

Planning Committee

22 July 2026



Application No.	25/01461/FUL
Site Address	The Vineries Site, Spout Lane, Stanwell Moor, TW19 6BN
Applicant	Cappagh Public Works Limited
Proposal	Demolition of existing buildings and erection of an office, welfare and maintenance building, replacement of existing hardstanding, with retention of existing storage yard (Use Class B8). Associated car and cycle parking, refuse storage and landscaping.
Case Officer	Kiran Boparai
Ward	Stanwell North
Called-in	This application has been 'called-in' by Councillor Button on the grounds of, flooding (especially surface water drainage), increase of traffic (especially Heavy Goods Vehicles - HGVs) and inappropriate use of Green Belt land.

Application Dates	Valid: 18.12.2025	Expiry: 19.03.2026	Target: Extension of time agreed to 23.07.2026
Executive Summary	The site is currently in Use Class B8 (Storage and Distribution) and comprises a two storey warehouse building (in a dilapidated state) with a surrounding open air yard space. Access to the site is via the existing access road from Spout Lane. The site is situated to the north west of Spout Lane and to the south of Airport Way (A3113). There are allotment gardens to the south of the site and residential properties to the west. The site is situated within the designated Green Belt, adjacent to the boundary with the London Borough of Hillingdon, and within a Minerals Safeguarding Area. Due to the proximity to Heathrow, the site is situated within Heathrow safeguarding zone and Heathrow noise exposure contours. It is proposed to demolish the existing building for the erection of an office, welfare and maintenance building with replacement of the existing hardstanding. The works would involve associated car and cycle parking, refuse storage and landscaping. The proposal is considered to have an acceptable impact on the Green Belt, the neighbouring properties and highways. The proposal is recommended for approval.		
Recommended Decision	Approve the application subject to conditions as set out in the Recommendation section (paras. 8.1, 8.2 and 8.3).		

MAIN REPORT

1. Development Plan

- 1.1 The following policies of the Spelthorne Local Plan 2024–2039/40 are of relevance:
- Policy ST1: Presumption in Favour of Sustainable Development
 - Policy ST2: Planning for the Borough
 - Policy PS1: Responding to the Climate Emergency
 - Policy PS2: Designing places and spaces
 - Policy SP7: Heathrow Airport
 - Policy E2: Biodiversity
 - Policy E3: Managing Flood Risk
 - Policy E4: Environmental Protection
 - Policy EC1: Meeting Employment Needs
 - Policy ID2: Sustainable Transport for New Developments
- 1.2 The policies contained within the [National Planning Policy Framework](#) (NPPF) (2024) are also relevant

2. Relevant Planning History

- 2.1 The site has the following planning and enforcement history:

Reference	Proposal Description	Decision
21/00610/FUL	Retention of existing hardstanding (retrospective)	Refused 21.06.2021 Dismissed at Appeal 17.11.2022
18/00751/CLD	Application for a certificate of lawfulness for the existing use of the site for the storage of building materials (Use class B8).	Grant Certificate of Lawfulness 09.08.2018
SP/91/ENF/8	2 no. Enforcement Notices issued in relation to: • Change of use of the land for the parking of vehicles for commercial purposes. Erection of three jacked cabins and the laying of hardstanding	Issued 01/04/1992 Appeal Dismissed 26/08/1993
SO/98/ENF/23	4 no. Enforcement Notices issued in relation to: • Change of use of part of the land to a builders yard • Change of use of part of the land to an office and	Issued 06/11/1998 Appeal Dismissed (with variations to the notices) 03/06/1999

	base area for operating a Courier Service • Change of use of part of the land to car repairs • Erection of a gate and portacabins	
ENF/99/22	3 no. Enforcement Notices issued in relation to: • Change of use of part of the land to the breaking of lorries and associated uses. • Change of use of part of the land to the storage of pallets. • Erection of a portacabin associated with the unlawful use of storage of pallets	Issued 09/09/1999
17/00298/ENF	Enforcement investigation regarding the breach of historic enforcement notice by laying of hardstanding.	<i>(Officer note: A retrospective application was submitted, which was refused and dismissed at appeal. See 21/00610/FUL above. The current application proposes to remove the existing hardstanding).</i>

3. Description of Current Proposal

- 3.1 The application relates to a piece of land of 1.11 hectares at the former Vineries Nurseries site in Spout Lane, Stanwell Moor. To the north of the site is the northern part of the former nurseries, which is occupied by Flowervision (storage and distribution of plants). This site is owned by the applicant and is outlined in blue on the site location plan. The site is located within the Green Belt.
- 3.2 The proposal involves the demolition of the existing building on site and erection of an office, welfare and maintenance building. There will be replacement of the existing hardstanding with the retention of the existing storage yard (Use Class B8). The proposal would include associated car and cycle parking, refuse storage and landscaping.

- 3.3 The existing shared access road to the site will remain. There will be a new tarmac road for the access road into the actual site, with new concrete proposed across the yard area. It is also proposed to have a new landscape buffer along the western boundary.

4. Consultations

- 4.1 The following table shows those bodies consulted and their response.

Statutory Consultees

Consultee	Comment
County Highway Authority (CHA)	No objection subject to conditions
Local Lead Flood Authority (LLFA/SUDS)	No objection subject to conditions
Environment Agency (EA)	No objection – see informatives
Surrey County Council Minerals and waste	No objection subject to conditions
Natural England	None received

Non-Statutory Consultees

Consultee	Comment
Environment Health – Land Contamination/Air Pollution	No objection – requests conditions
Environmental Health – Noise/Lighting	No objection – requests conditions
Surrey Wildlife Trust (SWT)	No objection – requests conditions
County Archaeology	No objection – requests conditions
Sustainability Officer	No objection
BAA Safeguarding	No objection – see informatives Heathrow Airport (HAL) note potential Development Consent Order (DCO) application for airport expansion
Spelthorne Assets	None received
London Borough of Hillingdon	None received
Neighbourhood Services (street scene)	None received

5. Public Consultation

- 5.1 A site notice was displayed, and a notice for the planning application was advertised in the local press.

