

## **The Royal Automobile Club, Old Barn Road, Epsom KT18 7EW**

Construction of a lined reservoir for golf course irrigation with landscaping and associated works, apparatus and engineering operations.

<b>Ward:</b>	<b>Woodcote Ward;</b>
<b>Head of Service/Contact:</b>	<b>Ruth Ormella, Head of Planning</b>

### **1 Plans and Representations**

- 1.1 The Council now holds this information electronically. Please click on the following link to access the plans and representations relating to this application via the Council's website, which is provided by way of background information to the report. Please note that the link is current at the time of publication, and will not be updated.

Link: <http://eplanning.epsom-ewell.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PCQ9BFGYKLH00>

### **2 Summary**

- 2.1 The application seeks the construction of a lined reservoir for golf course irrigation at Woodcote Park, Epsom. The purpose of the reservoir is to reduce reliance on mains water supply.
- 2.2 Planning permission was granted on 14 January 2013 for a reservoir in the same location, under reference 12/00801/FUL. The planning permission was not implemented and expired on 14 January 2016. The original scheme sought planning permission for a 4.49 million gallon reservoir, whereas this application seeks permission for a 6 million gallon reservoir, by excavating deeper.
- 2.3 The below table sets out the variation between the expired planning permission (12/00801/FUL) and the proposed reservoir:

	<b>This Application</b>	<b>Expired Planning Permission (12/00801/FUL)</b>
Site area	1.70ha	1.189ha
Size of reservoir	6 million gallons	4.49 million gallons
Total surface area	6,701m <sup>2</sup>	7,260m <sup>2</sup>
Water stored above ground	10,004m <sup>3</sup>	9,655m <sup>3</sup>
Water level (depth)	7.4m	6m

	This Application	Expired Planning Permission (12/00801/FUL)
Depth (at deepest point)	7.4m	4.5m below ground level
Depth (at shallowest point)	0m	3.5m below ground level
Maximum length (top) (outer crest to outer crest)	113m	121m
Maximum width (top) (outer crest to outer crest)	75m	99m
Maximum length (base)	127m	55m
Maximum width (base)	94m	36m
Embankment Height (above existing ground level)	1.84m – 3.47m	3.51m
Secondary Bund Max Height (maximum height)	2.5m	2m
Embankment Banks Flat top width	3m	4m

## Site description

### *Site Context*

- 2.4 The application site ('Site') is set within the grounds of Woodcote Park, located off Wilmerhatch Lane in Epsom, Surrey. Woodcote Park measures approximately 350 acres and comprises a Grade II\* Listed building, two 18-hole golf courses, a sports centre and various outbuildings and structures, some of which are also listed.
- 2.5 Woodcote Park is bound by Baron's Hurst and Warren Hill to the north, Chalk Lane to the east, Langley Vale Road to the south and Headley Road and Wilmerhatch Lane to the west. Also to the west of the site is the Ridge, which is a linear development comprising 29 detached dwellings, each contained within sizable plots.
- 2.6 The wider surrounding area comprises open countryside, residential settlements and towns and villages. Specifically, Epsom Town Centre is to the north-west of Woodcote Park and the village of Ashted is to the west of the Park. Epsom and Walton Downs is to the east of the Park, which comprises Epsom Downs Racecourse.

- 2.7 Woodcote Park is well connected with good links to the M25, A24 and B290. It also has good rail accessibility, with Epsom Railway Station, Tattenham Corner Railway Station and Ashted Railway Station located in close proximity. There are various informal footpaths running through Woodcote Park and public rights of way on Headley Road and Langley Vale Road.

#### *Application Site*

- 2.8 The application site ('Site') measures approximately 1.7ha and is broadly rectangular in size. It is located in the south-western part of Woodcote Park and currently comprises vacant land. The Site is broadly flat, albeit with an undulating surface. It is designated as Green Belt and a Grade 3 Site of Nature Conservation Interest (SNCI).
- 2.9 Immediately to the south of the Site is an estate maintenance area, where machinery is stored and activities such as wood chipping carried out. This area will remain in use. Immediately to the west of the Site are overhead power lines, which run north-south. The reservoir has been designed to ensure that there will be no impact on the power lines. There is also an underground power cable that crosses the site. It is proposed that this will be relocated by the relevant statutory provider in advance of the reservoir development coming forward.
- 2.10 The Site itself (including the estate maintenance area and overhead power lines) is enclosed by trees and shrubs, which provide screening from the wider Woodcote Park Site. Beyond the tree enclosure are two rectangular grassed plots to the north, the Coronation Golf Course to the east and a driveway to Headley Road to the west.

