

A stylized orange map of the East Hants region is centered on a dark purple background. A small black silhouette of a golf club is positioned over the map. The text "East Hants Golf Club" is written in white, bold, sans-serif font across the center of the map.

East Hants Golf Club

Planning, Design and Access Statement - February 2025
(Incorporating Statement of Engagement and Sustainability)

**Gillings
Planning**

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East Horton Golf Club, Mortimers Lane, Fair Oak, Eastleigh

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Contact:

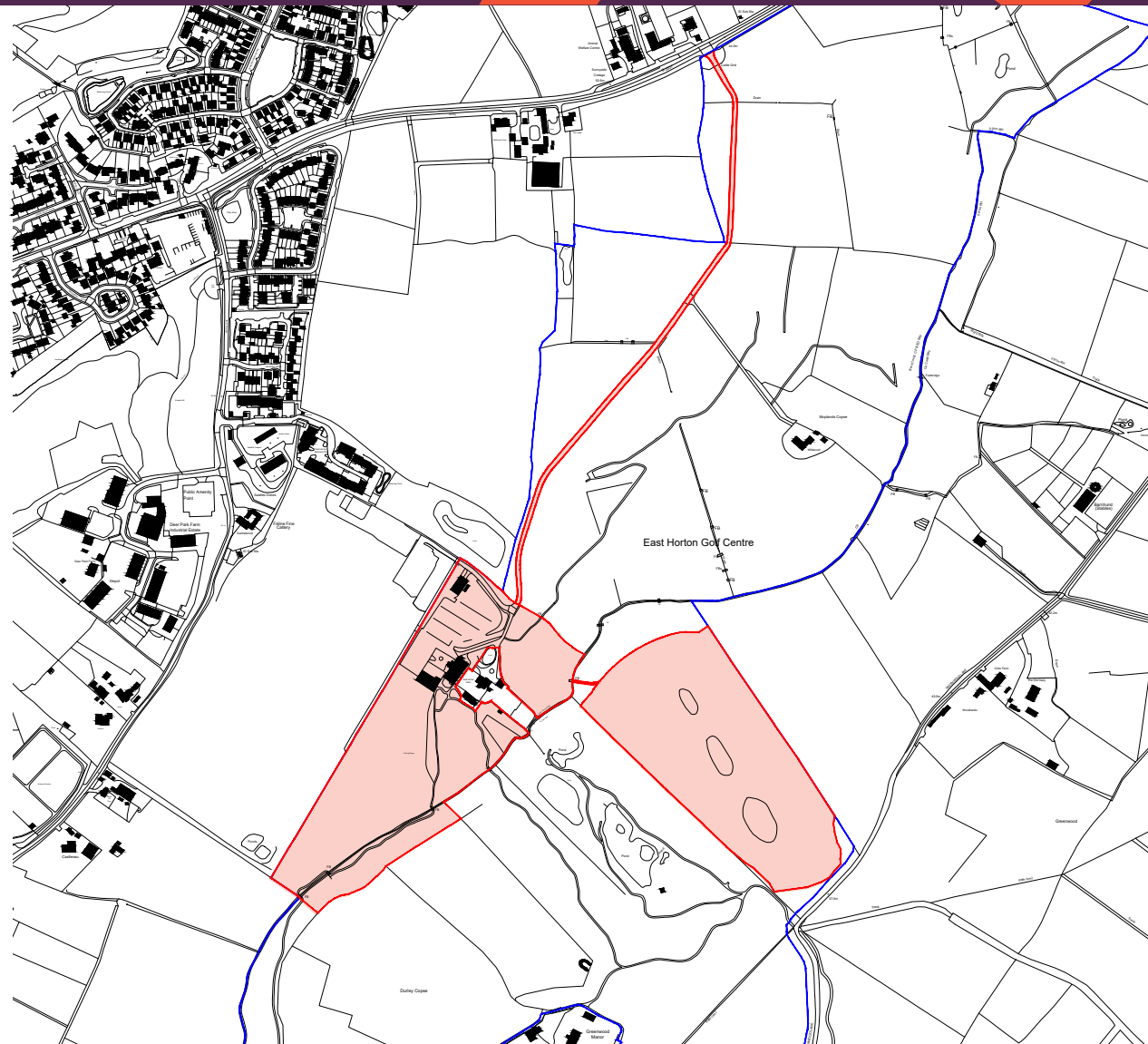
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Project Ref: EXDE1001

Date of issue: February 2025



Introduction



1.1 This Planning Statement (incorporating the SCI), prepared by Gillings Planning on behalf of the Bastian Family (“the Applicants”), is submitted in support of a hybrid application for the following on Land at East Horton Golf Club, Mortimers Lane, Fair Oak, Eastleigh SO50 7EA:

Phase 1 (Greenwood Course)

Full planning permission for the following works:

- Closure and re-planting of 1st Fairway
- New 1st Tee Box and new 1st Fairway along existing Driving Range
- Improved 18th Green
- Closure of existing Driving Range; reprofiling to create a swale and landform; replanting – all to create a new Garden, walkway and wildlife areas along with an attractive edge to the new 1st Fairway
- Accessibility improvements
- Creation of swales and drainage to reduce waterlogging and improve drainage

Phase 2 (Parkland Course)

Full planning permission for the following works:

- Closure of holes 14, 15 and 18
- Reprofilng and landscaping to create a new 300 yard driving range
- Creation of swales and drainage to reduce waterlogging and improve drainage

Outline planning permission for the following works with all matters reserved except for access:

- Construction of a new Driving Range building

1.2 The site is split between two different planning authorities with Phase 1 of the scheme (full application) within the jurisdiction of Eastleigh Borough Council (EBC) and Phase 2 (part full / part outline) within the jurisdiction of Winchester City Council (WCC). Therefore this statement includes reference to policies for both.

1.3 Based on the above, the description of development for which planning permission is sought is as follows:

‘Hybrid application seeking permission for Phase 1, Greenwood Course: Closure of existing driving range and reprofiling of land to create landform and swale with associated landscaping and drainage infrastructure to provide woodland planting and garden space; new 1st tee box and 1st fairway and improvements to 1st green, enlargement of 18th green, landscaping drainage infrastructure; and other associated works (full). Phase 2, Parkland Course: Closure of 14th, 15th and 18th holes and construction of new driving range building (outline with all matters reserved except for access); reprofiling of land to form new driving range target greens and swale with associated landscaping, drainage infrastructure and other associated works (full)’.

1.4 This Statement provides a planning analysis to demonstrate that the submitted proposals are acceptable in planning terms and in accordance with relevant planning policy and guidance.

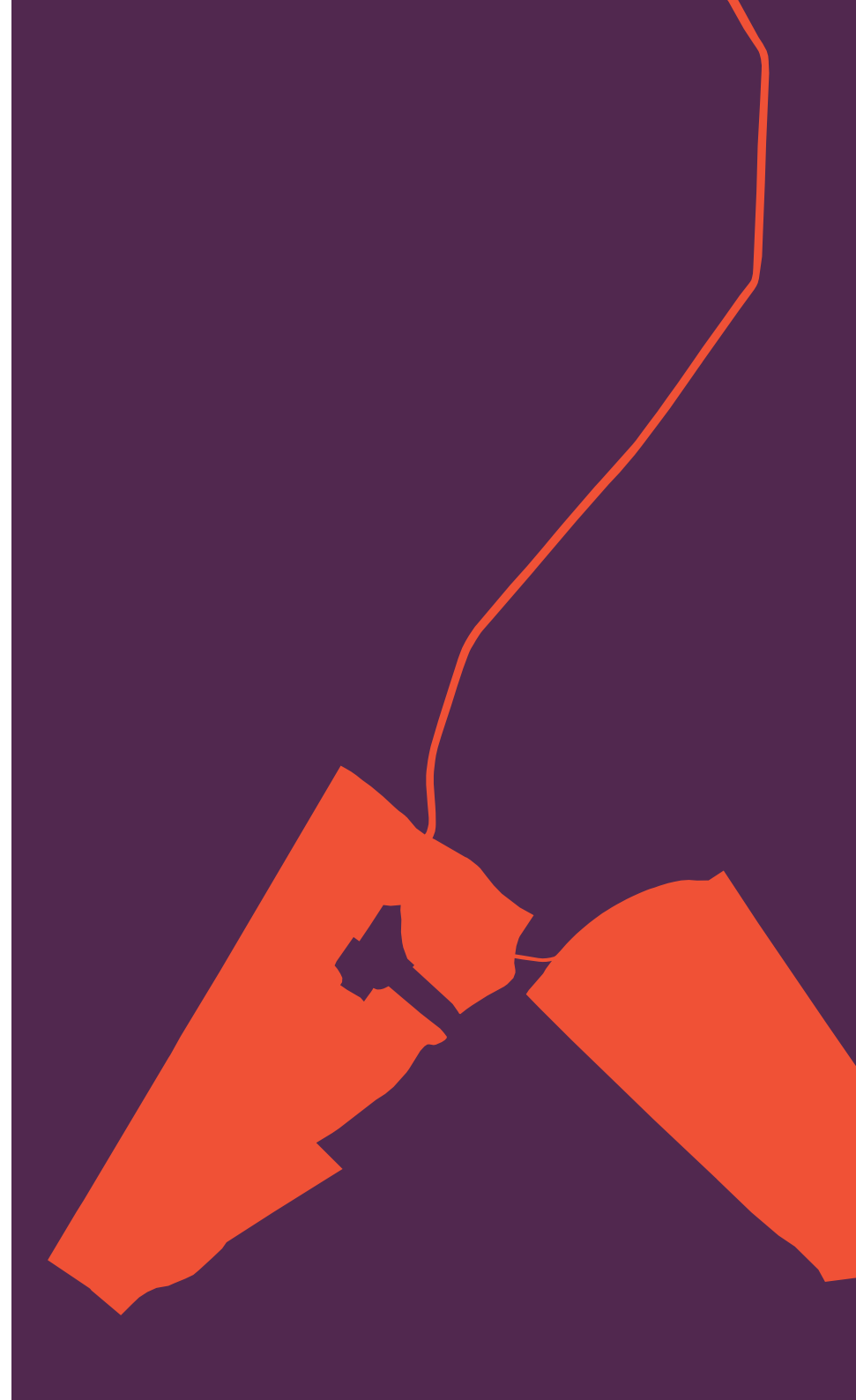
1.5 **Table 1.1** below sets out the documents submitted in support of the planning application which should be read alongside this Planning Statement. The plans and drawings are listed within the covering letter for the planning application submission.

Table 1.1: Schedule of Supporting Documentation

Document	Technical Consultant
Arboricultural Survey and Arboricultural Impact Assessment	ArborEco
Archaeological Desk Based Assessment	Thames Valley Archaeological Services
Application Plans	KSA
Biodiversity Checklist, ecological surveys and BNG strategy	Ecosa and Phillips Ecology
Construction Environment Management Plan	Exdell Ltd
Construction Noise and Vibration Assessment	24 Acoustics
Drainage Strategy incorporating Drainage Plans, Foul Drainage, Surface Water Drainage and Sustainable Drainage Details	Odyssey
Ground Investigation	Ground & Water
Landscape Design and LVIA	Deacon Design
Planning Application Form and ownership certificate	Exdell Ltd
Transport Statement	Nick Culhane Highway Consultant
Topographic Survey	IRUK

1.6 The remainder of this statement is structured as follows:

- Section 2: Site Location and Description (including Planning History)
- Section 3: Development Proposals
- Section 4: Statement of Engagement
- Section 5: Planning Policy Context
- Section 6: Planning Analysis
- Section 7: The Planning Balance



Site Location and Description

2

Site Location

2.1 The application site comprises part of East Horton Golf Course (EHGC) with a site area of 13.67ha. Specifically it incorporates the following areas:

- Land associated with the existing driving range, clubhouse and groundkeepers store.
- Land associated with the 1st hole tee box, fairway and green on the Greenwood Course.
- Land associated with the 18th hole green on the Greenwood Course.
- Land associated with the 14th, 15th and 18th hole on the Parkland Course.
- The existing access from Mortimers Lane.

2.2 Established in 1992, EHGC is a longstanding, well used facility in this location set within an expansive natural landscape covering 260 acres of land. The site consists of maintained grass and vibrant green fairways stretching across the landscape providing three different courses for all levels of players. Throughout the site are large woodland areas, lakes and wildflower planting as well as varying ground

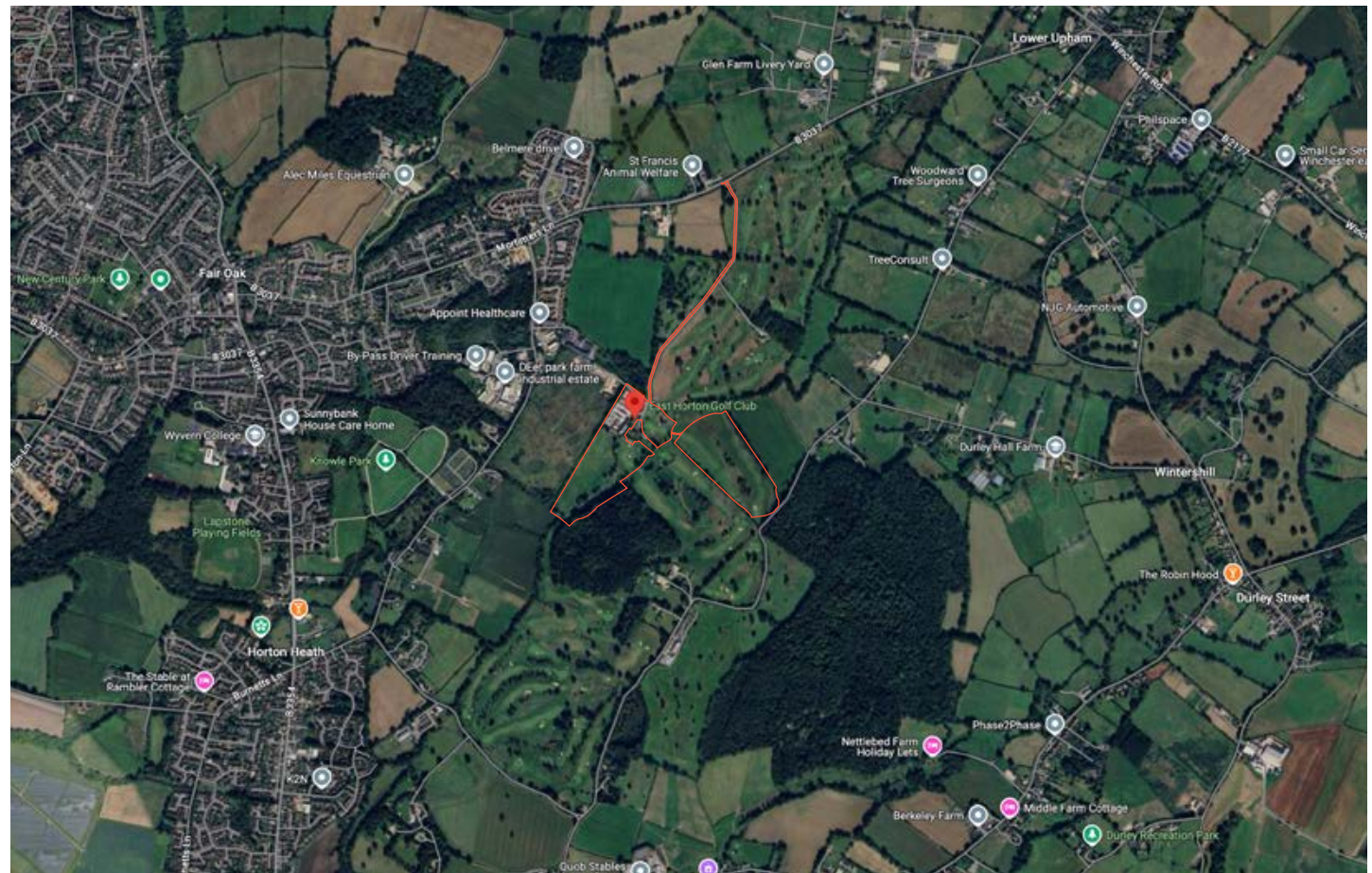


Image courtesy of Google

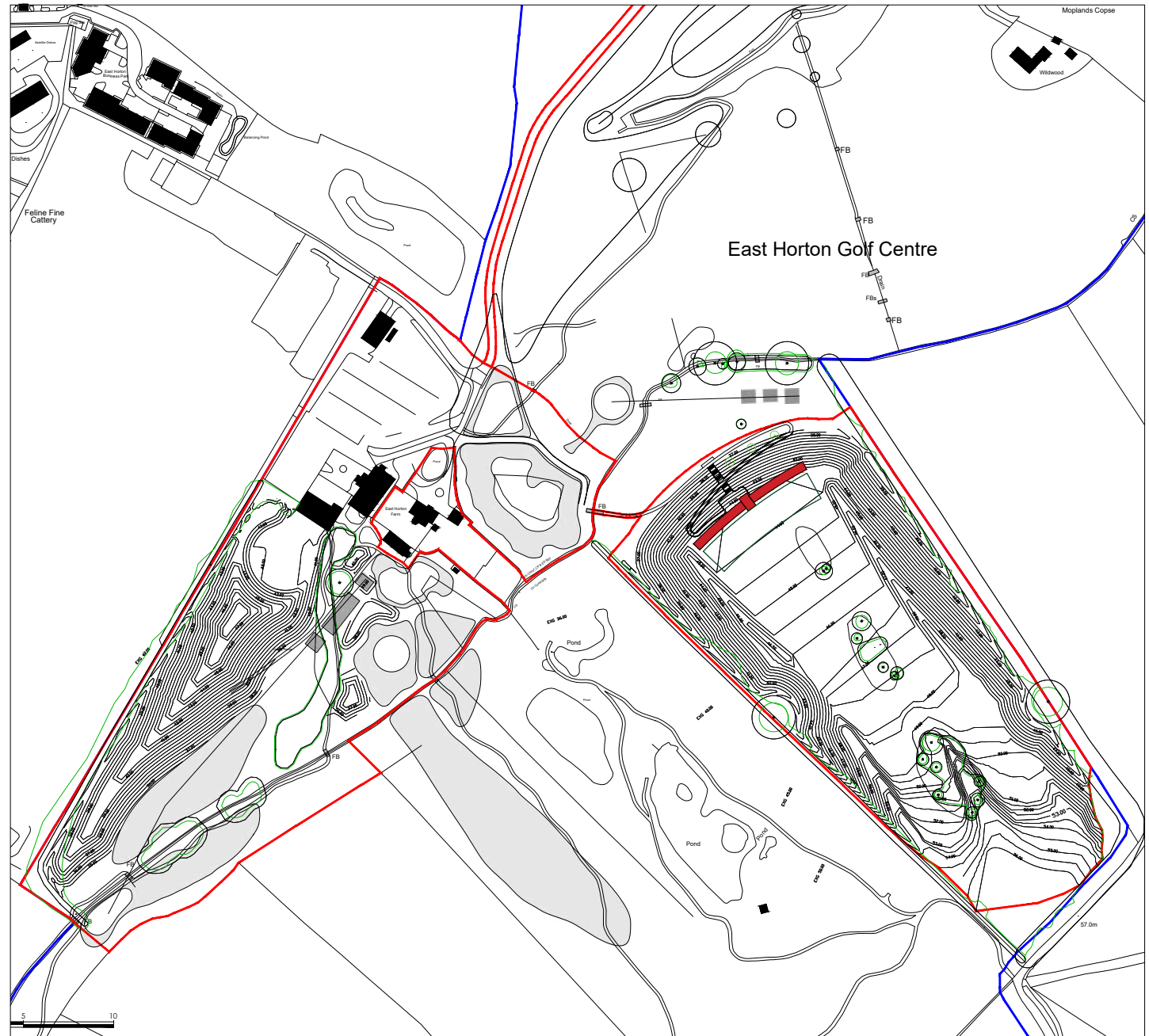
levels. There is also a fully floodlit driving range, parking areas, maintenance buildings and a club house for members and visitors to socialise.

2.3 The wider golf course incorporates the following:

- 2 nr. 18-hole courses, a 9-hole par-3 course and driving range
- Golf shop, clubhouse and facilities
- Buggy store
- Fully licenced bar (Greenside Bar)
- Fully licenced function rooms and facilities with kitchens
- Groundskeepers store with temporary facilities attached

2.4 Originally established in 1992 as an 18-plus 9-hole facility, EHGC was extended to provide an additional 18-hole golf course in 1994. The groundskeepers store was constructed in 1998 and the clubhouse was constructed in 1999 through the conversion of an existing barn. The Greenwood course was extended in 2009 through acquisition of additional land in the jurisdiction of WCC.

2.5 EHGC is a significant local employer with 50 permanent staff in addition to seasonal support staff employed on site where required. 75,000 to 85,000 tee times have been booked in the past 12 months by members and visitors and in 2024, 800 members were registered. The facilities on site also provide an attractive and popular setting for weddings and other events with 10,000 guests accommodated in the past 12 months and an average of 120 events per year.



Location Plan



2.6 Since the end of 2020, EHGC has seen unprecedented demand for both golf and events including weddings and conferences. At present, bookings are being made 3 years in advance and as this demand continues to increase, there is a pressing need to invest in the existing facilities.

