

Report of the Corporate Director of Planning & Community Services

Address UXBRIDGE GOLF CLUB THE DRIVE ICKENHAM

Development: Remodelling works to improve the quality and condition of Uxbridge Golf Course, consisting of reshaping works using imported inert soils and extensive landscaping to enhance visual and ecological amenity.

LBH Ref Nos: 4601/APP/2009/2622

Drawing Nos: 500.01 Rev: A
500.02a Rev: B
500.2b Rev: B
500.3 Rev: A
500.04a Rev: A
500.04b Rev: C
500.05 Rev: A
500.10 Rev: A
500.07 Rev: A
500.08 Rev: B
500.09
500.11 Rev: A
500.12 Rev: B
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Ecological Impact Assessment
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Impact Statement
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Design and Access Statement

Date Plans Received: 03/12/2009 **Date(s) of Amendment(s):**

Date Application Valid: 03/12/2009

1. **SUMMARY**

Planning permission is sought for the remodelling and overhaul of the existing Uxbridge Golf Course. The key elements of the proposal involves the importation of 375,665 cubic metres of inert construction material and soil for landscaping and re-contouring purposes, the creation of a new temporary site access, off Skip Lane, to be used in conjunction with the existing access off the A40 slip road, for deliveries of the material. It is proposed to remodel the course on a phased basis, extending over an estimated 88 week period. The proposal involves no new buildings but is essentially the creation of a new landscape. This will involve the removal of selected trees and much of the grassland, the importation of inert soil, the creation of new land-form, installation of new drainage, new planting, habitat creation and subsequent management as an 18 hole golf course. The landscape objectives include the retention of individual specimen trees (notably the Oaks), semi-natural woodland, ditches, valley bottom wetland features and footpaths.

The imported material is defined as waste material for planning and environmental purposes and the application has therefore been referred to the Mayor.

67 individual letters of objection and 6 petitions, (bearing a total of 159 signatures) have been received, objecting to the planning application. In addition, objections have been received from Ickenham Residents' Association, North Uxbridge Residents' Association, The Association of Residents' of The Drive (North) and The Drive Residents' Association. The principle areas of concern relate to the volume of in-fill, impact on local residents from a potential 9800 HGV movements on local roads over a period of up to 100 weeks, impact on the Green Belt and landscape character, impact on local ecology and Nature Reserves, disruption to the golf course, concern over the removal of so many mature trees and disruption to the public rights of way.

The general principle of the development is considered acceptable, as the proposal is for the remodelling and improvements to the existing Golf Course, an appropriate Green Belt use. It is considered that the proposal complies in general with the key theme contained within PPG2, Saved UDP and London Plan Green Belt Policies, by keeping the land permanently open.

In terms of the impact on the Green Belt, the proposed changes to the landform will not result in any new high points, or ridges which would break the skyline, as all newly raised levels will be accommodated generally within the existing range of contours. While significant areas of trees will be removed to accommodate the new landform, the specimen trees and areas of woodland with the greatest visual landscape and ecological value will be retained. Generally, it is considered that the visual impacts of the proposal are unlikely to be of significant detriment to the character of this part of the Green belt and Colne Valley Regional Park.

The imported material is defined as waste material for planning and environmental purposes and the application has therefore been referred to the Mayor. Concerns on the high values derived for the human health import criteria remain and it is not considered that the levels of some contaminants would be acceptable for what is currently an uncontaminated golf course.

The application does not clearly illustrate the route of the proposed northern haul road or provide details of the proposed access at the northern boundary of the Golf Course, or provide sufficient information regarding the impact of these works on existing vegetation, including loss of trees.

Neither has the application demonstrated that the proposed development could be completed without detriment to the recognised ecological value of this area, including the adjacent Nature Conservation Sites of Metropolitan or Borough Grade I and II Importance, within which there are designated Nature Reserves and a Site of Special Scientific Interest (Frays Farm Meadows). Concerns are raised in particular to the impact of the development on the hydrology and water quality in these nature conservation sites, together with potential impacts on populations of water voles and badgers.

In addition, the application has failed to include details of the route/s of delivery lorries or breakdown of delivery lorry movements during the day, particularly during the traffic sensitive peak hours. The application has also failed to include satisfactory information in relation to road safety at the junction of Harvil Road and Skip Lane, at the access point off Skip Lane, and details of the northern access point, including levels and gradients. In the absence of this information, it is considered likely that the proposals would lead to conditions detrimental to road safety and lead to traffic congestion on the local road

network.

The application is therefore recommended for refusal for these reasons.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The application has failed to include details of the route/s of delivery lorries and a breakdown of delivery lorry movements during the day, particularly during the traffic sensitive peak hours. The application has also failed to include satisfactory information in relation to road safety at the junction of Harvil Road and Skip Lane, at the access point off Skip Lane, and details of the northern access point, including levels and gradients. In the absence of this information, it is likely that the proposals would lead to conditions detrimental to road safety and lead to traffic congestion contrary to Policy AM7 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

2 R17 Ecological Importance

The submitted plans and documentation, including the submitted ecological assessment, has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area, including the adjacent Nature Conservation Sites of Metropolitan or Borough Grade I and II Importance, within which there are designated Nature Reserves and a Site of Special Scientific Interest (Frays Farm Meadows). The proposal is therefore contrary to Policies EC1 and EC3 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and policy 3D.14 of the London Plan and the provisions of PPS9 (Biodiversity and Geological Conservation).

3 NON2 Non Standard reason for refusal

The submitted plans and documentation do not clearly illustrate the route of the proposed northern haul road or provide details of the proposed access at the northern boundary of the Golf Course or provide sufficient information regarding the impact of these works on existing vegetation, including trees and woodland. The proposal is therefore contrary to Policies BE26 and BE38 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

4 NON2 Non Standard reason for refusal

The applicant has failed to provide contributions towards the improvements to facilities as a consequence of demands created by the proposed development (in respect of a contribution towards the management and maintenance of the adjacent Nature Reserves and improvements to the public footpath (boardwalks)). The scheme therefore conflicts with Policy R17 of the Hillingdon Unitary Development Plan Saved Policies September 2007, and the adopted Supplementary Planning Document 'Planning Obligations.'

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 153 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (February 2008) and national guidance.

AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EC5	Retention of ecological features and creation of new habitats
LPP 4B.1	London Plan Policy 4B.1 - Design principles for a compact city.
LPP 4A.3	London Plan Policy 4A.3 - Sustainable Design and Construction.
MIN20	Proposals involving landfilling, re-working or disturbance of old landfill sites - gas control and monitoring requirements
MIN21	Impact of development proposals involving landfilling on the local hydrogeological regime - requirement for monitoring and mitigation measures
OE1	Protection of the character and amenities of surrounding properties and the local area
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements
OL5	Development proposals adjacent to the Green Belt
OL26	Protection and enhancement of trees, woodland and landscape features
OL9	Areas of Environmental Opportunity - condition and use of open land
POBS	Planning Obligations Supplementary Planning Document, July 2008
PPG2	Green Belts
PPG24	Noise
PPS1	Delivering Sustainable Development
PPS13	Transport
PPS25	Development & Flood Risk
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
R4	Proposals that would involve the loss of recreational open space
R5	Proposals that involve the loss of sports, leisure, community, religious, cultural or entertainment facilities

3. CONSIDERATIONS

3.1 Site and Locality

Uxbridge Golf Course is located on approximately 92.5 acres (37.5 hectares) of land to the north of the A40 Western Avenue and to the west of Ickenham. The planning application area encompasses 59 acres (23.9 hectares) of the golf course, which is situated entirely within the Green Belt.

The course occupies land on a north-south axis, which slopes downhill from the east to the west at an average slope about 1 in 15. There is a smaller narrow section of the site to the south which falls to the west, but more steeply by about 20m at a slope of approximately 1 in 6. The eastern ridge also slopes approximately 62.0 metres AOD in the north to 52.0 metres AOD in the south, while the western boundary slopes downwards from approximately 34.0 metres AOD in the north and 32.0 metres AOD in the south.

Within the site there are smaller scale changes of topography associated with the golf course. Along with the golf features (greens, tees, bunkers etc) the majority of the site consists of tightly mown grassland for the golf course, interspersed with occasional woodland blocks and linear Poplar planting, particularly at the northern end of the course. Individual mature Oaks or small groups of mature Oaks are also in evidence.

The northern part of the course is very linear and regular in form as a result of the straight, open drainage channels that run parallel to and across fairways, and the lines of non-native Poplars. The areas between these fairways lack any under-storey vegetation and contrast somewhat with the old oak trees that mark the alignment of former hedgerows.

At present six of the eighteen holes are closed because of major pipeline works across the southern section of the course.

There are no ponds or lake features on the site. The ditches to the West of the site are running with water much of the year. Beyond the site to the west, the landscape is very much associated with damp waterlogged wetland (both in the open fields and woodland). The proposed development lies outside the flood plain of the River Colne to the west, as designated by the Environment Agency Map.

There is a public footpath which crosses the site from East to West at the Northern end of the site.

The boundaries of the course consist of more mature woodland (mainly to the West and central zone), hedgerow and open fields (mainly to the East and South West), although the boundary to the south east of the site is occupied by residential properties in The Drive. The A40 runs along the southern boundary of the site.

The west boundary meets the floodplain of the Colne Valley and the River Frays, with the Grand Union Canal lying further to the west. The floodplain is characterised by reservoirs (flooded gravel pits) to the north-west and woodland/scrub with areas of semi-natural grassland and wetlands in the south-west. There is a waste management site on elevated land on the northern boundary which is part-screened by a wooded slope.

The floodplain to the west is a Nature Conservation Site of Metropolitan or Borough Grade I Importance, within which there are designated Nature Reserves and a Site of Special

Scientific Interest (Frays Farm Meadows). Approximately half way up the eastern boundary there is a Nature Conservation Site of Borough Grade II or Local Importance.

3.2 Proposed Scheme

Planning permission is sought for the remodelling and overhaul of the course. The applicants have submitted that the works are required in order to produce a golf course that will be much improved, challenging and a well maintained public amenity for the Borough, resulting in a course of choice for all standards of golfers and will address the issues of drainage, course quality and environment, safety and course routing.

The key elements of the proposals are:

- The importation of 375,665 cubic metres of clean, inert construction material and soil for landscaping and re-contouring purposes. All sub-soils for the remodelling of the course will be imported to the site. Imported soils will consist of excavated, uncontaminated earth spoils and soils.

The applicants submit that the volume of fill material required is necessary for the development proposed and constitutes a waste recovery operation. A summary of the volumes associated with main development needs are provided below:

Development Need	Volume of Fill (cu m)
Reinstatement Works	74,015
Drainage issues and co-ordinating/tie in adjacent holes	188,016
Environmental (Human Health / noise and grass quality)	113,625
TOTAL	375, 656

The existing topsoil will be stockpiled on site, improved and reintroduced on completion of the sub-soil ground modelling. It is intended to have a minimum of 150mm of topsoil on the fairways, green surrounds, tee banks, semi roughs and shrub planting zones. A maximum of 50mm will be present in the out of play grassland/wildflower zones. Additional importation of specialist root zone materials will be required for the fine turf areas, namely golf greens. Similarly, a proportion of gravels will be imported for use with any subsurface pipe drainage network that is proposed.

- Laying out of the golf course including construction of tees, greens, bunkers etc.;

It is proposed that the northern section of the course is re-routed to provide more exciting golf holes and to remove the confused and tedious layout of the holes in this section of the course. One hole is removed from this area, to create a less constricted arrangement, and replaced by a new short hole in the central area, where more space is available.

The realignment of holes in this area will necessitate the removal of many of the poplars. A strategy of new planting is proposed, to introduce more appropriate native species and to ensure that priority is given to habitat connectivity across the site. None of the mature Oaks are proposed to be removed.

In addition, further remodelling is proposed on the holes in the southern section of the course so that they are of the same style and quality to those on the remainder of the

course on completion of the project. The applicants submit that the remodelling proposals are fundamental in addressing the realignment of holes 8 and 9 (proposed layout) and of key importance in the overall strategy to upgrade and refresh the entire facility.

There are no new buildings, roads, parking and paths proposed as part of this design, apart from the temporary construction haul routes and the existing temporary construction access. Buggy paths will not be installed along fairways but localised to tees and greens where necessary to ensure the buggies remain to designated areas that are made safe for access and egress.

· Site Access and Haul Routes

The proposal will involve the creation of a new temporary site access, off Skip Lane to be used to access the northern section of the course. A short 8m wide cutting would be required on the northern boundary, which would also involve the removal of existing vegetation. The existing access on the A40 slip road up to Swakeleys roundabout (until recently employed by National Grid construction traffic) will be used for the works in the southern section of the course. The haul road will follow the route of the existing Gas Pipeline site haul road and golf course maintenance route through the western side of the central woodland block, with tree protection measures as required, to reach the main body of the golf course.

The proposal also involves landscaping works, including seeding and planting the course, engineering of a course drainage and irrigation system and habitat enhancement, particularly in the buffer areas adjacent to nature conservation features.

Phasing

The works will be split into three principle phases: south, central and north. The northern and central sections of the current layout can remain open for play whilst the southern section is remodelled, then the northern part of the course can remain in play whilst the central area is shaped. It is intended to keep 9 holes playable all the time, depending on the phasing of growing in periods.

The first phase will be the reinstatement of the course at the southern end, affecting proposed holes 8 through to 12. The second phase will commence on holes 6, 7, 13, 14 and finally 10. This is to allow the drainage and irrigation to be automated, allowing this half of the course to be established, watered, fed and playable before this element of the course is handed over to the golf club members, together with hole 5 in its present condition, making it a ten hole course. The third and final stage will involve the establishment of a new access and egress point from the northerly point of the course via the existing Hanson building yard. The remaining holes will be remodelled with the last hole being the proposed 5th.

Deliveries via the proposed access points are proposed to take place between 7.30 am and 4.30 pm. Based on a volume of proposed soil importation of 375,655 cubic metres and the estimated frequency of lorry movements it is anticipated that the duration of lorry movements will be 88 weeks. This would split as 180,721 cubic metres for the Southern Phase (1 & 2), using the A40 Southern Section access for approximately 36 weeks at 100 loads per day with the remainder being for the Northern Phase (3), using the Skip Lane Access for approximately 52 weeks at 75 loads per day.

Due to the intention to keep at least 9 holes open at all times there will be a break between the Northern and Southern sections of work to enable the grow-in period.

The application is supported by a number of reports that assess the impact of the proposal. A summary and some key conclusions from these reports are provided below:

Project Description

This document includes a description of the site, an explanation of the rationale behind the proposed upgrade of the facilities, details of the proposed remodelling work, landscape design and construction details. Also included are appendices outlining issues surrounding the use of imported soils in the remodelling of golf courses (appendix 1), biodiversity enhancements resulting from the development (appendix 2) and a company profile for the applicants, (appendix 3).

Impact Statement (Version 2)

The Impact Statement report describes the effects on the land and considers that, while the course will have a more undulating landform, the basic topographical landform, sloping from east to west, will remain.

Visual Appraisal

The report describes the proposed re-modelling and considers the visual effects from 17 viewpoints around the site.

Flood Risk Assessment

The report concludes that the flood risk to the site and surrounding area will not be increased by the development. The proposed development is therefore in accordance with PPS 25.

Ecological Impact Assessment Nov. 09

The report suggests that these will be subtle changes and not impact on the SSSI interest features. The report also states that there is scope for designing in buffering areas and incorporating sediment management measures.

Arboricultural Implications Assessment

The report's objectives are to inspect significant trees on and close by to the site and to provide advice on the successful retention and incorporation of trees of amenity value. Root protection zones are specified and indicative tree protection measures provided. The implications assessment is detailed in section 4 and temporary tree protection measures are described in section 5. The report concludes (section 6) that tree surgery and selected removal should take place prior to the erection of the protective fencing and prior to the commencement of development.

Traffic Assessment Dec. 09

The Assessment identifies the need for a temporary construction access to the north of the site for soil importation from Harvil Road through Skip Lane. The Assessment assesses safety concerns at the Skip Lane access, more specifically, sightlines from Skip Lane looking to the north along Harvil Road for visibility of southbound vehicles. To assess this concern traffic surveys have been carried out on Harvil Road. The report concludes that the recommended sight lines at the junction of Harvil Road and Skip Lane are achievable within highway land and without crossing third party land and is therefore recommended that this is a suitable access for use by construction traffic.

Design and Access Statement v2 Nov. 09

This document details the steps taken to arrive at the proposed design, showing the consideration given to the site context, the consultation processes used and the key design parameters determined as a result of this process.

Construction Environmental Management Plan (CEMP)

This document details the processes and controls that will be used to manage the construction activities and the sequence and timing of operations. Contractors will be required to adhere to the CEMP at all times with regard to health and safety, the control of surface water runoff, the control of nuisance caused by dust or dirt and the application of procedures to ensure that only approved material is deposited on site, to the satisfaction of the LPA and the Environment Agency.

Pre-Construction Outline Method Statement

This document adds further detail regarding the construction process, in order to demonstrate that it will be efficiently and effectively managed to avoid adverse environmental impact

Potential Impact on Mature Oak Trees

The report highlights the issues involved regarding the impact of the build up in levels on the existing mature Oaks. The report covers the existing hydrological conditions, the potential for the water table and soil moisture conditions to change, the likely impact this may have on the trees and measures that can be undertaken to identify and combat at an early stage any stress affecting particular trees.

