

To: Planning & Regulatory Committee

Date: 7 June 2022

By: Planning Development Manager

District(s) Runnymede Borough Council

Electoral Division(s):
Foxhills, Thorpe and Virginia Water
Mr Hulley
Chertsey
Mr Nuti

Case Officer:
Janine Wright

Purpose: For Decision

Grid Ref: 503048 165679

Title: Surrey County Council Proposal RU.21/1521

Summary Report

A320 Road Guildford Road junction, Chertsey, Surrey

Highway improvements including a new roundabout, junction, access, pedestrian/cycle connections and crossings; including landscaping and associated infrastructure and engineering works.

The planning application seeks approval for highway improvement works to include a new roundabout, junction, access, pedestrian/cycle connections and crossings at the junction of Guildford Road / Green Lane / Holloway Hill (junction 6) adjacent to Salesian School.

The proposal forms part of the wider A320 corridor project to increase the capacity of the local highway network and enhance the sustainable transport infrastructure, to enable the delivery of growth in the Runnymede Borough. The proposal will be funded by Homes England's Housing Infrastructure Fund (HIF). The proposal will ensure there is extra capacity on the road network between Chertsey and Ottershaw to allow for the delivery of housing, employment and retail sites, which have been allocated within Runnymede Borough's recently adopted Local Plan. The proposal would link the road network and improve pedestrian access, traffic flow and cycle paths with the wider area.

The A320 road improvement scheme is a partnership between Runnymede Borough Council (RBC), Surrey County Council (SCC) and Homes England (HE). The project is funded through the Housing Infrastructure Fund (HIF) and aims to increase the road capacity and improve sustainable transport infrastructure to support the delivery of the Runnymede Local Plan 20230.

Junction 6 of the A320 provides a strategic link to Chertsey, Addlestone and junction 11 of the M25. The wider road network serves Runnymede's most sustainable locations for growth, east of the borough, which will benefit from the greatest concentration of services and facilities including strategic employment sites and housing.

The application has been publicised by posting site notices and an advert has been placed in the local newspaper. A total of 60 owner/occupiers of neighbouring properties were directly notified by letter and a total of eight letters of objection have been received. Multiple letters of representation have been received from local residents. These letters of objection mainly refer to the design of the scheme, flooding and the loss of trees and landscape.

The proposal is considered to accord with the relevant policies of the adopted Runnymede 2030 Local Plan and is recommended for approval, subject to planning conditions.

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Application details

Applicant

SCC Road and Transport

Date application valid

25 August 2021

Period for Determination

24 November 2021 (extension of time agreed – 30 June 2023)

Amending Documents

- Revised FRA and flood modelling submitted on 10 December 2021.
- Email dated 10/11/21 from applicant with additional information on flood modelling as requested by the EA in their objection. Revised FRA
- Flood Model information received from the applicant, Flood Risk Assessment Revision 2 dated December 2021.
- Drainage / Suds Strategy submitted by Paul Miller on 15 November ref: 10041683-ARC-HAC-PKB_JC6-RP-ZZ-00009 dated Nov 21.
- Email received from applicant on 21.6.22 regarding habitat land.
- Email received from applicant dated 21.6.22 regarding Air Quality
- Email received from applicant dated 28.6.22 regarding Noise comments
- Email received from applicant on 20.6.22 regarding EA information
- Email received from applicant dated 26.7.22 providing a revised plan for the habitat land titled Drawing 1 Proposed Habitat Creation Plan Junction 6 plan ref: 10041683-ARC-EGN-ZZ-DR-ZZ-00002 Rev 03 dated 26.07.22
- Email received from applicant dated 22.8.22 providing a response to consultee comments ref: 10041683-ARC-GEN-PKB_JC6-CO-CE-00006
- Further details on the Hydraulic model review (Jacobs no-real time) received from the application June 2022.
- Email received from applicant dated 20.6.22 attaching FEH descriptors and correspondence ref: 10041683-ARC-HAC-PKB_JC6-RP-ZZ-00015_P03 attached to email dated 23.6.22
- Email received from applicant dated 14.10.22 attaching Flood Model 7, Result 7 and Simple_model_Log
- Email received from applicant dated 23.3.23 providing a response to SUSTRAN's consultation comments.

- Email received from applicant dated 23.05.23 regarding safety checks which are to be carried out.
- Email received from applicant dated 30.05.23 attaching the Sequential test and exceptions test document ref: 10053900-ARC-EWE-J06-TN-ZZ-00001 dated May 2023.

Summary of Planning Issues

This section identifies and summarises the main planning issues in the report. The full text should be considered before the meeting.

	Is this aspect of the proposal in accordance with the development plan?	Paragraphs in the report where this has been Discussed
Principle of Development & Need	Yes	61 – 88
Design	Yes	89-99
Landscape Character and Visual Impact	Yes	100-126
Ecology, Trees and Biodiversity	Yes	127-174
Flooding and Surface Water Drainage	Yes	175-200
Heritage & Archaeology	Yes	201-227
Residential Amenity, Noise, Air Quality and Dust	Yes	228-269
Highway Capacity & Safety, Pedestrian and Cycle Access	Yes	270-292
Green Belt	Yes	293-323

Illustrative material

Site Plan

Plan 1 – Aerial view of Site

Plan 2 – Aerial view of Site

Plan 3 - Site Location Plan

Plan 3 – General Arrangement of Site

Photographs

Photographs of the application site and surrounding area

Background

Site Description

1. The A320 (Guildford Road) corridor project comprises of proposed road improvements to the A320 between Chertsey and Ottershaw to increase the capacity of the local highway network and to enhance the sustainable transport infrastructure. The wider project includes improvement works to junctions and links within the A320 corridor.
2. The application's northern extreme lies just to the north of Salesian School and extends southwards to include the junction with Green Lane and Holloway Hill. The southern extreme is the junction with Little Green Lane and its western extreme extends past Hardwick Lane and Holloway Hill.
3. The application site is approximately 2.1 hectares (ha) and includes an area of land immediately to the west of the junction with Green Lane (north of Holloway Hill). This area of land is currently in agricultural use and is separated from the highway boundary by a row of trees.
4. St Peter's hospital is located to the south of the application site and the M25 is located to the north. The application site is within the Metropolitan Green Belt and forms part of a Site of Nature Conservation Importance (SNCI). An area of high archaeological potential lies to the west and is associated with Harwich Court Farm.

Planning History

5. There are no relevant county planning permissions relating to the application site. However, the following planning history relates to applications which have been considered by the Local Planning Authority, Runnymede Borough Council.

RU.18/1279	Formation of sport pitches, associated earthworks and pavilion with associated access, car parking and landscaping – Granted
RU.19/1274	Notice of preliminary meeting for an application by ESSO Petroleum Company Limited for an Order Granting Development Consent (DCO) for the Southampton to London Pipeline Project.
RU.21/0272	Hybrid application for the land north of Green Lane, Chertsey Bittams: Full planning application for residential development comprising of 149 dwellings; informal and formal open space, footpaths, cycleways and internal road. Outline permission for provision of community centre hub and/or use of land for open space or infrastructure associated with the residential development. Outline permission for the use of the land for 5 gypsy and traveller pitches or the development of such land for approximately 11 dwellings and associated works – Awaiting decision

The proposal

6. *The application, subject to this report, relates to land at the junction of Guildford Road / Green Lane / Holloway Hill (junction 6) and adjacent to Salesian School on the A320. The proposed development is seeking to provide highway improvements including the construction of a new roundabout, junctions, access, pedestrian and cycle connections and crossings. The proposal also includes landscape works and associated infrastructure and engineering works.*

7. The highway improvements will include a new junction configuration and a new large elongated roundabout to replace the two existing smaller roundabouts. The proposal comprises of the following measures:
 - Two-lane southbound approach on Guildford Road north, Guildford Road south and Holloway Hill.
 - The two-lane southbound exist on Guildford Road includes diverge taper generated within the southeast of the roundabout. Two westbound approaches at the junction, flaring from existing single lane on Green Lane. There is a one lane exist from Guildford Road north, Green Lane and Holloway Hill.
 - A four metre wide shared use footway/cycleway around the east side of the junction has been created with uncontrolled pedestrian/cycle crossings at all desire lines and approaches to the roundabout with a proposed toucan crossing south of the junction and north of Little Green Lane.
 - There would be direct access off Guildford Road north to Salesian School and the residential property at the Lodge.

The proposed development is shown on plan ref: 10041683-ARC-GEN-PKB_JC6-DR-HE-0001 P03.

8. A new 4 metre wide shared pedestrian / cycle crossing will be constructed along the eastern side of the junction and a toucan crossing will be installed south of the junction and north of Little Green Lane.

9. Within the elongated roundabout a storage and treatment pond would be provided to intercept the flows along the watercourse located on the west side of Guildford Road. The pond, a long with raising the levels of the roundabout, should reduce the likelihood of flooding affecting the neighbouring properties and help improve water quality in the watercourse.

10. The proposal would result in the removal of some protected trees and vegetation, however, additional tree planting and landscaping has been proposed within the scheme. In addition, an area of off-site habitat land is proposed to compensate for the loss of the trees and habitats.

Consultations and publicity

District Council

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| 11. Runnymede Borough Council | No objection, subject to consideration of letters of representation, in particular the potential impact on access arrangements for occupiers of properties on Little Green Lane. |
| 12. Environmental Health | No views received. |

Consultees (Statutory and Non-Statutory)

- 7
13. County Councillor – Chertsey No views received
 14. Thames Water No objection, advice provided
 15. Environment Agency
Risk Assessment does not adequately assess the flood risk posed by the development.
6/10/22 – Objection raised, the Flood Risk Assessment does not adequately assess the flood risk posed by the development.
14/3/22 – Objection raised, further information has been requested on the hydrology review spreadsheet.
13/2/23 – Withdrawal of Objection, the fluvial flood modelling shows the proposed scheme reduces flow down Green Lane, flood risk is managed and with no increase in flood risk elsewhere. The submitted information satisfactorily addresses our concerns.
 16. Surrey Wildlife Trust
planning conditions
8/9/2021 – No objection, subject to
08/07/2022 – the compensation for the ecological impacts (permanent habitat loss) and post-development biodiversity enhancements proposed appears appropriate to the existing ecological characteristics of the site and area. More thought should be given to the use of propagation potential from the remaining SNCI, rather than importing foreign seeding material. The Hardwick Fields SNCI will have significant botanical enhancement potential in terms of habitat and/or condition that ought to be realised as an aim and outcome of this proposal.
 17. County Ecologist
for a Construction and Environmental Management Plan and Landscape and Ecology Management Plan. No objection, subject to conditions
 18. County Archaeological Officer No objection, subject to conditions
 19. County Arboriculturalist No objection, subject to conditions
 20. Rights of Way No views received
 21. Natural England No comments, advice provided
 22. Environmental Assessment No views received
 23. Highways Agency No comments, advice provided
 24. County Historic Listed Buildings Officer
material impact on the special interest of the listed buildings. No objection, there will be no
 25. SuDS & Consenting Team No objection, subject to conditions
 26. SCC Emergency Planning No views received
 27. County Noise Consultant No objection, subject to conditions
 28. County Air Quality Consultant No objection, subject to conditions
 29. Esso Petroleum Company Ltd No views received

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|------------------------------------|---|
| 30. The Crown Estate Commissioners | No views received |
| 31. County Landscape Architect | No objection, subject to conditions |
| 32. Transport Development Planning | No highway requirements, the project will need to apply the same processes and procedures as those carried out by a private developer in relation to the detailed design and ensuring the safety of the scheme. |
| 33. Sustran | No objection, advice provided |
| 34. Cycle UK | No views received |
| 35. Ottershaw Village Hall | No views received |
| 36. Hillswood Business Park | No views received |
| 37. Chertsey Driving Test | No views received |
| 38. Meath Green Infant School | No views received |
| 39. Ottershaw Junior School | No views received |
| 40. Ottershaw Infant School | No views received |
| 41. Meath Green Junior School | No views received |

Amenity Groups

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| 42. Ottershaw and West Addlestone Residents | No views received |
| 43. Ottershaw Neighbourhood Forum | No views received |
| 44. Surrey Chambers of Commerce | No views received |
| 45. East Surrey Rural Transport Partnership | No views received |
| 46. Christ Church Ottershaw | No views received |
| 47. Ottershaw Society | No views received |
| 48. The Chertsey Society | Objection, opportunities have not been taken to address dangerous turning at Little Green Lane / Guildford Road, despite requests by local residents. Traffic backs-up onto the roundabout from stationary traffic in Chilsey Green Road preventing access to Thorpe Road. |
| 49. Surrey Access Forum | No views received |
| 50. Foxhills Club and resort | No views received |

Summary of publicity undertaken and key issues raised by public

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| 51. The application was publicised by the posting of 6 site notices and an advertisement was placed in the local newspaper. |
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52. A total of 60 owner/occupiers of neighbouring properties were directly notified by letter. Eight letters of objection have been received.
53. The following concerns have been raised within the letters of objection: -
- Loss of Trees and open space
 - Noise
 - Traffic
 - Water course implications
 - Congestion and traffic flow
 - Flooding
 - Pedestrian safety and school crossing
 - Design of scheme
 - Environmental pollution

Officer's comments are as follows:

Flooding:

A revised Flood Model and Flood Risk Assessment (FRA) has been submitted and reviewed by the Environment Agency (EA). The EA are satisfied with the additional information provided and have removed their objection to the proposal.

Design of scheme:

Safety audits will be undertaken to ensure that the HIF scheme meets road safety standards.

54. Officers have reviewed all the representations which have been submitted.
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Planning considerations

Introduction

55. The guidance on the determination of planning applications, found at the end of this report, is incorporated into this report and must be read in conjunction with the following paragraphs.
56. In this case the statutory development plan for consideration of the application consists of the Runnymede Borough Council 2030 Local Plan which was adopted in July 2020 (RBLP), Runnymede Infrastructure Delivery and Prioritisation SPD and National Planning Policy Framework (NPPF).
57. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations. In assessing the application against development plan policy it will be necessary to determine whether the proposed measures for mitigating any environmental impact of the development are satisfactory. In this case the main planning considerations are: Principle of Development, Need, Highway capacity and safety, Design, Heritage, Visual Impact and Landscape, Flood Risk, Ecology and biodiversity, Residential Amenity, noise and vibrations, Air Quality and Green Belt.

ENVIRONMENTAL IMPACT ASSESSMENT

58. An Environmental Impact Assessment (EIA) screening request was submitted to the County Planning Authority on 1st April 2021 on behalf of the applicant.
59. The proposal has been screened under Regulation 6 of the EIA Regulations Schedule 2 (paragraph 10(f) (Construction of roads (unless included in Schedule 1)) and 13(b) (Changes or extensions to Schedule 2 development)). Based on the information provided, the EIA Officer has concluded there are unlikely to be significant effects on the environment of a type or scale that would warrant classification of the scheme as a whole or of any individual element of the scheme as an “EIA Development”. The proposal therefore does not require an Environmental Statement to accompany it.

