

APPLICATION NO: 16/00383/FUL		OFFICER: Miss Michelle Payne	
DATE REGISTERED: 8th March 2016		DATE OF EXPIRY : 7th June 2016	
WARD: Charlton Park		PARISH:	
APPLICANT:	Lilleybrook Golf Club		
LOCATION:	Lilleybrook Golf Club, 313 Cirencester Road, Charlton Kings		
PROPOSAL:	Engineering works to re-profile and re-contour the existing practice facility to create a mini 9-hole golf course by importing 100,000 cubic metres of inert fill material		

REPRESENTATIONS

Number of contributors	29
Number of objections	26
Number of representations	2
Number of supporting	1

42 Bafford Lane
Cheltenham
Gloucestershire
GL53 8DP

Comments: 4th April 2016

I OBJECT to this planning proposal on grounds of (a) long-term adverse impact on the Lilley Brook water course, including as it crosses my garden, and (B) adverse impact on traffic on the Cirencester Road during construction.

The Flood Risk Assessment attached to the planning documents shows (Figure 3.1) that the current contours of the development site naturally direct any surface water towards the Southfield Brook, and personal observation shows that excess surface water also leaves the site under the hedge into a drain running alongside Sandy Lane, and thence into the Southfield Brook. Figure 3.1 also shows a drain within the golf course but to the east of the development area; this drain heads generally north-east towards the Charlton Kings industrial estate and presumably eventually joins the upper Lilley Brook. The contours shown on Figure 3.1 make it very unlikely that water from the development area is at present able to reach this drain.

Appendix B to the Flood Risk Assessment (The Conceptual SuDS Layout) shows the outfall from the SuDS to be directed away from Sandy Lane and the Southfield Brook in a north-easterly direction, towards the drain flowing into the Lilley Brook. If this indeed what is intended, the result will be damage both by reducing the flow in the Southfield Brook and by increasing it in the upper Lilley Brook between the golf club and the point where the Lilley Brook and Southfield Brook meet. The upper Lilley Brook is constricted at several points by culverts, for example under Bafford Approach and Bafford Lane, which already cause the stream to back up at times of heavy flow, and extra run-off from the golf course will make this worse. For me, the consequence will be to aggravate the loss of amenity in terms of my ability to enjoy the lower part of my garden when the stream backs up, increased dumping of sediment and damage to plants etc and increased erosion of stream banks.

The Flood Risk Assessment shows at Tables 6.1 and 6.2 that the development will lead to a very significant increase in the rate and volume of run-off, which would clearly make the adverse effect of diverting the run-off into the upper Lilley Brook even worse.

It is not reassuring that the proposals are based only on two hours of heavy winter rain: while the stream can rise very quickly in such circumstances, stream levels can also change dramatically both after much shorter summer cloud bursts (the worst recent floods have been in the summer), and after extended periods of moderate rain.

Subsidiary concerns as regards drainage include pollution of the Lilley Brook by mud and soil etc both while the material is being tipped and afterwards; at present the stream is clouded with sediment at times of heavy rain, but otherwise runs clear. I anticipate that disturbance of the ground and tipping of material will lead to the water being continuously clouded for a protracted period until the soluble material has been washed out. For a volume as large as is proposed that is likely to take years.

The SuDS scheme relies on gradual percolation through gravel. The assessment makes clear both that maintenance will be required to keep the scheme's works clean enough to continue to operate, and that the responsibility for carrying out this work will lie with the golf club. I suggest that the planning authorities should investigate this with the golf club to ensure both that the works required to keep the SuDS in operation are in fact practical (digging up the golf course to clean the gravel?) and that the golf club has made adequate financial provision to carry them out into the indefinite future.

Cirencester Road Traffic: the concern here is the obvious one of a large number of heavy lorries having to negotiate the steep hill down from Seven Springs, including the section where one lane is coned off because the road surface is unstable, and perhaps shedding mud onto the road making it slippery; more distantly, this route perhaps also entails the heavy lorries using Chatcombe Pitch (A436) or Crickley Hill (A417), neither which looks like a good idea! The alternative is to make their way through the constriction between the new Sainsbury's and the Croft Road junction where for much of the time the road width is reduced by parking to a single lane, at least for heavy lorries, busses etc, and complicated by traffic waiting to turn into Sainsbury's, Bafford Lane/Newcourt Road, and Croft Road.

Comments: 14th November 2016

These comments respond the Flood Risk Assessment published on 10 November 2016 and are in addition to those previously made.

The new proposal does nothing to answer points made by others concerning the propriety of this development in an AONB, the nature of the material to be tipped etc.

The new proposal accepts that the development work has the potential to decrease the permeability of the existing ground and so to increase the risk of down-stream flooding. The question is whether or not the proposed sustainable drainage scheme (a ditch and a storage pond) is adequate to dissipate this risk. The primary issue is absolute peak flows - the harm which might come to down-stream properties could well occur over a very short period of excess water - and figure 6.1 of the report indicates a potential for a very substantial (more than double) increase in run off, in a situation where the streams affected already pose significant concerns at times of flood.

In this context, paragraph 6.4 is wrong to say that flood events which exceed the capacity of the storage scheme would result in water running over ground "as per the existing scenario". On the contrary the increased rate of run off would make the risk of serious flooding much worse.

A secondary issue, which I do not think the report addresses, is the rate of flow over longer periods. All the water reaching the storage pond - even at times of more normal rainfall - has eventually to be drained away and at normal times will not be impeded by the flow control device. If there is indeed to be something like twice the current rate of run off, the implication is that at times of normal rainfall the water will reach the outfall more quickly and in an more concentrated period of time than in the past, resulting in faster down stream erosion.

I can judge the quality of the design assumptions and calculations etc in this report only by external appearances, but the repeated inability to tell north from south, the focus on the risk of flooding to the golf course itself, the sketchy representation of the storage pond on the plans, and the statement that "drainage feature alignments are subject to change ... following survey ... and detailed design" do not inspire confidence. I hope that Council will obtain an independent assessment of the scheme before considering granting approval.

34 Hillary Road
Cheltenham
Gloucestershire
GL53 9LD

Comments: 7th April 2016

The views of the Cotswold Conservation Board, as guardians of the AONB, should be the major factor in this decision - this should be the case in all AONB matters. In this specific instance the CCB notes the "major development" is of a type that has become a national issue as golf courses use waste disposal plans to generate profits.

Flood risk assessments are still inadequate even at this second application - the LLFA acknowledges that more information is needed. The proposed eventual discharge into the Lilley Brook raises further issues - can the Brook cope with the extra run-off and, if so, what will the impact be further downstream in the watercourse system; it is likely that waste material chemical extracts and soil/sand will be leached out into the watercourses; what impact will all this run off have on site stability?

Controls and standards must be imposed as part of the planning process or by later permits:

- to cover the physical & chemical nature of the waste material and to ensure that this is monitored throughout the 18 months of the project;
- similarly for the topsoil, to avoid importation of noxious weeds or alien, invasive flora/fauna;
- dust control;
- traffic arrangements to protect A436 from damage, to prohibit use of residential roads in all circumstances (given the likelihood of traffic jams, accidents etc leading to hold ups on the A roads)
- to exclude all site traffic from Sandy Lane

17 Southfield Manor Park
Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DJ

Comments: 11th April 2016

Casual car parking opposite the entrance to Southfield by LBGC users of their practice ground already impedes private and commercial vehicles to Southfield land and property. LBGC must make parking provision on their land.

7 Parkland Road
Cheltenham
Gloucestershire
GL53 9LS

Comments: 11th April 2016

I strongly object to this proposal on the grounds of danger to the local access road users from the high volume of heavy traffic. Environmental pollution from Dust, Noise, etc - all in a rural quiet area used by many people old & young together with their dogs. And also spread out over 18 months.

This development is unnecessary and unwanted by the local residents and is a money generating scheme to help support a failing elitist business.

I also believe the water run-off/drainage changes may lead to flooding of domestic properties

The Little House
Sandy Lane Road
Cheltenham
Gloucestershire
GL53 9DA

Comments: 3rd April 2016

I am submitting this comment on the basis of having been a resident in this road for the last 20 years.

My first concern is that neither the council or the golf club have seen fit to involve residents who would potentially be affected by this development both from the point of view of a significant increase in traffic on residential roads and the noise/nuisance and damage to road surfaces that will inevitably result whilst the work is going on (possibly as long as 18 months).

There is also the considerable concern of a deleterious change in water run off and the increased risk of flash flooding and land slips. In the last few years we have witnessed a number of episodes of flash flooding in our road. The Lilley Brook runs past the back of our house and I have concerns that if work proceeds then this could lead to silting up of the Brook with and increased risk of flooding. I do not understand why the existing practice course cannot be developed into a nine hole course without this landfill and there is the strong suspicion that this is principally a revenue generating exercise to benefit a few hundred club members.

To approve this scheme would result in major short and long term repercussions for local residents.

