

29 October 2020

Ashley Russell
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GREATER LONDON AUTHORITY
City Hall
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Dear Ashley Russell,

RE: Consultation on revised documents for planning applications relating to The Stag Brewery, Lower Richmond Road, Mortlake, London, SW14 7ET; and Chalkers Corner Junction at the Junction of Lower Richmond Road, South Circular and Clifford Avenue, Richmond; in the London Borough of Richmond upon Thames.

GLA ref: GLA 4172, 4172a & 4172b

LPA ref: 18/0547/FUL; 18/0458/FUL and 18/0549/FUL

1.0 Introduction

1.1 Thank you for the email consultation notification, dated 19th August 2020, regarding the abovementioned planning applications.

1.2 To summarise the history, these applications were submitted in 2018, and following extensive negotiations and amendments, were referred to the London Borough of Richmond's Planning Committee in January 2020. The Committee resolved to:

- Approve application A (18/0547/FUL) for the hybrid redevelopment proposal for the former Stag Brewery site.
- Approve application B (18/0438/FUL) for the new secondary school with sixth form.
- Refuse application C (18/0549/FUL) for the reconfiguration of the Chalkers Corner traffic junction, to include the existing public highway and land within Chertsey Court on the following grounds:

With the mitigation measures secured in applications 18/0547/FUL and 18/0548/FUL for the Stag Brewery redevelopment, such as but not limited to Travel Plans (and associated bonds) and contributions towards highway improvements, and the proposed programme of implementation for the aforementioned applications, it is deemed the adverse impacts to the highway network caused by the redevelopment can be adequately mitigated without the need for the development hereby refused. The development is thereby an inappropriate and unnecessary form of development where any benefits that the scheme may deliver is outweighed by harm:

- a) *Trees: The development, by reason of the proposed siting of the highway works; the subsequent loss of highly prominent trees of townscape and amenity value, and the inadequacy of the proposed planting and CAVAT contribution that are not deemed to sufficiently mitigate the harm caused by the loss of the existing trees, would represent an unacceptable form of development, that would harm the visual amenities of the streetscene, surrounding residential properties and area in general, contrary to policy, in particular policies LP 1, LP 8 and LP 16 of the Local Plan; policy 7.21 of the London Plan and the National Planning Policy Framework.*
- b) *Other Open Land of Townscape Importance and Unneighbourly: The development, by reason of the encroachment of the public highway and footway towards and within Chertsey Court and the consequential loss of Other Open Land of Townscape Importance, which is of value by reason of its presence, green nature and openness, would represent an unacceptable and unneighbourly form of development that would harm the green openness and character of both the grounds within Chertsey Court and the kerb side adjacent, to the detriment of the visual Official amenities of surrounding residents, streetscene and area in general. The development would thereby be contrary to policies, in particular LP 1, LP 8 and LP 14 of the Local Plan and the National Planning Policy Framework.*
- c) *Air Quality: The development, by reason of, its location within an Air Quality Management Area and Air Quality Focus Area; the proposed alterations and increase to the size of the road network; the subsequent reduction in width of the public realm; and the absence of acceptable mitigation to protect the users of the pedestrian network; would result in a poor walking environment and increase the risk of exposure to poor air quality in an area that already suffers from high levels of pollution. The development is thereby contrary to policies, in particular policies LP 10, LP 30 and LP 44 of the Local Plan, policy 7.14 of the London Plan and the National Planning Policy Framework, all of which aim to improve local environmental conditions such as air quality, minimise increased exposure to existing poor air quality, and enhance existing walking networks and people's health and wellbeing.*

1.3 The schemes heard by the Council's Planning Committee are referred to as the January scheme(s) in this response. The Planning Committee Report, Addendum, Minutes and Amended Heads of Terms to reflect the above decisions can be viewed within Appendix 1.

1.4 On 4 May 2020, the Deputy Mayor for Planning, Regeneration and Skills, acting under delegation from the Mayor of London issued a direction to the Council that he will act as the Local Planning Authority for the purposes of determining the Applications (under article 7 of the Town and Country Planning (Mayor of London) Order 2008 and the powers conferred by Section 2A of the Town and Country Planning Act 1990 (as amended)). The Mayor's reasons for issuing this direction were:

- a) The development would deliver only 12-17% affordable housing, representing a sub-optimal scheme and significantly falling short of the expected provision, which would exacerbate the Council's recent underperformance in delivering affordable housing and this warrants further consideration.

- b) The Council's decision to refuse Application C risks the highways impacts of the proposed development not being adequately mitigated, without these matters being further considered.
- c) There remain outstanding transport issues, in particular those regarding impacts to the bus journey times.
- d) Application B, comprising the new secondary school and sixth form, comprises part of the wider redevelopment scheme and must therefore also be considered in conjunction with Applications A and C.

1.5 Subsequent to the Mayor's direction, on 17 July 2020 the applicant submitted revisions to the Greater London Authority (GLA), referred to as the Revised scheme, including:

- Increase in residential unit provision from up to 813 units (including 150 flexible assisted living and/or residential units) to up to 1,250 units.
- Increase in affordable housing provision from up to 17% to up to 30%.
- Increase in height of some buildings, of up to three storeys.
- Changes to the layout of Buildings 18 and 19.
- Conversion of Block 20 from a row of terrace housing to a pair of four storey buildings.
- Reduction in the size of the western basement, resulting in an overall reduction in car parking spaces of 186 spaces, and introduction of an additional basement storey beneath Building 1 (the Cinema).
- Other amendments involving changes to internal layouts, relocation and change to the quantum and mix of land uses across the Site.
- Removal of the nursing home and assisted living proposals from Development Area 2.
- Landscaping amendments, including canopy removal of four trees on the north-west corner of the Site.
- Updated supporting documents for all Applications.

