

COMMITTEE AGENDA REFERENCE: 5C

APPLICATION REF:	RU.22/1846
LOCATION	Coombelands Animal Sciences Unit (ASU), Woodham Lane, Surrey, KT15 3NB
PROPOSAL	Hybrid planning application, with outline planning permission for the provision of x2 buildings, site levelling, creation of hardstanding, plant areas, sub stations, landscaping and associated works with detailed consideration of reserved matters relating to the means of access, layout and landscaping.
TYPE	Hybrid Application
EXPIRY DATE	23/03/2023
WARD	Woodham & Row Town
CASE OFFICER	Christine Ellera
REASON FOR COMMITTEE DETERMINATION	Major planning application.
<i>If you have questions about this report please contact Ashley Smith, Victoria Gibson or the case officer.</i>	

1. SUMMARY OF RECOMMENDATION

It is recommended the Planning Committee authorises the Head of Planning (HoP):	
1.1.	<i>To grant planning permission subject to the submission of additional ecological information to the satisfaction of the HoP and the planning conditions set out in section 11.</i>

2. DETAILS OF THE SITE AND ITS SURROUNDINGS

- 2.1. The Department of Environment, Food and Rural Affairs (DEFRA) land ownership comprises approximately 105 hectares of land situated between Rowtown to the north, Woodham to the south and the M25 to the east. The major part of the site is situated within the Green Belt and consists of Animal Science Units (ASU's) at (Halls, Grange, Coombelands and Holme) which are all used in connection with DEFRA on-site operation. The remainder of the land, approximately 8 hectares, is situated within the urban area to the north of Woodham Lane and this forms the main built complex of the laboratory building and associated structures.
- 2.2. Coombelands is located to the north of the main site and comprises the largest livestock facility (out of the ASU's on site), with buildings designed for larger livestock animals. Buildings 417 and 418 are located to the north of the site close to Farm Lane and

Coombelands Lane which is a residential area near to Row Town. The Addlestone Bourne flows through the overall site and to the north of the main site. The site is a laboratory / technical complex with associated farms forming one of Europe's major research centres for animal and plant health.

3. APPLICATION DETAILS

- 3.1. This is a hybrid planning application whereby planning permission is being sought for outline planning permission for two Class E research and development buildings, site levelling, creation of hardstanding, plant areas, sub stations, landscaping and associated works. Detailed planning permission is being sought for Access, Landscaping and Layout. The manner in which they are seeking planning permission is that in agreeing these reserved matters the applicant can commence site level works and landscaping. Prior to further works reserved matters regarding Appearance and Scale would be required.
- 3.2. Whilst matters regarding Appearance and Scale would be considerations for future reserved matters applications, as part of this planning application parameter plans have been proposed which seeks to agree the maximum parameters for the scale of any proposal. The following assessment shall be made based on these parameters (and therefore the “worst-case” scenario).
- 3.3. Building 1 would be located to the southern side of the application site, adjacent to existing woodland. The position of this building would be located on a relatively flat grassed area. The proposed floor area would be some 70m in length and 26.5m in width. The maximum height parameters would be 13.9m with a further 3m in height above for any potential flue above. Two plant enclosures are proposed as part of building 1 and bin enclosures in the southwestern corner. Whilst not specified in the proposed plans the Noise Assessment states that the plant equipment to the west of building 1 would be for the air source heat pumps and those to the east, the emergency back-up generators.
- 3.4. Building 2 is located to the western ends of the site. Due to the level changes this would require a significant excavation of land, up to 3m in height for the land to be level with adjoining buildings. This building would be 34m in length and 20 in width and up to 8.7m in height, much of the proposed height would be to accommodate plant equipment incorporated within the building. This building would also include one adjoining plant enclosure and two detached enclosures. Whilst not specified in the proposed plans the Noise Assessment states that the plant equipment adjoining the building would be for the air source heat pumps and those to the north, the emergency back up generators.
- 3.5. The Arboricultural Report states that a total of 10 trees (4 high quality trees, 4 moderate quality trees, 1 low quality tree and 1 very low quality trees) will be removed as part of this planning application, as well as a liner group of trees of moderate quality and part of 2 hedges. A detailed landscaping plan has been submitted during the consideration of this planning application. This includes grassed and wildflower areas, the planting of 21 semi mature trees around the western perimeter of the application site and 30 trees in pots around the new hardstanding areas to the east of building 2.
- 3.6. Appearance of these buildings is not a consideration of this planning application and would be for a future reserved matters application. However, the Design and Access Statement submitted for each building separately suggests the indicative appearance of the buildings would be brick and metal cladding of similar appearance and colours to

agricultural barns

4. RELEVANT PLANNING HISTORY

- 4.1. The planning history for this site is extensive. The first Council records of planning history for the wider site is CHE.3997. There was a masterplan for the site which was first established through application RU.97/1317 and subsequently updated in 2005 through RU.05/1316. Given the time that has passed since the latest masterplan, the evolving needs of the APHA site and the future investment into the site that was announced by central government in March 2020, DEFRA are undertaking further master planning for the wider APHA Site. This planning application is coming through independent from the wider discussions.