2.7 The wider area is characterised by open countryside to the north, east and south of the site with the east providing a more urban appearance. The site is located approximately 1 mile of Fair Oak village with Eastleigh town centre located further to the east.

2.8 While the site is set within the countryside Fair Oak village provides a small number of local facilities including convenience stores, a public house, pharmacy and small cafes/bakery. In addition, there

is good accessibility with bus stops along Mortimers Lane providing links to Winchester and Fareham where further amenities are available.

2.9 Access is from Mortimer Lane via an existing long private driveway that provides open views across the golf course. Parking is provided via a central car park adjacent to the clubhouse.

2.10 There are no protected trees or public rights of way within the red line for this application.

2.11 The site is in close proximity to the following sites:

- Durley Copse SINC / Ancient Woodland to the south east.
- Land at Knowle Lane, Fair Oak to the north west.

2.12 There are no public rights of way on the application site.

2.13 Some small parts of the site are within Flood Risk Zone 3 due to a watercourse running through the site which sits between Phase 1 and Phase 2.

2.14 Two Grade II Listed Buildings are located outside of the site, adjacent to the Phase 1 and known as East Horton Farmhouse and Barn South East of East Horton Farmhouse.

Planning History

2.15 A review of the Council's (available) online records confirms the following planning history for the site as set out in table 1.2 below.

Table 1.2: Relevant Planning History for the site (EBC)

Application reference	Description of development	Decision
Z/17252/012/00	Construction of golf course, bowling green, clubhouse/shop/steward's flat, maintenance store, car park and new access.	Approved January 1990
Z/29759/002/00	Conversion and extension of barns for golf clubhouse and maintenance store, construction of car park and alterations to access.	Approved May 1991
L/29759/004/00	Change of use of barn to golf course maintenance store.	Approved October 1991
Z/29759/003/00	Construction of 18 hole golf course and golf driving range.	Approved April 1992.
Z/29759/007/00	Change of use of barn to form reception, changing rooms, pro shop, trolley stores and tea room for temporary period of 2 years.	Approved April 1992.
Z/29759/002/00	Conversion and extension of barns for golf clubhouse and maintenance store, construction of car park and alterations to access.	Approved April 1992
Z/29759/008/00	Erection of 8 floodlights for golf driving range.	Approved December 1992
Z/29759/009/00	Change of use and laying out of nine hole pitch and putt golf course.	Approved October 1993
Z/29759/011/00 (planning) / Z/29759/002/00 (Listed Building Consent)	Alterations and use of barn as bar for temporary period terminating 31st August 1997.	Approved September 1994
Z/29759/013/00 (planning) / L/29759/014/00 (Listed Building Consent)	Continued use of barn as bar.	Approved October 1997
Z/29759/015/00	Alterations and extension to barn to form golf club house.	Approved December 1997
Z/29759/016/00 -	Erection of replacement maintenance building and construction of car parks.	Approved July 1998
Z/29759/015/01	Variation to planning permission ref. 29759/15	Refused May 1999
Z/29759/015/00 -	Alterations and extension to barn to form golf clubhouse	Approved June 1999

Application reference	Description of development	Decision
F/07/60276	Replace existing fence with new brick wall (1.5M high rising to 2.5M high) with an electric gate.	Refused August 2007
F/07/61007	Construction of iron railing gates with brick piers (2.0m).	Approved October 2007
F/23/96639	Construction of a new plant / equipment store and workshop and erection of segregated aggregate bays.	Approved February 2024
DC/24/98594	Discharge of conditions 3 (contamination), 4 (drainage) & 5 (landscaping) of planning permission F/23/96639 for the construction of a new plant/ equipment store and workshop, and erection of segregated aggregate bays.	Discharged February 2025

Table 1.3: Relevant Planning History for the site (WCC)

Application reference	Description of development	Decision
92/01113/OLD	Development of land as golf course including fairways and tees	Approved April 1992
94/01235/OLD	Extend golf course, alterations to existing	Approved May 1994
98/00970/FUL	Proposed winter water storage pond for irrigation purposes	Approved August 1998
06/03210/FUL	Form extension to existing golf course	Refused January 2006
07/00895/FUL	Extension to existing golf course	Approved August 2008

Development Proposals



Overall Concept

3.1 This is a hybrid application for the following on Land at East Horton Golf Club, Mortimers Lane, Fair Oak, Eastleigh SO50 7EA:

Phase 1 (Greenwood Course)

Full planning permission for the following works:

- Closure and re-planting of 1st Fairway
- New 1st Tee Box and new 1st Fairway along existing Driving Range
- Improved 18th Green
- Closure of existing Driving Range; reprofiling to create a swale and landform; replanting – all to create a new Garden, walkway and wildlife areas along with an attractive edge to the new 1st Fairway
- Accessibility improvements
- Creation of swales and drainage to reduce waterlogging and improve drainage



Phase 1 (Greenwood Course)



Phase 2 (Parkland Course)

Phase 2 (Parkland Course)

Full planning permission for the following works:

- Closure of holes 14, 15 and 18
- Reprofilling and landscaping to create a new 300 yard driving range
- Creation of swales and drainage to reduce waterlogging and improve drainage

Outline planning permission for the following works with all matters reserved except for access:

- Construction of a new Driving Range building

3.2 Based on the above, the description of development for which planning permission is sought is as follows:

'Hybrid application seeking permission for Phase 1, Greenwood Course: Closure of existing driving range and reprofiling of land to create landform and swale with associated landscaping and drainage infrastructure to provide woodland planting and garden space; new 1st tee box and 1st fairway and improvements to 1st green, enlargement of 18th green, landscaping drainage



Landscape Plan

infrastructure; and other associated works (full). Phase 2, Parkland Course: Closure of 14th, 15th and 18th holes and construction of new driving range building (outline with all matters reserved except for access); reprofiling of land to form new driving range target greens and swale with associated landscaping, drainage infrastructure and other associated works (full)'.

3.3 These have been designed with input from James Edwards, a specialist golf architect with James' credentials provided at Appendix 1.

Proposed Use and Layout including Drainage and Landscaping

3.4 The use of the site as a golf course is long established and EHGC is a longstanding and well used facility in this location.

3.5 75,000 to 85,000 tee times have been booked in the past 12 months by members and visitors and in 2024, 800 members were registered. The facilities on site also provide an attractive and popular setting for weddings and other events with 10,000 guests accommodated in the past 12 months and an average of 120 events per year.

3.6 Since the end of 2020, EHGC has seen unprecedented demand for both golf and events including weddings and conferences.



3.7 The golf courses suffer from extensive waterlogging and ponding, particularly on the areas which are subject of this planning application. This results in frequent partial and complete closures, bans on the use of golf buggies and trolleys and a wet and muddy experience overall for much of the year. Closures and restrictions are frustrating and disappointing for members who are looking to play a full 18 hole round and EHGC is known as a 'wet' course.



Greenwood Course – 1st Hole

3.8 The 1st Hole of the Greenwood Course is a key source of complaint from members. The narrow fairway sits between Durley Copse SINC / Ancient Woodland and the watercourse. As such, it is permanently waterlogged and muddy. It rarely receives direct sunlight even during summer months and the surface is always poor with grass struggling to establish and frequent large muddy patches and puddles present at all times of the year. It is one of the most frequently closed holes of the Greenwood Course due to flooding and muddy surfacing, meaning that members often have to start from the 2nd Hole which is a long walk from the Clubhouse and Greenside Barn. When open, the 1st hole is still severely limited in the quality of gameplay. The Tee Box position means that golfers have to cross the 18th Green when starting, causing interruptions to gameplay. The initial drive is at an angle to the fairway, meaning that if the drive is not shortened, the ball enters the SINC / Ancient Woodland and is frequently lost. After a successful first drive, the fairway is narrow, shaded and muddy. Overall, therefore, the 1st hole is a compromise and constraints in the area mean that very little can be done to improve its quality in situ.

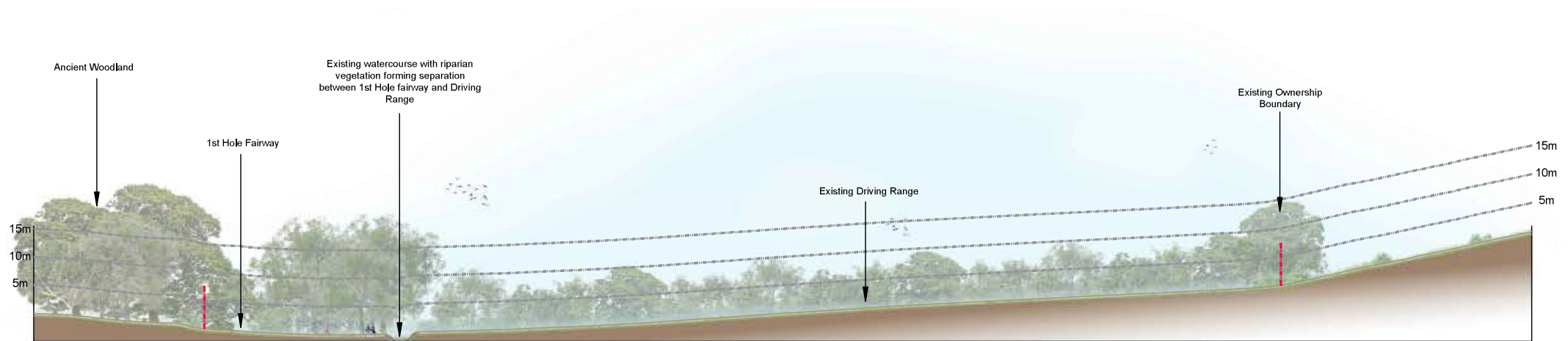
3.9 It is therefore proposed to relocate the 1st Tee Box and Fairway. The new fairway would be created on the other side of the watercourse, along part of the existing driving range. The new Tee Boxes would be positioned closer to the Greenside Barn and North of the 18th Green so that there is no interference between the two. This allows a full 300 yard drive with front Tee Boxes provided to allow

shorter drive distances as well. The new fairway has a natural camber toward the watercourse, meaning that players can aim 'high' and towards the new garden and landform to be created on the existing golf course. Follow up shots from the new fairway will cross the watercourse to the existing 1st Green with players crossing the watercourse via an existing footbridge.

3.10 This will allow offer significant improvement to the 1st hole. The new 1st hole will have much

greater weather resilience and should suffer far less from waterlogging. The shots will be much more open and linear. The new Tee Boxes will be directly in front of the Greenside Bar, meaning players start and finish next to the Bar / Café, and that the 1st Tee and 18th Green are overlooked, creating an attractive setting for players and spectators. The existing 1st fairway can be given over to planting which will soften and enhance the existing SINC / Ancient Woodland edge. It will also prevent balls being lost within this and





Ancient Woodland



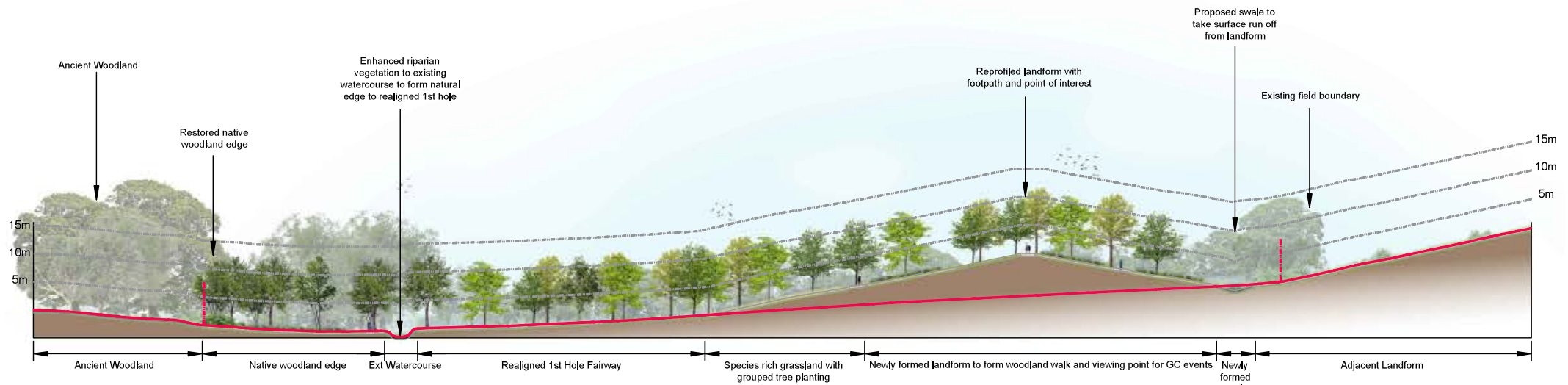
1st Hole Fairway



Existing watercourse



Existing Driving Range looking towards ancient woodland with northern boundary vegetation shown to the right



Ancient Woodland



Newly formed swale



Woodland understorey planting



Point of Interest



View of Golf Course

reduce the need for players to enter this area to search for them. Finally, the alterations support the enhancement of the 18th Green.

Greenwood Course – 18th Hole

3.11 The 18th hole is the last on the Greenwood Course, dropping down from the ridge adjacent the woodland and finishing on the 18th Green directly in front of the Greenside Bar. The 18th is generally a good hole but with some limitations around the green. The proximity to the Bar and crossover with the 1st Tee means that gameplay is frequently interrupted by pedestrians.

3.12 The proposed arrangement moves the 1st Tee beyond the 18th Green, meaning that players do not have to walk across / around the 18th Green when starting out. The 18th Green can be enlarged to further improve the quality of the hole. The proposal also allows the introduction of some landforms and planting which introduce a degree of separation between 1st Tee and 18th Green, and which serve as a backstop for stray balls.

3.13 The first and last holes are arguably the most crucial to the overall experience, allowing players to start and finish with a good quality game and course. Collectively, the proposal will result in substantial improvements to these holes which enhance seasonal resilience and the experience of gameplay on offer. At the same time they avoid all key constraints and offer the opportunity for extensive landscape planting and wildlife enhancements which will also contribute to the course setting.

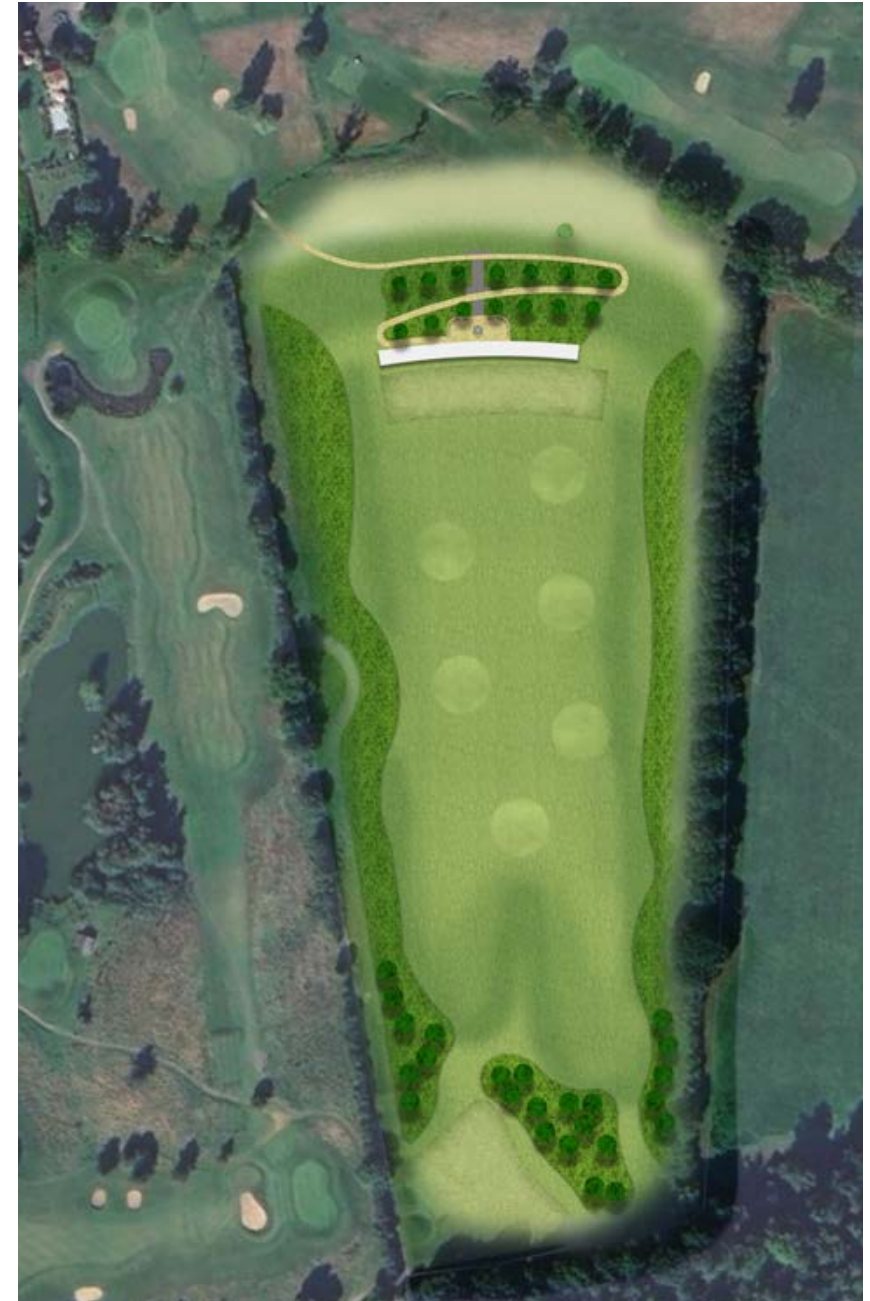
Driving Range

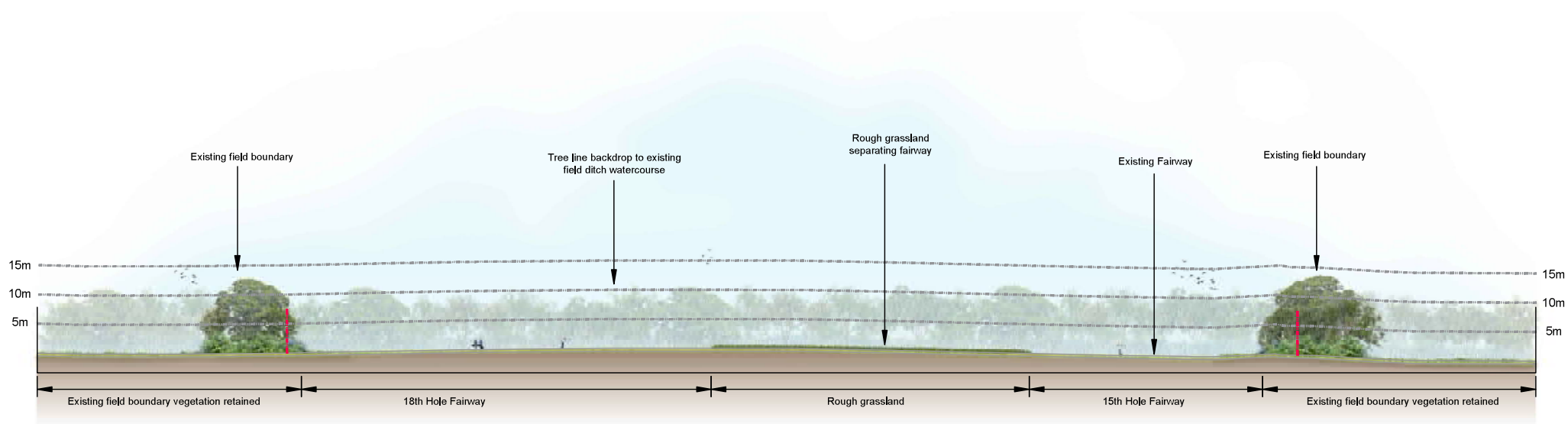
3.14 Most Golf Courses achieve a large proportion of their revenue through their Driving Ranges. These tend to be all-weather facilities and offer a lot of resilience during winter months when members will visit solely to use the driving range. Other business locally, such as at Hedge End, are very successful whilst only offering a Driving Range and no courses.