Main changes to the previous scheme:

The design has been changed from the previous scheme which was withdrawn in September 2009, so that the volume to be filled has been reduced from 581,000 cubic metres to 375,665 cubic metres.

The levels have been adjusted with a view to addressing concerns that the proposed landform of the previous application was excessive in its build up, with some extreme high points and steep gradients. The reduction in the importation volume was also reviewed to take account of the impact on the length and intensity of the construction process, thereby reducing the impact along Harvil Road.

The application red-line boundary has been revised to reflect the reduction in the overall application area, from 28 hectares to 23.9 hectares, but with the inclusion of small additional areas, to reflect the need for construction access over adjoining land to the north and south of the site.

Proposed levels and slope angles have been reduced generally, but the area affected by soil importation has also been reduced, principally to leave the higher parts of the course unchanged.

There is now no proposal to remodel any of the 8th or 18th fairways or the bulk of the 1st and 7th holes and there will be no importation to the 6th hole to the south of the public footpath.

Discounting the holes that would have required reinstatement works in any case, (as a result of the new pipeline), only the holes that have major drainage issues and the poorest holes on the existing course in terms of layout and general environment i.e. those at the northern end of the site will now be subject to major works.

Whilst the upper holes will not now be remodelled, their greens and tees will still be upgraded to provide better quality surfaces, in keeping with the new golf holes.

Additional plans have been included in this application to further clarify the extent of the proposed earthworks.

An Elevations Changes plan (500.11 Rev A) shows a colour coded plan of the relative heights of the proposed earthworks across the course.

A Steeper Gradients Plan (500.12 Rev B) indicates where proposed slopes in golfing areas exceed 1 in 4.

The landscape plan (500.03 Rev A) has been amended to include final contour levels so that the proposed planting can be assessed in relation to the final ground form. The plan has also been amended to reflect that there are groups of trees that are no longer being removed following alterations to the grading detail.

The Tree Impact Plan (500.14) also indicates the reduced requirement for clearance.

The Contractors Works Plan (500.08 Rev B) has been amended to reflect the grading changes.

The Existing Site Plan (500.01 Rev A) has been amended to show the correct hole numbering and any incorrect plans or references within the application documents revised accordingly.

3.3 Relevant Planning History

4601/APP/2009/1487 Uxbridge Golf Course The Drive Ickenham

Remodelling works to Golf Course, consisting of re-contouring of existing land form using imported inert soils, together with extensive landscaping and associated drainage.

Decision: 08-09-2009 Withdrawn

Comment on Relevant Planning History

A planning application was submitted on 9 July 2009 (Ref:4601/APP/2009/1487) for remodelling works to the Golf Course, consisting of re-contouring of the existing land form using imported inert soils, together with extensive landscaping and associated drainage.

The key elements of the proposal are detailed below.

* Importation of approximately 580,000m³ of inert material

* Construction access from two points: using the A40 slip road to Swakeleys Roundabout for the southern portion of the golf course and Skip Lane (off Harvil Road) for the central and northern portions of the site.

* The northern and central portions of the course would remain open for play whilst the southern section is remodelled. It is intended to keep at least 9 holes payable at any one time.

* The duration of the works would be largely dependent on the availability of clean inert soils. It is estimated that this would be between 100-120 weeks. 22 Weeks for the southern section (phase 1) and 98 weeks for the northern sections (phases 2 and 3).

148 individual letters of objection and 6 petitions, bearing 12, 21, 97, 100, 130 and 184 signatures were received objecting to the planning application. In addition, objections were received from Ickenham Residents Association, and The Drive Residents Association. The principle areas of concern were:

* The volume of in-fill is excessive

* Inadequate measures to monitor the volume of infill and controls of excessive dumping

* Inadequate consultation with local residents

* Impact on local residents from a potential 9800 HGV movements on local roads over a period of 100 weeks.

* The application is for commercial gain

* Impact on the Green belt

- * Impact on local ecology, and Nature Reserves
- * Disruption to golf course

The application was withdrawn on 8 September 2009.

GAS PIPELINE REINSTATEMENT

National Grid recently installed an 18.5km long, 1220mm diameter, high pressure pipeline to transport natural gas from a new Above Ground Installation (AGI) near the existing AGI in Harefield to an existing AGI at Southall. Part of the route of the pipeline passes under the southern section of Uxbridge Golf Course.

Murphy Pipelines Limited (MPL) were appointed by National Grid to design and build the new pipeline, which has already been substantially laid and land reinstatement has been partially completed. National Grid has entered into an arrangement whereby the applicants Mac Trading will carry out the final phase of the land reinstatement, due to the specialist nature of the drainage works required for the golf course. The final phase of land reinstatement has not been carried out to date.

The pipeline was due to be commissioned in September 2009, after which various restrictions would come into force, in terms of works that can be carried out in the proximity of the pipeline. However, it is understood that the commissioning of the pipeline has been delayed.

The construction of pipelines such as this are Permitted Development and do not require planning permission, by virtue of Schedule 17 Class F (Gas Suppliers), of the Town and Country Planning (General Permitted Development) Order 1995.

The applicants separately approached the Council on behalf of National Grid to complete the reinstatement works to the specific holes affected by the Gas Pipeline. It was considered by officers that the proposed reinstatement work went further than simply land restoration to its original form, as the applicants were also seeking to improve playability of various holes, providing flatter landing zones in key locations. The reinstatement sought to redress an existing problem with the steepness of the 10th and 11th fairways, by reducing the cross falls. It was therefore considered that these works as submitted, could not be carried out under permitted development, but rather, would require the submission of a planning application.

The design and specification for the land restoration also included works to the slope of the fairway of the existing 10th hole (east of the pipeline). The applicants submitted that as a result of the gas pipeline works, significant land slippage had occurred. This is blamed in part on the severing of existing drainage, which has been effectively been made redundant. It was argued that in order to ensure that there is no future land slippage and for health and safety reasons, this area would need to be reinstated.

Although plans were tabled, these indicated level changes and were not accompanied by sufficient information to be considered further. The applicant has not prepared detailed information to enable further discussion of a permitted development operation.

4. Planning Policies and Standards

Additional Policies and Standards:

London Plan Policies: 3D.9 - Green Belt; 3D.14 - Biodiversity and nature conservation;

4B.1, 4B.2 - Urban Design and Access

The Mayor's Biodiversity Strategy.

Municipal Waste Management Strategy; Accessible London: Achieving an inclusive Environment SPG

Planning and Access for Disabled People -A good Practice Guide (ODPM)

The Mayor's Transport Strategy

UDP / LDF Designation and London Plan

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.1 To maintain the Green Belt for uses which preserve or enhance the open nature of the area.
- PT1.12 To avoid any unacceptable risk of flooding to new development in areas already liable to flood, or increased severity of flooding elsewhere.
- PT1.3 To seek greater public access to the countryside for informal leisure activities.
- PT1.39 To seek where appropriate planning obligations to achieve benefits to the community related to the scale and type of development proposed.
- PT1.5 To carry out and promote countryside management projects to improve the environment and nature conservation value of countryside and open land, particularly in areas which are degraded or derelict and important corridors along roads and watercourses.
- PT1.6 To safeguard the nature conservation value of Sites of Special Scientific Interest, Sites of Metropolitan Importance for Nature Conservation, designated local nature reserves or other nature reserves, or sites proposed by English Nature or the Local Authority for such designations.

Part 2 Policies:

- AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
- AM7 Consideration of traffic generated by proposed developments.
- BE38 Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
- EC1 Protection of sites of special scientific interest, nature conservation importance and nature reserves
- EC2 Nature conservation considerations and ecological assessments
- EC3 Potential effects of development on sites of nature conservation importance
- EC5 Retention of ecological features and creation of new habitats
- LPP 4B.1 London Plan Policy 4B.1 - Design principles for a compact city.
- LPP 4A.3 London Plan Policy 4A.3 - Sustainable Design and Construction.
- MIN20 Proposals involving landfilling, re-working or disturbance of old landfill sites - gas control and monitoring requirements
- MIN21 Impact of development proposals involving landfilling on the local hydrogeological regime - requirement for monitoring and mitigation measures

OE1	Protection of the character and amenities of surrounding properties and the local area
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
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OL1	Green Belt - acceptable open land uses and restrictions on new development
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R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
R4	Proposals that would involve the loss of recreational open space
R5	Proposals that involve the loss of sports, leisure, community, religious, cultural or entertainment facilities

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **12th January 2010**

5.2 Site Notice Expiry Date:- **8th January 2010**

6. Consultations

External Consultees

The Notice of Proposed Development was advertised as major development under Article 8 of the Town and Country Planning (General Development Procedure) Order 1995 and 172 neighbours and local amenity groups were consulted in the surrounding area. Site Notices were posted at the entrance to the Golf Course.

67 individual letters of objection (25 letters and 42 internet responses) and 6 petitions, (4 bearing 20 signatures, with a further two bearing 24 and 55 signatures) were received objecting to the planning application. In addition, objections were received from Ickenham Residents' Association, North Uxbridge Residents' Association, The Association of Residents' of The Drive (North) and The Drive Residents' Association. The principle areas of concern are:

1. The volume of in-fill is excessive
2. Dumping 375,000m³ of landfill is unjustified by legitimate need and offers no benefit to the community

3. No objection to a reasonable use of landfill for reinstatement of the southern holes or to improve drainage at the lower levels of the course
4. Underestimation of the number of loads required to deliver the packed volume of landfill by using a volume of 10m³ per truckload instead of the industry standard of 9m³
5. Inadequate measures to monitor the volume of infill and controls of excessive dumping
6. Inadequate consultation with local residents
7. Impact on local residents from a potential 98000 HGV movements on local roads over a period of 100 weeks.
8. Expose the residents of Harvil Road and Swakeleys Road to months of noise, inconvenience and risk of damage to property
9. The application is for commercial gain
10. The overriding motive appears to be profit at the expense of the local community
11. Impact on the Green Belt
12. The current golf course uses the natural contours of the land to create a challenging yet playable course entirely in sympathy with its natural surroundings
13. The proposals would change the character of the landscape forever
14. Impact on local ecology, and Nature Reserves
15. Disruption to golf course
16. Concern over the removal of so many mature trees
17. Residents and golfers would have to tolerate an industrial moonscape and a visual monstrosity during the construction period.
18. Insufficient detail of this important proposal has been made public
19. Council to ensure ratepayers' interests are protected.
20. Public rights of way should be protected
21. Any temporary closure of public rights of way should only be for the duration of the project.
22. The definition of "inert soils" be clarified
23. Storage of top soil should not impact on visual quality of the Green belt
24. Insufficient regard has been given to nature safeguards
25. Concerns about retaining access to the course for the members of Harefield Place Golf Club
26. The Golf Course will be out of use for an extended period of time.
27. Measures should be put in place to ensure that the landscaping is completed within 2 years
28. 9 holes should remain playable at all times
29. Proof that applicant can complete the project
30. The design of the course will make it dangerous for players.
31. The proposals do not improve the golf course

GREATER LONDON AUTHORITY (GLA)

The Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph 38 of the above-mentioned report; but that the possible remedies set out in paragraph 40 of this report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

THE GLA REPORT (SUMMARY)

London Plan policies on urban design, access, biodiversity, sustainable development, transport and parking are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

Green Belt: The proposal is an appropriate use in the Green belt and complies with London Plan Policy 3D.9

Waste Management: A site waste Management Plan must be submitted and should be conditioned.

Biodiversity: The proposed biodiversity Management and Monitoring Plan is welcomed and supported, but it should be secured. Further information is required on new trees that are proposed to be introduced.

Urban Design and Access: Whilst remodelling and improvement to the Golf Course is supported, the details of the landscaping and layout need extensive consultation with relevant organisations and their concerns addressed.

Transport and Parking: Suitable arrangements should be agreed with TfL for the southern access road off the A40 during construction and a construction Logistics plan should be secured by planning obligation to help mitigate the impact of construction on the Transport for London Road network.

While the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies and could possibly lead to the application becoming compliant with the London Plan:

Waste Management: A site Waste Management Plan must be submitted and should be conditioned.

Biodiversity: Secure the proposed biodiversity Management and Monitoring Plan. Provide further information on new trees.

Urban Design and Access: Engage in extensive consultation with relevant organisations and address their concerns.

Transport and Parking: Consult TfL on the southern access road off the A40 and submit a construction Logistics Plan that should be secured.

TRANSPORT FOR LONDON (TfL)

You will have recently received comments on the above application from Transport for London (TfL) through the Mayors Stage 1 report dated 20th January 2010.

I am writing to let you know that since the report TfL officers have been on a site visit with the applicant and confirmed that they are satisfied with the proposed construction access off the A40 slip road.

Therefore providing that a Construction Logistics Plan, to be agreed by both TfL and LB Hillingdon prior to commencement of works, is secured by planning condition, TfL has no remaining issues with this application.

ENVIRONMENT AGENCY

The proposed development will only be acceptable if the following conditions are attached to any planning permission granted.

1. The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) Final Report K0148 (Rev 1) and the following mitigation measures detailed within the FRA:

Limiting the surface water run-off generated by the 1 in 100year critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.

Reason

To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.

2. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with.

Reason: To protect the aquifer under the site.

Advice to applicant

The proposed development lies within 250 metres from the land off Harvil Road, a former landfill site that accepted construction waste material and there may be potential for landfill gas to be generated. Developers may be required to carry out a comprehensive risk assessment due to the risks the former landfill site poses. The local authority's Environmental Health and Building Control departments would wish to ensure that any threats from landfill gas have been adequately addressed in the proposed development. This may include building construction techniques that minimise the possibility of landfill gas entering any enclosed structures on the site to be incorporated into the development.

If any waste is to be used on site, the applicant will be required to obtain the appropriate exemption or authorisation from us. We are unable to specify what exactly would be required if anything, due to the limited amount of information provided. If the applicant wishes more specific advice they will need to contact the Environment Agency helpline at 08708506506 or look at available guidance on our website <http://www.environment-agency.gov.uk/subjects/waste>.

In England, it is a legal requirement to have a site waste management plan (SWMP) for all new construction projects worth more than £300,000. The level of detail that your SWMP should contain depends on the estimated build cost, excluding VAT. You must still comply with the duty of care for waste. Because you will need to record all waste movements in one document, having a SWMP will help you to ensure you comply with the duty of care. Further information can be found at <http://www.netregs-swmp.co.uk>

SPORT ENGLAND

The development proposal will not result in any negative impacts on sports facilities in the site and therefore, we have no objections to the proposed development and make no request for conditions to be attached to any permission.

NETWORK RAIL

Network Rail has no objection in principle to the development, however due to its close proximity to the operational railway; we would request that the following points below are taken into account if granting the application.

Based on the information provided it seems the proposed works comprise of local landscaping in the golf course and it is not going to come too close to Network Rail assets. From the information provided the waste management is to the north of the course providing enough clearance between the track and the golf course. Providing that the boundaries of the golf course would not change we do not have any major objections.

Please note that as usual any major changes in ground water regime need to be consulted and approved by Network Rail as they can affect the track sub-structure and capacity of our drains. Therefore the developer should contact AssetProtectionLNWSouth@networkrail.co.uk

Please also note that Network Rail's normal condition issued to developer regarding drainage is as

follows: No water or effluent should be discharged from the site or operations on the site into the railway undertaker's culverts or drains, without Network Rail approval. Soakaways should not discharge towards and/or within 10m of railway infrastructure. Details of the proposed drainage must be submitted to, and approved by the local planning authority; acting in consultation with the railway undertaker and the works shall be carried out in accordance with the approved details. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants expense.

The developer should also take into account the following when constructing and maintaining the scheme:

- Fail safe use of crane and plant
- Scaffolding
- Excavations/earthworks
- Security of mutual boundary
- Fencing
- Method statements/fail safe/possessions
- Two metre boundary
- Lighting
- Access to railway
- Trees/shrubs/landscaping

Network Rail is required to recover all reasonable costs associated with facilitating these works

NATURAL ENGLAND

The development site lies directly adjacent to the Frays Farm Meadows Site of Special Scientific Interest (SSSI) and close to the Denham Lock Wood SSSI. Both of these sites are also part of the Mid Colne Valley Site of Metropolitan Importance (Met Site), which is a section of the Colne Valley with a diverse range of high quality habitats. Natural England has a number of concerns in relation to the proposals, particularly in relation to the potential impacts on the hydrological systems of the Colne Valley. Due to a lack of information in relation to the potential impacts, particularly in reference to the Frays SSSI, Natural England object to this application.

I draw your attention to your duty, under S28G of the Wildlife and Countryside Act 1981, as incorporated by the Countryside and Rights of Way Act 2000, to take reasonable steps, consistent with the proper exercise of your functions, to further the conservation and enhancement of the SSSI. In this instance, the London Borough of Hillingdon is both the local planning authority and the site owner and has S28G duties in both of these roles.

I also draw your attention to the provisions of S28I of the 1981 Act, in particular to the requirement that, should permission be given contrary to Natural England's advice or to the conditions which Natural England recommends should be attached to the permission, then you must ensure that:

- notification is given to Natural England of the date and terms of the permission and how, if at all, you have taken account of Natural England's advice.
- the permission does not permit operations to begin before 21 days after details of the permission and a statement of how you have taken account of Natural England's advice, has been given to Natural England.

