



GERALDEVE

Addendum Town Planning Statement
The Former Stag Brewery, Mortlake

On behalf of: Reselton Properties Limited

May 2019

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1 Executive Summary

- 1.1 This Addendum Town Planning Statement has been prepared in support of proposed amendments to the Stag Brewery scheme, which is currently under consideration by the London Borough of Richmond Upon Thames.
- 1.2 Since submission of the Stag Brewery Applications in February 2018, an extensive process of consultation has occurred with statutory and non-statutory consultees. As a result of this consultation, a number of documents have been provided to relevant consultees to either provide clarification / further information on certain elements, or provide revised information where the scheme has been amended.
- 1.3 A package of documents has been prepared by the Applicant's project team for formal submission to LBRuT. These documents include the proposed amendments to the scheme, and, where relevant, updated documents following the consultation process.
- 1.4 The amendments proposed are relatively minor within the context of the scheme and broadly speaking positively respond to consultee comments.
- 1.5 The Town Planning Statement submitted with the Applications in February 2018 concluded that the proposed development is in accordance with relevant strategic and local policy objectives, and specific policy criteria. These include strategic policy objectives around housing delivery, mixed use sustainable development and place-making. This Addendum Statement considers the proposed amendments and concludes that the amendments do not alter this conclusion – the scheme is still considered to be in accordance with relevant strategic and local policy objectives, and specific policy criteria.
- 1.6 This document should be read alongside the submitted substitution and revised documents as well as the February 2018 Town Planning Statement.

2 Introduction

- 2.1 This Addendum Town Planning Statement (“the Addendum Statement”) has been prepared by Gerald Eve LLP on behalf of Reselton Properties Limited (“the Applicant”) in support of three linked planning applications (“the Applications”) for the comprehensive redevelopment of the former Stag Brewery Site in Mortlake (“the Site”) within the London Borough of Richmond Upon Thames (“LBRuT”).
- 2.2 The Applications were submitted on 19 February 2018 (refs. 18/0547/FUL (“Application A”), 18/0548/FUL (“Application B”) and 18/0549/FUL (“Application C”). Since this time, extensive post-submission consultation has taken place with statutory consultees, LBRuT and the Greater London Authority (“the GLA”). In response to these consultation comments, a number of documents have been prepared – some have expanded upon the information submitted within the February 2018 applications and some have made minor scheme amendments.
- 1.7 This Addendum Statement has been prepared following this process of consultation and seeks to:
- a) Set out the post-submission consultation process;
 - b) Set out the proposed scheme amendments arising as a result of this consultation; and
 - c) Assess the acceptability of the proposed amendments against relevant planning policy.
- 2.3 In terms of the assessment section, this Addendum Statement only considers the proposed amendments and provides clarification where this has been deemed necessary. This Addendum Statement does not consider the whole scheme against relevant planning policy – this assessment can be found within the submitted Town Planning Statement (“the February 2018 Statement”) submitted in support of the Applications, dated February 2018. This Addendum Statement should be read alongside the February 2018 Statement, as well as the other documents prepared to set out and assess the proposed amendments, which are listed at section 3.4.

3 Post-Submission Consultation

3.1 This Section sets out the post-submission consultation carried out with statutory consultees, LBRuT and the GLA following the submission of the Applications. It sets out where further information was provided for clarification / further explanation and where scheme amendments have subsequently been made in response to the comments. These amendments are then considered against relevant planning policy in the subsequent sections of this Addendum Statement.

3.2 Consultation comments have been received from a number of bodies on the Applications, as set out in the table below. The table below also sets out where documents have been provided for clarification / further explanation in response to comments received, and where the scheme has been amended following the consultee comments:

Consultee	Documents provided within this addendum submission for further clarification / explanation?	Documents provided which amended scheme details?
The Environment Agency (“the EA”)	Yes	Yes
Network Rail	Yes	No
Sport England	Yes	Yes
Transport for London (“TfL”)	Yes	Yes
Thames Water	Yes	No
Natural England	No	No

Greater London Archaeology Advisory Service ("GLAAS")	No	No
Historic England	No	No
The GLA		
a) General planning matters (Stage 1)	Yes	Yes
b) Viability	Yes	No
c) Energy	Yes	No
d) Flooding	Yes	No
e) Air Quality	Yes	Yes
LBRuT		
f) Noise and vibration	Yes	No
g) Odours	No	No
h) Air Quality	Yes	No
i) Trees	Yes	Yes
j) Ecology	Yes	Yes
k) Affordable housing / viability	Yes	No
l) Planning	Yes	Yes

m) Design and conservation	Yes	Yes
n) Transport	Yes	Yes
o) CIL / Section 106 Heads of Terms	No	No
Royal Mail	No	No
The Port of London Authority ('PLA')	Yes	No

Table 1: Consultee response summary

3.3 These consultee comments are considered in turn below. Where there is an overlap in comments, for example, viability matters have been discussed jointly with LBRuT and the GLA, these have been considered together. Any resulting changes are then considered against relevant planning policy considerations.

3.4 A tracker has been included at Appendix A setting out the consultation process with the above stakeholders.

Revised documentation

3.5 A schedule has been included at Appendix 1 of the submitted covering letter (May 2019) which sets out a detailed list of all documents which have been revised following the February 2018 submission. The below sets out a high level summary of the documents which have been amended:

Application A (ref. 18/0547/FUL)

- a) Design Addendum, prepared by Squire and Partners, dated March 2019 (to be read alongside the February 2018 submitted Design and Access Statement);
- b) Updated area and compliance schedules, prepared by Squire and Partners (to replace the schedules submitted in February 2018);

- c) Addendum Landscape Design and Access Statement, prepared by Gillespies, dated April 2019 (to replace the February 2018 Landscape Design and Access Statement);
- d) Revised proposed detailed drawings, prepared by Squire and Partners (to replace those relevant drawings submitted in February 2018);
- e) Revised proposed parameter plans, prepared by Squire and Partners (to replace those relevant drawings submitted in February 2018);
- f) Revised proposed landscape drawings, prepared by Gillespies (to replace those relevant drawings submitted in February 2018);
- g) Financial Viability Assessment Addendum, prepared by BNP Paribas, dated 25 March 2019 (to be read alongside the February 2018 submitted Financial Viability Assessment);
- h) Revised Open Space and Playing Pitches Assessment, prepared by Gerald Eve LLP, with updated Appendix 16 prepared by SLC (Appendix 16 updated) (to replace the February 2018 Open Space and Playing Pitches Assessment);
- i) Addendum Town Planning Statement, prepared by Gerald Eve LLP, dated 3 May 2019 (to be read alongside the February 2018 submitted Town Planning Statement);
- j) Revised Arboricultural Survey Report and Impact Assessment, prepared by Watermans, dated April 2019 (to replace the February 2018 submitted Arboricultural Survey Report and Impact Assessment);
- k) Revised Internal Daylight and Sunlight Report, prepared by EB7 updated April 2019 (to replace the February 2018 submitted Internal Daylight and Sunlight Report);
- l) Transport Assessment Addendum, prepared by Peter Brett Associates, dated April 2019 (to be read alongside the February 2018 submitted Transport Assessment);
- m) Revised Design and Access Statement Volume 3: Design Code, prepared by Squire and Partners, dated April 2019 (to replace the February 2018 submitted

Design and Access Statement Volume 3: Design Code); and

- n) Environmental Statement Addendum and non-technical summary, prepared by Watermans, dated May 2019 (to be read alongside the February 2018 submitted Environment Statement).

Application B (ref. 18/0548/FUL)

All of the documents substituted in respect of Application A, plus:

- o) Revised Landscape Proposals Design and Access Statement, prepared by Gillespies, dated 3 May 2019 (to replace the February 2018 Landscape Design and Access Statement);
- p) Revised proposed landscape drawings, prepared by Gillespies (to replace those relevant drawings submitted in February 2018);and
- q) Revised proposed detailed drawings, prepared by Squire and Partners (to replace those relevant drawings submitted in February 2018).

Application C (ref. 18/0549/FUL)

All of the documents substituted in respect of Application A, plus:

- r) Revised Landscape Design and Access Statement, prepared by Gillespies, dated 2 May 2019 (to replace the February 2018 Landscape Design and Access Statement); and
- s) Landscape drawings, prepared by Gillespies, dated (to replace those relevant drawings submitted in February 2018).

4 Post-Submission Amendments

4.1 The documents submitted alongside this Statement set out the proposed amendments to the scheme in detail following the post-submission consultation stage (as set out in Section 3 of this Statement). For ease, a summary of the proposed amendments is set out below as follows:

- a) Residential provision (amendments to Development Area 1, east of Ship Lane only):
 - i. Reduction in number of units by 4;
 - ii. Amended unit mix and unit sizes; and
 - iii. Changes to amenity space provision.
- b) Design (also see section 14):
 - i. Turret design;
 - ii. Amendments to proposed elevations, façades and internal elements of buildings;
 - iii. Amendment to design of the proposed water sports centre / boat house (block 9);
- c) Landscaping and signage amendments;
- d) Increased cycle parking provision;
- e) Changes to the flexible floorspace limits for office and retail;
- f) Minor amendments to floorspace areas; and
- g) Replacement climber planting on the street frontage at Chalkers Corner is now proposed.

4.2 A full list has been provided within the submitted Environmental Statement (“ES”)

addendum and the changes are detailed within the submitted design documents.