3.15 At East Horton, the Driving Range is extremely under-utilised, even in peak Summer months. This is for several reasons:

- Poor quality range
- Poor quality landscape setting
- Cross-camber and waterlogging
- Small driving range shelter/ building
- Frequently not possible to collect balls due to waterlogging and muddiness
- Not possible to install target greens

3.16 The Club sells on average 250 Driving Range tokens per week. 1 token equals 35 balls, and individuals may use one or two tokens so there is not a direct correlation between tokens issued and footfall. General and visitor footfall to the Driving Range is highest on weekends, with a lot of the tokens issued being Members warming up before a round. This equates to an average of less than 35 visitors to the Driving Range per day, although in practice the usage fluctuates weekdays / weekends





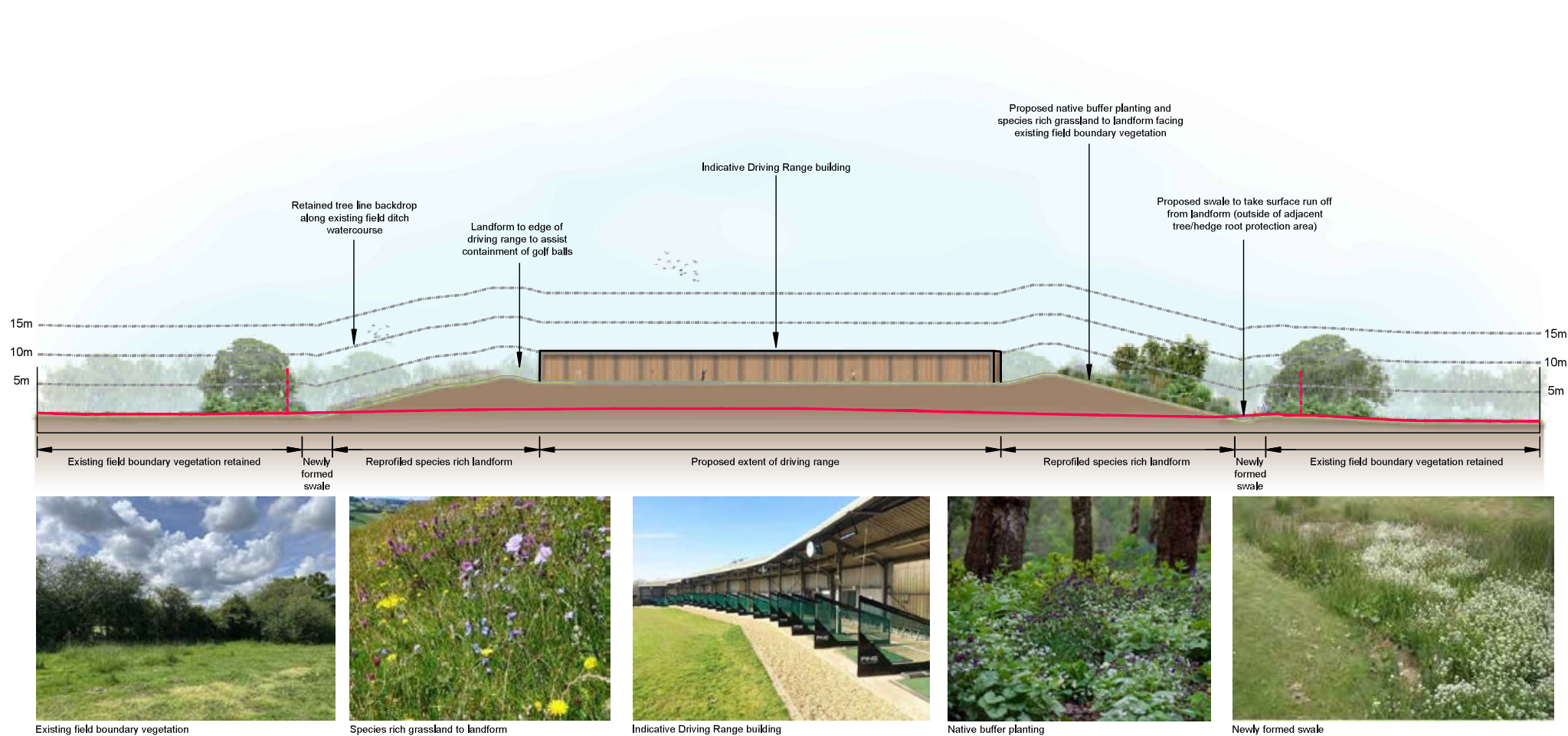
Parkland Course 18th Hole Fairway



Existing Rough Grassland



Existing field boundary vegetation



Phase 2 - Proposed Landscape section elevation

and seasons. Overall, this usage is very low for a facility of this nature and much lower than would be expected.

3.17 As above, part of the existing driving range will be given over to a new fairway. The remainder is proposed for new landforms, formal and informal gardens. Use as a venue for conferences, weddings and other events is a key offering at East Horton Golf Course. The venue is extremely popular for weddings given its attractive parkland setting. At the same time, the availability of garden space is a significant limitation with events unable to stray over onto the Golf Course which is generally in use. The proposal will therefore create a series of open spaces suiting a variety of purposes and users. Closest to the Clubhouse and venue buildings will be an attractive, flat, formal garden which is accessible to all. Moving away from the Clubhouse, this will gradually change to increasingly informal garden area with a circular walkway terminating at a local high spot. This will provide an opportunity for seating and to watch players on the new 1st green from a safe distance. Further still, the remaining area will be given over to landscape planting and wildlife enhancements.

3.18 Collectively, the proposed landform serves a number of important functions:

- It facilitates the creation of a new swale along the boundary with the existing landfill site. This will contain surface water runoff from both directions, controlling flows to the existing watercourse and providing a naturalised

opportunity to filtration, sediment and water management.

- It screens the edge of the new 1st fairway, 'capturing' stray balls and also serving an important landscape and visual function by enclosing the area.
- It screens unsightly views of the landfill area and boundary with the same.
- It allows the creation of a level garden area which is accessible to and overlooked by the three venues on offer.

3.19 The proposal is to create a new driving range to replace the existing. The location has been selected for a number of reasons:

- Sufficient scale to accommodate a full driving range.
- Very limited impacts arising from the proposal – few constraints.
- The area is oversized for the holes it currently contains. These holes are compromised by the slopes and waterlogging.
- Proximity to the access road for those wishing to use the driving range only.

3.20 The new driving range is set outside of the existing flood zone. The driving range building area would be lifted so that the whole driving range is along a gradual upward gradient. The range itself would be within a shallow depression so that raised edges and associated planting screen the range

from other views, as well as helping to trap stray balls. The landform edges give the opportunity to create new swales, again controlling surface water runoff as well as sediment management. The range will reuse the existing footpaths and river crossings and an accessible pathway is proposed.

Scale and External Appearance

3.21 The only building proposed is the new driving range in outline with all matters reserved except for access which will continue to be via the existing arrangement.

3.22 Parameters will be established in outline under this application for appearance, landscaping, layout and scale including the position, maximum footprint and height of the range. Individual bays are 3.5m deep including an accessway.

3.23 The driving range as proposed seeks a maximum footprint of 595 sq. m and a maximum height of 4.5m.

3.24 Matters relating to appearance will be determined at the reserved matters stage in due course.

Access, Servicing and Parking

3.25 Access and parking will be as existing. The proposals relate to part of the existing EHGC and seek to improve the golf and event facilities, including by the construction of a new driving range to ensure that these are adequate to cater for existing and increasing demand.

3.26 The existing access from Mortimer Road will remain unchanged and is included within the red line.

3.27 The existing car park adjacent to the clubhouse will also remain unchanged and is included within the red line.

3.28 Servicing arrangements will remain as existing.

Trees

3.29 The following trees are proposed for translocation in order to facilitate the proposals:

- 2 trees within group G1 to enable the landscaping changes proposed in Phase 1.
- The removal of T8, T9, T10, T11, T12, T13, T14, T15, T16, T17, T18, T19, T20 and T21 and groups G3 and G4 to enable the driving range and landscaping changes proposed in Phase 2.



Statement of Engagement

4

4.1 In accordance with national and local policy and guidance, stakeholder engagement has been undertaken. Principal activities included:

- Discussions with EHGC members.
- Emails to Fair Oak and East Horton Parish Council to advise of the proposals.
- Emails to the EBC Members.
- Emails to EBC Planning Policy

4.2 A summary of points raised by EHGC members is providing in the following table. Overall, out of 8 responses, 1 was supportive, 4 asked for further information and 2 were supportive whilst also asking for further information.

Issue Raised	Applicant Response
Query over what happens to the Parkland Course if the driving range is moved onto land associated with the 14th, 15th and 18th holes, whether these will be replaced and whether the Parkland Course will remain as an 18 hole course.	The Greenwood Course will remain as an 18 hole golf course and the next phase of development will be to reinstate holes 14, 15 and 18.
Query over whether there will be works to drainage to improve the fairways, tracks between the greens and tees, winter tees and bunkers.	The proposals include measures to improve drainage on these areas in response to current problems with waterlogging and the implications this has for partial and full closure of holes and restrictions on a regular basis.
Query over whether the proposals are to make way for housing.	The proposals seek to improve the golf and event offer at EHGC and do not relate to any new housing.
Positive comments: • Good to see investment in the event offer at EHGC. • The changes will improve the environment on the 1st and 18th holes. • The proposals will be met with much excitement and form a much needed addition.	

4.3 In summary, the applicant has actively engaged with the local community and stakeholders to communicate and develop the proposals.

4.4 This has met the requirements of the NPPF and the local guidelines, as set out in the Council's SCI. The pre-application engagement has ensured that the local community and key political stakeholders are well-informed of the proposals. Communication with interested parties remains on-going. As such, the applicant considers that the pre-application engagement undertaken with the local community and key stakeholders has been timely, meaningful, and effective.

Planning Policy Context



5

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning application be made with regard to the Development Plan, unless material considerations indicate otherwise.

5.2 This is reiterated at paragraph 48 of the National Planning Policy Framework (NPPF), which also makes it clear that the NPPF is a material consideration in decision making.

5.3 The main planning policy considerations pertinent to the proposed development are considered below.

The Development Plan

5.4 The site is situated within the administrative area of both Eastleigh Borough Council (EBC) and Winchester City Council (WCC). Whilst the application will be determined by EBC as the largest area of the site is within the jurisdiction of EBC, relevant policies for both Councils are considered below.

Eastleigh Borough Council (EBC)

Adopted Local Plan

5.5 The Development Plan for Eastleigh is comprised of the following:

- Adopted Eastleigh Borough Local Plan 2016-2036
- According to the adopted policies map, the site is:
- Partially within the jurisdiction of EBC.
- Within the countryside.
- Within a minerals and waste consultation area.

5.6 The main planning policy considerations pertinent to the proposed development are considered below.

- **Strategic Policy S1: Delivering sustainable development** – this policy requires new development within the borough to:
 - Meet community needs without comprising existing settlements.
 - Enhance a range of community facilities.

- Help maintain and grow a high performing local economy.
- Have regard to climate change impacts.
- Maintain local environmental quality including avoiding damage to and where possible enhancing the valued urban and rural environments and heritage assets.
- Have regard to the purposes of the South Downs National Park.
- Maintain, enhance, extend and connect the natural habitats and landscape value of the borough, achieving a net gain.

- **Strategic Policy S2: Approach to new development** – this policy supports the development of sports facilities within the borough from 2016 - 2036.
- **Strategic Policy S4: Employment provision** – this policy supports employment in the borough including via the reuse and / or redevelopment of buildings in the countryside and the intensification of existing sites which have the potential to contribute to future employment needs.

- **Strategic Policy S5: New development in the countryside** – this policy sets out that planning permission will be granted for new development in the countryside where it relates to uses including those for outdoor recreation. Development permitted in the countryside will be required to:
 - Avoid adverse impacts on rural, woodland and the intrinsic character of the landscape including the avoidance of adverse landscape impacts on areas adjoining national parks and their settings, the significance of heritage assets and the biodiversity of the area.
 - Secure long term management practices to enhance the landscape and biodiversity of the countryside.
 - Avoid sterilisation of mineral resources.
 - Protect soils where possible during construction.
- **Strategic Policy S8: Historic Environment** – this policy seeks to conserve or enhance heritage assets in a manner appropriate to their significance. It seeks to restrict development that is likely to harm heritage assets or their settings but encourages development that enhances them, enables public enjoyment and interpretation.
- **Strategic Policy S9: Green Infrastructure** – this policy seeks to secure the provision, retention and / or enhancement or multifunctional green infrastructure including provision of:
 - Landscape scale strategic links across the borough boundary.
 - Interlinked publicly accessible open space through new and existing development including formal sports facilities.
 - Green infrastructure in all new development with spaces connected by primary, secondary and tertiary green links.
 - Connected habitats linking networks of designated sites and existing priority habitats.
 - Incorporation of historic buildings and landscapes within the wider green infrastructure.
- **Strategic Policy S11: Transport infrastructure** – this policy seeks to ensure that development encourages walking, cycling and the use of public transport, minimises congestion and supports safety on the highway network as demonstrated in a transport assessment.
- **Strategic Policy S12: Strategic footpath, cycleway and bridleway links** – this policy seeks to ensure that new development integrates with existing routes and public rights of way.
- **Policy DM1: General criteria for new development** – this policy requires all new development to take account of certain criteria. This includes ensuring any impact is acceptable and enhances the character of the area, biodiversity and heritage assts. In addition, development is required to make efficient use of a site and take full account of the context of the site. It should also not involve and loss or damage to trees, woodlands etc.
- **Policy DM2: Environmentally sustainable development** – this policy seeks to ensure that buildings of more than 500 sq. m incorporate energy efficient passive design principles; make best use of natural daylight and natural ventilation systems wherever possible. Existing low carbon local energy networks should be connected to unless unviable. Recycled, low embodied carbon, low environmental impact and locally sourced materials should be used in construction where possible and proposals should be designed with flexibility in mind.
- **Policy DM3: Adaption to climate change** – this policy requires all development to be designed to be adapt to predicted climate change impacts for the borough including reducing the risk of surface water flooding via the use of sustainable drainage systems, green open space and green roofs where appropriate.
- **Policy DM5: Managing flood risk** – this policy supports development within areas at risk of flooding providing that:
 - It meets the sequential and exception test where required.
 - A site specific flood risk assessment demonstrates that the development, including the access will be safe without increasing flooding elsewhere.

- The scheme incorporates flood protection, resilience and resistance measures appropriate for the character and biodiversity of the area, taking opportunities to use natural flood management techniques.
 - Appropriate flood warning and evacuation measures are in place.
 - New site drainage is designed taking account of events that exceed the normal design standard.
- **Policy DM6: Sustainable surface water management and watercourse management**
 - this policy supports development where it incorporates sustainable drainage systems. It notes that where feasible, naturalised filtration should be included and that on sites of more than 1ha, this should include at least 3 forms of this. Schemes should:
 - Accord with technical requirements.
 - Manage runoff as close to its source as possible.
 - Ensure that discharge rates are reduced as far as possible.
 - Follow natural hydrological pathways where discharge is to a wetland or wet woodland habitat.
 - Include arrangements for management and maintenance.

Where a watercourse is present on site, it should be retained or restored into a natural state and

enhanced where possible and if a watercourse drains to a Natural 2000 or Ramsar network, a CEMP is required prior to determination.

- **Policy DM8: Pollution** – this policy advises that development will not be permitted if it is likely to cause loss of amenity or impact on public health. It requires contamination to be investigated.
- **Policy DM11: Nature conservation** – this policy seeks to protect, conserve and enhance all international, national and local nature conservation designations and to ensure a net gain of biodiversity on all development. Development will not be permitted where it has a direct or indirect adverse impact on a SSSI, SINCR, LNR, priority habitats, protected and priority species and the local ecological network unless it can be demonstrated that:
 - There are no alternative solutions.
 - The adverse effects are unavoidable.
 - Mitigation or as a last resort, compensation measures are provided.
 - Any residual adverse effects are outweighed by the benefits of development.

The loss or deterioration of irreplaceable habitats such as ancient woodland will not be permitted unless there are wholly exceptional circumstances for this. Appropriate buffers will be required and surveys will need to be undertaken for relevant species.

- **Policy DM12: Heritage Assets** – this policy seeks to avoid any harm or detract from the

significance of the setting of a heritage asset and to ensure it enhances its special character and qualities. Development within the setting of a heritage asset will be permitted provided it does not harm or detract from the significance or special interest of the asset, and sustains and enhances its special character and qualities. Permission resulting in substantial harm to, or loss of designated heritage assets will not be permitted unless it would enhance or better reveal the significance of the asset. Proposals should achieve a high quality of design to respect and complement the character and qualities of the heritage asset, where possible enabling public enjoyment and interpretation. A heritage statement is required to explain the significance of the assets affected, including their setting at a level of detail proportionate to their significance. The impact of the proposal should be identified and measures to avoid harm should be set out, including mitigation measures if required.

Development that affects an archaeological site that is already identified or discovered through development proposals will only be permitted where:

- If the remains cannot be preserved in situ, clear and convincing overriding public benefits of the development that cannot be achieved by other means is sufficient to outweigh the value of the remains.
- Prior to commencement, provision has been made for a programme of archaeological works including investigation and recording.

- **Policy DM13: General development criteria (transport)** – this policy requires all new development to have safe and convenient access to the highway network.
- **Policy DM14: Parking** - this policy sets out criteria for the provision and management of car parking.
- **Policy DM18 (Extension and replacement of non-residential buildings in the countryside)** – this policy supports the extension and replacement of non-residential buildings subject to:
 - An existing lawful use.
 - No urbanising effect.
 - Access, parking, landscaping and services can be provided without a detrimental effect.
 - Sustainable location.
 - The proposals being within the existing curtilage unless its relocation would contribute to improving the character and quality of the local area.
 - Demolition of the building to be replaced.
- **Policy DM32: Protection of recreation and open space facilities** – this policy seeks to prevent the loss of existing recreation facilities. It supports the provision of development ancillary to a recreational use provided it does not adversely affect land forming part of a playing pitch or court / green.
- **Policy DM34: New and enhanced recreation and open space facilities** – this policy refers to the provision, extension or enhancement of public and private recreation facilities which will be supported providing that:
 - They accord with the general development criteria and biodiversity and heritage policies of the Local Plan;
 - In the countryside new buildings will be limited to those ancillary and essential for the use of the land and development should not involve structures, floodlighting or activities that cause urbanisation or detract from the countryside
 - They contribute to the management and where possible enhance the countryside and;
 - Are readily accessible by means of transport other than a private car.
- **Policy DM36: Community, leisure and cultural facilities** – this policy supports the extension of existing facilities in the countryside subject to compliance with DM18.

Supplementary Planning Documents (SPDs)

5.7 The following EBC Supplementary Planning Documents (SPD) and guidance have also been considered in developing the submitted proposals:

- **Biodiversity SPD (adopted 2009)** – this provides additional guidance for nature conservation policies

- **Environmentally Sustainable Development SPD (adopted March 2009)** – this provides additional guidance on sustainability requirements for non-residential development.
- **Trees and Development (adopted April 2022)** – this sets out the borough's approach to trees in relation to development.

Emerging Local Plan

5.8 EBC have recently consulted on the first stage of their Local Plan Review. Issues and Options consultation was undertaken between the 4th December 2024 and the 29th January 2025. The emerging local plan is still at an early stage.

Winchester City Council (WCC)

Adopted Local Plan

5.9 The Development Plan for Winchester is comprised of the following:

- Local Plan Part 1 – Joint Core Strategy (adopted March 2013)
- Local Plan Part 2 – Development Management and Allocations (adopted April 2017)
- Hampshire Minerals and waste Plan (adopted 2013)

5.10 According to the adopted policies map, the site is:

- Partially within the jurisdiction of WCC.
- Within the countryside.

5.11 The main planning policy considerations pertinent to the proposed development within the Local Plan Part 1 (LPP1) are considered below.

- **Policy DS1: Development Strategy and Principles**

– this policy requires the council to take a positive approach to development proposals that reflect the presumption in favour of sustainable development in accordance with the NPPF. The Local Planning Authority (LPA) will support the delivery of economic growth and diversification. Proposals are expected to demonstrate conformity with principles including:

- Maintaining and enhancing the importance of environmental, heritage and landscape assets and making effective use of scarce natural resources.
- Encouraging public transport, walking and cycling as an alternative to the private car.
- Achieving high standards of design and sensitivity to character, setting and cultural heritage.
- Testing existing infrastructure and service capacity for new development.
- Addressing the impact of climate change.

- **Policy MTRA1: Development Strategy Market Towns and Rural Area**

– this policy seeks to support local businesses and employment opportunities. It requires proposals to maintain and enhance local character and built or natural

features and to retain settlement identity. It requires development to be of an appropriate scale for existing services and infrastructure.

- **Policy MTRA 4: Development in the Countryside**

– this policy states that in the countryside the LPA will only permit certain types of development. This includes:

- Development that has an operational need for a countryside setting.
- The expansion or redevelopment of existing buildings to facilitate the expansion on-site of established building and to meet an operational need providing the development its proportionate to the nature and scale of the site, its setting and the countryside location.
- Development should not cause harm to the character and landscape of the area or neighbouring uses or create inappropriate noise / light and traffic generation.

- **Policy CP6: Local Services and Facilities**

– this policy supports proposals for the development of new, extended or improved facilities and services. The preamble text to the policy includes reference to recreation facilities.

- **Policy CP7: Open Space, Sport and Recreation**

– this policy seeks to secure improvement in built recreation facilities within the district.

- **Policy CP8: Economic Growth and Diversification**

– this policy supports economic growth across the district, including within recreation.

- **Policy CP10: Transport**

– this policy seeks to reduce demands on the transport network, manage existing capacity and secure necessary improvements.

- **Policy CP11: Sustainable Low and Zero Carbon Built Development**

– this policy requires developments to achieve the lowest level of carbon emissions and water consumption that is practical and viable. Non-residential development that requires an Energy Performance Certificate will be required to meet BREEAM Outstanding from 2016. Proposals should: maximise energy efficiency; connect to CHP and district heating / cooling networks; and use renewable energy technologies.