The applicant's submission includes further environmental information under Regulation 25 of the EIA Regulations in relation to the Environmental Statement which accompanied the Applications.

1.6 Further to discussions between the applicants and the GLA, a number of minor amendments and updates to documents were made in September 2020, and subject to a further period of consultation:

1. Revised Design Code.
2. Revised drawings including amendments to the design of Block 01, resulting in minor amendments to the design of the roof which reduces the height of the building by 2m. No amendments to other elements of the building, storey numbers or proposed floorspace.
3. Revised Design & Access Statement addendum.
4. Revised Environmental Statement Addendum, including additional letter with Annex to set out the assessment of revised Block 01 design (alongside relevant revised viewpoints).
5. Energy Strategy Addendum.
6. Circular Economy Statement.
7. Whole Life Carbon Assessment.
8. Further information in the form of drawings and Environmental Statement sections.

1.7 This letter forms the Council's formal response to the Revised scheme.

Application A: Redevelopment of the former Stag Brewery site (LBR ref: 18/0547/FUL):

2.0 Land Use

2.1 Commercial floorspace: Table 1 outlines the differences of the commercial floorspace provision between the January and Revised scheme.

Table 1: Proposed changes to the commercial floor areas

Commercial uses	January scheme	Revised scheme	Area change
Flexible use	4686m2 Maximum caps: <ul style="list-style-type: none"> • A1: 2000m2 • A2: 200m2 • A3: 2200m2 • B1: 2000m2 (minimum) • Community use: 1148 • Boathouse: 351m2 	5023m2 Maximum caps: <ul style="list-style-type: none"> • A1: 2,200m2 • A2: 220m2 • A3: 2,400m2 • A4: 1,800m2 • D1: 1,300m2 • Sui Gen (boathouse: 380m2) • B1: Minimum 2000m2 and maximum 2200m2 	+337m2
Office	2424m2	5523m2	+3099m2
Gym	740m2	-----	-740m2
Cinema	2120m2	1606m2	-514m2
Hotel	1673m2	1765m2	+92m2
Total	11,643m2	13,917m2	+2,274m2

Quantum of retail floorspace:

2.2 The January scheme proposed 4,686m² of flexible use floorspace, including Class A1, A2, A3, A4, B1, D1 D2 and sui generis, and was deemed an appropriate quantum that would not result in an unacceptable adverse impact on the viability and vitality of nearby centres (with conditions relating to retail mix, floor areas/unit numbers, High Street Zone, and restriction on change of use), and allowed for a balanced mixed use development.

2.3 The Revised scheme increases the flexible floor space to 5,023m². Given the significant increase in residential units now proposed, the consequential increase in overall population and uplift in available expenditure generated, and the total scale of the development, the marginal increase of the commercial floorspace and retail A1 cap to 2,200m² does not warrant an objection.

Suitability of units:

2.4 The size and frontage of the retail offerings, with the focus around a ‘High Street zone’ (with a minimum cap of 50% of floorspace being used for A1 retail), do not appear to be significantly different than previously proposed, and therefore no objection is raised.

Changes to the Use Classes Order:

2.5 Substantial changes to the Use Class Order came into effect on 1 September 2020 under SI 757, whereby many of the proposed flexible uses will be contained in the same use class. Specifically, A1, A2, A3, B1, D1 and D2 (parts of) will become Use

Class E. Sui Generis will also include public houses, wine bars or drinking establishments (formerly Class A4), Live music venue (formerly Class D2), Cinemas (formerly Class D2(a)), Concert hall (formerly Class D2(b)), Bingo halls (formerly Class D2(c)), and Dance Halls (formerly Class D2(d)).

- 2.6 Without specific conditions, the applicant may in the future be able to benefit from the flexibility of Use Class E, which could result in Council having little ability to protect the proposed commercial and retail mix within the site.
- 2.7 To ensure a balance of uses, which will cater for retail needs as envisaged in SA24 and the adopted Stag Brewery Planning Brief SPD (adopted PB), it is deemed necessary and reasonable to secure conditions to restrict the ability to move between subsections a-g of the new Use Class Order E. The Council hereby requests such a condition or conditions are imposed, particularly in relation to the retail use and with reference to the amount of each use tested in the ES accompanying the application.
- 2.8 In summary, no objections are raised to the retail uses, nor the removal of the gym, subject to conditions secured within the Planning Committee report being carried forward:
- a) To achieve a balance of different commercial units, limit the minimum and maximum retail provision, secure the minimum retail provision along the High Street, and limit the size of units. (refer to conditions NS79 - NS83 of the Councils Planning Committee report).
 - b) Secure conditions to restrict the movement between subsections a-g of Use Class E to ensure a balance and avoid an over-concentration of uses (in accordance LP 25 and 26.C)

Office (B1 floorspace)

- 2.9 The January scheme proposed 2,417m² (GIA) of office floor space; with an additional 2000m² (minimum) being provided within the flexible floorspace, creating 4,417m² on site, including adaptable and affordable workspace, and in excess of 360FTE job opportunities, all of which was welcomed.
- 2.10 The Revised scheme increases the provision of standalone B1 space to 5,523m² (there are some minor discrepancies in floorspace figures which the Council would request clarification on). Neither the Adopted Planning Brief nor the Site Allocation (SA24) are prescriptive in terms of the quantum of employment floorspace expected to be delivered on site, with the site allocation seeking a substantial mix of employment uses (B uses), including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology.
- 2.11 Whilst the site is not within a designated Key Office Area or Centre, this site represents a relatively rare opportunity to provide new office stock. With the minimum 2000m² B1 floorspace within the flexible use category and 5523m² B1 floorspace being provided elsewhere on site, the provision of 7,523m² office floorspace is welcomed (and in accordance with LP 41 of the Local Plan and E1 of the ItP London Plan) and offsets the significant loss the Borough has seen of B1 floorspace through permitted development rights. For the same reasons within the Planning Committee Report, conditions are recommended securing a minimum level of office floorspace and a condition to prevent its loss to other uses using permitted development rights.
- 2.12 The scheme also facilitates flexible B1 business accommodation, including small business workspace and co-working space, and 10% affordable office space, in line with Policy LP 41 of the adopted Local Plan and E1 (G) of the ItP London Plan. Further, the office accommodation remains in Block 5 although the additional space is within

Block 1, above the cinema. Concentrating the office use in two locations is considered appropriate and is supported.

