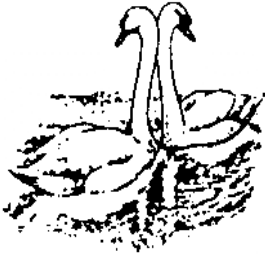


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The Case Officer,
Development Management Section,
Planning,
Reigate and Banstead Council,
Town Hall,
Castlefield Rd.,
Reigate RH20SH

23rd October 2019

Dear Sir,

**19/01513 Walton Heath Golf Course, Dorking Rd., Walton
Proposed new clubhouse with associated access, parking and artisan building.**

1. INTRODUCTION

The Residents Association objects strongly to this application, for several reasons.

Our primary objection is that the proposal is inappropriate development in the Green Belt, because of impact on “openness” and the “purposes” of the Green Belt. We also consider that there is “other harm” in terms of impact on the AGLV, ecology, sustainability and heritage. It is therefore necessary for the Club to show that there are “very special circumstances” which outweigh this harm and in our opinion it has failed to do this. There are clearly other options which can overcome the deficiencies of the existing clubhouse and the crossing of the Dorking Road.

There are also other concerns relating more specifically to the site layout including the parking and the impact on the practice ground.

2. BACKGROUND

In 2014/2015, the Residents Association objected unsuccessfully at a public inquiry, and subsequent appeal at the High Court, into the deregistration of part of Beechams Field and provision of replacement land over a mile away on the opposite side of the M25. The Club stated at that time that the land was required for a more formal practice area for members only, and there was no intention to relocate the clubhouse, (even though the wooded area beyond the open Beechams Field, and now the subject of the planning application, was included in the deregistered area.)

It was felt by many members of the community that this was a precursor to moving the clubhouse onto the heath but these fears were not something the Inspector taking the evidence at the deregistration inquiry could take into account.

In 2016/2017, the Club’s Board progressed what was termed ‘contingency planning’ which included a proposal to move the clubhouse.

3. IMPACT ON THE GREEN BELT

Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in **very special circumstances**. (our emphasis here and elsewhere in this section)

Paragraph 144 states that local planning authorities should ensure that **substantial weight** is given to any harm to the Green Belt 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.

Paragraph 145 b) is quite clear that the provision of new buildings for inter alia outdoor sport and recreation is appropriate development **providing** that the facilities **preserve the openness of the Green Belt** and **do not conflict with the purposes** of including land within it.

In our view, the proposal is inappropriate development because the proposal does not preserve openness or meet all the purposes set out in paragraph 134. It also not conform with policy OSR 3.3 and 4 of the DMP. OSR3 4. States that the development should not have an adverse effect on the features of nature conservation, geology and biodiversity or landscape value character of the site.

Openness (i.e. keeping the land permanently open)

The Planning Policy Guidance dated 22nd July 2019 (which the applicants do not refer to) gives guidance on what constitutes openness and covers visual, spatial, duration and activity impacts.

a). Visual Impact

It is clear that the new access onto the Dorking Road, the new road and parking along the road, will be visible from the Dorking Rd and also the public footpath at the end of the practice area. As the building will extend beyond the wooded area onto Beechams Field it will be a very dominant feature in the landscape until the new planting matures.

The clubhouse will also be very visible across the golf course. Clearly if the Club wishes members to have a good view of the golf course from the new clubhouse, it works the other way and the building will be very obtrusive in the landscape from over a wide arc. It has to be remembered that the public have rights to walk all over the common and are not restricted to the rights of way. It will be a substantial building, about 55m long and about 8m high. Although mainly single storey, there is a high headroom at ground floor level. We appreciate that attempts have been made to reduce the width of the building, but it will, nevertheless, be a significant structure which will clearly affect the open views. At the time of the British Masters, there was a pavilion on the approximate site of the new clubhouse which was prominent in the landscape. In the case of the clubhouse on the Beaverbrook site (referred to by the applicant), a height mock-up was arranged for Members so they could see the scale of the building. We suggest this is done here so its impact can be easily comprehended.

b). Spatial impact

Taking into account the new access road and car parking area as well as the buildings, the footprint of the development is considerable. It will be very damaging to the openness of the area. The southern side of the Dorking Road between the A217 and the M25 and beyond is currently open, with very little development. Most of it is common land, apart from Beechams Field, the maintenance building and a couple of small historic groups of housing. There has been little new development since the designation of the Green Belt apart from the Club's maintenance building. Spatially, the development will have a significant adverse impact on this part of the Green Belt.

c). Duration

The PPG refers to duration of a development and its remediability as one of the factors affecting openness. In this case, the proposal is for a permanent structure with no proposals to return the land to its original state.

d). Degree of activity

One of our concerns is the increase in activity which will be generated. The PPG refers to traffic generation and clearly there will be a significant increase in activity, particularly from the increased traffic generation by club members using the 171 car parking spaces which, based on the existing car park usage, will sometimes be at capacity.