Ecological Impact Assessment (EclA)

The EclA states that there are a number of potential effects of the proposal on the Frays Farm Meadows SSSI during construction and operational phases. The most significant of these are:

- Construction:
- Pollution/sediment

- opportunity for the erosion of soil and its down slope transport into the SSSI, which could lead to dieback of vegetation and localised reduction in water column oxygen content and implications for aquatic invertebrates

Hydrology

- slight increase to the rate which runoff (via stream flow) enters the SSSI
- all runoff/drainage from the site will be directed to the SSSI

Operation:

Pollution/sediment

- the likelihood of potential pollution events is not predicted to increase

Hydrology

- the overall effect of the scheme will be to drain the course more rapidly than currently
- all of this water will be directed into the SSSI; entering at the same point as currently occurs

The EclA suggests that these will be subtle changes and not impact on the SSSI interest features. The report also states that there is scope for designing in buffering areas and incorporating sediment management measures. However, there is no information available regarding the quantities of water that would be entering the SSSI or whether the quantity/quality of water that currently enters the site is appropriate to the special interest of the site. As stated above, the London Borough of Hillingdon have a duty to conserve and enhance the SSSI and as such we would expect to see site enhancements, for example by improving (rather than not increasing) levels of runoff and pollution. Without more information on optimum hydrological conditions for the SSSI it is difficult to assess the levels of impact. The report states that there is scope to discuss these options with both Natural England and the London Wildlife Trust, but it does not form part of this application package. Overall, there is a lack of detail on potential impacts which we would expect to see at this stage.

The EclA also states that final analysis of impacts will be completed in a Construction Environmental Management Plan (CEMP) and Biodiversity Management and Monitoring Plan (BMaMP), however these have not yet been produced (NB a partial CEMP has been provided to address some issues but it does not include full details of biodiversity issues). I was informed by you in an e-mail of 5 January 2010 that a further CEMP will be produced to set out how potential effects on the SSSI from construction activities will be avoided/minimised and a BMaMP Plan will be implemented ensuring the protection of the adjacent SSSI. However, without this information at this stage it is not possible to ascertain the full level of potential impacts on the SSSI and therefore Natural England object to this application.

The (partial) CEMP states that materials that will be imported to the site will be inert soils that meet quality standards agreed with the Environment Agency. However, there is a lack of information on the potential impacts of the materials on the SSSI. The Diffuse Pollution Technical Note states that maintenance of sediment control measures will prevent sediment-related diffuse runoff and transport of sediment into the SSSI. This Note does not contain sufficient information to support this statement and there is no mention of what quantities of sediment currently enter the SSSI and how this would be impacted by the proposals. Natural England would also expect to receive further assurance regarding the potential for any contaminated materials or sediments to enter the SSSI or any water course connected to it.

Species issues

The Ecological Impact Assessment raises issues of protected species, including bats and water voles. As with the SSSI issues, it is suggested that a BMaMP and CEMP will be produced to address any potential issues in related to protected species. Protected species are a material consideration in planning decisions and the extent of impacts should be established prior to permission being granted: Paragraph 98 of ODPM Circular 06/2005[1] states that "The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its

habitat." Paragraph 99 also states that "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted otherwise all relevant material considerations may not have been addressed in making the decision. As the BMaMP and CEMP have not been finalised and the extent of impacts on protected species have not been fully addressed, Natural England object to this application on the grounds of insufficient information.

Access to Frays Farm Meadows SSSI

I could not find reference within the application to the existing access route to the Frays SSSI that is used by the London Wildlife Trust (LWT) who lease the site. To reiterate, as owner of the SSSI and a public body, the London Borough of Hillingdon have duties to ensure the SSSI is conserved and enhanced. As part of fulfilling these duties, Natural England would expect any proposals to ensure that this access route is retained in order that LWT can enhance the condition of the SSSI. This would also support previous discussions between Hillingdon's Green Spaces, LWT and Natural England.

Additional issues

There are potential concerns regarding the use of fertilisers and chemicals on the golf course, particularly as the EclA states that all runoff will be directed onto the SSSI. Section 3.19 of the Project Description states that the bulk of fertilisers will be slow-release and leaching is low risk, however this is not quantified and the overall impacts are not clear. Section 3.21.9 of the Project Description states that water will be applied most evenings during periods without rain. It does not state where this water would be sourced from and Natural England would expect to receive assurance that this would not affect the water table or hydrology of the surrounding sites, including the SSSI.

Natural England support the proposed habitat enhancement and creation measures within the golf course site and there are also positive aspects to the native planting schemes and species projects. Natural England would like to reiterate that we object to this application on the grounds of insufficient information on potential impacts to the hydrological functioning and habitats of the Frays Farm Meadows SSSI.

LONDON WILDLIFE TRUST

London Wildlife Trust has been alerted of the application for the extensive remodelling of Uxbridge Golf Course, consisting of reshaping works using imported inert soils and extensive landscaping to enhance visual and ecological amenity. It is in our capacities as the managers of adjacent nature reserves to the application site that we wish to express our concern over a number of issues relating to the proposed development. In combination, these lead us to object to the current planning application.

The proposed development is adjacent to two nature reserves managed by London Wildlife Trust (LWT) on behalf of LB Hillingdon: Frays Farm Meadows and Denham Lock Wood both designated as Sites of Special Scientific Interest (SSSI). We have been actively involved in the protection and management of these areas since their designation as nature reserves, as well as being concerned for the wildlife and natural habitats of the wider area. These reserves play an important role within the broader landscape of the Colne Valley and contribute to the regions biodiversity. In addition to our direct management of these sites, LWT is currently engaged on a Water Vole Project within the Colne and Frays Valleys which extends beyond the two reserves themselves.

In the first instance, we are alarmed by the lack of contact and information that we have received from the applicants. Whilst it is true that we were approached by their ecological consultants to comment upon restoration proposals for sections of the golf course, we were led to believe that these proposals related to the need to rectify the disturbance derived from the recent major gas pipeline works.

It is important to point out here that NERC Act 2006 gives Local Planning Authorities (LPA) a Duty to have regard to the conservation of biodiversity in exercising their functions. This includes restoring and enhancing species populations and habitats, as well as protecting them. Under Section 41 of NERC the list of habitats and species considered to be of principle importance for the purpose of biodiversity conservation includes lowland meadows and rivers, as well as water vole, all relevant to the application site.

The relevant policies within the Council's UDP are EC1, EC3, EC5, OL1 and OL2; others will also be pertinent. Many ecological aspects of the proposals are covered quite thoroughly in the applications supporting documents. Indeed, there is the potential for aspects of these to contribute significantly to the biodiversity of the area where they relate to the restoration of the areas affected by the gas pipeline. However, we are concerned by the current planning application for a number of reasons and have some major areas of concern. These key areas of are set out below.

1. Water voles

The Ecological Impact Assessment (EclA) identifies the presence of water voles in the ditch adjacent to the western edge of the proposed works, close to the existing footpath and track. We have been aware for some time of the importance this ditch in what is a highly significant local population of this endangered mammal. Whilst in their final state the proposed works may not have a significant impact (as long as there are no new water quality issues), and the designation of the adjacent area as wet grassland will be of benefit, we have serious concerns about the potential impact during construction.

A high bank is proposed immediately to the east (and a new pond adjacent to the ditch on the west side). The future of the existing track is not apparent from the plans, and if this barrier is lost there must be a serious risk of potentially disastrous encroachment.

Our overall concern regarding the important population of water voles on our SSSI's relate to the potential effects of construction and operation works on the delicate habitat requirements of this species. The Trust's past experience suggests that the reality of a contractors approach can be rather different from that promised. Only a brief departure from careful working/best practice is needed to inflict potentially significant damage. In this respect, we would need stronger reassurance and more specific detail on what steps the applicants propose to take. As such this application breaches UDP Policies EC1 and EC3.

Until specific and robust specifications are put in place to ensure protection and conservation of water vole populations in the vicinity, ratified by appropriately qualified ecologists and agreed by relevant partners (including LWT), this application must be rejected.

2. Management of access through Uxbridge Golf Course to Frays Farm Meadows SSSI.

The existing track (which also carries a short section of the public footpath) that leads from the Club House to the sections of the course that neighbour Frays Farm Meadows SSSI is of paramount importance to LWT, and our ability to effectively manage these nature reserves on behalf of Hillingdon Council. This track is our sole access point to the eastern meadows on this reserve.

To date, an informal and mutually beneficial access arrangement, reflecting the excellent history of relations between the Golf Club/course and ourselves, has meant that we have been able to effectively discharge our land management responsibilities on the SSSIs. The existing track has facilitated our annual programme of work to maintain the quality of SSSIs habitats. We are currently moving towards the implementation of a conservation grazing programme for the eastern meadows at Frays Farm Meadows SSSI, which will significantly improve their overall condition. Natural England has supported our work in this respect and are expecting the evolving arrangements with local graziers to be implemented so that the SSSI moves towards favourable

status. As we enter into agreements with local livestock farmers, the current access track is critical to ensure we can proceed as planned, and we intend to continue our use of this track to enhance the livestock security and conservation status of the reserve.

However, we note with significant alarm that the existing track it does not appear on the planning application plans. Again, we feel that the applicant's failure to contact the Trust as neighbouring land managers is revealed by the apparent removal of the access track from future plans. This will undermine our efforts to effectively manage these SSSIs, and therefore we object to this application.

In addition to the removal of the current track, the public footpath appears to have been diverted to a more westerly alignment in this area. Any proposed changes need to be clarified, particularly as the existing survey also appears to show the public footpath in the wrong location.

3. Hydrology; water levels

We are concerned about the impact of hydrological changes on the ditches adjacent to the nature reserves, especially where water voles could be present. However, we are also concerned about ditches and ground water levels where golf course run-off is taken through into the Frays Farm Meadows SSSI.

The pattern of water flow and retention throughout the golf course and the adjacent Local Nature Reserve is complex, and a high degree of confidence will be needed that there will not be unforeseen effects within the SSSI, where the ditches are a vital part of the ecological system which gives the SSSI its value. This needs to be discussed in considerably more detail than is contained within the current plans.

The lack of detail on the hydrological implications of the proposed development leads LWT is of significant concern, and as such breaches UDP Policies EC1 and EC3.

4. Water quality

In addition to our uncertainty over water level changes, LWT is concerned about ditch water quality where golf course run-off may find its way into Frays Farm Meadows SSSI. It may be beneficial to alter the ditch system associated with the works, such that golf course run-off is taken around the SSSI perimeter ditch rather than through the meadows. However, this also requires more detailed discussion and consideration.

The EclA identifies the need for care to be taken during the construction and operation phases of the proposed development. However, there is little information relating to the quantity and quality of water that will enter the SSSI. Consequently, since we cannot be sure at this stage what the likely impact of this development will be upon the SSSI status of our Reserves, this application must be rejected. As above, this in effect breaches UDP Policies EC1 and EC3.

5. Quantity and quality of landfill materials

Should this development be permitted, the amount of fill used must be carefully controlled to ensure that it does not result in the works encroaching further than approved or being more visually intrusive. Acceptable limits will need to be clearly agreed and marked on the ground to ensure that deviations do not occur by accident or stealth.

The inert nature and source of the soil needs to be carefully monitored, so that there are no changes in the chemical composition of soil or run-off and no introduction of invasive species which could negate any wildlife benefits which the proposals might otherwise bring. Our concerns here, in the absence of liaison by, or communication from, are based on the grounds of uncertainty.

We hope that the details outlined above assist in the decision; London Wildlife Trust recommends

that the application is refused. The Council is urged to fulfil its obligations under the NERC Act 2006. We are clear that at present there is not sufficient information to guarantee the protection and conservation of the biodiversity interests of the neighbouring sites, and as such is contrary to Policies EC1 and EC3. We are also very concerned that the proposals significantly affect us in our ability to manage two of the Council's SSSIs and that no prior contact has been made by the applicant to engage the Trust in developing its proposals.

HILLINGDON NATURAL HISTORY SOCIETY

As managers of the Harefield Place Nature Reserve which abuts the golf course, we are not objecting to the landscaping itself, but on the perceived consequences for the reserve, which is part of the Frays Valley Local Nature Reserve. There are a population of Water Voles on the ditches both through and adjoining the golf course. We are particularly concerned about the ditch that runs south, along the western edge of the course. This ditch is quite overgrown and must not be disturbed. We welcome the retention of the practice green near hole 14. Water Voles need unpolluted water and lush vegetation. Compaction and movement of materials threatens its habitat and territories. The reed beds in the adjoining lake are particularly important.

We are concerned about water flows into North Wood at holes 15 and 16. The wood has shallow ditches at this point. Any changes to the ratio of flows between these points and the most northerly drainage ditch will change the characteristics of the central portion of the wood.

Although part of the course is waterlogged some of the time, if this accumulated water is drained off quickly, instead of being stored and released slowly as at present, it is likely to cause flooding further downstream. This could have a serious impact on the water vole population in the ditch which could be flooded out.

What procedures will be put in place to ensure no minerals or alien plants and seeds are imported. There are already problems with Himalayan Balsam and Japanese Knotweed on the Reserve.

What procedures will be put in place to ensure that no more material will be imported than is specified in the planning application?

The use of fertilisers on the course and the increased drainage will affect soil quality in Denham Lock Wood SSSI. No nature reserve should have any fertiliser added as this changes the plant communities, encouraging species which thrive on nutrient rich soil. These vigorously compete with rarer plants which are an essential part of the reason the SSSI exists.

Considerable increase in vehicle movements brings unintended pollutants such as fuel and oil, which ultimately ends up in water courses, a complex series of ditches leading to the River Frays

ICKENHAM RESIDENTS' ASSOCIATION

We write to register our formal opposition to the above application and set out below what we consider are the planning grounds for refusal. In the absence of any formal amendments we respond solely in respect of the application as currently before the London Borough of Hillingdon (LBH). As a preliminary point, LBH should note the Government's current concern about the practice of using golf course re-modelling as an excuse for landfill and the likelihood that new planning legislation will be introduced shortly to curb such malpractice. Therefore any application considered in the interim should be subject to the most stringent examination and should be refused if in any doubt at all. Further, we accept that there is a need to address drainage problems on holes 14 and 15 and to reinstate the course following the recent works relating to the National Grid pipeline project. However, on information available so far, it appears that the current proposals go much further than is necessary to restore the course.

Effect on the Landscape

The golf course is situated within the green belt and on the boundary of the Colne Valley Park, recognised within the UDP at OL10. LBH has committed to support the aims of the Colne Valley Park to safeguard existing areas of countryside from inappropriate development and maintain and enhance the landscape. The proposed remodelling will dramatically alter the visual aspect of the course to visitors and residents, both temporarily during the works, and permanently following the remodelling. The current course has used the natural contours of the land to provide an undulating course with its terraces and mature trees. In the proposals it will be replaced by a surreal man made landscape made up of platforms with the retained trees sunk in deep troughs. It is therefore contrary to OL10 as it does not maintain or enhance the scenic value of the landscape in the long term, and in the short term, that is the duration of the project, it will degrade the scenic value even more drastically with the earthworks which cover almost the entire course. The project duration will be a minimum of 3 years 8 months according to the proposals which contain no contingencies for delays. As we have seen from other similar projects in the Borough, it is likely to take very much longer, especially given the dependency on a regular supply of inert soil. It is also contrary to policy OL7 which requires that golf course development should improve the landscape. (Note: Policy OL7 is a deleted policy). Furthermore, in the proposal, most of the mature trees on the course will be felled, and it is therefore contrary to OL26 of the UDP, which encourages the protection of trees and the retention of existing landscaping.

Loss and Degradation of Amenity

The Golf Club are analysing the plans for the remodelled course in detail and will be responding separately but have already identified the following concerns:

- There are safety issues relating to the position of the new holes in relation to each other and the neighbouring industrial estate.
- The heaping of the landfill will create steep banks which will also create safety issues and difficulties in playing certain holes.
- The number of short par 3 holes will increase and make it unattractive to the experienced golfer.
- A number of fairways will be narrowed making it too difficult for the less experienced golfer and more likely that they will lose their balls down the steep banks.
- The new layout would greatly increase the distance between greens and tees, making it unattractive to all golfers.

Thus the result of the plans, when if ever they were completed, would result in the gross degradation in a municipal leisure amenity, and contrary to policy OL7 as it does not result in an improvement to the amenity.

The proposals erroneously suggest that the golf course is often closed as a result of drainage issues which the remodelling would address. It is not, and the only holes which need attention, 14 and 15, are only affected at certain times of the year. Indeed there are risks associated with the use of landfill on golf courses; the compacted material can become impervious and result in poor drainage which would make the course unplayable. This has been experienced on parts of the remodelled Stockley Park Golf Course.

During the proposed remodelling works, the applicants propose to keep at least nine holes open at all times but even in their submission allude to the fact that this may not be possible. The project plan is so limited in detail, that it is impossible to determine if this is feasible at all even if health and safety standards could be maintained. Moreover the quality of the playing experience would be so badly degraded through the proximity of the adjacent earthworks and the shortness of the course, that it would be tantamount to closing the course completely. The length of time it would be effectively closed would be at least 3 year 8 months, and with all probability much, much longer, and is therefore contrary to policy R5 of the UDP.

