

COMMITTEE AGENDA REFERENCE: 5D

APPLICATION REF:	RU.23/0066
LOCATION	Augustine House, Gogmore Lane, Chertsey, Surrey, KT16 9AP
PROPOSAL	Demolition of existing buildings and construction of a new mixed use redevelopment including up to 840sqm commercial space (Class E); up to nine residential units; and associated refuse, cycle parking and landscaping.
TYPE	Full Planning Permission
EXPIRY DATE	26/04/2023
WARD	Chertsey St Anns
CASE OFFICER	Jennifer Cade
REASON FOR COMMITTEE DETERMINATION	LISTED BY HoP
<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 HoP:	
To refuse planning permission for the following reason	
1.	The Sequential Test has not been passed as it has not been adequately demonstrated that there are no available sites at a lower risk of flooding. As such the proposal does not comply with Policy EE13 of the Runnymede 2030 Local Plan, the Runnymede SFRA and guidance in the NPPF.

2. DETAILS OF THE SITE AND ITS SURROUNDINGS

- 2.1 The application comprises a two storey office building with single storey commercial building to the southern western part of the site and surface car parking to the rear location to the north west of Gogmore Lane. The site has two existing vehicle access points to the north east and south west of the site. The surrounding area is characterised by a mixture of residential and commercial use. Neighbouring property Nexus (previously Flaxman House) located to the south west of the site has been extended and converted into flats and Hamilton Court to the north east has been converted into flats. To the rear are three storey terraced properties which front onto Riversdell Close and to the front of the site is Aldi and its associated car park.
- 2.2 The site is located within the town centre of Chertsey within the Urban Area and partially within Flood Zone 2.

3. APPLICATION DETAILS

- 3.1 This application seeks permission for the demolition of existing buildings and construction of a three-storey new mixed use development with Commercial space (Class E) and 9 residential units with associated refuse, cycle parking and landscaping.

The proposed new development comprises a three-storey building with a mansard roof with accommodation within the roof space. The upper floors overhang the ground floor parking area. The proposed building would have commercial use at ground and first floor with 9 residential flats at second and third floors. The building would have a maximum size of approximately a width of 35 metres, depth of 20 metres and height of 12.5 metres with mansard roof. The second and third floors are stepped in from the first floor.

3.2

Proposed Flats	Type	GIA
Flat 1	1 bed/ 2 person	50.20 sqm
Flat 2	2 bed/ 4 person	79.35 sqm
Flat 3	1 bed/ 2 person	50.20 sqm
Flat 4	1 bed/ 2 person	50.20 sqm
Flat 5	2 bed/ 4 person	79.35 sqm
Flat 6	1 bed/ 2 person	50.20 sqm
Flat 7	3 bed/ 5 person	88.45 sqm
Flat 8	2 bed/ 3 person	63.60 sqm
Flat 9	3 bed/ 5 person	88.45 sqm

- 3.3 The following supporting documents have been submitted to support the application:

- Cover Letter
- Planning Statement
- Design and Access Statement
- Townscape Character Study
- Notice Letter
- Notice 1
- Flood Risk Assessment
- Sequential Test
- Noise Assessment
- Plant Noise Impact Assessment
- Stage 1 Road Safety Audit
- CLD Desk Study
- Archaeological Desk Based Assessment
- Daylight and Sunlight Assessment
- Sustainability and Energy Statement

4. RELEVANT PLANNING HISTORY

4.1 The following history is considered relevant to this application:

Reference	Details
RU.03/0348	Outline Application for the demolition of existing office building and erection of two storey office building and an ancillary building. Grant Consent- subject to conditions May 2003
RU.02/0798	Outline application for the erection of two storey office building. Refuse September 2002
RU.02/0103	Demolition of existing office building and erection of two storey office building comprising 480 square metres and an ancillary building 45 square metres. Withdrawn April 2002
RU.94/0292	Change of use of site from builders yard to office use. Conversion of ground floor stores to office accommodation with associated car parking & single storey rear extension to create toilet block. Amend car parking & access arrangements. Grant Consent- subject to conditions May 1994
RU.87/0327	Erection of two storey office & storage building following demolition of existing buildings K/as George House, Gogmore Lane. Grant Consent- subject to conditions June 1987
RU.87/0089	Erection of 2 storey building of approx. 3,000 sqft to provide office & storage space and provision of eight parking spaces, following demolition of existing buildings. Withdrawn March 1987
CHE.5193	Builders yard and workshop. Grant Consent- subject to conditions February 1947

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

5.1 National Planning Policy Framework and Guidance.

5.2 The Runnymede 2030 Local Plan was adopted on 16 July 2020 and the policies have to be read as a whole. Any specific key policies will be referred to in the planning considerations.