#### *Access*

- 2.11 The site is currently accessed by buggy from Woodcote Park. It can also be accessed via a secure gate off Headley Road, to the west of the Site. The access to the site will remain following the installation of the reservoir and only members and staff will have authority to access this.

### **3 Proposal**

- 3.1 This application seeks the construction of a lined reservoir for golf irrigation at Woodcote Park. The purpose of the reservoir is to reduce reliance on mains water supply for irrigating the golf courses.
- 3.2 Planning permission was granted on 14 January 2013 for a reservoir in the same location, under reference 12/00801/FUL. The planning permission was not implemented and expired on 14 January 2016. The original scheme sought planning permission for a 4.49 million gallon reservoir, whereas this application seeks permission for a 6 million gallon reservoir, by excavating deeper.

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3.1 The accompanying Design and Access Statement sets out that reservoir will have a maximum depth of 6m at its maximum. The banks will extend to 3.47m in height at its highest, although lower than in other parts given the change in topography across the Site. The height of the bank, the freeboard, has been designed be 500mm above the permanent water level. The reservoir will also have a secondary bund to the north and west of approximately 2m in height. The design also includes 200mm diameter overflow pipes on the eastern side of the reservoir, which will be situated 240mm above the permanent water level.

- 3.2 The proposed development includes a water storage tank and pump house, which will be located in the south east of the corner of the Site. The pump house constitutes a relatively small timber shed. The pump house will have maximum external dimensions of 3m x 4m will be 3m in height and will be constructed of galvanized steel panels.
- 3.3 It is proposed that the reservoir will be enclosed by a dark green chain link fence, approximately 1.5m in height.

#### 4 Comments from third parties

- 4.1 The application was advertised by means of letters of notification to 11 neighbouring properties. To date (19.10.2018) 2 letters of representation has been received in response to this proposal, regarding:
- Fencing
  - Flood Risk
  - Potential Insects

#### 5 Consultations

The following Statutory Consultees were consulted:

**SCC Heritage Conservation Team: Archaeology:** no objection. Recommend planning conditions

**Environment Agency:** no objection. Offered advice with respect to flood risk and groundwater abstraction

**Surrey County Council Highways:** no objection. Recommend planning condition

#### 6 Relevant planning history

Woodcote Park is subject to an extensive planning history. The below table sets out the recent and relevant applications pertaining to the Application Site only:

<b>Application number</b>	<b>Decision date</b>	<b>Application detail</b>	<b>Decision</b>
12/00801/FUL	14/01/2013	Construction of a lined reservoir for golf course irrigation with landscaping and associated works, apparatus and engineering operations	Granted
10/00940/FUL	25.02.2011	Construction of a new 4.0 million gallon irrigation reservoir (lined)	Withdrawn

## 7 Planning Policy

### National Policy Planning Framework (NPPF) 2018

Chapter 2	Achieving sustainable development
Chapter 12	Achieving well-designed places
Chapter 13	Protecting Green Belt land
Chapter 14	Meeting the challenge of climate change, flooding and coastal change
Chapter 15	Conserving and enhancing the natural environment
Chapter 16	Conserving and enhancing the historic environment

### Core Strategy 2007

Policy CS1	Creating Sustainable Communities in the Borough
Policy CS2	Green Belt
Policy CS3	Biodiversity and Nature Conservation Areas
Policy CS5	Conserving and Enhancing the Quality of the Built Environment
Policy CS6	Sustainability in New Developments

### Development Management Policies Document (2015)

Policy DM1	Extent of Green Belt
Policy DM5	Trees and Landscape
DM8	Heritage Assets
Policy DM10	Design Requirements for New Development (Including House Extensions)

## 8 Planning considerations

### Principle of development

- 8.1 This application seeks the construction of a lined reservoir for golf irrigation. The Site falls within the Green Belt, which is awarded protection by both National and Local Planning Policy. This seeks to safeguard the permanence of the Green Belt and ensure that its quality is maintained.

