

**ROYAL BOROUGH OF WINDSOR & MAIDENHEAD
PLANNING COMMITTEE**

MAIDENHEAD DEVELOPMENT CONTROL PANEL

16 October 2019

Item: 1

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| Application No.: | 18/03725/FULL |
| Location: | Land West of Oak Tree Farm Gays Lane Maidenhead |
| Proposal: | Relocation of Maidenhead Target Shooting Club from Braywick Park including creation of car park, erection of clubhouse and toilets, shooting stands, bunds, fencing, landscaping and planting with access off Green Lane. |
| Applicant: | The Chairman Martin Bicknell |
| Agent: | Mr Mark Carter |
| Parish/Ward: | Bray Parish/Bray Ward |
| If you have a question about this report, please contact: Briony Franklin on 01628 796007 or at briony.franklin@rbwm.gov.uk | |

1. SUMMARY

- 1.1 This application is to facilitate the relocation of Maidenhead Target Shooting Club from its former site at Braywick Park in Maidenhead to land at Stroud Farm in Holyport. Planning permission is sought to erect a clubhouse, shooting ranges, a car park, a bund, fencing and associated landscaping. The site would be served by an access track from Green Lane, off Forest Green Road.
- 1.2 The site lies within the designated Green Belt. The proposed development does not fall within the list of specified exceptions for development set out in Paragraphs 145 or 146 of the National Planning Policy Framework (revised 2019) and therefore constitutes inappropriate development. The harm to the Green Belt is afforded substantial weight.
- 1.3 The proposal is considered to have an acceptable impact on the character and appearance of the site itself and the locality in general, residential amenity, the recreational and amenity value of the local public rights of way network, ecology, trees, landscaping and highway safety.
- 1.4 The NPPF sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in Very Special Circumstances. It further explains that 'Very Special Circumstances' (VSC) will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A case of VSC is advanced by the applicant, which in summary comprises:
 - The lack of an available, alternative, suitable site and
 - The benefits to the community and sporting benefits
- 1.5 The VSC and the weight given to these are discussed within section ix of this report. It is not considered that VSC exist in this case that would outweigh the substantial harm to the Green Belt by reason of inappropriateness. The application is therefore recommended for refusal.

Subject to the views of the LLFA on the revised Sustainable Urban Drainage (SuDs) report it is recommended that the Panel REFUSES planning permission for the following summarised reason (the full reason is identified in Section 13 of this report):

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| 1. | The proposal constitutes inappropriate development in the Green Belt which is, by definition, harmful, would impact on openness and should not be approved except in very special circumstances. It is not considered that VSC exist in this case that would outweigh the substantial harm to the Green Belt by reason of inappropriateness. |
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2. REASON FOR PANEL DETERMINATION

- The Council's Constitution does not give the Head of Planning delegated powers to determine the application in the way recommended; such decisions can only be made by the Panel.
At the request of Cllr Coppinger, if the recommendation is to grant permission, on the grounds that residents are very concerned about this proposal and it is essential that the decision is made in public so that objectors have the opportunity of presenting their case.
- At the request of Cllr Rayner, if the recommendation is to refuse the application, in the interest of residents.

3. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

- 3.1 The application site lies to the west of Gays Lane and Oak Tree Farm, a small complex of former agricultural buildings now operating as light industrial units. The site comprises a flat, open field which forms part of Stroud Farm. The site area measures 1.08 hectares in size. There is an existing farm entrance/track which comes off Green Lane, a public bridleway from Forest Green Road.
- 3.2 The site lies in quite an isolated position, approximately 300m from the nearest residential properties, at the northern end of Gays Lane and Langworthy Lane, properties to the west in Moneyrow and properties which lie to the south in Forest Green Road and Green Lane.

4. KEY CONSTRAINTS

- 4.1 The site lies within the designated Green Belt. There is a network of public footpaths which intersect the site and the site is situated close to Gays Lane, a public bridleway. There are ponds and ditches close to the site which provide habitat for Great Crested Newts. There are some mature trees and hedgerows close to the site.

5. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

- 5.1 Maidenhead Target Shooting Club is a members only Club that provides all levels of target shooting for airguns and small bore rifles. The Club was founded in 1906 and is one of the oldest National Small Bore Rifle Association Clubs in the UK. The Club had been based at Braywick Park in Maidenhead since 1967, up until its closure earlier this year. The Club was required to vacate its former Council leased site due to proposals to redevelop the site for a special needs school with ancillary multi-use games area, landscaping and parking, which was permitted on the 18th July 2019 under planning permission 18/02601/FULL.
- 5.2 The Clubs former premises at Braywick Park were located in the Green Belt and provided 25 yard, 50 metres and 100 yard outdoor ranges and a 10 metre indoor range for air pistols and precision air rifle shooting. The facilities included a clubhouse measuring 18.6m by 7m with a covered firing point and included a small kitchen/seating area and reception/armoury area. As a Home Office approved Club, Maidenhead Target Shooting Club is limited to certain classes of guns which include an Air Rifle .177 or .22 calibre; an Air Pistol .177 or .22 calibre; Rim Fire Rifle .22 calibre/LR and HFT Air Rifle .177 or .22 calibre.
- 5.3 The Club has been searching for an alternative site and this application seeks planning permission to relocate the Club to land at Stroud Farm. The site measures approximately 120m in length by 60m in width. The proposal includes outdoor shooting ranges (2 x 25 yard firing ranges, a 50m and a 100 m firing range) and associated clubhouse building comprising a 10m indoor shooting range, kitchen and lounge area, office and toilets. The building would measure 20m by 15m and would have an eaves height of 2.5m and an overall ridge height of 4m. The building would be built using sheet material to give it the appearance of an agricultural building. A 20m long covered shooting point for the 100 yard shooting range is proposed. This structure would have a height of between 2.1m to 2.5m. A 15m long shooting point for the 50m shooting range is also

proposed on the northern end of the proposed clubhouse. The car park would provide 15 parking spaces located south of the building that would be finished in flint gravel. The existing farm track would need to be extended to serve the site and would be finished in tarmac road planings. A backstop measuring 45m wide and 5.5m in height is proposed to be sited at the northern end of the site. It would comprise timber railway sleepers with compacted soil and sand in front. A 2.5m high compacted soil bund is proposed to run down the middle of the site and would be planted with wildflowers. A green chain link fence 2.1m in height is proposed along the western perimeter of the site. Hedgerow and tree planting is also proposed around the perimeter of the site. The rest of the site would be left to grass. The external lighting would be the same as the former club lighting. It would comprise domestic security lights mounted on the shooting stands. They would face the range and spotlight the targets and would be used whilst members are present.

5.4 The operating hours for the shooting club have been confirmed to be:

Monday - closed

Tuesday – 9am-12 noon

Wednesday – 9am-12 noon and 7pm- 9pm

Thursday – closed

Friday – 9am–12 noon

Saturday – 9.30am – 4.30pm

Sunday – 9.30am – 4.30pm

5.5 Access for the site would be taken from the existing farm access off Green Lane. There is an existing farm track which runs around the perimeter of the field which would be extended to serve the new development. During the course of the application the positioning of the access road has been slightly amended. Rather than running diagonally across the field from the mid-point of the existing farm track it is to continue along the existing farm track to the point where it intersects the Bridleway, Gays Lane and then would run in a westerly direction to a point where the footpaths intersect. There would be no vehicular access to the site available from Gays Lane.

5.6

| Reference | Description | Decision |
|---------------|--|----------------------|
| 17/02018/FULL | Change of use of land to facilitate the relocation of Maidenhead Target Club from Braywick Park including creation of car park, erection of clubhouse and toilets, shooting stands, bunds, fencing and associated landscaping and planting at Land at Stroud Farm and west of Gays Lane. | Withdrawn 21.8.17 |

6. DEVELOPMENT PLAN

Adopted Royal Borough Local Plan (2003)

6.1 The main Development Plan policies applying to the site are:

| Issue | Adopted Local Plan Policy |
|---|---------------------------|
| Design in keeping with character and appearance of area | DG1, |
| Impact on Green Belt | GB1 & GB2 |
| Highways and Parking | P4 & T5 |
| Trees and Hedgerows | N6 & N7 |
| Community Facilities | CF1 & CF2 |
| Noise | NAP3 |
| Rights and Way and Countryside Recreation | R14 |

These policies can be found at

https://www3.rbwm.gov.uk/downloads/download/154/local_plan_documents_and_appendices

7. MATERIAL PLANNING CONSIDERATIONS

National Planning Policy Framework Sections (NPPF) (2019)

- Section 2 – Achieving sustainable development
- Section 4 - Decision-making
- Section 6 - Building a strong, competitive economy
- Section 8 – Promoting healthy and safe communities
- Section 9 - Promoting Sustainable Transport
- Section 11 – Making effective use of land
- Section 12- Achieving well-designed places
- Section 13- Protecting Green Belt land
- Section 14 – Meeting the challenge of climate change, flooding and coastal change.
- Section 15 – Conserving and enhancing the natural environment

Borough Local Plan: Submission Version

| Issue | Local Plan Policy |
|---|-------------------|
| Design in keeping with character and appearance of area | SP2, SP3 |
| Development in the Green Belt | SP5 |
| Sustainable Transport | IF2 |
| Managing Flood Risk | NR1 |
| Trees, Woodlands and Hedgerows | NR2 |
| Nature Conservation | NR3 |
| Artificial Light Pollution | EP3 |
| Noise | EP4 |
| Rights of Way and Access to the Countryside | IF5 |
| Community Facilities | IF7 |

7.1 The NPPF sets out that decision-makers may give weight to relevant policies in emerging plans according to their stage of preparation. The Borough Local Plan Submission Document was published in June 2017. Public consultation ran from 30 June to 27 September 2017. Following this process the Council prepared a report summarising the issues raised in the representations and setting out its response to them. This report, together with all the representations received during the representation period, the plan and its supporting documents have now been submitted to the Secretary of State for examination. The Submission Version of the Borough Local Plan does not form part of the statutory development plan for the Borough. However, by publishing and submitting the Borough Local Plan for independent examination the Council has formally confirmed its intention to adopt the submission version. As the Council considers the emerging Borough Local Plan to be sound and legally compliant, officers and Councillors should accord relevant policies and allocations significant weight in the determination of applications taking account of the extent to which there are unresolved objections to relevant policies. Therefore, the weight afforded to each policy at this stage will differ depending on the level and type of representation to that policy. This is addressed in more detail in the assessment below.

7.2 This document can be found at:
https://www3.rbwm.gov.uk/info/201026/borough_local_plan/1351/submission/1

Other Local Strategies or Publications

7.3 Other Strategies or publications material to the proposal are:

- RBWM Parking Strategy

More information on these documents can be found at:

https://www3.rbwm.gov.uk/info/200414/local_development_framework/494/supplementary_planning

8. CONSULTATIONS CARRIED OUT

Comments from interested parties

89 occupiers were notified directly of the application.

The planning officer posted three site notices advertising the application at relevant points around the site on the 11th and 29th January 2019 and the application was advertised in the Local Press on the 17th January 2019.