- 5.2 A total of 16 neighbouring properties were notified of the planning application. The Council has received a total of 35 letters of objection raising issues in relation to:
- Harm to the Green Belt and appearance of the area
 - Highways, traffic and safety
 - Overdevelopment and intensification of use
 - Unchecked industrialisation of the village
 - Harm to residential amenity (noise, disturbance, activity, lighting)
 - Insufficient landscaping and mitigation
 - Environmental concerns and pollution
 - Flooding and drainage
 - Off-airport park project under disguise (*Officer's note: The application can only be assessed as submitted, not under speculation*).
 - Property values (*Officer's note: This is not a material planning consideration*).

6. Planning Issues

- Green Belt
- Design, character and appearance
- Amenity of neighbouring properties
- Parking provision and Highways
- Flooding
- Other matters

7. Planning Considerations

Background

- 7.1 The site obtained a Certificate of Lawfulness in 2018 for the existing use of the site for the storage of building materials (Use Class B8) under application 18/00751/CLD.
- 7.2 Following the issue of the Certificate of Lawfulness, the applicant submitted a planning application for the retention of the hardstanding across the site which was subject to a planning enforcement investigation in 2017. This application was refused (21/00610/FUL) and subsequently dismissed at appeal in 2022 (APP/Z3635/W/21/3287743).
- 7.3 The Inspector considered *'that the adverse impact on openness would overall be limited...most items stored on site will have a solid form, and albeit they may be moveable items or materials, when they are stored on the site their physical presence and bulk could reduce openness'*.
- 7.4 In regards to the purposes of the Green Belt, the Inspector stated *'I am satisfied that the development would not conflict with any of the purposes of including land within the Green Belt'*.
- 7.5 In regards to character, the Inspector stated that *'the visibility of the hardstanding will to some extent be dependent upon how much equipment,*

material etc. is stored on site at any one time, but views of the hardstanding would in general be limited. Accordingly, the effect on the wider area would be marginal'. He therefore considered the hardstanding would not be unduly harmful to the character and appearance of the wider area, and would accord with Policy EN1 of the now superseded Core Strategy and Policies DPD 2009.

- 7.6 The Inspector accepted that *'the existing lawful use has no limits as to what can be stored on site or any restrictions on height'*. However, on balance, the Inspector concluded that whilst *'the proposal would have a limited effect on the openness of the Green Belt, it would cause some harm to it, and thus by definition would be inappropriate'*. Therefore, the appeal was dismissed.
- 7.7 The enforcement notice is extant and as the current application is for the removal of the hardstanding, this would comply with the notice.
- 7.8 It is important to note that since the appeal was dismissed in 2022, the NPPF and Planning Practice Guidance (PPG) on the Green Belt has been updated, which includes the introduction of 'grey belt'. The revised NPPF significantly eases restrictions on limited infilling compared to the 2021 NPPF. In 2021, limited infilling was listed as an exception provided that development did not impact the openness or the purpose of the Green Belt. Under the current NPPF (2024) limited infilling (on previously developed land) is not classed as 'inappropriate development' in the Green Belt provided it does not cause substantial harm to the openness of the Green Belt. It is also not typically classed as inappropriate development on Grey Belt land.
- 7.9 Taking into account the change in Government Policy, it is now considered that the proposed scheme is not inappropriate development in the Green Belt (see Green Belt section below).

Green Belt

- 7.10 The site is situated within the Green Belt. The National Planning Policy Framework (NPPF) 2024 states that the Government attaches great importance to Green Belts. The fundamental aim of 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.
- 7.11 Policy SP4 (Green Belt) of the Council's Local Plan states that in order to uphold the fundamental aims of the Green Belt to prevent urban sprawl and to keep land within its designation permanently open, inappropriate development should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations.
- 7.12 The Green Belt serves five purposes:
- 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.

- 7.13 When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. '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.
- 7.14 The Council's Stage 1 Green Belt Assessment (2017) identified the site and the wider area 2a - 'the Local Area' (as shown on Figure 1) as making the following contribution the Green Belt purposes:

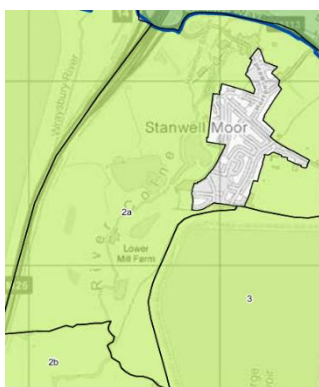


Figure 1 - 2a - the Local Area

- Purpose (a): Check unrestricted sprawl (score 0/5) The Local area is not at the edge of a large built-up area.
 - Purpose (b): Preventing neighbouring towns from merging (score 3/5) The Local area is part of the wider gap between Staines and Stanwell Moor.
 - Purpose (c): Safeguarding the countryside from encroachment (score 3/5) Majority of the area is open and undeveloped.
 - Purpose (d): Preserving historic towns (score 0/5) The Local area does not abut an identified historic area.
- 7.15 The Stage 2 Green Belt Assessment (2018) which is more specific to the site identified 2a-e – 'the Sub-Area' (as shown in figure 2) as making the following contribution the Green Belt purposes:



Figure 2 - Parcel 2a-e – the Sub Area

- Purpose (a): Check unrestricted sprawl (score 0/5) The Sub-Area is not at edge.
- Purpose (b): Preventing neighbouring towns from merging (score 1/5) The Sub-Area forms a less essential part of the gap, settlements are unlikely to merge.
- Purpose (c): Safeguarding the countryside from encroachment (score 2/5) The Sub-Area has a semi-urban character, sense of rurality is diminished by the land uses.
- Purpose (d): Preserving historic towns (score 0/5) The sub-area does not abut an identified historic area.

7.16 From the Council's Green Belt Assessments, it can be concluded that the site does not score highly against the purposes of the Green Belt.

Inappropriate Development

7.17 Paragraph 154 of the NPPF lists exceptions that may result in development not being inappropriate in the Green Belt.

