
STATEMENT OF CASE
THE POETS' CORNER RESIDENTS' GROUP

S78 Appeal by Bridge UK Properties 7 LP

**Site Address: Weybridge Business Park, Addlestone Road,
Addlestone, Surrey, KT15 2UP**

Application Reference: RU.22/0776

Appellant's Name: Bridge UK Properties 7 LP

Appeal Reference: APP/Q3630/W/23/3329722

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1.0 Introduction

1.1. This Statement of Case is prepared on behalf of local residents by The Poets' Corner Residents' Group (The PCRG) which is a Rule 6 party in the planning appeal made by Bridge UK Properties 7 LP (the appellant), in respect of a proposed development at Weybridge Business Park, Addlestone Road, Addlestone, KT15 2UP (the appeal site).

1.2. A planning application under reference RU.22/0776 was submitted to Runnymede Borough Council (the Council) and registered on 23rd May 2022, this application was subsequently amended on 2nd November 2022. The development proposed in the amended application and forming the subject of this appeal comprises:

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.

1.3. This is herein referred to as the "Appeal Scheme".

1.4. The revised application was refused permission by the Council's planning committee. The committee recorded a named vote and the decision to refuse was unanimous. The Council identified three reasons for refusal. The decision notice is dated 24th March 2023. The reasons for refusal cited on the decision notice are as follows:

- 1. The proposed 'Building 100' by reason of its position, form, scale, mass and significant bulk would result in an overtly prominent, dominant and visually overbearing form of development which would have a detrimental impact to the character and appearance of the area. This is contrary to Policy EE1 of the Runnymede 2030 Local Plan (2020), Runnymede Design Guide (2021), the National Planning Policy Framework (2021) and the National Design Guide (2019).*
- 2. The proposed use would result in a loss of residential amenity to surrounding residential properties. This loss of amenity would be due to noise and disturbance from both the on-site operations as well as disturbance from the likely significant numbers of comings and goings of large goods vehicles that the proposed uses would attract, particularly at*

anti-social hours of the day and night. This is contrary to Policy EE2 of the Runnymede 2030 Local Plan (2020), the National Planning Policy Framework (2021) and the associated National Planning Policy Guidance relating to Noise and disturbance.

3. *In the absence of a completed legal agreement the proposed development has failed to secure the provision of the necessary infrastructure needed to make this development acceptable in planning terms. The proposed development is therefore contrary to policies SD3, SD4, SD5 and EE9 of the Runnymede 2030 Local Plan (2020) and the National Planning Policy Framework (2021) and its associated guidance.*

1.5. The evidence will seek to address these reasons for refusal.

2.0 The PCRG Campaign

2.1. The PCRG was formed in response to the application due to the significant concerns of residents and the wider community. The level of public engagement by the applicant, when balanced against the size and impact of the proposed development, was perceived by many to be inadequate. Therefore, the PCRG aimed to provide information to the local community, liaise with the local planning authority and challenge data submitted by the applicant. The PCRG communicated through information leaflets, public meetings, its website, thepcrg.com and social media.

2.2. A petition¹ was started by the group against the planning application in May 2022 –signed by 616 respondents.

2.3. Throughout the application consideration period the group carefully analysed the application and supporting documents for the original and revised applications, engaged with councillors and different sections of the community and worked to ensure access to information contained within the planning application submission was accessible to all sections of the local community.

2.4. As transport emerged as a key concern from the majority of residents the group through funds raised by the community commissioned a peer review of the transport assessment by SW Transport Consultants dated 31st May 2022.

¹ (Change.org, 2022)

- 2.5. The group's nominated spokesperson represented the objections of residents at the planning committee hearing on 22nd March 2023.
- 2.6. After the refusal the appellant contacted the group to initiate discussions based on the new application, this took place alongside the appellants pre-planning meetings with the RPA.
- 2.7. The PCRG participated in these preliminary discussions with the appellant in good faith in order to constructively participate in future plans for the site, however the perception of the group was that the appellant had already progressed the new plans and was not open to amending the revised plans to take into account any of the community views, even where suggestions were of a relatively minor nature.
- 2.8. When the revised application was brought to committee on 25th October 2023, once again, the PCRG's spokesperson represented the community in presenting the objection to the new application, RU.23/1066 which was subsequently approved with conditions.