61 letters were received supporting the application, summarised as:

| 1. | Comment | Where in the report this is considered |
|----|---|--|
| 1. | The Club brings benefits to the community for both young and old. | Paragraphs 9.75-9.88 |
| 2. | Noise – Air rifles and small bore rifles are used, not guns. There is no loud noises or explosions. They are much quieter and far less powerful than other rifles. The air rifle users all use moderators/ ‘silencers’ which are very effective. The sound does not carry and the resulting noise would not startle or even bother a horse or dog walker on the nearby footpaths or bridleways. | Paragraphs 9.20-9.38 |
| 3. | The noise generated by the Club would be nowhere near the level generated by local clay pigeon shoots or other shotgun. | 9.20-9.38 |
| 4. | No noise complaints have been received at its Braywick site. | 9.20-9.38 |
| 5. | MTSC is a small club with a small number of members run purely by volunteers and its very limited budget comes purely from the very reasonable membership fees and range fees. It is run as a small community of local people who welcome people from the local area and who help keep the facilities maintained and in working order. | 9.75-9.88 |
| 6. | It provides a valuable community facility for young and old. | 9.75-9.88 |
| 7. | There are never any traffic issues – people come and go during the day time and there should be no concerns about extra traffic. | 9.45-9.55 |
| 8. | The club brings social and economic benefits to the Borough. | 9.75-9.88 |
| 9. | The sound from the activity would be negligible. | 9.20-9.38 |
| 10 | The sympathetic design would blend into its surroundings and would maintain the openness of the Green Belt. | 9.2 -9.15 |
| 11 | The noise tests carried out found that there is no disruption or noise disturbance to users of the bridle path and the locality. | 9.20-9.38 |
| 12 | Provision of 15 car parking spaces will be more than adequate to serve the requirements of the members. For competitions the hard standing area in the farm yard close to the site entrance can be used. | 9.45-9.55 |
| 13 | Enhanced buffer planting, hedgerow and bunds will create a self-contained site. Buildings will be low level and hidden from view behind Oak Tree Farm. | 9.9-9.15 |
| 14 | The club is not a private club. It is open to anyone with an interest in the sport. | 9.75-9.88 |
| 15 | MTSC is a registered Disability Hub Club with British Shooting and has strong links with SportsAble. | 9.75-9.88 |
| 16 | Support from Local MP Theresa May to find an alternative site within RBWM. | 9.75-9.88 |
| 17 | MTSC is a long-standing sporting facility within the RBWM for over 100 years and is an important asset to the community | 9.75-9.88 |
| 18 | Olympians have and do use the club | 9.75-9.88 |
| 19 | Rifles have a very different sound footprint to shotguns | 9.20-9.38 |
| 20 | Site would have bunds, trees and fauna which would substantially reduce the sound. | 9.20-9.38 |
| 21 | The club is small and the number of active shooting members who train with any regularity is very small. The clubs previous site had a car park that could accommodate 12 cars and it was never an issue. | 9.45-9.55 |

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| 22 | The clubs ability to accept more members is going to be limited as the number of shooting lanes will be less than the previous range. | 9.45-9.55 |
| 23 | The club will not be using flood lit lanes. They will use special LED lights that project a tight laser like beam onto the target face. They are not flood lights and they do not have any spill like ordinary lights have. | 9.19 |
| 24 | The buildings may have security lighting in keeping with the agricultural buildings on site at present. | 9.19 |
| 25 | The building will be in sympathy with the current agricultural units. It will be similar in height to the current buildings and will be set back behind a building. | 9.9-9.15 |
| 26 | The access to the site is via an entrance used by large agricultural plant and trailers. The traffic will not back up onto Forest Green Road. | 9.45-9.55 |
| 27 | The club will be accessed by a private lane and the users of the bridleway and tracks will not be affected. | 9.39-9.44 |
| 28 | The previous range was a haven for wildlife including deer, fox, rabbit, bats roosting etc. | 9.62-9.70 |
| 30 | After extensive exploration of the local area this is the only remaining option to guarantee the future of one of Maidenhead's longest established sporting institutions. | 9.75-9.88 |
| 31 | Members use air powered rifles or small cartridge rifles which have a distinctly reduced noise signature compared to their larger calibre relatives. | 9.20-9.38 |
| 32 | During the preparation of the technical reports no animals were spooked. The sound of small-bore rifles could not be picked up on the monitoring equipment set up adjacent to the kennels. | 9.20-9.38 |
| 33 | The traffic survey is based on actual attendance records which Home Office Approved clubs have to keep. Whilst MTSC has a healthy membership, members do not all shoot at the same time or on the same day. On competition day's people tend to come down, shoot the required targets and leave. In the unlikely event that more parking is required the hardstanding around the existing farmyard will be used. There will be no parking on the roads. The majority of competitions are postal based or internal and hence there will be no additional visitors. | 9.45-9.55 |
| 34 | Building will be alongside an existing barn and shielded from view. | 9.9-9.15 |
| 35 | The club supports the local Scouts in providing a safe and regulated environment for them to enjoy sport. | 9.75-9.88 |

60 letters were received objecting to the application, summarised as:

| Comment | | Where in the report this is considered |
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| 1. | Not a suitable location for a Shooting Club - Site is surrounded by bridleways and footpaths which are used extensively by horse riders, walkers and dog walkers. Noise would be detrimental to the wellbeing of the animals and the safety of riders and surrounding residents. | Paragraphs 9.20-9.38 and 9.39-9.44 |
| 2. | Shooting Club was previously located in Maidenhead Town Centre not in a rural location. | 5.1 |
| 3. | Inappropriate development in the Green Belt. No very special circumstances exist. It will impact on openness of Green Belt and urbanise the rural area. | 9.2 – 9.8 |
| 4. | Could set precedent for other development in the Green Belt. | 9.8 |
| 5. | Additional traffic will be generated on Forest Green Road and surrounding roads. | 9.45-9.55 |
| 6. | Finding nowhere else to build the shooting club does not amount to very special circumstances. | 9.75-9.88 |
| 7. | They have been forced to move from their existing site by RBWM and therefore Council has a duty to find them a suitable site not within the Green Belt. | 5.1 |

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| 8. | The club should be allowed to remain at Braywick Park. | 9.74 |
| 9. | Loss of wildlife habitat and hedgerows. | 9.56-9.61 |
| 10. | Concerned that traffic will use Gays Lane to access the site if correct postcode is not used. | 9.45-9.55 |
| 11. | The vehicular access will cross footpaths and bridleways with increased risk to pedestrians. | 9.39-9.44 |
| 12. | Security lighting would be required and unacceptable light pollution would urbanise rural area particularly during the winter months. | 9.19 |
| 13. | Remote location could attract criminal activity. | 9.17 |
| 16. | Creation of new facilities could result in more visitors and an increase in Club members. | 9.45-9.55 |
| 15. | Noise of guns would be intrusive for local people and wildlife. | 9.20-9.38 |
| 16. | Parking concerns on competition days. | 9.45-9.55 |
| 17. | Cars will cross much used public footpaths. | 9.39-9.44 |
| 18. | Development will detract from the beauty, peace and tranquillity of the area. | 9.20-9.38 |
| 19. | Site is located close to Old Beams Dog Kennels. | 9.20-9.38 |
| 20. | The field and surrounding fields are prone to standing water and to build on it would exacerbate the situation. | 9.71-9.73 |
| 21. | Club should be located at Braywick Park. | 9.74 |
| 22. | Increase in impervious surface area with result in additional surface water run-off increasing load on local ditches and water courses. | 9.71-9.73 |
| 23. | Safety bund, building and facilities are large and unsightly. | 9.9-9.15 |
| 24. | Gay's and Langworthy Lane are unsuitable for increased volumes of traffic. | 9.45-9.55 |
| 25. | There are a lot of equestrian establishments including livery yards, private yards and polo yards in and around Holyport who use the bridleways. | 9.21 |
| 26. | Noise reports only give examples of level of noise for humans and not animals which are far more sensitive to noise. Horses are flight animals and unpredictable and unexpected noise could startle horses causing the rider to fall off. | 9.20-9.38 |
| 27. | The application does not address the harm caused by the noise and light pollution to the local ecology which has a rich diversity of resident and migratory birds, bats and amphibians. | 9.20-9.38 |
| 28. | The council is forcing them to move and has a responsibility to find them a suitable site, | 9.74 |
| 29. | Site contains suitable habitats for Great Crested Newts. | 9.62-9.70 |
| 30. | Forest Green Road is a 50mph road. Extra traffic entering and leaving Green Lane will add to existing potential hazard. | 9.45-9.55 |
| 31. | Danger from ricochets and stray bullets | 5.3 |
| 32. | Impact on local businesses including riding school and boarding kennels. | 9.21 |
| 33. | It is not for the benefit of local residents. | 9.75-9.88 |
| 34. | Noise assessment is flawed. The noise assessment by NSL's indicates that noise from the shooting range will be audible both internally and externally at all assessed noise sensitive receptor locations, contrary to Paragraph 180 of the NPPF. | 9.20-9.38 |
| 35. | The proposal fails to preserve the openness of the green belt and is contrary to Local Plan policy GB1 and GB2 and paragraph 145 of the NPPF. | 9.2-9.8 |
| 36. | The inability to find another suitable site is not sufficient reason to justify a building on this site. The applicant has failed to demonstrate that there are very special circumstances that would outweigh the harm to the Green Belt. | 9.75-9.88 |
| 37. | The low attendance of MTSC members demonstrates that there is not significant demand for a facility in the local area and does not constitute 'Exceptional Circumstances' for the loss of Green Belt land. | 9.75-9.88 |

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| 38 | Other site options have been ruled out on either financial or tenure basis which are not sufficient reason to justify the application as 'very special circumstances'. | 9.75-9.88 |
| 39 | Larger calibre rifles/pistols could be used at some point in the future and greater traffic problems may occur. | 9.45-9.55 |
| 40 | Do not agree with arbitrary conclusion that 58 dB would be a suitable 'target level' for the level of noise that would not cause harm or disturbance. | 9.20-9.38 |
| 41 | Proposal would have an adverse effect on the recreational and amenity value of a public right of way contrary to policy R14. | 9.39-9.44 |
| 42 | The area is currently susceptible to flooding and any new building could increase risk of even more run off from the hard surfaces. | 9.71-9.73 |
| 43 | Old Beams Kennels and Cattery (60 dogs and 50 cats) lies to the south of the site. Animals could suffer distress. | 9.20-9.38 |
| 44 | Ambient noise level of 30dB(a) will be exceeded on a daily basis. Proposal contrary to Policy GB2 and paragraph 123 of the PPG and should be refused on amenity grounds. | 9.20-9.38 |
| 45 | Not clear what the predicted membership will be and the related traffic and noise generation that this will bring. | 9.45-9.55 |
| 46 | Insufficient car parking for potential numbers using the site. | 9.45-9.55 |
| 47 | Shooting club in Marlow that members could use as they live outside Holyport. | 9.85 |
| 48 | Access road would be adjacent to Bridleway. Having vehicles drive up and down so close to the bridleway would be unsafe and dangerous to local horse riders and dog walkers. | 9.39-9.44 |

Statutory consultees

| Consultee | Comment | Where in the report this is considered |
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| Environmental Protection | <p>Comments were initially provided by the Council's Acoustic Specialist on the 8th March 2019. Following an independent noise report submitted by Noise Solutions Ltd (dated 22nd February 2019) on behalf of an objector and concerns raised about excessive noise from residents, a site visit was undertaken to assess the noise of rifles firing at the proposed site on the 9th April 2019. The findings are set out in the additional noise assessment comments dated 30th April 2019 and confirm that at no point was the sound found to be excessive and concluded that noise should not be used as a reason for refusal subject to the imposition of suitable conditions.</p> <p>For full details and analysis on noise and disturbance see section iii below.</p> | Paragraphs 9.20-9.38 |
| Highways Officer | <p>Further clarification was obtained:</p> <p>The width of the internal road, between 4m and 6m is accepted</p> <p>Competitions are spread out over the day and do not usually result in large amounts of parking. Cars could be marshalled and double parked in the car park or overflow into adjoining fields and would not cause congestion on the highway. This is accepted.</p> | Paragraphs 9.45-9.55 |