29 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DF

Comments: 1st April 2016

Before this development is permitted to proceed, we feel that there are certain issues that need to be addressed, as follows:

- The A435 has been under repair for a couple of years now and the ability of the road to withstand the lorry traffic proposed should be properly determined. Consideration should be given to asking the contractors to pay for the strengthening of the road.
- The flood scheme only addresses the issues of surface water and does not explain what happens to the water coming from the springs that rise in the proposed area of development during periods of prolonged rain.
- There has to be proper monitoring of the material being taken to the site and presumably the council will need to devote some considerable resource to this given the volume of material being brought in.

Comments: 14th November 2016

In the new Flood Risk Assessment, it is stated that the OS map shows no springs on the site, but there are springs on the site, notwithstanding that these are not marked, and the impact of these need to be taken into account.

The following clip, taken in June this year, should also be viewed before any decision is made:

<https://www.youtube.com/watch?v=9uof7RVKWHQ>

18 Hartley Close
Cheltenham
Gloucestershire
GL53 9DN

Comments: 12th April 2016

I object to this application for the following reasons:

1. The papers supporting the application are of poor quality and should not therefore be relied on.
2. Paragraph 1 of the Flood assessment states that "The flood assessment is in line with "Drainage Guidance for Cornwall". Why? Has this been cut and pasted from another report?
3. The following statement suggests that the local rivers DO pose a flood risk: "The main hydrological features within the vicinity of the site are the Southfield Brook to the west of the site and the Lilley Brook to the east of the site. Neither of these are considered to not pose a significant risk to the Golf Course."
4. It goes on to say that the land slopes from north to south, this is palpably incorrect.
5. It also states that Sandy Lane will be used as access
6. The applicant denies this last statement.
7. The report also annotates Sandy Lane as a "Claimed Byway Open to All Traffic". Minutes of the County Council Commons and Rights of Way Committee, 6 December 2007 shows that the BOAT application was rejected and Sandy Lane is classified as a "Restricted Byway" and hence only available to non-mechanically propelled vehicles.
8. The flood assessment mentions, a number of times, that there is no risk of flooding to the applicant's site. (e.g. Para 4.1 says: " it is anticipated that groundwater flooding does not pose a flood risk to the site"). Well, what a surprise, it's on a slope (albeit from south to north). The point is that it will divert the flooding to areas down the hill.
9. All of the above seriously brings into doubt the validity of the Flood assessment report; did the author actually take the trouble to read it after it was written?
10. The site is in an AONB and we should make every effort to preserve this asset together with the tranquillity and visual amenity that it provides.
11. The impact on the road network of the massive number of heavy lorries will be huge. As has been stated, the A435 is already in a poor state. Will the applicant make suitable contributions to the maintenance of these roads in acknowledgement of the damage that will be caused?
12. What is "inert" waste? And how will this be policed?

13. The applicant states that there will be 100,000 cubic metres of waste transported to the site and that this will take 18 months. This assumes that there are 100,000 cubic metres of waste readily available. If such a quantity is not readily available then the project will take much longer than 18 months.
14. The golf club has suggested that if this application is successful they may, in future, promote a project significantly bigger. I have seen previous local planning applications that start in a small way and then, when the principal has been established, become much larger.

10 Bafford Approach
Cheltenham
Gloucestershire
GL53 9HP

Comments: 5th April 2016

Many details of the application regarding volumes, loads, flooding possibilities have not been thoroughly investigated and the confidence of the public in knowing the case details is sadly lacking.

Sandy Lane itself is not suitable for heavy vehicular traffic.

I believe that this proposal results from the need to offset the national decline in support for golf. They hope that by improving the facilities they will generate more income. This may happen but only at the expense of the local community to an unacceptable extent. The cost will also rise and thus fewer people will find golf accessible.

Southfield Gate
78 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DH

Comments: 11th April 2016

I am a member of the club. I would like to object to the proposal as submitted. However, my objection is somewhat "procedural", in that I support the club trying to enhance it's facilities and if it sees an opportunity to do so with some financial upside, that can be considered good for the immediate ability of the club to remain viable in the current economic climate. I would like to make several comments in the following sections.

Enhancement to Amenities

The existing practice facility is grossly under-utilized. It is also frustrating in that at the current time, only one green is maintained to a reasonable playable standard. Providing a multi-hole "pitch and putt" facility would be of immediate benefit, allowing not only academy sessions, but allowing several members to practice their short game at the same time.

Financial Considerations

Golf courses across the country are feeling the pinch in terms of a general decline in active members. I think all parties want the club to continue to thrive. It is reasonable for the club to explore ways to bring in revenue. To this extent the proposal cannot really be viewed as being an exercise just to make money nor just a means to enhance facilities - it's both. It would be a much more worrying scenario if the club were forced to sell off parcels of land for development or even worse, completely go to the wall and thereby put the entire grounds at risk of development.

Due Diligence

The application documents a project that is massive in scale. It literally would change the "lay of the land" in the area being developed. There are plenty of concerns raised about the impact of the scheme on water run-off and flooding, land stability and ensuring compliance with all relevant environmental regulations. Another serious concern is that the project carries a significant element of risk, in terms of liabilities which could ultimately compromise the club's ability to survive were something to go wrong in the short or long term. To that extent I think it's essential that the planning committee have to demand that all of the questions relating to these issues are addressed, not by lay people or parties with an interest, but by independent professional assessments.

Adjacent Application

The project proposed is to develop land that is adjacent to a site that has a pending application submitted by CBC for the installation of a flood control scheme (15/02131/FUL). I would hope that the planning committee would not consider these applications in isolation, as it would appear that they both have potential impact on flooding in the immediate area. I agree with others making the comment here, that there is a significant discrepancy in the two applications in terms of the quantity and quality of analysis being submitted to address these issues.

Summary

In summary, I support in principle the idea of the golf course enhancing a facility, bringing in some income as part of this work. However, this project should NOT be allowed to proceed unless all of the necessary work has been done, to a professional standard, to ensure it will not create ANY short or long term problems in the areas documented in the comments already submitted.

Comments: 25th November 2016

I wish to provide some brief comments, further to those made in my previous two submissions. I still classify myself an objector - mainly as I think this status can only be altered based on concerns as actually having being seen to have been addressed.

I welcome the modification of the application to include provisions that are consistent with SUDS methodologies. I do have some reservations about the flow rates being discussed and also the size of the bund and swale being considered. I hope that there is a point in deliberations where those calculations can be validated before approval. Furthermore, if the implementation is found to be deficient, is there some mechanism whereby the applicant can be required to perform remedial improvements if the project is approved.

I gather there is still some concern amongst local residents about access to the site and the possibility that access via Sandy Lane is still open to question. I personally would object most strongly to this - the original application received comments from the Traffic Officer that this was not a feasible idea and I would sincerely hope that there are no concessions made at all in this regard. Local objection to access via Sandy Lane is as strong as ever and I would hope that the plans documenting HGV access from the Cirencester Road are strictly adhered to and enforced.

Lastly, many local people - myself included - believe that this project cannot readily be considered in isolation from another project documented in application Ref 15/02131/FUL. That project involves the construction of a bund in the field to the north & west of the practice ground site. Both of these areas currently affect run-off into the ditches running down Sandy Lane and the surrounding area. It would seem logical that the impact of both projects must be considered together in terms of the combined effect on water run-off management.

I personally captured video evidence of the degree to which run-off from both areas aggregates at the south end of Sandy Lane.

<https://www.youtube.com/watch?v=TzTUn4uCw5g>
<https://www.youtube.com/watch?v=6QlidRfWY4w>

<https://www.youtube.com/watch?v=9uof7RVKWHQ>

The last video in particular shows the run-off coming directly from the practice ground. These videos were filmed on 12th June 2016.

The Brick House
Charlton Drive
Cheltenham
Gloucestershire
GL53 8ES

Comments: 10th April 2016

My earlier comments were submitted on the assumption that the advertised closing date for comments of April 1 was correct. They were therefore submitted in haste. This contribution develops ideas covered in that original. It is based on further analysis of the Flood Risk Assessment submitted by the applicant and reading of the recently published (November 2015) update of The SuDS Manual, largely authored by HR Wallingford and published by CIRIA.

I note that, despite the FRA claiming to propose a Sustainable Urban Drainage Scheme (SuDS), this latest SuDS manual is not referenced in it.

Does the FRA incorporate SuDS principles ?

Earlier reading had failed to identify the extent to which the title of the FRA is misleading. The FRA claims to be a Flood Assessment Risk Incorporating Sustainable Drainage System. In Section 1 of the document (paragraph 3) the purpose of the Assessment is stated to be: "to demonstrate how surface water can be managed in a way to ensure both the playability of the various holes will be improved whilst ensuring that there will be no detriment to the local flood risk".

This statement is a clear indication that the Assessment does not seek to consider off-site impacts. Off-site impacts are a central tenet of the SuDS process.

The importance of off-site factors is clearly stated in the introduction of the latest SuDS Manual. In the opening chapter, entitled The Philosophy of SuDS, there is the following statement. The SuDS approach involves slowing down and reducing the quantity of surface water runoff from a developed area to manage downstream flood risk, and reducing the risk of runoff causing pollution (Section 1.0, paragraph 3).

