SW Transport Planning Ltd

Weybridge Business Park, Addlestone, KT15 2UP Planning Application for 3 Industrial Units LPA Ref: RU/22/0776

Objection on Transport and Highway Grounds

Poets Corner Residents Group

May 2022



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1. Introduction

- 1.1.1 This report has been prepared on behalf of local residents living in the vicinity of the site and considers the highway and transport aspects of the proposed redevelopment of land at Weybridge Business Park, to provide three new commercial buildings for a mix of industrial uses; research and development; and storage or distribution operations.
- 1.1.2 The application is supported by a Transport Assessment (the TA) prepared by mode transport planning (mode), dated 22 April 2022 and other transport related documents including a Framework Travel Plan (FTP), Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP).
- 1.1.3 A detailed review of the documents has been carried out and the findings are set out in this report. Based on this review, it is concluded that the applicant has failed to provide sufficient information or analysis to enable the impacts of the proposed development to be assessed. Furthermore, errors in the TA mean that the traffic generation from the proposals has been significantly underestimated.
- 1.1.4 The following sections of this report contain an appraisal of the applicants' supporting documents. The errors and omissions in these reports and the flawed approach to the analysis process mean there is no objective basis on which to assess the true impacts of the development or whether such impacts can be adequately mitigated.

2. Transport Analysis and Impacts

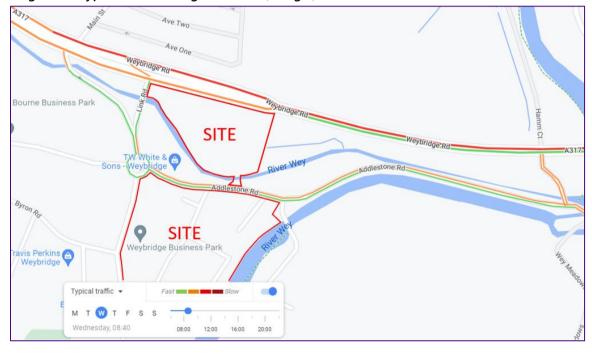
2.1 Overview of Submitted Transport Assessment

- 2.1.1 The applicants' TA provides an overview of baseline transport conditions, sustainable travel options and trip generation but fails to provide any network traffic or pedestrian flow data or traffic forecasts, with and without development. It is therefore not possible to assess the highway impacts of the development. The TA simply compares traffic generation forecasts for the former office land use versus the proposed industrial land use, arguing that the proposals will lead to a net reduction in traffic generation. Having reached that conclusion, no further analysis is included.
- 2.1.2 The comparison with the former office use is flawed for two reasons. Firstly, the site has been vacant for several years and generates no traffic. Secondly, there is no realistic prospect for large scale office use returning to the site. The Planning Statement submitted with the application (Savills) describes the site as "long-vacant office floorspace" and the Market Assessment report (Savills) makes clear that market demand favours large scale industrial and logistics premises. If there were any realistic demand for office space it would be in the site owners' interests to re-let the current buildings rather than incur demolition and redevelopment costs.
- 2.1.3 In view of the above, it is only possible to assess the true impacts of the proposals by undertaking a full analysis of trip generation relative to the current vacant use of the site. No such analysis has been provided.
- 2.1.4 The following paragraphs examine the applicants' TA in more detail. Section 3 of this report considers other transport matters and contains a review other transport related documents submitted with the planning application.

2.2 Existing Conditions

- 2.2.1 Chapter 3 of the mode TA describes existing transport conditions including a description of the local highway network. However, there is no information on existing traffic flows, the composition of traffic (e.g. HGV numbers) or pedestrian/cycle movements on the routes likely to be used by development traffic.
- 2.2.2 The A317 Weybridge Road corridor and Link Road traffic signals are acknowledged congestion hot-spots with slow moving and queuing traffic, in both directions, during peak periods.