- 2.13 Based upon the above, no objections are raised to the quantum and location of office floorspace. However, the Council would welcome and deem necessary (for the same reasons set out in the Planning Committee Report) to secure the following Heads of Terms to reflect the guidance contained within the updated Planning Obligations SPD (adopted June 2020) and adopted policy:
- Provision of 10% affordable office space;
 - Employment and Skills Plan, and
 - Workspace Management Plan.

Summary:

- 2.14 Overall, the increase in the flexible commercial space and office provision are welcomed. The increase is commensurate with the uplift in residential units, is not out of scale with the location, suggests a genuine mixed-use development, and contributes to delivering the new 'heart' to Mortlake as sought by the site allocation and adopted Planning Brief (PB).

Housing

- 2.15 The Revised scheme delivers up to an additional 427 housing units, achieved through an increase in density and height in locations across the site, amendments to the layout of some blocks, re-configuration of the internal spaces and the conversion of previously non-residential uses to solely residential.

Residential mix:

- 2.16 The overall mix within the January scheme was 11% 1beds, 56% 2beds, 30% 3beds and 3% 4beds within Development Area 1, with conditions to ensure the same mix in Development Area 2 through Reserved Matters. The Council did not object to such, given the location within an Area of Mixed Use where a high proportion of small units is considered appropriate, along with a mix providing for family sized accommodation, in line with LP35 (A) and also H10 of the ItP London Plan. Table 2 compares the indicative unit mix between the original scheme and the Revised scheme by tenure:

Table 2: Indicative unit mix

Tenure	Total		Social Rent		Intermediate		Private	
	January Scheme	Revised Scheme	January scheme	Revised Scheme	January scheme	Revised scheme	January scheme	Revised scheme
Unit Size								
1B2P	85 (13%)	384 (31%)	6 (5%)	8 (6%)	17 (60%)	67 (29%)	62 (12%)	309 (35%)
2B3P	35 (5%)	131 (10%)	6 (5%)	5 (4%)	1 (5%)	14 (6%)	28 (5%)	112 (13%)
2B4P	294 (44%)	463 (37%)	39 (35%)	44 (35%)	10 (35%)	134 (59%)	245 (47%)	285 (32%)
3B	218 (33%)	251(20%)	55 (50%)	64 (50%)	0 (0%)	14 (6%)	163 (31%)	173 (19%)
4B	33 (5%)	21 (2%)	6 (5%)	6 (5%)	0 (0%)	0 (0%)	27 (5%)	15 (2%)
Total	665 (100%)	1250 (100%)	110 (100%)	127 (100%)	28 (100%)	229 (100%)	525 (100%)	894 (100%)

- 2.17 With respect to private units, the Revised scheme increases the percentage of 1 beds to 35%, and increase the 2 bed 3 persons units to 13%, while the proportion of 2 bed 4 person units and the larger 3 and 4 beds have reduced (albeit only in real terms of unit numbers for 4 beds). As the proposal retains a mix, and is appropriate for this site and location, the scheme is in accordance with LP35 and H10 of the ItP London Plan. However, conditions are recommended to ensure the Outline element of the scheme reflects the above site. (refer to the Affordable Housing section regarding the detailed comments on the affordable housing mix, where there are objections).

Housing Density:

- 2.18 The Revised Scheme pushes the density beyond that set out within the density matrix in the London Plan (207 units and 598 habitable rooms per hectare, compared to maximum of 145 units and 450 habitable rooms within the matrix) – Refer to Table 3. The Council agrees the density matrix should not be applied mechanistically, and other factors such as local context, design, transport, social infrastructure need to be considered. However, in this instance (and as outlined in later sections of this response), the resultant density supports the view the scheme is now over-developed, and the additional height added is out of context. It supports that the January scheme as considered favourably by the Council actually also pushed at the boundaries of being within the acceptable density range, maximising the potential for the site and recognising that very large-scale brownfield sites in urban locations are rare in Richmond borough.

Table 3: Proposed Density

	Original application					Revised scheme				
No. of residential units	Up to 813					Up to 1,250				
Average hab rms per unit	3.32					2.90				
PTAL	2					2				
Setting	Urban					Urban				
Appropriate density range	200-450 hab rooms per hectare					200-450 hab rooms per hectare				
	55-145 units 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?	HA	Units per hectare	Within density range for units	Hab rooms per hectare	Within density range for hab rooms?
	5.88	138	Yes	459	No	6.07	207	No	598	No

Affordable Housing

- 2.19 A summary of the quantum and tenure of the proposed affordable housing, and as compared to the January scheme, is outlined in Table 4.

Table 4: Affordable housing quantum and tenure

	January scheme	Revised scheme
No. of residential units	813 (including assisted living)	1250 (+437) <ul style="list-style-type: none"> • 576 on the eastern portion of the Site, • Up to 674 delivered on the western portion of the Site.