SOUTHAMPTON TO LONDON PIPELINE - NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECT (NSIP)

60. The Southampton to London aviation Pipeline is located north of the application site, outside the application boundary. The County is bound by agreement not to approve any developments that may compromise or hinder the agreed pipeline and access routes. Fisher German, on behalf of Esso Petroleum, were consulted on the application and confirmed that the proposal would not have an impact on the proposed NSIP.

PRINCIPLE OF DEVELOPMENT AND NEED

Runnymede Borough Council Local Plan 2030 (adopted July 2020)

Policy SD1: Spatial Development Strategy

Policy SD2: Site Allocations

Policy SD3: Active and Sustainable Travel

Policy SD4: Highway Design Considerations

Policy SD5: Infrastructure Provision and Timing

Surrey County Council Local Transport Plan (LTP4): Major Projects

Supplementary Planning Document – Infrastructure Delivery and Prioritisation (Nov 2020)

National Planning Policy Framework 2021

Paragraphs 11, 20(b), 22 and 106(b)

61. The A320 scheme is a partnership between Runnymede Borough Council (RBC), Surrey County Council (SCC) and Homes England (HE). The project is funded through the Housing Infrastructure Fund (HIF) and aims to increase the road capacity and improve sustainable transport infrastructure to support the delivery of the Runnymede 2030 Local Plan.
62. Junction 6 of the A320 provides a strategic link between Chertsey and junction 11 of the M25. The A320 road network serves Runnymede’s most sustainable locations for growth in the Borough, which will benefit from the greatest concentration of services and facilities including housing and employment.
63. Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. For decision taking this means approving development proposals which accord with an up-to-date development plan without delay. The Runnymede 2030 Local Plan was adopted in July 2020 and is thus considered to be an up-to-date development plan. The housing needs identified within the plan along with the proposed highway improvement works at junction 6 of the A320, and the wider A320 corridor, are considered to deliver the development plan needs for the area.
64. A previous planning application for road improvement works to junction 10 (Ottershaw Roundabout) was approved in July 2022. The application reference number is GU.21/2018.

65. Paragraphs 20(b) and 22 of the NPPF state that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for infrastructure for transport. Strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
66. Paragraph 106(b) of the NPPF further states that planning policies should be prepared with the active involvement of local highway authorities, other transport infrastructure providers and operators so that strategies and investments for supporting sustainable transport and development patterns are aligned.
67. The proposed highway improvement works to the junction and link roads are considered to be essential to delivery of approximately 3,500 new homes across 10 sites in and around the Chertsey and Ottershaw areas. New supporting infrastructure is therefore required in order to meet the housing needs in the borough and deliver the Runnymede 2030 Local Plan
68. The Runnymede Infrastructure Delivery and Prioritisation Supplementary Planning Document (RIDP SPD) sets out the Runnymede Borough Council's approach to infrastructure delivery and funding. The SPD categorises the infrastructure into different prioritisation levels including critical, essential, high priority and desirable infrastructure. Critical infrastructure is required in order to enable identified growth. Without critical infrastructure the development process cannot proceed, and the Runnymede Borough Local Plan (RBLP) cannot be delivered. The proposed highway improvement works to junction 6 of the A320 and the wider A320 corridor have been identified within the SPD as being critical.
69. Paragraph 2.4 and table 2-2 of the RIDP SPD states that the A320 road improvement scheme (including the A320 corridor) and M25 junction 11 improvements are 'critical' infrastructure. The paragraph further sets out that the *"improvement scheme is required to enable a number of development sites allocated in the Local Plan which are dependent upon the improvements proposed, to come forward."* The delivery of the A320 road scheme has been secured through a Housing Infrastructure Fund (HIF) grant from Homes England. Thus enabling early delivery of the A320 road work improvements.
70. Paragraph 3.43 of the RIDP SPD states that the Borough Council have prepared evidence specific to the A320 corridor which shows that without the mitigation the A320 will suffer 'severe' impacts as a result of growth set out in the Local Plan.
71. The adopted RBLP seeks to achieve a balance between protecting the borough's heritage, natural environment and built environment whilst allowing for new housing and creation of job opportunities and economic development.
72. Several rounds of public consultations were carried out during the development of the Local Plan and more than 6000 representations were received from local residents, businesses and other organisations. The plan was publicly examined and endorsed by an independent government-appointed inspector, subject to a number of modifications being made, all of which were accepted by local district councillors.
73. Policy SD1 of the RBLP refers to identified housing and economic provisions over the Local Plan period and states that development will be largely directed towards the most sustainable, larger settlements in the Runnymede Borough and towards the garden village at Longcross. These locations have been identified as being the best locations for delivering supportive infrastructure as well as active and sustainable travel choices.
74. Policy SD2 of the RBLP lists the allocated sites outlined for development within the Borough. Out of the 24 sites allocated for development within the Borough, 11 are dependent on the delivery of necessary mitigation on the A320 road network. RBC consider that the allocated sites, set out within

the policy, are the most suitable site for development when considered against the alternatives appraised through a robust site selection process and sustainability appraisal. The allocated sites are considered to offer the best opportunities to achieve sustainable development as well as the delivery of the spatial development strategy.

75. The proposed residential development, set out within policy SD2, would result in an increase in travel demand in future years, intensifying existing congestion problems and increasing travel demand along the A320 corridor. Paragraph 5.42 of the RBLP recognises that there are a number of existing transport and infrastructure concerns within the Borough, including congestion on key transport routes including the A320, infrequent bus services and limited connectivity by walking/cycling routes in some areas. Paragraphs 5.49 and 5.50 further recognise that growth will lead to impacts on the road network and that a number of locations along the A320 will require some form of intervention to ensure that congestion is managed and that site allocations, within the plan, can be delivered sustainably.
76. Policy DS3 of the RBLP states that working with stakeholders, the Council will support schemes and development proposals which enhance the accessibility and connectivity between people and places by active and sustainable forms of travel. This can be achieved by:
- Supporting and implementing the objectives and strategies of the Surrey Local Transport Plan, strategies and projects prepared by Transport for the South East or agreed under the Duty to Cooperate, and schemes which help to alleviate existing transport and highway problems in Runnymede or the wider area as identified through further partnership working;
 - Refusing planning permission for any development which would compromise the delivery of the mitigation works required to the A320 and/or M25 junction 11.

Sub-paragraph 5.57 of the RBLP, refers to a number of congestion 'hot spots' and highway issues within Runnymede, with reference made to the A320. The paragraph further states that "it is therefore considered necessary to include a policy which reiterates the Council's intention to continue to work with its partners to achieve modal shift and to set out measures which support and achieve active and sustainable travel choices and require developers to explore these opportunities through travel plans".

77. The Surrey County Council Local Transport Plan (LTP4) seeks to improve and make routes safer for walking and cycling. The LTP4 includes a number of proposals to deliver wider ranging improvements for cleaner, healthier and safer transport in Surrey.
78. The proposal would allow for improved connectivity for current and future road users and would result in improved traffic flow, highway safety measures and pedestrian and cycle connectivity, delivering the objectives of the LTP4.
79. The highway improvement works along junction 6 and the wider A320 corridor have been identified as being critical to the delivery of housing and economic development within Runnymede. The proposal would enable infrastructure improvements to alleviate existing transport and highway problems within the Borough as well as support economic and housing development.
80. Policy SD3 of the RBLP states that the Council will support schemes and development proposals which enhance the accessibility and connectivity between people and places by active and sustainable forms of travel. The policy further states that planning permission should be refused for any development which would compromise the delivery of the mitigation works required to the A320 and/or M25 Junction 11. The policy has recognised the need for mitigation works to be carried out along the A320 corridor and further states that planning permission should be refused for any development which compromises the delivery of these mitigation works.

81. Policy SD4 of the RBLP states that development proposals which maintain or enhance the efficient and safe operation of the highway network will be supported. The needs of all highway users for safe access, egress and servicing arrangements will be supported.
82. The proposed development has been designed to a high standard to ensure efficient and safe operation of the highway network. The proposal would increase capacity on the local highway network and enhance sustainable transport infrastructure, to enable the delivery of growth. It would also promote improved pedestrian and cycle connections for all road users.
83. Policy SD5 of the RBLP states that working with infrastructure providers, developers and other key stakeholders, Runnymede Borough Council will support infrastructure projects which deliver the spatial development strategy and allocated development sites as identified within the Local Plan. The proposal would enable economic and housing opportunities within the Borough, delivering improvements to the local infrastructure network which are critical to the successful delivery of the spatial development strategy.

Conclusion of principle of development and need

84. The principle of the highway improvement works and creation of a new roundabout and junctions for local residents and road users within the immediate and wider area of Runnymede are supported by policies SD1, SD2, SD3, SD4 and SD5 of the adopted RBLP and the infrastructure delivery and prioritisation supplementary planning document (SPD). The RBLP recognises that for the allocated sites and housing development proposals to be delivered, highway improvement measures to the A320 corridor (including the application site) are necessary.
85. The final design alignment is compliant with the Design Manual for Roads and Bridges (DMRB)¹ for vehicle types and radii of curves and junctions.
86. The proposal is likely to bring benefits such as improved highway safety, a reduction in congestion, the delivery of sustainable transport infrastructure and residential and economic growth within the Borough. Given that the proposal is located within an urban area and the road network is largely existing, the principle of development has already been accepted and must be given the necessary weight in the assessment.
87. On balance the proposal would accord with policies SD2, SD3, SD4 and SD5 of the Runnymede 2030 Local Plan and paragraph 20(b), 22 and 106(b) of the NPPF.
88. Notwithstanding the above, it is acknowledged that the proposal is within a sensitive location which is close to existing residential development, local flood zones, heritage assets, ecological and landscape impacts as well as the designated Metropolitan Green Belt. All these impacts will be considered in more detail within the report.

DESIGN

Runnymede Borough Local Plan 2030

Policy SD4 – Highway Design Considerations

Policy EE1 – Townscape and Landscape Quality

National Planning Policy Framework 2021 – paragraph 132

89. The application is accompanied by a Planning Statement (PS) and Transport Assessment (TA) which provides details of the design associated with the project.

¹ Standards For Highways – Design Manual for Roads and Bridges (DMRB)

90. The PS states that in formulating the scheme the following design principles were taken into account:-
- A design that reflects the location and aims to improve traffic capacity and journey times;
 - Delivery of development growth to meet current and future demands of the area (including housing and economic benefits to the Borough);
 - Keeping vehicle speeds at a reduced level, reducing the severity of road traffic collisions and providing more free-flowing arrangements to reduce queuing impacts;
 - Ensuring that the scheme design takes account of the needs of all road users, including pedestrian and cyclists;
 - Minimising the impacts on nearby residential properties and heritage assets and providing improved surface water drainage provisions.
91. The size and layout of the new junctions and roundabout have been designed in accordance with the DMRB as well as the functional and practical requirements of all road users.
92. The PS further states that the design process associated with the project sought to provide essential capacity upgrades in support of the wider A320 HIF scheme (North of Woking packages of work, in support of National, Regional and Local policies for the benefit of all road users). Consideration has been given to:-
- Minimal impacts on the Green Belt utilising as much of the existing highway as possible
 - Vehicle movements
 - Providing appropriate facilities for pedestrians and cyclists
 - Noise and other environmental impacts
 - Landscaping
 - Sustainable Drainage
 - Street Lighting
93. Policy EE1 of the RBLP states that all development proposals will be expected to achieve high quality and inclusive design which responds to the local context including the built, natural and historical character of the area, while making efficient use of the land.
94. Policy SD4 of the RBLP states that 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 will be supported.
95. The location of the new junction has sought to include existing carriageways and where possible incorporating new and existing landscaping within the roundabout and adjacent areas. It has been designed in a sensitive manner seeking to avoid impacts on heritage assets, residential properties, existing vegetation and the openness of the Green Belt.
96. Paragraph 132 of the NPPF states design quality should be considered through-out the evolution and assessment of an individual proposal. Early discussions between applicants, local planning authority and local community about the design and style of emerging scheme is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications which can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.
97. The applicant has engaged in early discussions and public consultations with local residents, businesses and the planning authority. The proposal was submitted following a number of public consultation which commenced in February 2021. The applicant has

given consideration to all the comments received and is continuing to engage in discussions with residents and public representatives as well as updating the web platform².

Conclusion of design

98. The proposal has been designed to a high quality incorporating an inclusive design which responds to the local context within the built and natural environment. The design of the roundabout and junction is considered to meet the requirements of all road users and is an inclusive design which responds positively to the surrounding area.
99. The proposal is therefore considered to be in accordance with policy EE1 of the RBLP and paragraph 132 of the NPPF.

LANDSCAPE CHARACTER AND VISUAL IMPACT

Runnymede Local Plan 2030

Policy EE1 – Townscape and Landscape Quality

National Planning Policy Framework 2021, paragraph 174 and 180

100. Policy EE1 of the RBLP states that development proposals will be expected to achieve high quality and inclusive design which responds to the local context including the built, and natural characters of the area while making good use of the land. Development proposals will be supported where they contribute to and enhance the quality of the public realm and/or landscape setting through high quality and inclusive hard and soft landscaping schemes. Implemented through an appropriate landscaping strategy which takes account of existing and proposed landscape character and features.
101. The application site lies partly within the Trumps Green to New Haw Settled and Wooded Sandy Farmland Landscape Character Area (LCA). The eastern part of the site is not within a landscape character area as it forms the edge of a built-up area (Chertsey South).
102. The key landscape features surrounding the site include the mature roadside oak trees lining the A320. The oak trees are subject to a Tree Preservation Order (TPO) and they visually enclose the road and contribute positively to the visual amenity and overall landscape character. Immediately to the west of the A320 (junction 6) is Hardwick Court Fields SNCI which is valued for its semi-improved mesotrophic grassland.
103. The proposed development is seeking to increase the vehicular capacity along the A320 Guildford Road and wider A320 corridor. The proposal involves the construction of a new junction configuration including a larger roundabout to replace the existing two smaller roundabouts.
104. The applicant has submitted a Landscape Assessment (LA) in support of the application. The LA has identified the significance of the changes, resulting from the proposed scheme, on the landscape features, including trees and visual amenity.