The proposed SuD scheme is in practice a series of cross-slope interception channels, where none presently exist, linked by a single down-slope channel which would deliver water directly to an off-site stream. It therefore appears that it is intended that the "improved playability of the various holes" is to be achieved by removing as much water as possible from the site as rapidly as possible. This is the complete antithesis of the SuDS approach.

The SuDS Manual continues (again paragraph 3 of Section 1) "This (ie slowing down and reducing the quantity of surface water runoff) is achieved by harvesting, infiltrating, slowing, storing, conveying and treating runoff on site, and where possible on the surface rather than underground."

The FRA presented ignores all of the amelioration options raised by the Manual and does not therefore conform to SuDS principles. Indeed, the proposal cannot be considered to be a Sustainable Urban Drainage Scheme.

Both the anti-SuDS approach adopted and the failure to consider amelioration options are grounds for rejecting the FRA, and hence the entire Application.

Moreover, given the nature of the site, including its impermeable sub-soil, and the proposals made for its use, it is difficult to envisage how all the necessary water control features could be fitted into the limited area of land available for them.

The Sloping nature of the site

The new SuDS Manual has a section (Section C, Chapter 8) that includes a consideration of the application of SuDS principles to Sloping Sites. The following points raised in this section are relevant to the proposed development.

- The difficulty in applying SuDS solutions to steeply sloping sites.
- The importance of effective utilization of storage capacity within SuDS components.
- The likely velocity of water in channels.
- The risks of infiltrating water appearing as spring lines further down the slope.
- Successful SuDS design on slopes usually involves:
 - splitting the run-off catchment into small, manageable, sub-compartments;
 - looking for all potential opportunities for runoff conveyance and storage.

The critical issue of spring lines, which are known to be present on the site, is particularly stressed, with a separate section (8.4.3) devoted to this topic.

Given the sloping nature of the site, all of the above factors are important, but none are dealt with in the FRA. Of particular significance are that the SUDS design proposes that all runoff be channelled into one drain, the converse of good SuDS design, that this drain does not run into a water storage feature and that there is no reference to the springs that are present.

The failure of the FRA to address the issues relating to the sloping nature of the site is a clear reason for rejecting the application.

Chapter 8 of the Manual gives examples of some physical structures that could be used on sloping sites to trap runoff, but these would seem to be incompatible the proposed use of the site.

Land management of a SuDS area

The SuDS Manual also deals at various points with the management of the land from which the runoff is to be collected by a SuDS scheme. For example, Table 4 in the chapter entitled Design for Water Quality includes golf courses as a form of land use that "can be a major source of pollution". Elsewhere, it is suggested that in critical situations the use of fertilizers and pesticides should be kept to a minimum, with specific reference to "ensuring minimal use of herbicides on lawns". It would be reasonable for the Council to make minimal use of herbicides, and pesticides, a condition of any approval that is given. Applying such constraints on this site could restrict its effective use as a golf course.

Strategic Flood Management

Also since my earlier comment I have learnt that some years ago the Borough Council commissioned a review of the need for, and possible nature of, a Strategy for Flood Management in its area. I do not know the full contents of any report, nor whether its recommendations were accepted by the Borough. If there is a strategy in place, then I would expect it to cover some of the matters listed below, and would expect the absence of such features to be an automatic reason for rejecting an Application.

- A requirement for an effective SuDS scheme to be agreed before any proposal for development was accepted.
- Any proposed SuDS scheme to be designed using best practice as outlined in the SuDS Manual, with it being demonstrated that special attention had been paid to the sequential process for such design.

- A minimum requirement of any SuDS scheme that it resulted in a "betterment" of the control of runoff (I interpret "betterment" to mean both reduced flow rates and reduced overall volumes).
- An agreed regime for the future management of any SuDS infrastructure.

Other relevant Planning Applications

I have also in the last few days learnt that the Council is itself applying for Planning Permission for works in connection with flood alleviation for an area near Southfield Manor Park. This site is close to, and in a similar geographical location to, the Golf Club and also has issues relating to surface runoff. The proposed works are for water storage features. The contrast between the quality of the documentation supporting the Council's application and that supporting the Lilleybrook proposal is stark. The Council's being of much higher quality.

Two observations can be drawn from comparing the two proposed schemes:

- That to be approved the Lilleybrook scheme must mirror that of the Council in providing water storage, or an equivalent mechanism, adequate to provide a betterment to the wider drainage system.
- When considering the Lilleybrook proposal, the Council could well use its own application as a guide to the quality and quantity of the information it might require from the Golf Club before the Council can seriously consider that organisation's application.

Comments: 11th April 2016

I would submit a further issue that the Council should take into account when considering this application. This issue is that there may be other, more suitable, locations that appear to be owned by the Golf Club on which the proposed nine-hole and training facilities could be located. The triangle bounded by the three approximate Grid References 961186, 965188, and 966183 appears to be within the boundary of land owned by the Golf Club and to be exploited as a southwards extension of its course. For the purposes of this submission, this triangle can be divided into three parcels of land.

One parcel, lying adjacent to the Cirencester road is occupied by two "golf holes" (ie tees, fairways, hazards and greens). These occupy less than half of the triangle.

West of the two holes there is a very extensive area, much larger than the application site, of grassland that is not currently used for golf. This parcel of land slopes to the east at a relatively uniform angle

To the south of the holes there is a land parcel of complex topography that has a vegetation cover of scrub and grassland. It is not used for golf.

The only apparent distinctions between the western grassland and the course seem to be in the angle of slope and in the cutting regime.

From a distance, there is no indication that there are springs on the parcel of land occupied by golf holes, or that it is affected by any drainage or flooding issues. Springs and flooding are important issues for the area for which planning permission is being sought.

If it is the case that there are no springs in the parcel of land with holes, then it seems likely that there are none in the other two, since they are higher up the Cotswold Scarp.

No features of the vegetation of the two upslope parcels suggest that springs are present.

These observations suggest the following.

It would appear to be other locations owned by the Club where the proposed developments could be located.

The area of land involved is very large and the locations are not currently used for golf.

The topography of these locations and the apparent absence of springs in them would suggest that they could be developed without the need to raise surface levels by the importation of spoil.

With no need to raise soil levels, there would be no associated traffic movements.

The costs of development would be lower.

In contrast to the application site, it seems highly likely that at these locations there would be less, perhaps much less, need to remove surface water to ensure that holes are playable.

If a Sustainable Urban Drainage Scheme were required for these locations, then there would appear, because of their position in the landscape, to be a much greater potential for developing a design that delivers an acceptable level of amelioration and betterment.

Comments: 30th March 2016

You have on file my objections to the earlier application for this scheme. I see nothing in the present proposal, nor its supporting documentation, to alleviate my concerns at the possible impact of approval for the present application will have on properties adjacent to the lower reaches of Lilleybrook stream. Especially one such as myself who has been removing golf balls and sand (from bunkers ?) from the stream since the floods of 2007.

I note the objection lodged by the Cotswold AONB and its reference to Government guidance on the dumping of spoil on golf courses. I see no reason why this guidance should not be an adequate ground for rejecting the proposal.

I note in the documentation references to the nature of the material to be deposited, but do not find persuasive the suggestion that this nature means that Government guidance should not apply in this case.

If the proposal is approved, then I would reiterate the points made in my previous letter regarding the needs for: a clear specification of the material to be dumped; rigorous on site checking of what is being deposited; very careful supervision of process of deposition to ensure that there is good infiltration of rainfall.

I am not familiar enough with the site to know its present drainage state, but I note the following.

- The Topographical Survey suggests a height difference of 20m between the highest and lowest points of the site. This level of slope clearly provides considerable opportunity for surface run-off if the proposed alleviation is not effective.
- The single (at present) supporting comment states that "Recent wet winters have made the lower parts of the golf course very challenging to maintain", presumably as the result of high water levels. It is not clear to me whether the same situation applies to the application site. If it does, then there are reasonable grounds to ask whether the application site is one where the present development is appropriate.

Taken together these issues suggest that much more information is needed before a sound judgement can be made on the merits of the application.

The previous application lacked much necessary documentation. The remainder of this comment relates to the Flood Risk Assessment now provided by the applicant.

I note, Section 3, that the report suggest that the "site is shown to fall from north to south" ! My impression is the reverse!

I note the following relating to this report.

1. No soil or geological information is provided.
2. The report concentrates on flood risk "at the site", using this term on at a number of points.
3. Several sections of the report specifically deal only with the application site.
4. Emphasis is on Groundwater Flooding, with no reference to the possible impact on springs.
On at least one occasion in early 2016 a sudden increase in the level of the Lilleybrook, as recorded by the Environment Agency gauge, did not seem to be linked to any marked rainfall event, but could possibly be explained by a spring beginning to flow.
5. There is no adequate treatment of possible downstream flooding impacts.
6. It is not clear whether the SUDS calculations took account of the severe slope of the site, or whether they assumed a level site.
7. The SUDS amelioration seems to be located uniformly over the site.
8. The report suggests that the proposed SUDS system may give "some degree of natural attenuation" to the rate at which drainage water "enters the watercourse".
9. The diagram showing a possible section of a proposed drain gives no dimensions other than that of a pipe to be placed in it.
10. There is no indication in this diagram, nor in the text, of the likely relationship between the bottom of the proposed drains and the present land surface or any permeable soil layer below that surface.
11. No provision is proposed for increasing the on-site infiltration rate so that the amount of water entering streams is reduced.