Precedents quoted by the applicant

We have looked at the cases referred to by the applicant but the Club fails to show how the development does not harm openness.

In the case of Beaverbrook/ Cherkley Court, the case was made for need for a new high class golf course which therefore required a clubhouse. The situation differs from the current application because here there is an existing clubhouse. Reference is made to 21 parking spaces being acceptable in terms of openness in the Rotherham fishing pond case, but here 171 spaces are proposed in an open area without a clutter of other buildings. The Lee Valley case is different because as set out in paragraph 145 a), agricultural buildings are by definition appropriate in the Green Belt. The Turner case emphasises our point that openness should take into account factors such as how built up the area is. In the Turner case there was a mobile home and storage area, here the site is open.

With reference to the other developments referred to in Reigate and Banstead, the Reigate and Redhill Rugby club development amounted to modest additions to an existing structure and the Old Reigation Rugby Club development was a replacement on site – not relocating from a non-Green Belt location.

There are a couple of other recent cases which are relevant.

One relates to a golf course in Hertfordshire (reported in Planning on 11th December 2018 with Inspector Rory Macloud). Here high safety netting around the 14th green was refused for its harm to openness and inappropriateness even though close to housing and on the edge of the course. In another case (reported in Planning 7th December 2018 with Inspector Paul Freer) the Inspector decided that components of an Essex fitness business including outdoor facilities and a gym amounted to inappropriate development in the Green Belt. Although he attached significant weight to the health and social benefits, he decided the components both individually and cumulatively harmed the openness of the Green Belt in this area, as did the parking area, toilets and various ancillary structures and that the benefits did not amount to the very special circumstances necessary to justify the development.

The purposes of the Green Belt

There are 5 purposes listed in paragraph 134 of the NPPF. We consider that a) and c) are relevant.

a). To check the unrestricted sprawl of large built-up areas.

Although Walton on the Hill is not in itself a large built-up area, it forms the southern part of a sizeable suburban area which includes Tadworth, Kingswood, Nork, Tattenham Corner and Banstead. The Dorking Road is a physical boundary between open countryside to the South, designated as AGLV and AONB, and the built-up area to the North. The clubhouse site and the associated access road and car park are outside the Walton on the Hill envelope and would add to urban sprawl because of the nature of the development.

c). To assist in safeguarding the countryside from encroachment.

The development clearly forms a tongue of development into the open countryside and so fails to safeguard it.

4.”ANY OTHER HARM”

a). Impact on the Landscape

The proposal will have an adverse impact on the landscape which is designated as an Area of Great Landscape Value. Policy CS3.2 of the Core Strategy states that ‘The AONB is a landscape of national importance and therefore will be provided with the highest level of protection’. The same principles will be applied to protect the AGLV as an important buffer to the AONB and to protect views from and into the AONB until such time as there will be a review of the AONB boundary.

The proposal also conflicts with policies NHE1.a and c., NHE2 and 4a and b of the DMP which state that proposals must conserve and enhance the landscape and scenic beauty of the area, with particular regard to public views, tranquillity and light pollution.

Recently the Government has commissioned the Glover Report which emphasises the importance of conserving the beauty of our countryside and proposes measures to increase the finance available to the AONBs and raise their profiles.

The proposed buildings with associated car parking and access road will harm the natural beauty of the area. The development will be visually obtrusive as well as reducing the tranquillity of the area and destroying some local habitats. It certainly will not assist in the conservation and enhancement of the landscape as required in the Council’s adopted plans.

The Surrey Hills AONB planner is quoted at length by the applicants giving the impression he supports the development. We have not seen his letter, but it would appear that he is saying that everything has been done that can be reasonably expected to ensure the development does not affect the openness of the area East of the Dorking Road. He does not actually say that there will be no harm, just that as much as possible has been done to avoid harm. Similarly, he says that the development would not spoil the setting of the AONB because of the distances involved. He does not say that the AGLV would not be harmed and it is the AGLV which would be affected as the AONB is not visible from the site.