5 Environment Agency

- 5.1 Initial comments on Application A from the EA were received in May 2018 with additional comments provided in September 2018. Waterman Group provided a written response to these comments on 30 October 2019 and a meeting to discuss the issues was held on 3 December 2018.
- 5.2 The principal areas of discussion for Application A were -
- h) How a permanent passive flood defence could be incorporated into Ship Lane – a solution of raising the ground levels in line with future EA requirements was agreed.
 - i) Bulls Alley – permanent passive flood defences should be incorporated. The design team has subsequently re-designed the Boat House (Block 9) so that the building's external walls provide defence, and confirmed that it would be possible to raise the level defence of Bulls Alley in the future via a ramp, gate or a wall, if required.
- 5.3 A final response closing out the above issues was provided by Waterman Group on 11 January 2019.
- 5.4 In terms of Application B, the EA sought clarification on the finished floor levels of the school. These were provided by Hydro-Logic Services on 27 June 2018.
- 5.5 The EA confirmed on 25 April 2018 that Application C was considered to have low environmental risk and therefore they had no comments on these proposals.
- 5.6 Following the meeting with the EA on the 3rd December 2018 the team have revisited the design, ensuring that the proposed development does not limit the potential for passive flood defence options on both Ship Lane and Bulls Alley. Furthermore, the revised layout of the Boat House ensures a permanent passive protection to 6.70m AOD as well as improving access to the defence for inspections.
- 5.7 **Planning Assessment:** It is considered that the additional work undertaken satisfies the EA's requirements but does not require additional assessment over and

above that which was provided in the February 2018 Planning Statement.

6 Network Rail

- 6.1 Discussions between Network Rail and the applicant have been ongoing since June 2017 with numerous meetings during this time. A final conference call took place with Peter Brett Associates (“PBA”) and Network Rail on 13 December 2018 with final correspondence dated 11 January 2019.
- 6.2 The principal issue to date has been the operation and safety of the Mortlake level crossing in terms of vehicle and pedestrian conflicts, with LBRuT unprepared to accept closure of the crossing as per Network Rail’s preferences.
- 6.3 PBA’s Technical Note ‘Level Crossing Analysis’ dated 28 January 2018 set out the likely impacts of the Stag Brewery development on the crossing based upon a detailed assessment of the likely movement of people and vehicles associated with the development and the outcome of highway modelling based on the TfL Strategic Highway Model (SOLHAM). It concluded that the impacts of the development would be modest and that the footbridge and the level crossing would continue to operate within recommended standards.
- 6.4 Notwithstanding this technical analysis of the proposed development, it has been agreed that a range of enhancements to the level crossing would improve its safety and operation. These may include some or all of the following:
- a) Additional bridge signage;
 - b) Additional lighting; and
 - c) Reconfiguring the bollards on North and South Worple Way to improve the pedestrian environment and general improvements to Sheen Lane to prioritise pedestrian and cycle movements.
- 6.5 **Planning Assessment:** As part of the development proposals a substantial enhancement to the Chalker’s Corner Junction has been proposed which would reduce the reliance of the area on Sheen Lane as a vehicular access route to Mortlake. TfL has agreed the proposed improvements at Chalkers Corner. In addition, it is understood that LBRuT are progressing proposals for an extensive 20mph zone in the area to include Sheen Lane. The Applicant’s proposals for

Mortlake High street and the northern end of Sheen Lane would complement this new speed limit and will help to prioritise the movement of pedestrians and cycles ahead of vehicles in this area. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

- 6.6 Further improvements to the Mortlake level crossing would need a programme of funding which has yet to be sourced.

7 Sport England

7.1 LBRuT issued the Sport England comments on Applications A and B to the Application on 2 May 2018 (Sport England emails dated 30 April 2018). Sport England objected to the Applications but considered that the Applications had the potential to meet exception 5 of Sport England's adopted Playing Fields Policy. The Sport England email noted that they would withdraw the objection if further details of the design of the sports facilities were provided and the local authority imposes the suggested planning conditions.

7.2 In summary, the Sport England objection requested / noted the following:

- a) It was recognised that the sports lighting proposed fell below the Football Association ("FA") recommended average lux levels. However, given that the matches will generally be at weekends and weeknights and would consist of training, the FA were willing to accept lower lux levels as proposed by the Applicant provided that evening use is permitted;
- b) A robust Community Use Agreement and Pricing Policy that is agreed by Barnes Eagles FC would be required. This would need to identify Barnes Eagles as a user group;
- c) Access for Barnes Eagles to a pitch during the construction period should be provided, along with permanent access to another site once the second pitch is lost;
- d) A more detailed plan of the artificial pitch and the MUGA was requested, which should include pitch and court dimensions and include goal recesses and details of the fencing;
- e) It was noted that Sport England's preference for the floodlighting would be for the floodlights to be in operation until 10pm;
- f) The scheme may require additional acoustic measures to mitigate any impact on nearby properties;
- g) It was requested that the Multi Use Games Area ("MUGA") be provided with ducting for power cables should floodlighting be required in the future. The

ducting could be dealt with via condition; and

- h) A number of conditions were suggested including compliance with plans, quality of astro turf, community use agreement, hours of sports pitch use and lighting and a management and maintenance scheme.

7.3 The Applicant's team has carefully considered Sport England's comments and proposes the following:

- a) The Section 106 agreement would include a Head of Terms for a Barnes Eagles licence which will ensure:
 - i. Temporary licence by the football club up to the point of development;
 - ii. A contribution for use by Barnes Eagles either towards temporary pitches during construction or for future costs;
- b) A Community Use Agreement for use of the sports facilities;
- c) Additional drawings provided as requested;
- d) Floodlighting and use of the facilities up to 9pm (Monday to Saturday) and up to 8pm on Sundays and Bank Holidays. The reduced hours (compared to the Sport England suggestion) is following comments from LBRuT officers. It is still considered that these hours would ensure significant additional capacity compared with the current facilities and balances community needs with the impact on neighbouring residential properties;
- e) Ducting of cables to be secured by condition; and
- f) Acoustic measures to be implemented as part of a condition detail.

7.4 Discussions are still ongoing with Barnes Eagles and Sport England and these conclusions have not yet been finalised.

7.5 As set out below in section 14 of this report, LBRuT also provided comments in respect of the proposed sports facilities. As a result of these comments, amendments were made to the proposed landscape drawings and landscape DAS to take account of changes to materials and clarifications in respect of sports pitch

dimensions and updated cycle parking numbers. In addition, the submitted Open Space and Playing Pitches Assessment (“OSPPA”) has been updated to incorporate an updated briefing paper prepared by SLC (Appendix 16). The updated paper reflects updated hours of use of the sports facilities and sports pitch dimensions.

7.6 **Planning assessment:** The proposals for the sports facilities remain broadly as per those set out in the February 2018 Statement and the submitted OSPPA. It is therefore considered that the policy assessment remains as per the February 2018 submission, and that the proposals are in line with relevant open space and sporting planning policy.

8 Transport for London

- 8.1 TfL provided initial comments on the applications on 21 May 2018. PBA provided a written response on 13 July and met with TfL on 9 August to discuss the comments. TfL's final position was issued in writing on 9 November 2018.
- 8.2 TfL acknowledged that the proposed residential car parking provision accords with both the London Plan and draft London Plan, however encouraged the applicant to further reduce car parking levels given the congested nature of the road network.
- 8.3 TfL requested confirmation that the cycle parking provision proposed for all uses will be provided in accordance with the London Plan and draft London Plan minimum standards.
- 8.4 TfL are seeking a contribution towards bus capacity improvements for the school and the residential development and for replacement trees and bus stop alterations. TfL are also seeking a parcel of land to be safeguarded to accommodate a potential future bus stand. These requirements are the subject of ongoing discussions as part of the wider section 106 discussions.
- 8.5 **Planning Assessment:** The proposed car parking levels remain in accordance with the development plan for the site. The applicant confirms that the cycle parking for all proposed uses has been designed to comply with London Plan and draft London Plan standards and this is demonstrated on the resubmitted plans. Other matters will be secured via the section 106 legal agreement in negotiation with TfL and LBRuT. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

9 Thames Water

9.1 Thames Water provided written comments (ref: 57651) to LBRuT on 15 May 2018 and a letter dated 17th November 2017 (DS ref: DS6041414). The comments followed on from pre-application discussions where Thames Water raised no objections in principle to the scheme. Clarification on the details for waste water diversions at the site and piling methodology details were sought and draft planning conditions were presented for comment and agreement.

9.2 A draft response was issued to Thames Water (via LBRuT) on 25 September 2018. Further to the issue of this draft response Thames Water suggested draft condition wording in an email, dated 6 February 2019. A final response to the condition wording was provided by the applicant on 19 February 2019 to Thames Water directly via email. Thames Water agreed the final wording on 6 March 2019. The final wording is:

“No construction related activities shall take place within 5m of the trunk water main unless otherwise agreed with the local planning authority in consultation with Thames Water. Information detailing how the development will be carried out so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works”.

9.3 Furthermore, as a result of the agreement of the condition wording stated at Paragraph 9.2, Thames Water confirmed its ability to support the applications.