Given the above I would make the following points.

- A. A more detailed report, for example dealing with downstream impacts, is needed before any judgement on the application is made.
- B. The possibility that the SUDS proposal might result in "some degree of natural attenuation" in the rate at which water leaves the site is not adequate.
- C. The drains proposed for SUDS alleviation system is scattered across the site and all are linked to a single outflow. Given the steep slope and the permeable nature of the drains, there could be situations in which large volumes of water rapidly reach the lowest point of the site before significant infiltration has taken place. Water storage capacity at this low point might be inadequate for the storage capacity available. If this did happen, then the SUDs proposals would not be effective and downstream flooding would be increased above its present frequency and extent.
- D. Given this possibility, and the other issues above, then alternative SUDS proposals should be explored, aimed at either reducing the rate at water leaves the site or increasing the amount of water infiltrating into the subsoil on site. These might include the following.
 - a. Not linking cross slope drains to a downslope drain, giving increased water storage and infiltration potential across the whole site.
 - b. If a downslope drain is retained, then have larger drains, with a greater water holding capacity, at the lowest points of the site.
 - c. Create a specific water storage feature at the lowest point of the slope.
 - d. Ensure that drains are deep enough to intercept a soil horizon into which water can infiltrate.
- E. If the proposal meets other Council criteria, then approval should be delayed until a system has been agreed that ensures that there is no increase in downstream flooding as a result of that approval.

Given the above weaknesses with the proposal and the potential for a better system, I do not think that the application should be approved.

In my opinion, even an improved application could fall foul of Government guidance.

Comments: 24th November 2016

Thank you for the opportunity to comment on the Flood assessment Report submitted in support of this application. This I do below.

My summary points are as below.

1. The report makes takes no account of the important concept of planning water management at the catchment level.
2. Planning for no increase in the rate of water flow out of the site is unacceptable.
3. The proposed drainage scheme is at odds with the modern guidance for both urban and rural drainage (SUDS and RSuDS).
4. The applicant should be required to develop a scheme that reduces the rate at which water exits the site under flood conditions.
5. The recently approved Southfields scheme creates a precedent for reducing flow rates in flood conditions.
6. Ideally the amount of water passing out of the site in flood conditions should also be reduced.
7. The proposed Sustainable Drainage Scheme misses an opportunity to contribute to the Natural Flood Management scheme for the River Chelt and the Lilleybrook being discussed by the Charlton Kings Flood Action Group.
8. The Stroud Rural Sustainable Drainage (RSuDS) project demonstrates how landowners can contribute at negligible cost to Natural Flood Management approaches that improve water management and reduce flood risk.
9. Any approval of the proposal should be dependent on additional works to both increase water infiltration on site and reduce flow rates out of the site in flood conditions.
10. The Assessment should not be accepted as a final justification for the proposal until such uncertainties within it have been clarified.
11. The overall proposal does not make an adequate case for a new waste disposal site.
12. The overall proposal does not provide adequate information on vehicle movements and their implications.
13. The Council should set requirements for the nature and frequency of maintenance works and for records of these being available for public inspection. I provide justification for these views below. In my judgement the overall proposal should be rejected in its present form.

Fate of surface waters

In my view submitted Flood Assessment is anachronistic in its approach. In particular, it makes nor reference to current approaches to water management in the countryside and makes no suggestions as to how these approaches might be incorporated into the proposed scheme. In contrast to this there are now many schemes, at a wide variety of scales, that take full account of the need to plan water management on a catchment scale, an approach fully supported by the Government and the Environment Agency and legitimised by the implementation in the UK of the Water Framework Directive.

The need to manage water on a catchment scale is implicit in the Sustainable Drainage Systems (SUDS) approach to new developments. The report claims to be SUDS compliant, but it focuses almost exclusively, especially so in Section 4, on the possible impacts of the scheme on the "site". Any reference to land outside the "site" is solely in terms of there being no increased risk of flooding downstream (eg Section 6. 2).

This site based focus is at odds with guidance for Rural Sustainable Drainage Systems (RSDS) issued by the Environment Agency, that defines a RSuDS as a system designed to attenuate water flow by collecting, storing and improving the quality of water. This definition is close to that for urban schemes, also issued by the Environment Agency, that a Sustainable Drainage System approach should include measures to Reduce surface water runoff at source.

Section 6.1 of the Assessment, that seeks to outline the concept of SUDS, fails to mention the Reduction of surface water runoff at source !!

In my opinion any scheme such as that proposed should include both on-site provision, ideally distributed over the site, for water to infiltrate into the underlying geology and a reduction in the maximum rate at which water leaves the site. If permission is given for the development, then it should only be given subject to these conditions.

Flow rate downstream could be reduced by the simple step of reducing the capacity of the proposed Control Device.

A possible precedent for such a requirement might be the recently approved Southfields scheme, where the Modelling Report (dated 16/02/16) predicts a reduction of about 10% in downstream flow rates in flood conditions.

Plan 4.1 in the Report recognises that there are areas of Medium flood risk downstream on the Lilleybrook. This in itself is a reason to consider possible off-site impacts and to incorporate works to both reduce flow rates in flood conditions and to increase infiltration on site.

- The report makes takes no account of the important concept of planning water management at the catchment level.
- Planning for no increase in the rate of water flow out of the site is unacceptable.
- The proposed drainage scheme is at odds with the modern guidance for both urban and rural drainage (SUDS and RSuDS).
- The applicant should be required to develop a scheme that reduces the rate at which water exits the site under flood conditions.
- The recently approved Southfields scheme creates a precedent for reducing flow rates in flood conditions.
- Ideally the amount of water passing out of the site in flood conditions should also be reduced.

Catchment Drainage in Charlton Kings

The Council will be aware of the submission by the Charlton Kings Flood Action Group CKFAG). This Group is seeking to introduce a Natural Flood Management scheme, also known as a Slow the flow or a Working with natural processes approach, to the River Chelt and the Lilleybrook. This project seeks not only to reduce flood risk, but also to enhance the natural status of the two tributaries.

If the Golf Club's proposal is agreed and the scheme goes ahead, then the site would be eminently suitable for incorporation into CKFAG's project. Moreover, such active involvement would clearly demonstrate the Golf Club's support for the SUDS principle of consideration to the requirements of the local community (Assessment, Section 6.1).

The recent, but already successful, Stroud Rural Sustainable Drainage (RSuDS) project demonstrates both the effectiveness of Natural Flood Management and the willingness of a wide range of landowners to be part of it.

- The proposed Sustainable Drainage Scheme misses an opportunity to contribute to the Natural Flood Management scheme for the River Chelt and the Lilleybrook being discussed by the Charlton Kings Flood Action Group.
- The Stroud Rural Sustainable Drainage (RSuDS) project demonstrates how landowners can contribute at negligible cost to Natural Flood Management approaches that improve water management and reduce flood risk.
- Any approval of the proposal should be dependent on additional works to both increase water infiltration on site and reduce flow rates out of the site in flood conditions.

Uncertainties / Lack of clarity

Several sections of the assessment leave scope for clarification. The some examples are given below.

In Appendix B, the nature of the junction between the proposed bund alongside Sandy Lane and the proposed swale is unclear. Is it to be assumed that all water intercepted by the bund will run into the swale?

Section 6.4 of the Assessment (Exceedance Events) ends by suggesting that It is anticipated that this poses a very low risk. It is unclear as to whether the this applies to the occurrence of a greater than 100 year event or to proposed drainage system becoming blocked.

Also in Section 6.4, it is unclear as to both how low risk is defined and on what grounds this judgement is made.

- The Assessment should not be accepted as a final justification for the proposal until such clarifications are available.

Waste and Transport

The Council will be aware of the warnings in the submission by Minerals And Waste Policy Gloucestershire regarding the need that it take account of both all relevant policies relating to waste materials and to the likely implications of transporting the proposed volume of material to the site. Given these concerns, it would appear that proposal:

- does not make an adequate case for a new waste disposal site;
- does not provide adequate information on vehicle movements and their implications.

If the Council considers that these issues do not provide sufficient justification for rejecting the proposal, then it should at least make approval dependant on receiving fully acceptable commitments as to how they will be addressed in a manner acceptable to the Council.

Maintenance of structures

The effectiveness of the proposed Sustainable Drainage Scheme depends on the adequate and regular maintenance of the structures being proposed.

- The Council should set requirements for the nature and frequency of maintenance works and for records of these being available for public inspection.