- **Policy CP13: High Quality Design**

– this policy expects new development to meet the highest standards of design including:

- An analysis of the site and surroundings which inform the principles of design.
- A positive contribution to local environment, creating an individual place with distinctive character.
- A well designed, safe and accessible public realm.
- A landscape framework that enhances the natural and built environment.
- Measures to minimise carbon emissions and to improve biodiversity.

- **Policy CP15: Green Infrastructure** – this policy seeks to support proposals which maintain, protect and enhance the green infrastructure network, delivering a net gain.
 - **Policy CP16: Biodiversity** – this policy supports development which maintains, protects and enhances biodiversity and delivers a net gain while minimising the effect on priority habitats or sites of geological importance. If any harm to habitats or species is anticipated, proposals will be permitted where their benefits outweigh this. Relevant surveys are required to assess presence of and impacts on protected species.
 - **Policy CP17: Flooding, Flood Risk and the water Environment** – this policy supports development that:
 - Applies a sequential test to the location and site level and the exception test if necessary.
 - Manages flood risk from new development to ensure risk is not increased elsewhere.
 - Safeguards land, designated structures and features from development where required for current and future flood management.
 - Includes sustainable water management systems.
 - Does not cause deterioration of the water environment.
 - Ensures there is capacity for surface water drainage and wastewater infrastructure.
 - **Policy CP19: South Downs National Park** – this policy requires development to remain in keeping with the context and setting of the South Downs National Park.
 - **Policy CP20: Heritage and Landscape Character** – this policy seeks to conserve and enhance the historic environment, supporting development which recognises, protects and enhances the distinctive landscape and heritage assets of the district and their settings. This relates to designated heritage assets and archaeological assets. Particular emphasis should be given to conserving the following:
 - Recognised built form and designed or natural landscapes that include features and elements of natural beauty, cultural or historic importance;
 - Local distinctiveness, especially in terms of characteristic materials, trees, built form and layout, tranquillity, sense of place and setting.
 - **Policy DM13: Leisure and Recreation in the Countryside** – this policy states that outside defined settlement boundaries, the development of new leisure and recreational facilities for which a countryside location is necessary, the expansion of established facilities, and the use of land for leisure and recreational activities will be permitted, where it accords with the Development Plan and:
 - The development does not create unacceptable visual or noise intrusion in the countryside, either by itself or when viewed cumulatively with other developments;
 - Additional buildings, structures and ancillary developments are the minimum required for the operation of the site;
 - The operation of the site will not cause an unacceptable alteration in the character of the area, including by all forms of pollution, or harm biodiversity, heritage assets, tranquillity or public safety;
 - Appropriate landscaping schemes and screening are provided.
- It also notes that artificial lighting will only be permitted where visually acceptable and strictly necessary. Its design and operation may be limited by condition in order to minimise light pollution in the countryside. The preamble text to this policy refers to development that requires a countryside location including golf.

5.12 The main planning policy considerations pertinent to the proposed development within the Local Plan Part 2 (LPP2) are considered below.

- **Policy DM1: Location of New Development** – this policy advises that outside of the defined boundaries of settlements, countryside policies will apply.

- **Policy DM15: Local Distinctiveness** – this policy requires developments to respect the qualities, features and characteristics that contribute to the distinctiveness of the local area. Proposal will be permitted where they conserve or enhance:
 - the landscape and townscape framework, including the 'key characteristics' identified in local Character Assessments and adopted Design Statements;
 - open areas and green spaces that contribute to the special qualities of the townscape or the setting of buildings, including heritage assets;
 - recognised public views, features or skylines;
 - the special qualities of Conservation Areas and historic landscapes;
 - trees, hedgerows, water features and corridors which contribute to local distinctiveness.
- **Policy DM16: Site Design Criteria** – this policy notes that development will be permitted provided it:
 - Responds positively to local character.
 - Maintains permeability and access throughout the site.
 - Designs any service areas to be integral and not dominant.
 - Provides boundaries that respond positively to the local context.
- Has an appropriate ratio of hard to soft landscaping.
- Uses high quality materials.
- Utilises the principles of energy efficient design.
- **Policy DM17: Site Development Principles** – this policy supports development that:
 - Provides a safe and secure environment.
 - Doesn't have an unacceptable impact on ecosystems, townscape, landscape or heritage.
 - Includes provision for surface water drainage and sewage disposal.
 - Makes adequate provision for refuse and recycling.
 - Facilitates and does not constrain future development.
 - Provides amenity and recreation space for users.
 - Doesn't have an unacceptable impact on adjoining land.
 - Doesn't cause unacceptable levels of pollution.
 - Provides lighting that is not visually intrusive.
- **Policy DM18: Access and Parking** – this policy requires provision for access and parking to be made considering highways safety.
- **Policy DM19: Development and Pollution** – this policy seeks to ensure that development does not result in unacceptable impacts on quality of life.
- **Policy DM21: Contaminated Land** – this policy seeks to ensure that contamination is addressed where required.
- **Policy DM23: Rural Character** – this policy states that outside of defined settlement boundaries, development proposals will be permitted where they do not have an unacceptable effect on the rural character of the area, by means of visual intrusion, the introduction of incongruous features, the destruction of locally character tic rural assts or by impacts on the tranquillity of the environment. The following factors will be considered:
 - Physical – developments will be encouraged to protect and enhance the key characteristics of the landscape and should avoid the loss of key features or the introduction of elements that detract from the special qualities of the place. Any re-modelling of the landscape will also be taken into account.
 - Tranquillity – developments should not have an unacceptable effect on the rural tranquillity of the area, including the introduction of lighting or noise occurring as a result of the development, taking account of the relative remoteness and tranquillity of the location. New lighting will generally not be permitted in unlit areas and the type, size, design and operation of any lighting may be controlled where necessary by the use of conditions.

- Developments should not detract from the enjoyment of the countryside from the public realm or public rights of way.
- The volume and type of traffic generated by the development will be assessed along with the ability of rural roads to accept increased levels of traffic without alterations that would harm their rural character.

- **Policy DM24: Special Trees, Important Hedgerows and Ancient Woodlands** – this policy seeks to ensure that development does not result in the loss of ancient woodland, important hedgerows, special trees, distinctive ground flora and the space required to support them in the long term.
- **Policy DM26: Archaeology** – this policy advises that where there is evidence of heritage assets or where these are suspected to exist, sufficient information should be provided to define their significance as far as reasonably practicable. This includes a desk based assessment and an assessment of the effect of any proposals. Permission will be granted where:
 - Provision to preserve the archaeological remains in situ, by sensitive layout and design (particularly foundations, drainage/ services and landscaping); and
 - Provision for the investigation and recording of any archaeological remains that cannot or are not required to be preserved including the publication of results, in accordance with a detailed Written Scheme of Investigation approved before the start of development.

- **Policy DM29: Heritage Assets** – this policy advises that works that would cause an unacceptable level of harm to the special interest of heritage assets or their settings will only be permissible in exceptional circumstances.

Supplementary Planning Documents (SPDs)

5.13 The following WCC Supplementary Planning Documents (SPD) and guidance have also been considered in developing the submitted proposals:

- **High Quality Places SPD (adopted 2015)** – this provides additional guidance on design criteria for assessing planning applications.
- **Landscape Character Assessment SPD (adopted 2022)** – this provides further advice on landscape character within the district.

Emerging Winchester Local Plan

5.14 The Council has submitted a draft Local Plan to the Secretary of State for Housing, communities and Local Government for examination.

5.15 The emerging local plan has been submitted for examination but is still in draft format and not yet adopted so only limited weight can be applied to it. It does however set out the Council's intention for future development in the district covering the period 2020 -2040.

5.16 According to the emerging policies map, the site is:

- Partially within the jurisdiction of WCC.
- Within the countryside.
- Within the SPA summer only boundary region for Solent and Southampton Water.
- Within the SPA boundary region for Portsmouth Harbour.

5.17 The most relevant policies of the Winchester Local Plan – Proposed Submission (Regulation 19) are specified below for reference purposes

- **Strategic Policy SP2: Spatial Strategy and Development Principles** – this policy requires proposals to:
 - Conserve and enhance the importance of environmental assets and make efficient use of scarce natural resources including the recycling of materials on site.
 - Address the impact of climate change.
 - Make use of public transport, walking and cycling.
 - Achieve high standards of design and sensitivity to character, setting and cultural heritage.
 - Contribute to community wellbeing.

- **Strategic Policy SP3: Development in the Countryside** – this policy states that in the countryside the LPA will only permit certain types of development. This includes:
 - Development that has an operational need for a countryside setting including outdoor recreation.
 - The expansion or redevelopment of existing buildings to facilitate the expansion on-site of established building and to meet an operational need providing the development is proportionate to the nature and scale of the site, its setting and the countryside location.

Development should not cause unacceptable harm to biodiversity and the water environment, the landscape character of the area or neighbouring uses or unacceptable noise / light or traffic generation.

- **Strategic Policy CN1: Mitigating and Adapting to Climate Change** – this policy seeks to meet the targets of the Council's Climate Emergency Declaration. Proposals are required to consider low carbon solutions, nature based solutions, sustainable travel, water use management, open space, biodiversity, overheating and landscaping.
- **Policy CN2: Energy Hierarchy** – this policy requires the following hierarchy to be followed:
 - A fabric first approach to minimise energy demand.
 - Maximising energy efficiency.
 - Utilising renewable energy.
 - Utilising low carbon energy.
- **Policy CN3: Energy Efficiency Standards to Reduce Carbon Emissions** – this policy requires all new development to demonstrate the lowest possible level of carbon emissions. Non residential development should meet BREEAM Excellent or agreed industry equivalent, maximising on-site renewable energy generation.
- **Policy CN4: Water Efficiency Standards in New Developments** – this policy requires a high standard of water efficiency. Non-domestic development is required to meet BREEAM water efficiency credits and incorporate water use management and conservation measures.
- **Policy CN8: Embodied Carbon** – this policy requires proposals to calculate embodied carbon.
- **Strategic Policy D1: High Quality, Well Designed and Inclusive Places** – this policy requires development to make a positive contribution to the area using high quality materials and giving rise to an acceptable impact on adjoining land. Proposals should demonstrate:
 - A positive contribution towards the local environment.
 - A high quality public realm.
 - Good connections to green / blue infrastructure and accessible layouts.
 - Reduced crime and antisocial behaviour.
 - Improvements to the landscape framework and biodiversity.

- Measures to minimise carbon emissions.
- Boundary treatments that respond positively to the local context.
- Legibility in building access.
- Outdoor seating as appropriate

- **Strategic Policy D4: Design Principles for Market Towns and Rural Areas** – this policy requires development within the MTRA to demonstrate how they address strategic policy D1 including design, character, local evidence and community engagement.
- **Policy D7: Development Standards** – this policy requires proposals to meet development standards relating to pollution.
- **Policy D8: Contaminated Land** – this policy seeks to ensure that contamination is addressed where required.
- **Strategic Policy T1: Sustainable and Active Transport and Travel** – this policy requires developments to assess their impact on travel considering:
 - Genuine choice in transport modes.
 - Reduction in trips.
 - Safe and convenient routes.
 - The safe and efficient operation of the road network.
 - Highways safety and congestion.

- **Policy T2: Parking for New Development** – this policy requires development to demonstrate adequate parking is provided.
- **Policy T3: Enabling Sustainable Travel Modes of Transport and the Design and Layout of Parking for New Developments** – this policy seeks to prioritise sustainable travel modes.
- **Policy T4: Access for New Developments** – this policy requires provision for access and parking to be made considering highways safety.
- **Strategic Policy NE1: Protecting and Enhancing Biodiversity and the Natural Environment in the District** – this policy seeks to support development where it demonstrates it will protect and enhance the natural environment and biodiversity including the natural beauty of the landscape, all natural resources, habitats and species. This includes:
 - Avoiding significant harm and mitigation where necessary including for key species, internationally protected sites, nationally protected designated sites, or locally designated sites.
 - Safeguarding features of the natural environment and nature conservation interest and helping to tackle the climate emergency including measures to retain, conserve and enhance habitats, including, internationally, nationally and locally designated sites, priority habitats, networks of ecological interest, ancient woodland, water features, hedgerows and wetland pastures as corridors and stepping- stones for wildlife.
 - No harm to the ecological network.
 - Development which would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees, will only be permitted in exceptional circumstances where the public benefit would clearly outweigh the loss or deterioration and where a suitable compensation strategy exists.
 - Mitigation and compensation on-site or off-site or via a financial contribution in limited circumstances.
 - Protection of ecology, the air and water environments.
- **Policy NE3: Open Space, Sport and Recreation** – this policy seeks improvements to the open space and built recreation facilities.
- **Policy NE4: Green and Blue Infrastructure** – this policy seeks to support proposals that maintain, protect and enhance the existing green infrastructure network, including providing measurable net gains.
- **Policy NE5: Biodiversity** – this policy seeks to:
 - Secure a minimum 10% biodiversity net gain from proposals.
 - Protect sites of international and national importance and local nature conservation sites from inappropriate development.
 - Avoid adverse impacts or if unavoidable, secure mitigation for SPA / Ramsar sites.
- **Policy NE6: Flooding, Flood Risk and the Water Environment** – this policy supports development that:
 - Mitigate recreational disturbance on the Solent and New Forest.
 - Support proposals where the benefits outweigh any harm to habitat or species.
 - Maintain a district wide network of local wildlife sites.
 - Applies a sequential test to the location and site level and the exception test if necessary.
 - Manages flood risk from new development to ensure risk is not increased elsewhere.
 - Safeguards land, designated structures and features from development where required for current and future flood management.
 - Includes sustainable water management systems.
 - Prioritises opportunities for natural flood management.
 - Ensures there is capacity for surface water drainage and wastewater infrastructure.
 - Includes above ground features including green roofs/walls, rain gardens, bio-retention areas and swales, and features that provide multi-functional uses to maximise benefit to flood risk management, water quality, biodiversity, and amenity to provide attenuation and biodiversity enhancement.
 - Includes drainage systems that have been designed for the lifetime of development.

- **Policy NE8: South Downs National Park** – this policy requires development to remain in keeping with the context and setting of the South Downs National Park.
- **Policy NE9: Landscape Character** – this policy seeks to support development where it protects and enhances the districts distinctive landscape character by evidencing:
 - They are informed by the existing landscape character and response positively to the landscape type.
 - Consideration of local distinctiveness.
 - New planting is consistent with local character.
 - Proposals within designated landscapes or their setting are based on an understanding of the design principles of that landscape.
 - The setting pattern and individual identity of settlements and the integrity of predominantly open and undeveloped land between settlements will not be undermined.
 - Green and blue corridors will be safeguarded.

The policy requires an LVIA to assess the impact of development on character.

- **Policy NE13: Leisure and Recreation in the Countryside** – this policy states that outside defined settlement boundaries, the development of new leisure and recreational facilities for which a countryside location is necessary, the expansion of established facilities, and the use of land for leisure and recreational activities will be permitted, where it accords with the development plan and:

- The development does not create unacceptable visual or noise intrusion in the countryside, either by itself or when viewed cumulatively with other developments;
- Additional buildings, structures and ancillary developments are the minimum required for the operation of the site;
- The operation of the site will not cause unacceptable harm to the character of the area, including by all forms of pollution, or harm biodiversity, heritage assets, tranquillity or public safety; and
- Appropriate landscaping schemes and screening are provided.

Artificial lighting will only be permitted where visually acceptable and essential to support the operation of the use. Its design and operation may be limited by condition in order to minimise light pollution in the countryside.

- **Policy NE14: Rural Character** – this policy advises that outside defined settlement boundaries, proposals will be accepted where they do not have an unacceptable effect on the rural character of the area by means of visual intrusion, the introduction of incongruous features, the destruction of locally characteristic rural assets or on the tranquillity of the environment. This will include consideration of visual, physical and tranquillity matters. Opportunities to reduce light pollution and traffic impact will need to be taken.

- **Policy NE15: Special Trees, Important Hedgerows and Ancient Woodlands** – this policy notes that the loss of ancient woodland, important hedgerows, special trees, distinctive ground flora and the space required to support them in the long term will only be permitted in exceptional circumstances. The removal of protected trees, groups of trees, woodland or hedgerows will only be permitted in exceptional circumstances with appropriate replacements provided. Proposals affecting these will need to be informed by a full site survey and proposals should provide adequate buffer zones to prevent damage. This should be a minimum of 15m. Protection measures will be required during construction and opportunities for new planting should be taken.
- **Policy NE17: Rivers, Watercourses and their Settings** – this policy advises that proposals affecting rivers, watercourses and their setting will be permitted where they conserve and enhance the following:
 - Water quality and quantity.
 - Ability of groundwater, surface water features and watercourse corridors to function as natural flood management areas throughout seasonal variations.
 - For surface water features and watercourse corridors: increasing biodiversity; character, appearance and setting; public access to and along the waterway for recreation; and measures to eliminate the risk of pollution to groundwater.

- **Strategic Policy HE1: Historic Environment** – this policy requires the historic environment to be conserved, enhanced and enjoyed.
- **Policy HE2: All Heritage Assets** – this policy seeks to preserve heritage assets in a manner that is appropriate to their significance. Applications are required to include appropriate expertise and assessment to describe significance of heritage assets and their settings and the nature of impact associated with a development.
- **Policy HE3: Designated Heritage Assets** – this policy notes that great weight will be given to the conservation of heritage assets regardless of whether the harm is less than substantial, substantial or total loss. Any harm will need to be clearly and convincingly justified. Substantial harm to highly graded designated heritage assets should be wholly exceptional and substantial harm to other designated assets should be exceptional. The most severe level of harm to designated heritage assets should be refused unless it is demonstrated that substantial harm is outweighed by substantial public benefits or unless other specified criteria are met. All other harm classified as less than substantial harm to designated heritage assets should be weighed against the public benefits of the proposal including where appropriate, securing its optimal viable use.
- **Policy HE7: Non Designated Archaeological Assets** – this policy requires development proposals to be supported by proportionate evidence describing the significance of any

archaeological assets affected including any contribution made by their settings. Where a site has the potential to include archaeological assets, early discussions are advised and a desk based assessment will be required. Where development affecting archaeological assets is permitted, developers will be required to record and advance understanding of any assets to be lost in accordance with a written programme of archaeological investigation.

- **Policy HE8: Applications Affecting Listed Buildings** – this policy requires applications affecting listed buildings to demonstrate a proportionate understanding of the building which should inform proposed interventions.
- **Strategic Policy E1: Vibrant Economy** – this policy acknowledges the importance of the rural economy.
- **Strategic Policy E2: Spatial Distribution of Economic Growth** – this policy supports economic development outside of settlement boundaries where it supports diversification of the rural economy.
- **Policy E9: Economic Development in the Rural Area** – this policy advises that development outside of defined settlement boundaries must not have an adverse effect on rural character and be compatible with the need to preserve and maintain the quality of the natural environment. Economic development will be supported where: it has an operational need for a countryside location or is required to meet an operational need for an established business. Consideration

will be given to whether additional buildings could be accommodated within existing buildings or via extensions to these.

National Planning Policy Framework

5.18 The National Planning Policy Framework (“NPPF”) was most recently updated in December 2024 and is a material consideration in planning decisions.

5.19 The purpose of planning is to contribute to the achievement of sustainable development and **Paragraph 8** outlines the three overarching objectives of this:

‘a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy’.

5.20 Paragraph 9 advises that planning policies and decisions should play an active role in guiding development towards sustainable solutions, also taking local circumstances into account to reflect the character, needs and opportunities of each area.

5.21 Paragraph 10 sets a presumption in favour of sustainable development to ensure that sustainable development is pursued in a positive way.

5.22 Paragraph 11 sets out that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking, this means:

'c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.'*

5.23 Chapter 4 (Decision making) advises that local planning authorities should approach decisions on proposed development in a positive and creative way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers should seek to approve applications for sustainable development where possible.

5.24 Chapter 6 (Building a strong, competitive economy) seeks to support economic growth and productivity accounting for local needs and wider opportunities and considering the needs of different sectors.

5.25 Paragraph 88 advises that decisions should enable:

- 'a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship'.*

5.26 Paragraph 99 acknowledges that decisions should recognise that sites to meet local business and community needs in rural areas may be required adjacent to or beyond rural settlements with development required to: be sensitive to its surroundings and to not have an unacceptable impact on local roads.

5.27 Chapter 8 (Promoting healthy and safe communities) seeks to achieve, healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lives.

5.28 Paragraph 98 advises that policies and decisions should plan positively for the provision of sports venues.

5.29 Paragraph 103 acknowledges that access to opportunities for sport and physical activity is important for the health and wellbeing of communities. **Paragraph 104** protects sports facilities.

5.30 Chapter 9 (Promoting sustainable transport) seeks to ensure that transport matters are considered at the earliest stages of development.

5.31 Paragraph 116 advises that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

5.32 Chapter 12 (Achieving well-designed and beautiful places) advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Design quality should be considered throughout the evolution and assessment of individual proposals.

5.33 Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) seeks to secure a transition to a net zero by 2050 taking full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change.

5.34 Paragraph 166 advises that new development should comply with development plan policies on decentralised energy unless it can be demonstrated to be not feasible or viable. Proposals should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

5.35 Paragraph 170 notes that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk. Where development in such areas is necessary, it should be safe for its lifetime and not increase flood risk elsewhere.