2.2.3 The congestion problems on Weybridge Road result in traffic being displaced onto Addlestone Road, leading to further congestion on this route. This (and the congestion on the A317) is illustrated in the Google traffic information in Figures 1 and 2 below:









- 2.2.4 The applicants' TA fails to acknowledge or quantify these problems, or include any analysis of the impacts from traffic generated by the development. The potential traffic impacts of the development are considered further in section 2.4.
- 2.2.5 It should also be noted that Addlestone Road is route used by many pupils attending Heathside School (to the east of the site) and St George's College (to the northwest of the site). Both schools cater for pupils aged 11 - 18 years. Children from Addlestone use the route through the business park and Addlestone Road for access to Heathside School and Weybridge based children use Addlestone Road for access to St George's. Currently there are no definitive records of pedestrian or cycle flows, but estimates from local residents indicate that at least 100 pupils utilise Addlestone Road for school journeys twice per day.
- 2.2.6 With regard to accident statistics, the mode TA provides details of Personal Injury Collisions (PIC) from the Crashmap UK database and shows 4 accidents in the vicinity of the site during the period from 2016 to 2021. However, the information presented is incomplete as two further accidents have occurred identified with reference numbers shown in red font in Figure 3.

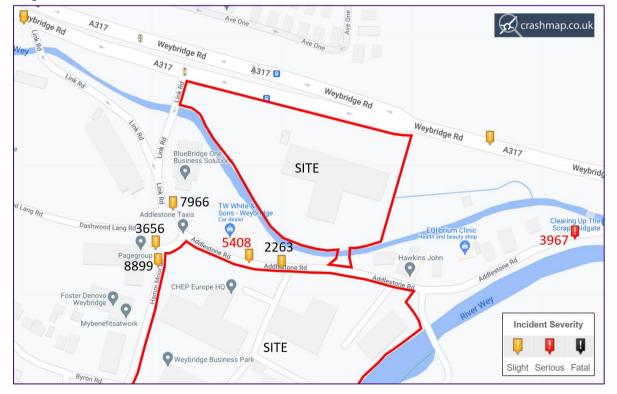


Figure 3 – Accident Data

- 2.2.7 The two additional accidents include one categorised as 'slight' on Addlestone Road, close to the southern site access (Ref No 5408) which occurred on Tuesday 19 January 2021 at 12.27pm. Unfortunately, the Crashmap database currently only shows 'Provisional Data' for this accident and details of vehicle and casualty information are unavailable. A further, serious, accident took place on Addlestone Road approximately 150m east of the site (Ref No 3967) on Wednesday 24 April 2019 at 7.35am, when a van collided with a pedal cyclist resulting in serious injury to the rider.
- 2.2.8 The accident history relates to a period with little or no traffic being generated by the site. The absence of baseline traffic data and future year forecasts, including pedestrian and cyclist flows, makes it impossible to fully assess the road safety impacts, particularly for vulnerable users including pedestrians and cyclists. The attraction of large articulated lorries (Unit 100) and large rigid HGV's (Units 210 and 220) represents an increased risk to pedestrians and cyclists, but has not been addressed in the TA.

2.3 Transport Policy Considerations

2.3.1 The problems of coping with traffic congestion and transport infrastructure issues are acknowledged in the Adopted Runnymede 2030 Local Plan at paragraph 5.42 which states:

"The Council also recognises that there are a number of existing transport and infrastructure issues within the Borough and beyond including:

- Congestion on a key transport route through the Borough, the A320, and a number of other 'congestion hotspots' including the M25 and A317;
- Infrequent and limited bus services during peak hours and limited connectivity by walking/cycling routes in some areas;
- Level crossing barrier down times in the Addlestone and Egham areas in particular causing significant delays and queuing on the surrounding highway network"
- 2.3.2 In view of these problems paragraph 5.49 of the Local Plan recognises that some form of intervention will be needed to ensure that congestion can be managed, stating:

"Where congestion hotspots have been identified, either arising from or made worse as a result of proposed development, mitigation measures will either be provided in their entirety by developers or funded by developer contributions and grant funding, and development phased to ensure mitigation occurs prior to or alongside development proposals".