9.4 **Planning Assessment:** The consultation with Thames Water did not result in any amendments to the submitted scheme. Thames Water also do not object to the scheme. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

10 Natural England

- 10.1 Natural England provided written comments to LBRuT on 19 April 2018 (refs: 243734; 243740 and 243748). Clarification on how the proposals had considered protected landscapes and the scope of the proposed landscape enhancements was sought.
- 10.2 Draft responses pursuant to each Application were issued to Natural England (via LBRuT) on 14 August 2018. Further draft responses in respect of Applications A and B were issued to Natural England (via LBRuT) on 21 August 2018. The responses clarified how the proposals had considered protected landscapes and set out the scope of the proposed landscape enhancements in terms of:
- a) The towpath;
 - b) Public access to the site and open spaces; and
 - c) Biodiversity.
- 10.3 **Planning Assessment:** The consultation with Natural England did not result in any amendments to the submitted scheme. Natural England also do not object to the scheme. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

11 Greater London Archaeology Advisory Service

- 11.1 The GLAAS provided written responses in respect of Applications A and B to LBRuT on 19 April 2018 (refs: CLO26146 and CLO26147). The responses put forward suggested planning conditions for review and/or comment/agreement. The suggested planning conditions sought:
- a) A Stage 1 Written Scheme of Investigation to be submitted to, and approved by, LBRuT; and
 - b) A Stage 1 Historic Building Written Scheme of Investigation to be submitted to, and approved by, LBRuT (Application A only).
- 11.2 The GLAAS responses went on to state that the applications would be acceptable to the GLAAS should the conditions be imposed as they would ensure the conservation of archaeological interest at the site.
- 11.3 On 31 July 2018 the applicant confirmed (via email to LBRuT) that the conditions proposed within the GLAAS responses were acceptable.
- 11.4 **Planning Assessment:** The consultation with The GLAAS did not result in any amendments to the submitted scheme. The GLAAS also do not object to the scheme. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

12 Historic England

- 12.1 Historic England provided written responses to Applications A, B and C on 17 April 2018 (refs: P00861810; P00862410 and P00862630). Historic England confirmed that Applications A and B should be determined in accordance with national and local policy guidance, and on the basis of the LBRuT's specialist conservation advice and that it was not necessary for Historic England to be consulted again on the Applications. Historic England confirmed that it was not necessary for them to be consulted on Application C.
- 12.2 It was not necessary for the Applicant to provide a response to Historic England's consultation letters.
- 12.3 **Planning Assessment:** The consultation with Historic England did not result in any amendments to the submitted scheme. Historic England do not object to the scheme and also do not require any further consultation on the scheme as per their responses, dated 17 April 2018. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

13 The GLA

General planning matters (Stage 1)

13.1 The GLA issued the Stage 1 report on 1 August 2018 (dated 30 July 2018). The strategic issues are summarised as follows:

- a) The principle of redevelopment of the brownfield site for mixed use development was supported. The partial loss of playing fields and open space, in view of the education use and qualitative improvements to sports facilities provided by the development, was considered to be justified provided that a comprehensive community is secured.
- b) The proposed level of affordable housing (which the GLA considers should take into account the 150 flexible assisted living / residential units which must make an affordable housing contribution) was considered unacceptable in the context of the low value ex-industrial site and the significant uplift in value represented by the proposed development.
- c) The overall approach to the masterplan, layout and approach to scale and massing was supported. Further amendments were suggested to secure appropriate residential quality and the highest standard of urban design and architecture to be carried forward to the outline phases.
- d) Further clarifications and revisions were required to the energy assessment and the sustainable drainage strategy to ensure compliance with planning policy.
- e) The transport comments largely mirrored the TfL comments on the scheme, i.e. there should be a reduction to the parking, further highways impact modelling and a Healthy Streets assessment of the Chalker's Corner proposals. In addition, financial contributions to bus service improvements and conditions and planning obligations are required.

13.2 A response was issued by the Applicant's team on 26 September 2018. The response set out the following:

- a) Playing fields – an update on the discussions and the further information /

Community Use Agreement was provided.

- b) Housing / Viability – the following points were set out:
- i. That the Applicant’s advisors were in the process of discussing the outstanding viability matters with the Council’s advisors and reviewing whether there was scope for the scheme to deliver additional affordable housing through construction cost savings. It was intended that there would be further discussions on viability.
 - ii. That the Applicant disagreed with the GLA’s assertion that the proposed assisted living units are Class C3, not Class C2. It was noted that this assertion was based upon draft London Plan Policy (which at the time had not undergone examination) and supplementary planning guidance, which holds limited weight. Notwithstanding this, as the proposal is for up to 150 flexible Use Class C3/C2 units, the viability assessment identifies the relevant blocks as ‘extra care accommodation’ but attaches similar values to these areas as per the residential accommodation.
 - iii. That the Applicant disagreed with officer’s comments in respect of Vacant Building Credit.
 - iv. That the proposed unit mix is acceptable in strategic terms. It was noted that the Applicant’s team were in the process of reviewing the proposed mix to determine whether a revised mix could facilitate additional affordable housing.
 - v. It was confirmed that the up to 150 flexible assisted living / residential units would meet and exceed the GLA’s residential space standards.
- c) Urban Design – a note was prepared by Squire & Partners and issued within the Applicant’s response which provided a point by point response to matters raised. No scheme amendments were made as a result of the comments – only amendments to the Design Code document. No amendment was made to the parameter plans as no flexible uses are proposed within the outline area. The Design Code comments have been addressed in the revised pack of information included within this submission.
- d) Energy – as set out below, a Design Note was prepared by the Applicant’s

energy consultants to respond to the comments raised in the Stage 1 response and the separate energy memo.

- e) Flood risk, drainage and water use – as set out below, a response was prepared in respect of the flood risk, drainage and water use comments.
- f) Transport – as the GLA Stage 1 comments mirrored those received by TfL, dated 21 May 2018, a note was provided to the GLA which provided an update in respect of the ongoing discussions with TfL.
- g) Air Quality – as set out below, air quality comments were not included within the Stage 1 report but were received separately in a memo dated 6 September 2018. Watermans prepared a detailed response to all points raised, which was submitted.

13.3 **Planning assessment:** As a result of the GLA Stage 1 comments, and other consultee comments received on the Applications, some scheme amendments have been made and further information / clarification provided on other points. Further detail on these amendments / clarification points is set out within the relevant sections of this Statement. In summary, it is considered that the resulting scheme amendments are acceptable in planning policy terms.

Viability

- 13.4 Initial comments on the viability and affordable housing position were received from the GLA on 28 February 2018. A response to these comments was prepared by the Applicant's viability consultant, BNP Paribas, and issued to the GLA on 2 March 2018.
- 13.5 The GLA's Stage 1 report (dated 30 July 2018) also set out comments in respect of viability. It was agreed that these comments would be picked up and addressed by the Applicant through further discussions with LBRuT's viability consultant and then the GLA.
- 13.6 For full details of the discussions and subsequent planning assessment of the viability position, please see sections 14.38 – 14.46 of this report, which cover the

LBRuT affordable housing and viability discussions.

Energy

- 13.7 The energy strategy was developed following pre-application discussions with GLA energy officers in February 2017. Formal comments on the February 2018 submission were received by the Applicant within the Stage 1 report (dated 30 July 2018). An energy memo containing further detailed comments in respect of energy was also issued (dated 2 July 2018). In summary, the GLA energy officer requested that:
- a) The Applicant consider the scope for additional measures aimed at achieving further carbon reductions prior to ensuring that any carbon shortfall is met through a contribution to the borough's offset fund;
 - b) Further clarification and justification for the proposed energy strategy is provided. In particular, further justification should be submitted to support the multiple energy centre proposals and further investigation should be undertaken to consider how the number of energy centres can be minimised; and
 - c) Further information on the CHP should be provided, and consideration of a single CHP engine for the whole site or consideration of more appropriate heating technologies for the site.
- 13.8 A note was prepared by the Applicant's energy consultant, Hoare Lea, dated 31 August 2018 and issued on 26 September 2018 to the GLA which sought to address all comments raised on a point by point basis. Further detailed technical comments were issued by the GLA to the Applicant on the energy strategy on 25 October 2018. Hoare Lea then prepared a follow up note in response to these queries which was issued on 19 November 2018 (dated 12 November 2018).
- 13.9 A meeting was arranged with the GLA (planning and energy case officers), the LBRuT case officer and the Applicant's project team, led by Hoare Lea, for 15 January 2019. At the meeting, the responses were discussed and the GLA noted that further justification and explanation would need to be provided by the Applicant. It was agreed that an addendum to the Energy Strategy would be prepared and issued to the GLA/LBRuT. This document was accordingly prepared by Hoare Lea

and issued on 1 February 2019.

- 13.10 The GLA reviewed the addendum and requested further information and explanation on the energy strategy via email on 18 February 2019. A point by point response to the information requested was provided by Hoare Lea and issued on 23 March 2019. Further feedback was then received from the GLA on 3 April 2019 requesting that further information be provided, and the energy strategy proposals be re-considered.
- 13.11 Accordingly, Hoare Lea have prepared a fuller addendum document, which has been submitted within this revised package of information. In summary, the addendum document sets out:
- a) Revised energy and carbon emissions calculations on the basis of amendments to the energy strategy as discussed with the GLA;
 - b) The previous addendum note;
 - c) A comments tracker detailing the liaison with the GLA; and
 - d) Appendices containing further information as requested.
- 13.12 Discussions are ongoing with the GLA in respect of the proposed energy strategy.
- 13.13 No changes to the submitted plans are required as a result of the re-consideration of the energy strategy.
- 13.14 **Planning Assessment:** Potential amendments to the energy strategy have been made in response to comments raised by the GLA. The potential amendments to the areas submitted in outline will make the scheme perform better in carbon saving terms than under the February 2018 submission. Therefore, it is considered that the planning assessment of energy performance remains as per the February 2018 Statement, i.e. in accordance with relevant planning policy.