5.36 Paragraph 173 notes that a sequential, risk based approach should apply for individual applications and **paragraph 174** notes that this is intended to steer new development to areas with the lowest risk and that development should not

be permitted if there are reasonably available sites appropriate for the proposed development in lower risk areas.

5.37 Paragraph 175 advises that the sequential test should be used in at risk areas from any type of flooding except in situations where a site specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other vulnerable elements would be located on an area at risk of flooding.

5.38 Paragraph 177 confirms that if it is not possible to locate development elsewhere having applied the sequential test, the exception test may have to be applied, depending on the flood risk vulnerability classification. **Paragraph 178** confirms that the exception test should be informed by a site specific flood risk assessment and that to pass this, the following need to be demonstrated:

'a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.'

5.39 Paragraph 181 advises that in determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere with applications supported by site specific flood risk assessments. Development

should only be allowed in areas at risk of flooding where it can be demonstrated that:

'a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.'

5.40 Paragraph 182 confirms that applications affecting drainage should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff in a manner that is proportionate to the nature and scale of the proposal.

5.41 Chapter 15 (Conserving and enhancing the natural environment) seeks to contribute to and enhance the natural and local environment, protect and enhance habitats and biodiversity and consider ground conditions and pollution.

5.42 Paragraph 187 advises that policies and decisions should contribute to and enhance the natural and local environment by:

'a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.

5.43 Paragraph 190 notes that development within the setting of National Parks should be sensitively located and designed to avoid or minimise adverse impacts.

5.44 Paragraph 193 advises that local authorities should apply the following principles when determining planning applications:

'a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their

design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate'.

5.45 Paragraph 194 notes that potential SPA, potential SAC, listed or proposed Ramsar sites and sites identified as compensatory measures for adverse effects on habitats sites, potential SPA, potential SAC or listed or proposed Ramsar sites should be given the same protection as habitats sites.

5.46 Paragraph 198 notes that decisions should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment.

5.47 Chapter 16 (Conserving and enhancing the historic environment) at **paragraph 207** notes that applicants are required to describe the significance of any heritage assets affected including their setting with the level of detail proportionate to the assets' importance.

5.48 Paragraph 210 advises that in determining applications, local planning authorities should take account of:

'a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness’.

5.49 Paragraph 212 advises that when considering the impact of development on the significance of a designated heritage asset, great weight should be given to its conservation irrespective of whether harm amounts to substantial, total loss or less than substantial. **Paragraph 213** advises that any harm to or loss of the significance of a designated heritage asset should require clear and convincing justification with substantial harm to Grade II Listed Buildings wholly exceptional.

5.50 Paragraph 214 notes that where a proposed would lead to substantial harm of a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that this is necessary to achieve substantial public benefits that outweigh the harm or if other specific criteria apply.

5.51 Paragraph 215 advises that where a proposal would lead to less than substantial harm, this should be weighed against the public benefits of the proposal.

Planning Practice Guidance (PPG)

5.52 On 6 March 2014, the Department for Communities and Local Government (“DCLG”) launched the Planning Practice Guidance web-based resource. Relevant sections are as follows:

- Biodiversity net gain.
- Design: process and tools.
- Determining a planning application.
- Environmental Impact Assessment.
- Flood risk and coastal change.
- Healthy and safe communities.
- Historic environment.
- Minerals.
- Natural environment.
- Open space, sports and recreation facilities, public rights of way and local green space.
- Transport evidence bases in plan making and decision taking.
- Travel Plans, Transport Assessments and Statements.
- Water supply, wastewater and water quality

National Design Guide

5.53 The National Design Guide was published by the Ministry of Housing Communities and Local Government. It builds on the guidance set out in the NPPF and its accompanying Guidance, and outlines the Government’s priorities for well-designed places in the form of ten characteristics as follows:



Planning Analysis

6

6.1 This section analyses the suitability of the proposed development in the context of local and national planning policy. Given the location of the site within two LPA areas, this section considers policies for both EBC and WCC.

6.2 Starting with the principle, this section demonstrates that the proposed development represents sustainable development which is in accordance with the Development Plans and that the benefits of the scheme outweigh any other material considerations.

6.3 Reference is made within this section to assessments within technical reports that have been submitted in support of the planning application. Those should however be referenced in full as part of the assessment of the planning application.

Principle of Development incorporating Landscape and Design Considerations

6.4 This section sets out how the proposed development is acceptable in principle in terms of use and form. This includes a consideration of technical matters referred to in relevant policies however the full technical detail is provided in the remainder of section 6. It also includes considerations relating to design and landscape as these points are fundamental to the assessment of the likely impact of the proposals on the countryside.

6.5 The key in principle considerations relate to the countryside location of the site and the enhancement of an existing sports facility and local business.

6.6 The site is located in the countryside in its entirety according to the adopted and emerging EBC and WCC local plans. Both authorities support new development in the countryside where it has

an operational need for a countryside location, including outdoor recreation uses and the expansion or redevelopment of established buildings.

6.7 For clarity, the relevant policies in this regard are as follows:

- EBC Strategic Policy S1 (Delivering sustainable development), S2 (Approach to new development), S4 (Employment provision), S5 (New development in the countryside), Policy DM18 (Extension and replacement of non-residential buildings in the countryside), Policy DM34 (New and enhanced recreation and open space facilities) and Policy DM36 (Community, leisure and cultural facilities).
- Adopted WCC Policy DS1 (Development strategy and principles), MTRA1 (Development strategy Market Towns and Rural Area), MTRA4 (Development in the countryside), CP6 (Local services and facilities), CP7 (Open space, sport and recreation), CP8 (Economic growth and diversification), DM1 (Location of new development) and DM13 (Leisure and recreation in the countryside).

- Emerging WCC Policy SP2 (Spatial strategy and development principles), SP3 (Development in the countryside), NE3 (Open space, sport and recreation), NE13 (Leisure and recreation in the countryside), Strategic Policy E1 (Vibrant Economy), Strategic Policy E2 (Spatial distribution of economic growth), Policy E9 (Economic development in the rural area).
- NPPF Chapter 6 (Building a strong and competitive economy) and Chapter 8 (Promoting healthy and safe communities).

6.8 This proposal has an operational need for a countryside location as an established golf course and is therefore, entirely appropriate in this location. As the works relate to an existing use as a golf club and event venue, the proposed works will not change the operation of the site or the character of the use which will remain as existing.

6.9 The use of the site as a golf course has been long established since EHGC opened in 1992. This proposal seeks to upgrade the facilities at EHGC to enhance the playing experience for members and visitors.

6.10 The full element relates to reprofiling of parts of the course, the reorganisation of tee boxes, fairways and greens and the provision of associated landscaping and drainage infrastructure. These works are essential as a response to the operational issues being experienced at present and will help to prevent partial or full closures of the courses and associated restrictions such as no use of golf buggies etc.

6.11 The proposals will also enhance the facilities available for events which already take place on site, particularly through the provision of enhanced garden spaces on land that is currently associated with the driving range. Across the country, golf clubs are popular venues for events including weddings, conferences etc. EHGC is a popular event venue in the local area which continues to experience high demand with bookings being made up to 3 years in advance. It makes a significant contribution to the local economy as a result of both the golf and event offer. In addition, EHGC is a key local employer with over 50 permanent staff, many of whom live within the Borough / District.

6.12 Therefore, there can be no question of the principle of the proposed development. Although the proposal is within a countryside location, there is an unavoidable operational need for it. The proposed works are for the benefit of a well-established local business and leisure facility and would not result in any change of use. Although it is necessary to demonstrate that no harm arises in relation to the relevant technical matters, the principle of acceptability is firmly established.

6.13 The only additional building proposed is the new driving range which is applied for in outline. This will replace the existing driving range which, as discussed in further detail above, is extremely under-utilised, even in peak summer months. The existing driving range will close as a result of this proposal and the new driving range will be relocated on the wider site, moving from Phase 1 to Phase 2 to a more appropriate location operationally. The

existing driving range structure will remain. The retention of the existing structure is considered to be a sustainable approach to development. Overall, the provision of a high quality driving range is essential for a golf course of this size and standard in order to provide a warm up area for golfers before a round or an alternative to a round in winter months.

6.14 The proposed works are ancillary and essential to the lawful use of the land as a golf course and represent the minimum quantum of development required for the operation of the site. They will ensure a continuing supply of high quality sports facilities within the local area in addition to continued economic benefits associated with EHGC which as noted above, is a significant local employer.

6.15 Looking at technical matters relevant to these in principle policies:

- There is an established maintenance regime for EHGC and this will be adapted as a result of this proposal to encompass the proposed works (S5 and DM34).
- Access to the site is already established and will continue to operate as existing. This is adequate for the use of the site. The proposals are also not anticipated to increase trip generation as they relate to an existing use (MTRA4 and DM34).
- The proposals would not sterilise any mineral resources (S5).
- A Construction Environment Management Plan could be secured by condition if necessary to ensure soils are protected during construction (S5).

- The proposals relate to an existing use which has operated for a considerable period of time and is both appropriate and sensitive in relation to neighbouring properties. The proposals would not cause any further impacts on these specifically regarding noise or light and if necessary, conditions could be imposed for these matters (MTRA4, DM13 and NE13).
- Measures to improve the water environment are proposed (SP3).

6.16 The detailed technical sections below demonstrate how the specific criteria noted above for these policies are met in full but overall, it is considered that technical matters can be addressed.

6.17 The policies relating to the principle of development all include criteria relating to design, physical impacts, visual impacts and urbanising effects. In addition, the following policies are also relevant to these matters:

- EBC Policy DM1 (General criteria for new development).
- EBC Policy DM18 (Extension and replacement of non-residential buildings in the countryside).
- WCC Policy CP13 (High quality design).
- WCC Policy CP19 (South Downs National Park).
- WCC Policy CP20 (Heritage and landscape character).
- WCC Policy DM15 (Local distinctiveness).
- WCC Policy DM16 (Site design criteria).

- WCC Policy DM17 (Site development principles).
- WCC Policy DM23 (Rural character).
- WCC High Quality Places SPD.
- WCC Landscape Character Assessment SPD.
- Emerging WCC Strategic Policy D1 (High quality, well designed and inclusive places).
- Emerging WCC Strategic Policy D4 (Design principles for market towns and rural areas).
- Emerging WCC Policy NE8 (South Downs National Park).
- Emerging WCC Policy NE9 (Landscape character).
- Emerging WCC Policy NE14 (Rural character).
- WCC Landscape Character Assessment SPD.
- WCC High Quality Places SPD.
- NPPF Chapter 12 (Achieving well-designed and beautiful places).
- The National Design Guide.

6.18 This application is accompanied by a Landscape and Visual Appraisal prepared by Deacon Design and Design and Access Statement which is contained within the preceding sections of this statement. As demonstrated in the wider submission, a high quality of design is adopted that is in keeping with existing development on this site.

6.19 The accompanying LVIA assesses the impact of the proposals in landscape and visual terms. Whilst this should be referred to in full, a brief

summary is provided below. Overall, this confirms that the proposals are acceptable for this location in landscape and visual terms.

6.20 The starting point for assessment is that the site is part of an existing golf club and the proposals comprise works that are characteristic of such a use. The wider EHGC site forms a unique landscape feature in its own right and the proposed works are in keeping with this. Overall, the distinctiveness of the site relates to its existing use as a golf course and its associated landforms and features. The proposals respond to this effectively.

6.21 The LVIA notes that the wider EHGC site has a high capacity to accommodate the proposed improvements without undue consequences for the baseline situation. It advises that there are many opportunities for the protection of key landscape features and that the mitigation measures proposed



Existing driving range

are likely to be very effective for the proposed development. Notably, the mitigation measures for the proposed driving range building, incorporating changes to the landform within Phase 2 and its associated woodland and grassland planting will allow the building to fit within its surroundings in a sympathetic manner.

6.22 In terms of visibility from the surrounding landscape, the LVIA notes that this is heavily limited by both the existing landform and wooded areas which provide screening from almost all directions. Views of the site are mainly from within the wider golf course itself and whilst there are some limited glimpses from the following locations, views from the local landscape are considered to be very limited overall:

- An edge of new development along Pembers Hill Drive.
- A small area of private farmland c. 250m to the south-west of Phase 1.
- From the south facing slopes of farmland to the west of Upham.

6.23 The LVIA concludes that the small geographical area of the site's visibility, the existence of natural screening factors and the nature of the proposals on an existing and longstanding golf course would result in a very limited level of landscape and visual effects associated with the proposed development. It goes on to consider the landscape and visual effects overall and these are summarised below.

Landscape Effects

6.24 The LVIA notes that construction effects associated with a temporary loss of landscape would be adverse but of a low level due to their temporary character and very short term duration. It concludes that this would cause up to **minor adverse effects** on landscape features within the site, as well as **minor / negligible adverse** construction effects on the landscape character.

6.25 For operational effects, considerations relate to changes to landform, vegetation and built form. The LVIA notes that the remodelled landform will be grassed and planted to enable it to blend in with the golf course and that overall there will be a net gain of landscape features which will add value to the golf course's landscape. The effect on landscape features is considered to be **minor / negligible beneficial**. Whilst these improvements are compatible with landscape character and would have a positive impact on local landscape character, the proposed driving range building and associated landform are the most visible aspects of the proposal and would have an adverse impact. This element of the scheme is considered to have a **minor / negligible adverse effect** on landscape character.

6.26 Considering views from the SDNP, the only potential addition to views from the SDNP would be of the planting on the upper slope of Phase 2. The LVIA concludes that this would have a positive and barely perceptible impact in the existing wooded context and the operational impact

on the SDNP has therefore, been assessed as **negligible beneficial**. As such, it is considered that the proposals are in keeping with the context and setting of the SDNP.

Visual Effects

6.27 The proposals would be most visible when viewed from EHGC including by staff and visitors. These would be **moderate / minor adverse** during construction and **minor beneficial** at the operational stage once landscaping has become established. Visual impacts would occur at a very small geographical area and the small scale of the changes in views across the golf course combined with the significant planting proposed would in time enhance visual amenity within the golf course.

6.28 The proposed driving range would be visible from its immediate environs but would also form an appropriate addition in its current context, softened by the tree planting proposed on the north facing slope of the remodelled driving range. It is acknowledged that the proposed driving range would introduce a new structure in an area which is currently free from built form however the adoption of a sensitive design approach incorporating extensive landscaping will ensure that this feature can integrate effectively within its surroundings. In particular, the proposed landform surrounding the driving range will provide screening of this from the surroundings, including the SDNP. As the proposals are confined to the EHGC site, the proposals are not anticipated to have an adverse impact on the setting of settlements.



6.29 The LVIA includes wireframes to assess the visibility of the proposals from recognised public views, features or skylines.

6.30 The LVIA and wireframes demonstrate that the only other views of the proposal are internal to the site, i.e. the works cannot be seen or perceived from any other public area. These are shown on the following pages.



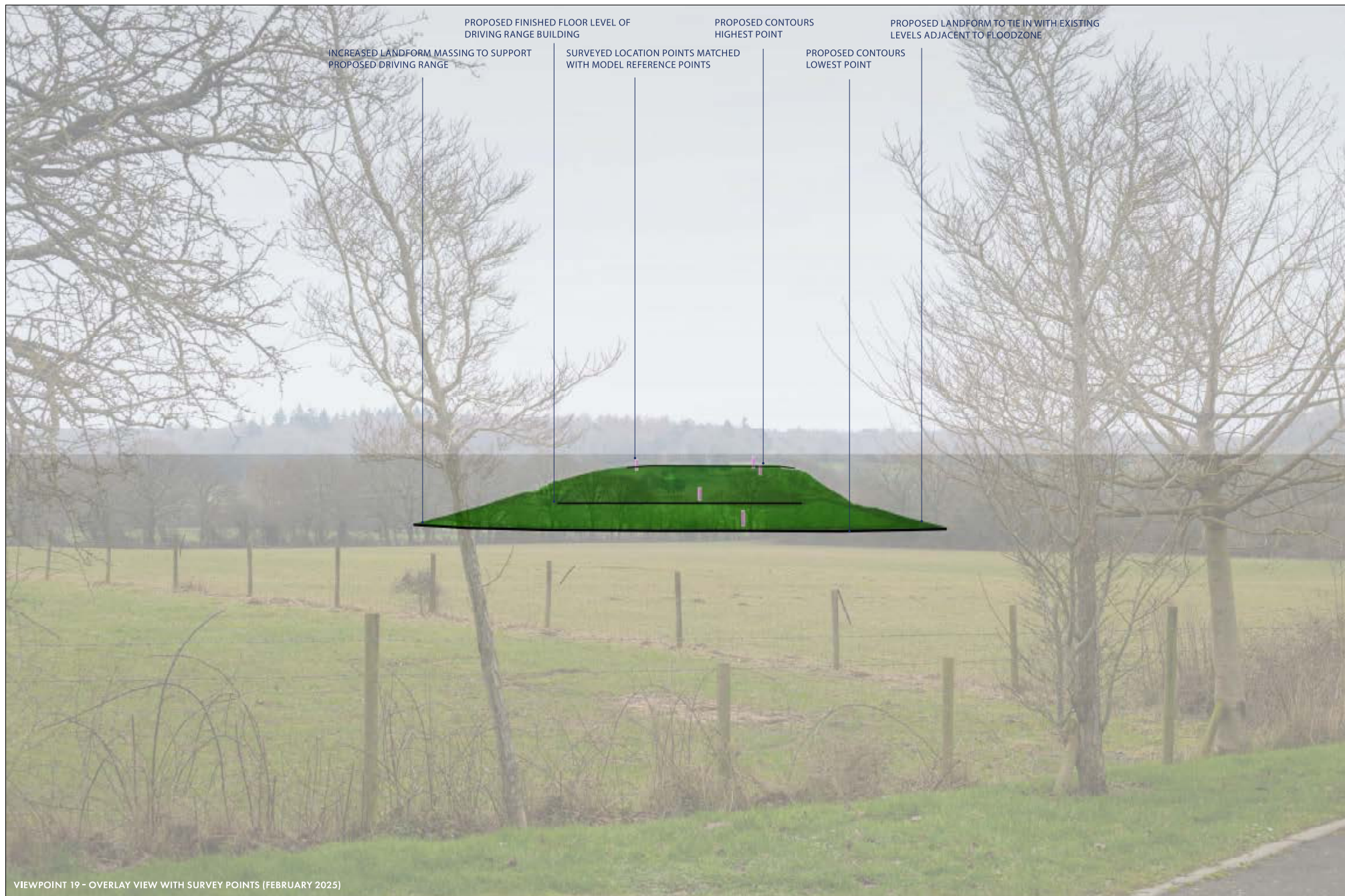
VIEWPOINT 17 - BASELINE VIEW (FEBRUARY 2025)







VIEWPOINT 19 - BASELINE VIEW (FEBRUARY 2025)





6.31 The LVIA advises that most local residents would not experience any change to their amenity. There are a small number of properties within and adjacent to the golf course and a small cluster of buildings at Pembers Hill Drive that would experience very limited views of the proposals. Overall, construction impacts on local residents is considered to be **minor adverse**. Once the development is operational and landscaping has become established, the overall effect on local residents is assessed as **minor / negligible beneficial**.

6.32 The construction effects on users of local public rights of way, users of long distance paths within the SDNP and users of local roads would not be higher than **minor adverse** with **negligible** and barely perceptible significance. As such, it is not considered that this proposal would be detrimental to the overall enjoyment of the countryside from the public realm or public rights of way.

6.33 In terms of an urbanising effect, the majority of the proposed works comprise reprofiling of land to create landform, landscaping or drainage works and these are not considered to comprise urbanising features. They are natural features that are characteristic of golf courses and it is noted that the drainage works comprise natural features in the form of swales. The proposed reprofiling and associated landscaping will effectively screen the driving range building ensuring it does not result in visual intrusion in the countryside and no other works are sought which could be considered to have an urbanising impact in this location.



Landscape Masterplan

6.34 Regarding tranquillity, the proposals seek to deliver enhancements to established uses on this site. The nature of the proposals is such that they will not be noisy or excessively lit, ensuring that tranquillity is maintained as existing.

6.35 Having regard to the above, the LVIA confirms that the proposals would be acceptable in this location in terms of their physical and visual impacts.

6.36 Overall, the design approach has been carefully considered and landscape led, drawing on a review of the immediate surroundings and this has helped to provide an understanding of the site's context which the proposed development has been designed to respect. The proposals have been informed by input from a specialist golf architect with extensive experience of projects of this nature.

6.37 The footprint and height parameters for the proposed driving range building will be set by this application and are considered to be appropriate for this site. The full detail to be secured via a detailed reserved matters application in due course.

