

# 1MCo4 Main Works - Contract Lot S2

## Materials Management Plan - Ruislip Golf Course S2

MDL:

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# 1 Introduction

## 1.1 Background

1.1.1 The High-Speed Rail (London-West Midlands) Act 2017 conferred the necessary powers required to construct the HS2 railway. The works required to construct the HS2 railway will result in the loss of land from the southern part of Ruislip Golf Course. There also needs to be a safety margin between the golf course and the railway. It was agreed that HS2 Ltd would prepare and submit a planning application under the Town and Country Planning Act 1990 to reconfigure the golf course.

1.1.2 The design for the golf course aims to create an interesting and challenging course and deal with drainage and flood issues. The design results in cut and fill across the site. In general levels rise and there is a deficit of 48,000m<sup>3</sup> of material to achieve the design ambition. It is proposed to transfer natural excavated material from the construction of the adjacent West Ruislip Portal to make up the deficit.

1.1.3 During preapplication consultations with London Borough of Hillingdon (LBH) it was agreed that an interim materials management plan (MMP) would be included with the planning application (this document).

1.1.4 This interim MMP has been developed in accordance with the CL:AIRE (2011) The Definition of Waste: Development Industry Code of Practice (DoWCoP) and is based on the contents required by the template provided by the CL:AIRE Materials Management Plan form. The template describes the information required to complete an MMP which is typically done once detailed information is available and before excavation and placement begins. It requires specific information on many aspects including the parties involved, final quantities of materials and details of materials movement and tracking for example. This interim MMP summarises information available at the Scheme Design stage prepared for the planning application. There will be updated information available during the detailed design stage during 2020.

1.1.5 This interim MMP will be updated after detailed design and before construction starts. While some details may be updated or altered in the later MMP, the principles described in this MMP, which are also those that underpin the use of the DoWCoP in these circumstances, will not change.

1.1.6 This MMP relates to the both the excavation and reuse of material at Ruislip Golf Course (cut and fill) and the direct transfer of natural excavated material from West Ruislip Portal. The structure of this MMP is set out to match that of the CL:AIRE MMP template although it is formatted in accordance with HS2 standards.

## 1.2 Reports and information informing the MMP

1.2.1 The following reports have been used to inform this MMP and are referenced later in relevant sections and provided in the appendices.

- SCSJV (2018) Ruislip Golf Course Environment Agency Meeting Minutes (and other correspondence included in Appendix A);
- SCSJV (2019) Design Statement - Ruislip Golf Course S2, Document no 1MCo4-SCJ\_SDH-EV-STA-SS05\_SL07-000001;
- SCSJV (2019) Geoenvironmental Desktop Study- Ruislip Golf Course S2, Document no 1MCo4-SCJ-EV-REP-SS05\_SL07-0000006;
- SCSJV (2020) Geoenvironmental report – West Ruislip Portal S2, Document no 1MCo4-SCJ-GT-REP-SS05\_SL07-000005;
- Fugro (2018) Draft factual report South Package (B), Document number 1G107-FES-GT-REP-000-000009;
- SCSJV (2019) Soil Resource Plan – West Ruislip Compound and Retained Embankment, Document no.: 1MCo4-SCJ-CL-PLN-SS05\_SL07-000003; and,
- SCSJV (2019) Waste and Excavated Materials Management Procedure S1 and S2, 1MCo3-SCJ-EV-PRO-S001-000007.

## 1.3 MMP scenario

1.3.1 *The scenario(s) to which this MMP relates, as described in the Table 1 of the DoWCoP are as follows:*

- Scenario 4 i.e. a combination of
  - Scenario 1. Reuse on site of origin, for cut and fill works within the boundary of the golf course based on the updated design for the golf course; and
  - Scenario 2. Direct transfer of clean naturally occurring materials from Ruislip portal excavation to the adjacent golf course to make up the deficit identified by the design of the golf course.

## 1.4 Preparation of MMP

1.4.1 *The organisation and name of person preparing this MMP (full address and contact details):*

- Adam Shelton / Chris Barrett
- Ove Arup and Partners Limited, 13 Fitzroy Street, London, W1T 4BQ
- +44 (0)20 7755 3973 / +44 (0)20 7755 2447

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- [adam.shelton@arup.com](mailto:adam.shelton@arup.com) / [chris.barrett@arup.com](mailto:chris.barrett@arup.com)

## 1.5 Document control

Date issued	21/10/2019 Interim issue to support planning application
Revision date	
Summary of revision 1	
Summary of revision 2	

## 2 The Site and development

### 2.1 Details

2.1.1 *The names of the two sites are:*

- Reuse and receiving site name: **Ruislip Golf Course**
- Donor site name: **West Ruislip Portal, HS2 Lot S2**

### 2.2 Landowners

2.2.1 *Name of landowners (Golf course)*

- Ruislip Golf Course, Ickenham Rd, Ruislip HA4 7DQ

2.2.2 *Name of landowners (Portal):*

- Network Rail, 1 Eversholt Street, London, NW1 2DN

### 2.3 Summary and objectives

2.3.1 *Provide a brief description of the planned project and how excavated materials are to be reused.*

2.3.2 The HS2 railway will result in the loss of land from the southern part of Ruislip Golf Course. This will reduce the playable area of the existing course, impacting some of its holes, practice nets, putting greens and the driving range. The course therefore requires a new layout to secure its long-term future. HS2 Ltd signed The Hillingdon Agreement with the London Borough of Hillingdon in August 2017, in which it was agreed HS2 Ltd would prepare and submit a planning application under the Town and Country Planning Act 1990 to reconfigure the golf course.

2.3.3 The description of the proposed development is as follows:

- Remodelling of Ruislip Golf Course, incorporating: reconfiguration of 18 existing hole course into a 9 hole course, short game putting and practice area and six hole academy course, provision of a single storey rifle range, demolition of existing covered driving bays and construction of replacement 20 bay driving range, including associated floodlights and safety netting, landscaping works, realignment and enhancement of public footpath U81, excavation of a new channel for the Ickenham Stream incorporating new ponds, and other associated works.
- The new design of the golf course aims to create an interesting and challenging course while also dealing with drainage and flood issues. This results in some cut and fill across the site. In general ground levels are required to rise and there will be a deficit of 48,000m<sup>3</sup> of material to achieve the design ambition.
- As part of the HS2 works, the West Ruislip Portal will be built south of the existing

Ruislip Golf Course. The current design of the portal is approximately 31.3m to 22.6m wide, approximately 160m long and up to 20m deep (width and depth tapering from east to west). This will generate a considerable quantity of excavated material, mostly natural ground.

- Natural soils (only) generated from the portal excavation, will be used to remodel the golf course. Material will be stockpiled and managed before being used for re-profiling across the golf course.

## 2.4 General plans and schematics

### 2.4.1 Location plan reference:

- A site plan for the portal (donor site) is provided as Figure 1.
- A site plan for the golf course (reuse and receiving site) is provided as Figure 2.

### 2.4.2 Schematic plan reference:

- Various plans showing material movements and haul routes are provided in Appendix C. This shows where different materials are to be excavated from (cut and fill), haulage routes, stockpile locations, and where materials are to be reused.

## 3 Parties involved and consultation

### 3.1.1 *Main earthworks contractor (Golf course):*

- Skanska, Costain, Strabag (SCS), Victoria House, Third floor, 37-63 Southampton Row, London, WC1B 4DA

### 3.1.2 *Main earthworks contractor (Portal):*

- As above

### 3.1.3 *Treatment contractor:*

- Not applicable. There is currently no plan or expected requirement to treat materials during the cut and fill or the placement of excavated materials from the portal on the golf course. Materials from the portal will be uncontaminated and naturally occurring and no treatment is needed to make these suitable for use. Depending on the time of year and the moisture content of the excavated materials there may be requirement to dry some soils.

### 3.1.4 *Where wastes and materials are to be transported between sites, provide details of the transport contractor:*

- Skanska, Costain, Strabag (SCS), Victoria House, Third floor, 37-63 Southampton Row, London, WC1B 4DA

### 3.1.5 *Provide Local Authority contact details (full address and named contacts) where excavated materials are to be reused:*

- Ian Thynne
- London Borough of Hillingdon (LBH), Civic Centre, High Street, Uxbridge, Middlesex UB8 1UWa
- 01895 558 326,
- [ithynne@hillingdon.gov.uk](mailto:ithynne@hillingdon.gov.uk)

### 3.1.6 *Environment Agency contact details:*

- Lucy Gallagher/ Matthew Wales
- Environment Agency
- 020 3025 0799
- [lucy.gallagher@environment-agency.gov.uk](mailto:lucy.gallagher@environment-agency.gov.uk)
- [matthew.wales@environment-agency.gov.uk](mailto:matthew.wales@environment-agency.gov.uk)

## 4 Lines of evidence

### 4.1 Suitable for use criteria

4.1.1 *Please describe or provide copies of the required specification(s) for the materials to be reused on each site.*

#### *Golf course (Route A)*

4.1.2 The current assumption is that the material will be placed in accordance with the Specification for Highways Works (SHW Series 600) as Class 4 landscaped fill. The Soil Resource plan (1MCo4-SCJ-CL-PLN-SS05\_SL07-000003) describes the principles for managing topsoil and subsoil including stockpiled management and placement.

4.1.3 The geoenvironmental quality of the existing conditions on the golf course has been assessed in the HS2 (2019) Geoenvironmental Desktop Study Ruislip Golf Course S2 (1MCo4-SCJ-EV-REP-SS05\_SL07-000006). A summary is provided below.

4.1.4 The site remained undeveloped agricultural land until it became a golf course circa 1936 with no evidence of development or significant potentially contaminative land uses. Potential sources of contamination may be associated with an agricultural land-use including minor burial of materials and Made Ground to raise levels. The available ground investigation information did not identify any significant sources of contamination on the site with Made Ground being limited both in depth and extent. Ground investigation commissioned by HS2 was undertaken as part of South Package B in 2018. This included 29 samples collected from the golf course. The concentrations of chemical contaminants in the soil were all low and below generic assessment criteria (GAC). The report provided recommendations for supplemental investigation which will be undertaken in the detailed design phase.

4.1.5 Although the contaminated potential was identified as generally low those works will be progressed through DoWCoP 'Route A' i.e. where contamination is suspected or known to be present as further investigation is proposed. The results of the investigation will be assessed. A remediation or risk management strategy will be developed based on the results which will inform the earthworks specification. It is considered unlikely that significant contamination will be identified on the golf course.

4.1.6 The suitable for use criteria will be based on both the highways specification (for geotechnical parameters) and the appropriate contamination assessment criteria such as the LQM/CIEH 'Suitable 4 Use Levels' which present soil assessment criteria for an extended range of 89 substances. The preliminary risk assessment concludes that risks to controlled waters as low. The surface soils will be suitable for use for public open space.

4.1.7 A detailed specification for the reuse and placement of soils excavated from within the golf course on the same site has not been produced at this stage (interim MMP) as the design is currently a scheme design. During 2020 the detailed design of the scheme will be developed, further ground investigation is planned, and a detailed specification will be produced. The

specification will be based on Specification for Highways Works series 600 (earthworks). This defines the various types of acceptable and unacceptable materials meeting the requirements of either permitted materials in Table 6/1 of that specification (for acceptable) or classed as unacceptable (U1A, U1B or U2). The specification will be included in the updated MMP produced at the end of the detailed design period.

### *Portal excavation (Route B)*

4.1.8 The current assumption is that the material will be placed in accordance with the Specification for Highways Works (SHW Series 600) as Class 4 landscaped fill. An outline specification for the geotechnical requirements is described in the design statement listed below (section 4.3 and 4.5). The Soil Resource plan (1MCo4-SCJ-CL-PLN-SS05\_SL07-000003) describes the principles for managing topsoil and subsoil including stockpiled management and placement. Only natural soils will be reused on the golf course. During 2020 the detailed design of the scheme will be developed, and a site specific specification produced covering the excavation and placement works.

4.1.9 The geoenvironmental quality will be based on GAC for public open space as described earlier. The soils will be placed in a geologically similar area. The deep aquifer is a source protection zone one, but this is protected by thick layers of London Clay. The geochemistry of the excavated natural soils will be identical to the underlying natural soils as the excavation is very close to the placement area.

4.1.10 The following documents have been produced in relation to the excavation of natural soils from the Ruislip portal.

- SCJV (2019) Design Statement - Ruislip Golf Course S2. Document no 1MCo4-SCJ\_SDH-EV-STA-SS05\_SL07-000001
- SCS JV (2018) Geoenvironmental report – West Ruislip S2. Document no 1MCo4-SCJ-GT-REP-SS05\_SL07-000005

4.1.11 A short summary of the geoenvironmental conditions is provided below.

4.1.12 The geoenvironmental assessment indicates the land was open fields before it was developed as railway land in 1914. The site remains unchanged and is generally open with no significant potentially contaminative site uses shown within the site footprint. The western part of Ruislip Golf Course is located within an inner catchment (zone 1) Source Protection Zone (SPZ) associated with five potable water abstractions located from 88m to the west/north-west of the site.

4.1.13 Ground investigation commissioned by HS2 was undertaken as part of South Package B (SPB) in 2018. Samples were collected from nine exploratory holes within the site boundary. Chemical testing was completed on 29 samples. Leachability analysis was undertaken on 28 samples from nine locations within the site boundary. The data obtained from the ground investigation has not identified any significant contamination and the results are all very low. The results from leachable data for natural soils were very low and recorded below all Water

Quality Standards for all determinands, except for one slightly elevated concentration of selenium. The selenium concentration is typical in these strata and will be representative of natural existing conditions at the site(s). The density of testing provides a good indication of current conditions.