No. of market units	675 (including assisted living)	894	
Number of affordable units	Up to 138	356 units	
% of Affordable units	21% by habitable room 20% by number of units	30% by habitable room 28% by number of units	
Tenure Split (number)	Affordable Rent: 76-110 units' variance due to CIL	Affordable Rent	127 units
	Shared Ownership: 19-28 unit's variance due to CIL	Intermediate	229 units
Tenure Split (habitable rooms)	Affordable Rent – 80%	Affordable Rent	<ul style="list-style-type: none"> • 36% by number • 41% by habitable rm • 40% by floor area
	Intermediate – 20%	Intermediate	<ul style="list-style-type: none"> • 64% by number • 59% by habitable rm • 60% by floor area

- 2.20 Whilst the Council welcomes any scheme which has the potential to deliver additional affordable housing and assists in meeting the Council's priority need and demand for affordable housing, a number of material objections or outstanding matters remain that the Council requests are resolved prior to the application being heard:

Quantum:

- 2.21 The quantum provided fails to meet either the Council's (LP 36) and Mayor's (H4 and H5 of the ItP London Plan) policy with respect to percentage of on-site provision.

Tenure mix

- 2.22 The Mayoral tenure mix requirements (policy H6 of the ItP London Plan) is 30% London Affordable Rent; 30% shared ownership and 40% Richmond compliant tenure mix. This equates to:

- 221 London Affordable Rent units (LAR) (62%) and
- 135 London Living Rent / Shared Ownership units (38%)

The Revised scheme proposes:

- 127 London Affordable Rent (28%)
- 229 Intermediate (72%)

- 2.23 Therefore, although there has been a slight increase in rented units, the proposed tenure mix substantially fails to comply with both the Mayoral and Richmond policy requirements. It is notably weighted towards delivery of Intermediate homes, thereby not meeting the identified tenure need within the Borough for those households on low incomes. As such, the Council would welcome:

- a) The publication of the viability review and the outcome of that viability review that justifies the departure from a tenure mix which complies with Mayoral requirements

- b) Further discussion to consider the potential for an improved tenure mix through combined Mayoral and Council grant funding.

Unit Mix

- 2.24 Notwithstanding the objections over the tenure split, the proposed mix associated to London Affordable Rent units (refer to Table 2) fits with Richmond's priority needs for affordable rented homes.

Affordability:

- 2.25 The Council would welcome the necessary exemplification that demonstrates that genuinely affordable housing is being delivered including accounting for service charge levels that would be due.

- 2.26 Affordability - London Affordable Rent (LAR): It is noted the LAR is exclusive of service charges albeit these may be a significant additional cost to an occupier particularly on schemes of this level of density (as estimated in the submission documents as between £1,560-£2,340pa). The affordability needs to take account of service charges.

- 2.27 Affordability - Shared ownership:

- a) The applicant confirms that two thirds of units will be affordable to purchasers with household incomes not exceeding £47,000 per annum, with an initial equity sale of 25% and a rent of 1% on the retained equity; the remaining third of units affordable to purchasers in receipt of household incomes of £50,000 - £60,000 for one beds and £60,000 - £70,000 for two beds. The Council would expect assurances through the wording of the S106 agreement that the Council's adopted affordability criteria for both the shared ownership and London Living Rent Homes is to be complied with (and this to include service charge).

- b) Notwithstanding (a), applying the applicant's market value to these homes (£987/sq. ft) results in minimum market value of £531,200 for a one bedroom flat. Allowing for the normal housing costs including service charges, the £47,000 affordability threshold is achievable for one bed homes. However, even at the same rent level, a 2-bedroom 3-person home will require a household income of £57,000, so the Council's requirement of two thirds affordable at up to £47,000 is not achievable in this revised scheme. The other two-bedroom homes are likely to require household incomes close to the Mayoral cap on household income. Therefore, neither the Council's affordability requirements, nor the Mayor's stated position in the London Plan Annual Monitoring Report October 2019 that shared ownership average household incomes in any scheme should not exceed £56,200 pa would be achieved.

- c) The Council is therefore concerned that in this high value part of the Borough, delivery of shared ownership homes is extremely challenging and will not ensure that they are available across a broad range of incomes and the majority of the proposed homes will require household incomes towards the top end or beyond the Mayoral household income threshold. Therefore, if such criteria evidently cannot be met this needs to be addressed and resolved at this stage before any decision is made given this is an adopted policy requirement to secure low cost homeownership to a spread of incomes. If this is not through shared ownership sales, the Council would welcome details as to how this requirement be met (e.g. through conversion of units to intermediate rent/LLR where there is more control of affordability through the rent setting process).

- 2.28 London Living Rent: The London Living Rent (LLR) homes (within Buildings 10, 14 and 18) are based on the GLA ward based rent specified, and will require a household income of around £64,000, above the Mayoral household income threshold for LLR of £60,000. Consequently, the Council does not support the delivery of three-bedroom LLR homes in this high value location, unless the rent level is reduced below the GLA ward based rent levels. The Council therefore requires clarification on this matter. A possible alternative would be to swap these homes with smaller LAR units, thereby improving viability and potentially increasing the number of larger family size LAR homes.

Financial Viability

- 2.29 Following scrutiny of the viability of the January scheme, by the Council's assessors (GL Hearn/Carter Jonas), the profit output remained significantly below what the Council considers to be an appropriate return and, therefore, the affordable housing offer of 17% affordable housing provision was considered the maximum reasonable amount. The Revised scheme increases the affordable housing offer to 30%, based on an indicative offer, approximately 356 units (28% in terms of total unit numbers). The shortcomings with that offer in terms of securing genuinely affordable homes are noted above.