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| | <p>The gates are now shown to be set back from Green Lane to enable a large vehicle to safely pull clear of the Lane to avoid any obstruction or vehicles having to wait on Forest Green Road.</p> <p>The Highway Authority offers no objection to the proposal and recommends conditions and informatives including a Construction Management Plan.</p> | |
| Tree Officer | <p>The new shooting club and car park is located away from trees and hedgerows and the proposed landscape plan should help to provide screening. There is no objection to the landscaping shown on plan 271/103 but a more detailed landscaping scheme and maintenance program will be required if the application is approved.</p> <p>A new roadway has recently been constructed adjacent to Gays Lane which is located within the minimum root protection area of the mature oak trees growing on the field boundary. The roadway is proposed to be extended to link with the proposed shooting club.</p> <p>It is recommended that the section of road located within the RPAs of retained trees be replaced with a more permeable surface. The proposed road extension should be sited to avoid any of the mature Oak trees. The loss of small sections of hedgerow will be compensated through the planting in other parts of the scheme.</p> <p>Further arboricultural information was requested and received. The details included in the Arboricultural Report state that the farm track will not be used for construction access to prevent compaction damage to the existing mature trees. Details of how the construction traffic will be restricted from using the access will need to be provided as part of the detailed protection measures if the application is approved.</p> <p>No objection to the revised proposals are raised subject to a suitable tree protection condition and landscape conditions.</p> | Paragraphs 9.56-9.61 |
| Lead Local Flood Authority | <p>The submitted FRA and Drainage Statement has not adequately demonstrated that a suitable SUD's scheme is being provided and further information is requested.</p> <p>A further SuDs report has been submitted and the LLFA has been consulted.</p> | Paragraphs 9.71-9.73 |
| Public Rights of Way Officer | <p>There are three Public Footpaths (Footpaths 26, 27 and 28 Bray) and one Public Bridleway (Gays Lane, Bridleway 44) in close proximity to the application site.</p> <p>These public rights of way provide links in a number of circular routes within easy walking distance of residential areas in this part of the borough, and are clearly very well-used.</p> <p>It is considered that the proposed development would have a significant adverse impact on the recreational and amenity value of these public rights of way, and the</p> | Paragraphs 9.39-9.44 |

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| | <p>development would therefore be contrary to saved Policy R14 of the current Borough Local Plan.</p> <p>The site of the proposed Target Shooting Club complex is directly adjacent to Public Footpath 26. Currently the views from these public footpaths are across open fields (save for the existing buildings at Oak Tree Farm) and the addition of the proposed Target Shooting Club building and associated infrastructure would significantly detract from the rural character of these views.</p> <p>The access road to the Target Shooting Club would cut across Public Footpath 26, close to its junction with Footpath 27: motor vehicles using this access road would significantly detract from the quiet tranquil nature of these footpaths, and the access road itself would add an extra area of hard surfacing out of keeping with the locality.</p> <p>The proposed access road would cross Public Footpath 28: vehicles using this access road would significantly detract from the quiet and tranquil nature of this footpath.</p> <p>The proposed Target Shooting Club and associated infrastructure, including the access road, would be clearly visible from Gays Lane (Public Bridleway 44 Bray); this would have a significant adverse impact on views from this very well used public right of way.</p> <p>It is considered that the proposed development would have a significant adverse impact on the recreational and amenity value of the local public rights of way network, contrary to saved Policy R14 and the application is recommended for refusal.</p> | |
| Ecology Officer | <p>The site comprises semi-improved grassland with hedgerows and bare ground and is bordered by a ditch and pond. The site is surrounded by habitat of good suitability for use by protected wildlife.</p> <p>It is recommended that the habitats advice given in Section 5.3 and the precautionary measures detailed in Section 5.4 of the ecology survey report is implemented and secured by planning condition.</p> <p>The site contains habitats suitable for use by Great Crested Newts and results indicate that the adjoining pond has been used by breeding GCN. Further surveys are required to be undertaken to determine the population size class and to inform a licence application to Natural England.</p> <p>Further GCN survey information was received.</p> <p>The Great Crested Newt Survey report details a mitigation plan that if implemented would ensure that GCN are not harmed and their favourable conservation status maintained. As such, if an appropriate condition is imposed, the proposal would be in accordance with planning policy in relation to this species.</p> <p>Summary:</p> | Paragraphs 9.62-9.70 |

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| | <p>The site hosts a population of GCN, may be used by a low number of reptiles, foraging badgers and nesting birds. However any adverse impact upon these species can be mitigated and subject to planning conditions to ensure that these species are not harmed (via the submission and approval of a Construction Environmental Management Plan and by obtaining a licence for development works affecting GCN) there are no objections to this application on ecology grounds.</p> | |
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Consultees

| Consultee | Comment | Where in the report this is considered |
|---------------------|---|--|
| Bray Parish Council | <p>Recommended for refusal; No Very Special Circumstances have been demonstrated, GB1, GB2, F1 and P4.</p> <p>The proposed development by reason of scale, siting and mass would introduce a physical build where no building currently exists, just open fields. As such the proposal would be contrary to National Planning Policy Framework and would represent inappropriate development in the Green Belt which is by definition harmful to the openness of the Green Belt. The applicant has failed to demonstrate that there are any very special circumstances that would outweigh harm this application would have on the green belt, being unable to find another site does not override this NPPF Policy and approval would conflict with the surrounding land, which is agricultural.</p> <p>It is understood that land on which the proposed development sits is liable to flood and no information has been supplied by the applicant as to how this will be addressed.</p> <p>BPC feels there is insufficient on-site parking (only 15 provided for 130 private members) especially when competitions are held neither Green Lane nor Forest Green Road is suitable for parking. The entrance sits on an S – Bend and if cars are parked on or around the entrance it will be dangerous to other road users.</p> <p>The development is surrounded by bridle paths on both Green Lane and Gays Lane which are used by walkers, dog walkers and horse riders. There are many equestrian facilities in the area including Windsor Horse Rangers, a Charity for 180 children aged 8 to 18, who regularly use the bridle paths as they are it is a vital part of the areas riding network. The noise of guns going off is a major concern as horses can easily be spooked by this and it could deter horse riders not to use them and back onto the roads. Therefore, if this development is allowed it would be to the detriment of other users of the bridle paths.</p> <p>To date with this and the previous withdrawn application (17/02018/FULL) over 100 residents have written in to object.</p> <p>Additional comments received in response to revised site plan and additional information (received 14/8/19):</p> | <p>Paragraphs 9.2-9.8</p> <p>9.20-9.38</p> <p>9.75-9.88</p> <p>9.71-9.73</p> <p>9.45-9.55</p> <p>9.39-9.44</p> |

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| | <p>Recommends refusal – BPC reiterates the previous recommendations for refusal and adds the following due to the application not demonstrating any very special circumstances – citing from Appeal Ref: APP/TO355/W/18/3206635 Les Lions Farm, Ascot Road, Holyport, SL6 2JB.</p> <p><i>17. I conclude on this issue that while facilities for outdoor sport would be appropriate, it would not preserve the openness of the Green Belt which is one of its essential characteristics, and its encroachment into the countryside would conflict with one of the purposes of including land within it. Accordingly, the proposal would not be one of the exceptions to the construction of new buildings in the Green Belt which should be considered inappropriate, placing it in conflict with paragraph 145b of the Framework and LP policies GB1 and GB2, where they are consistent with the Framework. Inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</i></p> | 9.20-9.38 |
| Sports England | <p>Sport England considers this proposal addresses an identified need for this facility type and has the potential to be of benefit to the development of shooting. We would wish to see this accorded an appropriate weight in the decision that is reached on this application.</p> <p>The proposal also fulfils the requirements under the National Planning Policy Framework paragraph 97 bullet point b) in that the sports facility is replaced due to the redevelopment of the site under planning application 18/02601.</p> <p>Sport England offers its support for this application.</p> | 9.75-9.88 |

Others

| Group | Comment | Where in the report this is considered |
|-----------------------------------|--|---|
| RBWM Access Advisory Forum | The Access Advisory Forum supports this application on the grounds that provision is made for disabled parking spaces and access to both indoor and outdoor ranges will be accessible to people with disabilities. | 9.75-9.88 |
| The Holyport Preservation Society | <p>Gays Lane in Holyport is a quiet bridleway which is enjoyed for leisure purposes by children, adults, dog walkers, cyclists and horse riders. It is a peaceful, tranquil and an entirely unspoilt area of Holyport. The location of a gun club in this area is entirely inappropriate for a number of reasons.</p> <p>This application is in the Green Belt and should be rejected on that point alone. There are no special circumstances that should lead to its approval. These are green fields and residents of Holyport want to protect them and our Green Belt.</p> <p>The majority of gun club users do not live in Holyport, so it is not a benefit for local residents. Although the application states that Gays Lane will not be used for vehicular access it is beyond dispute that the presence</p> | <p>Paragraphs 9.20 – 9.38</p> <p>9.39-9.44</p> <p>9.45-9.55</p> |

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| | <p>of such a facility will bring traffic to this peaceful area. Traffic from club members and the ancillary needs of the establishment. This is not what residents and leisure users want.</p> <p>The use of guns, however discreet, however well and securely maintained and however well policed is simply utterly inappropriate here.</p> <p>The Holyport Preservation Society is entirely opposed to this application and urges councillors to reject it.</p> | |
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9. EXPLANATION OF RECOMMENDATION

9.1 The key issues for consideration are:

- i The Principle of the development in the Green Belt
- ii Impact on the character and appearance of the site itself and the locality in general
- iii Impact on the living conditions of surrounding properties, including noise and disturbance.
- iv Impact on the recreational and amenity value of the local public rights of way network.
- v Impact Highway safety and parking
- vi Impact on trees and landscaping
- vii Impact on Ecology
- viii Sustainable Drainage
- ix Other Material Considerations
- x The case for Very Special Circumstances

i The Principle of the development in the Green Belt

9.2 The principle planning consideration in this case is the appropriateness of the development within the Green Belt. The site is currently an open field which lies within the designated Green Belt and there is no built development on the site.