5.3 SPDs which might be a material consideration in determination:

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

6. CONSULTATIONS CARRIED OUT

6.1 Consultees responses

Consultee	Comments
RBC Drainage Engineer	No objection subject to SUDS condition.
RBC Environmental Health	A full noise and vibration assessment should be carried out prior to commencement and glazing and trickle ventilators should be installed in line with the recommendations in the noise assessment and details of alternative ventilation methods for front bedrooms should be provided to protect the amenity of future occupiers
RBC Contaminated Land	No objection subject to pre-commencement conditions for site characterisation and other matters
RBC Deputy Direct Services Manager	No comments
RBC Conservation Officer	The proposal would preserve the character and appearance of the Conservation Area and would not harm the significance of any listed buildings due to the change in their settings.
SCC Drainage	No objection subject to SUDS and SUDS verification condition.
SCC Archaeology	Due to the site being redeveloped in the past for the existing office building and being outside the Area of High Archaeological Potential there would be no further archaeology requirements.
SCC County Highways Authority	No objection subject to conditions relating to EV charging, cycle parking and vehicle access
Environment Agency	No comments to make

Representations and comments from interested parties

6.2 84 Neighbouring properties were consulted in addition to being advertised on the Council's website and 11 letters of representation have been received in regard to the original scheme and a further 1 letter following the receipt of amended plans, which can be summarised as follows:

- Concerns regarding overlooking, loss of privacy and shadowing of existing properties
- Request a better block plan is provided to show distances to neighbouring properties (*officer note: an additional block plan was requested and submitted*)
- Concerned regarding impact of height and mass being oppressive and imposing from houses on Riversdell Close
- Building is larger than any other building in the immediate area
- Proposal would be out of keeping with the character of the street and location
- Is two storeys higher than existing building

- Overdevelopment of the site
- Four storey part of Nexus building is not directly opposite residential windows in Riversdell Close
- Past rejections RU.02/0798 (demolition of Augustine House and replace with two storey commercial property refused for being overbearing, increased level of overlooking and loss of amenity) and RU.21/1634 (4/ 5 storey building comprising 54 apartments at 2 and 2a Guildford Road Chertsey refused for being out of character with the street scene, overbearing and harm to existing residential amenities) for similar schemes in the area. It would be inconsistent for planning committee to grant current application considering recent decisions.
- Concerns regarding security and antisocial behaviour for local residents with 24/7 gym
- During 'silent hours' site will be unstaffed and unmanned which could have security issues
- If granted should have enhanced boundary wall to rear of site and has secured gated access to parking area
- Lack of parking for residential units provided
- Gogmore Lane has double yellow lines so overspill parking will be on Riversdell Close
- Concerns regarding increased mass with increased floor area and ceiling height
- Concerns regarding proximity to side and rear boundaries
- Will set a precedent for similar development
- Residents have not had time to verify test results (daylight and sunlight assessment) and doesn't take into account sun position at different times of year
- Noise report does not reference effect of the noise produced by the development on existing neighbourhood residents
- Concerns regarding noise from commercial use and gym plant on existing residents
- RBC Environmental Health consultation response raises concerns
- Request condition for controlling noise and vibrations from proposed use
- Trees to be planted along boundary will overhang gardens and could be used for climbing over the wall
- Nuisance from demolition and construction
- First floor is not 22 metres away from rear of houses as per Runnymede Design SPD
- Development will be 5 metres from rear boundary which is closer than any other development on Gogmore Lane
- 2D drawings are misleading in height of surrounding buildings
- Is the proposed gym viable with River Bourne Health Club close by? Would it end up being used as office building?
- Proposed building will block sun from roof solar panels on nearby building
- Amended plans do not address previous concerns or objections