There will clearly be a significant impact on the landscape and harm to a considerable area of the AGLV. The new buildings, road and parking will be obtrusive and harmful to its surroundings. The natural beauty of the open areas and woodland will be compromised. The buildings as well as the large area of hard landscaping and increased level of activity will damage the character of the area. At present the area is very tranquil, with only occasional walkers and golfers.

As set out in the section dealing with visual impact on the openness of the Green Belt, the club house will be visible from over nearly 180 degrees to the south and the car parking and access road, together with the rear of the clubhouse building, will be visible across Beechams Field, the Dorking Road and public rights of way.

The impact on the AGLV amounts to “any other harm”.

b). Impact on the natural environment

Paragraph 175a) of the NPPF states that if significant harm to biodiversity cannot be avoided through locating to an alternative site or mitigation measures it should be refused. Since then the Government has updated the Planning Policy Guidance with emphasis on achieving a net gain to biodiversity. The site is in an area designated as of a site of nature conservation importance (SNCI) and policy CS2e) states that these areas “will be protected for their biodiversity value and where appropriate enhanced”. Policies NHE2 3a and NHE3.2 of the DMP are also relevant, referring to the importance of protecting SNCIs trees where the benefits do not outweigh the harm

However, despite the applicant's case that there will be net gain, we consider that the development will be harmful to the natural environment. As the ecology consultant points out (paragraph 5.3 and elsewhere) there has been some relatively recent tree clearance in this area (this is also apparent from google earth maps). This needs to be taken into account when assessing the current situation.

We appreciate that efforts have been taken to avoid the remaining trees but there will still be significant losses. As the ecologist points out, the woodland, mature trees, scrub and the establishment of heath land habitats contribute to the biodiversity and the overall value of the SNCI.

The ecology consultant also points out that there will be harm in the short and medium term but in the long term there will be a net gain. However, much of the proposed enhancement could be done now at little cost and without the new clubhouse. Introducing a heath land environment on the north side of the Dorking Road, although to be welcomed, may not be appropriate for the change to community use. We note that the woodland which was to compensate for the land taken for the reservoir and the wildflower flower meadow for the common land exchange have yet to develop, with areas of woodland still fenced off even though common land is meant to be open.

In general terms there will be a loss of biodiversity in the area adjacent to the proposed development because of the increased traffic and activity resulting in more noise, air pollution and light pollution. This is bound to discourage wildlife whilst the mitigating measures will have little effect in the medium term.

c). Heritage

Although the existing clubhouse is not part of the new clubhouse application, it is of considerable local if not national importance because of the early history of the golf club and should be considered for local listing.

As far as the current application is concerned, it has to be remembered that the common has been open land for hundreds of years, only becoming a golf course early in the twentieth century. It is an important part of the heritage of the area. The Inspector considering the exchange application placed importance on the club's need for a practice ground, and agreed to the Club's proposals. As only a small shed was proposed in terms of buildings, there was relatively little impact on the openness and character of the common land. This current proposal will damage a large area of the Walton Heath although technically being outside it.

Policy CS4 states that development should be designed to respect, conserve and enhance the historic environment and this is amplified in NHE9 1. And 5. The application does none of these. The heritage of the common, which has been protected for many generations, is important and should be protected. A new club house will damage the historic landscape.

d) Sustainability

This is not a major issue, but it should be noted that at present there is accommodation for 10 or 11 staff in the existing club house, yet the proposed new building will only accommodate 2 staff. Not only is there the issue of security with the more remote location but the staff previously accommodated in the club house will presumably be homeless or, if they are living locally, have to travel to the newsite which is in a less sustainable location.

5."VERY SPECIAL CIRCUMSTANCES" ?

We have set out above why we consider that the development comprises inappropriate development and that therefore a case has to be made for 'very special circumstances' which outweigh the harm to the Green Belt and 'any other harm'.

The Club has two main reasons for their proposal. One is the inappropriateness, for a number of reasons, of the existing premises and the second is the difficulty of crossing the Dorking Road. In the following section we examine the reasons the Club puts forward to justify the inappropriate development.

a). Deficiencies with the current clubhouse

The Club argues that the existing building is not fit for purpose because of the cost of maintenance, and the inflexibility and poor layout of the accommodation. A couple of options are illustrated of moving the club elsewhere on the site, neither of which, we agree, is satisfactory.