- 8.2 The revised National Planning Policy Framework (NPPF) was published on 24 July 2018 and sets out the government's planning policies for England and how these are expected to be applied. As above, the Government attaches great importance to Green Belts and paragraph 133 of the NPPF sets out that openness and permanence are the essential characteristics of Green Belts.
- 8.3 Paragraph 134 of the NPPF sets out the five purposes that Green Belt serves. These are provided below:
- a) to check the unrestricted sprawl of large built-up areas;
  - b) to prevent neighbouring towns merging into one another;
  - c) to assist in safeguarding the countryside from encroachment;
  - d) to preserve the setting and special character of historic towns; and
  - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 8.4 Paragraph 141 of the NPPF sets out that once Green Belts have been defined, Local Planning Authorities should plan positively to enhance their beneficial use, such as looking for opportunities to (inter alia) provide for outdoor sport and recreation and retain and enhance landscapes.
- 8.5 The construction of new buildings in the Green Belt is regarded as inappropriate development, in line with paragraph 145 of the NPPF. Exceptions to this include (inter alia) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and recreation, as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 8.6 Chapter 15 of the NPPF relates to the conservation and enhancement of the natural environment. Paragraph 170 sets out that valued landscapes should be protected and enhanced.
- 8.7 Policy CS2 (Green Belt) of the Core Strategy (2007) seeks to ensure that the Green Belt continues to serve its key functions and maintain its existing general extent. Strict control will be exercised over inappropriate development, as defined by Government policy.

- 8.8 Policy DM1 (Extent of the Green Belt) of the Development Management Policies Document (2015) sets out that the Green Belt will be maintained along the boundaries of the existing built-up area and extending to the outer Borough boundary as defined in the Epsom and Ewell Borough-wide Local Plan 2000 and as defined in the successor Site Allocations Development Plan Document. Supporting paragraph 2.3 of the Development Management Policies Document (2015) sets out that the main purpose of the Green Belt is to prevent urban sprawl and the coalescence of neighbouring settlements by keeping land permanently open.
- 8.9 This application seeks the construction of a lined reservoir for golf irrigation. Whilst the NPPF does not specifically set out that a reservoir constitutes appropriate development in the Green Belt, its purpose, in this instance, is to serve the adjacent golf courses. It is therefore facilitating outdoor sport and recreation and complies with paragraph 145 of the NPPF.
- 8.10 The Site itself is within an area of cleared plantation and is contained by tree belts, which provide physical containment and visual enclosure to the Site. Due to its location between the golf courses at Woodcote Park and the Ridge, it will prevent sprawl and encroachment, which is a principle objective of National and Policy DM1. A Landscape and Visual Impact Statement accompanies the application (ref: Project/Ref, July 2018) and this recognises that the Site is well-contained, with one partial glimpsed view from Headley Road where there is a short gap in the existing tree belt. Whilst there are filtered near distance views to the site, especially during winter, the report considers that the proposed reservoir would be readily contained within the existing tree belts and plantation woodland and would not result in the loss of any important landscape features. Therefore, the proposal is considered to comply with paragraph 170 of the NPPF.
- 8.11 The application site is currently vacant and unkempt and is not considered to make an important contribution to the character of the Green Belt. The proposed reservoir provides an opportunity to bring the vacant site into use and enhance its immediate landscape through sensitive design, in conformity with paragraph 141 of the NPPF and Local Planning Policy.
- 8.12 In summary, the proposed reservoir is not considered to detrimentally harm the Green Belt. Instead, it will bring into use and enhance a vacant plot of land that is contained within existing tree belts. The proposed reservoir will provide an enhancement of the Site.



Design

- 8.13 Chapter 12 of the NPPF refers to design. Paragraph 127 sets out that planning decisions should ensure that developments (inter alia) function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history, including the surrounding built environment and landscape setting. Development should also create places that are safe, inclusive and accessible.
- 8.14 Paragraph 130 of the NPPF sets out that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.
- 8.15 Paragraph 131 of the NPPF stipulates that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 8.16 Policy CS5 (Conserving and Enhancing the Quality of the Built Environment) of the Core Strategy (2007) sets out that the Council protect and seek to enhance the Borough's heritage assets including historic buildings, conservation areas, archaeological remains, ancient monuments, parks and gardens of historic interest, and other areas of special character. High quality design and inclusive design will be required for all developments. Development should:
- create attractive, functional and safe public and private environments;
  - reinforce local distinctiveness and complement the attractive characteristics of the Borough; and
  - make efficient use of land and have regard to the need to develop land in a comprehensive way.
- 8.17 Policy DM10 (Design Requirements for New Development (Including House Extensions) of the Development Management Policies Document states that development proposals will be required to incorporate principles of good design. Development proposals should (inter alia) be adaptable and sustainability designed, subject to aesthetic considerations and incorporate the principles of safe design to reduce the risk of fear of crime.

