

Report of the Head of Planning, Transportation and Regeneration

Address RUISLIP GOLF COURSE ICKENHAM ROAD RUISLIP

Development: Full application for remodelling of Ruislip Golf Course, incorporating: reconfiguration of 18 existing hole course into a nine hole course, short game practice area, putting green and six hole academy course; construction of a single storey rifle range; demolition of existing covered driving bays and construction of replacement driving range, including associated floodlights and safety netting; a new drainage system and associated ponds; ecological and landscaping works; realignment and enhancement of the Hillingdon Trail and creation of a new public footpath; excavation of a new channel for the Ickenham Stream (canal feeder); and other associated works.

LBH Ref Nos: 10737/APP/2020/3359

Drawing Nos:

- 1MC04-SCJ-TM-STA-SS05_SL07-000001 Transport Statemen
- 1MC03-SCJ-EN-ASM-SS05_SL07-000001 Noise Impact Assessment
- 1MC04-SCJ-EV-REP-SS05_SL07-000009 Arboricultural Survey Report
- 1MC04-SCJ-DR-ASM-SS05_SL07-000001_C06 FRA Oct 21
- 1MC04-SDH-EV-REP-SS05_SL07-000001_C01 Flood Level Analysis
- 1EW02-CSJ-EV-REP-S002-000148 C02 Archaeological Assessment
- 1MC04-SCJ-DR-ASM-SS05_SL07-000001_C06 FRA Oct 21
- 1MC04-SCJ-DR-REP-SS05_SL07-000003_C06 Drainage report
- 1MC04-SCJ_SDH-DR-DDE-SS05_SL07-564501
- 1MC04-SCJ_SDH-DR-DDE-SS05_SL07-564502 Drainage
- 1MC04-SCJ_SDH-DR-DDE-SS05_SL07-564503 Drainage
- 1MC04-SCJ_SDH-DR-DPL-SS05_SL07-561101 Drainage Plan
- 1MC04-SCJ_SDH-DR-DPL-SS05_SL07-561102 Drainage Plan1
- 1MC04-SCJ_SDH-DR-DPL-SS05_SL07-561103 Drainage Plan1
- 1MC04-SCJ_SDH-DR-DSE-SS05_SL07-562251 & 2 Drainage Sections
- HS2 Code of Construction Practice
- 1MC04-SCJ-PL-STA-SS05_SL07-000001 Planning Statemen
- 1MC04-SCJ-EV-STA-SS05_SL07-000002 Ecological Impact Assessment (EcIA)
- 1MC04-SCJ-SDH-EV-REP-SS05-SL07-000007 Species Report
- 1MC04-SCJ-EV-STA-SS05_SL07-000002 Ecological Impact Assessment (EcIA)
- 1MC04-SCJ-SDH-EV-REP-SS05-SL07-000006 Preliminary Ecological Appraisal
- 1MC04-SCJ-EV-REP-SS05_SL07-000008 Archaeological Desk Based Assessment
- 1MC04-SCJ-EV-REP-SS05_SL07-000006 Geoenvironmental Desktop Study Report
- 1MC04-SCJ-DR-ASM-SS05_SL07-000001 Flood Risk Assessment (FRA)
- 1MC04-SCJ-DR-REP-SS05_SL07-000003_C06 Drainage report
- 1MC04-SDH-EV-REP-SS05_SL07-000001_C01 Flood Level Analysis
- 1MC04-SCJ_SDH-EV-PLN-SS05_SL07-000001 Outline Material Management Plan
- DAS_Part3
- DAS_Part2
- DAS_Part1

DAS_Part4
 DAS_Part5
 DAS_Part7
 DAS_Part6
 1MC04-SCJ-EV-DPL-SS05_SL07-241000
 1MC04-SCJ-EV-DGA-SS05_SL07-240400
 1MC04-SCJ-DR-DPL-SS05_SL07-241001(2)
 1MC04-SCJ-DR-DPL-SS05_SL07-241002(2)
 1MC04-SCJ-EV-DPL-SS05_SL07-241001
 1MC04-SCJ-EV-DPL-SS05_SL07-241100
 1MC04-SCJ-EV-DPL-SS05_SL07-241150
 1MC04-SCJ-EV-DPL-SS05_SL07-241200
 1MC04-SCJ-EV-DPL-SS05_SL07-241110
 1MC04-SCJ-EV-DPL-SS05_SL07-241500(1)
 1MC04-SCJ-EV-DPL-SS05_SL07-241210
 1MC04-SCJ-EV-DPL-SS05_SL07-241501(2)
 1MC04-SCJ-EV-DPL-SS05_SL07-241300
 1MC04-SCJ-EV-DPL-SS05_SL07-241550(1)
 1MC04-SCJ-EV-DPL-SS05_SL07-241600(1)
 1MC04-SCJ-EV-DPL-SS05_SL07-241610(1)
 1MC04-SCJ-EV-DSE-SS05_SL07-242200(1)
 1MC04-SCJ-EV-DPL-SS05_SL07-241503(2)
 1MC04-SCJ-EV-DPL-SS05_SL07-241502(1)
 1MC04-SCJ-EV-DSE-SS05_SL07-242212
 1MC04-SCJ-EV-DSE-SS05_SL07-242213
 1MC04-SCJ-EV-DSE-SS05_SL07-242210(1)
 1MC04-SCJ-EV-DSE-SS05_SL07-242211(1)
 1MC04-SCJ-EV-DSE-SS05_SL07-242217
 1MC04-SCJ-EV-DSE-SS05_SL07-242218
 1MC04-SCJ-EV-DSE-SS05_SL07-242214
 1MC04-SCJ-EV-DSE-SS05_SL07-242215
 1MC04-SCJ-EV-DSE-SS05_SL07-242216
 1MC04-SCJ-EV-DSE-SS05_SL07-242350
 1MC04-SCJ-EV-DSE-SS05_SL07-242700
 1MC04-SCJ-EV-DSE-SS05_SL07-242701
 1MC04-SCJ-EV-DSE-SS05_SL07-242219
 1MC04-SCJ-EV-DSE-SS05_SL07-242230
 1MC04-SCJ-EV-DSE-SS05_SL07-242240
 Covering Letter(1)

Date Plans Received: 19/10/2020

Date(s) of Amendment(s):

Date Application Valid: 11/11/2020

1. SUMMARY

Planning permission is sought for the remodelling of Ruislip Golf Course, incorporating: reconfiguration of 18 existing hole course into a nine hole course, short game practice area, putting green and six hole academy course; construction of a single storey rifle range; demolition of existing covered driving bays and construction of replacement driving range, including associated floodlights and safety netting; a new drainage system and

associated ponds; ecological and landscaping works; realignment and enhancement of the Hillingdon Trail and creation of a new public footpath; excavation of a new channel for the Ickenham Stream (canal feeder); and other associated works.

Construction of HS2 will result in land take from Ruislip Golf Course. The applicant has committed to designing and delivering a reconfigured golf course and replacement rifle range facility as part of a number of Undertakings and Assurances (U&A) that were agreed with LB Hillingdon (and which eventually formed part of the Hillingdon Agreement) during the passage of the Hybrid Bill through parliament.

13 individual letters of objection and 2 in support have been received,

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. Of all the uses proposed as part of this application, the one that risks being considered "inappropriate" is the erection of the new rifle range building. However, it is considered that robust 'very special circumstances' have been established to allow the replacement rifle range in this Green Belt location. Overall, it is considered that the proposal complies in general with the key theme contained within the NPPF, Local Plan 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 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.

The design and layout of the new 8 hole golf course, which comprises undulating topography and associated landscape, has been designed in consultation with the Council's Green Spaces and golf course managers and is considered acceptable.

The new design for the golf course results in some cut and fill across the site. In general levels rise and there is a deficit of 50,000m³ of material to achieve the design ambition. As part of the HS2 works, the West Ruislip Portal will be built adjacent to the site. Construction of the Portal will generate a considerable quantity of excavated material, mostly natural ground. This material will be used on the golf course. It is proposed that the excavated material are reused using the CL:AIRE Definition of Waste Code of Practice under a full Materials Management Plan, in accordance with the HS2 Materials Management Plan Framework. This approach has been agreed with the Environment Agency (EA). As such, the application is considered a non waste development and the Mayor of London does not therefore need to be consulted as a waste application.

The application has demonstrated that the proposed development could be completed without detriment to the recognised ecological value of this area, The application has also addressed issues with respect to the impact of the development on populations of water voles and great crested newts.

It is considered unlikely that the proposals would lead to conditions detrimental to road safety or to traffic congestion on the local road network.

Issues relating to archaeology, contamination, residential amenity, the safe operation of Network Rail can be satisfactorily addressed by the imposition of appropriately worded

conditions.

The proposed development is in accordance with the policies of the development plan and it is considered that planning permission should be granted, subject to conditions and a S106 Agreement..

2. RECOMMENDATION

That delegated powers be given to the Deputy Director of Planning and Regeneration to GRANT planning permission, subject to the following:

A) That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) to secure the following Heads of Terms:

i) A financial contribution for the long term maintenance and annual assessment in connection with the creation of a pond on the western area of the Golf Course that will accommodate great crested newts under licence from Natural England (sum to be tabled via the committee addendum).

ii) Project Management & Monitoring Fee: a contribution equal to 5% of the total cash contributions secured from the scheme to enable the management and monitoring of the resulting agreement.

B) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 Agreement and any abortive work as a result of the agreement not being completed.

C) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.

D) That, if the Legal Agreement has not been finalised within 6 months (or such other time frame as may be agreed by the Deputy Director of Planning and Regeneration), delegated authority be given to the Deputy Director of Planning and Regeneration to refuse planning permission for the following reason:

'The applicant has failed to provide measures to mitigate the impacts of the development through enhancements to services and the environment necessary as a consequence of demands created by the proposed development (in respect of biodiversity). The scheme therefore conflicts with Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020); the adopted Planning Obligations Supplementary Planning Document (2014); Policy DF1 of the London Plan (2021); and paragraphs 55-58 of the National Planning Policy Framework (2021).'

E) That if the application is approved, the following conditions be imposed:

1 COM3 Time Limit

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

2 COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

1MC04-SCJ_SDH-DR-DDE-SS05_SL07-564501

1MC04-SCJ_SDH-DR-DDE-SS05_SL07-564502 Drainage

1MC04-SCJ_SDH-DR-DDE-SS05_SL07-564503 Drainage

1MC04-SCJ_SDH-DR-DPL-SS05_SL07-561101 Drainage Plan

1MC04-SCJ_SDH-DR-DPL-SS05_SL07-561102 Drainage Plan1
 1MC04-SCJ_SDH-DR-DPL-SS05_SL07-561103 Drainage Plan1
 1MC04-SCJ_SDH-DR-DSE-SS05_SL07-562251 & 2 Drainage Sections
 1MC04-SCJ-EV-DPL-SS05_SL07-241000 CO3
 1MC04-SCJ-EV-DGA-SS05_SL07-240400 CO3
 1MC04-SCJ-DR-DPL-SS05_SL07-241001(2) CO3
 1MC04-SCJ-DR-DPL-SS05_SL07-241002(2) CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241001 CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241100 CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241150 CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241200 CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241110 CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241500(1) CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241210 CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241501(2) CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241300 CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241550(1) CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241600(1) CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241610(1) CO3
 1MC04-SCJ-EV-DSE-SS05_SL07-242200(1) CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241503(2) CO3
 1MC04-SCJ-EV-DPL-SS05_SL07-241502(1) CO3
 1MC04-SCJ-EV-DSE-SS05_SL07-242212 CO2
 1MC04-SCJ-EV-DSE-SS05_SL07-242213 CO2
 1MC04-SCJ-EV-DSE-SS05_SL07-242210(1) CO3
 1MC04-SCJ-EV-DSE-SS05_SL07-242211(1) CO2
 1MC04-SCJ-EV-DSE-SS05_SL07-242217 CO2
 1MC04-SCJ-EV-DSE-SS05_SL07-242218 CO2
 1MC04-SCJ-EV-DSE-SS05_SL07-242214 CO2
 1MC04-SCJ-EV-DSE-SS05_SL07-242215 CO2
 1MC04-SCJ-EV-DSE-SS05_SL07-242216 CO2
 1MC04-SCJ-EV-DSE-SS05_SL07-242350 CO3
 1MC04-SCJ-EV-DSE-SS05_SL07-242700 CO3
 1MC04-SCJ-EV-DSE-SS05_SL07-242701 CO3
 1MC04-SCJ-EV-DSE-SS05_SL07-242219 CO2
 1MC04-SCJ-EV-DSE-SS05_SL07-242230 CO3
 1MC04-SCJ-EV-DSE-SS05_SL07-242240 CO3

and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

3 COM5 General compliance with supporting documentation

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

1EW02-CSJ-EV-REP-S002-000148 C02 Archaeological Assessment
 HS2 London-West Midlands Code of Construction Practice (CoCP)
 1MC04-SCJ-PL-STA-SS05_SL07-000001 Planning Statement

1MC04-SCJ-PL-STA-SS05_SL07-000002 Design and Access Statement (DAS)
 1MC04-SCJ-EV-STA-SS05_SL07-000002 Ecological Impact Assessment (EclA)
 1MC04-SCJ-SDH-EV-REP-SS05-SL07-000007 Species Report
 1MC04-SCJ-SDH-EV-REP-SS05-SL07-000006 Preliminary Ecological Appraisal
 1MC04-SCJ-EV-REP-SS05_SL07-000008 Archaeological Desk Based Assessment
 1MC04-SCJ-EV-REP-SS05_SL07-000006 Geoenvironmental Desktop Study Report
 1MC04-SCJ-DR-ASM-SS05_SL07-000001 Flood Risk Assessment (FRA)
 1MC04-SCJ-DR-ASM-SS05_SL07-000001_C06 FRA Oct 21
 1MC04-SCJ-DR-REP-SS05_SL07-000003_C06 Drainage report
 1MC04-SCJ-DR-REP-SS05_SL07-000003 Drainage Report
 1MC04-SDH-EV-REP-SS05_SL07-000001_C01 Flood Level Analysis
 1MC04-SCJ-OM-PLN-SS05_SL07-000001 Management and Maintenance Plan
 1MC04-SCJ-TM-STA-SS05_SL07-000001 Transport Statement
 1MC03-SCJ-EN-ASM-SS05_SL07-000001 Noise Impact Assessment
 1MC04-SCJ_SDH-EV-PLN-SS05_SL07-000001 Outline Materials Management Plan
 1MC04-SCJ-EV-REP-SS05_SL07-000009 Arboricultural Survey Report

REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

4 COM8 Tree Protection

No site clearance or construction work (excluding the great crested newt pond) shall take place until the details have been submitted to, and approved in writing by, the Local Planning Authority with respect to:

1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.
2. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority such fencing should be a minimum height of 1.5 metres.
3. A final Arboricultural Method Statement, Construction Method Statement and Construction Environment Management Plan, to include a programme of work, tree protection measures, site organization / management and quality controls (to include safe / separate vehicle and pedestrian access) shall be submitted to and approved by the LPA, prior to commencement of the development hereby approved..

Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted to the Local Planning Authority.

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed.

The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:

- 2.a There shall be no changes in ground levels;

- 2.b No materials or plant shall be stored;
- 2.c No buildings or temporary buildings shall be erected or stationed.
- 2.d No materials or waste shall be burnt; and.
- 2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

REASON

- i) To safeguard the amenity of surrounding properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020); and ii) To protect the ecological value of the area in accordance with Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020).
- iii) To ensure pedestrian and vehicular safety and convenience and to ensure adequate off-street parking, and loading facilities in compliance with policies DMT 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and policies T6 and T7 of the London Plan (2021).
- iv) To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policy G7 of the London Plan (2021).
- v) To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020).

5 COM9 Landscaping (car parking & refuse/cycle storage)

No development hereby approved shall commence (excluding the great crested newt pond) until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

- 1. Details of Soft Landscaping
 - 1.a Planting plans (at not less than a scale of 1:100),
 - 1.b Written specification of planting and cultivation works to be undertaken,
 - 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate
- 2. Details of Hard Landscaping
 - 2.a Refuse Storage
 - 2.b Cycle Storage
 - 2.c Means of enclosure/boundary treatments
 - 2.d Car Parking Layouts for 160 vehicles (including 16 disabled parking bays and demonstration that 8 parking spaces are served by electrical charging points)
 - 2.e Hard Surfacing Materials (including resurfacing and realignment of public rights of way)
 - 2.f External Lighting
 - 2.g Other structures (such as play equipment and furniture)
- 3. Details of Landscape Maintenance
 - 3.a Landscape Maintenance Schedule for a minimum period of 5 years.
 - 3.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.
- 4. Schedule for Implementation
- 6. Other
 - 6.a Existing and proposed functional services above and below ground

6.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020). and London Plan Policies G7 and G8 (2021).

6 NONSC Soil Management

The development hereby approved, other than the Great Crested Newt (GCN) pond in the Northwest corner of the Golf Course identified on drawing nos. 1MC04-SCJ-EV-DSE-SS05_SL07-242700 Rev CO3 and 1MC04-SCJ-EV-DSE-SS05_SL07-242701 Rev CO3, shall not begin until a soils management plan (SMP) has been submitted to and approved in writing by the Local Planning Authority. The SMP shall include details of sub-soil and top-soil storage, handling and formation.

The development shall be carried out and maintained in full accordance with the approved details.

REASON

- (i) In order to comply with the terms of the application
- (ii) To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development on Land Affected by Contamination.
- (iii) To safeguard the amenity of the surrounding area in accordance with policy EM8 of the Hillingdon Local Plan Part 1 (2012) and policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

7 NONSC Archaeology

No demolition or development shall take place other than the Great Crested Newt (GCN) pond in the Northwest corner of the Golf Course identified on drawing nos. 1MC04-SCJ-EV-DSE-SS05_SL07-242700 Rev CO3 and 1MC04-SCJ-EV-DSE-SS05_SL07-242701 Rev CO3, until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing in consultation with GLAAS. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Details of a programme for delivering related positive public benefits
- C. Details of measures to protect areas identified for preservation in-situ during construction
- D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the

programme set out in the WSI.

REASON

To ensure that there will be no, or very limited, impacts to heritage assets as a result of the proposed development and that the proposals do not conflict with policy DMHB 1 and DMEI 6 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020), Policy HE1 of the Local Plan Part 1 (2012) and Policy HC1 of the London Plan (2021).

8 COM29 No floodlighting

No floodlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. Such details shall include location, height, type and direction of light sources and intensity of illumination. Any lighting that is so installed shall not thereafter be altered other than for routine maintenance which does not change its details.

REASON

To safeguard the amenity of surrounding properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020); and To protect the ecological value of the area in accordance with Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020).

9 COM22 Operating Hours

The rifle range shall not be used except between:-
[08.00 and 18.00], Mondays - Fridays
[0800 to 13.00] Saturdays
and at no time on Sundays, Public or Bank Holidays.