However, nothing is available on the possibility of refurbishment, providing temporary accommodation or phasing works if necessary. We are aware that an eminent architect has examined the layout of the building and costed improvement works at about £600,000, which even if a very conservative estimate, is a fraction of the relocation costs. (We are aware that this option would not lead to a capital receipt from developing the site for housing). The existing building also has the advantage of providing flexibility for expansion – something which will be difficult on the new location.

At a recent public meeting when the Club explained its proposals, a question was asked about what was Plan ‘B’ if either planning permission was refused or the club members decided against the move on cost grounds. We were informed that there was no plan ‘B’.

This is an unsatisfactory response. There are other options available and in our opinion the poor layout and condition of the existing clubhouse cannot be taken as amounting to the ‘very special circumstances’ required to overcome the harm to the Green Belt. Policy INF2 of the DMP, on community facilities, is relevant, stating in a) that new community facilities will be encouraged where there is an identified local need which cannot be met from the use of the existing stock of community facilities. (There is also the issue that this is a private not community facility).

b) Viability

We appreciate that at the present time golf is in a declining market and many golf clubs are closing, selling parts of their sites off for development, or introducing additional facilities such as spas or income producing function rooms etc.

However, there can be no guarantee that the new facilities will lead to an increase in membership. We are aware that some members will leave if they have to pay an additional premium. Other members are against the move because they value the charm and history of the existing clubhouse.

There is also an element of risk because, from the information available, there will be a financial shortfall after selling off the clubhouse site, using reserves and the additional premium from members. The Club may currently be experiencing an annual deficit but this could increase. We appreciate that the viability of the proposal is not a matter for the Residents Association but it has a bearing because of our concerns for the Club’s future and in particular the long term future of the proposed new development in the Green Belt.

In our opinion, very little planning weight can be attached to the argument that the sustainability of the Club depends on the new clubhouse, and therefore this cannot constitute ‘very special circumstances’.

c) Remoteness of the clubhouse

Considerable weight is attached by the Club to the problem of remoteness of the clubhouse from the two golf courses. We note that some members do not feel that this is a disadvantage and the Residents Association considers that this should be seen only as a minor benefit. In any event the new clubhouse will have only very oblique views of the potential first tee and 18th green which will also be obscured by

trees. Certainly it does not amount to the 'very special circumstances' required to overcome the harm to the Green Belt.

d) National and International ranking

The Club argues that a relocated clubhouse is necessary to attract major championships and retain its rankings. However, a successful British Masters tournament was held recently despite the location of the clubhouse. Walton Heath is one of the few club's to have attracted a championship of this importance. In any event some members have reservations about introducing more tournaments as these curtail the amount of time available for playing.

This argument in favour of moving the clubhouse must carry little weight.

e) A new Artisans Clubhouse

The existing Artisans' clubhouse could be refurbished and is in a far more sustainable location.

f) Traffic

It is recognised that it is frequently difficult to cross the Dorking Road and it is often necessary to wait a short period. This applies not just to the golfers but the many dog walkers, ramblers and joggers who access the two commons, Walton Heath and Banstead Heath from the North. Yet, as the data supplied by the traffic consultants show, there have been no accidents or fatalities involving pedestrians. Surrey County Council, as highway authority, has stated that accident levels are too low to justify a controlled crossing.

Many other golf clubs have to cross busy roads – Cuddington, Epsom, Tyrells Wood and Banstead Downs Golf Clubs (the latter crossing the busy A217) are local examples.

There are other options for a safer crossing. In the past the Golf Club offered to finance a pedestrian crossing. We have approached Surrey County Council to do a feasibility study but were informed there was no finance available. Similarly there is an option for a VAS flashing light but again there are County funding constraints.

Possibly a better option would be for a tunnel, as is now proposed for Liphook Golf Club in Hampshire. If well designed this could be an attractive possibility at a fraction of the cost of the new clubhouse proposal. Although there are currently 3 crossing places, one should suffice if well located, involving comparatively little additional walking.

To conclude, although accident levels are too low for the local highway authority to take action, there are options for the Club to investigate involving either surface or tunnel arrangements to improve safety. This has not been done. In our opinion, the highway crossing issue cannot be used as an argument to justify 'very special circumstances'.

g) Provision of community benefits

The Club puts forward a number of benefits for the community in mitigation against the harm.

The first hole is offered to the community because it will be redundant to the club if the clubhouse is relocated and the layout of the golf courses is reconfigured, However, it is on the edge of the village and will probably be of limited use to the community although the introduction of new heath land is welcomed.

