

Planning & Access Statement

Proposed Irrigation Reservoir

Burhill Golf Club,
Burwood Road,
Hersham,
Walton-on-Thames
KT12 4BX

On behalf of Burhill Golf & Leisure Limited



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Land & Planning



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1. Introduction & Background

- 1.1 This planning, design and access statement has been prepared on behalf of Burhill Golf & Leisure Limited, a wholly owned subsidiary of Burhill Group Limited, owners and operators of Burhill Golf Club. It supports a full planning application for a proposed irrigation reservoir on land at Burhill Golf Club.
- 1.2 This statement collates a range of technical reports and plans which have been prepared to support the proposal and also draws upon the NPPF 2023, and the statutory development plan for Elmbridge Borough. It is also reflective of pre-submission advice provided by the planning authority (Pre-app No. 2020/2792).
- 1.3 This full application is now submitted consequent upon the grant of a licence to abstract water from the River Mole, such licence, LIT12247, issued by the Environment Agency under the provisions of the Environment Act 1995, the Water Resources Act 1991, (as amended by the Water Act 2003) and the Water Resources (Abstraction & Impounding) Regulations 2006. The licence is dated 29th June 2022.
- 1.4 Pre-application advice was sought of Elmbridge Borough Council in October 2020 and that advice was issued in letter form dated 23rd November 2020. The advice listed planning considerations to be addressed as:
 - The principle of development in the Green Belt and its impact on openness
 - The impact upon the character of the area
 - The impact upon the amenities of the neighbouring properties
 - The impact on Flood Risk
 - The impact on trees and biodiversity
 - The impact on Archaeology
- 1.5 This application, by this statement and together with the included reports, plans and appraisals, now seeks to address all of those issues.
- 1.6 This application comprises of the documents and plans listed at section 10 together with this statement and the usual completed application form and certificate of ownership.

2. Burhill Group Limited (BGL)

- 2.1 Operationally, Burhill Group Limited was founded in 1926 shortly after the first club within the grounds was opened in 1907. The club closed the second course, what is now identified as the New course, in 1939 in order to provide grazing for sheep and highland cattle during the war years. What is the Old course remained open.
- 2.2 In 1940 the buildings were requisitioned by government for the Ministry of Aircraft Production, headed by Barnes Wallis. During this period, the club was reduced from two and a half courses to one course.
- 2.3 In 1947 the property was restored to members and the former second course brought back into use as a golf course.
- 2.4 An additional course, the New Course (originally the South Course) was further developed and re-opened in May 2001. The club celebrated its centenary on the site in 2007.
- 2.5 BGL now operates 22 golf facilities across 10 different clubs, with facilities for all ages and capabilities.
- 2.6 In addition to golf course management BGL owns and manages a diverse property portfolio including two 1,000-acre mixed use estates at Burhill Park and Pyrford Estate and various other commercial and residential assets. This expertise has resulted in a strong reputation in the area of estates and land management.
- 2.7 The company has the resource, expertise and ability to deliver the proposal and to enhance its courses and facilities for the wider sport and recreational benefit of the locality.
- 2.8 Burhill Golf & Leisure is the operational golf business within BGL. It operates within and in accordance with all BGL corporate policies.
- 2.9 BGL operates under a comprehensive Environmental Policy covering areas including Water, Waste & Energy, Chemical Use & Storage, Ecology, Biodiversity and Social Responsibility, evidenced by being the first multi-golf course operator to achieve the International Sustainability Award and to be accredited by the GEO Foundation. The award recognises a wide-ranging variety of innovative community engagement, nature enhancement and protection and resource efficiency measures in place and being put in place across all courses.
- 2.10 BGL operates under a wide-ranging Nature Policy which provides for, inter alia, (i) identification of priority species and habitats through course-wide ecological surveys enabling good ecological status and management through to maximum ecological potential; (ii) revised mowing regimes to facilitate development of otherwise unmanaged ecology and grasslands; (iii) improvement of conservation management knowledge; (iv) management of rough grassland, woodland and ponds only outside of wildlife breeding seasons; (v) maximising the number of habitats across each course to ensure as far as practical that these are inter-connecting thus to avoid habitat fragmentation; (vi) treating biodiversity as a priority issue when considering all and any course improvements or developments.

- 2.11 BGL operates a corporate Water Policy which provides for, inter alia, (i) ongoing monitoring of water usage at each course and comparison of usage across courses under management; (ii) ensuring self-sufficiency of all course in terms of water demand and usage, and (iii) irrigation only to replace evapotranspiration to keep turf grasses alive and healthy.
- 2.12 BGL is committed to (i) enhancing its assets to the benefit of both golf and wildlife; (ii) conserving and obtaining energy from renewable resources, and (iii) fostering sustainable management practices for the development and maintenance of its golf courses.
- 2.13 Independent verification of the application of, and results arising from, the above policies can be obtained at <http://sustainable.golf/directory>
- 2.14 Burhill Golf Club is a highly regarded and prestige golf facility available to playing and social membership and presently there are 1500 members, both playing and social. The club in recent years has been invited to host regional qualifying rounds of the Open Championship and it has previously held events for the Euro Pro Tour for junior golfers. The club also hosts Surrey Junior golf events backed by Golf Tour professionals and numerous corporate business golf competitions.
- 2.15 The Burhill Golf Club has a long-standing mutual partnership with Reeds School at Cobham and for which it provides facilities for coaching, practice and matches. It has a similar arrangement with the Burhill Ladies Academy.
- 2.16 As well as golf, on the social side, the clubhouse affords a venue for weddings, corporate launches and a range of other events, both large and small.