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 as follows:

- The principle of development

- Flooding Considerations
- Design Considerations including character of the area and heritage assets
- Provision of suitable residential environment
- Impact on neighbouring amenity
- Highways
- Archaeology
- Blue and Green Infrastructure
- Contamination
- Other matters

The principle of development

7.2 *Loss of commercial unit*

The site is within the designated Town Centre of Chertsey. The proposal would result in the loss of the existing office building (300sqm) and sui generis workshop (160sqm), however the proposal would provide 836sqm of commercial space (Class E) so would result in an increase in commercial floor area in addition to residential units. The site is not designated for employment land but is within the defined town centre of Chertsey where commercial (Class E) on lower floors with residential use on upper floors is encouraged. The lower floors are proposed to be used as a gym which would create a new leisure facility. Providing additional housing in such areas supports local services and facilities and would also help to maintain the vitality and viability of the local centre in accordance with Policy IE6. The surrounding area is mixed use with both commercial and residential uses.

7.3 *Suitability of the site for the proposed use*

The site is located in the urban area in a sustainable location within Chertsey town centre. Given its proximity to the primary shopping area, other local centre services and public transport services the location is considered to be suitable for both commercial (Class E) and residential use. It is recognised that Policy SD1 seeks to encourage new development within the larger settlements of Runnymede of which Chertsey is one, as such the proposal is consistent with Policy SD1. Therefore, the redevelopment of the site for mixed use commercial and residential use is considered acceptable. However, this is subject to other considerations as set out below.

Flooding Considerations

7.4 The application site is located partially within Flood Zone 2 and a Flood Risk Assessment and Sequential Test has been submitted with the application. The proposal is a mixed use scheme and will introduce More Vulnerable (residential) development such that the development will need to pass the Sequential Test. However, no evidence has been provided that land owners of sequentially preferable sites have been contacted to adequately assess whether they are reasonably available and therefore more suitable than the application site. Therefore, the development has failed to pass the Sequential Test in line with guidance in the NPPF and the Runnymede SFRA.

7.5 As the development has not passed the Sequential Test, there is no need to consider the exceptions test, nor flood risk of the proposed development further and the development fails to comply with Policy EE13 and paragraphs 159 and 161 of the NPPF.

Design Considerations including character of the area and heritage assets

- 7.6 Government policy contained within the NPPF attaches great importance to the design of the built environment. Proposed new development should respond to local character, be of a high standard of design and seek to improve the character of the area. Paragraph 134 of the NPPF advises that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area which is also reflected in Policy EE1.
- 7.7 In terms of the design and appearance of the proposed building, the proposed block would be readily visible from Gogmore Lane and also from properties to the rear. The surrounding area is characterised by mainly two and three storey residential buildings (both flats and terraced properties) as well as a flat roof single storey commercial building (Aldi) to the front of the site. The surrounding buildings are mostly brick built with some render also present. The proposed building would be a three-storey building with a mansard roof with accommodation within the roof. The building would be constructed of red brick with elements of off-white render and brown brick detailing with grey roof tiles. There are several examples of mansard roofs within the surrounding area such as Nexus and Coronation House and the materials are similar in style to the surrounding buildings. Therefore, the overall design and appearance is not considered to be out of keeping with the surrounding area.
- 7.8 The proposed building would have a large footprint, but would not be set further forwards than either neighbouring building (Nexus or Hamilton Court). The building would be set off the side boundary by 1.7 metres on the southwestern side and 2.7 metres (at first floor and above) on the north eastern side boundary. The stepped in first floor element would extend further to the rear with a separation distance of 4.8 metres from the rear boundary. It is noted that the building would be higher than both neighbouring properties with the eaves height higher than the closest ridge height on both Nexus and Hamilton Court. This would result in a higher more prominent building compared to the neighbouring properties, which is a negative of the scheme, however it is noted that the proposed building would not be a dissimilar height to the terraced properties fronting Riversdell Close to the rear of the site or the southern part of Nexus building. Therefore, although the proposal would result in an increased height and scale of development on the site it is not considered to harmfully dominate the street scene or be out of character with the surrounding area and given its town centre location is considered to comply with Policy EE1.
- 7.9 The site is located close to the Chertsey Conservation Area. The Councils Heritage Advisor has reviewed the application and advised that the existing 20th century building has no heritage significance and so its demolition is considered acceptable. Whilst the height and size of the proposed building would be greater than the existing, the distance between the site and the heritage assets as well as intervening forms of other buildings, would mean that there would be no harmful impact on significant views of either the listed buildings or from within the Conservation Area. The proposed building may be seen from the rear of some buildings along Guildford Street, including the listed buildings, but would be seen within the context of similar size residential buildings. This intervisibility would not result in harm to either the significance of the Conservation Area or the listed buildings. Overall, as part of the setting of the Conservation Area and the listed buildings the proposed buildings would have a neutral effect on the significance of the heritage assets. Therefore, the proposal would preserve the character and appearance of the Conservation Area and would not harm the significance of any listed buildings due to the change in their settings in accordance with Policy EE4 and EE5.

