

24th January 2023



Assistant Development Manager
Runnymede Borough Council

By email only.

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Dear [REDACTED]

Weybridge Business Park, Addlestone Road, Addlestone, Surrey, KT15 2UP (RU.22/0776)

Following the submission of the revised scheme drawings and accompanying reports in October 2022, a number of consultation responses have been received. At your invitation, this letter seeks to provide a summary of the applicant's response in relation to several points which you have highlighted as requiring further clarification. This letter is being submitted alongside the following documents, which answer the queries in greater detail and should be referred to where necessary.

| Document | Author | Date |
|--|----------------------------------|-------------------------------|
| Technical Note "Further Clarifications for SCC Highways" | Mode Transport Planning (Mode) | 24 th January 2023 |
| Letter "Response to Surrey Wildlife Trust" | MKA Ecology (MKA) | 17 th January 2023 |
| Biodiversity Net Gain Plan & Biodiversity Calculation Tool 3.0 | MKA Ecology (MKA) | 17 th January 2023 |
| Technical Note "Weybridge Business Park" | Air & Acoustic Consultants (AAC) | 19 th January 2023 |

Highways & Parking (Surrey County Council)

Given that SCC have previously provided two separate consultation responses both confirming there is no objection to either scheme design, we were surprised to receive the latest letter dated 19th January. This recognises that at SCC's request, we have previously provided worst case scenario trip generation data using industry standard TRICS, based upon a potential commercial warehousing land use scenario (B8 Use Class). In their letter, SCC now also request equivalent information based upon a parcel distribution land use (a Use which also falls within Class B8).

The requested data is provided at Section 3 of the submitted Technical Note by Mode Transport Planning. It should be noted that, although Units 200 & 210 would likely not be suitable for a parcel distribution occupier, for robustness their floorspace has been included within the assessment. As the Technical Note explains, the TRICS data shows that if all three units were used as parcel distribution hubs, there would still be an overall net reduction in vehicular trips during both the AM & PM peaks when compared to the existing land use.

SCC have also requested a 'worst case scenario' parking accumulation study, based upon the parcel distribution land use scenario. The revised scheme design includes 131 parking spaces which is a policy compliant level of parking for the proposed land uses (based on both SCC and RBC standards). This level of provision also achieves a balance by ensuring that parking is not over-provided to the detriment of the promotion of other sustainable travel modes, which are important policy objectives.

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In the modelled parcel distribution scenario, an additional 27 spaces might be required (for robustness it should be noted that this number also assumes a latent occupancy of 13 spaces at the start of the accumulation exercise for seasonal variation or shift crossovers). Appendix C shows how these 27 spaces could be provided on site, in the event that the entire scheme (all three buildings) are occupied for parcel distribution purposes, however as explained this is unlikely given the design configurations of Units 200 & 210.

Ecology (Surrey Wildlife Trust)

The consultation response from Surrey Wildlife Trust dated 9th December raises no objection to the proposals, but makes a number of suggestions for the Local Planning Authority to consider, and asks for two further clarifications to be provided. The submitted response prepared by MKA Ecology addresses each point made by SWT in response. Additionally, for completeness, and as requested by SWT in their letter, we are providing the actual Biodiversity Metric Calculator 3.0 for review. The SWT comments also query the classification of an area of woodland within the earlier Preliminary Ecological Appraisal (PEA) report. In response, the earlier submitted Biodiversity Net Gain Plan (October 2022), has been updated. This update has marginally reduced the scheme's BNG score from 69% to 63.25%, but regardless this is still a significant BNG score, well in excess of any local or national planning policy requirements.

Environmental Health Officer

The comments received from the Council's EHO dated 7th December 2022 have been reviewed. The Technical Note prepared by AAC responds to these. In summary, it is considered that the AAC response adequately addresses the points raised, and we await confirmation from the EHO that these matters are resolved.

Heritage Assessment & Townscape Visual Impact Assessment

You have asked for a brief comment on the relationship between the above two documents, and the respective conclusions of each. As explained within the original Heritage & Archaeology Statement (April 2022), the purpose of that report is to:

1. *Provide a heritage baseline assessment to understand the archaeological and historic background and development of the Site and the surrounding area;*
2. *Formulate an assessment of the heritage significance of the heritage assets identified as sensitive to the proposed development considering their archaeological, historic, architectural and artistic interests;*
3. *Formulate an assessment of the potential and significance of the archaeology of the Site;*
4. *Formulate an assessment of the impact of the proposed development on the significance of the heritage assets.*

The original Assessment in April 2022 concluded (in relation to the original scheme) that *"due to the nature and extent of the proposed development, the Wey Navigation Conservation Area will be impacted by the proposed warehouse building (Building 100) at the south of the Site. The proposed height and scale of the building would result in a visual change to the wider setting of the conservation area when understood from the east and arriving from the north-east; this would alter the character of the conservation area to a degree which would result in 'less than substantial harm' to the significance of the Wey Navigation Conservation Area."* It went on to describe that this would harm be mitigated, and the amount of harm caused to the Conservation Area would be *"less than substantial"*.