4.1.14 Excavated materials will be tested at a frequency that will be defined in the site-specific sampling plan. This will ensure only suitable materials are used within the receiving site.

### *Documentation from the regulators*

4.1.15 *Relevant documentation from the LA or Environment Agency relating to the excavation and reuse of the materials to demonstrate no objections to the proposals*

4.1.16 Relevant documentation from LBH relating to the excavation and reuse of the materials to demonstrate no objection is included in Appendix A. In short LBH required an interim MMP to be submitted with the planning application. LBH stated that the Environment Agency would then respond to the application and MMP and provide a formal response to LBH.

4.1.17 A meeting was held on 30th August 2018 with representatives from HS2, SCS and the Environment Agency. Meeting minutes are included in Appendix A. During the meeting the principles described in this MMP were agreed with the Environment Agency.

4.1.18 An overview of the scheme was given including a summary of the review of the available data. This is summarised in the SCSJV Design Statement (1MCo4-SCJ\_SDH-EV-STA-SS05\_SL07-000001). The geotechnical properties of the material make it acceptable for use as Class 4 landscape fill under the Specification for Highways Works (SHW Series 600). Treatment of the soils is not expected based on their insitu condition although some management or treatment may be required depending on the weather conditions at the time of excavation, such as to control or reduce moisture content. The geoenvironmental testing from the portal indicates the natural soils are uncontaminated for the proposed end use of the golf course. The application site is within SPZ1 and SPZ2, however, there is no sensitive shallow aquatic environment and the deeper aquifers are protected by a thick layer of London Clay.

4.1.19 The Environment Agency representatives agreed the DoWCoP was the most suitable approach. It was agreed that 'direct transfer of naturally occurring soils' was the most appropriate scenario for soils arising from the portal and that 'Route B' was appropriate for those soils. The Environment Agency requested that the cut and fill on the golf course should be included in the same MMP under the scenario of 'reuse on site of origin'.

4.1.20 *Documentation from any other regulators relating to the excavation and reuse of the materials to demonstrate no objection*

- Not applicable

## 4.2 Certainty of use

4.2.1 The following sections identify what lines of evidence relate to the site where the materials are to be used.

4.2.2 *Planning Permission relating to the site where materials are to be reused:*

- The pre-application planning reference for the proposed redevelopment of Ruislip Golf Course is: 10737/PCR/2018/204.

4.2.3 *Explanation of how the reuse of the excavated material fits with the planning permission for each site:*

- High Speed Rail (London West Midlands) Act 2017 conferred the necessary powers required to construct the HS2 railway (HS2 Hybrid Bill). This will result in the loss of land from the southern part of Ruislip Golf Course and excavation of material within the West Ruislip Portal.
- HS2 Ltd signed the Hillingdon Agreement with the London Borough of Hillingdon in August 2017, in which it was agreed that HS2 Ltd would prepare and submit a planning application under the Town and Country Planning Act 1990 to reconfigure the golf course.

4.2.4 *Explanation if planning permission is not required for the site (if applicable)*

- Not applicable.

### Where contamination is suspected or known to be present (Route A) Golf Course

4.2.5 *Please provide a copy of any Remediation Strategy(ies) that have been agreed with relevant regulators*

- A geoenvironmental desk study (1MCo4-SCJ-EV-REP-SS05\_SL07-000006) has been prepared by Skanska Costain Strabag (SCS JV) on behalf of High Speed Two Ltd. (the applicant), to support the planning application for Ruislip Golf Course, London. The report describes the environmental setting, ground conditions and site history. It presents a conceptual site model and preliminary risk assessment based on the proposed form of development. This included assessment of existing ground investigation where available.
- The risk assessment identified limited plausible contaminant linkages between potential on- and offsite contamination and human health receptors (during both construction and operation) and building materials and services. Most of the potential pollutant linkages were assessed to present a low, very low or negligible risk except for direct contact with soil and dust by construction workers and site visitors during construction and direct contact with soil by maintenance workers during operation which was assessed as a moderate to low risk.
- It includes recommendations for ground investigation, and control and mitigation measures required where to manage risks during the construction stage. This includes health and

safety during construction, a watching brief, and materials management and control during development. The geoenvironmental assessment will be updated following further investigation before development.

### *Where contamination is not suspected (Route B) Portal*

4.2.6 *Please provide a copy of any Design Statement(s) that have been agreed (e.g. with the planning authority or in the case of permitted developments the client).*

- A design statement has been prepared for the portal (1MCo4-SCJ\_SDH-EV-STA-SS05\_SLo7-000001). This includes an assessment of existing data and both a geotechnical and geoenvironmental assessment of the conditions at the site and potential for reuse of materials at the Golf Course.

## **4.3 Quantity of use**

4.3.1 *Please provide a breakdown of the excavated materials for each site and how much will be placed at each site or sub area of each site.*

4.3.2 A selection of drawings that shows the current site layout and topography, proposed topography, general arrangement and isopachyte of the earthworks are included in Appendix B:

- 1MCo4-SCJ-EV-DPL-SS05\_SLo7-241001 Existing site plan
- 1MCo4-SCJ-EV-DPL-SS05\_SLo7-24002 Existing golf course layout
- 1MCo4-SCJ-EV-DPL-SS05\_SLo7-241110 Existing topography plan
- 1MCo4-SCJ-EV-DPL-SS05\_SLo7-241500 Proposed topography plan
- MCo4-SCJ-EV-DGA-SS05\_SLo7-240400 General arrangement plan
- 1MCo4-SCJ-EV-DPL-SS05\_SLo7-241100 Isopachyte plan (showing cut fill change in levels)

4.3.3 *Break down of the excavated materials for each site and quantities that will be placed at each site:*

- There will be approximately 52,000m<sup>3</sup> of cut across the golf course. Based on the anticipated geology this volume will include primarily topsoil, subsoil and London Clay with the potential for some Lambeth Group soils. Materials of differing strata will be segregated and stored separately during excavation and will be subject to testing as defined in the specification to ensure suitability for re-use. Only suitable materials re-used within the remodelling of the golf course (reuse on site of origin).
- Approximately 99,700m<sup>3</sup> of fill (in ground volume) is required to achieve the design levels and objectives across the golf course. The approximate 48,000m<sup>3</sup> shortfall will be made up using natural soils (London Clay, Harwich Formation and Lambeth Group) from the excavation of the West Ruislip portal, immediately to the south of the Golf Course (transfer

of natural soils).

- Once the required design levels across the golf course have been achieved, direct transfer of material from the portal site will stop.
- No placement of materials is proposed within the extent of the West Ruislip portal.

**4.3.4** *How has consolidation/compaction being considered in the above mass balance calculations?:*

- the mass balance described above is based on the need for 48,000m<sup>3</sup> additional in ground volume following compaction to achieve the required levels across the golf course. There will be an element of bulking during excavation and compaction during placement. This will depend on the properties of each material (strata) encountered during excavation and the subsequent compaction necessary to achieve the required geotechnical properties across the golf course. Once sufficient material has been placed and compacted to achieve the desired levels across the golf course, transfer will stop.

**4.3.5** *How has loss due to treatment being considered in the above mass balance calculations (if applicable)?:*

- Not applicable as treatment is not proposed.

**4.3.6** *How has the addition of treatment materials being considered in the above mass balance calculations (if applicable)?:*

- Not applicable as no treatment is proposed.

## **4.4** *Contingency arrangements*

**4.4.1** *What is to happen to, and who is to pay for out of specification materials?*

- Any out of specification materials, from either the donor or receiving sites, will be identified and segregated during excavation before being exported from site following characterisation. Out of specification materials and associated costs will be the responsibility of SCS.

**4.4.2** *What is to happen to, and who is to pay for any excess materials?*

- Route A: Surplus materials (i.e. materials over the volume needed on the golf course) will be removed from the portal site by SCS via rail or road. This will include any Made Ground within the extent of the donor site which will not be used within the golf course. The material will, where possible, be beneficially reused elsewhere in the HS2 scheme, under the MMPF or environmental permit or exemption (if required).
- Route B: No surplus materials and expected due to the shortfall in material at the golf course.

**4.4.3** *What happens if the project programme slips in relation to excavated materials or materials undergoing treatment?*

- The storage area within the golf course has been designed so as to provide sufficient capacity for material storage in the event of slips in programme. There is also long-term storage available to add further resilience.

#### 4.4.4 *Other identified risk scenarios for the project (relating to excavated materials)?*

- None identified.

### 4.5 The tracking system

#### 4.5.1 *Description of the tracking system to be employed to monitor materials movements:*

##### *Route A: Reuse on site or origin*

4.5.2 The reuse of material within the golf course will be a relatively simple cut and fill for reuse within the boundary. The main materials types such as topsoil, subsoil and natural London Clay will be segregated and managed during reuse. Drawing 1MCo4-SCJ-EV-DPL-SS05\_SL07-241210 shows material storage areas and main haul routes within the golf course. Individual loads within the main earthworks cut and fill will not be recorded, rather the tracking system will be at a macro-level confirming the types of materials used. There will be a watching brief during the works and verification of the soils reused to demonstrate they are suitable.

4.5.3 The SCSJV Soil Resource Plan (1MCo4-SCJ-CL-PLN-SS05\_SL07-000003) describes the requirements for earthworks, landscape construction and a soil management strategy. It also discusses soil monitoring during the construction period. This will include monitoring and recording the location of stockpiles, volumes and dates. A soil scientist will carry out regular site inspections. A short report will be produced after each site inspection. At the end of the works, a completion report will be issued to confirm that a suitable soil quality has been achieved and that the soils are compliant with the specification and fit for the landscape scheme.

##### *Route B: Transfer of soils to the golf course*

#### 4.5.4 The tracking system will include:

- Volumes of each material type will be estimated from existing ground investigation data for the portal site and then confirmed onsite during the works by surveyors.
- Separate stockpiles will be created and maintained for different strata (e.g. topsoil, subsoil, clay etc.) as they are encountered and excavated.
- Stockpiles which will be labelled physically on site and on a site plan and demarcated with runoff protection where required.
- Stockpiles will be labelled with their origin and intended use / final destination or waste code as appropriate. This information will also be available on the site plan.
- Records of stockpiles and the transfer of soils to the golf course will be maintained electronically using the spreadsheet provided in Appendix C.

- Materials will be tested to the frequency and type of testing as outlined in the site sampling plan (engineering properties and chemical testing).
- Out of specification materials will be identified and segregated before being exported from site.
- Drawing 1MCo4-SCJ-CL-DMA-SS05\_SL07-480200 shows material storage areas and main haul routes within the portal.

4.5.5 The SCSJV Soil Resource Plan (1MCo4-SCJ-CL-PLN-SS05\_SL07-000003) describes the requirements for earthworks, landscape construction and a soil management strategy as materials from the portal are reused in the golf course. It also discusses soil monitoring during the construction period. This will include monitoring and recording the location of stockpiles, volumes and dates. A soil scientist will carry out regular site inspections. A short report will be produced after each site inspection. At the end of the works, a completion report will be issued to confirm that a suitable soil quality has been achieved and that the soils are compliant with the specification and fit for the landscape scheme.

4.5.6 *Procedures put in place to prevent contaminants not suitable for the treatment process being accepted*

- Not applicable. Not treatment is proposed.

4.5.7 *Procedures put in place to prevent cross contamination of materials not in need of treatment, wastes awaiting treatment and treated materials*

- The material excavated from the portal for re-use within the Golf Course will be natural material. Ground investigation and geoenvironmental assessments have not identified the presence or significant risk of contamination. Significantly contaminated materials are not expected. There will be a process of assessment of the suitability of excavated material and processes in place to segregate potentially unsuitable materials. Made Ground stripped from the site will be stockpiled separately and removed from site.

4.5.8 *Demonstrate that materials that do not require treatment and successfully treated materials reach their specific destination*

- Only natural soils are proposed to be used within the works. Only basic physical segregation and placement of materials is expected. Depending on the time of year and weather conditions soil soils may need to be dried out.
- The tracking system will record the movements of materials from excavation through storage to placement. This will demonstrate that materials reach their specific destination. This is described under route A and Route B above.

4.5.9 Ensure that waste for off-site disposal or treatment is properly characterised and goes to the correct facility

- Unsuitable materials such as Made Ground or geotechnically unsuitable materials will be

removed from site for either beneficial use or disposal. The SCSJV Waste and Excavated Materials Management Procedure S1 and S2, 1MCo3-SCJ-EV-PRO-S001-000007. This provides substantial details on the procedures for control and classification of waste soils.

4.5.10 *Tracking forms/ control sheets that are to be used to monitor materials movements.*

- Copies of the control sheets documentation are included in Appendix C.

4.5.11 *For Hub Sites within Cluster Projects and where materials need treatment before reuse:*

- Not applicable, the work is not proposed as a hub and cluster project.

## 4.6 Records

4.6.1 *Where, and in what form, are records to be kept?:*

- In the first instance, for both routes A and B records will be in paper form and kept onsite as part of the document keeping and recording of site activities. The information will also be kept electronically in spreadsheets and plans. Documents will be transferred to electronic format either as scanned copies or entry into material tracking spreadsheets.
- The SCSJV Waste and Excavated Materials Management Procedure S1 and S2 (1MCo3-SCJ-EV-PRO-S001-000007), provides substantial details on the procedures for waste and excavated materials management and monitoring (Section 6.11).
- The SCSJV Soil Resource Plan (1MCo4-SCJ-CL-PLN-SS05\_SLo7-000003) describes the requirements and methods for inspections and record keeping.