Flood risk, drainage and water use

- 13.15 The GLA's flood risk, drainage and water use officer issued a first set of comments to the Applicant on 18 June 2018. Comments were also included within the GLA's Stage 1 comments (paragraphs 70-72, issued on 30 July 2018). The Stage 1 comments sought further justification on the drainage strategy to ensure compliance with London Plan Policy 5.13 and draft Policy SI13.
- 13.16 The Applicant provided a draft response to comments on 24 August 2018 via LBRuT which responded to points regarding: surface water management in respect of the proposed basement, surface water run-off and green roofs; and flood risk in respect of the finish floor levels, surface water flooding, The Flood Emergency Plan and proposed planning conditions relating to the need for increased flood defences, inclusion of property level protection measures and the future Ship Lane flood gate will be required.
- 13.17 On 26 September, the Applicant provided a further draft response, dated 10 September 2018, directly addressing the comments raised in the GLA's Stage 1 letter.
- 13.18 The GLA provided further comments on 25 October 2018. The Applicant responded on 1 November 2018. The response provided further details on the optimisation of the drainage design.
- 13.19 On 28 November 2018, the GLA requested further detail on the last outstanding matter via email to Gerald Eve LLP. The response sought clarifications on the proposed discharge rate where the site will drain to the public sewer. It was agreed that the Applicant would provide a Briefing Note summarising the permeable paving extents, attenuation estimates within the permeable paving, removing the artificial pitch from surface water calculations and the SuDS proposed. This note was provided to the GLA on 8 January 2019. On 8 February 2019 the GLA planning officer confirmed the Briefing Note, dated 8 January 2019, addressed outstanding issues on drainage.
- 13.20 **Planning Assessment:** The consultation with GLA Flood risk, drainage and water use resulted in amendments to the submitted drainage strategy, an addendum of

which has been submitted within this substitution pack. GLA Flood risk, drainage and water use do not object to the scheme. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

Air Quality

- 13.21 The GLA provided a written response to the Applications in terms of Air Quality on 18 June 2018. The comments sought further clarification on model verification, other point sources, future sensitivity scenario, cumulative assessment, energy and traffic emissions, modelled receptor figure, display of impacts, future impacts and mitigation measures.
- 13.22 The Applicant provided a draft response on 24 August 2018 which provided clarification to all the points raised. No further response has been received.
- 13.23 Amendments have been made to the submitted air quality assessment contained within the 2018 ES. These amendments are explained in section 14 of this report in the context of LBRuT's comments in respect of air quality.

14 London Borough of Richmond Upon Thames

Noise and Vibration

- 14.1 Comments in respect of noise and vibration were issued by LBRuT on 24 May 2018 (dated 22 May 2018) as part of the wider Environmental Assessment Review (Noise, Vibration, Air Quality, Dust and Odour). The comments related to the submitted noise impact assessment prepared by Waterman and submitted as part of the ES and the Noise Impact Assessment prepared by Hoare Lea, both submitted with the February 2018 Applications.
- 14.2 LBRuT's comments requested:
- a) Additional short term monitoring and meteorological data to support the submitted assessments;
 - b) Greater details regarding the noise impacts associated with the Chalkers Corner works were requested;
 - c) The inclusion of demolition/construction periods within the Waterman reports;
 - d) Further details of mitigation calculations
 - e) Further assessment of construction traffic movement options and piling methods; and
 - f) Inclusion of the activity period in the assessment of significance. i.e. use of MUG/AGP during normal school hours is generally more acceptable.
- 14.3 LBRuT's comments also queried Waterman's findings in respect of Williams Lane noise impacts and suggested end user restrictions for the proposed development. Conditions were proposed regarding the demolition, construction and operational phases of the development.
- 14.4 The Applicant issued a first response to the comments received on 8 June 2018.
- 14.5 A meeting was held on 15 June 2018 and a note was issued to LBRuT on 30 August 2018 summarising and responding to the discussions. The note re-presented

information regarding Application C and the calculation methodology for the Chalkers Corner noise assessment and demonstrated that the changes in environmental noise level as a result of the proposals are predominantly insignificant with some beneficial effects on the Chalkers Corner façade. The note also set out that, with the provision of mitigation at Chalkers Corner in the form of the proposed 2m high solid wall, the predicted increase would be off-set/reduced. Elsewhere the note addressed comments raised in respect of the MUGA/AGP proposed within Application B. The note concluded that the noise impacts would be controlled through careful management of their use, design and a restriction in operational hours.

- 14.6 On 25 October 2018 a further comment was received from LBRuT via email. Part (b) of the email confirmed LBRuT's agreement that physical and managerial mitigation, implemented as part of the scheme would overcome noise concerns and required a condition be applied to any planning permission in respect of the proposed MUGA.
- 14.7 Part (a) of the comment requested further clarification regarding the road traffic noise at Chalkers Corner. In an email sent on 21 November 2018, the Applicant provided a response to Part (a). The response re-iterated that with:
- g) No development the road traffic noise levels at Chalkers Corner, Lower Richmond Road and Clifford Avenue will increase due to increase in traffic volume from the existing prevailing conditions. Under this scenario no mitigation would be provided to reduce the noise exposure of residents; or
 - h) With development mitigation would be provided that would reduce exposure of residents to road traffic noise when compared to the No Development scenario. At LRR and Clifford Avenue beyond the solid wall the predicted increase in road traffic noise, when comparison is made between the No Development Scenario v Development Scenario, is acoustically regarded as insignificant and imperceptible.
- 14.8 The response, dated 21 November 2018, concluded that the identified effects due to the proposed development, which provides inherent mitigation through provision of a 2m solid wall, should be acceptable.
- 14.9 **Planning Assessment:** The consultation with LBRuT in terms of noise did not lead to any amendments to the submitted scheme. It is therefore considered that these discussions do not affect the planning assessment previously provided within the

February 2018 Statement.

Odours

- 14.10 In comments dated 22 May 2018, and in order to control odour emission, LBRuT's Environmental Health Officer ("EHO") suggested a condition be applied to any planning permission for the scheme requiring full details of all odour control systems for all food and drink establishments.
- 14.11 The Applicant held a meeting with LBRuT's EHO on 15 June 2018 and issued a clarification response on 8 June 2018. Section 2.2 of this response confirmed that the Applicant accepted the proposed condition.
- 14.12 **Planning Assessment:** The consultation with LBRuT's EHO in terms of odour did not result in any amendments to the submitted scheme. LBRuT's EHO does not object to the scheme in terms of odour. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

Dust

- 14.13 In comments dated 22 May 2018, and in order to dust emission, LBRuT's EHO proposed a condition requiring the submission and approval of a Construction Dust Management Strategy.
- 14.14 The Applicant held a meeting with LBRuT's EHO on 15 June 2018 and issued a clarification response on 8 June 2018. Section 2.3 of this response confirmed that the Applicant accepted the proposed condition.
- 14.15 **Planning Assessment:** The consultation with LBRuT's EHO in terms of dust did not result in any amendments to the submitted scheme. LBRuT's EHO does not object to the scheme in terms of dust. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

Air Quality

- 14.16 Comments in respect of air quality were issued by LBRuT on 24 May 2018 (dated 22 May 2018) as part of the wider Environmental Assessment Review (Noise, Vibration, Air Quality, Dust and Odour). The comments related to the submitted air quality assessment prepared by Waterman and submitted as part of the ES.
- 14.17 In summary, the LBRuT air quality officer's considered that Waterman's report provided a good assessment of air quality for the area. The main limitations were considered to be:
- a) Lack of acceptable mitigation for existing receptors where adverse impacts are predicted;
 - b) Lack of air quality perspective on highways improvements at Chalkers Corner – a GLA junction in a GLA Air Quality Focus Area; and
 - c) High dependency placed on data from 3 diffusion tubes, not well sited for purposes used which even best methodology may result in uncertainties.
- 14.18 A note was issued to LBRuT on 8 June 2018 responding to the matters raised in the LBRuT's initial comments.
- 14.19 A meeting was held on 15 June 2018 with LBRuT EHOs, the case officer and the Applicant's project team, including Waterman. In advance of the meeting, Waterman provided LBRuT with a detailed response to the comments raised by LBRuT. The purpose of the meeting was to discuss LBRuT's comments and Waterman's responses.
- 14.20 At the meeting, a number of queries were raised by the air quality officer in respect of the modelling undertaken for the air quality assessment. Waterman prepared a further technical note addressing these comments which was issued to LBRuT on 25 June 2018. This note considered the additional modelling data provided by LBRuT. Initial comments on this note from the air quality officer were issued to the Applicant on 2 July 2018.
- 14.21 A further meeting was arranged for 24 July 2018 and attended by the air quality

officer, the case officer and the Applicant's project team, including Waterman. In advance of the meeting, Watermans provided LBRuT with an updated technical note which included details of the effectiveness of a green screen, based on LBRuT's new air quality monitoring data. A note addressing the 2 July 2018 LBRuT comments was also prepared. These additional documents were issued to LBRuT on 19 July 2018.

- 14.22 Since these discussions, Waterman has collected additional modelling data so as to better test the accuracy of their modelling. This additional modelling data has shown that the air quality model is considered to be performing well against monitoring results. Therefore the conclusions reached in the 2018 ES remain applicable and valid.
- 14.23 The additional monitoring data has been included within the ES Addendum (May 2019), submitted alongside these substitutions. It is noted that as the scheme amendments make no changes to traffic data, energy centre details or modelled receptor locations, the air quality effects and the conclusions as reported in the 2018 ES remain applicable and valid. The ES Addendum also includes further detail and guidance in respect of the effectiveness of green infrastructure in improving air quality, and commentary around the proposed amendments which include climber planting on the street frontage at Chalkers Corner, which will improve air quality conditions at Chertsey Court.
- 14.24 **Planning Assessment:** Additional modelling has been undertaken in line with LBRuT's requests. This additional modelling demonstrates that the results of Watermans's air quality assessment are robust. No scheme amendments are proposed which would affect the results of the air quality model. It should be noted that climber planting is proposed on the street frontage at Chalkers Corner which is considered to improve air quality conditions at Chertsey Court. The conclusions reached in the February 2018 Application that the impact on air quality is acceptable, and that the proposed works at Chalkers Corner will mitigate the air quality impacts as a result of the development still remain valid. The scheme is therefore considered to be acceptable against relevant air quality planning policies.