3. The Rationale for the Proposal

- 3.1 Presently, the courses at Burhill Golf Club (BGC) are irrigated from stored water provided by abstraction via an existing bore hole. This arrangement draws water at a prescribed annual amount from the River Mole in accordance with the terms of an existing licence ref: TH/039/0032/001/R02. The quantity of water permitted to be extracted by that licence has proven insufficient to meet demands arising through summer months, with existing storage capacity being unable to hold volumes needed.
- 3.2 Water is permitted to be extracted all year but during winter months extracted water is not required for irrigation. The club therefore wishes to abstract more water during the whole year, using its daily winter allowance and to build additional storage capacity in a lined winter water storage lake. Thus, application has been made and licence granted to increase annual abstraction to 72,000 cu.m. with hourly/daily/monthly abstraction rates remaining as original.
- 3.3 As set out in the pre-submission made, dry weather over spring periods and advancement in seasons leaves courses, particularly greens, fairways and tees, vulnerable to early and excessive drying out. In consequence, irrigation often needs to be commenced earlier in each year which, in turn, leads to shortages later in the year.
- 3.4 Abstraction and course irrigation has, of recent years, been a regular subject of discussion in detail with the Environment Agency. Licenced summer abstraction rates are proving insufficient to address the deterioration in the state of the courses. Concerns have also been expressed should future EA flood alleviation work affect levels in the River Mole. This dialogue is ongoing. The now permitted increased abstraction rates could also modestly contribute to alleviation of possible downstream flooding issues on the River Mole.
- 3.5 Burhill provides two 18-hole courses; the Old Course at 6,481 yards (white tees) and the New Course at 6,591 yards (white tees) irrigation of both being an annual issue
- 3.6 In line with Government exhortations, BGL recognises the many potential adverse impacts of Climate Change and is working pro-actively across all its operations to build in resilience, thereby to sustain the quality of golf experience offered. It is recognised that an attractive and playable course leads to good business and revenue flows. Without addressing these potential future long-term impacts, there is a real prospect that the golf experience could decline in quality, not only here at Burhill but across all BGL's operations, with consequential financial impacts.
- 3.7 BGL recognises, through its Environmental Policies, that such in-built resilience should not be delivered or have an adverse impact on ecology or the wider environment.
- 3.8 Water scarcity is a critical concern for golf courses, especially during dry seasons. An inconsistent supply of water affects the quality of the course, leading to brown patches and negative aesthetic effects. Developing an irrigation facility can help offset and mitigate potential harms to the local ecosystems.

- 3.9 The proposed irrigation reservoir aligns with sustainable land use practices by re-purposing available land for an alternative purpose which can both benefit the golf course and the environment.
- 3.10 By investing in sustainable water management, the BGL demonstrates its commitment to environmental stewardship and responsible resource utilisation. This positive image can resonate with the local community and contribute to a strong reputation

4. The Development Proposal

- 4.1 Whilst the grounds of Burhill are extensive, the potential locations for the provision of the required additional water storage directed studies to the southeast part of the site, on higher ground above, and to the southeast of the alignment of the River Mole. The selected location is shown on the Location Plan 2807-PL01-EX01-001 and thereon outlined in red. The whole of the Burhill Club site is outlined in blue. The proposal as outlined in red extends to 4.88 acres (1.97 hectares) and is centred on NGR TQ 10989 2282. Easting – 510986 – Northing 162281.
- 4.2 The submitted Site Plan 2807-PL01-PL01-001 defines in more detail that location and also indicates the extent of the temporary working areas around the lake to be constructed. The plan also shows the route of access/egress for construction plant, equipment, materials and labour. This access route across the club site follows an established on-site trackway around the edges of the course. Entry onto the course will be either from Elevation Road or Old Common Road. These presently serve the working compound area for the course.
- 4.3 The submitted Site Section drawing BHL-001-R01-1 indicates that it is intended to create a storage reservoir of approximately 32,500 cu.m. capacity and of that capacity, 9,800 cu.m. is proposed above existing ground level.
- 4.4 The mechanised plant and equipment for the scheme will be delivered on a once-in and once-out basis and, save for materials (pond liner, trees, plants etc) there are not expected to be any significant additional movements along either route whichever is chosen for use. Both are directly accessed from A307. These routes are currently used for deliveries by articulated and flat-bed lorries for ongoing operations and site projects and lead directly into the course compound storage area.