46 Longway Avenue
Cheltenham
Gloucestershire
GL53 9JJ

Comments: 12th April 2016

There are many reasons to object to this application, most of which have been set out by others, and with which we agree. In addition, a specific and very major issue for some houses on Longway Avenue and Sandy Lane, is the proposal to divert groundwater to the stream which runs between the two roads. We understand this stream caused major issues to a house on its bank some years ago, which resulted in very significant underpinning works having to be done. As it is, the stream also causes constant erosion to the steep banks of the gardens along it. Any additional water could be a very serious issue. This is even shown by the Environment Agency map in the documents. Lastly, the stream is close to our houses and gardens and we would object very strongly if it contained any runoff from whatever fertilisers or chemicals are used by the golf course, let alone possible effects from whatever were to be used for the infill.

By the way, the documents presented on behalf of the golf course read the map of the area inaccurately, getting north and south muddled up, and the elevations wrong. If those making these proposals cannot even do these factual straightforward things correctly, they inspire no confidence whatsoever that this project would be trustworthy.

On a more general point, the golf course company makes no effort to be part of our community. The golf course takes up a large part of the local area, yet offers nothing to local inhabitants. There are many things it could do to be part of the community, from an offer to local youngsters to outreach of various types to other local residents. But it has never sought to be inclusive. This proposal is fully in line with that approach, and we object strongly.

I would also like to make the point that others who are affected have been unable to comment online and by the deadline, one because the online system has not worked for her, and another because he has no access to the internet. The owners of the house which was affected by the stream in the past have also not been able to comment because they are not here at the moment.

12 Hartley Close
Cheltenham
Gloucestershire
GL53 9DN

Comments: 31st March 2016

Many of the negative comments made in connection to the previous unsuccessful application (15/00328/FUL) and which remain on file also apply to this current application, relating to the risks of worsening flooding, the destructive influence in an Area of Natural Beauty etc. In addition we concur with all the comments made by the Cotswold Conservation Board on 22nd March.

This proposed waste disposal and income generation scheme for the Golf Course will have a significant deleterious influence in the AONB - we note that the proposed area abuts closely on the Sandy Lane track which is used extensively as a recreational and leisure facility and is a main pedestrian access to the hill. As regular users of this area for walking, running and cycling, and as residents who are concerned about the environmental and flooding risks in the surrounding area, we object to this proposed development.

Bella Vista
14 Greatfield Drive
Cheltenham
Gloucestershire
GL53 9BU

Comments: 13th April 2016

Letter attached.

52 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DQ

Comments: 13th April 2016

Letter attached.

49 Sandy Lane
Charlton Kings
Cheltenham
GL53 9DQ

Comments: 1st April 2016

It's time for a reality check. Cheltenham Borough Council has submitted a planning application for major engineering works to reduce the risk of flooding to properties in Southfield Manor Park, Hartley Close and Sandy Lane (15/02131/FUL). Obviously the scarp slope adjacent to Sandy Lane has run-off, drainage systems and soil types that have a high probability of generating a damaging flood. The Council's flood alleviation project and its works are contiguous with the proposed land fill and re-contouring work at Lilleybrook. The current ground water drainage of the slope to be developed in at Lilleybrook is working so why would you, in a flood prone area, jeopardise this by large scale alteration of the gradient and the drainage pattern?

The sensible and risk-free approach is to delay approval of the Lilleybrook development until completion of the Council's flood prevention works, ascertain the effectiveness of the works and then assess and understand the impact and risk of the Lilleybrook development.

The risk and frequency of flooding and its traumatic effects is increasing in the United Kingdom. Non-essential projects that increase risk should not be undertaken.

11 Branch Hill Rise
Charlton Kings
Cheltenham
Gloucestershire
GL53 9HN

Comments: 26th March 2016

I am a member of another local golf club but live near Lilley Brook GC and I fully support this application.

Recent wet winters have made the lower parts of the golf course very challenging to maintain and it makes every sense for the club to develop its extensive practice area into a short 9-hole course. This can be used by members and visitors in the winter time and reduce pressure on the lower part which can then recover in time for the summer.

Anything that will improve the financial position of this old and respected club will help to preserve this good golf course and retain a very important open space in Charlton Kings. The pathways are extensively used by local people and provide a lovely space for locals and golfers to co-exist happily. We must avoid any scenario whereby the club sells land for building development. This re-contouring of the practice ground will help to secure the finances of the club and preserve this very pleasant open space.

Comments: 11th April 2016

Letter attached.

10 Hartley Close
Cheltenham
Gloucestershire
GL53 9DN

Comments: 12th April 2016

Waste Management Development/Waste recovery?

At 150,000 tons of waste, deposited in an AONB, it strongly suggests this proposal should come under the scrutiny of the County Waste authority for approval, despite, unsurprisingly, repeated claims to the contrary in the Planning Statement.

9 Hole Mini course

*Planning Statement 7.4 states "*for players including members & non members*". Surely this represents a new venture & is "Pay & Play" by another name?

*Siting the 1st tee & the final green on the most westerly club boundary, immediately adjacent to the Sandy Lane restricted byway, begs the question as to how the club can ensure use by authorised golfers?

It should be further noted, that access from the lane/track, will heavily influence users approach to the course with traffic & parking implications in the event of approval.

*The inadequate capacity of parking at the top of Sandy Lane has already been commented upon however "mitigating" club parking say, within the western side of the course would come with further implications:-

*Golfing traffic would be attracted in the knowledge of parking capacity.

*Increased traffic would ensue on a narrow lane already affected by "rat run" use.

*A new & secondary "Official" entrance to the course would be created without any guarantees that further applications would not be forthcoming.

Further proposals could include "infrastructure" to support the 9 hole course such as permanent buildings to house monitoring staff/storage/ticket sales etc, "unforeseen" in the current project?

It should not be overlooked that a previous application; 70/00142/FUL sought access to the course to allow housing development.

Should current finances be strained, LBGC could well continue to harbour such ambitions, of which this proposal could represent only the first step?

"Pay & Play" courses are generally flourishing, giving some credence to the 9 hole proposal however reshaping a geographically inappropriate area with access issues, to the detriment of local residents & hill users would not appear to present the "exceptional circumstances" required by government guidelines to allow redevelopment of an AONB.

Having already mooted to members a further course "development", involving circa 400,000 tons of landfill & proceeds approaching £2 million on approval of the current application,(Resume' of "Chairman's Forum on Ground Reconstruction"), finance would seem to be the driving force for the proposal at the expense of the local environment.

I concur with all the previous comments regarding noise/disturbance & flood risks & seek the committee's support in rejecting this application.

44 Longway Avenue
Cheltenham
Gloucestershire
GL53 9JJ

Comments: 12th April 2016

Agree with other comments about transport. Even a lorry stuck at Sainsbury's (happens quite often) in Cirencester Road can cause tailbacks, and a Crickley Hill problem can block the whole of CK.

Most concerned with

1. Spoiling the whole atmosphere in Sandy Lane-hope cars will not be allowed access to the new facility from it.
2. Surface water is a problem in the bottom field at back of houses in Longway Avenue and the footpath to Sandy Lane becomes impassable.

Concern about adding more drainage to Southfield brook as some houses in Longway Avenue have already suffered from eroded bank

53 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DG

Comments: 12th April 2016

I cannot support the current application which is disproportionate in its planned use of waste material, has inadequate surface water management controls, and still fails to comply with a number of core planning policies.

I hope the review process will take the public and consultee objections into consideration so that any final plan which might be approved can be suitably amended to secure robust, sustainable and proportionate standards of control that fully address the key issues raised.

- Plan Execution Quality

Given the weaknesses identified in the previous and current application for this development we must have assurance that any plan that may be subsequently approved is properly executed. Given the club's inexperience of managing this type of project on this scale, any approval should have a condition that requires the applicant to pay for a building inspector to conduct regular inspections during construction and on project completion to ensure full compliance with all standards stipulated as conditions for approval.

- Long term site maintenance/ Development longevity

The application should clarify the financial resources and management resources that will be reserved and put in place to ensure the safe management and maintenance of the waste installation after construction and during the lifetime of the development - which should not be less than 25 years.

- FRA - Flood Risk Assessment (FRA)

It is noted that the LLFA has rejected the original FRA submitted and called for more detail. In the next review process the LLFA and planning committee must satisfy themselves on the following matters:

- Construction Phase Risk

Any FRA plan amendment or re-submission presented must include a comprehensive level of detail that demonstrates how the elevated surface water run-off risks are to be safely controlled during the circa 18 month construction phase.

- Use of Sandy Lane for site access

"Appendix A Site Location Plan" of the FRA shows Sandy Lane as the proposed site access track for construction, this must be ruled out of all sections of the plans for the reasons established in the previous proposal for this project.

- SUDS Technical Standards

It has already been demonstrated in other correspondence that the proposed SUDS plan is not adequate. The next FRA plan must incorporate SUDS best practice design standards and controls. Specifically, reference should be made to Section 8.6 of the CIRIA report C753(CRC) concerning potential surface geology instability, and the special risks to SUDS infrastructure that arise when the underlying surface is landfill. Additionally Chapter 25 of the CRC which focuses on infiltration design and methods is very relevant as the current FRA fails to use this guidance to properly consider the extent to which the proposed infiltration systems can and should be used on the site (if at all). Any amended plan submission must detail an authentic SUDS design that is suitable for the soil type and slopes of the site. The amended plan must be specific about which HOST classifications of material have been used to support its storage and run off calculations.