5. SUMMARY OF MAIN RELEVANT STRATEGIES AND POLICIES RELEVANT TO THE DECISION

- 5.1. The Borough's current adopted Development Plan comprises of the Runnymede 2030 Local Plan which was adopted on 16 July 2020 and the policies have to be read as a whole.
- 5.2. National Planning Policy Framework (revised July 2021) acts as guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications. 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)
- 5.3. SPDs which can be a material consideration in determination:
- Runnymede Borough Parking Guidance (2022)
 - Runnymede Design Supplementary Planning Document (2021)
 - Green and Blue Infrastructure Supplementary Planning Document (2021)
 - Infrastructure Delivery and Prioritisation (2020)

6. CONSULTATIONS CARRIED OUT

6.1. Consultees responses

Consultee	Comments
Natural England	No objection- Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes
National Highways	No objection- Having reviewed the information in relation to this planning application we are satisfied that this proposal will have no meaningful

	impact on the safe and efficient operation of the Strategic Road Network.
Highway Authority	No objection- having assessed the application on safety, capacity and policy grounds subject to conditions
Lead Local Flood Authority	No objections- satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed, subject to our advice below.
Surrey Wildlife Trust	Recommend that the LPA require the Applicant to submit the following prior to determination of the planning application: <ul style="list-style-type: none"> • Additional Bat presence/likely absence survey data for buildings that will be impacted by the proposal. • Clarification on the loss of retention of tree T85 • Additional evidence-based justification on reptiles and on Great Crested Newts
Arboricultural Officer	Raises objection- The removal of 4no. category A trees to enable the development is unacceptable. Though the trees are stated in the report as being in the life stage of semi mature which might be technically correct for such a long-lived species; to most observers a tree of 1m in trunk diameter and 20m tall is a mature tree. These trees are of significant age and size, they each support a vast diversity of other species throughout their structures. I cannot support the removal of these tree as mitigation for their loss and the loss of the habit they provide is not possible to achieve in an acceptable time scale. I do note that the applicant has proposed semi mature tree planting, but this well-meaning proposal cannot in my professional opinion mitigate the loss of these trees. I cannot see the removal of these trees can be justified solely by the intended use of the proposed buildings if they could be sited elsewhere on the estate.
Contaminated Land	No objections
Archaeology Officer	No objections subject to conditions
SCC Waste and Minerals	No objection subject to Runnymede Borough Council being satisfied that the development includes adequate and appropriate facilities for waste storage and recycling, and that adequate controls exist to ensure that such facilities are maintained and managed for the life of the development and that conditions secure a Waste Management Plan prior to commencement.
SCC Rights of Way Officer	No comments received.

6.2. Representations and comments from interested parties.

6.3. 46 Neighbouring properties were consulted in addition to being advertised on the Council's website, site notices in press and an initial site notice. Further to this, 3 letters of representation have been received, comments made can be summarised as follows:

- Concerns about noise and disturbance during construction

- Concerns about noise and smells from the Farm and concerns about light pollution
- Coombelands Lane is not a suitable road for traffic
- Residents will view the sheds

7. PLANNING CONSIDERATIONS

7.1. In the determination of this application regard must be had to the Development Plan and National policy within the NPPF. The application site is located within the urban area where the principle of such development is considered to be acceptable subject to detailed consideration. This must be considered in light of the presumption in favour of sustainable development advocated by the NPPF. The key planning matters are:

- Principle of development and wider impact on the Green Belt
- Design considerations including visual impact and loss of trees
- Ecological considerations, including impact on adjoining environmental designations and biodiversity net gain.
- Impact on Neighbouring Amenity
- Highways Considerations
- Flood protection, mitigation and sustainable urban drainage
- Renewable and Low Carbon Energy
- Other Considerations

Principle of development and wider impact on the Green Belt

- 7.2. The application site resides within the wider Animal and Plant Health Agency Site, which is located in New Haw, north of Woodham Lane. The operations are as a laboratory / technical complex, with associated farms forming one of Europe's major research centres for animal and plant health. The site effectively provides for public service infrastructure. Before considering the principle of the development in the Green Belt it is worth noting that the NPPF and the Local Plan support the delivery of such infrastructure subject to the wider consideration as will be detailed below.
- 7.3. The site is located within the designated Green Belt, with the location of the proposed new buildings within the wider site area of the Coombelands Animal Sciences Unit, which is a research and development operation forming part of the wider APHA Facility. On this basis the proposal represents development on previously developed land (as defined in the NPPF).
- 7.4. The NPPF states that on previously developed land within the Green Belt limited infilling or the partial or complete redevelopment is only acceptable where the development would not having a greater impact on the openness of the Green Belt than the existing development. Policy EE17 of the Local Plan provides further guidance of factors to be taken into consideration.
- 7.5. The proposal would result in development in a part of the site which is currently absent of built form and therefore the development would have a greater impact on openness than the existing green field, a position which the applicant accepts. The proposed development is therefore by definition inappropriate development in the Green Belt.