Trees

- 14.25 Comments from LBRuT's arboriculturalist were provided on 18 July 2018. The

arboriculturalist had concerns over the number of trees being retained, the soil depth for new planting, drainage and the density of planting (particularly in relation to Chalker's Corner). Additional details of tree protection during the construction period were also requested.

- 14.26 A response was provided by Gillespies on 29 August 2018 and a meeting was held on 28 November 2018. At the meeting it was reiterated that the space for replacement trees is more important than the quantity. Density of trees must be managed so as to ensure quality of planting and aftercare is maintained.
- 14.27 The originally submitted Arboricultural Impact Assessment states that up to 163 new trees would be planted. It was confirmed that this is an error, as over 400 new trees are proposed across the three applications sites including Chalker's Corner. Whilst it is considered regrettable to lose a small number of existing trees (73) across the site, this is considered inevitable and reasonable given the scale of development and the infrastructure required and the proposed replacement, sustainable tree populations. The landscape has been designed to accommodate trees in a range of circumstances contributing to the design and function of external spaces. The design team believe these are entirely appropriate and have detailed planting areas and selected species to suit each location. Further detail and planting layout plans and schedules will be provided at the detailed design stage.
- 14.28 With regards to soil depths, these were discussed in detail at the meeting. Tree pits would be 1.1m to 1.2m deep above the basement structural slab, wider than 2m and linked together in trenches where feasible.
- 14.29 In terms of Chalker's Corner, a high number and density of trees is required to provide an effective green barrier against traffic emissions in order to reduce air quality concentrations on the lee side (towards Chertsey Court) of the trees and proposed wall.
- 14.30 Additional clarity was provided on the proposed rain gardens. A nominal attenuation volume is held within the rain garden, which has been quantified in order to reduce the proposed runoff rate from the site. A rain garden cannot be used as rainwater harvesting as the water is attenuated within the soil aggregates, which is necessary to provide treatment of the runoff. Separate rainwater harvesting butts are proposed

throughout the development, which facilitate water reuse to water any surrounding planting.

- 14.31 A final response was provided by the LBRuT's arboriculturalist on 9 April 2019. Gillespies' Landscape Strategy Addendum as submitted within this submission responds to all comments received from LBRuT to date.
- 14.32 **Planning Assessment:** It is considered that tree removal follows Policy LP 16 of LBRuT's local plan as the majority of trees to be removed are within the Site boundary, screened from public view and/or are assessed to be of little amenity value as reflected by the BS5837:2012 'C' category grading of most of these trees. Tree pits for replacement trees have been designed in accordance with Policy LP 11. The tree protection methodology will be included in the detailed Construction Management Plan/Arboricultural Method Statements as required by planning conditions. The scheme is therefore considered to accord with planning policy. It is considered that the aforementioned discussions with LBRuT's arboriculturalist do not affect the planning assessment previously provided within the February 2018 Statement.

Ecology

- 14.33 Initial comments from LBRuT were received by the Applicant on 14 June 2019. Watermans responded to these comments on 19 September 2018 and a meeting was held with LBRuT ecology officer on 31 October 2018.
- 14.34 The principal points of concern related to the loss of mature trees and the replacement species.
- 14.35 Watermans reiterated at the meeting that the value of existing trees to wildlife has been assessment and found to be limited, whereas the proposed trees on Site will include semi-mature tree with a good mixture of species including many native species which will enhance their ecological value further. Trees will be provided extensively throughout the Site compared to the current situation where there is limited existing tree planting. A proportion of the new trees will be semi-mature at installation (a total of 32% in the detailed area of Application A, with the outline area to be confirmed at the detailed stage) to provide immediate physical and visual impact

and aid the rehabilitation of the site landscape and wildlife habitat.

- 14.36 Prior to the meeting, further ground-based and endoscope inspections of the river wall were undertaken and the results concluded that the absence of roosting bats can be assumed. At the meeting it was subsequently agreed that the Applicant will provide 10 bat boxes in the detailed part of the Application A site as mitigation for disruption to potential bat roosting locations.
- 14.37 **Planning Assessment:** The consultation with the LBRuT's ecology officer resulted in amendments to the number of bird and bat boxes required across the sites, however it is considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

Affordable housing / viability

- 14.38 Comments from LBRuT's viability advisors (GL Hearn, now Carter Jonas) on the submitted Financial Viability Assessment ("FVA") were issued to the Applicant on 26 April 2018.
- 14.39 A response was prepared by BNP Paribas (the Applicant's viability consultant) (dated 5 June 2018) and issued to LBRuT. On 26 June 2018, further documents were also issued to LBRuT to respond to GL Hearn's comments which included a response from G&T (cost consultants) and Savills (in respect of queries on land values and comparables). Further to the issue of this information, a meeting was held on 2 July 2018 with LBRuT, GL Hearn and the Applicant team, led by BNP Paribas.
- 14.40 Comments were issued from LBRuT's affordable housing officer on 3 July 2018. These were also passed to GL Hearn and it was agreed with the case officer that the affordable housing officer's comments would be discussed with the Applicant team as part of the wider viability discussions (as many of the points overlapped with GL Hearn's comments).
- 14.41 BNP Paribas then prepared a letter which was issued to LBRuT on 21 August 2018 (dated 15 August 2018) which further addressed comments raised by GL Hearn and LBRuT. In response, a letter was issued from GL Hearn dated 5 October 2018

providing further comment.

- 14.42 A meeting was held on 25 October 2018 with the GLA, the LBRuT planning officer and the Applicant's project team, which included BNP Paribas. During the meeting, the GLA viability officer requested additional inputs for the viability appraisal. A meeting was then held on 29 October 2018 with LBRuT planning and affordable housing officers, GL Hearn and the Applicant's project team, led by BNP Paribas. The GLA additional inputs were discussed and further information/testing was required. LBRuT and the GLA requested inputs were then formalised and emailed to the Applicant on 29 and 30 October 2018.
- 14.43 BNP Paribas then prepared a note responding to LBRuT and GLA queries on viability which was issued on 18 December 2018. A meeting was then held on 15 January 2019 with the GLA, LBRuT and the Applicant's project team, led by BNP Paribas. It was agreed that a 'wrap up' addendum document would be prepared by BNP Paribas.
- 14.44 This addendum document forms part of this formal addendum submission but has been issued to the GLA/LBRuT in advance of the formal submission in order to enable continued discussions. The purpose of the FVA addendum is summarised as follows:
- a) To provide an appraisal which takes account of the cumulative impact of changes requested by the GLA which were dealt with independently in the previous viability addendum;
 - b) To identify the value of the school and include this as income on the premise that the Council or another public body funds land acquisition for the provision of the school. It is important to note that our current understanding is that no public authority has so far committed to fund an acquisition of the school land;
 - c) To consider and reflect the impact of further optimisation work on scheme layouts (mainly comprising amendments to unit sizes) and associated updated cost plans; and
 - d) To update the appraisals to reflect other policy requirements – affordable workspace, updated CIL estimates and updated carbon offset payment estimates.

14.45 The additional analysis confirms the conclusion of the earlier December 2018 addendum submission, namely that the level of affordable housing in the current scheme design cannot viably increase.

14.46 **Planning assessment:** The viability assessment has been updated to take into account the additional information and testing as requested by the GLA/LBRuT as well as scheme updates, which are covered elsewhere within this Statement. The addendum submitted within this package of documents maintains the conclusion that the level of affordable housing in the current scheme cannot viably increase. This does not affect the previous planning assessment set out within the February 2018 Statement which concluded that if the FVA is accepted then in planning policy terms it is in accordance with the development plan.

Policy

14.47 LBRuT policy comments were issued to the Applicant on 12 February 2019. A draft response to all of the comments was issued to LBRuT on 19 March 2019 and discussed at a meeting with LBRuT on 20 March 2019. Following this meeting, some of the responses were updated. Following issue of the draft response, further comments in respect of the proposed Care Village were issued by LBRuT via email on 26 April 2019. The final policy response was issued to LBRuT on 3 May 2019.

