

FAO Sam Dumbrell
Planning Department
Hampshire County Council

Electronic Copy Only

Date: 15th of September 2025

Dear Sam,

RE: East Horton Golf Centre – Planning Application References 25/01229/HCS & CS/25/99539

This letter provides responses to your letter of the 12th of September reference EA116.

1. Need/ Compliance with Waste Planning Policies

The consultation response references the criteria within the Environment Agency RGN:13 for assessing Recovery vs Waste. This guidance states under Section (3) Waste Recovery that *'Waste Recovery is about using waste to use replace other non-waste materials to achieve a beneficial outcome in an environmentally sound manner. The clearest indicator of waste recovery is when it can be shown that the waste used is a suitable replacement for non-waste materials that would otherwise have to be used to achieve the end benefit.'*

Considering each of the criteria in turn:

- *is the scheme genuine and with clear benefits?;*

There can be no reasonable question that the scheme is genuine and that clear benefits would arise. This position is set out clearly within the Planning Statement and within the application taken as a whole. The proposal is for the construction of a new high-quality Driving Range to replace the existing poor-quality one onsite, which will be removed. A Driving Range is an integral part of any Golf Club and, for most Golf Clubs, is the highest revenue generator. In many instances a driving range is an attraction in its own right with many Driving Ranges operating in isolation from a wider golf course. Therefore, the desirability of creating a new Driving Range on an existing well-established golf course self-evidently delivers clear benefits.

The purpose of the application is to create a new Driving Range. Waste recovery operations, if applicable, arise only as a function of this purpose.

- *are the proposed materials fit for the intended purpose?;*

The proposed materials (inert soils) are fit for the intended purpose. The table at Appendix 2 to RGN:13 identifies waste code 17 05 04 'soil and stones' as being appropriate for:

B. Construction of noise bunds, screening bunds, flood defence bunds, containment bunds, golf courses. Landscaping associated with construction work. Restoration of mineral workings. General fill material.

- *whether the proposed volumes/tonnage of 'material' are the minimum amount required to deliver the scheme;*

The proposal is design-led. The proposed Driving Range has been designed by an internationally-renowned golf course and landscape architect. Key physical design requirements including:

- A gentle upward-gradient, to aid visibility of the entire range and target greens
- Driving range on a single consistent plane without dips or undulation

- Naturalised physical enclosure on edges
- Integration with the surrounding landscape
- Maximum possible width
- Physical features at the far end of the driving range to serve as target features

The calculated volume/ tonnage of soils that would be required to construct the proposal is simply the product of the design. It is therefore the minimum amount required to deliver the proposed Driving Range.

- *would the proposal be carried out with non-waste (status to be proven) material if waste material(s) was/were not available; and*

As set out clearly within the Planning Statement and within the application taken as a whole, the proposal is for the construction of a new high-quality Driving Range to replace the existing poor-quality one onsite. A Driving Range is an integral part of any Golf Club and, for most Golf Clubs, is the highest revenue generator. This is clearly a significant undertaking and investment for the existing Golf Club which will necessitate disruption and closures to courses for various periods. However, the investment including acceptance of disruption is worthwhile given the anticipated benefits of constructing a new high-quality driving range in a suitable location within the site.

For these reasons the proposal would also be worthwhile if the necessary investment included the purchase and importation of virgin non-waste materials.

The response to this question is therefore 'yes' – the proposal would be carried out with non-waste material if waste materials were not available.

- *would the scheme be completed to an appropriate standard?*

We do not consider there can be any genuine question over whether the proposal would be completed to an appropriate standard. The application is supported by comprehensive proposals for the construction of a high-quality Driving Range including landscape planting proposals. The proposal would achieve a Biodiversity Net Gain far in excess of the 10% required.

The entire purpose of the proposal is to improve the quality of the existing Golf Club and facilities on offer, so completion to an appropriate standard is integral to the proposal.

The proposal clearly meets all the tests set out within RGN:13 to be considered as a recovery operation. As the letter dated 12th of September repeatedly references, there are numerous recent examples within Hampshire where similar proposals on Golf Courses have been approved and treated in the same way.

HMWP Policy

We consider the key Policy within the Hampshire Mineral & Waste Plan 2013 (HMWP) relating to the proposal is **Policy 30: Construction, Excavation and Demolition Wastes**. Paragraph 6.211 states in relation to Policy 30 that:

"the objective in Hampshire is to reuse, recycle and recover as much as possible of the estimated 2.35 million tonnes (mt) of construction, demolition and excavation (CDE) waste that is generated in Hampshire each year. CDE waste is mostly made up of inert material such as concrete, rubble or soils."

This paragraph should also be read in relation to Paragraph 6.142 of the HMWP, which provides context for Policy 25, which states:

"Inert waste arisings are mostly generated from construction, demolition and excavation activities and generally consist of concrete, brick, glass, soils and clays. Most inert waste is recycled or recovered and the vast majority, if not all, of inert waste that is disposed to land in Hampshire is for beneficial uses and is not considered landfill."

Policy 30 states:

"Where there is a beneficial outcome from the use of inert construction, demolition and excavation waste in developments, such as the restoration of mineral workings, landfill engineering, civil engineering and other infrastructure

projects, the use will be supported provided that as far as reasonably practicable all materials capable of producing high quality recycled aggregates have been removed for recycling."

The 'beneficial use' is demonstrated above and more fully by the application taken as a whole. The proposal is clearly supported by Policy 30 and should be given the highest level of support given it potentially allows the recovery of waste materials.

We note that Eastleigh Borough Council applied a 'prior mineral extraction' condition to a related Planning Permission and the applicants agree the application of the same condition to this proposal which addresses the latter point of Policy 30.

The proposal falls within Paragraph b. of **Policy 25 Sustainable Waste Management** of the HMWP, which requires that

'all Waste development should...