5. Planning History

- 5.1 Relevant planning history in connection with the club, since 2020, comprises of application 2020/3002 which sought a Screening Opinion from the planning authority on the need or otherwise for an Environmental Impact Assessment in relation to this irrigation lake proposal. By decision dated 8th December 2020 the authority determined that an EIA was not required. A copy of that decision notice is included.
- 5.2 As previously mentioned, application 2020/2792 comprised a pre-app submission seeking the professional and technical opinion of officers as to the form and content of any later formal planning application for the irrigation lake as now being proposed and relative national and local planning policy issues. Advice was issued by letter dated 23rd November 2020. A copy of that decision letter is included.
- 5.3 Previous planning history, since 2017, is set out in the schedule recorded in the response letter made to the pre-app enquiry.

6. Planning Policy

- 6.1 National policy is set out in the latest iteration of the National Planning Policy Framework (December) 2023 (the Framework) together with National Planning Practice Guidance which is an iterative document.
- 6.2 Local Plan policies comprise of the relevant policies of the adopted Core Strategy 2011, the adopted Development Management Plan 2015, and supplemental planning documents dealing with flood risk (Flood Risk SPD 2012) and detailed design and character (Design & Character SPD 2016).
- 6.3 During the period of the preparation of this full planning application, Elmbridge Borough Council, as the competent planning authority, has been progressing the preparation of a replacement local Plan. That document, the Draft Elmbridge Local Plan 2037, was, on 19th July 2023, submitted for examination and an inspector has been appointed. That examination will shortly commence and continue during 2024 whereafter the inspector will issue a decision. There is already some slippage in the most recent timetable but, making due allowance and assuming no further unforeseen delays, it is still expected that adoption following examination might take place in late 2024.
- 6.4 Thus at the time of this submission, the emerging policies of the draft Local Plan 2037 should attract a limited degree of, but not full, “planning weight”.
- 6.5 The relevant policies of the Core Strategy 2011, as detailed in the pre-app response provided, comprise policies CS1, CS10, CS14, Cs15, CS17, and CS26. The relevant policies of the Development Management Plan 2016, again as previously detailed, comprise policies DM1, DM2, DM6, DM12, DM17 and DM21.
- 6.6 In the emerging review Local Plan 2037, the Principles which might appear most relevant to this proposal are
- Principle 1 - Tackling Climate Change,
 - Principle 2 – Protecting and Enhancing the Environment, and
 - Principle 4 – Growing a Prosperous Economy.
- 6.7 The policies of the emerging review Local Plan 2037 which might appear relevant to this proposal are:
- SS1 – Responding to the Climate Emergency
 - SS2 – Sustainable Place-making
 - CC2 – Minimising Waste and Promoting a Circular Economy
 - CC5 – Managing Flood Risk
 - ENV1 – Green & Blue Infrastructure
 - ENV2 – Landscape, Trees and Woodlands
 - ENV4 – Development in the Green Belt
 - ENV6 – Protecting, Enhancing and Recovering Biodiversity
 - ENV10 – Heritage Assets
 - ECO1 – Supporting the Economy
 - INF3 – Health and Wellbeing of Communities.

7. Planning Assessment

7.1 The main planning considerations to be addressed by this full application are guided by the response received to the pre-app made. These are:

- The principle of the development in the Green Belt and its impact upon openness
- The impact upon the character of the area
- The impact upon the amenities of neighbouring properties
- The impact on Flood Risk
- The impact on Trees and Biodiversity
- The impact upon Archaeology

Each of these issues will be address by this assessment, and expanded to reflect the relevant emerging policies to be considered as elements of the review Local Plan 2037.

7.2 Green Belt considerations - The site the subject of this application lies in the designated Green Belt. Strict planning controls exist in order to safeguard the character and openness of the Green Belt. The government's approach is set out in the National Planning Policy Framework (December 2023) "the Framework".

7.3 Chapter 13 of the Framework at paragraph 142 states that the government attaches great importance to Green Belts and makes clear that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are (i) their openness and (ii) their permanence.

7.4 Paragraph 143 makes clear the five purposes to be served by Green Belt land:

- To check the unrestricted sprawl of large urban areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the special character and setting of historic towns, and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.5 When determining proposals which lie within the Green Belt, Paragraph 152 of the Frameworks says that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 makes clear that "when considering any application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

7.6 That national policy position having been established, government policy as set out in paragraph 154, makes clear that with regard to new buildings in the Green Belt, there are certain exceptions, as listed 154(a) – (g). Those developments listed are not regarded as inappropriate development in the Green Belt per se. At (b) this list of exceptions includes "the provision of appropriate facilities (in connection with the

existing use of land or a change of use) for outdoor sport, outdoor recreation.....as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.”

