

# 1MCo4 Main Works - Contract Lot S2

## Planning Statement - Ruislip Golf Course S2

MDL Code:

Document no.: 1MCo4-SCJ-PL-STA-SS05\_SL07-000001

Revision	Author	Checked by	Approved by		Date approved	Reason for revision
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**SECURITY CLASSIFICATION: OFFICIAL**

**Handling instructions:** None

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# 1 Introduction

## 1.1 Background to the proposed development

- 1.1.1 This Planning Statement is 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.
- 1.1.2 Ruislip Golf Course is a municipal golf course, owned and operated by the London Borough of Hillingdon (LB Hillingdon). It falls partially within the alignment of the HS2 development. The High Speed Rail (London-West Midlands) Act 2017 (the HS2 Act), which gained Royal Assent in February 2017, conferred the necessary powers required to construct Phase One of the railway from London Euston to Birmingham Curzon Street. The southern part of Ruislip Golf Course falls within this boundary.
- 1.1.3 Construction of HS2 will result in land take from Ruislip Golf Course. The applicant has committed to designing and delivering a reconfigured golf course and replacement rifle range facility as part of a number of Undertakings and Assurances (U&A) that were agreed with LB Hillingdon (and which eventually formed part of the Hillingdon Agreement) during the passage of the Hybrid Bill through parliament.

## 1.2 Route to consent

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

## 1.3 Site location

- 1.3.1 The application site is in west London within LB Hillingdon. The application site comprises the majority of the existing, albeit now closed, golf course, the area of which is 36 hectares. This area excludes the southern part of Ruislip Golf Course, which will be acquired as part of the HS2 works. LB Hillingdon's property department has confirmed that all land within the redline boundary is owned by LB Hillingdon and there are no other land interests within the site.
- 1.3.2 It is located to the north of West Ruislip Station, and is bounded: to the north and north-east by the Glenhurst Avenue allotments and Hill Lane playground and the rear curtilages of residential properties on Field Way and Hill Rise; to the east and south-east by the rear curtilages of residential properties on Sharps Lane, Ickenham Road and Harwell Close; to the south-west and the far south-east by the boundary of the HS2 development; and to the west and north-west by the River Pinn.

## 1.4 Description of development

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

1.4.2 The description of development is as follows:

1.4.3 *Full application for remodelling of Ruislip Golf Course, incorporating: reconfiguration of 18 existing hole course into a nine hole course, short game practice area, putting green and six hole academy course; construction of a single storey rifle range; demolition of existing covered driving bays and construction of replacement 20 bay driving range, including associated floodlights and safety netting; a new drainage system and associated ponds; ecological and landscaping works; realignment and enhancement of the Hillingdon Trail and creation of a new public footpath; excavation of a new channel for the Ickenham Stream (canal feeder); and other associated works.*

## 1.5 The Applicant

1.5.1 The applicant is High Speed Two Ltd.

## 1.6 Structure of the Application

1.6.1 This Planning Statement sits alongside a suite of documents which support the application submission. These are listed in Table 1 below:

Document Ref	Document / Plans	Details
1MCo4-SCJ-PL-FRM-SS05_SL07-000001	Planning application form and certificate	Application form for full planning permission. Ownership certificate.
1MCo4-SCJ-PL-STA-SS05_SL07-000001	Planning Statement	Includes project description, site description, project rationale, assessment of how the development complies with local, regional and national planning policy, summary of consultation undertaken, and description of other documents which constitute the application.
1MCo4-SCJ-PL-STA-SS05_SL07-000002	Design and Access Statement (DAS)	Includes design principles and concept, description of the proposed development, context appraisal and approach to access.
1MCo4-SCJ-EV-STA-SS05_SL07-000002	Ecological Impact Assessment (EIA)	Includes current ecological constraints, a preliminary ecological appraisal and details of how construction and operation will seek to protect existing ecology.

1MCo4-SCJ-EV-REP-SS05_SL07-000008	Archaeological Desk Based Assessment	An assessment of the archaeological potential of the application site and potential impacts of the proposed development.
1MCo4-SCJ-EV-REP-SS05_SL07-000006	Geoenvironmental Desktop Study Report	An assessment of the ground conditions in relation to the proposed development.
1MCo4-SCJ-DR-ASM-SS05_SL07-000001	Flood Risk Assessment (FRA)	Sets out relevant information relating to flood risk on the application site and demonstrates how any risks have been mitigated.
1MCo4-SCJ-DR-REP-SS05_SL07-000003	Drainage Report	Describes the surface water drainage strategy.
1MCo4-SCJ-OM-PLN-SS05_SL07-000001	Management and Maintenance Plan	Sets 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.
1MCo4-SCJ-TM-STA-SS05_SL07-000001	Transport Statement	Describes the proposed highway and access arrangements relating to the proposed development, during both construction and operation, considers the impact of the proposals on the local transport network and outlines measures necessary to address any impacts.
1MCo3-SCJ-EN-ASM-SS05_SL07-000001	Noise Impact Assessment	Establishes the effect of the proposed development on noise levels in the surrounding area.
	Outline Materials Management Plan	Describes the approach to importing materials to the site, providing sufficient information to satisfy CL:AIRE DoWCoP.
1MCo4-SCJ-EV-REP-SS05_SL07-000009	Arboricultural Survey Report	Produced in compliance with National Code of Practice: <i>BS5837:2012 Trees in relation to design, demolition and construction - Recommendations</i> . Includes a tree survey and arboricultural assessment.

Table 1 Planning application documents

1.6.2 The application is also supported by a range of drawings, plans and cross-sections, a comprehensive list of which is provided in Appendix A.

## 1.7 Purpose of this document

1.7.1 The Planning Statement sets out the planning policy context for the project and assesses the planning issues surrounding the application in light of relevant policy and guidance at the national, regional and local levels. It is structured as follows:

- Chapter 1: introduces the Planning Statement and the project;
- Chapter 2: provides a detailed description of the application site, its planning history and the surrounding area, including summarising the effect of the HS2 development;
- Chapter 3: provides an description of the development proposal;
- Chapter 4: summarises engagement on the proposal;
- Chapter 5: summarises the socio-economic aspects of the proposal;
- Chapter 6: explains the planning policy context and the case for development;
- Chapter 7: presents the conclusions.

## 2 The Site and its Surroundings

### 2.1 Site Location and Description

2.1.1 Ruislip Golf Course covers an area of approximately 42 hectares and is located in LB Hillingdon, immediately to the north of West Ruislip station and approximately 600m to the west of Ruislip High Street. The application site comprises the majority of the existing golf course, the area of which is 36 hectares. The remaining six hectares of the Golf Course that are excluded from this application will be acquired and used for permanent elements of the HS2 railway.

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

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

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

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

2.1.6 A club house building, is located in the south-eastern part of the Golf Course outside of the application site. This building comprises the Fairway public house (operated by Greene King), changing rooms, golf equipment shop and trolley hire. A surfaced car park approximately

3,736sqm in size is located to the north of the club house and is included within the application boundary. It should be noted that whilst the golf course itself is now closed, this building remains open and operational.

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

## 2.2 Site Surroundings and Context

2.2.1 The eastern parts of the application site are set within an urban, largely residential context, with the western part opening out to the wider countryside.

2.2.2 The northern quadrant of the application site, is closely bounded by the allotments, Hill Lane Park, and the backs of residential properties on Hill Rise, Sharps Lane and Ickenham Road, as well as a social club and a church. Ruislip High Street is located some 600m to the east.

2.2.3 Ickenham Road, a local distributor road, is located to the south of the site. In its southernmost part, Ickenham Road crosses the Chiltern Mainline on a flyover, which also provides elevated views over the existing car park, club house and driving range within the site. West Ruislip London Underground / National Rail station is located immediately to the east of Ickenham Road, with access via the station building on the eastern side of the overbridge.

2.2.4 The Chiltern Mainline is set in a densely vegetated corridor along the south-western edge of the existing golf course, providing a significant visual buffer from residential properties on The Greenway and Ickenham Green beyond. The railway is more visually prominent in the westernmost part of the golf course, where it rises up on an embankment before crossing a viaduct over the River Pinn and Celandine Route.

2.2.5 Beyond the River Pinn, which forms the western and north-western boundary of the application site, the site gives way to scattered detached residential dwellings on Tile Kiln Lane and Old Priory, interspersed amongst scrubland and open paddock and pastoral fields. The Colne Valley Regional Park lies approximately 150m to the west of the application site, to the west of Breakspear Road South.

## 2.3 Site History

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

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

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

## 2.4 Effect of the HS2 development

2.4.1 Phase One of HS2 is the first phase of a new high speed railway network proposed by the Government to connect major cities in Britain. It will provide dedicated high speed rail services between London, Birmingham and the West Midlands, extending for approximately 230km.

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

2.4.3 Adjacent to the southern edge of the Ruislip Golf Course, parallel to the existing Chiltern Main Line is the site of the proposed HS2 scheme. The scheme comes out of tunnel in a porous portal, which is proposed to be located on the south eastern corner of the golf course. The portal structure extends west from the headhouse running parallel to the Chiltern Mainline for 250m before the trains emerge above ground in a retained cutting. The rail corridor raises up onto a planted embankment before bridging over the River Pinn and Breakspear Road South.

2.4.4 The HS2 proposals include ecological and landscape screening particularly along the northern edge of the railway that will reinstate the wooded edge of the golf course and create a buffer between the course and the railway corridor. An area of ecological mitigation is proposed adjacent to the golf course, south of the driving range, which provides cumulative mitigation and replacement for the habitat lost during the construction of the scheme. Details relating to this will be included in the Schedule 17 Plans and Specifications application submitted under the HS2 Act.

2.4.5 As a result of this required buffer, alongside the requirement to apply "industry-accepted" safety margins to the HS2 works boundary, there would have been a direct effect to and encroachment of the southern perimeter of the existing golf course. The practice nets, the putting green, holes #1 (tee and fairway), #2 (tee, fairway and green), #3 (tee) and the rifle range would have been affected by the HS2 works; with holes #15, #17, #18 and the driving range affected by works involving a Thames Water Utilities diversion (outside the scope of this application) and a proposed area of ecological mitigation land. The existing Ruislip Rifle Club facility has therefore been demolished as part of these works.

2.4.6 For more than 20 years, a safety margin of 60m has been referred to and applied to new golf course designs and layouts by members of the European Institute of Golf Course Architects and other golf course architects. The 60m safety margin measurement is not a planning requirement, but it is widely recognised by the golfing community.

2.4.7 When the 60m safety margin is applied to the already required buffer (measured from the proposed railway construction boundary – not from the centre line of the proposed railway line), hole #1 (green), hole #14 (green) and hole #15 (tee) would also have been affected.

2.4.8 Accordingly, the HS2 works and required mitigation would result in substantial usability issues for the existing golf course should it have remained open and operational. The applicant has therefore committed to redesigning and delivering Ruislip Golf Course so as to be compatible with the HS2 works, as part of the U&As set out in the Hillingdon Agreement (17 August 2017) recorded in HS2 Ltd.'s register of Undertakings and Assurances as U&A ref 2832\_15.

2.4.9 Gaunt Golf Design were appointed to develop options for the reconfiguration of the golf course and Option 3 was chosen by LB Hillingdon as the preferred option. This option was subsequently updated and renamed Masterplan Option 3A as set out in the *Design report on the effect of HS2 Railway Line upon the golf course and practice facilities at Ruislip Golf Course* produced by Gaunt Golf Design. The Hillingdon Agreement requires that the design of the reconfigured scheme is based on this option and as such it has formed the starting point for the design.

## 3 The proposed development

### 3.1 Overview of proposed development

3.1.1 The development will comprise:

- nine hole golf course, incorporating greens, fairways, bunkers, short game practice area, practice area outfield and putting green;
- six hole academy course;
- construction of a single storey rifle range to replace the facility recently demolished beyond the application site;
- demolition of existing covered driving bays and construction of replacement 20 bay floodlit driving range, including associated floodlights and safety netting;
- excavation of a new channel for the Ickenham Stream (canal feeder), excavation of new irrigation channels, and development of new water features, including ponds and lagoons;
- installation of oil separators in selected drain outlets and associated resurfacing works;
- tree felling to facilitate realignment of the golf course;
- landscape works to the 'out of play' areas, incorporating replacement native woodland plantations, rough grass and scrub; and
- realignment and resurfacing of the Hillingdon Trail (footpath U81) and the provision of a new public footpath running east-west (partially within the HS2 works boundary).

3.1.2 The development does not seek permission for works relating to:

- the existing club house, including pro shop and the Fairway public house;
- the demolition of the existing Rifle Range building; or
- the existing access onto Clacks Lane / Ickenham Road.

### 3.2 Case for Golf Course Development

3.2.1 Golf is the fifth biggest participation sport in England<sup>1</sup> and *Growing the Game of Golf in England, The Strategic Plan* (England Golf, 2017) recognises that there is lots of potential for participation to increase further. The Plan sets out strategic objectives for England Golf including to help clubs become more resilient and responsive to customer needs; and increase

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<sup>1</sup> England Golf (2017) Growing the Game of Golf in England, The Strategic Plan 2017/21

the number of players. It aims to reach more new players, particularly women and girls, and retain more existing players.

3.2.2 Once redeveloped Ruislip Golf Course will continue to operate on a 'Pay and Play' basis and be open to all without restriction. The course will also continue to offer membership.

3.2.3 The ages and abilities of existing users is wide ranging, and this is expected to be the case in the redeveloped course. The practice areas and academy will enable the course to be even more accessible to young and beginner golfers. The cost of playing will be set by Golf Hillingdon but is expected to remain significantly less than private members clubs. Overall the redevelopment will provide an accessible route into the sport in line with England Golf's ambitions, and more generally of national, regional and local planning policy which aims to encourage participation in sport.

### **3.3 The Detailed Scheme**

#### *Golf Course*

3.3.1 A full description of the scheme is set out in the Design and Access Statement. The new layout has been informed by the location of the most valuable habitats on site, as well as the realigned Ickenham Stream which will meander through the course. The layout has also been informed by the need to provide a 60m safety margin from the boundary of the new railway. The course design seeks to retain the original open character and challenge of the existing course as much as possible.

3.3.2 The nine hole course is designed to provide a replacement facility that is equivalent (if played twice) to what already existed prior to its closure. The nine hole golf course layout will be of "competition" standard (for handicapping purposes) should Golf Hillingdon as operators choose to enable competitions to be held on the course. Its total length would be 2,802m (from Black tees), Par 35. Four teeing positions will be provided on each hole, to make the challenge different when playing two circuits (2 x 9 holes). The multiple teeing positions will cater for golfers of all handicaps – from scratch (0) through to 56, depending upon the skill level and ability. Tee designations proposed are similar to those used in the ski industry – expert, intermediate, learner and beginner – each of which is colour coded for easy identification. Golfers will be able to choose which colour tee they play when signing in at the Pro Shop.