9.3 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (paragraph 133 of the NPPF). The five purposes of Green Belts include 'c) to assist in safeguarding the countryside from encroachment'

9.4 Paragraphs 143 and 144 of the NPPF state that:

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

'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'

- 9.5 Paragraph 145 of the NPPF states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include:
'b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;'
- 9.6 Saved Local Plan policy GB1 provides a list of development which would be acceptable in the Green Belt which includes *'b) essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it'*. Saved policy GB2 reinforces the qualifications on openness and purposes, stipulating that permission will not be granted for development if it would have a greater impact on the openness of the Green Belt, or the purposes of including land in it, than the existing development. Whilst policies GB1 and GB2 are not wholly consistent with the Framework Policy GB2 (a) is almost identical to that of the NPPF and is essentially compliant with the aims and objectives of the NPPF.
- 9.7 The proposal involves the change of use of the land for outdoor sport and recreation and includes associated facilities. The clubhouse building includes an indoor shooting range which would not be an appropriate facility for outdoor sport and recreation. The site is currently an open field and the proposal would involve the erection of a sizeable clubhouse building and other associated structures including the backstop, shooting shelters, perimeter fencing, car park and an extension to the access track. The proposal would also generate vehicle movements associated with the use. The proposal would not preserve the openness of the Green Belt, which is one of its essential characteristics. The provision of built structures on what is currently an open site would impact on spatial openness, and whilst in some views the structures would be viewed against the back-drop of the existing adjacent farm buildings, their size and spread across the site would also impact on the visual openness of the Green Belt. The resultant encroachment into the countryside would conflict with one of the purposes of including land within the Green Belt. Accordingly the proposal is considered to constitute inappropriate development in the Green Belt which is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (VSC). The proposal would be in conflict with paragraph 145 b) of the NPPF and Local Plan policies GB1 and GB2 where they are consistent with the Framework.
- 9.8 Each application must be considered on its own individual merits. The development must now be considered against all the relevant material considerations below and then further consideration needs to be given in the context of the VSC exerted by the applicant to establish if the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

ii Impact on the character and appearance of site itself and the locality in general

- 9.9 The design and appearance of a development and the impact it has on the character of an area is a material planning consideration. Paragraph 127 of the NPPF sets out the design principles expected of new developments and paragraph 130 states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area. Saved Local Plan policy DG1 and emerging policy SP3 adopt a similar approach and set out design principles which are consistent with those of the NPPF.
- 9.10 The application has been accompanied by a Landscape and Visual Impact Statement to assist in the visual assessment of the proposal.
- 9.11 The site currently comprises a flat, open field and is rural in character and appearance. The site is visible from a number of public vantage points including the network of public rights of ways, to the south of the site. Other views are more distant and the site lies adjacent to a small complex of buildings at Oak Tree farm which helps to screen the site from the bridleway, Gays Lane to the east.

- 9.12 The main clubhouse building has been designed to have the appearance of an agricultural building and would be clad in sheet materials of a neutral colour (green or grey). The height of the building would not exceed 4 metres. The buildings and other structures would be fairly low in stature with the exception of the backstop which would be 5.5m in height and constructed with railway sleepers and soil and sand. This structure would be set well back within the site towards the northern end and only limited views of this structure would be available from the public domain. The other structures would include a 2.1m high chain link fence around the perimeter of the site, a car park and an extension to the existing access track.
- 9.13 The application has been accompanied by a comprehensive landscaping plan to help reduce the visual impact of the proposal. The site already benefits from some existing screening including an established hedgerow with individual trees along the eastern boundary. The hedgerow is proposed to be supplemented by native plants including Hawthorn, Wild Rose and Elder and trees including Hornbeam, Native Cherry and Field Maple. Views of the site from the east including Gays Lane would be somewhat limited given the amount of existing screening and the existing group of buildings at Oak tree Farm.
- 9.14 The site is more readily visible from the public footpath running close to the southern perimeter of the site and longer views are also available from the network of public footpaths and bridleways to the south and west of the site. A native hedgerow and numerous trees are proposed to be planted to include Field Maple, Hazel, Hawthorn, Holly Wild plum, Wild Rose, Elder and Wayfaring Tree to help screen the development.
- 9.15 A more detailed landscape scheme and a maintenance scheme would need to be secured by condition in the event of planning permission being granted to help mitigate the visual impact of the development on the rural character of the site itself and the locality in general. On balance, it is not considered that the proposed structures would appear unduly prominent or obtrusive or would be significantly harmful to the character and appearance of the site itself or the locality in general so as to warrant refusing the application on this basis. Overall it is considered that the proposal complies with paragraphs 127 and 130 of the NPPF, policy DG1 of the Local Plan and policy SP3 of the submission version of the Emerging Borough Local Plan.

iii Impact on the living conditions of surrounding properties, including noise and disturbance.

- 9.16 Paragraph 180 of the NPPF states *'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*
- a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
 - b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
 - c) Limit the impact on light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'*
- 9.17 Local Plan policy NAP3 states that the Council will not grant planning permission for proposals likely to emit unacceptable levels of noise, smells or fumes beyond the site boundaries. Emerging policies EP3 and EP4 refer to light and noise pollution. Development proposals should seek to avoid generating artificial light pollution where possible and proposals that are likely to have a detrimental impact on neighbouring residents, the rural character of an area or biodiversity should provide effective mitigation measures. Development proposals that generate unacceptable levels of noise and affect quality of life will not be permitted. The Club has operated successfully for many years from its site at Braywick Park and there is no evidence that the site would attract any criminal activity.

Impact on light, outlook and privacy

- 9.18 The nearest residential properties are situated some 300m from the proposed site and it is not considered that the proposed development would have any adverse impact on the amenities of these properties in terms of light, outlook or privacy. Likewise it is not considered that the amount of vehicle movements generated by the proposal would result in an unacceptable level of noise and disturbance to these neighbouring properties.

Light pollution

- 9.19 The applicant has confirmed that the Club do not use flood lights. They use special LED lights that project a tight laser like beam onto the target face. The external lighting would be attached to the low level shooting shelters and would only be required during the winter months after dark. In the event that planning permission is granted further details of the external lighting including siting, design (Luminaire type and profiles, mounting height, angles and energy efficiency measures) to ensure no undue harm to the neighbouring amenity and rural character of the locality, could be secured by condition.

Noise and Disturbance

- 9.20 A significant number of the objections received to the application have referred to the potential noise and disturbance resulting from the proposed rifle ranges. The application has been accompanied by a Noise Report prepared by Michael Sugiura Acoustics Consultant. A Noise rebuttal in response to this report has been received from Noise Solutions Ltd dated 22nd February 2019 which was submitted on behalf of Mr Edward Butler of Primrose Farm, Langworthy Lane.
- 9.21 There is a considerable amount of concern raised by local residents to the impact the proposal would have on the living conditions of surrounding residents, commercial businesses including Old Beams kennels and cattery situated to the south of the site and the impact that it would have on the peaceful tranquillity of this countryside location and the enjoyment of the network of footpaths and bridle ways including Gays Lane which are well used by dog walkers, horse riders and walkers. There is concern that any sudden noise from the proposed shooting range could spook the horses and result in accidents.
- 9.22 The Planning Officer and the Council's Acoustic Specialist has undertaken its own exercise to assess the noise of the rifles on the proposed site and the findings are set out below. The assessment took place on the 9th April 2019, 3 Members of the MTSC were present together with their Acoustic Consultant, Michael Sugiura.
- 9.23 The rifles previously fired at Braywick Park and proposed to be fired at the proposed site would be air rifles and rim fire rifles. The rim fire rounds are 0.22 (5.6mm) calibre. These rounds are very small and the whole round is about the same size as a pound coin. A picture showing a rim fire casing fired by the rifle used is shown in Appendix E. The small size of the round means that there is only a small amount of explosive in the round. As a result there is only a small amount of energy, including sound energy, released by the explosion when the round is fired.

Nature of the Sound

- 9.24 When fired the air rifle sounds like a hiss from the air line on a lorry, but not as loud. It makes a pssst sound. The rimfire rifle produces a pop sound. The sound is not what you would expect from a gunshot from a shotgun. There is no bang and it is significantly quieter than a shotgun shot. The rifles being fired did not induce the shock that would be experienced standing so close to a shotgun. Rimfire rifles can be fitted with a moderator that reduce the volume of the sound when the gun is fired. Rimfire rounds and guns fire a round at less than the speed of sound so there is no sonic boom from the round. The unmoderated rimfire gun was the loudest noise so this was used to assess the sound impact of the gun fire.

Appropriate Noise Standards

- 9.25 There is no appropriate noise standard for the noise of a gun range. The Chartered Institute of Environmental Health (CIEH) 'Clay Target Shooting: Guidance on the Control of Noise' uses a shooting noise level (SNL) to assess the noise of shotgun shots. Whilst not totally appropriate, the methodology of using SNL was agreed as the best standard available with the applicant's Acoustic Consultant and the SNL in several locations, including the nearest property to the north on Gays Lane, was calculated. At some of the locations including the location nearest Old Beams Kennels on Forest Green Road, the SNL could not be calculated because the sound of the shots was too quiet due to distance attenuation.

Monitoring

- 9.26 The monitoring took place between 14:00 and 16:00 on the 9th April 2019. There was steady rain from 14:00 which stopped at about 15:00. The rain prevented the use of sound measuring equipment. Aircraft overhead were approaching from the west to land at Heathrow. The shots were fired in between the noise from aircraft overhead.
- 9.27 In terms of the existing noise environment the location is predominantly rural open fields and trees. There was the sound of passing traffic on Green Lane, Gays Lane and Forest Green Road. There was the sound of a tractor working the fields and dog walkers calling their dogs. The loudest and most disruptive noise in the location was the sound of aircraft overhead descending to land at London Heathrow Airport. Often the sound of these aircraft was so loud that they interfered with conversation.
- 9.28 The rounds were fired on the proposed site towards the north. The firing was arranged to take place in groups of 5 rounds at a time. A non-moderated rim rifle was used as this is the loudest rifle that would be fired.

Observations

- 9.29 As the distance from the shooters increased, the volume of the sound of the shots decreased. The sound of the shots was masked by the sound of aircraft and bird song. Bird song was not disturbed by the shooting. Apart from immediately behind the shooters, the sound of the shots was only noticeable if it was listened for. Conversation would have masked the sound and the sound would not have interfered with the conversation.
- 9.30 The table below shows the observations and a map is provided in Appendix E to show the numbered locations for the noise monitoring.

| Number | Location | Observations | Predicted SNL |
|--------|---|--|---------------|
| 1 | 3m behind shooters | Pssst from air rifles Loud pop from unmoderated rim fire rifle Quieter pop from moderated rim fire rifle | 90 dB (A) |
| 2 | South of Oak Tree farm, close to Gays Lane | All 5 shots heard, but only audible if listened for. Volume or nature of the sound unlikely to cause alarm such as startle horses. | 61 dB(A) |
| 3 | Gays Lane parallel to shooters | All 5 shots heard, but only audible if listened for. Volume or nature of the sound unlikely to cause alarm such as startle horses. | |
| 4 | Nearest residential property on Gays Lane (North) | 3 out of 5 shots heard. Sound masked by bird song, which continued unaffected by the shooting | 53 dB(A) |
| 5 | South end of Gays Lane, junction with Green Lane | 0 out of 10 shots heard | |
| 6 | Junction of footpath | 3 out of 5 shots heard. | |

| | | | |
|---|---|---|--|
| | with Primrose Lane (west of site) | | |
| 7 | Primrose Lane – approximately 100m north of kennels | 2 out of 5 shots heard. No barking from dogs heard. | |

Other Mitigation

- 9.31 The application includes a bund between the 50 and 100 metre ranges as well as a sand bund backstop to ‘catch’ the rounds. The sand backstop would reduce the noise in two ways. It would ‘catch’ the rounds in sand so there will not be the ‘thwack’ heard from the rounds hitting the wood. The backstop would also be a noise barrier reducing the noise heard by the residents to the north of Gays Lane.
- 9.32 The bund between the 50 and 100 metre ranges would act as an acoustic barrier. The bund and sand backstop would be acoustically soft surfaces that would absorb the sound reducing any echo effects. The club house would also act as a sound barrier reducing the noise heard to the east on Gays Lane.

Suggested Additional Measures to Reduce the Noise

- 9.33 The noise heard and the calculations in the acoustic report show that the noise of the gunfire would be acceptable.
- 9.34 Sound barriers such as grass bunds measuring 1.5m – 2m to the east and west of the firing range could be added to provide extra sound benefit and to screen the ranges, however the provision of these bunds are not required in order to make the development acceptable.

Noise from the internal range

- 9.35 Noise from gun shots from the firing range inside the club house can be controlled by acoustically treating the clubhouse and these details can be agreed by condition.