- 2.30 The Revised scheme has tested a 30% affordable housing provision in order to provide a robust assessment, however noting the final affordable housing level is subject to further viability testing and further discussions with the GLA. An updated Addendum Viability Assessment by BNP Paribas (June 2020) has been submitted which:

- a) Outlines at 30% affordable housing by habitable rooms, the scheme generates a profit that is significantly lower than the target levels as outlined in the viability report. However, the Council would like to confirm it did not agree the profit targets as outlined in Table 4.1.1 of the Viability Report, as implied in the submission. As outlined in the Council's committee report (para. 7.1.68), the Council deemed the target profit for the private accommodation should be 17.5% rather than 20%.
- b) Significant levels of sales value growth will be required to generate a 'normal' level of profit, even assuming build costs remain unchanged over the development period; in the current market this would seem unlikely to be achieved.
- c) Development can only be brought forward on the basis of significant growth in sales values, which will clearly be a significant additional risk in "normal" times but at the current time the Council queries whether the scheme is actually viable as a result.
- d) Concludes the modelled percentage of affordable housing (30% of habitable rooms) therefore exceeds the maximum reasonable proportion; therefore less affordable housing than the Revised Scheme proposes might be more appropriate and might result in more genuinely affordable homes rather than simply achieving a greater percentage of products that can be called affordable homes but will not meet the greatest area of demand, social rent.

- 2.31 The final content of the affordable housing to be delivered is dependent on ongoing discussions between the applicant and the GLA, which the Council has not been party to. However, the Council notes the Financial Appraisal addendum leaves several significant matters unresolved and welcomes further consideration of these points with the aim of improving the affordable housing content:

- a) Agreement on the Benchmark Land Value in response to considerable difference between the values assessed by the Council's and the applicant's financial consultants.
- b) The absence of Registered Providers (RP) offers for the proposed affordable housing to inform viability (contrary to policy LP 36 and para 9.3.4 of the Local Plan).

- c) The retention of basement parking (albeit reduced in area) for the whole development and the resultant impact on viability.
- d) The financial appraisal continues to use formula based blended values for the affordable housing. These do not appear to reflect values (excluding Mayoral grant) evidenced by RP offers for recent developments in the Borough. The blended valuation under-states, by approximately £1.0m, the actual value applying the respective values to each tenure and an updated indicative offer for the affordable housing should also be obtained as a minimum from a Registered Provider operating within the Borough to inform viability.
- e) In the January scheme it was evident that there was potential to increase the number of affordable homes in Building 18 and other buildings through making more efficient use of the gross floor area in compliance with nationally described space standards. This was reflected in the proposed wording of the Section 106 which allowed for an increase in the number of affordable homes following a review of the content of building 18. This remains a concern in the current indicative plans whereby a significant number of units exceed national floorspace standards by more than 10% - a total of more than 600m². More efficient use of Building 18 will enhance its value and thereby improve viability.

2.32 Given the proposal falls short of the 50% provision as set out in Local Plan policy LP36 (and the strategic target set in H5 and H6 of the ItP London Plan), to ensure compliance with the Development Plan, the Council requests the GLA robustly scrutinises the viability report and the scheme internal layout (taking into consideration the above points) to ensure the maximum reasonable provision of affordable housing is being delivered.

Public Grant funding / further modelling

2.33 The GLA has previously confirmed its willingness to facilitate discussions on the Council's potential to improve the affordable housing content through use of Mayoral grant together with the Council's Housing Capital Programme funding. The Council welcomes the opportunity to discuss this further, prior to determination of the application, with the aim of positively adjusting the approved affordable housing (unit numbers and/or tenure mix).

2.34 The Council would welcome further modelling to ascertain whether the number of London Affordable Rent units can be improved with the support of the Council's Housing Capital Funding.

2.35 The Council would seek appropriate S106 clauses to determine whether public grant (both Mayoral, applying the enhanced grant rate for Affordable Rent) and Richmond Housing Capital Programme funding can further improve the delivery of Affordable Rented homes.

2.36 The Council would welcome further investigation into maximising the potential units within Development Area 2, making the most efficient use of the site in line with para's 122, 123 and 127 of the NPPF. (As outlined within the Council's Planning Committee report, there were concerns regarding the oversized units and the opportunity to deliver additional habitable rooms through optimisation, rather than additional mass and height. The Planning Statement Addendum suggests the same logic has been applied to the revised scheme to reduce the size of the units where possible, however, no details are provided).

Marketing

2.37 The submission confirms the Intermediate units will be marketed to local people for 3 months. The GLA has previously supported a period of local marketing and

prioritisation on other schemes, and therefore, the Council recommends any Section 106 incorporates a clause requiring the Applicant to provide a marketing plan, which sets out how the intermediate housing will be marketed and for a period prioritised for sale or letting to those living or working in the borough of Richmond in housing need. Such an approach not only helps address the identified local borough level need and demand for such accommodation but helps demonstrate to residents more generally the local benefits of new development. This would also tie in with the reason why the application was originally called in by the Deputy Mayor for consideration.