3.3.3 The six hole academy course will be designed primarily for less experienced golfers who want to practice before moving onto the nine hole course. It is also anticipated that it would be used by more experienced golfers looking to improve their "short game" pitching and chipping. It would be a Par 3 course and 508m in total.

3.3.4 The practice and training facilities, putting green, short game practice area and 20 bay driving range, will all be designed to encourage golfers to improve their game. These facilities can be

used by teaching professionals to give coaching lessons to individuals and groups, teaching golf skills and rules of the game.

### *Driving Range*

3.3.5 A new driving range with a built footprint of 671.3sqm is proposed. Circa 5sqm smaller than the existing facility, this will have 20 standard 3m wide driving bays and one 4.5m wide teaching bay, along with an indoor golf studio. The driving range will replace the existing 40 bay driving range with a modern facility. The provision of 20 replacement bays rather than 40 was as a result of the space constraints now present on the site due to the HS2 land take. Following discussions with LB Hillingdon however, it was further confirmed that currently the 40 existing bays are not fully utilised. The specification of the new building has therefore been devised in response – the provision of fewer bays which themselves are wider, deeper and higher, in order to provide a more spacious feeling for users and encourage a more family-oriented use.

3.3.6 Bays in the proposed facility are divided into two areas: a ball hitting area and a social/seating area. A walkway is provided behind the social area. Golfers will be able to relax in the seating area and consume food and drink. It will allow up to four users to occupy a bay and rotate use.

3.3.7 Ball stop fencing will be provided around the driving range. This is essential to stop uncontrolled and erratic shots from leaving the outfield and endangering other golfers and members of the public.

3.3.8 The proposed driving range outfield will have a length of 280m and a width of 66m at the bay end, extending to 90m at the far end. There are no official guidelines on how high a ball stop fence should be. Golf balls and range balls, when hit correctly from a tee, will reach their maximum height at about two thirds the length of their carry. Therefore, the maximum height will be reached at a distance of 180m. The highest part of the ball stop fence will therefore be at this distance.

3.3.9 Driving ranges always use range balls which will have a maximum 90 per cent ball compression rate or less which means they will travel approximately 10 per cent less distance in length and height. The PGA Tour Averages<sup>2</sup>, included in Appendix B, identify that the maximum height of a ball hit with a driver is 29m high. Applying a 10 per cent reduction means that the maximum height for a range ball would typically be 26m. The maximum height for the ball stop fence has therefore been set at 30m in order to catch all likely balls, even those from expected and extreme strikes.

3.3.10 The ball stop fence will be 20m high next to the bays, rising to 30m at a distance of 150m along the outfield, then decreasing to 20m at the rear end. The rear fence will be 20m.

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<sup>2</sup> Trackman (2015) PGA Tour Averages. Available online: <https://blog.trackmangolf.com/trackman-average-tour-stats/>

3.3.11 The new driving range will incorporate a ground mounted berm lighting solution, providing multiple lighting points at up to 1m above ground along the full length of the outfield. This will deliver the necessary vertical lighting levels needed to allow golfers to view the ball in the air. In addition, it is also proposed that seven floodlights are mounted on the range roof to illuminate the first 25m of the outfield.

3.3.12 Further information on the driving range is set out in the Concept Design Note for the driving range in Appendix B.

### *Rifle Range*

3.3.13 A rifle range is proposed as part of the application to replace the existing building which, beyond the application site, has already been demolished as part of the early HS2 development works. This will be located approximately 60m to the east of the existing building, approximately 30m to the north-west of the club house. Permission for the new rifle range was originally going to be sought by Ruislip Rifle Club themselves though it has been incorporated into this application at the request of LB Hillingdon.

3.3.14 A single storey brick building and separate plant room with a combined built footprint of 205sqm is proposed, which would provide a functional, modern replacement for the existing facility. The proposed building has been designed to meet the operational needs of the Rifle Club whilst also adhering to the safety and design standards set out in the *National Small-bore Rifle Association (NSRA) Design, Construction and Maintenance of Target Shooting Ranges advice note*<sup>3</sup>. Accordingly, it incorporates a .22 long rifle range, magazine, washing and kitchen area, as well as associated plant room, ventilation infrastructure and toilet facilities.

3.3.15 The building has been sited to maintain easy access from the existing car parking, and to provide an access route for emergency vehicles which complies with building regulations. Proposed woodland and understorey planting to the north, east and west of the building will provide seclusion and screen views from the surrounding golf course and public footpath.

3.3.16 A Noise Impact Assessment forms part of this application which demonstrates that the development would not cause harm to nearby residential occupiers in terms of noise.

### *Landscaping and Habitat Enhancement*

3.3.17 The proposed development incorporates measures which promote ecological diversity and the integration of biodiversity. Existing habitats have been retained wherever possible and new landscape and ecological connections will be established between habitats.

3.3.18 The planting palette has been selected to build on the characteristics of the site and contribute to the biodiversity and local distinctiveness. It comprises of species chosen to:

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<sup>3</sup> NSRA (2016) National Governing Body Advice on the Design, Construction and Maintenance of Target Shooting Ranges (5<sup>th</sup> ed.).

- enhance biodiversity and align with the proposed ecological corridors;
- reflect existing species on site and integrate with site character;
- align with future maintenance requirements; and
- be compatible with the playability of the golf course (for example, white flowering plants are restricted within play areas so as not to impede finding golf balls during play).

3.3.19 Trees and soft landscape form a fundamental part of the proposed design, enhancing a sense of place and local distinctiveness while offering seasonal character and promoting ecology and integration of biodiversity.

3.3.20 The ecological habitat value of trees was identified, and the design has sought to conserve the most valuable trees. There are a number of Tree Preservation Orders (TPO) within the site; these are predominantly located at the red line boundary adjacent to the proposed academy course. The landscape proposals will not affect any TPOs. The location of trees to be retained has subsequently informed the topographic design.

3.3.21 Further detail on the landscaping and ecological proposals for the proposed development are set out in the Design and Access Statement.

### *Public Footpaths*

3.3.22 Several public footpaths cross the application site. The Celandine Route runs roughly around the western and northern edge of the course along the River Pinn. This route is not affected by this application.

3.3.23 The Hillingdon Trail (U81) currently runs in a north-south direction across the centre of the golf course through a fairway, crossing the Chiltern Mainline tracks via a tunnel to the south. As part of the HS2 development a new route for the Hillingdon Trail is proposed. The realigned route is located partially within this application boundary and partially within the limits of the HS2 Act.

3.3.24 The realigned route for the Hillingdon Trail is being determined by HS2. The realigned route will either enter the application site from Ickenham Road close to the club house or from the southern boundary close to the existing entry point. The proposed realignment within this application is compatible with both options. Should the realignment enter the application site close to the club house it would travel in a westerly direction to the south of the rifle range where it would leave the application site and cross an area within the limits of the HS2 Act. It would re-enter the application site at the western edge of the driving range from where it continues in a generally northern direction before connecting to Clacks Lane. Should the route enter the application on the southern boundary, it would do so close to the western edge of the driving range and follow the same alignment from here.

3.3.25 The proposed route does not directly cross a fairway to improve safety. The Hillingdon Trail will be resurfaced with self-binding gravel, or similar, and wayfinding improved. Wayfinding will be provided in accordance with LB Hillingdon's Wayfinding Strategy.

3.3.26 A new public footpath is also proposed along the southern boundary of the application site. Where the Hillingdon Trail turns to the north at the western edge of the driving range, the new footpath will continue westwards until it meets the Celandine Route in the south-west corner of the application site.

3.3.27 A circuitous footpath connecting all holes around the golf course is also provided to enhance accessibility.

### *Waterways and Waterbodies*

3.3.28 The Ickenham Stream, which passes through the application site, is a former canal feeder. The stream provides some drainage capacity for the golf course, but due to the overall topography of the application site currently plays a very limited role. The Ickenham Stream is being stopped up to the south of the application site as part of the HS2 works.

3.3.29 As part of the proposed development the Ickenham Stream will be realigned to ensure it functions more effectively in the context of surrounding topography, providing an ecological swale feature for the golf course. It will serve three important functions in the context of the course: as an attractive landscape feature, adding to the overall landscape interest of the application site; as a water hazard, adding to the overall challenge of the course; and as a drainage feature, ensuring the year-round playability of the course.

3.3.30 The realigned watercourse will pass between the proposed holes 1, 5, 6, 7, connecting to a series of lagoons and wetland areas. These areas will, in turn, be connected by serpentine ditches. They provide valuable opportunities for habitat creation, supporting the overarching principle of biodiversity enhancement which runs through the proposed development.

3.3.31 Three ponds will be created in the east of the application site which will form part of the water harvesting system for the golf course (see Sustainability). To ensure the future safe operation of ride-on mowing vehicles around the golf course, the banks of the ponds have been restricted to a maximum gradient of 25 per cent and the design also incorporates safety shelves.

3.3.32 It is important to note that there will be additional watercourse consents required in this area as a result of the HS2 works. These will include:

- HS2 Act, Schedule 33, Part 5 – River Pinn flood storage compensation area;
- HS2 Act, Schedule 33, Part 5 – Temporary diversion of Ickenham Stream Diversion (required as a result of the construction compound for the portal and associated works); and

- Land Drainage Act, Section 23 - Permanent Ickenham Stream Diversion (through redesigned Ruislip Golf Course).

## *Drainage and Flood Risk*

3.3.33 A surface water drainage scheme is proposed which discharges into the River Pinn as it does currently. The drainage network will reduce the current runoff flow rates to the River Pinn. The 1 in 100 rainfall event plus 40 per cent climate change is attenuated to the Greenfield rates. The attenuation is achieved providing additional volume in the water harvesting ponds and tanks.

3.3.34 The drainage system will collect water and store it in three underground storage tanks and three ponds. The tanks and ponds are connected to a pumping station which supplies the water for the irrigation system. The irrigation needs of the application site are entirely met by drained water which is collected and stored on site.

3.3.35 Surface water on the fairways and roughs is collected by gullies located along the perimeter of the playable areas and runs into the main gravity drain pipes which discharge into the tanks and ponds. Green and tee areas, bunkers and the driving range outfield are drained by subsurface drainage. This consists of an array of perforated pipes (field drains) connected to a common main line which connects to the main gravity drain pipes. Footpaths are drained by filter drains or gullies. The rest of the application site is drained by channels and swales. An outlet pipe connecting the car park with the drainage network is also proposed.

3.3.36 The majority of the application site is in Flood Risk Zone 1. A small part (approximately 10 per cent) of the golf course is inside the floodplain of the River Pinn (Flood Risk Zones 2 and 3), so the flood risk is medium-high. The current and proposed land use is classified as "water-compatible" in the National Planning Policy Framework and is therefore appropriate. Surface water flooding is managed through the proposed drainage network described above, and is described in more detail in the Drainage Report and Flood Risk Assessment.

3.3.37 Flood risk is not increased elsewhere for all flood sources because:

- the floodplain of the River Pinn is not modified and an additional flood storage area is provided;
- the proposed development does not change the existing hydrological catchments. The application site will continue drain to the River Pinn as it does currently; and
- sustainable urban drainage system (SUDS) techniques are included in the proposed drainage network and current runoff rates are attenuated.

3.3.38 It is important to note that there will be additional drainage consents required in this area as a result of the HS2 works. These will include:

- HS2 Act, Schedule 33, Part 5 - Discharge licence of water from compound to River

Pinn.

- HS2 Act, Schedule 33, Part 5 - New drainage discharge points into River Pinn (from track drainage, from Gatemead and West Ruislip Retained Embankments, also from balancing pond on west side of Breakspear Road).
- HS2 Act, Schedule 33, Part 5 - Abstraction licence needed for dewatering of vent shaft for excavation works.

### *Sustainability*

3.3.39 In addition to the flood risk management interventions described previously, wherever feasible the design has incorporated measures to enhance the long-term sustainability of the proposed development.

3.3.40 The landscape maintenance requirements of a golf course generate substantive demand for water. The proposed development incorporates a water harvesting system, including three ponds and three tanks, and an irrigation system. These features will significantly reduce the course's reliance on groundwater and ensure that its water needs can be almost entirely met by water collected and stored on site. The system will have capacity for approximately 14,000m<sup>3</sup> of storage, sufficient to irrigate the golf course for 100 continuous days without precipitation.

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

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

3.3.43 The design will also involve the reuse of materials on site where possible, for example using felled trees to create log piles. Additionally, the improvement of PROWs across the site will encourage walking as a sustainable mode of transport.

## **3.4 Construction and Phasing**

3.4.1 The existing golf course closed in August 2019 following the commencement of the construction of HS2 to the south of the application site. This date was dictated by the HS2 construction programme.

3.4.2 Construction of the golf course would commence when material from the West Ruislip Portal becomes available in April 2021. This material would be stored on site and then used to re-profile the new course. The construction of the new golf course is expected to take 18 months and would include:

- site establishment and removal of vegetation/trees;
- demolition of the driving range;
- earthworks, hard landscaping and planting of new trees; and
- construction of irrigation and drainage systems.

3.4.3 Construction would be complete in 2023 when soft landscaping works would commence followed by a reestablishment period. The expectation is for the golf course to then reopen in 2024.

3.4.4 Construction work would be undertaken in accordance with the HS2 Phase One London-West Midlands Code of Construction Practice (HS2 CoCP) which outlines measures to reduce potential effects on the environment.

### **Maintenance prior to construction**

3.4.5 To support this application an Outline Management and Maintenance Plan has been submitted which provides information on maintenance approach and responsibilities after course closes prior to construction.

## **3.5 Operation**

3.5.1 Operation of the new golf course will be determined by Golf Hillingdon and is expected to be very similar to the existing facility. It would be available to members of the public on a 'pay and play' basis and to club members.

3.5.2 Opening hours would be similar to existing. The golf course and academy course would operate during daylight hours, and the driving range would be opening hours would be similar to the existing hours, as set out in Table 2.

Days	Opening/closing hours	Last balls
Monday to Thursday	09:00 – 21:00	20:30
Friday to Sunday	09:00 – 19:30	19:00

Table 2 Ruislip Golf Course Existing Opening Hours

3.5.3 The rifle range will continue to operate the same hours Monday to Friday 19:00 to 22:00 and Saturday 09:30 to 15:30.