Conclusion

- 9.36 The applicant’s Acoustic consultant has calculated the worst case shooting noise level SNL at the nearest property, to the north of Gays Lane to be 53 dB(A) and this level is likely to be reduced by the sand backstop. This would be below the lowest observed adverse effect level (LOAEL) referred to in the Noise Policy Statement for England (NPSE) which is the level above which adverse effects on health and quality of life can be detected.
- 9.37 From the reports submitted and the sound of the shots heard, the sound impact of the proposed gun range would be below the LOAEL and noise pollution cannot be used as grounds to refuse the application. In the event of planning permission be granted conditions would however be required to restrict the types of rifles that could be fired, a scheme of sound insulation to attenuate the noise of shooting within the building, restriction on the opening hours and a noise level condition in order to protect the amenities of the surrounding properties and the character of the countryside.
- 9.38 On this basis the application is considered to comply with paragraph 180 of the NPPF, Local Plan policy NAP3 and emerging policies EP3 and EP4.

iv Impact on the Recreational and amenity value of the local public rights of way network.

- 9.39 There are three public footpaths (Footpaths 26, 27 and 28) and one public bridleway (Gays Lane, Bridleway 44) which lie in close proximity to the application site. A map showing the public rights of ways is provided in Appendix E. These public rights of way provide links into a number of circular routes within easy walking distance of residential areas in this part of the borough and are

well used. There are also a number of equestrian establishments in the vicinity of the site which use the surrounding bridleways.

- 9.40 Paragraph 98 of the NPPF states '*Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users...*' Local Plan policy R14 states that '*The Borough Council will safeguard and enhance the public rights of way network and recreational cycle routes.*' Emerging policy IF5 states that '*Development proposals will be supported provided that they protect and safeguard the existing rights of way network and do not adversely affect the recreational and amenity value of the existing rights of way network...*'
- 9.41 Many of the local residents and the Public Rights of Way officer have raised concern that the proposal would have a significant adverse impact on the recreational and amenity value of the surrounding public rights of way and consider that the development would be contrary to Local Plan policy R14. The Rights of Way officer has concluded that the proposal would significantly detract from the rural character of the views from these well used public footpaths and public bridleway, Gays Lane. In addition the access road would cut across Public Footpath 26, close to its junction with Footpath 27 and the existing access track crosses Public Footpath 28. He considered that motor vehicles using the access track would significantly detract from the quiet and tranquil nature of these footpaths. Photographs showing the site when viewed from Public Footpath 26 and 27 are included in Appendix E.
- 9.42 With the exception of the buildings at Oak Tree Farm, the current views from public footpaths 26 and 27 are across open fields and there can be no doubt that the proposal would alter the views from this network of public footpaths and bridleways. However as set out above in section ii, on balance, it is not considered that the proposal would appear unduly prominent or obtrusive or would be significantly harmful to the character and appearance of the site itself or the locality in general so as to warrant a refusal of the application on visual amenity grounds. Whilst the development would be visible from the adjoining footpaths and to a lesser extent the bridleway, Gays Lane, it is not considered that it would detract from the enjoyment of the adjoining public footpaths and bridleways to warrant refusing the application. Likewise the proposal would generate a low level of traffic activity and it is not considered that the amount of vehicle movements generated by the proposal would significantly detract from the quiet and tranquil nature of the footpaths and bridleway or make it unsafe for horse riders and dog walkers.
- 9.43 Many of the residents have raised concerns about the potential noise and disturbance that the proposal would have and its impact on the enjoyment of the adjacent bridleway and public footpaths which are well-used by horse riders and dog walkers. However under section iii set out above it has been adequately demonstrated that the proposal would not generate a level of noise and disturbance which would detract from the enjoyment of the public rights of way or have an adverse impact on the well-being of animals and the safety of the horse riders.
- 9.44 Overall it is not considered that the proposal would cause sufficient harm or have an adverse impact on the recreational and amenity value of the public rights of way sufficient to warrant a refusal. The proposal is considered to accord with Local Plan policy R14 and emerging policy IF5.

v Highway safety and parking

- 9.45 Local Plan Policy T5 expects new development proposals to comply with the Council's adopted highway design standards. Paragraph 109 of the National Planning Policy Framework (NPPF) sets out that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 9.46 The application has been accompanied by a Transport Statement.
- 9.47 The site is proposed to be accessed via the existing farm access off Green Lane, a public bridleway, close to its junction with the B3024 Forest Green Road. A farm track currently runs around the perimeter of the field to a point where it intersects Gays Lane. At this point the track is proposed to be extended in a westerly direction to serve the development.

- 9.48 The width of the internal access road has been confirmed to range between 4m and 6 m wide and given the nature of the use this width is considered acceptable. The alignment of the road enables the access onto Forest Green Road to achieve clear unobstructed views to both left and right.
- 9.49 The club currently has 130 members and opened 3 days a week (Tuesday, Wednesday and Friday) between 9am and noon and Wednesday evening between 7pm-9pm and at weekends. The traffic survey carried out in October 2018 shows that the club generated between 4 and 9 vehicle movements during its opening hours which are outside peak times. It is clear that the club generates an exceptionally low level of traffic activity. Therefore the Highway Authority has confirmed that the proposal would have no detrimental effect on the local highway network.
- 9.50 It is proposed to provide 15 parking spaces. The parking demand is estimated to be no more than 7 vehicles on a week day and 10 vehicles at the weekend. The proposed car park would be adequate to serve the parking demand for the day to day club activities. However the club holds 2 competitions per year in May and June. The applicant has confirmed that competitions are spread over the whole day with people attending at staggered times throughout the day. The competitions do not usually result in large amounts of parking however on competition days cars could be marshalled and double parked in the car park or could overflow into adjoining fields or on the existing hardstanding, close to the entrance to the site.
- 9.51 During the course of the application a resident of Green Lane raised concern that when the farm gates are closed/locked vehicles can block the entrance to Green Lane resulting in vehicles having to wait on Forest Green Road. The gates are now shown to be set back from Green Lane to enable a large vehicle to safely pull clear of Green Lane before the gates are opened and closed.
- 9.52 Parking for the disabled is to be provided and the building and site would be fully accessible to persons with impaired mobility and to persons with other disabilities. The Highway Authority has raised no objection to the proposal subject to appropriate conditions and informatives including a Construction Management Plan.
- 9.53 Some residents have referred to the potential for the use to intensify and the number of members to increase. The applicant has clarified that based on current club records only 9 people would use the ranges at any one time. If it is used to full capacity there could be 4 people using the indoor range and 10 people using the outdoor ranges, a total of 14 persons at any one time. The arrivals and departures of members are staggered. The applicant has also confirmed that the move is to facilitate the continuation of the club at the current membership levels and that there are no plans to increase membership or intensify the use of the site beyond the previous levels at Braywick Park. During its time at Braywick Park no campaign to increase membership was ever conducted. It is stated that the target shooting community is relatively small and specialised, it does not attract the same level of interest as some of the other shooting disciplines and there are no plans for the club to branch out into other disciplines. A condition could be imposed to restrict the use to particular rifles in order to limit its use.
- 9.54 The level of additional traffic generated by the proposed development would have an acceptable impact on the highway network. The shooting club would have limited opening times and this could be conditioned in the event of planning permission being granted. The arrivals and departures recorded by the club show that traffic activity is spread throughout the morning with no more than 4 or 5 cars arriving in any one hour.
- 9.55 On the basis of the information submitted it is considered that sufficient car parking would be provided and there would be no detrimental impact on the highway network or highway safety. The proposal complies with Local Plan policies P4 and T5.

vi Impact on trees and landscaping

- 9.56 Local Plan policy N6 requires applications to include a detailed tree survey, tree protection measures and an appropriate tree planting and landscaping scheme. Policy N7 requires the retention of hedgerows and will not permit development which would result in the loss of or threat to important hedgerows. Where hedgerow removal is unavoidable, replacement and improved planting will be required.
- 9.57 The proposed shooting club and car park are located away from existing trees and hedgerows. A planting plan and schedule, drawing number 271/104 provides tree and hedgerow planting around the perimeter of the site. The 2.5m high compacted soil bund in the middle of the site is to be seeded with wildflowers and the rest of the site, with the exception of the parking area, would remain as grass. The proposed landscaping and tree planting scheme should help to screen the development and no objection is raised to the landscaping scheme shown on drawing number 271/103 subject to more details and a maintenance program being provided. These can be secured by condition.
- 9.58 Additional tree information was provided during the course of the application in the form of a revised tree survey report, arboricultural implications assessment and protection recommendations (June 2019). A survey of the 10 trees that lie adjacent to the existing farm track has been carried out. The trees are located either in the verge at the side of the existing ditch or in the hedgerow between Gays Lane and the farm track. Drawing number 271/101 shows the positions, tree categories and the root protection areas (RPAs). It has been confirmed that construction vehicles would not use the existing farm track to avoid ground compaction within the RPA's. Details of how the construction traffic would be restricted from using the existing track would need to be provided as part of the detailed tree protection measures and this could be secured by condition. It would however be expected that access would be via Stroud Farm, situated to the north east of the site and not via Gays Lane.
- 9.59 The outer edge of the proposed east to west section of access road would be located at least 1.5m from the outer hedgerow alignment. The existing farm track is in regular use by heavy farm machinery and it is not considered that the additional vehicle movements generated by the shooting club would add significantly to ground compaction where the track passes across the tree RPAs and the trees should therefore be unaffected.
- 9.60 A small section of hedgerow would need to be removed to accommodate the access. However, new hedgerow planting is proposed around the perimeter of the site which would compensate for this loss.
- 9.61 Overall it is considered that the proposal complies with Local Plan policies N6 and N7.

vii Ecology

- 9.62 Paragraph 174 of the National Planning Policy Framework states that plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. Policy NR3 of the submission version of the emerging Borough Local Plan is consistent with the NPPF and sets out that development proposals will be expected to demonstrate how they maintain, protect and enhance the biodiversity of application sites.
- 9.63 The application has been accompanied by an Ecological Appraisal (July 2018) and a Great Crested Newts survey (May 2019). The survey was undertaken in the spring/summer of 2019 to determine the population size and the ecological constraints and opportunities in relation to GCN associated with the proposed development.
- 9.64 The application site comprises semi-improved grassland with hedgerows and bare ground and is bordered by a wet ditch and pond. The site is surrounded by habitat of good suitability for use by protected wildlife. Former farm buildings lie to the east, grassland and arable fields to the south,

north and west (connected by hedgerows), and woodland 230m north and west. The nearest protected species records are for pipistrelle bats located over 600m away.

Habitats

- 9.65 The site is bordered by native-species hedgerow on the eastern and southern boundaries and along the access road. The hedgerow constitutes a Habitat of Principal Importance under Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006 i.e. it is 'Priority Habitat' as per the NPPF. The tree officer has noted that a small section of hedgerow will need to be removed to accommodate the access. However, new hedgerow planting is proposed around the perimeter of the site which would compensate for this loss.

Fauna (excluding great crested newts)

- 9.66 The site contains some, albeit limited habitat that is suitable for use by reptiles particularly along the hedgerow and ditch and the vegetation on site is likely to be used by nesting birds and badgers may forage on the site. These species are unlikely to be adversely affected by the proposals and as long as a mitigation plan, such as that outlined in section 5.4 of the ecological report is implemented, the presence of these species/species groups should not be a constraint to the proposal. A condition requiring the submission and approval of a Construction Environmental Management Plan will be required in the event of planning permission being granted.