## 4.7 Verification plan

4.7.1 *Provide or explain the Verification Plan which sets out how you will record the placement of materials and prove that excavated materials have been reused in the correct location and in the correct quantities within the development works (see 3.4 of the DoWCoP):*

4.7.2 It is envisaged that single report covering both scenarios will be produced upon the completion of the works as material from both sites will be reused on the golf course only.

4.7.3 The verification report will include:

- an executive summary;
- copies of the contractor's method statement and health & safety risk assessment;
- details of the contractors tracking systems;
- evidence of the watching brief;
- details of any unexpected contaminated materials, and the remediation or treatment required;

- relevant drawings, of both as-found and as-built;
- record design changes;
- details of parties involved in undertaking the work;
- colour photographs of key stages of development work;
- laboratory certificates (environmental and geotechnical as required by specifications/procedures) and assessment of results to verify the suitability of the imported material and excavated material from the portal;
- results of any testing as detailed in the earthworks specification to demonstrate material was placed in accordance with the requirements of the specification;
- details of any out of specification material encountered (not anticipated) together with details of how this material was handled, segregated, and final classification/destination
- volumes and classifications of any the reuse of excavated material and soil waste sent off site and the destination of all waste soils;
- the soil scientist inspection reports and completion report; and
- volumes and descriptions of any surplus materials and plans for reuse in future phases of development.

Document title: Materials Management Plan - Ruislip Golf Course S2

Document no.: 1MCo4-SCJ\_SDH-EV-PLN-SS05\_SLo7-000002

Revision: Co3

## Appendix A – Regulatory correspondence

## Chris Barrett

---

**Subject:** FW: Ruislip Golf Course - Outline MMP

**From:** Gallagher, Lucy A <[lucy.gallagher@environment-agency.gov.uk](mailto:lucy.gallagher@environment-agency.gov.uk)>

**Sent:** 18 January 2019 11:48

**To:** Ian Thynne <[ithynne@hillingdon.gov.uk](mailto:ithynne@hillingdon.gov.uk)>; Katie Kerr <[Katie.Kerr@arup.com](mailto:Katie.Kerr@arup.com)>

**Cc:** Paul Lippitt <[Paul.Lippitt@hs2.org.uk](mailto:Paul.Lippitt@hs2.org.uk)>; Wales, Matthew <[matthew.wales@environment-agency.gov.uk](mailto:matthew.wales@environment-agency.gov.uk)>; Parr, Matt R <[matt.parr@environment-agency.gov.uk](mailto:matt.parr@environment-agency.gov.uk)>

**Subject:** [External] Ruislip Golf Course - Outline MMP

Good morning Katie/Ian

Thank you both for your time on the telephone yesterday.

As discussed and agreed with you both, in order to be able to progress this we (the EA) have asked that an Outline MMP is produced for the proposed re-development of Ruislip Golf Course.

Whilst this document does not need to contain all the final details of the full MMP, it should:

- demonstrate compliance with HS2's Technical Standards (Material Management Plan Framework)
- contain sufficient information on material types/suitability/approx. volumes/certainty of use etc
- outlines the earthworks strategy/design

Overall this document should provide sufficient information to satisfy the aim to use the CL:AIRE Definition of Waste: Code of Practice (DoWCoP) and demonstrate the proposed work at Ruislip is not a waste activity.

We will review the Outline MMP, and if satisfied that it meets the requirements of the DoWCoP will produce a response confirming we have no objection.

With regards to a formal signed letter from the EA - as discussed with Ian yesterday, our response will be similar to the usual response we would send in response to other DoWCoP applications but I will ensure it contains specific reference to the site and the Outline MMP document, which I trust will suffice for LBH's validation purposes.

We feel this approach sets a reasonable and robust standard moving forward with both HS2 and other non-HS2 related DoWCoP applications.

Thanks all for time spent and cooperation in resolving this,

Kind regards

Lucy

**Lucy Gallagher**

**Waste and Material Technical Specialist - High Speed Two (HS2) Core Team**  
**Environment Agency** | Sale Depot, Carrington Lane, Sale, Cheshire M33 5NL

**Contact** | **Mob:** 07879 115 257 | **Ext:** 02030250799  
[lucy.gallagher@environment-agency.gov.uk](mailto:lucy.gallagher@environment-agency.gov.uk)

**Incident management standby role : Flood Warning Duty Officer**



**Creating a better place  
for people and wildlife**



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## Chris Barrett

---

**Subject:** FW: [External] Waste or Non Waste as Ruislip Golf Course

**From:** Ian Thynne <[ithynne@hillingdon.gov.uk](mailto:ithynne@hillingdon.gov.uk)>

**Sent:** 17 January 2019 16:47

**To:** Katie Kerr <[Katie.Kerr@arup.com](mailto:Katie.Kerr@arup.com)>

**Cc:** Karl Dafe <[KDafe@hillingdon.gov.uk](mailto:KDafe@hillingdon.gov.uk)>

**Subject:** Re: [External] Waste or Non Waste as Ruislip Golf Course

Katie,

With regards to the EA - I spoke with them today and they confirmed that they would need an outline MMP which would then trigger a formal response from them to us. I believe they will update you directly to avoid any doubt as to what is required. This works for us as it would establish a transferable approach to other schemes and developers, in other words, an effective precedent.

With regards to the screening - I am somewhat surprised by the request as I had a lengthy discussion with Sean - essentially, if your team was going to insist on an EIA, I would undertake screening, but first would need the detailed ecology surveys referred to. I have not yet received these.

Evidently there has been some crossed wires here - so if you can provide those detailed surveys then I can provide an informed request for a screening direction, if there is reticence, please let me know and I will proceed without.

Kind regards

**Ian Thynne**  
**Planning Specialists Team Leader**

**direct:** 01895 558 326

**general:** 01895 556 000

**e-mail:** [ithynne@hillingdon.gov.uk](mailto:ithynne@hillingdon.gov.uk)

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Middlesex, UB8 1UW

On Thu, 17 Jan 2019 at 15:10, Katie Kerr <[Katie.Kerr@arup.com](mailto:Katie.Kerr@arup.com)> wrote:

Hi Ian,

The EA will be in contact in respect of next steps in respect of the import of materials.

In the meantime please can you respond to the queries below? Presumably the SoS's deadline has now passed – are you following this up? Please can you send a link to the screening documents on your website?

Many thanks, Katie

---

**From:** Katie Kerr  
**Sent:** 04 January 2019 12:04  
**To:** 'Ian Thynne' <[ithynne@hillingdon.gov.uk](mailto:ithynne@hillingdon.gov.uk)>  
**Cc:** Lisa Ashari <[Lisa.Ashari@arup.com](mailto:Lisa.Ashari@arup.com)>; Claire Beedle <[Claire.Beedle@scstrailways.co.uk](mailto:Claire.Beedle@scstrailways.co.uk)>; Kimberley Royer-Harris <[Kimberley.Royer-Harris@hs2.org.uk](mailto:Kimberley.Royer-Harris@hs2.org.uk)>; 'Amechi Dafe' <[kdafe@hillingdon.gov.uk](mailto:kdafe@hillingdon.gov.uk)>  
**Subject:** RE: [External] Waste or Non Waste as Ruislip Golf Course

Hi Ian,

Happy new year.

Thanks for your email. We'll liaise with the EA when they are back in the office next week and get back to you, this shouldn't be a problem.

Please can you confirm what date you sent the ES screening opinion to the Secretary of State so that we know when it was/is expected? Also please can you send a link to the screening letter/opinion on your website as we haven't been able to find it?

Thanks, Katie

**From:** Ian Thynne [<mailto:ithynne@hillingdon.gov.uk>]  
**Sent:** 24 December 2018 12:21  
**To:** Katie Kerr <[Katie.Kerr@arup.com](mailto:Katie.Kerr@arup.com)>; Sean Cunniffe <[Sean.Cunniffe@hs2.org.uk](mailto:Sean.Cunniffe@hs2.org.uk)>  
**Subject:** [External] Waste or Non Waste as Ruislip Golf Course

Katie,

I have been in fairly lengthy discussions with the EA about the waste/non-waste matter for the golf course application.

As discussed previously, we have to make sure that what advice we give is attributable to any other applicant.

We need a formal letter from the EA in order for us to reach a definitive position on the way golf course application is processed. This requires the letter to be specifically linked to a document submitted by the applicant so that we have clear certainty at validation stage.

So far I have had a couple of mixed messages from the EA and I am seeking clarity and formality as to their opinion. We can't deal in theory, so if we have an approach from the EA, I want it formally in letter format and linked specifically to a report (with references).

That way there can be no doubt and we have a clear approach we can adopt with other applicants who don't have the benefit of a team at the EA who is dedicated to them.

Hopefully we will get this early new year and we can complete the advice.

Kind regards

***Ian Thynne***

***Planning Specialists Team Leader***

***direct: 01895 558 326***

**general:** 01895 556 000

**e-mail:** [ithynne@hillingdon.gov.uk](mailto:ithynne@hillingdon.gov.uk)

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**Skanska Costain STRABAG  
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**Amechi Karl Dafe**  
London Borough of Hillingdon – Major  
Applications Team

**Civic Centre, High Street  
Uxbridge  
Middlesex  
UB8 1UW**

Date	Our reference/No	Our contact
12 April 2019	1MC04-SCJ-PL-CRO- SS05_SL07-000001	
Your date	Your reference	Direct Line

Dear Karl,

### **Ruislip Golf Course Pre Application Written Response**

Thank you for sending through LB Hillingdon's pre-application written response on the Ruislip Golf course, dated 20 February 2019, following our meeting on 30 October 2018.

We have liaised with the relevant topic specialists and would like to take this opportunity to respond to some of the points raised in the letter, particularly where the letter comments on technical matters and makes requests for additional information above that set out in LB Hillingdon's Validation checklist.

Reference is made to the Town and Country Planning Act 1990 (TCPA) under which consent for the golf course redevelopment is sought. This states that requests for information by local planning authorities:

- 1) must be reasonable having regard, in particular, to the nature and scale of the proposed development; and*

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Registered in England: Registration number 191408

**Costain Limited**  
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Hertfordshire WD3 5LY

**STRABAG**

Registration of an UK establishment: BR015270

- 2) *may require particulars of, or evidence about, a matter only if it is reasonable to think that the matter will be a material consideration in the determination of the application. (Section 62 [4A])*

In light of this, there are a number of requests made by LB Hillingdon that are not considered to be justified in this case. We have provided comment below responding to these.

### **Import of material**

HS2 has proposed that the importation of material is dealt with using a Material Management Plan (MMP) under the CL:AIRE Definition of Waste Code of Practice (DoWCoP). This is a well-established approach to managing the transfer of clean natural materials between schemes of this nature and has been used on numerous similar sites for many years in a very similar fashion. Further information can be found under the CL:AIRE Definition of Waste: Development Industry Code of Practice (available at this link: <https://www.claire.co.uk/projects-and-initiatives/dow-cop/28-framework-and-guidance/111-dow-cop-main-document>) and case studies are available on the CL:AIRE website.

HS2's waste planners discussed the approach with the Environment Agency's waste planning team who agreed from the outset that this was the most appropriate approach in this case. Correspondence confirming the Environment Agency's position has been provided to you.

We have subsequently agreed that we will prepare a draft outline MMP which satisfies the Environment Agency that the material in question is being undertaken in accordance with the DoWCoP and is not a waste material.

There is both geotechnical and geoenvironmental data from the HS2 investigations at Ruislip portal which has been assessed and presented to the Environment Agency.

The LB Hillingdon pre-application response suggests that the "*position presented by Arup does not conform to normal practices and therefore sets a precedent*". We stress that this is not the case. The approach being described is well known, established in the industry and in accordance with a national code of practice and was accepted by the waste regulator at first review. It is an approach that has been used for over ten years by a large number of projects across the UK. The 'direct transfer' scenario described in the code of practice is one of the most used scenarios across the UK. We have included in the appendix an analysis presented by CL:AIRE at a recent conference. The direct transfer of clean natural soils between sites (where one site

has no use for the clean natural material and the other site has) is shown in red on those slides. It has been used across the country and in 2018 alone was used 268 times.

### **Land Ownership**

The pre-application letter states that "*the red line boundary includes resident's properties on Hill Rise*". In December 2018 LB Hillingdon's Head of Property and Estates wrote to HS2 confirming that "*LB Hillingdon is the only landowner/party with an interest within the red line boundary*". No development will be undertaken that encroaches into adjoining residential property. We intend to serve notice on LB Hillingdon only in accordance with the December correspondence.

### **Contaminated Land**

For clarity, the application will include a Geoenvironmental Desktop Study (preliminary risk assessment) and, as is standard for applications of this type, we would expect more detailed information including ground investigation and a SSRS to be submitted after determination and prior to commencement of construction. These details could be the subject of conditions on the grant of any planning permission.

The letter provides detail on monitoring and management routines which again will be dealt with at the detailed design stage. We would expect such routines to be commensurate with an application of this nature.