Traffic

If the landfill project progresses as is anticipated in the application (375,000 cubic metres of compacted infill or up to 500,000m³ of excavated material) this will result in up to 50,000 lorries accessing or egressing the site, with the associated noise and vibration risk to properties in the vicinity of the route used, not to mention the consequential traffic congestion and the safety issues

from spilt soil from the trucks. The application proposes the use of the A40 access road, used for the National Grid pipeline in the first phase of the project, and to a greater extent an entrance via Skip Lane, off Harvil Road in the second phase. The application proposes to limit the number of movements per day to the Skip Lane entrance to 150 per day (75 in and out). If we accept the traffic analysis submitted by the applicant, this will result in an additional 20% of HGV movements along Harvil Road, which is already suffering from excessive traffic for the reasons set out below. The duration of this increased traffic will be between 50 and 70 weeks depending upon the type of material imported. As an Association we have monitored traffic within and in the vicinity of the village for many years in conjunction with various major developments affecting the village. As residents we experience on a daily basis significant levels of traffic entering the village through the 2 southern access points of Long Lane and Swakeleys Road. The Swakeleys Road/Harvil Road or Swakeleys Road/Breakspear Road South routes are already frequently used by traffic (including a number of heavy lorries) entering Harefield, Northwood and Ruislip and further as a cut through to Rickmansworth for traffic avoiding the road works on the M25. The existing use has already highlighted concerns

Harvil Road is a well known accident black-spot as a result of the relatively narrowness of the road, speeding vehicles and/or the camber of the road. The exact accident statistics would need to be obtained from the local police but recent measures to raise awareness of speeding have failed to address this problem. However, as residents we are aware of recent fatalities on Harvil Road and regular accidents or near misses near the railway bridge adjacent to Skip Lane. In fact, as an Association we are currently putting together a submission for LBH with ideas for safety improvements for this part of Harvil Road. Increased use of this part of Harvil Road and use of the junction with Skip Lane will only exacerbate the risk of accidents in this location. Road damage could also be expected from the increased lorry traffic. Harvil Road already suffers from regular water main damage from existing traffic levels. We understand from local residents that properties adjacent to Swakeleys Road also suffer from cracking. Further, the eastbound A40 slip road at the junction with Swakeleys Road is heavily congested not just with the above mentioned traffic but also with traffic entering Uxbridge, particularly in the evening rush hour. The application suggests that lorry traffic movements will cease at 4pm to take account of the evening rush hour. However, this fails to realise that traffic congestion at this location can occur at any point during the day. The increased traffic generated by this proposal is therefore one reason for asking for this application to be refused, as it is contrary to policies OE1 and AM7 of the UDP.

Noise and Dust

Any infill or landfill project will by its very nature generate noise and dust. The prevailing wind from the golf course is South West. The contouring of the land means that wind funnels up and over the course and across into the residential areas of Ickenham. There is little evidence of adequate mitigation measures to alleviate this problem, and it is therefore contrary to policy MIN22 of the UDP.

Environmental issues

As mentioned above the golf course is situated within the green belt and on the boundary of the Colne Valley Park, recognised within the UDP at OL10. We understand that the applicant may not have consulted representatives of the Colne Valley Regional Park and we encourage the applicant to do so.

On the documentation presently available we are concerned that the environmental impact on the nearby gravel pits, the canal and the River Colne has not been sufficiently assessed or considered and we encourage further work on this aspect. However, at present we consider that there is insufficient comfort that the proposal will not have a negative impact on the wildlife and the natural environment.

Procedural

There are a number of concerns relating to the application process:

1. This should be considered a major application given the complexity of the proposal documents, the disruption to the community and the irreversible effect on the landscape.

2. The notification process has not been followed in that there is no notice visible on the entrance to the course nor on the public footpath through it.

3. The applicant has indicated that meetings have been held with Council officers regarding the application but has not detailed them.

Conditions

If, despite the many fundamental objections to this proposal, this application is recommended for approval, we would ask that consideration be given to conditions covering the following issues:

1. The maximum amount of infill is limited to 50,000 cubic metres.
2. The southern section of the course is re-instated as a matter of urgency, and the quality of the works approved before any other works are started.
3. Prohibition on the use of Swakeleys Road/Harvil Road/Skip Lane as an access route to the golf course.
4. Daily limits on the number of vehicles permitted to access the site.
5. Procedures to be put in place to ensure removal of mud / dust from roads and footpaths at the site access point and immediate access roads.
6. Monitoring of any properties along or nearby any access routes for vibration damage caused by the presence of the lorries.
7. Regular damping down of the infill material to limit the risk of dust carrying into the village.
8. Strict time limits on the hours of working with regular breaks to give nearby residents some respite.
9. Regular monitoring of noise levels.
10. A time limit placed on the infill project of 6 months.
11. Regular monitoring to prevent inadvertent overfill.
12. Consideration of safety issues associated with depositing large quantities of infill material on site, with use of bunding as appropriate.
13. Provision of a programme showing how the course will be kept open during the works.
14. Further consideration of the environmental impact before the application is considered further, including use of mature trees during the reinstatement rather than saplings.
15. A comprehensive review of the proposed design of the course with local golfers and golf associations.

That said, we must point out that the effects of the application cannot be fully mitigated through conditions, and on that basis we consider that the only realistic recommendation can be for refusal. In the circumstances we must file our objection to the current application and will shortly forward a petition entitling us to address the North Planning Committee on the matter. We reserve the right to add to this submission as more information becomes available.

THE DRIVE (NORTH END) RESIDENTS ASSOCIATION

I am writing on behalf of the Residents Association from the North End of The Drive and some of the residents at The Cottages. We note the applicant has addressed some of the issues raised in the initial application, but we must express our continued objection with this proposal, as outlined below:

Access/transport impact

Harvil Road is narrow, highly congested with very frequent HGV's. A very substantial part of the 375,566 m³ will be delivered via Harvil Road, and we ask the developer to consider other routes (e.g. Moorhall Road) to spread the impact over a variety of roads.

We note the comment on deliveries at all entrances cease at 16.30 hrs. However in 3.17.5 of the Project Description there is a reference to deliveries in Skip Lane ceasing at 18.30 hrs. we ask you to note this is inconsistent with 3.3.9 in the Project Description and 4.3.1 in the CEMP. We believe that 16.30 hrs is the correct cut-off. Please confirm?

The Proposed Planning Deliverables (Project Description) state average and maximum figures for

HGV movements should be provided. We can find no quoted maximum movements in the application, and ask that you obtain this.

An average of 150 HGV's/day will pass along Harvil to Skip Lane at circa 4-minute intervals creating a high risk of property damage for residents of Harvil and Swakeleys Roads with considerable additional noise.

The estimated current Skip Lane traffic of 748 HGV movements in the Traffic Assessment will increase on average by 20% if you permit the 150/day average in this application. This represents a very substantial and unacceptable increase.

The Traffic Assessment states little queuing in Skip Lane was observed in July, but we have observed 6+ skip lorries are often queuing in Skip Lane. This needs further research.

Swakeleys and Harvil Roads are heavily congested between 07.30-09.00am and 15.00pm onwards, as are the A40 slip roads. To avoid peak hour congestion, at major construction projects HGV's frequently arrive in the hours before permitted tipping to await the site opening. What actions will LBH take to ensure traffic flows are maintained, and that tailbacks on the A40 slip roads will not stretch onto the carriageway considerably adding to the danger of serious accident?

During discussions, HGV loads of 9m³ in the tight and 10m³ have been mentioned. If the true figure is 9m³, all the stated delivery movements in the latest application are significantly understated. This confusion adds to our discomfort with a project of this scale, and the ability of LBH to enforce the delivery of the project.

The substratum of Harvil Road is inadequate, evidenced by regular water main bursts between The Dogs Trust and Harvil Farm (with loss of water supply to residents). Veolia have recently advised the residents they are monitoring the situation. The additional HGV's can only worsen this unacceptable situation.

Most vehicles appear to exceed the 30mph limit by a considerable margin average speeds referred to in the Traffic Survey seem to support this. We suggest extending the South Harvil 30mph limit to Skip Lane with regular enforcement.

The applicant has indicated wheel washes and road sweepers (as necessary) will be deployed along Harvil Road. However, we are concerned whether this will be effective. Your Highway Dept. has regularly been advised of the dangerous condition of Harvil Road as a result of wet mud being spread from vehicles exiting Skip Lane (unconnected with Murphy/Transco). We request LBH to take steps to ensure that all vehicles exiting Skip Lane cannot spread any spilt material from any activities in Skip Lane.

Environmental Impact

In a stakeholder meeting the applicant stated that to avoid further delay in the event of the GLA calling in this proposal they would seek prior approval from the GLA. Can you please advise if this has happened and, if so, what the conclusions were?

It is unclear whether the proposed 375,566m³ in this proposal is in the tight and it seems probable the actual loose amounts of imported material will be considerably greater than 375,566m³, having a considerable impact on traffic and duration of the project. On a project of this magnitude this is unacceptable.

The proposal envisaged at the pre tender stage of the borough golf courses was for circa 140,000m³. We remain unconvinced that the additional financial gain (from infilling with 375,665m³) to upgrade the course is justified or necessary, due to the additional nuisance for the residents of Ickenham, considerably extended loss of amenity for golfers, and risk of a protracted completion well beyond the October 2013 plan.

The importation of inert material still represents a considerable risk to the popular Colne Valley Regional Park. This APP introduces considerably greater risk than would be necessary with a 140,000m³ proposal.

We note the applicant has stated the public footpath over the golf course will be kept open, and expect LBH will enforce this, if necessary.

We insist that LBH establish accurate level markings prior to commencement and regularly inspect and verify the as-built levels to ensure that an agreed project plan is not deviated from at any stage.

We believe that the logistics of a project of this magnitude and the precedent set by disastrous local golf course projects (e.g. Lime Trees, Stockley Park) create an unacceptable risk for delay or error. What steps will LBH take to ensure this will not occur?

To mitigate the significant risk of blight resulting from delays to the 2013 completion, we request that LBH impose a substantial performance bond from the applicant to create sufficient incentive to complete on time and in accordance with an agreed plan.

The amended application appears to have dropped any mention that material would be obtained from within a 20-mile radius, which could create substantial additional environmental impact. Please advise whether this is the case?

Golf Course

The stated intention is to maintain 9 holes to ensure the Club can be maintained. The reduced scale of the proposal makes this easier to achieve, but the course will still not be fully in play until October 2013 (some 5 years since the disruption from Transco began). This represents a huge loss of amenity to residents and golfers that could be dramatically reduced by a proposal similar to that in pre-tender documentation.

Where mature trees are removed they must be replaced by mature specimens to maintain the natural landscape and avoid the destruction of effective noise barriers.

It is clear that a refurbished course will generate more golf traffic than the existing facility. Access is dependent on privately maintained roads that were not constructed to take the volume or weight of traffic. Since the Clubhouse was constructed, residents have regularly lobbied LBH to address the accelerated destruction of the road. The Drive (North End) has now all but been destroyed (see damage where the golf course access road meets The Drive) since it was reinstated in 1982. Given the substantial lease income that the course has generated in the last 20+ years and the income that infill will generate for the landowner (LBH), we request that LBH provide alternative access.

Please will you confirm LBH's intentions with regard to any suggestion of a redevelopment of the existing clubhouse and facilities? These should be included in the proposal so that we have a picture of the total planned changes in this location.

In conclusion, as local residents we remain highly concerned about the scale and duration of this project. We support the concerns expressed by other groups that this proposal is excessive and that a far lower-impact proposal to improve drainage on the 2-3 holes would be appropriate. We see no justification for any increase over the circa 140,000 m³ of infill envisaged in LBH's pre tender information which dramatically increase the nuisance, loss of amenity, traffic and environmental impacts.

Finally, the abuse of golf courses for substantial infilling for commercial gain was challenged by CLG (on 20/01/2009), CLG recommended a ceiling of 100,000 tonnes for works under permitted waste recovery legislation and this proposal is for 0.8 million tonnes. DEFRA's consultation on Environmental Permitting Guidance on Exempt Waste Operations was due to conclude on 05.01.2010, and we trust that LBH will abide by any recommendations by DEFRA or CLG.

However, in the event of approval we expect you will take careful consideration of our serious concerns when evaluating this proposal, and at the very least:

1. Balance the substantial HGV movements by using alternative routes to Skip Lane
2. Include a substantial performance bond
3. Definitively confirm the amount of permitted material and truck loads based on loose material
4. Respect the recommendations from DEFRA's Environmental Permitting Guidance.

NORTH UXBRIDGE RESIDENTS ASSOCIATION

We share local residents concerns over 2 plus years of tipping lorries moving through the area.

The proposal is within a visually sensitive section of the Green belt and the envisaged land remodelling warrants a landscape assessment in view of the implications for the Cone Valley Park. The sectional drawings illustrate the envisaged changes at ground level but not the contextual changes to the ridge and from public rights of way. In terms of PPG2 the applicant needs to demonstrate that no material harm is to be caused to the Green Belt landscape.

The tree removal may be justified, but the introduction of new planting may require phasing, to minimise the visual impact.

On balance, the proposal offers insufficient environmental or community benefits to warrant the grant of planning permission for the development of this scale.

In the event of a permission, permission should be confined to the southern stage, accessed from the A40 slip road, to assess the traffic implications more fully.

HAREFIELD TENANTS AND RESIDENTS ASSOCIATION

No response.

THE ASSOCIATION OF THE RESIDENTS OF THE DRIVE

In summary, we believe the scope for error as well as serious disturbance to the local community and an important eco-sensitive area of local significance for this Landfill project by the LBoH and it's contractor/Franchisee is enormous. The previous Golf course Franchisee fell into financial difficulties consequently and in view of the history attaching to this particular facility we feel the LBoH has a duty to be more than usually transparent with those affected by this is project. By this we mean executive action to ensure that considerably more than the normal level of consultation with the community and scrutiny by the executive, relating to this project is applied BEFORE the go ahead is given.

More specifically however our particular objections are these:-

Overall proposal

We are sure you are aware that if there is one toxic load of toxic waste deposited on this site, because it feeds wetlands and a river you can say goodbye to a great deal of marine life for a very long time.

2.2.2. This access statement down plays the visual impact of the works on the residents on the west side of The Drive. Neither is it sufficiently specific as to which houses or how many, or by how much they will be DISTURBED. No mention is made of the noise levels of Tipper trucks and Earth moving equipment, we need professional and independent noise level measurements taken on several days before work commences and regular ones, during the progress of the works, at the cost of LBoH. If the before and after difference is 2Db all effected residents will expect to be substantially compensated for the reduced value of their property should they wish to sell, mortgage or collateralise it during the currency of the project.

2.3.1. We think the Franchisees business plan needs re-examining because we think the number of customers which will need to be attracted will be about 3.5 times more than the recorded footfall of that of their predecessors in order to enjoy a viable proposition? Because of this the sponsors have seriously underestimated the increase in visits to and fro the golf course. Excluding restaurant only visitors we estimate that to operate viably the Franchisee needs 120 visits per day during every weekday and 240 every week-end day. The traffic impact of this on the neighbourhood would be intolerable. So what is the LBoH reaction to this position, are our assumptions as to numbers correct to achieve the financial viability any investor would expect, and what would the ensuing

traffic volumes be?

2.3.2./2.3.1/2.5.1. Bearing in mind the foregoing we really ought to also review the figures supporting the Truck movements envisaged. The Weller report is sparse on detail in respect of unsightliness and NOISE. What will it be like when there are no sight or sound deadening leaves on the trees and the site is operating like an open cast mine?

3.3.5. The representatives of the ratepayers and the Council executives will fully understand the complex nature of this project. Many things can go badly wrong for the local community, and indeed for the whole Borough, the results of a bodge which be far reaching and endure for a long time, so much care and consultation is needed.

We as local residents can find no information as to the commercial structure or financial capability of Mack Trading, to whom this major project is entrusted, they are offshore and unknown to us. We therefore would like assurances that all the risks to which the community is being exposed are fully underwritten in the terms of any contract entered into with them, by our representatives.

Other general observations

- 1) Our Association requests a meeting together with the IRA to fully discuss this proposal.
- 2) We think, in the event that the proposal works the traffic impact on the neighbourhood will be horrendous and all should seek to find a suitable solution. We think for instance the local community would be less hostile should the Council and Mack Trading, especially whilst all the equipment is on site, be minded to form a completely separate access to the Golf club, the Restaurant and the occupant of Harefield House, directly from Harvil Road. Then block off the Harvil Road entrance to the North End of The Drive as well as the access road from The Drive to Harefield House and the Golf course. Such an investment would greatly empower the LBoH or its Franchisee to develop on the success they might achieve within the confines of its own separately accessible estate.
- 3) Our Chairman wrote to the Planning department in March 2009 seeking assurances and information.
- 4) We note with relief that Access to this project expressly excludes The Drive and we assume Highfield Drive.
- 5) The calculations used to arrive at the projected time scale of 100 to 120 days and the daily truck deliveries of 98 in and 98 out should be independently audited to assess the likelihood of serious project overrun, because of the incentives to dump more waste than published.
- 6) The holiday season precludes us from organising a petition both amongst our own members and those of the IRA. We therefore formally seek at least a months extension to the petition deadline.
- 7) Finally your attention is drawn to the Summary by Weller the planning consultants. This development will see considerable traffic movement and noise with the potential for dust, disturbance and the potential for the disruption of surrounding sites of importance for nature conservation and neighbouring residents.

THE RESIDENTS ASSOCIATION THE DRIVE

The proposals are of no benefit to the local community and will be detrimental to our safety, our environment and our amenity.

We strongly object to the application and again ask for the reinstatement to be carried out on the gas pipe run.