REASON

In order to comply with the terms of the application and to safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

10 NONSC Ecology - Water Vole

The water vole is fully protected under Schedule 5 of the Wildlife & Countryside Act 1981 and is a priority conservation species. It may be present at the proposed development site.

No development hereby approved shall commence (excluding the great crested newt pond) until an updated survey is carried out to identify the presence of water vole. If water vole are found to be present, a plan detailing their protection shall be submitted to and agreed in writing with the Local Planning Authority. The plan must consider the whole duration of the development, from the construction phase through to development completion. Any change to operational responsibilities, including management, shall be submitted to and approved in writing by the local planning authority in consultation with the Environment Agency. The water vole protection plan shall be carried out in accordance with a timetable for implementation as approved.

REASON

To protect the water vole and its habitat within the development site, and to avoid damaging the site's nature conservation value.

To comply with Policy EM7 of the adopted Hillingdon Local Plan: Part 1 (2012), policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020), and London Plan Policy G6 (2021).

11 NONSC Contamination Risks

Prior to each phase of development approved by this planning permission other than the Great Crested Newt (GCN) pond in the Northwest corner of the Golf Course, identified on drawing nos. 1MC04-SCJ-EV-DSE-SS05_SL07-242700 Rev CO3 and 1MC04-SCJ-EV-DSE-SS05_SL07-242701 Rev CO3, no development shall commence until a strategy to deal with the risks associated with contamination of the site has been submitted to, and approved in writing by the Local Planning Authority in consultation with the Environment Agency. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
 - all previous uses and proposed uses including the cut and fill, importation of additional fill materials (e.g. elevated naturally occurring contaminants associated with London Clay and Lambeth group);
 - a conceptual model of the site indicating sources, pathways and receptors; and drainage and foundations designs
 - potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation and mitigation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

REASON

To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution in line with paragraph 183 of the National Planning Policy Framework and Position Statement F1 Non-landfill waste activities of the 'The Environment Agency's approach to groundwater protection.

- To prevent further deterioration of a water quality element to a lower status class and prevent the recovery of a drinking water protected area. The submitted Geoenvironmental report documents the previous uses of the 'site' and immediate surrounding however an assessment of risks to the water environment from the proposed importation of excavated arisings onto the receiver site is not included within this suite of application documents.

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development on Land Affected by Contamination.

12 NONSC Contamination Monitoring

The development hereby permitted may not commence, other than the Great Crested Newt (GCN) pond in the Northwest corner of the Golf Course, Identified on drawing nos. 1MC04-SCJ-EV-DSE-SS05_SL07-242700 Rev CO3 and 1MC04-SCJ-EV-DSE-SS05_SL07-242701 Rev CO3, until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority in consultation with the Environment Agency. Reports as specified in the

approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority

REASON

- To ensure that the site does not pose any further risk to human health or the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with the National Planning Policy Framework.
- To prevent further deterioration of a water quality element to a lower status class and prevent the recovery of a drinking water protected area.
- To comply with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development on Land Affected by Contamination, policy EM8 of the Hillingdon Local Plan Part 1 (2012). and policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

13 NONSC Contamination Remediation

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 a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority in consultation with the Environment Agency. The remediation strategy shall be implemented as approved.

REASON

- To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 170 of the National Planning Policy Framework.
- To prevent further deterioration of a water quality element to a lower status class and prevent the recovery of a drinking water protected area.
- No investigation can completely characterise a site. The condition may be appropriate where some parts of the site are less well characterised than others, or in areas where contamination was not expected and therefore not included in the original remediation proposals.
- To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development on Land Affected by Contamination.

14 NONSC Bore Holes 1

Piling and investigation boreholes using penetrative methods shall not be carried out other than with the written consent of the local planning authority in consultation with the Environment Agency. The development shall be carried out in accordance with the approved details.

REASON

- To ensure that the proposed piling and foundations does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework and the Environment Agency's approach to groundwater protection, February 2018 Version 1.2 <https://www.gov.uk/government/publications/groundwater-protection-position-statements>
- Some piling techniques can cause preferential pathways for contaminants to migrate to

groundwater and cause pollution. A piling risk assessment and appropriate mitigation measures should be submitted with consideration of the EA guidance. During piling works (especially if the piles extend to the Chalk within SPZ1 saturated zone) due to the proximity of nearby potable abstractions the weekly groundwater monitoring for insitu parameters and turbidity should be considered.

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0202bisw-e-e.pdf> Decommission of investigative boreholes

- The submitted planning application indicates that boreholes will need to be installed at the development site to investigate groundwater resources / carry out soakage tests. If these boreholes are not decommissioned correctly they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 1.

- To comply with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development on Land Affected by Contamination, policy EM8 of the Hillingdon Local Plan Part 1 (2012). and policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

15 NONSC Bore holes 2

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority in consultation with the Environment Agency. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development / or of each phase of development.

REASON

- To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 183 of the National Planning Policy Framework and The Environment Agency's Approach to Groundwater Protection February 2018 Version 1.2 <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Link to archived EA guidance:
https://webarchive.nationalarchives.gov.uk/20140328154120/http://cdn.environment-agency.gov.uk/LIT_6478_8cbe6f.pdf

- To comply with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development on Land Affected by Contamination, policy EM8 of the Hillingdon Local Plan Part 1 (2012). and policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

16 NONSC Network Rail

No development hereby approved shall commence (excluding the great crested newt pond) until details of the disposal of both surface water and foul water drainage directed away from the railway shall be submitted to the Local Planning Authority and Network Rail."

REASON

To protect the adjacent railway from the risk of flooding, soil slippage and pollution.

To comply with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development on Land Affected by Contamination, DMT 1, policy EM8 of the Hillingdon Local Plan Part 1 (2012).

17 NONSC Network Rail 2

No development hereby approved shall commence (excluding the great crested newt pond) until full details of ground levels, earthworks and excavations to be carried out near to the railway boundary and a method statement and risk assessment shall be submitted to and approved in writing by the Local Planning Authority in consultation with Network Rail.

REASON

: To ensure that the construction and subsequent maintenance of the proposal can be carried out without adversely affecting the safety, operational needs or integrity of the railway.

To comply with Policy DMT1 of the Hillingdon Local Plan: Part 2 (January 2020).

18 NONSC Traffic Management Plan

Prior to the use of the roads which are the subject of this application, the applicant shall submit a traffic management plan specific to the proposed works which should be agreed in writing with the LPA. This plan should indicate the measures to reduce the impacts on peak hour traffic (0730-0930 and 1630-1830) and include workforce numbers with activity profiles, details of access and egress management at the site, and general traffic management arrangements. The operation of the roads must proceed in accordance with the traffic management plan together with a comprehensive Highway network monitoring regime applied throughout the period of works.

REASON

To ensure pedestrian and vehicular safety and convenience and to ensure adequate off-street parking, and loading facilities in compliance with Policies DMT 2 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and policies T6 and T7 of the London Plan (2021).

19 NONSC Road Safety Audit

Prior to commencement of the development hereby approved (excluding the great crested newt pond), a 3-stage road safety audit (RSA-stages 2,3 and 4) shall be undertaken at Clacks Lane and its junction with Ickenham Road, in order to take stock of the existing arrangement with identification of any layout and/or safety enhancements that can be introduced prior to or post-construction. This exercise would also be pertinent to construction vehicle activity in this vicinity and shall be submitted to and approved in writing and any recommendations and mitigation implemented thereafter.

REASON

To ensure pedestrian and vehicular safety and convenience and to ensure adequate off-street parking, and loading facilities in compliance with Policies DMT 2 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and policies T6 and T7 of the London Plan (2021).

20 NONSC No Contaminated Soils

No contaminated soils or other materials shall be imported to the site; All imported soils for engineering/ landscaping purposes shall be clean and free of contamination. Before any part of the site is occupied all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted in the form of a suitable validation and verification report for approval in writing by the Local Planning Authority.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable

risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

21 NONSC Noise 1

The development shall be constructed and operated as per the details in the Noise Impact Assessment report for Ruislip Golf Course London S2 (Document no.1MC04-SCJ-EN-ASM-SS05_SL07-000001, Revision C03, dated 28/10/2019), with any relevant features thereafter retained and maintained in good working order for so long as the building remains in use.

REASON

- To ensure an acceptable development;
- To safeguard the amenity of the surrounding area in accordance with policy EM8 of the Hillingdon Local Plan Part 1 (2012 policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020) and Policy D14 of the London Plan (2021).

22 NONSC Noise 2

Any source of plant noise associated with the operation of the development, at the point of emission to the atmosphere, should be limited to a sound power level of no more than 75 dBA, and where the cumulative plant noise should be no higher than 35 dB LAeq,1h 1 m outside the nearest residential premises. The equipment shall be maintained in good working order for so long as the building remains in use.

REASON

- To ensure an acceptable development;
- To safeguard the amenity of the surrounding area in accordance with policy EM8 of the Hillingdon Local Plan Part 1 (2012 policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020) and Policy D14 of the London Plan (2021).

23 COM15 Sustainable Water Management

No development hereby approved shall commence (excluding the great crested newt pond) until an updated drainage strategy for the provision of sustainable water management has been submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate that sustainable drainage systems (SUDS) have been incorporated into the designs of the development in accordance with the hierarchy set out in accordance with Policy SI15 of the London Plan and will:

- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation; and
- iii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:

- iv. provide details of water collection facilities to capture excess rainwater;
- v. provide details of how rain and grey water will be recycled and reused in the development.

Thereafter the development shall proceed in accordance with the approved scheme.

REASON

There are a number of aspects of the drainage proposal which do not meet best practice and will result in significant maintenance as well as opportunities to make best use of golf course to collect and store water as well as slow the flow. To ensure the development does not increase the risk of flooding in accordance with Policy DMEI 10 of the Hillingdon Local Plan Part 2 (2020) and London Plan (2021) Policy SI15

INFORMATIVES

1 I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021).

DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMHB 1	Heritage Assets
DMHB 14	Trees and Landscaping
DMT 1	Managing Transport Impacts
DMEI 9	Management of Flood Risk
DMT 2	Highways Impacts
LPP D8	(2021) Public realm
LPP G1	(2021) Green infrastructure
LPP G2	(2021) London's Green Belt
LPP G4	(2021) Open space
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP G9	(2021) Geodiversity
LPP HC1	(2021) Heritage conservation and growth
LPP HC7	(2021) Protecting public houses
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI5	(2021) Water infrastructure
LPP T4	(2021) Assessing and mitigating transport impacts
NPPF	National Planning Policy Framework

2 I52 Compulsory Informative (1)

The decision to GRANT 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).

3

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence

(including a remote defence) or culvert
· in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

4

Abstraction of water - Water Resources Act 1991

Ruislip Golf Club previously used a Chalk borehole at NGR TQ 0844 8691 to meet the irrigation needs of the golf course. The Environment Agency had not issued a licence to abstract water to authorise this use of water. The re-design of the golf course provides an opportunity to confirm the irrigation needs and the source of water to be used. The legislation requires that where water is abstracted from either a surface water or groundwater source that a licence to abstract water can be required. The developer is advised to contact the Environment Agency to discuss their water requirements which with careful planning could be incorporated into the re-designed layout of the course

5

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

6 I14 Installation of Plant and Machinery

The Council's Commercial Premises Section and Building Control Services should be consulted regarding any of the following:-

The installation of a boiler with a rating of 55,000 - 1 million Btu/hr and/or the construction of a chimney serving a furnace with a minimum rating of 1 million Btu/hr;

The siting of any external machinery (eg air conditioning);

The installation of additional plant/machinery or replacement of existing machinery.

Contact:- Commercial Premises Section, 4W/04, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250190). Building Control Services, 3N/01, Civic Centre, High Street, Uxbridge, UB8 1UW (tel. 01895 250804 / 805 / 808).

7

The archaeological written scheme of investigation (WSI) will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their

reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

GLAAS envisage that the archaeological fieldwork would comprise the following:

Evaluation

Archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Here excavation of trial trenches will be needed in areas where groundworks are proposed but have not already evaluated in this way. The field evaluation report will be used to inform a subsequent stage of mitigation if significant remains are found.

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving. Excavation will be necessary for those areas of significant remains already discovered plus any further discoveries from completion of the evaluation.

Preservation in-situ

Where archaeological remains are to be preserved in-situ within a development there will be a requirement to provide details of how this will be achieved. Typically this would involve a design and methods statement for groundworks.

Public benefit

Historic England's Greater London Archaeology Standards Paper 5 provides guidance on popular dissemination and communication. We recommend that the proposals identify audiences, messages and modes of engagement to demonstrate that the proposals will reach and benefit local communities.

8

Model Procedures and good practice

The Environment Agency (EA) recommends that developers should:

1. Follow the risk management framework provided in the updated guide is called Land contamination: risk management (LCRM), when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed. <https://www.claire.co.uk/projects-and-initiatives/nqms-sqp-register> The Planning Practice Guidance defines a "Competent Person (to prepare site investigation information): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation."

(<http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/>)"

4. Refer to the contaminated land pages on GOV.UK for more information.

5. We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by land contamination. e.g. British Standards when investigating potentially contaminated sites and groundwater, and references with these documents and their subsequent updates:

- BS5930:2015 Code of practice for site investigations;
- BS 10175:2011 A2:2017 Code of practice for investigation of potentially contaminated sites;
- BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;
- BS ISO 5667-11:2009, BS 6068- 6.11: 2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns but more may be required to establish the conceptual site model and groundwater quality. See RTM 2006 and MNA guidance for further details).
- BS ISO 18512:2007 Soil Quality. Guidance on long-term and short-term storage of soil samples
- BS EN ISO 5667:3- 2018. Water quality. Sampling. Preservation and handling of water samples
- Use MCERTS accredited methods for testing contaminated soils at the site.
- Guidance on the design and installation of groundwater quality monitoring points Environment Agency 2006 Science Report SC020093 NB. The screen should be located such that at least part of the screen remains within the saturated zone during the period of monitoring, given the likely annual fluctuation in the water table. In layered aquifer systems, the response zone should be of an appropriate length to prevent connection between different aquifer layers within the system.

A Detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out. This increased provision of information by the applicant reflects the potentially greater risk to the water environment. The DQRA report should be prepared by a "Competent person" E.g. a suitably qualified hydrogeologist. <https://sobra.org.uk/accreditation/register-of-sobra-risk-assessors/> In the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment.

· GP3 version 1.1 August 2013 provided further guidance on setting compliance points in DQRAs. This is now available as online guidance: <https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments>

· Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50m.

· For the purposes of our Approach to Groundwater Protection, the following default position applies, unless there is site specific information to the contrary: we will use the more sensitive of the two designations E.g. if secondary drift overlies principal bedrock, we will adopt an overall designation of principal.

Where leaching tests are used it is strongly recommended that BS ISO 18772:2008 is followed as a logical process to aid the selection and justification of appropriate tests based on a conceptual understanding of soil and contaminant properties, likely and worst-case exposure conditions, leaching mechanisms, and study objectives. During risk assessment one should characterise the leaching behaviour of contaminated soils using an appropriate suite of tests. As a minimum these tests should be:

- upflow percolation column test, run to LS 2 - to derive kappa values;
- pH dependence test if pH shifts are realistically predicted with regard to soil properties and exposure scenario; and
- LS 2 batch test - to benchmark results of a simple compliance test against the final step of the column test.

Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance updated guide is called Land contamination: risk management (LCRM).

The verification plan should include proposals for a groundwater-monitoring programme to encompass regular monitoring for a period before, during and after ground works. E.g. monthly monitoring before, during and for at least the first quarter after completion of ground works, and then quarterly for the remaining 9-month period.) The verification report should be undertaken in accordance with in our guidance Verification of Remediation of Land Contamination <http://publications.environment-agency.gov.uk/pdf/SCHO0210BRXF-e-e.pdf>

1. Where SUDs are proposed; infiltration SUDs should not be located in unsuitable and unstable ground conditions such as land affected by contamination or solution features. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater. For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit. Further advice is available in the updated CIRIA SUDs manual http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx USTs

2. The Environment Agency recommends the removal of all underground storage tanks (USTs) that are unlikely to be reused. Once the tanks and associated pipelines have been removed, samples of soil and groundwater should be taken to check for subsurface contamination. If soil or groundwater contamination is found, additional investigations (possibly including a risk assessment) should be carried out to determine the need for remediation. Refer to 'Pollution Prevention Advice and Guidance on Storing and handling materials and products' <https://www.gov.uk/government/publications/underground-storage-tanks-ppg27-prevent-pollution> and 'Defra - The Groundwater Protection Code: Petrol stations and other fuel dispensing facilities involving underground storage tanks - for England and Wales' <http://archive.defra.gov.uk/environment/quality/water/waterquality/ground/documents/groundwater-petrol.pdf> specifically those sections relating to decommissioning redundant underground fuel storage tanks and infrastructure.

9

The Environment Agency (EA) has confirmed that it has no objections for the reuse of excavated material as non-waste under the CL:AIRE Definition of Waste Code of Practice (DoWCoP), as outlined in the submitted Interim/Outline Materials Management Plan (MMP) for the proposed works at Ruislip Golf Course, and supporting information, providing that the CL:AIRE Definition of Waste Code of Practice is followed in full. As such, the application is considered a non waste development.

A formal Declaration must be submitted to the EA by a QP before any transfer occurs. The decision to use the CL:AIRE Definition of waste Code of Practice is the responsibility of the holder of the materials. The project manager should collate all relevant documents; permissions, site reports, MMP etc and consult with an independent QP to confirm that the site meets the requirements and tests for use of the DOWCOP.

If the site meets the tests that materials are suitable for re-use, certain to be re-used, are not excessive in volume and pose no risk to the environment or harm to human health then the QP can make a formal Declaration via CL:AIRE.

A verification report is required to be completed at the end of the project and a copy submitted to CLAIRE. Materials not used in accordance with the DoWCoP process in full may be deemed waste and will require a relevant permit for deposit. Materials illegally deposited or deposited at inappropriate sites may be subject to relevant landfill taxes, payable by all parties. Only robust due diligence is a defense against joint liability.

10

The Council's landscape architect and tree manager should be consulted prior to the commencement of work on site, or should any landscape, or tree-related matters arise during the life of the project (email: trees@hillingdon.gov.uk)

3. CONSIDERATIONS

3.1 Site and Locality

Ruislip Golf Course is a municipal golf course, owned and operated by the London Borough of Hillingdon. It falls partially within the alignment of the HS2 development. The High Speed Rail (London-West Midlands) Act 2017 (the HS2 Act), which gained Royal Assent in February 2017, conferred the necessary powers required to construct Phase One of the railway from London Euston to Birmingham Curzon Street. The southern part of Ruislip Golf Course falls within this boundary.

Ruislip Golf Course covers an area of approximately 42 hectares . The application site comprises the majority of the existing, albeit now closed, golf course, the area of which is 36 hectares. This area excludes the southern part of Ruislip Golf Course, which will be acquired as part of the HS2 works. The remaining six hectares of the Golf Course that are excluded from this application will be acquired and used for permanent elements of the HS2 railway.