## 4 Engagement

### 4.1 Public consultation

4.1.1 Two public consultation events were held to gather the public's views on the proposals. These events covered HS2's proposals in the Hillingdon area and in addition to the golf course included design information on the railway and associated works.

4.1.2 The first event was held on Tuesday 9 October 2018, 14:00 to 19:30 at the Barn Hotel, West End Road, Ruislip, HA4 6JB and was attended by 212 people. The second event was held at the club house, on Monday 29 October 2018, 14:00 to 19:30 and was attended by 321 people.

4.1.3 Leaflets were distributed to neighbouring properties, as illustrated in Figure 1, to publicise the events; a copy of the leaflet can be found in Appendix C. The events were also publicised on the HS2 Commonplace website.<sup>4</sup> The local Residents Associations, Rifle Club and Ruislip Golf Club Membership committee were notified of the events. Posters were also put up in the club house two weeks before the event held on 29 October; a copy of the poster can be found in Appendix C.



Figure 1 Distribution area for publicity flyer

4.1.4 A variety of views on the golf course proposal were expressed and these are summarised in Table 3, along with a response where applicable.

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

<sup>4</sup> <https://hs2inhillingdon.commonplace.is/schemes/proposals/upcoming-local-events/details>

Comment	Response
	Recent figures published by England Golf (available at: <a href="https://www.englandgolf.org/news.aspx?itemid=15096&amp;itemTitle=New-figures+show+a+rise+in+popularity+for+nine-hole+golf&amp;sitesectionid=38&amp;sitesectiontitle=News">https://www.englandgolf.org/news.aspx?itemid=15096&amp;itemTitle=New-figures+show+a+rise+in+popularity+for+nine-hole+golf&amp;sitesectionid=38&amp;sitesectiontitle=News</a> ) show a rise in popularity for nine hole golf which is a shorter game that people of all ages and abilities can play. England Golf has reported a 50% increase in nine hole competitive scores returned between 2014 and 2017.
Questioned why additional land to the west of the River Pinn couldn't be purchased to deliver an 18 hole replacement course.	The redeveloped golf course is provided within the ownership boundary of Ruislip Golf Course.
Suggestion to raise the Celandine Route to prevent flooding.	The Celandine Route is part of the functional flood plain, increasing its height would have implications for flooding elsewhere. The proposal includes a new footpath running between the Celandine Way and the Hillingdon Trail which will provide an alternative route between the south-west corner of the application site and Clacks Lane/the Hillingdon Trail to the north of the site.
Dog walkers and pedestrians not keeping to the footpaths currently cause problems for golfers.	Footpaths on site are currently difficult to navigate as there is not a clear footpath or signage. The proposed footpaths will be more legible to encourage users to keep on the paths. Signage will be provided in accordance with LB Hillingdon's Wayfinding Strategy.
General support for the realignment of the Ickenham Stream. One attendee queried where the water would come from since the stream is currently dry.	The Ickenham Stream will be part of the drainage system for the course, water will be collected on site and fed into the Ickenham Stream.
General support for the realignment of the Hillingdon Trail to make it safer.	NA
Queried whether the academy would be successful in attracting young and beginner golfers to take up the game.	The England Golf Strategic Plan 2017/21 identifies the need to grow the game of golf, and the importance of attracting children, women and beginners in particular. The provision of facilities such as the academy course will encourage this.
Concern regarding the duration of closure.	The construction of the golf course will take approximately 18 months, followed by an 18 month re-establishment period. This duration is typical of a golf course of this size. The overall duration of closure is dictated by the timing and speed of the construction of HS2 because the course will close when this is commenced, and remodelling of the course will commence when material from the Portal is available to be reused on site.
Queried how the long term	A Management and Maintenance Plan is submitted as part of this

Comment	Response
management and maintenance of the course will be managed to ensure it is high quality.	application. The long term management and maintenance of the course will be the responsibility of the operators, Golf Hillingdon.
Highlight the importance of protecting existing habitats on site.	Retaining the most valuable habitats on site has been a key principle informing the design. More information can be found in the Design and Access Statement and Ecological Assessment submitted with this application.
Agreement that the driving range is in need of replacement.	NA
Suggestion that Cotswold gravel is the most suitable material for the footpaths.	Self-binding gravel, or similar will be used on the new footpaths.
Request for an automatic ball counter to be included in the new driving range.	This is a matter for Golf Hillingdon to consider as the future operators of the course.
Request that Clacks Lane remains open during construction.	Clacks Lane will remain open during construction of the golf course. Minor works in relation to drainage are proposed across Clacks Lane and this may necessitate a short temporary closure of Clacks Lane while drainage pipes are laid.
Golf balls are currently sometimes hit into properties on the Greenway.	The new course arrangement and increased distance between the Greenway and the Driving Range will reduce the likelihood of balls being hit out of the site. The Driving Range will also include safety netting which is higher than the existing to meet modern standards.
Concern about the safety margin along Clacks Lane.	The new 1st hole is on the same alignment as the existing 17th hole and the new 9th hole is on the same alignment as the existing 14th hole. The safety margins have been determined by golf course architect following accepted standards.
Queried about what will happen to the memorial trees on the course.	There are three trees with memorials on the golf course. Two of these trees are located to the north of the course on trees which will be unaffected by the proposals. The third tree is located outside of the planning application boundary within the HS2 Act limits. HS2 has been made aware of the presence of this memorial.
Queried level of tree planting around the academy course.	As illustrated in the Indicative Tree Removal Plan (IM04-SCJ-EV-DPL-SS05-SL07-241200) no tree felling is proposed on land to the east of Clacks Lane where the proposed academy course is located.
Query around which footpaths will be accessible during construction.	Footpath U81 (known as the Hillingdon Trail) will be temporarily diverted via The Greenway, High Road, Ickenham Road and Clacks Lane during construction of the HS2 development. Footpaths R145, and U44 / R147 (known as the Celandine Route), will remain accessible throughout construction.

Comment	Response
Agreement that proposed course will be sufficiently challenging.	NA
Enthusiasm that academy course will promote health benefits amongst local population.	NA
Request for programme of tuition / tournaments for local schoolchildren to accompany academy course.	This is a matter for Golf Hillingdon to consider as the future operators of the course.
Need to improve course drainage	A new drainage design is proposed which will address the drainage issues currently faced.
Highlight drainage issues associated with golf course runoff to rear of properties on Hill Rise.	The drainage network associated with the proposed development will alleviate surface water flooding risks to neighbouring properties. With regard to properties on Hill Rise, surface water from proposed academy holes #2 and #3 immediately adjacent will be drained to the south/south-west by culverts and, on the tees, holes and bunkers, by a network of perforated pipes, thus alleviating pressure on the existing channel to the south of these properties.
Query as to where existing golfers/golf club members be accommodated during the development.	Golf Hillingdon operates three additional public golf courses at Northwood (Haste Hill), Stockley Park and Uxbridge, which together will cater for existing golfers during construction.
Queried whether the club house and Fairway pub will remain operational while the golf course is closed.	No alterations are proposed to the club house, including the Fairway pub, as part of this application. The ongoing opening of the pub is therefore a matter for Greene King as operators of the pub.
Concern around additional construction-related traffic on main roads through Ickenham and Ruislip.	50,000m <sup>3</sup> of excavated material from construction of the West Ruislip Portal, part of the HS2 development, will be used on the golf course to achieve its design ambition. This will limit the requirement for additional vehicle movements during construction of the golf course and furthermore significantly reduce vehicle trips required to remove material from the HS2 site. Taking this into consideration, the Transport Statement found that the proposed development will generate approximately 32 vehicles movements per month, which is just over one per day on average. Construction management and logistics measures will be implemented to ensure compliance with planned routing, delivery, access and safety standards.
Concern at loss of trees/shrubs and wildlife habitat on golf course and queried replacement species.	The retention of the most valuable trees has been a key design principle from the outset. The design has sought to minimise the felling of trees/shrubs wherever feasible, and in particular has incorporated the findings of relevant technical assessments including the Ecology Assessment and the Arboricultural Survey. The topographical design of the golf course was developed to ensure the

Comment	Response
	most valuable trees are retained on site. The net number of trees on the application site will be higher following implementation of the proposed development and native species will be used throughout.
Concern at construction-related noise for the allotments and residential properties to the north of the application site.	The HS2 CoCP, which will be adopted for the proposed development, sets out measures for the mitigation and management of noise during construction.
The back of the golf course onto Breakspear Road South should have a footpath to Copthall Road West/Breakspear Road South	Such a connection would fall outside the extent of this application.
Consultees liked the following aspects of the existing course: the open space, it being a friendly course, affordability, nice walking routes, the semi-rural setting.	NA

Table 3 Summary of Comments and Responses from Public Consultation Events

4.1.5 In addition, emerging proposals were presented to the Chairs of the Ruislip, Ickenham and Harefield Residents Associations on 7 August 2018. The emerging proposals were generally well received at this meeting.

## 4.2 Engagement with Golf Hillingdon

4.2.1 The golf course is owned and operated by LB Hillingdon; in this application the team within the council responsible for operating the course is referred to as Golf Hillingdon.

4.2.2 Golf Hillingdon provided a specification checklist which set out their requirements and expectations for the redevelopment of the course, a copy can be found in the appendices of the Design and Access Statement. This stated: "The design concept for the Golf Course should be driven by a public access, open to all golf and leisure provision. The facilities should be designed and constructed so as to provide 365 days year-round golf. The three golf-based sports provisions should be; a high quality nine hole golf course with multiple Teeing areas, an Academy course aimed at golfing beginners and developers and a 20 bay floodlight Driving Range."

4.2.3 The specification checklist also provided more detailed requirements for the nine hole course, driving range, practice putting green, bunkers, six hole academy course, footpath and irrigation system. The specification also stated that the facilities "should have the best possible infrastructure for access, drainage and irrigation. The Golf courses and Range outfield should be constructed to a high standard of soil engineering, agronomy and

landscaping. The completed facilities should also enhance and improve the local environment and ecology."

4.2.4 The design specification has informed the design and the majority of Golf Hillingdon's requirements have been incorporated. The main exception is that this application does not propose a new pro shop building because the existing facility is unaffected by the HS2 development and is therefore located outside the red line boundary of this application.

4.2.5 A design workshop was held with representatives from Golf Hillingdon on 16 July 2018. Discussion covered the existing operation of the course, the emerging design and the design specification. Golf Hillingdon confirmed they were generally happy with the design as it was evolving with the exception of the omission of a new pro shop from the proposals. Golf Hillingdon made some detailed comments which were subsequently considered by the design team.

4.2.6 A subsequent design workshop was held on 24 October 2018 which provided Golf Hillingdon representatives an update on key developments since the previous meeting, as well as feedback on how previous comments had been taken into consideration in the further development of the design. A flythrough video utilising the 3D model of the course was shown. Discussion predominantly focused on the design of the driving range, rifle range, and drainage and irrigation network. Feedback on the emerging design was generally positive, with the exception of the omission of a new pro shop and the lack of secure storage for golf buggies. Secure buggy storage has subsequently been incorporated into the proposed driving range design. Further comments were received and, again, considered by the design team.

4.2.7 Meetings were also held with Golf Hillingdon on specific topics, including drainage, the driving range and general operation of the current facility.

### 4.3 Pre-Application engagement with LB Hillingdon

4.3.1 A pre-application meeting was held with LB Hillingdon (as the Local Planning Authority) and Golf Hillingdon on 24 May 2018; the principle of the development, scope of the application and approach to Environmental Impact Assessment (EIA) screening were discussed.

4.3.2 Following a formal request to LB Hillingdon for pre-application advice, a subsequent meeting was held on 30 November 2018. The meeting included discussion across a range of topics, including course design principles, drainage design, scope of the planning application and programme.

4.3.3 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) contains a schedule of types of project that may require an Environmental Impact Assessment (EIA) to be undertaken. Projects falling under Schedule 1 require EIA to be undertaken in all cases. The Proposed Scheme was not of a type falling under Schedule 1 and therefore did not require a mandatory EIA.

4.3.4 Schedule 2 of the EIA regulations requires an EIA for developments that exceed certain defined thresholds; and where it can be demonstrated that there will be potential significant effects. The Proposed Scheme is, as defined by Schedule 2, considered to be a "tourism and leisure," "golf course" development with an area which "exceeds 1 hectare." As the development exceeds this threshold, it was considered prudent to consider the potential for the development to "have significant adverse effects on the environment" and thusly if it was the opinion of LB Hillingdon that a supporting EIA would be required.

4.3.5 Accordingly, on 12<sup>th</sup> October 2018 an EIA Screening Request was submitted to LB Hillingdon for their consideration, with the Council issuing their Screening Opinion on 16<sup>th</sup> November 2018, where they acknowledged the scheme "will not give rise to likely significant effects."

4.3.6 For robustness, the Council requested a Screening Direction from the Secretary of State (SoS) on 25<sup>th</sup> January 2019. In response, on 14<sup>th</sup> February the SoS confirmed that they did not consider there to be a need for them to exercise their powers under Regulation 5(6) and thusly did not issue a Screening Direction. This process robustly demonstrated that this application does not require an EIA.

## 4.4 Other Pre-application Engagement

### *Environment Agency*

4.4.1 A meeting was held with the EA's waste team on 30 August 2018. The approach to the import of material to the application site was discussed and it was agreed that subject to materials being dealt with in accordance with the CL:AIRE Definition of Waste: Development Industry Code of Practice, in accordance with HS2's Material Management Plan Framework, the EA do not consider the import of material to be a waste activity.

4.4.2 A meeting was held with the EA on 16 August 2018 to discuss the proposed drainage design and flood risk assessment. The EA agreed with the proposed drainage strategy and approach to managing flood risk.

### *Natural England*

4.4.3 Natural England officers were consulted via email. They confirmed that they do not need to be directly involved in the golf course planning application because the contractor delivering the new golf course would comply with HS2's technical standards and ways of working so they do not expect any issues on site as a result of the proposed works.

4.4.4 Natural England noted that areas of habitat creation along the newly diverted Ickenham Stream should be appropriate for the area they are passing through and as much as possible of the arising from West Ruislip Portal should be used on site to reduce the need to remove material by lorry. These suggestions are both incorporated into the design.

### *Greater London Archaeological Advisory Service*

4.4.5 A meeting was held with the Greater London Archaeological Advisory Service on 17 October 2018 and a subsequent site visit took place on 31 October 2018. The Ridge and Furrow landscape on site was observed. It was subsequently agreed that the most appropriate way to manage the archaeological and heritage features on the course was for an Archaeological Desk Based Assessment to be submitted with the application and for an Archaeological Watching Brief to be prepared and implemented prior to construction.