- 8.18 A Design and Access statement accompanies the application. This sets out the proposal is for a 6 million gallon reservoir for the irrigation of the two golf courses. The volume of water is to be stored above ground level. As part of the previous scheme, a technical analysis of water requirements was undertaken and based on historical usage records and a review of the golf course management, it was established that a minimum of 6 million gallons surface water reservoir is required to meet the irrigation needs to the two golf courses at Woodcote Park.
- 8.19 The accompanying Design and Access Statement sets out that reservoir will have a maximum depth of 6m at its maximum. The banks will extend to 3.47m in height at its highest, although lower than in other parts given the change in topography across the Site. The height of the bank, the freeboard, has been designed be 500mm above the permanent water level. The reservoir will also have a secondary bund to the north and west of approximately 2m in height. The design also includes 200mm diameter overflow pipes on the eastern side of the reservoir, which will be situated 240mm above the permanent water level.
- 8.20 The proposed development includes a water storage tank and pump house, which will be located in the south east of the corner of the Site. The pump house constitutes a relatively small timber shed. The pump house will have maximum external dimensions of 3m x 4m will be 3m in height and will be constructed of galvanized steel panels.
- 8.21 The reservoir will be enclosed by a dark green chain link fence approximately 1.5m in height.
- 8.22 A landscape concept plan is provided within the Design and Access Statement (see Figure 6.6), which sets out how the reservoir will integrate within its immediate landscape. This is also included within the accompanying Landscape and Visual Impact Statement (July 2018), see drawing L14. The proposal is considered to comply with design requirements of the NPPF, Policy CS5 and Policy DM10.
- 8.23 In summary, the technical detail of the proposed reservoir is illustrated within the accompanying Design and Access Statement and accompanying drawings. The design of the reservoir and the proposed indicative landscape plan is considered to comply with the NPPF, Policy CS5 and Policy DM10.

#### Sustainable Development

- 8.24 The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF sets out that there are three overarching objectives to achieving sustainable development, which includes an environmental objective. Development should contribute to protecting and enhancing the natural, built and historic environment, making effective use of land and helping to improve biodiversity.

- 8.25 Policy CS1 of the Core Strategy (2007) expects development and use of land to contribute positively to the social, economic and environmental improvements necessary to achieve sustainable development. Changes should protect and enhance the natural and built environment and should achieve high quality sustainable environments for future generations.
- 8.26 The proposed reservoir will be located on a vacant and unused piece of land. The proposed reservoir will enable the sustainable irrigation of the adjacent golf courses, reducing reliance on mains water supply. This in turn will help to achieve sustainable development, conforming with National Planning Policy and Policy SC1.
- 8.27 The proposed reservoir has been designed to assimilate within its landscape and will add a new feature to the Site. The new waterbody with aquatic and marginal planting will increase the biodiversity value of the Site, which will enhance the environment and help to achieve sustainable development. This conforms with Policy CS1.
- 8.28 In summary, the proposed reservoir is considered to achieve sustainable development by reducing reliance on mains water supply and increasing the biodiversity value of the Site through the provision of a new waterbody with aquatic and marginal planting.

Impact on Biodiversity and Ecology

- 8.29 Chapter 15 of the NPPF relates to the conservation and enhancement of the natural environment. Paragraph 170 sets out that planning decisions should contribute to and enhance the natural and local environment by (inter alia) protecting and enhancing valued landscapes and sites of biodiversity. Development should, wherever possible, help to improve local environmental conditions, such as air and water quality.
- 8.30 Paragraph 175 of the NPPF sets out that development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 8.31 Policy CS3 (Biodiversity and Nature Conservation Areas) of the Core Strategy (2007) sets out that the biodiversity of Epsom and Ewell will be conserved and enhanced through the support for measures which meet the objectives of National and Local biodiversity action plans in terms of species and habitat. Development that would harm Grade 3 Sites of Nature Conservation Interests (SNCIs) will not be permitted unless suitable measures are put in place and it has been demonstrated that the benefits of a development would outweigh the harm caused.