2.3.3 The requirement to properly assess and mitigate the impacts of development, through the use of Transport Assessments, is set out in Policy SD4 of the Local Plan "Highway Design Considerations" which requires that the Transport Assessment:

"considers the impact of the proposal on the highway network and identifies the measures to mitigate impacts to acceptable levels".

2.3.4 The applicants' TA fails to do this and therefore conflicts with Policy DS4.

2.4 Development Proposals

- 2.4.1 Chapter 5 of the TA describes the development proposals noting a total proposed gross internal floor area (GIA) of 17,820m² broken down as follows.
 - Unit 100 14,752m²
 - Unit 210 1,407m²
 - Unit 220 1,660m²
- 2.4.2 An extract from the proposed site layout drawing (UMC Architects Drg. 21490-UMC-ZZZZ-SI-DR-A-0602 F) is shown in Figure 4 (next page) and illustrates the nature of the proposed buildings.



Figure 4 – Proposed Site Layout

- 2.4.3 The proposed development is speculative, with no end-users identified at this stage. However, Unit 100 is clearly identifiable as a large scale storage and distribution facility, consistent with the demand set out in the applicants' Market Assessment report. This unit constitutes 83% of the total development floorspace.
- 2.4.4 The vehicle tracking drawings for this Unit (in Appendix D of the mode TA) indicate its intended use by 16.5m long articulated HGVs. The provision of 10 dock loading doors and parking/queuing capacity for an additional 12 articulated vehicles indicates the potential for an intensive B8 land use for this Unit.
- 2.4.5 Units 210 and 220 have been designed to accommodate 10m long rigid body HGVs. These two units comprise 8% and 9% of the total proposed development floorspace. The site layout and vehicle tracking drawings show five loading bays with parking/queuing capacity for a further two HGVs indicating that these buildings could also be used for storage or distribution, as well as other potential industrial or research and development uses.

2.4.6 This suggests that the proposals are designed primarily for B8 (storage and/or distribution) land uses, with between 83% and 100% of the proposed units suitable for this activity. The alternative B2, E(g)(ii) and E(g)(iii) land uses (industrial, research and development) make up only 0% to 17% of the proposed floorspace. This has implications for the composition of traffic generated by the units, with a likelihood of a significant proportion of HGVs relative to cars and light vehicles. This characteristic has not been reflected in the traffic generation and modal share analysis in the TA.

2.5 Trip Generation Assessment and Traffic Impacts

- 2.5.1 Chapter 6 of the TA sets out estimates of trip generation for both the former office use and proposed redevelopment for industrial uses. For the reasons set out in Section 2.1 of this report, any comparisons with the former, redundant use of the site are not relevant as there is no realistic prospect of the site returning to full use as offices.
- 2.5.2 For the proposed development trip generation, the mode TA relies on trip generation rates derived from the 'Industrial Estate' land use category within the TRICS database. Paragraph 6.3.3 and Table 6.2 of the TA confirm that the selected TRICS site reflect a 'broad mix' of use classes with the following land-use split:
 - B1 (Business) 13%
 - B2 (General Industrial) 32%
 - B8 (Storage or Distribution) 55%
- 2.5.3 It can be seen that the above land-use split is a poor match for the proposed development, which is likely to comprise a minimum of 83% B8 uses.
- 2.5.4 The use of the TRICS database requires careful selection of sites to ensure they are comparable in type, scale and location. The current site selection in the mode TA does not provide this. Given the nature and scale of Unit 100 it is likely that the development will generate significantly higher levels of HGV traffic than predicted in the TA; and in the absence of any restrictions on operating hours, the development has the potential to generate over such HGV traffic over a 24 hour period.