- 7.6. In terms of the wider harm to the openness of the Green Belt. When considering the maximum parameter proposed by the applicant in spatial terms the proposed buildings are substantial in size. Both with large footprints and building 1, located to the southern end of the application site would be the largest with a maximum height parameter of 13.9 metres with an additional flue up to 3 metres in height above the ridge. Building 2 would be up to 8.7 metres in height with excavation works also proposed. In visual terms, and as discussed further below, conditions can seek to ensure that at the reserved matters stage regarding scale and appearance these buildings comes forward in a manner whereby they would be read as part of the wider farm and operations which currently taking place on this site. The existing layout of buildings on this site and the proposed location of the new buildings means that public views are very limited. Overall, it is considered that the proposed harm to the openness of the Green Belt is considered to be limited to moderate.
- 7.7. In terms of the impact on the purposes of the Green Belt, the aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Given the proposed is located within the confines of the existing APHA site, within the existing farm operations at Coombelands it is not considered that the proposal would undermine the purposes of the Green Belt.
- 7.8. To summarise, the proposal represents inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It is also considered that there would be some limited to moderate harm to the openness of the Green Belt.
- 7.9. The NPPF (2021) is also clear that when considering any planning application substantial weight is given to any harm to the Green Belt. 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A full assessment of the planning application will be undertaken to identify any harm to the Green Belt and any other harm resulting from the proposal. An assessment of Very Special Circumstances will then be undertaken.

Design considerations including visual impact and loss of trees

- 7.10. Policy EE1 of the Local Plan sets out that development should be visually attractive, achieve high quality design, and respond to and be sympathetic to local character/context. The Council's adopted SPD on design provides further guidance regarding how development proposal should respond positively to local context. The National Planning Policy Framework (2021) sets out that developments should respond to local context, as well as functioning well and add to the overall quality of the area, not just for the short term but over the lifetime of the development as well as being visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- 7.11. The planning application is seeking full planning permission to undertake site levelling works and landscaping. The proposed layout and position of the buildings is therefore a consideration of this planning application.
- 7.12. The proposed position of the development would mean that 10 trees would be removed as part of this planning application, which include 4 Category A (high quality) trees and 4 category B (moderate quality trees). Whilst the development proposes the planting of 21 semi mature trees around the west perimeter of the application site these will take a number of years to grow into maturity. Good design requires a development to respond

to site constraints (this is set out in the NPPF, the National Design Guide the Local Plan and through to the Councils Design SPD). This proposal is inherently dictated by the design requirements of the applicant to provide a specific facility as opposed to having regard necessary for the existing site constraints. Largely the applicant's justification of this approach appears to come down to the applicant's case for the need of the development. This is detailed below as part of their Very Special Circumstances Case. The applicants have a requirement for updated facilities which they claim is required in a specific location.

- 7.13. Irrespective of the applicants "needs case" the proposed development would result in the loss of a number of mature trees and whilst replacement and enhanced planting is proposed it will take a number of years to mature and in the interim period there will be some harm associated with this. The Council's Arboricultural Officer has raised objection in this regard. The proposal would result in some harm due to the loss of the existing mature trees, having regard of the proposed replacement planting this harm is considered to be moderate. This will be considered further as part of the planning balance.
- 7.14. Scale is not a consideration of this planning application, but the applicant is seeking to agree maximum parameters for which future reserved matters application would come forward. Building 1 with a maximum height parameter of 13.9 metres with an additional flue up to 3 metres in height above the ridge would be a large building. The indicative plans supporting the application contained within the Design and Access Statement show how the massing and scale of the building can be reduced through the roof profile of the proposed building. In terms of building 2 this building is up to 8.7 metres in height, but the excavation works associated with levelling the land to facilitate this building mean that the buildings visual prominence is significantly reduced. The maximum height parameters proposed are largely aligned with the highest point of the existing agricultural buildings towards the front of the Coombelands site. Overall and having regard for the siting and position, the maximum parameters proposed for the scale of the buildings are considered to be visually acceptable and would be read as part of the wider farm buildings already on the site. Public views of these buildings are very limited and restricted given its position well within the confines of the site. and would not be overtly prominent within the wider area.
- 7.15. As set out above, appearance of these buildings is not a consideration of this planning application and would be for a future reserved matters application. However, the Design and Access Statement submitted for each building separately suggests the indicative appearance of the buildings would be brick and metal cladding of similar appearance and colours to agricultural barns, which would reflect those already on this part of the site. Conditions are recommended that future reserved matters for both scale and appearance come forward in accordance with the details contained in the Design and Access Statement regarding these matters.

Ecological considerations, including impact on adjoining environmental designations and biodiversity net gain.

- 7.16. In accordance with policy EE9 on Biodiversity, Geodiversity and Nature Conservation of the Local Plan the Council expects biodiversity asset protection to be achieved primarily through avoidance, and then mitigation. The application needs to demonstrate that the impact of proposals, either alone or in combination, will not result in likely significant adverse effects.