Landscape Character

²Community Forum – A320 North Of Woking Improvements – Commonplace
<https://a320.commonplace.is/>

105. The key direct effects of the proposed development on the landscape character include the removal of trees (subject to tree preservation orders), sections of hedgerow and grassland.
106. The proposed expansion would occur to the west of Guildford Road and would result in the loss of vegetation. The design of the junction has taken into account the need to incorporate the new road layout into the surrounding landscape, through sensitive design, retention of trees and hedgerows where possible. It is however noted that trees subject to a tree preservation order (ref:TPO433) will be removed as part of the proposed works along with the loss of an area of grassland within the Hardwick Court Fields SNCI.
107. The proposed roundabout, is to be located west of the existing roundabout, resulting in the loss of 1 tree subject to a TPO (Category A); 12 individual trees and part of one group of trees (Category B); 20 individual trees (Category C); partial removal of hedgerow (Category C) and grassland. Proposed mitigation measures include the retention of mature oak trees within the new roundabout, together with extensive new tree and shrub planting within and alongside the roundabout.
108. The new junction has a larger footprint than the existing roundabout. The proposed design would result in the partial removal of the existing tree belt, along the western boundary. The interface with the housing along the eastern boundary would be generally unchanged although there are some localised changes proposed.
109. The applicant is proposing a planting scheme which would ensure that the adverse impacts of the tree removal would be mitigated in the medium to long term. Where possible the applicant has sought to retain existing trees and hedgerows. A detailed landscaping plan will be submitted to the County Planning Authority for consideration and this is to be secured via a planning condition. The landscaping proposal would ensure that the appropriate landscaping is put in place and suitably maintained to compensate for the loss of existing vegetation and habitats. All mitigatory planting and landscaping works would be protected for a period of 5 years after the construction works.
110. The applicant has also submitted an outline Landscape and Ecological Management Plan (OLEMP) as part of the application. The OLEMP provides an overview of how the new planting scheme, including the retention of existing vegetation, will be managed once the junction is operational. Off-site planting will also be provided on a separate parcel of land, outside of the application redline boundary, and will include the plantation of a native broadleaved woodland and native wildflower grasslands. The submission of the LEMP would be secured by planning condition.
111. The proposed planting within the application site includes:
- Salesian School – new planting of hedgerow to match existing along the frontage
 - Green Lane Junction – planting of new shrubs and trees
 - Rear of Brentlands Road – retain and improve on existing vegetation
 - South of junction (White Lodge Centre) – to increase vegetation to provide additional screening
 - New Roundabout – retain and replant new trees, planting of rich grassland to maximise biodiversity
 - North side of Holloway Hill – retain and manage vegetation
 - West side of junction – new replacement planting
 - West side of A320 – retain trees and reinforce existing scrub with new shrub planting.
112. Officers recognise that the proposed development would cause harm to the landscape character within the short to medium term. The adverse impacts would be as a result of the loss of trees and roadside vegetation as well as the construction phase and the initial operational years, whilst the replacement landscape planting matures. Whilst there would be a loss of trees and vegetation and an increase in the urban features, as a result

of the built form, over the long-term these features would be softened by the landscaping.

113. On balance, the landscape character would be re-established once the new planting has matured and the construction works have been completed. Where possible new tree planting will include native species and a maintenance plan will ensure that the planting is appropriately maintained. Over the long-term the roadside character would be reinstated reducing the impact on the landscape character of the area, encouraging biodiversity opportunities.
114. The County Landscape Architect (CLA) has been consulted on the proposal and has raised no objections. The officer has noted that over the long term the proposed new planting would help re-establish the roadside character and the off-site planting would be compensatory for the loss of the grassland at Hardwick Court Fields SNCI.
115. The CLA is in agreement that the loss of mature trees would have a localised slight adverse effect on the landscape character, however, this would not significantly alter the wider local landscape character which remains heavily wooded and enclosed.
116. Whilst the proposal would result in the loss of vegetation the applicant has sought to minimise the impact by retaining trees, hedgerow and shrubs, through the design and positioning of the new junction. Furthermore, the proposed landscaping (hard and soft) would be of a high quality, providing enhancements to pedestrians and road users over the medium to long term, once the planting has established.

Visual Amenity

117. The application site is surrounded by built form, including Salesian School and residential properties along the eastern and southern boundary and Salesian's school sports pitches to the north-west. An open area of grassland (Hardwick Court Fields) is located to the north-west. The nearest residential properties impacted by the proposal are The Lodge, Brentlands Road and Green Lane.
118. The Landscape Assessment (LA) has identified a number of visual receptors that may experience changes in their views or visual amenity as a result of the construction and operational phases. These include:-
 - Salesian School
 - White Lodge Centre
 - Hardwick Court Farm SNCI
 - Pedestrians using the junction
119. In addition to the above receptors, officers have identified that vehicle users would be impacted by the proposal. These receptors are likely to experience a low to medium sensitivity as their primary focus would be on the highway. However, the surrounding area would be within close proximity and the proposed changes to the roundabout would be noticeable. Overall the visual effects on vehicle users are likely to be slight to moderate adverse, in the short to medium term whilst the replacement planting matures.
120. The LA states that replacement planting would partially mitigate the loss of the trees and vegetation over the long-term, however, it is accepted that there would be an adverse effect on the receptors, as mentioned above, in the short to medium term until the landscaping has matured.
121. In relation to the construction phase, the impacts on the receptors identified above would be short-term and temporary in nature with short-term adverse effects on road users, pedestrians, pupils at Salesian School and local residents. The likely impacts would be as a result of noise and visual intrusion of machinery and plant equipment, as well as the

removal of existing vegetation. These impacts are considered to gradually reduce over time as the construction works are completed and the planting matures.

122. Officer consider that the visual impacts as a result of the machinery, plant equipment and construction vehicles could be minimised though mitigation measures contained within a Construction Environmental Management Plan (CEMP) which is to be secured via a planning condition.
123. The CLA has reviewed the LA and has concluded that the proposed development is likely to result in some adverse landscape and visual effects at a localised site level. However, this will reduce as the new planting matures and becomes more established. The officer has raised no objection to the proposal subject to the inclusion of planning conditions.

Conclusion of landscape character and visual impact

124. Overall the applicant has taken into account the need to incorporate the proposal into the surrounding landscape through sensitive design, retention of trees and hedgerows (where possible) and improved landscaping. High quality soft and hard landscaping would seek to enhance the setting and once mature the planting would integrate into the surrounding area.
125. Whilst the proposal would alter the landscape character within the immediate locality of the application site, it would not have a significant adverse effect on the wider landscape character of the area. Officers also accept that the consequence of constructing a major new piece of infrastructure would result in the loss of some trees and local vegetation.
126. Officers are satisfied that mitigation measures including a landscaping scheme and CEMP would mitigate any harm caused and would enable the delivery of a high quality proposal with public benefits. The proposal is considered to comply with policies EE1 of the RBLP.

ECOLOGY, TREES AND BIODIVERSITY

Runnymede Local Plan 2030

Policy EE9 – Biodiversity, Geodiversity and Nature Conservation

National Planning Policy Framework 2021 – paragraph 174

127. Paragraph 174 of the NPPF requires that planning decisions contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity.
128. Policy EE9 of the RBLP states that development on important sites in the Borough will need to pay particular attention to the requirements of the policy. This policy sets out a number of criteria of which points 4 and 5 are relevant to this proposal. Point 4) refers to trees protected by Tree Preservation Order and point 5) refers to Sites of Nature Conservation Importance (SNCI). The policy seeks to achieve net gains in biodiversity through creation / expansion, restoration, enhancement and management of habitats and features to improve the status of priority habitats and species. Development proposals should demonstrate how this will be achieved.

Ecology

129. The applicant has submitted an Ecological Impact Assessment incorporating a preliminary ecological assessment (PEA) and Ecological Mitigation strategy (EMS) in support of the application. The PEA was undertaken across the site to identify and describe all potentially significant ecological effects associated with the proposed development and to identify mitigation measures to make the proposed development acceptable.

130. There are several ecological designations in close proximity to the application site. These include:
- South West London Waterbodies SPA and Ramsar site within 2km to the north of the site.
 - Thames Basin Heath SPA within 3.8km south west of the site.
 - Thursley, Ash, Pirbright and Cobham SAC within 3.8km to the south of the site.
 - Thorpe Park Gravel Pitt SSSI is approximately 2km to the north of the site.

SNCI – Harwick Court Farm Fields

131. A Site of Nature Conservation Importance (SNCI), The Hardwick Court Farm Fields (SNCI), is partly within the application site boundary and is situated north west of the Guildford Road / Holloway Hill junction. The habitats within the SNCI include grassland and alder woodland.
132. The PEA has identified several habitats which are present within the site and considered to be important ecological features. These consist of woodland and parkland, scattered broad-leaved trees, grassland, tall ruderal herbs, amenity grassland and hedges. The PEA has also identified a number of protected species which could be affected by the proposal including reptiles, birds, bats and other mammals.
133. The PEA states that approximately 0.01ha of semi-natural mixed woodland and 0.01ha of broadleaved plantation will be permanently lost as a result of the proposed development. These areas will be immediately adjacent to the existing carriageway.
134. Approximately 0.5ha of semi-improved neutral grassland within the Hardwick Court Farm Fields (SNCI) will be permanently lost as a result of the proposed development.
135. The construction works may also have an indirect impact on the habitats within and surrounding the application site. However, it is unlikely that there would be any operational impacts as a result of the proposal, as the existing carriageway already borders the site.
136. The PEA outlines mitigation measures for the loss of the habitat and states that the native broadleaved woodland habitats will be planted beyond the site boundary on land which is leased by Surrey County Council. The proposed mitigation planting would enable the applicant to secure a biodiversity net gain. Additional scattered trees would be planted within the application site along verges and land boundaries.
137. In relation to scattered trees, an area of approximately 0.14ha would be removed by the proposed works, however, new tree planting is proposed to mitigate this. It is proposed that 60 native broadleaved trees will be planted within the site and on the land beyond the application boundary. The landscaping and tree planting is to be secured by planning condition.
138. Species rich hedges with trees are located within the fields to the north west of the A320 Guildford / Holloway Hill junction and bordering the west verge of the A320. These hedgerows amounted to 0.35km in length and were surveyed in March 2021 to determine whether they qualified as 'Important Hedgerows' under the Hedgerow Regulations 1997. One hedgerow was classified as 'Important Hedgerow'. The applicant has sought to provide species rich hedgerow and trees on land beyond the application boundary and this will be secured by a planning condition.
139. Around half of the species-rich hedges and trees, within the application site boundary, will be removed and not replaced, however, off-site mitigation would be provided beyond the application site boundary on an area of land leased by SCC.

140. The proposed development would result in both short term impacts and long term changes to the habitats and ecological features identified. The short term impact on habitat would be as a result of the construction phases of the proposal including vegetation clearance, use of machinery, removal of trees and hedgerows, noise and lighting as well as general disturbances. The impacts on the ecological features include habitat loss to woodland, scattered broadleaved trees, dense shrub and hedgerows, impacting reptiles, birds, bats and other mammals. Incidental mortality and disturbances were considered possible during the construction phases for all fauna.
141. The PEA has identified that trees within the application site could provide bat habitats. Of the thirty-three trees surveyed, thirty were assessed as having a negligible level of suitability for roosting bats. A small number of trees were assessed as having a low level suitability. Of the remaining trees surveyed, no roosts or evidence of roosting were recorded in any of the trees scheduled to be removed, however, the presence of such roosts has nonetheless not been disproven. Therefore, the site has been valued on a precautionary basis.
142. The PEA concluded that whilst no bat roosts or evidence of roosts have been recorded within the trees which are to be removed, the application site has been assessed as being a local value to roosting bats and that tree removal would present some potential impacts to roosting bats, such as:-
- Killing or injury to small numbers of non-breeding roosting bats during tree felling operations - medium impact.
 - Accidental removal of individual roosts by tree-felling operations – medium impact.
 - Disturbance of individual bats occupying roosts at the time of tree works – low impact.
143. The loss of bat foraging and commuting habitats, such as hedge and tree lines and semi-improved neutral grassland, is considered a negligible impact due to small areas impacted and compared to the wider foraging and commuting areas used by bats. All site clearance and construction works should therefore adhere to a sustainable bat mitigation strategy.
144. No records of reptiles were recorded within 2km of the application site. Areas of unmanaged grassland within the survey area were limited and mainly associated with road verges. These areas provide suitable basking and foraging habitats for small numbers of common reptile species. However, due to the presence of the dual carriageway roads, habitats present, limited connectivity and lack of records the site was considered negligible value for reptiles.
145. With regard to birds, the removal of approximately 0.15ha of woody vegetation has the potential to cause damage to nests and/or eggs. The works to the Hardwick Court Farm Fields (SNCI) and the loss of approximately 0.5ha of grassland could damage the nests of ground nesting birds. The removal of nesting habitats is considered to be a negative impact for bird nesting and foraging until replacement planting is established (within 10 years of planting). The PEA has recommended that the vegetation clearance works within the grassland areas would be undertaken outside of the core bird nesting season (March to August inclusively). If this is not possible it is recommended that checks for nesting birds be undertaken by an experienced ecologist prior to commencing works. If an active nest is found, a suitable stand-off area should be maintained until the young have fledged. To mitigate any loss of bird nesting habitat, the applicant has proposed the planting of scattered trees, scrub and species-rich grassland within the site and on land leased by Surrey County Council (outside of the application site boundary).
146. With regard to badgers, they are mobile species and setts may be established prior to site clearance. It is a criminal offence under the Protection of Badgers Act 1992 to disturb, harm or destroy badger setts and such as precautionary mitigation would be

required. Pre-work checks for evidence of badgers would be undertaken by an experienced ecologist. If located a licence from Natural England would be required.

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147. With regard to mammals, wooded areas within the application site offer overwintering, foraging and commuting habitats for hedgehogs. The loss of a proportion of this habitat would have minor adverse impacts for hedgehogs. Areas of dense vegetation would be checked for hedgehogs prior to site clearance works. Excavations during the construction works would be covered up at night to ensure that hedgehogs and other animals do not become trapped should they fall in.
 148. Officers acknowledged that there would be some loss of habitat as a result of the construction works, however, the applicant has proposed mitigation measures such as habitat creation both within the application site and elsewhere. The habitat creations include both mitigation and enhancement of biodiversity net gain aiming to achieve a 20 units gain, as defined by the Defra metric. Further enhancement measures include the provision of artificial bird and bat boxes and the creation of habitat features and shelters such as log piles and hibernacula to provide features suitable for reptiles, hedgehog and small mammals.
 149. The County ecologist has reviewed the submitted ecology information and is satisfied with the documents submitted. No objections have been raised to the proposal, subject to the inclusion of a planning conditions requiring the submission of an Ecological Mitigation plan, to ensure that the ecological mitigation strategy is implemented. The County Ecologist has also requested a planning condition for the submission of a Landscape and Ecology Management Plan (LEMP). The LEMP is to provide details of the location and type of habitat creations both within the site and beyond the application boundary as well as information on how these habitats will be managed and maintained.
 150. Officers recognise that the proposed development would result in the loss of habitats within designated sites. However, the potential adverse impacts can be mitigated through the addition of planning conditions. Furthermore, the applicant is proposing to provide habitat enhancements on land outside of the application boundary. Therefore, officers are satisfied that the requirements in respect of the identified species and protection of habitats have been met.
 151. The proposal is considered to accord with policy EE9 of the RBLP and paragraph 174 of the NPPF.

