



**Elmbridge**  
Borough Council  
*... bridging the communities ...*

Civic Centre  
High Street, Esher  
Surrey KT10 9SD  
01372 474474  
contactus@elmbridge.gov.uk  
elmbridge.gov.uk

Mr Derek Marlow  
via email: [REDACTED]

contact: Matt Harris  
phone: [REDACTED]  
e-mail: tplan@elmbridge.gov.uk

23 November 2020

Dear Sir/Madam

### **Pre-application Enquiry**

Proposal: Formation of an irrigation reservoir to supplement sustainable irrigation of the existing two golf courses at Burhill Golf Club.

Location: Burhill Golf Club Burhill Hersham Walton-On-Thames Surrey KT12 4BX

Pre-application Number: 2020/2792

Date of Site Visit: 4<sup>th</sup> November 2020. Meeting Held via Zoom on 10<sup>th</sup> November 2020.

Thank you for your pre-application enquiry concerning the above. I can offer the following comments:

### **Description**

The site consists of a golf club, with two courses, located to the south of Burwood Road, Hersham. The site subject to the proposal is located to between the course boundary and the fairway to the 13th hole on the new course, which is to the north of the existing lake adjacent to Norwood Farm and towards the boundary with the ACS Cobham International School.

### **Constraints**

The relevant planning constraints are:

- Green Belt
- Mineral Safeguarding Area
- Adjacent to deciduous woodland that is a Priority Habitat – Natural England
- Close proximity to ordinary watercourse buffer – 8m
- Close proximity to Esher Commons SSSI
- TBHSPA 400m-5km Buffer Zone.

### **Policy**

In addition to the National Planning Policy Framework and the National Planning Practice Guidance, the following local policies and guidance are relevant to this pre-application enquiry:

- Core Strategy 2011
  - CS1 – Spatial Strategy
  - CS10 – Cobham, Oxshott, Stoke D'Abernon and Downside
  - CS14 – Green Infrastructure
  - CS15 – Biodiversity
  - CS17 – Local Character, Density and Design
  - CS26 – Flooding

Development Management Plan 2015

DM1 – Presumption in favour of sustainable development

DM2 – Design and amenity

DM6 – Landscape and trees

DM12 – Heritage

DM17 – Green Belt (development of new buildings)

DM21 – Nature Conservation and biodiversity

Design & Character SPD 2012

Flood Risk SPD 2016

**Relevant Planning History**

<b>Reference</b>	<b>Description</b>	<b>Decision</b>
2020/3002	Screening Opinion as to whether an Environmental Impact Assessment is required for a proposed reservoir.	Undetermined
2020/0096	Retrospective application for boundary fence to a height of 1.8m.	Refused/Appeal Lodged
2018/1737	2 single-storey "Half Way Huts" (66 sqm) located at the 9th green on both the Old and New Course.	Granted
2017/3565	The realignment of holes 5, 6 and 9 and construction of mini roundabout on internal access road together with other minor road changes.	Granted Listed Building Consent
2016/3024	Re-landscaping of land adjacent to Burhill Manor incorporating replacement York flag stones	Granted
2016/2406	Alterations to the access and gatehouse buildings, including entrance pillars (a maximum of 2.6m high), new fenestration and wall treatment and re-organisation of the parking and landscaping	Granted
2015/3396	2 single storey "Half Way Huts" (66 sqm) located at the 9th green on both the Old and New Course	Granted
2013/4138	Change of use of land from residential garden (class C3) to additional area of golf course and erection of 10 metre high ball stop fence	Refused
2007/1472	Replacement bridge over River Mole and alterations to approach road	Granted
2004/0913	Golf academy involving demolition of existing ancillary buildings (comprising sports hall and garage block, Artisans clubhouse, maintenance workshops, two semi detached dwellings, golf driving range and other ancillary buildings), erection of a single storey accommodation wing and single storey academy training pavilion, re-grading and landscaping of existing practice areas, new golf driving range, putting green, landscaping, parking and access arrangements. Revised proposal following the refusal of 2003/0580, including offer of Unilateral Undertaking not to use the accommodation wing as a hotel	Refused
2003/0580	Golf academy incorporating single-storey	Refused

	accommodation wing and single-storey academy training pavilion, ancillary buildings re-grading and landscaping of existing practice areas, new golf driving range, putting green, landscaping and parking arrangements, following demolition of existing ancillary building	
2000/0265	Change of use of two residential cottages to ancillary Club House use, alterations and extensions to existing golf Club House and Pro Shop, felling of trees, alterations to surrounding hard and soft landscaping to form new terraces and paths following demolition of bike sheds	Granted