- 7.17. Layout and landscaping are matters for consideration as part of this planning application and as such there are a number of matters which need to be considered as part of the planning application. A number of ecological reports have been submitted in support of this planning application; this includes; Technical Note – Ecology (dated November 2022), Bat Roosting and Bat Activity Report (dated January 2022), Preliminary Ecological Appraisal (dated March 2021) and a Reptile Survey Report (dated November 2021), all prepared by prepared WSP.
- 7.18. Following initial queries raised by Surrey Wildlife Trust the applicant provided a response to matters raised. However, the initial response has failed to fully clarify a number of matters raised by the Council's ecological advisors. This includes the need to clarify if a building is being demolished as part of the planning application (and thus the bat report should have regard for this), works to trees, evidence-based justification for limited suitability of the grassland habitats for reptiles and additional clarification on presence/likely absence surveys regarding Great Crested Newts.
- 7.19. The applicants have, in their response dated 03.07.23 committed to clarifying matters, including confirming that that there was an error in a previous report which sought to fell additional trees and confirmed the development does not include the demolition of an existing building on site. They have also advised that they are in a process of preparing additional documents to demonstrate that the site has limited suitability of the existing grassland habitat for reptiles. They have also provided a recent waterbodies sampling document dated March 2023 which shows there are no Great Crested Newts in the locality. Once the applicant has provided all the outstanding information and updated reports to aligned with the points of clarification set out in the Applicants letter, officer will re-consult Surrey Wildlife Trust as our ecology advisors. Given the commitment by the developer and the likelihood additional information can satisfy the outstanding queries, the officer recommendation is that delegated authority be given to grant planning permission subject ecological matters being resolved to the satisfaction of the HoP.
- 7.20. In addition to the above it is necessary to demonstrate opportunities to enhance or create new benefits for wildlife. The completion of the development should result in a measurable long-term net gain for biodiversity. Further to a request from the case officer the applicant has submitted details of their Biodiversity Net Gains strategy and utilised Natural England's Biodiversity Metric to calculate the biodiversity of a site before and after development. Based on the landscaping plan proposed the scheme achieves a quantitative net gain for area-based biodiversity units of 11.07% Net Gain in Area-based Habitat Units and 59.07% Net Gain in Hedgerow Units. A condition regarding a Landscape Environment Management Plan which will seek to implement and maintain the proposed landscaping area is recommended in condition 12.

Impact on Neighbouring Amenity

- 7.21. Layout and the proposed position of the buildings is a matter for consideration under this planning application and whilst scale is not a reserved matter being applied for this planning application has sought to agreed parameters for how such details shall come forward under future reserved matters planning application and as such the maximum parameters (i.e. the worst case scenario) will be considered.
- 7.22. Policy EE1 sets out that "all development proposals will be expected to ensure no adverse impact ...to neighbouring property or uses". The Runnymede Design SPD provides further guidance of such matters including, sunlight and privacy. Paragraph 130 of the National Planning Policy Framework also sets out that all proposals are expected

to provide high standard of amenity for all existing and future users.

- 7.23. Due to the proposed location of the proposed new buildings, the nearest residential properties potentially affected by the proposed development are No. 61- 65 Farm Lane. The rear elevation of these nearby properties are 35m from the proposed building 2 and its associated plan. In addition, there is also a notable change of levels between Farm Lane and proposed building 2. Due to these level changes land will need to be excavated in order to provide level ground. The sections proposed show that ground level will be excavated down to the adjoining buildings, over 4m below the ground level of the nearby residential properties. The indicative sections show at maximum parameters much of the plant would not be visible from adjoining properties and that building 2 would appear to be around 4.5m above these properties around floor level. Building 1 would be well located away from neighbouring properties and close to existing woodland and thus would have limited impact on amenities of nearby residential properties. Having regards for the separation distance and the maximum height parameters proposed it is not considered that the proposed development would have a significant impact on neighbouring properties in terms of loss of lights and/or overbearing impact.
- 7.24. In terms of noise and disturbance, Policy EE2 of the Local Plan states that in terms of noise, proposals which have or would be subject to unacceptable adverse effects will not be supported. As part of this the policy is clear that proposals will need to consider the effects of external noise on outside amenity and where possible incorporate opportunities to create areas of relative tranquillity or areas which offer respite from high ambient noise levels. The NPPF (2021) states that planning decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health which includes noise. The NPPF (2021) further states that development should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 7.25. Plant equipment is proposed as part of the development in the form of building 1: x3 air source heat pumps, x9 air handling units and 1x emergency diesel generator and for building 2: x4 air source heat pumps, x2 air handling units and 1x emergency diesel generator. The emergency generators will be located in an external compound adjacent to each building. Operation of the emergency equipment is only expected during life-safety conditions and power failures.
- 7.26. Scale and appearance are reserved matters and as such full details would be expected as part of that planning application, but the Noise Impact Assessment submitted in support of this planning application seeks to limit maximum power levels and associated noise. This proposes that noise generated from plant would be 10db *below* background noise. The proposed diesel generators would only be used in backup situations where electric power to the area failed. Whilst the noise of these diesel generators would be 10db *above* background levels. In view that diesel generators would only be used in the rare case of a power outage it is considered that this would have an acceptable relationship with neighbours. However, an updated noise survey would be expected as part of reserved matters regarding scale and appearance to demonstrate compliance, it is recommended that this be secured by way of **condition 7**.
- 7.27. The potential impact on highway safety is considered further below, however, to avoid potential highway safety issues construction traffic would be from the part of the site known as “Halls Farm”, to the south of Row Town. This would result in a construction traffic going via internal roads to the Coombelands part of the site, taking construction vehicles to the

south of the residential development known as Strawberry Fields. In terms of impact on neighbouring amenity during construction, whilst the objection from local residents about the duration of the works are noted, the Local Planning Authority do not have the ability to control the timeframe it takes for construction works to be undertaken. Noise and disturbance during construction is dealt with under separate Environmental Health legislation. A Construction Management Plan has been submitted as part of this planning application however hours of construction do not accord with the established Runnymede Guidelines. For this reason (and for those set out below in terms of highway considerations) it is considered that an updated Construction Management Plan will be required prior to commencement of any works. This is set out in recommended **condition 8**.

