions of the approved DAP.

Archaeology

19. Prior to commencement of the development the applicant shall secure the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted to and approved by the County Planning Authority in writing.

Surface Water Drainage

20. Prior to the commencement of the development details of the design of the surface water drainage scheme shall be submitted to and approved in writing by the County Planning Authority. Those details shall include: (a) a design that is compliant with the national Non-Statutory Technical Standards for SuDS, National Planning Policy Framework and Ministerial Statement on SuDS; (b) evidence that the proposed solution will effectively manage the 1 in 30 & 1 in 100 (+Climate change allowance) for storm events, during all stages of the development (Pre, Post and during) and follows the principles detailed in "The Drift Golf Club Flood Risk Assessment for New Structures and Drainage Improvements Report K0341/1 (Rev 3) June 2016"; (c) details of how the Sustainable Drainage System will cater for system failure or exceedance events, both on and offsite; (d) details of how the Sustainable Drainage System will be protected and maintained during the construction of the development; (e) finalised drawings for construction to include finalised drainage layout detailing the location of SUDS elements, pipe diameters and their respective levels and long and cross sections of each SuDS Element including details of flow restrictions; and (f) a management and maintenance plan that details long-term maintenance regimes and responsibilities. The surface water drainage scheme shall be implemented as approved.
21. Prior to the first occupation/use of the development, a verification report carried out by a qualified drainage engineer is to be submitted to and approved by the County Planning Authority in writing to demonstrate that the Sustainable Urban Drainage System has been constructed as per the approved scheme referred to in condition 21 above. The approved Sustainable Urban Drainage System shall be maintained for the duration of the development.

Rights of Way

22. There is to be no obstruction to any public rights of way at any time during the course of the development. This is to include vehicles, plant, scaffolding or the temporary storage of materials.

Reasons:

1. To comply with Section 91 (1)(a) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.
2. For the avoidance of doubt and in the interests of proper planning.

3. So as to comply with the terms of the application and in the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008, Policy CS25 of the Elmbridge Core Strategy 2011, Policies DM5 and DM7 of the Elmbridge Development Management Plan 2015, and policies G1(2) and G1(3) of the Guildford Local Plan 2003.
4. So as to comply with the terms of the application.
5. So as to comply with the terms of the application and in the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008, Policy CS25 of the Elmbridge Core Strategy 2011, Policies DM5 and DM7 of the Elmbridge Development Management Plan 2015, and policies G1(2) and G1(3) of the Guildford Local Plan 2003.
6. So as to comply with the terms of the application and in the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008, Policy CS25 of the Elmbridge Core Strategy 2011, Policies DM5 and DM7 of the Elmbridge Development Management Plan 2015, and policies G1(2) and G1(3) of the Guildford Local Plan 2003.
7. In order that the development does not prejudice highway safety nor cause inconvenience to other road users in accordance with Policy DC3 of the Surrey Waste Plan 2008, Policy CS25 of the Elmbridge Core Strategy 2011, Policies DM5 and DM7 of the Elmbridge Development Management Plan 2015, and policies G1(2) and G1(3) of the Guildford Local Plan 2003; and to ensure that the developer funds any highway repairs arising from the development in accordance with the terms of the application.
8. In order that the development does not prejudice highway safety nor cause inconvenience to other road users and to avoid conflict with the majority of schools traffic, pedestrians and cyclists in accordance with Policy DC3 of the Surrey Waste Plan 2008, Policy CS25 of the Elmbridge Core Strategy 2011, Policies DM5 and DM7 of the Elmbridge Development Management Plan 2015, and policies G1(2) and G1(3) of the Guildford Local Plan 2003.
9. In order that the development does not prejudice highway safety nor cause inconvenience to other road users in accordance with Policy DC3 of the Surrey Waste Plan 2008, Policy CS25 of the Elmbridge Core Strategy 2011, Policies DM5 and DM7 of the Elmbridge Development Management Plan 2015, and policies G1(2) and G1(3) of the Guildford Local Plan 2003.
10. In order that the development does not prejudice highway safety nor cause inconvenience to other road users in accordance with Policy DC3 of the Surrey Waste Plan 2008, Policy CS25 of the Elmbridge Core Strategy 2011, Policies DM5 and DM7 of the Elmbridge Development Management Plan 2015, and policies G1(2) and G1(3) of the Guildford Local Plan 2003.
11. In order that the development does not prejudice highway safety nor cause inconvenience to other road users in accordance with Policy DC3 of the Surrey Waste Plan 2008, Policy CS25 of the Elmbridge Core Strategy 2011, Policies DM5 and DM7 of the Elmbridge Development Management Plan 2015, and policies G1(2) and G1(3) of the Guildford Local Plan 2003; and to ensure that the developer funds any highway repairs arising from the development in accordance with the terms of the application.
12. So as to comply with the terms of the application and in the interests of local ecology in accordance with Policy DC3 of the Surrey Waste Plan 2008.
13. So as to comply with the terms of the application and in the interests of local ecology in accordance with Policy DC3 of the Surrey Waste Plan 2008.
14. So as to comply with the terms of the application and in the interests of local ecology in accordance with Policy DC3 of the Surrey Waste Plan 2008.