- 7.7 Paragraph 155 lists certain other development forms which are again regarded as not inappropriate in the Green Belt, but again these exceptions are qualified by the requirement that they “preserve its {the Green Belt} openness and do not conflict with the purposes of including land within it”. Within that list at (b) are Engineering Operations.
- 7.8 The proposal the subject of this application is something of a hybrid in that it is both an engineering operation (and therefore not inappropriate development) as defined at 155(b) and it is also the provision of an appropriate facility within the existing and continued use of this land for outdoor sport and outdoor recreation, as defined at 154(b).
- 7.9 It is recognised that these bases for regarding the proposal as not inappropriate development are both qualified by the requirement to demonstrate that they (i) preserve the openness of the Green Belt, and (ii) do not conflict with the stated purposes for including land within the Green Belt.
- 7.10 The approach to decision-making appears as two steps: first, is the development appropriate to the Green Belt and if so, it’s principle should be confirmed? Second, is the consideration as to whether or not it preserves the five purposes of Green Belt designation including the aspect of openness. If the principle of the proposal is adjudged to be inappropriate, then there needs to be very special circumstances presented, the benefits of which outweigh the “in principle” objection. Also, as part of the consideration, is the issue of harms both within and out with Green Belt land.
- 7.11 It is thus requisite, and as requested by the pre-app response, that a submission is made which demonstrates that the proposal can be regarded as “appropriate development” within the Green Belt, either as an engineering scheme or as the provision of an “appropriate facility” (in connection with an existing use of land or a change of use) for outdoor sport, outdoor recreation.....
- 7.12 In greater detail, the proposed works constitute engineering operations to create a reservoir with an associated water abstraction and pumping arrangement. The reservoir will be constructed using only “cut and fill” techniques. There is to be no soil importation, save perhaps for a modest, currently uncalculated, amount of imported topsoils to supplement what is presently on site.
- 7.13 The facility is to be constructed within the bounds of the existing golf course and leisure activity area. It will support and enhance the use of the existing golf course and will deliver on corporate policies of sustainability, climate change mitigation and resilience.
- 7.14 The existing topography of the golf course landform in the vicinity of the proposal, as shown on the included topographical site survey drawing, is undulating and already engineered, with tees, greens and undulating fairways set amongst course mounding, naturalised grassed areas and blocks of woodland with interspersed

individual and grouped trees. This proposal is set within what is identified as the “New Course” but will serve both the “New Course” and the “Old Course”.

- 7.15 The landscape across the New Course is undulating with a plethora of small mounds and hills, ponds and ditches. The proposed reservoir banks will be raised but not markedly higher than the existing site levels or the surrounding area and the whole will be set against a backdrop of extensive woodland out with the course. These levels relative to existing ground are shown on the included site sections drawings
- 7.16 Those retaining banks will be seeded and naturalised within the landscape and the opportunity will be taken to enhance existing habitats, create new water-related habitats and deliver bio-diversity net gain as required by the Environment Act 2021.
- 7.17 Biodiversity Net Gains are demonstrated by use of the Natural England Bio-diversity Matrix 4 included and shown on submitted plans.
- 7.18 Whilst it must be recognised that there will be some very short-term visual impact immediately following construction, the site will mature and ultimately blend into the established character of this part of the Green Belt. It is asserted there will be no permanent material harms and the impact on the landscape, both physically and visually, is minimal and therefore acceptable. This proposal will not degrade the openness of the Green Belt in this locality, which, in any event, is extremely discreet and not open to wider publicly accessible viewpoints.
- 7.19 Whilst the proposal is not regarded by the applicant as “inappropriate development”, the creation of this irrigation storage facility will deliver
- a more dependable, economic and effective irrigation of the whole golf complex (current shortfalls in annual irrigation requirements are made up from an existing bore hole with only a modest agreed/authorised daily abstraction rate);
 - contribute to the BGL corporate aspiration of positively responding to climate change by building in resilience and
 - will further the corporate ecological policy aspirations.
- 7.20 This proposal is part of a funded sequence of such enhancements across various courses owned and operated by BGL, which are intended to build in sustainability and resilience.
- 7.21 Irrigation reservoirs have already been delivered at:
- Wycombe Height Golf Centre [Wycombe District Council – Planning ref: 19/09556/FUL],
 - Redbourn Golf Club (City & District of St Albans – Planning ref: 5/15/3082] and
 - permission has been obtained at Birchwood Park [Dartford Borough Council – Planning ref: DA12/01443/FUL] but is yet to be implemented.
- All these courses lie within Green Belt locations and are owned/operated by Burhill Group Limited. Wycombe Heights Golf Centre also lies within the defined Chilterns AONB.
- 7.22 Elsewhere irrigation reservoirs have been permitted at

- St George's Hill Golf Club [Elmbridge Borough Council - Planning ref:2013/0821], within Green Belt land and
- adjacent to Bearwood Lakes Golf Club [Wokingham Borough Council – Planning ref: F2012/0165].

Again, both of these courses are within the designated Green Belt.