- 7.28. Other concerns have been raised regarding animal smells etc. The site is an operational farm and whilst the farm operations go beyond a “typical” agricultural farm the buildings proposed are associated with that operational farm. There will always be an element of agricultural smells associated with the existing use on the site, this proposal will not change the existing use.

Highways Considerations

- 7.29. Policy SD4: Highway Design Considerations states that the Council will support development proposals which maintain or enhance the efficient and safe operation of the highway network, and which take account of the needs of all highway users for safe access, egress and servicing arrangements. The NPPF (2021) is clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 7.30. Whilst access is a consideration of this planning application the existing access would be unchanged as part of this development. The proposed development is to replace older buildings within the wider APHA estate which are coming to the end of their useful life. Whilst there is a requirement to provide a new facility in a “turn key” operation the proposed buildings are not seeking to increase the number of employees which are at the site or intensify activities above those which already take place. On this basis it is not considered that the proposed development would raise any additional highways issues in terms of highway safety, capacity of parking requirements.
- 7.31. To avoid potential highway safety issues construction traffic would be from the part of the site known as “Halls Farm”, to the south of Row Town to avoid potential highway safety concerns. A Construction Management Plan has been submitted as part of this planning application which sets out how construction traffic would be managed during construction. However, a construction site layout plan has not been provided and as such it is considered that an updated Construction Management Plan will be required prior to commencement of any works. This is set out in recommended condition 8.

Flood protection, mitigation and sustainable urban drainage

- 7.32. Policy EE13 of the Local Plan requires new development to not materially: impede the flow of flood water; reduce the capacity of the floodplain to store water; cause new, or exacerbate existing flooding problems, either on the proposed development site or elsewhere. The site is within flood zone 1, defined as less than 0.1% chance of flooding in any year. For a scheme of this size a Flood Risk Assessment (FRA) is required. The purpose of the FRA is to demonstrate that the proposal will not be in an area at risk of flooding and ensure that flood risk is not increased elsewhere.

- 7.33. An Enabling Works Drainage Strategy and Flood Risk Statement prepared by WSP has been submitted in support of this planning application. The potential increase to flooding from a development of this nature could be through any increase in impermeable areas, and the resultant increased risk of causing rapid surface water runoff to watercourses and sewers, thereby causing surcharging and potential flooding. There is also the potential for pollutants to be mobilised and consequently flushed into the receiving surface water system. Such matters need to be considered through managing sustainable drainage.
- 7.34. The development proposals include providing a surface water drainage network for the enabling works areas, as well as surface water connection points for proposed two new buildings. The proposed access roads will drain via gullies and channel drains. The Country Council in their role as the Lead Local Flood Authority have advised that proposed drainage scheme meets the relevant requirements and further matters can be dealt with by way of condition. It is therefore considered that the proposed will not be in an area at risk of flooding and suitable measures can be secured by way of recommended **condition 13 and 16** to ensure that flood risk is not increased elsewhere.

Renewable and Low Carbon Energy

- 7.35. New development is expected to demonstrate how it has incorporated sustainable principles into the development including; construction techniques, renewable energy, green infrastructure and carbon reduction technologies. Policy SD8: Renewable and Low Carbon Energy sets out that new development will be expected to demonstrate how the proposal follows the energy hierarchy (Be lean; use less energy, be clean; supply energy efficiently and be green; use renewable energy). For a scheme of this scale, it is also expected for the development to incorporate measures to supply a minimum of 10% of the development's energy needs from renewable and/or low carbon technologies.
- 7.36. Whilst scale and appearance are matters for consideration as part of future reserved matters applications an Energy and Sustainability Strategy prepared by AECOM has been submitted in support of this planning application. This strategy is very limited and does not commit to a certain percentage reduction in energy. However, the report does identify that a combination of ground source heat pumps, air source heat pumps or photo voltaic solar panels could be utilised to provide low carbon heating and hot water. The Noise Assessment (as noted further above) considers Air Source Heat Pump, officers assumes that this offers a robust assessment of the worst-case scenario of what operations could take place. A full energy statement which complies with the relevant planning policies in force at the time of the decision will be expected at the reserved matters stage for matters pertaining to scale and appearance. It will be expected that the energy strategy will be updated to respond to the technologies available to the applicant at the time of the consideration of such a planning application.
- 7.37. In addition to the above the Energy and Sustainability Strategy states that in relation to sustainable materials any future building will ensure materials are high quality and resilient, derived from recycled or reused content and are A-rated in the BRE Green Guide. It will be expected that the energy strategy will be updated to provide full details of this as part of any reserved matters application regarding appearance.

Other Considerations

Contaminated Land

- 7.38. Policy EE2 seeks, where relevant, contaminated land surveys are to be submitted as part of applications to determine the source of any pollutants and any remedial measures necessary. Paragraphs 174 and 183 of the NPPF (2021) seek to ensure that through decision making that suitable land remediation is secured through redevelopment.
- 7.39. A Geo-environmental Summary Report prepared by WSP was submitted in support of this planning application. The report seeks to assess ground conditions and potential contaminated land issues on this site. Based on the supporting evidence the Contaminated Land Officer has confirmed and potential contaminated land issues have been dealt within the report and that works should take place in accordance with the details provided. This is secured through recommended **condition 5**.