- 8.32 An Ecological Appraisal accompanied the previous application at the Site (ref: C\_EDP1297\_01g, September 2012) and an Updated Ecology Report accompanies this application (ref: edp1297\_r020b, August 2018). These reports should be read in conjunction with each other. The Updated Ecology Report is informed by a range of ecology survey work undertaken in 2012. Due to the potential of the Site to have changed during the intervening period, an update desk study, Extended Phase 1 Habitat survey, pilot breeding bird survey and reptile survey was completed in April and May 2018, to establish whether any material changes to the ecology baseline have taken place in the interim.
- 8.33 Aside from Roman snails being present within the Application Site, the habitat and species interests within the Site are largely unchanged from the original Ecological Appraisal carried out in 2012. The Site continues to support an assemblage of habitats and species that are considered to be of low ecological value. The Update Ecology Report sets out that the recommendations and conclusions drawn in the 2012 Ecological Appraisal are still considered to remain appropriate. Additional recommendations are also provided with respect to breeding birds and Roman Snails.
- 8.34 For clarity, the original Ecological Appraisal sets out the following recommendations:
- Create new aquatic, wildflower grassland and shrub habitat that offer additional opportunities for protected/notable species of amphibians, reptiles, birds, bats and invertebrates (e.g. Roman Snail);
  - Include within the reservoir design, where feasible, varied water depths and graded margins that are suitable for a variety of emergent wetland plant species and protected/notable species of amphibians and invertebrates;
  - Clearly demarcate and protect the plantation woodland habitat from construction works in line with the (previously submitted and approved) Arboriculture Report;
  - Enhance the adjacent plantation woodland habitat in line with the (previously submitted and approved) Arboriculture Report through appropriate management such as thinning and coppicing in order to enhance opportunities for protected/notable species of birds and dormice;
  - Undertake vegetation clearance outside of the bird breeding season (February to September inclusive) or following inspection by an ecologist if not active nests are identified;
  - Include a high proportion of native fruit/nut bearing and flowering species in new/replacement tree, shrub and herb planting to enhance opportunities for bats, birds and invertebrates;
  - Take a precautionary approach during construction to avoid the accidental killing or injury of reptiles by such measures as phase vegetative clearance, dismantling of potential refugia by hand and briefing of construction workers of reptile interests;

- Take a precautionary approach during construction to avoid the accidental killing or injury of Roman Snails as per the reptile mitigation strategy;
- Enhance opportunities for reptiles through the creation of wildflower grassland and hibernacula (rubble piles); and
- Appoint an Ecological Clerk of Works to the scheme to advise on and oversee, where necessary, the recommendations.

8.35 A Landscape and Visual Impact Statement (July 2018) is submitted with the application. This identifies that the proposed reservoir offers an opportunity for structural diversity across the Site's tree cover and provides potential for a variety of habitats through proposals for a new water body. The proposed species-rich grassland / wildflower meadow habitat will introduce a new habitat to the Site and can be seen on the Landscape Strategy Plan (Drawing No: LI4) within the Landscape and Visual Impact Statement.

8.36 The Site is designated as a Grade 3 SNCI, which is an area designated locally for its wildlife importance. In line with Policy CS3, development that would harm a Grade 3 SNCI will not be permitted unless it can be demonstrated that the benefits of the development would outweigh the harm caused. In this instance, it is understood that the habitats and species within the Site are considered to be of low ecological value. The proposal would provide potential for a variety of new habitats to be introduced into the Site. It is therefore considered that the ecological value of the Site will improve, in conformity with the objective of the NPPF and Policy CS3.

8.37 In summary, the Site supports an assemblage of habitats and species that are considered to be of low ecological value. The proposed reservoir offers an opportunity for structural diversity across the Site's tree cover and provides potential for a variety of new habitats. The proposal is therefore considered to enhance the ecological value of the Site, in conformity with National Planning Policy and Policy CS3.

### Trees

8.38 Chapter 15 of the NPPF concerns the conservation and enhancement of the natural environment. Paragraph 170 sets out that planning decisions should contribute to and enhance the local environment by (inter alia) recognising the intrinsic character and beauty of the countryside and the wider benefits from ecosystem services, including trees and woodland.

8.39 Paragraph 175 of the NPPF sets out that development resulting in the loss or deterioration or irreplaceable habitats such as ancient woodland and ancient or veteran trees should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