## Planning Considerations

The main planning considerations are:

- The principle of the development in the Green Belt and its impact on openness
- The impact on the character of the area
- The impact on the amenities of the neighbouring properties
- The impact on Flood Risk
- The impact on trees and biodiversity
- The impact on archaeology

### The principle of the development in the Green Belt and its impact on openness

The National Planning Policy Framework 2019 (NPPF) states that “when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt” (paragraph 144). Paragraph 143 states that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”

Exceptions to this are set out in paragraph 145, one includes:

- The provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Paragraph 146 sets out certain other forms of development that are also not inappropriate in the Green Belt – provided they preserve the openness and do not conflict with the purposes of including land within it.

- Engineering operations

It is possible that either of these exceptions could be used, however insufficient information is provided at this point to determine whether the proposal is an appropriate facility for outdoor sport/recreation and whether it would preserve openness. This would need to be demonstrated with a future planning application. The banking around the reservoir would be high and creates bunds that would have a degree of impact on the openness of the site, although I recognise this would be landscaped and ‘green’.

During the meeting you advised that Burhill Golf Limited has submitted planning applications for reservoirs for other golf courses in the UK and that one was considered by the Planning Inspectorate. It would be useful to provide further information in this regard to support any application.

I do not consider the proposal would conflict with the purposes of including land within the Green Belt.

With a Green Belt supporting statement, I would recommend that you identify the benefits of the scheme, which could be considered as very special circumstances, should it be concluded that the development is inappropriate development. In line with paragraph 144 of the NPPF, VSC will not exist unless the potential harm to the GB by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

#### The impact on the character of the area

The proposal would include banking that would raise land levels and alter the appearance of the area. However, the site is not materially visible from outside of the golf course, which is well screened, whilst lakes are commonly associated with golf courses and I do not consider this would be an alien feature. Furthermore, I note the adjacent reservoir to the south of the proposal site.

As such, it is unlikely that the proposed reservoir would have an adverse visual impact on the character of the area.

#### The impact on the amenities of neighbouring properties

The site is located at a substantial distance to residential properties and given the nature of the development, it is not considered the proposal would adversely harm residential amenities.

#### The impact on flood risk

The application site is not at risk from flooding, however due to the nature of the development I consider it will be necessary to provide details to ensure the scheme does not result in flood risks. It has been advised that discussions have been held with the Environment Agency and I recommend advice is sought regarding potential flood risk implications.

A Flood Risk Assessment (FRA) will be required and this should demonstrate how the proposed development will be made safe, that it will not increase flood risk elsewhere and, where possible, will reduce flood risk overall. The FRA should be produced by a suitably qualified person. Guidance on producing an FRA can be found in the Council's Flood Risk Supplementary Planning Document 2016, which is accessible using the following link: <https://www.elmbridge.gov.uk/planning/sdps/flood-risk/>

Proposals for major development, or development on any site at risk from surface water flooding, will be required to incorporate Sustainable Drainage Systems (SuDS) into the design of the scheme. Some examples of these measures can be found on pages 49 to 51 of the SPD. You will need to take into account different factors including the layout of the site, topography and geology when planning and positioning different SuDS elements for the whole scheme. This information will be required for both outline and full applications, so it is clearly demonstrated that the SuDS can be accommodated within the development that is proposed. You will need to submit a separate Statement on SuDS as a validation requirement, and Surrey County Council (in their capacity as the Lead Local Flood Authority) will be consulted. The County Council has produced additional guidance on SuDS. This can be accessed using the following link: <https://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/more-about-flooding/suds-planning-advice>

#### The impact on trees

From the plans supplied the location of the proposed reservoir does not conflict with any protected trees or areas of designated ancient woodland. From the initial location plan laid over the existing

aerial site photo there are some trees identified that would need to be removed to accommodate the location of the reservoir, whilst there is a larger group of trees which comes into closer proximity towards the north east corner. Without supporting arboricultural information it is difficult to determine the potential arboricultural impact on the site. However, if the trees are of a relatively young or insignificant nature and mitigation tree planting can be included to replace the trees removed, the Council would likely be able to support the proposal on arboricultural grounds.