7.18 It is considered that the proposed development would fit into the exception in paragraph 154 (g) which states that development in the Green Belt would not be inappropriate for the 'limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt'.

7.19 The NPPF defines previously developed land (PDL) as land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

7.20 Despite the unlawful hardstanding, it is considered that the site constitutes previously developed land (PDL) as there is an existing Certificate of Lawfulness for the existing use of the site for the storage of building materials (Use Class B8). The hardstanding is not required for the site to operate, and the existing lawful use has no limits on the hours of operation, what can be stored on site, or any restrictions on the height of storage.

7.21 Furthermore, having regard to the exception in paragraph 154(g), the proposal is not considered to cause substantial harm to openness of the Green Belt. The footprint of the existing building is approximately 240m² (12m x 23m) and the footprint of the proposed would be 486m² (18m x 25m). The ridge height of the

existing building measures 7 metres and the proposed would measure a maximum height of 8.5 metres. There is not considered to be a significant loss of openness as the proposed building would replace the existing building on the site and will not be substantially larger, especially when seen in the context of the neighbouring warehouse building which is approximately 4000m².

- 7.22 The views of the new hardstanding would be through the palisade fencing and from the nearby houses, therefore the views of the hardstanding would in general be limited and the effect on the openness of the wider area would be marginal.
- 7.23 The visibility of the site is relatively limited and localised with views largely experienced from Spout Lane, the allotment gardens to the south and neighbouring properties to the west. The flat topography and non-elevated position of the site would also somewhat reduce the wider spatial effects of the development on openness.
- 7.24 Overall, the proposal is not considered to constitute 'inappropriate development' in the Green Belt. The development is therefore considered acceptable on Green Belt grounds.

Grey Belt

- 7.25 It is also relevant to note that the site and surrounding area is considered to constitute 'Grey Belt' under the NPPF 2024.
- 7.26 For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.
- 7.27 As mentioned above, this area of Green Belt is not strongly performing. This would be another reason why the proposal would not constitute inappropriate development (in addition to the exception in paragraph 154g).

Design, character and appearance

- 7.28 Section 12 of the NPPF: Achieving well-designed places, refers to design and in particular that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.
- 7.29 Policy PS2 (Designing Places and Spaces) states that the Council will require a high standard in the design and layout of new development. Proposals for new development should demonstrate that they will create buildings and places that are attractive with their own distinct identity, respect and make a positive contribution to the street scene and the character of the area in which they are situated and will pay due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land.
- 7.30 The site and neighbouring warehouse site to the north (which is under the applicants ownership) share the same tarmacked apron and access from Spout Lane. It is proposed to remove and replace the existing hardstanding

with concrete across the yard area (approximately 7550m² in area) with a new tarmac access road for vehicles and paving slabs for the footpath.

- 7.31 The proposed building will replace the existing dilapidated buildings on the site to provide a new office, welfare and maintenance building. Such buildings provide essential space for construction sites, industrial facilities, and remote operations, with facilities such as a canteen, toilets and lockers.
- 7.32 The building would be single storey with a mezzanine floor constructed in metal clad material which is synonymous with modern industrial units. The building would measure approximately 18 metres by 25 metres with a maximum height of 8.5 metres, consisting of a pitched roof angled at 6 degrees with a parapet wall on the northern and southern elevation.
- 7.33 A full height glazed section is proposed on the north-east corner of the building for the proposed main entrance/reception area. Windows are proposed on the northern elevation to break up the façade and to ensure daylight into the building. Two 5 metre high sectional overhead doors are positioned on the east and west elevations to enable vehicles to enter and exit in a forward gear.
- 7.34 To the front of the building (northern elevation) a bin enclosure is proposed in closed boarded fencing material as well as a cycle storage area with steel frames and a clear sheet roof to cover this storage.
- 7.35 The development would include car parking provision for 20 cars (2 of which would be for Blue Badge holders and 4 of which would contain EV charging points. 1 HGV parking space would be provided within the office building and 10 cycle spaces are proposed at the front of the building.
- 7.36 The site is enclosed by palisade fencing, and it is proposed to install fencing along the access road. An approximate 5 metre wide and 38 metre long landscaped buffer is proposed along the western boundary of the site to provide visual screening to the neighbouring properties to the west of the site. It is proposed for this to be approximately 4-5 metres in height, which would balance screening and not to be overbearing at the end of the residential garden. This would depend on the species and management and therefore further details of this will be secured by the imposition of a condition.
- 7.37 The new building would be situated on the footprint of the existing structure and would be an improvement to the existing dilapidated structures, retaining the existing B8 use. Visually, the existing vegetation along Spout Lane, the tree planting along the site access and the set back position of the site from Spout Lane assist in screening the site. The building would be some 16 metres from Spout Lane. It is considered that the site relates more closely to the northern warehouse site given the shared access. The impact on the character of the area is therefore considered to be acceptable and complies with Policy PS2 of the Local Plan. It is also relevant to note that the Inspector in the previous appeal did not consider the hardstanding would harm the character and appearance of the area.