- 8.40 Policy DM5 (Trees and Landscape) of the Development Management Policies Document (2015) sets out that the Borough's trees, hedgerows and other landscape features will be protected and enhanced by (inter alia):
- Planting and encouraging others to plant trees and shrubs to create woodland, thickets and hedgerows; and
  - Requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include the planting of new semi-mature tree and other planting.
- 8.41 Where trees, hedgerows or other landscape features are removed, appropriate replacement planting will normally be required. Consideration should be given to the use of native species as well as the adaptability to the likely effects of climate change.
- 8.42 An Arboricultural Implications Report accompanies the application (ref: SJA air 18095-01c, July 2018). This sets out that 33 individual trees and four groups of trees growing within or immediately adjacent to the site were surveyed. The trees are located primarily on the boundaries of the Site.
- 8.43 The permitted scheme in 2012 did not require the removal of any trees. The current scheme proposes a reservoir with a 6 million capacity, which requires a larger footprint and which will result in tree losses. All of the trees and groups of trees that constitute the main Arboricultural features of the Site and which make the greatest contribution to the character and appearance of the local landscape, to amenity or to biodiversity, will be retained.
- 8.44 To accommodate the proposed development, six individual trees (nos. 13, 14 and 22-25) are proposed to be removed, either because they are situated within the footprints of proposed structures or surfaces, or because they are too close to these to enable them to be retained. Of the trees to be removed:
- None are category 'A'
  - None are category 'B'
  - Six are category 'C'
  - Two groups of trees (G2 and G4) are to be partially removed.
- 8.45 None of the individual trees or groups of trees to be removed are covered by a TPO. The six category 'C' trees that are to be removed are of low quality, low value, or short-term potential. For these reasons, their removal will have no significant impact on the character and appearance of the area.

- 8.46 Of the four groups, one category 'A' group and one category 'B' group are to be partially felled. Ten individual specimens on the northern edge of the category 'A' group (G4) at the southern end of the site will be removed, but as these grow internally to the Site, their removal is considered to make no alteration to the Arboricultural character and appearance of the surrounding landscape.
- 8.47 The category 'B' group (G2) on the northern boundary of the site is proposed to be narrowed, by removing a strip of trees within it along its south edge. This will reduce the total area of canopy cover it provides by approximately 60%, but this will not require the removal of any large of mature trees, or any trees that are prominent or significant features of the local landscape.
- 8.48 The Design and Access Statement that accompanies the proposal sets out a Landscape Concept Plan. This proposes indicative zones for reinforcement woodland and understorey planting. It sets out that reinforcement woodland and understorey planting would be beneficial along the western boundary to Headley Road. Additionally, there is potential for tree and shrub planting to the north-east and south-east of the reservoir to integrate the proposed pump house and storage tank into the landscape structure.
- 8.49 In summary, no category 'A' or 'B' trees are to be removed and none of the main arboricultural features of the site are to be removed. The proposed removal of individual trees and partial removal of groups of trees will represent no noticeable alteration to the main arboricultural features of the Site, nor will it have an adverse impact on the arboricultural character and appearance of the local landscape. The proposal provides indicative zones for reinforcement woodland and understorey planting and subject to landscaping being conditioned, the proposal is considered to comply with National Planning Policy and Policy DM5.

#### Flood Risk

- 8.50 Chapter 14 of the NPPF relates to meeting the challenge of climate change, flooding and coastal change. Paragraph 155 stipulates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Paragraph 163 sets out that when determining any planning applications, Local Planning Authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.

- 8.51 Policy CS6 (Sustainability in New Developments) of the Core Strategy (2007) sets out that proposals for development should result in a sustainable environment and reduce, or have a neutral impact upon, pollution and climate change. The Council will expect proposals to demonstrate how sustainable construction and design can be incorporated to improve the energy efficiency of development – both new build and conversion. In order to conserve natural resources, minimise waste and encourage recycling, the Council will ensure that new development (inter alia):
- has no adverse effects on water quality, and helps reduce potential water consumption for example by the use of water conservation and recycling measures and by minimising off-site water discharge by using methods such as sustainable urban drainage; and
  - avoids increasing the risk of, or from, flooding.
- 8.52 A Flood Risk Assessment has been submitted with the application (ref: 7004190/MZ/EI, June 2018). This sets out that the site is located within Flood Zone 1 (low probability of flooding) and that no other significant sources of flooding have been identified as affecting the area in which the reservoir is proposed. The Flood Risk Assessment sets out that it has been demonstrated that even in an extreme rainfall scenario there is sufficient storage capacity within the reservoir to manage the additional rainfall volume. In addition overflow pipes will be positioned on the eastern side of the reservoir to direct any exceedance flow towards the undeveloped valley where the golf course is located.
- 8.53 The Environment Agency (EA) formally responded to the application on 05 September 2018. The EA has no objection to the planning application submitted. The letter does however set out advice with respect to flood risk and groundwater abstraction. Specifically, the letter sets out that the volume retained is below the 25,000m<sup>3</sup> threshold for a large raised reservoir and a breach is unlikely on non-impounding reservoirs if correctly designed and constructed, as filling would be controlled. If there are any signs of problems, the reservoir inflow can be stopped.
- 8.54 The EA letter also sets out that as the reservoir is below the qualifying volume it will not be subject to a routine inspection regime. However, there remains a duty of care on any landowner to maintain their assets and operate them in a safe condition.
- 8.55 The proposed reservoir is within Flood Zone 1 (low risk of flooding). As such, the proposal is not within an area at risk of flooding, in conformity with paragraph 163 of the NPPF. The accompanying Flood Risk Assessment sets out even in an extreme rainfall scenario, there is sufficient storage capacity within the reservoir to manage the rainfall volume and therefore it complies with Policy CS6.