Provision of suitable residential environment

- 7.10 All proposals are expected to provide high quality homes. Policy EE1 states that development proposals should ensure no adverse impact on the amenities of occupiers of the development proposed. In addition, Policy SL19 of the Local Plan sets out the minimum floor space standards expected for new developments to accord with which has been complied with (detailed in Section 3.2). Each flat is provided with a private terrace/ balcony and the site is also within walking distance of a public green space (Gogmore Farm Park). Several of the flats are single aspect, however none are north facing. A Daylight and Sunlight Assessment has been submitted with the application which confirms that all the proposed flats would benefit from daylight levels in excess of the relevant requirements. Bin and bike stores have been provided for the proposed flats. Therefore, the proposed flats are considered to have suitable internal and external amenity areas in accordance with Policy EE1.
- 7.11 The site is located in close proximity to Aldi and the proposal includes commercial use (gym) at ground and first floor. A noise impact assessment has been submitted with the application. The Noise Assessment confirms that all internal habitable rooms will meet the required noise levels when fitted with suitable double glazed windows and acoustic trickle ventilators. Bedrooms on the front elevation would need to be provided with alternative ventilation measures. The Councils Environmental Health Officer has reviewed the application and the noise impact assessment and commented that a full noise and vibration assessment should be carried out prior to commencement and glazing and trickle ventilators should be installed in line with the recommendations in the noise assessment and details of alternative ventilation methods for front bedrooms should be provided to protect the amenity of future occupiers. These can be secured by way of condition.
- 7.12 It is noted that several of the balconies, particularly those on the front elevation, will have higher noise levels given the road traffic and proximity to Aldi, however the noise report states that given the front balconies are set slightly in from the outer edge the expected daytime noise levels are considered to be below the 55dB guidance value. Whilst the balconies may suffer from higher noise levels, the site is within a town centre location and the site is within walking distance of a Gogmore Farm Park so future occupiers would be able to access suitable external amenity areas. Therefore, the proposal is considered to provide suitable levels of amenity of future occupiers in accordance with Policy EE1 and EE2.

Impact on neighbouring amenity

- 7.13 Turning to existing residents, the closest neighbouring properties are those within Nexus Building, Hamilton Court, and 18-27 Riversdell Close. The first floor (which overhangs the ground floor car parking area) of the proposed building extends further to the rear than the rest of the building which is 4.8 metres from the rear boundary and 17 metres from the rearmost elevation at No. 23 Riversdell Close. The first floor serves the gym and has no windows in the rear elevation; however, it will bring first floor built form closer to the rear boundary with a height of approximately 7.5 metres. The upper floors of the building are set further back from the rear boundary. A daylight sunlight report has been submitted with the application which assessed all windows in the rear elevations of 18-27 Riversdell Close as well as their gardens and the nearest side and rear windows at Hamilton Court. The report concluded that taking into account the proposed development, all windows and rear gardens at 18-27 Riversdell Close meet the required guidelines. One window in Hamilton Court failed to meet the required standards, however a further assessment was undertaken and this window is a secondary window with 2 other windows in the front elevation. Nexus is located to the south west of the proposed development so will not be overshadowed by the proposal. Notwithstanding this, although the first floor is close to the rear boundary it is set off by almost