### **Transport**

It has been advised that a Transport Assessment should be submitted with the application due to the "*scale of the proposal*". A Transport Statement has been prepared which estimates that on average there will be one construction vehicle movement per day and operational traffic will remain largely as existing. The redevelopment of the golf course will use inert material from construction of the West Ruislip Portal, this will result in a reduction of over 4,500 vehicle movements on the public highway. Given the relatively insignificant impact of the development proposals, it is considered that a Transport Assessment is not justified in this case.

It is also requested that an assessment of the "*hybrid*' HS2/golf course project" is provided. The HS2 Act grants the power to construct and maintain works specified in Schedule 1, authorises works for the purpose of or in connection with the scheduled works within Act limits and grants deemed planning permission under Part 3 of the TCPA. HS2 works will be the subject of Schedule 17 requests for approval and will be governed by Environmental Minimum Requirements controls which have been considered sufficient by Parliament when it approved deemed planning permission for

the HS2 railway. This application does not benefit from the HS2 powers and is therefore coming forward in accordance with the TCPA which requires the application to assess the impacts of the development for which consent is sought. Given the transport impact on the local highway network will be negligible it is not considered necessary to provide an extensive cumulative assessment of already consented development. The golf course construction vehicle numbers will feed into the HS2 Local Traffic Management Plan, although given the low numbers the impact will be negligible.

In terms of safety auditing, since no alteration is proposed to a public highway this is not considered to be necessary. Swept paths have also been requested – it is assumed that this refers to construction vehicles entering and travelling within the site. This information will be provided at the detailed design stage as part of the Construction Logistics Plan.

### **Drainage and Flood Risk**

A Drainage Report and Flood Risk Assessment will be submitted with the application which will provide information on the proposed sustainable drainage arrangements and calculations sufficient to determine the application. The EIA Screening Response from LB Hillingdon in respect of flood risk notes that *“the risk is not considered to be of more than local importance and will be dealt with through standard planning application processes”*.

It has been requested that modelling of the existing and future River Pinn is updated to include the Ickenham Stream, its diversion and springs. The application will demonstrate that the proposed run off rates for the site will be significantly reduced from the 1 in 100 rainfall event plus 40% of climate change to Greenfield rates. A detailed drainage model will be developed during detailed design and will include the proposed geometry for the channels, however it is not proposed to include information in respect of the springs as this will not be significant in the design of the drainage system.

The pre-application letter requests ground water performance from borehole data (collected as part of HS2 Main Works), this can be provided. The FRA will consider the risks of flooding from all relevant sources. The Areas Susceptible to Groundwater Flooding (AStGWF) data demonstrates that the application site has a low susceptibility (<25%) to groundwater flooding.

Cross sections of the proposed solutions for the channels, attenuation elements and the interface with the HS2 Main Works have been requested. The application will

include drainage drawings showing a level of detail commensurate with the nature of the works and the risk of flooding (as identified as being low by LB Hillingdon as well as HS2). An overview of interfaces with HS2 works will also be provided. Further detailed drainage information will be submitted at a later stage, as is common practice.

## **Landscape**

The pre-application letter requests a Visual Impact Assessment. As part of the EIA Screening Process, LB Hillingdon provided the following response in respect of the potential visual impact: *“The Council accepts and agrees with the conclusions that the following impacts [...] landscape and visual] will not result in likely significant effects in the context of EIA”*. Based on this previous advice, it is considered that a full Visual Impact Assessment is not required. The Design and Access Statement will include a visual study providing a qualitative assessment of visual impacts.

The letter further requests a 'Full Arboricultural Assessment', an 'Arboricultural Implications Assessment', a 'Tree Survey' and an 'Arboricultural Method Statement'. The application will include a Tree Survey and an Arboricultural Impact Assessment. As is standard practice a full Arboricultural Method Statement will be prepared at the detailed design stage.

A full Planting Specification and Schedule has been requested as part of the planning application. As is standard practice indicative information will be included in the planning application and more detail will be submitted at the detailed design stage.

The pre-application letter requests that some application documents include an assessment of 'the haul road' (we presume this to be the road between Sharps Lane and the Portal). The haul road is within the HS2 Act limits and therefore the Act powers are applicable. Therefore, it is not considered necessary for this application to assess the impacts of development outside its red line boundary

## **Air Quality Assessment**

The pre-application letter requests a full Air Quality Assessment. The LB Hillingdon Screening Opinion states that no significant effects in respect of air quality are likely. The application site does not fall within any category for which an Air Quality Assessment is required in LB Hillingdon's Validation Checklist and is not located in an Air Quality Management Area. Our view, and that previously expressed by LB Hillingdon, is that such an assessment is not required.

## **Noise Impact Assessment**

The pre-application letter requests a detailed Noise Assessment to evaluate noise impacts of the proposal in construction and operation. A noise impact assessment will be submitted in respect of the operation of the rifle range. There will be no material change in the noise from the golf course during operation as the use will remain as existing.

In respect of construction noise, all works associated with HS2 need to be in line with the HS2 Code of Construction Practice and this mitigation is consistent with or exceeds typical requirements. For construction traffic noise, there will be a reduction in vehicle numbers compared to the baseline (HS2 works without the golf course development), with on average one construction vehicle movement per day.

## **Rifle Range**

The rifle range has been incorporated into this application at the request of LB Hillingdon. The design of the rifle range has not changed since the Rifle Club sought pre-application advice and its approximate location to the south of the proposed driving range has been agreed with Hillingdon Golf. It is therefore assumed that the proposals for this element remain acceptable.

## **Financial Bond**

The letter suggests that a Financial Bond to cover the cost of any unfinished works is required. The applicant in this case is HS2 Ltd., an agent of the Crown and as such there is minimal risk that the applicant would 'fail as an organisation' as suggested in the letter. Providing a Bond of this nature for a publically funded scheme would be unprecedented. Such a Bond is also contrary to the spirit of the S106 regime which requires all sums to be upfront and visible.

HS2 will submit a planning application in line with the requirements of the LB Hillingdon Validation Checklist and TCPA 1990 requirement for reasonable information having regard, in particular, to the nature and scale of the proposed development. Based on ongoing discussions with LB Hillingdon some additional information above what would be required as standard will be included in the application, for example an Outline MMP.

The application will be robust and provide LB Hillingdon with a level of detailed information more than sufficient to determine the application. As is standard practice, more detailed information will be submitted for some topics at a later stage and we will look to agree the conditions through which this will be required prior to determination

of the application. Submitting significant information over and above what is necessary does not represent best use of public money either in respect of HS2 preparing the application or LB Hillingdon reviewing and determining it.

Yours Sincerely



Claire Beedle  
Consents Manager  
**For and on behalf of SCS JV Main Works Lot S1 & S2**

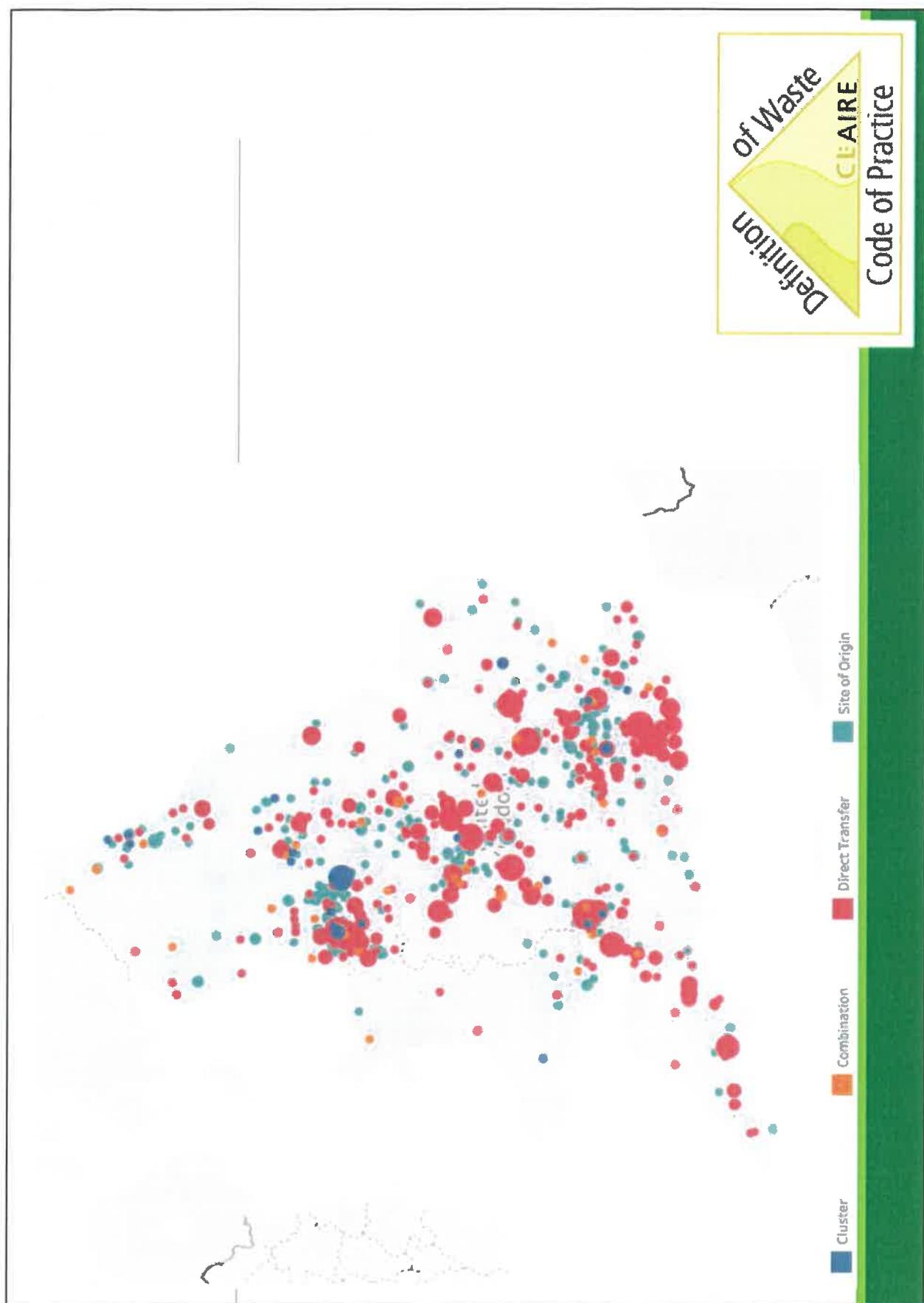
cc: Ian Thynne

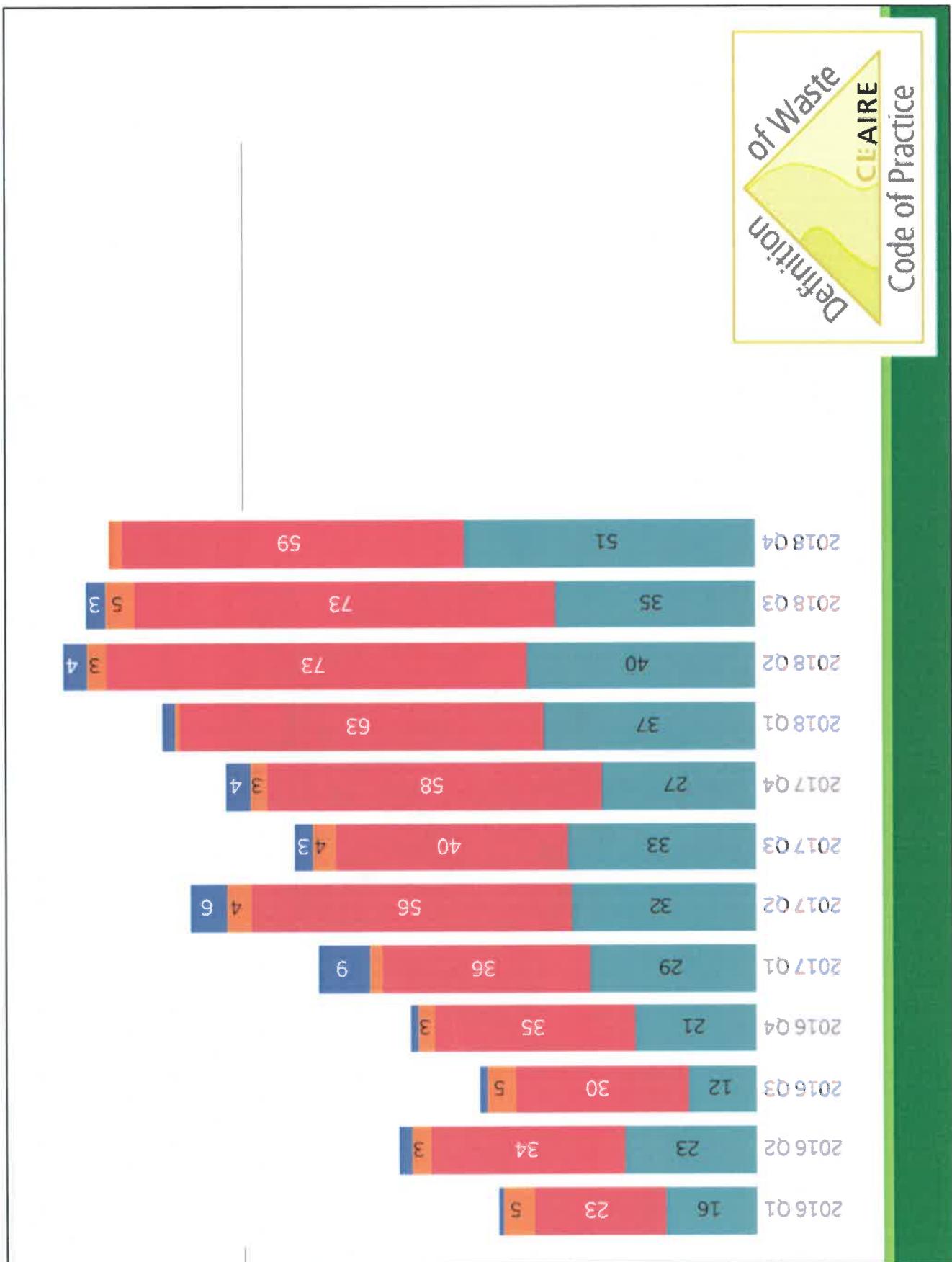
# Definition of Waste Code of Practice: 10 Year Review