It is located to the north of West Ruislip Station, and is bounded: to the north and north-east by the Glenhurst Avenue allotments and Hill Lane playground and the rear curtilages of residential properties on Field Way and Hill Rise; to the east and south-east by the rear curtilages of residential properties on Sharps Lane, Ickenham Road and Harwell Close; to the south-west and the far south-east by the boundary of the HS2 development; and to the west and north-west by the River Pinn.

A 40-bay driving range comprising a total footprint of 676.5sqm is located in the south-east corner of the application site. This comprises a 55m wide single storey structure, flat grassed outfield with distance marker, dummy holes and floodlights (which are also located on the roof of the range). 20m high safety netting surrounds the outfield.

Whilst closed as of August 2019 to facilitate HS2 works to the south, the original golf course was 5,049m in length and comprised 18 holes. Prior to its closure, it was characterised by open fairways bounded by rough grassland and mature tree belts, some of which also had understorey vegetation which provided visual separation between the holes. The Ickenham Stream, which connects into the River Pinn to the north, crosses the course on a north/south axis (intersecting the 5th, 10th and 15th holes). This, in turn, connects into a series of artificial drainage channels which permeate the course. Where

these channels cross playable parts of the course, they are either culverted under the fairways or crossed by small wooden bridges

Clacks Lane forms a vegetated corridor which passes through the northern part of the application site. To the east, this comprises a paved access road, connecting northwards into Hill Lane. Further west, it transitions into an unsurfaced public footpath, crossing the River Pinn and connecting into the wider network of public footpaths that permeate the site. It separates the existing 5th to 9th holes from the southern part of the course. The Hillingdon Trail (footpath U81), an unsurfaced path marked by trail markers, crosses the course in approximately the same alignment as the Ickenham Stream; though this Public Right of Way (PRoW) will be temporarily diverted away from this alignment during construction of the proposed Hs2 scheme. This PRoW will also require a permanent diversion as a result of HS2 works.

The primary access to the site is via an access road off Clacks Lane in the eastern part of the course. An alternative pedestrian access is provided by a staircase from Ickenham Road, which at this point is on a raised flyover over the Chiltern Mainline, in the south-eastern corner of the application site.

A club house building, is located in the south-eastern part of the Golf Course outside of the application site. This building comprises the Fairway public house (operated by Greene King), changing rooms, golf equipment shop and trolley hire. A surfaced car park approximately 3,736sqm in size is located to the north of the club house and is included within the application boundary. It should be noted that whilst the golf course itself is now closed, this building remains open and operational.

Also outside the application site to the south east within close proximity to the railway was the original rifle range building. A low, single storey structure, this comprised the rifle range, office, storage, and ancillary meeting room and kitchen - total floorspace of 207.3sqm. The use of this building has however now terminated with the building itself recently demolished to facilitate ongoing HS2 groundworks.

3.2 Proposed Scheme

This application is for the redevelopment of the existing 18 hole Ruislip Golf Course to provide a nine hole golf course and six hole academy course, the creation of a new channel for the Ickenham Stream (canal feeder), the demolition and replacement of the driving range with a new 20 bay driving range, including associated floodlights and safety netting; and the construction of a replacement rifle range building.

In addition, the development proposals include:

- > A short game practice area,
- > A new drainage system and associated ponds;
- > Ecological and landscaping works;
- > Realignment and enhancement of the Hillingdon Trail and creation of a new public footpath;
- > Excavation of a new channel for the Ickenham Stream (canal feeder); and other associated works.

A suite of documents have been submitted in support of the application:

Planning Statement

Includes project description, site description, project rationale, assessment of how the development complies with local, regional and national planning policy, summary of consultation undertaken, and description of other documents which constitute the application

Design and Access Statement (DAS)

Includes design principles and concept, description of the proposed development, context appraisal and approach to access.

Ecological Impact Assessment (EclA)

Includes current ecological constraints, a preliminary ecological appraisal and details of how construction and operation will seek to protect existing ecology.

Archaeological Desk Based Assessment

An assessment of the archaeological potential of the application site and potential impacts of the proposed development

Geoenvironmental Desktop Study Report

An assessment of the ground conditions in relation to the proposed development

Flood Risk Assessment (FRA)

Sets out relevant information relating to flood risk on the application site and demonstrates how any risks have been mitigated

Drainage Report

Describes the surface water drainage strategy

Management and Maintenance Plan

Sets out how the how elements relating to the golf course operation (greens, tees and fairways) and elements relating to the landscape / ecological habitats will be managed and maintained.

Transport Statement

Describes the proposed highway and access arrangements relating to the proposed development, during both construction and operation, considers the impact of the proposals on the local transport network and outlines measures necessary to address any impacts

Noise Impact Assessment

Establishes the effect of the proposed development on noise levels in the surrounding area.

Outline Materials Management Plan

Describes the approach to importing materials to the site, providing sufficient information to satisfy CL:AIRE DoWCoP.

Arboricultural Survey Report

Produced in compliance with National Code of Practice: BS5837:2012 Trees in relation to design, demolition and construction - Recommendations. Includes a tree survey and arboricultural assessment.

Time frame

The construction of the golf course will take approximately 18 months, followed by an 18 month re-establishment period. This duration is typical of a golf course of this size. The overall duration of closure is dictated by the timing and speed of the construction of HS2 because the course will close when this is commenced, and remodelling of the course will commence when material from the Portal is available to be reused on site.

Environment Impact Assessment (EIA)

On 12th October 2018 an EIA Screening Request was submitted to the Council for its consideration, with the Council issuing their Screening Opinion on 16th November 2018, where it was acknowledged the scheme will not give rise to likely significant effects.

3.3 Relevant Planning History

Comment on Relevant Planning History

The application site was previously in agricultural use, split across a series of farmsteads: Beetonswood Farm, Hill Farm and Kingsend Farm. However, following the opening of the Metropolitan Railway station at Ruislip at the turn of the century, the landowners Kings College Cambridge held a town planning competition to establish development plots around Ruislip and Ruislip Manor.

As a result of the rapid urbanisation of the area, a municipal golf course was commissioned by the Ruislip-Northwood Urban District. Designed by 1902 Open Champion golfer Alexander (Sandy) Herd, the course was laid out and opened in 1936.

Ruislip Rifle Club, which was founded as a Home Guard Rifle Club in 1944, has been located on the golf course since 1959. The present rifle range structure, located to the south-west of the application site, was erected in 1969 after the previous range was destroyed by a fire.

The powers necessary for construction and operation of HS2 Phase One of the proposed scheme from London Euston to Birmingham Curzon Street were conferred in the HS2 Act. The Act also included provision for the compulsory acquisition of land within the boundaries established through the Act, which included part of Ruislip Golf Course.

Powers to undertake development at Ruislip Golf Course were not conferred through the HS2 Act and therefore must be sought through a Town and Country Planning Act 1990 application. This application seeks full planning permission for the works required.

4. Planning Policies and Standards

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)

The West London Waste Plan (2015)

The London Plan (2021)

Material Considerations

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in

planning decisions, as well as relevant supplementary planning documents and guidance.

UDP / LDF Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise

Part 2 Policies:

DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMHB 1	Heritage Assets
DMHB 14	Trees and Landscaping
DMT 1	Managing Transport Impacts
DMEI 9	Management of Flood Risk
DMT 2	Highways Impacts
LPP D8	(2021) Public realm
LPP G1	(2021) Green infrastructure
LPP G2	(2021) London's Green Belt
LPP G4	(2021) Open space
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP G9	(2021) Geodiversity
LPP HC1	(2021) Heritage conservation and growth
LPP HC7	(2021) Protecting public houses
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI5	(2021) Water infrastructure
LPP T4	(2021) Assessing and mitigating transport impacts
NPPF	National Planning Policy Framework

5. Advertisement and Site Notice

- 5.1** Advertisement Expiry Date:- **16th December 2020**
- 5.2** Site Notice Expiry Date:- Not applicable

16th December 2020

3rd December 2020

6. Consultations

External Consultees

The application has been advertised under Article 15 of the Town and Country Planning General Development Management Order 2015. Site notices were displayed on site and 323 neighbours were consulted.

15 representations have been received, the contents of which are summarised below.

> Although there is much to be said for the redevelopment of the golf course I very much object to the inclusion of a rifle range. The prospect of the consequent noise in a quiet residential area is quite unacceptable.

> It is surreal to be asked for our comments on this, when at the same council meeting, it considered a proposal to build a secondary school on the remodelled 9th golf hole & 6 hole golf academy.

> Even in the now unlikely event that the 6 hole academy will be built, we would still like to know what mitigation measures would be taken to prevent some golf balls ending up in gardens that back onto the proposed academy.

> It is pointless to comment on the rest of the plans for the golf course as these will doubtless be changed.

> If this land has to be redeveloped I am in favour of the proposed 9 hole golf course and the planned activities that compliment it, but please, no school or housing.

> We like the concept of conservation wetlands for the endangered newt and restoring most of the golf course, even though it is reduced from the existing 18 hole design. Please add large berms near the tunnel entrance to deflect noise upwards from emerging and entering trains.

> This is green belt land and should stay that way. This is an area of trees and no way should they be felled

> As HS2 have only taken a relatively small portion, it would seem to be quite possible to redesign as 18 hole course in the remaining area, thus maintaining the green belt without further decimation and with no need for a 'golf academy' and any further building encroachment.

> This should be returned to its original 18-hole golf course and not 9 hole with attendant Golf Academy.

> HS2 have only taken a small part of the original course and there is plenty of scope to reconfigure the site to accommodate a revised 18 hole course.

> HS2 have already taken down a lot of trees from this 'GREEN BELT' site and to decimate more to make an Academy would be sacrilege.

> Generally, I am happy with this proposal. However, I have a request regarding one of the trees. This is tree No. T-F00233 and is a weeping willow that is just over the boundary of my property.

Ideally, I would like this tree removed as it is very large and especially in Summer blocks the light and view over the Golf Course.

> Please can you confirm if the 6 hole academy golf course will go ahead in light of the discussions about the land being used for a Secondary school.

> Ruislip golf course and the surrounding area that incorporates the Hillingdon Trail, are very important to the local community. We must maintain our green spaces and open air amenities, particularly with the advent of HS2.

> Could you include a designated dog area in your plans. May a large fenced area to allow dogs to run free or dog walks away from cyclists, walkers golfers and runners.

HISTORIC ENGLAND (GLAAS)

NPPF Section 16 and the London Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary.

I have looked at this proposal and at the Greater London Historic Environment Record but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

The planning application lies in an area of archaeological interest.

Although this application does not lie within an Archaeological Priority Area it nevertheless raises archaeological issues because it involves extensive groundworks on greenfield land where historic landscape features survive and there is potential for new discoveries. Whilst the planning application is 'freestanding' I note that in practice the proposed development is ancillary to the construction of High Speed 2 and the archaeological engagement with it should therefore be viewed in the wider context of the major programme of historic environment investigations being undertaken by HS2 in Hillingdon. I have been consulted on the proposals at pre-application stage.

The applicant's desk-based assessment helpfully sets out the known and potential heritage interests as they were understood in 2019. In summary there are several historic landscape features within the application site of sufficient local interest to merit preservation within the new golf course and also potential for as yet undiscovered buried archaeological remains. There are opportunities for conservation and interpretation of these assets, potentially including community archaeology activities.

Historic landscape:

Just over 200 years ago the land now covered by the golf course was enclosed from the medieval open fields of Ickenham and Ruislip. The open field system had been established across vast swathes of England by the time of the Norman Conquest and remained operational in many places up until the 18th or 19th centuries. It enabled village communities to share land which was cultivated in strips in large unhedged fields. The medieval peasants deliberately ploughed the land to create distinctive 'ridge and furrow' earthworks that gave physical expression to this system of land management. Open field systems reached their peak in the early-14th century before the Black Death reduced the population and demand for grain. The pattern of ridge and furrow at Ruislip golf

course is evident on aerial photographs and faint earthworks survive across parts of the golf course. These earthworks are not well preserved by national standards and formed only a fragment of the open fields of Ickenham and Ruislip. They have modest local historical value as a rare survival in London of medieval farming practices.

Another notable features are Clack Lane which appears to be a pre-enclosure lane which retains its character as an unmetalled hedged trackway. Clack Lane can be readily appreciated and enjoyed as a fragment of surviving Middlesex countryside and so would be worthy of retention within the new scheme, as is proposed.

The historic parish boundary (probably of medieval origin) crossed the site and, although not well marked on the ground would be worthy of recognition in the new scheme. The enclosure period hedgerows, canal feeder channel and site of Beeetonswood Farm are also historic features having been created between enclosure and the laying out of the golf course 100 years ago.

The Design & Access Statement recognises the ridge and furrow and hedgerows as of historic interest but doesn't mention Clack Lane or the parish boundary which should also be covered.

Archaeological interest:

The application site and its immediate environs were not at all well understood archaeologically prior to the current campaign of investigations by HS2. To a certain extent those investigations are reinforcing an earlier perception that the London clay geology was not favoured for settlement and that locally most premedieval activity occurred close to stream channels only expanding away from them in the medieval and post-medieval periods. In the Middle Ages the River Pinn appears to have formed the boundary between a landscape of village-centred open field arable and one of dispersed settlement associated with woodland and commons. Research is focusing on this landscape-scale dichotomy.

Unfortunately the desk-based assessment does not include the results of the latest trial trenching within and close to the application site which ought to be taken into account. If significant remains have been found then the detailed design may need to be amended and/or they could present an opportunity for community involvement in an archaeological investigation.

Impact of the development:

The extensive earthworks and drainage could cause serious harm or complete loss of buried archaeological remains as well as causing minor loss of ridge and furrow. Other aspects of the development could bring some (minor) benefits by recognising historic landscape within the new landscape design and providing heritage interpretation.

Because of this, I advise the applicant completes these studies to inform the application.

I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application.

NPPF paragraphs 193 - 194 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 197). Conservation can mean design changes to preserve remains where they are. NPPF paragraphs 185 and 192 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

In this case what is needed is submission of a report on the field evaluation trenching already carried out within and adjacent to the golf course and a review of its implications in relation to the site's archaeological potential and appropriate mitigation. Public engagement in archaeological investigations in this accessible location should be sought if significant remains are found.

Management Plan

Provision for conservation and interpretation of the site's heritage should be included in the construction and future management of the course.

I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application. NPPF paragraphs 193 - 194 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 197). Conservation can mean design changes to preserve remains where they are.

NPPF paragraphs 185 and 192 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.

If preservation is not achievable then if you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.

You can find more information on archaeology and planning in Greater London on our website.

This response only relates to archaeology. You should also consult Historic England's Development Advice team on statutory matters.

Additional Comments 24/4/2021

Recommend Archaeological Condition

Thank you for your re-consultation received on 26/04/21 following submission of the archaeological evaluation report.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

Results of the archaeological field evaluation

The report describes 22 evaluation trenches which were excavated across part of the mothballed golf course. Eighteen of the trenches contained archaeological features with dateable remains belonging to four different phases: Late Mesolithic, Late Bronze Age, Medieval and Modern. Other features were undated but believed to largely belong to the Prehistoric period.

Although there was only a single feature attributed to the Mesolithic period, a pit that contained 217 pieces of worked flint, features of this period are relatively rare particularly away from the Colne Valley itself which seems to have been a locally favoured location. Further evidence may be associated with this discovery that would contribute to research into hunter-gatherer communities in the north Thames tributaries and will complement other discoveries of this period made by HS2 near Dews Farm.

The Late Bronze Age features included postholes from a roundhouse as well as three cremation burials. Again this represents a significant discovery of settlement on the periphery of the main local focus of Bronze Age occupation across the Heathrow plateau and along the Colne. It could contribute to research into how prehistoric settlement and land use adapted to environments away from the gravel terraces. The undated features included boundary ditches, pits, postholes which might be broadly contemporary with this occupation.

The medieval features include areas of surviving ridge and furrow as well as a tile kiln and an associated metal surface indicative of woodland-based industry. Ruislip was an important manorial holding with extensive woodlands in the late Anglo-Saxon and Norman periods. This type of evidence together with similar remains found by HS2 near New Year's Green are providing a rare insight into the economic exploitation of these Middlesex woods.

In my previous letter of 2nd December I drew attention to the local historical interest of the medieval open field system and 'ridge and furrow' earthworks that gave physical expression to this system of land management and other locally significant historic landscape features that were worthy of retention.

The evaluation has demonstrated that the golf course contains significant archaeological remains of prehistoric and medieval date and has clear potential for further discoveries. The remains can be considered non-designated heritage assets of local to regional significance but nothing of national importance equivalent to a scheduled monument has been found.

Impact of the development

The extensive earthworks and drainage could cause serious harm or complete loss of buried archaeological remains as well as causing loss of ridge and furrow. Other aspects of the development could bring some benefits by recognising historic landscape within the new landscape design and providing heritage interpretation.

I have discussed the implications of the evaluation with the HS2 team and agree that these impacts could be mitigated partly by design to avoid harm in certain areas and partly by further archaeological investigation where harm cannot be avoided. There is also an opportunity to secure public benefit through engagement in the investigations (open days, school visits etc - subject to covid restrictions) and on-site interpretation (e.g, interpretation boards on-site and/or in the club house).

Recommendation

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

NPPF paragraphs 185 and 192 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities. Having regard to the significance of the assets and scale of harm I therefore recommend attaching a condition as follows:

No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. Details of a programme for delivering related positive public benefits

C. Details of measures to protect areas identified for preservation in-situ during construction

D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

Informative

The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

Archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Here excavation of trial trenches will be needed in areas where groundworks are proposed but have not already evaluated in this way. The field evaluation report will be used to inform a subsequent stage of mitigation if significant remains are found.

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving. Excavation will be necessary for those areas of significant remains already discovered plus any further discoveries from completion of the evaluation.

Preservation in-situ

Where archaeological remains are to be preserved in-situ within a development there will be a requirement to provide details of how this will be achieved. Typically this would involve a design and methods statement for groundworks.

Public benefit

Historic England's Greater London Archaeology Standards Paper 5 provides guidance on popular dissemination and communication. We recommend that the proposals identify audiences, messages and modes of engagement to demonstrate that the proposals will reach and benefit local communities.

NATURAL ENGLAND

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. Natural England's generic advice on other natural environment issues is set out at Annex A.

THAMES WATER

Waste Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk .

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water

Developer Services will be required. Should you require further information please refer to our website.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

ENVIRONMENT AGENCY

We are satisfied with the additional information sent in the letter from Skanska Costain STRABAG dated 22.03.21 and the proposal to undertake a water vole survey during spring 2021. We will want to see the results of this survey and consequently any changes to the methodology, if required. If there is evidence of water voles on site, works must stop immediately and advice must be sought from a suitably qualified ecologist to make amendments to the proposed works, including any mitigation and compensation measures.

We remove our previous objection and have no objection to the planning application subject to the planning conditions below being placed on any planning permission granted.