Trees

152. An arboricultural impact assessment (AIA) has been submitted in support of the application.
153. The AIA has identified and evaluated the direct and indirect impacts on existing trees as a result of the implementation of the proposed development. A total of 133 arboricultural items were recorded within the study area, these include:-
 - 126 individual trees
 - 5 groups of trees
 - 3 hedges
154. The AIA has identified that tree removal will be necessary in order to implement the proposal. The trees to be removed are as follows:-
 - 1 high quality tree (category A);
 - 12 individual trees, part of one group of trees graded moderate quality trees (category B)

- 20 individual trees, partial removal of two hedges of low quality (category C)
 - 2 trees have been categorised as unsuitable for retention regardless of the site proposal (category U)
155. It is confirmed that a group of trees within the woodland area and two individual trees, located west of Guildford Road are subject to a tree preservation order. The TPO reference numbers are (Ref: TPO433) and (Ref: TPO3) respectively.
156. A group of trees along the eastern boundary of Guildford Road parallel to Green Land are also subject to a TPO (Ref: TPO37), however, these trees are outside of the application site boundary.
157. Paragraph 059³ of the NPPG explains that anyone wanting to cut down, top, lop or uproot trees subject to a TPO must apply to the local planning authority for its consent unless the proposed works are except through an exemption. Exemptions are listed in Paragraph 14 of the Town and Country Planning (Tree Preservation)(England) Regulations 2012 one being (vii) "*so far as such work is necessary to implement a planning permission*". As such, should planning permission be granted for this development, this would constitute an exception under these regulations.
158. To mitigate the loss of the trees, hedgerow and part of the woodland, the applicant has proposed replacement on-site and off-site planting. The location of the off-site provision are shown on Drawing 2 proposed habitat creation plan junction 6 100416383-ARC-EGN-ZZ-DR-ZZ-00008 Rev 01 and drawing 2 proposed habitat creation plan junction 6 ref: 100416383-ARC-ENG-ZZ-DR-ZZ-00009 Rev 01. The proposed landscaping (soft and hard landscaping) will be secured via a planning condition to ensure that suitable native species and plant sizes are introduced.
159. The AIA has also identified that construction works will take place close to or within the root protection areas and canopies of retained trees. Suitable tree protection measures, such as protective fencing will be installed to ensure that the existing and retained trees/hedges are adequately protected during the construction works. Details of the tree protection measures shall be secured by a planning conditions.
160. The County Arboricultural Officer (CAO) has reviewed the submitted documentation and has raised no objections to the proposal, subject to appropriate planning conditions.
161. The CAO has commented that the "*applicant has tried to retain as much ground vegetation and tree cover through careful design/layout of the roundabout and side roads*". "*the direct tree loss as a result of the proposed development could be mitigated by replanting and improved biodiversity net gain*".
162. The applicant will be required to submit a soft and hard landscaping scheme which will be reviewed by the CPA in association with the CAO and County Landscape Architect. The submitted scheme should include details of the species, plant sizing and an appropriate maintenance scheme. It is proposed that all new planting/replacement trees would be safeguarded for a period of 5 years. This will be secured by planning condition.
163. An appointed highway contractor would be responsible for the maintenance programme and upkeep for both on-site and off-site landscaping and biodiversity provisions for an agreed period. Thereafter, SCC would be responsible for the maintenance and upkeep of the planting.

³ Paragraph: 059 Reference ID: 36-059-20140306

164. Policy EE8 of the RBLP refers to biodiversity, geodiversity and nature conservation. The policy states that development on or adjacent to the sites of nature conservation importance (SNCI) in the borough will need to pay particular attention to the requirements of the policy. It further states that the Council will seek net gains in biodiversity, through creation/expansion, restoration, enhancement and management of habitats and features to improve the status of priority habitats and species. Development proposals should demonstrate how this will be achieved. For development proposals that affect national, regional or locally protected sites not forming part of a Ramsar, SPA or SAC, permission will only be granted where it can be demonstrated that the benefits of the development proposals clearly outweigh the harm to the site and has followed the hierarchy of mitigation so that biodiversity / geodiversity damaged from development should first be avoided, then mitigated on-site and finally, as a last resort and where acceptable, offset.
165. Paragraph 180 of the NPPF refers to principles which should be applied when determining a planning application. Subsection (d) states that development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity.
166. Paragraph 16⁴ of the National Planning Policy Guidance (NPPG) states that an ecological survey will be necessary in advance of a planning application if the type and location of development are such that the impact on the biodiversity may be significant and existing information is lacking or where protected species may be present. Paragraph 17⁵ goes on to say biodiversity enhancements can take the form of habitat restoration, re-creation and expansion; improved links between sites; buffering of existing important sites; new biodiversity features and securing management for long term enhancement.
167. The application is accompanied by a biodiversity net gain assessment report (BNG), in accordance with the Defra metric and paragraph 180(d) of the NPPF.
168. Paragraph 180(d) provides that development whose primary objective is to conserve or enhance biodiversity should be supported. The requirement for at least 10% BNG, under the Environment Act 2021, does not become mandatory for planning applications until November 2023. Therefore, there is no obligation for 10% BNG but applicants should start planning for this requirement.
169. The submitted BNG report outlines the different types of habitat across the application site and the baseline situation for each habitat. The report states that some habitats will be removed and will not be replaced, these include; tall ruderal herbs and watercourses which are considered to be poor-quality habitats. In addition amenity grassland will be removed and this will be offset by the creation of species-rich grassland (neutral grassland) within the site boundary.
170. The proposed new roundabout would result in a loss of on-site habitat, due to tree and grassland removal. However, the inclusion of landscaping within the new roundabout and the off-site habitat provisions would ensure that overall the proposal would result in an increase in biodiversity net gain.

⁴ 16 Reference ID: 8-016-20140612

⁵ 17 Reference ID: 8-017-20140306

- 171. In order to achieve an increase in BNG the following habitats have been considered, broadleaved woodland, semi-improved neutral grassland and species-rich hedgerow, which will be provided on land off-site (leased by Surrey County Council). In doing so the applicant would create a net gain for the application, demonstrating that over 10% BNG has been achieved.
- 172. The applicant has provided three drawings ref: Drawing 1 proposed habitat creation plan junction 6 100416383-ARC-EGN-ZZ-DR-ZZ-00002 Rev 03, Drawing 2 proposed habitat creation plan junction 6 100416383-ARC-EGN-ZZ-DR-ZZ-00008 Rev 01 and drawing 2 proposed habitat creation plan junction 6 ref: 100416383-ARC-ENG-ZZ-DR-ZZ-00009 Rev 01 which refer to the off-site habitat provisions. The submitted plans indicate that an area of land, outside of the application site boundary, will be planted with native wildflower grassland and native broadleaved woodland to create off-site habitats which will mitigate the loss of habitats within the application site. Officers are therefore satisfied that biodiversity net gain would be achieved through off-site habitat provisions, subject to the planning conditions.

Conclusion of ecology, trees and biodiversity

- 173. The mitigation measures put forward by the applicant to mitigate the loss of habitat, on site, are considered to be acceptable.
- 174. Overall, officers consider that the proposal would not have an adverse impact on the habitats and ecology within the application site. Therefore the proposal, subject to the inclusion of planning conditions would accord with policy EE9 of the RBLP and NPPF.

FLOODING AND SURFACE WATER DRAINAGE

Runnymede Local Plan 2030

Policy EE13 – Managing Flood Risk

National Planning Policy Framework 2021 – paragraph 159, 167 and 169

- 175. Paragraph 159 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 176. Paragraph 167 further states that in determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site specific flood-risk assessment. Developments should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception test, as applicable) it can be demonstrated that:
 - a) the most vulnerable development is located in areas of lowest flood risk;
 - b) the development is appropriately flood resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment.
 - c) it incorporates sustainable drainage systems (SuDS).
- 177. Paragraph 169 of the NPPF refers to major development and states that it should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should take account of advice from the Lead Local Flood Authority (LLFA); have appropriate minimum operation standards; have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development and where possible provide multifunctional benefits.
- 178. Policy EE13 of the RBLP states that new development will be guided to areas of low flood risk from all sources of flooding. Any development proposal in flood zone 1 (over 1

hectare) must be accompanied by a site specific Flood Risk Assessment (FRA), proportionate to the scale of the development. It must demonstrate that all forms of flooding have been taken into account (as detailed within the Council's Strategic Flood Risk Assessment) over the lifetime of the development and must address impacts on climate change and be constructed with adequate flood resilience and resistance measures.

179. The applicant has engaged in pre-application discussions with the LLFA and Environment Agency and has submitted an FRA and Drainage / SuDs strategy in support of the application. The applicant has also submitted additional information on flood modelling, as requested by the EA following a review of the FRA, and a Sequential and Exception Test (SET) (document ref: 10053900-ARC-EWE-Jo6-TN-ZZ-00001).

Flood Zones 2 and 3

180. The application site falls partly within Flood Zones 2 and 3 which are regarded as medium to high flood risk areas. Flood Zone 3 extends from the existing carriage way near Little Green Lane to the junction with Guildford Road and Holloway Hill and Green Lane. The carriageway north of Green Lane and fronting onto Salesian School is within Flood Zone 2. The Environment Agency mapping confirms this.
181. Paragraph 162 of the NPPF states that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk or in the future from any form of flooding. Policy EE13 of the RBLP supports this.
182. The applicant has stated within the submitted SET that alternative designs and site were considered, however, all the options explored required work within the designated flood zone. Although the proposal would be located within the flood zone, the applicant has sought to minimise the footprint and mitigate any potential flood risk.
183. Paragraph 3.4 of the SET concludes that *"As part of the Sequential Test, Arcadis has considered the potential alternative sites within the study area. We have considered existing allocations of the adopted local plan and Runnymede Strategic Land Availability Assessment (SLAA) 2022. We have also considered other A320 corridor project sites within or adjacent to the study area. None the sites examined are considered 'reasonably available sites' as they are not in a suitable location for the type of highway development being proposed with the prospect of the site being available to be developed at the point in time envisaged for this development. In addition a number of alternative infrastructure improvement schemes have been assessed at the location of proposed development. Of those assessed, that being proposed achieves the criteria established for the scheme and has been developed to satisfy flood risk requirements established by the Environment Agency. Therefore, the proposal is in accordance with the National Planning Policy Framework (paragraph 162) and Policy EE13: Managing Flood Risk of the LP as there are no reasonably available sites, appropriate for the proposed development, in areas with a lower risk of flooding"*.
184. Paragraph 163 of the NPPF further states that if it is not possible for development to be located in areas with a lower risk of flooding, taking into account wider sustainable development objectives, the exceptions test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.
185. The Planning Policy Guidance (PPG) on Flood Risk and Coastal Change advises that a pragmatic approach on the availability of alternative sites, should be taken. The

document sets out that only appropriate uses in Zone 3 should be permitted. Table 2 refers to the vulnerability classification and states that essential infrastructure, such as transport infrastructure which has to cross the area at risk, should only be permitted in this zone if the exception test is passed. Essential infrastructure permitted in this zone should be designed and constructed to remain operational and safe for users in times of flood.

186. Paragraph 164 and 165 of the NPPF states that proposed development is appropriate provided that the site meets the requirements of the exception test and to pass the exception test it should be demonstrated that:
- a) The development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - b) The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
187. The application site forms part of an established road network. The highway improvement works include the expansion of the existing roundabout as well as the inclusion of appropriate surface water drainage systems, such as an attenuation pond and improvements to gullies and ditches to ensure adequate removal of surface water from the carriageway.
188. The A320 carriageway is regarded as essential infrastructure which requires improvements to enable the delivery of the Runnymede Borough Local Plan, benefitting existing and future communities within the immediate and wider areas.
189. The proposed road improvements works, within the flood zone and surrounding area, would incorporate appropriate flood defences in the design and construction works. It would also include sustainable drainage provisions to ensure that the flood risks are reduced overall. Maintenance regimes will be put in place to ensure that the drainage is adequately maintained throughout its lifetime.
190. The Environment Agency (EA) initially raised an objection to the application in respect of the original FRA and the type of modelling carried out on site. Further information and modelling has been submitted by the applicant and following extensive consultations, the EA have withdrawn their objection, subject to the inclusion of planning conditions.
191. The proposed development is considered to meet the exception test and would therefore comply with policy EE13 of the RBLP and paragraphs 164 and 165 of the NPPF.

Sustainable Drainage System (SuDS)

192. The submitted drainage / SuDS strategy follows the Design Manual for Roads and Bridges, Surrey County Council SuDS design guidance, SuDS Manual and Manual for contract Documents for Highways Works. An allowance for climate change and higher rainfall intensities have been incorporated into the design to mitigate the risk of surface water flooding in the future.
193. The main function of the highway drainage is to remove surface water from the carriageway and provide effective sub-surface drainage, making it safe for road users and ensuring that the flood risk is not increased elsewhere. It is also important that the proposed drainage design consists of measures to minimise the impact on the environment. SuDS drainage acts as a natural drainage system and manages surface water run off, to attenuate flow and reduce the risk of flooding. Incorporating SuDS in the design improves water quality and provides biodiversity benefits.

194. The applicant has confirmed within the SuDS strategy that the proposed carriageway drainage would be in the form of kerbs and gullies connecting to carriage drains and discharging via gravity. Where possible the carriageway drainage would be routed into an attenuation pond.
195. The proposed drainage layout has attempted to maximise the highway catchment being routed through the pond where feasible; the catchment from Holloway Hill, Hardwick Lane, A320 Guildford Road to the south of the junction and the junction itself are to be routed through the pond.
196. Maintenance of the carriageway drainage would comprise of gullies discharging into the pipe systems or ditches and the maintenance regime would be the same as the existing. Existing and new ditches and the maintenance regime would be maintained to ensure their capacity is not compromised from debris, sediments and vegetation which would impede it's ability to hold and convey the flows. A maintenance layby is included at the roundabout to access the pond and a vehicle access track is proposed from the layby to the pond outfall where it requires more maintenance efforts. The maintenance regime will be secured by planning condition.
197. The LLFA has reviewed the submitted FRA and Drainage / SuDS Strategy and have raised no objections to the proposal, subject to the inclusion of planning conditions to ensure that the design complies with the national Non-Strategy Technical Standards for SuDS and that the proposal is properly maintained through-out the lifetime of the development to ensure that there is no increase in flood risk on or off the site.

Conclusion of Flooding and Surface Water Drainage

198. The applicant has also demonstrated that the proposed SuDS drainage strategy would meet the requirements set out within the NPPF and would provide multifunctional benefits such as biodiversity opportunities and adequate drainage provisions. A maintenance regime has been put in place to ensure that the SuDS drainage is suitably maintained through-out its lifetime.
199. As such officers consider that the proposed development would not cause flooding in the locality and/or elsewhere in the vicinity.
200. The proposal is considered to meet the requirements set out within the NPPF and policy EE13 of the RBLP, subject to planning conditions.

HERITAGE AND ARCHAEOLOGY

Runnymede Local Plan 2030

Policy EE3 – Strategic Heritage Policy

Policy EE4 – Listed Buildings

Policy EE7 – Sites of Archaeological Importance (CSAI) and Areas of High Archaeological Potential (AHAP)

National Planning Policy Framework – paragraph 189-202

201. Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historical interest which it possesses'.
202. One of the core principles of the NPPF is that heritage assets should be conserved in a manner appropriate to their significance. Paragraph 189-199 sets out the framework for decision making in planning applications relating to heritage assets and this application takes account of the relevant considerations in these paragraphs. Paragraph 195 sets

out that 'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including development affecting the setting of a heritage asset) taking into account the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal'.