### *England Golf*

4.4.6 England Golf has been consulted on the scheme via email. England Golf shared high level design guidance setting out the principles of good design for golf courses which have been considered in the design.

### *Network Rail*

4.4.7 Network Rail were informed of the proposals as part of their on-going engagement on the HS2 development. Network Rail confirmed they have no reservations with the proposed development.

### *Greater London Authority, Ramblers Association and Ministry of Defence*

4.4.8 Letters were sent to the Greater London Authority, Ramblers Association and Ministry of Defence (in respect of RAF Northolt) on 16 October 2018 explaining the proposal and explaining that the applicant would be happy to meet to discuss the application. No responses were received.

## **5 Socio-economic Impact**

### **5.1 Introduction**

5.1.1 The EIA Screening Request, submitted to LB Hillingdon on 12 October 2018, concludes that (in EIA terms) there will be no likely 'significant effects' arising in relation to socio-economics. Nevertheless, it is important to summarise the changes that will be brought about by the proposed development.

### **5.2 Baseline**

5.2.1 Demographic data illustrates that the local population is broadly representative of the average for London, particularly in relation to employment, economic activity and affluence. 65 per cent of the population of Hillingdon are of working age 16-64, slightly lower than the London average of 68 per cent.<sup>5</sup> A higher proportion, 78 per cent, are economically active, which is in line with the London average.<sup>6</sup> Only 1.4 per cent of Hillingdon residents claim out

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<sup>5</sup> ONS Population Estimates – local authority based by five year age band (2016)

<sup>6</sup> Employment and Unemployment (Jan 2017-Dec 2017), ONS Annual Population Survey

of work benefits, compared to 2.2 per cent in across London.<sup>7</sup> Furthermore, Hillingdon is ranked number 23 (least deprived) out of the 32 London Boroughs.<sup>8</sup>

5.2.2 Data provided by Golf Hillingdon confirms that Ruislip Golf Course, together with other Golf Hillingdon sites at Haste Hill and Uxbridge, currently support approximately 21 employees (estimated to be equivalent to 15.5 Full Time Employees (FTEs))<sup>9</sup>, as well as additional employees on a seasonal basis. Employees work flexibly across the three sites. This gross direct employment is summarised in Table 4.

Job Role	No. Employees	Estimated No. FTEs
Business and Team Manager	1	1
Commercial Manager	1	1
Assistant Commercial Manager	1	1
Head Greenkeeper	2	2
Assistant Greenkeepers	6	6
Customer Service Assistant (Full Time)	3	3
Customer Service Assistant (Part Time / Casual)	5	1
Ball Collector	2	0.5
<b>Estimated Total FTEs</b>		<b>15.5</b>

Table 4 No. employees and FTE equivalents employed by Golf Hillingdon

5.2.3 In addition, the restaurant/public house use within the existing club house supports a modest number of additional employment opportunities (not reflected within this data), and the golf course will also support additional 'indirect' employment opportunities through supply chains (not likely to be substantial in the local context).

5.2.4 In the 2017/18 financial year, a total of 18,368 rounds of golf were played at the course, an average of 50 /day. Of these, 43 per cent were played by season ticket holders, with the remaining 57 per cent consisting of 'pay and play' rounds. In addition, over 2m balls were used on the driving range.

5.2.5 While approximately two thirds of season ticket holders reside in the HA (Harrow) postcode area, in close proximity to the golf course, a sizeable proportion travel from further afield. Golf course users are therefore likely to make a modest additional contribution to the local economy. This may have a positive 'catalytic' effect on other local businesses in the vicinity of the Golf Course. For instance, once golfers are in the area they are more likely to use other services, for example spend in local cafes and shops.

<sup>7</sup> Claimant count by sex – not seasonally adjusted (April 2018), ONS Claimant count by sex and age

<sup>8</sup> Indices of Deprivation (2015)

<sup>9</sup> Based on an assumption that 5 part time / casual jobs are equivalent to 1 FTE, rounded to the nearest 0.5 FTE.

5.2.6 In addition to Ruislip, the Borough contains three additional public golf courses at Northwood (Haste Hill), Stockley Park and Uxbridge.

## 5.3 Impacts

### Construction

5.3.1 During construction, based on the estimated capital costs (CAPEX), the proposed development is likely to support a small number of additional FTE jobs relative to the overall size of the construction sector and the local and regional economies, generating net additional Gross Value Added (GVA) of approximately £450,000.

5.3.2 HS2 Ltd. requires all contractors to employ apprentices and help local, disadvantaged and under-represented groups in the delivery of works.<sup>10</sup> This increases the likelihood that people from the local area will be employed during the construction of the proposed development. Nonetheless, taking into consideration the uniquely flexible nature of the construction sector which operates at a 'pan-regional' scale across London, the East of England and the South East, it is likely that there will be a sizeable rate of leakage from the local area.

5.3.3 The existing golf course will not be able to operate during construction of the proposed development. Golf Hillingdon have confirmed that all FTEs based across the Ruislip, Haste Hill and Uxbridge site will be retained and redeployed to ensure retention of skills. Thus, there will be no direct loss of employment as a result of the proposed development.

5.3.4 The temporary closure of the golf course will likely reduce the customer base ('footfall') and desirability ('pull') of the existing restaurant / pub due to proximity to construction. In-combination effects such as noise, air quality issues, visual effects and HGV movements are likely to affect the customers of the pub / restaurant, and there may be a resultant effect upon level of business received. This may contribute, indirectly, to some loss of employment. However, the proposed development does not propose any specific works in relation to the club house, and furthermore net additional effects are considered insignificant relative to the likely effects arising from the HS2 development.

5.3.5 The development site could be visually intrusive throughout the construction period. However, the visual effects will be minimised through mitigation measures during the construction process, as set out in the HS2 CoCP.

5.3.6 Overall, the proposed development is likely to have a neutral net economic effect during construction. In relation to the effect on the local community, these are expected to be adverse and temporary, but not significant.

### Operation

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<sup>10</sup> HS2 Ltd, 2017. *High Speed Two Phase 2a Information Paper*.

5.3.7 It is assumed that the golf course, public house/restaurant and rifle range would operate in a broadly similar way to the existing uses during operation.

5.3.8 The provision of planting and landscaping which requires minimal maintenance, in line with Golf Hillingdon resource availability, is a guiding principle which has informed the design as set out in the Design and Access Statement.

5.3.9 The new design is intended to create a more challenging and interesting course which, while potentially disadvantaging some of the existing membership, may also attract new players. There would be a loss of 20 driving range bays, which may affect the ability to train a new cohort of golfers. However, contrasting this, the academy course is likely to appeal to newer players. The new drainage design also means that fewer days play will be lost due to flooding of the course. It is therefore anticipated that the proposed development would have minimal effects upon overall usage of the golf course.

5.3.10 Overall therefore, the proposed development is likely to have a neutral net economic effect during operation.

5.3.11 The proposed development will improve the overall setting of the course, and result in habitat creation, including new woodland areas with scrub and grassland understorey. New and improved PRoWs would also be provided through the site, improving accessibility and providing enhanced access to open space. Assuming that there will be minimal effect upon overall usage of the golf course, there are not expected to be any disruptive effects to local residents as a result of the proposed development.

5.3.12 Overall, it is considered that the proposed development will result in permanent, beneficial effects upon neighbourhood quality and accessibility.

## 6 Planning Policy Framework

### 6.1 Planning Framework

6.1.1 Table 5 provides a summary of the policy documents which make up the adopted development plan for the site. Where applicable, this also identifies pre-adoption development plan documents that will be a material consideration in determining a planning application for the site.

Policy Level	Status	Policy Document
National	Adopted	National Planning Policy Framework (February 2019)
Regional (London)	Adopted	London Plan (March 2016)
		Sustainable Design and Construction SPG (2014)
	Awaiting Inspector's Report	All London Green Grid SPG (2012)
		Draft New London Plan (with Consolidated Suggested Changes) (July 2019)
Local	Adopted	Hillingdon's Local Plan: Part 1 – Strategic Policies (2012)
		Saved Unitary Development Plan Policies (2007)
	Submitted for Examination	Hillingdon's Local Plan: Part 2 – Development Management Policies – Revised Proposed Submission Version (October 2015)
		Hillingdon's Local Plan: Part 2 - Site Allocations and Designations – Revised Proposed Submission Version (October 2015)
		Hillingdon's Local Plan: Part 2 - Policies Map – Revised Proposed Submission Version (October 2015)

Table 5 Summary of national, regional, sub-regional and local planning documents relevant to the proposed development

### 6.2 National Level Policy

#### *National Planning Policy Framework (February 2019)*

6.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies. The main focus of the NPPF is on a "presumption in favour of sustainable development" (paragraph 11).

6.2.2 The NPPF also sets out a number of core planning policies, several of which are of particular relevance to the proposed development:

- Section 2 - Achieving sustainable development: emphasises the role of planning in ensuring sustainability in development. There is a focus on gaining the correct balance between the three dimensions of sustainable development – economic, social

and environmental.

- Section 8 - Promoting healthy and safe communities: focuses on creating safe and accessible environments, and promotes the provision of social and recreational facilities, and open space.
- Section 9 - Promoting sustainable transport: emphasises that transport issues should be taken into consideration at the earliest stages in a development proposal.
- Section 12 – Achieving well-designed places: emphasises the importance of design to place making and improving the built environment, whilst ensuring that development is sustainable. Applications which can demonstrate early, proactive and effective engagement with the local community should be considered more favourably.
- Section 13 – Protecting Green Belt land: sets out the fundamental aim of Green Belt policy, “to prevent urban sprawl by keeping land permanently open” and directs local authorities to refuse applications for inappropriate development except in very special circumstances. The construction of new buildings is defined as inappropriate development subject to a number of exceptions, including provision of outdoor sport and outdoor recreation facilities.<sup>11</sup> The whole application site is designated as Green Belt.
- Section 14 - Meeting the challenge of climate change, flooding and coastal change: encourages new development that both reduces greenhouse gas emissions and actively supports energy efficiency. It also emphasises that inappropriate development in areas at risk of flooding should be avoided, but where necessary this should be made without increasing flood risk elsewhere. SUDS should be incorporated into all developments in areas at risk of flooding (unless there is clear evidence that this would be inappropriate).
- Section 15 - Conserving and enhancing the natural environment: promotes the conservation and enhancement of the natural environment in relation to biodiversity, contamination, land use, noise, air quality and light pollution. Developments that secure measurable net gains for the environment should be supported.
- Section 16 - Conserving and enhancing the historic environment: focuses on the need to preserve and protect irreplaceable heritage assets, including sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites.

## 6.3 Regional Level Policy

*London Plan (March 2016)*

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<sup>11</sup> As long as such development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

6.3.1 The London Plan is the overall spatial development strategy for Greater London, articulating the Greater London Authority's strategic spatial policies across a broad range of themes. The currently adopted London Plan was first published in July 2011 and was subsequently subject to alterations. The current version, published in March 2016, consolidates all alterations made to the Plan since 2011.

6.3.2 The London Plan contains several policies of particular relevance to the proposed development. The application site links the outer edge of London's built-up area to the Colne Valley Regional Park, which lies to the west. Policy 2.18 encourages the incorporation of appropriate elements of green infrastructure that are integrated into London's wider network green infrastructure network, as well as linkages into the wider public realm.

6.3.3 The proposed development is in line with Policy 3.19, which supports the enhancement of sports and recreation facilities. It also supports the provision of sports lighting in areas where there is an identified need for sports facilities to increase sports participation opportunities, unless it gives rise to demonstrable harm to local community or biodiversity. Policy 4.6 requires that cultural and professional sporting facilities:

- *...be located on sites where there is good existing or planned access by public transport*
- *be accessible to all sections of the community, including disabled and older people*
- *address deficiencies in facilities and provide a cultural focus to foster more sustainable local communities.*

6.3.4 Policy 7.16 reiterates national policy on Green Belt, stating that inappropriate development should be refused and offering support to appropriate development that "helps secure the objectives of improving the Green Belt as set out in national guidance".

6.3.5 The application site incorporates a site of borough and local importance for nature conservation, which should be given the level of protection "commensurate with [its] importance" (Policy 7.19). The policy goes on to state that development proposals should contribute positively to the protection, enhancement, creation and management of biodiversity and, where possible, avoid adverse impacts to biodiversity before considering minimisation of impacts or mitigation. Policy 7.21 states that trees of value should be retained, with any loss replaced following the "right tree, right place" principle, and additional tree planting is encouraged.

6.3.6 A number of other policies are particularly relevant to the proposed development. These are summarised in Table 6.

Reference	Summary of Policy
Policy 3.2: Improving health and addressing health inequalities	Requires new development to be designed, constructed and managed in ways that improve health and promote healthy lifestyles.

Reference	Summary of Policy
Policy 4.1: Developing London's economy	Promotes development of strong, sustainable and diverse economy across London. Support for outer London as attractive location for businesses.
Policy 5.12: Flood risk management	Requires development to comply with national and pan-regional flood risk assessment and management requirements, and sets out requirements to ensure that developments consider flood resilient design and emergency planning. The northern part of the application site is in Flood Zones 3a, 3b and 2.
Policy 5.13: Sustainable Drainage	Requires that development utilises SUDS and that drainage assists in delivering other policy objectives around water efficiency and quality, biodiversity, and amenity and recreation.
Policy 5.15: Water use and supplies	Requires development to minimise use of mains water by incorporating water saving measures and equipment.
Policy 5.18: Construction, excavation and demolition waste	Encourages the removal of construction waste, and transport of materials to sites, by water or rail transport wherever practicable.
Policy 6.13: Assessing effects on development on transport capacity	Requires developments to assess transport capacity/network, both at corridor and local levels, and not result in adverse effects on the safety of the transport network.
Policy 6.10: Walking	Requires development proposals to ensure high quality pedestrian environments. Several footpaths/Public Rights of Way cross or run alongside the application site.
Policy 7.2 An inclusive environment	Requires new development to achieve the highest standards of accessible and inclusive design.
Policy 7.8: Heritage assets and archaeology	Necessitates development affecting heritage assets and their settings to conserve their significance. There are three Grade II listed buildings approximately 150m to the north of the application site and three Locally Listed Buildings immediately adjacent to the site. Ruislip Village Conservation Area abuts the application site to the east.
Policy 7.28: Restoration of the Blue Ribbon Network	Encourages the restoration and enhancement of the Blue Ribbon Network, including the River Pinn, and sets out a number of means by how this could be achieved.