- 7.23 It is considered that the proposal does not conflict with any of the five purposes for including land within the Green Belt. It will not be an alien feature within this Green Belt location and will not reduce the openness of the Green Belt.
- 7.24 The mitigation of any visual impacts which might arise are set out in and supported by the landscaping detail and plans included with the application.
- 7.25 As to any very special circumstances which might be thought required to justify the proposal, it should be recognised that Burhill Golf Club provides an extensively used and very much appreciated leisure and recreational facility both to local residents and the wider business community. It has existed here for well in excess of 100 years and through sound management and a forward-thinking organisational structure it responds to changes accordingly. It operates corporate policies which pro-actively address current concerns and BGL, the parent company, innovates solutions in advance of perceived future threats to its business model.
- 7.26 Climate changes have been recognised by BGL for many years. It is appreciated that a “do nothing” approach will positively lead to a degradation of course condition. The increasing lack of adequate, sustainable and dependable water resources will ultimately lead to decline in the attractiveness of the courses, the playability of the courses, member enjoyment of the recreational aspects and decline in revenues. BGL is proactive in positively responding to these recognised threats and is progressively implementing sustainable management across its portfolio of operations. Hence the approval of schemes, even in Green Belt (and AONB) locations, of water storage facilities.
- 7.27 Impacts on the Character of the Area – the pre-app response recognises that the modest banking of soils to form the reservoir enclosure will raise the land levels and alter the appearance of the locality. However, it is also recognised that the selected location is very discreet within the course and that there are no publicly accessible viewpoints from which the facility could be seen.
- 7.28 The course and the wider area around the proposed location is characterised by an open engineered landscape of mown and naturalised grassland with woodland blocks, plus individual and grouped trees. To the immediate southeast is a dense and extensive block of woodland which forms a backdrop to limit the open visual impression. The tees and greens are close mown as one would expect on an established golf course and naturalised lesser kempt grassland areas are maintained for both visual diversity and ecological habitat value.
- 7.29 There are a scattering of ponds and small lakes incorporated across both the Old course and New course and these are shown on the map included with the application documents.

- 7.30 Whilst perhaps more regular in appearance and somewhat larger than other water bodies on the course, the mounding around the proposed irrigation reservoir will be softened by landscaped grassland as detailed in the submitted Landscape Plan. This will contribute to blending the facility in as a more natural landform very much akin to the existing reservoir to the south (which also serves other purposes). This proposed water body would not appear as an alien feature in the landscape and, once matured, will have no significant adverse long-term impact on the visual character of the area nor indeed on the openness of the visual aspect.
- 7.31 It is asserted that this proposal will have no adverse or perceptible impact on the character of the area, being already an engineered and variously contoured landform. The landscaping proposed within the submission will serve to mitigate even further any visual or other character impacts.
- 7.32 Impacts upon the Amenity of Neighbouring Property – There are no residential dwellings within close proximity to the site of the proposal. There are a small number along those roads which could be used to access the site for development purposes but those dwellings are already impacted by existing delivery activity associated with the operation and maintenance of the golf course.
- 7.33 Those access routes are already familiarly used by articulated and flat-bed lorries to deliver materials and machinery to the course. The equipment and plant to be used for the execution of the scheme will be similarly delivered on a “once-in, once-out” basis and it is not expected that any undue or unneighbourly disturbance will be caused by the modest number of additional vehicle movements.
- 7.34 The siting of the ACS International School at Cobham beyond the substantial woodland area southeast of the proposal would be entirely unaffected by the presence or appearance of the reservoir and it is asserted that the reservoir would have no adverse impacts or cause any harms to any residential amenity.
- 7.35 Impact on Flood Risk – as sought by the pre-app response, a full Flood Risk Assessment was carried out, on instructions from BGL, by Lanmor Consulting, Civil Engineers and Transport Planners and a copy of their report is included in the submission documents, reference 231719/FRA/AG/KL/01, dated July 2023.
- 7.36 That report concludes that the storage facility will not receive runoff from the surrounding ground and will be replenished from the existing EA authorised extraction point. The water levels will therefore be controlled to avoid over-filling. By virtue of the capacity to be delivered, this storage facility will be subject to the provisions of the Reservoirs Act 1975 (as amended) and will be regularly inspected for safety, security, stability and operation during its lifespan. Its initial design will also be pre-agreed before construction.
- 7.37 The site of the proposal is shown on the EA Flood Maps as lying within Flood Zone 1, and would not, in itself, be subject to flooding. Subject to regular inspection, the report concludes that the proposal would be safe but, in any event, should a breach happen, outflow and escape of water would only affect uninhabited land, the

anticipated route of which is shown within the report. Ultimately, any such residual flows would return water to the River Mole, after some natural absorption into ground. It should be noted from the Irritech plan and sections that less than one third of waters contained will lie above existing ground level which, of itself, will limit the potential volume of water lost in the event of any breach.