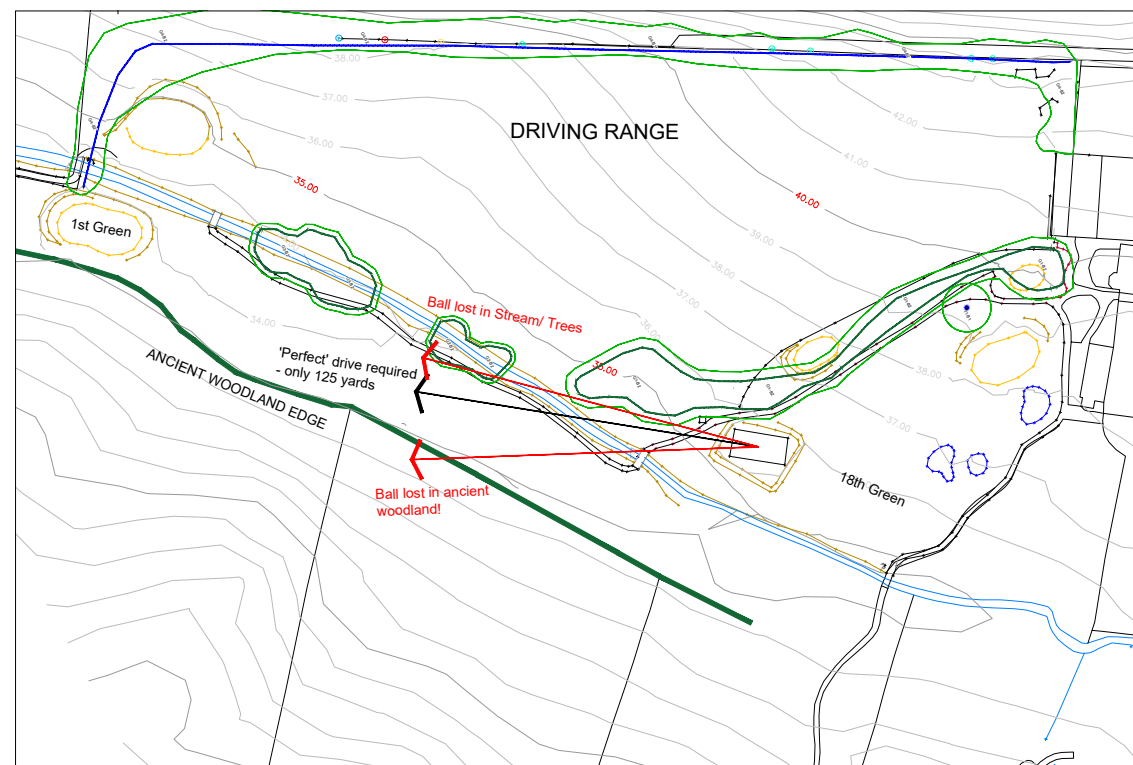
6.38 The consultant team used the process of LVIA to inform their landscape design. The initial desktop analysis and field-based studies established the existing baseline of landscape character and the sites visual envelope. The outcomes of this work informed the design, which evolved via an iterative process by collaboration with the project architects, ecologist and arboriculturist.

6.39 The proposed landscape design recognises the character of the site and its surroundings and is based on an understanding of the design principles of the wider landscape, acknowledging and reinforcing the trees, hedgerows, water features and corridors which contribute to local distinctiveness. The proposals seek to deliver a mixture of woodland and grassland planting which are beneficial to both landscape and biodiversity.

6.40 The design concept has been prepared by EDI. EDI are an international golf course architectural firm and member of the European Institute of Golf

Course Architects. EDI are currently working on 50 golf courses across 10 countries, with projects of all types from new build to course renovation to sustainability and drainage.

6.41 EDI were invited by EHGC and tasked with improving the overall flow of the start and finish of the course and the connection to the practice facilities from the Clubhouse. The existing range facility in conjunction with the 1st hole have always been underperforming in undesirable locations meaning that player experience is falling short of expectation.



Existing 1st Hole

6.42 EDI's concept was to move the 1st fairway away from the dark, small gap between the ancient woodland and the stream – which is currently the toughest tee shot on the course – and move it wholesale to the other side of the watercourse where there is space, light and air and the ability to grow high level turfgrass. The green itself would be played to from the fairway across the water instead of alongside which adds an element of strategy and excitement for all visiting golfers. In conjunction with this, formal gardens could be developed on the old driving range area for member exercise, health and wellbeing as well as garden space for weddings and larger groups. At the Clubhouse end, the development of new tees would be realigned for this hole-centre-line change which would give an opportunity to redevelop the 18th green and approach in its entirety and for a new practice facility and patio to be provided adjacent to the bar areas.

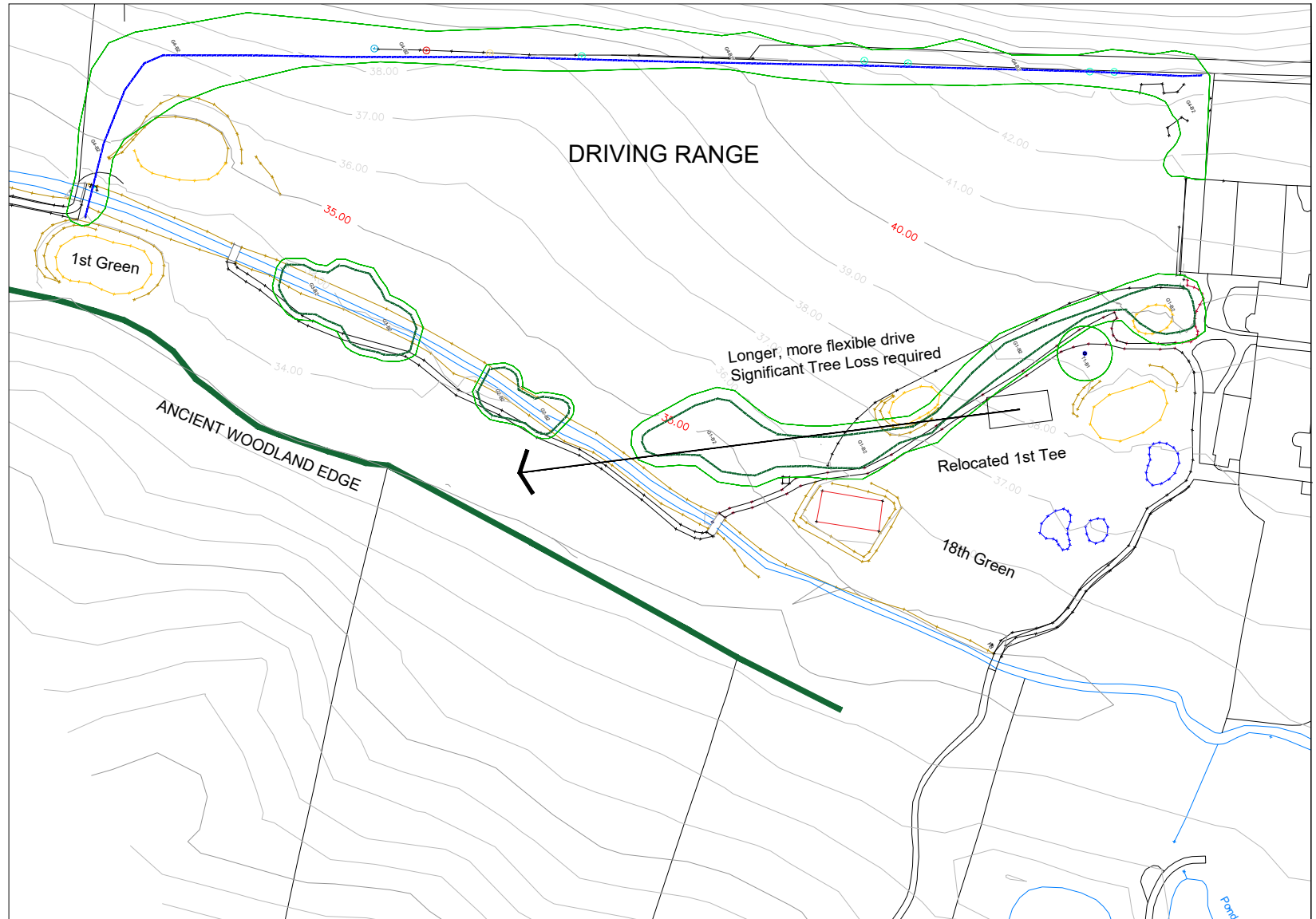
6.43 Part of the desire was also to rearrange the area containing the Greenside Bar, 1st Tee and 18th Green which are in close proximity to each other. As set out in preceding sections, these elements overlap. There is a clear desire and ability to improve the flow and relationship of these areas.

6.44 Following the very initial concepts and brief a wider team of consultants was commissioned to undertake comprehensive surveys of the site. These were compiled into Opportunities and Constraints Plans (which are application documents) to fully inform the design proposals.



6.45 Several different options were considered, including:

[1] Retaining the existing 1st Fairway with a marginally relocated 1st Tee to 'open' the angle of the initial tee-off. This option required a lot of tree removal to facilitate the desired line, whilst doing little to improve the actual fairway which is firmly constrained between the Watercourse and Ancient Woodland.



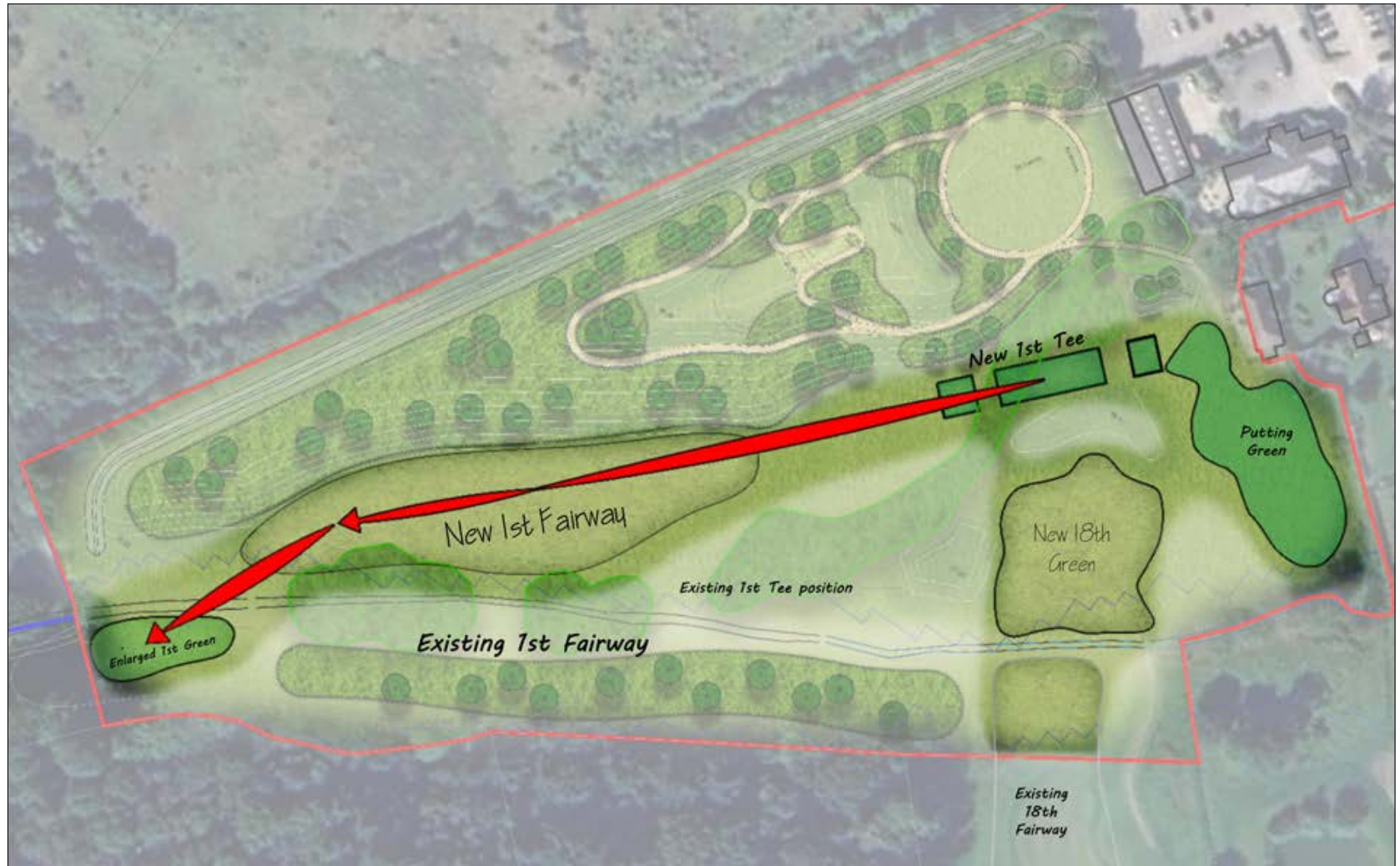
Option 1 - 1st Hole Plan

[2] A split 1st Fairway giving players the option to play along the existing fairway or a new fairway along the bottom of the Driving Range. This option gave a lot more flexibility to players and helped resolve many of the initial issues. However, this still required a lot of tree removal to achieve the necessary sightlines.



Option 2 - 1st Hole Plan

[3] A new 1st Tee and Fairway along the bottom of the existing Driving Range. This option was eventually selected as the best overall balance. Although the proposal makes the existing 1st Fairway redundant, the uses of this area are limited given the many constraints here. The option allows most flexibility in positioning the Tee Box and the final position requires the removal of just two relatively immature trees.



Preferred Option 1st Hole Plan

6.46 By relocating the 1st Tee box as proposed this frees up a lot of space around the 18th Green. This allows the opportunity to enlarge the 1st Green and to introduce physical and visual separation between the 1st Tee and 18th Green whilst maintaining overlooking from the Greenside Bar.

6.47 The design concept around the proposed Gardens is to put the existing Driving Range area to a beneficial use and to enhance the existing landscape setting. Although a popular wedding and event venue, with the attractive parkland setting being a key draw, EHGC has no formal gardens or external areas where guests can walk / gather, have photographs taken and enjoy the beautiful setting of the venue.

6.48 The proposed garden area is designed to work with existing topography with a large, level garden space. The garden area is positioned close to the Greenside bar and clubhouse, which are the key venue spaces, with views of the golf course that are partially screened by the existing treeline. The positioning means that the garden can be easily accessed from the two venues and clearly forms part of the wider setting whilst also maintaining a degree of visual and physical separation.

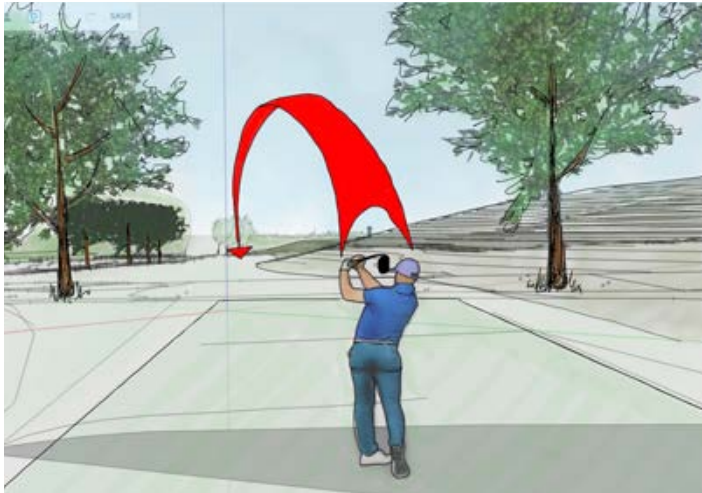
6.49 Further down the driving range, moving away from the clubhouse, the landscape setting is extremely poor. The surface comprises poor quality grassland with the boundary consisting of sporadic hedgerow with an 8 foot chainlink fence visible across large lengths of the gap. Behind the boundary is the landfill site which provides

an unsightly backdrop. Longer views towards the Southwest are marred by visible aerials in the distance. Another important requirement was to alleviate overland surface water flows across the driving range area from the adjoining landfill.

6.50 On the positive side, the Driving Range is free from significant constraints.



6.51 There is the need to consider the relationship of the fairway with the adjoining areas, and in particular the requirement to 'capture' any stray balls as well as to delineate the fairway edge and create an appropriate setting.



Concept image of New 1st Tee

6.52 The preferred option is to continue lifting the levels up from the garden area, enclosing the new fairway and giving an attractive backstop to the garden. In addition to terminating views and creating a more appropriate setting, it gives the opportunity to extend the garden and planting into a less formal area incorporating circular walks and a viewpoint overlooking much of the 1st hole of the Greenwood Course. The proposal strikes the right balance between separating and interrelationship between the garden and fairway. Finally, the proposed landform serves the additional purposes of screening views of the existing boundary and landfill behind, and allowing formation of a swale to intercept, filter and discharge surface water runoff from the landfill site.



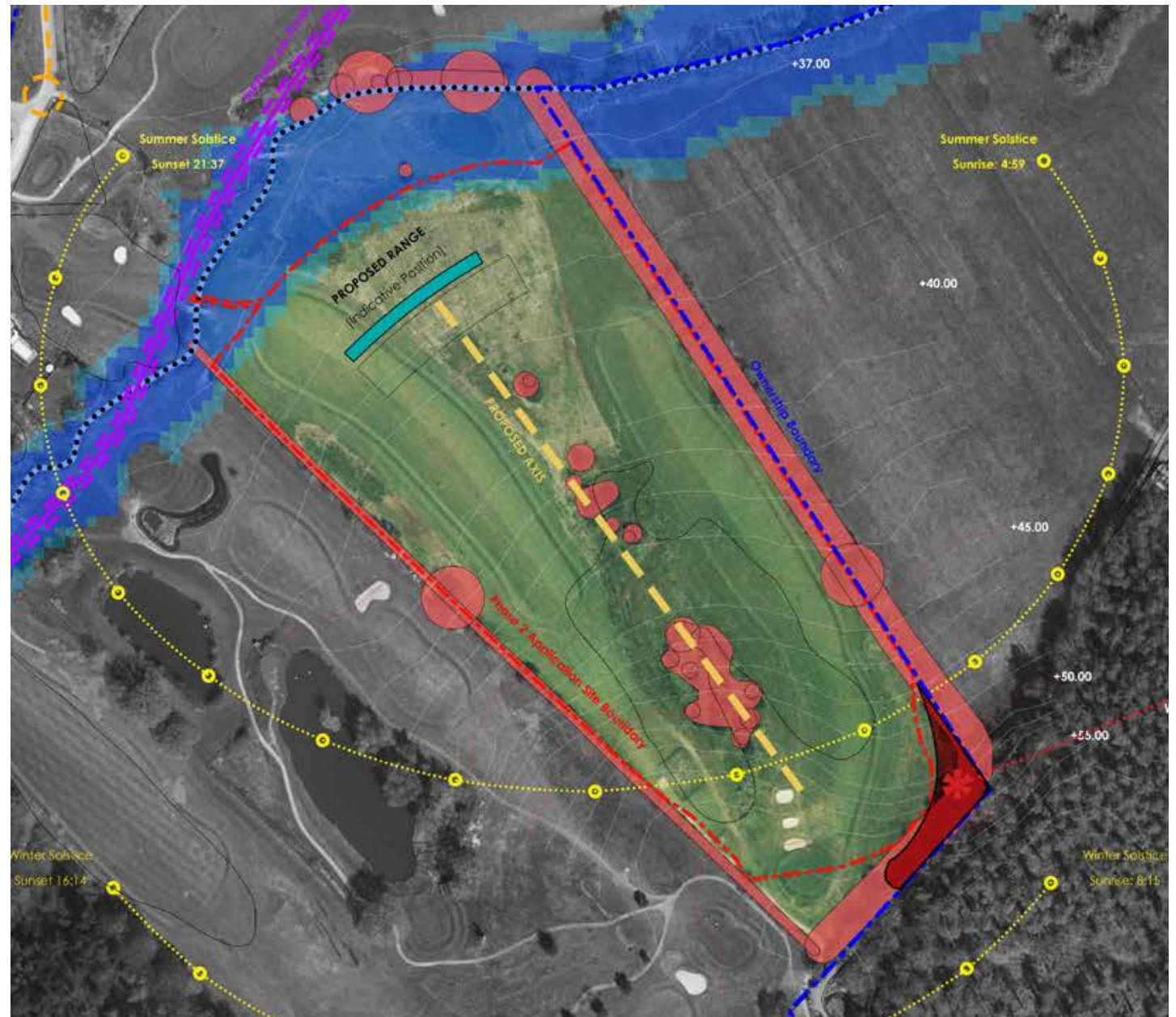
Early Landscape Concept

6.53 The extensive space also allows for substantial planting and wildlife areas which both improve the visual appearance from all angles and provide for biodiversity enhancements and reinforcement of existing habitats around the site.

6.54 The primary brief for Phase 2 is to create a new functional 300-yard Driving Range in an accessible location. At the same time, the proposal must respect the site setting, constraints and functionality of the existing Parkland Course. The site for this requires sufficient space to safely accommodate stray balls without the need for physical barriers such as netting, which would likely introduce a jarring and unattractive feature.

6.55 The current location was selected following an initial walkover and assessment of the Parkland and Greenwood Courses. As confirmed by the opportunities and constraints plans, there are minimal constraints in the area and so changes can be accommodated with minimal impact. Much of the northern parts of the area are low-lying and poorly drained, such that the existing holes function poorly. Standing water and boggy areas extend a surprising distance up the slope. The gradient and ground conditions mean that traction for walkers, trolleys and buggies is an issue year-round; this in turn churns up the surface to exacerbate the issue.