Table 6 Summary of additional London Plan policies relevant to the proposed development

### *Sustainable Design and Construction SPG (2014)*

6.3.7 The Sustainable Design and Construction SPG supplements the London Plan, providing further detail on how sustainable design and construction and wider environmental sustainability policies should be implemented. It also provides examples of how to implement sustainability measures within developments.

### *All London Green Grid SPG (2012)*

6.3.8 The All London Green Grid SPG promotes consideration of London's network of parks, green spaces and countryside as a functional network and a critical part of the city's infrastructure. The SPG provides guidance on how London Plan policy should be implemented in order to secure a network of high quality, well designed and multifunctional green and open spaces across London, securing an additional component of urban infrastructure.

### *Draft New London Plan (with Consolidated Suggested Changes) (July 2019)*

6.3.9 The draft New London Plan with Consolidated Suggested Changes was published in July 2019 following the Examination in Public which took place in early 2019. This followed a public consultation on an earlier draft of the Plan, which ended on 2 March 2018. The provisional timetable anticipates that the Plan will be published in late 2019 / early 2020.

6.3.10 Although the draft New London Plan contains a number of new or amended policies, in practice there are few changes which are likely to alter the overall policy framework against which the proposed development is assessed.

6.3.11 Policy G6 strengthens the GLA's position on biodiversity, stating that biodiversity enhancement should be considered from the start of the development process. Policy G7 states that development proposals should ensure that, "wherever possible, existing trees of quality are retained". It goes on to confirm that, where tree removal is imperative, replacements should be adequate based on the value of existing trees<sup>12</sup>.

6.3.12 Policy SI7 introduces a new requirement for referable applications to promote circular economy outcomes and include a Circular Economy Statement. This should set out, for example, "*how all materials arising from demolition and remediation works will be re-used and/or recycled*". In accordance with the Town and Country Planning (Mayor of London) Order 2008, the proposed development does not meet the development quantum thresholds to qualify for mayoral referral. However, in line with good practise this policy will still be a consideration as part of this application submission.

## **6.4 Local Level Policy**

### *Hillingdon's Local Plan: Part 1 – Strategic Policies (2012)*

6.4.1 The Hillingdon Local Plan: Part 1- Strategic Policies (adopted November 2012) forms part of the adopted local development plan for the proposed development site. It is the strategic planning document for Hillingdon and includes broad policies for steering and shaping development.

6.4.2 Several policies are of particular relevance to the proposed development. Part of the West Ruislip Golf Course and Old Priory Meadows Nature Conservation Site of Borough Grade II Importance is located within the application site. Policy EM7 sets out an overarching aim to

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<sup>12</sup> "...determined by, for example, i-tree or CAVAT."

preserve and enhance Hillingdon's biodiversity and geological features and highlights some specific considerations including:

- The protection and enhancement of all Sites of Importance for Nature Conservation (SINC);
- The protection and enhancement of protected/priority species/habitats;
- Requirement for developer contributions or delivery/assistance in delivering enhancements to nearby SINC;
- The use of sustainable drainage systems.

6.4.3 Part of the application site is in a Source Protection Zone (SPZ) 1 area. Policy EM8 aims to safeguard and improve all ground and surface water quality, prioritising SPZs and key watercourses, including the River Pinn which lies along the site boundary. It also establishes a requirement for new development to demonstrate the incorporation of water efficiency measures, including water recycling and collection facilities (unless demonstrably inappropriate).

6.4.4 Policy CI2 establishes an overarching goal to secure good quality, well maintained leisure and recreation facilities to address identified deficiencies and meet local needs, particularly in relation to deprived groups, and sets out how this will be achieved. This includes supporting proposals for new and improved facilities, and promotion of inclusive and accessible design, climate change mitigation, and sustainable transport within new and existing developments.

6.4.5 Policy EM5 commits the Council to a series of actions around sport and leisure facilities, including safeguarding, enhancing, extending and promoting the existing network of sport and leisure spaces that meet community needs. It goes on to state that features that promote more active lifestyles should be designed into future developments, including opportunities for informal activity and recreation. Furthermore, a presumption against any net loss of active sport and leisure facilities is established.

6.4.6 Table 7 summarises other policies of relevance to the proposed development.

Reference	Summary of Policy
HE1: Heritage	Requires the Council to conserve and enhance Hillingdon's historic environment, its settings and the wider historic landscape, including designated heritage assets (including Conservation Areas and Listed Buildings) and locally recognised historic features.
EM1: Climate Change Adaptation and Mitigation	Requires that the Council ensure climate change mitigation is addressed at every stage of the development process and sets out how this will be achieved (for example, in relation to transporting waste and consideration of water cycle impacts).

Reference	Summary of Policy
EM2: Green Belt, Metropolitan Open Land and Green Chains	States that the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains will be maintained. Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.
EM3: Blue Ribbon Network	Requires that the Council promote and contribute to the positive enhancement of strategic river and canal corridors and associated wildlife and habitats.
EM4: Open Space and Informal Recreation	Ensures the Council safeguards, enhances and extends the network of open spaces, informal recreational and environmental opportunities in order to meet local needs, including seeking protection for existing tree and landscape features.
EM6: Flood Risk Management	Requires new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the NPPF.

Table 7 Summary of additional Hillingdon Local Plan: Part 1 policies relevant to the proposed development

### *Hillingdon Unitary Development Plan (UDP) – Saved Policies (2007)*

6.4.7 The Hillingdon UDP was Hillingdon's long term development plan. While its strategic policies have been superseded by the Local Plan: Part 1, the remaining policies have been 'saved' and remain part of the adopted development plan. The UDP will be replaced by Hillingdon's Local Plan: Part 2 once adopted.

6.4.8 The UDP Saved Policies around biodiversity and the natural environment are particularly relevant to the proposed development site. Policy EC2 states that the local planning authority (LPA) will "take nature conservation interests into account in considering proposals for development of land especially within sites of Borough (Grade II) and Local Importance", of which 'Clacks Lane and Pinn near West Ruislip' is identified as a relevant site in the supporting text at Table 4.2. The policy goes on to confirm that the protection of species under the Wildlife and Countryside Act 1981 (Amended 1985) will be a material consideration, and that the Council may require submission of an ecological assessment prior to determination of an application.

6.4.9 Policy EC3 requires that proposals in the vicinity of Sites of Nature Conservation Importance have regard to the potential effects of "changes in the water table and or air, water, soil and other effects" arising, and Policy EC5 empowers the Council to require retention of certain on-site ecological features as well enhancement of the nature conservation and ecological interests of sites or creation of new habitats.

6.4.10 In relation to trees, Policy OL26 states that the Council will protect trees and woodlands, and that proposals in the more rural areas of the Borough should be "accompanied by proposals for landscaping and tree planting wherever practicable, and the retention of existing landscape features where appropriate".

6.4.11 Policy OL1 reiterates national policy on Green Belt, confirming that open air recreational facilities will be acceptable. In relation to such developments, Policy OL2 empowers the Council, where appropriate, to seek “appropriate landscaping improvements to achieve enhanced visual amenity and other open land objectives”.

6.4.12 Table 8 summarises other policies of relevance to the proposed development.

Reference	Summary of Policy
BE4	Requires that new development on the fringes of Conservation Areas preserve or enhance features contributing to their special architectural and visual qualities.
BE10	Development proposals should not be detrimental to the setting of (a) listed building(s).
BE34	Sets out various requirements for proposals for development adjacent to rivers, including regarding enhancing functionality as wildlife corridors, views and vistas, and public access.
BE38	Requires development proposals to retain and utilise topographical and landscape features of merit.
OE7	New / intensified development in areas liable to flooding will not be granted unless flood protection measures can be provided through the development.
AM7	Establishes the criteria against which development proposals will be assessed in relation to traffic generation.

Table 8 Summary of additional Hillingdon UDP saved policies relevant to the proposed development

*Hillingdon's Local Plan: Part 2 – Development Management Policies  
(Revised Proposed Submission Version) (October 2015)*

6.4.13 The Hillingdon Local Plan: Part 2 - Strategic Policies (Revised Proposed Submission Version) was submitted to the Secretary of State for independent Examination in Public (EiP) in May 2018 and the Examination hearings were held during August 2018. Although this Local Plan document has not yet been adopted as part of the statutory development plan, it will be a material consideration in determining the application for the proposed development.

6.4.14 Policy DME 4 supports, in principle, proposals that will enhance the Borough's visitor offer, subject to several requirements around, for example, impacts on neighbouring uses, suitable transport provision, and improvements and enhancements to the site's environmental attributes.

6.4.15 In relation to trees and landscaping, DMHB 14 establishes an expectation that developments will “retain or enhance existing landscaping, trees, biodiversity or other natural features of merit”, and sets out specific requirements around landscaping schemes for new developments, tree surveys where proposals would affect existing trees, and the provision of tree root protection areas and an arboricultural method statement to ensure trees are

protected. Where tree felling is proposed, proposals for replanting must be provided, or contributions for offsite provision made in lieu.

6.4.16 Policy DMEI 7 states that developments should "retain and enhance any existing features of biodiversity value within the site" and provide features of equivalent biodiversity value where loss is unavoidable. Appropriate surveys and assessments must be submitted where development is proposed near to features of ecological value.

6.4.17 Policy DMEI 11 requires proposals within a SPZ to assess risks to groundwater resources and demonstrate that these would be protected throughout construction and operation.

6.4.18 Table 9 summarises other policies of relevance to the proposed development:

Reference	Summary of Policy
DMHB 4 Conservation Areas	Establishes an expectation that development on the fringes of a Conservation Area will preserve or enhance the character or appearance of the area, sustaining and enhancing its significance, and sets out further requirements for development proposals in these locations.
DMHB 15 Planning for Safer Places	Requires all new development to ensure safe and attractive public and private spaces, referring to the Council's guidance on 'Secured by Design' principles.
DMEI 4 Development in the Green Belt or on Metropolitan Open Land	Reiterates NPPF and London Plan policy on appropriate development in Green Belt, additional requiring that development defined as 'appropriate' should preserve the openness of the Green Belt and not conflict with its purposes.
DMEI 9 Management of Flood Risk	Requires submission of an appropriate Flood Risk Assessment (FRA) for all development proposals in Flood Risk Zones 2 and 3a. Development in Flood Zone 3b will be refused unless identified as appropriate in Flood Risk Planning Policy Guidance.
DMEI 13 Importation of Material	Requires submission of a monitoring plan for all development proposals that include importation of material, as well as a written report on commencement of the disposal operation.
DMEI 10 Water Management, Efficiency, and Quality	Requires applications for new build development to include a drainage assessment demonstrating that SUDS have been incorporated, and states that major new build (and minor developments in Critical Drainage Areas or an area identified at risk from surface water flooding) must reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus 30% allowance for climate change.
DMT 1 Managing Transport Impacts	Requires development proposals to meet transport needs and address impacts sustainably and sets out requirements to ensure developments are acceptable in transport terms.
DMT 2 Highways Impacts	Sets out detailed requirements around the potential highway impacts of proposed developments.
DMT 7 Freight	Requires development proposals that generate a high number and/or intensity of transport and movements relating to logistics to demonstrate that they are conveniently located and have no deleterious impact on residential areas, local air quality levels, local amenity or the highway network.

Reference	Summary of Policy
DMT 5 Pedestrians and Cyclists	Requires development proposals to ensure safe, direct and inclusive access for pedestrians and cyclists, connecting development to the wider network.

Table 9 - Summary of additional Hillingdon Local Plan: Part 2 policies relevant to the proposed development

### *Hillingdon's Local Plan: Part 2 - Site Allocations and Designations (Revised Proposed Submission Version) (October 2015)*

6.4.19 The Hillingdon Local Plan: Part 2 - Site Allocations and Designations (Revised Proposed Submission Version) was submitted to the Secretary of State for independent Examination in Public (EiP) in May 2018 and the hearings were subsequently held during August 2018. The document proposes the extension of the West Ruislip Golf Course and Old Priory Meadows Nature Conservation Site of Borough Grade II Importance to include an additional triangular piece of land in the centre of the application site.

## 6.5 Planning Policy Interpretation for the Proposed Development

6.5.1 This section presents a topic-by-topic discussion of the proposed development in order to demonstrate conformity with national, regional and local planning policies.

6.5.2 Some of the topics covered in this section are subject to their own detailed assessments, as presented in other documents submitted as a part of the Application. The purpose of this section therefore, is to draw from those assessments and to consider their conclusions in the context of planning policy.

### Principle of Development

6.5.3 The overarching principle for the proposed development is supported by policy.

6.5.4 Section 8 of the NPPF (Promoting healthy and safe communities) encourages the provision of social and recreational facilities and open space. This principle is also supported by London Plan Policy 3.19, which supports the enhancement of sports and recreation facilities, and in policies set out in the adopted and emerging parts of the Hillingdon Local Plan (Parts 1 and 2 respectively). Policy Cl2 in the adopted Part 1 supports proposals for new and improved leisure and recreation facilities, and Policy DME 4 in Part 2 (Revised Proposed Submission Version) supports proposals that will enhance the Borough's visitor offer.

### Green Belt

6.5.5 The application site is designated Green Belt land. Paragraphs 143 and 144 of the NPPF are therefore relevant which state respectively:

*"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. "*

*"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 resulting from the proposal, is clearly outweighed by other considerations."*

## Appropriateness of Development Consideration

6.5.6 In considering the acceptability of the proposal on Green Belt land, it is first important to consider if, in accordance with the definitions given in the NPFF, any element of it represents genuine "inappropriate development".

6.5.7 The proposal comprises the following components for assessment:

- Re-profiling of existing golf course;
- Replacement of driving range;
- Retention of existing car park;
- Replacement of rifle range.

6.5.8 Paragraphs 145 and 146 sets out a list of exceptions whereby new buildings and development in Green Belt would not be inappropriate subject to preserving the existing levels of openness. The exceptions of relevance in this instant are:

*145 (b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*

*145 (d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*

*145(g)[ii] limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; and*

*146 (b) engineering operations [provided they preserve the Green Belt openness and do not conflict with the purposes of including land within it];*

6.5.9 These policies are reaffirmed in London Plan Policy 7.16, which also affords support for development which helps secure the objective of improving the Green Belt<sup>13</sup>, and Policy EM2 of the Hillingdon Local Plan: Part 1.

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<sup>13</sup> NPPF, 2018. Para 141.

6.5.10 The principle of each of the four development components of this application are thusly assessed against the NPPF exceptions with a view to ascertaining whether or not they constitute inappropriate development.