- 8.56 In summary, the proposed reservoir will irrigate the adjacent golf courses, reducing reliance on mains water supply. It has been designed to ensure that even in an extreme rainfall scenario, the reservoir will have sufficient storage capacity to manage the additional rainfall volume and as such, complies with Policy CS6.

Archaeology

- 8.57 Chapter 16 of the NPPF refers to the conservation and enhancement of the historic environment. Paragraph 189 states that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 8.58 Policy CS5 (Conserving and Enhancing the Quality of the Built Environment) of the Core Strategy (2007) sets out that the Council will protect and seek to enhance the Borough's heritage assets including (inter alia) archaeological remains. The settings of these assets will be protected and enhanced.
- 8.59 Policy DM8 (Heritage Assets) of the Development and Management Policies seeks to resist the loss of Heritage Assets and instead promote the opportunity to conserve and enhance these. Specifically, on any major development site of 0.4ha or greater, applicants are required to undertake prior assessment of the possible archaeological significance of a site and the implications of the proposals.
- 8.60 The application exceeds the 0.4ha threshold at which archaeological assessment is required under Local Plan policy DM8. As such, an Archaeological Impact Assessment (ref: edp1297\_r005c, June 2018) accompanies the application. This indicates that there no archaeological remains were identified within the Site, although some archaeological potential has been identified.
- 8.61 The Surrey County Council Archaeological Consultation response recommends a programme of archaeological monitoring of the groundworks associated with the proposed development as an acceptable and proportionate response to ensure that any heritage assets of archaeological significance that may be present are adequately identified and recorded. Given that any archaeological Heritage Assets that may be present are unlikely to be of national significance requiring preservation in situ, securing the archaeological monitoring as a condition of any planning permission is appropriate. The methodologies to be adopted during the archaeological monitoring will need to be specified in a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority before the development can commence.

8.62 In summary, an Archaeological Impact Assessment accompanies the application, which concludes that based on available evidence, there is a low to moderate potential for the proposed development to encounter archaeological remains. Subject to a condition, the Surrey County Council Archaeological Consultation posed no objection to the proposal at this location.

8.63 Community Infrastructure Levy (CIL)

8.64 The proposal is not CIL liable.

## 9 Conclusion

9.1 This application seeks the construction of a lined reservoir for golf course irrigation at Woodcote Park, Epsom. The purpose of the reservoir is to reduce reliance on mains water supply.

9.2 The principle of development has already been established. Planning permission was granted on 14 January 2013 for a reservoir in the same location, under reference 12/00801/FUL. The planning permission was not implemented and expired on 14 January 2016. The original scheme sought planning permission for a 4.49 million gallon reservoir, whereas this application seeks permission for a 6 million gallon reservoir, by excavating deeper.

9.3 The proposed reservoir would be well integrated within the landscape setting and is not considered to constitute inappropriate development within the Green Belt. The proposed reservoir would enhance what is currently damaged and derelict land and provide ecological and biodiversity benefits. It is considered to comply with National and Local Planning Policy requirements.