- 2.5.5 Table 6.4 of the TA estimates that the proposed development will generate only 4 HGV movements in the AM peak an only 1 in the PM peak. However, as set out above, given the scale and nature of Unit 100 alone, this seems highly improbable. With 10 loading bays and waiting capacity for a further 12 HGVs, it would be possible for the loading bays to be in continual use. Each bay could potentially accommodate 2 HGVs per hour (allowing 30mins to service each vehicle). This would result in up to 4 HGV movements per hour per loading bay, resulting in a total HGV trip generation of 40 HGV movements per hour, for Unit 100 alone. This excludes light vehicle traffic generated by staff and visitors using the 120 space car park at Unit 100 and excludes trip generation from Units 210 and 220. It is therefore evident that the trip generation forecasts in the TA do not reflect the nature of the proposed development and are significantly underestimated.
- 2.5.6 Given the prevailing traffic congestion problems on the A317, at the Link Road Traffic signals and along Addlestone Road, as described in Section 2.2, it is clear that the proposed development will add to these problems. The potential for high numbers of articulated lorries and other HGVs to be generated by the development is a particular concern as such vehicles, by virtue of their size, will have a disproportionate adverse impact on traffic flows. This requires further analysis by the applicant, particularly the implications for queuing capacity at the Link Road traffic signal junction, as each large HGV will consume the same amount of queuing space as three cars. Without this information to true impacts of the development cannot be assessed.
- 2.5.7 A further consideration is that there is no provision for vehicles leaving the Weybridge and Bourne Business Parks area to turn right onto the A317 Weybridge Road. This is because the outbound section of Link Road connects with the westbound section of the dual carriageway, where only left turns are permitted. This means that all vehicles with destinations to the east of the site are required to perform a U-Turn at the Weybridge Road (A317)/Station Road (B3121) roundabout. The increased turning movements at the roundabout, particularly by HGVs, will have implications for the capacity and operation of the roundabout but no consideration has been given to these impacts.
- 2.5.8 Addlestone Road would be the obvious access route to and from work for staff living in Weybridge, including those choosing to drive. No consideration has been given by the applicant to the impact of these additional work trips on this already congested route.
- 2.5.9 A further omission in the TA is that it only considers conventional peak hours of 08.00 to 09.00 and 17.00 to 18.00, whereas the development will generate traffic throughout the daytime, evening and potentially on a 24 hour basis. The worst case impacts of the development, particularly in terms of conflicts between HGVs and vulnerable road users, are likely to occur at other time periods, including the periods around the start and end of the school day. No analysis of these impacts has been provided.

2.5.10 Notwithstanding the above comments, there is also a major error in the trip generation calculations presented in Table 6.3 of the TA. The 'Vehicle Trips' figures shown in the table have been calculated incorrectly and do not match the stated floor area and 'Vehicular Trip Rates'. A copy of table 6.3 with the mathematical error corrected is shown below.

Industrial Estate		AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
		Arrivals	Departures	Two Way	Arrivals	Departures	Two Way
All Units –	Vehicular Trip Rate	0.379	0.143	0.522	0.168	0.426	0.594
17,820sqm	Vehicular Trips	28 68	×	31 93	1 30	23 76	30 106

Table 6.3 AM and PM Peak Vehicular Trip Generation (Proposed Development 17,820m²)

- 2.5.11 This shows that the AM peak estimates are 2.5 times higher than claimed in the TA and the PM peak figures are 3.5 time greater.
- 2.5.12 This error is then carried forward to calculation of 'Net Change in Vehicle Trips' in Table 6.5 of the TA. It also carries through to the Planning Statement (Savills) and potentially to the Noise Assessment report and Air Quality Assessment report (prepared by Air & Acoustics Consultants), although the latter reports appear to be based on daily traffic forecasts, which are not explained and cannot be verified.