203. Paragraph 199 of the NPPF states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total harm or less than substantial harm to its significance.' Paragraph 200 goes on to note that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction or from development within the setting), should require clear and convincing justification'.
204. Paragraph 202 of the NPPF outlines that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Paragraph 203 deals with non-designated heritage assets and states that their significance should be taken into account in determining the application. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
205. The NPPF defines the setting of Heritage Asset within the glossary, as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
206. Guidance on the setting of Heritage Assets can be found in the Historic Environment Good Practice Advice in Planning Note 3: The setting of Heritage Assets, Historic England (December 2017). Paragraph 9 of this document makes clear that setting is not itself a heritage asset and its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.
207. Policy EE3 of the RBLP states that development that affects Runnymede's heritage assets should be designed to protect, conserve and enhance the significance and value of these assets and their settings in accordance with national legislation, policy and guidance and any supplementary planning documents. The historic environment in Runnymede includes listed buildings and locally listed buildings.
208. Policy EE4 of the RBLP supports appropriate development which seeks to maintain, sustain and enhance the significance and special architectural and historic interest of listed buildings within the Borough. Proposals should not adversely affect the listed building or its setting by virtue of design, scale, materials or proximity or impact on views or other relevant aspects of the historic building fabric.
209. In accordance with paragraph 194 of the NPPF, the application is supported by a Heritage Statement (HS) which identifies the heritage assets and describes the significance of the heritage asset affected, including the contributions made by their setting.
210. The following heritage assets have been identified within the HS, these include:
 - Arbon Cottage (Grade II)
 - Hardwich Court Farmhouse and Barn (Grade II)

211. There are no known heritage assets recorded within the application site boundary and the proposal would not result in the alteration or demolition of a listed building. Therefore, it is appropriate to assess whether the proposal would harm the setting of the listed buildings and/or their significance.

Arbon Cottage (Grade II)

212. Arbon Cottage is an attractive small 17th century country house, situated south of Holloway Hill. The building resembles how it would have looked in the 18th and 19th centuries, with a projecting end chimney, sash windows and ground floor veranda. The construction, design and development of the building is of historical value. The house is relatively intact and unchanged from the 19th century and connects us to the past way of life and allows one to better understand how people lived 200-300 years ago. The rural character of the area has been lost due to development within the immediate area, however, the carriageway (junction 6) is still located on the site of the historic junction, although the road has been modernised and now includes two small roundabouts. In addition, large residential development within the immediate area have resulted in increased footfall and car usage contributing to noise levels.
213. The cottage is well screened from the road by dense tree coverage and high fencing and it is difficult to view the property from the public realm. The proposed development would not be visible from the listed building due to the tree coverage and surrounding built form.
214. The once rural, peaceful surroundings of the building has largely been lost, due to surrounding development, and the contribution to the setting is significantly reduced. As such the application site does not contribute to the significance of the listed building, nor does it help in the appreciation of the building's significance. The County Historic Buildings Officer (CHO) is in agreement that the development would not contribute to the setting of Arbon Cottage and as a result the proposal would have no impact on the special interest of the listed building.

Hardwick Court Farmhouse and Barn (Grade II)

215. Hardwick Court Farmhouse and Barn is a 16th and 17th century farmhouse situated to the west of Hardwick Lane. The three prominent chimneys and two great gables reflect the importance of the farmhouse during the 16th and 17th centuries. The barn is a medieval barn and a rare survivor of its kind. The construction and design of the farmhouse and barn, alongside the archaeological potential means both buildings are of historical, evidential and aesthetic value.
216. The farmhouse and barn are survived by many of the historic buildings within the farmyard. New buildings and alternations to the farmyard buildings do detract from the appreciation of the farmhouse and the barn, however, fields continue to border the farmyard to the west. There is no visual connection between the listed buildings and the application site, however, part of the application site includes an area of grassland to the south of the farm, which historically formed part of the farm ownership.
217. There are elements of the farmhouse and barn's setting which contribute to the significance of the listed buildings. Hardwick Lane is for the most part in its historical position, however, the road has been altered and its modern appearance, alongside the busyness and road noise, has detracted from the appreciation of the listed buildings. Overall the application site would not visually contribute to the significance of the listed buildings, however, part of the fields to the south of the farmhouse have been included within the application site and will be developed to accommodate the new junction. The CHO is in agreement that the historic rural setting of the building would continue to be retained, despite part of the field being removed to facilitate the proposed development.
218. The CHO has reviewed the HS and assessed the proposal in accordance with policies 195 and 199 of the NPPF. The officer has concluded that the proposed development

would not cause harm nor would it have a material impact on the special interest the listed buildings.

Archaeology

219. Policy EE7 of the RBLP refers to sites of archaeological importance and areas of high archaeological potential. Proposals within these areas should conserve, and where appropriate enhance the significance, historic features and importance of the site.
220. A desk based Archaeological Assessment (AA) has been submitted in support of the application. The document has examined all the relevant and current available recourses to determine whether the site has any archaeological potential and whether the proposal would have an impact on any heritage assets in the vicinity.
221. The report concluded that there would be no impact upon any known designated archaeological assets. However, based on previous discoveries within the area, the site is considered to have a moderate potential for prehistoric remains. The AA recommends that mitigation measures in the form of trial trench evaluations should be put in place. With targeted areas on the west of the application boundary, enabling the identification of any buried remains which may be present on site. The report has also recommended that an archaeological watching brief strategy should be developed to enable the implementation of archaeological monitoring during below ground works.
222. The County Archaeological Officer (CAO) has reviewed the AA and is in agreement with the recommendations of the assessment. The CAO considers that it would be reasonable and proportionate to secure further monitoring and mitigation works though the inclusion of a pre-commencement planning condition. The pre-commencement planning condition would require the applicant to submit a programme of archaeological works (for below ground works) to the CAO, prior to the commencement of the development.
223. Subject to the inclusion of a pre-commencement planning condition, no objections to the proposal were raised by the CAO.

Conclusion of Heritage and Archaeology

224. In accordance with paragraph 194 of the NPPF, officers consider that the applicant has described the significance of the heritage assets affected by the proposal and included contributions made by their setting.
225. In accordance with paragraph 195 of the NPPF, officers have assessed the particular significance of the heritage assets which may be affected by the proposal (including their setting) and taken into account the available evidence and necessary expertise. Having given due regard to paragraph 199 of the NPPF, officers are of the opinion that the proposal would not cause harm to any of the designated heritage assets.
226. The proposed development is not considered to have an impact on the historic assets within the vicinity and subject to planning conditions the development would comply with policy EE7 of the RBLP.
227. The proposed development is considered to accord with policies EE4 and EE7 of the RBLP.

RESIDENTIAL AMENITY, NOISE AND AIR QUALITY

Runnymede Local Plan 2030

Policy EE2 – Environmental Protection

National Planning Policy Framework – paragraphs 174, 185, 186

228. Paragraph 185 of the NPPF states that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area impacts that could arise from the development. In doing so they should:-
- a) 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.
 - c) limit the impact of light pollution from artificial light on amenities
229. The main impacts on residential amenities arising from the proposal are considered to be noise, air quality and construction works. No buildings or other structures have been included within the proposal and as such there would be no overbearing or overshadowing of nearby residential properties.
230. The application site is surrounded by existing built form, including residential properties along the southern, eastern and south-western boundaries. The nearest residential properties, directly impacted by the proposal are situated to the east of Guildford Road namely the Lodge, Bretlands Road and Green Lane.
231. The existing carriageway is situated at the rear of the properties along Bretlands Road and at the front of The Lodge. These properties are located within close proximity to the development site and therefore likely to be directly impacted by the construction works, particularly in relation to noise.
232. It is noted that the proposed development is not in itself considered to have a material impact on the overall traffic and noise levels, as the proposed road improvements to junction 6 and the wider A320 corridor, are expected to result in less localised congestion and an increase in free flowing vehicle movement.

Noise

233. The applicant has submitted a noise and vibration assessment in support of the application. The report has assessed the noise and vibration effects during the construction works and the operational noise impacts. Noise predications for the construction phase were made in accordance with BS5228:2009+A1:2014 Part 1 at a distance of 25m, 50m, 100m, 200m and 300m from the proposed construction works associated with the junction.
234. The operational impacts have been assessed in accordance with the Design Manual for Roads and Bridges (DMRB) and the construction noise levels have been assessed in accordance with the British Standards BS5228. Noise predications follow the methodology contained in the Calculation of Road Traffic Noise (CRTN).
235. Paragraph 001⁶ of the NPPG recognises that noise needs to be considered when development may create additional noise. Paragraph 005⁷ outlines that noise may slightly affect the acoustic character of an area but not to the extent there is a change in quality of life or behavioural changes. Paragraph 006⁸ goes on to say that there are various factors which combine in any particular situation that may lead to a noise impact such as the source and absolute level of the noise together with the time of day it occurs, how a new

⁶ Paragraph: 001 Reference ID: 30-001-20190722

⁷ Paragraph: 005 Reference ID: 30-005-20190722

⁸ Paragraph: 006 Reference ID: 30-006-20190722

noise relates to the existing sound environment alongside the frequency and tonal characteristics of the noise.

236. It is noted that the residential areas near to the application site already suffer from road noise due to their close proximity to the highway (A320) and the nearby M25. As part of the proposal, the applicant carried out monitoring of noise levels in the vicinity of the application site to understand the baseline noise levels. The monitoring was carried out in accordance with BS7445:1-2003 and found an average noise level between 61.9 – 64.4 $L_{Aeq,T}(dB)$ for daytime. For night time, the noise assessment estimates ambient levels at 55 dB.
237. The noise assessment provides information on the construction effects of the project and uses methodology in BS52228:2009+A1:2014. The assessment looked at the worst case scenario of all plant and machinery working at the same time in the same location and with no screening. The noise assessment outlines that during the enabling works, off-line works, on-line works and close out activities would take place during the day time and 24 residential properties would have the potential for significant effects from noise without mitigation. For the online works during the night time the number of properties could increase to 50 where there is no mitigation.
238. The noise assessment has also considered the operational effects of the proposal for the opening year (2024) and the future assessment year (2039) to enable consideration of the change in road traffic noise in the longer term and account for habituation to road traffic noise over time.
239. The noise and vibration assessment has concluded that there is the possibility of significant effects during the construction phase of the development should Best Practice Means (BPM) not be fully implemented. The implementation of the BPM would allow for a significant opportunity to reduce the potential impacts by adopting the methods and reducing noise to an acceptable level. The BPM includes, restricting working hours to core hours, as appropriate, limiting activities outside of core hours, careful selection of plant and construction methods, noisy activities to be staggered, site hoarding with acoustic properties to be provided at the compound area, all vehicles and mechanical plant to be fitted with exhaust silencers and maintained in good working order, compressor and generators to be 'sound reduced' models, use of designated routes and reversing alarms to have minimum noise output. These mitigation measures can be formalised within the construction environmental management plan (CEMP) and would ensure that noise impacts during the construction phase are reduced. The measures proposed in the CEMP include access and delivery times, night working hours and a complaint procedure. Officers consider that it will be necessary to impose a planning condition, requiring a CEMP to be submitted to the County Planning Authority prior to the commencement of works.
240. With regard to the operational phase, no specific mitigation has been recommended for reducing operational noise. However, it is noted that should the new road be surfaced with a thin surface system, as is the standard procedure on Highway England Schemes, noise levels could be further reduced. However, due to the anticipated speed limits around junction 6, a reduction of less than -1dB would be achieved on this scheme.
241. The noise and vibration assessment has also considered the impacts of ground-borne vibrations as a result of traffic movements. The assessment concluded that the proposal would have a negligible magnitude of impact, resulting in effects that are not significant.
242. The County Noise Consultant has reviewed the submitted documentation and has concluded that planning conditions for noise monitoring and hours of working should be imposed to ensure that the amenity of neighbouring properties is not compromised.

243. The applicant has stated within paragraph 6.5.4 of the noise assessment that “*monitoring would be undertaken by a suitably qualified / experienced acoustic consultant on behalf of the contractor to conclude the compliance with appropriate limits. The monitoring would be undertaken at any residential or commercial receptor identified as having the potential to be adversely impacted as a result of noise from the proposed construction works, or on receipt of a justified complaint regarding noise*”. To ensure that noise monitoring is undertaken, it is recommended that a planning condition be imposed.
244. The County Noise Consultant has recommended that an hours of working condition be imposed to ensure that the impact on the nearby residential properties are reduced during the construction phase of the development. The applicant has advised that the core hours of working proposed are:-
- 07:00 – 19:00 (Monday to Friday)
07:00 – 13:00 (Saturday)
No working shall take place on Sundays or recognised Bank, Public and/or National Holidays.
245. The applicant has advised that limited night time working will be required during the on-line construction phases. The appointed contractor will ensure that the night time working hours are provided to the County Planning Authority as soon as reasonably possible. As such, it will be necessary to ensure that the night time working hours are set out within the CEMP, which will be subject to a pre-commencement planning condition.
246. Officers recognise that there will be a noise impact on the residential amenities of nearby residents, as a result of the construction works. However, the impact would be mitigated through noise monitoring, restricted working hours and the submission of a CEMP. Furthermore, the construction works would be temporary and once completed the proposal would provide benefits such as reduced congestion, improved road surfacing and pedestrian/cycle paths.
247. The proposed mitigation measures would reduce the impact on the residential amenities during the construction phases and subject to planning conditions the proposal would accord with policy EE2 of the RBLP.