3.0 Site and Surroundings

- 3.1. The appeal site comprises two separate plots located to the north and south of Addlestone Road, the northern plot is bordered by the River Bourne in the south, and the northern most strip of this plot is designated green belt and is subject to an Article 4 direction, the southern site is adjacent to the River Wey Navigation, a designated conservation area and site of nature conservation importance in the green belt to the east. The appeal site is part of a biodiversity opportunity area.
- 3.2. Addlestone Road runs from the roundabout junction with Link Road in the west to the 'old' Wey Bridge, located at the junction with Bridge Road in the east. Addlestone Road is a narrow single carriageway which runs in between the River Wey and River Bourne, beyond the appeal site the road narrows to under 5m wide, which appears even narrower in summer months due to the hedgerow that borders the river. The 'old' Wey Bridge currently has a width restriction of 7 feet and weight restriction of 7.5 tonnes. There is a narrow pedestrian path on the north side of Addlestone road, again this becomes overgrown in the summer due to hedgerow growth so is very narrow capable of only single-file pedestrian use and an unmade track on the riverbank on the south side of Addlestone Road.
 - 3.2.1. Aside from the restricted egress from Addlestone Road over the bridge the only other access/egress from Addlestone Road to the east of the appeal site is via

Weystone Road the entrance to this road is via a small bridge over the river Bourne which is c3.5m wide.

3.2.2. Addlestone Road runs parallel with the A317, Weybridge Road and during peak hours is used as a cut through for traffic, becoming congested with traffic frequently queuing from the traffic lights on the 'old' Wey Bridge back as far as the junction of Addlestone Road and Hamm Moor Lane.

3.3. The northern plot comprises one office building currently designated as B1 office use.

3.4. The southern plot is also designated as B1 use and comprises six office buildings, the newest three of these were built c2016, (planning application RU.15/0798) and have not been occupied since being first built. The two plots combined form 'Weybridge Business Park' the site has not been fully occupied for a number of years, the most recently used building was Bridge House, occupied by Shooting Star Children's Hospices until 2020.

3.5. Until acquired by the appellant the predecessor in title maintained the business park in excellent condition including the maintenance of the grounds, unfortunately since the acquisition the development has not been maintained and has become overgrown and untidy.

4.0 Planning Policy

4.1. The following planning policy and guidance will be referred to in the course of the Appeal:

4.2. National Planning Policy Framework and Guidance

The National Planning Policy Framework (the Framework) was first published on 27th March 2012 and has subsequently been updated, most recently in September 2023, after the determination of the application at this appeal. The Framework is a material consideration in planning decisions and sets out the Governments planning policies for England and how these should be applied. It also provides a Framework within which locally prepared plans for housing and other development can be produced. At the heart of the NPPF is a presumption in favour of sustainable development. The document, as a whole, forms a key and material consideration in the determination of any planning permission.

The supporting National Planning Policy Guidance (NPPG) is also a material consideration for decision making, as is the National Design Guide (2019) and the Nationally Described Space

Standards (2015). Other material considerations include the Runnymede Strategic Flood Risk Assessment (2018).

4.3. The Development Plan

The Development Plan for the Borough of Runnymede comprises the Runnymede 2030 Local Plan as adopted on the 16 July 2020.

The Runnymede 2030 Local Plan sets out the key planning policies which determine the location, scale and timing of new development in the Borough in the period up to 2030, including the spatial development strategy, allocations for housing, employment and retail development and protection of the environment. The Local Plan also contains a suite of planning policies against which planning applications in the Borough will be determined. The current Local Plan policies are considered up to date.

Local Plan policies relevant to this appeal include the following:

4.4. Runnymede 2030 Local Plan

- SD1 (Spatial Development Strategy)
- SD2 (Site Allocations)
- SD3 (Active & Sustainable Travel)
- SD4 (Highway Design Considerations)
- SD5 (Infrastructure Provision & Timing)
- SD7 (Sustainable Development)
- SD8 (Renewable & Low Carbon Energy)
- SL1 (Health and Wellbeing)
- EE1 (Townscape and Landscape Policy)
- EE2 (Environmental Protection)
- EE9 (Biodiversity, Geodiversity and Nature Conservation)
- EE11 (Green Infrastructure)
- EE13 (Managing Flood Risk)

- IE2 (Strategic Employment Areas)
- IE3 (Catering for modern business needs)

Copies of these policies have been provided to the Planning Inspectorate by the Council as part of their appeal questionnaire.