6.56 Preliminary studies demonstrated that the Parkland Course could sustain the closure of the three holes within this area. Although the study shows how these could be re-provided through a potential future phase of development, they can



O & C Plan Phase 2 (extract)

be also be substituted on a temporary basis for the medium to longer term. Therefore, the proposed area is a sustainable area for the business whilst having lowest overall impact.

6.57 Driving range requirements are relatively simple; building requirements are for a long, open-fronted building divided into a series of bays. A minimum height of 4.2m needs to be achieved with sufficient depth to accommodate bays plus access. Depending on the design of the Driving Range, it may be preferable for the building to be curved so that each bay is focussed on a central target.

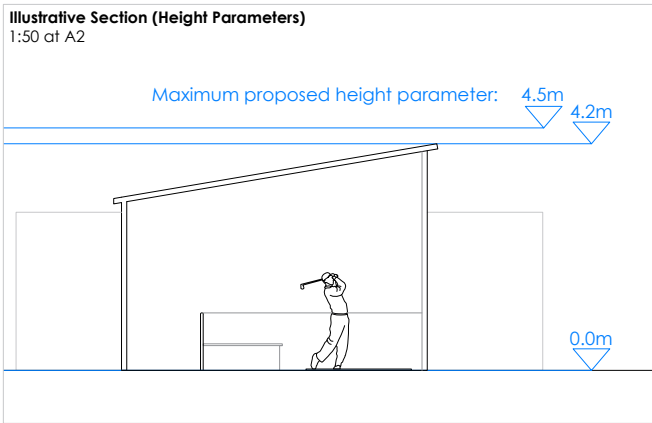
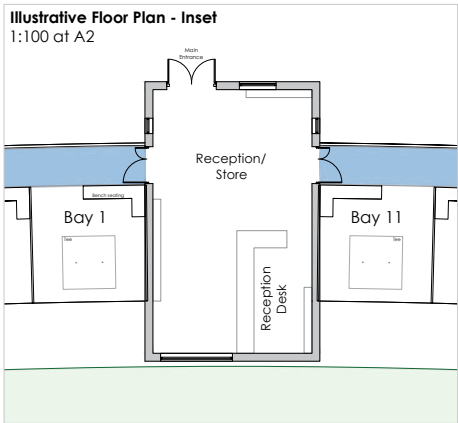
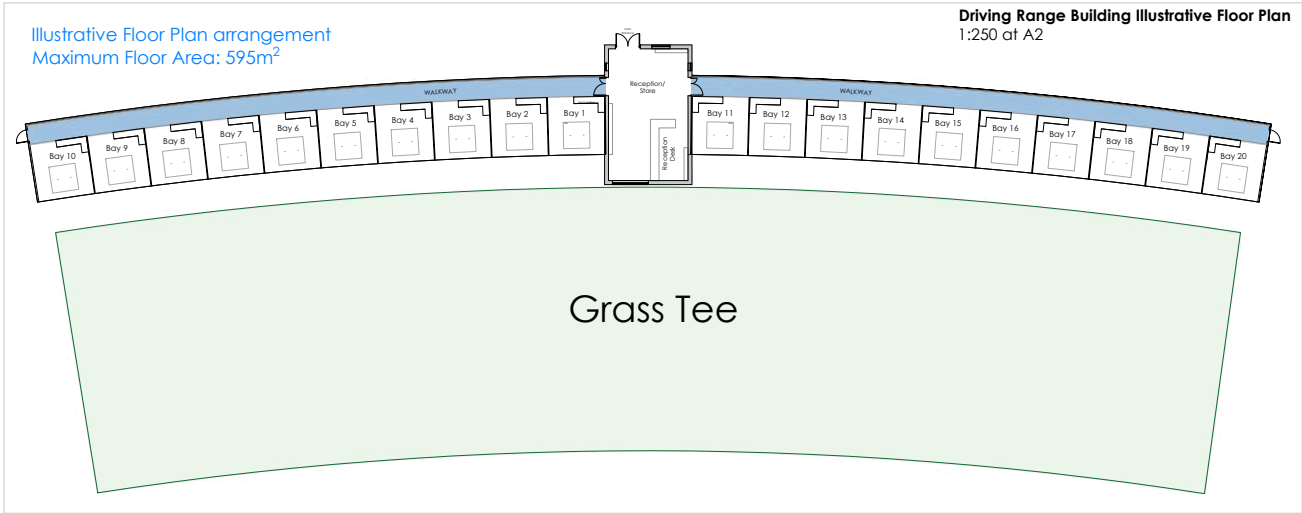
6.58 Depending on the operation and management of the driving range it may be desirable to incorporate a central reception building, allowing players to use the driving range on a standalone basis and without checking in at the clubhouse.

6.59 The building needs to be accessible by pedestrians, plays with trolleys, and by golf buggies. The decision was taken, based on constraints planning, to reuse the existing pathway from the clubhouse and existing water crossing. This path was found to have adequate surfacing and is along the most direct route; it's reuse avoids the need for works or change in levels within the Flood Zone. Following detailed consideration, two route options have been provided to the driving range building – a DDA-compliant path which is also accessible to buggies and trolleys, and a more direct stepped route.

6.60 Adjacent the proposed building a small level area is proposed for the parking of buggies and trolleys.

6.61 The range needs to be uniform, although a gradual upwards gradient can provide an attractive feature, and having sufficient width to accommodate multiple tee positions and to capture any stray balls. A key requirement is to accommodate a full 300-yard driving range with target greens at 50-yard intervals.

6.62 The concept evolved to raise the edges of the driving range so that it is sited within a slight depression. The raised edges serve to screen the range from external views and will help to capture and centralise stray balls.



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Driving Range building parameters

6.63 The proposed driving range also incorporates minor landform features and planting at the far end, functioning as a target and also helping blend the proposal into existing topography.

6.64 Having regard to the above, it is considered that the proposed development would be acceptable in principle as it:

- Seeks to enhance an existing golf club which is an established use and entirely appropriate for this location as set out in adopted and emerging policy.
- Addresses the technical requirements associated with the relevant policies discussed in detail in this section.
- Seeks to deliver development which is appropriate in landscape and visual terms, characteristic of the existing golf course. It would not give rise to adverse impacts on the wider landscape and would not result in an urbanising effect or visual intrusion in the countryside as confirmed in the accompanying LVIA.
- Has been carefully designed to enhance the landscape setting within the site.

6.65 Based on this discussion above, this proposal is considered to comply with adopted EBC policy S1, S2, S4, S5, DM1, DM18, DM34 and DM36; adopted WCC policy DS1, MTRA1, MTRA4, CP6, CP7, CP8, CP13, CP19, CP20, DM1, DM13, DM15, DM16, DM17, DM23; the WCC Landscape Character Assessment SPD; WCC High Quality Places SPD;

emerging WCC policy SP2, SP3, D1, D4, NE3, NE8, NE9, NE13, NE14, E1, E2 and E9; chapter 8 and 12 of the NPPF; the National Design Guide.

Other Material Considerations

6.66 The principle of development is supported by the development plan and the remainder of this chapter examines other considerations to demonstrate that in all other regards the proposal conforms with the policy framework including the development plan and the NPPF. These are discussed below.

Trees, Ecology and Biodiversity Net Gain (BNG)

6.67 This application is accompanied by the following documents:

- Arboricultural Survey and Arboricultural Impact Assessment prepared by ArborEco.
- Preliminary Ecological Appraisal prepared by Ecosa.
- Extended Phase 1 Archaeological Assessment and Phase 2 Surveys prepared by Phillips Ecology.
- BNG Assessment prepared by Phillips Ecology.

6.68 Both authorities have policies that seek to secure the provision or enhancement of green infrastructure and the protection, conservation or

enhancement of international, national and local nature conservation designations, ensuring a net gain of biodiversity. Where adverse impacts are anticipated, these need to be justified. Policies seek to secure appropriate buffers and surveys to be undertaken for species where necessary.

6.69 For clarity, the relevant policies in this regard are as follows:

- EBC Strategic Policy S9 (Green infrastructure) and Policy DM11 (Nature conservation).
- EBC Biodiversity SPD.
- EBC Trees and Development SPD.
- Adopted WCC Policy CP15 (Green infrastructure), Policy CP16 (Biodiversity) and Policy DM24 (Special trees, important hedgerows and ancient woodlands).
- Emerging WCC Strategic Policy (Strategic Policy NE1: Protecting and enhancing biodiversity and the natural environment in the district), Policy NE4 (Green and blue infrastructure), Policy NE5 (Biodiversity) and Policy NE15 (Special trees, important hedgerows and ancient woodlands).
 - NPPF Chapter 15 (Conserving and enhancing the natural environment).

6.70 The submitted Arboricultural Impact Assessment confirms that the following trees require relocation to facilitate the proposals:

- Trees within group G1 to enable the landscaping changes proposed in Phase 1.
- The removal of T8, T9, T10, T11, T12, T13, T14, T15, T16, T17, T18, T19, T20 and T21 and groups G3 and G4 to enable the driving range and landscaping changes proposed in Phase 2

6.71 These trees will not be lost but will be translocated elsewhere on site. This, combined with extensive new planting across the site will deliver wider environmental benefits overall including for landscape and biodiversity and ensuring that the sites amenity value is enhanced.

6.72 Tree protection methods are also suggested for retained trees and there are a number of veteran or ancient trees located in close proximity to the site which are outside of the red line and can be adequately protected.

6.73 Regarding the adjacent Durley Copse SINC / Ancient Woodland to the south east, the relocation of the fairway for the 1st hole and the replacement woodland planting will form an enhancement. Moving the fairway further away from this will reduce the number of golf balls entering the ancient woodland and subsequent footfall to retrieve these. The provision of replacement woodland planting will reinforce the overall woodland network of the site.

6.74 The Extended Phase 1 Ecological Assessment and Phase 2 Surveys assess the ecological value of the site, making recommendations to avoid negative impacts, deliver necessary mitigation and propose options for ecological enhancements. They conclude that:

- The modified grassland on the Phase 1 area has low botanical value.

- The treelines, native hedgerows, ditch and scrub habitats on the Phase 1 area have a high ecological value
- The modified grassland on the Phase 2 area has low botanical value.
- The scattered and lines of trees, ditch and scrub habitats on the Phase 2 area have a high ecological value.



View towards Durley Copse SINC / Ancient Woodland

6.75 The Extended Phase 1 Ecological Assessment confirmed that the site supports suitability for a variety of species. As such, further surveys were undertaken to confirm their status on site and the accompanying report provides details of mitigation and precautionary avoidance measures.

6.76 Overall, the site is considered to support opportunities for protected and priority species including, foraging bats, breeding birds, great crested newts, dormice, badgers and hedgehog.

6.77 It is considered that impacts can be avoided for hedgehogs, reptiles, foraging and commuting bats and breeding birds with the implementation of mitigation and precautionary avoidance measures.

6.78 The loss of the recorded badger sett and areas of great crested newt terrestrial habitat will require development and mitigation licenses to be in place prior to commencement.

6.79 Opportunities for enhancements at the site level are suggested including the provision of bat, bird and invertebrate boxes.

6.80 The proposals would exceed the minimum 10% biodiversity net gain (BNG) requirement, delivering wider benefits for biodiversity.

6.81 Based on the discussion above, this proposal is considered to comply with adopted EBC policy S9, DM11; the EBC Biodiversity SPD; the EBC Trees and Development SPD; adopted WCC policy CP15, CP16 and DM24; emerging WCC policy NE1, NE4, NE5 and NE15; and NPPF chapter 15.

Heritage

6.82 This application is accompanied by an Archaeological Desk Based Assessment prepared by Thames Valley Archaeological Services which considers the archaeological and heritage context of the site and assesses these in relation to the proposals.

6.83 Both authorities have policies that seek to conserve or enhance heritage assets in a manner that is appropriate to their significance, avoiding harm to heritage assets and their settings. This includes for development on a site identified or discovered through development proposals as an archaeological site, requiring remains to be preserved in situ or if this is not possible, securing a programme of archaeological works including investigation and recording prior to commencement.

6.84 For clarity, the relevant policies in this regard are as follows:

- EBC Strategic Policy S8 (Historic environment) and Policy DM12 (Heritage Assets)
- Adopted WCC Policy CP20 (Heritage and landscape character), DM26 (Archaeology) and DM29 (Heritage assets).
- Emerging WCC Strategic Policy HE1 (Historic Environment), HE2 (Heritage Assets), HE3 (Designated Heritage Assets), HE7 (Non designated archaeological assets) and HE8 (Applications affecting Listed Buildings).
- NPPF Chapter 16 (Conserving and enhancing the historic environment).

6.85 The accompanying desk based assessment assesses the site proposals to clarify its below ground archaeological potential prior to development. This concludes that there are no known heritage assets on the site but that fieldwork and excavation on a neighbouring site had revealed Roman features. There is potential for unknown archaeology, particularly on the Phase 1 area. It is recommended that a scheme of evaluation is drawn up and we note that this could be secured by a suitably worded planning condition.

6.86 The site is adjacent to two Grade II Listed Buildings known as East Horton Farmhouse and Barn South East of East Horton Farmhouse. These are located outside of the site. East Horton Farmhouse is a private residence, whilst the Barn has been converted to a bar / restaurant, known as the Greenside Bar. Both sit within the wider context of the golf course with the Greenside Bar having no curtilage, other than its patio / seating area, and East Horton Farmhouse having a residential curtilage. East Horton Farmhouse and its curtilage is largely screened from view.

6.87 The starting point is that these buildings are on the wider EHGC site which has, since 1992, formed part of their setting and immediate local context. The proposals seek to provide development which is characteristic for a golf course and in keeping with the established use and context. The proposals have been designed to be sympathetic to these designated heritage assets and their setting.



View towards adjacent Grade II Listed Buildings

6.88 The proposed works are generally distant from both buildings and although there is some partial intervisibility, screened by trees and hedgerows, the separation is at such a distance that there are limited views to perceive the buildings and proposed works together.

6.89 The Phase 1 works relate to reprofiling of parts of the course, the reorganisation of tee boxes, fairways and greens and the provision of associated landscaping and drainage infrastructure. The proposed works will not change the character of the setting of the Listed Buildings which will remain as a golf course. The works will result in an enhancement

overall by providing attractive screening of the adjacent landfill site and the sparsely-vegetated site boundary characterised by an 8ft chainlink fence.

6.90 The Phase 2 works relate to the construction of a new driving range building in addition to associated reprofiling, landscaping and drainage infrastructure. These will be separated from the adjacent Listed Buildings by a significant distance and a sensitive design approach will be adopted incorporating reprofiling and extensive landscaping. The full detail for the driving range building has been via a detailed reserved matters application in due course.

6.91 Based on the discussion above, this proposal is considered to comply with adopted EBC policy S8 and DM12; adopted WCC policy CP20, DM26 and DM29; emerging WCC policy HE1, HE2, HE3, HE7 and HE8; and NPPF chapter 16.

Flood Risk and Drainage

6.92 This application is accompanied by a Flood Risk Assessment prepared by Odyssey.

6.93 Both authorities have policies that seek to development is resilient to client change including by addressing surface water flooding and utilising sustainable drainage systems where feasible. Policies repeat national policy by requiring the sequential and exception tests where appropriate and seeking to ensure that proposals are safe for their lifetime and do not increase flood risk elsewhere. There is a focus on natural flood management techniques and naturalised filtration, managing runoff as close to its source as possible and ensuring no deterioration in the water environment.

6.94 For clarity, the relevant policies in this regard are as follows:

- EBC Policy DM3 (Adaptation to climate change), DM5 (Managing flood risk) and Policy DM6 (Sustainable surface water management and watercourse management).
- Adopted WCC Policy CP17 (Flooding, flood risk and the water environment) and Policy DM16 (Site design criteria).

- Emerging WCC Strategic Policy SP3 (Development in the countryside), Strategic Policy CN1 (Managing and adapting to climate change), CN4 (Water efficiency standard in new developments), Strategic Policy NE1 (Protecting and enhancing biodiversity and the natural environment in the district), Policy NE4 (Green and blue infrastructure), Policy NE6 (Flooding, flood risk and the water environment), Policy NE9 (Landscape character), Policy NE17 (Rivers, watercourses and their settings).
- NPPF Chapter 14 (Meeting the challenge of climate change, flooding and coastal change).

6.95 The supporting report confirms that the majority of the Phase 1 and Phase 2 areas are located within Flood Zone 1 with some areas of Flood Zone 2 and 3 located partially within and partially adjacent to the southern part of Phase 1



Existing watercourse

and the northern part of Phase 2. These areas are associated with the watercourse running through the site which is a tributary of Ford Lake.

6.96 The site is also:

- At very low risk of surface water flooding now and according to future climate change projections. Overall, surface water risk is low.
- At low risk of groundwater flooding.
- At low risk of sewer flooding.
- At low risk of flooding from artificial sources.

6.97 Paragraph 175 of the NPPF confirms that:

'The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that could be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).'

6.98 In accordance with this, no built development, access, escape routes, land raising or other vulnerable elements are proposed in Flood Zone 2 or 3 and the sequential test is not required.

6.99 It is noted that the proposed development is classified as 'water compatible' according to the Flood Risk Vulnerability Classification in the PPG.

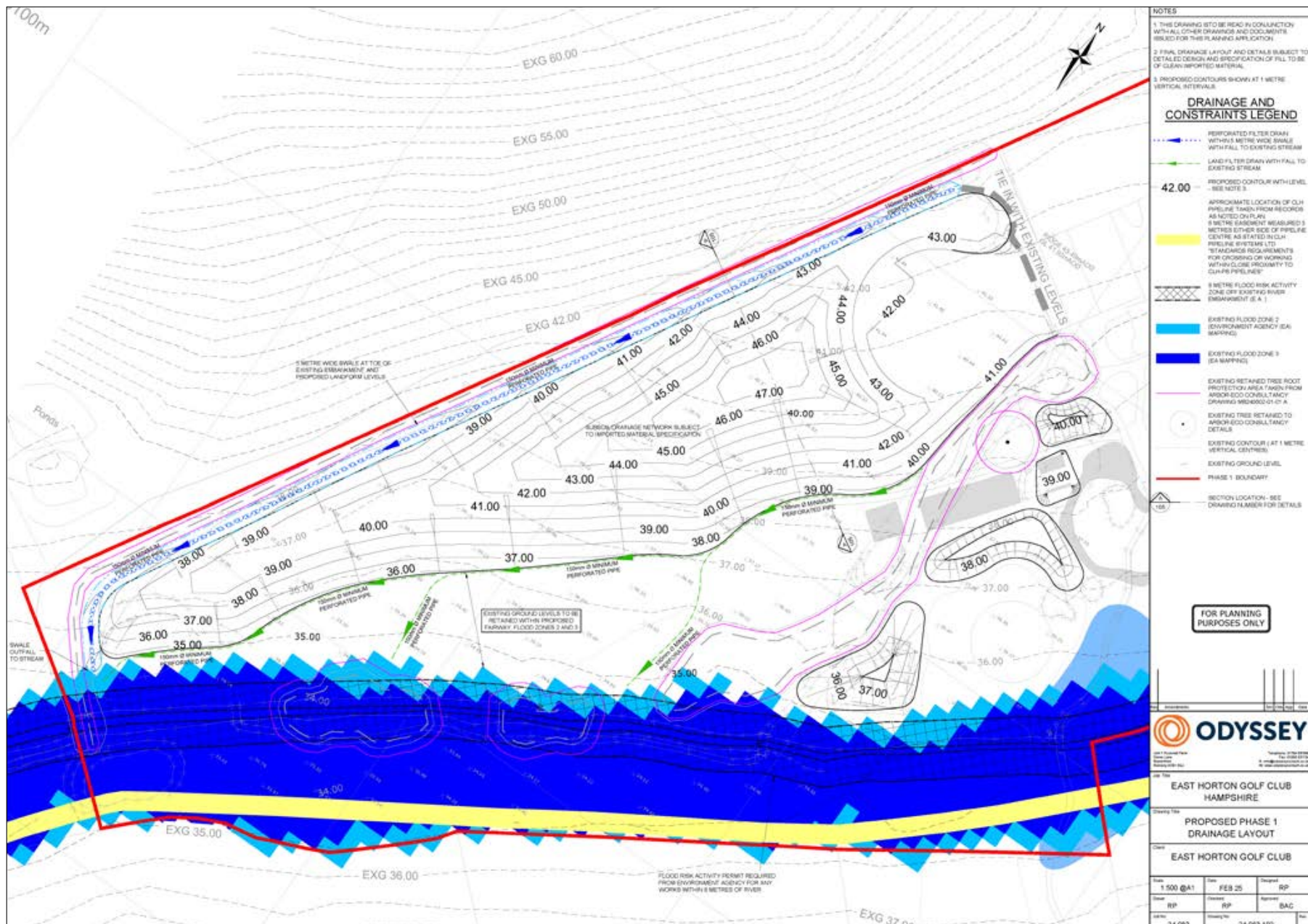
6.100 The proposed development incorporates reprofiling to create swales on both the Phase 1 and Phase 2 areas to reduce waterlogging and improve drainage. The accompanying FRA incorporates a drainage strategy for the proposed development.