CONDITION 1

The water vole is fully protected under Schedule 5 of the Wildlife & Countryside Act 1981 and is a priority conservation species. It may be present at the proposed development site. No development shall take place until an updated survey is carried out to identify the presence of water vole. If water vole are found to be present, a plan detailing their protection shall be submitted to and agreed in writing with the Local Planning Authority. The plan must consider the whole duration of the development, from the construction phase through to development completion. Any change to operational responsibilities, including management, shall be submitted to and approved in writing by the local planning authority. The water vole protection plan shall be carried out in accordance with a timetable for implementation as approved.

Reason(s)

To protect the water vole and its habitat within the development site, and to avoid damaging the site's nature conservation value.

Note - The Environment Agency asks to be consulted on the results of the water vole survey and any subsequent protection plan.

The proposed development involves a cut and fill activity which presents a risk to surface and groundwater resources. Groundwater is particularly sensitive in this location because the part of the proposed development site:

- is within Source Protection Zone 1.
- is located upon Secondary aquifer A in hydraulic continuity with a surface water course.

The documents submitted in support of this planning application provides us with confidence that it will be possible to suitably manage the risks posed to groundwater resources by this development. Further detailed information will however be required before any development is undertaken. It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority.

In light of the above, the proposed development will be acceptable if planning conditions are included

requiring submission and subsequent agreement of further details as set out below. Without these conditions we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

CONDITION 2

Prior to each phase of development approved by this planning permission no development shall commence until a strategy to deal with the risks associated with contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
 - all previous uses and proposed uses including the cut and fill, importation of additional fill materials (e.g. elevated naturally occurring contaminants associated with London Clay and Lambeth group);
 - a conceptual model of the site indicating sources, pathways and receptors; and drainage and foundations designs
 - potentially unacceptable risks arising from contamination at the site.
 2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation and mitigation measures required and how they are to be undertaken.
 4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.
- Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reasons

- To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution in line with paragraph 170 of the National Planning Policy Framework and Position Statement F1 Non-landfill waste activities of the 'The Environment Agency's approach to groundwater protection'>.
- To prevent further deterioration of a water quality element to a lower status class and prevent the recovery of a drinking water protected area. The submitted Geoenvironmental report documents the previous uses of the 'site' and immediate surrounding however an assessment of risks to the water environment from the proposed importation of excavated arisings onto the receiver site is not included within this suite of application documents.

NB. See the Definition of Waste: Development Industry Code of Practice Version 2 March 2011

CONDITION 3

The development hereby permitted may not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority.

Reasons

- To ensure that the site does not pose any further risk to human health or the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with paragraph 170 of the National Planning Policy Framework.
- To prevent further deterioration of a water quality element to a lower status class and prevent the recovery of a drinking water protected area.

CONDITION 4

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 a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons

- To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 170 of the National Planning Policy Framework.
- To prevent further deterioration of a water quality element to a lower status class and prevent the recovery of a drinking water protected area.
- No investigation can completely characterise a site. The condition may be appropriate where some parts of the site are less well characterised than others, or in areas where contamination was not expected and therefore not included in the original remediation proposals.

CONDITION 5

The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul and surface water has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved. Reason:

- To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 170 of the National Planning Policy Framework.
- To prevent further deterioration of a water quality element to a lower status class and prevent the recovery of a drinking water protected area.

CONDITION 6

Piling and investigation boreholes using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reason To ensure that the proposed piling and foundations does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework and the Environment Agency's approach to groundwater protection, February 2018 Version 1.2
<https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Some piling techniques can cause preferential pathways for contaminants to migrate to groundwater and cause pollution. A piling risk assessment and appropriate mitigation measures should be submitted with consideration of the EA guidance. During piling works (especially if the piles extend to the Chalk within SPZ1 saturated zone) due to the proximity of nearby potable abstractions the weekly groundwater monitoring for insitu parameters and turbidity should be considered.
<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0202bisw-e-e.pdf> Decommission of investigative boreholes The submitted planning application indicates that boreholes will need to be installed at the development site to investigate groundwater resources / carry out soakage tests. If these boreholes are not decommissioned correctly they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 1.

CONDITION 7

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development / or of each phase of development.

Reason

· To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and The Environment Agency's Approach to Groundwater Protection February 2018 Version 1.2 <https://www.gov.uk/government/publications/groundwater-protection-position-statements>
· Link to archived EA guidance: https://webarchive.nationalarchives.gov.uk/20140328154120/http://cdn.environment-agency.gov.uk/LIT_6478_8cbe6f.pdf

Planning Informative

Please attached the following informative to any planning permission granted:

Informative: The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

ADVICE to Local Planning Authority & applicant

Flood Risk

We do have concerns regarding the blocking of the culvert which connects Ickenham stream, where it is an ordinary watercourse running through the golf course, to Ickenham stream main river south of the Chiltern mainline. We note from the Flood Risk Assessment (FRA) and also the drainage strategy, that the Hydrological-hydraulic operation of catchment shows that flows go north through this culvert to drain into the River Pinn. It is stated that this aspect is outside of this planning application;

"The effect of the blockage of the Ickenham Stream by the HS2 scheme will be assessed in the corresponding HS2 asset (West Ruislip Portal). At this moment, the drainage solution for this catchment to the south of the CML is work in progress."

We have concerns that this may increase the flood risk to the properties in this area and a resolution must be demonstrated prior to this flow path being blocked. However we will not be objecting in this instance as it is stated that this is being looked at within a different application but it is imperative this is not overlooked.

Abstraction of water - Water Resources Act 1991

Ruislip Golf Club previously used a Chalk borehole at NGR TQ 0844 8691 to meet the irrigation needs of the golf course. The Environment Agency had not issued a licence to abstract water to authorise this use of water. The re-design of the golf course provides an opportunity to confirm the irrigation needs and the source of water to be used. The legislation requires that where water is

abstracted from either a surface water or groundwater source that a licence to abstract water can be required. The developer is advised to contact the Environment Agency to discuss their water requirements which with careful planning could be incorporated into the re-designed layout of the course.

ADVICE to applicant

Model Procedures and good practice We recommend that developers should:

1. Follow the risk management framework provided in the updated guide is called Land contamination: risk management (LCRM), when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed. <https://www.claire.co.uk/projects-and-initiatives/nqms-sqp-register> The Planning Practice Guidance defines a "Competent Person (to prepare site investigation information): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation." (<http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/anne2-glossary/>)
4. Refer to the contaminated land pages on GOV.UK for more information.
5. We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by land contamination. e.g. British Standards when investigating potentially contaminated sites and groundwater, and references with these documents and their subsequent updates:
 - BS5930:2015 Code of practice for site investigations;
 - BS 10175:2011 A2:2017 Code of practice for investigation of potentially contaminated sites;
 - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;
 - BS ISO 5667-11:2009, BS 6068- 6.11: 2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns but more may be required to establish the conceptual site model and groundwater quality. See RTM 2006 and MNA guidance for further details).
 - BS ISO 18512:2007 Soil Quality. Guidance on long-term and short-term storage of soil samples
 - BS EN ISO 5667:3- 2018. Water quality. Sampling. Preservation and handling of water samples
 - Use MCERTS accredited methods for testing contaminated soils at the site.
 - Guidance on the design and installation of groundwater quality monitoring points Environment Agency 2006 Science Report SC020093 NB. The screen should be located such that at least part of the screen remains within the saturated zone during the period of monitoring, given the likely annual fluctuation in the water table. In layered aquifer systems, the response zone should be of an appropriate length to prevent connection between different aquifer layers within the system.

A Detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out. This increased provision of information by the applicant reflects the potentially greater risk to the water environment. The DQRA report should be prepared by a "Competent person" E.g. a suitably qualified hydrogeologist. <https://sobra.org.uk/accreditation/register-of-sobra-risk-assesors/> In the absence of any applicable on-site data, a range of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment.

· GP3 version 1.1 August 2013 provided further guidance on setting compliance points in DQRAs. This is now available as online guidance: <https://www.gov.uk/guidance/land-contamination-groundwater-compliance-points-quantitative-risk-assessments>

- Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50m.
- For the purposes of our Approach to Groundwater Protection, the following default position applies, unless there is site specific information to the contrary: we will use the more sensitive of the two designations E.g. if secondary drift overlies principal bedrock, we will adopt an overall designation of principal.

Where leaching tests are used it is strongly recommended that BS ISO 18772:2008 is followed as a logical process to aid the selection and justification of appropriate tests based on a conceptual understanding of soil and contaminant properties, likely and worst-case exposure conditions, leaching mechanisms, and study objectives. During risk assessment one should characterise the leaching behaviour of contaminated soils using an appropriate suite of tests. As a minimum these tests should be:

- upflow percolation column test, run to LS 2 - to derive kappa values;
- pH dependence test if pH shifts are realistically predicted with regard to soil properties and exposure scenario; and
- LS 2 batch test - to benchmark results of a simple compliance test against the final step of the column test.

Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance updated guide is called Land contamination: risk management (LCRM).

The verification plan should include proposals for a groundwater-monitoring programme to encompass regular monitoring for a period before, during and after ground works. E.g. monthly monitoring before, during and for at least the first quarter after completion of ground works, and then quarterly for the remaining 9-month period.) The verification report should be undertaken in accordance with in our guidance Verification of Remediation of Land Contamination <http://publications.environment-agency.gov.uk/pdf/SCHO0210BRXF-e-e.pdf>

1. Where SUDs are proposed; infiltration SUDs should not be located in unsuitable and unstable ground conditions such as land affected by contamination or solution features. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater. For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit. Further advice is available in the updated CIRIA SUDs manual http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx USTs

2. The Environment Agency recommends the removal of all underground storage tanks (USTs) that are unlikely to be reused. Once the tanks and associated pipelines have been removed, samples of soil and groundwater should be taken to check for subsurface contamination. If soil or groundwater contamination is found, additional investigations (possibly including a risk assessment) should be carried out to determine the need for remediation. Refer to 'Pollution Prevention Advice and Guidance on Storing and handling materials and products' <https://www.gov.uk/government/publications/underground-storage-tanks-ppg27-prevent-pollution> and 'Defra - The Groundwater Protection Code: Petrol stations and other fuel dispensing facilities involving underground storage tanks - for England and Wales' <http://archive.defra.gov.uk/environment/quality/water/waterquality/ground/documents/groundwater-petrol.pdf> specifically those sections relating to decommissioning redundant underground fuel storage tanks and infrastructure.

Additional comments received 16/11/2021

Thank you for consulting us on this application. We have reviewed the updated documents and have no further comments. Our previous response dated 22 April 2021 (NE/2020/132538/02-L01) is still relevant and attached for convenience.

Our comments with regards to the 'Ickenham stream tunnel' culvert that connects the Ickenham Stream ordinary water course to the Ickenham Stream main River still stands. The following is noted from the FRA (Flood Risk Assessment - Ruislip Golf Course S2), p22 section 5.1.6:

"The existing tunnel under the Chiltern Mainline will be closed because of the HS2 development. As shown in Section 5.3, there will be a negligible change in the local contributing catchments to the north of the Chiltern Mainline and consequently no significant alteration of the water flows within the application site. However, this closure could locally affect to the drainage of the small sub-catchment to the south of the Chiltern Mainline."

Our concerns remain that closure of this tunnel will increase the flood risk to the properties in this area. This must be accurately assessed and a resolution must be demonstrated prior to this flow path being blocked. From previous documents it was stated that this was being looked at within a different application but it is imperative this is not overlooked.

External Consultees (Additional)

NETWORK RAIL (Summary)

With reference to the protection of the railway, Network Rail has no objection in principle to the proposal, but below are requirements which must be met as the proposal includes works within 10m of the railway boundary. This is to ensure that the works on site, and as a permanent arrangement, do not impact upon the safe operation and integrity of the existing operational railway and for the avoidance of doubt of both the council and the developer who may not be aware of the potential for outside party proposals to impact upon the railway.

Network Rail recognises that conditions are imposed for a planning purpose and that they are fairly and reasonably related to the development and not be manifestly unreasonable. We believe that the comments included in this email are indeed fair and reasonable and relate to Network Rail's need to ameliorate the impacts that might otherwise flow from the development.

Measurements to railway tracks and railway boundary

When designing proposals, the developer and council are advised, that any measurements must be taken from the operational railway / Network Rail boundary and not from the railway tracks themselves. From the existing railway tracks to the Network Rail boundary, the land will include critical infrastructure (e.g. cables, signals, overhead lines, communication equipment etc) and boundary treatments (including support zones) which might be adversely impacted by outside party proposals unless the necessary asset protection measures are undertaken. No proposal should increase Network Rail's liability. To ensure the safe operation and integrity of the railway, Network Rail issues advice on planning applications and requests conditions to protect the railway and its boundary.

RAMS

The developer is to submit directly to Network Rail, a Risk Assessment and Method Statement (RAMS) for all works to be undertaken within 10m of the operational railway under Construction (Design and Management) Regulations, and this is in addition to any planning consent. Network Rail would need to be re-assured the works on site follow safe methods of working and have also taken into consideration any potential impact on Network Rail land and the existing operational railway infrastructure. Builder to ensure that no dust or debris is allowed to contaminate Network Rail land as the outside party would be liable for any clean-up costs. Review and agreement of the RAMS will be undertaken between Network Rail and the applicant/developer. The applicant /developer should submit the RAMs directly to: AssetProtectionLNWSouth@networkrail.co.uk

Network Rail would request that a condition is included in the planning consent as follows:

"A method statement and risk assessment must be submitted to the council and Network Rail for review and agreement prior to works commencing on site."

REASON: To ensure that the construction and subsequent maintenance of the proposal can be carried out without adversely affecting the safety, operational needs or integrity of the railway.

Lighting:

Lighting close to or adjacent to the railway boundary must not impact train drivers ability to perceive signals and therefore all column lighting is recommended to be:

White LED

Flat bottom luminaires

Downlit throw lighting

Lighting to be directed away from the railway boundary

If within three months Network Rail or a Train Operating Company has identified that lighting from the development is interfering with driver's vision, signal sighting, alteration/mitigation will be required to remove the conflict at the applicant's expense e.g. a sodium light on third party land can 'wash-out' a driver's ability to perceive a signal set at red: to the train driver the signal would be perceived as yellow and the driver would proceed even though a red signal indicates danger and to stop.

Encroachment

The developer/applicant must ensure that their proposal, both during construction, and after completion of works on site, does not affect the safety, operation or integrity of the operational railway, Network Rail land and its infrastructure or undermine or damage or adversely affect any railway land and structures.

There must be no physical encroachment of the proposal onto Network Rail land, no over-sailing into Network Rail air-space and no encroachment of foundations onto Network Rail land or under the Network Rail boundary.

All buildings and structures on site including all foundations / fencing foundations must be constructed wholly within the applicant's land ownership footprint. Buildings and structures must not over-sail Network Rail air-space.

Any future maintenance must be conducted solely within the applicant's land ownership. Rainwater goods must not discharge towards or over the railway boundary.

Should the applicant require access to Network Rail land to facilitate their proposal they would need to approach the Network Rail Asset Protection Team at least 20 weeks before any works are due to commence on site. The applicant would be liable for all costs incurred in facilitating the proposal and an asset protection agreement may be necessary to undertake works. Network Rail reserves the right to refuse any works by an outside party that may adversely impact its land and infrastructure. Any unauthorised access to Network Rail air-space or land will be deemed an act of trespass.

Drainage proposals and Network Rail land

The NPPF states:

"178. Planning policies and decisions should ensure that:

A site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability."

And

"163. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere."

In order to comply with the NPPF, the applicant must ensure that the proposal drainage does not increase Network Rail's liability, or cause flooding pollution or soil slippage, vegetation or boundary issues on railway land. Therefore, the proposed drainage on site will include the following:

All surface waters and foul waters must drain away from the direction of the railway boundary. Soakaways for the proposal must be placed at least 30m from the railway boundary. Any drainage proposals for less than 30m from the railway boundary must ensure that surface and foul waters are carried from site in closed sealed pipe systems.

Suitable drainage or other works must be provided and maintained by the developer to prevent surface water flows or run-off onto Network Rail's land and infrastructure.

Proper provision must be made to accept and continue drainage discharging from Network Rail's property.

Drainage works must not impact upon culverts, including culverts/brooks etc that drain under the railway. The applicant will not be permitted to direct surface or foul waters into culverts which run under the railway - any discharge of surface water under the railway via a culvert will require review and agreement from Network Rail who reserve the right to refuse use of any culverts.

The developer must ensure that there is no surface or sub-surface flow of water towards the operational railway.

Rainwater goods must not discharge in the direction of the railway or onto or over the railway boundary.

NB: Soakaways can materially affect the strength of soil leading to stability issues. A large mass of water wetting the environment can soften the ground, and a build-up of water can lead to issues with the stability of Network Rail retaining walls/structures and the railway boundary. Network Rail does not accept the installation of soakaways behind any retaining structures as this significantly increases the risk of failure and subsequent risk to the travelling public.

If the developer and the council insists upon a sustainable drainage and flooding system then the issue and responsibility of flooding, water saturation and stability issues should not be passed onto Network Rail. We recognise that councils are looking to proposals that are sustainable, however, we would remind the council that flooding, drainage, surface and foul water management risk as well as stability issues should not be passed 'elsewhere', i.e. on to Network Rail land.

The drainage proposals are to be agreed with Network Rail and surface water drainage on the site should be removed by a closed sealed pipe system.

The HSE identifies railways as a Major Hazard Industry. An earthwork failure within a high-hazard area has the potential to result in a catastrophic accident with multiple fatalities or long-lasting environmental issues. It should be noted that where the actions of an adjacent landowner have caused a landslip on the railway the loss adjusters are likely to advise recovery of Network Rail costs from the 3rd party, which would include costs of remediation and recovery of costs to train operators. Many railway earthworks were constructed in the Victorian period and are susceptible to failure by water saturation. Water saturation leads to an increase in pore water pressure within the earthwork material. Please also note that railways, and former railway land adjacent to it, is considered as contaminated land due to historic use of railways, which can affect the suitability of infiltration drainage.

Network Rail would request that a condition is included in the planning consent as follows:

Condition:

"Prior to the commencement of the development details of the disposal of both surface water and foul water drainage directed away from the railway shall be submitted to the Local Planning Authority and Network Rail."

Reason: To protect the adjacent railway from the risk of flooding, soil slippage and pollution.

The Council must ensure that suitable arrangements are in place for the maintenance and renewal of all new/amended drainage for the life time of the development, to mitigate risk of flooding to any adjoining land.

Excavation and Earthworks and Network Rail land:

The NPPF states:

"178. Planning policies and decisions should ensure that:

A site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability."

In order to comply with the NPPF, the applicant will agree all excavation and earthworks within 10m of the railway boundary with Network Rail. Network Rail will need to review and agree the works to determine if they impact upon the support zone of our land and infrastructure as well as determining relative levels in relation to the railway. Network Rail would need to agree the following:

Alterations to ground levels

De-watering works

Ground stabilisation works

Works to retaining walls

Construction and temporary works

Maintenance of retaining walls

Ground investigation works must not be undertaken unless agreed with Network Rail.