- 7.38 It should also be mentioned that with the now authorised increased rate of water abstraction, particularly during winter months, that there could be a potentially modest alleviation of possible downstream flooding.
- 7.39 As the proposal is not on a site at risk from surface water flooding, the scheme does not require the provision of a SUDs arrangement. Water stored within the facility will regularly be released and used for course irrigation across both the Old course and the New course.
- 7.40 Impact on Trees – as was perceived in the response to the pre-app submission, there are no tree within the scheme area which are subject to Tree Preservation Orders or other protections. There are no known veteran trees on site. As sought by the pre-app response a full AIA and AMS has been prepared by RMT Tree Consultancy Limited and this is included within the submission documents. The report, prepared in accordance with BS.5837-2012, is reference RMT 931 and dated December 2023. The report includes a number of attachments and plans included in the document list.
- 7.41 The report also details tree protection measures and where required, root protection areas and measures.
- 7.42 In summary, the report identified seventeen individual trees and three tree groups, categorised in accordance with BS.5837-2012. The trees are listed in Table of the report. Of those identified trees, at the date of survey, ten trees and one group were assessed as Category B and of moderate value and remaining trees were assessed as Category C and low value.
- 7.43 Paragraph 4.2 of the report details trees which will be required to be removed to facilitate the scheme, comprising one Category B tree and one Category C tree together with two Category C groups. Tip reduction and some modest crown lifting is recommended elsewhere.
- 7.44 The engaged Tree Consultancy has worked jointly with the appointed Landscape Consultant and UES, the ecology consultancy, in the formulation of the submitted Landscape Plan, such that the potential impact of tree losses is mitigated by tree replacement and supplemental planting in the locality and wider areas across the course.
- 7.45 Whilst it is recognised that tree losses will be sustained to facilitate the scheme, the quality of trees lost, save for the one moderate value Category B tree, is low. It is asserted that the tree replacements, coupled with more extensive landscape planting, will more than adequately compensate those losses.

- 7.46 As specified in the report and AMS, where scheme works are proposed within proximity of trees to be retained, protection will be fully afforded, including to RPAs.
- 7.47 Impacts on Archaeology and Heritage Assets – as recommended by the pre-app response obtained, the scheme has had regard both to heritage assets and the potential for archaeological finds. Accordingly, an Archaeological Desk-Based Assessment has been carried out of the location for the scheme by Border Archaeology – Archaeological and Built Heritage Services. That report is included in the submission and is reference BA2288BS, dated September 2022 and centred on NGR TQ10989 2282.
- 7.48 In summary, and as recorded in the report,
- the potential for evidence of Pre-historic activity is assess as Moderate;
 - the potential for evidence of Romano-British activity is assessed as Low;
 - the potential for evidence of Medieval activity is assessed as Low and
 - the potential for evidence of Post-Medieval is assessed as Low-Moderate.
- 7.49 The recommendation set out by the consultant has been considered and it is suggested that any such further study, overview or investigation might be dealt with by a suitably worded condition, requiring, in first instance the appointment of a specialist consultant to over-see initial site stripping and opening-up. This could be coupled with a further requirement that, if any materials of interest are thereby revealed, a written scheme for further investigation (WSI) be prepared in agreement with Surrey County Council – Historic Environment Planning Team.
- 7.50 The New course, within which this proposal will sit, was developed in accordance with a permission issued reference 98/0572 dated 1st July 1998. This was a parallel second application for extension to the golf course to that reference 97/1141 which was itself the subject of a public local inquiry appeal. The results of that appeal are unrecorded but the decision 98/0572 pre-dates the appeal hearing date. A search of records held by the planning authority online does not reveal any information regarding archaeological issues and it would be not unreasonable to assume that with regard to any such located close to then existing soil levels, they would have been disturbed by engineering works of re-grading and contouring then.
- 7.51 Impacts on Bio-diversity – to respond to policy and to address and better understand the potential for the proposed scheme to impact bio-diversity, detailed examinations and surveys have been undertaken, thus to inform a more complete planning submission and make proposals which will meet both national and local policy requirements.
- 7.52 Initially, a Pre-liminary Ecological Appraisal was undertaken in 2020 by Ecology by Design. A copy of that report is included in this submission. Whilst that report was commissioned through previous external advisors, Reading Agricultural Consultants Limited, the work directly involved a study of the application site and the wider Burhill estate. This report formed part of the pre-app submission.

- 7.53 In its conclusions in chapter 5, inter alia paragraph 5.1 dealing with Designated Sites, it opines that the proposal is sufficiently distant from such sites that the proposal will result in no negative impact on such sites.
- 7.54 However at paragraph 5.2, dealing with the evaluation of the importance of habitats and species, and using the criteria set out in the included Appendix 5, whilst it opines that the majority of habitats are of negligible importance it also records that some habitats may support protected species which may be important at local level.
- 7.55 At paragraph 5.3, it opines that, as there is to be no lighting proposed, it is considered there will be any long-term impact on any bats locally present. The proposal will not impact negatively their foraging opportunities or commuting routes. However, it is considered that the proposal has the potential to impact Great Crested Newts and accordingly a presence/absence site survey is recommended. The extent of the survey and methodology is set out in paragraph 5.4.
- 7.56 Based upon this PEA, a detailed eDNA survey for Great Crested Newts was undertaken by UES in accordance with instructions from the applicant. A letter report of those findings, dated 11th May 2021, is included in these application documents. This further investigation covered five ponds within the area of study and ditches and samples were collected. Laboratory analysis of the eDNA samples returned negative results for all five ponds and ditches. It can be satisfactorily concluded that this proposal will not negatively impact on any GCN populations, if present, across the Burhill estate.
- 7.57 Most recently, and in accordance with further instructions, UES, working together with M D Landscape, has undertaken a Biodiversity Net Gain Assessment of the proposal, the purpose of which is to:
- establish the total number of baseline habitat, hedgerow and watercourse units at the site of the proposed development;
 - establish the total number of habitat, hedgerow and watercourse units which will be created, retained and/or enhanced under landscape and ecological mitigation proposals at the site of the proposed development;
 - determine whether the proposed development will result in a net loss, no net loss or net gain for biodiversity, and
 - recommend additional enhancement/compensation measures to ensure a positive outcome for BNG is achieved.
- 7.58 It became apparent that within the footprint area of the storage reservoir proposal there was unlikely to be sufficient opportunity to deliver the BNG requirements and additional sites were sought across the wider Burhill estate, within the “blue” outlined land in the ownership or control of the same applicant.
- 7.59 Accordingly, co-working as between M D Landscape and UES details proposals on the included Landscape Plan which address BNG impacts by the provision of landscaping and creation of habitats on land both within the “red” application site and within the wider “blue” land of the estate.

