

**RUNNYMEDE BOROUGH COUNCIL  
INTERNAL MEMORANDUM  
CONSULTATION ON PLANNING APPLICATION**

My Ref: RU.22/0776 Date: 07/12/2022  
From: [REDACTED] To: RBC Energy Officer

---

Proposal: Industrial redevelopment to provide x3 units within Classes E(g)ii (Research and development), E(g)iii (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.

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

---

**PLEASE RESPOND WITHIN 14 DAYS**

You are notified that the above application has been received and the relevant plans and documents can be viewed on the Council's website under the above reference. You are being formally consulted so that your comments can be taken into account when the application is determined and to support any appeal against a refusal. To assist, please complete the form below by deleting any statements that are not relevant, and adding any additional comments. You are advised that your comments will be published directly to the Council's website.

**Please email the completed form to [planning@runnymede.gov.uk](mailto:planning@runnymede.gov.uk) within 14 days of the date of this consultation even if it is to confirm NO OBJECTIONS. In the absence of a reply within this period, it will be assumed that you have no objections. Please contact the case officer for further information should you require assistance.**

No objection subject to conditions/obligations	Please see comments below.
Comments:	
<b>Policy Observations</b>	
<b>These observations are focussed on the requirements of Policies SD7 and SD8 of the 2030 Local Plan, regarding Sustainable Design and Renewable &amp; Low Carbon Energy respectively.</b>	
Policies SD7 and SD8 support development proposals where they comply with a number of criteria as evidenced in an energy statement. Comments are made drawing on information supplied in the latest Sustainability & Energy Statement ('the Statement') submitted with the application.	
Despite there being no explicit policy requirement for non-residential developments in the Borough to achieve a BREEAM rating, the proposed development seeks to achieve BREEAM 'Excellent' as a means of demonstrating that sustainable design and energy considerations have been comprehensively addressed. The BREEAM New Construction regime is comprised of a series of categories which serve to address the criteria in policies SD7 and SD8, including: secure storage of cycles and storage of waste (in the Transport category); achieving net gains in biodiversity (Land Use and Ecology category); maximising opportunities for passive solar gain and cooling (Energy category); providing EV charging infrastructure (Transport category);	

achieving water efficiency (Water category, despite policy SD7 requirements only relating to residential proposals); sustainable construction principles (Materials and Waste categories); achieving energy efficiency and using renewable energy (Energy category). The design stage BREEAM pre-assessment submitted in Appendix A of the Statement suggests that the proposal is on track to achieve an excellent rating. Should the case officer consider it justified in order to demonstrate compliance with the sustainable construction and energy efficiency requirements of policies SD7 and SD8 of the Local Plan, a planning condition could be attached to any approval requesting a final post-construction certificate be submitted to the Council upon completion/occupation, demonstrating that the Excellent rating has been achieved. This will help ensure that the various measures proposed in the Statement are achieved at later stages of development. Alternatively, individual planning conditions may need to be attached to any approval, for example, to request the proposed Site Waste Management Plan (on p14 of the Statement) is submitted in order to demonstrate compliance with criteria g) of Policy SD7.

Page 16 of the Statement states that cycle storage will be provided, explained in more detail on p25 of the Statement which goes on to explain that the cycle parking will be covered and lit, and that a suitably sized, secure waste area is included within the design - the case officer should be satisfied that this is reflected in the site plans submitted with the application. The proposed measures are considered acceptable.

Page 16 also states that EV charging points will be provided as follows: 10% active and 10% passive provision for staff car parking. However, this does not comply with the standards in Runnymede's Parking Standards SPD, Appendix 3, which reflects SCC's latest EV parking standards. For commercial development, at least 20% of available space is to be fitted with a fast-charge socket (ie. active charging points); and a further 20% with the power supply to provide additional sockets (ie. passive charging points). The SPD also sets out how a minimum of one EV parking space is expected to be provided for disabled users (para 4.20). These standards could be made clear in a planning condition in order to ensure the scheme complies with criteria d) of Policy SD7.

The Statement also demonstrates how the requirements of the new 2021 edition of Building Regulations Part L2A will be met, which came into force in June 2022. Policy SD8 does not seek any additional requirements for non-residential development beyond a Building Regulations compliant scheme, but does require larger developments to supply a minimum of 10% their energy needs from renewable and/or low carbon technologies unless it can be demonstrated with evidence that this is not feasible or viable. Table 1 in the Statement satisfactorily demonstrates that the 10% requirement has been exceeded at this design stage, primarily through the use of air source heat pumps (ASHPs) and solar PVs. The case officer should consider any adverse impacts associated with the use of these technologies, such as noise impacts of ASHPs and visual impacts of roof-mounted solar PVs. The rationale provided in the Statement regarding the suitability and feasibility of incorporating heat networks is also considered to be acceptable.

In conclusion, the proposed energy and sustainability measures are considered to be acceptable in order to achieve the requirements of Policies SD7 and SD8, except for the quantity of EV charging infrastructure which can be secured by condition. It is also recommended that suitable planning conditions be attached to any planning permission in order to ensure that other proposed energy and sustainability measures are achieved, for example through the submission of evidence that the BREEAM Excellent rating has been achieved.

#### **Other issues**

Whilst these observations do not consider sustainable drainage issues, the Statement describes how SuDS proposals (in order to adapt the development to the impacts of climate change) have been calculated to include 20% climate change allowance. It is recommended that the case officer consult with the LLFA and RBC's drainage engineer to confirm if this is an appropriate allowance to apply.

Name of responding officer: [REDACTED]

Date: ...19 December 2022.....