Archaeology

- 7.40. As the application site is over the 0.4 hectares an archaeological assessment and evaluation is required under policy EE7 of the Local Plan. A desk-based assessment has been submitted in support of this planning application that contains a review of information currently held in the Surrey Historic Environment Record together with other relevant sources in order to determine the potential for significant archaeological remains to be present. The report concludes that there are no designated heritage assets on the site itself but there is a moderate to high potential for Bronze Age, Iron Age and Roman remains based on known finds from the general area, although it is unclear whether evidence of activity dated to these periods extends into the site.
- 7.41. The Archaeological Officer has confirmed that further archaeological investigations will be required and that these investigations should take the form of a geophysical survey of the site followed by trial trench evaluation to assess the nature, extent and significance of any buried archaeological deposits that may be present and enable suitable mitigation measures as needed. It is considered that these matters can be secured by way of recommended **condition 14**.

Access for all

- 7.42. Both the Local Planning Authority and the applicant (as DEFRA) are required under s149 of the Equality Act 2010 (as amended to have due regard to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it).
- 7.43. Matters regarding level access would be considered by way of reserved matters application regarding works above ground level associated with the appearance of the buildings hereby approved.

8. Assessment for Very Special Circumstances

- 8.1. The harm identified in the above assessment is that the proposed development constitutes inappropriate development within the Green Belt, (harm by definition) which would also

have a limited to moderate impact on the openness of the Green Belt. This is given substantial weight.

8.2 The other harm identified is summarised as follows:

- Loss of existing high-quality trees and this is attributed moderate harm which is attributed significant weight.

The Green Belt balancing exercise therefore needs to be if 'other considerations' put forward as part of this planning application equate to Very Special Circumstances (VSC) which exists to outweigh the harm and any other harm.

8.3 The applicants Planning Statement also includes their case for VSC. Whilst the statement has suggested 3 factors which form the case they are putting forward, these can all be summarised as the need or requirement for this development associated with the wider operations at APHA. The applicants highlight that the APHA facility is of international importance to the scientific community and provides a centre of excellence for the scientific community in identifying and managing the health of the Country's natural environment. The applicants also highlight that the research and development work undertaken is a fundamental part of the UK's environmental protection and health. The applicants highlight that the building directly supports the specific research and development that occurs at this Site. Given the sensitivity of work undertaken on site there is a need for it to be delivered in a more remote position and this site presents the least sensitive location on the campus. They claim that not delivering this facility would directly impact upon the continued scientific research undertaken on site which, is of national and international significance.

8.4 The concluding remarks of the applicants VSC case are that the development proposed is required in this specific location and needed to perform a specific function which cannot, in combination, be met elsewhere on the wider APHA technical Site.

8.5 The difficulty officers have in readily coming to the same conclusions is that no supporting evidence has been provided regarding what the use all these buildings are nor why they cannot be accommodated within the wider land holdings of APHA, including the main campus in New Haw, accessed via Woodham Lane, which is within the urban area.

8.6 That being said, Officers have observed that the parts of the APHA site which are within the urban area and from the main scientific and research campus is largely already built over with limited space for further buildings. It is also a reasonable assumption that the activities on the main campus are fairly intensive and are subject to a number of activities and comings and goings across the day. Whilst the applicants have not readily set out the specific research use of these buildings Officers also accept that some of the works which are undertaken on the site are sensitive in nature and bespoke requirements are necessary. Taking all of this into consideration Officers also accept that were new buildings are required then in terms of a Green Belt location, the Coombelands Farm, which is already previously developed land in the Green Belt is the preferred location. The buildings would be located in a position whereby they would be read as part of the wider envelope of development on this site, yet do have some separation if necessary for operational requirements.

8.7 In view of the officer's assessment, it is considered that Very Special Circumstances exists to outweigh the harm to the Green Belt and any other harm.

9. PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 9.1. In line with the Council's Charging Schedule the proposed development would be CIL liable- the rate for such a development in our adopted charging schedule is however £0.

10. EQUALITY AND HUMAN RIGHTS CONSIDERATIONS

- 10.1 Consideration has been given to Articles 1 and 8 of the First Protocol of the European Convention on Human Rights. It is not considered that the decision would result in a violation of any person's rights under the Convention.

Consideration has been given to s149 of the Equality Act 2010 (as amended), which imposes a public sector equality duty that requires a public authority in the exercise of its functions to have due regard to the need to:

- (a) Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

It is considered that the decision would have regard to this duty.