Air Quality

248. Paragraph 174(e) of the NPPF states that planning decisions should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution. The development should, where possible, help to improve local environmental conditions such as air quality.
249. The EPUK and IAQM guidance “Land-use Planning and Development Control: Planning for Air Quality” comments that there is a clear link between air quality and health in relation to PM₁₀, PM_{2.5} and nitrogen dioxide. The guidance outlines that any air quality issue that relates to land use and its development is capable of being a material planning consideration. In making a planning application decision, weight should be given to impact on air quality. In addition to the policies in the local plan, the proposal would be dependent on such factors as:
- The severity of the impacts on air quality
 - The air quality in the area surrounding the proposed development
 - The likely use of the development i.e. the length of time people are likely to be exposed at that location
 - The positive benefits provided through other material considerations

250. The control of air pollution is the responsibility of local authorities and other government regimes. The role of local authorities is covered by the Local Air Quality Monitoring (LAQM) regime. Runnymede Borough Council is responsible for monitoring and declaring Air Quality Management Areas (AQMA) in this case.
251. In terms of the air quality impacts associated with traffic, the Environmental Protection UK (EPUK) / Institute of Air Quality Management (IAQM) '*Land-Use Planning and Development Control: Planning for Air Quality*' document provides indicative criteria for determining when an air quality assessment is likely to be required. For developments outside an Air Quality Management Area, such as the application site, an air quality assessment is likely to be required for developments generating a change in traffic movements of an annual-average daily movements of 100 HGVs or more.
252. The application site does not fall within an AQMA and therefore an air quality assessment has not been submitted as part of this application. The applicant has advised that an air quality assessment was not submitted as it was agreed, following the adopted screening opinion undertaken in April 2021, that only a construction dust assessment would be required as part of the application. Taking into account the background air quality concentrations of key pollutants for the current period and for the future year of 2030 and the conclusions of the air quality assessment for the adopted Runnymede Local Plan (2030), it is concluded that the implementation of the proposed highway improvement works along the A320 corridor would not give rise to significant impacts on local air quality over the longer term. The implementation of the scheme would not be expected to adversely affect the implementation of the measures set out in the air quality action plan for the M25 Air Quality Management Area (AQMA).
253. Implementation of the proposed scheme of works would be expected to deliver benefits such as reduced traffic congestion, improved journey times and improved accessibility for pedestrians and cyclists. In operational terms the proposed development is not expected to give rise to significant adverse impacts on traffic levels or highway capacity and the impacts as a result of the construction phase would be mitigated through the submission of a traffic management plan, which would be secured by planning condition.
254. An Air Quality Assessment is usually undertaken to inform the decision making process and it does not, in itself, provide a reason for granting or refusing planning permission.
255. The application site and wider A320 corridor has been identified as a road network requiring capacity improvements. The proposed development is expected to reduce congestion and improve journey times along the A320 corridor. In addition, the proposal would provide improved pedestrian and cycle provisions for improved connectivity. Information provided within the transport assessment advises that the junction improvements are expected to substantially decrease vehicle queuing lengths during peak periods.
256. The County Air Quality Consultant (CAQC) has reviewed the accompanying documentation and transport assessment and initially requested clarification on whether the proposal would result in the redistribution of vehicles onto the other roads within the vicinity. The applicant responded to this request stating that the level to which the additional traffic may be attracted to the corridor has not been determined. However, the extent of the highway network outside of the scheme would limit peak hour demands. The proposed improvements to the application site and other junctions along the A320 corridor are likely to result in improvements to the air quality as there would be less localised congestion along this road network.
257. The CAQC has reviewed the additional information submitted by the applicant and concluded that based on the findings of the air quality assessment undertaken to inform the Runnymede Local Plan, which includes highway infrastructure changes, it is agreed that the air quality impacts associated with the junction are unlikely to be significant.

258. The proposed highway scheme has been developed to facilitate a reduction in traffic movements and to reduce traffic levels. Therefore, the proposal is unlikely to cause an adverse impact on the air quality, within the immediate area, as the capacity on the road network is unlikely to increase, as a result of the junction improvements.
259. However, it must be noted that future development as outlined in policy SD2 of the RBLP may have an impact on the air quality within the area. As such, the air quality levels of forthcoming developments would need to be assessed independently by the Borough Council as part of the formal planning process.
260. The proposed development is considered to accord with paragraph 174(e) of the NPPF as the development would not contribute to unacceptable levels of air pollution.

Dust

261. A construction dust assessment (CDA) has been submitted in support of the application. The CDA has identified that the construction activities at the site have the potential to result in fugitive dust emissions through-out the construction phases.
262. Vehicle movements both onsite and on the local road network have the potential to result in the re-suspension of dust from the highway surfaces. The impact on sensitive receptors depends significantly on local weather conditions during the undertaking of the dust generating activities, with the most significant effects likely to occur during dry and windy conditions. The CDA has assessed the magnitude of dust emissions that could be generated from the proposal using the IAQM 'Guidance on the assessment of Dust from demolition and construction v1.1' guidance which provides a series of steps to undertake this assessment. The assessment process looks at the scale and nature of the works, the activity involved (demolition, earthworks, construction and trackout) and categorises them according to magnitude (large / medium / small). This is then compared with the sensitivity of the receptors near to the site with receptors categorised as high / medium and low.
263. The CDA identifies the dust generating activities that would occur with this proposal for each part of the construction phase. This includes:-
- Demolition of a small section of boundary wall outside The White Lodge Centre and the removal of the existing central island of both roundabouts. These works are considered to have a small dust emission magnitude.
 - Minor demolition to the existing access at Salesian School, considered to have a small dust emission magnitude.
 - Earthworks with earth moving equipment, considered to have a small dust emission magnitude.
 - Potential dust emissions from the construction materials such as asphalt, aggregate, timber and concrete. The dust magnitude is considered to be medium.
 - Trackout on unpaved roads, considered to have a small dust emission magnitude.
264. A number of sensitive receptors have been identified within 350m of the site boundary. The CDA has assessed the potential impacts on these receptors for dust soiling, human health and ecology and has indicated that the risk of dust effects are considered to be medium, as a worst case scenario.
265. The CDA has also identified mitigation measures to ensure that the impacts of dust on the sensitive receptors are minimised during the construction phases. The mitigation measures proposed include:-
- Communication with stakeholders and community engagement
 - The submission of a dust management plan, to be included within the CEMP
 - Site management recording of all dust and air quality complaints, identifying cases, taking appropriate measures and recording incidences.

- Monitoring undertaken daily on site and off-site and records to be made available as required.
- Preparing and maintaining the site layout so that machinery and dust causing activities are located away from receptors. The use of solid screening or barriers around dust activities are recommended.
- Materials that have the potential to produce dust on site will be covered.
- Engines from operating vehicles/machinery will be switched off when stationary and the use of diesel and petrol generators will be avoided.
- Operations including use of dust suppression techniques such as water sprays for cutting, grinding or sawing equipment will be put in place.
- No bonfires will take place on site and debris will be bagged.
- Sand and other aggregates are to be stored appropriately to avoid dust.
- Concrete and other fine materials will be delivered in enclosed tankers and stored in silos.
- Vehicle cleaning and inspections of road surfaces will be carried out prior to vehicles leaving the site.

266. It has been identified that the construction phase of the development has the potential to generate dust, which may have short-term adverse impacts on nearby residential amenities. However, the proposed mitigation measures, as set out above, should ensure that significant residual effects, on human and ecological receptors, are reduced. Officers consider the proposed mitigation measures to be acceptable and recommend that the dust mitigation be included within the CEMP, which is to be submitted to the CPA for approval.

267. The County Air Quality Consultant has reviewed the submitted CDA and is in agreement with the content and assessment which has been undertaken and has raised no objection.

Conclusion of Noise, Air Quality and Dust

268. The proposed highway improvement works are essential in order to meet the future growth within the immediate and wider area of Runnymede. The changes in the flow of traffic along the A320 corridor are considered, on balance, to result in improvements to the air quality and noise, due to a reduction in traffic congestion.

269. The inclusion of a CEMP would ensure that any impacts, as a result of the construction works, on sensitive receptors would be minimised. The proposal is therefore considered to accord with policy EE2 of the RBLP and paragraphs 174, 185 and 186 of the NPPF.

HIGHWAY CAPACITY AND SAFETY, PEDESTRIAN AND CYCLE ACCESS

Runnymede Local Plan 2030

Policy SD4 – Highway Design Considerations

National Planning Policy Framework – paragraph 111, 113

Surrey Transport Plan 2022

Supplementary Planning Document – Infrastructure Delivery and Prioritisation (2020)

270. Paragraph 111 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 113 further states that development that will generate significant amounts of movements should be supported by a transport assessment so that the likely impacts of the proposal can be assessed.

271. Policy SD3 of the RBLP refers to active and sustainable travel. The policy states that the council will support schemes and development proposals which enhance the accessibility

and connectivity between people and places by active travel and sustainable travel. This will be achieved by:-

- Supporting and implementing the objectives and strategies of the Surrey Local Transport Plan, strategies and projects prepared by the Transport for South East or agreed under the Duty to Cooperate, and schemes which help to alleviate existing transport and highway problems in Runnymede or the wider area as identified through further partnership working;
 - Supporting developments, including sites allocated in the Plan, which integrate with or provide new accessible, safe and attractive active and sustainable travel networks and routes to services and employment centres and rail interchanges;
 - Refusing planning permission for any development which would compromise the delivery of the mitigation works required to the A320 and/or M25 junction 11.
272. Policy SD4 of the RBLP states that development proposals which maintain or enhance the efficient and safe operation of the highway network and take account of the needs of all highway users for safe access, egress and servicing arrangements will be supported.
273. The Surrey Transport Plan 4 (STP4) covers the period January 2022 to March 2032 and sets out the strategy to help people meet their transport and travel needs effectively, reliably, safely and sustainably within Surrey, in order to protect and enhance the environment, improve the quality of life and reduce carbon emissions. The plan also highlights how transport networks should be integrated and provide benefits to people's health and the environment.
274. The A320 Guildford Road is a key link road between the M25 and surrounding communities such as Chertsey, Ottershaw and Woking. It also provides an access route to St Peter's Hospital.
275. The proposed development is seeking to address existing and future congestion problems along the A320 corridor, including improvements to the existing road, cycling and pedestrian networks. The proposal is also seeking to deliver the improvements to the local infrastructure network to enable the successful delivery of the spatial development strategy and allocated development sites, which have been identified within the RBLP.
276. The proposed new roundabout would be an elongated un-signalised roundabout located north-west of the existing roundabout. It would incorporate a two lane southbound approach onto Guildford Road north, Guildford Road south and Holloway Hill. Two lane westbound approach at the junction, flaring from existing single lane onto Green Lane. One lane exit from Guildford Road north, Green Lane and Holloway Hill. A 4m wide shared use footpath/cycleway around the east side of the junction and uncontrolled pedestrian/cycle crossing at all desire lines and approaches to the roundabout with a proposed toucan crossing south of the junction and north of Little Green Lane.
277. The proposal also includes direct access to Salesian School and The Lodge. Provisions for Sustainable Drainage features for surface water runoff are also included.
278. The proposed roundabout design would be a significant improvement when compared to the existing roundabout. The proposal would meet the 2030 predicted traffic requirements to support the traffic demands arising from the development of new housing in the area and the need to increase capacity along the A320 corridor. The traffic improvements throughout the junction would result in improved journey time and reliability when compared with the existing arrangements, thereby supporting the local economy and housing developments.
279. The proposal would also promote the free flow of traffic, reducing congestion within the immediate and wider areas. An inset layby would be provided alongside the southbound

carriageway at the front of Salesian School to reduce congestion during school drop off and pick up peak periods.

280. The application has been accompanied by a Transport Assessment (TA), as required by paragraph 113 of the NPPF. The TA includes analysis of the existing junction layout and traffic conditions at junction 6.
281. An assessment of the wider A320 scheme has identified that traffic conditions will be within capacity in the 'Do Something future design year of 2030' with a reduced frequency and severity of queues. With the proposed scheme in place, the Paramics traffic modelling assessment has identified that there would be significant journey time savings for road users at junction 6 and the wider corridor during peak hours. The proposed improvements are considered to be essential to meet the future demands of growth in the area and without the junction improvements the area would suffer from adverse journey time impacts, created by congestion and delays.
282. With regard to highway safety, the Highway Authority has assessed the information provided within the TA and additional information provided by the applicant. The CHA is satisfied that the visibility splays at the junctions and link roads and swept path analysis for the proposed improvement works are acceptable. The junction geometry is based on design speed of 30mph for 85th percentile traffic. This is considered compatible with the busy, urban nature of the junction and approach roads and would reduce the severity of any road traffic collisions.
283. In order to ensure that the development is constructed safely and existing highway users and residents living and working within close proximity to the development are not adversely impacted, it is recommended that a Construction Traffic Management Plan (CTMP) and programme of works be provided. This would be secured by planning condition and would need to be approved prior to the commencement of development.
284. Temporary road closures may be required during the construction phases and appropriate diversion routes would be identified and provided at the CHA to minimise any impacts on road users.
285. The proposed development has been designed to provide more free-flowing movements, reducing the queuing impacts and resulting in less congestion further upstream along the corridor. It is also expected to improve pedestrian and cycle access resulting in safer operational use for non-motorised users.
286. The improvements to junction 6 and the wider A320 corridor would allow for future demands and growth within the Borough and wider area and without these improvements the area would suffer adverse impacts as a result of congestion and delays to motorists.
287. The County Highway Officer (CHO) has reviewed the TA and has raised no objections to the proposal.

Conclusion of Highway Capacity, Safety, Pedestrians and Cyclists

288. The junction 6 highway improvement works are critical to the delivery of development within the local area, supporting residential needs and economic development. The Runnymede Local Plan 2030 places an emphasis on the

importance of infrastructure projects and further states that the Council will support investment in the surrounding roads, in particular the A320.

289. Areas of future housing development have been identified within the Runnymede Borough Local Plan and the junction and wider A320 corridor is already at capacity. The proposal would allow for a new roundabout and other highway improvements to ensure an efficient and safe operation of the highway network in the locality, as identified through traffic modelling.
290. The proposal includes increased pedestrian and cycle connectivity around the junction taking into account of the needs of all highway users for safe access and egress.
291. Officers are satisfied that the proposal would provide additional highway capacity and road safety in accordance with policy SD4 of the RBLP. The proposal would also support active and sustainable travel, through the improved pedestrian/cycle routes and a reduction in congestion, meeting the requirements of policy SD3 of the RBLP.
292. The CHA has reviewed the proposal from a highway safety perspective and has raised no objections. The proposal would also improve the efficiency of the junction and surrounding road network and would accord with the requirements set out in paragraphs 111 and 113 of the NPPF.

GREEN BELT

Runnymede Local Plan 2030

Policy EE18 – Engineering Operations in the Green Belt

National Planning Policy Framework – paragraph 137, 148, 150

293. Policy EE18 of the RBLP states that proposals for engineering operations including the laying of roads and hardstanding are considered to be inappropriate development unless the applicant has demonstrated that the operations preserve the openness of the Green Belt at the site and its vicinity, and do not conflict with the purposes of the Green Belt. The extent and visual impact of the changes in land levels will be taken into account in assessing such proposals, as will the purpose and intent of future use of the hardstanding in order to ensure the visual effects are not harmful.
294. Paragraph 137 of the NPPF states that the great importance is attached to the Green Belt. The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Paragraph 138 further states that the Green Belt serves five purposes these being:-
- a) To check the unrestricted sprawl of large built-up areas;
 - b) To prevent neighbouring towns merging into one another;
 - c) To assist in safeguarding the countryside from encroachment;
 - d) To preserve the setting and special character of historic towns; and
 - e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land
295. Of the five purposes of including land within the Green Belt, the proposal is not considered to assist in safeguarding the countryside from encroachment due to the encroachment onto land to the west. Therefore the proposal would conflict with point c) of paragraph 138.