There is a possible offer of an additional car park but the existing one is poorly maintained and parts are unusable after rain. The new location would also be inconvenient for local residents.

Although we have been unable to find any details, there is an offer of better provision for walkers, riders and cyclists. However, walkers and riders already have right of access over the common and generally the land and footpaths are badly maintained beyond the golf courses, particularly on the South side of

the motorway and this includes the exchange lands arising from the deregistration for a reservoir and Beechams Field. More could be done at the present time at relatively little cost.

At the public inquiry into the Beechams Field common land deregistration, because part of the maintenance track, which was well used by riders and walkers, was to be lost to public access, it was agreed that a replacement access be provided along the edge of the golf course - in front of the proposed clubhouse. The site was walked by the Inspector and those accompanying him on his official site visit, including ourselves. However, this important route is not shown on any of the plans. We request that this access is shown on the plans unless a satisfactory alternative is proposed, publicised and agreed as acceptable. We note that the Surrey County Council Countryside Officer also queries the loss of this access.

Although reference is made of local employment, there is no indication that there will be an increase as a result of the development.

Conclusion

In our opinion, the case, made by the Club for the benefits arising from relocation, are insubstantial and together do not outweigh the overall harm.

6. CONCERNS ON THE NEW LAYOUT

a). The Practice area

The only justification at the public inquiry for the deregistration of most of Beechams Field was the need for a better practice area. When the Residents Association objected to the size of the deregistered land, as it included a substantial area of woodland on which the proposed clubhouse is now proposed, we were informed this was necessary for safety reasons.

At the public inquiry, a consultant Jonathan Allbutt for 'Britksafety stated (paragraph 5.3 of his evidence) ' the linear copse to the left hand side of the proposed practice facility provides some protection for users such as dog walkers. However, it is possible that golf balls could be hit on to or over the service road which runs to the left of the proposed practice area.. Should such a shot be pulled (hit to the left by a right handed player) the ball could travel through the woodland'.

The scheme proposals 11.0 shows that the revised practice area is considerably reduced in width with the clubhouse not only occupying the woodland but extending into the open area of Beechams Field. Based on Mr. Allbutt's evidence this could be dangerous as it will be many years before the new planting matures to form a sufficiently dense barrier. The practice tees are moved closer to the Dorking Road which could also be dangerous.

We note also that the new access road and parking reduces the length of the practice area and objections to the application from golfers indicates this could also be dangerous, particularly as driving distances are increasing and there is a public footpath close to the boundary.

It would seem that the practice area, which was the very reason for the deregistration of most of Becham's Field, could be compromised by the new clubhouse.

b). Car parking

We note that the car park has 171 spaces, the same size as the current car park, (as suggested by the Council in order to reduce the amount of hard standing). However, the current car park is currently frequently at capacity and use is made of overflow parking spaces, whereas the new site is heavily constrained. We are concerned that if the Club is successful in attracting new members and visiting golf societies, there will be pressures to extend the car park.

c).The Clubhouse

We are concerned that there could be future pressures to expand the clubhouse as requirements change over time. (We note, for example, the loss of staff accommodation being provided compared with that in the existing premises.) The proposed site provides little flexibility compared with that of the present site. There is a danger that granting planning permission here could create a precedent, to the detriment of the Green Belt and AGLV.

Conclusion

There are doubts on how the new site will operate effectively bearing in mind the constraints on the practice area, the level of car parking provision and inflexibility of the clubhouse design.

7. OVERALL CONCLUSIONS

We have set out why the Residents Association objects to the application in terms of harm to the Green Belt, on grounds of openness and purpose, and “any other harm” (cf The Redhill Aerodrome inquiry) based on the impact on the landscape, heritage, ecology and sustainability. The proposal conflicts with many of the NPPF, Core Strategy and DMP policies.

. In the opinion of the Residents Association, the benefits listed by the applicants do not, either individually or cumulatively, amount to the very special circumstances needed to outweigh the harm. A further concern is that although each application has to be determined on its merits, it could create a precedent for future expansion.

We therefore request that the application is refused.

If the application should be approved, we request a section 106 agreement or conditions be imposed to require the Club to fully implement and maintain the community benefits, to be monitored by the Council, plus a requirement that should the Club fail all buildings and hard surfaces be removed and the land be restored to its existing condition.

Yours sincerely,

Clive Elcome
Chairman

Gillian Hein
Vice Chairman