Our main objections are as follows:

- Removal of so many trees
- The importation of 375,000m³ of inert soil is excessive
- It will destroy an environment that has the natural habitat to support both wildlife and golf.
- The proposal is for commercial gain
- Traffic control over such a long period of time is a major concern
- A financial bond should be put in place to ensure the works are fully carried out
- We do not want a further blighted golf course
- The existing greens and tees can be easily restored with maintenance
- Aesthetically, the golf course is a beautiful area within the Colne Valley Park. Construction activities would result in a severe loss to the community.

MIDDLESEX COUNTY GOLF UNION

The proposed remodelling will make the golf course shorter and unbalanced with an outward par of 36 and an inward par of 32. Also within the new layout there are areas fraught with danger to golfers walking from green to tee having to avoid errant shots and the proposed sloping makes parts of the course unplayable for the elderly. The proposed changes would not benefit the existing course.

Comment: The 'playability' is considered to be a matter of more relevance to the Council as landowner than the Council as Local Planning Authority.

WARD COUNCILLOR

The revised submission for the landfill of Uxbridge Golf Course is causing concern to local residents and therefore in representing them, I would make the following observations which I would request to be submitted and included in the planning report. I also request that this application goes to committee for determination.

- a) The degree of land filling proposed would warrant an unacceptable amount of road transportation to the site passing residential properties and traffic congestion especially on those roads that support the motorway links and bus routes to include Swakeleys Road and Harvil Road which already suffer traffic congestion.
- b) The course does need reinstatement and two holes remodelled to overcome drainage problems but this application goes beyond what is needed.
- c) There will be a loss of mature trees and will be detrimental to the horizon landscape.
- d) Access to the site from Harvil Road will further cause traffic congestion and the road undulations already impairs driver visibility and this will be increased further for lorries turning in and out of the site.
- e) Harvil road already suffers mud on the road surface due to Uxbridge Skip Hire and this activity will further increase this problem to a road that has recorded road accidents and fatalities.
- f) Residents feel that the Golf Course is being used for financial gain for Mack Trading and not to improve the facility for the community, as currently Mack Trading does not currently provide a good service to the community especially to our disabled residents.
- g) The degree of land filling is excessive and would degrade the visual qualities of the course by

denuding it of most of its trees, and turning the course which uses the natural contours of the land into an unnatural landscape

h) Whilst not a planning issue, is Mack Trading a viable company with sufficient experience and financial backing to undertake a task of this nature?

Would you therefore note my concerns and request that this application be refused.

Internal Consultees

POLICY AND ENVIRONMENTAL PLANNING

1. Site

The proposal site is located in Uxbridge Golf Course. The site is designated as Green Belt land. The site is bordered by a waste management site to the north, farmland to the northeast, residential properties to the south-east, grazing land and the A40 to south, and meadow grassland and wet woodland (in a nature reserve and SSSI) to the west.

2. London Plan

The London Plan sets out the Mayor's strategic objective for the future of Green Belt Land in London and aims to ensure that Green Belt is maintained and protected.

Policy 3D.9 sets out the Mayor's strategic objective for the future of Green Belt Land in London and aims to ensure that Green Belt is maintained and protected. The London Plan states that there is a general presumption against inappropriate development in the Green Belt, and such development should not be approved unless in very special circumstances.

Policy 3D.14 Biodiversity and nature conservation seeks to protect, promote and manage biodiversity.

3. Main Policy Issues

Land-use

The site is located within designated Green Belt land. Under the terms of UDP Policy OL1 development in the Green Belt is normally unacceptable unless it is agriculture, cemetery or recreation related.

The main policy issue in relation to this scheme is the impact of the proposal on the openness of the Green Belt and the visual amenities.

The proposal is for the remodelling of the golf course. Golf courses are considered an appropriate Green Belt use. However, the potential visual impact that the re-modelling of the golf course could have on the Green Belt must be considered. Therefore, regard should be taken to Policies OL2 and BE13 which safeguard the Green Belt and ensure the harmonisation of any proposed development.

Officers would also need to be satisfied that the scale of the proposed scheme is not going to harm the openness of the Green Belt, including any impact on ecology, and that it is consistent with Policy OL9 Areas of Environmental Opportunity which includes the Colne Valley Park.

Policy OL5 will only permit proposals for development adjacent to or conspicuous from the Green Belt if it would not harm the character and appearance of the Green Belt. It is unlikely that the re-contouring of the land would be visible from afar and would not affect the overall character and openness of the Green Belt, and would consequently be compatible with PPG2 and Policy OL5 and OL9 of the UDP Saved Policies.

Ecology

The application site is located in proximity to several legally protected sites that have a statutory designation, such as a SSSI site and others that have been designated on a non-statutory basis, including Sites of Importance for Nature Conservation (SINC). There are legally protected species in proximity of Uxbridge Golf Course.

Policy EC1 and EC2 state that nature conservation interests will be taken into account in considering proposals for development of land especially within sites of borough (Grade II) and local importance. The protection of species afforded by the wildlife and countryside act 1981 (amended 1985) will be a material consideration and where appropriate an ecological assessment may be required before it determines development proposals.

Policy EC3 requires proposals for development in the vicinity of sites of nature conservation importance to have regard to the potential effects on such sites of changes in the water table and of air, water, soil and other effects which may arise from the development.

Policy EC5 may require certain on-site ecological features to be retained in new developments and seek to enhance the nature conservation and ecological interest of sites or create new habitats through the use of planning conditions attached to planning permissions or through planning agreements negotiated with developers.

An ecological assessment has been provided within the application and officers should be satisfied that the nature conservation area is not compromised. However, mitigation measures should be managed through a Biodiversity Management and Monitoring Plan and could be implemented through planning obligations.

5. Conclusion

No objections in principle to the proposed scheme.

TREES AND LANDSCAPE OFFICER

The Site

The golf course features a number of trees, including mature specimen Oaks and Poplars, semi-natural deciduous woodland and copses. There are younger stands of trees forming landscape buffers between the fairways, thought to have been planted (approximately 30 years old) as part of the golf course development. Existing trees and woodland are significant landscape features on the course. Together with the existing sloping gently undulating landform, open fairways and rough grassland, the trees provide a parkland setting and define the location and orientation of greens, fairways and tees within the course. The wooded slopes are also visible to the public from local public footpaths, the towpath (Grand Union Canal) to the west and the M40/A40 to the south.

Trees on the site are not protected by Tree Preservation Order or Conservation Area designation due to the fact that it is owned and, therefore controlled by, the Council. The licence agreement with the managing agent, Mack Trading Ltd, stipulates that no work to trees can take place without the prior agreement of the Council.

Tree Survey

A tree survey and arboricultural implications assessment, together with drawing No. 05 Rev A, has been submitted, which follows the recommendations of BS5837:2005. The survey describes the methodology for the survey in section 3. Root protection zones are specified and indicative tree protection measures provided. The implications assessment is detailed in section 4 and temporary tree protection measures are described in section 5.

With regard to the proposed method of tree protection, it is noted that one option is the

specification of chestnut pale fencing to BS1772 Parts 1 and 4, with the alternative option of Heras fencing to BS5837:2005. In my view the local planning authority should expect fencing to be to BS5837 around the individual specimen trees. The lower specification, to BS1772, may be acceptable around larger areas of woodland.

The report concludes (section 6) that tree surgery and selected removal should take place prior to the erection of the protective fencing and prior to the commencement of development. It considers that the new golf course layout makes provision for the significant trees on, and adjacent to, the site. The use of no-dig surfacing in selected areas may also be required.

The report notes that further pre- and post-commencement details can be provided, in the form of an Arboricultural Method Statement, by condition.

The development proposal and tree impact plan is provided in Appendix A.

The tree assessments are tabled in Appendix B in which 55No. individual specimen Oaks were tagged and surveyed (T510-T564). Most of these are categorised as A grade trees (good quality and value/should be retained as part of any new development), with a few lesser quality trees including B grade (moderate), C grade (poor) and R (dead or dying/justifying removal on the grounds of sound management).

Further to this, 25 tree groups and areas of mixed woodland are described (G1-G25). These groups also vary in quality and value from A-C, with some groups containing trees within the range A-R.

A summary of the tree retention/removal strategy is provided on the Tree Impact drawing No. 14.

At 4.2, the report notes that, at the time of writing, the location of the haul routes had yet to be decided. However, it is noted that the haul routes have subsequently been proposed. The northern route, via Skip Lane, will involve tree removal and will require a detailed survey and arboricultural implications assessment, prior to approval.

The proposal

The proposal is described in the Design & Access Statement, the Project Description (and other supporting documents) for a phased redevelopment and enhancement of the golf course. The proposal involves no new buildings and is essentially the creation of a new landscape. This will involve the removal of selected trees (including the young plantations) and much of the grassland, the importation of inert soil, the creation of new land-form, installation of new drainage, new planting, habitat creation and subsequent management as an 18 hole golf course. The landscape objectives include the retention of individual specimen trees (notably the Oaks), semi-natural woodland, ditches, valley bottom wetland features and footpaths.

The most significant impact of the development will be the new landform created from the importation of approximately 350,000 cubic metres of imported soils. A Visual Appraisal report describes the proposed re-modelling and considers the visual effects from 17 viewpoints around the site. The Impact Statement report (section 5.0) describes the effects on the land and considers that, while the course will have a more undulating landform, the basic topographical landform, sloping from east to west, will remain. Plan ref. 11 Rev A clearly shows the areas of cut and filled land, and those areas of land on which no change of level is planned.

Section 10 of the Design & Access Statement concludes that the impact of the proposed changes will be limited in terms of visual impact due to the existing terrain which is already sloping and the existing use. A key landscape objective for the design of the new course is the retention of the healthy mature Oaks, together with the semi-natural deciduous woodland, copses and wetland features within the valley bottom.

Other stated landscape objectives for the remodelled course include the intention to complement and enhance the local landscape quality and biodiversity of the site while enhancing the playing experience.

The proposed landscape plan ref. 03 Rev A provides details of the vegetation typologies proposed for the golf course and the sites designated for habitat creation.

Mature Oaks

In the course of pre-application discussions, concern was raised by the local planning authority that there may be unintended damage, over time, to the mature Oaks, caused indirectly by changes to the drainage and the local water table.

A report has been submitted, Potential Impact on Mature Oak Trees at Uxbridge Golf Course, which assesses the effects of the hydrological changes to the land and the potential impacts of the scheme on the trees. The report concludes (at 6.1) that the effects of excess water and/or physical damage to the trees pose the greatest threat to the trees. However, the design and detailing of the course has taken into account the needs of the trees and no change of levels, physical damage or waterlogging will occur close to the trees or their root protection areas.

Furthermore, at 6.2 reference is made to the ongoing monitoring plan which will be prepared to support the biodiversity management of the site. The report proposes (6.2.3) that tree health/water table monitoring be incorporated within the management plan.

Haul Roads

One of the temporary impacts on the site, during construction, is the need for haul roads to facilitate access to the site for the handling and movement (including importation) of soils.

Access to the narrower southern half of the site will be via the existing access and yard, recently constructed and now vacated, by the National Grid during the installation of the Harefield-Southall Gas Pipeline. This will continue to be accessed from the east-bound slip road from the A40, approaching Swakeleys Roundabout. It is understood that less than 50% of the imported material will be brought onto the site using this route.

Access to the northern (broader) end of the site will be via Skip Lane, off Harvil Road. This access is less straightforward, involving the removal of woodland from the relatively steep, south-facing, slope. A new ramped haul road will be required in order to facilitate lorry movements from the higher level of Skip Lane onto the site of the 3rd hole which is some metres below. Pre-application discussion indicates that this haul road will be built on a temporary embankment for the duration of the construction phase. The extent of woodland removal has not been quantified, and the damage to flora and fauna associated with this temporary structure has not been assessed. It should be noted that the width of the corridor of land required to accommodate the embankment will inevitably be greater than that required for the haul road itself. More than 50% of the imported material will be brought onto the site via the northern access point. It is understood that there may be traffic impact/highway management concerns associated with this route.

Ecological Impact Assessment

The proposal includes an Ecological Impact Assessment and extended phase 1 Habitat Survey, dated 2009. While not qualified to comment on the quality of the information submitted, It is noted that the report concludes (chapter 6) with an assessment of the effects of the development on the local flora and fauna. At 6.2.9 the potential effects on the scattered Oak trees during the construction phase are considered and, at 6.2.10, the effects post-construction/during operation. The report concurs with the Tree Impact Report (by Weller) that the effects of the earthworks and drainage proposals on the mature Oaks will not be significant.

At Appendix D, protection measures for the Frays Farm Meadows SSSI are described. Appendix E proposes lists of native herbaceous plants, shrubs and trees recommended for specific areas within

the site. The plant lists include species suitable for the rough/marginal grasses, meadows, wild flowers, ponds, aquatic marginal and woodland creation.

Key Landscape Issues

Green Belt

- The improvement of the existing golf course involves no built development or change of use within the Green Belt.
- The proposed changes to the landform will not result in any new high points, or ridges, which will break the skyline with all newly raised levels accommodated within the existing range of contours.
- While significant areas of trees will be removed to accommodate the new landform, the specimen trees and areas of woodland with the greatest landscape (visual) and ecological value will be retained and protected as part of the new layout.
- The changes will create opportunities for extensive areas of native tree/woodland renewal and other vegetation management aimed at enhancing biodiversity.

Biodiversity

- An Ecological Impact Assessment has been submitted and SSSI protection measures proposed in Appendix D.
- A Tree Survey (document dated November 2009) and Arboricultural Implications Assessment, in accordance with BS5837:2005, has been submitted (see drawing No. 05 Rev A). Trees have been assessed as individuals (and tagged)
- The retention of trees of amenity value has been one of the guiding influences on the location of the earthworks and the layout of the new golf course.
- The use of the existing southern access point, off the A40, is not anticipated to generate any additional landscape impact at the point of entry (at the southern end of the proposed 9th hole).
- The impact of the proposed new access haul route at the north-west corner of the site, accessing the proposed 3rd hole, is less clear. The point of access will involve the removal of trees from the wooded slope and the construction of retaining walls, or embankments, to support the haul road and negotiate a significant change of levels. The difference in levels between Skip Lane and the northern part of the golf course means that the land required for the haul route is likely to be considerably greater than the width of the track itself.
- According to the Ecological Impact Assessment (Appendix C, p.87) there is a badger sett and evidence of fence push up and badger snuffle holes close to the proposed northern access point.

RECOMMENDATION (SPLIT)

No objections to the development of the southern half of the site, subject to conditions TL1, TL2, TL3, TL5, TL6, TL7, TL21.

While no landscape objection to the proposed (finished) development at the northern end of the site is raised, at this stage, there is insufficient information regarding the detrimental effects of the temporary haul road on existing vegetation and, possibly, a nearby badger sett, to support the development at the northern half of the site.

S106 OFFICER

The likely planning obligations arising from this proposal should it be recommended for approval are as follows:

Proposed Heads of Terms:

1. Transport: in line with the SPD a contribution or highways agreement may be sought to deal with the proposed access arrangements resulting from the proposal. Thought will have to be given for how the construction traffic is managed. Given the nature of the scheme TfL may seek a travel plan

however, how practical this is given the nature of the application I am unsure.

2. Construction Training: In line with the SPD if the proposal has an estimated construction cost of £2m or a construction period of longer than 3 months then it is likely that a construction training contribution will be sought as a result of this proposal. In line with the formula a contribution equal to £2,500 for every £1m build cost will be sought. It is also likely that a contribution towards the construction training co-ordinator will also be sought.

3. Environmental Improvements: in line with the SPD there may be some form of land restoration bond secured to ensure that the works are undertaken. Please seek comments from EPU over this.

4. Project Management and Monitoring Fee: In line with the SPD if a s106 is entered into then 5% of the total cash contributions will be sought to enable the management and monitoring of the respective agreement.

ENVIRONMENTAL PROTECTION UNIT (EPU)

Control of Specified Activities

Chapter 3.4.1 of the Impact Assessment states that a project duration of between 100 and 120 weeks would require an average of 98 tipper truck deliveries per day. EPU notes that in Chapter 3.4.8 it is stated that no delivery traffic will be permitted to use The Drive as a through route. A finish time for vehicle movements accessing and exiting from the Swakeleys roundabout is mentioned in Chapter 3.4.4, EPU would therefore recommend the following condition be applied;

Deliveries to and collections from the site shall not occur other than between the hours of 0730 and 1600 Mondays to Fridays and 0800 to 1300 on Saturdays. There shall be no deliveries or collections on Sundays or Bank Holidays

Reason: To safeguard the amenity of surrounding areas.

Under the Control of Pollution Act 1974 works audible at the construction site boundary are restricted to the following hours;

- 0800 to 1800 Mondays to Fridays
- 0800 to 1300 on Saturdays
- At no time on Sundays or Bank Holidays

Dust

Current government guidance in PPS23 endorses the use of conditions to control impacts during the construction phase of a development. With this in mind the following condition is recommended;

The development shall not begin until a scheme for protecting surrounding dwellings from dust emitted from the construction works, has been submitted to, and approved by the LPA. The scheme shall include such combination of dust control measures and other measures as may be approved by the LPA.

Reason: To safeguard the amenity of surrounding areas.

Chapter 5.3 Construction and Environmental Management Plan

- Dust, Smoke and Particulates

Appendix A has been completed in line with the current Best Practice Guidance from the Mayor of London specifically for evaluating the potential for dust nuisance from construction sites. The outcome of this assessment is that the site is determined as Low-risk category. As such the

mitigation measures set out in Chapter 5 are appropriately determined.