5 metres and the upper floors are set further back. The proposal would not break a 45 degree line from the closest rear windows at Nexus or Hamilton Court and the second storey is stepped in significantly compared to the first floor. There are 3 windows in the side elevation of Hamilton Court and 2 windows in the side elevation of Nexus facing the application site. Both side windows in Nexus are obscurely glazed and the side windows on Hamilton Court are all either secondary or serve non habitable rooms. It is acknowledged that the proposed development will result in some harm to properties along Riversdell Close due to the height and massing closer to the boundary, however given the stepping back of the building with mansard roof and results of the daylight and sunlight report the proposal is not considered to have an unduly harmful impact on neighbouring properties along Riversdell Road such to warrant refusal with regard to amenity.

- 7.14 There is a minimum separation distance between the nearest rear window of the proposed development and the rear boundary of 10 metres and a distance of 22.5 metres to the rear extension at No. 23 Riversdell Close. The Runnymede Design Guide states that a distance of 22 metres between habitable rooms is an acceptable distance which has been met. Therefore, is not considered to be any harmful overlooking towards properties along Riversdell Close. There are two windows in both side elevations at first floor. These windows serve the gym and are set in from the side boundary by a minimum of 4.7 metres and would overlook the parking areas of both Nexus and Hamilton Court. No other windows are proposed to be inserted in either side elevation. Flats 2 and 5 have a terrace close to the side boundary. To prevent any overlooking from these terraces a condition is recommended to secure screening to the side of these terraces. There are no neighbouring properties directly to the front of the site. Therefore, subject to conditions it is considered that the proposal would not have an unduly harmful impact on the residential amenity of neighbouring properties in accordance with Policy EE1.
- 7.15 A second noise assessment has been submitted in relation to the plant equipment as requested by the Councils Environmental Health Officer. The Councils Environmental Health Officer has reviewed the report and states that the plant equipment would meet the noise rating levels required and there should be no adverse impact on residential amenity through the plant installed on the proposed development and had the scheme otherwise been considered acceptable this could have been secured by way of condition.
- 7.16 It is noted that several letters of representation have raised concerns regarding anti-social behaviour and security concerns. The commercial use (gym) is proposed to be used 24/7 and there will be an element of natural surveillance from the residential units above.

Highways

- 7.17 The site will modify one of the existing vehicle access points (access point to south west of site) with the access to the north east to be removed with footpath reinstated. 26 parking spaces are proposed to be provided (20 for commercial and 6 for residential). There will also be 18 cycle spaces for residents and 4 cycle spaces for the commercial use. It is noted that 6 parking spaces for 9 residential flats is below the guidance in the Runnymede parking SPD, however the site is in a sustainable town centre location in close walking distance to Chertsey Railway Station, other public transport links and local services. Similarly with the commercial use, given the sites sustainable town centre location the lower parking numbers are considered to be acceptable. All residential spaces will have EV charging and 20% of commercial spaces will have EV charging and a further 20% will have passive capacity. The County Highways Authority have assessed the application on safety, capacity and policy grounds and has not raised any objections and recommends conditions in relation to securing

EV charging, cycle parking and the modified access points. Therefore, subject to conditions the proposal is considered to comply with Policy SD4.

- 7.18 The disabled spaces are shown on the plans in usable places with support columns blocking access, however there would be space within the site for these spaces to be relocated taking into account the building support columns. Had the application otherwise been recommended for approval a revised more suitable parking layout could have been subject to condition.

