## EXHIBIT LIST

Reference No: AP2/00025  
Petitioner: Ingestre Park Golf Club  
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Dear Mr Hunt

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

SCREENING OPINION OF STAFFORD BOROUGH COUNCIL IN RELATION TO THE RELOCATION OF INGESTRE GOLF CLUB

I refer to your letter requesting a screening opinion under the above Regulations for the relocation of Ingestre Golf Club which was registered on 1 March 2019 under reference 19/30333/ESS.

The proposal falls within the description of development contained in Schedule 2, Column 1, category 12 (f) – ‘Golf courses and associated development’ of the Regulations. The proposal also exceeds the threshold of 1 hectare set out in Schedule 2, Column 2 of the Regulations with having a site area of approximately 66 hectares.

Schedule 3 of the above Regulations provides criteria for screening all types of Schedule 2 development and groups these under three main headings to understand the character and complexity of any potential impacts, together with any sensitivities which relate to the site. The criteria are set out below.

Additionally, Paragraph 57 of the National Planning Practice Guidance refers to indicative screening thresholds and the key issues to consider, which for golf course developments are considered to be hydrology, ecosystems, landscape and traffic generation.

1. CHARACTERISTICS OF DEVELOPMENT

The proposal
The proposal is for the construction of an 18 hole golf course including practice putting green and short game practice zone covering an area of approximately 66 hectares. The development also includes a club house of around 1,250 square metres over two storeys, a 150 space car park, maintenance building, fuel stores and wash down areas.
The Site
The site is located to the east of Stafford town and comprises a number of agricultural fields which it is stated are of grade 2 and 3 quality. A woodland block is also located within the south eastern portion of the site which does not form part of the proposal.

Criteria (a) – the size and design of the whole development
Whilst details of the design of the golf course and its associated infrastructure have not been provided the size of the site is not considered to be unusual for an 18 hole golf course.

Criteria (b) – Cumulation with other existing development and/or approved development
In addition to Ingestre Golf Club there are two other golf clubs around Stafford at Brocton and Stafford Castle with the latter currently being extended to an 18 hole course. It is acknowledged that the existing course and clubhouse would be closed and transferred to the ownership HS2 following the construction of the new facility which would not increase the concentration of golf courses in the area. No other development is currently proposed and on this basis no significant cumulative impact is considered to result.

Criteria (c) – the use of natural resources, in particular land, soil, water and biodiversity
Existing natural features would be affected with the remodelling of the landscape and the penetration of hedgerows, although the enhancement of existing landscape features combined with new structural planting and any water features could potentially offer biodiversity enhancement through habitat creation.

Criteria (d) – the production of waste
The production of waste through the construction and operational phases are not considered to be unusual, particularly as there would be no importation / exportation of excavated material in the remodelling of the landscape. Waste arising from construction activities would also be expected to be effectively mitigated through the production of a Construction Environmental Management Plan (CEMP) which can be secured by condition. Normal recycling processes are also expected from the maintenance of the course and operations of the club house.

Criteria (e) - pollution and nuisance
There is no record of previous uses of the site or surrounding landfill areas resulting in ground contamination. The main potential risk of pollution is considered to result from pesticides and fertilisers from the maintenance of the golf course and the potential for leakage into water courses. However, golf course developments are common features in rural areas and normal control / mitigation practices would be expected.

Whilst there is likely to be a temporary increase in noise levels during the construction phase the level and duration is expected to be limited and can be controlled through a CEMP. Operational noise is also considered to be limited given the size of the car park and the capacity of the course revolving around tee off times,
although greater levels of noise would be expected on competition days. Overall, the level of noise is unlikely to be significant.

Equally, impacts from lighting are considered to be low, being limited to the area around the club house and car park.

The site is not located within an Air Quality Management Area but it is noted that an Air Quality Assessment would accompany a planning application in respect of air emissions from vehicles. Similarly, dust control measures in relation to the remodelling of the landscape can be controlled through a CEMP.

**Criteria (f) - risk of major accidents and / or disasters**
Given the location, scale and nature of the proposal it is not considered to lead to an increased risk of a major accident.

**Criteria (g) - risk to human health**
No increased risk to human health is considered to arise provided adequate drainage pollution control measures are provided.

2. LOCATION OF DEVELOPMENT

**Criteria (a) – existing and approved land use**
The proposed development is not unusual in its nature and the potential for significant conflicts with surrounding land uses is considered to be low. Potential impacts on designated areas are considered under criteria (c) below.

**Criteria (b) – relative abundance, availability, quality and regenerative capacity of natural resources**
Natural resources in the area of any significant value are considered to be limited including mineral reserves.

Although the majority of the site is within Flood Zone 1 the land around the Staffordshire and Worcestershire Canal to the south is designated as Flood Zones 2 and 3. Whilst a Flood Risk Assessment would accompany a planning application this would also need to include a hydrological assessment in relation to the functioning of ecologically designated sites as explained below.

**Criteria (c) absorption capacity of the natural environmental**
The site lies outside of any formally designated areas in terms of protected biological, geological or conservation interests and is not considered to have significant impacts on the categories of land listed under 2(c) (i), (ii), (iii), (iv), (vi) and (vii).