- 7.60 In combination, the extent of the proposed landscaping works fully responds to the need to deliver a positive BNG outcome. The UES report opines that, with regard to the post-development scenario, the proposed development will result in:
- a 3.53 gain in habitat units, amounting to an 18.82% BNG, and
 - no change in hedgerow or watercourse units.
- 7.61 The report confirms that, in addition to the proposed net gains, all trading rules within the metric have been met and the net gain provided exceeds the requirement of both local and national planning policy. The development as proposed and delivered will be compliant with both local and national planning policy requirements.
- 7.62 Impacts on Minerals & Waste - The current Minerals and Waste Planning Policies, formulated and adopted by Surrey County Council, comprise an element of the statutory plan for the location of the proposal. The Plans comprise the Surrey Mineral Plan 2011 (together with its Development Plan Documents and Guidance) and the Surrey Waste Local Plan 2019-2033, adopted in 2022.
- 7.63 Additionally, the Waste planning authority is in course of updating its Local Plan policies which, it is intended, should deliver a new comprehensive Minerals & Waste Local Plan. That preparation is at an early stage, with a second “Call for Sites” being currently open, closing shortly in 2024. The Mineral Plan 2011 and the Waste Local Plan 2019-2033 are the material components of the statutory plan for consideration at this time in connection with the proposal for determination.
- 7.64 The application site falls within the designated limits of a Mineral Safeguarding Area for concrete aggregates, as defined in the adopted plan. However, the proposal is sited close to the fringes of the designated area and, having regard to the existing use, the nature of the landform and the proposal itself, it is considered that, if it is resolved to grant permission, such would not be prejudicial to the application of policy. Such position is supported by and recorded in the pre-app response obtained and remains extant.
- 7.65 Contamination – Historical mapping and aerial photography available shows the site the subject of this proposal to have been agricultural land prior to it becoming a golf course. The recorded history of the site, derived from the Burhill Golf Club web pages informs that a mansion house as a private residence, was first erected on part of the wider estate in 1726 and passed through various ownerships until it was destroyed by fire in 1861.
- 7.66 In 1881, Sir Edward Cecil (the future 1st Earl of Iveagh) acquired the by then redeveloped private residence and the estate. In 1906, Rupert Cecil (the future 2nd Earl of Iveagh) leased the property to a group of local businessmen for development as two 18-hole golf courses which lead to the opening of the Burhill Golf Club in 1907.

- 7.67 In 1939 Lord Iveagh agreed with club members that the new course would close in order to provide grazing for sheep and highland cattle to assist the government in providing home grown food to support the war effort and in 1940 Lord Iveagh agreed with the government that the Ministry of Aircraft Production could requisition the clubhouse at Burhill Golf Club for use of a workforce of 200, headed by Barnes Wallis, (later Sir Barnes Wallis CBE FRS).
- 7.68 In 1947, the ownership and control of the club, its house and grounds were restored to the members and the Old Course was recovered. In 1999, plans were approved for a second course, (the South Course, later to be known as the New Course) with that New Course, together with the Clubhouse, being officially re-opened by the 4th Earl of Iveagh on 3rd September 2007.
- 7.69 With a reasonable degree of confidence it can be asserted that, with the exception of the war years, the entire estate has either been in use as amenity grounds to a private residence or alternatively as grazing land. It is asserted that the prospect for contamination on the site, or the previous use of any part of the site for contaminative purposes, can be excluded. It should be noted that the completion of this scheme would not involve the removal of soils from site and thus there would be no risk of giving rise to any contamination elsewhere. Furthermore, as the scheme does not comprise a change in the use of the land as a golf course, there is no prospect that the intended use would be likely to be adversely affected by soil condition. The continued use of the land as a reservoir as part of an established golf course is not a use which, in any sense, would be susceptible to the presence of contamination.
- 7.70 From the pre-app response provided, it has been established that the site does not fall within the Contaminated Land database and no records are available that would raise concerns in terms of potential contamination. These records are supportive of the position set out above.