- Cheltenham Surface Water Management Plan (SWMP)

The FRA should apply the SWMP recommendations that define the best practice modeling techniques for supporting site specific flood risk assessment (the council standard appears to be Innovyze's Infoworks ICM software). This or equivalent technology should be used to accurately demonstrate the "before and after" impacts of the proposed development and to support the SUDS plan .

- Sustainable Drainage Core Strategy

Any amended FRA plan should be designed to achieve a greater reduction of surface water than the original greenfield site, as is stipulated in the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy Sustainable Drainage Systems for Local Development Framework Para 5.1.4 . Furthermore Para 5.1.5 recommends that land-raising is not undertaken in such areas to ensure overland flow paths are kept clear.

- Watercourse impacts

The amended plan must clearly document how the SUDS and drainage plan for the development will impact all downstream watercourses.

- Transport Statement

The planning committee should focus on securing road safety, and in addition to approving a design that satisfies a minimum "visibility splay" the committee should insist on the use of the entrance and exit closest to the 30mph zone for access because it will provide a safer visibility framework. At present the applicant operates a one way system for entry and exit from its premises and its site entry point is already positioned closest to the 30mph zone.

- This waste disposal operation should not be located in an AONB as specified in County Policy

The process should take into consideration the recent Appeal Court ruling in "Regina (Lafarge Aggregates Ltd) v Secretary of State for Environment, Food and Rural Affairs and another. In this November 2015 ruling the Appeal Court set aside previous case law and provided a new criteria to define whether a waste use operation should be considered a recovery or a disposal operation. The Appeal Court ruled in that case that since the use of waste material would provide an ecological improvement to the site (using materials generated on the same site) it passed the test for definition of recovery and could be defined as such.

Since the plans to use the waste in the current proposal would not provide any ecological improvement to the site and also not re-use any materials that originated on site, the applicant's suggestion that this development represents waste re-use (or recovery) is inconsistent with this recent case law and must be considered to be a waste disposal operation.

The developer has not provided any reasonable (engineering) evidence to justify the absolute quantum of material required for the proposed development.

The environmental agency has documented tests for differentiating between recovery or disposal operations and these should be applied here. Using their criteria detailed below the suggestion that this operation is a recovery operation fails. Specifically, the tests outlined in Paragraphs 3.13 Direction of Payment (in this case substantial payment moves from waste disposer to landfill site operator) , 3.14 Marginal Benefit, and 3.15 Excessive Quantities, in the document referenced below are all relevant.

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69353/pb13569-wfd-guidance-091001.pdf)

- County Council Referral - Gloucestershire Waste Core Strategy 2012 (WCS)-

The Communities and Local Government letter of 20 Jan 2009 gave clear guidance on the treatment of Large Scale Landscaping Using Waste. Both CLG and Defra consider that landscaping developments of the scale of the current examples involving importing over 100,000 tonnes of waste would not have been undertaken if the material used to construct the landscaping were not waste.

There is a clear case for the waste planning authority of the County Council to be involved in reviewing this application who should review this application against the WCS.

The current proposals are not consistent with the WCS in a number of areas. The WCS has established that there is more than adequate provision for the reception of C and D waste in the county for the foreseeable future. The proposals fail to comply with the spirit or letter of policy statements WCS4 - Inert Waste Recovery - and Recycling, and WCS 8 -Landfill.

This application also contravenes the County's locational strategy which specifies that new waste management facilities to be located outside the AONB in "Zone C".

- Remaining Planning Application Gaps

The Cheltenham County Council Senior Planner's email to the applicant dated 16 April 2015 advised the applicant on what would be required to support any future application following their withdrawal of a similar application 15/00328/FUL.

This proposal still does not fully satisfy those requirements to disclose - the tonnage of waste proposed, the exact origins of the waste, specific details of the "inert" waste composition, details of safeguards proposed to prevent pollution, 5 specified cross sections and a 3d visualization of the site and adjacent area showing the landform before and after re-grading, and an Archeological report.

- Biodiversity Survey and Report

There is no impact assessment of the proposed development on protected species even though the Biodiversity Audit Cheltenham Reference RT-MME-3879-rev01 confirms the presence of protected species in this specific area.

Environmental Permit

Any environmental permit review and application process must include suitable engagement with the public and local planning authorities.

Comments: 5th December 2016

Letter re bat survey attached.

68 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DH

Comments: 11th April 2016

Whilst I am supportive of Lilley Brook Golf Club and wish it to flourish, I object to the proposed practice field development:

Flood risk

The proposal lacks detail in a number of key areas

The current land profile retains water within the practice field and releases it over a broad area

The proposed terracing and drainage will increase the flow of water by a series of land drains routed into a main drainage channel. The plan does not identify the eventual outflow of this concentrated water discharge

The proposal is based upon a terraced design with all land drains routing into a single down drain. The system may not cope with heavy and/or sustained rainfall resulting in unforeseen overflows

To alleviate the risk of flooding, Cheltenham Borough Council have submitted a plan for a bund to retain water running down the same hill. Perhaps constructing a reservoir at the bottom of the terracing would moderate run off whilst providing a water source to irrigate the new greens and tees

An independent consultant, not a subcontractor to the main contractor, should properly assess the risks and produce an acceptable method statement.

Whilst perhaps not a planning issue, was an experienced golf course architect involved in the design of this facility.

Land stability

The proposal does not detail the exact construction method for the terraces.

An independent consultant should evaluate the proposal and establish that the site will be stable during and after construction. The consultant should produce an independent method statement.

Traffic

The plan is premised on traffic entering and leaving the site through the existing car park. Whilst the Highways Agency has not raised an objection I have concerns regarding:

The actual flow of vehicles: it is highly unlikely that a lorry will arrive every 15 minutes as stated in the plan - bunching is inevitable

The safety risk as empty lorries turn right across downhill traffic to ascend the hill

Disruption to traffic driving down the hill: for safety reasons heavy lorries will descend at a speed lower than the existing limit

Disruption to traffic driving up the hill: the road is currently single carriageway and additional heavy lorries will have an adverse affect on traffic flow

Appendix A of the Full flood risk assessment shows access to the site through Sandy Lane, any application should explicitly exclude such access

AONB

I fully support the views of the Cotswold Conservation Board

Other matters

The proposal fails to consider all the issues which the applicant was asked to consider when the previous application was withdrawn

This proposal is based on 100,000 cu mt being delivered in 18 months, the previous proposal was based on 50,000 cu mt being delivered in 4 months. Is this development proportional and could time scales be condensed to minimise the disruption to the local community.

72 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DH

Comments: 25th November 2016

Could you please note for the above planning application.

We are concerned that the building of the practice range will increase the risk of flooding by increasing the flow of water by the stream running next to Sandy Lane.

We would like to reiterate the words of other residents that the bug to collect the water coming off the hill needs to be increased to the largest that is practical.

76 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DH

Comments: 15th November 2016

I do not object to this scheme in principle.

However this application still has concerns.

Appendix A has reverted to proposing access via Sandy Lane. I trust this is a mistake because, for all the obvious reasons given previously, this route is totally impractical. Access must be from Cirencester Road as detailed in the Transport Statement submitted in March.

The FRA refers several times to the fact the site is not in a flood risk area. One hundred metres downstream of the site Sandy Lane has suffered flooding in 2007 and 2016. It is an actual twice in a decade event, not a theoretical once in 100 years.

The video at <https://www.youtube.com/watch?v=9uof7RVKWHQ> shows the volume and force of the water.

Both events were flash floods during the summer caused by run off from the site area. The video referred to above shows the stream that develops on the golf course which discharges into and overwhelms the drainage ditch alongside Sandy Lane. Note that this section of the video was taken after the water had subsided because access was impossible at peak flow.

Appendix B of the FRA proposes an attenuation basin to slow the rate of water released from the site. Despite the desk top calculations it is obvious that the volume of water currently flowing off the site at times of flash flood would quickly overwhelm this small pond.

The FRA states that soil on the site will be more compacted exacerbating the run off issue. The proposed bund seems to serve no useful purpose but would actually divert water down to the pressure point at the bottom of the site. In other words the proposal will increase the likelihood and severity of run off from the site.

I would be in favour of this application if the attenuation basin is constructed at several times the size proposed and have a bund constructed along the bottom of the site or along the boundary of the golf course with Sandy Lane to further attenuate run off from the site into Sandy Lane.

80 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DH

Comments: 1st April 2016

The work will recontour the area by filling in a large natural hollow in the side of the hill. This area is steeply sloped and the landfill will accelerate the runoff of surface water into the various tributaries of Southfield Brook and Lilley Brook. This is already a high flood risk area as evidenced by the excellent analysis undertaken to support the construction of an earth flood bund (application 15/02131/FUL) VERY close to the site of the landfill proposal. It is essential that an independent flood risk assessment is made of the risk to the surrounding area from the planned works.