4.5. Supplementary Planning Guidance and Documents

The evidence will also give due consideration to the following as a material consideration in the decision-making process:

- Runnymede Borough Parking Guidance (2022)
- Runnymede Design Supplementary Planning Document (2021)
- Green and Blue Infrastructure Supplementary Planning Document (2021)
- Infrastructure Delivery and Prioritisation (2020)
- Parking Strategy: Surrey Transport Plan (2020)

All of the above documents have been provided to the Inspector by the Council.

5.0 The Case on behalf of the PCRG

5.1. The case for the PCRG will address the reasons for refusal as set out in the Council's decision notice, and as follows:

Reason for Refusal 1: Overbearing form of development and detrimental impact upon the character and appearance of the area

5.2. The PCRG evidence will demonstrate that the proposed development is out of keeping with the character and appearance of the local area, including the remainder of the Business Park and the Wey Navigation, including the Conservation Area. As a result the proposals will lead to a significant and detrimental impact to the character and appearance of the area and hence falls contrary to the NPPF (2023), National Design Guide (2019) and Policies EE1 and SL6 of the adopted Local Plan and the Runnymede Design Guidance

Reason for Refusal 2: Noise, disturbance and Impact upon residential amenity

- 5.3. The PCRG have fundamental concerns as to the 24/7 hours of operation proposed by the appellant. The PCRG's case will evidence that the form of development proposed, including the range of uses, the proposed 24 hours a day 7 days a week operation of the facilities, the associated vehicle movements, and the levels of activity associated with the proposals will have a significant and detrimental impact upon residential amenity, particularly (but not exclusively) in the context of the NPPF National Planning Policy Guidance and Policy EE2 of the adopted Local Plan.
- 5.4. The evidence will seek to demonstrate that the Appellant's evidence submitted at the time of the application is not robust or representative.
- 5.5. Reference will be made to research and advice provided on behalf of the PCRG by an appointed Transport Consultant. Supporting evidence may also be provided by an independent acoustician. The evidence will demonstrate that the mitigation proposed would be insufficient in addressing the level of impact generated by the proposals.

Further Matters for Consideration

- 5.6. The PCRG will also seek to demonstrate that the traffic generation arising from the proposed development is wholly unacceptable in this location. The evidence will contend that the Appellant's traffic data is not robust and does not provide a realistic picture of the true position.
- 5.7. The PCRG will also contend that there is no need for this type of provision in this location and that there are other suitable alternative sites in more appropriate locations that would suit this demand. The evidence will demonstrate, in the context of the NPPF (2023) and adopted Local Plan Policy IE3, that the proposed development will have a harmful impact upon existing businesses in the local area.

6.0 Conclusion

- 6.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The PCRG considers that the proposed development falls contrary to the NPPF and the adopted Development Plan. The material considerations are not considered to outweigh the Development Plan policies in this instance. It will therefore be requested that the Inspector dismisses this Appeal.

7.0 List of Documents and Other Information

7.1. The following documents may be referred to in the preparation of evidence and at the Inquiry:

- The National Planning Policy Framework (2023)
- National Planning Policy Guidance
- National Design Guide (2019)
- Nationally Described Space Standards (2015)
- Runnymede 2030 Local Plan (2020)
- Runnymede Borough Parking Guidance (2022)
- Runnymede Design Supplementary Planning Document (2021)
- Green and Blue Infrastructure Supplementary Planning Document (2021)
- Runnymede Strategic Flood Risk Assessment (2018)
- Infrastructure Delivery and Prioritisation (2020)
- Parking Strategy: Surrey Transport Plan (2020)
- Runnymede Brownfield Land Register (2022)
- Runnymede Annual Monitoring Report (2021-22)

7.2. The PCRG reserves the right to add to these documents as appropriate.

7.3. Witnesses may be called to provide evidence on the following matters:

- Planning
- Transportation and Highways
- Noise
- Design and conservation