Amenity of neighbouring properties

- 7.38 Policy PS2 further states that proposals for new development should demonstrate that they will achieve a satisfactory relationship to adjoining properties avoiding adverse and un-neighbourly impacts in terms of loss of privacy, daylight or sunlight, or overbearing effect due to bulk and proximity or outlook.
- 7.39 The existing allotment gardens to the south of the site provides visual and physical separation to the properties further to the south of the site on Horton Road, Flintlock Close and Spout Lane.
- 7.40 The nearest residential property, 'Amberley' is situated to the west of the site. The proposed building would retain at least 40 metre separation distance with this neighbouring property, and it is considered that the proposed landscape buffer would provide mitigation to this property in relation to visual and acoustic screening. Although the new warehouse would be larger in terms of width and overall height, it is not considered to appear over dominant or overbearing when viewed in the context of the existing industrial unit to the north of the site.
- 7.41 In regards to the letters of objection received, the site is already in lawful B8 use, therefore it is not considered that the development can be said to result in an intensification of use or further industrialisation, than that could already be lawfully operated.
- 7.42 The development would have an acceptable separation distance from the properties to the south owing to the existing allotment gardens. In relation to properties 'Amberley' and 'Red Roof' which are approximately 9-18 metres to the west of site, a new landscape buffer is proposed which would help to mitigate the impact of the proposed.
- 7.43 In regards to lighting, low-level lighting will be proposed along the access roads and parking areas for vehicle movements, mainly in the winter evenings and in emergencies. The applicants have advised it would not be necessary to 'floodlight' the entire storage area. This has been added as a condition on the decision notice for further information to be provided.
- 7.44 The Council's Environmental Health Department has no objection on noise and lighting grounds and recommends conditions be added to the decision notice to protect the amenity of neighbouring residential occupiers during the construction, demolition and operational phases, in accordance with Policy EN13 and Policy EN11.
- 7.45 Overall, the proposed development is considered to have a satisfactory relationship to adjoining properties avoiding adverse and un-neighbourly impacts.

Parking provision and Highways

- 7.46 Paragraph 116 of the NPPF states development should be refused on highways grounds if there would be an unacceptable impact on highway

safety, or the cumulative impacts on the road network following mitigation, would be severe.

- 7.47 Policy ID2 (Sustainable Transport for New Development) in the Local Plan states that the Council will require development proposals to incorporate opportunities to facilitate sustainable and active modes of travel.
- 7.48 The development would formalise the parking provision to include car parking provision for 20 cars (2 of which would be for Blue Badge holders and 4 of which would contain EV charging points. 1 HGV parking space would be provided within the office building and 10 cycle spaces are proposed at the front of the building.
- 7.49 The development also promotes cycle use as an alternative means of travel to the site, reducing the need for on-site parking through the provision of a covered cycle storage to the front of the building.
- 7.50 Surrey County Council's 'Vehicular, electric vehicle and cycle parking guidance for new developments guidance' (2021), states that for B8 use storage and distribution (including open air storage) 1 car parking space is required per 100 square metres and 1 lorry space per 200 square metres. The new building would have a floorspace of approximately 576m² and, on this basis, the proposed parking provision would exceed the standards. Notwithstanding this, the application site comprises a wider storage and yard area beyond the proposed building itself, therefore the proposed level of parking is considered proportionate to the overall size of the site.
- 7.51 The Transport Statement states that the site is currently in lawful B8 Use and therefore already attracts vehicular trips, there is also no limit on the hours of operation or number of vehicles that can access the site. The applicant has advised that it is likely that the site would be used for utilities vehicles. Workers would arrive to the site to collect plant before travelling to the required works location. The provision of the proposed workshop will allow servicing of vehicles and plant to be undertaken on-site rather than having to travel off site. The presence of the workshop will therefore reduce the need for offsite trips. Whilst vehicles are predominately active during the day, there are occasions where vehicles may need to go out at night (e.g. a burst water main).
- 7.52 The Transport Statement included a trip generation exercise which provides an overview of the trip generating potential of the site under its existing use. The trip generation exercise illustrates that the site could generate up to 7 two-way movements over the morning period (7am-10am) (5 arrivals, 2 departures) and up to 6 two-way movements over the evening period (4pm-7pm) (1 arrival and 5 departures). These trips include commuting and operational trips (cars and HGVs). The trip generation exercise further shows that over a 12-hour period from 7am-7pm, 2 arrivals and 2 departures could be expected, resulting in 4 movements over the course of the average day for HGVs.
- 7.53 The County Highway Authority (CHA) have been consulted on this application and had requested that a 7 day traffic/transport count be undertaken for the

existing use to supplement those for the proposed use and provide a comprehensive multi-modal trip generation for the whole site. The applicant has advised that the site has unrestricted B8 use and therefore an established level of traffic generation. The use of the site is sporadic and varied, therefore a seven day survey is not going to be representative. The CHA consider this acceptable.

- 7.54 The LPA had requested further clarification on HGV movement. The applicants advised that a HGV is any commercial vehicle with a gross weight exceeding 3.5 tonnes (3,500 kg) and that the existing site operations typically result in an average of 10 to 12 HGV movements of a typical 'crane lorry'. This vehicle is separate from an HGV 'articulated lorry' which the applicants have stated there is only likely to be one of on site at any one time (corresponding with the one car parking space), and on many days none at all. Surrey County Council had required the submission to illustrate articulated lorry tracking, however, the applicants have advised that this is not expected to be a regular occurrence.
- 7.55 In addition, the applicants have advised that there may be up to 20 workers arriving to the site as a depot before departing to work sites for the day, returning to the depot before departing.
- 7.56 It is noted that the applicant's comments regarding the typical operation suggests a higher level of HGV activity (approximately 10–12 HGV movements per day) than the trip generation exercise. However, given that the site already benefits from an established lawful B8/storage use, the proposal is not expected to result in a material increase in vehicle movements that could already be lawfully operated.
- 7.57 The CHA was concerned the proposed hardstanding access to the storage area can only accommodate one vehicle due to its limited width. Therefore, the CHA had requested that the applicant provide tracking for 2 vehicles passing one another at this point. The applicants had advised that the access road could be increased, however, the chances of this happening are low (as the Transport Statement shows generally less than three per hour movements). If this did happen, one vehicle would have to wait and as the site entrance is some distance from the public highway this would not be a concern. The CHA are content with this and have requested that a condition be placed on the decision notice for a 1.5 metre wide footway along the main vehicular site access to provide a safe pedestrian link between existing footways on Spout Lane and into the development site.
- 7.58 The Transport Statement Swept Paths Analysis shows that a proportion of the existing open storage site would be required to ensure that HGVs could enter/exit the site in a forward gear. The CHA had requested to see where on site storage would be located to ensure that this is clear for access. The Applicants have advised that this is something that would be managed on site and these areas would not be obstructed in order to retain safe access and egress for vehicles. The CHA consider this acceptable.
- 7.59 Overall, the level of parking provision for the site is considered to be acceptable. The development would encourage sustainable transport with the provision of

cycle storage. The closest bus stop to the site is at 'Horton Road North' (approximately a 7 minute walk from the site) and is served by bus routes which stop at local areas including Stanwell Moor, Staines and Heathrow Airport which has rail and underground connections, allowing for a sustainable means of travel.