Land Contamination

The land at the golf course does not have a contaminative use. However there may be some residual oil in the tee near Uxbridge Skip Hire from a small oil spill. There was a large British Benzol oil spill in 2000 but this passed through the ditch in the golf course to the nature reserve and lakes which were badly damaged. There are some sensitive nature sites nearby. The submitted documentation confirms that the soils will be inspected/sampled at source and on site as necessary. There is a waste reception clerk proposed. The guidelines indicate that a six monthly report will be available for the EHO (and LPA I presume). We can require these controls by planning conditions on any permission. The idea of regular updates on soil sources and import testing rather than receiving information in compliance at the end of the works is welcomed.

Some concerns on the high values derived for the human health import criteria remain. It is not considered that the levels of some contaminants would be acceptable for what is currently an uncontaminated golf course. They are considerably above what is expected for a clean import based on past experience of the EPU.

The compounds that appear too high include Hg, Free CN, Phenol, Cd, and As. Be, Se and Vn are high but are unlikely to be found in soil waste. Some of the 16 PAHs are high too. pH should be measured on the soils. Perhaps a lower SOM might reduce these target levels. The problem is that the Council will be looking for clean source materials and with some of these target levels, it is not considered that incoming unsuitable waste would be identified from the testing. The source sites also would be able to export material with quite high soil contaminant levels to the Council's Golf Course. For example if some gasworks waste were accidentally imported, the free CN target levels of 16,000 mg/Kg would not identify such waste for removal, identification would be dependent on the operator's site inspections particularly the visual inspection of the incoming loads when tipped out of the lorries.

The problem is that using the target levels derived for human health risk may miss the requirement that the Council only requires uncontaminated material at this location. Although we would expect a full restoration of the site with the topsoil being replaced as a cover layer we would not wish any contaminated material to be encapsulated below the golf course. This could potentially affect receptors and/or affect any use or value of the Council's land in the future.

It would be useful if the source and on site testing results are forwarded to the EPU and LPA after analysis, and for the site a careful record is kept of which area the on testing results refer to. In this way there it will be possible to identify the waste location if any of the results indicate unsuitable wastes.

Although there were some initial reservations about the testing regime at the site, these details are now contained in the Construction Environmental Management Plan. It does not however say how regularly the LPA will be kept informed of the results.

RIGHTS OF WAY OFFICER

Public Right of Way U50 runs from Harvil Road to the Grand Union Canal. It is a legally registered Public Right of Way and was historically established, therefore any change to its defined route or extinguishment must be carried out through a Legal Order.

This footpath is included in the Colne Valley Park and is included in publicised walks and the route is part of direct off road links from Ickenham/Ruislip into Buckinghamshire and the Grand Union Canal.

With this in mind the following comments are provided:

Photographs of the path to be taken before and after construction to record any damage to the route.

No blockages, diversion, closure on the path during construction, if needed by legal order.

After completion (or during) any damage to the path be made good

Any future habitat enhancements bordering the footpath must be managed to avoid area becoming overgrown and without management.

Path to be made as safe as possible during construction, fence etc.

Re-surfacing of the route with hogging or a type 2 surface leading to the Grand Union Canal as part of improvements would greatly enhance the walking experience of residents and visitors to the borough.

HIGHWAY ENGINEER

The proposals are to remodel the course at Uxbridge Golf Course. Two temporary construction accesses are proposed, one to the south of the golf course and one the north of the golf course.

Previously, 200 two-way per day trips (approximately 100 arrivals and 100 departures) were suggested for the duration of the course remodelling, but no supporting information was provided to justify the suggested trips and the duration of the works.

As per the Transport Assessment, the total volume of fill required for remodelling will be 375,665m³. Approximately 180,721m³ is proposed to be brought in through the southern access, and the remaining 194,944m³ is proposed to be brought in through the northern access. The anticipated number of deliveries is an average of 75 (150 HGV movements) per day to the southern access and an average of 100 (200 HGV movements) per day to the northern access. Based on 10m³ soil per load, the delivery duration is proposed to be 12 months for the southern access and 8 months for the northern access.

It is noted that there are inconsistencies in the other submitted documents regarding the number of deliveries, duration, and volume of material per load. This therefore needs to be clarified.

The southern access would utilise the slip road off A40, which is understood to have recently been used by National Grid. TfL is the Highway Authority for this road and should therefore be consulted on the acceptability of the proposals associated with the southern access.

The northern access is proposed from Skip Lane off Harvil Road, which is a private road and is in industrial use. The applicant is believed to be currently in negotiations to secure an access through Skip Lane. Harvil Road is a Classified Road and is designated as a Local Distributor Road in the Council's Unitary Development Plan. Harvil Road is a traffic sensitive street between 7.30am-9.30am and 4pm-7pm Monday to Saturday. Swakeleys Road, Harvil Road, and the A40 slip roads are heavily congested during the above times. TfL should be informed of the concerns regarding traffic congestion on the slip roads, which has also been raised by the members of public.

The developer has failed to provide the route of delivery lorries and a breakdown of delivery lorry movements during the day, including the traffic sensitive hours.

The developer has failed to provide satisfactory information in relation to road safety at the junction of Harvil Road and Skip Lane, at the access point off Skip Lane and details of the northern access point including levels and gradients. This information has also been requested repeatedly.

In the absence of information, the proposals are considered to be prejudicial leading to conditions

detrimental to road safety and traffic congestion. The application is therefore recommended to be refused, as it is considered to be contrary to the Council's Policy AM7.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The whole of the application site is designated as Green Belt. The main policy issue in relation to this development is considered to be the principle of additional development within the Green Belt and its impact on the character and appearance of the Green Belt. Of particular relevance are UDP Saved Policies OL1 and OL4. Policy OL1 states that agriculture, horticulture, nature conservation, open-air recreation and cemeteries are the only open land uses which are acceptable. New buildings are only acceptable if they are essential for the open land use. No new buildings are proposed as part of this development.

London Plan Policy 3D.9 states that Green Belt is to be protected from inappropriate development and as such inappropriate development should not be approved except in very special circumstances. Both Saved UDP Policy OL1 and London Plan Policy 3D.9 flow directly from PPG2, which sets out appropriate uses in the Green Belt, including open recreation. The proposal is for the remodelling and improvements to an existing Golf Course. Golf courses are considered an appropriate Green Belt use.

PPG2 recognises the most important attribute of the Green Belt is its openness. It is considered unlikely that the re-contouring of the land would be visible from afar and as such, would not affect the overall character and openness of the Green Belt. Given the limited visual impact and the fact that openness does not necessarily equate to flat or uniform topography, or negate the inclusion of tall vegetation, it is considered that the proposal does maintain the openness of the Green Belt and would not detract to a detrimental degree from its attractiveness as a recreational destination. The golf course development complies in general with the key theme contained within PPG2 by keeping land permanently open.

Paragraph 1.6 of the PPG states that the provision of opportunities for outdoor recreation near urban areas is a positive role that the Green Belt land can play. The proposed development provides outdoor sport and recreation facilities. This is also in accordance with PPG17, which identifies outdoor recreation as an appropriate Green belt activity.

The imported material is defined as waste material for planning and environmental purposes and the application has therefore been referred to the Mayor. Although it is accepted that the importation of waste materials can be common practice for the creation of new golf course features 375,000m³ of material is an extremely significant quantity. Annex A of PPS10 'Planning for Sustainable Waste Management' states "that in respect of applications which are properly to be decided by the district planning authority but which involve the use of large amounts of engineering fill for such purposes as levelling or landscaping of sites or construction of bunds and embankments, it may be appropriate for the district planning authority to question the applicant about the purpose of the development".

Although Saved Policies MIN20 and MIN21 identify pollution control measures and the impact of landfilling on the local hydrogeological regime as a material considerations, there are no specific UDP Saved Policies setting out the criteria against which this type of proposal should be assessed. However, it is considered reasonable to ensure that the amounts of waste deposited are the minimum necessary for the intended purpose. As a result, a key issue to be considered in assessing this application is whether the

importation of waste materials is essentially financing the proposed development and consequently the key driver behind the proposals, or whether the proposed amount of fill is reasonable and the minimum necessary for achieving the proposed development. Clearly, contributing to the funding of the development is usually one of the purposes of the importation, and if the extent of adverse environmental impact does not outweigh the benefit to be derived from the development, then the question of what exactly constitutes a minimum requirement for purpose may not be so relevant.

The applicants have provided a justification (summarised below) for the amount of imported waste, in order to achieve the following objectives:

A) Drainage Issues

Whilst the course has historically been a well patronised facility, there have been major issues with drainage which result in very wet conditions underfoot on most of the holes across the site, in particular along the lower western side of the site. As a result the course sees far less use in the wetter months with some holes unplayable for 4 to 6 months of the year.

A combination of raising and re-grading the existing topography using inert soils imported from construction sites and the installation of a new pipe drainage network will address the drainage issues, allowing the course to be played throughout the year. A more undulating landscape will be created, to add golfing interest and difficulty but also to ensure that surface water moves more rapidly into the drainage network.

B) Course Quality and Environment

For the golf club to remain an active public amenity with a healthy volume of usage it is imperative that the entire course is refreshed, to offer a more attractive golfing layout with exciting new holes offering state of the art green complexes (USGA specification), larger and more attractive tee complexes, better bunkering and more undulating fairways. In addition a significant investment in a new irrigation system will be installed to replace the aging system currently in use.

Provision of a bund along the northern boundary, to protect the course from the various businesses along the northern boundary, which include a large skip company, two waste transfer stations and quarry/batching plant. These businesses generate significant dust and noise all year round, but particularly in the drier summer months. This physically affects both the players and the quality of the playing surfaces. In particular the greens cannot be maintained to an acceptable level of quality due to the level of dust cover affecting the growth of the grass.

C) Safety

Safety concerns have been raised by residents of the Drive with golf balls entering back gardens which is due to the position of golf holes in relation to course boundaries, the remodelling offers the opportunity to relocate the landing areas of the existing 9th and 10th holes (new 8th and 9th holes) away from the property fence lines thereby improving the current safety parameters.

D) Course Routing

The northern part of the course is very linear and regular in form as a result of the straight, open drainage channels that run parallel to and across fairways, and the lines of non-native Poplars. The areas between these fairways lack any under-storey vegetation and contrast somewhat with the old oak trees that mark the alignment of former hedgerows. It is proposed that the northern section of the course is re-routed to provide

more exciting golf holes and to remove the confused and tedious layout of the holes in this section of the course. One hole is removed from this area, to create a less constricted arrangement, and replaced by a new short hole in the central area, where more space is available.

E) Impact of New Gas Pipeline

Work is necessary to provide additional health and safety protection over the pipeline, repair a significant area of subsidence on the existing 9th fairway resulting from the pipe laying works, reduce the gradient/alignment along the existing 9/10th hole to improve safety of residents and provide a more playable surface.

F) Golf Experience

The proposed improvements at the golf course are imperative to ensure that Uxbridge is a course of choice for all standards of golfers in the Borough and particularly its season ticket holders.

(The Golf Club point out that the proposed course is some 319 metres shorter than at present. Par 68 will be maintained, but with an outward 9 of 36 and an inward par of 32, the golf course will be unbalanced. The club also have issues with the proposed pars for individual holes and the design of certain parts of the new course. The club points out that the adjoining commercial establishments to the north would be in danger of flying golf balls, because of the new layout of the 2nd hole, and that players would also be in danger generally. In addition, the course would not be particularly suited to players who are not fit).

It is considered that the applicant has provided a robust justification for the remodelling works in some areas, including drainage, land slippage and the gas pipeline reinstatement. However, it is acknowledged that where soils are being used to create a golfing environment, the question of what makes a good design is very subjective. These are specialist areas and there clearly appears to be some debate as to whether the proposed works would improve course routing and the golf experience as the applicants claim.

It is also acknowledged that in some cases it would be possible to achieve the same range of contour variation with less or even without any soil importation, simply by lowering all the levels and using localised cut and fill to a greater extent, but in these cases the viability of the scheme and the extent of environmental impact (high water table, tree retention etc) would need to be taken into consideration.

Given the above factors, it is difficult to quantify what would be the optimum or minimum amount of fill required to achieve the stated objectives. Nevertheless the general principle of the development can be supported, subject to consideration as to whether the material planning benefits outweigh any planning objections or potential harm, relating to noise and disruption during operations, dust, heavy traffic movements, duration of operations, ecological and landscape impacts. These issues have been addressed below, in relevant sections of the report.

7.02 Density of the proposed development

Not applicable to this application.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

The site does not fall within a Conservation Area or Area of Special Character. There are no archaeological issues associated with this application.

7.04 Airport safeguarding

There are no airport safeguarding issues associated with this application.

7.05 Impact on the green belt

Saved Policy OL2 seeks landscape improvements within the Green Belt. Saved Policy OL5 will only permit proposals for development adjacent to or conspicuous from the Green Belt if it would not harm the character and appearance of the Green Belt. Saved policy OL26 seeks the protection and enhancement of trees, woodland and landscape features. Saved Policy OL9 seeks to improve the environmental quality of land within the Cone Valley Regional Park.

Uxbridge Golf Course sits in the Green Belt and the Colne Valley Regional Park, on the west side of the ridge between South Harefield and Ickenham, with a landscape shaped over time by the River Colne and its predecessors. The current golf course uses the natural contours of the land, and the views from points at the top of the ridge, such as the Clubhouse and the public footpath, offer an exceptional vista across the fairways and the Colne Valley beyond.

The most significant impact of the development will be the new landform created from the approximately 350,000 cubic metres of imported soils. A Visual Appraisal Report describes the proposed re-modelling and considers the visual effects from 17 viewpoints around the site. The Impact Statement Report describes the effects on the land and considers that, while the course will have a more undulating landform, the basic topographical landform, sloping from east to west, will remain.

A series of cross sections have been provided to illustrate the extent of the landfill proposed. The central area is confined to the western edge of the course, while the northern section generally covers the full width of the course. Working from north to south, and east to west, the changes can be summarised as follows:

At the north west corner, extensive landfill is proposed up to 8 metres in height. This is the area with greatest elevational changes. The second fairway will be raised up to 4 metres. Fairway 3 will be raised between 1-2 metres.

The second playline will be raised by up to 3 metres, the 17th fairway by approximately a metre; the 18th tee raised by up to 5 metres and the 16th playline by approximately 4m.

The 1st and 4th fairway will remain largely unchanged. However the 18th fairway will be raised by an average of 4 metres, while the 16th, fairway will be partially raised up to 3 metres at its eastern end, gradually reducing to no fill at the western end.

In the proximity of the existing footpath that bisects the site, the 1st, 4th, 5th fairways and 6th tee will remain unchanged. There will be a raising of ground levels up to 3 metres along the 15th playline.

The area around the club house, the existing wood to the west will remain unchanged. Further to the west, the 14th fairway will be raised up to 3 metres.

To the south of the club house, the 7th green, 7th fairway and 14th playline will be raised by approximately 3 metres.

Landfill up to 3 metres east of the pipeline to provide level fairway to 14th hole.

Generally the extent of the works to the southern section of the course is the creation of a

series of terraces with land fill between 1- 4 metres, to provide more level fairways. The central area is confined to the western edge of the course, while the northern section generally covers the full width of the course.

Land use after construction will break down to approximately:-

- (Total Site Area = 33.7 Ha.)
- Golf Course (tees, greens, fairways and semi-rough) = 215,760m²
- New Unimproved native Grassland (ie out of play rough) = 59,740m²
- New wet grassland, vegetative ditches and ephemeral ponds = 26,000m²
- New Pond 500m²
- New Woodland planting = 34,000m²
- New Alder Carr Planting = 1000m²
- Existing Woodland = 36,033m²

In percentage terms this equates to approximately:-

- 64% Fairways, greens, tees and semi rough
- 17% Out of play rough (unimproved grassland)
- 8% New wet grassland, vegetative ditches and ephemeral ponds
- 1% New Pond and Alder Carr
- 10% New Woodland Planting

The improvement of the existing golf course involves no built development or change of use within the Green Belt. The proposed changes to the landform will not result in any new high points, or ridges, which would break the skyline. In percentage terms, the elevation changes are as follows:

- 7 - 8 m 0.1%
- 6 - 7 m 0.3%
- 5 - 6 m 0.9%
- 4 - 5 m 2.4%
- 3 - 4 m 8.2%
- 2 - 3 m 11.8%
- 1 - 2 m 13.8%
- 0 - 1 m 14.1%
- 1 - 0 m 3.3% (cut)
- 2 - 1 m 0.5% (cut)

All newly raised levels will be accommodated within the existing range of contours. While significant areas of trees will be removed to accommodate the new landform, the specimen trees and areas of woodland with the greatest visual landscape and ecological value will be retained and protected as part of the new layout.

Overall, it is considered that the visual impacts of the proposal are unlikely to be of significant detriment to the character of the area, or the perception of openness of the Green Belt, due to the existing landscape character and use and the proposed planting strategy. It is therefore not considered that the amenity and openness of the Green Belt and this part of the Colne Valley would be harmed to a detrimental degree by the proposals, in accordance with Saved Policies pt 1.29 and OL1, OL2, OL5, OL9 and OL26 of the UDP.