14.48 A summary of the policy comments, the Applicant's response and subsequent scheme amendments / scheme clarification is set out as follows:

Application A (18/0547/FUL)		
Policy comments	Applicant response	Scheme amendments / clarified documents
Retail comments – further information should be provided and minor scheme amendments should be made	Further information provided and requested scheme amendments provided	Proposed retail maximum cap in flexible floorspace reduced to 2,000 sqm Updated plans provided removing flexible unit partitions Agreement to conditions for retail unit layouts and maximum size

		Updated High Street Zone Plan provided within Appendix A of the submitted Town Planning Statement (February 2018)
Employment comments – a higher minimum office floorspace should be sought within the flexible floor area, more information should be provided on employment density and flexible work space office provision	Further information and justification provided in line with response, including demonstrating where the affordable workspace could, in theory, be located	Proposed office minimum cap in flexible floorspace increased to 2,000 sqm Agreement to the following in the S106: <ul style="list-style-type: none"> • Trigger for delivery of affordable workspace; • Local Employment Agreement (for construction); Agreement to the removal of office to residential permitted development rights for the office elements of the scheme
Other community uses – the accessibility and usability of the water sports centre should be demonstrated, a minimum provision of community floorspace should be secured. At the meeting on 20 March 2019, it was also requested that the Maltings Building be secured for community use subject to demand	Further information provided in respect of the water sports centre (plans and information provided for clarity, not for formal submission)	Agreement of condition which requires the water sports centre (ground floor of block 9) to be secured as community use Agreement of potential condition/legal obligation for part of the Maltings Building community space to be used as Class D1 unless 1 year marketing evidence can demonstrate there is no demand
Housing – further justification for the unit sizes should be provided, summary of wheelchair units to be provided, justification for lack of amenity spaces for some units to be justified	Further information provided as requested in addition to scheme amendments which should address comments where possible	Revised unit sizes on the detailed elements following exercise for optimisation giving due consideration to all other constraints – results in 9 additional habitable rooms (loss of 4 units overall, loss of 40 sqm residential floorspace) as well as revised mix Amenity space provided for all units in block 2 Updated plans and area schedules

		issued within this submission to reflect the above
Care Village – justification for the assisted living being a C2 use class, justification for assisted living demand (request of omission)	Additional justification and explanation provided as requested including additional evidence for assisted living demand, details of the care accommodation	No scheme amendments but agreement to increasing the marketing period to 6 months for the assisted living units (to be marketed to those within the Borough) within the S106
Public health / CCG – health care impact – request to agree to S106 obligations in respect of care accommodation, request to agree to a financial contribution for healthcare, consideration of sheltered playspace, request for other legal agreement obligations and conditions, comments in respect of air quality improvements	Comment in respect of requested conditions and legal agreement obligations, resistance for financial contribution (as this has not been clearly justified), further justification for playspace provision and no agreement to sheltered playspace provision, information on waste strategy; further detail and explanation of air quality improvements and impacts	No scheme amendments but agreement to S106 obligations and/or conditions for the following: <ul style="list-style-type: none"> • 6 month marketing for assisted living units; • Estate Management Plan; • Affordable housing; • Affordable workspace; • Flexible uses; • Mitigation measures as set out in the ES (where necessary); • Travel Plan; • Community Use Agreement; • Works to towpath; • Local employment agreement (for construction).

Table 2: Application A LBRuT Policy Comments - Summary

Application B (18/0548/FUL)		
Policy comments	Applicant response	Scheme amendments / clarified documents
Sports pitch with floodlighting, external MUGA and playspace – clarification sought over pitch size, clarification requested over	Clarification provided in respect of sports pitch and spectator space design, hours amended where team considered appropriate	Updated SLC briefing paper (included within submitted OOLTI Assessment) to reflect updated hours in calculations and sports pitch dimensions (see assessment of this amendment under ‘Sport England’ section of this Statement

sports use hours, proposed adjustment to Community Use hours, details of engagement with Barnes Eagles and Community Use Agreement, clarification sought on materials of spectator space and boundary treatments, queries in respect of cycle parking and school design	(reduction in finish time to 9pm), update provided in respect of Barnes Eagles and Community Use Agreement, further information provided in respect of school design and habitat area, updated plans to show cycle parking	(Chapter 7) Updated landscape drawings (refs. P10736-00-001-132 Rev D05 and P10736-00-001-133 Rev D05) and landscape DAS to take account of changes to materials, clarifications in respect of sports pitch dimensions and updated cycle parking numbers has been submitted
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Table 3: Application B LBRuT Policy Comments - Summary

Other Matters		
Policy comments	Applicant response	Scheme amendments / clarified documents
Queries in respect of cycle hub, car club and communal gardens	Information provided as requested	None

Table 4: Other Matters Policy Comments - Summary

14.49 **Planning assessment:** The only changes set out above which require further planning assessment are the amendments to the office/retail provision within the flexible use floor area and the amendments to the residential unit size/mix and number. These changes are considered below.

Retail / Office Policy Considerations

14.50 The agreed approach to retail / office within the flexible use floor area (i.e. maximum of 2,000 sqm Class A1 retail and minimum of 2,000 sqm Class B1 office) should not alter the planning assessment conclusions reached in the February 2018 Statement. The February 2018 Statement and other submission documents assumed a maximum of 2,500 sqm Class A1 retail and 2,000 sqm Class B1 office. As the maximum caps have not increased from the February 2018 submission (only the A1 cap has been reduced), a 'worst-case' assessment has therefore been conducted for the February

2018 submission. It is therefore considered that the minor amendment to the flexible uses would not affect the conclusions previously reached in the February 2018 submission documents.

- 14.51 Whilst the planning assessment for this element remains the same, the Community Infrastructure Levy (“CIL”) estimates will change as a result of the amendment. Previously, estimates were provided on the basis of a ‘worst-case’, i.e. that a maximum of 2,500 sqm was provided as Class A1 retail (as in this location LBRuT only charge on Class A1 retail). Now that this has been reduced to a maximum of 2,000 sqm, the CIL estimates have accordingly been updated.

Residential Policy Considerations

- 14.52 In respect of the residential planning assessment, the following amendments are proposed to the residential accommodation within Development Area 1 (to the east of Ship Lane, applied for in detail):

- a) Increase in 9 habitable rooms;
- b) Decrease in 4 residential units;
- c) Provision of amenity space for all units in block 2;
- d) Change in mix; and
- e) Decrease of 40 sqm of residential floor area.

Density

- 14.53 The proposed amendments would not affect overall residential floorspace proposed. As set out within the February 2018 Statement, it is considered that the proposed density should be considered within the context of the Site, its surroundings and giving consideration to townscape, transport and other design and technical considerations. The February 2018 Statement assesses each of these criteria and concludes that the proposed density is acceptable.

- 14.54 Notwithstanding this, the February 2018 Statement sets out density as per the Mayor’s London Plan and using guidance set out within the Mayor’s Housing

Supplementary Planning Guidance (“SPG”). The density calculations have been run again following the scheme amendments and the updated density tables are set out below at Tables 5 and 6.

- 14.55 Comparing these density figures with those submitted within the February 2018 Statement, it is clear that the amendments to the proposed density levels are de minimis. Specifically, where the assisted living blocks are excluded from the density calculations (Table 5), the hab rooms per hectare increases from 401 to 402. There are no other changes to the outputs in the calculation. Where the assisted living blocks are included from the density calculations (Table 6), the units per hectare reduces from 139 to 138. It is therefore considered that the minor amendment to the residential component of the scheme would not affect the conclusions previously reached in the February 2018 submission documents.

Blocks 13, 16, 17 as assisted living (i.e. excluded in density calculations)					
Number of Residential Units	663				
Average Habitable Rooms per Unit	3.38				
PTAL	2				
Setting	Urban				
Appropriate density range	200-450 hab rooms per hectare				
	55-145 units per hectare				
Site Area (ha)	Ha	Units Per Hectare	Within Density Range for Units?	Hab Rooms Per Hectare	Within Density Range for Hab Rooms?
Net Site Area	5.59	119	Yes	402	Yes

Table 5: Updated Density Matrix Calculations - Assisted Living Excluded

Blocks 13, 16, 17 as residential (i.e. included in density calculations)					
Number of Residential Units	813				
Average Habitable Rooms per Unit	3.32				
PTAL	2				
Setting	Urban				
Appropriate density range	200-450 hab rooms per hectare				
	55-145 units per hectare				
Site Area (ha)	Ha	Units Per Hectare	Within Density Range for Units?	Hab Rooms Per Hectare	Within Density Range for Hab Rooms?
Net Site Area	5.88	138	Yes	459	No

Table 6: Updated Density Matrix Calculations - Assisted Living Included

Unit Mix

14.56 Following LBRuT's comments in respect of unit sizes, the scheme was reviewed and it was considered that an additional 13 habitable rooms could be delivered at Development Area 1. Due to the changes to the amenity space provision in Block 2, this resulted in a further decrease in habitable rooms, resulting overall in an increase of 9 habitable rooms in total. This exercise also altered the proposed unit mix.

14.57 The revised unit mix is set out below at Table 7:

Unit Type	1-bed	2-bed (family)*	3-bed	4-bed	Total
Number	50	244	130	15	439
% of total	11%	56%	30%	3%	100%
Family sized accommodation (2 bed family, 3 bed and 4 bed units) as a % of total proposed					89%

Table 7: Updated Proposed Unit Mix for Development Area 1 (East of Ship Lane - Detailed Application)

* 2 bed 3 or 4 person units can be classified as 'family' sized accommodation, as per LBRuT's DMP glossary and the adopted Local Plan glossary

14.58 The changes to the unit mix are summarised as follows:

- a) The number of 1 bed units has decreased from 65 units to 50 units (15% to 11%);
- b) The number of 2 bed (family) units has increased from 232 units to 244 units (52% to 56%);
- c) The number of 3 bed units has decreased from 138 units to 130 units (31% to 30%); and
- d) The number of 4 bed units has increased from 8 units to 15 units (2% to 3%).

14.59 These changes mean that the proportion of family sized accommodation has increased from 85% to 89%.

14.60 **Planning Assessment:** The proposed changes to the unit mix would still deliver a mixed scheme with a significant amount of family sized housing (89%) alongside smaller accommodation (11%). This mix remains acceptable in line with the Site's location within an Area of Mixed Use.

Amenity Space

14.61 Block 2 has been reconfigured so that all units will provide a minimum of 5sqm

amenity space. This is in line with LBRuT comments.

- 14.62 **Planning Assessment:** It is considered that the amendment to provide amenity space for Block 2 is in line with planning policy.

