

Runnymede Borough Council
Development Control
Civic Offices Station Road
Addlestone
Surrey
KT15 2AH

Our ref: WA/2022/129831/02-L01
Your ref: RU.22/0776
Date: 01 March 2023

Dear Sir/Madam

Industrial Redevelopment To Provide X3 Units Within Classes E(G)li (Research And Development), E(G)lii (Industrial Processes), B2 (General Industrial) And B8 (Storage And Distribution) Use, With Ancillary Office Accommodation, New Vehicular Access, Associated External Yard Areas, Hgv And Car Parking, Servicing, External Lighting, Hard And Soft Landscaping, Infrastructure And All Associated Works Following The Demolition Of Existing Buildings

Weybridge Business Park, Addlestone Road, Addlestone, Surrey, KT15 2UP

Thank you for re-consulting us on the above application on 30 September 2022 following the submission of amended plans and thank you for agreeing an additional timeframe for the provision of our comments.

We have reviewed the following documents in regards to our planning remit:

- Flood Risk Assessment and Drainage Strategy Addendum dated October 2022
- Existing flood paths' dated Sept 2022, reference 10334617-HDR-XX-XX-DR-C-607
- Proposed flood paths' dated Sept 2022, reference 10334617-HDR-XX-XX-DR-C-608
- Biodiversity Net Gain Plan for Weybridge Business Park version 2.0, dated 17 January 2023, prepared by MKA Ecology
- Preliminary Ecological Appraisal and Preliminary Roost Assessment for Weybridge Business Park version 3.0, dated 14 October 2022, prepared by MKA Ecology
- General Arrangement Plan Landscape (Dwg No: 8404_100) dated 13 February 2023, prepared by LDA Design
- Ecology Technical Note dated 17 January 2023, prepared by MKA Ecology

Environment Agency position

The additional information does not fully address our earlier concerns. We therefore **maintain our biodiversity objection** set out in our response dated 15 September 2022. We recommend that planning permission should be refused on this basis. The Flood Risk Assessment and Drainage Strategy Addendum satisfactorily addresses our previous flood risk objection (objection 1 in letter ref: WA/2022/129831/01-L01). Therefore, subject to our biodiversity objection being overcome, we have planning conditions we would recommend in regards to flood risk.

Objection 2 – Biodiversity (Buffer Zone)

In accordance with Adopted Policies EE12 and SD7 of the Runneymede 2030 Local Plan and paragraphs 174 and 180 of the National Planning Policy Framework (NPPF), we **object** to the proposed development due to its impacts on nature conservation, there is an inadequate buffer zone to the Addlestone Bourne. We therefore recommend that planning permission is refused.

Reason 2

Buffer zones form a vital part of Green and Blue Infrastructure provision and are required for the following purposes:

1. To provide a wildlife corridor that links a number of habitats and affording species a wider and therefore more robust and sustainable range of linked habitats
2. To allow the watercourse to undergo natural processes of erosion and deposition, and associated changes in alignment and bank profile, without the need for artificial bank protection works and the associated destruction of natural bank habitat.
3. To provide for the terrestrial life stages of aquatic insects, for nesting of water-related bird species, and for bank dwelling small mammals.
4. To allow for the maintenance of a zone of natural character with vegetation that gives rise to a range of conditions of light and shade in the watercourse itself.
5. To allow, where appropriate, for the regrading of banks to a lower and safer profile, in areas where there is public access.
6. To prevent overshadowing of watercourses by buildings.
7. To reduce the risk of accidental pollution from run-off.

This objection is in accordance with paragraphs 174 and 180 of the NPPF which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged. This objection is also supported by Adopted Policy SD7 of the Runneymede 2030 Local Plan, which states that development proposals should protect existing biodiversity and include opportunities to achieve net gains in biodiversity as well as greening of the urban environment.

In addition, Policy EE12: Blue Infrastructure of the Runneymede 2030 Local Plan states; the local planning authority will require applicants to contribute towards the delivery of a high quality multi-functional Blue Infrastructure network by expecting Blue Infrastructure assets to be provided, protected, maintained and enhanced to deliver multiple benefits and services for biodiversity, recreation and landscape. Proposals will be supported that, where appropriate, enable public access to Blue Infrastructure, including through providing undeveloped buffer zones (8m minimum for main rivers and 5m minimum for ordinary water courses). In certain circumstances, these standards could be negotiated

to suit the particular ecological and requirements of a site. Any scheme to provide a buffer zone will need to include a working method statement detailing how the buffer zone will be protected during construction and long-term ecological plan.