Archaeology

- 7.19 The site lies close to an area of High Archaeological Potential and an Archaeological Desk Based Assessment has been submitted with the application. Surrey Archaeology have reviewed the Desk Based Assessment and have commented that the report has consulted with all appropriate available sources and has produced a comprehensive overview of the site and surrounding area. The report concludes that the site has a low to moderate potential for the Roman and Early Medieval periods with a low potential for the Prehistoric and Medieval. However, redevelopment of the site for the current building will have caused widespread truncation and of any archaeological horizons that may have been present.
- 7.20 Surrey Archaeology agrees that the redevelopment works, particularly the construction of the current building, will have had a destructive impact on below ground deposits and this, together with the low potential and the fact that the site is outside of the area identified as being of high archaeological potential means that it is unlikely that significant archaeological remains will be present so does not consider that it would be reasonable or proportionate to require any further archaeological works on the site. Therefore, the proposal is considered to comply with Policy EE7.

Biodiversity and Blue and Green Infrastructure

- 7.21 The applicant has provided information on blue and green infrastructure within the Planning Statement. The document states that the site is currently entirely hardstanding and given the small size and urban location there is limited opportunity to significantly improve Blue and Green Infrastructure. However, the proposals include permeable pavement for SUDS and a minimum of two small areas of landscaping. The flat roof of the first floor is also proposed to be a green roof (which is shown on the proposed plans) and bird and bat boxes can be provided at points around the building. These measures can be secured by way of condition. Therefore, the proposal is considered to accord with Policy EE9 and EE11 and guidance within the NPPF.

Contamination

- 7.22 With respect to contaminated land, a CLD Desk Study has been submitted with the application which concludes that there is little risk for contamination affecting the site, however previous use and works associated with the garage has potential for some contamination in the made ground. It is noted that this area of made ground will be removed as part of the redevelopment and therefore any contaminated material can be addressed at this stage. The Councils Land Contamination Officer has reviewed the submitted information and has recommended pre-commencement conditions for site characterisation and other matters. Subject to suitable conditions the application complies with Policy EE2 (in respect of contamination).

Other Matters

- 7.23 A Sustainability and Energy Statement has been submitted with the application. According to the Sustainability and Energy Statement submitted the low carbon and renewable energy proposed will provide carbon emission savings of 66% for the residential element and 7% for the commercial unit as part of the detailed design. In addition, the residential units will be provided with ASHP and solar panels will supply 10% of the sites energy demand in in line with the requirements of Policy SD8. In addition, the statement specifies that the water consumption will be less than 105L/pp/day. Had the scheme otherwise been considered acceptable, the renewable energy and water efficiency measures proposed could have been secured by condition.
- 7.24 Concerns have been raised regarding the impact on the proposed building on existing solar panels on neighbouring properties. It is noted that there are solar panels on the southern roof slope of Hamilton Court. It is acknowledged that the proposal will bring development closer and higher in relation to Hamilton Court which may have a negative impact on these existing solar panels. However, the limited contribution of single dwelling panels to climate change objectives does not outweigh the benefits of the proposed development to warrant refusal in its own right.

8. PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 8.1 The proposal would be CIL liable.

9. EQUALITY AND HUMAN RIGHTS CONSIDERATIONS

- 9.1 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.

10. CONCLUSIONS

- 10.1 The application has not demonstrated that there would be no alternative sites which are at a lower risk of flooding. The development is considered acceptable in terms of appearance and with no harmful impacts on residential amenities, highways safety, archaeology or contamination.

- 10.2 With regard to the planning balance whilst the proposal would provide economic benefits and contribute towards the Council's housing supply these benefits do not outweigh the flooding considerations and failure to pass the sequential test.
- 10.3 The development has been assessed against the following Development Plan policies – SD1, SD4, SD7, SD8, SL19, EE1, EE2, EE4, EE5, EE9, EE11, IE6 of the Runnymede 2030 Local Plan, the policies of the NPPF, guidance in the PPG, and other material considerations including third party representations. It has been concluded that the development would not result in any harm that would justify refusal in the public interest. The decision has been taken in compliance with the requirement of the NPPF to foster the delivery of sustainable development in a positive and proactive manner.

11. FORMAL OFFICER RECOMMENDATION

That the HoP be authorised to refuse planning permission for the following reasons:

1. The Sequential Test has not been passed as it has not been adequately demonstrated that there are no available sites at a lower risk of flooding. As such the proposal does not comply with Policy EE13 of the Runnymede 2030 Local Plan, the Runnymede SFRA and guidance in the NPPF.