LBRuT Policy comments – Summary

- 14.63 **Planning Assessment:** A number of scheme amendments have been made in response to the policy comments received by LBRuT. These amendments have been considered above against relevant planning policies and within the context of the assessment set out within the February 2018 Statement. It is considered that these amendments are acceptable in planning policy terms.

Design and conservation

- 14.64 LBRuT design code comments were issued to the Applicant on 21 September 2018. The comments were minor in nature and the revised Design Codes were issued to LBRuT on 25 March 2019.
- 14.65 With regards to detailed design and heritage, LBRuT issued their comments to the Applicant on 6 February 2019. In summary, LBRuT had comments on the following areas of the scheme:
- a) Block 1 – the freestanding nature of the cinema building, the treatment of the cinema elevations and landscaping/entrance;
 - b) Block 2 – refinement of turrets and gables, width of commercial units;
 - c) Block 3 – ground floor layout and frontage;
 - d) Block 4 (Maltings) – fenestration and removal of metal balustrades;
 - e) Block 5 (Bottling Plant) – level of demolition, retention of cast iron columns, roof material;
 - f) Block 6 (Hotel) – level of demolition, relationship between two and three storey elements and access to Bottling Square;

- g) Block 7 – turrets;
- h) Block 8 - roof design;
- i) Block 9 – roof design;
- j) Block 10 – active frontages;
- k) Block 11 – active frontages;
- l) Block 12 – Roof design;
- m) Blocks 20 and 21 – relationship with properties to the rear; and
- n) Proximity and aspect of buildings.

14.66 A meeting to discuss all the comments took place on 12 March 2019 with LBRuT planning, design and conservation officers. The Applicant provided a written response with clarifications and amendments required as a result of the discussions on 25 March 2019. This written response has been updated and submitted herewith as the Design and Access Statement Addendum.

14.67 In terms of conservation, Watermans have assessed the proposed changes and consider that they result in some improvements, but no change to the significance of effects of the proposed development.

14.68 **Planning Assessment:** The consultation with the LBRuT's design and conservation officers resulted in some minor redesign of some of the above blocks. The level of redesign is considered minor in the overall scale of the development and therefore does not affect the planning assessment previously provided within the February 2018 Statement.

Transport

14.69 This section responds only to matters specifically raised by the LBRuT's Transport Officer. Please refer to the comments provided in Section 7 of this Planning Statement Addendum for an overview of the consultation held with TfL.

14.70 Formal comments from the LBRuT's Transport Officer were received on 6 February

2019. The comments covered matters including: strategic traffic modelling, trip generation, highways impacts, the Sheen Lane level crossing, public transport (bus and rail), car parking, walking and cycling provision, travel plans and construction management.

14.71 The Applicant provided a formal response to the comments on 22 March 2019. The response clarified the appropriateness of the strategic traffic modelling undertaken for the scheme. The response also confirmed: the discussions with Network Rail regarding the package of measures at Sheen Lane's level crossing, that additional demand for trains could be accommodated within the existing station infrastructure and the existing and future service capacity, the management of car parking spaces (both private and affordable residential)

14.72 A meeting was held on 16 April 2019 to discuss the Applicant's response, dated 22 March 2019. At the meeting it was agreed that the applicant would provide the following additional information for clarification purposes:

- a) Executive Summary of the modelling carried out;
- b) existing and proposed plans showing: publicly maintained and adoptable roads, private roads, stopping up orders and direction of flow; and
- c) Proposed plans relating to bus: routes, manoeuvring tracking, direction of flow, licencing requirements, drop off and pick up areas and reserved areas for queuing buses.

14.73 **Planning Assessment:** The consultation with the LBRuT's Transport Officer in did not result in any amendments to the submitted scheme. The LBRuT's Transport Officer does not object to the scheme. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

Community Infrastructure Levy / Section 106 Heads of Terms

14.74 Draft CIL estimates and working spreadsheets were issued to LBRuT on 24 January 2018 (ahead of formal submission of the Applications). Following the introduction of Mayoral CIL 2 on 1 April 2019 and discussions in respect of retail floorspace, these

were updated and re-issued on 9 April 2019. A meeting was held on Site on 1 May 2019 to discuss the CIL estimates and approach, and the Section 106 draft Heads of Terms.

14.75 **Planning assessment:** The scheme will deliver a substantial CIL payment, as envisaged in the Applications. The Section 106 is in the process of being discussed with LBRuT but it is anticipated that the obligations will largely reflect the draft Heads of Terms as set out within the February 2018 Statement, as well as incorporating relevant obligations following further liaison with consultees. It is therefore considered that the scheme is acceptable in planning policy in respect of CIL and Section 106 obligations.

15 Royal Mail

- 15.1 On 25 October 2018 an objection from Royal Mail was issued (via LBRuT). The RM objected to the Applications on two grounds:
- a) The noise assessment did not assess noise from the post office site in isolation and;
 - b) Regarding the perceived high level of sound insulation that would be required for the proposed units on Mortlake High Street.
- 15.2 On 21 November 2018, the Applicant responded to the objection via email to the LBRuT. The response set out that the proposed uses at the site had been thoroughly assessed for appropriateness in terms of noise within the submitted Noise Assessment. The submitted Noise Assessment accounted for noise created from delivery vehicles and ventilation/sound insulation requirements for the Mortlake High Street façade. The response reiterated that existing residential amenity would be preserved from any noise created by vehicle movements as they would be screened by the Royal Mail office such that it will not be an issue when compared to the existing local road traffic noise on Mortlake High Street.
- 15.3 **Planning Assessment:** The consultation with Royal Mail did not result in any amendments to the submitted scheme. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

16 The Port of London Authority

- 16.1 The PLA provided written comments to LBRuT on the Applications on 4 June 2018. The comments followed on from pre-application discussions and the PLA raised no in principle objection to the scheme. Clarification and further explanation was sought in respect of the interaction with the river (and use of the water sports centre), the towpath and use of the river during construction.
- 16.2 A draft response and associated additional plans were prepared and issued on 6 September 2018. Further to the issue of this response, a meeting was arranged with the PLA, LBRuT and the Applicant's project team for 31 January 2019 to discuss the response and any outstanding matters of clarification.
- 16.3 Following this meeting, a second draft response was issued on 19 March 2019. This response sought to provide further explanation for the use of the water sports centre, use of the river during construction and an update on discussions with the EA. A final response from the PLA is awaited.
- 16.4 **Planning assessment:** The consultation with the PLA did not result in any amendments to the submitted scheme. The PLA do also not object to the scheme. It is therefore considered that these discussions do not affect the planning assessment previously provided within the February 2018 Statement.

17 Summary and Conclusions

- 17.1 Reselton Properties have submitted a package of scheme amendments and revised documents for the Stag Brewery Applications following extensive consultation with stakeholders.
- 17.2 This submission includes substituted documents and addendum documents which include scheme amendments and further information / clarification on points where necessary.
- 17.3 This Statement has considered the proposed amendments against the planning assessment contained within the February 2018 Town Planning Statement. It is concluded that the proposed development remains in accordance with relevant strategic and local policy objectives, and specific policy criteria.
- 17.4 The proposals would continue to achieve the stated aims, objectives and aspirations of planning policy, including the provisions of the adopted development plan. The proposals are therefore acceptable in planning policy terms and there are no other material planning considerations that should prevent the scheme from being granted planning permission.