Where trees are within influence any future application should be supplied with the necessary supporting arboricultural information in line with the national and Council's own validation requirements as outlined below.

*National requirements:*

Site plans need to accurately show the position of all trees on the site and those on the adjacent land (including street trees) that may influence or be affected by the proposed development and development related operations.

*Local requirements:*

Supporting arboricultural information should consist of:

- Tree survey
- Arboricultural impact assessment
- Tree protection information
- Tree protection plan
- Arboricultural method statement

The arboricultural information supplied must be to British Standard 5837:2012 – Trees in relation to design, demolition and construction – Recommendations, and produced by a suitably qualified and experienced professional.

These recommendations are made in regard of government Planning Practice Guidance and the National Planning Policy Framework.

The impact on biodiversity

The site is located in close proximity to a SSSI and an area of deciduous woodland that is designated by Natural England as a priority habitat. As such, ecology will be a key consideration and it is likely that a reservoir would draw its own benefits.

A Preliminary Ecological Appraisal has been submitted with the application and this indicates further surveys are required in respect of Great Crested Newts and the timings for undertaking the relevant surveys. The Council would consult with the Surrey Wildlife Trust and I would recommend you engage with the Trust to discuss any biodiversity constraints of the site and the details that would be required for any future application.

As discussed, it is likely that a landscaping plan and Construction Ecological Management Plan would be required, however in other cases across the borough this has been subject to a pre-commencement condition, subject to approval.

The impact on archaeology

The site is over 0.4ha in area. Policy DM12 of the Development Management Plan 2015 states that development proposals should take account of the likelihood of heritage assets with archaeological significance being present on the site and assess the significance of such assets and enhance understanding of their value. An Archaeological Assessment should be provided as part of the application to determine the likely presence of heritage assets with archaeological significance on site. Based on the Assessment results, further investigation, defined by a Written

Scheme of Investigation, may then be required. The Archaeological Officer from the Historic Environment Planning Team at Surrey County Council would be consulted on any forthcoming application.

#### Other matters

In regard to Contaminated Land, the historical mapping and aerial photography held indicates the site was agricultural fields before becoming a golf course. The site does not fall within the Contaminated Land database and no records are available that would raise concerns in terms of potential land contamination. It is good practice for the developer to confirm the history of the site and any concerns as a result. However, given the information available it is unlikely that the proposal would result in land contamination issues.

I have contacted Surrey CC Minerals and Waste Department regarding the impact on the mineral safeguarding area (MSA), which is designated for concreting aggregate. SCC advise informally that the site is towards the edge of the MSA and as the golf course is an existing use, it is unlikely SCC would raise any objections to the irrigation reservoir.

#### **Conclusion**

On the basis of the above, subject to being an appropriate form of development in the Green Belt, and submitting the relevant justification, surveys and assessments a planning application could be supported and progressed. If it is concluded the development is inappropriate then it would need to demonstrate VSC and these should be included in any submission, even if it is your opinion the development would constitute 'appropriate' development.

To ensure the swift registration of your application, you are advised to refer to the Council's validation checklist and ensure that all of the required documents are submitted together. The checklist can be found using the following link: <http://www.elmbridge.gov.uk/planning/requirements>

Initially I would recommend that you submit all relevant plans and cross-sections; Green Belt Statement; Flood Risk and Drainage Strategy; Arboricultural Report; Ecological Appraisals and up to date surveys; landscaping plans; Archaeological Assessment.

The advice we have provided is a Planning Officer's informal opinion based upon the information you have provided. Our advice cannot fully anticipate the formal consideration process of a planning application following consultation and site inspection; neither will it be binding on the consideration of any resulting application.

Yours sincerely



Peter Brooks  
South Area Team Leader

For Head of Planning Services