NICHOLAS WILLENBROCK

CL:AIRE









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Tel: 01895 250230  
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Email: [kdafe@hillingdon.gov.uk](mailto:kdafe@hillingdon.gov.uk)  
Date: 20th February 2019  
Our Ref: 10737/PRC/2018/204

Dear Claire Beedle

**RE: Remodelling of Ruislip Golf Course, incorporating: reconfiguration of 18 existing hole course into a 9 hole course, short game putting and practice area and 6-hole academy course; demolition of existing covered driving bays and construction of replacement**

**20-bay driving range, including associated floodlights and safety netting; landscaping works; realignment and enhancement of public footpath U81; excavation of a new channel for the Ickenham Stream incorporating new ponds; and other associated works.**

**SITE: Ruislip Golf Course Ickenham Road Ruislip**

I refer to your request for pre-application planning advice dated 11-10-18, our meeting on 30th October 2018 and subsequent correspondence relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers: Pre Application Information ref: 1MC04-SCJ-IN-APP-SS05\_SL07-000003 Rev. P01 - received 04 Sep 2018  
1MC04-SCJ-EV-DPL-SS05\_SL07-241100 P01.1 Cut and fill Rev. P01.1 - received 21 Nov 2018  
1MC04-SCJ-EV-DGA-SS05\_SL07-24040 General arrangement Rev. P01.1 - received 21 Nov 2018  
1MC04-SCJ-EV-DGA-SS05\_SL07-240000 Location plan Rev. P02.1 - received 04 Sep 2018  
GGD2820 - RUISLIP - DRIVING RANGE - received 21 Nov 2018  
GGD2821 - RUISLIP - FENCING PLAN - received 21 Nov 2018  
1MC04-SCJ-DR-DPL-SS05\_SL07-241002 Drainage Rev. P01.1 - received 21 Nov 2018  
1MC04-SCJ-DR-DPL-SS05\_SL07-241001 Drainage Rev. P01.1 - received 21 Nov 2018  
1MC04-SCJ-EV-DPL-SS05\_SL07-241001 Existing site Rev. P01.1 - received 21 Nov 2018  
1MC04-SCJ-EV-DSK-SS05\_SL07-249401master plan Rev. P01 - received 21 Nov 2018

**Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.**

### **The Site and Surrounds**

The site is located off Ickenham Road and accessed directly via Clacks Lane which is designated as publicly adopted highway, in proximity of West Ruislip LU station. Ruislip Golf Course covers an area of approximately 42 hectares and is located immediately to the north of West Ruislip Station and approximately 1km to the west of Ruislip High Street. You have explained that the application site will comprise the majority of the existing golf course, the area of which is approximately 36 hectares. The slightly reduced area is due to the exclusion of the southern part of the golf course, which falls within the boundary of the High Speed Rail (London - West Midlands) Act 2017 (HS2 Act).

A clubhouse building is located in the south-eastern part of the Golf Course. This encompasses the Fairway public house (operated by Fayre and Square), changing rooms, golf equipment shop and trolley hire.

A surfaced car park with approximately 190 car parking spaces and 7 disabled car parking spaces is located to the north of the clubhouse.

A 40-bay driving range is located immediately to the north-west of the clubhouse, comprising a 55m wide single storey structure, flat grassed outfield with distance marker, dummy holes and floodlights (which are also located on the roof of the range). 20m high safety netting surrounds the outfield.

### **The Proposal**

The development comprises the remodelling of Ruislip Golf Course, incorporating:

- > reconfiguration of 18 existing hole course into a 9 hole course, short game putting and practice area, and 6-hole academy course;
- > The importation of approximately 50,000 m<sup>3</sup> of excavated spoil material removed from the construction of the neighbouring HS2 Tunnel portal;
- > demolition of existing covered driving bays and construction of replacement 20-bay driving range, including associated floodlights and safety netting; landscaping works;
- > realignment and enhancement of public footpath U81;
- > excavation of a new channel for the Ickenham Stream incorporating new ponds;
- > relocation of the rifle range and other associated works.

For construction purposes, a new vehicular access allowing for 'one-way' HGV site entry construction traffic would be positioned directly onto Ickenham Road with a new linkage to new access road, provisions which are to run alongside the golf site envelope, following the line of the new east-west HS2 rail track. A new roadway will also run alongside the existing golf range access road, running parallel to the Ickenham Road site frontage, in order to allow construction related vehicles to leave the site via Clacks Lane.

A public footpath (designated as path U81) would be subject to rerouting with a new 'east-west' link provision to facilitate an improved footpath experience by patrons.

The spoil removed from the construction of the neighbouring HS2 Tunnel portal will be reused to create the form/profile of the new course, which you explain, is likely to significantly minimise HGV haulage related movements to and from the site, as the need to import extraneous spoil is negated.

You have informed officers that the golf course construction will take 18 months + 18 months 'rest' / establishment, prior to re-opening to the public in 2024.

## **Planning Policy**

### **Development Plan**

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

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

The Local Plan: Part 1 - Strategic Policies (2012)  
The Local Plan: Part 2 - Saved UDP Policies (2012)  
The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2018) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

### **Emerging Local Plan: Part 2**

The Local Plan Part 2 Draft Proposed Submission Version (2015) was submitted to the Secretary of State on 18 May 2018. This comprises a Development Management Policies document, a Site Allocations and Designations document and associated policies maps. This will replace the current Local Plan: Part 2 - Saved UDP Policies (2012), once adopted.

The document was submitted alongside Statements of Proposed Main and Minor Modifications (SOPMs) which outline the proposed changes to submission version (2015) that are being considered as part of the examination process.

Submission to the Secretary of State on 18th May 2018 represented the start of the Examination in Public (EiP). The public examination hearings concluded on the 9 August 2018 and the Inspector is currently assessing the findings of these hearings. The EiP will conclude when a final Inspector's Report is published.

Paragraph 48 of the NPPF (2018) outlines that local planning authorities may give weight to relevant policies in emerging plans according to:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

On the basis that the Council is awaiting the final Inspector's Report on the emerging Local Plan: Part 2, the document is considered to be in the latter stages of the preparation process. The degree to which weight is attached to each policy is therefore based on the extent to which there is an unresolved objection being determined through the public examination process and the degree of consistency to the relevant policies in the NPPF (2018).

Relevant emerging policies include those listed below:

DMHB 11, Design of New Development  
DMHB 14, Trees and Landscaping

DMEI 2, Reducing Carbon Emissions  
DMEI 6, Development in Green Edge Locations  
DMEI 7, Biodiversity Protection and Enhancement  
DMEI 14, Air Quality  
DMT 1, Managing Transport Impacts  
DMT 2, Highways Impacts  
DMT 6, Vehicle Parking  
DMCI 3, Public Open Space Provision  
DMCI 7, Planning Obligations and Community Infrastructure Levy

Part 1 Policies:

PT1.BE1 (2012) Built Environment  
PT1.CI1 (2012) Community Infrastructure Provision  
PT1.CI2 (2012) Leisure and Recreation  
PT1.EM1 (2012) Climate Change Adaptation and Mitigation  
PT1.EM11 (2012) Sustainable Waste Management  
PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains  
PT1.EM4 (2012) Open Space and Informal Recreation  
PT1.EM5 (2012) Sport and Leisure  
PT1.EM6 (2012) Flood Risk Management  
PT1.EM7 (2012) Biodiversity and Geological Conservation  
PT1.EM8 (2012) Land, Water, Air and Noise  
PT1.HE1 (2012) Heritage  
PT1.T1 (2012) Accessible Local Destinations

Other Policies:

AM1 Developments which serve or draw upon more than a walking distance based catchment area - public transport accessibility and capacity considerations  
AM13 AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): -  
(i) Dial-a-ride and mobility bus services  
(ii) Shopmobility schemes  
(iii) Convenient parking spaces  
(iv) Design of road, footway, parking and pedestrian and street furniture schemes  
AM14 New development and car parking standards.  
AM15 Provision of reserved parking spaces for disabled persons  
AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity  
AM6 Measures to discourage the use of Local Distributor and Access Roads by through traffic  
AM7 Consideration of traffic generated by proposed developments.  
AM8 Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes  
AM9 Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities  
BE3 Investigation of sites of archaeological interest and protection of archaeological remains  
BE38

	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE39	Protection of trees and woodland - tree preservation orders
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EC4	Monitoring of existing sites of nature conservation importance and identification of new sites
EC5	Retention of ecological features and creation of new habitats
MIN12	Proposals for extraction of clay or brickearth
MIN13	Proposals for chalk extraction
MIN16	Waste recycling and disposal - encouragement of efficient and environmentally acceptable facilities
MIN20	Proposals involving landfilling, re-working or disturbance of old landfill sites - gas control and monitoring requirements
MIN21	Impact of development proposals involving landfilling on the local hydrogeological regime - requirement for monitoring and mitigation measures
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL19	Access to and use of the countryside by all sections of the community
OL2	Green Belt -landscaping improvements
OL26	Protection and enhancement of trees, woodland and landscape features
OL4	Green Belt- replacement or extension of buildings
R16	Accessibility for elderly people, people with disabilities, women and children
R7	Provision of facilities which support arts, cultural and entertainment activities
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.19	(2016) Sports Facilities
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.18	(2016) Construction, excavation and demolition waste
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 6.12	(2016) Road Network Capacity
LPP 6.13	(2016) Parking
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.

LPP 7.16	(2016) Green Belt
LPP 7.2	(2016) An inclusive environment
LPP 7.21	(2016) Trees and woodlands
LPP 7.8	(2016) Heritage assets and archaeology
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport

## Main Planning Issues

### 1. Principle of development

The whole of the application site is designated as Green Belt. The main policy issue in relation to this development is considered to be the principle of additional development within the Green Belt and its impact on the character and appearance of the Green Belt.

The London Plan strongly supports the protection, promotion and enhancement of London's open spaces and natural environments. Policy 7.16: Green Belt states that in terms of planning decisions:

"The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance".

The recently revised National Planning Policy Framework (NPPF) is also relevant. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

Nevertheless, the document states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Para 144. states:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

In terms of local policy, Part 1 of the Local Plan continues to give strong protection to Green Belt land. The relevant policy in the Local Plan is EM2 which makes clear that:

"The Council will seek to maintain the current extent"

"Any proposals for development in the Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test".

The 2007 Unitary Development Plan Saved Policies (currently serving as Part 2 of the

Hillingdon Local Plan) are also relevant. Planning policy on Green Belt land is set out at Policies OL1, OL2 and OL4 in the 2007 Hillingdon Unitary Development Plan "Saved" Policies. These policies give strong emphasis to not normally permitting new building in the Green Belt, reflecting overarching national and London wide policies.

Of particular relevance is UDP Saved Policies OL1, which states that agriculture, horticulture, nature conservation, open-air recreation and cemeteries are the only open land uses which are acceptable. New buildings are only acceptable if they are essential for the open land use. No new buildings are proposed as part of this development. The continued or intensified use of the site for open recreational use is considered to comply with Policy OL1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

The proposed development provides outdoor sport and recreation facilities. This is in accordance with Policy R5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), which seeks to protect outdoor and indoor leisure facilities, unless alternative adequate and accessible facilities are available. The over-riding caveat of Saved Policy R16, however, is that such facilities must be accessible to all without increasing the need to use private motor cars. No objections are therefore raised to the principle of the upgrading of the existing golf course, subject to other policies in the Plan.

## WASTE

The importation of waste materials for the upgrade of sporting facilities, at approximately 50,000 m<sup>3</sup> of material is a significant quantity. Although Saved UDP Policies MIN20 and MIN21 identify pollution control measures and the impact of land filling on the local hydrogeological regime as a material consideration, there are no specific adopted Hillingdon Local Plan Part 2 policies setting out the criteria against which this type of proposal should be assessed.

However, emerging Local Plan Part 2 Development Management Policy DMEI 13: (Importation of Waste Material) states:

A) Development proposals that include the importation of waste material (inert or otherwise) must be accompanied by a monitoring plan that includes:

- i) the amount and types of material to be imported;
- ii) the timetable for disposal;
- iii) onsite precautions to be taken to ensure only authorised vehicles and waste will be allowed on to site; and
- iv) methods for reviewing and reporting on the progress of the disposal to the Local Planning Authority.

B) On commencement of the disposal operation the applicant will provide a written report in accordance with A) iv) above that provides details of:

- i) the types and quantities of waste that have been imported, including carrier notices where appropriate;
- ii) the source of the waste imported to the site;
- iii) appropriate details of the company/companies importing the material; and
- iv) updates in accordance with A. iv) pertaining to the progress of material importation and disposal in compliance with the approved plans.