However, in terms of biodiversity sensitivity under category (v) the site is adjacent to the Cannock Chase Area of Outstanding Natural Beauty (AONB) to the east within which the canal corridor to the east of Holdiford Bridge is designated as a Site of Biological Interest. The Cannock Chase Special Area of Conservation (SAC) is also located further to the south at a distance of approximately 0.6 kilometres. The site is also around 0.5 kilometres from the Rawbones Meadow Site of Special Scientific Interest (SSSI) and 3 kilometres from the Pasturefields Salt Marsh SSSI and SAC.
Provision 2 (1) of the Regulations lists SSSIs, AONBs and European sites (SACs) as sensitive areas. In particular the two SSSIs are designated for their hydrological value in supporting biodiversity features.

In terms of the two SACs the proposal has the potential to negatively impact upon the reasons for their designation via potentially increasing the level of NO\textsubscript{x} deposition upon the site during both the construction and operational phases of the scheme. However, on the basis of the stated levels of construction traffic it is considered unlikely that a significant impact on either European site is likely to occur due to the additional NO\textsubscript{x} deposition arising from the increase in HGV Annual Average Daily Traffic (ADDT).

However, it is noted that the club operation requires a 150 capacity car park which suggests that most members will arrive by car and there may be a high number of daily users. The development may consequently result in a substantial increase in ‘car’ AADT along local traffic corridors, such as the A513 and/or A51 during its operation which (alone or in combination) may constitute a significant impact upon the reason of designation on either of the European sites.

Further information as to the likely increase in daily traffic levels along these ‘A’ roads during the operational phase of the development should therefore accompany an application to allow the Local Planning Authority to undertake a Habitat Regulations Assessment for both sites as the Competent Authority.

Whilst it is unlikely that the development would have significant effects on the SSSIs and Pasturefields SAC from the potential impact on changes to their hydrological regimes further information would need to support a planning application in the form of a hydrological assessment.

The site comprises a number of agricultural fields delineated by hedgerows with a woodland block within the south eastern portion. Other woodland blocks also abut the site and particularly to the south. It is acknowledged that the ecological value of the site is expected to be low being managed farmland, although the submission of a Phase One Habitat survey with a planning application is welcomed. In accordance with national guidance if protected species are found to be present within or on the boundaries of the site further specific surveys would be required before the granting of planning permission in order to secure any necessary mitigation.

Biodiversity gain measures would also be sought through mitigation measures and which would also be secured through a Landscape Environmental Management Plan via a condition.

Concerning category (viii) the site is adjacent to the Tixall Conservation Area to the east and the Staffordshire and Worcestershire Canal Conservation Area to the south. Further to the south are the grade II listed Holdiford aqueduct and bridge and to the south west, beyond the River Sow, the Shugborough Hall estate with its associated designated heritage assets consisting of the Great Haywood and Shugborough Conservation Area, grade 1 registered park and garden and numerous listed buildings and structures. The site is visible from both of the adjacent
conservation areas and views from the Shugborough estate can be gained from Milford Drive at several vantage points

The landscape has an undulating topography with grounds levels predominantly falling from Tixall Road to the north towards the canal to the south and is widely open to views, including public footpath (Tixall 0.1630a) which runs east to west across the southern portion of the site. In this context the recontouring of the landscape through a cut and fill exercise (circa 200,000 cubic metres) combined with new structural planting to delineate fairways, together with tee off positions, greens and bunkers will clearly have a visual impact on the landscape, the settings of the heritage assets and AONB.

It is noted that a Heritage Statement and Landscape Visual Impact Assessment (LVIA) would accompany a planning application however this should also include a Landscape Character Assessment in relation to Staffordshire County Council’s ‘Planning for Landscape Change’ Supplementary Planning Guidance

The submission of a Heritage Statement in conjunction with a LVIA would identify the visual envelope of the development, which is likely to be extensive, together with the significance of the impacts on the heritage assets. However, the impacts are not considered to be sufficient to constitute EIA development, although it would be expected that the design of the course follows a naturalistic, landscaped layout working with the topography and existing features to avoid a mechanical and artificial solution.

In addition to identifying sensitive visual receptors, including the setting of the AONB, the LVIA would also be expected to highlight mitigation measures to reduce the significance of the visual impact of the development.

A search on the Staffordshire Historic Environmental Record has not identified the site to have archaeological recording although it is acknowledged that a geophysical survey would accompany a planning application.

3. TYPES AND CHARACTERISTICS OF THE POTENTIAL IMPACT

In assessing the location, scale, cumulative impact, use of natural resources, production of waste and pollution and risk of accidents it is considered that with appropriate mitigation the significance of these impacts would be limited

The main potential impacts surround the affects on hydrology and designated ecological sites due to changes in ground and surface water drainage from the remodeling of the landscape, together with the visual impact of the development on the setting of the AONB and adjacent conservation areas. However, these are not considered to be of a trans-frontier nature, magnitude or complexity that would require an Environmental Statement.
CONCLUSION

Whilst no detailed reports regarding environmental, biodiversity or heritage impacts were provided with the screening request it is considered that potential impacts are not likely to be significant. As such, an Environmental Statement will not be required, but subject to the following supporting reports accompanying a planning application:-

- Design and Access Statement
- Planning Statement
- Transport Statement
- Flood Risk Assessment including hydrological assessment
- Landscape Visual Impact Assessment including landscape character assessment
- Heritage Statement
- Geophysical survey
- Phase One Habitat survey including Arboricultural Report

In conclusion, Stafford Borough Council does not consider the proposal is likely to have significant environmental effects and is not Environmental Impact Assessment development.

This letter constitutes the formal screening opinion of Stafford Borough Council under the above Regulations.

A copy of this screening opinion has been placed on the Planning Register as required under the Regulations.

Yours faithfully

[Signature]

Head of Development
On behalf of the Council