296. Paragraph 147 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 further states that when considering any planning applications, local planning authorities should ensure that 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.
297. The proposed development is an engineering operation and a local transport infrastructure project. Paragraph 150 of the NPPF states that engineering operations and local transport infrastructure which can demonstrate a requirement for a Green Belt location are not inappropriate development provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
298. The proposed development would introduce a new roundabout, which would encroach onto an area of open land to the west of the existing road network. The new roundabout and associated infrastructure such as lighting columns, road signage and vehicle movements, would further intrude, causing some harm to the openness of the Green Belt. Therefore it is considered that the proposed development would constitute inappropriate development.
299. Accordingly, for planning permission to be granted the applicant would need to demonstrate that 'Very Special Circumstances' (VSC) exist. Paragraph 148 of the NPPF states that substantial weight is to be given to any harm to the Green Belt. VSC 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. Therefore, where the other considerations clearly outweigh Green Belt harm, and any other harm resulting from the proposal, planning permission may be granted.
300. The key consideration is the determination of the extent of the impact on the openness of the Green Belt. The application site forms part of an existing road network which contains areas of hardstanding. The proposed new roundabout and carriageway improvements would be built on open land to the west of the existing road, resulting in harm to the openness of the Green Belt.

Harm to Openness

301. The proposed new roundabout would be situated north-west of the existing roundabout. Part of the existing carriageway has been incorporated into the design and where possible the proposal would be built on areas of previously developed land. However, the western elevation of the proposal would encroach into areas of land where there is no development, resulting in harm to the openness of the Green Belt.
302. There is no dispute that the proposal would cause harm to the visual and spatial dimensions of the openness.
303. Although the road surface would be at ground level, the vehicles themselves although transitory, would cause harm to the visual dimensions of the openness, as would the street furniture (e.g. signage and lighting columns). However, given that the proposal is an existing carriageway and several other roads are within the vicinity, the harm caused by the vehicles and street furniture would not be significant.
304. The greatest visual harm would be to the west of the existing junction as development would occur on an area of grassland within the Hardwick Court Farm SNCI. The areas to the east of the existing roundabout would be visually contained within large areas of existing hardstanding from the carriageway as well as various buildings, resulting in less harm to the openness.

305. The proposed development would initially result in significant harm to openness, however, the harm would reduce over time once the landscaping has matured and construction works have ceased.
306. Officers consider that the built form of the proposed highway improvement works would cause harm to the openness of the Green Belt and as such can only be permitted where very special circumstances are demonstrated which clearly outweigh the harm caused.
307. The proposed new roundabout would encroach onto an area of open land to the west of the existing roundabout, which is currently undeveloped grassland within the Hardwick Court Farm SNCI. The encroachment onto the countryside would cause harm to the openness of the Green Belt and would not assist in safeguarding the countryside from encroachment contrary to point c) of paragraph 138 of the NPPF.

Very Special Circumstances (VSC)

308. In line with the development plan policies the applicant has put forward factors which they consider to amount to very special circumstances which it considers clearly outweigh the harm resulting from the proposal.
309. Paragraph 148 of the NPPF states that very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case, the main harm is to the spatial and visual openness of the Green Belt and the report has assessed the potential impacts on the loss of trees and hedgerows, visual impact and amenity.
310. The applicant has made a submission on the basis that other considerations clearly outweigh the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal such that VSC exist to enable planning permission to be granted. The following considerations have been put forward by the applicant:
- Contribution to the delivery of development growth in the Runnymede 2030 Local Plan and associated economic benefits
 - Contribution to improving traffic capacity and journey times
 - Safety considerations
 - Improved surface water drainage
 - Improved pedestrian and cycle facilities

Delivery of development growth

311. Policy SD2 of the RBCLP lists the allocated sites outlined for development within the Borough. A number of the allocated sites are dependent on the delivery of necessary mitigation on the A320. Runnymede Borough Council consider that the allocated sites set out within policy SD2 are the most suitable when considered against the alternatives appraised through a robust site selection process and sustainability appraisal. The allocated sites are considered to offer the best opportunity to achieve sustainable development as well as the delivery of the spatial development strategy.
312. The proposed highway improvement works to the junction and link roads are considered to be essential to the delivery of approximately 3,500 new homes across 10 sites in and around Ottershaw and Chertsey. New supporting infrastructure is therefore required in order to meet the planned housing needs in the borough and deliver the Runnymede 2030 Local Plan.

Contribution to improving traffic capacity and journey times

313. The proposed development would replace the existing roundabout and would provide transport benefits, including improved pedestrian and cycle routes. The design of the roundabout would significantly improve congestion and achieve the predicted 2030 traffic

requirements resulting in improved journey time, reliability and time savings when compared with the existing junction.

314. The proposal would also promote the free flow of traffic reducing congestion within the immediate and wider A320 corridor.

Safety Considerations

315. The proposal includes shared pedestrian/cycle routes around the junction and reduced speed limits on the carriageway.
316. The reduced speed limits would be compatible with semi-urban areas and could assist in reducing the number and severity of any future road traffic collisions. Improved geometry of the roundabout would provide improved entry path deflection and improved radii on the entry and exit roadways, resulting in operational safety improvements.

Conclusion of Green Belt

317. In this case the proposal is for improvements to the existing highway which include a new roundabout and junctions, access, pedestrian and cycle connections, landscaping and associated infrastructure and engineering works. The proposed development is considered to cause harm to the openness of the Green Belt. In accordance with paragraph 148 of the NPPF, harm to the Green Belt must carry substantial weight in the overall Green Belt balance.
318. Inappropriate development should not be approved except in VSC. VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the development, is clearly outweighed by other considerations.
319. Officers have found that the development would be inappropriate development in the Green Belt and would cause harm to the openness and would be contrary to purpose c) of paragraph 138 of the NPPF. Collectively, these harms must carry substantial weight in the overall Green Belt balance.
320. Officers have reviewed the considerations put forward by the applicant and consider that the highway improvement works are necessary in order to deliver improvements to the local infrastructure network and wider A320 corridor. These improvement works are critical to the successful delivery of the spatial development strategy and allocated development sites, as identified within the Runnymede 2030 Local Plan.
321. Officers consider that great weight should be attributed to the delivery of the Runnymede 2030 Local Plan in order to accommodate the planned economic growth and housing delivery.
322. Officers have reviewed the information put forward by the applicant as well as other considerations and conclude that the VSC, put forward in favour of the development, clearly outweigh the harm to the Green Belt and any other harm resulting from the development, identified above. The proposal is therefore considered to accord with paragraph 148 of the NPPF and policy EE18 of the RBLP.
323. VSC for this proposal exist and therefore planning permission should be granted.

Other

324. Under the Town and Country Planning (Consultation) (England) Direction 2021 the County Planning Authority is required to consult the Secretary of State in respect of major development comprising of a site area of more than 1 hectare in size as well as development which may have a significant impact on the openness of the Green Belt.

The Direction states that the Planning Authority shall not grant planning permission on the application until the expiry of 21 days beginning with the date which the Secretary of State tells the Authority in writing is the date he received the material specified.

Therefore, subject to a resolution by the committee to grant planning permission, the application will need to be referred to the Secretary of State to determine whether the application shall be called-in.

Human Rights Implications

325. The Human Rights Act Guidance for Interpretation, contained in the Preamble to the Agenda is expressly incorporated into this report and must be read in conjunction with the following paragraph.
326. The proposal involves highway improvement works to the existing highway and the creation of a new junctions and roundabout. It is recognised that the development has the potential to have an impact on the local environment and local amenity in terms of noise and dust. The proposal would have a short term impact during the construction phase however during the operational phase would improve capacity and traffic flows through the junction. The scale of the impacts is not considered sufficient to engage Article 8 or Article 1 of Protocol 1 and, if planning permission were to be granted any impact has capacity of being controlled or mitigated by measures incorporated in the planning application proposed and planning conditions and controls available through other regulatory regimes.
327. In considering this application and framing the recommendation officers have considered both individual interests of objectors and those in the wider community. Having taken account of the all the facts officers consider that the wider community needs and benefits resulting from the highway improvement works outweigh any impact on individuals.

Conclusion

328. *Officers have determined that the proposal for highway improvement works to junction 6 (Holloway Hill / Green Lane) of the A320 Guildford Road, represents an inappropriate form of development in the Green Belt as the proposal does not preserve the openness and conflicts with the purposes of including land within it. There are other harms arising from the proposal such as the loss of trees and hedgerows, visual impact and amenity.*
329. Officers have reviewed the application and supporting documentation and accept that the Local Planning Authorities should ensure that 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.
330. Whilst the proposed development would be located partially within Flood Zone 3, the mitigation measures put forward by the applicant include flood defences and the inclusion of sustainable drainage provision ensuring that the flood risk is reduced. The proposed mitigation measures would allow for the carriageway to be used safely ensuring that the flood risk is not increased elsewhere.
331. On balance, the public benefits of the proposal as well as the landscape and ecological mitigation measures proposed all weigh in favour of the proposal and therefore it is accepted that the proposal would accord with the relevant NPPF policies and the policies within the RBLP. The application is recommended for approval.

Recommendation

The recommendation is that the application be referred to the Secretary of State under paragraph 10 of the Town and Country Planning (Consultation) (England) Direction 2021, and in the absence of any direction by the Secretary of State, to PERMIT subject to the conditions and informatives set out below :

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Conditions:

IMPORTANT - CONDITION NO(S) 3, 4, 7, 9, 10, 13, 16, 21 MUST BE DISCHARGED PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT.

1. The development to which this permission relates shall be begun not later than the expiration of three years beginning with the date of this permission.

2. The development hereby approved shall be carried out in all respects in accordance with the following plans/drawings:

10041683-ARC-LLO-ZZ-DR-CE-00043 Rev P01 Scheme Site Location Plan June 2021

10041683-ARC-GEN-PKB_JC6-DR-HE-00001 Rev P02 Planning Application General Arrangement July 2021

10041683-ARC-ELS-PKB_JC6-DR-CE-00001 Rev P02 Planning Application Proposed Planting Arrangements July 2021

10041683-ARC-GEN-PKB_JC6-DR-HE-00004 Rev P01 Longitudinal Sections June 2021

10041683-ARC-GEN-PKB_JC6-DR-HE-00005 Rev P01 Cross Sections July 2021

10041683-ARC-GEN-PKB_JC6-DR-HE-00006 Rev P02 Outline Plan July 2021

10041683-ARC-EBD-ZZ-DR-EC-00017 Rev P02 Tree Impact Plan and Protection Plan Junction July 2021

10041683-ARC-HLG-PKB_JC6-DR-LE-00001 Rev P01 Arrangement and Lighting Level Intensity (Lux Contours) 13 October 2021

10041683-ARC-EGN-ZZ-DR-ZZ-00002 Rev 03 Drawing 1 Proposed Habitat Creation Plan Junction 6 July 2022

10041683-ARC-EGN-ZZ-DR-ZZ-00008 Rev 01 Drawing 2 Proposed Habitat Creation Plan Junction 6 July 2022

10041683-ARC-EGN-ZZ-DR-ZZ-00009 Rev 01 Drawing 2 Proposed Habitat Creation Plan Junction 6 July 2022

3. Prior to the commencement of the development hereby permitted a programme of archaeological work, in accordance with a Written Scheme of Investigation, shall be submitted to and approved by the County Planning Authority. The development shall be implemented in accordance with the approved details.

4. Prior to the commencement of the development hereby permitted details of the design of a surface water drainage scheme shall be submitted to and approved in writing by the 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) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
 - b) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+20% 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. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using the maximum discharge rate stated within the approved documents.
 - c) 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.).
 - d) 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.
 - e) Details of drainage management responsibilities and maintenance regimes for the drainage system.
 - f) 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.

The drainage scheme shall be implemented in accordance with the approved details.

5. Within 3 months of the completion 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.
6. Noise levels from demolition and construction works during standard construction hours specified in Condition 12 shall be allowed up to 65dB(A) LAeq,1h at 1 m from the façade of any residential building within the vicinity of the site. Noise generating works shall not take place outside of the hours permitted in Condition 12 without prior consent from the Country Planning Authority (CPA).

- 7. Prior to commencement of development, a Management Agreement, in relation to the land shown on plans reference: 10041683-ARC-EGN-ZZ-DR-ZZ-00002 Rev 03 Drawing 1 Proposed Habitat Creation Plan Junction 6 July 2022; 10041683-ARC-EGN-ZZ-DR-ZZ-00008 Rev 01 Drawing 2 Proposed Habitat Creation Plan Junction 6 July 2022 and 10041683-ARC-EGN-ZZ-DR-ZZ-00009 Rev 01 Drawing 2 Proposed Habitat Creation Plan Junction 6 July 2022 shall be entered into between Surrey County Council and the land owner and a copy of the signed Management Agreement shall be submitted to the County Planning Authority.

On or before 31 March 2024 the identified land shall be delivered and planted in accordance with the final details approved within the LEMP which is to be submitted in accordance with condition 15, and the Management Agreement.

- 8. In the event that unsuspected contamination is found at any time when constructing the development hereby permitted, work in that area shall cease and it must be reported in writing immediately to the County Planning Authority. An investigation and risk assessment must be undertaken to identify what remediation is necessary with a remediation scheme prepared and submitted to the County Planning Authority for their written approval in writing. Once the remediation works have been completed, a verification report confirming this shall be provided to the County Planning Authority for written approval. Once approved, the scheme shall be implemented in full throughout the duration of the construction period.

- 9. Prior to the commencement of the development hereby permitted (including demolition and ground works), an updated Construction and Environment Management Plan (CEMP) shall be submitted to and approved in writing by the County Planning Authority. The CEMP (Biodiversity) shall include the following:

- a) Introduction
- b) Planning Context
- c) Overview and Project Introduction
- d) Ecology and Environment Aspects
 - i. Risk assessment of potentially damaging construction activities.
- e) Project Contact List
 - i. Responsible persons and lines of communication.
 - ii. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- f) Construction Site Rules
- g) Complaints Procedure
- h) Emergency Spillage Plan
- i) Night time working hours
- j) Access and Deliveries
- k) Site Logistics

l) Mitigation and Control Measures

- i. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- ii. The location and timing of sensitive works to avoid harm to biodiversity features.
- iii. The times during construction when specialist ecologists need to be present on site to oversee works.
- iv. Use of protective fences, exclusion barriers and warning signs.
- v. Management of existing trees during construction (including replacement procedure of trees damaged/removed during/for construction);
- m) Site Waste Management Plan and management procedure for construction waste.
- n) Structure removal
 - i. details of any structural works to be carried out;
 - ii. details of any remediation or restoration works to be carried out including what material would be used as infill and to what depth the material would be spread to; and if further soil is to be added details of the volume, depth and how the soil would be placed between any air gaps in the infill material to avoid soil being washed away over time;
 - iii. details of how trees around the existing structure would be protected during any works;
 - iv. whether further surveys are required;
 - v. Details of what plant and machinery to be used; and
 - vi. Access for structure removal including with regards to the Tree Protective measures
- o) Material Storage Plan
- p) Construction lighting to be used, including its location, hours of use and measures to ensure the lighting is downwards and directional.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

10. Prior to the commencement of the development hereby permitted, including demolition, and before any equipment, machinery or materials are brought onto the site, a Tree Protection Plan and method statement following British Standard (BS) 5837:2012 Trees in Relation to Design, Demolition and Construction – Recommendations, shall be submitted to and approved in writing by the County Planning Authority. The measures outlined in the Tree Protection Plan and method statement shall clearly identify root protection areas of trees to be retained and details of any excavation within those areas shall be specified and be carried out in accordance with the details as approved. The measures outlined in the Tree Protection Plan and method statement shall remain in place until all the works have been completed.
11. Within 6 months of the date of this permission, details of a Hard and Soft Landscaping Scheme shall be submitted to the County Planning Authority for approval in writing. The scheme shall include:

- a) a scaled plan showing all existing vegetation and landscape features to be retained and trees and other plants to be planted;
- b) location, type and materials to be used for hard landscaping including specifications, where applicable for:
 - i) permeable paving
 - ii) tree pit design
 - iii) underground modular systems
 - iv) Sustainable urban drainage integration
 - v) use within tree Root Protection Areas (RPAs);
- c) specifications for operations associated with plant establishment and maintenance that are compliant with best practice;
- d) types, materials and dimensions of all boundary treatments;
- e) a planting schedule and specification, including sizes and numbers/densities of all proposed trees/other plants and section drawing(s) of tree pits where relevant;
- f) details of how the existing ground and soil conditions are to be made suitable for tree and other planting;
- g) a 10 year maintenance regime including provision for replacements for failed retained trees and plantings and details of regular maintenance visits, including annual mulching and watering through the summer months with industry standard watering bags being provided to all new trees. Where new trees are to be supplied with a distinct crown, the supply, planting and maintenance of such trees shall be in general accordance with British Standard (BS) 8545:2014 Trees: from nursery to independence in the landscape. Recommendations. In the event of the failure of any soft landscape planting in the first five (5) years of planting, such planting shall be replaced with an equivalent number of live specimens of the same species and size by no later than the end of the first available planting season following the failure, damage or removal of the planting.