## Re-profiling of Existing Golf Course

6.5.11 The existing outdoor recreation use on the application site is well established. Ruislip Golf Course opened in 1936, thus pre-dating the Green Belt designation, and has since operated continuously. The reconfiguration of the course is required to ensure it can continue to operate compatible with, and alongside the new HS2 tracks to the south.

6.5.12 Works involve the installation of new ponds, tree lines and new ground re-profiling alongside a reconfigured golf course, putting green and practice course. To create the required topography, material derived from the adjacent HS2 works will be utilised. This will facilitate the creation of a high-quality golf course that, more flexible in its use than current, will appeal to a greater range of users. The works will also enhance the wider site's ecological and biodiversity values.

6.5.13 Such a schedule of works therefore complies with NPPF paragraph 145(b) in so far as the golf course typology alongside the ecological enhancements proposed is an outdoor use compatible with the Green Belt designation. In terms of "preserving the openness", paragraph 39 of the Judgments dated 16<sup>th</sup> March 2018 (Samuel Smith Old Brewery vs. North Yorkshire County Council) concludes that it is not the case that openness would only be preserved where it has been "left entirely unchanged". Rather, it is the case that any effects on openness as a result of development should not be harmful. Thusly, whilst the golf course works involve additional topography and landscaping which may alter perceptions of openness across the golf course, these effects are not considered visually or spatially harmful.

6.5.14 Similarly for the reasons above, NPPF paragraph 146 (a) is also relevant on the basis that works to reprofile the golf course comprises engineering works that preserve the Green Belt's openness and purpose. Accordingly, this element of the scheme and its associated uses therefore represent appropriate Green Belt development.

## Replacement of Driving Range

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

6.5.16 Whilst the old facility contained 40 bays, the new facility will contain 20 bays which are larger. This will meet modern standards; alongside adhering to the demands and flexibility of use required by LB Hillingdon's brief. The new facility will also include a ball washing area, teaching bay and video studio, again to bring the facility up to modern day standards and provide an additional revenue stream for the facility.

6.5.17 The driving range building with its individual bays is a piece of infrastructure dependant on the provision of an expansive driving range field. This will allow golfers to make the best use of the facility. The provision of the driving range is therefore considered compliant with NPPF paragraph 145(b) on the basis that it is a facility to be used in connection with and to complement the site's wider and continuing outdoor sporting function.

6.5.18 As above, NPPF paragraph 145(b) also requires any new development to preserve Green Belt openness. Whilst the new single storey building proposed at 4.5m is slightly taller at its highest point than the existing driving range, it presents a more compact built form and an overall smaller footprint that is substantially shorter than the existing facility. The new massing proposed will also be shifted slightly to the north east - closer to the existing houses further consolidating built form. The effect of this will allow for increased transparency and glimpses into the Green Belt from Ickenham Road where, currently, none exist due to the shielding created by the existing driving range building.

6.5.19 The new driving range building will be of a more robust construction than existing, with surrounding planting, landscaping and topography devised to ensure it fully integrates into its context. Accordingly and within the context of this area of the site, whilst the replacement facility will be marginally taller, overall it is considered the new driving range proposed, by virtue of its massing, location and materiality would positively impact openness. NPPF paragraph 145(b) is therefore fully complied with.

6.5.20 Alongside the above, NPPF paragraphs 145(d) and (g)[ii] are also relevant in so far as they concern the replacement of existing buildings or else the partial or complete redevelopment of previously developed land. With regards to point (d), the new building will be in the same use as existing. Whilst the height of the proposed structure is marginally greater, the overall footprint would be smaller, more compact and would not penetrate across the landscape to the same degree. Additionally, it represents a direct replacement and enhancement of the driving range structure currently in situ. It should also be noted that, in accordance with point (g)[ii], portions of the existing previously developed land that will no longer contain built massing by virtue of proposal's reconfiguration will be restored and landscaped back to open Green Belt.

6.5.21 The result will be a proposal that would not have a greater impact on openness than the existing development. Accordingly, this element of the scheme and its associated uses represents appropriate Green Belt development.

## Retention of Existing Car Park

6.5.22 The existing car park comprises a large expanse of hardstanding, and therefore constitutes developed land. It is understood the facility serves the Fairway Public House and Function Space (outside the remit of this application); the rifle range; the driving range; and the golf course. At the request of LB Hillingdon, no major reconfigurations or expansions are proposed to this car park neither are any major changes proposed to its capacity. Accordingly, its retention is acceptable and need not be assessed against policy.

## Replacement of Rifle Range

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

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

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

6.5.26 Compared with the existing rifle range building, the proposed development:

- will not result in any change to the operation of the existing building, in terms of its hours of operation or the number of members it currently serves;
- will be in the same use (*sui generis* – rifle range); and
- will be of a similar height and smaller footprint, and therefore not materially larger than the existing.

6.5.27 It is acknowledged that the rifle range does not relate to an outdoor sport use and therefore does not otherwise meet the NPPF exceptions for appropriate Green Belt uses. However, for the proposed physical development, when assessed against NPPF paragraphs 145(d) and (g)[ii] the proposal is fully compliant. It represents the replacement of a building already on Green Belt land; whereby the uses and operational requirements proposed would not change; and the overall proposed size would comprise a smaller footprint than the existing facility. Further and specific to paragraph (g), the new rifle range building will be located closer to existing built massing – infilling this area of the site and compacting the quantum of developed land in an area which already has a relatively built up character. It is therefore

considered the proposed rifle range would not have a greater impact on the openness of the Green Belt in compliance with the NPPF.

## Appropriateness of Development Conclusion

6.5.28 As set out above, the development proposes the re-profiling of the existing golf course, replacement of the driving range, retention of the car park, and replacement of the rifle range building. In all therefore, no additional functions or uses are proposed across the site with all current operations to either be retained in situ or else translocated into new premises proposed as part of this application.

6.5.29 Paragraph 39 of the Judgment for Samuel Smith Old Brewery vs. North Yorkshire County Council concludes that it is not the case that openness would only be preserved where it has been "left entirely unchanged". Rather, it is the case that any effects on openness because of development should not be harmful. With regards to the proposal therefore, perceptions of openness across the Site will be altered; as would visibility lines into and out of the Green Belt; and relationships with existing surrounding buildings by way of proposed built massing being compacted towards the south eastern corner of the site. However, this would not be visually or spatially harmful to the openness of the Green Belt; it would not conflict with the purpose of including the Site within the wider Green Belt designation; and it would not demonstrate encroachment into the countryside.

6.5.30 Cumulatively therefore and within the context of the wider site (which is to be much enhanced as part of this proposal), it is not considered that these effects will ultimately be detrimental from an openness perspective. The proposal as a whole therefore satisfies NPPF paragraphs 145(b), (d) and (g)[ii], and 146(b) and would not constitute inappropriate development.

6.5.31 However, should the Council adopt the stance that, the development is "inappropriate", Very Special Circumstances do indeed exist whereby any potential harms are clearly outweighed by the benefits of the proposal. This is set out below.

## Very Special Circumstances Consideration

6.5.32 Of all the uses proposed as part of this application, the one that risks being considered "inappropriate" is the erection of the new rifle range building – given that the golf course and golf driving range functions are otherwise Green Belt compatible. Accordingly, with a view to minimising adverse Green Belt impacts associated with this element of the proposal, this section sets out the following:

- The scale and quantum of the "inappropriate development" is the optimal necessary, thusly ensuring any potential harm caused by the proposal is minimal;
- That there are no suitable or viable alternative sites for this element of the development that would be more preferable in planning terms;

- A review of the Green Belt impacts and other impacts of the development as a whole – for which the inclusion of the rifle range forms a fundamental element.

### ***Development Quantum***

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

6.5.34 The existing rifle range was erected in 1957 and has served the club in this location since this time. However, in now replacing this facility it will be important to adhere to current design and safety standards as set out in the most recent National Small-bore Rifle Association (NSRA) advice note.<sup>14</sup> With this in mind, the requirements of the proposed rifle range are as such that a greater footprint is now required than that necessary when the facility was first constructed. In particular, the NSRA advice note highlights the need to provide adequate ventilation to control exposure to harmful substances including lead, unburnt propellant and carbon monoxide. Provision has therefore been made within the design to incorporate such systems. In addition, in order to comply with The Building Regulations<sup>15</sup>, accessible toilet facilities are also provided adding a further space requirement.

6.5.35 Mindful of the additional size requirements and the need to streamline the facility, the storage shed accompanying the original facility will no longer be provided. As a result, even with the proposed facility meeting modern standards of operation, the overall footprint (205sqm) is still more than 2sqm smaller than the existing - with any changes in height being negligible. This is therefore considered to be the optimal size required to allow for the replacement rifle range as part of this application.

### ***Development Location***

6.5.36 Ruislip Rifle Club was founded in 1944 and has operated from the existing rifle range since 1957, therefore representing a very established use in the Green Belt. The purpose of the club is to promote responsible participation in the sport of target shooting. It supports sportspeople of different ages and abilities through provision of equipment, coaching and instruction.

6.5.37 The club operates on a member only basis, for which a modest annual subscription is charged. The club is well utilised by the local community, currently catering to over 100 members - approximately 75 per cent of whom live within 5km of the existing site. It is the only competitive rifle club within LB Hillingdon and should therefore be considered an important local asset, providing the local community with access to unique recreation opportunities. A

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<sup>14</sup> NSRA (2016) Design, Construction and Maintenance of Target Shooting Ranges (4<sup>th</sup> ed.)

<sup>15</sup> HM Government (2015) The Building Regulations - Approved Documents G and M.

new facility is therefore essential as it would maintain and enhance these opportunities, continuing to serve the well-established demand.

6.5.38 The next nearest rifle range to the existing facility is 9km east in Harrow on the Hill. Whilst this is providing an interim facility to the members of the Ruislip rifle club until a new one is provided, this is not a sustainable long-term replacement given:

- The concentration of its existing members around the application site;
- The relatively poor accessibility between the sites by sustainable transport methods;
- The longer term need for dedicated, secure storage for the club's equipment; and
- The club's proud and historic association with Ruislip.

6.5.39 National, regional and local planning policy supports positive planning for the provision of community facilities and restricts the loss of existing facilities. Paragraph 92 of the NPPF states that planning decisions should "guard against the unnecessary loss of valued facilities and services", while Paragraph 97 states that existing recreational buildings should not be built on unless replaced by "equivalent or better provision...in a suitable location". Support for the safeguarding and enhancement of recreation facilities is similarly set out in London Plan Policy 3.19 and Policy EM5 of the Hillingdon Local Plan: Part 1.

6.5.40 The principle of providing a replacement rifle range facility within LB Hillingdon therefore upholds overarching principles which run throughout the relevant planning policy.

6.5.41 In this respect, recognising the Council's preference for a replacement facility to be located outside the borough's Green Belt<sup>16</sup>, the Ruislip Rifle Club commissioned Vail Williams LLP in November 2017 to undertake an exhaustive search of potential alternative non-Green Belt sites within the borough to determine if any were suitable or viable to accommodate the new rifle range. The results of this search are summarised in Table 10 below and set out in further detail in Appendix D.

6.5.42 As illustrated in Table 10, based on the particular requirements associated with a rifle range, no suitable alternative non-Green Belt sites were identified in LB Hillingdon within a 7km radius of the application site. This was deemed the maximum reasonable distance which the club could relocate without resulting in significant loss of members. Sites were discounted on a range of grounds, including safety risks to other tenants, potential amenity effects on neighbouring uses, as well as particular challenges around the configuration of floorspace or characteristics of the premises.

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<sup>16</sup> LB Hillingdon (15 February 2017) Pre-application advice RE: Relocation and replacement of rifle club (Ref: 580/PRC/2017/3).

No.	Address	Suitable	Justification
1	Tera 40, Auriol Dive, UB6 0TP	No	Multiple floors therefore unsuitable on safety grounds due to potential for multiple tenants in the building.
2	Units D6, Braintree Ind. Estate, HA4 0EJ	No	Available floor space split over two levels therefore insufficient space on one level.
3	Unit K, Braintree Ind. Estate, HA4 0EJ	No	The unit is on the edge of an industrial estate with residential units in close proximity to the industrial units. The club consider that there could be an effect on amenity of surrounding users if located here.
4	Unit 8, South Harrow Ind. Estate, HA2 8AX	No	Multiple floors therefore unsuitable on safety grounds due to potential for multiple tenants in the building.
5	Unit 10 Cowley Mill Road, UB8 2GG	No	Available floor space split over two levels therefore insufficient space on one level.
6	Unit 22-23 Uxbridge Trade Park, UB8 2GG	No	Insufficient floorspace on mezzanine floor and too greater space on ground floor. Unsuitable for ground floor to be split due to rifle club's requirements and more suitable as warehouse/distribution space.
7	Unit 18, Derby Road, UB6 8UP	No	When details reviewed from letting agent, unsuitable due to only first floor offices being available which have a glazed elevation which is unsuitable for a rifle range.
8	Units 12 and 14, Derby Road, UB6 8UJ	No	Available floor space split over two levels therefore insufficient space on one level.
9	Unit G, Field Way, UB6 8UN	No	Insufficient floorspace on first floor and too greater space on ground floor. Unsuitable for ground floor to be split due to rifle club's requirements and more suitable as warehouse/distribution space.

Table 10 Summary of search undertaken for alternative non-Green Belt sites

6.5.43 As the club cannot be accommodated on non-Green Belt land within LB Hillingdon, it is considered that the application site remains the most suitable location for the proposed rifle range. The proposed layout of the application site means that the replaced rifle range can continue to benefit from the existing car parking and vehicular access, which will not be altered as part of the proposed development. This avoids any need for additional land-acquisition<sup>17</sup> or to obtain planning permission for additional built-development in the Green Belt, which would neither be feasible nor economically viable for Ruislip Rifle Club given the limited financial resources available to it.

<sup>17</sup> Beyond that provided by HS2 under the requirements of U&A ref 2832\_15.

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

### ***Impacts of Development***

6.5.45 With it confirmed that the proposal includes the optimum quantum and location for the replacement rifle range facility, this section explores both the overarching Green Belt impacts alongside any other impacts that would result from the development as a whole. From this, a planning balance can then be ascertained as to whether or not the benefits do indeed outweigh the harms and, thusly, if Very Special Circumstances can be applied.