2.6 Parking Provision and Parking Accumulation

- 2.6.1 Section 5.5 of the applicants' TA deals with car parking provision stating that the proposed development will include a total of 180 car parking spaces (120 spaces for Unit 100 and 60 spaces for Units 210 and 220).
- 2.6.2 The TA quotes Surrey County Council maximum parking standards of 1 car space per 100m² for B8 uses and 1 per 30m² for B2. Applying the B8 rate to Unit 100 would give a maximum requirement of 148 spaces for that unit. Applying the B2 rate to Units 210 and 220 would give a combined maximum requirement for 102 spaces for the two units. Hence the total number of spaces needed for the whole development, based on SCC maximum standards, is 250 spaces.
- 2.6.3 The proposed provision of 180 spaces falls well below the Surrey guidance and could indicate a risk of under provision, leading to displacement of parking off-site.

2.6.4 The TA seeks to justify the under provision by including an analysis of parking accumulation; which is set out in Table 5.2 of the TA and shows a maximum parking space occupancy of 84%. However, this has been based on the inappropriate "Industrial Estate" trip generation rates which, for the reasons set out earlier, are considered unrepresentative of the proposed development. Also, the analysis has been carried out as an average across the whole site, notwithstanding the different characteristics of the 3 Units. As such, the parking accumulation analysis provides no assurance that the levels of parking at each of the individual Units are adequate.

3. Other Transport Considerations

3.1 Delivery and Servicing Plan

- 3.1.1 The Delivery and Servicing Plan (DSP) prepared by mode transport planning focuses primarily on the movement of service vehicles at the site access points and within the development parcels. The vehicle swept path tracking drawings from the TA are referenced in the DSP and reproduced in its appendices. The document purports to include a "Servicing Strategy" but no information is provided on the numbers or timings of deliveries, or how they will be managed, other than to state that "A member of staff will be appointed to oversee the management, development and monitoring of the DSP".
- 3.1.2 Vehicle routing plans are included, showing the route from the site to the motorway network but there is no indication of how the use of this routing would be controlled or enforced. Inevitably a proportion of servicing and delivery vehicles would have local origins and destinations, requiring the use of alternative routes but the DSP gives no consideration to this.
- 3.1.3 The absence of any assessment of service vehicle numbers, vehicle types, operating hours, delivery times or lorry routing controls, means it is not possible to assess the impacts of these movements on the local road network or other users of the public highway.

3.2 Construction Logistics Plan

- 3.2.1 The Construction Logistics Plan (CLP) prepared by mode transport planning states that the appointed contractor for the construction works would be required to comply with the Considerate Contractors Scheme but provides no quantifiable information about the construction process, other than suggested working hours.
- 3.2.2 There is no information about the likely duration of the works, no description of the construction methodology, no estimates of quantities of materials to be brought to or removed from the site, the programming of these operations or their management. Nor are there any estimates of vehicle types or numbers or details about how construction staff will travel to the site or where parking will be provided. Additionally, there is no indication of where site compounds will be established or how construction vehicles will access the site(s).
- 3.2.3 This basic level of information should be provided within a CLP at the planning application stage so that the impacts of the construction process can be assessed; recognising of course that the Plan would need to be developed and more detail added by the appointed contractor prior to construction. The current CLP fails to provide this information or any details of how the operation of the local road network will be impacted or how the safety of other highway users will be protected.

3.3 Framework Travel Plan

- 3.3.1 The Framework Travel Plan (FTP) by mode transport planning describes the sites' accessibility by a range of travel modes but includes no estimates of baseline trip generation or any forecasts for future years taking account of Travel Plan measures.
- 3.3.2 Although no end-users of the buildings are identified at this stage, the FTP should, as a minimum, set out baseline trip generation and modal share information. It should also contain initial targets for increasing travel by sustainable modes and an action plan for achieving the targets.
- 3.3.3 The absence of this information means that the FTP, as currently drafted, fails to comply with any current good practice guidance and falls short of the requirements set out in Surrey County Councils' guidance document "Travel plans a good practice guide for developers".