Phasing

2.38 The timing of the delivery and availability of the affordable units is a matter which should be secured in the S106 agreement, particularly to ensure early completion of the affordable homes in Phase 2. The Council is concerned as to the lack of clarity of when the affordable housing would be provided and the trigger for affordable housing provision being built and completed:

- a) Currently 38 shared ownership/LLR are to be provided in Building 10, during Phase 1 (totalling 576 homes) of the scheme. Current indicative phasing suggests that Phase 1 would be completed within a 3-year period and a further 30 months before completion of Phase 2. Thus, the remaining 318 affordable homes including all the London Affordable Rent units will only be completed after more than 5 years from commencement. (This is despite the submission confirming the early delivery of units in Buildings 14, 18, 19, 20 and 21 within Development Area 2). The two phases will need to be tied together to ensure that delivery of phase two is triggered by a point in phase one to prevent the developer delivering the private sale units and nothing further. This also needs to be considered in the overall phasing to ensure delivery of the other benefits which provide the new heart to Mortlake.
- b) It is self-evident and a planning consideration as to the risks to delivery of the planning commitments being made. Effectively allowing such a significant back ending of the affordable housing commitment must be identified as a risk particularly if the financial viability shows either a marginal residual value or deficit. The Council notes that requests by the applicant to change tenure, size mix etc. are likely to increase the longer the delivery of the affordable housing is delayed. Therefore, the Council would seek consideration of the potential for Building 10 to include some of the proposed affordable rented homes so that the Council's priority housing needs are at least partially met in an early phase of the scheme and that the early phasing of delivery of the affordable housing in Phase 2 is also secured. This would also provide a better outcome in terms of securing a mixed and balanced community with affordable housing through the development.

Review mechanisms

2.39 By reason of the scheme not meeting the 50% on site affordable housing provision requirement, and given the likely development programme, the scheme must be subject to the following viability reviews in accordance with H5 of the ItP London Plan, the Mayor's Affordable Housing and Viability SPD, LP 36 of the Local Plan and the Council's Affordable Housing SPD in order to review the viability of providing affordable housing:

- Early Stage Review – Prior to the start on site
- Prior to the start on site on Development Area 2 (west of Ship Lane)
- Late Stage Review given the level of affordable housing being proposed which is significantly below that expected by the local and regional planning authorities.

- 2.40 Such review mechanisms, secured within the S106 Legal Agreement, must be with the aims:
- To enhance the level and tenure mix of affordable housing to achieve a better level of compliancy with policy objectives.
 - To assess the impact of Mayoral and Council Housing Capital Grant support to improve the number of affordable units and/or to improve the tenure mix

- 2.41 The appropriate GLA formula review mechanisms are required in order to demonstrate the necessary rigour in establishing a deficit position (if there is one) on an evidential basis.

Summary:

- 2.42 Whilst the improvement to the affordable housing provision is welcomed, adopted development plan policies and guidance need to be addressed. An additional numerical achievement of a percentage of affordable housing does not simply outweigh other concerns, including unit size and tenure mix to make it truly affordable to meet local need. This is a very rare opportunity in the borough to secure a development which makes the best contribution to place making and it would be wrong not to secure a mixed and balanced provision of homes for future generations. A clear planning objective is to achieve sustainable development with infrastructure in place to support the new population and it is not clear that these changes, supported by the London Mayor, would achieve this. The Council has set out above a number of shortcomings and areas of concern which underline why it continues to have reservations regarding the content and delivery of the affordable housing namely:

- a) The weighting of the tenure mix towards intermediate homes, is contrary to adopted Development Plan policies (LP36 of the Local Plan and H6 of the ItP London Plan).
- b) The affordability of the Intermediate homes, a large proportion of which are likely to require household incomes close to, or above, the Mayoral household income cap.
- c) The Council would expect that overall housing costs should be affordable to the Council's income threshold for shared ownership and the Mayoral threshold for LLR, as well as those which would be assumed for LAR.
- d) The substantial risk to delivery of affordable housing given that the phasing of delivery fails to provide any homes for affordable rent an early stage of the overall programme and only a small proportion of the total number of indicative total of affordable homes are to be provided in the detailed Phase 1, with consequent potential reduction of the affordable rented content arising from viability testing of Phase 2 on receipt of detailed proposals.
- e) That the final position on financial viability including confirmation of RP offers for the proposed affordable housing and consideration of the impact of Mayoral and Richmond Council grant funding and hence confirmation of the affordable housing content and tenure is yet to be agreed.
- f) The indicative layout of Phase 2 offers potential for an increase in units through better use of the floor space to be provided.
- g) The potential for the Council's Housing Capital grant funding to be used has not been explored.
- h) The proposed triggers for provision of affordable housing within the section 106 are not available for scrutiny: if the Council was referring to the Mayor at Stage 2 then a full draft section 106 agreement would be available at that point and the Council should be afforded the same courtesy.

- 2.43 Notwithstanding the above objections, if the Mayor is minded to approve the application, the Council requests the following matters are addressed in any Section 106 Legal Agreement:

- The development should seek to ensure affordability of the intermediate housing across a range of household incomes through the share purchased and the level of rent on the unsold equity including a requirement that the Registered Provider should set the equity share and rent on the unsold equity in order to achieve the Council's requirement that two thirds of the shared ownership homes (including disposal of LLR homes as shared ownership) are affordable for a household income of £47,000. If this cannot be achieved an alternative approach to the provision of intermediate housing should be required given there is a clear and evidenced need and demand locally for low cost intermediate housing at the income threshold of £47,000 identified.
- Phasing details to secure the timing of the delivery of the affordable homes with reference to provision of other facilities, including the school, and triggers which relate to occupation or sale of market units.
- Confirmation on the real affordability of all the affordable homes taking account of the impact of service charges.
- Review clauses to test the viability of improving the delivery of affordable housing (both increase in numbers and increase in the number of homes for Affordable Rent so the scheme meets a tenure mix which is more compliant with Local and London Plan requirements) through the application of Mayoral and Richmond Housing Capital Grant funding and through GLA formula review mechanisms:
 - Ensuring that the inputs, including deficit position, are fully evidenced and tested.
 - An Early Stage Review if the planning permission is not commenced within and agreed timescale.
 - A Public Grant Review prior to commencement to assess the potential for public grant (both Mayoral and from the Council's Housing Capital Programme) to increase the amount and/or alter the tenure of the affordable housing to improve affordable rented delivery.
 - A Mid Stage Review to be conducted during both Phase 1 and Phase 2, specifically to ensure there is the ability to incorporate any additional uplift within the scheme.
 - A Final Stage Review to be conducted on completion of both Phase 1 and Phase 2 to determine whether an Affordable Housing Contribution is to be provided.
 - An overarching clause to determine that 'Implementation' does not include completion of basement works in order to avoid undue delay in complying with the above clauses.
 - Depending on the overall phasing, the financial reviews conducted during Phase 1 could enable the provision of additional affordable housing either during Phase 1 or Phase 2 or both.
 - Details of the arrangements to ensure residents' access to the proposed communal areas, ensuring this covers all communal areas.
 - Car parking provision for the affordable homes to be on the same basis as the mechanism for determining the availability of parking for any homes for private sale and for the mechanism and management of it to be agreed by the Council.
 - Consultation and engagement with the Council's Specialist Occupational Therapist to ensure compliance with Building Regulations M4(3)(2)