The application suggests all traffic will access the site via the A435/ A436 roundabout .This should be mandated and enforced by camera recording equipment at the entrance to the club. The road from the hungry horse round about to the golf course has already suffered land slippage .Can we be sure the movement of so many heavy lorries to and from the site will not make this worse (can the landfill agent be made liable for any new damage ?).

The Golf Club has sent a letter to residents making promises. Any approval should be subject to these conditions being met e.g. No movement of materials or equipment outside 8-5 (not 6 as proposed) Monday- Friday, only screened and processed soil imported .good site codes of practice etc.

82 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DH

Comments: 12th April 2016

I object to this application. Many very detailed and compelling objections have been raised in other comments. I wish to make some random observations.

The Flood Risk Assessment contains tables and spreadsheets intended to impress by using accepted percentages and other statistics. However there are no greater experts with knowledge of the risks of flooding in the locality than the residents whose gardens and houses have been flooded in recent times. The land drains proposed for the site carry all the surface water to the west side of the site combining into one at the north west corner. From here the drains are shown, rather optimistically, to carry the flow across the course to combine with the Lilley Brook (this could be a problem in itself). Any silting up in this corner would mean the flow would follow its natural course down the Sandy Lane track to the point where it would combine with the Southfield Brook. This has the great potential to cause flooding further down Sandy Lane, as during the floods of 2007.

A nearby Golf Club recently imported "inert soil" onto its course in a similar revenue raising project. It is my understanding that this unexpectedly contained a large proportion of clay. The course which hitherto had no problem with waterlogging now has one! The quality of the imported material to this site cannot be guaranteed.

LBGC claim that their ambition is to create a mini 9-hole course with specific characteristics to encourage beginners to golf and to form a Golfing Academy. They say the proposals predominantly involve re-contouring and levelling of the site. However, they don't appear to have contacted any Golf Course Construction firms for this purpose. Instead they have encouraged firms experienced in landfill to tender for the project. The applicant is clearly at pains to avoid the possibility that the proposal is a landfill project which would carry implications of greater regulation of the works and many more stringent conditions would apply. The saying comes to mind: "If it looks like a duck, walks like a duck and quacks like a duck - it is a duck!" This is a revenue raising landfill project and should be treated as such.

In their proposal they state that there would only be 3 employees working at the site. Presumably they wouldn't be working with shovels and a rake! The heavy earth moving equipment required will create noise and dust for five days a week (plus maybe a Saturday) for eighteen months. This site is only 150 metres away from my house and will be an unacceptable disturbance for myself and other neighbouring houses over a prolonged period.

6 Hartley Close
Cheltenham
Gloucestershire
GL53 9DN

Comments: 8th April 2016

As a long-standing resident of property adjacent to the proposed development I have to object to it.

1. The benefits it brings to the (very) few seem to be heavily outweighed by the dis-benefits and long-term risks associated with it for the many.
2. The adjacent land is an area of outstanding natural beauty and known for rare and sensitive species of bats and orchids which rely on a chemically clean environment and unmanaged and undamaged land. To place so large a quantity of waste so close to such an area and then turf it over with closely mown and chemically treated grass will inevitably degrade this sensitive environment.
3. Sandy Lane is not so-called for nothing. The underlying geology is relatively unstable and the land below the hill has always been liable to periodic flooding and heavy run-off into the town.

To place so significant development on this land without making extensive special provision for drainage is highly risky. No proper professional calculation has been offered.

4. The extensive investment made for run-off in the Cox's Meadow and Sandford Park areas may not be able to cope with this additional run-off. The risk of these facilities being overwhelmed should be calculated properly. Who would pay for the necessary uplift of these facilities if flooding risk is increased?
5. If flooding risk is increased who would pay for the increased insurance premiums on the affected properties adjacent to the golf course?
6. There is no such thing as inert waste. All such waste carries with it the risk of chemical seepage. The very large volume proposed would be impossible to control and inspect as it was delivered.
7. Golf is a declining sport and increasing facilities for it in a town that already has plenty of facilities is unnecessary. I do not believe there is a true demand for this proposal.

South Lawn
9 The Avenue
Cheltenham
Gloucestershire
GL53 9BJ

Comments: 1st April 2016

1. Lilleybrook Golf Club's website still contains the following statement.

"Lilley Brook Golf Club has an excellent practice ground which offers you the choice of either playing from the grass or the superb Huxley all weather practice mats"

Is there a need for the development of such an excellent existing facility?

2. The application declares that the site is not in a flood zone. However, the watercourses relevant to the application run into an area within Cheltenham classified as a Flood Zone 3. This is the highest ranking within the Environment Agency's classification defined on its website as having a more than 1% chance of flooding every year. This is a critical issue regarding this development and I note that GCC Local Flood Authority (LLFA) have not supported the application.

There needs to be an independent study which must conclude with a high degree of certainty that the flood risk downstream is reduced. There is a real danger that works on this scale could increase the risk.

3. The application should be clearer on the type of waste and how it and the risk of fly tipping is going to be controlled.
4. We agree with the comments made by the Cotswold Conservation Board. Landfill within an AONB does not seem appropriate

7 Parkland Road

Cheltenham
Gloucestershire
GL53 9LS

Comments: 21st November 2016

My wife & I still strongly object to this proposed work. We feel the work will benefit only a small number of "local" residents, and become very intrusive for many more - especially residents adjacent to the club boundaries.

If approved, it is currently unclear if the landfill lorry access will be via the Cirencester Rd or Sandy Lane. If the latter is used that will cause much chaos and damage to the main lane and the BOAT footpath to the south. The bridge over the old railway track is already restricted in weight and who knows what damage might be caused by so much extra heavy traffic. The Lane already becomes congested with parking for Old Pats Rugby events etc. There should be NO vehicle access via Sandy Lane (road or boat) and only pedestrian access to use the long standing footpath across the club as now.

Councillor Baker
Ward Councillor
Municipal Offices

Comments: 15th November 2016

Further to my earlier email some initial comments from me:

1. Do we know that the material will be sourced from within Gloucestershire noting that great play is made on reducing the county's need for reducing waste landfill ?
2. How do we ensure the quality of the landfill, where is it sorted, at source or on site ?
3. There must be a condition which prevents lorries accessing or exiting the site from the south or to the south, this being the case how is that enforced please ?
4. can it be conditioned that after the landfill has been completed the area is developed as proposed and not just left and within an agreed timescale ? Great play is made of enhancing the golf facilities, cynics might think this is a revenue generation exercise as we know that accepting such a large amount of material will in itself generate revenue
5. Can it be conditioned that there is no access to the new facility or the golf course from Sandy Lane and the adjacent bridle way ? We do not want people using this new facility parking in Sandy Lane which is a narrow residential road.
6. Given the extended time scale of delivery over 18 months is it really necessary to allow Saturday working ?
7. Have you seen the video footage of the recent flooding down Sandy Lane which resembled a river and the subsequent flooding downstream around Moored Road ? The report notes the site is a low flood risk, that may be, the concern is the displaced water accentuating the situation we experienced only months ago which caused much damage, but not to homes, the worry is a repeat would result in damage to homes.
8. Where is the response of the lead flood authority ?

68 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DH

Comments: 16th November 2016

As someone who has recently moved to Sandy Lane, I was aware of the proposal to build a 9-hole course on the Golf course. Prior to purchase I checked the proposed plans with regards to flooding and access to the site (both for construction and once finished and open).

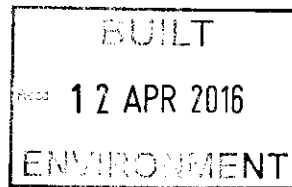
I wholeheartedly object to any of the new planned changes with regards to both any increased Flood risk and access to the site.

Flooding - anything which causes an increased risk to flooding for any of the residents in the area, not just Sandy Lane, should be of major concern and mitigations and guarantees put in place.

ACCESS - Suddenly in Appendix A - there is the proposal to access the site via Bafford Approach and Sandy Lane! This was never in the original proposal - Access was always going to be via Cirencester road and across the golf course itself. I have major concerns about the size and number of heavy lorries and heavy plant equipment that will use this very small access road. Sandy Lane at the top end is barely passable with two cars once you get past Highland Road and it narrows again past Hartley Close. If the A435 doesn't have the capacity to withstand the proposed lorry traffic then Sandy Lane certainly doesn't.

This also sets a dangerous precedent for future access. Not only would this impact detrimentally on the residents but the increased amount of traffic would also create an unnecessary hazard for dog walkers, hikers and cyclists who use this road to gain access to the hills. The walkers, cyclists etc already have to walk on the road as there is no pavement area for them to safely use!