7.06 Environmental Impact

Saved Policy MIN20 requires any new proposals for landfill to demonstrate the incorporation of gas control and monitoring schemes, to take account of landfill gas,

ensure ancillary activities do not affect pollution control measures and to provide suitable protection for pollution control measures. Saved policy MIN21 requires the impact of land filling on the hydroecological regime to be taken into consideration, including monitoring of the water table and any appropriate mitigation measures once land restoration is complete. Saved policy OE1 seeks to protect areas from development that would result in pollutants, unless sufficient measures are taken to mitigate the environmental impact. Policy OE11 seeks to limit harmful or hazardous substances which are a potential safety risk unless appropriate ameliorative measures are proposed to overcome the risk.

The land at the golf course does not have a contaminative use. However there may be some residual oil in the tee near Uxbridge Skip Hire, from a small oil spill. With regard to existing land contamination, the Environment Agency requires a remediation strategy in the event that contamination not previously identified is found to be present at the site. This condition is to protect the aquifer under the site and could be imposed in the event of an approval. In addition, the applicant would be required to obtain the appropriate exemption or authorisation for any imported waste. However The Environment Agency is unable to specify what exactly would be required at this stage, due to the limited amount of information provided.

All sub-soils for the remodelling of the course will be imported to the site. The applicants state that imported soils will consist of excavated, uncontaminated earth spoils and soils. However, it is unclear where the applicant is importing the soil from and the precise constituents of any imported soil. As outlined within the 'Description of the Development' section of the planning application, the soil has been defined as being 'discarded'. This would suggest that the soil is an indirect waste from another process or operation. Waste Management Licencing Regulations 1994 defines waste as: "any substance or object which the producer or the person in possession of it, discards or intends or is required to discard." Based upon the above evidence, the planning application is being considered as being a waste application, even though the operations may be exempt from requiring a Waste Permit. The application is therefore referable to the Mayor.

The application documents indicate that all soils for importation will be free of litter (e.g. paper, wood and plastic) and putrescible or biodegradable matter. Samples from all sites of origin will be tested according to current Waste Management Licensing regulations. These soils will be inspected/sampled at source and on site as necessary. There is a waste reception clerk proposed. Although the Environmental Protection Unit had some initial reservations about the testing regime at the site, these details are now contained in the Construction Environmental Management Plan. The Plan does not however specify how regularly the Council will be kept informed of the results. However, these controls could be secured by way of conditions or a legal agreement, in the event of planning permission being granted.

The developer has submitted a report assessing the human health risks for a future golf course use, and provided standards for chemical contamination within the imported soils on this basis. The Environmental Protection Unit has concerns that some proposed values, although based on future risk, may allow soils for deposit that are not clean inert soils, as are now present on this uncontaminated site. The Environmental Protection Unit advise that using the target levels derived for human health risk may miss the requirement that the Council requires only uncontaminated material at this location and that the contamination criteria is considerably above what is expected for a clean import. The chemical contaminant standards for checking the suitability of the imported soils are therefore not fully agreed between the developer and the Environmental Protection Unit.

Although the chemical contaminant standards for the imported soils have not been agreed, it is not recommended that the application be refused on this basis, as it is considered that these matters could be overcome by the imposition of suitable conditions or planning obligations, in the event of an approval. However, this lack of agreement between the applicants and the Council's Environmental Protection Unit at this stage, on what is expected for a clean import, adds weight to concerns raised by Natural England and The Wildlife Trust regarding potential impacts on water quality in the adjoining Nature Conservation sites and SSSI, as all run-off and drainage from the golf course will be directed to these areas, during both the construction and operational phases.

7.07 Impact on the character & appearance of the area

This issue has been covered in Section 7.05

7.08 Impact on neighbours

It is proposed that deliveries of soil using the slip road access will take place between 7.30am and 4.30pm Monday to Friday with no operations on Saturdays or Sunday. Works on the site will continue until 6.30pm during the week with no deliveries permitted after 4.30pm in order to remove any impact on peak rush hour traffic in the area of Swakeleys roundabout. Due to the better access off from the A40 it is considered that 100 deliveries per day will be received at this entrance.

Deliveries via the new access on the northern boundary are proposed to take place between 7.30 am and 6.30pm Monday to Friday with no operations on Saturday or Sunday. The deliveries from this access will be restricted to an average of 75 loads per day to provide a better spread of traffic along Harvil Road and the entrance to Skip Lane. The Environmental Protection Unit raises no objections to these delivery and working hours and recommends that these be secured by conditions in the event of an approval.

The Council's EPU have raised no objections to the application in terms of noise and disturbance, subject to the compliance with the condition mentioned above. Had the application been acceptable in other respects, it is not considered that the operational activities and vehicle movements associated with the proposed development would result in the occupiers of surrounding properties suffering any significant additional noise, pollution, disturbance or visual intrusion, in compliance with Saved Policy OE1 of the UDP.

Safety concerns have been raised by residents of the Drive with golf balls entering back gardens which is due to the position of golf holes in relation to course boundaries, the remodelling offers the opportunity to relocate the landing areas of the existing 9th and 10th holes (new 8th and 9th holes) away from the property fence lines, thereby improving the current safety parameters.

7.09 Living conditions for future occupiers

There is no residential component to this application.

7.10 Traffic impact, car/cycle parking, pedestrian safety

Saved Policies AM2 and AM7, of the UDP are concerned with traffic generation and road capacity.

Two temporary construction accesses are proposed. The existing access on the A40 slip road up to Swakeleys roundabout, until recently employed by National Grid construction traffic, will be used for the works in the southern section of the course, while a new temporary site access, off Skip Lane is proposed for access the northern section of the course. The latter would involve an 8m wide cutting on the northern boundary. The haul road will follow the route of the existing Gas Pipeline site haul road and golf course

maintenance route through the western side of the central woodland block, to reach the main body of the golf course.

A Transport Assessment has been submitted in support of the application. The Assessment shows that of the 375,665m³ total volume of fill required for remodelling, approximately 180,721m³ is proposed to be brought in through the southern access and the remaining 194,944 m³ through the northern access. The anticipated number of deliveries is an average of 75 (150 HGV movements) per day to the southern access and an average of 100 (200 HGV movements) per day to the northern access. Based on 10m³ per load, the delivery duration is proposed to be 12 months for the southern access and 8 months for the northern access. However, it is noted that there are inconsistencies between the Transport Statement and other submitted documents regarding the number of deliveries, duration, and volume of material per load. By using a volume of 10m³ per truckload instead of the industry standard of 9m³, there may be an underestimation of the number of loads required to deliver the packed volume of landfill. Therefore, it is estimated that between 37,665 and 41,740 HGVs (depending on the level of compaction of there imported soil) would access the site during the construction period.

The southern access would utilise the slip road off the A40. TfL, which is the Highway Authority for this road, has raised no objections to the use of the existing temporary access, subject to the submission and approval of a Construction Management Plan. Had the application been acceptable in other respects, this could have been secured by condition.

The northern access is proposed from Skip Lane off Harvil Road. Skip Lane is a single track private road, serving various industrial uses. Harvil Road is a Classified Road and is designated as a Local Distributor Road in the Council's Unitary Development Plan. Harvil Road is also a traffic sensitive road between 7.30am-9.30am and 4pm-7pm Monday to Saturday. The Highway Engineer advises that Swakeleys Road, Harvil Road, and the A40 slip roads are heavily congested during these peak times.

The application proposes to limit the number of movements per day to the Skip Lane entrance to 100 per day (200 HGV movements). On the basis of the submitted traffic analysis, this will result in a considerable increase in HGV movements along Harvil Road, which local residents insist, is already suffering from excessive traffic. The duration of this increased traffic will be approximately a year depending upon the type and availability of material imported.

The concerns of the Highway Engineer regarding the impact of the proposals on the surrounding road network are shared by local residents and amenity groups, who point out that they experience on a daily basis, significant levels of traffic on Swakeleys Road, Harvil Road and Breakspear Road South. They also point out that Harvil Road is a well known accident black-spot, as a result of the relatively narrowness of the road and speeding vehicles and that recent measures to raise awareness of speeding have failed to address this problem.

The application does not include details of the route/s of delivery lorries and a breakdown of delivery lorry movements during the day, particularly during the traffic sensitive peak hours. The application has also failed to include satisfactory information in relation to road safety at the junction of Harvil Road and Skip Lane, at the access point off Skip Lane and details of the northern access point, including levels and gradients. In the absence of this information, the Highway Engineer considers that the proposals would lead to conditions detrimental to road safety and also lead to traffic congestion. The application is therefore

recommended for refusal, as it is considered to be contrary to UDP Saved Policy AM7.

7.11 Urban design, access and security

Not applicable to this application.

7.12 Disabled access

Not applicable to this application.

7.13 Provision of affordable & special needs housing

Not applicable to this application.

7.14 Trees, Landscaping and Ecology

TREES AND LANDSCAPING ISSUES

Saved policy OL2 seeks landscape improvements within the Green Belt. Saved policy OL26 seeks the protection and enhancement of trees, woodland and landscape features. Saved policy BE38 seeks the retention of topographical and landscape features and the provision of new planting and landscaping associated with development proposals. Saved policy EC2 seeks the promotion of nature conservation interests. Saved policy EC5 seeks the retention of features, enhancements and creation of new habitats

The majority of the site will contain the same number/intensity of golf holes with associated golf features: tees, fairways, bunkers, greens and semi-roughs. This is no different from what currently exists but the layout of the holes is slightly different. The areas between each hole will be managed as rough unimproved grassland with extensive areas of planting. There are also a number of areas (particularly to the West of the site) defined as wet/dry zones, which will be managed less intensively and allowed to develop naturally.

The design carefully considered the important trees and woodland copse on site and as a result all of the mature/maturing Oaks and mature/maturing woodland copse have been retained whilst the less valuable (both aesthetically and ecologically) Poplar trees (usually within groups) have been removed in places to allow for the upgrade of the golf course. The Poplar groups (with occasional additional species) would most likely have been planted as part of the original golf course design to divide fairways. Being non-native and out of character with what is essentially an Oak woodland/wet woodland landscape character, it was felt that the clearance of the Poplars (less than 30 years of age) would not only improve the landscape qualities of the site but provide the opportunity to plant more appropriate and sustainable native species. The use of more appropriate shrub species and their careful location in the area of proposed holes 2, 3 16 and 17 will allow improved growing conditions for the golf course. Reduced shade and increasing air movement are prerequisites for good golf course maintenance.

The impact of the build up in levels on the existing mature Oaks was raised as a concern by the Landscape Officer. In order to satisfy the local authority that there will be no detrimental impact on these trees, an additional report has been prepared that highlights the issues involved. The report covers the existing hydrological conditions, the potential for the water table and soil moisture conditions to change, the likely impact this may have on the trees and measures that can be undertaken to identify and combat at an early stage any stress affecting particular trees. The submitted information includes comments indicating the proximity of fill, potential for impact and mitigation measures for each surveyed tree. The reduction in application area to avoid works on the higher part of the site means that a number of mature oak trees that would have been down-slope of imported soils will now not be.

To remain in top condition despite weather conditions and volume of play, the greens are to be at least 500 - 550m² in size. This also allows for the proposed undulations on the surface for putting and chipping interest. The total teeing area for each hole will be at least 450m² so that winter mats can be avoided whenever possible. Bunkers have been carefully determined to limit intrusion from key viewpoints. Grass swales and hollows have been employed in the most visually sensitive locations.

The proposed planting has been designed to reflect the surrounding native vegetation and enhance the habitat and biodiversity of the golf course. A further consequence of the planting proposals will be additional golfing interest, seclusion and a degree of additional safety within the site.

A key theme within the landscape strategy is the development of wildlife corridors across the site which will not only link habitats within the site but also those beyond the course boundaries especially to the west of the site. 1m to 10m buffer zones, areas of unmanaged grassland, will be left along the boundaries and around sections of the proposed ponds/wet dry zones.

The Tree and Landscape Officer raises no objections to the proposed landscape strategy and the tree protection measures including those to individual Oaks. However concerns are raised regarding the proposed haul road and new temporary northern access off Skip Lane. This access is will involve the removal of woodland from the relatively steep, south-facing, slope. A new ramped haul road will be required, in order to facilitate lorry movements from the higher level of Skip Lane onto the site of the 3rd hole which is some metres below. It is likely that this haul road will be built on a temporary embankment for the duration of the construction phase. The Tree and Landscape Officer notes that the extent of woodland removal has not been quantified, and the damage to flora and fauna associated with this temporary structure has not been assessed. It is also noted that the width of the corridor of land required to accommodate the embankment will inevitably be greater than that required for the haul road itself. The submitted plans and documentation do not clearly illustrate the route of the proposed northern haul road or provide details of the northern access, or provide sufficient information regarding the impact of these works on existing vegetation, including trees and woodland. The proposal is therefore contrary to Policies BE26 and BE38 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

ECOLOGY

PPS9 outlines the Government's commitment to sustainable development and in particular to conserving the natural heritage of the country for the benefit of this and future generations. Policy 3D.12 of the London Plan states that the planning of new development and regeneration should have regard to nature conservation and biodiversity and opportunities should be taken to achieve positive gains for conservation through the form and design of development. Policy EC3 of the UDP requires proposals for development in the vicinity of sites of nature conservation importance to have regard to the potential effects on such sites on changes in the water table and of air, water, soil and other effects, which may arise from the development. Regarding the creation of new habitats, Policy EC5 of the plan seeks the retention of certain on-site ecological features enhancement of the nature conservation and ecological interest of sites or create new habitats.

The development site lies directly adjacent to the Fray's Farm Meadows Site of Special Scientific Interest (SSSI) and close to the Denham Lock Wood SSSI. Both of these sites

are also part of the Mid Colne Valley Site of Metropolitan Importance, which is a section of the Colne Valley with a diverse range of high quality habitats. These reserves play an important role within the broader landscape of the Colne Valley and contribute to the region's biodiversity.

The Ecological Impact Assessment submitted as part of this application states that there are a number of potential effects of the proposal on the Fray's Farm Meadows SSSI during construction and operational phases. The most significant of these are:

- during the construction phase, the opportunity for the erosion of soil and its down slope transport into the SSSI, which could lead to die back of vegetation and localised reduction in water oxygen levels, with implications for aquatic invertebrates;
- a slight increase to the rate which water run off (via stream flow) enters the SSSI;
- all runoff/drainage from the site will be directed to the SSSI during both the construction and operational phases;
- during the operational phase, the likelihood of unpredicted potential pollution to increase;
- the overall effect of the scheme will be to drain the course more rapidly than currently

The EcIA suggests that these will be subtle changes and will not impact on the SSSI interest features. The report also states that there is scope for designing in buffering areas and incorporating sediment management measures.

However, Natural England, London Wildlife Trust and Hillingdon Natural History Society have a number of concerns in relation to the proposals, particularly in relation to the potential impacts on the hydrological systems of the Colne Valley. Due to a lack of information in relation to the potential impacts, particularly in reference to the Fray's SSSI, these bodies object to this application. The key issues are set out below:

Water Quality

Natural England points out that there is no information available regarding the quantities of water that would be entering the SSSI or whether the quantity/quality of water that currently enters the site is appropriate to the special interest of the site. Natural England also has potential concerns regarding the use of fertilisers and chemicals on the golf course, particularly as the EcIA states that all run off will be directed onto the SSSI.

These concerns are shared by both London Wildlife Trust (LWT) and Hillingdon Natural History Society (HNHS) who manage the adjacent nature reserves on behalf of the Borough. LWT manage Fray's Farm Meadows and Denham Lock Wood both designated as Sites of Special Scientific Interest (SSSI). LWT point out that the pattern of water flow and retention throughout the golf course and the adjacent Local Nature Reserve is complex and are concerned that there will be unforeseen effects within the SSSI, where the ditches are a vital part of the ecological system which gives the SSSI its value. The lack of detail on the hydrological implications of the proposed development is of significant concern to LWT, who consider that the proposal breaches UDP Policies EC1 and EC3 in this regard.

In addition LWT is concerned about ditch water quality where golf course run-off may find its way into Frays Farm Meadows SSSI. Since there is little information relating to the quantity and quality of water that will enter the SSSI, there can be no certainty of the likely impact of this development on the SSSI LWT therefore recommend that the application be refused on this basis, in accordance with UDP Policies EC1 and EC3.

HNHS who manage the adjacent Harefield Place Nature Reserve which abuts the golf

course, are concerned about the changes to the hydrology of the area in terms of the impact on Water Voles that inhabit the ditches both through and adjoining the golf course. HNHS is particularly concerned about the ditch that runs south, along the western edge of the course and about water flows into North Wood at holes 15 and 16. The wood has shallow ditches at this point. Any changes to the ratio of flows between these points and the most northerly drainage ditch will change the characteristics of the central portion of the wood. HNHS point out that although part of the course is waterlogged some of the time, if this accumulated water is drained off quickly, instead of being stored and released slowly as at present, it is likely to cause flooding further downstream. This could have a serious impact on the water vole population in the ditch which could be flooded out. HNHS have also raised concerns regarding the considerable increase in vehicle movements which may result in unintended pollutants such as fuel and oil, which would ultimately, ends up in the complex series of ditches leading to the River Frays.

In terms of the irrigation of the re-contoured golf course, the application states that water will be applied to the golf course for irrigation purposes most evenings during periods without rain. However, it does not state where this water would be sourced from. LWT is concerned that the use of fertilisers on the course and the increased drainage will affect soil quality in Denham Lock Wood SSSI. LWT points out that no nature reserve should have any fertiliser added, as this changes the plant communities, encouraging species which thrive on nutrient rich soil. These vigorously compete with rarer plants which are an essential part of the reason the SSSI exists. Natural England would expect to receive assurance that the proposed irrigation and drainage would not affect the water table or hydrology of the surrounding sites, including the SSSI.