6.101 For surface water, infiltration is unlikely to be successful due to the underlying geology. As such, it is proposed that swales would provide attenuation for surface water along the site edges. These would remain outside of Flood Zone 2 and 3 with flows restricted to greenfield runoff rates before being discharged to the adjacent river. This would ensure surface water runoff doesn't increase as a result of the proposals. The Swales would be maintained regularly as part of maintenance for EHGC.

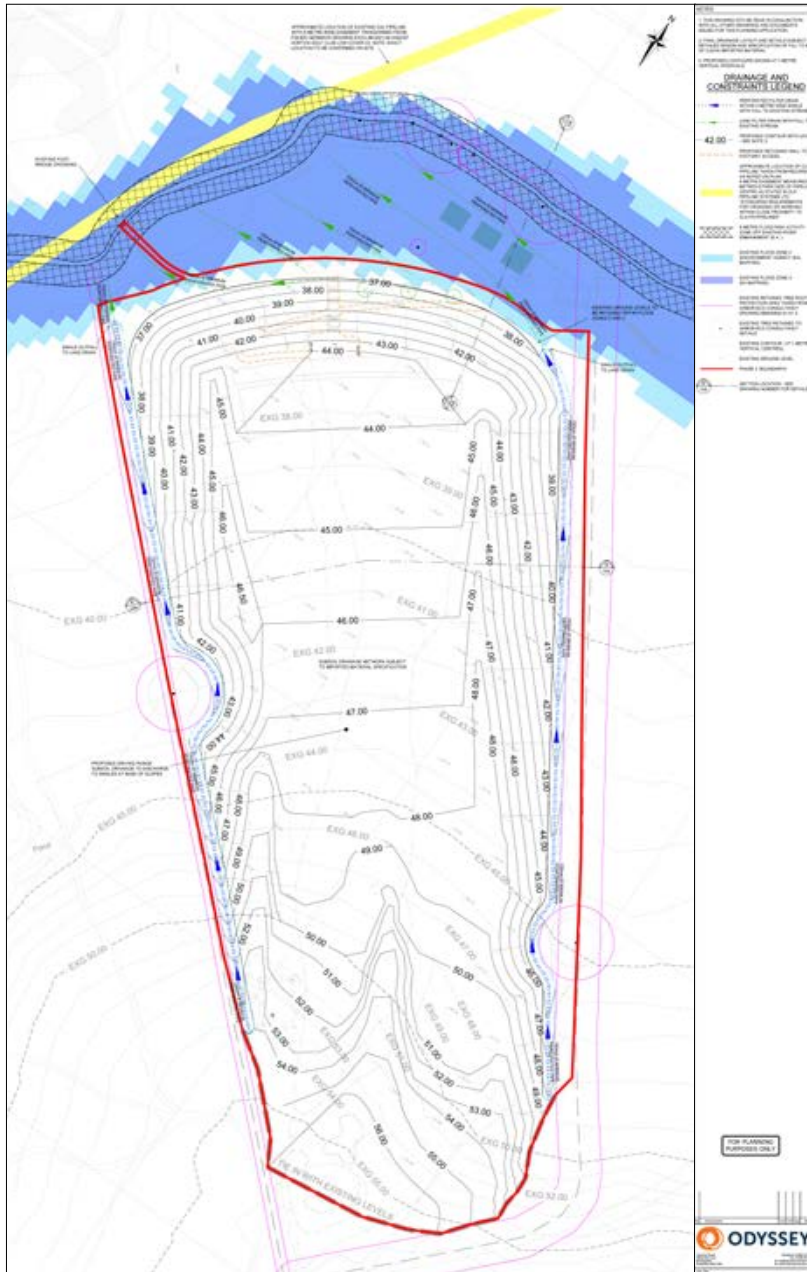
6.102 The Construction and Environmental Management Plan submitted with this application contains proposed measures to control surface water runoff during construction and to manage sediments to avoid siltation of the nearby watercourse.

6.103 There is an existing public foul water sewer to the west of the site flowing by gravity from north to south and serving the residential area to the north west. This would remain unaffected as a result of the proposals.

6.104 Based on the discussion above, this proposal is considered to comply with adopted EBC policy DM3, DM5 and DM6; adopted WCC policy CP17 and DM16; emerging WCC policy SP3, CN1, NE1, NE4, NE6, NE9, NE17; and NPPF chapter 14.



Phase 1 Drainage Layout



Phase 2 Drainage Layout

Access and Highways

6.105 This application is accompanied by a Transport Statement prepared by Nick Culhane Highway Consultant.

6.106 Both authorities have policies that seek to ensure development is acceptable in terms of highway safety, providing appropriate access and parking and having and acceptable impact on the local highway network.

6.107 For clarity, the relevant policies in this regard are as follows:

- EBC Strategic Policy S11 (Transport Infrastructure), Strategic Policy S12 (Strategic footpath, cycle and bridleway links), Policy DM13 (General development criteria (transport)), Policy DM14 (Parking), DM18 (Extension and replacement of non-residential buildings in the countryside) and DM34 (New and enhanced recreation and open space facilities)
- Adopted WCC Policy MTRA4 (Development in the countryside), Policy CP10 (Transport), Policy DM18 (Access and parking) and Policy DM23 (Rural character).
- Emerging WCC Strategic Policy SP2 (Spatial strategy and development principles), Strategic Policy SP3 (Development in the countryside), Strategic Policy T1 (Sustainable and active transport and travel), Policy T2 (Parking for new development), Policy T3 (Enabling Sustainable Travel Modes of Transport and the Design and Layout of Parking for New Developments) and Policy T4 (Access for new developments) and Policy NE14 (Rural character).
- NPPF Chapter 9 (Promoting sustainable transport).

6.108 The existing access from Mortimers Lane will continue to be used and the accompanying report confirms that this is acceptable.

6.109 The proposed works seek to enhance existing facilities and so the trips associated with the operation of EHGC, including use of the golf club, driving range and events are already established in this location. For this reason, the existing car park will continue to be used.

6.110 The accompanying report considers trip generation for the construction phase. During construction, approximately 39,000 sq. m and 166,000 sq. m of material would be brought onto site for the Phase 1 and Phase 2 works respectively. It is anticipated that that considered in isolation would generate approximately 50 loads per day / 100 two-way movements subject to increases or reductions on any one day. It is anticipated that this amounts to an increase of just 2% of the total daily traffic flow on Mortimers Lane. This is considered to be a minor number of trips and the accompanying report concludes that the impact of this on the surrounding highway network would not be significant.

6.111 It is essential to note – as confirmed by the Transport Assessment – that in practice the additional vehicle movements generated by this proposal will be significantly less. Any imported soils will be clean sub-soils arising as excavated construction materials. The Transport Assessment identifies several current planning approvals and construction sites which are likely to act as donor sites for this material. These sites are already

generating the soils and thereby the associated vehicle movements, as those materials have to be disposed-of offsite. By introducing the application site as a receptor for the material/ vehicle trips, the proposal actually reduces traffic within the highway network by shortening the travel distances to and from disposal sites.

6.112 Vehicles moving this material to site would be operated by a single contractor who would be responsible for management including trackers, arrival and departure times. Vehicle routing would depend on the sourcing of construction material. Construction would take place between the hours of 07:30 and 17:00 Monday to Friday and 08:00 to 13:00 on Saturdays with no deliveries taking place on Sundays or Bank Holidays. Adequate wheel washing facilities would be provided on site.

6.113 Based on the discussion above, this proposal is considered to comply with adopted EBC policy S11, S12, DM13, DM14, DM18 and DM34; adopted WCC policy MTRA4, CP10, DM18 and DM23; emerging WCC policy SP2, SP3, T1, T2, T3, T4 and NE14; and NPPF chapter 9.

Sustainability

6.114 Regarding sustainability, both authorities have policies which seek to ensure new development is designed to be energy efficient, ensuring the lowest level of carbon emissions and water consumption that is practically viable is achieved. For clarity, the relevant policies in this regard are as follows:

- EBC Policy DM2 (Environmentally sustainable development).
- EBC Environmentally sustainable development SPD.
- Adopted WCC Policy CP11 (Sustainable low and zero carbon built development).
- Emerging WCC Policy CN2 (Energy hierarchy), Policy CN4 (Energy efficiency standards to reduce carbon emissions), Policy CN8 (Embodied carbon),
- NPPF Chapter 14 (Meeting the challenge of climate change, flooding and coastal change).

6.115 The majority of the proposals comprise reprofiling, landscaping and drainage with the only element of built form comprising the proposed driving range building. An inherently sustainable approach to development has been adopted overall with a commitment to energy efficiency for this. Sustainability will be a focus during construction and operation noting that the proposals relate to an established use in this location.

6.116 Sustainability will primarily be applicable to the new driving range building which will be in outline only. As such, the full details of the building are not known at this stage. However, as can be seen by the indicative plans and parameter plans, the driving range will consist of open-fronted bays. There will be no heating and no lighting, with the sole possible exception of a reception building which may form part of the proposals. This approximately 50m2 building will require a small

amount of heating and lighting during operational hours. The entire building will be constructed in accordance with the latest iteration of the Approved Documents including Part L which sets National standards of thermal performance and energy consumption.

6.117 In addition to the building itself:

- The proposal represents sustainable re-use of construction waste materials – clean soils arising from construction excavation. Such re-use is significantly preferable to its disposal at landfill or other sites where no benefit is gained from the naturally-occurring material.
- The proposal enhances the setting and environment, introducing several new natural features.
- The proposal is designed to improve water quality and naturalised filtration of surface water discharging to the existing watercourse;

6.118 The proposal will achieve a very significant Biodiversity Net Gain in excess of the mandatory 10%.

6.119 Based on the discussion above, this proposal is considered to comply with adopted EBC policy DM2; the EBC Environmentally sustainable development SPD; adopted WCC policy CP11; emerging WCC policy CN2, CN4 and CN8; and NPPF chapter 14.

Ground Conditions, Noise and Vibration

6.120 This application is accompanied by the following documents:

- Desk Study prepared by Ground & Water.
- Construction Noise and Vibration Assessment prepared by 24 Acoustics.

6.121 Both authorities have policies that seek to ensure ground contamination is addressed and pollution from a range of sources does not cause adverse impacts.

6.122 For clarity, the relevant policies in this regard are as follows:

- EBC Policy SM8 (Pollution).
- Adopted WCC Policy DM19 (Pollution) and Policy DM21 (Contaminated Land).
- Emerging WCC Policy D7 (Development standards) and Policy D8 (Contaminated Land).
- NPPF Chapter 15 (Conserving and enhancing the natural environment).

6.123 These documents recommend that an intrusive ground investigation is undertaken to evaluate the risk of contaminants in soils. They note:

- A moderate risk for aggressive ground conditions that may affect water supply pipes.
- Further testing for groundwater if results show

elevated concentrations of contaminants.

- A moderate risk from ground gases due to nearby landfills and backfilled ponds.
- Screening of soils for vapours.

6.124 It is proposed that several control measures are put in place to ensure that sediment arising from any on-site construction activities, are suitably managed and contained on-site, preventing matter from entering the existing watercourse. These control measures are shown on the submitted sediment control plan drawings.

6.125 All sediment control measures are to be installed outside of 8 metre flood risk activity zone as stipulated by the Environment Agency (EA). The proposals include the implementation of cut off ditches, to be installed around the base perimeter of proposed earthworks. A series of temporary check dams will also be installed sequentially along the cut-off ditches to reduce flow and act as silt barrier by capturing any sediment arising from on-site earthwork activity.

6.126 Further sediment control and mitigation measures include the installation of temporary straw bales and temporary stilling basin to be installed prior to any discharge points which will be checked and replaced / cleaned as required. In addition to this, the location of required wheel washing facilities will be carefully considered and mitigation measures will be put into place to ensure that any matter arising from wheel washing

activities is controlled and prevented from entering the existing watercourse.'

6.127 Regarding noise, the accompanying report confirms that noise levels from construction works will remain below the target criterion and will therefore, be acceptable. It is also anticipated that the risk of adverse impacts from vibration is very low.

6.128 Based on the discussion above, this proposal is considered to comply with adopted EBC policy SM8; adopted WCC policy DM19 and DM21; emerging WCC policy D7 and D8; and NPPF chapter 15.

Environmental Impact Assessment (EIA)

6.129 The determination for whether EIA is required rests in the consideration of whether the development is:

- Schedule 1 development – in which case EIA is necessary, or
- Schedule 2 development – in which case EIA is necessary only if the development is likely to have significant environmental effects. Guidance on assessing whether a development would have significant environmental effects is contained in Schedule 3 to the Regulations.

6.130 The proposed development does not meet any of the categories of development in Schedule 1 of the Regulations for which EIA is mandatory.

6.131 The proposed development does not seek to provide a new golf course. Rather, it is for modifications to an existing golf course. There is no change of use, change in area or increased intensity that could be considered the 'provision' of a golf course and the proposals are very much ancillary to the existing operation at EHGC.

6.132 The provision of golf courses would fall under category 12 (f) of Schedule 2 and are defined as a '*tourism and leisure*' use under sub category '*golf courses and associated development*'. The threshold for this category is a site area of 1ha. In addition to the foregoing, whilst the site area of 13.67ha exceeds this threshold, the proposals, by their very nature, are not considered to give rise to significant environmental impacts as demonstrated in this planning statement.

6.133 The PPG confirms that '*when screening Schedule 2 projects, the local planning authority must take account of the selection criteria in Schedule 3 of the 2017 Regulations. Not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way*' (Paragraph: 018 Reference ID: 4-018-20170728 Revision date: 28 07 2017).

6.134 An assessment is made below of the proposed development relative to the criteria set out in Schedule 3, considering the assessment of technical matters earlier in this report.

Characteristics of Development and Location of Development

6.135 The application site forms part of EHGC, a wider golf course which has been long established on this site since 1992 and which remains operational as a golf course and event venue.

6.136 The proposed works sought in full under Phase 1 and 2, as described in full in section 2 of this statement, will enhance an existing golf course and are entirely appropriate on this site.

6.137 The full element relates to reprofiling of parts of the course, the reorganisation of tee boxes, fairways and greens and the provision of associated landscaping and drainage infrastructure.

6.138 The proposals will also enhance the facilities available for events which already take place on site, particularly through the provision of enhanced garden spaces on land that is currently associated with the driving range.

6.139 The only additional building proposed is the new driving range which is applied for in outline. This will replace the existing driving range which, as discussed in further detail above, is extremely under-utilised, even in peak summer months. The existing driving range will close as a result of this proposal.

6.140 The proposed works are ancillary and essential to the use of the land as a golf course and represent the minimum quantum of development required for the operation of the site.

6.141 The proposed driving range, sought in outline, will be constructed following the closure of the existing and will therefore, replace and deliver an enhanced version of a facility which is already available on site. The height and footprint parameters specified for this combined with the adoption of a sensitive design approach, in addition to the screening afforded by mature trees and landscaping on the wider site would ensure that the relationship with the surrounding landscape would be maintained, bearing in mind that there is already a long established relationship between this and the existing golf course.

6.142 The accompanying LVIA demonstrates that the proposed development is acceptable in landscape and visual terms as set out in full detail above.

6.143 The site is well screened by mature trees and vegetation and this would be retained where possible and enhanced overall. Drainage will also be significantly enhanced due to the proposed drainage measures including provision of swales on both phases.

6.144 No works are proposed within areas designated as Flood Zone 2 or 3. All areas within these flood risk zones will remain unchanged by this proposal.

6.145 To summarise, this proposal is not considered to give rise to any adverse impacts on wetlands / riparian areas / river mouths; coastal zones / the marine environment; mountain and forest areas;

nature reserves / parks; European sites; areas which have failed to meet environmental quality standards; densely populated areas; or landscapes and sites of historic, cultural or archaeological significance.

6.146 Having regard to the characteristics of development, this proposal is considered to be of an appropriate size in relation to its context and surrounding pattern of development. As there is an existing golf course on site and the nature of the proposed works which are entirely appropriate for such a location, the proposal would not, in cumulation with other existing / approved development, give rise to significant environmental effects; excessive use of natural resources; excessive waste; pollution or other nuisances; risk of major accidents or disasters; or risks to human health.

Types and Characteristics of the potential impact

6.147 In considering the characteristics of the proposed development and its location, it can be concluded that the proposal represents an appropriate scale of development, which is acceptable for this location.

6.148 The works require the importation of soil onto the site however this can be managed appropriately via a Construction Environment Management Plan with details provided in the transport section above and in the accompanying Transport Statement. As part of this, measures will be implemented to ensure no pollution occurs during construction. If necessary, the Council

could impose a condition to secure further details relating to this prior to commencement of development.

6.149 In transport terms, the proposal is not considered to lead to significant transport effects above that of the existing golf course. The proposal would simply enhance existing uses and facilities at EHGC and this is not considered likely to have a significant impact with minimal increases in vehicle movements at the operational stage. Access and parking will remain as existing.

6.150 The relocation of the 1st tee boxes and fairway will reduce footfall within the adjacent Durley Copse SINC / Ancient Woodland. Moving the fairway further away from this will reduce the number of golf balls entering the ancient woodland and subsequent footfall to retrieve these. The provision of replacement woodland planting will reinforce the overall woodland network of the site.

6.151 Appropriate ecology surveys have been undertaken and demonstrate that impacts can be avoided for hedgehogs, reptiles, foraging and commuting bats and breeding birds with the implementation of mitigation and precautionary avoidance measures. For badgers and great crested newts, development and mitigation licenses to be in place prior to commencement.

6.152 The proposals have been designed to ensure a sensitive relationship with adjacent Listed Buildings and their setting with the reprofiling on Phase 1 resulting in an enhancement by providing

additional screening for the adjacent landfill site. Regarding archaeology, if necessary, the Council could impose a condition to secure further details to require further investigation prior to commencement of development.

6.153 Furthermore, no other environmental impacts are likely in respect of other technical disciplines.

6.154 Overall, it is not considered that the proposed development would be likely to generate significant environmental effects when considering:

- The magnitude and spatial extent of the impact;
- The nature (including transboundary) of the impact;
- The intensity and complexity, and probability of the impact;
- The onset, duration and frequency of the impact; and
- The cumulation of the impact with other existing / approved development.

Conclusion on EIA

6.155 Having regard to the above detailed consideration of the relevant criteria and thresholds set out and explained within the Regulations and the Planning Policy Guidance, it is evident that the proposal does not constitute Schedule 1 development. Nor does the proposal

fall within the strict definitions of Schedule 2 development although the site area does exceed the Schedule 2 thresholds for the provision of golf courses and other associated development.

6.156 Based on the characteristics of development, the location of development and the characteristics of the potential impact as discussed above, we conclude that the proposal is not EIA development. The proposed development seeks to enhance facilities associated with an existing use which has an established and acceptable impact and is not considered to give rise to further significant impacts.



The Planning Balance



7.1 On the basis of the analysis set out in the above section, it is considered that the proposed development comprises sustainable development in the context of the policies set out within the NPPF and accords with the Development Plan. In summary, the proposal is considered:

- Environmentally Sustainable – the site comprises a longstanding golf course and the proposals seek to enhance facilities associated with this, delivering wider benefits associated with landscaping, biodiversity, drainage and nature conservation.
- Economically Sustainable – the proposal enhances facilities at EHGC, responding to increasing demand for golf and event facilities. It will help to ensure the successful operation of EHGC which contributes to the local economy and is a significant local employer.
- Socially Sustainable – the proposal will help meet a need for golf course accommodation, enhancing the provision of sports facilities within the local area to the benefit of local people.

7.2 The proposed use is acceptable in principle in this location and the technical assessment work undertaken in support of the application confirms that there are no other material considerations which suggest any harm would outweigh the benefits of the proposed development. The benefits are extensive and weigh heavily in favour of the scheme.

7.3 The proposal comprises a well-designed and high-quality scheme, which is entirely appropriate to its context in terms of urban form and materials. The proposals are of a scale that responds to the surrounding area and respects the amenity of neighbouring properties.

7.4 On this basis, and taking into account the significant benefits arising from the scheme, it is respectfully considered that planning permission should be granted.

Credentials for James Edwards, specialist golf architect

Appendix 1

EDI were invited by EHGC and tasked with improving the overall flow of the start and finish of the course and the connection to the practice facilities from the Clubhouse. The existing range facility in conjunction with the 1st hole have always been underperforming in undesirable locations that mean the experience is falling short of expectation. Our idea was to move the 1st fairway away from the dark, small gap between the ancient woodland and the stream which is currently the toughest tee shot on the course and move it wholesale to the other side where there is space, light and air and the ability to grow high level turfgrass. The green itself would be played to from the fairway across the water instead of alongside which adds an element of strategy and excitement for all visiting golfers. In conjunction with this, formal gardens could be developed on the old range area for member exercise, health and wellbeing as well as garden for for weddings and larger groups. At the Clubhouse end, development of new tees would be realigned for this hole-centre-line change which would give an opportunity to redevelop the 18th green and approach in its entirety and new practice facility and patio adjacent to the bar areas.

EDI are an international golf course architectural firm (since 2009) and member of the European Institute of Golf Course Architects (since 2001). We are currently working on 50 projects across 10 countries of all types from new build to course renovation to sustainability and drainage.

- James Edwards



For further information contact

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Our Values

- ✓ We believe in happiness
- ✓ We do the right thing
- ✓ We make it personal
- ✓ We make a difference