8. Summary and Conclusions

8.1 This scheme, as detailed in this report together with the submitted plans, reports and matrix 4, shows that a proposal to develop an additional irrigation reservoir within the New course at Burhill Golf Club will be acceptable in terms of the following:

- Subject to specified required amplification, the pre-app response obtained has indicated that the development proposal could be supported;
- The proposed scheme, as detailed, represents a well-considered opportunity to upgrade existing water sourcing and storage at Burhill Golf Club for the purpose of spray irrigation, thus to maintain the quality and playability of the two courses;
- The proposed scheme delivers greater than national and local requirements for BNG and makes better use of under-utilised land within the wider course;
- The reservoir represents a highly sustainable form of appropriate development, examples of which have, in many other locations within Green Belt designated land, been found acceptable;
- The proposal will help to minimise vulnerability and will provide resilience to the potential impacts of climate change through supporting the efficient use of water resources;
- The proposal will comprise only modest ground re-contouring work and when complete and matured, will be screened by existing and proposed landscaping so as to appear a natural feature which will continue to preserve the openness of the Green Belt
- As demonstrated by the ecological assessments, the development will not impact protected species
- The proposal fully accords with national planning policy, as set out in the Framework, with local policy as set out in the Statutory Plan and with emerging Principles and policies of the emerging plan 2037.

8.2 Government National Planning Policy, as set out in the Framework (December 2023), makes clear at Section 2 that the purpose of the planning system is to contribute to the achievement of sustainable development including, inter alia, commercial development and supporting infrastructure, in a sustainable manner. Achieving sustainable development means that the planning system has three over-arching objectives which are interdependent and need to be pursued in mutually supportive ways. Those three objectives are: economic, social and environmental.

8.3 At the heart of the Framework is a presumption in favour of sustainable development as set out in more detail in paragraph 11. This presumption is, in relation to decision-making, qualified by paragraphs 11(c) and (d).

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- 8.4 At Section 4 paragraph 38, government exhorts planning authorities to approach decisions on development proposals in a positive and creative way and work pro-actively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. The Framework exhorts authorities to seek to approve applications for sustainable development where possible.
- 8.3 On this basis, and in light of the supporting evidence, reports and plans submitted herewith, the council is respectfully requested to grant consent to the proposal and permit the development of an irrigation reservoir at Burhill Golf Club.

9. Planning Conditions

9.1 The Framework, at paragraph 55, makes clear that planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of planning conditions or planning obligations but also makes clear that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

9.2 Paragraph 56 of the Framework makes clear that planning conditions should be kept to a minimum, and only used where they satisfy the following tests:

- necessary;
- relevant to planning;
- relevant to the development to be permitted;
- enforceable;
- precise; and
- reasonable in all other respects.

These are referred to in National Planning Practice Guidance (the Guidance) as the 6 tests, and each of them need to be satisfied for each condition which an authority intends to apply.

9.3 Early engagement and positive dialogue between the local planning authority and the applicant can also result in planning permission being granted with fewer conditions attached. Effective pre-application discussions can help to establish early in the process what may need to be the subject of conditions. Clear and precise reasons must be given by the local planning authority for the imposition of every condition.

9.4 The applicant is open to discussion with the authority as to the nature and scope of planning conditions to ensure the development is acceptable.

10. Application Documents List

- 10.1 Terrain Surveys - Topographical Site Survey – TS22-336-1-2D and TS22-336-2-2D – July 2022
- 10.2 Form Architecture – Location Plan – 2807-PL01-EX01-001
- 10.3 Form Architecture – Site Plan – 2807-PL01-PL01-001
- 10.4 Irritech Limited - Site sections – BHL001-R01-1
- 10.5 Ecology by Design – Preliminary Ecological Appraisal – EBD-01110 – January 2020
- 10.6 Elmbridge Borough Council - Pre-app Response – 2020/2792 – 23rd November 2022
- 10.7 Elmbridge Borough Council – EIA Screening Opinion – Decision Notice – 16th October 2020
- 10.8 United Environmental Services Limited (UES) – Great Crested Newt eDNA Survey Report – UES - 02258/04 – dated 11th May 2021
- 10.9 Border Archaeology – Archaeological Desk-Based Assessment – BA-2288BBS – dated September 2022
- 10.10 Lanmor Consulting – Flood Risk Assessment – 231719/FRA/AG/KL/01 – dated July 2023
- 10.11 RMT Tree Consultancy Ltd – Arboricultural Survey Impact Assessment & Arboricultural Method Statement to BS.5837-2012 – RMT931 – dated 14th December 2023
- 10.12 RMT Tree Consultancy Ltd – Arboricultural Survey Impact Assessment & Arboricultural Method Statement to BS.5837-2012 – RMT931 – dated 14th December 2023 – Appendices 3,4,5,6 & 7, - Tree Constraints Plans
- 10.13 RMT Tree Consultancy Ltd – Arboricultural Survey Impact Assessment & Arboricultural Method Statement to BS.5837-2012 – RMT931 – dated 14th December 2023 – Appendices 8,9,10,11 & 12 – Tree Protection Plans
- 10.14 M D Landscape – Landscape Proposals Plan – Areas A, B & C – Specification & Planting Schedule – 305/L/104 – dated December 2023
- 10.15 UES – Biodiversity Net Gain Assessment Matrix 4 – dated January 2024