Confirmation of retaining wall works (either Network Rail and/or the applicant).

Alterations in loading within 15m of the railway boundary must be agreed with Network Rail.

For works next to a cutting or at the toe of an embankment the developer / applicant would be required to undertake a slope stability review.

Network Rail would need to review and agree the methods of construction works on site to ensure that there is no impact upon critical railway infrastructure. No excavation works are to commence without agreement from Network Rail. The council are advised that the impact of outside party excavation and earthworks can be different depending on the geography and soil in the area. The council and developer are also advised that support zones for railway infrastructure may extend beyond the railway boundary and into the proposal area. Therefore, consultation with Network Rail is requested. Any right of support must be maintained by the developer.

Network Rail requests a condition is included in the planning consent as follows:

Condition:

"Prior to the commencement of the development full details of ground levels, earthworks and excavations to be carried out near to the railway boundary shall be submitted to the Local Planning Authority and Network Rail."

Reason: To protect the adjacent railway and its boundary.

3m Gap

Network Rail requires that the developer includes a minimum 3 metres gap between the buildings and structures on site and the railway boundary. Less than 3m from the railway boundary to the edge of structures could result in construction and future maintenance works being undertaken on Network Rail land, and close to the railway boundary potentially impacting support zones or lineside cabling. All the works undertaken to facilitate the design and layout of the proposal should be undertaken wholly within the applicant's land ownership footprint including all foundation works. Network Rail requires a minimum 3m easement between structures on site and the railway boundary to ensure that we can maintain and renew our boundary treatments.

Trees

Proposals for the site should take into account the recommendations of, 'BS 5837:2012 Trees in Relation to Design, Demolition and Construction', which needs to be applied to prevent long term damage to the health of trees on Network Rail land so that they do not become a risk to members of the public in the future.

No trees shall be planted next to the boundary with the railway land and the operational railway, except for evergreen shrubs which shall be planted a minimum distance from the Network Rail boundary that is equal to their expected mature growth height. The vegetation planting must be in line with the attached matrix which has been agreed with the Tree Council. This is to prevent long term issues with leaf fall impacting the operational railway.

BAPA (Basic Asset Protection Agreement)

As the proposal includes works which could impact the existing operational railway and in order to facilitate the above, a BAPA (Basic Asset Protection Agreement) will need to be agreed between the developer and Network Rail. The developer will be liable for all costs incurred by Network Rail in facilitating this proposal, including any railway site safety costs, possession costs, asset protection costs / presence, site visits, review and agreement of proposal documents and any buried services searches. The BAPA will be in addition to any planning consent.

The applicant / developer should liaise directly with Asset Protection to set up the BAPA (form attached).

AssetProtectionLNWSouth@networkrail.co.uk

No works are to commence until agreed with Network Rail. Early engagement with Network Rail is strongly recommended.

Should the above proposal be approved by the council and should there be conditions, where the proposal interfaces with the railway (as outlined in this response) the outside party is advised that a BAPA (Basic Asset Protection Agreement) must be in place, in order for Network Rail to review and agree the documentation and works outlined in conditions (and those areas covered by the discharge of conditions).

The applicant is advised that before the proposal progresses (should it be approved) they will be required to submit the development form to Network Rail's Asset Protection team and agree the BAPA before any works commence on site.

Network Rail is a Government funded Organisation and we are expected to recover our involvement costs from this type of interface, to proceed in more detail with discussions a signed Basic Asset Protection Agreement (BAPA) would be required to be in place.

Permanent impacts of development are usually material considerations (such as the position of permanent structures, or drainage design etc) and where these are likely to occur, requests for

planning conditions or scheme amendments are requested to protect the existing railway infrastructure from the impacts of the works on site and as a permanent arrangement. Controls on the temporary impact of construction to outside party land should also be picked up via building control, or in some cases a party wall surveyor.

Once the attached Asset Protection Questionnaire has been completed and forwarded to the team the enquiry will then be processed and an email sent to the applicant giving a project reference number and name of person with the asset protection team that will deal with the enquiry.

For further information on interfacing with Network Rail please see Working by the railway - Network Rail.

Lineside vegetation management is a risk assessed process that contributes to the safe running of the railway infrastructure.

The reference document supports the business process for vegetation management and lists

- The types of vegetation species recommended for planting within the Network Rail infrastructure;
- The types of vegetation species not recommended for planting within, or adjacent to, the Network Rail infrastructure.

The recommended planting species matrix is a control for the following threats:

- Hazardous trees or trees within falling distance of the track or a rail non-rail target;
- Vegetation affecting OLE, signal sighting, level crossing sighting, position of safety/refuge, obstructing railway infrastructure;
- Leaf fall affecting railway;
- Injurious invasive plants.

The reference document supports the following control on the threats for Railway or Third party vegetation affecting safety:

- Undertake vegetation inspections/surveys; Identify risks and implement mitigation.

Internal Consultees

POLICY AND ENVIRONMENTAL PLANNING

Proposed development

Reconfiguration of a golf course, construction of 1 storey rifle range and reconstruction of a driving range.

Designations

Green Belt

Grade II SINC (part)

Principle of Development

The proposed development site is designated as Green Belt. In accordance with the NPPF, London Plan policy G2, Local Plan policy DME1 4 'Development on the Green Belt or Metropolitan Open Land', inappropriate development should not be approved except in very special circumstances. Inappropriate development in the Green Belt is, by definition, harmful. In accordance with paragraph 145, the construction of new buildings in the Green Belt is harmful except, among other things, the provision of appropriate facilities for outdoor sport and recreation if the facilities preserve the openness. As the most recent established use of the site was as a golf course, the proposed reconfiguration and provision of associated facilities relate directly to the continued use of the site for outdoor sport and would therefore be an exception as defined by para 145 of the NPPF. This includes the provision of the replacement driving range which has an almost identical footprint to the

existing facility and would therefore also fall under the provisions of paragraph 145(g) for limited infilling, or partial or complete redevelopment of previously developed land provided it does not have a greater impact on the openness of the Green Belt than existing development.

A separate assessment will need to be made as to the impact on the openness.

The proposed rifle range is also a replacement facility. However, the previous rifle range was located outside of the application boundary, on a site that has since been cleared as part of the construction works for HS2. As the rifle range does not provide for outdoor sport or recreation it does not fall under exception para 145(b) of the NPPF. However, it is important to consider if para 145(g) would be applicable given that this is a replacement facility. The application information is not clear on the current use of the land to which the new rifle range will be located, and this should be clarified as to whether this should be treated as previously developed land. If this is not previously developed land, the proposal will need to demonstrate 'very special circumstances' to show that the potential harm by reason of inappropriateness, and any other harm, is clearly outweighed by other planning considerations. Given that the HS2 works have resulted in the previous facility being removed and prevented replacement in situ, the need to make replacement provision should be given significant weight. It is also clear from the planning statement that the new building will be of a very similar scale to that which has been lost, indicating that any additional impact on openness will be minimal. Finally, the change in context as a result of the HS2 works, is also likely to impact on the context of the proposals and this should be considered.

It is noted that part of the site is located with a Grade 2 SINC. Policy G6 of the London Plan states that SINC's should be protected. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity a mitigation hierarchy set out in the Plan should be followed. This could include a requirement to provide offsite mitigation. Policy DME17 of the Local Plan Part 2 sets out a similar approach for developments on or near sites of ecological value. Applicants must show that developments will not have unacceptable impacts and sets out a set of principles to be followed if harm to biodiversity cannot be avoided

FLOOD OFFICER

Observations

An FRA 1MC04-SCJ-DR-ASM-SS05_SL07-000001 Rev C05 and Drainage report 1MC04-SCJ-DR-REP-SS05_SL07-000003 has been submitted for the site by HS2 Both dated June 2020 Rev C05. There is no Water Framework Directive Assessment submitted with this proposals.

Summary of Key Issues

There are multiple existing watercourses on the site which drain a wider network of Thames Water Sewers from the surrounding residential area. The Ickenham Stream crosses the site and the Main River Pinn forms the western boundary.

The Drainage

These outfalls are not clearly identified within this report, nor are the actual areas that drain to these points made clear which are different to the area identified in Figure 1.

The catchment to the south of the CML is acknowledged but not included in calculations, and the line to the East is a straight line indicating that no assessment in reality has been made of the Thames Water Network in this area which it is stated has been used to inform this catchment area. However, the contributing catchment of SC4 is acknowledged

However, it is not therefor clear that the appropriate catchment areas have been used to estimate run off though the golf course. Section 5.1.1 The proposed drainage network is designed for a 1 in 5 years return period rainfall. However, the main drainage network which receives water from external urban catchments are designed for a 1 in 30 years return period. It is also not clear why conveyance

of only 1 in 5 and 30 year events have been used no has evidence been provided to justify this, or demonstrate that this is adequate to receive both all flows from Thames Water sewers and above ground flows across the site.

A large area drains to the River Pinn via this site and the site provides significant opportunity to slow the flow to the River Pinn, an area which the Environment Agency are actively leading on a Flood Alleviation scheme to minimise the risks from, not just maintain the status quo.

Footpaths are in general drained by gullies connected to the main drain conduits which runs along them. When a drain pipeline is not projected along the footpath, the footpath is drained by a ditch.

It is not clear which areas within the reports are to be raised affecting drainage, and this should be included in the flood and drainage reports or clearly cross referenced for review.

As the site is designed only to a 1 in 30-year event it is not clear where exceedance flows would occur across the wider area and site and these flow paths need to be assessed. The proposals to drain the car park involve a formal drainage system and gullies and pipework. However, it is not clear why the least sustainable solution has been provided or how other more sustainable alternatives have been considered in accordance with Hillingdon Local Plan Policies listed below. Rain gardens and open swales for sheet flow run off should be considered in preference to gullies and pipe which require additional cost to the Council to inspect and maintain.

It is noted that 3 ponds for water reuse are proposed along with the provision of pumping. The outlets proposed are large and not detail of these or safety features required on these detailed.

Section 5.3.11 Table 22 details the proposed ditches which appears to suggest a 0.5 % side slope which the preference is for 1 in 3 side for any ditch were possible. No cross section of existing and proposed are indicated or how this impacts on the landscaping alongside existing features. Section 6.1.2 indicates the new realigned Ickenham Stream will discharge to the River Pinn and it is also used as an attenuation basin and as an ecological corridor. For a higher return period events, the Ickenham Stream performs as an attenuation basin. It is not clear how this will attenuate flows in higher events if it is not designed for larger events and no level details have been provided.

The FRA mentions:

Similarly, LB Hillingdon has developed sustainable drainage requirements as set out in the Sustainable Drainage Design and Evaluation Guide.

11.1.9 The proposed drainage system has been designed in accordance with relevant planning policy. In summary:

- irrigation needs of the application site are entirely met by drained water which is collected and stored on site. A water harvesting system is designed as part of the drainage network. The drainage network is connected to three ponds and three tanks which provide the required water storage volume; and
- designed drainage network will reduce the current runoff flow rates to the River Pinn.

The 1 in 100 rainfall event plus 40% of climate change allowance is attenuated to the Greenfield rates. The attenuation is achieved providing additional volume in the water harvesting ponds and tanks. However, the Drainage Strategy does not mention this or adhere to its requirements.

Fluvial Flood Risk

It is not clear which modelling report the extents of flood risk have been based on. The Council are aware the HS2 has updated the Environment Agency mapping, but the extracts from the FRA are shown to be what is publicly available, so it is not clear that this proposal has used the best available data. There are concerns with the original EA modelling that this does not represent accurately the

most recent large event in 2016 or in flows from ordinary watercourses or Sewers, which is critical in this area. The watercourses within the Golf Course do not freely discharge to the River Pinn when it is high, backing up within the golf course and causing disruption to residents and the Celandine Walk. There are no proposals which appear to address this issue as promised.

Groundwater Flood Risk

The FRA simply refers to indicative modelling that this risk is low and do not acknowledge the information provided by LBH that there are springs within the site and how this applicants and import of spoil will affect these.

Blue Ribbon Network

No information on the indicative cross section and design of the watercourses proposed though the site has been provided. The Clacks lane watercourses, which are the main continually fed streams on the site appears to be proposed to be captured by the basins within the site, which will disrupt the continuity of ecological corridor and any migration. These streams must remain free from obstruction. As this proposal is not considered to meet Water Framework Directive objectives to provide a better water environment within the catchment. A consideration of the existing and proposed lengths of watercourse gained and lost need to be provided and the quality of these watercourses must be considered.

Section 6.1 3 Drainage Report In addition, it is proposed to redefine the Clacks Lane's channels downstream of the Ickenham Stream, crossing and replacing the existing culverts at Hill Lane and Celandine Route to improve channels capacity up to 1 in 30 years return period (420 l/s). These historic bridges provide historic value and it is not clear what these will be replaced with.

No enhancement or acknowledgement of the wider changes being undertaken nearby which may affect the golf course and the access to and across the golf course and feedback provided to enhance the public access along the Celandine Walk.

Relevant Policies

- Hillingdon Local Plan: Part 1- Strategic Policies Policy EM6 Flood Risk Management in (Nov 2012)
- Hillingdon Local Plan Part 2 Development Management Policies Policy DMEI 1 Living Walls and Roofs and on site vegetation (Jan 2020)
- Hillingdon Local Plan Part 2 Development Management Policies Policy DMEI 9 Management of Flood Risk (Jan 2020)
- Hillingdon Local Plan Part 2 Development Management Policies Policy DMEI 10 Water Management, Efficiency and Quality (Jan 2020)
- London Plan Policy 5.12 Flood Risk Management (March 2016)
- London Plan Policy 5.13 Sustainable Drainage (March 2016), and
- London Plan Policy 5.15 Water use (March 2016).
- National Planning Policy Framework (June 2019), and the
- Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

Additional Comments (22/11/2021)

There have been significant improvements in the proposals, removing the ordinary watercourse from flowing into the rainwater harvesting tanks. However there is a small section of land within the redline boundary for which works are proposed which are not within ownership of HS2 or the properties of Hill Rise and we would like reassurance of purchase. There are a number of aspects of the drainage proposal which do not meet best practice and will result in significant maintenance as well as opportunities to make best use of golf course to collect and store water as well as slow the flow. A condition is therefore requested to ensure the submission of an updated drainage strategy to incorporate these.

HIGHWAY ENGINEER

Site Characteristics and Background

The application site sits within a predominantly residential catchment and in proximity of West Ruislip LU train station on Ickenham Road which is a major thoroughfare and is therefore designated as 'classified' in the council's hierarchy of roads.

The existing council owned '18-hole' public golf course and a '40 bay' driving range together with a rifle club facility were closed in August 2019 in order to facilitate HS2 'portal' related works in the southern segment of the site which have permanently reduced the scale of the original site. This has prompted this current application which proposes a reworked business model which incorporates a reconfigured '9-hole' golf course, a '20 bay' driving range, a new '6-hole' academy course, a practice/putting green together with a 'like for like' replacement rifle club facility.

The existing private access arrangement via Clacks Lane which leads directly off Ickenham Road would remain unaltered to serve the revised activities as would the quantum of 160 on-plot parking spaces.

The locality is comprehensively covered by parking controls including a controlled parking zone (CPZ) operating 7 days per week between 9am and 5pm and the public transport accessibility level (PTAL) is at a moderate level of 3 however in practice, the 'real world' PTAL is somewhat higher than numerically depicted due the proximity of West Ruislip LU Station and a plethora of local bus serving the locality.

Appraisal

The original golf course accommodated 400 members with a 'Pay and Play' outlet available to the general public. Previous records indicate that in years 2017/18 approximately 18,000 rounds of golf were played together with a measurable level of 'Pay & Play' activities with, in excess of 10,000 tickets sold.

The proposal would consolidate operations with additional elements of golf/rifle club-related provisions which are summarised as follows:-

- '9-hole' golf course
- '20 bay' driving range,
- New '6-hole' academy course,
- New practice/putting green
- 'Like for like' replacement rifle club facility.

Opening Times

There is no change proposed to Weekday & Saturday periods of operation. Seasonal variations will remain which shorten opening periods. The maximum opening times are as follows:-

Golf Course - 8am to 10pm

Driving Range - 9am to 9pm

Rifle Club - 7pm to 10pm (Saturday - 9.30am to 3.30pm)

Vehicular Traffic Generation (Before and After Comparisons)

The main changes to the business model consist of the scaled down '9-hole' golf course and consolidated '20-bay' driving range (reduced from 40) and the '6-hole' academy course. The practice/putting green would be an ancillary to the revised golfing provisions and would not be a measurable contributor to trip generation related to the site and is therefore reasonably excluded from base-line calculations.

The 'like for like' replacement rifle range was originally a low-key operation with a maximum of 15 patrons attending at any one time during a relatively small off-peak 'window' on weekday evenings and a longer daytime opening on Saturday. Hence the proposal would remain consistent with previous activities. Nevertheless, the anticipated low level of activity has not been taken into account within the applicant's assessment which will be addressed later in this appraisal. The use profile aspect of the servicing and waste management regime will stay unaltered.

Daily site use (pre-closure)

It has been estimated that in capacity terms, approximately 342 customers used the '18-hole' course and '40-bay' driving range on a daily basis. The industry recognised trip generation land use database (TRICS) has been interrogated and for this scale of golf course, the level of vehicular activity would normally be expected to be in the region of 242 one-way (or 488 two-way) daily vehicular trips owing mainly to the reduction of movements due to the aspect of car-sharing.

When further applying the trip generation database with specific reference to two-way movements during the peak morning and afternoon weekday periods - 8am to 9am & 5pm to 6pm, this would translate to 23 trips (am) & 46 trips (pm). 64 two-way trips would be expected during the Saturday peak activity period of 10am - 11am.

Daily site use (proposed)

In statistical and commercial terms, it would normally be expected that any potential increase in vehicular activity resulting from the proposal would be principally centred on the golf course's reduction from 18 to 9 holes as this is traditionally a larger attractor of patronage due to the less onerous and more economically attractive family oriented nature of a smaller course.

This is confirmed by the findings sourced from the land use data-base which predicts a realistic doubling of traffic activity from 242 one-way (or 488 two-way) daily vehicular trips to a level of 473/946 respectively. This would translate to 44 trips (am) & 88 trips (pm). 123 two-way trips would be expected during the Saturday peak activity period of 10am - 11am.

Highway Impact

The applicant has provided traffic survey data undertaken in July 2018 which is considered to be representative of base-line daily traffic flows on Ickenham Road including peak traffic periods. This enables the 'worst case' percentage traffic uplift of the proposal to be deciphered.

The National Planning Policy framework (NPPF) - Paragraph 109 makes reference to refusal of development proposals on highway grounds only where impacts are severe. However, there are no official national or regional standards or threshold guidance related to defining the term 'severe' or the acceptable level of development percentage impact that can be absorbed within the existing highway network with or without highway interventions.