- 7.60 The CHA has raised no objection to the scheme (subject to conditions) having assessed the application on safety, capacity and policy grounds. It is to be noted that these conditions include an increase in the number of EV charging points to 10 and an increase in the number of cycle storage to 15 bikes. The proposal is therefore considered to comply with Policy ID2 of the Local Plan and the NPPF.

Flooding

- 7.61 Policy E3 (Managing Flood Risk) of the Local Plan states that applications must be supported by Flood Risk Assessments where appropriate that demonstrate the development will be safe, not increase flood risk elsewhere, and maximise opportunities to reduce flood risk from all sources.
- 7.62 It further states that all development proposals are required to demonstrate that they will not result in an increase in surface water run-off from the site ensuring the receiving drainage system is adequate to deal with flows from the site. The Council will expect Sustainable Drainage Systems (SuDS) to be included within the designs to manage surface water drainage and provide multi-functional benefits in accordance with the NPPF, unless it can be demonstrated that they are not appropriate.
- 7.63 Paragraph 182 of the NPPF states that applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal.
- 7.64 A small part of the existing access road is situated within a 1 in 1000 year flood zone risk. No changes are proposed here, with the existing tarmac access road to be retained, therefore there will be no impact on flooding as a result of the development.
- 7.65 The existing access road is also situated in close proximity to a 20 metre buffer around a river (Holme Lodge Ditch) and a small part of the access road is subject to surface water flooding. As above, no changes are proposed in this location, therefore the impact on flooding would remain as existing.
- 7.66 Following a request from the Local Lead Flood Authority the applicants have revised the scheme to relocate the surface water discharge point so that discharge is proposed downstream of the culverted section of Holme Lodge Ditch, into the open ditch along Spout Lane. Furthermore, a rainwater harvesting tank has been incorporated into the drainage design.
- 7.67 The proposed development would include permeable paving for the car parking areas. For the yard area, which is impermeable concrete, the applicants have advised that runoff from this area will be managed through

the surface water drainage system, ensuring that all rainfall is conveyed without increasing offsite flood risk. The Local Lead Flood Authority have been consulted on this application and are satisfied that the proposed surface water drainage scheme meets their requirements. Therefore, they have no objection to the proposed drainage subject to conditions.

- 7.68 The Environment Agency have been consulted on this application and have no objection to this application on flood risk grounds. They recommend informatives be attached to the decision notice.

Other Matters

Biodiversity Net Gain (BNG)

- 7.69 Policy E2 (Biodiversity) states that the Council will seek net gains in biodiversity, through creation or expansion, restoration, enhancement and management of habitats and features to improve the status of priority habitats and species.
- 7.70 Biodiversity Net Gain (BNG) is a legal requirement introduced on 12 February 2024 that requires development (unless exempt) to leave the natural environment in a measurably better condition by insisting that all sites give back a 10% biodiversity uplift. All applications are required to either provide detailed information proving there will be a biodiversity increase; or explain why the requirement does not apply to the development.
- 7.71 It is considered that the development falls into the exemption in providing BNG as the development would not impact a priority habitat and would impacts less than 25 square metres of on-site habitat and 5 metres of on-site linear habitats such as hedgerows. Moreover, no linear watercourse habitat would be impacted by the development.

Climate Change and Sustainability

- 7.72 Policy PS1 (Responding to the Climate Emergency) states that sustainable design and construction will be integral to new development in the Borough. All planning applications must include evidence that the below will be addressed, using as a minimum the Sustainable Construction Checklist.
- 7.73 The applicant has submitted an energy statement which states that air source heat pumps (ASHP) and low energy lighting would be installed as part of the development, allowing for 22.3% of the proposals energy to be provided by low/zero carbon technology. The Council's Sustainability Officer has no objection to the proposals.
- 7.74 A climate change checklist has also been submitted with this application, in accordance with Spelthorne Climate Change SPD. This checklist shows that the applicant has considered (although not limited to) the following factors: air source heat pump, building insulation measures, double/triple glazing, energy efficient lighting, cycle storage, electric charging points. Overall, the scheme performs well against the Council's SPD and climate change policies.

Archaeology

- 7.75 Policy PS3 (Heritage, Conservation and Landscape) states that proposals for development on sites which exceed 0.4ha in size. Should submit an archaeological assessment, and where appropriate the results of a site evaluation (and, should remains have been identified, an accompanying archaeological mitigation strategy) with a planning application.
- 7.76 The County Archaeology Officer has been consulted on this application and notes that no archaeological assessment was submitted with the application despite being over 0.4ha in size. The applicant has advised that the *'site is already fully covered by hardstanding and has operated in lawful B8 use for a substantial period. There is an existing building on the site, and the proposed replacement building occupies the same footprint. As such, any works are confined to an area that has already been subject to previous ground disturbance. The remainder of the site will simply be re-laid in hardstanding, with no excavation or other intrusive works proposed. The development therefore does not introduce any new ground impacts beyond the existing situation'*. Following this, the County Archaeology Officer considers that in this instance this could be dealt as a pre-commencement condition.

Minerals Safeguarded Area

- 7.77 The site is situated within a Minerals Safeguarded Area. The County Minerals and Waste department have been consulted on this application and advised that given the location of the application site and the nature and scale of the development proposed, it is unlikely that the development would result in sterilisation of mineral resources, constrain future mineral extraction, or otherwise prejudice efficient operation of existing mineral workings. The County Minerals and Waste department has raised no objection to the scheme subject to a condition which has been attached to the decision notice.