Care Village:

- 2.44 The Revised scheme converts the 'Care Village' to residential use to provide smaller units. Whilst the Council's Planning Committee report did not object to the Care Village as part of the overall housing mix, given this is not a priority local housing need, no objection is raised to its removal.

Housing delivery

- 2.45 The call-in letter and report of 4 May 2020 contains some inaccuracies regarding housing delivery. It suggests the Council's affordable housing delivery is significantly below Richmond's Local Plan target of 50%, referring to Core Strategy Policy CS4 as setting a local borough-wide target of 50% affordable housing, equating to a numerical target of 158 homes per year. It provides data on recent delivery between 2016-2019, suggesting homes delivered at 95% of target and affordable homes delivered at 37% of target:
- a) Such figures have been compared to the Council's monitoring data sources, and the Council's provisional figures for 2019/20 are 332 completed residential units.
 - b) With respect to the Council's adopted affordable housing policy, this is LP36 of the Local Plan – not CS4, which appears to reference another borough.
 - c) Although policy LP36 sets a borough wide target of 50%, this is not expressed as a numerical target. Policy LP36B sets out more detail on how this will be achieved which includes for example financial contributions from small sites whereby 50% will not be achieved in terms of on-site provision.
- 2.46 Overall, therefore, while the Council is striving to increase delivery of affordable housing (and recognises the importance of potential delivery from this site), there are some inaccuracies in the GLA's data and how the under delivery is represented.
- 2.47 In addition, in terms of the baseline position, the Council has positive evidence of a five-year housing land supply, and the Council has not failed the Government's Housing Delivery Test (2018 and 2019 when measured against the current London Plan housing target). The Council's regular Annual Monitoring Reports on Housing show the details of the five-year housing land supply:
- In 2017/18 1,434 units were identified, a five-year housing land supply of 5.5 years.
 - The 2018/19 Housing AMR data shows (position as at 1 April 2019) an identified 1,474 units, a five-year housing land supply of 6.3 years.
 - The 2019/20 Housing Interim Position Statement identifies 2,208 units for the 5 year land supply, exceeding the target of the 2,099 units of the ItP London Plan
 - The results of the 2018 Housing Delivery Test for Richmond showed 1,332 homes delivery 2015/16 to 2017/18 against 945 homes required, a measurement of 141% and therefore no action required.
 - The results of the 2019 Housing Delivery Test for Richmond showed 1,147 homes delivery 2016/17 to 2019/20 against 945 homes requirement, a measurement of 121% and therefore no action required.
- 2.48: Each site has been assessed for its deliverability, in discussions with Development Management officer and using monitoring resources, for clear evidence that completions will begin within five years, to accord with NPPF and PPG guidance.
- 2.49 With respect to housing delivery, as summarised below, the Council has not only been meeting its annual housing delivery target in recent years but exceeding that target. Whilst the New London Plan has yet to be adopted and the timetable for progressing is very unclear, it is anticipated that this will increase the housing target to 411 dwellings per annum, which is deemed to be achievable. The Council has already consulted on the Direction of Travel for a new Local Plan which is now under preparation; in that regard any update the Mayor can give on the timetable for the emerging London Plan would be helpful. It is noted that the number of affordable units

which the Council would want to deliver has been maximised through rigorous and robust assessments of the viability of schemes delivering any net increase in dwellings, it is one of few authorities that has successfully made that case at Local Plan Examination. As the Mayor will be aware national, London and local policy is predicated on scheme viability with the only element of a scheme that can flex being the affordable housing provision: criticising the failure of the Council to achieve delivery of affordable homes in the knowledge that the system is set up in that way is unfair. Given the scale of this scheme and its rarity in the context of a borough which is heavily constrained this proposal should now be subjected to rigorous and robust assessment in the same way to ensure that the delivery of affordable housing is maximised. The Council asks the Mayor to do so in the knowledge of its importance to the overall delivery pipeline of homes, including affordable homes; it is hoped that the Mayor would understand the necessity of following the Development Plan in relation to this requirement. Further in considering the planning balance the Mayor should be cognisant of the failure of the scheme to meet policy requirements in relation to affordable housing and afford weight commensurately.