3.4 Noise Assessment

- 3.4.1 The planning application is supported by a Noise Assessment report, prepared by Air & Acoustics Consultants. Chapter 6 of the report deals with "Operational Road Traffic Noise" and explains that the assessment has been "based upon transport data provided by the project transport consultants".
- 3.4.2 The data used in the assessment is presented in a table in Appendix E of the report and appears to be based on daily traffic forecasts. These cover several traffic routes surrounding the site. The derivation of the forecasts is not explained nor can they be reconciled against the peak hour traffic forecasts in the TA.
- 3.4.3 Given the concerns expressed earlier in this report about the inappropriate TRICS selection process underpinning the TA and the significant underestimation of HGV traffic, it is inevitable that this casts doubt on the reliability of the noise forecasting calculations and the conclusions drawn from them.

3.5 Air Quality Assessment

3.5.1 The planning application is supported by an Air Quality Assessment report, prepared by Air & Acoustics Consultants. Sections 6.1 to 6.3 of the report are concerned with "Operational Impacts" related to "Traffic Emissions". The analysis of impacts is based on predicted traffic flows, including the proposed development, in the year 2027. The future year traffic forecasts used in the assessment are tabulated in Appendix C of the report. The source(s) of the data and the basis of the traffic forecasting methodology are not explained. Therefore, it is not clear if the analysis has been based on information supplied by the project transport consultants.

3.5.2 Given the concerns set out above in relation to the noise assessment, the traffic forecasts used for the air quality analysis need to be explained. If they have been derived on the same basis as the trip generation calculations in the TA, then the traffic forecasts will not be reliable (particularly in respect of HGV numbers) and the findings of the Air Quality Assessment will need to be reviewed and updated.

4. Summary and Conclusions

- 4.1.1 This report considers the transport aspects of the proposed redevelopment of land at Weybridge Business Park for a range of industrial uses. The assessment has been based on a review of relevant planning documents submitted by the applicant. It is concluded that the applicant has failed to provide sufficient information or analysis to enable the impacts of the proposed development to be quantified. Furthermore, errors in the TA mean that the traffic generation from the proposals has been significantly underestimated. As a result, there is no objective basis on which to assess the true impacts of the development or whether such impacts can be adequately mitigated.
- 4.1.2 The A317 Weybridge Road corridor and Link Road traffic signals are acknowledged congestion hot-spots. Congestion problems here result in traffic being displaced onto Addlestone Road, causing further congestion adjacent to the site. Addlestone Road is used by many pupils attending Heathside School and St George's College, travelling on foot and by bicycle between Addlestone and Weybridge. The applicants' TA fails to acknowledge or quantify any of these issues, or include any analysis of the impacts of traffic generated by the development.
- 4.1.3 The trip generation assessment provided by the applicant is flawed and does not reflect the nature and mix of the proposed development, particularly in relation to Unit 100 and its potential to generate high levels of HGV traffic. In addition, calculation errors in the TA mean that the stated trip numbers for the development and comparisons with the former office uses are incorrect. Therefore, it is concluded that the trip forecasting in the TA is inadequate and cannot be relied upon. Furthermore, there is no information about baseline traffic flows or future forecasts, with development traffic, hence there is no way to quantify the impacts of the development or the extent of mitigation measures required.
- 4.1.4 It is clear that the development has the potential to generate significant levels of HGV traffic, well in excess of the HGV forecasts presented in the TA. This is a particular concern as such vehicles, by virtue of their size and nature, will have a disproportionate adverse impact on traffic flows, air quality, noise and the safety of vulnerable road users.
- 4.1.5 It is the conclusion of this report that insufficient information has been provided to determine the impacts of the development or the extent of mitigation measures needed to limit impacts to acceptable levels. Accordingly, the proposals are contrary to Policy SD4 of the Local Plan.