Great Crested Newts (GCN)

- 9.67 Six waterbodies within 500m of the site were surveyed for great crested newts GCN. All waterbodies hosted low numbers of GCN and as such, since GCN spend most of their lives on land within up to 500m of their breeding ponds, the proposals in the absence of mitigation, could adversely affect them.
- 9.68 The potential impacts upon the GCNs that could arise as a result of the proposals were identified and include:
- The potential for killing/injury of small numbers of newts
 - The potential for pollution of the waterbody adjacent to the site (SW1) and local ditch network in the absence of appropriate mitigation measures during construction.
 - The loss of low quality core terrestrial habitat for great crested newts
 - The creation of new higher quality terrestrial habitats (meadow, hedgerow and hibernacula).
- 9.69 The GCN survey report details a mitigation plan which if implemented would ensure that GCNs are not harmed and their favourable conservation status maintained. As such providing a condition is imposed which requires a licence for development works affecting GCNs to be obtained from Natural England and appropriate mitigation measures to be carried out, which could include a trapping and translocation process under license, no objection is raised to the application on ecology grounds.
- 9.70 The proposal accords with paragraph 174 of the NPPF and emerging policy NR3.

viii Sustainable Drainage

- 9.71 The site lies within Flood Zone 1. Paragraph 165 of the NPPF requires major development, such as this, to incorporate sustainable drainage systems (SuDS) unless there is clear evidence that this would not be appropriate. A Flood Risk Assessment and Drainage Statement has been submitted along with a further SuDs report.
- 9.72 The Flood Risk Assessment states that the majority of the site is considered to be at a low risk of surface water flooding. However, the Risk of Flooding from Surface Water mapping actually indicates that the majority of the site lies within the medium risk envelope (equating to a risk of flooding in any given year of between 1% and 3.3%). Some of the residents have also referred to

standing water on the site and the surrounding fields and have raised concern that the development could exacerbate any flooding and increase run-off from the site.

- 9.73 In summary the latest SuDs report recommends that the optimum drainage solution for the site would be to discharge surface water into the drainage ditch adjacent to the eastern boundary of the site. SuDs features include a rainwater harvesting butt, shallow swales and attenuation basin to provide a minimum surface water attenuation volume of 56 cubic metres prior to discharging at a controlled rate to the drainage ditch. A shallow depression or swale is recommended adjacent to the proposed access road to intersect surface water runoff from this feature. The final views of the LLFA have been sought and a Panel Update is to be provided.

ix Other Material Considerations

Loss of community facility

- 9.74 Local Plan policy CF1 does not permit the loss of existing community facilities and buildings unless it is satisfied that there is no longer a need for them or an acceptable alternative provision is to be made elsewhere. The Maidenhead Target Shooting Club was required to vacate its former Council leased site due to proposals to redevelop the site for a special needs school with ancillary multi-use games area, landscaping and parking which was permitted on the 18th July 2019 under application number 18/02601/FULL. It was acknowledged in the consideration of that application that the proposal would result in the loss of a sporting and community facility. It was however concluded that the benefits of the proposal at Braywick Park would outweigh the conflict with policy CF1.
- 9.75 The relevant extract from the Panel report on 18/02601/FULL stated the following: -

Sports England has been consulted and have provided comments on the application. They note that the lease for the club has expired and that the club are in the process of trying to relocate. Regarding the proposed development Sport England also acknowledges the need for the school and the potential for links between the school and the various sports clubs at Braywick Park, including, Maidenhead Archers, SportAble and Maidenhead Rugby Club, which will add value to the experience of the pupils sporting lives and would be consistent with the Department of Media, Sport and Culture's and Sport England's strategies around young people. On this basis Sport England have raised no objections to the application. It is also noted that the school will be provided with its own multi use games area and will have use of the new Leisure Centre being developed on the site of the old driving range. The proposal conflicts with paragraph 97 of the NPPF, however this conflict is considered to be outweighed by other considerations. The existing target shooting club is considered to be a community facility. Policy CF1 of the RBWM Local Plan sets out that the loss of community facilities will not be supported unless there is no longer a need or an acceptable alternative provision is to be made elsewhere. Maidenhead Target Shooting Club is in the process of finding a new home, however, at the time of writing a new site has not been secured. There is some conflict with policy CF1 therefore, however, this is considered to be outweighed by the benefits that the proposed development would provide.

x The case for Very Special Circumstances

- 9.76 With reference to the exceptions listed in paragraphs 145 and 146 of the NPPF it is considered that the proposal would constitute inappropriate development in the Green Belt. Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and such development should not be approved except in Very Special Circumstances (VSC). Paragraph 144 of the NPPF states that Very Special Circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

- 9.77 The Courts have not defined 'very special', beyond confirming that the words must be given their ordinary and natural meaning as contained in R(Chelmsford BC) v First Secretary of State [2004] EWHC 2978 (Admin):

'The words 'very special' must be given their ordinary and natural meaning. Since the expression 'very special' is so familiar, any attempt at definition is probably superfluous, but for what it is worth, the Shorter Oxford English Dictionary tells us that special means:

Of such a kind as to exceed or excel in some way that which is usual or common; exceptional in character, quality or degree. The circumstances must not be merely special in the sense of unusual or exceptional, but very special'

- 9.78 The decision-taker has to exercise a qualitative judgment and ask whether the circumstances, taken together, are very special.

Harm to the Green Belt and Any Other Harm

- 9.79 In accordance with Paragraph 144 of the NPPF, any harm to the Green Belt in relation to inappropriateness, conflict with the purposes of including land within the Green Belt and harm to openness should be given substantial weight against the development. The proposal is considered to be inappropriate development in the Green Belt, and therefore, by definition, harmful to the Green Belt, is contrary to one of the purposes of the Green Belt to assist in safeguarding the countryside from encroachment, and would result in a reduction in both visual and spatial openness. Overall, this amounts to substantial weight against the proposal.

- 9.80 The applicant has put forward a case for VSC in the 'Supporting Statement on Town Planning Matters' containing 'Very Special Circumstances' and 'Very Special Circumstances' update December 2018 Search for Sites. A map has also been provided which identifies some of the various locations of the alternative sites looked at. A summary is provided below:

- Maidenhead Target Shooting Club is held in high repute within the shooting fraternity.
- MTSC provides high quality shooting facilities to a wide range of people.
- MTSC is a non- profit organisation set up to provide shooting facilities for the population in the area.
- It operates in partnership with Sportsable and is also registered as a Disability Hub Club with Shooting GB.
- It hosts shooting evenings for one of the local Scout troops.
- The Club is no longer able to operate at its existing site as a result of the Council's redevelopment proposals for Braywick Park.
- It has not been possible to find a suitable site within the Borough, outside the Green Belt. Most of the Borough is constrained by Green Belt, and other designations such as flood plain, Conservation Area etc. and a site within a built up area would be too close to residential uses.
- The Club is a very popular and successful club fulfilling one of the aims of the Olympic Legacy.
- It has the full support of the National Small-bore Rifle Association.
- The loss of the facility would result in a major gap in shooting facilities in the Borough.
- The proposal would incorporate significant landscaping provision to reduce the impact of the building on the surrounding area.
- The proposed site would not cause any harm through noise, ecological or highways impact or impacts on the amenities of neighbouring properties.
- Support received from Theresa May MP to find an alternative site within the Borough.

Lack of an available, alternative, suitable site

- 9.81 The key part of the applicants Very Special Circumstances (VSC) case is the lack of availability of alternative suitable sites. A sequential test has been undertaken to assess the suitability of potential sites. A suitable site is considered by the applicant to be one with sufficient space to accommodate equivalent facilities and in a rural or semi- rural location, not located near sensitive uses such as residential properties. The report concludes that all the alternative sites identified

are either unsuitable or unobtainable and that following an extensive search, the application site is the only site the Club has been able to progress.

- 9.82 A total of 26 alternative sites have been looked at, although not all of them are identified on the Ordnance Survey map provided. It would appear that all the sites identified within the Borough lie within the designated Green Belt. There are some sites which lie beyond the Borough boundary in Bourne End, Wokingham and Reading. The sites discounted were done so for a variety of reasons including:
- Outside the Borough
 - Necessary facilities could not be provided
 - Only short term lease/contract offered.
 - High rent
 - Conflict with other land users.
 - No communication/response – owners did not wish to proceed
- 9.83 After extensive efforts only one site was found to be potentially suitable and available at Stroud Farm (the application site) where the Club could lease the land for a suitable period of time. The Club contend that this is the only remaining option to secure the future of one of Maidenhead's longest established sporting institutions.
- 9.84 Having reviewed the alternative sites and the reasoning put forward there is concern that most of the sites have been ruled out for financial or tenure reasons and not for sound planning reasons. It is not considered that it has been properly demonstrated that other more suitable sites, for example on 'previously developed land' cannot be found. The lack of available alternative sites can only be given 'limited' weight in this instance. Whilst it is acknowledged that the club is relocating from another Green Belt site in Maidenhead, the former premises were tucked away and not readily visible. The proposed site is an open field and its visual impact on the openness of the Green Belt would be considerably greater.

The benefits to the community and sporting benefits

- 9.85 Sports England supports the application and considers that the proposal addresses an identified need for this facility and has the potential to be of benefit to the development of shooting.
- 9.86 By their own admission, Maidenhead Target Shooting Club is a relatively small club, with a small number of members. There is only a limited demand for the facility in the local area and whilst the Club welcomes people from the local area, a significant number of the members come from outside the Borough.
- 9.87 It is however acknowledged that the club has served the shooting community in Maidenhead for a considerable number of years and contributes to the local recreation facilities for the disabled and all ages, and contributes to the provision of sporting participation both within the Borough and the Southern Region. On this basis 'considerable' weight should be given to the sporting benefits of the proposal.
- 9.88 No weight can be given to the proposed improvements to landscaping or the fact that the proposal would cause no harm through noise, ecological or highways impact or impacts on the amenities of neighbours. Any economic benefits could also only be given 'limited weight'.
- 9.89 Overall it is not considered that the harm to the Green Belt is clearly outweighed by these considerations either individually or cumulatively. The proposal constitutes inappropriate development in the Green Belt and no Very Special Circumstances have been adequately demonstrated to outweigh the harm.

10. COMMUNITY INFRASTRUCTURE LEVY (CIL)

The proposed development is not CIL liable.

11. CONCLUSION

The proposal is considered to constitute inappropriate development in the Green Belt which is, by definition, harmful to the Green Belt. This harm attracts substantial weight. The proposal would not preserve the openness of the Green Belt, which is one of its essential characteristics, and its encroachment into the countryside would conflict with one of the purposes of including land within the Green Belt. The benefits of the scheme put forward by applicant are not considered to outweigh the harm to the Green Belt and any other harm. Therefore, it is considered that VSC have not been adequately demonstrated to justify the proposal and the proposal is contrary to Local Plan Policies GB1 and GB2 (a), BLPSV policy SP5 and the guidance set out in Section 13 of the NPPF.

12. APPENDICES TO THIS REPORT

- Appendix A - Site location plan
- Appendix B – Layout plans
- Appendix C - Elevation drawings
- Appendix D – Tree survey, protection and planting plans
- Appendix E - Photographs and maps
- Appendix F – Layout of former facilities at Braywick Park.