11. CONCLUSIONS

- 11.1 In summary, the principle of the development represents inappropriate development in the Green Belt with a limited to moderate harm to openness and the loss of high quality trees which is also considered to result in moderate harm. However, it is considered that very special circumstances exist, in this case the need for the proposal as part of the wider operations of the APHA facility and how the proposal will support the sites continued scientific research in identifying and managing the health of the Country's natural environment. The proposed development will also secure biodiversity net gains. It is considered that Reserved Matters details can ensure that the proposed development is considered to be visually acceptable and will be read as part of the wider farm operations which take place at the Coombelands part of the site and would not have a detrimental impact on the amenities of the occupiers of surrounding properties. The proposed development would not result in an increase in employee numbers and thus is not considered to raise any highways issues. Subject to conditions the proposed development is also not considered to raise any further issues in terms of matters such as contaminated land, access for all or archaeology.
- 11.2 Subject to the submission of additional information that the proposed development will have no adverse effect on the integrity of any potential impacts surrounding habitats (designated or otherwise) it is considered that any harm caused from the proposed development; is

outweighed by the benefits of the scheme. Accordingly, the application is recommended for approval subject to the following set out below.

12. FORMAL OFFICER RECOMMENDATION

The HoP be authorised to grant planning permission subject to the submission of additional ecological information to the satisfaction of the HoP And the subject to the following planning conditions:

Compliance Conditions

1. Time limit

An application for approval of the reserved matters referred to in condition 14 shall be made to the Local Planning Authority before the expiration of two years from the date of this permission. The development hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of one year from the date of approval of the reserved matters to be approved, whichever is the later.

Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004.

2. Should this planning permission be implemented but reserved matters application(s) not be submitted within the timescales as set out in condition 1 (two years of the date of this planning permission) then within 32 calendar months of the date of this planning permission an updated landscaping plan shall be submitted and approved by the Local Planning Authority. This shall show how the areas for which the buildings 1 and 2 has been granted shall instead be soft landscaped (this will apply on a phased basis or otherwise). The details submitted shall include including full planting specification and a 'schedule of undertaking' The landscaping will then be undertaken and maintained in accordance with the approved details.

Reason: It has been considered that Very Special Circumstance exists for the proposed development given the operations need however were the ground works to commence but the reserved matters not to come forward then the Local Planning Authority will require that the land to be landscaped over to minimise harm to the Green Belt and to ensure high quality design and to comply with Policy EE1 and EE14 of the Runnymede 2030 Local Plan and guidance in the NPPF.

3. Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the approved the drawings as set out in the submitted the document titled "Drawing Schedule for Hybrid Planning Permission" dated 01 June 2023. This includes ground levels.

Reason: To ensure high quality design and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance in the NPPF.

4. Reserved Matters for Appearance and Scale

Notwithstanding the approved plans or any indication given otherwise the Reserve Matters referred to in condition 14 shall come forward in accordance with:

- The Reserve Matters relating to Building 1: Section 4.0- Development Parameters of the Design and Access Statement referenced: S0008855-SRA-XX-XX-RP-A-00001) and dated 17.11.2022
- The Reserve Matters relating to Building 2: Section 05.10 and 0.511 of the Design and Access Statement referenced: S0008920T26C-PWA-XX-XX-RP-A-00001 and dated November 2022

Reason: To ensure a visually acceptable scheme in accordance with policy EE1 of the Runnymede 2030 Local Plan and the National Planning Policy Framework:

5. Contaminated land

The ground works shall be undertaken in accordance with the details set out in the "Geo-Environmental Summary Report" prepared by WSP and dated November 2022.

In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it must be reported in writing immediately to the local planning authority and once the Local Planning Authority has identified the part of the site affected by the unexpected contamination, development must be halted on that part of the site. An assessment must be undertaken in accordance with the requirements to be agreed with the Local Planning Authority and where remediation is necessary, a remediation scheme, together with a timetable for its implementation must be submitted to and approved in writing by the Local Planning Authority in accordance with the requirements to be agreed with the Local Planning Authority in the form of a Remediation Strategy which follows the .gov.uk LCRM approach. The measures in the approved remediation scheme must then be implemented in accordance with the approved timetable. Following completion of measures identified in the approved remediation scheme, a validation (verification) plan and report must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with guidance in the NPPF.

6. Renewable energy/low carbon technology

Any forthcoming reserved matters application(s) regarding scale for the approved development shall include full details of how the scheme complies with the energy hierarchy and the chosen renewable energy/low carbon technology to be used, along with calculations demonstrating that a minimum of 10% of the predicted energy consumption would be met through renewable energy/low carbon technologies shall be provided in line with policies SD8 of the Runnymede 2030 Local Plan (or such updated policies which may enforce at the time the reserved

matters application is made) .

Reason: To ensure that a minimum of 10% of the energy requirement of the development is produced by on-site renewable energy sources/low carbon technology and to protect the amenities of occupiers of nearby properties and to comply with policies SD8 and EE1 of the Runnymede 2030 Local Plan and guidance within the NPPF.

7. Noise mitigation

Any forthcoming reserved matters application(s) regarding appearance and/or layout for the approved development shall include full details of noise mitigation measures including sound insulation performance requirements for the facades, windows and ventilators. This should be based on the Noise Impact Assessment revision 02 prepared by Hoare Lea, dated 16 November 2022.

Reason: To protect the occupants of the new development from noise disturbance and to comply with Policy EE2 of the Runnymede 2030 Local Plan and guidance within the NPPF.