Imported materials

Natural England also states that there is a lack of information on the potential impacts of the imported materials on the SSSI. Although the Diffuse Pollution Technical Note states that maintenance of sediment control measures will prevent sediment-related diffuse runoff and transport of sediment into the SSSI, there is no information to support this statement and there is no mention of what quantities of sediment currently enter the SSSI and how this would be impacted by the proposals. Natural England would also expect to receive further assurance regarding the potential for any contaminated materials or sediments to enter the SSSI or any water course connected to it.

LWT also has concerns in this regard and request that should this development be permitted, the amount of fill used must be carefully controlled to ensure that it does not result in the works encroaching further than approved or being more visually intrusive, whilst the inert nature and source of the soil needs to be carefully monitored, so that there are no changes in the chemical composition of soil or run-off and no introduction of invasive species which could negate any wildlife benefits which the proposals might otherwise bring. HNHS questions what procedures will be put in place to ensure no minerals or alien plants and seeds are imported, given the existing problems with Himalayan Balsam and Japanese Knotweed on the Reserve they manage.

Species issues

The Ecological Impact Assessment raises issues of protected species, including bats and water voles. The Assessment (EclA) identifies the presence of water voles in the ditch adjacent to the western edge of the proposed works, close to the existing footpath and track. LWT states that whilst in their final state, the proposed works may not have a significant impact (as long as there are no new water quality issues) and the designation

of the adjacent area as wet grassland will be of benefit, it has serious concerns about the potential impact during construction. A high bank is proposed immediately to the east (and a new pond adjacent to the ditch on the west side). The future of the existing track is not apparent from the plans, and if this barrier is lost LWT state that there must be a serious risk of potentially disastrous encroachment. LWT's overall concern regarding the important population of water voles in the SSSIs relate to the potential effects of construction and operation works on the delicate habitat requirements of this species. In this respect, LWT would need stronger reassurance and more specific detail on what steps the applicants propose to take to protect this species. Until specific and robust specifications are put in place to ensure protection and conservation of water vole populations in the vicinity, LWT request that this application must be rejected, as it breaches UDP Saved Policies EC1 and EC3 in this regard.

LWT has also raised concerns that the proposals will prejudice its ability to effectively manage the nature reserves, as the existing track does not appear on the planning application plans. This will undermine its efforts to effectively manage these SSSIs, and therefore LWT object to the application on this basis.

The Ecological Assessment states that final analysis of impacts will be completed in a Final Construction Environmental Management Plan (CEMP) and Biodiversity Management and Monitoring Plan (BMaMP). However, these have not yet been produced. Only a partial Construction Environmental Management Plan has been provided to address some issues, but it does not include full details of biodiversity issues. A further CEMP is to be produced to set out how potential effects on the SSSI from construction activities will be avoided/minimised and a Biodiversity Management and Monitoring Plan will be implemented, ensuring the protection of the adjacent SSSI. Natural England states that without this information at this stage it is not possible to ascertain the full level of potential impacts on the SSSI and therefore object to this application.

As with the SSSI issues, it is suggested that a Biodiversity Management and Monitoring Plan and Construction Environmental Management Plan will be produced to address any potential issues in related to protected species. Protected species are a material consideration in planning decisions Natural England point out that the extent of impacts should be established prior to permission being granted in accordance with National Policy. As neither Plan have been finalised and the extent of impacts on protected species have not been fully addressed, Natural England object to this application on the grounds of insufficient information.

Natural England supports the proposed habitat enhancement and creation measures within the golf course site and there are also positive aspects to the native planting schemes and species projects. LWT also state that many ecological aspects of the proposals are covered quite thoroughly in the application's supporting documents. Indeed, there is the potential for aspects of these to contribute significantly to the biodiversity of the area where they relate to the restoration of the areas affected by the gas pipeline. However, concerns remain, for the reasons set out above.

In conclusion, it is considered that the submitted ecological assessment has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area and the biodiversity interests of the neighbouring sites. It is therefore considered that the ecological interests of the site and locality would not be protected, contrary to Policies EC1 and EC3 of the Unitary Development Plan Saved Policies (September 2007), London Plan Policy 3D.14 and PPS9 (Biodiversity and Geological Conservation).

7.15 Sustainable waste management

PPS10 stresses the need for a sustainable structural approach to waste management, putting into context the waste hierarchy, reduction, re-use, recycling and composting, energy recovery and disposal. Development of this site and the re-use of inert waste will make a significant contribution towards London's targets for inert waste re-use and recycling.

7.16 Renewable energy / Sustainability

The Mayor does not consider that the application needs to be accompanied by an Energy Statement.

7.17 Flooding or Drainage Issues

Flooding

Policies OE7 and OE8 seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding.

A Flood Risk Assessment has been submitted as part of the application taking into consideration the principles of Planning Policy Statement 25 (PPS25) and other relevant regional and local policies. The Assessment identifies a small section of the site lies within Flood Zone 3a. No new impermeable areas are proposed. The development has been designed to improve the drainage and reduce the flood risk on site. None of the development area will drain off site so surface runoff from the development will have no impact on neighbouring land. The impacts of climate change have been reviewed in terms of increased precipitation intensity and increased flood levels. Although this shows that runoff generated from the site may increase slightly, there is plenty of capacity in the marshland, buffer zones, drainage ditches and swales for this additional runoff. The site is above climate change flood levels, except the marshlands. It is important to carry out regular checks and maintenance of the hydraulic structures, such as drains and ditches, verifying good performance and removing sediment and vegetation. The traffic on site during the remodelling of the two areas should be kept to a minimum and cease when the soil is waterlogged or very wet.

The Environment Agency has raised no objections to the scheme, subject to a condition requiring the development to be only be carried out in accordance with the approved Flood Risk Assessment (FRA) Final Report K0148 (Rev 1) and the following mitigation measures detailed within the FRA:

Limiting the surface water run-off generated by the 1 in 100 year critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site. This is to prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.

Subject to the recommended condition, it is considered that development would not increase the risk of flooding and therefore is in accordance with Policies OE7 and OE8 of the Hillingdon Unitary Development Plan Saved Policies 2007, Policy 4B.6 of The London Plan (February 2008) and Planning Policy Statement 25: Development and Flood Risk.

Drainage

The applicants submit that whilst the course has historically been a well patronised facility, there have been major issues with drainage, which result in very wet conditions underfoot on most of the holes across the site, in particular along the lower western side of the site. These problems are associated with the slope down from the east, the impermeable clay soils and the naturally high water table. As a result, the course sees far less use in the

wetter months with some holes unplayable for 4 to 6 months of the year. Poor drainage increases wear on sports turf, hampers maintenance and creates boggy muddy areas unfit for play. 3% to 5% slopes are required to achieve efficient surface and subsurface fairway drainage, and there must be sufficient space between the prevalent water table and the ground surface for a sub-surface piped drainage network to be installed.

A major justification for the remodelling works to the golf course has therefore been to improve the drainage to address these problems. A combination of raising and re-grading the existing topography, using inert soils imported from construction sites and the installation of a new pipe drainage network are proposed to address these drainage issues, allowing the course to be played throughout the year. A more undulating landscape will be created, which would ensure that surface water moves more rapidly into the drainage network. Maintenance and therefore presentation of the course will be much easier to implement, which will be to the long term benefit of the facility.

An irrigation system will be re-installed to cover greens, tees and approaches. Soakaways and open ditches are proposed to essentially provide a catchment area for any runoff. These catchment zones will also provide both an ecological and visual amenity as they will be wet/dry in nature and support marginal species of flora.

There is no objection in terms of flood risk, to improving the drainage of the golf course, provided the development is carried out in accordance with the submitted Flood Risk Assessment. However, concerns remain over the lack of detail regarding the hydrological implications of the proposed development on the adjoining nature reserves, as detailed elsewhere in this report. These concerns are reflected in reason for refusal relating to ecology.

7.18 Noise or Air Quality Issues

The Environmental Protection Unit has advised that Construction and Environmental Management Plan - Dust, Smoke and Particulates Appendix A has been completed in line with the current Best Practice Guidance from the Mayor of London, specifically for evaluating the potential for dust nuisance from construction sites. The outcome of this assessment is that the site is determined as Low-risk category. As such, the mitigation measures set out in Chapter 5 are appropriately determined. Had the application been acceptable in other respects, the proposed mitigation strategy could be secured by conditions. Noise issues have been dealt with elsewhere in the report.

7.19 Comments on Public Consultations

The principle issues raised in the submissions have been addressed in the main body of this report under the relevant headings.

7.20 Planning Obligations

Policy R17 of the Hillingdon UDP is concerned with securing planning obligations for environmental improvements and enhancement. This UDP policy is supported by more specific Supplementary Planning Guidance. As the application is being recommended for refusal, no detailed negotiations have been entered into with the developer in respect of these obligations, although the applicants have indicated that they are prepared to enter into negotiations with respect to certain obligations. However, if the application were to be considered for approval, the following broad Section 106 Heads of Terms would be pursued by the Council at that time:

- (i) A contribution towards the management and maintenance of the adjacent Nature Reserves
- (ii) Improvements to the public footpath (boardwalks)
- (iii) A land restoration bond (this would need to be properly quantified and justified as a protective measure).

- (iv) A financial bond to secure the provision of aftercare.
- (v) Implementation of an Environmental Management Plan (particularly important as there is a nature reserve and SSSI in close proximity to the site).
- (vi) Highway Improvements in respect to the new site access.
- (vii) Measures to ensure a safe crossing of the existing public footpath which runs across the site
- (viii) A Green Travel Plan outlining the means and methods of reducing private transport use by employees and facilitating increased use of public transport. The Green Travel Plan shall be implemented for a minimum period of 10 years from completion and implementation of the use hereby permitted;
- (ix) In relation to land remediation/existing contamination, reports and surveys must first be carried out by the Owner/Applicant, which identifies remedial measures.
- (x) A maintenance and monitoring (time limited) contribution to the Local Planning Authority.

7.21 Expediency of enforcement action

There are no enforcement issues relating to this site.

7.22 Other Issues

Should the application be approved, a temporary Stopping up Order may be required for the temporary haul road to cross the existing public footpath.

8. Observations of the Borough Solicitor

When making their decision, Members must have regard to all relevant planning legislation, regulations, guidance, circulars and Council policies. This will enable them to make an informed decision in respect of an application.

In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights (the Convention) directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

Article 6 deals with procedural fairness. If normal committee procedures are followed, it is unlikely that this article will be breached.

Article 1 of the First Protocol and Article 8 are not absolute rights and infringements of these rights protected under these are allowed in certain defined circumstances, for example where required by law. However any infringement must be proportionate, which means it must achieve a fair balance between the public interest and the private interest infringed and must not go beyond what is needed to achieve its objective.

Article 14 states that the rights under the Convention shall be secured without discrimination on grounds of 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status'.

9. Observations of the Director of Finance

None.

10. CONCLUSION

The general principle of the development can be supported, as the proposal is for the remodelling of an existing golf course and no change of use or buildings are proposed. The proposal complies in general with the key themes contained within national, London Plan and local Green Belt Policies by keeping land permanently open.

The Mayor considers that while the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan. Changes, including a site Waste Management Plan, extensive consultation with relevant organisations and consultation with TfL on the southern access might remedy the deficiencies in the application, and could possibly lead to the application becoming compliant with the London Plan.

Whilst no objections are raised to the overall landscape strategy and the tree protection measures, including those to individual Oaks, concerns remain regarding the lack of detail of the proposed northern haul road and access, and the potential loss of trees and woodland in that area.

Furthermore the application has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area. Although the chemical contaminant standards for the imported soils have not been agreed, these matters could be overcome by the imposition of suitable conditions or planning obligations, in the even of an approval. However, concerns remain regarding potential impacts on water quality and hydrology in the adjoining Nature Conservation sites and SSSI, as all run-off and drainage from the golf course will be directed to these areas during both the construction and operational phases.

In addition, the application does not include details of the route/s of delivery lorries and a breakdown of delivery lorry movements during the day, particularly during the traffic sensitive peak hours. The application has also failed to include satisfactory information in relation to road safety at the junction of Harvil Road and Skip Lane, at the access point off Skip Lane and details of the northern access point, including levels and gradients. It is likely that the proposal would lead to conditions prejudicial to highway safety and unacceptable levels of traffic congestion on the local road network.

The applicant has failed to provide contributions towards the improvements of services and facilities as a consequence of demands created by the proposed development in respect contributions towards the adjoining nature reserves and improvements to the public footpath which bisects the site.

Refusal is therefore recommended accordingly.

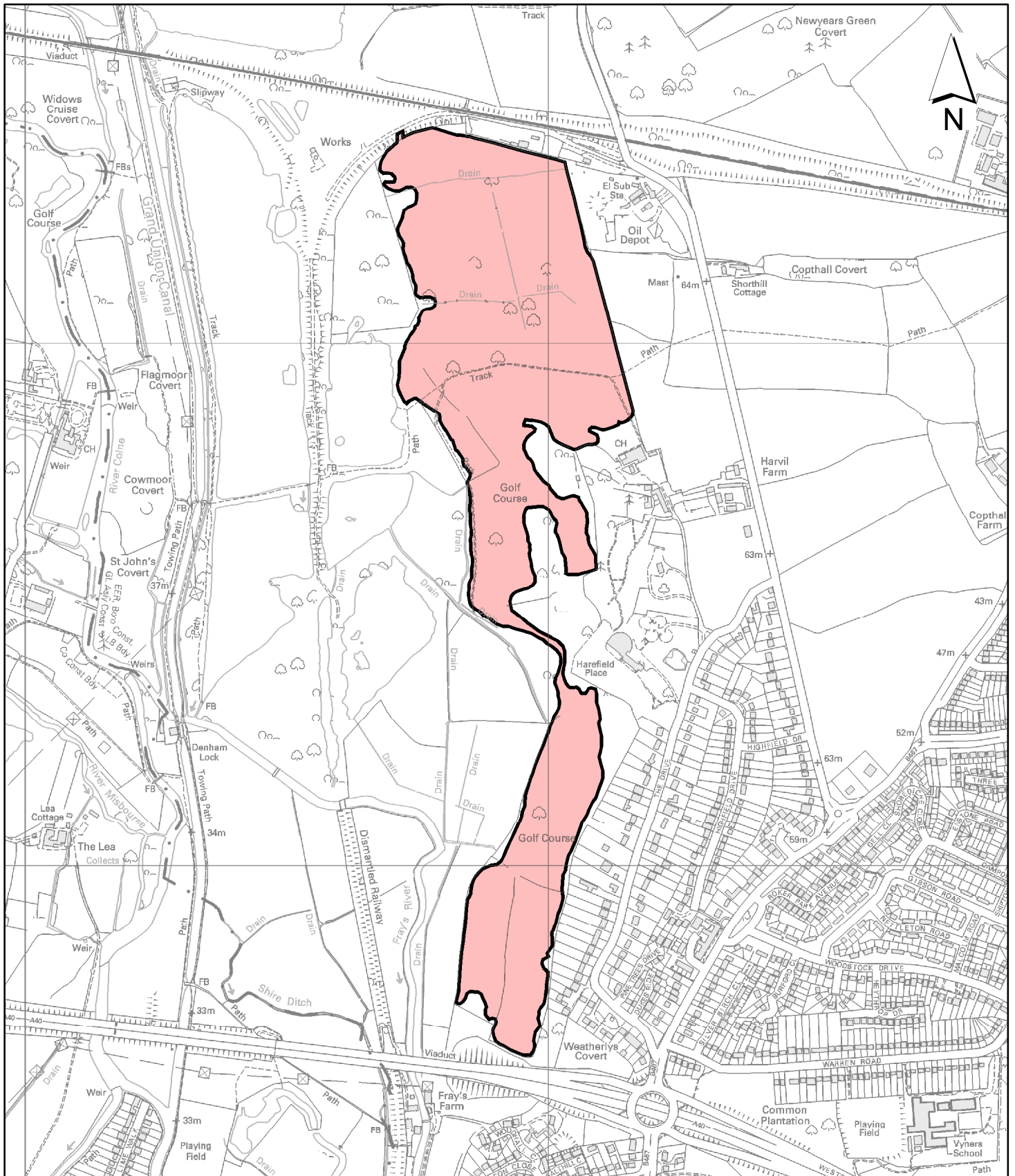
11. Reference Documents

- PPS1: Delivering Sustainable Development February 2004
- PPG2: Green Belts January 1995
- PPS7: Sustainable Development in Rural Areas July 2004
- PPS9: Biodiversity and Geological Conservation September 2005
- PPS10: Planning for Sustainable Waste Management September 2005
- PPG13: Transport March 2001
- PPG16: Archaeology and Planning November 1990
- PPG17: Open Space, Sport and Recreation September 2001
- PPG25: Development and Flood Risk July 2007
- Unitary Development Plan Saved Policies (September 2007).

Responses from consultees

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Notes

 Site boundary

For identification purposes only.

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Site Address

**Uxbridge Golf Club
The Drive
Ickenham**

Planning Application Ref:
4601/APP/2009/2622

Planning Committee
North

Scale
1:10,000

Date
February 2010

**LONDON BOROUGH
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