Equalities Act 2010

- 7.78 This planning application has been considered in the light of the Equality Act 2010 and associated Public Sector Equality Duty, where the Council is required to have due regard to: (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.79 The question in every case is whether the decision maker has in substance had due regard to the relevant statutory need, to see whether the duty has been performed.
- 7.80 The Council's obligation is to have due regard to the need to achieve these goals in making its decisions. Due regard means to have such regard as is appropriate in all the circumstances.
- 7.81 The NPPF defines people with disabilities as individuals that have a physical or mental impairment, which has a substantial and long-term adverse effects

on their ability to carry out normal day-to-day activities. This can include but is not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs. It is considered that it would be possible for individuals with disabilities to access the development.

Human Rights Act

- 7.82 This planning application has been considered against the provisions of the Human Rights Act 1998.
- 7.83 Under Article 6 the applicants (and those third parties who have made representations) have the right to a fair hearing and to this end full consideration will be given to their comments.
- 7.84 Article 8 and Protocol 1 of the First Article confer a right to respect private and family life and a right to the protection of property, i.e. peaceful enjoyment of one's possessions which could include a person's home, and other land and business assets.
- 7.85 In taking account of the Council policy as set out in the Spelthorne Local Plan and the NPPF and all material planning considerations, Officers have concluded on balance that the rights conferred upon the applicant/ objectors/ residents/ other interested party by Article 8 and Article 1 of the First Protocol may be interfered with, since such interference is in accordance with the law and is justified in the public interest. Any restriction of these rights posed by the approval of the application is legitimate since it is proportionate to the wider benefits of such a decision, is based upon the merits of the proposal, and falls within the margin of discretion afforded to the Council under the Town & Country Planning Acts.

Financial Considerations

- 7.86 Under S155 of the Housing and Planning Act 2016, Local Planning Authorities are now required to ensure that potential financial benefits of certain development proposals are made public when a Local Planning Authority is considering whether or not to grant planning permission for planning applications which are being determined by the Council's Planning Committee. A financial benefit must be recorded regardless of whether it is material to the Local Planning Authority's decision on a planning application, but planning officers are required to indicate their opinion as to whether the benefit is material to the application or not.
- 7.87 The proposal is not a CIL (Community Infrastructure Levy) chargeable development.

Conclusion

- 7.88 In conclusion, the development will enhance the existing dilapidated structures on the site and would retain the existing B8 Use. The development would have an acceptable impact on the Green Belt, the character of the area, the amenity of neighbouring properties and highway safety.

- 7.89 The County Highway Authority has raised no objection on highway, traffic and safety. The Environment Agency (EA) and Local Lead Flood Authority have raised no objection on flooding and drainage.
- 7.90 The application is therefore considered to be in accordance with the relevant Policies of the Spelthorne Local Plan and is recommended for approval.

Recommendation

- 8.1 The options available to the Planning Committee for decision making are:
- To approve the application as set out in this report. This option is recommended. The report analyses in some detail the reasons why the application is considered to be acceptable in planning terms.
 - To approve the application subject to additional/amended conditions and informatives. This option is not recommended, the conditions and informatives are set out below. The Planning Committee should be minded of paragraph 57 of the NPPF which states that :- *planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (National Planning Policy Framework)*.
 - To refuse the application. This option is not recommended. The report assesses why officers consider the application to be acceptable.
- 8.2 The application is recommended for approval, subject to conditions and informatives below.
- 8.3 **APPROVE** subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason:-. This condition is required by Section 91 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. No development above damp course level shall take place until details of the materials to be used for the external surfaces of the building and surface material for parking areas are submitted to and approved by the Local Planning Authority. The development shall then be constructed in accordance with the approved materials and detailing.

Reason:-. To ensure that the proposed development does not prejudice the appearance of the development and the visual amenities and character of the locality in accordance with policy PS2 of the Spelthorne Local Plan March 2026.

3. The development hereby permitted shall be carried out in accordance with the following approved plans: 25-082-101, 25-082-105, 25-082-104, 25-082-100 REV A, 25-082-102, 25-082-100, 25-082-103 REV A, received 18.12.2025.

Reason:-. For the avoidance of doubt and to ensure the development is completed as approved.

4. Prior to the occupation of the development, details of a scheme of the means of enclosure shall be submitted to and approved in writing by the Local Planning Authority indicating the positions, design, materials and type of boundary treatment to be erected. The boundary treatment shall be completed before the building is occupied. Development shall be carried out in accordance with the approved details and maintained as approved.

Reason:-. To ensure that the proposed development does not prejudice the enjoyment by neighbouring occupiers of their properties and the appearance of the locality in accordance with policy PS2 of the Spelthorne Borough Local Plan March 2026.

5. Details of a scheme of both soft and hard landscaping works shall be submitted to and approved by the Local Planning Authority prior to first occupation of any part of the development hereby approved. The approved scheme of tree and shrub planting shall be carried out prior to first occupation of the buildings and/or site. The planting so provided shall be maintained as approved for a minimum period of 5 years, such maintenance to include the replacement in the current or next planting season, whichever is the sooner, of any trees or shrubs that may die, are removed or become seriously damaged or diseased, with others of similar size and species, unless the Local Planning Authority gives written permission to any variation.

Reason:-. To minimise the loss of visual amenity occasioned by the development and to enhance the proposed development. In accordance with policy PS2 of the Spelthorne Borough Local Plan March 2026.

6. Following construction of any groundworks and foundations, no construction of development above damp-proof course level shall take place until an Energy Statement has been submitted to and approved in writing by the Local Planning Authority. The Energy Statement shall demonstrate how the development will maximum energy efficiency and minimise carbon emissions, and shall include details of proposed on-site renewable energy facilities. The measures in the agreed Energy Statement shall be implemented with the construction of the development and thereafter retained.

Reason:-. To ensure that the development is sustainable and complies with Policy PS1 of the Spelthorne Local Plan 2024- 2039/40 (March 2026).

7. The development hereby approved shall not be first opened for trading unless and until the following facilities have been provided in accordance

with a scheme to be submitted to and approved in writing by the Local Planning Authority for a minimum 1.5m wide footway along the main vehicular site access to provide a safe pedestrian link between existing footways on Spout Lane and into the development site. Thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

Reason:-. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework (2024). In accordance with Policy ID2 in Spelthorne's Local Plan 2024-2039/40 (March 2026).