Prior to commencement of development

8. Construction Transport Management Plan

Prior to commencement of development a Construction Transport Management Plan, to include details of:

- a) Parking for vehicles of site personnel, operatives, and visitors
- b) Loading and unloading of plant and materials
- c) Storage of plant and materials
- d) Measures to prevent the deposit of materials on the highway
- e) On-site turning for construction vehicles

Shall be submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason: This condition has a pre-commencement requirement to ensure that the development does not prejudice highway safety nor cause inconvenience to other highway users during the construction phase, and to comply with Policy SD4 of the Runnymede 2030 Local Plan and guidance within the NPPF

9. Landscaping

Prior to commencement of development full landscaping details shall be submitted to and approved in writing to the Local Planning Authority. This shall include including full planting specification and a 'schedule of undertaking' the proposed works and samples of all hard surfacing, as well as a plan for the long terms management of the landscaped areas.

All approved landscaping details shall be undertaken and completed in accordance with the approved 'schedule of undertaking.'

All approved landscaping works shall be retained in accordance with the approved details. If within a period of five years from the date of planting of any tree or shrub

shown on the approved landscaping plan, that tree or shrub, or any tree or shrub planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes seriously damaged or defective, another tree or shrub of the same species and size as that originally planted shall be planted in the immediate vicinity, unless the Local Planning Authority gives its prior written permission to any variation.

Reason: To ensure the development is adequately landscaped and to comply with Policy EE9, EE11 and EE12 of the Runnymede 2030 Local Plan and guidance within the NPPF.

10. Tree Protection

Prior to the commencement of development and before any equipment, machinery or materials are brought on to the site, a Tree Protection Plan based on the Arboricultural Impact Assessment prepared by WSP, dated November 2022 shall be submitted to and approved in writing by the Local Planning Authority and subsequently implemented in accordance with the approved details.

The works shall be carried out in accordance with the approved protection plan. The protective measures shall remain in place until all works are complete and all machinery and materials have finally left site. Nothing shall be stored or placed in any area fenced in accordance with this condition, nor shall any fires be started, no tipping, refuelling, disposal of solvents or cement mixing carried out and ground levels within those areas shall not be altered, nor shall any excavation or vehicular access, other than that detailed within the approved plans, be made without the written consent of the LPA.

There shall be no burning within six metres of the canopy of any retained tree(s). Where the approved protective measures and methods are not employed or are inadequately employed or any other requirements of this condition are not adhered to, remediation measures, to a specification agreed in writing by the LPA, shall take place prior to first occupation of the development, unless the LPA gives written consent to any variation.

Reason: To protect the trees to be retained, enhance the appearance and biodiversity of the surrounding area and to comply with Policies EE1, EE9 and EE11 of the Runnymede 2030 Local Plan and guidance within the NPPF.

11. Construction Environmental Management Plan

Prior to the commencement of development a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include details including, but not limited to:

- Map showing the location of all of the ecological features
- Risk assessment of the potentially damaging construction activities
- Practical measures to avoid and reduce impacts during construction including dust and air quality
- Location and timing of works to avoid harm to biodiversity features
- Responsible persons and lines of communication
- Use of protected fences, exclusion barriers and warning signs.

The development shall thereafter be carried out in accordance with the approved measures.

Reason: To reduce/avoid risk of ecological harm resulting from construction activities in accordance with paragraph 174 of the National Planning Policy Framework.

12. Landscape and Ecological Management Plan

Prior to commencement of any development a Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority, this includes a sensitive lighting plan. The LEMP should be based on the proposed impact avoidance, mitigation and enhancement measures specified in the section 4.5 of the Technical Note- Ecology prepared by WSP, dated 16 November 2022 and should include, but not be limited to following:

- Description and evaluation of features to be managed
- Ecological trends and constraints on site that might influence management
- Aims and objectives of management
- Appropriate management options for achieving aims and objectives
- Prescriptions for management actions, together with a plan of management compartments
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period
- Details of the body or organisation responsible for implementation of the plan
- Ongoing monitoring and remedial measures
- Legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery.
- Monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.
- Sensitive Lighting Plan
- Ecological Enhancement Plan

The development shall be undertaken in accordance with the approved details for construction of the development.

Reason: In the interest of protecting potential ecological value and species in the site as required by policy EE9 of the Local Plan

13. Surface Water Drainage Scheme

Prior to commencement of development details of the design of a surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

- a) Evidence that the proposed final solution will effectively manage the 1 in 30 (+25% allowance for climate change) & 1 in 100 (+25% allowance for climate change) storm events, during all stages of the development. The final solution

should follow the principles set out in the approved drainage strategy. The associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 1.3 l/s.

- b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
- c) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
- d) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- e) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site.

14. Archaeological work

Prior to the commencement of development a programme of archaeological work shall be implemented in accordance with a Written Scheme of Investigation, in accordance with the approved Archaeological Impact Assessment prepared by the WSP, dated January 2023, and which has been submitted by the applicant and approved by the Planning Authority.

Reason: To ensure that the development does not harm or destroy and archaeological remains in accordance with policy EE7 of the Runnymede 2030 Local Plan and paragraph 194 of the National Planning Policy Framework.

Prior to any works above the ground floor level

15. Submission of RMA applications

Prior to any works above the ground floor level of the buildings hereby approved (as shown in the approved plan) details of the appearance, scale of the building(s) called "the reserved matters") shall be obtained from the Local Planning Authority in writing on a phased basis or otherwise.

Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004.

Prior to first occupation

16. Verification report

Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid

reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

Reason: To ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SuDS.