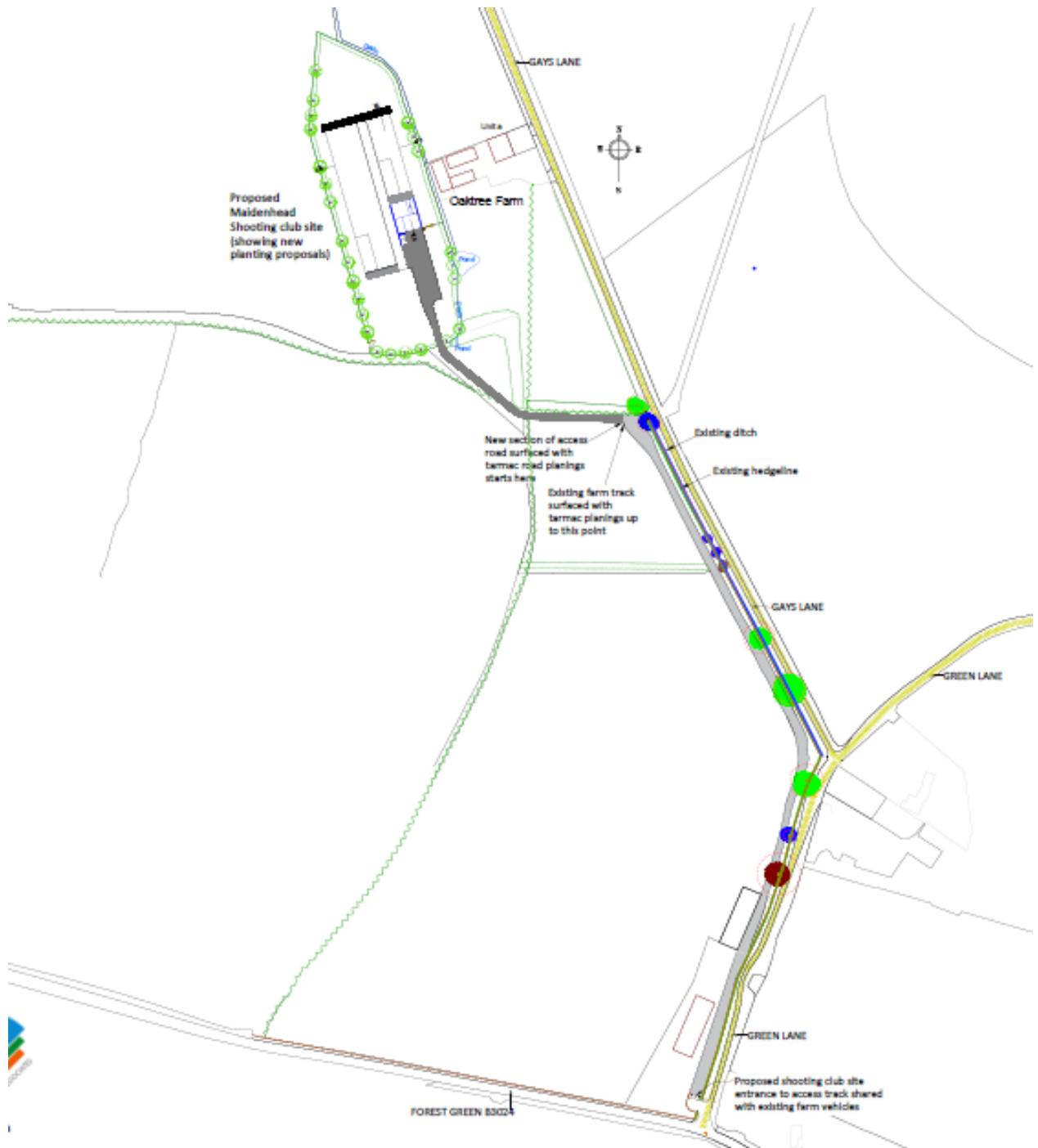
13. REASONS RECOMMENDED FOR REFUSAL

- 1 The proposal represents inappropriate development in Green Belt, which is by definition harmful to the Green Belt and would conflict with one of the purposes of the Green Belt, namely 'to assist in safeguarding the countryside from encroachment', and would be harmful to the openness of the Green Belt. No Very Special Circumstances have been demonstrated that clearly either individually or cumulatively outweigh the harm to the Green Belt and any other harm. The proposal is therefore contrary to the provisions of saved policies GB1 and GB2(a) of the Royal Borough of Windsor and Maidenhead Local Plan 1999 (Incorporating Alterations Adopted in June 2003), policy SP5 of the Borough Local Plan Submission Version (2017), and paragraphs 133, 134, 143, 144 and 145 of the National Planning Policy Framework (2019).

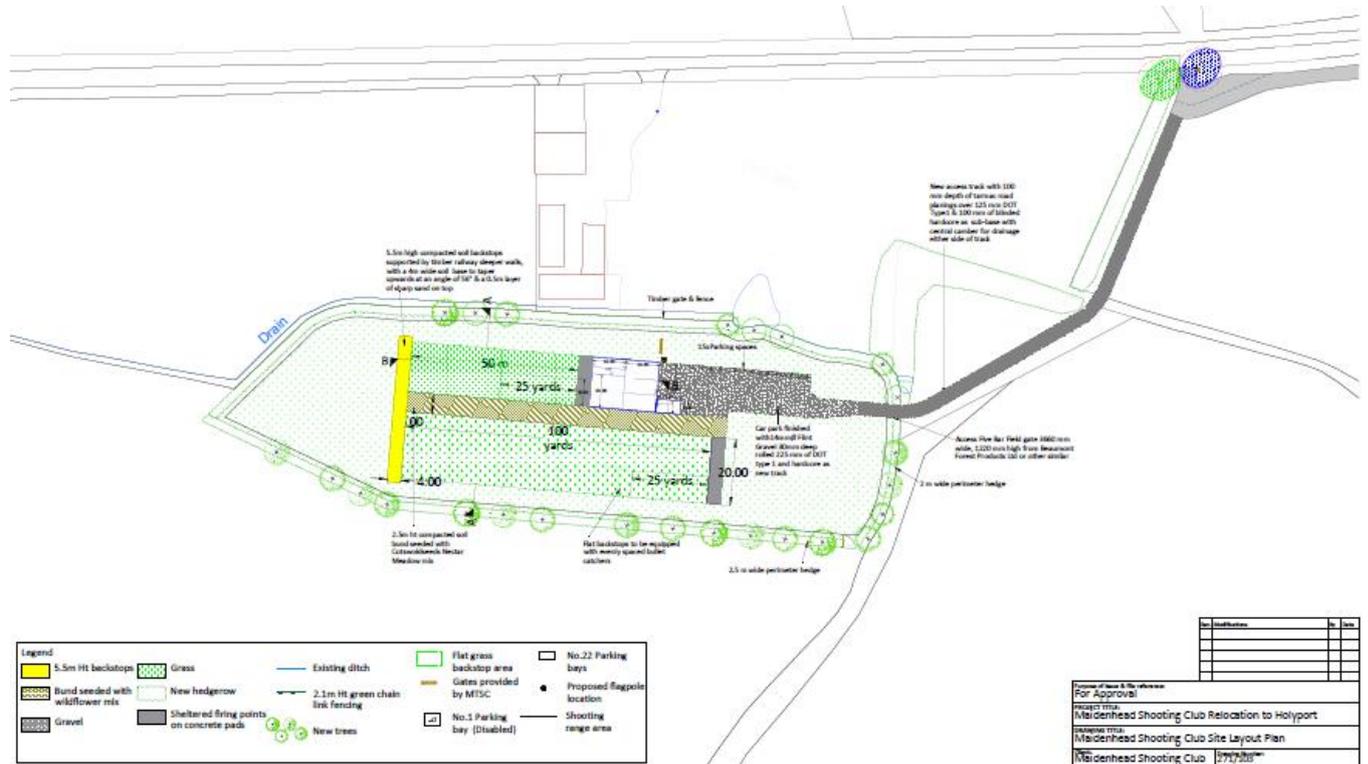
APPENDIX A – SITE LOCATION PLAN



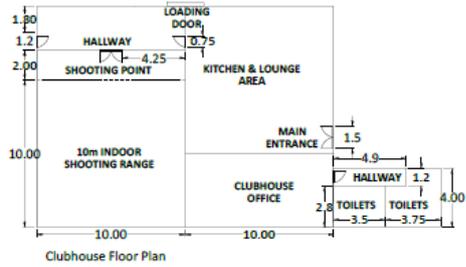
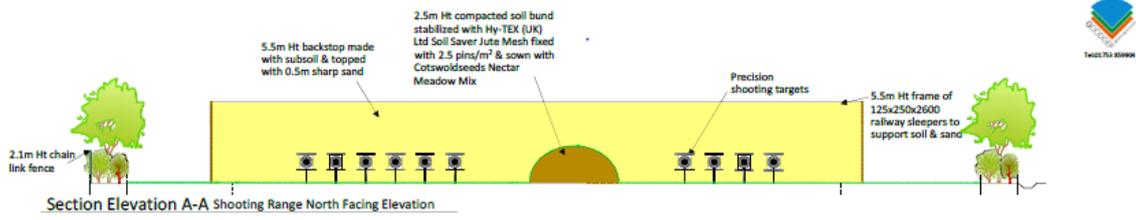
APPENDIX B – LAYOUT PLANS



SITE LAYOUT PLAN

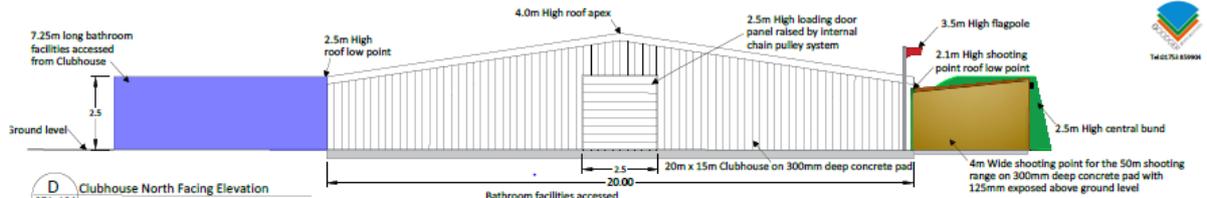


APPENDIX C – ELEVATIONS DRAWINGS

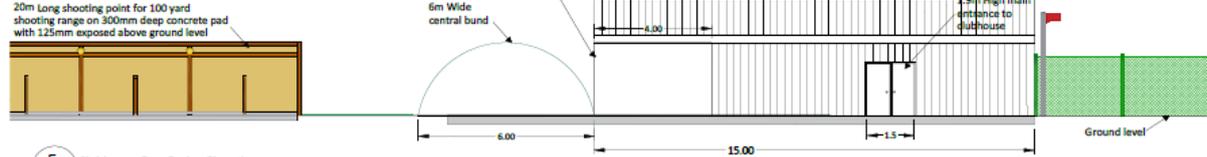


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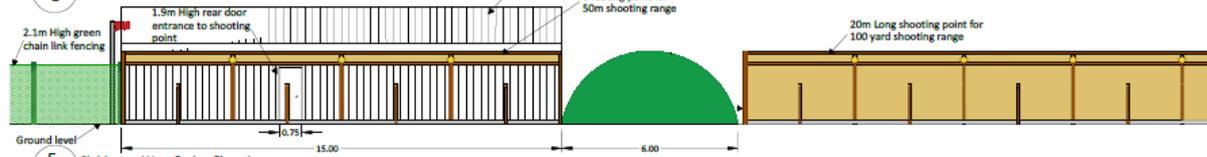
Checked by: [Signature]
 Approved by: [Signature]
 Project Title: Maidenhead Shooting Club Relocation to Holyport
 Drawing Title: Landscape Elevations Set One of Two