However in the past, the Chartered Institution of Highways and Transportation (CIHT) (formally IHT) traffic assessment guidelines (circa 1994) trip generation thresholds were traditionally recognised as appropriate guidance which would allow for an informed decision to be made on whether development impacts could be absorbed within existing highway networks with or without highway interventions i.e. mitigations. Threshold triggers of 5 and 10% development traffic uplift were established for congested and other roads respectively to establish whether mitigation measures (if achievable) could enable a proposal to be acceptable on highway grounds if these percentages were exceeded.

Although this once ubiquitous method of approach is no longer applied, it is still considered as a worthwhile measure and guide for gauging the suitability or non-suitability of a proposal on highway traffic generation grounds.

In line with this approach, the highest predicted imposition on weekday base-line traffic flows

fluctuates from between 1.1 to 2.1 % with the highest impact of 3% on a Saturday. These figures fall below the 5% threshold of development acceptability hence impacts can be considered as not 'severe'.

Nevertheless, the overall levels of % uplift would directly impart additional activity within Clacks Lane and its junction with Ickenham Road which may lead to vehicular conflict as a result. These roadways are considered highly sensitive and as the accident record for this specific location is considered as good, the Highway authority have a duty to maintain this status quo.

It is therefore recommended that a 3-stage road safety audit (RSA-stages 2,3 and 4) is undertaken at this location in order to take stock of the existing arrangement with identification of any layout and/or safety enhancements that can be introduced prior to or post-construction. This exercise would also be pertinent to construction vehicle activity in this vicinity. The RSA would be secured via planning condition.

Parking Provisions

The original site contained 160 parking spaces which were surveyed when the '18-hole' course was open, and observations indicated that the car park had an approximate 60% peak occupancy during both the weekday and weekend periods. To discover how the proposal would impact car park occupancy, a further parking accumulation parking assessment has been undertaken using survey data collated in 2018. In comparison with the previous 60% peak occupancy, it is estimated that the proposal could result in up to 92% peak occupancy within the 160 - space car park. This % is considered on the high side as normally a maximum 85 percentile figure should be sought in order to cater for and safeguard for any fluctuation in unexpected demand. However, as the figure is based on a worst-case scenario and a level of spare capacity would still be in evidence, the predicted peak occupancy is, on balance, considered containable within the quantum of acceptable.

Disabled Compliant Parking Provision

In accord with the parking standard - 10% of parking spaces should be disabled compliant equating to 16 spaces which should be secured via planning condition.

Electric Vehicle Charging Point (EVCP) Provision

Within the proposed parking quantum there is a requirement for EVCPs to be provided which would equate to a minimum of 5% of the parking spaces provided in total being dedicated both to 'active' and 'passive' provisions. This amounts to 8 spaces for each provision which again can be secured via planning condition.

Construction - Trip Generation and Routing

Two-way construction routing relating to the new course would occur via A40/Swakeleys Roundabout, Swakeleys Road, High Road/Ickenham Road with vehicles entering the site via the newly established 'portal' access on Ickenham Road and would then exit the site via Clacks Lane. The construction process is likely to span 18 months (April 2021 until March 2023) with a projected reopening of the course in November 2024. The presented detail on vehicle numbers relates to the sole impacts of the application and does not appraise the cumulative impacts of the scheme with concurrent HS2 portal construction works which are on-going. The applicant states that a cumulative assessment will be undertaken and be inclusive to a revised HS2 Local Traffic Management Plan (LTMP) however this is not presented within the latest version issued in August 2020. There is, however, reference to the West Ruislip portal works within the current LTMP with a stated 120-130 average daily two-way HGV movements but without an estimated use frequency profiles.

Irrespective of the above, it is the intention for the excavated spoil from the portal works to be used to

remodel the existing course. This would reduce the level of overall HGV activity to and from the site which, clearly is supported. Indicative attending construction vehicle figures are provided totalling 1160 vehicles (some 400 HGV and 750 other construction related vehicles) spanning a 36-month construction period. These figures have then been simply averaged over this period indicating that 32 vehicles per month (or 1 a day) would attend the site. If this is to be the case, then such imposition on the highway network would be considered minimal. However as this figure has been generated from a broad-brush assumption that activities would be spread equally throughout the 36 month construction period, this aspect needs further verification with submitted detail by way of a detailed histogram with estimated monthly, weekly and daily/hourly activity profiles with particular attention to the peak morning and afternoon traffic base-line periods which are the most critical in terms of exposure to untoward highway impact. Avoidance of peak periods should therefore be a key priority.

The above information would allow for a fully informed decision to be made on the acceptability (or otherwise) of the level of likely activity. However, in its absence and in terms of determining this particular application, it is considered that a planning condition related to restricting peak hour traffic construction movements is applied as a safeguard against detrimental highway impact. It reads as follows:-

"Prior to the use of the roads which are the subject of this application, the applicant shall submit a traffic management plan specific to the proposed works which should be agreed in writing with the LPA. This plan should indicate the measures to reduce the impacts on peak hour traffic (0730-0930 and 1630-1830) and include workforce numbers with activity profiles, details of access and egress management at the site, and general traffic management arrangements. The operation of the roads must proceed in accordance with the traffic management plan together with a comprehensive Highway network monitoring regime applied throughout the period of works".

Conclusion

Subject to the above 4 planning conditions, the following would apply:-

"The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies 6.3 and 6.13 of the London Plan (2016)."

CONTAMINATION OFFICER

There is not much I can comment on here because of the HS2 involvement at the site.

However, I do wish to ensure that the land continues to be suitable for use in the future and therefore I am recommending the following condition be applied:

(1). No contaminated soils or other materials shall be imported to the site; All imported soils for engineering/ landscaping purposes shall be clean and free of contamination. Before any part of the site is occupied all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted in the form of a suitable validation and verification report for approval in writing by the Local Planning Authority.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

TREE AND LANDSCAPE OFFICER

The application site is occupied by Ruislip Public Golf Course (LBH freehold), a driving range and associated facilities located to the west of Ickenham High Road. Situated to the north of West Ruislip Station, the southern boundary is defined by the Chiltern Railway Line on an embankment and the route of the proposed HS2 railway. Residential properties are located to the north off Hill Lane. To the west of the site there is open space bounding Breakspear Road North.

Clacks Lane is an ancient track (ref. R145) which bisects the site on an east-west axis, linking the High Road (to the east), through towards Tile Kiln Lane, off Breakspear Road North. A footpath (ref. R146 / U81) links the residential area of The Greenway, to the south of the railway, with Clacks Lane.

The River Pinn meanders through the open space to the west and there are drains and other watercourses traversing the site.

The existing site plan, by HS2, and aerial photographs depict the golf fairways and greens, separated by tree-lined roughs.

There are no TPO's or Conservation Area designations affecting the site. The golf course lies within designated Green Belt.

COMMENT: Existing trees

A tree report in accordance with BS5837:2012, has been prepared by The Ecology Consultancy, following a survey undertaken in October 2018.

At 3.1 the report confirms that the survey recorded 213 individual trees and 121 groups situated inside the site, or adjacent to it. Table 1 analyses the prevalence of different species and groups.

31 individuals and 20 groups were graded A, 78 individual and 53 groups B, with 100 individuals and 48 groups of lower value C and 4 U category.

A tree retention and removal plan is provided in Appendix 4.

A tree removal plan and Table 2 identify the 50 individual trees and 20 groups due to be removed, or partially removed to facilitate the development; 11 x A grade trees, 37 x B grade, 27 x C grade and 1 x U grade.

The percentage of canopy area to be removed is calculated in Table 3.

An arboricultural impact assessment, based upon the Construction Works Plan is described at 3.3 and in Table 4.

The general arrangement plan indicates additional tree loss required to accommodate the remodelling and landscaping of the proposed golf 3.3.8.

An arboricultural method statement is specified in section 4 supported by a Tree Protection Plan in Appendix 5. An arboricultural consultant will be appointed to monitor and advise on tree protection measures throughout the contract and there will be an auditable schedule of inspection (4.1.2).

At 4.1.28 the report confirms that a site meeting will be set up with the landscape contractor, arboricultural consultant and LPA tree officer (landscape architect?) prior to the commencement of any new planting. Contact details for the method statement are given in 4.1.36.

At the end of the report the appendices provide; A1. Phase 1 Schedule of Trees, A.2 Phase 2 Schedule of Trees, A.3 Tree Constraints Plan, A.4 Tree Retention & Removal Plan, A.5 Tree Protection Plan, A.6 Tree Protection Fencing & Ground Protection, A.7 Signage.

COMMENT: Landscape / ecology

An outline Materials Management Report has been submitted.

A species report considers the biodiversity of the area and provides details of the flora and fauna surveys. This includes the survey methods, results and summary of protected species and botanical /habitat maps.

The drainage proposals have been subject to consultation with Hillingdon's drainage specialists.

COMMENT: Golf course design

The D&AS sets out the design objectives supported by plans, sections and illustrations of the proposed 9-hole golf course, with a driving range, 6-hole academy course and practice facility.

Green infrastructure restoration and enhancements will incorporate new topography, woodland creation with understorey planting and groundcover, woodland edge, hedgerows, rough grassland. The proposals will introduce new waterways, stream corridors, ponds and pond margins. The layout will include habitat for great crested newts and other linked wetland habitats.

The design and layout of the new golf course comprises undulating topography with the course and associated landscape designed in consultation with the Green Spaces and golf course managers.

A Landscape Management & Maintenance Plan for the golf course sets out the landscape objectives and the programme of management and maintenance operations for the different vegetation typologies across the site.

RECOMMENDATION

No objection subject to conditions RES9 (parts 1,2,4,5 and 6) and RES10. A bespoke condition should require details of sub-soil and top-soil storage, handling and formation.

Further to the submitted information the opportunity should be taken to secure a Biodiversity Net Gain calculation which should be based on DEFRA's recommended UKHab survey methodology.

As noted in 4.1.28 of the tree report, the Council's landscape architect and tree manager should be consulted prior to the commencement of work on site, or should any landscape, or tree-related matters arise during the life of the project (email: trees@hillingdon.gov.uk)

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The site is designated Green Belt land. Paragraph 137 of the NPPF says that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.

Policy G2 of the London Plan 2021 says that the strongest protection should be given to London's Green Belt,

Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) of the Local Plan: Part 1- Strategic Policies (2012) says that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.

Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open Land) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) says that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

In accordance with the NPPF, London Plan policy G2, Local Plan policy DMEI 4 'Development on the Green Belt or Metropolitan Open Land', inappropriate development should not be approved except in very special circumstances. Inappropriate development in the Green Belt is, by definition, harmful. In accordance with paragraph 145, the construction of new buildings in the Green Belt is harmful except, among other things, the provision of appropriate facilities for outdoor sport and recreation if the facilities preserve the openness.

As the most recent established use of the site was as a golf course, the proposed reconfiguration and provision of associated facilities relate directly to the continued use of the site for outdoor sport and would therefore be an exception as defined by para 149 of the NPPF.

The driving range building with its individual bays is a piece of infrastructure dependant on the provision of an expansive driving range field. This will allow golfers to make the best use of the facility. The provision of the driving range is therefore considered compliant with NPPF on the basis that it is a facility to be used in connection with and to complement the site's wider and continuing outdoor sporting function.

It should also be noted that Paragraph 150 of the NPPF states that certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes engineering operations. Accordingly, this element of the scheme and its associated uses therefore represent appropriate Green Belt development.

In light of the above, and given the classification of the proposed earthworks as an engineering operation, the proposed reconfiguration of the golf course and associated facilities are not considered to be inappropriate development in the Green Belt and it therefore does not conflict with paragraph 137 of the NPPF, policy DMEI 4 and DMEI 6 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020), Policy EM2 of the Local Plan Part 1 (2012) and Policy G2 of the London Plan (2021).

Rifle Range

Of all the uses proposed as part of this application, the one that risks being considered "inappropriate" is the erection of the new rifle range building. The applicant has argued that the provision of the replacement driving range which has an almost identical footprint to the existing facility, would fall under the provisions of paragraph 149 for limited infilling, or partial or complete redevelopment of previously developed land, provided it does not have a greater impact on the openness of the Green Belt than existing development.

It is acknowledged that the rifle range does not relate to an outdoor sport use and therefore

it is considered that it does not otherwise meet the NPPF exceptions for appropriate Green Belt uses. The application information is not clear on the current use of the land to which the new rifle range will be located and it is not clear whether this should be treated as previously developed land. If this is not previously developed land, the proposal will need to demonstrate 'very special circumstances' to show that the potential harm by reason of inappropriateness, and any other harm, is clearly outweighed by other planning considerations. Accordingly, with a view to minimising adverse Green Belt impacts associated with this element of the proposal, the applicant has set out the following very special circumstances:

- The scale and quantum of the "inappropriate development" is the optimal necessary, thus ensuring any potential harm caused by the proposal is minimal.

- That there are no suitable or viable alternative sites for this element of the development that would be more preferable in planning terms. Recognising the Council's preference for a replacement facility to be located outside the borough's Green Belt, the Ruislip Rifle Club commissioned an exhaustive search of potential alternative non-Green Belt sites within the borough to determine if any were suitable or viable to accommodate the new rifle range. Based on the particular requirements associated with a rifle range, no suitable alternative non-Green Belt sites were identified in the borough within a 7km radius of the application site. This was deemed the maximum reasonable distance which the club could relocate without resulting in significant loss of members. Sites were discounted on a range of grounds, including safety risks to other tenants, potential amenity effects on neighbouring uses, as well as particular challenges around the configuration of floorspace or characteristics of the premises.

As the club cannot be accommodated on non-Green Belt land within LB Hillingdon, it is considered that the application site remains the most suitable location for the proposed rifle range. The proposed layout of the application site means that the replaced rifle range can continue to benefit from the existing car parking and vehicular access, which will not be altered as part of the proposed development. This avoids any need for additional land-acquisition or to obtain planning permission for additional built-development in the Green Belt, which would neither be feasible nor economically viable for Ruislip Rifle Club given the limited financial resources available to it.

The existing rifle range facility was lost as a result of its location within the safeguarded HS2 development zone. The new rifle range proposed as part of this application therefore provides an equivalent facility and is a requirement of the Hillingdon Agreement.

The new facility is proposed within a closer proximity to the existing Fairways Public House. This compacts the extent of built massing across the site with a view to minimising impacts on openness and therefore represents an improvement from the rifle range's original position.

It represents the replacement of a building already on Green Belt land; whereby the uses and operational requirements proposed would not change; and the overall proposed size would comprise a smaller footprint than the existing facility.

Given that the HS2 works have resulted in the previous facility being removed and prevented replacement in situ, the need to make replacement provision should be given significant weight. It is also clear from the planning statement that the new building will be of a very similar scale to that which has been lost, indicating that any additional impact on

openness will be minimal. Finally, the change in context as a result of the HS2 works, is also likely to impact on the context of the proposals and this is acknowledged.

It is considered that robust 'very special circumstances' have been established to allow the replacement rifle range in this IGreen Belt location.

Protection of Public Open Space

Hillingdon Core Policies EM4 and CI2 look to protect and improve leisure and recreational facilities within the borough, including green infrastructure. Similarly, London Plan Policy G4 aims to protect green space and ensure it remains publicly accessible. The proposal is not considered to conflict with the above mentioned policies.

In light of the above, the principle of the development is supported, in compliance with local and London Plan policies and national guidance.

7.02 Density of the proposed development

Not applicable to this application.

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

Core Policy HE1 Heritage aims to conserve and enhance Hillingdon's distinct and varied environment, its setting and the wider historic landscape. Policy DMHB1 states that the Council will expect development proposals to avoid harm to the historic environment.

London Plan Policy HC1 sets out that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

The heritage impacts are addressed in a Heritage Statement submitted in support of the application.

There are three Grade II listed buildings approximately 150m to the north of the application site, and two locally listed buildings around 50m to the north. As set out in section 2 of the Design and Access Statement, these assets are visually screened from the application site by dense understorey and mature tree planting along the northern and southern banks of the River Pinn, which will not be affected as part of the proposed development. Whilst some earthworks are included in the design directly to the south of these assets, these are minor in scale and it is not considered that the proposal will adversely affect the settings of the assets.

The application site is directly adjacent to a locally listed building, (120 Sharps Lane), as well as the Ruislip Village Conservation Area (CA), to the east. The Ruislip Village CA Appraisal (2010) does not specifically highlight the application site as a major contributor to the setting of the CA, though its "green and open setting" is noted more generally. It is considered that the proposed development will not adversely affect these characteristics.

The design has responded to the requirements set out in Policy DMHB 4 of the Hillingdon Local Plan: Part 2, which require development on the fringes of CAs to preserve or enhance the character or appearance of the area. The design does not result in requirements for tree felling or earthworks to the north-east of Clacks Lane. This is the only part of the application site with any visual linkage to the locally listed building or CA due to the presence of dense tree planting along Clacks Lane, which screens longer views from the rear of properties on Sharps Lane and Hill Rise to the wider application site.

Furthermore, the design responds sensitively to the local landscape context by incorporating native planting into the out of play areas between the tees and fairways, and retaining existing planted buffers along the edges of the application site. This will retain and, in some instances, enhance the quality of the landscape and contribute positively to the settings of the locally listed building and CA.

The design also retains the most valuable Ridge and Furrow landscape located to the north of the application site. thereby retaining and utilising topographical and landscape features of merit.

ARCHAEOLOGY

In terms of archaeology, the applicant has submitted an archaeological field evaluation report, following initial concerns raised by GLAAS. The evaluation has demonstrated that the golf course contains significant archaeological remains of prehistoric and medieval date and has clear potential for further discoveries. The remains can be considered non-designated heritage assets of local to regional significance but nothing of national importance equivalent to a scheduled monument has been found.

Historic England (GLAAS) advises that the extensive earthworks and drainage could cause serious harm or complete loss of buried archaeological remains as well as causing loss of ridge and furrow. Other aspects of the development could bring some benefits by recognising historic landscape within the new landscape design and providing heritage interpretation. GLAAS however consider that these impacts could be mitigated partly by design to avoid harm in certain areas and partly by further archaeological investigation where harm cannot be avoided. There is also an opportunity to secure public benefit through engagement in the investigations (open days, school visits etc and on-site interpretation

GLAAS therefore recommend a condition requiring a written scheme of investigation (WSI), which shall include the statement of significance and research objectives, and

- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Details of a programme for delivering related positive public benefits
- C. Details of measures to protect areas identified for preservation in-situ during construction
- D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

It is therefore considered that subject to the above mentioned condition, there will be no, or very limited, impacts to heritage assets as a result of the proposed development and the proposals would not conflict with the above mentioned policies.

7.04 Airport safeguarding

Not applicable to this application.

7.05 Impact on the green belt

Paragraph 137 of the NPPF says that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.

Policy G2 of the London Plan 2021 says that the strongest protection should be given to

London's Green Belt.

Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) of Local Plan: Part 1- Strategic Policies (2012) says that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Policy DME1 4 (Development in the Green Belt or on Metropolitan Open Land) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) says that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

The Government's Planning Practice Guidance (PPG) provides advice on whether the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. While it acknowledges that any assessment requires judgement based on the circumstances of the case, it also provides matters that the courts have identified and should be taken into account. In this respect, the PPG states that openness is capable of having both spatial and visual aspects.