15. So as to comply with the terms of the application and in the interests of local ecology and ancient woodland in accordance with Policies DC2 and DC3 of the Surrey Waste Plan 2008.
16. In the interests of local ecology, landscape character and visual amenity in accordance with policies DC2 and DC3 of the Surrey Waste Plan 2008, and policies G1(12), NE3, NE4, NE5 and NE6 of the Guildford Local Plan 2003.
17. To protect surface water and groundwater quality. The Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. Without this condition the impact could cause deterioration of a quality element to a lower status class.
18. In the interests of local amenity and the environment in accordance with Policy DC3 of the Surrey Waste Plan 2008.
19. In the interests of archaeological resources in accordance with Policy DC3 of the Surrey Waste Plan 2008.
20. To ensure the design meets the technical stands for SuDS and the final drainage design does not increase flood risk on or off site in accordance with Policy DC3 of the Surrey Waste Plan 2008.
21. To ensure the Sustainable Drainage System is designed to the technical standards.
22. So as to comply with the terms of the application and in the interests of local rights of way users in accordance with Policy DC3 of the Surrey Waste Plan 2008.

Informatives:

1. This approval relates only to the provisions of the Town and Country Planning Act 1990 and must not be taken to imply or be construed as an approval under the Building Regulations 2000 or for the purposes of any other statutory provision whatsoever.
2. The County Planning Authority confirms that in assessing this planning application it has worked with the applicant in a positive and proactive way, in line with the requirements of paragraph 186-187 of the National Planning Policy Framework 2012. Examples of positive and proactive working include Officer advice and meetings with the applicant and the applicant's advisors since 2014 and consideration of several iterations of the development since 2014.
3. Any works to be carried out which will affect the flow or storage of water within, or which place or alter a structure/obstruction within an ordinary watercourse will require Ordinary Watercourse Consent. These can include permanent or temporary structures or works. An 'ordinary watercourse' is a watercourse that is not part of a main river and includes rivers, streams, ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows. Consent within Surrey is issued by the Sustainable Drainage and Consenting Team within Surrey County Council. The team can provide information on the requirements for consent and the application procedure and is contactable by email on SuDS@surreycc.gov.uk. Please note consent cannot be issued retrospectively. Works affecting designated Main River require consent from the Environment Agency.
4. From the date that any works commence in association with the development until the cessation of the development or completion of the operation to which it refers, a copy of this decision including all documents hereby approved and any documents subsequently

approved in accordance with this decision, shall be available to the site manager, and shall be made available to any person(s) given the responsibility for the management or control of the development or operations.

5. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (Section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or is being built. Planning consent for a development does not provide a defence against prosecution under this Act.
6. Trees and scrub are likely to contain nesting birds between 1 March and 31 August inclusive. Trees and scrub are present on the application site and are assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity during this period and shown it is absolutely certain that nesting birds are not present.
7. The Applicant's attention is drawn to the potential need to enter into discussions with the Environment Agency as to whether an Environmental Permit is required for the development proposal prior to the commencement of any works. Information on Environmental Permits can be obtained from the Environment Agency's website.

CONTACT

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BACKGROUND PAPERS

The deposited application documents and plans, including those amending or clarifying the proposal, responses to consultations and representations received as referred to in the report and included in the application file and the following:

Government Guidance

[National Planning Policy Framework 2012](#)

[Planning Practice Guidance](#)

[Waste Management Plan for England 2013](#)

[National Planning Policy for Waste 2014](#)

['Ancient woodland and veteran trees: protecting them from development'](#)

['Good Practice Advice in Planning: 2 Managing Significance in Decision-Taking in the Historic Environment'](#)

['Good Practice Advice in Planning: 3 The Setting of Heritage Assets'](#)

The Development Plan [insert details/delete if not relevant]

[Surrey Waste Plan 2008](#)

[Elmbridge Core Strategy 2011](#)

[Elmbridge Development Management Plan 2015](#)

[Guildford Local Plan 2003](#)

Other Documents

[The Waste \(England and Wales\) Regulations 2011](#)

[Surrey County Council Annual Monitoring Report 2014/2015](#)

['Guidance on the assessment of dust from demolition and construction'](#)

['Land-use Planning and Development Control: Planning for Air Quality'](#)

[Natural Environment and Rural Communities Act 2006](#)

[Trees in relation to design, demolition and construction - Recommendations](#)

[Planning \(Listed Buildings and Conservation Areas\) Act 1990](#)

[Guildford Borough Council's Landscape Character Assessment 2006](#)

['Guidelines for renovation and maintenance of football pitches'](#)

'Drought A Special Report'

Assessing optimum irrigation water use: additional agricultural and non-agricultural sectors,
Science

Report: SC040008/SR1