Appendix A – Consultation Tracker

FORMER STAG BREWERY
APPLICATIONS CONSULTATION RESPONSES TRACKER
03-May-19



GERALDEVE

APPLICATIONS A, B and C
Refs. 18/0547/FUL; 18/0548/FUL; 18/0549/FUL

DEADLINE DATES							
Consultee	Date and format of consultee response issued	Date and Format of Applicant response	Date and format of latest consultee response	Date and Format of latest Applicant response	Scheme amendments summary	Amended Documents	Outcome of consultation
Statutory Consultees							
Environment Agency	Application A comments, received via email on 11 May 2018. Second response: 14 June 2018. Further Application A comments, dated 18 September 2018, received via email on 18 September 2018.	Written response, dated 20 June 2018, issued to LBRuT via email on 27 June 2018. Written response, dated 30 October 2018, issued to LBRuT via email on 30 October 2018.	Application B final response dated: 21 August 2018 issued via email on 21 August 2018. Application A final response issued via email dated 18 April 2019.	Meeting held on site with EA on 03 December 2018. Final written response, dated 11 January 2019, sent to LBRuT via email on 11 January 2019.	Boathouse and Building 9 design amended	Y	Awaiting any final response from EA
Network Rail	First meeting held: 16 May 2018 Second meeting held: 12 July 2018	Note circulated on 30 October 2018. Conference call: 13 December 2018.	Further comments received via email on 19 December 2018	Final written response, dated 11 January 2019, issued to LBRuT via email on 11 January 2019.	No amendments required	N	LBRuT to discuss NR works with Applicant
Sport England	Comments received via email to LBRuT dated 30 April 2018.	To be issued	To be issued	To be issued	Operating hours and luminance of floodlights for proposed MUGA amended (following LBRuT comments)	Y	Ongoing
Transport for London	Comments in letter, dated 21 May 2018, received via email from LBRuT on 21 May 2018. Position contained in Mayor's Stage 1 letter, dated 30 June 2018. Further comments received via email on 20 August 2018 following 09 August 2018 meeting.	Response letter, dated 13 July 2018 issued via email to LBRuT on 13 July 2018. Meeting held: 09 August 2018. Further clarification response issued via email on 19 September 2018.	Updated position letter, dated 09 November, received on 09 November 2018.	n/a	Cycle parking numbers updated	Y	No further liaison required
Thames Water	Comments received via email on 30 April 2018. Written response to capacity query received, dated 13 May 2018. Written response to Applications A, B and C, dated 15 May 2018.	Written responses, dated 25 September 2018, issued to TW via LBRuT: 25 September 2018	Condition suggested via email, dated 6 February 2019.	Email response issued directly to TW on 19 February 2019 (LBRuT cc'd).	No amendments required	N	TW agree to condition via email on 6 March 2019. No further actions for either party
Natural England	Comments, dated 19 April 2018, received via email from LBRuT	Written responses issued to NE via LBRuT: 14 August 2018 and 21 August 2018, dated 27 June 2018 and 21 August 2018 respectively.	n/a	n/a	No amendments required	N	Awaiting any final response from Natural England
GLAAS	Letter, dated 17 April 2018, received via email on 19 April 2018	Response issued via email to LBRuT on 31 July 2018.	n/a	n/a	No amendments required	N	Team agree with proposed conditions. No further actions for either party.
Historic England	Written comments, dated 17 April 2018, received via email from LBRuT	No response required	n/a	n/a	No amendments required	N	Y
GLA (Stage 1)	Stage 1 Letter received 30 July 2018.	Response letter, dated 26 September 2018, issued: 26 September 2018	n/a	n/a	No amendments required	Y	Ongoing discussions
GLA Flooding	First response received via email on 18 June 2018. Stage 1 Letter, dated 30 July 2018, received 30 July 2018. Third response received over email, dated 25 October 2018.	First response issued on 24 August 2018 via email. Written response, dated 10 September 2018, issued on 26 September 2018 via email. Written response, dated 1 November 2018, sent via email on 19 November 2018.	Final response: 28 November 2018	Briefing Note, dated 8 January 2019, issued to GLA via email on 8 January 2019	Drainage Strategy updated	Y	GLA confirmed satisfaction to the Briefing Note on 8 Feb 2019
GLA Energy	Energy Memo received via email on 2 July 2018. Stage 1 Letter received on 30 July 2018. Written response received and dated 25 October 2018 via email. Further written response received and dated 5 December 2018 via email.	First written response issued: 31 August 2018 Second written memo response issued: 10 January 2019 Meeting held: 15 January 2019	Response following meeting received via email dated 24 January 2019. Further response received as an email on 18 February 2019 Comments received as an email on 3 April 2019	Follow-up ES Addendum issued: 01 February 2019 via email dated 18 January 2019. Further email comments issued: 25 March 2019 via email. Conference call held with GLA energy officer on 1 May 2019.	No amendments required	Y	GE issued HL draft ES addendum 1 Feb 2019 to GLA. Ongoing discussions with HL/GLA
GLA Air Quality	First Written Response (not dated) received 18 June 2018 via email. Second written response received via email, dated 24 August 2018	Response, dated 6 September 2018, issued on 26 September 2018	-	-	No amendments required	N	GE seeking confirmation that response provided is satisfactory. GE chased again on 19 March 2019
GLA (initial viability comments)	Initial comments received via email dated 28 February 2018. Further information/testing requirements emailed to Applicant on 30 October 2018 (LBRuT 29 October 2018)	Written response dated 2 March 2018, issued to GLA via email. Meeting held 25 October 2018 (with LBRuT) Note addressing inputs required issued 18 December 2018 Meeting held 15 January 2019 (with LBRuT)	-	Addendum FVA, dated 25 March 2019, issued to GLA via email on 28 March 2019 to both GLA and LBRuT.	No amendments required	Y	Ongoing discussions. Meeting arranged with GLA/LBRuT and Applicant 7 May 2019
London Borough of Richmond Upon Thames							
Environmental Health							
Noise and vibration		Written response, dated June 2018, issued to LBRuT via email on 8 June 2018. Meeting held: 15 June 2018. Note, dated 30 August 2018, issued via email on 30 August 2018.	Final comments issued via email on 25 October 2018.	Final response issued to LBRuT as an email on 21 November 2018.	No amendments required	N	Awaiting confirmation from LBRuT that all comments have been sufficiently addressed/that further queries need to be resolved.
Odours	First written response issued via email on 24 May 2018 (dated 22 May 2018)	Written response, dated June 2018, issued to LBRuT via email on 8 June 2018. Meeting held: 15 June 2018	-	-	No amendments required	N	Awaiting confirmation that response is acceptable.
Air Quality		Written response, dated June 2018, issued to LBRuT via email on 8 June 2018. Meeting held: 15 June 2018 Full technical note, dated June 2018, issued to LBRuT via email on 25 June 2018.	Comments on full technical note issued: 2 July 2018	Further response issued: 19 July 2018 Further meeting held: 24 July 2018	Additional planting introduced at Chalkers Corner Additional monitoring undertaken	Y	LBRuT to review additional information included in substitution documents
LBRuT Trees	First written response (not dated) issued via email on 18 July 2018	Written comments, dated August 2018, issued via email on 29 August 2018. Meeting held: 28 November 2018. Response, dated January 2019, issued to LBRuT via email on 25 January 2019.	Final response issued via email on 9 April 2019	Final response to be incorporated into substitution documents submitted to LBRuT on 3 May 2019.	No amendments required	Y	LBRuT to review additional information included in substitution documents

DEADLINE DATES							
Consultee	Date and format of consultee response issued	Date and Format of Applicant response	Date and format of latest consultee response	Date and Format of latest Applicant response	Scheme amendments summary	Amended Documents	Outcome of consultation
LBRuT Ecology	First written response (not dated) issued via email on 14 June 2018 Second response issued via email on 19 September 2018	Written comments, dated August 2018, issued to LBRuT via email on 23 August 2018 Further response, dated October 2018, issued to LBRuT on 31 October 2018 Meeting held: 31 October 2018 Additional response, dated January 2019, issued to LBRuT on 25 January 2019.	Final response issued via email on 9 April 2019	Final response to be incorporated into substitution documents submitted to LBRuT on 3 May 2019.	No - response required additional clarifications. Additional bat survey was run.	Y	LBRuT to review additional information included in substitution documents
LBRuT Affordable Housing and Viability	First comments on FVA issued 26 April 2018. Further comments received via email on 03 July 2018. Further comments issued via letter dated 5 October 2018. Further information/testing requirements emailed to Applicant on 29 October 2018 (GLA 30 October 2018)	Response issued to LBRuT (dated 5 June 2018 and 26 June 2018) Meeting held on 2 July 2018 Further response issued to LBRuT on 21 August 2018 (dated 15 August 2018) Meeting held 25 October 2018 (with GLA) Meeting held 29 October 2018 Note addressing inputs required issued 18 December 2018 Meeting held 15 January 2019 (with GLA)	n/a	Addendum FVA, dated 25 March 2019, issued to GLA via email on 28 March 2019 to both GLA and LBRuT.	No amendments required	Y	Ongoing discussions. Meeting arranged with GLA/LBRuT and Applicant 7 May 2019
LBRuT Planning (including CCG input)	Written response (not dated) received via email from LBRuT, dated 12 February 2019 Further comments issued 25 April 2019	First draft response issued to LBRuT via email on 19 March 2019 Meeting held on 20 March 2019	n/a	Final response issued to LBRuT on 3 May 2019 (to 12 February 2019 comments) Response to 25 April 2019 comments due to be issued shortly	Y - max/min. flexible land use quantum revised, unit sizes and amenity space amended (change to unit nos, mix) Revised drawings and schedules issued in substitution	Y	LBRuT to review final response and additional information included in substitution documents
LBRuT Design	Design code comments(not dated) issued via email on 21 September 2018 First urban design comments (not dated) received via email on 06 February 2019	Meeting held: 12 March 2019 Revised design codes, dated January 2019, issued to LBRuT on 25 March 2019, via email.	n/a	Revised Design codes, dated January 2019, and Design Addendum, dated 12 February 2019, issued to LBRuT via email on 25 March 2019 .	Yes. Revised drawings and DAS addendum required for substitution.	Y	LBRuT to review final response and additional information included in substitution documents
LBRuT Conservation	First comments (not dated) issued via email on 06 February 2019.	Heritage wayfinding note, dated February 2019, issued to LBRuT: 28 February 2019 Meeting held: 06 March 2019.	n/a	Final response to be incorporated into substitution documents submitted to LBRuT on 3 May 2019.	Y - revised drawings.	Y	Design amendments made in line with comments.
LBRuT Transport	First written comments (not dated) issued via email on 06 February 2019	Written summary response, dated 22 March 2019, issued via email to LBRuT on 22 March 2019 Meeting held 16 April 2019	n/a	Final response to be incorporated into substitution documents submitted to LBRuT on 3 May 2019.	Y - increase cycle parking	Y	LBRuT to review final response and additional information included in substitution documents
LBRuT Energy/Sustainability	See GLA Energy						
LBRuT CIL	Draft CIL estimates issued 24 January 2018 and 9 April 2019	Meeting held on 1 May 2019	n/a	N	No amendments required	N	No further liaison required at this stage - further information to be provided in due course
3rd Party Responses							
Royal Mail	Comments received via email from LBRuT on 25 October 2018	Response issued via email to LBRuT on 20 November 2018	n/a	n/a	No amendments required	N	Awaiting confirmation that response provided was satisfactory
Port of London Authority	Written response (not dated) received via email on 04 June 2018	Written response, dated 21 August 2018, issued via email to LBRuT on 6 September 2018 Meeting held on 31 January 2019	n/a	Final written response dated 18 March 2019 issued to via email to LBRuT on 19 March 2019	No amendments required	N	Awaiting confirmation that response satisfactorily responds to comments