#### ***Green Belt Impacts***

##### ***Benefits***

- The adjacent HS2 works would adversely impact the usability of the Ruislip Golf course, whilst also resulting in the loss of the rifle range. This application therefore seeks works to ensure the golf course and rifle range can continue to operate in an enhanced setting – with upgraded facilities to appeal to a broader range of people. This will therefore ensure the permanence of this portion of Green Belt; stopping the open land becoming unused and falling into dereliction; and negating the possibility of gradual encroachment from the existing adjacent residential area. This therefore upholds NPPF paragraphs 134 (c) and (e) which confirms the fundamental purposes of the Green Belt;
- New and enhanced Public Rights of Way which form part of the proposed development will improve access to the Green Belt, providing new walking routes around the application site. Alongside this, a number of biodiversity and ecological enhancements are also proposed. This therefore accords with NPPF paragraph 141, which requires local authorities to plan positively to enhance the Green Belt's beneficial use through the enhancement of access, recreational uses and biodiversity.
- The context of the south eastern portion of Green Belt is more urban in character due to the existing car park, club house, Clacks Lane and Ickenham Road flyover immediately to the south-east (the latter of which is located outside of the application site). Furthermore, the presence of the Chiltern Line railway to the south of the site provides an urbanising influence. As such, by compacting built form proposed as part of this application towards this corner, closer to the existing urban built context, the effect will be a wider positive impact on Green Belt openness. This will also allow for additional viewpoints into the Green Belt from Ickenham Road and a much condensed area of built form visible from the wider golf course.

- The reduction in size and length of the new driving range will provide a net increase in open greenfield land, with a resulting built mass that does not encroach as far into the Green Belt.

#### *Harms*

- A localised loss of greenfield land as a result of the rifle range being relocated to a new position. However, as the new rifle range is slightly smaller than the original, as a net quantum there would in actuality be a slight gain in greenfield land.
- Localised changes to the perception of visual openness adjacent to the new rifle range and the slightly relocated driving range. These impacts however would diminish quite significantly into the wider golf course. Notwithstanding, a comprehensive landscaping strategy has been devised that will see planted buffers around these buildings. This will screen the new built massing from long views.

#### *Other Impacts*

##### *Benefits*

- The proposal would ensure the existing golf course can continue compatible with the adjacent HS2 development. Furthermore, enhancements such as the improved driving range and practise putting field will increase the appeal and usability of this site to a greater number of users. This will have economic benefits for the borough, ensuring a revenue stream can continue to be derived from this land. This should be noted alongside the implications of this application being refused, which would likely result in the closure of the golf course in its entirety.
- The rifle club, as the only competitive rifle club within LB Hillingdon, provides the local community with access to unique recreation opportunities. It should therefore be considered an important local asset. The new rifle range proposed with this application will continue to serve this well-established need – replacing that which was lost as part of the HS2 works. The new rifle range on the application site should be considered alongside the fact that there are no other viable or alternative non-Green Belt sites within the borough where this can be relocated.
- The new facilities across the site will be constructed to a high quality in line with modern safety and usage standards. This will ensure their long term, safe and sustainable operation. Particularly with regards to the rifle club, now meeting modern safety standards will allow the club to retain its license and operate legally.
- The design and materiality of both the rifle club and driving range will be as such to respect the Green Belt designation with a materiality that reflects the green and open setting. This will ensure the character of this portion of the Green Belt retains a degree of non-urban quality.

- The new landscape works proposed as part of this application will involve a significant tree planting strategy, grade reprofiling and the managed creation of new habitats. In addition, new ponds, stream corridors and drainage areas will also be created. The result will be a site that is substantially enhanced from an ecology, biodiversity and drainage perspective. This would contrast with a scenario whereby, if this application were to be refused, the existing golf course would at best become of poorer quality. And at worst, become unusable and unmanaged.

#### *Harms*

- The putting practise field be subject to a more intensive use than that of the regular golf course. Locating this the rear of existing houses therefore may result in mild amenity issues with regards to noise. This can however be mitigated through landscaping and planting.
- The new rifle range would be located closer to existing houses which may result in mild amenity issues with regards to noise. This can however be mitigated by an appropriate landscaping buffer and planting.
- Dust and noise issues may result from the re-profiling of the golf course. These impacts can however be mitigated through the correct use of materials (as set out in the submitted Materials Management Plan) and through construction best practise.
- When the golf course is closed pending reprofiling, a risk is that it becomes overgrown and unsightly. In this respect, the submitted Management and Maintenance Plan sets out how the golf course environment will be managed to ensure this does not occur.

### **Very Special Circumstances Conclusion**

6.5.46 As set out above, the only Green Belt harms that would result from the proposal are localised to the south eastern corner in an area which, due to the surrounding built context, is already generally urban in nature. Furthermore, any negligible and localised impacts on openness or visual amenity can be mitigated through the use of landscaped screening and planting buffers.

6.5.47 Conversely, the benefits are far reaching and impact on the entirety of the Green Belt site. It involves a comprehensively enhanced and landscaped golf course with improved access, driving range with larger bays to appeal to a greater number of users, and a rifle club that meets modern safety standards. These will ensure the site can continue to be used to its fullest capability – compatible with the adjacent HS2 development. The alternative will be the golf course would operate to a much lesser quality (or else, as a worst case, may have to close) and the rifle club would not be provided at all.

6.5.48 In terms of other harms not otherwise related to Green Belt, this all regard potential amenity impacts resulting either from construction; or else from locating the new and potentially more

intensively used functions closer towards existing residential units. However, adverse impacts in all these regards can be sufficiently mitigated through sufficient landscaping and planting buffers, and management plans.

6.5.49 In terms of benefits not otherwise related to Green Belt, again, these are far reaching. They include the economic, social and community benefits associated with retaining and redeveloping these enhanced facilities. Similarly, from a design perspective the driving range and rifle range buildings will be designed to a high quality that respects the sensitive context – an improvement from the lesser quality buildings currently on site.

In summary therefore, whilst any harms (both Green Belt related and otherwise) are minor, can be sufficiently mitigated against, and are localised only to the south eastern corner, the benefits are far reaching both across the site and into the wider borough. In accordance with NPPF paragraph 144 therefore, in the event that LB Hillingdon do consider the proposal to be “inappropriate”, it is considered that the potential harm to the Green Belt and other harm resulting from the proposal is clearly outweighed by the benefits. Very Special Circumstances therefore exist to support this application.

## Sport and Recreation Uses

6.5.50 The proposed development will enhance the playability of Ruislip Golf Course and introduce a range of new facilities designed to improve the golfing experience for its users.

6.5.51 While it is acknowledged that the proposed development will result in a net reduction in the number of holes, from 18 to nine, the new nine hole course incorporates a range of new features which are designed to challenge and inspire golfers across a range of different abilities. This includes new water hazards, changes in elevation/topography, and a range of different hole lengths. Furthermore, the provision of four teeing positions for each hole will enable users to continue to play 18 hole rounds, somewhat mitigating the reduction in the course length.

6.5.52 During the financial year 2017/18, precipitation affected play at Ruislip Golf Course on 39 days; the effect was such that fewer than five rounds of golf were played on two thirds of these days.<sup>18</sup> The proposed development will raise the tees, fairways and greens to enable improved drainage and ensure year-round playability, thus mitigating the loss of play often experienced by the course during high rainfall events.

6.5.53 It is therefore considered that the proposed development offers substantial enhancements to Ruislip Golf Course and will provide a high-quality golfing experience for both local residents and visitors from further afield. As highlighted previously, the provision and enhancement of recreational facilities is supported by NPPF Section 8, London Plan Policy 3.19, and Local Plan: Part 1 Policy Cl2.

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<sup>18</sup> Golf Hillingdon, July 2018. *Course play affected by rain or snow data.*

6.5.54 In addition, the proposed development includes re-provision of the rifle range, replacing the existing building which will be demolished as part of the HS2 development.

6.5.55 In line with London Plan Policy 4.6<sup>19</sup>, the proposed development is designed to be fully accessible, both on foot through the provision of enhanced, surfaced footpaths throughout, and via buggy. The new academy course and range of practice facilities will create valuable new opportunities for participation in golf, fostering a healthier and more sustainable local community. This also accords with London Plan Policy 3.2, which emphasises that new development should be designed and managed in ways that improve health and promote healthy lifestyles.

## Built Design

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

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

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

6.5.59 Section 12 in the NPPF sets out the requirement for proposals to be well designed and high quality. Paragraph 127 specifically, notes that developments should contribute positively to an area – being visually attractive, incorporating sufficient landscaping, sympathetic to the opportunities and constraints of its context, and being safe, accessible and inclusive for all.

6.5.60 The importance of good design in any new development is reiterated in current London Plan Policies 7.4, 7.5 and 7.6, which note that proposals should be designed to provide the highest quality spaces that contribute positively to the surrounding public realm. At a local level,

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<sup>19</sup> See also: London Plan, 2016. Policy 7.2 An inclusive environment.

Policy BE1 in Hillingdon's Strategic Policies document stipulates the requirement for all new development to improve and maintain the quality of the built environment.

6.5.61 As set out above, the proposed buildings have been designed for modern usage, in line with current demand. Their form and materiality are as such to allow for robustness, whilst their configuration and location are as such to ensure they do not adversely impact on the visual amenity of the wider Site. The proposed built design is therefore fully policy compliant.

## Materials Management

6.5.62 The new design for the golf course aims to create an interesting and challenging course while also dealing with drainage and flood issues. This results in some cut and fill across the site. In general levels rise and there is a deficit of 50,000m<sup>3</sup> of material to achieve the design ambition.

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

6.5.64 The data obtained from the ground investigation at the Portal site has not identified any significant contamination. It is proposed that the excavated material are reused using the CL:AIRE Definition of Waste Code of Practice under a full Materials Management Plan in accordance with the HS2 Materials Management Plan Framework. This approach has been agreed with the Environment Agency. More details on the proposed approach to the import of materials can be found in the Outline Material Management Plan which accompanies this application.

## Flood Risk and Drainage

6.5.65 The proposed development is considered flood resilient and resistant, and any residual risk can be safely managed. Parts of the application site fall within Flood Zones 2 and 3 on the EA Flood Maps; these areas are considered to have a higher probability of flooding. In line with Planning Practice Guidance requirements and those set out in Policy 5.12 of the London Plan and Policy DMIE 9 of the Hillingdon Local Plan: Part 2, a Flood Risk Assessment was carried out and accompanies this planning application.

6.5.66 Most of the application site (approximately 90 per cent) is within Flood Zone 1 (low flood risk), while the remainder of the application site is within the River Pinn floodplain (Flood Zones 2 and 3) and at a higher risk of flooding. In line with Policy EM6 of the Hillingdon Local Plan: Part 1, those parts of the proposed development that would be vulnerable to flooding have been directed away from Flood Zones 2 and 3. The playable parts of the golf course, which are classified as water-compatible in Paragraph 066 of the Planning Practice Guidance (PPG)<sup>20</sup>,

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<sup>20</sup> MHCLG (2014) PPG Paragraph: 066 Reference ID: 7-066-20140306, Table 2.

are limited to Flood Zones 2 and 3a and thus considered to be appropriate development. The parts of the application site within Flood Zone 3b, those areas at highest risk of flooding, are in a natural state and form part of the riverbed. No development is proposed in these areas, in line with the national standing advice on flood risk<sup>21</sup> and Hillingdon UDP Policy OE7.

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

6.5.68 Policy 14 of the NPPF states that SUDS should be incorporated into developments at risk of flooding (unless evidenced as inappropriate), a requirement which is also transposed into Policy 5.13 of the London Plan. This also requires that drainage assists in delivering other policy objectives related to water efficiency and quality, biodiversity, and amenity and recreation.

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

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

6.5.71 A water harvesting system has been incorporated into the design to collect and store water on the application site, including provision of three ponds and three tanks to store water together with flow control outlets. Approximately 14,000m<sup>3</sup> of storage capacity will be provided, sufficient to irrigate the course for 100 days without precipitation. This will enhance the efficiency of water usage by Ruislip Golf Course, ensuring that rainwater is collected and reused and reducing the requirement for mains water or groundwater to irrigate the course.

6.5.72 It is considered that the proposed development meets, and exceeds, the requirements for drainage set out in both the NPPF and the London Plan. It also makes a significant

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<sup>21</sup> Department for Environment, Food & Rural Affairs / Environment Agency (2012) Flood risk assessment: standing advice

contribution towards the requirement set out in Policy EM8 of the adopted Hillingdon Local Plan: Part 1, which requires new development to demonstrate incorporation of water efficiency measures, including water recycling and collection facilities.

6.5.73 In line with Policy DME1 11 of the Hillingdon Local Plan: Part 2, the Geoenvironmental Desktop Study has considered potential risks to the Source Protection Zone 1 (inner zone), located in the western part of the application site. The Study found that the contamination risk to groundwater resources is very low.

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

## Ecology and Trees

6.5.75 Policy 15 of the NPPF states that developments securing measurable net gains for the environment should be supported. London Plan Policy 7.19 affirms that development proposals should avoid adverse effects on biodiversity before considering mitigation, a principle which has underpinned the design for the proposed development. This is in line with Policy G6 in the Draft New London Plan (with suggested minor changes), which states that biodiversity enhancement should be considered from the start of the development process. Ecological habitat retention, enhancement and creation are key principles which have underpinned the design process for the proposed development from inception.

6.5.76 This is particularly pertinent in the context of the application site, which includes the West Ruislip Golf Course and Old Priory Meadows Nature Conservation Site of Borough Grade II Importance (SINC). In line with saved Policy EC2 of the Hillingdon UDP, an Ecological Assessment is provided which accompanies this planning application.

6.5.77 This designation was taken into account from the outset, and the design has sought to mitigate effects upon the SINC and, where possible, avoid development within or adjacent to the designated area. This is in line with Policy EM7 of the adopted Hillingdon Local Plan: Part 1 and saved Policy EC3 of the Hillingdon UDP.

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

- the incorporation of a 30m buffer zone around an identified badger set in the north-eastern part of the application site, with no works to be undertaken within this area;

- the retention of trees highlighted as having the highest ecological habitat value, in particular those with the potential for bats.

6.5.79 While some tree felling will be required to incorporate the new nine hole golf course, the evolution of the design has sought to minimise this wherever possible. Furthermore, a total of 153 new trees and 9,171 tree 'whips', all native species relevant to the local context, will be planted as part of the proposed development. This will ensure a substantive net increase in the number of trees on the application site. This satisfies and surpasses the requirements in Policy 7.21 of the London Plan for trees of value to be retained and losses replaced; similarly, the requirements in saved Policy OL26 of the Hillingdon UDP and Policy DMHB 14 of the Hillingdon Local Plan: Part 2.