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Subject:	Strong Objection for The Planning Application Reference "RU.22/0776"
Date:	12 June 2022 22:40:14
Attachments:	Wevbridge-Business-Park-Transport-Objections-SWTP-P1070v1-310522.pdf

To The Attention of Planning Officer

CC: Cllr Jonathan Wilson CC: Cllr Peter Snow CC: Cllr John Furey CC: Dr. Ben Spencer

Planning Business Centre, Runnymede Borough Council, Runnymede Civic Centre, Station Road, Addlestone, Surrey KT15 2AH

We are residents of 22 Tennyson Road, Addlestone, Surrey KT15 2SP and we strongly object the planning Application Reference Number - "RU.22/0776".

I request the local Councillors to look at this matter, as this affects wider residents of Runneymede and certainly affects us adversely and directly.

The reason for our objection are as follows -

1. Adverse impact on highway safety, significant increase in congestion and insufficient parking – Policy No SD4 & SL1.

Current Traffic on Weybridge Road & Addlestone Road creates bottleneck, especially during School runs and office hours. On days it takes exceptionally long period of time to drop my Son to St. James' Primary school and to go to work after. Currently Byron road is full of trucks and not only creates congestion but also hinders clear sight for the motorists turning in and out of the by lanes. I have had a couple of near misses myself as large trucks park on double yellow line and even on pedestrian paths.

The new 24 x 7 would not only increase pollution, noise and traffic but it would add congestion and would create nightmare for the local resident like us. There are primary and secondary schools around this key location which would make pedestrians vulnerable. There have been a few accidents already and the new development means much higher traffic and leaves

these kids more vulnerable.

2. Inadequate investment in local infrastructure including key known congestion hotspots – Policy No SD2 & SD3

A320 and A317 are already congestion hotspots, and the issue with the level crossing barrier causing delays on nearby road. Due to heavy rains, our local roads flood, causes massive congestions. I raised this point with visible pictures and my application was closed swiftly without any resolution. I was informed that this is not priority work and will not be attended to. I do humbly question, if we can not upgrade our basic infrastructure, how can this development handle this massive surge in traffic. Addlestone train station does not even have a bridge to maintain flow of traffic.

3. Increased pollution from vehicles, light pollution and noise pollution from 24/7 operation. Policy No EE2

Proposals with unacceptable adverse effects will not be supported, mitigation measures must be appropriate and be capable of being implemented. Light schemes should avoid impact on local amenity and nightlife. Our close proximity to the proposed site and 24x7 operations would certainly keep us awake at night. Due to pollution, we wont be able to keep our windows open (both day and night).

4. Adverse impact on habitats, biodiversity and the removal of trees, particularly along the river Wey – Policy No EE5

We bought our houses in this location due to its quaint location, rich flora and fauna. Our local locks and adjoining areas, Wey river Banks provide abundant natural habitat to the flora and fauna. With the new project - our local trees, plants, birds and animals are threatened. My 6 yr old Son looks forward to his local walks in weekends as he is learning how to keep the planet green and sustainable. This project is everything but sustainable, it is going to kill the beautiful habitat in the area.

5. Negative impact of construction in terms of traffic, noise and pollution on health and wellbeing – Policy No EE2

Runnymede should require construction management plan prior to the commencement. Proposals with unacceptable adverse effects will not be supported, mitigation measures must be appropriate and be capable of being implemented. Light schemes should avoid impact on local amenity and nightlife. Our close proximity to the proposed site and 24x7 operations would certainly keep us awake at night. Due to pollution, we wont be able to keep our windows open (both day and night).

I would request and I would sincerely appreciate if the above points are looked at in detail and the planning application - Reference "RU.22/0776" is declined.

Yours Sincerely,

Gagan & Parveen Sharma 22 Tennyson Road Addlestone Surrey KT15 2SP