As officers appreciate, where harm is less than substantial it should be weighed against the public benefits of the proposal, including securing an optimum viable use. The updated Heritage Addendum report (October 2022), concluded that as a result of the scheme changes to Unit 100, the amount of harm that was previously considered to arise would now be reduced, with the impact on the significance of the Conservation Area now being categorised as neutral, and the significance and character of the Conservation Area would be preserved. This assessment is supported by the decision of the RBC Conservation Officer who withdrew their objection as a result of the revised scheme proposals.

It should also be recognised by officers that in both Heritage Assessments, there has always been an acknowledgement that the scheme would result in a visual *change* to the Conservation Area, however change does not automatically equal *harm*, and as officers will appreciate that is not the correct policy test.

Whereas, the purpose of the Townscape, Visual Impact Assessment (TVIA), is explained within the document: *“Landscape and Visual Impact Assessment is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and people’s views and visual amenity.”* Furthermore, the assessment of landscape effects, and visual effects, are *“related but very different considerations”*.

Therefore, it is not contradictory for the LVIA to conclude that there would be an *effect* on the landscape, and for the Heritage Assessment to conclude that whilst there would be *change*, this would not automatically be harmful. Unlike the LVIA, the Heritage Assessment is not making an assessment on the degree of change or the significance of that change. Rather, it is making an assessment of the impact of any change upon the *significance* of the designated heritage asset (in this case the River Wey Conservation Area).

Flooding & Drainage

Notwithstanding the likelihood of flooding at the site as described within the Flood Risk Assessment, officers have queried whether the scheme design is flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment. Also, whether the acoustic fencing has been factored into this consideration.

Paragraphs 4.1 to 4.4 of the FRA Addendum should be referred to. The parts of the site potentially affected by flood waters from the Lower Wey are identified on HDR drawing 604/P2 (see Appendix C of the addendum report). The finished floor level of Unit 100 is 540mm above the maximum flood level so building occupants are at negligible risk. There is also safe means of access and egress to the perimeter of the building. There is no flooding to the part of the site occupied by Units 210 and 220.

With regards to the acoustic fence, refer to paragraphs 5.1 to 5.3 of the FRA addendum and drawings 607 and 608 in appendices D and E. Flood waters from the Lower Wey are modelled to enter the site from its north-eastern boundary with Addlestone Road only. The Lower Wey will not overtop along the site’s south-eastern boundary, where the acoustic fence is to be located. As such there will be no interaction between the fence and flood waters.

Vacancy of Existing Buildings

The existing buildings which are located within a Strategic Employment Area have stood empty for many years, making zero contribution to the Runnymede or national economy. According to Companies House records, the existing buildings were last occupied on the following dates:

| Building | Former Tenant | Vacancy Date |
|-----------------|--------------------------------|---------------------------------|
| Bridge House | Shooting Star Chase | 14 th August 2020 |
| Unit 1 | Toshiba Information Systems | 17 th September 2018 |
| Unit 2 | CHEP Palalcon Solutions | 4 th June 2018 |
| Unit 3 | Nexus Planning (Joint Tenant) | 22 nd August 2018 |
| Unit 3 | Broadway Malyan (Joint Tenant) | 14 th August 2019 |
| Units 4, 5, 6 | N/A | N/A |


Units 4, 5, and 6 to the rear of the business park were refurbished in 2017, but despite this investment have never attracted a tenant. None of the buildings have been re-let following the above dates, all prior to the Covid-19 pandemic. This demonstrates that there is no market demand for office accommodation in this location. In these circumstances, planning policy is clear that substantial weight should be given to alternative land uses.

Summary

This letter addresses the recent officer queries which have arisen following the receipt of the latest statutory consultee comments in response to the revised scheme proposals. We trust that the responses given are helpful and resolve the queries posed, however please do not hesitate to get in contact should you require any further information.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Savills".


Associate Director