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

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

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

6.5.82 In combination, the ecological mitigations and enhancements incorporated into the design are considered to meet the requirements set out in national, regional and local plan policies. In particular, the proposed development will protect and enhance the identified SINC, as well as habitats and features of biodiversity value throughout the wider application site, in line with Policy EM7 of the adopted Hillingdon Local Plan: Part 1 and Policy DMEI 7 of the Hillingdon Local Plan: Part 2.

## Green and Blue Infrastructure

6.5.83 Policy 8 of the NPPF supports the achievement of healthy, inclusive and safe places which enable and support healthy lifestyles, for example through the provision of safe and accessible green infrastructure. This is reiterated in the London Plan, Policy 2.18 of which encourages the creation of new green infrastructure and the integration of this into London's wider network green infrastructure network and the public realm.

6.5.84 The existing site is a strategically important piece of green infrastructure, permeating into the urban form of London. It serves an important recreational functional, both within Hillingdon and within the wider sub-region. It incorporates two longer distance footpaths, the Celandine

Route and the Hillingdon Trail, which provide public access to green spaces and valued habitats, including the SINC as highlighted in the *Ecology and Trees* section above.

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

6.5.86 The creation of a new PRoW through the southern part of the application site will further improve public access, and furthermore will enhance the connection between the site and the wider public realm in line with Policy 2.18 of the London Plan.

6.5.87 While the proposed development does not create new green infrastructure *per se*, it will enhance the landscape character and biodiversity of this important piece of existing green infrastructure, in line with the vision set out in the All London Green Grid SPG.

6.5.88 Policy 7.28 of the London Plan encourages the restoration and enhancement of London's 'Blue Ribbon Network', which includes the River Pinn. This requirement is transposed into Policy EM3 of the Hillingdon Local Plan: Part 1, which furthermore promotes the positive enhancement of wildlife and habitats associated with the strategic river network.

6.5.89 The proposed development will restore the Ickenham Stream, a former feeder canal which currently serves little function in drainage or ecological terms. The proposed development incorporates the realignment of the Ickenham Stream and its restoration as a functioning part of Hillingdon's blue infrastructure. The stream, and associated ponds, will be multifunctional, providing an ecological drainage channel and allowing for water storage.

6.5.90 In addition, enhancements are proposed to the existing SINC along the River Pinn, with the design incorporating new wetland and water meadow habitats around the realigned Ickenham Stream and the River Pinn floodplain, enhancing the role of the river as a vital wildlife corridor for Hillingdon.

6.5.91 Overall, it is considered that the proposed development makes a substantive contribution to the enhancements promoted through London Plan and Hillingdon Local Plan: Part 1 policies, and satisfies the requirements set out in saved Policy BE34 of the Hillingdon UDP.

## Heritage

6.5.92 There are three Grade II listed buildings approximately 150m to the north of the application site, and two locally listed buildings around 50m to the north. As set out in section 2 of the Design and Access Statement, these assets are visually screened from the application site by dense understorey and mature tree planting along the northern and southern banks of the

River Pinn, which will not be affected as part of the proposed development. Whilst some earthworks are included in the design directly to the south of these assets, these are minor in scale and will not adversely affect the settings of the assets.

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

6.5.94 The design has responded to the requirements set out in saved Policy BE4 of the Hillingdon UDP and Policy DMHB 4 of the Hillingdon Local Plan: Part 2, which require development on the fringes of CAs to preserve or enhance the character or appearance of the area. The design does not result in requirements for tree felling or earthworks to the north-east of Clacks Lane. This is the only part of the application site with any visual linkage to the locally listed building or CA due to the presence of dense tree planting along Clacks Lane, which screens longer views from the rear of properties on Sharps Lane and Hill Rise to the wider application site.

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

6.5.96 The design also retains the most valuable Ridge and Furrow landscape located to the north of the application site. BE38 of Hillingdon's UDP Saved Policies which requires development proposals to retain and utilise topographical and landscape features of merit.

## Transport

6.5.97 In accordance with Policy 6.3 of the London Plan and Policy DMT1 of the adopted Hillingdon Local Plan: Part 1, a Transport Statement has been produced and submitted with this application, which considers the impact of the development on the existing transport network. This has been prepared in accordance with guidelines detailed in TfL's Transport Assessment Best Practice Guidance, which sets out thresholds, outside of which Applicants must provide workplace and/or residential travel plans.

6.5.98 Traffic surveys undertaken to inform the Transport Statement found that, currently, the total AM peak vehicular two-way movements for the application site equate to 21, with 42 in the PM peak hour and a total of 57 during the Saturday peak hour. It is anticipated that the proposed development will result in a modest increase in visitor trip generation owing to the changes in the maximum throughput capacity of the golf course. As such, the impact of the development proposals on the local transport network will be negligible, resulting in a maximum increase in vehicle flows on B466 Ickenham Road of 3 per cent during operation of the proposed development.

6.5.99 The average construction traffic flows over the proposed 36-month construction period will generate 32 vehicles movements per month (just over one per day), which will fluctuate across the construction period. In line with the supporting text for Policy DMT 7 of the Hillingdon Local Plan: Part 2, construction management and logistics measures will be implemented to ensure compliance with planned routing, delivery, access and safety standards. Construction vehicle movements associated with the golf course will be considered by HS2 Ltd. as part of the overall number of construction vehicle movements and limits which these are subject to.

6.5.100 It is therefore considered that the existing vehicular access to the highway network is safe and efficient, in line with Policy DMT 2 of the Hillingdon Local Plan: Part 2, and that no mitigation measures are required to address traffic impacts. Furthermore, some 160 parking spaces are already provided in a car park adjacent to the club house (accounting for the 40 which have been removed due to HS2 development). Given the proposed development will result in a minimal change in visitor trip generation, it is anticipated that these will cater adequately for future demand.

## Inclusive Access

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

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

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

## 7 Summary and Conclusions

7.1.1 This Planning Statement has been prepared in support of the support the planning application for Ruislip Golf Course. Construction of HS2 will result in land take from the golf course. This application seeks permission for the reconfiguration of the golf course and construction of a replacement rifle club facility in line with U&As that were agreed with LB Hillingdon (and which eventually formed part of the Hillingdon Agreement) during the passage of the Hybrid Bill through parliament.

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

7.1.3 The application site has provided opportunities for sport and recreation for nearly 100 years. The proposed development will maintain and enhance two valued local recreational facilities; Ruislip Golf Course and Ruislip Rifle Club. The practice areas and academy will enable the golf course to become even more accessible to young and beginner golfers. Overall, the proposed development will promote accessible routes into sport in line with wider ambitions to encourage greater participation in sport.

7.1.4 The entirety of the site is designated Green Belt land so whilst a priority has been the reconfiguration of the golf course to ensure a challenging new gaming experience; and a replacement rifle range that meets all relevant safety standards, this has been underpinned by landscaping works and ecological enhancements that, cumulatively, will ensure the principles of the Green Belt designation can still be upheld. In this regard, the proposed development will result in a number of notable benefits to the Green Belt site:

- The retention of the existing uses across the site in a way that is compatible with the adjacent HS2 works. This will ensure the existing uses do not fall into disrepair and become derelict.
- Substantial enhancements and interventions to improve access, ecology and biodiversity across the Green Belt site – providing a much higher quality natural environment that will appeal to a greater number of users.
- The condensing of the proposed built form closer towards the south eastern corner of the Green Belt site which, by its very context, is more urban in nature. This will have a positive impact on the Green Belt site as a whole, providing a far reaching greater sense of openness. In this respect, it should also be noted that both the replacement driving range and rifle range proposed have smaller footprints than the existing facilities.

7.1.5 The proposal will also result in benefits that, otherwise, do not relate purely to its Green Belt designation. These include:

- The economic and community benefits of reprofiling the rifle range and golf club as modern and flexible facilities that will appeal to a broader range of people. This is relevant to the rifle club more significantly as this is the only such facility in LB Hillingdon.
- The design of the new buildings will be of a high quality, and aesthetically pleasing with a view to respecting the sensitivity of their context.
- The new landscape works proposed as part of this application will involve significant tree planting, grade reprofiling, new habitats and also the creation of new ponds.
- The result will be a site that is substantially enhanced from an ecology, biodiversity and drainage perspective.

## 8 Appendices

## Appendix A: Schedule of Drawings

Title	Drawing Number
General arrangement plan	1MCo4-SCJ-EV-DGA-SS05_SL07-240400
Location plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241000
Site plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241001
Existing golf course layout	1MCo4-SCJ-EV-DPL-SS05_SL07-241002
Isopachyte plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241100
Existing topography plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241110
Existing public right of way plan	1MCo4-SCJ-DR-DPL-SS05_SL07-241150
Indicative tree removal plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241200
Construction works plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241210
Irrigation plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241300
Proposed topography plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241500
Driving range fence plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241501
Driving range lighting plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241502
Driving range building plan	1MCo4-SCJ-EV-DSE-SS05_SL07-241503
Proposed Public Right of Way plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241550
Tree planting plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241600
Soft planting plan	1MCo4-SCJ-EV-DPL-SS05_SL07-241610
Typical landscape details	1MCo4-SCJ-EV-DSE-SS05_SL07-242200
9 hole course - Section location plan	1MCo4-SCJ-EV-DSE-SS05_SL07-242210
9 hole course - hole 1 of 9	1MCo4-SCJ-EV-DSE-SS05_SL07-242211
9 hole course - hole 2 of 9	1MCo4-SCJ-EV-DSE-SS05_SL07-242212
9 hole course - hole 3 of 9	1MCo4-SCJ-EV-DSE-SS05_SL07-242213
9 hole course - hole 4 of 9	1MCo4-SCJ-EV-DSE-SS05_SL07-242214
9 hole course - hole 5 of 9	1MCo4-SCJ-EV-DSE-SS05_SL07-242215
9 hole course - hole 6 of 9	1MCo4-SCJ-EV-DSE-SS05_SL07-242216
9 hole course - hole 7 of 9	1MCo4-SCJ-EV-DSE-SS05_SL07-242217
9 hole course - hole 8 of 9	1MCo4-SCJ-EV-DSE-SS05_SL07-242218
9 hole course - hole 9 of 9	1MCo4-SCJ-EV-DSE-SS05_SL07-242219
Academy course profile	1MCo4-SCJ-EV-DSE-SS05_SL07-242230
Putting green and short game profile	1MCo4-SCJ-EV-DSE-SS05_SL07-242240
Rifle range sections	1MCo4-SCJ-EV-DSE-SS05_SL07-242350
Ickenham Stream and pond key plan	1MCo4-SCJ-EV-DSE-SS05_SL07-242700
Ickenham Stream and pond profile	1MCo4-SCJ-EV-DSE-SS05_SL07-242701

## Appendix B: Suitability of Alternative Sites Outside the Green Belt

As part of the process, initially sites within a set radius were considered for suitability in order to establish whether the rifle club could be relocated to an alternative premises which was outside the Green Belt. In order to undertake this process, the club set out their criteria for the requirements of their premises.

In order to provide a 23m (25 yard) shooting range which is a required length for the shooting range, the building must be a minimum length of 30m taking into account standing area and a stop butt.

- As the minimum length of unit was 30m, a size range that the club would consider appropriate would be between 300m<sup>2</sup> and 500m<sup>2</sup>.
- The club's existing premises is freehold and therefore the club would prefer to have another freehold building. If this is not possible they may accept a long leasehold with a peppercorn rent if the building was suitable. The club could not however afford to pay a full market rent.
- The relocated premises should be within 7km of the existing site to ensure the club do not lose a significant number of members as a result of the relocation. This also ensures the Borough will not lose this sports and leisure facility.
- The building should be single storey or should not have multiple tenants i.e. for safety reasons there cannot be alternative tenants on upper floors within the building.
- The building should not be within close proximity of residential dwellings to ensure the effect on residential amenity is not affected.

An availability search was undertaken on 7<sup>th</sup> November 2017 to establish what commercial properties were available within a 7km of the existing site. The results have been set out in Appendix 1 and a total of 12 properties were found.

The results of the search are based on available sites within the defined radius, this does not take into account the need for any permissions for planning or landlord consent which would be required to change any unit to a rifle club.

The summary of each property has been set out below and whether the site is considered appropriate based on the criteria above.

No.	Address	Suitable	Justification
1	Tera 40, Auriol Dive, UB6 0TP	No	Multiple floors therefore unsuitable on safety grounds due to potential for multiple tenants in the building.
2	Units D6, Braintree Ind. Estate, HA4 0EJ	No	Available floor space split over two levels therefore insufficient space on one level.
3	Unit K, Braintree Ind. Estate, HA4 0EJ	No	The unit is on the edge of an industrial estate with residential units in close proximity to the industrial units. The club consider that

No.	Address	Suitable	Justification
			there could be an effect on amenity of surrounding users if located here.
4	Unit 8, South Harrow Ind. Estate, HA2 8AX	No	Multiple floors therefore unsuitable on safety grounds due to potential for multiple tenants in the building.
5	Unit 10 Cowley Mill Road, UB8 2GG	No	Available floor space split over two levels therefore insufficient space on one level.
6	Unit 22-23 Uxbridge Trade Park, UB8 2GG	No	Insufficient floorspace on mezzanine floor and too greater space on ground floor. Unsuitable for ground floor to be split due to rifle club's requirements and more suitable as warehouse/distribution space.
7	Unit 18, Derby Road, UB6 8UP	No	When details reviewed from letting agent, unsuitable due to only first floor offices being available which have a glazed elevation which is unsuitable for a rifle range.
8	Units 12 and 14, Derby Road, UB6 8UJ	No	Available floor space split over two levels therefore insufficient space on one level.
9	Unit G, Field Way, UB6 8UN	No	Insufficient floorspace on first floor and too greater space on ground floor. Unsuitable for ground floor to be split due to rifle club's requirements and more suitable as warehouse/distribution space.
10	Unit 45, Norwich Road, UB6 8UB	No	Currently occupied, unclear when lease ends.
11	St Peter's Road, UB8 3SD	No	Unit located within a predominantly residential area with residential surrounding the unit. The building is therefore considered unsuitable due to potential impact on surrounding amenity.
12	Unit 4 Waterloo Road, UB8 2RA	No	Available floor space split over two levels therefore insufficient space on one level.

Following a review of available sites which have been assessed against the requirements for the rifle club, it can be concluded that there are no suitable alternative sites. As a consequence, the only appropriate to ensure the club remains within the Borough to provide a new building for the club.

The proceeding sections of this report will therefore consider how the proposal is appropriate Green Belt development.

Document Title: Planning Statement - Ruislip Golf Course S2

Document no.: 1MCo4-SCJ-PL-STA-SS05\_SL07-000001

Revision: Co3