C) Where assurances cannot be given that the appropriate protection and safeguards can be implemented, then the Council will expect the applicant to provide contingency plans including providing security bonds (through legal agreements) to ensure any subsequent harm can be remediated and the site made good.

D) Proposals that include the importation of waste materials (inert or otherwise) that are not accompanied by the appropriate level of controls or safeguards will not be supported.

It is noted that the Environment Agency's (EA) guidance quotes the creation or modification of a golf course as an example of a waste recovery operation. The agency declares strong support for waste recovery over disposal, essentially because the waste is being put to a

useful purpose in replacing other materials which would have had to be used for that purpose, thereby conserving natural resources.

The Environment Agency requires justification, in the form of a 'waste-recovery plan', that an activity is a waste-recovery operation and not waste disposal. For the plan to be accepted, it must respond to a list of criteria, one of which requires the applicant to show that "if you were not able to carry out the activity using recovered waste, you would be able to do the work using non-waste materials".

If the imported material is defined as waste material for planning and environmental purposes, any future application will be referred to the Mayor of London. The Town and Country Planning (Mayor of London) Order 2008 defines "waste development" as any development designed to be used wholly or mainly for the purpose of, or a material change of use to, treating keeping, storing, processing, recovering or disposing of waste.

It is considered reasonable to ensure that the amounts of waste deposited are the minimum necessary for the intended purpose. As a result, normally, a key issue to be considered in assessing any future application would be whether the importation of waste materials is essentially financing the proposed development and consequently the key driver behind the proposals, or whether the proposed amount of fill is reasonable and the minimum necessary for achieving the proposed development.

However, in this case, it is acknowledged that the spoil removed from the construction of the neighbouring HS2 Tunnel portal will be reused to create the form/profile of the new course, which you explain, is likely to significantly minimise HGV haulage related movements to and from the site, as the need to import extraneous spoil is negated. If the extent of adverse environmental impact does not outweigh the identified benefit to be derived from the development, then the question of what exactly constitutes a minimum requirement for purpose may not be so relevant.

Notwithstanding the above mentioned advice, it is noted that Arup has presented the proposals as being not waste related. The summary position is that the material is not seen as a waste byproduct of the works to create the HS2 tunnel boring machine launch site. The material would not need any treatment and can subsequently be used for the reconfiguration of Ruislip Golf Course.

However, you are no doubt aware that the position of HS2 Ltd prior to golf course application coming forward was that it was a waste product. The subsequent interpretation of the material as 'non waste' needs robust consideration, as it has ramifications for validation of planning applications and subsequent referrals to the Mayor of London. It also has significant implications for any future applicants, who may find it useful to present their proposals as not involving a waste product.

As a consequence of the above, lengthy discussions have been held with the Environment Agency through November 2018 and into the new year. The position presented by Arup does not conform to normal practices and therefore sets a precedent. It is absolutely essential that there is clarity as to what needs to be submitted, for an applicant to successfully demonstrate that their by-product material is not likely to be classified as waste.

To that end, the discussions with the Environment Agency have reached what officers consider to be a suitable way forward for a subsequent applicant. The Applicant will need to provide a draft materials management plan (MMP), which includes reports based on significant degree of on- site intrusive investigative work of the source material. This MMP should demonstrate that the material can be categorised as not waste.

The applicant should liaise closely with the Environment Agency and submit the draft Materials Management Plan to them. The Council will need a formal (signed) letter from the

Environment Agency referencing the draft MMP with an appropriate commentary on the contents. If this letter confirms that the draft MMP has satisfied the Agency that the material in question is not a waste product, then the Council will validate the subsequent planning application as non waste related.

However, should the MMP not successfully demonstrate the proposed material is non-waste, or there is no formal letter from the Environment Agency, then the Council will proceed as if the application is related to a waste product and will process it accordingly.

## 2. Design

For the Council's golf courses to remain active public amenity with a healthy volume of usage, it will be necessary to strike the best balance between course improvement, project duration, safety and course maintainability. It is acknowledged that where soils are being used to create a golfing environment, the question of what makes a good design is very subjective. These are specialist areas and it is not the role of the Local Planning Authority to decide whether the proposed works would improve course routing and the golf experience. A significant investment in new and drainage systems will be required to replace the systems currently in use. In addition, irrigation systems will need to be re-installed to cover greens, tees and approaches. However, the development of the golf course has involved discussions with officers of the Council (Stuart Hunt and Gail Kersey) who have influenced and support the evolving design.

Nevertheless, the general principle of the development can be supported, subject to consideration as to whether the material planning benefits outweigh any planning objections or potential harm, relating to noise and disruption during operations, dust, heavy traffic movements, duration of operations, ecological, flooding, drainage and landscape impacts. These issues have been addressed below.

### Landscape and Visual Impact

The site is located within designated Green Belt land. Under the terms of Saved UDP Policy OL1, development in the Green Belt is normally unacceptable unless it is agriculture, cemetery or recreation related. Golf courses are considered an appropriate Green Belt use. However, the potential visual impact that the re-modelling of the golf course could have on the Green Belt must be considered. Therefore, regard should be taken to Saved UDP Local Plan Part 2 Policies OL2 and BE13, which safeguard the Green Belt and ensure the harmonisation of any proposed development. Officers would need to be satisfied that the scale of the proposed scheme is not going to harm the openness of the Green Belt. Saved UDP Policy OL5 will only permit proposals for development adjacent to or conspicuous from the Green Belt if it would not harm the character and appearance of the Green Belt.

It is considered unlikely that the recontouring of the land would be visible from afar affecting the overall character and openness of the Green Belt, and would consequently this element of the proposals is likely to be compatible with the above mentioned Policies. However, the proposals include the erection of a driving range incorporating 20 to 30 metre high fencing with flood lighting, associated supporting towers and a rifle range. Insufficient information has been provided regarding the latter. An assessment of the impacts on the Green Belt will be required, along with a full aboricultural assessment and aboricultural implications assessment (including the impact of the haul road).

With regard to visual impact, as stated above, it is acknowledged that openness does not necessarily equate to flat or uniform topography. Nevertheless, given the associated development proposals, the Visual Impact Assessment should assess how the development impacts on the openness of the Green Belt and its attractiveness as a recreational destination.

### Surveys required

Surveys should include a tree report to BS5837:2012, which should include clear plans showing trees to be retained and those to be removed, together with tree protection and an Arboricultural Method Statement and an ecological survey.

#### Ridge and furrow landscape

Archaeological advice from GLAAS will be sought, to determine the importance / relevance of the residual ridge and furrow field system.

#### Drainage and flood risk design / irrigation

Drainage and flood risk design needs to appear seamlessly as part of the designed landscape.

You have stated that the flood attenuation will be designed to ensure that surface water run-off will be collected and stored for re-use as irrigation. At the meeting, it was emphasised that a back up irrigation system to cater for periods of prolonged drought would be sought.

#### Footpaths

There are a number of footpaths that will be affected by the proposal and will need to be temporarily diverted (and/or possibly stopped up). For footpath closures and re-alignments please refer to Richard Kane, the Council's Rights of Way Officer (rkane@hillingdon.gov.uk). All new footpaths should fit seamlessly into the landscape masterplan. They should provide interesting (circular) and accessible (gradient and materials) routes for walkers, which do not conflict with players on the golf course.

### 3. Amenity

#### ENVIRONMENTAL ISSUES

In assessing any future application, it will be necessary to determine whether material planning benefits outweigh any planning objections or potential harm, relating to noise and disruption during operations, dust, heavy traffic movements, duration of operations, flood ecological and landscape impacts.

Relevant extracts of the NPPF (2018) dealing with environmental and pollution related issues are provided below:

##### Ground conditions and pollution

178. Planning policies and decisions should ensure that:

- a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
- b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
- c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

179. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development - and avoid noise giving rise to significant adverse impacts on health and the quality of life

- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to

ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

These national guidelines are reflected in the relevant Hillingdon Local Plan: Part 1 - Strategic Policies (2012), the Local Plan: Part 2 - Saved UDP Policies (2012) , the London Plan - Consolidated With Alterations (2016) and the emerging Local Plan: Part 2 Policies.

#### Air Quality

In light of the above mentioned considerations, a full air quality impact assessment is required. Although the proposal does not lie within an Air Quality Management Area, in view of the scale and nature of the proposals, a detailed Air Quality Impact Assessment should be prepared to address the impacts of the proposal on air quality including generation of dust and traffic emissions. Consultation should be conducted with the Council's Environment Protection Unit with regard to air quality impacts.

#### Noise Impacts

In accordance with Local Plan Part 2 Saved UDP Policy OE3, it will be important to ensure that noise nuisance will not result from construction and operational activities. A detailed noise assessment will be required to ascertain the noise impacts of the proposal, including impacts from the rifle range. Consultation should be conducted with the Council's Environment Protection Unit with regard to noise impacts.

#### 4. Highways

It is unclear as to why the anticipated transport related application documentation appears to have been downgraded from an 'Assessment' to a less comprehensive 'Statement'. The scale of the proposal would normally warrant the former. This anomaly requires justification and clarification.

Notwithstanding the above, the submitted document should contain detail on the conformity of the proposal with relevant regional and local planning/transport policies and standards related to, for example, the level of parking provision, traffic generation (linked to patronage and construction), suitability of internal roadways and new access point, including safety auditing and very importantly, a demonstration of how the proposed and concurrent construction and phasing programmes would mutually coexist without measurable negative impact on the public realm and project time-lines.

These requirements are not exhaustive and referral to 'Transport for London ' assessment guidance is a pre-requisite.

It is understood that the existing course would close in early 2019 and be fully complete

within 3 years (mid 2022) and closed until 2024. This delayed opening would coincide with overlapping Portal construction works which have anticipated completion target of 2024. Given the long term works programme associated with HS2 and golf course reconfiguration, which has already impacted the highway network across the borough and will continue to do so throughout the build programme - it is the Council's duty and responsibility from the transport/highways perspective to seek a thorough demonstration of the co-ordination of construction works between the remodelling of the course and construction of the new adjacent HS2 portal and 'Headhouse' building (which allows maintenance access to the tunnel portal) at the south-western end of the site, which are to run concurrently.

For example, details of the frequency and routing of daily and peak morning & evening construction related movements for both the HS2 portal and Golf course construction should be produced with relevant time-lines and highway interventions (if so required), in order to ensure that both projects are properly co-ordinated, thereby ensuring the aim of minimum detrimental impact on the public realm.

Such narrative should also include an explanation of how the 'hybrid' HS2/Golf course project would tie-in with all of the neighbouring HS2 project segments such as the relatively adjacent HS2 workings (to the north-west) related to the MSD, Gatemead farmhouse and Oak farm sites which border onto Breakspear Road South.

As stated above, a Transport Assessment will be required, which should include:

- Details of the expected breakdown of delivery lorry movements
- Details of construction access and haul routes within the site
- Lorry load, lorry size,
- swept paths with 300mm error margins
- Traffic generation and safety on the adjoining highway
- Suitable site access for use by construction traffic for soil importation.

The Transport Assessment should fully assess the transport impacts. You are advised to contact the Highway Engineer to agree the scope of the Transport Assessment.

#### Footpaths

With regards to public rights of way, the addition of a new route is a positive for the network, especially for local residents. The diversion route of U81 and the construction of the bridge can only be considered with the detailed submitted plans.

#### 5. Other

##### EIA SCREENING OPINION.

A separate screening opinion was sent on 16 November 2018. The Council has determined that this development will not give rise to likely significant effects. The development falls within the thresholds of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Using the selection criteria outlined in Schedule 3 of the Regulations the London Borough of Hillingdon does not consider that the proposals require EIA.

However, I understand that a screening direction request is currently with the Secretary of State.

#### ARCHAEOLOGY

##### Ridge and furrow landscape

As the site carries no archaeological designations or policy protections, it is not considered to be overly sensitive or exceptional in terms of archaeology. It is noted that Historic

England(GLAAS) has provided pre-application advice which concludes that although the development could cause harm to undesignated archaeological remains and historic landscape features, the likely significance of the assets affected and scale of harm to them, taking account of proposed mitigation, is such that it is unlikely that there would be significant harm as defined in the EIA Regulations and the effects can be managed using planning conditions.

Archaeological advice from GLAAS will be sought to determine the importance / relevance of the residual ridge and furrow field system.

## DRAINAGE AND FLOOD RISK DESIGN / IRRIGATION

The information provided within the planning application will need to address concerns raised in the meeting between HS2 and LBH on 17th May 2018.

Any application should provide detailed plans, showing sustainable drainage arrangements and calculations, justifying the proposed drainage arrangements in this area. This should include a management and maintenance plan which details who will be responsible for the site, for the future.

The modelling of the River Pinn currently does not include the ordinary watercourse and a detailed understanding of the in-put flows for the River Pinn may need to be updated and extended, to include the risks from a number of springs emanating within and ordinary watercourses running across the golf course.

There are drainage concerns about the import material 50,000m<sup>3</sup> of fill material. We would appreciate a copy of the Technical EA report and a clear understanding of the permeability of any spoil introduced. To solve drainage by recontouring, clear cross sections should be provided through the golf course, to see fill locations and pond embankment construction.

Clear provision of all the Borehole information undertaken across the site and by the portal should be submitted, as the groundwater levels on the site are high and fed by a number of springs.