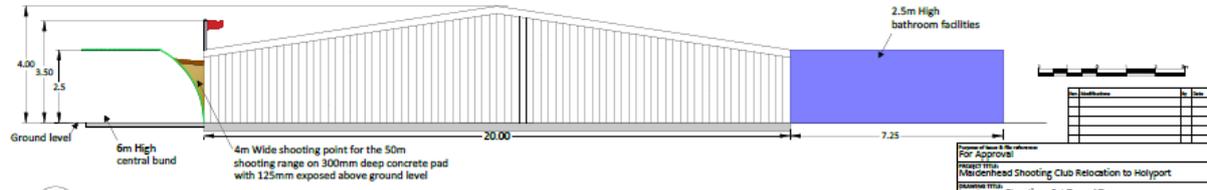
D Clubhouse North Facing Elevation
271_104



E Clubhouse East Facing Elevation
271_104



F Clubhouse West Facing Elevation
271_104

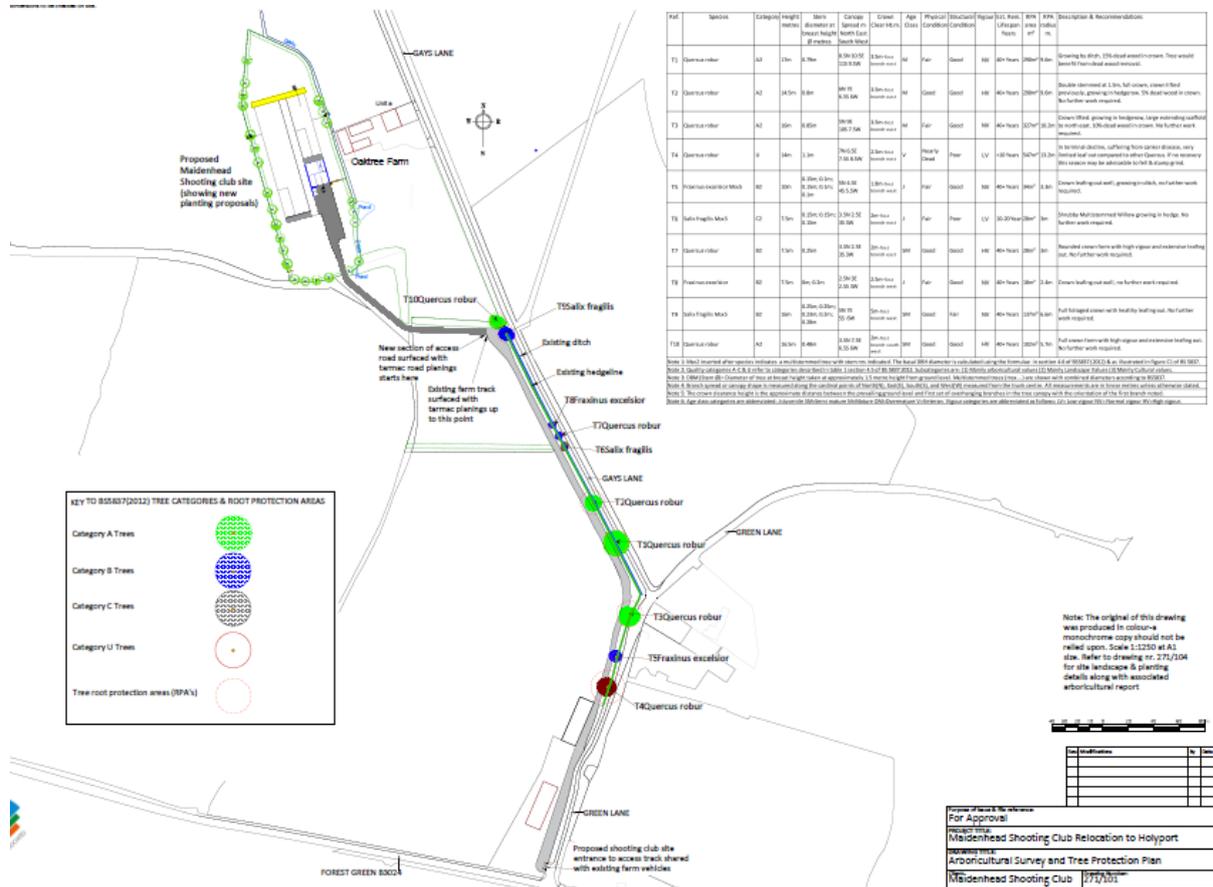


G Shooting Range South Facing Elevation
271_104

| No. | Revisions | Date |
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Prepared by: [Name]
 For Approval: [Name]
 Project Title: Milsenhead Shooting Club Relocation to Holyport
 Drawing Title: Landscape Elevations Set Two of Two
 Date: [Date]
 Project: Milsenhead Shooting Club 2717206

APPENDIX D – TREE SURVEY & PLANTING PLAN



For Approval
 Maidenhead Shooting Club
 Arboricultural Survey and Tree Protection Plan
 Maidenhead Shooting Club 27/1/21

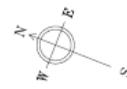
PLANTING PLAN AND SCHEDULE

Planting Schedule

| Trees | | | | | |
|---------|--------------------|----------|------------|----------|----------------|
| Number | Species | Girth | Height | Pot Size | Specification |
| 4 No. | Acer campestre | 3.0-4.0m | Bare root | Feather | :1/3 brks |
| 50 No. | Acer campestre | 1.0-1.2m | Bare root | Whip | -Multi-Stemmed |
| 4 No. | Alnus glutinosa | 3.0-4.0m | Bare root | Feather | :1/3 brks |
| 98 No. | Alnus glutinosa | 1.0-1.2m | Bare root | Whip | |
| 6 No. | Carpinus betulus | 3.0-4.0m | Bare root | Feather | :1/3 brks |
| 172 No. | Crataegus monogyna | 1.0-1.2m | Bare root | Whip | |
| 5 No. | Prunus avium | 3.0-4.0m | Bare root | Whip | :1/3 brks |
| 74 No. | Prunus cerasifera | 1.0-1.2m | Bare root | Whip | |
| 3 No. | Quercus robur | 4.0-5.0m | Rootballed | Feather | :1/3 brks |
| 3 No. | Salix alba | 3.0-3.5m | Bare root | Whip | :1/3 brks |
| 98 No. | Salix caprea | 1.0-1.2m | Bare root | Whip | -Multi-Stemmed |

| Shrubs | | | | | |
|---------|-----------------------|------------------|----------|-----------|----------------------|
| Number | Species | Density | Height | Pot Size | Specification |
| 128 No. | Ilex aquifolium | 1/m ² | 60-90cm | SL | Leader With Laterals |
| 172 No. | Ligustrum ovalifolium | 1/m ² | 80-100cm | SL | Several shoots |
| 59 No. | Rosa spinosissima | 1/m ² | 60-90cm | SL | Several shoots |
| 59 No. | Sambucus nigra | 1/m ² | 80-100cm | Bare Root | Leader With Laterals |
| 136 No. | Viburnum lanata | 1/m ² | 80-100cm | SL | Leader With Laterals |

Note: Bare planting of whips can only take place between Late November and Late February during the dormant season. All whips will be fitted with 900mm tall clear plastic spiral rabbit guards/supporting canes from Tom Tree Ties Ltd & the planting area will be mulched with 60m depth of woodchip or bark mulch



Legend

- 5.5m Pitt backstops
- Grass
- Hard seeded with wildflower mix
- New hedgerow
- Gravel
- New trees

For Approval
 Project Title: Maidenhead Shooting Club Relocation to Holyport
 Drawing Title: Maidenhead Shooting Club Planting Plan and Schedule

APPENDIX E – PHOTOGRAPHS & MAPS

Size of the round

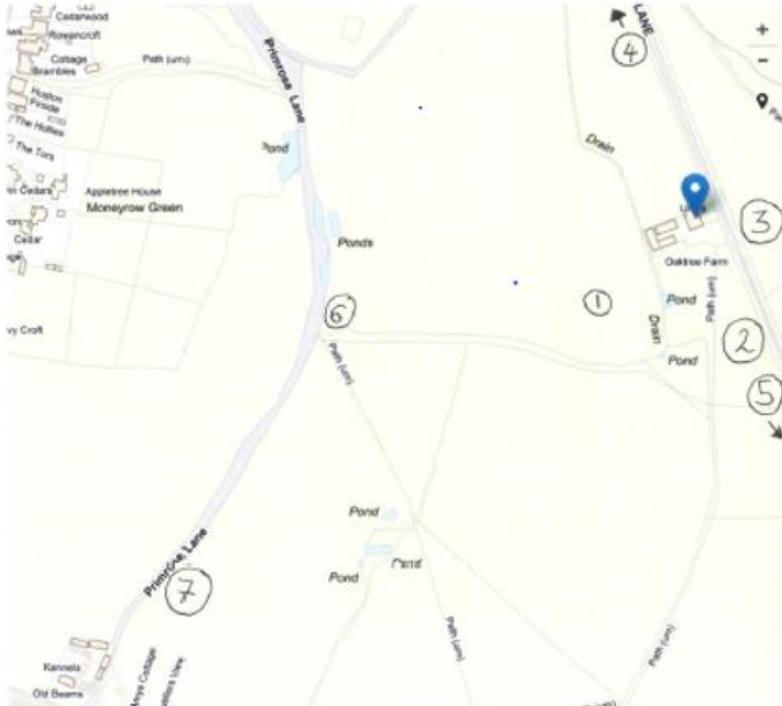


Photo taken during the firing of rounds on the application site

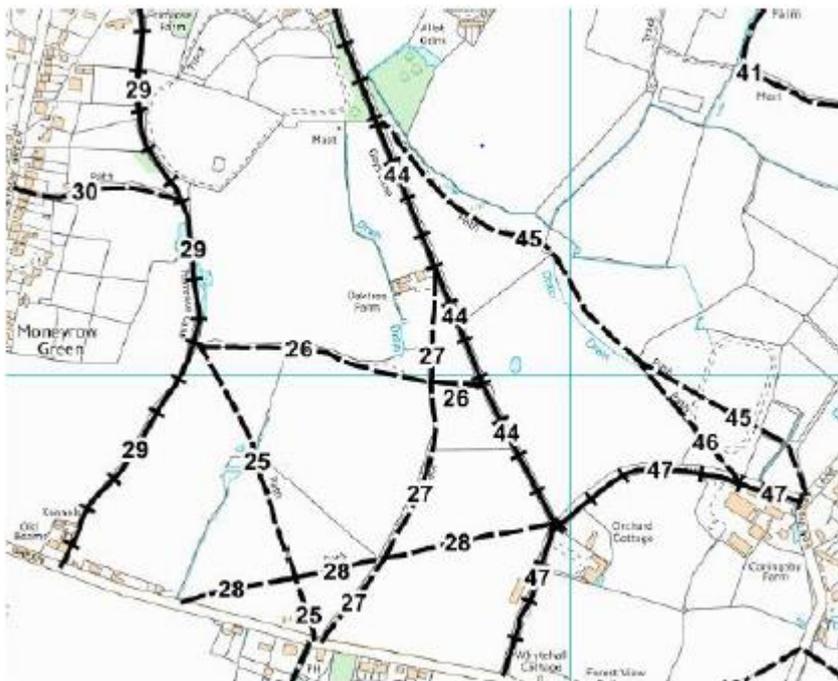


Map showing numbered locations for noise monitoring

Neighbourhood Map



Extract from Public Rights of Way map



Photograph – application site viewed from Public Footpath 26



Site of proposed access road viewed from junction of Footpaths 26 & 27



APPENDIX F – LAYOUT OF FORMER FACILITIES AT BRAYWICK PARK