8. The development hereby approved shall not be first opened for trading unless and until space has been laid out within the site in accordance with the approved plans for vehicles to be parked and for the loading and unloading of vehicles and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking / loading and unloading / turning areas shall be retained and maintained for their designated purposes.

Reason:-. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework (2024). In accordance with Policy ID2 in Spelthorne's Local Plan 2024-2039/40 (March 2026).

9. The development hereby approved shall not be occupied unless and until 10 fully operational fast-charge Electric Vehicle charging points (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) are provided in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

Reason:-. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework (2024). In accordance with Policy ID2 in Spelthorne's Local Plan 2024-2039/40 (March 2026).

10. The development hereby approved shall not be first occupied unless and until the following cycle facilities have been provided within the development site:
 - i. High quality, secure, lit and covered cycle parking for a minimum of 15 bikes;
 - ii. Charging points with timers for e-bikes within said facilities;
 - iii. Clear hardstanding routes between the cycle stores and the site access and

Reason:-. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote

sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework (2024). In accordance with Policy ID2 in Spelthorne's Local Plan 2024-2039/40 (March 2026).

11. The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must be compliant with the National standards for sustainable drainage systems and the NPPF. The required drainage details shall include:
- a) Evidence that the receiving watercourse has onward connectivity and capacity to receive flows from the site.
 - b) Evidence that the surface water drainage system meets the management of everyday rainfall (interception) requirements of the National standards.
 - c) Detailed design drawings for all sustainable drainage elements including cross sections and detailed drainage layout plan.
 - d) Hydraulic calculations to demonstrate the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40% storm events). Associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 2.0l/s.
 - e) An exceedance flow routing plan demonstrating no increase in surface water flood risk on or off site. The plan must include proposed levels and flow directions.
 - f) Details of drainage management responsibilities and maintenance regimes for all drainage elements.
 - g) Details of how surface water will be managed during construction including measures to protect on site and downstream systems prior to the final drainage system being operational. Including details of how existing watercourse on and adjacent to the site will be protected.

Reason:-. To ensure the design meets the National standards for sustainable drainage systems and the final drainage design does not increase flood risk on or off site in accordance with the requirements of the National Planning Policy Framework (2024).

12. Prior to the first use of the development, a verification report 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), confirming any defects have been rectified. Provide the details of any management company. Provide an 'As-Built' drainage layout and state the national grid reference of key drainage elements.

Reason:-. To ensure the Drainage System is designed to the National standards for sustainable drainage systems in accordance with the requirements of the National Planning Policy Framework (2024).

13. No demolition or construction works shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include measures to control noise, vibration, dust, lighting, hours of working, plant and vehicle movements, and arrangements for community

liaison. The approved CEMP shall be adhered to throughout the demolition and construction phases.

Reason:-. To protect residential amenity and in accordance with Policy EN11 of the Spelthorne Local Plan.

14. No deliveries, servicing, loading or unloading from articulated lorries (HGVs) shall take place outside the approved hours of operation (07:00 to 19:00 Monday to Saturday and no operation on Sundays or Bank Holidays unless otherwise agreed in writing by the Local Planning Authority).

Reason:-. To protect residential amenity and in accordance with Policy EN11 of the Spelthorne Local Plan.

15. Prior to first occupation of the development, a detailed external lighting scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include luminaire specifications, mounting heights, predicted lighting levels at site boundaries, hours of illumination, and measures to prevent light spill to neighbouring residential properties. The agreed lighting shall be installed prior to the occupation of the building and operated in accordance with the approved details.

Reason:-. To protect residential amenity and in accordance with Policy EN13 of the Spelthorne Local Plan.

16. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority.

Reason:-. The site retains archaeological potential. The impacts of the proposed development on that potential can be mitigated through a programme of archaeological work.

17. No development shall take place until:-
 - i. A comprehensive desk-top study, carried out to identify and evaluate all potential sources and impacts of land and/or groundwater contamination relevant to the site, has been submitted to and approved in writing by the Local Planning Authority.
 - ii. Where any such potential sources and impacts have been identified, a site investigation has been carried out to fully characterise the nature and extent of any land and/or groundwater contamination and its implications. The site investigation shall not be commenced until the extent and methodology of the site investigation have been agreed in writing with the Local Planning Authority.
 - iii. A written method statement for the remediation of land and/or groundwater contamination affecting the site shall be agreed in writing with the Local Planning Authority prior to the commencement of remediation. The method statement shall include an implementation timetable and monitoring proposals, and a remediation verification methodology.

The site shall be remediated in accordance with the approved method statement, with no deviation from the statement without the express written agreement of the Local Planning Authority.

Reason:- To protect the amenities of future occupants and the environment from the effects of potentially harmful substances.

NOTE

The requirements of the above condition must be carried out in accordance with current best practice. The applicant is therefore advised to contact Spelthorne's Pollution Control team on 01784 446251 for further advice and information before any work commences.

18. Prior to the first use or occupation of the development, and on completion of the agreed contamination remediation works, a validation report that demonstrates the effectiveness of the remediation carried out, shall be submitted to and agreed in writing by the Local Planning Authority.

Reason:- To protect the amenities of future occupants and the environment from the effects of potentially harmful substances.

19. The submission of a Site Waste Management Plan shall be submitted to and agreed in writing prior to the commencement of any groundwork or demolition activities. The Site Waste Management Plan to be implemented as approved and maintained for the duration of the construction / demolition phase of the development.

Reason:- To accord with Policy 4 of the Surrey Waste Local Plan 2020.

INFORMATIVES

1. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
2. The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.
3. Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.
4. The developer would be expected to agree a programme of implementation of all necessary statutory utility works associated with the development,

including liaison between Surrey County Council Streetworks Team, the relevant utility companies and the developer to ensure that where possible the works take the route of least disruption and occurs at least disruptive times to highway users.

5. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2024. Where undercover parking areas (multi storey car parks, basement or undercroft parking) are proposed, the developer and LPA should liaise with Building Control Teams and the Local Fire Service to understand any additional requirements. If an active connection costs on average more than £3600 to install, the developer must provide cabling (defined as a 'cabled route' within the 2022 Building Regulations) and two formal quotes from the distribution network operator showing this.
6. The applicant is expected to ensure the safe operation of all construction traffic to prevent unnecessary disturbance obstruction and inconvenience to other highway users. Care should be taken to ensure that the waiting, parking, loading and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance. The developer is also expected to require their contractors to sign up to the "Considerate Constructors Scheme" Code of Practice, (www.ccscheme.org.uk) and to follow this throughout the period of construction within the site, and within adjacent areas such as on the adjoining public highway and other areas of public realm.
7. It is the responsibility of the developer to provide e-bike charging points with standard three-point plug sockets with timers (weatherproof if outdoors) to prevent them constantly drawing a current over night or for longer than required. Signage should be considered regarding damaged or shock impacted batteries, indicating that these should not be used/charged. Where communal bike stores with e-bike charging are required, access and fire escape routes shall not be used for the storage of e-bikes whilst charging. All communal areas where e-bikes are charged must be designed to provide detection, minimise the spread of fire from the cycle store area, and be designed to be fully compliant with Building Regulations. With regard to e-bike sockets in a domestic dwelling, detection measures should be provided, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-6 for fire detection and fire alarm systems in both new and existing domestic premises. Wherever e-bikes are charged, relevant additional fire resistance measures may be necessary as required by Building Regulations.
8. The installation of outfalls and the removal of natural buffer on a watercourse will contribute cumulatively to the degradation of this waterbody. If it is necessary to install an outfall into the watercourse, it is advised that soft options are proposed, such as:
 - Outfalls cut flush with the gradient of the bank (or at a shallower gradient if the bank has been unnaturally steepened).
 - No headwalls or wingwalls if these are not necessary.

- If a headwall/wingwall is required, bespoke brickwork is preferred as this will allow the outfall to be as small necessary, to reduce the break in riparian continuity.

9. The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:
 - erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
 - altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
 - building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
 - dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
 - diverting or impounding the flow of water or changing the level of water in a main river
 - quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
 - any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
 - any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
 - any activity within 16 metres of a sea defence structure
 - activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks, or manure clamps in these places). For further guidance please visit Flood risk activities: environmental permits - GOV.UK or contact the EA National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment.agency.gov.uk.
10. 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.
11. If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.
12. Sub ground structures should be designed so they do not have an adverse effect on groundwater. If there are any further queries please contact the Flood Risk, Planning, and Consenting Team via SUDS@surreycc.gov.uk.
13. The applicant should be mindful to follow best practice dust control measures during demolition, earthworks, and construction to prevent excessive dust emissions.
14. You are advised that the Council will expect the following measures to be taken during any building operations to control noise, pollution and parking:

- (a) Work that is audible beyond the site boundary should only be carried out between 08:00hrs to 18:00hrs Monday to Friday, 08:00hrs to 13:00hrs Saturday and not at all on Sundays or any Public and/or Bank Holidays;
- (b) The quietest available items of plant and machinery should be used on site. Where permanently sited equipment such as generators are necessary, they should be enclosed to reduce noise levels;
- (c) Deliveries should only be received within the hours detailed in (a) above;
- (d) Adequate steps should be taken to prevent dust-causing nuisance beyond the site boundary. Such uses include the use of hoses to damp down stockpiles of materials, which are likely to generate airborne dust, to damp down during stone/slab cutting; and the use of bowzers and wheel washes;
- (e) There should be no burning on site;
- (f) Only minimal security lighting should be used outside the hours stated above; and
- (g) Building materials and machinery should not be stored on the highway and contractors' vehicles should be parked with care so as not to cause an obstruction or block visibility on the highway.

Further details of these noise and pollution measures can be obtained from the Council's Environmental Health Services Unit. In order to meet these requirements and to promote good neighbourliness, the Council recommends that this site is registered with the Considerate Constructors Scheme (www.ccscheme.org.uk/index.php/site-registration).

15. The applicant is advised that the essential requirements for an acceptable communication plan forming part of a Method of Construction Statement are viewed as:
 - (a) how those likely to be affected by the site's activities are identified and how they will be informed about the project, site activities and programme;
 - (b) how neighbours will be notified prior to any noisy/disruptive work or of any significant changes to site activity that may affect them;
 - (c) the arrangements that will be in place to ensure a reasonable telephone response during working hours;
 - (d) the name and contact details of the site manager who will be able to deal with complaints; and
 - (e) how those who are interested in or affected will be routinely advised regarding the progress of the work. Registration and operation of the site to the standards set by the Considerate Constructors Scheme (<http://www.ccscheme.org.uk/>) would help fulfil these requirements.
16. Due to the site being within 6km of Heathrow Airport the crane operator is required to submit all crane details such as maximum height, operating radius, name, and phone number of site manager along with installation and dismantling dates to the CAA Airspace Coordination and Obstacle Management Service (ACOMS) system. For notification, please follow the link via CAA website: (caa.co.uk) Once crane notification has been received from the CAA, Heathrow Works Approval Team will assess and issue the necessary crane permit. No cranes should operate on site until a crane permit has been issued. Specific CAA guidance for crane lighting/markings is given in CAP1096: Guidance to crane users on the crane notification process and obstacle lighting and marking.

17. The development is close to the aerodrome and the approach to the runway. We draw attention to the need to carefully design lighting proposals. This is further explained in CAST Advice Note 2, 'Lighting near Aerodromes' (available at [CAST Advice Notes | Civil Aviation Authority](#)). Please note that the Air Navigation Order 2005, Article 135 grants the Civil Aviation Authority power to serve notice to extinguish or screen lighting which may endanger aircraft.
18. Please note that the proposal falls within the Draft Order Limit boundary to expand the airport with a third runway to the north west of the airport. The Draft Order Limit was subject to a scoping opinion by the Planning Inspectorate dated 10 October 2025.