A clear understanding of the Thames Water drainage in the area, i.e. catchment and location of discharge points should be provided, including demonstration that Ickenham Stream diversion does not increase in flows to the River Pinn. The modelling of the River Pinn currently does not include the ordinary watercourse and a detailed understanding of the input flows is required. This should be updated to include an assessment of the risk to property and to understand interactions when this causes backing up on the footpath which floods regularly.

We also need an understanding the new bridge and haulage road across the River Pinn, as this may have impacts of flood risk, both to the main river and ordinary watercourse and footpath Celandine Bridge U53..

The following queries comments should be clarified / addressed:

Please advise whether the Canal feeder bridge be preserved and repaired

Please note that the red line boundary includes residents property on Hill Rise. The Land Registry should be consulted to clarify extent of ownership.

The extent of the River Pinn flooding modelling should inform flooding extents on site.

A clarification of the interface with HS2 Embankment and drainage on site should be provided.

Specific comments on the submitted documentation is provided below:

#### Flood Risk Assessment (FRA)

The FRA should set out relevant information relating to flood risk on the Application Site, demonstrate how any risks have been mitigated, and describe the surface water drainage strategy, also taking into account climate change.

- How will it establish the level of risk?
- What modelling work has been done on the ordinary watercourses in addition to updating the River Pinn model. There is a need to include Ickenham Stream and other groundwater and ordinary watercourse inputs.
- What monitoring of groundwater and ordinary water course flows have been undertaken?
- What Boreholes have been undertaken and where?
- SW strategy - what level of sustainable design will be incorporated?
- The LBH proforma should be completed and submitted with the application.
- Please note that risks are not just on site but from off-site which the site manages.
- You should presume EA standards of climate change.
- The development should improve the situation for residents up stream of golf course and along River Pinn Corridor.

#### Management and Maintenance Plan (MMP)

The MMP should set out how the elements relating to the golf course operation (greens, tees and fairways) and elements relating to the landscape / ecological habitats will be managed and maintained. This should include physical structures, such as culverts and rain water harvesting included across the site. An assessment of the change of the level of maintenance will be required.

#### Details

Any proposals for diversion of the Ickenham Stream will need to show how water is controlled and does not increase the risk to residents, causing concern for public safety as a result of the proposals.

The accessibility issues of flooding near the River Pinn should be solved by the application.

Any proposals will need to take into account the proposed location and need for flood plain compensation for the embankment.

The new River Pinn flooding modelling should inform flooding extents on site, timeframes for that to be finished to input into this application.

An understanding of the interface with HS2 Embankment and drainage and the golf course, we need reassurance that HS2 utilising most sustainable design, not pumps as indicated previously.

Any new alignment of footpaths and drainage infrastructure, including outfalls, land drains, culverts, footbridges and cross sections should be provided in GIS format, to add to the Flood Risk Register.

#### ECOLOGY

The NPPF at para. 170 states inter alia that the planning system should contribute to and enhance the natural and local environment by:  
protecting and enhancing valued landscapes, geological conservation interests and soils;

recognising the wider benefits of ecosystem services;  
minimising impacts on biodiversity and providing net gains in biodiversity.

This central government advice confirms and reinforces relevant policies in the Hillingdon Local Plan and the London Plan (2016).

West Ruislip Golf Course and Old Priory Meadows, a Sites of Borough Importance for Nature Conservation (SBINC) Grade 1, lies over the west and northern and central parts of the site and comprises wildflower-rich meadows, hedgerows, fields and a rich wetland habitat wet grassland and drainage ditches. Mad Field Covert, Railway Mead and the River Pinn SBINC Grade 2 is located approximately 70m to the south of the site.

A full phase one habitat survey will be required and follow detailed studies, where recommended. If significant populations or habitats of nationally or internationally protected species are discovered then the ecology impacts will need full assessment.

Notwithstanding the above comments, it should be noted that the ecological impacts are now the only area considered to result in likely significant effects in the context of environmental impact assessment (EIA). The matter of whether the application is EIA or not is now with the Secretary of State by way of an EIA screening direction.

The treatment of ecology in a subsequent planning application is therefore self evidently linked to whether or not it is a matter to be addressed in an EIA, and by virtue of a scoping exercise; or through the normal planning application route if EIA is not required. Clearly if the matter is of importance to trigger EIA, then the subsequent environmental statement must tackle the issue differently than if it were a non-EIA development.

The Council's position in relation to ecology is therefore dependent on the outcome of the EIA screening direction.

## LAND CONTAMINATION ISSUES

With regard to the proposals to improve the golf course by importing 50,000 m<sup>3</sup> of inert soils, Council records do not appear to include a site investigation for the land. Land at golf courses do not usually have a contaminative use. However with regard to existing land contamination, the Environment Agency may require a remediation strategy, in the event that contamination not previously identified is found to be present at the site. In this case, the site is not marked as land filled, so contamination from land fill is likely to be a low risk. Nevertheless, any future application should include information on the matters below -

1. A ground investigation, to clarify whether or not the site is tipped is necessary. This would also enable the soil structure and ground water regime to be clarified.
2. The full details on how the tipping by the developer will be supervised and monitored
3. A construction and environmental management and plan. The site is next to many residential houses and the tipping of 50,000 m<sup>3</sup> will pose many potential nuisance problems from noise and dust (as detailed below).
4. An indication of where the soil will be sourced from and what sampling including chemical tests will be in place to check the quality.

You are advised to contact the Environment Agency and the Council's Environmental Protection Unit to discuss the scope of these reports.

## SUSTAINABILITY

Applicants are advised to consult the Mayor's Supplementary Planning Guidance on Sustainable Design and Construction (available at [http://www.london.gov.uk/mayor/strategies/sds/sustainable\\_design.jsp](http://www.london.gov.uk/mayor/strategies/sds/sustainable_design.jsp)) to assist in achieving

a sustainable development.

## FOOTPATHS

Although rights of way matters are usually dealt with by the Local Highways Authority, Local Planning Authorities have been granted powers by Section 257 of the Town and Country Planning Act 1990 (the 'Act') to make Public Path Orders for the diversion or stopping-up of footpaths, bridleways or restricted byways.

This type of application can only be made however where the Local Planning Authority is satisfied that the diversion/stopping-up is necessary to enable development to be carried out in accordance with a planning permission.

The Growth and Infrastructure Act 2013 also amended section 257 of the Act to allow an diversion/stopping-up Order to be made before planning permission has been granted provided a planning application has been submitted. Please note that an Order cannot be confirmed however, until such time as planning permission has been granted.

The grant of planning permission does not entitle developers to obstruct a public right of way. The diversion or stopping up of footpaths, bridleways and restricted byways is a separate process which must be carried out before the paths are affected by the development. It cannot be assumed that because planning permission has been granted that an Order under section

257 will invariably be made or confirmed. Development, in so far as it affects a right of way, must not be started and the right of way should be kept open for public use, unless or until the necessary order has come into effect.

## MoD SAFEGUARDING

The site is located close to RAF Northolt. The MoD may have concerns regarding heights of supporting towers for the proposed fencing and materials. You are advised to seek early contact to discuss height restrictions.

## 6. Planning Obligation and CIL (Mayor and LBH)

### S106 PLANNING OBLIGATIONS

Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), requires that where developments generate the need for additional facilities, financial contributions will be sought.

The proposed development is likely to generate requirements for planning obligations in respect of:

\* A financial bond to cover the cost of any unfinished works

The land restoration will ensure an adequate level of security is available. It is considered necessary to make the development acceptable in planning terms and is directly related to the scheme. In the absence of such a bond, it is suggested that the scheme would represent an unacceptable risk to the visual amenity and openness of the Green Belt as well as to the ecological value of the site, contrary to relevant national, London Plan and Local Plan Part 2 'saved' UDP policies EC2, OL1, OL2 and R17.

It is considered that such a bond would be reasonable in the circumstances that apply here and would represent no more than common practice in the context of construction projects. The bond would be necessary either to enable the Council to ensure completion of the works were HS2 to fail as an organisation or to implement the scheme incorrectly, or it would be required to provide for the restoration of the site to its current condition were the

implementation of the scheme to raise serious problems in relation to visual amenities or nature conservation. A failure to complete the proposed works adequately could well have very serious consequences for the landscape and for the important nature conservation interests here. The provision of an appropriate bond would provide a mechanism to address the consequences of such failure.

A costing exercise will need to be carried out to determine the size of the bond.

#### COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal building floor area of 100m<sup>2</sup> or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £35 (+ TPI) per square metre. The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014. Should you require further information please refer to the Council's Website [www.hillingdon.gov.uk/index.jsp?articleid=24738](http://www.hillingdon.gov.uk/index.jsp?articleid=24738)

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme.

#### 7. Application Submission

A summary of the plans and reports required to accompany any future application are provided below:

Draft materials management plan (MMP)

Surveys required:

Surveys should include a tree report to BS5837:2012, which should include clear plans showing trees to be retained and those to be removed, together with tree protection and an Arboricultural Method Statement and an ecological survey.

Application drawings / information to be submitted

- Topographic survey existing and proposed
- Full details of topsoil strip and storage
- Topsoil analysis.
- Full details of spoil analysis of the 50,000m<sup>3</sup> for use as fill
- Spoil / subsoil analysis.
- Graphical demonstration of the existing and proposed elevations with cut and fill depths.
- 'As-built' topographical survey on completion of the project.
- Monitoring / management of materials
- Typical cross-sections across the whole site at an appropriate scale.
- Typical cross-sections showing the construction of greens and drainage at an appropriate scale.
- Clear plans required to explain areas of cut or fill to help visualize
- 'retained', 'existing' / 'to be removed' and 'proposed' tree planting
- Landscape masterplan.
- Full hard and soft landscape details.
- Planting plans.
- Planting schedules.

- Planting specification.
- Management and maintenance specification.
- Details of a financial bond to cover the cost of any unfinished works.
- Confirmation about the construction programme and stages
- Confirmation about the management / maintenance responsibilities and the hand-over arrangements (in 2024?)

- Planning Statement to include:
  - o This document should include a description of the site, an explanation of the rationale behind the proposed upgrade of the facilities, details of the proposed remodelling work, landscape design and construction details.
  - o Green Belt Justification (& potentially waste justification depending on fill material)
  - o Additional details of the proposal are required; including: The volume and nature of fill material required for the remodelling works (including top soil, sand dressing etc)
  - o Landscape design and construction details (including green construction)
  - o Drainage details
  - o Impact Statement, describing the effects on the land.
- Full Ground Assessment (Contamination including full hydrological studies)
- A land contamination report will be required, as this may be a site sensitive for ground water.
- Flood Risk Assessment, including full drainage details
- Visual Appraisal

The report should describe the proposed re-modelling and consider the visual effects from key view points around the site (including adjacent residential development). View points from outside the site should be considered in particular.

- Ecological Assessment

The assessment should include any biodiversity enhancements resulting from the development. A Phase 1 habitat survey should be submitted to address wider ecological issues. (However see comments regarding potential EIA status).

- Arboricultural Implications Assessment

The report's objectives should be to inspect significant trees on and close by to the site and to provide advice on the successful retention and incorporation of trees of amenity value. Root protection zones should be specified and indicative tree protection measures provided. An implications assessment should be included.

## Drainage Plans

- Drainage Plans 1:1250 or 1:2500, including ditches, channel flow, open water, other drainage channels, finished contours.
- These should include long sections through the site and along ditches
- Before and after cross sections at regular intervals, showing cross section capacity maintained.
- Existing and proposed contours 1:1250 or 1:2500. This could be colour coded to show elevation changes.
- Show location of new retention features.
- Details of how the embankments are constructed.
- Full Details of finished levels and landscaping

- Air Quality Assessment
- Noise Assessment (Including rifle range)
- Transport Assessment (Including construction management arrangements)
- Environmental Construction Management Plan (CEMP)

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

The plan should include the following:

- (a) Details of the soil quality of the imported material (Soil Import Values)
- (b) Quality protocol involving a pre authorisation and post delivery process as follows;

#### Pre- Authorisation

The Characterisation of the material will be carried out prior to the delivery to site to include but not be limited to the following;

- Source and origin of the import material with associated evidence such as Site Investigation reports, Soil Analysis/Testing Certificates, previous site history etc. will be obtained and verified that it is suitable for use.
- The process producing the imported material e.g. bulk excavation and location of soils relevant to existing reports.
- The Composition of the import material
- Volume and dates the material is expected from the Producer/Donor site.
- Visit(s) to the Producer/Donor site to inspect material as required to assess the appearance of the import material (including its smell, colour, consistency and physical form).
- Confirmation of the Waste Carrier and the Waste Carrier licence details (if applicable)
- Verification that source material meets agreed Soil Import Values
- Details on the agreed delivery routes, delivery times.

#### Post-Delivery

All loads to arrive sheeted.

- (a) Each load to produce a fully completed and signed waste carriers note with pre-authorisation reference clearly marked.  
3 point individual check of each load of import material to confirm its characteristics (including its smell, colour, consistency and physical form)  
will be carried out at;
  1. Point of entry;
  2. On discharging of load
  3. During the spread and levelling process.

- (b) Carry out representative chemical soil test at the rate of 1 per 500 m<sup>3</sup>  
Visit(s) to the producer site as necessary, during the delivery period.  
A daily log will be kept of each source of material received (by pre-authorisation reference) and cumulative volume received. The location of where each material has been placed will be

logged using a handheld GPS device. The above details will be held on site and on a database for monthly reporting and archiving purposes.