Access must be from A435 Cirencester Road across the Golf Course grounds as detailed in the Transport Statement submitted in March 2016



14 Greatfield Drive
Charlton Kings
Cheltenham
GL53 9BU
8 April 2016

Tracey Crews
Built Environment
PO Box 12
Municipal Offices
Cheltenham Borough Council
GL50 1PP
Ref. 16/00383/FUL

Dear Tracey

Proposal: Landfill and Reprofilng of Practice Golf Area
involving 100,000 cu mtrs of soil off Sandy Lane

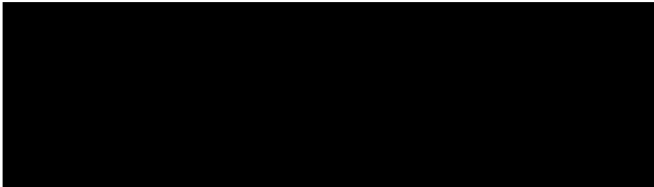
One year ago Lilley Brook Golf Club proposed a very similar Landfill and Reprofilng for the Practice Golf Area involving half this current figure of 100,000 cu mtrs. Like many other objectors I was fearful of the potential flooding consequentials, remembering then the flash flood off the hill which affected properties around Southfield Manor and adjacent area which also undermined the Footbridge linking Old Patesians playing field/Southfield Approach/Everest Road with Greatfield Drive. This vital footbridge was out of action for months and has been closed again in 2015/2016 because it was inadequately repaired and is currently structurally unsound.

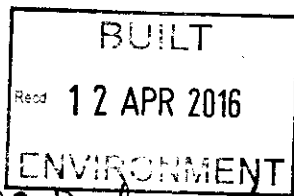
As before I wish to register my objection to this Proposal for both Environmental and Archaeological grounds.

The area is immediately adjacent to the point where the unmade surface of Sandy Lane steepens sharply and is prone to very substantial erosion by water following rainstorm conditions. Any major alteration of the natural profile will affect the water table and associated spring line. This might result in an increase in the likelihood of soil-polluted flash flooding down Sandy Lane whose drainage ditches already require regular maintenance to cope with heavy rain.

My concern from an Archaeological consideration is that a Roman or Romano-British burial was found in the middle of what is now used as the Practice Golf ground. The grid reference is SO 959192 and it was then known as "William's Pit, Sandy Lane." This fact is listed in "Pre-Regency Cheltenham, an Archaeological Survey" compiled by Alan Seville, published and printed by Cheltenham Art Gallery and Museum July 1975. In light of this no Landfilling or Re-profilng should even be considered without obtaining a current assessment of potential archaeological damage using modern methods such as a geo-physical survey etc.

Yours sincerely





52, Sandy Lane
Charlton Kings

12.4.16.

Re: - proposed work at
Lutley Brook Golf Club

Further to our letter written regarding the first planning proposal submitted to you last year, we have looked carefully at the revised plans and ask that, when you meet to discuss whether permission is to be given for the proposed work to go ahead, you will carefully consider the following very important point. We think that

There should be no entrance to the site from Sandy Lane at all. If there is even a small path this will inevitably encourage people going there to be dropped off and cars will be parked up the lane. Many walkers, especially families with small children regularly, and particularly during holidays, weekends and out of school hours. We have already pointed out the dangers that extra traffic ^{will} ensue. Already, entrances to lanes are being blocked all the way up Sandy Lane by overflow traffic when events occur in the local playing field & this would be exacerbated.

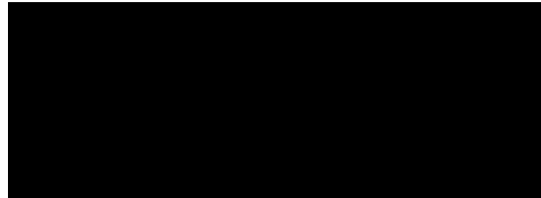
The entrance to the Golf Club should be only from the existing one off the Gloucester Road.
We wonder why plans have been drawn up

to make the new range at such an
inconvenient ~~very~~ distance from the golf club
& car park.

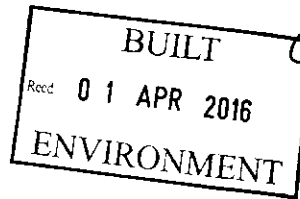
We also foresee that access to this proposed site may
well be sought at a later date.

We object to this.

Yours faithfully,



11 Branch Hill Rise,
Cheltenham,
GL53 9HN.
1.4.16.



Tracey Crews,
Planning Dept,
Cheltenham Borough Council,
Ref. 16/00383/FUL
Dear Mrs. Crews,

This application seems a more reasonable one than last year's, when Willeybrook Golf Club wanted to access their practice ground via the Sandy Lane footpath with about 40 lorry loads of landfill per day. I am concerned that the finished product, if allowed, should not significantly alter the view up Leckhampton Hill from the 10th. tee where the footpath starts to rise near the Sandy Lane gates. This is after all, in the AONB and is one of the best views in the Cotswolds.

Willeybrook Golf Club is ~~one~~ short of members and money. This scheme would bring them income from the builder who gets rid of his infilling material, as well as ensuring all-year round

P.T.O.

play on the proposed mini-golf course on the site of the current practice-ground. Given the wet winters we now experience, the lower level of the course becomes so boggy during November - February, it is often unplayable. The Club may need to sell if the Council turns them down again, and that would probably be to a developer for building-land and I hope it would not count as "bracken-field" if it were sold as it ~~is~~^{is} a club, but it is in the A.O.N.B. so hopefully, it is protected.

Obviously, there would be flooding issues in Longway Avenue and Parkwood Grove if a developer were to divert water from the Lilley brook, as water has to go somewhere. I also very much fear a loss of amenity for the people of Charlton Kings, who use the footpath along the edge of Lilleybrook to access Heckhampton Hill, to say nothing of the desecration of the AONB, which may happen if the Club is not given permission to alter its practice-ground.

Yours sincerely,

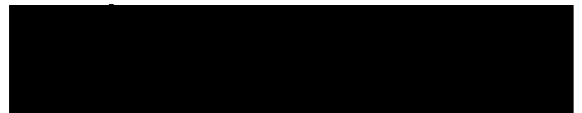
By the Tenth Tee at Willeybrook

(With apologies to John Betjeman)

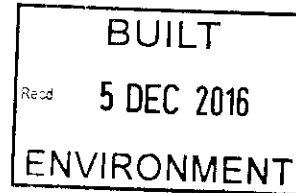
I wander here on sunny days
And look up "Lecky Hill",
A peaceful vista meets my gaze,
The air is balmy, still.
Pray God no builders will arrive
To make me wish I weren't alive....

● I wander here on evenings light
And rest upon the wall
And in the bushes, out of sight,
My dog may find a ball.
How sad I'd be, were we to lose
This very best of Cotswold views.

Beyond the fairway lush and green
There lies the Practice Ground,
The centre of a pastoral scene
Where wild life is found -
Let Man reshape it, but not mar
The Cotswolds with an ugly scar!







53 Sandy Lane
Cheltenham
G53 9DG
4 Dec 2016

Dear Ms Payne

PLANNING APPLICATION 16/00383/FUL

BAT SURVEY

I would like to comment specifically on the bat survey summarized in an email to the planning office dated 4 August 2016.

I am concerned that the survey has been performed does not appear to meet DEFRA requirements, and I wonder whether an undisclosed potential conflict of interest may be present here.

Potential Conflict of Interest

Mr Matthew Kendrick is named at Companies House as an officer of both the ecological adviser Grass Roots Ecology and a Director of Grass Roots Planning the developer.

Grass roots Ecology states on its website "We believe our pragmatic, developer-friendly and cost-effective approach separates us from other companies". This "developer friendly disposition" and the common directorship may be considered by some to impact the independence and quality of this report.

Bat Survey Shortcomings

It is my understanding that there is limited validity to conducting bat surveys on trees in January as it does not fall within the Bat Active season of May to September. Government guidance also states that tree inspections are not recommended in this period.

Contrary to the earlier assertions of the property owner (which denied the presence of bats) the survey has confirmed the presence of the protected bat species in the area and cannot rule out the use by bats of the grand old oak tree that the developer wants to destroy.

The consultants offered mitigant to provide "like for like" provision of bat boxes is contrary to DEFRA policy which states "***Don't use bat boxes as a like-for-like replacement for existing roosts.***" (<https://www.gov.uk/guidance/bats-surveys-and-mitigation-for-development-projects#mitigation-and-compensation->).

The report fails to consider the potential impact of the considerable noise and disturbance over the minimum 18month planned duration of the project will have on bat roosting habits, foraging and commuting routes.

When the presence of protected species are conformed the DEFRA guidance also calls for an Environmental Impact assessment "***Provide an impact assessment showing what effect this development would have on bats if no mitigation were to take place. Include this with your planning or licence application.***"

Grass Roots Ecology has said the "Ecological Assessment" will follow but this is contrary to best practice.

The public and committee have a right to inspect and satisfy itself that the environment impact assessment for the development is presented for public scrutiny so that environmental/ecological risks are properly identified and assessed prior to progressing any approval.

Finally I would also ask it the committee to consider why, since the presence of at least two species of bats on the site has been confirmed, the consultant has not recommended that the developer apply for a Natural England Bat Mitigation Licence.

Accordingly, any progression of this proposal should be held pending receipt of the Environment Impact Assessments.

Also if the development proposal is ultimately sanctioned the approval is conditioned by a requirement that the developer applies for and is granted a Natural England Mitigation Licensing – Bats Licence under The Conservation of Habitats and Species Regulations 2010 prior to starting any work Yours Sincerely