- a. encourage waste to be managed at the highest achievable level within the waste hierarchy; and*
- b. reduce the amount of residual waste currently sent to landfill; and*
- c. be located near to the sources of waste, or markets for its use; and/or*
- d. maximise opportunities to share infrastructure at appropriate existing mineral or waste sites.*

The proposal would ensure that waste is managed at a high level within the waste hierarchy by putting materials to a beneficial reuse and thereby avoiding waste sent to landfill.

As the Transport Statement supporting the application sets out, the application site is located near to potential sources of waste.

Policy 29: Locations and sites for waste management is also cited within the Policy consultation response:

The proposal falls within point (3) of the Policy:

3. Development in other locations will be supported where it is demonstrated that:

- a. the site has good transport connections to sources of and/or markets for the type of waste being managed; and*
- b. a special need for that location and the suitability of the site can be justified.*

In relation to (a) as the Transport Statement supporting the application sets out, the application site is located near to potential sources of waste and more generally is suitable in terms of accessibility.

In relation to (b), Golf Courses are generally identified as likely suitable sites for recovery of inert soils. It is self-evident that golf courses will rarely meet the criteria set out in Policy 30 1 (i) to (iii) (Urban areas, Strategic Road corridors, Areas of new major development). For the application site, the 'special need' for the location is set by the fact that a golf course already exists at the location and has a need for the types of material considered. That the site is 'suitable in terms of accessibility' is demonstrated by the Transport Statement.

The letter dated 12th of September states, in conclusion:

In order to achieve compliance with Policies 25, 29 and 30 this further information will need to address the issues of sustainability, location and beneficial outcomes. Therefore, the ES should be updated to include an assessment against the above policy related information (in conjunction with the submitted Planning Statement, which should also be updated), to include the following also.

a) All of the material brought onto the site will be a non-waste; and

b) What mechanisms will be in place to ensure that all of the material brought onto the site will be a non-waste.

This will be secured through the Material Management Plan which we assume would be referenced as a pre-commencement condition, and could also be secured by Planning Condition if appropriate.

Therefore, the amount of 'material' to be imported to complete the development being 166,000m3 of clean, inert sub-soils must demonstrate that:

- *the proposed materials are fit for the intended purpose; This is demonstrated above.*
- *whether the proposed volumes of 'material' are the minimum amount required to deliver the scheme; This is demonstrated above. and*
- *would the proposal be carried out with non-waste (status to be proven) material if waste material(s) was/were not available? This is demonstrated above.*

2. Landscape and Visual

In summary, the County's Landscape Advisor has suggested that the proposed heights could be reduced.

We would refer to the application taken as a whole and our responses set out in Part 1 (Policy) above. In particular, the proposal is design-led. The proposed Driving Range has been designed by an internationally renowned golf course and landscape architect to achieve a high-quality playing environment. We have set out above that the volume/ tonnage of importation is a product of the proposed design but, as such, is effectively the minimum volume/ tonnage required to successfully achieve the desired outcomes.

In particular, the Landscape comments highlight a single viewpoint (from Pembers Drive), stating:

As a result of the rise of levels by more than 5m, the back of the proposed driving range building, with a very long facade, will be seen from outside the site, principally from Viewpoint 19, and the residents of Pembers Hill Drive.

We do not consider that the proposed reductions would have any benefit. The comments state in terms of perceived benefits that:

It is questioned if lowering the levels of fill by approx. 2-3m would be beneficial to reducing the impact of the building and landform on these permanent minor/negligible adverse effects and make the landscape on the downslope much more manageable. This amendment ought not have an impact on the users experience of the improved driving range.

However:

- As the Landscape and Visual Impact Assessment accompanying the application clearly demonstrates, the sole external view is at a distance of greater than 500 linear metres, and looking 'downwards.' The view of the mounding and proposed building is framed by the mature treeline at the far South-East of the proposed Driving Range with both the base and maximum height of the proposed trees significantly higher than the proposed mounding or building. Therefore, neither reduction nor increase in the height of mounding and building could be 'read' against that backdrop, particularly with the distances involved (greater than 500m, 960m to the treeline).
- The applicants and owners/ operators of the golf course are content with the ability to establish and thereafter maintain landscape planting on a bank of 1:3.5 which is no steeper than other banks around the existing golf course.
- We disagree strongly with the final sentence that the amendment ought not to have an impact. As clearly demonstrated the proposal has been carefully designed to achieve specific outcomes and the suggested amendment would begin to erode the benefits of the design – in particular by making the driving range steeper. As set out above, the perceived landscape benefits of the change would not be perceptible onsite. We also do not consider that the amendment would improve the 'minor/ negligible' outcome. A 'minor/ negligible' impact upon a single long-distance viewpoint (which is an exceptionally narrow, location-specific viewpoint at a gap in a mature treeline) is far outweighed by the benefits of the proposed design when taken as a whole.

3. Ecology

No comments to make at this time.

4. Water Environment

The applicant's preference would be for pre-commencement conditions to be applied as suggested.

5. Traffic

We consider this is fully addressed in the submitted Transport Statement including the likely locations of donor sites for imported materials and the general availability of suitable materials within the locality.

6. Climate Change

Sustainability is addressed within the Planning Statement submitted with the application. The applicant does not intend to submit an additional statement at this stage. It can clearly be seen from the information set out within this letter and from the application taken as a whole that the proposal is sustainable development which complies with the requirements of National and Local policy. The specific elements listed within **Policy 2: Climate change - mitigation and adaptation** of the HMWP would be addressed within a CEMP to be prepared and approved prior to commencement of development.

Please do not hesitate to contact us should you have any queries or wish to discuss.

Yours sincerely,

Lloyd Exley | Director