The landscaping and planting shall be carried out in accordance with British Standards BS 4428:1989 Code of practice for general landscape operations (excluding hard surfaces) and BS 8545:2014; it shall be implemented in full within 12 months following the completion of the development. The landscaping and planting shall be implemented and managed strictly in accordance with the hard and soft landscaping scheme.

12. No construction vehicles and heavy goods vehicles (HGVs), shall enter or leave the site nor any plant or machinery shall be operated except between the following hours:
- 07:00 – 19:00 (Monday – Friday)
 - 07:00-13:00 (Saturday)

There shall be no working on Sundays or recognised Public, Bank and National Holidays. Night time working shall only take place during the hours set out within the Construction Environmental Management Plan (CEMP) which is to be submitted to the County Planning Authority for approval in accordance with Condition 9.

13. Prior to the commencement of development hereby permitted a Construction Transport Management Plan (CTMP) shall be submitted to and approved in writing by the County Planning Authority. The CTMP shall include, but not be limited to, 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) programme of works (including measures for traffic management)
 - (e) provision of boundary hoarding behind any visibility zones
 - (f) HGV deliveries and hours of operation
 - (g) vehicle routing
 - (h) measures to prevent the deposit of materials on the highway

The development shall be implemented in accordance with the approved details.

14. No external lighting shall be installed as part of the development hereby permitted until details of a lighting scheme for the site have been submitted to and approved in writing by the County Planning Authority. The submitted scheme shall be prepared by a lighting engineer with input from a suitably experienced Ecologist. The lighting scheme shall include the following:
- a) the location, type, mounting, height, lighting controls and luminance of the proposed lighting by means of submission of Isolux plots and drawings of the proposed scheme
 - b) any measures proposed to minimise and control the light spill;
 - c) details as to how the impact of lighting on bats has been minimised

The lighting scheme shall thereafter be implemented in accordance with the approved scheme.

15. Within 6 months of the date of this permission, a landscape and ecology management plan (LEMP) shall be submitted to the County Planning Authority for approval in writing and thereafter implemented in accordance with the approved details. The LEMP shall include the on site provisions and the off site provisions as shown on Drawing refs 10041683-ARC-EGN-ZZ-DR-ZZ-00002 Rev 03 Drawing 1 Proposed Habitat Creation Plan Junction 6 July 2022; 10041683-ARC-EGN-ZZ-DR-ZZ-00008 Rev 01 Drawing 2 Proposed Habitat Creation Plan Junction 6 July 2022 and 10041683-ARC-EGN-ZZ-DR-ZZ-00009 Rev 01 Drawing 2 Proposed Habitat Creation Plan Junction 6 July 2022 but not be limited to the following:-

- Description and evaluation of features to be managed including scattered Broadleaved Trees, Semi-improved Neutral Grassland, Dense Scrub and Species-rich Hedgerows.
- 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 work schedule (including an annual work plan)
 - Details of the body or organisation responsible for implementation of the plan
 - Ongoing monitoring and remedial measures
 - Funding mechanism by which the long-term implementation of the plan will be secured by the developer with the management body 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 approved scheme.
16. Prior to the commencement of the development hereby permitted, a Noise and Vibration Monitoring Plan shall be submitted to and approved in writing by the County Planning Authority, taking into account the limits set in Condition 6. At the request of the County Planning Authority (CPA), noise and/or vibration monitoring shall be undertaken at representative noise and vibration sensitive receptors located adjacent to the application site or calculated from measurements taken at the site boundary. The results of the monitoring shall be reported to the CPA within 14 days of the monitoring taking place. Measurements should only be undertaken by those competent to do so (i.e. Member or Associate grade of the Institute of Acoustics).
 17. All vehicles and mobile plant operating at the site under the control of the operator, which shall include plant and equipment hired by the operator or used by the contractors, must be fitted with white noise broadband reversing alarms that shall be used at all times.
 18. All plant and machinery shall be adequately maintained and silenced in accordance with the manufacturers recommendations at all times.
 19. Vibration levels from demolition and construction works during standard construction hours specified in Condition 12 shall not exceed the levels in Table B.1 and B.2 of British Standard 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration’. Vibration generating works shall not take place outside of the hours permitted in Condition 12 without prior consent from the Country Planning Authority.
 20. The development hereby permitted shall be carried out strictly in accordance with the recommendations set out within Section 4 (4.1.1-4.6.1) of the Ecological Mitigation and Enhancement Measures of the submitted Ecological Mitigation Strategy rev 03 dated June 2021 (document ref: 10041683-ARC-EGN-PKB_JC6-RP-EC-00001) including the mitigation to address vegetation clearance and bird, bat and reptile habitats during the site clearance works, construction works, construction phases and completion of the development.

21. Prior to the commencement of the development hereby permitted, details of a pre-construction badger survey as detailed in section 3.9 'Badgers' of the submitted Ecological Mitigation Strategy rev 3 dated July 2021 (document ref: 10041683-ARC-EGN-PKB_JC6-RP-EC-00001) including details of suitable mitigation measures and a location plan of the location of any badger protection fencing if necessary, shall be submitted to and approved in writing by the County Planning Authority. The development shall proceed in accordance with the approved details.
22. No trees, hedgerows or shrubs within the curtilage of the site, except those identified in paragraph 5.2.1 of the Arboricultural Impact Assessment (document ref: 10041683-ARC-HAC-PKB_JC6-RP-ZZ-00005 Rev 03) dated July 2021 and shown on drawing ref 10041683-ARC-EBD-ZZ-DR-EC-00017 Rev P02 Tree Impact Plan and Protection Plan Junction 6 (Appendix B) or otherwise clearly indicated in any supporting documents as being removed or subject to arboricultural works, shall be felled, lopped or pruned nor their roots removed or pruned during the carrying out of the development, or until the completion of the development hereby permitted.

Reasons:

1. To comply with Section 91 (1)(a) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.
2. For the avoidance of doubt and in the interest of proper planning.
3. To allow archaeological information to be recorded and to comply with policy EE7 of the Runnymede Borough Local Plan 2020 and guidance within the NPPF.
4. 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, in accordance with policy EE13 of the Runnymede Borough Local Plan 2020. The condition is required pre-commencement so as to ensure that drainage design does not increase flood risk on or off site in accordance with Policy EE13 of the Runnymede Borough Local Plan 2020 prior to any works being undertaken which may impact existing surface water drainage arrangements.
5. To ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SuDS and in accordance with policy EE13 of the Runnymede Borough Local Plan 2020.
6. To protect the amenity of residential occupiers during the construction period and in accordance with Policy EE2 of the Runnymede Borough Local Plan 2020.
7. To ensure that off site mitigation measures are provided and in accordance with policy EE9 of the Runnymede Borough Local Plan 2020. This condition is required prior to commencement of development in order to ensure that the proposal provides off site Biodiversity Net Gain provision in accordance with the Biodiversity Net Gain Assessment Report 0041683-ARC-EBD-PKB_JC6-RP-EC-00001 dated June 2021.

8. To protect the health of construction workers and the general public and quality of the water environment from the effects of contamination in accordance with policy EE2 of Runnymede Borough Local Plan 2020.
9. To prevent pollution to the environment, to protect species of conservation concern, to ensure proper waste management; and to protect residential amenity in accordance with Policy EE2 of the Runnymede Borough Local Plan 2020. This condition is required prior to commencement of development in order to ensure that the proposal does not have an impact on the residential amenities of the nearby occupants and protect biodiversity interests.
10. To protect the trees to be retained and enhance the appearance of the surrounding area and to comply with policy EE9 of the Runnymede Borough Local Plan 2020 and guidance within the National Planning Policy Framework. This condition is required prior to commencement of development in order to ensure that the existing trees, to be retained on site, will be protected during the construction works.
11. To ensure a satisfactory development and in the interest of amenity and landscape character and in accordance with Policy EE1 of the Runnymede Borough Local Plan 2020 and guidance within the National Planning Policy Framework.
12. To protect the amenities of the occupiers of nearby properties during the construction period in accordance with Policy EE2 of the Runnymede Borough Local Plan 2020.
13. To ensure that construction works can be carried out safely in order that the development does not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy EE2 of the Runnymede Borough Local Plan 2020. This condition is required prior to commencement of development in order to ensure the construction phase of the proposal is carried out safely and does not prejudice highway safety.
14. To protect the safety and amenities of road users, occupiers of the nearby properties and bats in accordance with Policies EE2 and EE9 of the Runnymede Borough Local Plan 2020.
15. To ensure that the landscape character and appearance of the site is enhanced and to comply with Policies EE1 and EE7 of the Runnymede Borough Local Plan 2020.
16. To protect the amenity of residential occupiers during the construction period and in accordance with policy EE2 of the Runnymede Borough Local Plan 2020. This condition is required prior to commencement of development in order to ensure that the proposal does not have an impact on the residential amenities of the nearby occupants.

17. To protect the amenity of residential occupiers during the construction period and in accordance with Policy EE2 of the Runnymede Borough Local Plan 2020.
18. To protect the amenity of residential occupiers during the construction period and in accordance with Policy EE2 of the Runnymede Borough Local Plan 2020.
19. To protect the amenity of residential occupiers during the construction period and in accordance with Policy EE2 of the Runnymede Borough Local Plan 2020.
20. To protect Priority Species and their habitats in accordance with Policy EE9 of the Runnymede Borough Local Plan 2020.
21. To protect Priority Species in accordance with Policy EE9 of the Runnymede Borough Local Plan 2020. This condition is required prior to commencement of development in order to ensure that the proposal does not have an impact on any potential badger setts within the application site.
22. To protect the trees to be retained and enhance the appearance of the surrounding area and to comply with Policy EE9 of the Runnymede Borough Local Plan 2020 and guidance within the National Planning Policy Framework.

Informatives:

1. If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on our website.
2. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (Section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or is being built. Planning consent for a development does not provide a defence against prosecution under this Act.

Trees and scrub are likely to contain nesting birds between 1 March and 31 August inclusive. Trees and scrub are present on the application site and are assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity during this period and shown it is absolutely certain that nesting birds are not present.

3. The applicants are advised that badgers may be present on site. Badgers and their setts are protected under the Protection of Badgers Act 1992. It is a criminal offence to kill, injure or take badgers or to interfere with a badger sett. Should a sett be found on site during construction, work should stop immediately and Natural England should be contacted. During site preparation works, all open trenches, pits and excavations shall be covered outside working hours so that any transiting fauna that falls into the earthworks can escape.

4. Biosecurity is very important to minimise the risks of pests and diseases being imported into the UK and introduced into the environment. It is recommended that all trees grown abroad, but purchased for transplanting, shall spend at least one full growing season on a UK nursery and be subjected to a pest and disease control programme. Evidence of this control programme, together with an audit trail of when imported trees entered the UK, their origin and the length of time they have been in the nursery should be requested before the commencement of any tree planting. If this information is not available, alternative trees sources should be used. You are advised to consult the relevant UK Government agencies such as the Animal and Plant Health Agency (APHA) and the Forestry Commission for current guidance, Plant Passport requirements and plant movement restrictions. Quality Assurance Schemes followed by nurseries should also be investigated when researching suppliers. For larger planting schemes, you may wish to consider engaging a suitably qualified professional to oversee tree / plant specification and planting.
5. If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written consent. More details are available on our website Ordinary watercourse consents - Surrey County Council (surreycc.gov.uk).
6. The applicant is required to include details of the safe use of existing road diversions during the construction period in the Construction Transport Management Plan (see Condition 13).
7. In determining this application the County Planning Authority has worked positively and proactively with the applicant by: entering into pre-application discussions; assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework including its associated planning practice guidance and European Regulations, providing feedback to the applicant where appropriate. Further, the County Planning Authority has: identified all material considerations; forwarded consultation responses to the applicant; considered representations from interested parties; liaised with consultees and the applicant to resolve identified issues and determined the application within the timeframe agreed with the applicant. Issues of concern have been raised with the applicant including impacts of and on amenity/noise/traffic/air quality/dust/heritage/landscape/ecology/visual impact/flood risk/Green Belt and addressed through negotiation and acceptable amendments to the proposals. The applicant has also been given advance sight of the draft planning conditions. This approach has been in accordance with the requirements of paragraph 38 of the National Planning Policy Framework 2021.

[National Planning Policy Framework Planning Practice Guidance waste; traveller sites; planning for schools development; sustainable drainage systems; parking and Starter Homes.](#)

Contact Janine Wright

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Background papers

The deposited application documents and plans, including those amending or clarifying the proposal, and responses to consultations and representations received, as referred to in the report and included in the application file.

For this application, the deposited application documents and plans, are available to view on our [online register](#). The representations received are publicly available to view on the district/borough planning register.

The Runnymede Borough Council planning register for this application can be found under application reference RU.21/1521.

Other documents

The following were also referred to in the preparation of this report:

Government Guidance

[National Planning Policy Framework](#)

[Planning Practice Guidance](#)

The Development Plan

Runnymede Borough Local Plan 2020

Supplementary Planning Document – Infrastructure Delivery and Prioritisation (2020)

Other Documents

The Surrey County Council Local Transport Plan (LTP4)

Institute of Air Quality Management 'Guidance on the assessment of Dust from demolition and Construction v1.1' 218

Environmental Protection UK (EPUK) / Institute of Air Quality Management (IAQM) 'Land-Use Planning & Development Control: Planning for Air Quality 2017

Design Manual for Roads and Bridges

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, Historic England, December 2017

Planning (Listed Buildings and Conservation Areas) Act 1990

Surrey County Council, Landscape Character Assessment 2015