Furthermore, the River Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. The development falls within the 'Addlestone Bourne (Mill/Hale to Chertsey Bourne) Water Body' Water Framework Directive water body. We seek to restore and enhance watercourses to a more natural channel wherever possible. The proposed development does not meet the requirements of the Water Framework Directive unless the provisions of Article 4.7 of the Water Framework Directive can be met.

This objection is also supported by section 4.5.16 of the Runnymede Green and Blue Infrastructure Supplementary Planning Document (SPD), dated November 2021, which states: The types of measures that may be considered appropriate as biodiversity gains for helping to aid nature recovery and strengthen ecological connectivity in the Borough include: Enhancement of green corridors in urban areas to aid the dispersal of wildlife (such as green roofs, tree-lined streets, or linear green corridors along rivers, canals, roads and railways).

Overcoming our objection 2

We welcome that a River Condition Assessment has been carried out. However, the excel calculator tool has not been provided with the application. We note that the river has not been classified as Priority Habitat. The Addlestone Bourne is Priority River Habitat, and is a Biodiversity Opportunity Area. The tool should be amended to classify the river as priority habitat and the excel calculator should be provided, which is a matter of public record.

The updated Biodiversity Net Gain Plan dated October 2022 states that significant enhancements to the Addlestone Bourne are not possible. However, in accordance with policy EE12 and the Green and Blue Infrastructure SPD, as a minimum, an 8 metre wide buffer zone to the Addlestone Bourne and removal of invasive species from the channel must be provided.

To overcome our objection, the applicant must submit:

- Proposals to enhance the Addlestone Bourne link channel. The Environment Agency are able to offer guidance on appropriate enhancements to this channel and we would welcome proposals for partnership working.
- An Invasive Species Management Plan which includes removal of invasive species from the river.
- Details of the proposed buffer zone, shown clearly on a map with width measurements provided. If the width is variable across the length of the river, this should be shown clearly. The buffer zone will help to reduce shading, and should be free from all built development including lighting. To reduce light spill into the river corridor outside the buffer zone, all artificial lighting should be directional and focused with cowlings (for more information see Institution of Lighting Professionals 'Guidance Note 08/18 Bats and artificial lighting in the UK'.). The buffer zone should be planted with locally native species of UK genetic provenance and managed appropriately under an agreed scheme. The buffer zone and river corridor could form an essential/valuable part of Green and Blue Infrastructure.
- The Biodiversity Net Gain calculator tool with confirmation of the ecologist's qualifications to carry out a River Condition Assessment.

Please reconsult us on any updated surveys and assessments submitted in connection with this application and any design changes that might subsequently be proposed.

Biodiversity - Advice to applicant and Planning Authority

The proposed development represents an opportunity to enhance the Addlestone Bourne which could help bring the Addlestone Bourne into good ecological status, as required by the Water Framework Directive. The updated Biodiversity Net Gain Plan dated October 2022 states that significant enhancements to the Addlestone Bourne are not possible. We do not agree with this. There are opportunities for significant enhancements along the Addlestone Bourne link channel within the applicant's boundary to improve the borough's Green and Blue Infrastructure, pursuant to local plan policy EE12 and the Green and Blue Infrastructure SPD. As a minimum we require an 8 metre wide buffer zone and removal of invasive species from the channel. Furthermore, we would welcome proposals to improve the morphology of the river, which is overwide and impounded. We would be interested in proposals for partnership working to improve this section of river.

Many sites along the Addlestone Bourne and its tributaries have been redeveloped. When they are, opportunities for enhancement of the river and its adjacent corridor are sought, along with provision and management of a buffer zone. The results add up over time as more lengths of the river are enhanced in terms of wildlife habitat and landscape value, leading to a more connected wildlife corridor. Rivers and the land adjacent to them form an important and effective network of linked habitat corridors to allow the movement of species between suitable habitats, thus promoting the expansion of biodiversity.

Environmental permit - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing [REDACTED]

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Final Comments

Thank you again for consulting us on this application. Our comments are based on the best available data and the information as presented to us. Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me. Please quote our reference number in any future correspondence.

If you are minded to approve this planning application, contrary to our advice please contact us prior to doing so, to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, it is likely we will recommend the inclusion of condition(s) on any subsequent approval.

Yours faithfully

[Redacted]
Planning Advisor

[Redacted]
[Redacted]