Golf Course Reconfiguration

The proposed changes to the landform will not result in any new high points, or ridges, which would break the skyline. All newly raised levels will be accommodated within the existing range of contours. While some 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 would be harmed to a detrimental degree by the proposals, in accordance with relevant policy.

The Driving Range

The driving range bays are integral to the operation and ongoing commercial viability of the golf course. The existing range, a long thin structure, comprises a built footprint of 676.5sqm. The new structure however is slightly smaller in footprint at 671.3sqm - though tapering up to a maximum height of 4.5 metres at its northern end as required to provide sufficient shelter and clearance to golfers. This is slightly higher than the existing structure.

Whilst the old facility contained 40 bays, the new facility will contain 20 bays which are larger. This will meet modern standards; alongside adhering to the demands and flexibility of use. The new facility will also include a ball washing area, teaching bay and video studio, again to bring the facility up to modern day standards.

Whilst the new single storey building proposed at 4.5m is slightly taller at its highest point than the existing driving range, it presents a more compact built form and an overall smaller footprint, that is substantially shorter than the existing facility. The new massing proposed will also be shifted slightly to the north east, closer to the existing houses further consolidating built form. The effect of this will allow for increased transparency and glimpses into the Green Belt from Ickenham Road where, currently none exist, due to the shielding created by the existing driving range building.

The new driving range building will be of a more robust construction than existing, with surrounding planting, landscaping and topography devised to ensure it fully integrates into its context. Accordingly and within the context of this area of the site, whilst the replacement facility will be marginally taller, overall it is considered the new driving range proposed, by virtue of its massing, location and materiality would positively impact openness.

The Car Park

The existing car park comprises a large expanse of hardstanding, and therefore constitutes developed land. It is understood the facility serves the Fairway Public House and Function Space (outside the remit of this application); the rifle range; the driving range; and the golf course. No major reconfigurations or expansions are proposed to this car park, neither are any major changes proposed to its capacity. Accordingly, its retention is considered acceptable.

The Replacement Rifle Range

The existing rifle range, now demolished, comprised a low quality, single storey building with a footprint of 207.3sqm. It was located beyond the red line of this application adjacent to the Chiltern Mainline railway and therefore in the location otherwise ringfenced for the HS2 development. The commencement of HS2 works in this location resulted in the demolition of the rifle range building alongside the loss of land from the golf course. The rifle range can therefore no longer be accommodated in its original position. For this reason, it was agreed and formalised within the Hillingdon Agreement that the applicant will replace the rifle range for the benefit of the existing Rifle Club, alongside reconfiguring the existing golf course, to ensure both functions can continue to operate alongside the HS2 development.

The new rifle range building proposed will therefore be delivered as part of the golf course reconfiguration and is thus included within this application. The new facility will comprise a footprint of 205sqm and a height of approximately 3.2 metres; and has been designed to meet British Standards and modern Health and Safety Requirements. This will secure the longevity of the building for future generations.

In terms of proposed location, the new building will be located at the very edge of the application site, within close proximity to the existing Fairway Public House and only a short distance, some 60m, to the east of the existing rifle range. This represents only a minimal reconfiguration in the context of the overall application site and compacts the spread of developed land across the site.

Conclusion

It is not considered that post construction, the proposal would have a long or medium term negative impact on the openness of the Green Belt, subject to satisfactory land reinstatement at the conclusion of the works. The proposed development would therefore not conflict with paragraph 137 of the NPPF, policy DMEI 4 and DMEI 6 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020), Policy EM2 of the Local Plan Part 1 (2012) and Policy G2 of the London Plan (2021).

7.06 Environmental Impact

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will expect proposals for development on contaminated land to provide

mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

Policy DMEI 12 (Development of Land Affected by Contamination) of the Local Plan: Part 2 - Development Management Policies (2020) says that the Council will support planning permission for development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely used through remediation.

Land contamination

The Environment Agency has confirmed that it has no objections for the reuse of excavated material from the HS2 works as non-waste under the CL:AIRE Definition of Waste Code of Practice (DoWCoP), as outlined in the Interim/Outline Materials Management Plan (MMP), and supporting information, for the proposed works at Ruislip Golf Course, providing that the CL:AIRE Definition of Waste Code of Practice is followed in full. As such, the application is considered a non waste development and the Mayor of London does not therefore need to be consulted as a waste application.

The Council's Contamination officer notes that this development is associated with the HS2 High Speed Rail proposals and as such does not have specific comments. However the Council wishes to ensure that the land continues to be suitable for use in the future. A condition is therefore recommended to ensure that no contaminated soils or other materials shall be imported to the site. All imported soils for engineering/ landscaping purposes shall be clean and free of contamination. Before any part of the site is occupied all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted in the form of a suitable validation and verification report for approval in writing by the Local Planning Authority. This has been conditioned.

Ground Water Protection

In line with Policy DMEI 11 of the Hillingdon Local Plan: Part 2, the Geoenvironmental Desktop Study has considered potential risks to the Source Protection Zone 1 (inner zone), located in the western part of the application site. The Study found that the contamination risk to groundwater resources is very low.

Based on the site history and available ground investigation data, it is not considered likely that significant sources of ground contamination will be encountered on the application site during construction. The proposed development is unlikely to extend more than 3m into the subsurface and furthermore, significant clay deposits identified across the application site will provide adequate protection to the principal aquifer and associated groundwater abstractions, both during construction and operation.

The Environment Agency raises no objections, subject to a number of conditions, which are set out in full in the 'External Consultees' section of this report.

On this basis, subject to the conditions requested by the EA and LLFA, it is considered that the impact of the development on contamination will be controlled, in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMEI 12 (Development of Land Affected by Contamination) of the Local Plan Part 2: Development Management Policies (2020) and Policy SI 1 of the London Plan (2021).

7.07 Impact on the character & appearance of the area

Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. Policy DMHB 11 Local Plan: Part Two

- Development Management Policies (2020) advises that all development will be required to be designed to the highest standards and incorporate principles of good design. Policies D1 and D4 of the London Plan states that development design should respond to local context.

Options for the redevelopment of the golf course were considered in a Feasibility Study (May 2015) prepared by Gaunt Golf Design. This included an 18 hole option, however the size of the site meant that this option did not result in a high quality course and the Council selected Option 3 as the preferred design option. This option provided a high quality nine hole course, along with academy and practice facilities. This has formed the basis for this design.

The reconfigured golf course includes the replacement of both the existing golf driving range and the rifle club building with new state-of-the-art facilities. The current facilities are both single storey structures which, having been constructed a considerable time ago, fail to meet modern operational standards. Furthermore, given its size, the existing driving range building is under-utilised.

The applicant submits that the provision of planting and landscaping which requires minimal maintenance is a guiding principle which has informed the design as set out in the Design and Access Statement.

It is considered that the proposed development will improve the overall setting of the course, and result in habitat creation, including new woodland areas with scrub and grassland understorey. New and improved Public Rights of Way (PRoWs) would also be provided through the site, improving accessibility and providing enhanced access to open space.

The replacement buildings will be constructed to a high quality standard, both to ensure robustness and to also respect the Green Belt context. They will both be single storey structures. The rifle range will be finished with metal profiled cladding, which will be both strong and aesthetically pleasing. A comprehensive landscaping strategy coupled with the building's location to the very south corner of the site will ensure that it does not appear incongruous or harmful to the location's visual amenity.

By its very nature, the golf driving range is substantially more exposed to long views across the Site. Much like the rifle club building however, the driving range has been designed to ensure it is minimally sized whilst still fulfilling the Council's requirements. Narrower than the existing building to allow for increased views through the site, it will be finished with a wood cladding - ensuring it stands the test of time whilst complementing the materiality of the wider landscape.

On this basis, the development proposal is considered to be acceptable in terms of its impact on the character and appearance of the area, in accordance with the Hillingdon Local Plan, the adopted London Plan (2021) and the NPPF.

7.08 Impact on neighbours

Policy DMHB 11 Local Plan: Part Two - Development Management Policies (2020) advises

that proposals should not have an adversary impact on the amenity, daylight and sunlight of adjacent properties and open space. Policy DMHD 1 also requires that there is no unacceptable loss of outlook to neighbouring occupiers.

Given the nature of the proposal, the development is not expected to have an adverse impact on the existing residential amenity of surrounding properties with regards to overlooking, privacy, daylight or sunlight.

Opening hours would be similar to existing. The golf course and academy course would operate during daylight hours, and the driving range opening hours would be similar to the existing hours, Monday to Thursday 09:00 - 21:00; Friday to Sunday 09:00 - 19:30. The rifle range will continue to operate the same hours Monday to Friday 19:00 to 22:00 and Saturday 09:30 to 15:30. This has been conditioned, in order to protect the residential amenity of surrounding occupiers.

The reinstatement of the site following completion of the works means the leisure amenity of the open green areas and the public footpaths will be fully restored, in alignment with Hillingdon's Core Policies EM4 and CI2, and London Plan Policy G4.

Post construction, assuming that there will be minimal effect upon overall usage of the golf course, there are not expected to be any disruptive effects to local residents as a result of the proposed development. Overall, it is considered that the proposed development will result in permanent, beneficial effects upon neighbourhood quality and accessibility.

The applicant submits that the amenity of surrounding properties will be protected, including through appropriate noise limits and mitigations during construction. The impact of the development during the construction phase, in terms of noise and air quality impacts has been addressed in relevant sections of this report.

Network Rail has requested a number of conditions to safeguard the operations of the adjoining railway line. These are set out in the 'External Consultees' section of this report and are reflected in the officer recommendation.

7.09 Living conditions for future occupiers

Not applicable to this application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Hillingdon Local Plan Policy DMHB 12 requires development to be well integrated with the surrounding area, providing safe and direct pedestrian and cycle movement through the space and using good quality materials undertaken to a high standard. Policy DMT 2 states that development proposals must ensure that safe and efficient vehicular access to the highway network is provided to the Council's standards.

A Transport Statement has been produced and submitted with this application, which considers the impact of the development on the existing transport network.

Traffic Generation

Traffic surveys undertaken to inform the Transport Statement found that, currently, the total AM peak vehicular two-way movements for the application site equate to 21, with 42 in the PM peak hour and a total of 57 during the Saturday peak hour. It is anticipated that the proposed development will result in a modest increase in visitor trip generation owing to the changes in the maximum throughput capacity of the golf course. As such, the impact of the development proposals on the local transport network will be limited, resulting in a

maximum increase in vehicle flows on B466 Ickenham Road of no greater than 3 per cent during operation of the proposed development.

In terms of the construction, 50,000m³ of excavated material from construction of the West Ruislip Portal, part of the HS2 development, will be used on the golf course to achieve its design ambition. This will limit the requirement for additional vehicle movements during construction of the golf course and furthermore, significantly reduce vehicle trips required to remove material from the HS2 site. Taking this into consideration, the Transport Statement found that the proposed development will generate approximately 32 vehicles movements per month, which is just over one per day on average, which will fluctuate across the construction period.

In line with the supporting text for Policy DMT 7 of the Hillingdon Local Plan: Part 2, construction management and logistics measures will be implemented to ensure compliance with planned routing, delivery, access and safety standards. Construction vehicle movements associated with the golf course will be considered by HS2 Ltd. as part of the overall number of construction vehicle movements and limits which these are subject to.

The Highway Engineer has reviewed the Transport Statement and notes that the overall levels of percentage uplift during the operational phase would directly impart additional activity within Clacks Lane and its junction with Ickenham Road, which may lead to vehicular conflict as a result. These roadways are considered highly sensitive and as the accident record for this specific location is considered as good, the Highway authority have a duty to maintain this status quo.

It is therefore recommended that a 3-stage road safety audit (RSA-stages 2,3 and 4) is undertaken at this location in order to take stock of the existing arrangement with identification of any layout and/or safety enhancements that can be introduced prior to or post-construction. This exercise would also be pertinent to construction vehicle activity in this vicinity. The RSA will be secured via a planning condition.

Notwithstanding the low volume of construction traffic on the highway network, the Highway Engineer recommends that, the applicant submits a traffic management plan specific to the proposed works which should indicate the measures to reduce the impacts on peak hour traffic (0730-0930 and 1630-1830) and include workforce numbers with activity profiles, details of access and egress management at the site, and general traffic management arrangements, together with a comprehensive Highway network monitoring regime applied throughout the period of works. This can be secured by condition.

Parking Provision

160 parking spaces are already provided in a car park adjacent to the club house (accounting for the 40 which have been removed due to HS2 development). It is estimated that the proposal could result in up to 92% peak occupancy within the 160 - space car park. This figure is based on a worst-case scenario and a level of spare capacity would still be in evidence. The Highway Engineer considers that the predicted peak occupancy is, on balance, containable within the car park. Given the proposed development will result in a minimal change in visitor trip generation, it is anticipated that these will cater adequately for future demand.

The Highway Engineer also recommends conditions regarding the provision of electric

charging points and disabled parking.

Subject to the above planning conditions, the Highway Engineer is satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies of the London Plan (2021).

7.11 Urban design, access and security

ACCESS

The NPPF supports the achievement of healthy, inclusive and safe places which enable and support healthy lifestyles, for example through the provision of safe and accessible green infrastructure. This is reiterated in the London Plan which encourages the creation of new green infrastructure and the integration of this into London's wider network green infrastructure network and the public realm.

The existing site is a strategically important piece of green infrastructure, permeating into the urban form of London. It serves an important recreational functional, both within Hillingdon and within the wider sub-region. It incorporates two longer distance footpaths, the Celandine Route and the Hillingdon Trail, which provide public access to green spaces and valued habitats, including the SINC.

The applicant submits that accessibility is one of the key principles underpinning the design for the proposed development. The proposed development will enhance the legibility, accessibility and safety of the existing Public Rights of Way (PROWs) across the application site. In line with the NPPF, to ensure this important piece of green infrastructure is safe and accessible, the design incorporates minor realignments of some paths away to ensure they do not cross the proposed fairways, as well as improvements to the surfacing of the Hillingdon Trail within the application site to ensure year-round accessibility for all.

The creation of a new PROW through the southern part of the application site will further improve public access, and furthermore will enhance the connection between the site and the wider public realm in line with the London Plan.

It is therefore considered that the proposed development offers enhancements to Ruislip Golf Course and will provide a high-quality golfing experience for both local residents and visitors from further afield. As highlighted previously, the provision and enhancement of recreational facilities is supported by NPPF, the London Plan and Local Plan: Part 1 Policy CI2.

7.12 Disabled access

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a protected characteristic, which includes those with disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that might impede disabled people

The Design and Access Statement accompanying this application sets out how inclusive and accessible design principles have been incorporated into the design for the proposed development. In particular, the proposed improvements to the accesses around the golf course will ensure that the facilities are safe and fully accessible to all, with provision for both wheelchair users and buggies.

The proposed development also contributes to improved public accessibility east-west and north-south across the site through the creation of a new public footpath along the southern boundary of the development site, as well as a series of improvements to existing public footpaths to improve their surfacing and ensure easier wayfinding.

Provision is already made for accessible parking in the existing car park, which will not be altered as part of the proposed development.

In line with the London Plan, the proposed development is designed to be fully accessible, both on foot through the provision of enhanced, surfaced footpaths throughout, and via buggy. The new academy course and range of practice facilities will create valuable new opportunities for participation in golf, fostering a healthier and more sustainable local community. This also accords with London Plan, which emphasises that new development should be designed and managed in ways that improve health and promote healthy lifestyles.

For the reasons set out above, it is considered that subject to suitably worded conditions, the proposed development would be in accordance with The Equality Act 2010 and with relevant London Plan policies, Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and the Accessible Hillingdon Supplementary Planning Document (September 2017).

7.13 Provision of affordable & special needs housing

Not applicable to this application.

7.14 Trees, landscaping and Ecology

Hillingdon Local Plan Policy DMHB 14 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit, and Policy DMEI 7 requires loss of biodiversity to be replaced with features of equivalent value on-site. Core Policy BE1 requires all new development to be designed appropriately to the context of Hillingdon's landscape. London Plan Policy G6 states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. London Plan Policy G7 requires trees and woodlands to be protected and maintained.

In line with Policy DMHB 14 of the Hillingdon Local Plan: Part 2, a Tree Survey and Arboriculture Survey Report has been produced and accompanies this planning application.

The retention of the most valuable trees has been a key design principle from the outset. The design has sought to minimise the felling of trees/shrubs wherever feasible, and in particular has incorporated the findings of relevant technical assessments including the Ecology Assessment and the Arboricultural Survey. The topographical design of the golf course was developed to ensure the most valuable trees are retained on site. The net number of trees on the application site will be higher following implementation of the proposed development and native species will be used throughout.

While some tree felling will be required to incorporate the new nine hole golf course, the evolution of the design has sought to minimise this wherever possible. Furthermore, a total of 153 new trees and 9,171 tree 'whips', all native species relevant to the local context, will be planted as part of the proposed development. This will ensure a substantive net increase in the number of trees on the application site. This satisfies and surpasses the requirements of the London Plan for trees of value to be retained and losses replaced; similarly, the requirements in Policy DMHB 14 of the Hillingdon Local Plan: Part 2.

The Tree and Landscape officer has reviewed the submitted information and notes that the design and layout of the new golf course, which comprises undulating topography and associated landscape, has been designed in consultation with the Green Spaces and golf course managers. The Green Spaces Team raises no objections to the scheme subject to relevant landscaping conditions which are included in the officer recommendation.

The proposed development is therefore considered to be in accordance with Hillingdon's Local Plan Policy DMHB 14, DMEI 7, Core Policy BE1, and London Plan Policies G6 and G7.

ECOLOGY

Policy DMEI7 of the Local Plan Part 2 sets out a similar approach for developments on or near sites of ecological value. Applicants must show that developments will not have unacceptable impacts and sets out a set of principles to be followed if harm to biodiversity cannot be avoided.

Policy G6 of the London Plan states that biodiversity enhancement should be considered from the start of the development process. Ecological habitat retention, enhancement and creation are key principles which have underpinned the design process for the proposed development from inception. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity a mitigation hierarchy set out in the Plan should be followed. This could include a requirement to provide offsite mitigation.

This is particularly pertinent in the context of the application site, which includes the West Ruislip Golf Course and Old Priory Meadows Nature Conservation Site of Borough Grade II Importance (SINC). This designation was taken into account from the outset, and the design has sought to mitigate effects upon the SINC and, where possible, avoid development within or adjacent to the designated area. This is in line with Policy EM7 of the adopted Hillingdon Local Plan: Part 1 .

An Ecological Assessment is provided which accompanies this planning application.

The design has evolved in response to comprehensive ecological surveys which, contained within a compiled Ecological Assessment, accompanies this planning application. Where particular challenges have been identified through these assessments, these have been mitigated or ameliorated through design, in particular:

- the incorporation of a 30m buffer zone around an identified badger set in the north-eastern part of the application site, with no works to be undertaken within this area;
- the retention of trees highlighted as having the highest ecological habitat value, in particular those with the potential for bats.