## 10 Recommendation

10.1 Grant planning permission, subject to the following conditions:

### Conditions:

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

**Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.**

(2) **The development hereby permitted shall be carried out in strict accordance with the approved drawings:**

**Site Location Plan: RAC\_SLP\_09\_05.18**

**Site Sections: RAC\_SS\_08\_06.18**

**Irrigation Reservoir 6million gallons: RAC\_IRP\_10\_06.18 rev D**

**Reason: For the avoidance of doubt and to ensure that the development is carried out in accordance with the approved plans to comply with Policy CS5 of the Core Strategy (2007).**

- (3) Prior to the commencement of development (other than ground works and access construction), details, including siting, floor plans, elevations and external materials of the associated pump house shall be submitted to and approved in writing by the Borough Council. The development shall be carried out in accordance within the approved details.**

**Reason: To secure a satisfactory appearance in the interests of the visual amenities and character of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM9 and DM10 of the Development Management Policies 2015.**

- (4) No fence(s) shall be installed until the details of the design, external appearance and decorative finish of all fences and any other means of enclosure shall be submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details prior to the development first being brought into use and shall thereafter be retained.**

**Reason: To secure a satisfactory appearance in the interests of the visual amenities and character of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM9 and DM10 of the Development Management Policies 2015.**

- (5) The reservoir land forming and development, shall be carried out in strict accordance with the agreed recommendations for Tree Work and Tree Protection as detailed in the Arboricultural Assessment produced by SJA dated July 2018 reference SJA air 18095-01C**

**Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM5 and DM9 of the Development Management Policies 2015.**

- (6) No development shall take place until an Arboricultural Method Statement and a Tree Protection Plan in accordance with British Standard 5837:2012 (or later revision) has been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the agreed details and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until fencing has been erected in accordance with the Tree Protection Plan. Within any area fenced in accordance with this condition, nothing shall be stored, placed or disposed of above or below ground, the ground level shall not be altered, no excavations shall be made, nor shall any fires be lit, without the prior written consent of the local planning authority. The**

**fencing shall be maintained in accordance with the approved details, until all equipment, machinery and surplus materials have been moved from the site.**

**Reason: To ensure that the tree(s) receive the appropriate treatment and that the tree work is of a satisfactory standard to protect amenity in accordance with Policies CS1 and CS5 of the Core Strategy (2007) and Policies DM5 and DM9 of the Development Management Policies 2015.**

- (7) No development shall commence until a Construction Transport Management Plan, to include details of:**
- (a) parking for vehicles of site personnel, operatives and visitors**
  - (b) loading and unloading of plant and materials**
  - (c) storage of plant and materials**
  - (d) HGV deliveries and hours of operation**
  - (e) vehicle routing**
  - (f) measures to prevent the deposit of materials on the highway**
  - (g) on-site turning for construction vehicles has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.**

**Reason: To ensure that the development does not prejudice the free flow of traffic and conditions of safety on the highway or cause inconvenience to other highway users in accordance with Policy CS16 of the Core Strategy (2007) and Policy DM35 of the Development Management Policies 2015.**

- (8) No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority. The development shall only take place in accordance with the detailed scheme pursuant to this condition. The archaeological works only shall be carried out by a suitably qualified investigating body acceptable to the Local Planning Authority.**

**Reason: The site has archaeological potential and it is important that the archaeological information should be preserved as a record before it is destroyed by the development in accordance with Policy CS5 of the Core Strategy (2007).**

- (9) The development shall be implemented strictly in accordance with the mitigation and enhancement measures outlined in the Ecological Appraisal dated August 2018 (Report Reference - EDP1297\_r020b) and the recommendations and conclusions drawn in the 2012**

**Ecological Appraisal (Report Reference - EDP1297\_01g) dated September 2012.**

**Reason: To preserve and enhance biodiversity and habitats in accordance with Policy CS3 of the Core Strategy (2007) and Policy DM4 of the Development Management Policies 2015.**

- (10) The development permitted by this planning permission shall only be carried out in accordance with the approved FRA produced by WSP dated June 2018 reference no. 7004190/MZ/EI.**

**Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM5 and DM9 of the Development Management Policies 2015.**

- (11) No construction work shall be carried out in such a manner as to be audible at the site boundary before 07:30 hours or after 18:30 hours Monday to Friday; no construction work shall be audible at the site boundary before 08:00 or after 13:00 hours on Saturdays and no construction work of any nature shall be carried out on Sundays or Bank/Public Holidays.**

**Reason: In order to safeguard the amenities of the occupiers of neighbouring properties in accordance with Policy DM10 of the Development Management Policies 2015.**

- (12) Details of both hard and soft landscape proposals, including a schedule of landscape maintenance for a minimum period of 5 years, shall be submitted to and approved in writing by the local planning authority. The approved landscape scheme (with the exception of planting, seeding and turfing) shall be implemented prior to the occupation of the development hereby approved and thereafter retained.**

**Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality in accordance with Policy CS5 of the Core Strategy (2007) and Policies DM5 and DM9 of the Development Management Policies 2015.**

**Informative:**

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