- (c) A final Verification Report will be produced which will be available to the Environment Agency and the Council.
- (d) Details of independent monitoring during the period of importation of material to ensure quantity/type is requisite to that as approved.
- (e) A monthly summary submission of soil source and import information will be made to the Council during the monitoring period.
- (f) Testing certificates and source site investigations to be submitted as soon as possible to the Council
- (g) The monthly submission shall include the source site details including ground investigations and excavated soil testing, all laboratory testing certificates for soil imports, site inspection comments by the environmental consultant or other suitably experienced person, details of any soils removed, and the locations of soil deposition on site that month. The dates of all testing and inspections shall be clearly recorded.
- (h) The final soil verification report referred to in the CEMP shall be submitted to the LPA at the end of the work.
- (i) Monitoring and management of import volumes which shall include as built surveys (based on Ordnance Survey datum) to be carried out monthly. The monthly as built surveys will be compared with the agreed Planning levels to enable any discrepancies to be highlighted and corrected. This will be made available to the LBH on a monthly basis
- (j) Site Operations, including adherence to considerate constructors' scheme, health and safety legislation and approved working hours
- (k) Storage of plant and materials, including a detailed Method Statement clearly identifying correct stripping, soil handling, storage, placement and programming requirements to avoid over compaction and moving the material in unsuitable weather conditions
- (l) Traffic Management
- (m) Access and routes
- (n) Lorry movements
- (o) Environmental control measures to control noise, dust, smoke and particulates

## 8. Conclusion

No objections are raised to the principle of the upgrading of the existing golf course, subject to other policies in the Plan.

However, in order to ascertain whether the proposal is a 'waste' development, the applicant will need to provide a draft materials management plan (MMP), which includes reports based on significant degree of on- site intrusive investigative work of the source material. This MMP will need to demonstrate that the material can be categorised as not waste. If the draft MMP has satisfied the Environment Agency in writing that the material in question is not a waste product, then the Council will validate the subsequent planning application as non waste related. However, should the MMP not successfully demonstrate the proposed

material is non-waste, or there is no formal letter from the Environment Agency, then the Council will proceed as if the application is related to a waste product and will process it accordingly.

It is unlikely that the recontouring of the land would be visible from afar and would not affect the overall character and openness of the Green Belt. However, the proposed development comprises a number of elements such that an assessment of the impacts on the Green Belt will be required, along with a full arboricultural assessment and arboricultural implications assessment (including the impact of the haul road).

There are drainage concerns about the import material 50,000m<sup>3</sup> of fill material. Any application should provide detailed plans, showing sustainable drainage arrangements and calculations, justifying the proposed drainage arrangements in this area. This should include a management and maintenance plan which details who will be responsible for the site, for the future.

A comprehensive Transport Assessment will be required, which should address all of the main transportation aspects of the development as highlighted in this letter, with a clear and holistic narrative explaining how the proposal would satisfactorily marry with all of the HS2 site operations and programmes, to the minimal detriment of the highway network in terms of safety and road capacity.

## 9. Planning Performance Agreement

Central Government encourages the use of PPAs for larger and more complex major planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process. Currently the planning officers carry high workloads and given the importance of your project should you require a dedicated planning resource focusing on your application to ensure it is dealt with as a priority, it is highly recommended that you enter into a PPA, which would involve funding from the developer to allow the Authority to hire an additional planner to act as a dedicated case officer for your proposals.

The key advantage to entering into a PPA is that the Council will have the resources in place to ensure that the application proceeds through the application process in a timely fashion and result in high quality development. Mandip Malhotra is available to discuss the details of a PPA ([mmalhotra@hillingdon.gov.uk](mailto:mmalhotra@hillingdon.gov.uk)), or please do come back to me should you have any queries.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

the applicant would need to address environmental issues, including air quality, noise, drainage, land contamination, waste management, flood risk, highway considerations and ecology.

On the basis of the limited information provided so far, having regard to the above mentioned considerations, it is likely that an application to import 50,000 m<sup>3</sup> of waste to the site would be supported.

You are advised that the development does not represent EIA development. I would reiterate that the comments made in this letter represent officer opinion and cannot be seen to prejudice the Local Planning Authority's formal determination of any planning application.

**Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.**

Thank you for entering into the Council's pre-application advice service and I trust you have found this service of assistance.

**Karl Dafe**  
**Principal Planning Officer**  
**Major Applications Team**  
**London Borough of Hillingdon**

**Planning Guarantee**

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined in a site by site basis.

**Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.**

# Ruislip Golf Course Environment Agency- Minutes

Meeting No NA

Date: 30/08/2018

Invitee: Katie Kerr (DH), Chris Barrett (DH), Nigel Phelps (SCS), Daryl Henehan (HS2), Niall Gibbons (SCS), Tracy Moffatt (SCS), Lucy Gallagher (EA), Mathew Wales (EA), Carl Court (EA), Alistair Brodie (EA), Matt Parr (EA), Peter Johnson (HS2), Alexander Stewart (HS2), Paul Lippett (HS2), Sean Cunniffe (HS2) and Kimberley Royer-Harris (HS2)

Attendees: Katie Kerr (DH), Chris Barrett (DH), Nigel Phelps (SCS (by phone), Daryl Henehan (HS2)(by phone), Tracy Moffatt (SCS)(by phone), Lucy Gallagher (EA), Mathew Wales (EA) and Sean Cunniffe (HS2)(by phone)

Item	Action	By	Status
<b>1.0 Introductions</b>			
<b>2.0 Overview of Ruislip Golf Course application</b>			
<ul style="list-style-type: none"> <li>KK gave a brief overview of the scheme including that it is a Town and Country Planning Act (TCPA) application for a redesigned 9 hole course, with associated facilities. The planning application is due to be submitted in early 2019. The purpose of the meeting is to confirm that the application is not seeking permission for waste development and to agree the approach to reusing materials from the portal.</li> <li>CB described the overall cut and fill balance. The design has been led by DH landscape architects and Gaunt Golf design with the aim of creating an interesting and challenging course. Changes in levels are up to 3.5m. There is a deficit of 50,000m<sup>3</sup> of material to achieve the design ambition.</li> </ul>			
<b>3.0 Nature of material from Portal and suitability for proposed use</b>			
<ul style="list-style-type: none"> <li>CB stated that an initial review of the available draft data from the West Ruislip Portal site has been carried out and shows the excavated material is likely to comprise silty clays of the London Clay Formation and Harwich Formation and Lambeth Group, which is a relatively well graded and variable material comprising gravels, sand, silt and clay. There is only a thin layer of made ground. Approximately 2/3rds of the total material excavated from the Portal would be needed to provide 50,000m<sup>3</sup> for use on the golf course.</li> <li>The geotechnical properties of the material make it acceptable for use as Class 4 landscape fill under the Specification for Highways Works (SHW Series 600) without treatment. Treatment could be necessary depending on the weather conditions at the time of extraction and a specific permit for such treatment could be sought at the time. MW and LG agreed that should treatment be necessary this could be dealt with through an operational permit at the time.</li> </ul>			

- CB noted that geo-environmental testing of the portal material to date indicates that most material is generally good quality uncontaminated soils suitable for most end uses, subject to further testing.
- CB noted that the application site is within SPZ 1 and 2 however there is no shallow aquatic environment which is sensitive.

## 4.0 Materials Management Plan

- CB proposed that excavated material are reused using the CLAIRE Definition of Waste Code of Practice (DoWCoP) approach under a full Materials Management Plan (MMP). MW and LP agreed that this is the most suitable approach.
- CB explained that there are two possible scenarios described in the DoWCoP which might be applied:
  - Reuse on site of origin
  - Direct use of clean naturally occurring soil on another site (direct transfer).
- CB also suggested that based on the existing geo environmental data it seems that it would be appropriate to present an MMP based on "Route B" i.e. accompanied by a design statement backed up by the existing and proposed investigations, and a risk assessment showing the soils are suitable for use.
- MW and LP agreed that the direct transfer route is the most appropriate and that "Route B" is appropriate.
- There was some discussion as to whether material to be cut and filled from within the application site should be included in the same MMP and it was agreed that the MMP could cover the combination of this and the imported material.
- LG queried the length of time that the MMP would allow materials to be stockpiled and MW confirmed that under the DoWCoP materials can be stored for longer than a year if subject to annual reviews.
- LG noted that if the volume of material increased from 50,000m<sup>3</sup> the volume over and above this could be classified as waste and subject to landfill tax.

## 5.0 Next steps

<ul style="list-style-type: none"><li>It was agreed that the technical note DH had prepared to inform discussions would be updated and circulated to MW and LG.</li></ul>	Update technical note	CB/KK	
<ul style="list-style-type: none"><li>Upon receipt MW and LG will provide a written response which confirms that the application should not be considered as waste development and sets out the agreed approach to reusing materials from the portal under an MMP. This response can be submitted to the London Borough of Hillingdon as part of the TCPA.</li></ul>	Respond to technical note	MW/LG	
<ul style="list-style-type: none"><li>It was agreed that KK would keep MW up to date with the progress of the TCPA so that he can liaise with the EA area team as appropriate.</li></ul>	Keep EA updated on TCPA	KK	

Document title: Materials Management Plan - Ruislip Golf Course S2

Document no.: 1MCo4-SCJ\_SDH-EV-PLN-SS05\_SLo7-000002

Revision: Co3

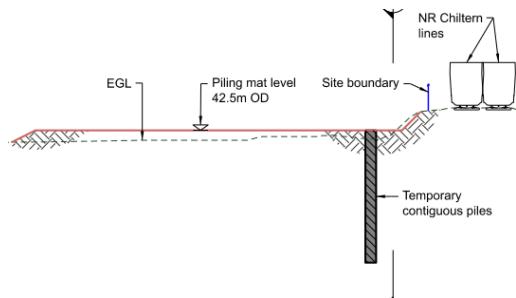
## Appendix B – Material tracking and verification

## West Ruislip Portal Excavation

West Ruislip Portal is the approach and departure structure for the High Speed train access into the twin driven (bored) Northolt Tunnels, it is also the launch structure and infrastructure support for the 2 No Tunnel Boring Machines (TBM's) for their journey South toward Euston.

Prior to work commencing a semi permanent haul road is to be constructed on the North side of the portal works this will serve as access to the rest of the West Ruislip works and service WRP operations.

The portal area will be topsoil stripped and the topsoil stored on the perimeter of golf driving range, the golf driving range areas will be stripped under the storage areas sequentially, as required by the operation in the portal. The topsoil will be stripped and loaded using 20t excavators with ditching bucket attachment the material will then be transported using 25t articulated dumptrucks (ADT's) along the access haul road to the driving range as detailed on sketch 1MC04-SCJ-CL-DMA-SS05\_SL07-480200 WRP.

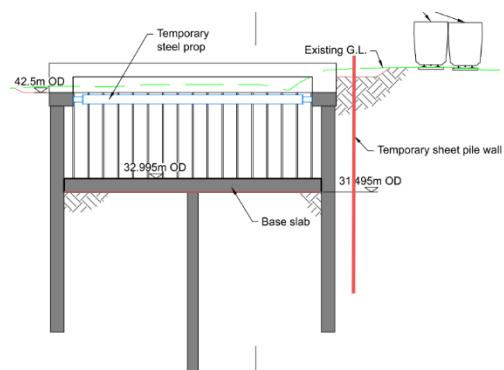


After topsoil has been removed the area of sheet piling adjacent to the Chiltern Rail line will be levelled out and a temporary access haul road and piling mat will be installed, using recycled 6F5 (if available) to access the area of sheet piling and to facilitate a solid foundation for the sheet piling equipment.

Once the sheet pile wall is installed, excavation operations will continue down to the top of capping beam level, depth varies below existing ground, this material will be stockpiled on the golf driving range, a further temporary piling mat will be installed. Contiguous bored piling operations will commence, piling arisings will be temporarily stockpiled, if testing is required. The stockpiles will be removed from site to a licensed landfill facility using 20t road wagons, a tracking system will be utilised to capture volume of excavated off site material. The piling arisings will not remain on site.

Once piling operations have been complete, a concrete capping beam will be cast to tie the contiguous bored piles together.

The main excavation operations will commence within the piled box, the initial excavation will be the launch location working up chainage from circa 23615 to 23920, this excavation will reduce the area down to underside of the temporary propping beams that are to be located within the launch box. Material excavated will be tracked using the tracking Material Tracking Document - MTD (Rev 3), in conjunction with the tracking drawing 1MC04-SCJ-CL-DGA-SS05\_SL07-480503, stockpiles will be identified alpha numerically.



The bulk excavation operation will then proceed up chainage from approx. 23666, taking the area down to formation level, whilst the temporary propping beams in the launch box are installed.

On completion of the propping beams a smaller excavation operation will remove material from beneath the temporary propping beams within the launch box area.

SCS have estimated the total quantity of excavated material, excluding piling arisings, that will be removed from the West Ruislip Portal to be Circa 50,000m<sup>3</sup> of which all should be suitable for reuse within the golf course area. However, there is the possibility of a small amount of a silty alluvium, which subject to classification and chemical testing maybe required to be removed from site to a licensed landfill site.

Due to the shallow TBM launch there is a requirement for the tunneling operation to protect the tunnel soffit both during launch and on a permanent basis with an overburden, this will require importing 38,000m<sup>3</sup> of a class 9D material from Copthall cutting works and place it in the area directly down chainage from the launch box approx. 23520 to 23630