The design incorporates specific interventions which will enhance the biodiversity value of the SINC and the wider application site, specifically:

- incorporating new native under storey planting typologies such as rough grass and scrub into out of play areas;
- creating new ecological corridors between the proposed tees and fairways in order to better link existing habitats;
- establishing new wetland and water meadow habitats around the realigned Ickenham

Stream and River Pinn floodplain.

Water Vole

The Environment Agency (EA) after initially raising objections regarding water voles, are now satisfied with the additional information sent by the applicant dated 22.03.21 and the proposal to undertake a water vole survey during spring 2021. The EA has now removed its previous objection and has no objection to the planning application subject to planning condition being placed on any planning permission granted, requiring an updated survey to identify the presence of water vole. If water vole are found to be present, a plan detailing their protection shall be submitted to and agreed in writing with the Local Planning Authority. This is in order to protect the water vole and its habitat within the development site, and to avoid damaging the site's nature conservation value.

Great Crested Newts

The creation of a pond on the western area of the Golf Course will accommodate great crested newts under licence from Natural England. The pond requires long term maintenance and annual assessment to ensure continued compliance with the Natural England licence.

HS2 has agreed to commuted sums relating to the creation of the new Great Crested Newt pond (subject of this application) within the Golf Course. It was also agreed that these sums would be the subject of a Section 106 agreement.

Conclusion

Natural England raise no objections to the proposed works and it is considered that subject to the implementation of the recommendations in the Ecological Report, which have been conditioned, the proposal will avoid significant impacts to ecology and habitats. In combination, the ecological mitigation and enhancements incorporated into the design are considered to meet the requirements set out in national, regional and local plan policies. In particular, the proposed development will protect and enhance the identified SINC, as well as habitats and features of biodiversity value throughout the wider application site, in line with Policy EM7 of the adopted Hillingdon Local Plan: Part 1 and Policy DMEI 7 of the Hillingdon Local Plan: Part 2.

7.15 Sustainable waste management

DMEI 13 Importation of Material Requires submission of a monitoring plan for all development proposals that include importation of material, as well as a written report on commencement of the disposal operation.

The new design for the golf course aims to create an interesting and challenging course while also dealing with drainage and flood issues. This results in some cut and fill across the site. In general levels rise and there is a deficit of 50,000m³ of material to achieve the design ambition.

As part of the HS2 works, the West Ruislip Portal will be built adjacent to the site. Construction of the Portal will generate a considerable quantity of excavated material, mostly natural ground. This material will be used on the golf course to achieve the design ambition.

The data obtained from the ground investigation at the Portal site has not identified any

significant contamination. It is proposed that the excavated material are reused using the CL:AIRE Definition of Waste Code of Practice under a full Materials Management Plan in accordance with the HS2 Materials Management Plan Framework. This approach has been agreed with the Environment Agency (EA).

As stated above, the Environment Agency has confirmed that it has no objections for the reuse of excavated material as non-waste under the CL:AIRE Definition of Waste Code of Practice (DoWCoP) as outlined in the Interim/Outline Materials Management Plan (MMP) and supporting information, providing that the CL:AIRE Definition of Waste Code of Practice is followed in full.

A formal Declaration must be submitted to the EA by a Qualified Professional (QP) before any transfer occurs. The decision to use the CL:AIRE Definition of waste Code of Practice is the responsibility of the holder of the materials. The project manager will need to collate all relevant documents; permissions, site reports, MMP etc and consult with an independent QP to confirm that the site meets the requirements and tests for use of the DOWCOP.

If the site meets the tests that materials are suitable for re-use, certain to be re-used, are not excessive in volume and pose no risk to the environment or harm to human health then the QP can make a formal Declaration via CL:AIRE.

A verification report will be required to be completed at the end of the project and a copy submitted to CL:AIRE. Materials not used in accordance with the DoWCoP process in full may be deemed waste and will require a relevant permit for deposit. Materials illegally deposited or deposited at inappropriate sites may be subject to relevant landfill taxes, payable by all parties.

7.16 Renewable energy / Sustainability

Policy SI2 of the London Plan (March 2021) establishes the energy hierarchy for minimizing greenhouse gas emissions, sets targets and advises that boroughs must establish and administer carbon offset funds and Policy SI4 seeks to minimise adverse impacts of development on the urban heat island by addressing impacts of overheating and excessive heat generation.

The landscape maintenance requirements of a golf course generate substantive demand for water. The proposed development incorporates a water harvesting system, including three ponds and three tanks, and an irrigation system. These features will significantly reduce the course's reliance on groundwater and ensure that its water needs can be almost entirely met by water collected and stored on site. The system will have capacity for approximately 14,000m³ of storage, sufficient to irrigate the golf course for 100 continuous days without precipitation.

The proposed development also incorporates measures which will improve the quality of water discharged to the River Pinn as well as the mains sewer system, including filter drains and oil separators around the car park and green keeper's compound.

The remodelling of the golf course will reuse material excavated from the construction of the adjacent HS2 West Ruislip Portal. Material will be transferred directly in between the two sites thereby significantly reducing the number of vehicle movements which would otherwise be required to remove material from the HS2 works.

The design will also involve the reuse of materials on site where possible, for example

using felled trees to create log piles. Additionally, the improvement of PRowS across the site will encourage walking as a sustainable mode of transport.

It is considered that the development will satisfactorily address the issues relating to the mitigation and adaptation to climate change and to minimising carbon dioxide emissions, in accordance with relevant London Plan policies, policy EM1 of the Local Plan Part 1 (2012) and policy DMEI 2 of the Local Plan Part 2 (2020).

7.17 Flooding or Drainage Issues

Policy EM6 (Flood Risk Management) of the Local Plan Part 1 Strategic Policies (Adopted Nov. 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. Policy DMEI 9 Management of Flood Risk applies the development proposals within Flood Zones 2 and 3 and is relevant to this proposal. It requires development proposals to demonstrate that no alternative sites are available in areas of lower flood risk. If this is not possible, the development should be located in the areas of lowest flood risk within the site.

Parts of the application site fall within Flood Zones 2 and 3 on the EA Flood Maps; these areas are considered to have a higher probability of flooding. In line with Planning Practice Guidance requirements and those set out in the London Plan and Policy DMIE 9 of the Hillingdon Local Plan: Part 2, a Flood Risk Assessment was carried out and accompanies this planning application.

Most of the application site (approximately 90 per cent) is within Flood Zone 1 (low flood risk), while the remainder of the application site is within the River Pinn floodplain (Flood Zones 2 and 3) and at a higher risk of flooding. In line with Policy EM6 of the Hillingdon Local Plan: Part 1, those parts of the proposed development that would be vulnerable to flooding have been directed away from Flood Zones 2 and 3. The playable parts of the golf course, which are classified as water-compatible in Paragraph 066 of the Planning Practice Guidance, are limited to Flood Zones 2 and 3a and thus considered to be appropriate development. The parts of the application site within Flood Zone 3b, those areas at highest risk of flooding, are in a natural state and form part of the riverbed. No development is proposed in these areas,

In accordance with the PPG and national standing advice, the development has been designed to ensure that flood risk is not increased elsewhere by: proposing no modifications to the River Pinn; incorporating an additional flood storage area; making no alterations to existing hydrological catchments; and incorporating SUDS techniques into proposed drainage measures.

The NPPF states that SUDS should be incorporated into developments at risk of flooding (unless evidenced as inappropriate), a requirement which is also transposed into Policy SI 12 and SI 13 of the London Plan. This also requires that drainage assists in delivering other policy objectives related to water efficiency and quality, biodiversity, and amenity and recreation.

As set out in the Drainage Report, the drainage system forming part of the proposed development will attenuate surface runoff to a lower rate than would be anticipated if the application site remained greenfield, an enhancement compared with the existing course. Overall, the attenuation volumes provided in the drainage system will attenuate a 1:100 year rainfall event (including climate change (40 per cent) runoff rate) to a greenfield rate, maintaining the playability of the course and access to the PRow in all but the most extreme weather events.

The proposed development incorporates a surface drainage system for the new fairways and out of play areas, and a subsurface drainage system for the greens, tees, bunkers and driving range area. Filter drains will intercept surface runoff and, additionally, oil separators will be installed in the car park and green keepers' compound. These measures will ensure that contaminants are not discharged to the drainage network or, in the case of the green keepers' compound, the sewer system, thus ultimately enhancing the quality of the water discharged into the River Pinn.

A water harvesting system has been incorporated into the design to collect and store water on the application site, including provision of three ponds and three tanks to store water together with flow control outlets. Approximately 14,000m³ of storage capacity will be provided, sufficient to irrigate the course for 100 days without precipitation. This will enhance the efficiency of water usage by Ruislip Golf Course, ensuring that rainwater is collected and reused and reducing the requirement for mains water or groundwater to irrigate the course.

The Flood and Water Management Officer considers that there have been significant improvements in the proposals, removing the ordinary watercourse from flowing into the rainwater harvesting tanks. However there is a small section of land within the redline boundary for which works are proposed which are not within ownership of HS2 or the properties of Hill Rise therefore the drainage strategy will require alteration if this land is not within the applicants control. A condition is therefore requested to ensure the submission of an updated drainage strategy to incorporate these.

It is considered that subject to the above condition, the proposed development meets the requirements for drainage set out in both the NPPF and the London Plan. It also makes a significant contribution towards the requirement set out in Policy EM8 of the adopted Hillingdon Local Plan: Part 1, which requires new development to demonstrate incorporation of water efficiency measures, including water recycling and collection facilities.

It is also considered that the development can satisfactorily address flood related issues, in compliance with the following policies and guidance:

Hillingdon Local Plan: Part 1- Strategic Policies. Policy EM6 Flood Risk Management (Nov 2012), Policies DMEI 9 and DMEI10 of the Local Plan: Part 2 - Development Management Policies (2020); Policies SI 12 and SI 13 of the London Plan (2021), the NPPF (2021).and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

7.18 Noise or Air Quality Issues

NOISE

The NPPF requires developments to mitigate and reduce to a minimum the potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life.

Policy D14 (Noise) of the London Plan states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and non-aviation development proposals should manage noise by avoiding significant adverse impacts on health and quality of life, reflect the Agent of Change principle, mitigate and minimise the existing and potential adverse impacts of noise and improve and enhance acoustic environments.

At a local level, Policy EM 8 (Land, Water, Air and Noise) of the Local Plan Part 1 states that the Council will seek to ensure that noise sensitive development and noise generating

development are only permitted if noise impacts can be adequately controlled and mitigated. Hillingdon's Core Policy BE1 requires all new development to be designed appropriately to protect the amenity of surrounding buildings.

This Application is accompanied by a Noise Impact Assessment, (NIA). The Noise Impact Assessment report covers the use of the proposed rifle range, which replaces Ruislip Rifle Club's range and clubhouse building that has been demolished as part of the HS2 scheme. This includes sound/noise from both weapon fire and from the building services plant.

The NIA report concludes that "The results of the comparison indicate that the maximum predicted sound levels are well below the existing ambient sound levels, by 10dB or greater, based on the current building fabric and layout. As a result, no design changes have been considered to mitigate this sound level further."

The NIA has been reviewed by the Council's external consultants who conclude that whilst the report is lacking information in a number of areas, the assessment does indicate that levels should be very low, and when considered in the context of the proposal being a replacement for a previous facility in the vicinity. It would seem the risk of adverse noise impact is undoubtedly low and further consideration to the design is likely to be unnecessary. However, the following conditions are recommended:

- The development shall be constructed and operated as per the details in the Noise Impact Assessment report for Ruislip Golf Course London S2 (Document no.1MC04-SCJ-EN-ASM-SS05_SL07-000001, Revision C03, dated 28/10/2019), with any relevant features thereafter retained and maintained in good working order for so long as the building remains in use.
- As per the Noise Impact Assessment report for Ruislip Golf Course London S2 (Document no.1MC04-SCJ-EN-ASM-SS05_SL07-000001, Revision C03, dated 28/10/2019), any source of plant noise associated with the operation of the development, at the point of emission to the atmosphere, should be limited to a sound power level of no more than 75 dBA, and where the cumulative plant noise should be no higher than 35 dB LAeq,1h 1 m outside the nearest residential premises. The equipment shall be maintained in good working order for so long as the building remains in use.

Subject to the above conditions, it is considered that the existing and potential adverse impacts of noise from the replacement rifle range will be minimised, in accordance with relevant local and regional policy and national guidance and improve and enhance acoustic environments.

Constructional Noise.

The submitted HS2 London-West Midlands Code of Construction Practice (CoCP)) outlines noise and vibration mitigation measures applied on the HS2 project. Noise mitigations appropriate to the works and in line with HS2 standards will be implemented, including noise and vibration monitoring to ensure and demonstrate compliance with all noise and vibration commitments and the requirements of the HS2 CoCP. This has been conditioned. Construction noise is also covered by separate legislation under Section 61 of the Control of Pollution Noise Act.

AIR QUALITY

Policy EM8 also aims to ensure that development does not cause deterioration in the local

air quality levels. Appropriate air quality management measures will be implemented, in line with the HS2 CoCP standards. In dry weather dust suppression equipment will be used and monitors may be put in place. Machinery and dust-causing activities are to be located away from sensitive receptors, where reasonably practicable. The erection of hoardings along the site boundary will also help to mitigate the spread of dust, along with other measures such as covering materials, deliveries or loads entering and leaving the construction site for the purposes of preventing materials and dust spillage.

The HS2 CoCP also requires all construction vehicles used during construction to be powered by set minimum vehicle emission standard engines in order to mitigate impacts on local air quality. Euro class standards have been set for heavy goods vehicles and light duty vehicles. These mitigation measures have been secured by condition.

7.19 Comments on Public Consultations

At the time of writing this report 15 representations had been received (13 objecting and 2 in support). The main issues raised are summarised in the 'External Consultee' section of this report. Many of the concerns raised have been assessed and addressed by officers in this report in the relevant section. Officers have tried to ensure that the report sections cover objections where they relate to material planning considerations.

7.20 Planning obligations

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

Policy DF1 of the London Plan (2021) requires development proposals to provide the infrastructure and meet relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan.

Policy DMCI 7 of the Local Plan: Part Two (2020) seeks to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Planning obligations are sought on a scheme-by-scheme basis to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

The following Heads of Terms were agreed verbally with the Applicant:

The creation of a pond on the western area of the Golf Course will accommodate great crested newts under licence from Natural England. The pond requires long term maintenance and annual assessment to ensure continued compliance with the Natural England licence. A S106 Agreement is recommended to capture a sum of money from the applicant (HS2 Ltd) to the landowner (the Council). The sum of monies is still under consideration and will be detailed to the Committee via the addendum.

The applicant has agreed in principle to this planning obligation.

7.21 Expediency of enforcement action

Not applicable to this application.

7.22 Other Issues

None.

8. Observations of the Borough Solicitor

General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities

must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

9. Observations of the Director of Finance

Not applicable

10. CONCLUSION

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 the NPPF, Local Plan and London Plan Green Belt Policies, by keeping the land permanently open.

In terms of the impact on the Green Belt, 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 VSC have been demonstrated for the replacement rifle range building.

The application has demonstrated that the proposed development could be completed without detriment to the recognised ecological value of this area, subject to conditions and a S106 Agreement.

It is considered unlikely that the proposals would lead to conditions detrimental to road safety or to traffic congestion on the local road network.

The potential for impact associated with flood risk and drainage has been assessed and it is considered that the development should not, in principle, lead to any negative effects, subject to conditions.

Subject to the conditions, it is considered that the impact of the development on contamination will be controlled, whilst the archaeological position will be safeguarded.

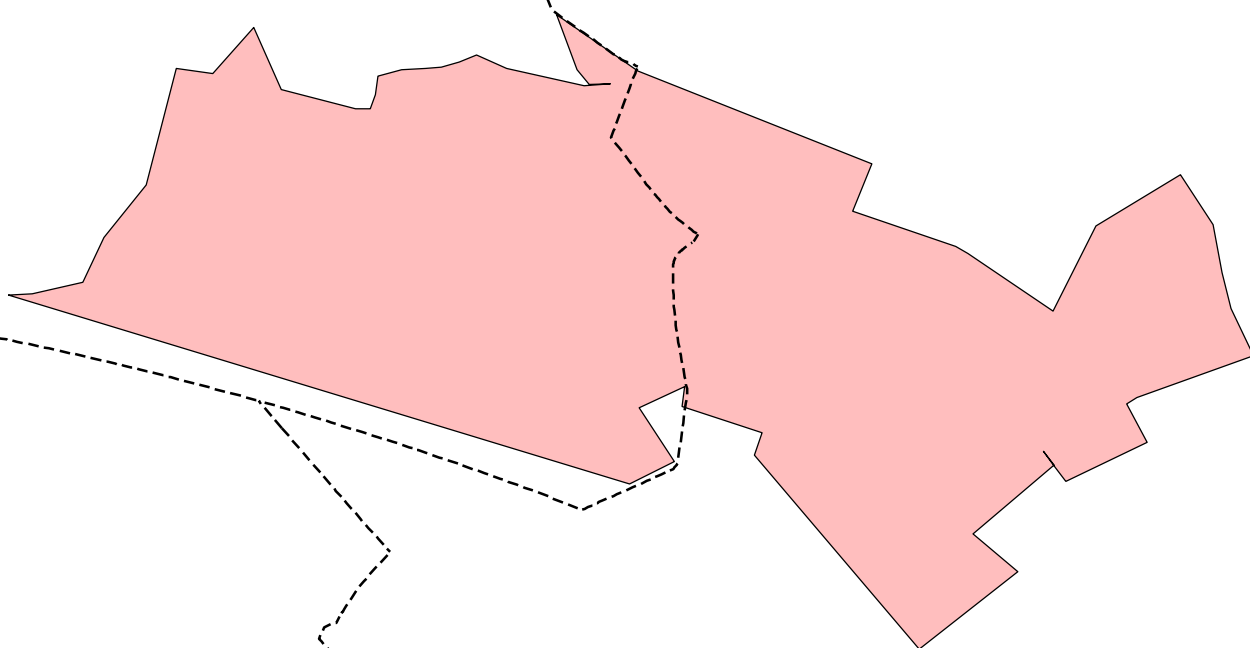
The proposed development is in accordance with the policies of the development plan and it is considered that planning permission should be granted.

11. Reference Documents

The Hillingdon Local Plan: Part 1- Strategic Policies (8th November 2012)
The Hillingdon Local Plan: Part Two - Development Management Policies (2020)
London Plan 2021
National Planning Policy Framework (NPPF)
West London Waste Plan (2015)
Council's Supplementary Planning Document - Air Quality

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**Notes:**

 Site boundary

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Site Address:

Ruislip Golf Course

Planning Application Ref:

10737/APP/2020/3359

Planning Committee:

Major

Scale:

1:8,000

Date:

December 2021

**LONDON BOROUGH
OF HILLINGDON**
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