3.0 Siting and design:

- 3.1 In terms of design, the NPPF sets out, “*design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics*” (para. 125) and “*permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents*” (para. 130)
- 3.2 The Local Plan, adopted in 2018, clearly sets out the vision for building height, stating new buildings should respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building heights and respect the local context, through appropriate scale, height and mass (LP2).
- 3.3 Further, the borough-wide Sustainable Urban Development Study identifies that higher density development would only be appropriate in the main centres, with tall and taller buildings clustered close to Richmond and Twickenham Centres. And, elsewhere taller or tall buildings are likely to be inappropriate and out of character with its historic context and local distinctiveness. The adopted Planning Brief also sets out height parameters for the site to ensure this reflects local context.
- 3.4 The Council is committed to making the most efficient use of sustainably located brownfield land (in accordance with para’s 117-127 of the NPPF), however, that is not to say that the plan-led system should not be followed (para 47 of the NPPF) or that development should come wholly at the expense of other material considerations, in this case, and as will be outlined:
- to the detriment of the local character and context (par 127c of the NPPF and LP1 of the Local Plan);
 - to the detriment of designated and non-designated heritage assets (para’s 189-197 of the NPPF, HC1(c) of the ItP London Plan and LP 3 and 4 of the Local Plan);
 - to the detriment of residential amenity (LP8).

A planning balance needs to be applied which has proper regard to the requirements set out in the NPPF and in law.

Footprint and layout:

3.5 The Block footprints remain as per previously proposed with the exception of Blocks 18, 19, 20 and 21 (to the north west corner of the Site) and minor footprint changes to Blocks 2, 3, 7, 8, 11 and 12 as a consequence of aesthetic amendments. Whilst the principle of the siting of the buildings is not of concern, the combination of additional height, does introduce new objections, both on design and residential amenity grounds.

Height:

3.6 The adopted PB sets out maximum heights that would generally be acceptable. Whilst the Council acknowledged the January scheme did exceed these in numerous locations, the proposed scheme was found to relate to the existing urban grain and scale and not harm heritage assets or residential amenity.

3.7 The Revised scheme proposes a significant increase in building storey heights across the site, of up to 3 storeys, as summarised within Table 5 and Plans 1 and 2.

Table 5: Increase in building storey heights

Block number	January scheme	Revised scheme	Change?
1 – cinema	4	5	+1
2	7 and 8	8, 9 and 10	+1-3
3	6	7	+1
4	8	8	-----
5	3	3 and 4	+1
6	4	5	+1
7	7 and 8	9 and 10	+2
8	6, 7 and 8	9	+1-3
9	4 and 5	5	+1
10	4 and 5	5 and 6	+1
11	7	9	+2
12	6 and 7	7 and 8	+1
13	4 and 6	4 and 6	-----
14	4 and 5	4 and 6	+1
15	6	8	+2
16	5 and 6	6 and 8	+1-2
17	5, 6 and 7	7 and 8	+1-2
18	4, 5 and 6	3, 6 and 7	+1
19	4	3-4	-----
20	3	4	+1
21	3	4	+1

Plan 1: January scheme



Plan 2: Revised scheme



3.8 Consequently, most of the buildings now exceed the maximum heights as expressed in the adopted PB, a significant material planning consideration, refer to Plan 3:

Plan 3: Overlay of Revised scheme building heights with maximum heights expressed in the adopted Planning Brief



3.9 Whilst the Council recognises the additionality in terms of housing added to the scheme derived from the additional height, and recognises that there may be some locations in London where this could be successfully achieved; in this instance there are several unwelcome outcomes of the additional height contrary to the guidance in the Planning Brief:

The Maltings and Mortlake Conservation Area (Heritage assets):

3.10 The adopted PB states, “new buildings should be less than the height of the former Maltings Building and development should consider views of this building to ensure this is not obscured or subsumed by new surrounding development.” This is reflected in both policy LP5, which requires development to respect the setting of landmarks, and LP18 and the Thames Strategy SPD which requires developments to ‘respect the setting and views of Thames Bank.... the Granary Building....’.

3.11 The January scheme incorporated heights of 6-7 storeys adjacent to the riverside, allowing for The Maltings to be the prevailing building, as sought by the adopted SPD. Blocks 7, 8, and 11 (adjacent to the Maltings along the riverside) in Revised scheme increase in height to 9 storeys each and Block 2 (to the south of the Maltings) increases to 8 storeys.

3.12 Consequently, the BTM Maltings building no longer stands out visually as before, with tall ‘looming’ buildings behind and adjacent to it when viewed from the riverside (as illustrated below), harming the view and setting of this designated landmark building, and the special characteristics of this river reach setting. This opinion is supported by the ES, which concludes (with respect to The Maltings building and Mortlake Conservation Area), “a minor adverse impact has been identified, compared to a previous minor beneficial impact assessment”, and the impact is driven by “the

increased building heights reducing the prominence of the Maltings Building". This conclusion set out in the ES is in direct conflict with the Planning Statement that states, *"the Maltings building's prominence in views has been respected, with height increase nearby limited"*.

January scheme



Revised scheme:



- 3.13 The scheme is thereby contrary to local policies (LP4) and national guidelines. Historic England Tall Buildings guidance states, *"a high quality scheme will have a positive relationship with:....'...character of place, heritage assets and their settings,important views including prospects and panoramas.. (4.5)"* and directly in conflict with the adopted PB. It is also noted that policy D9(d) of the ItP London Plan states that *"proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm."*
- 3.14 The applicants seek to justify the harm through the provision of new photographs within the ES, taken in the 1930s and 1960s and stating, *"this should be considered in the context of the large brewery buildings which were located here in the latter half of the 20th century"*. However, these are historic photographs, and not relevant in the consideration of the current context, it would be crass to consider a scheme acceptable now based on what was on the site in the past and no longer in existence. The context in which Planning Briefs, Supplementary Planning Documents and Conservation Areas have been formally adopted, require this building not to be obscured, subsumed and its settings to be respected.
- 3.15 The applicants has also put forward public benefits, including the delivery of 1250 new homes, to justify the harm caused to heritage assets. However, as previously outlined, the Council has positive evidence of a 5year housing land supply, has not failed the government's Housing Delivery Test, and anticipate the ItP London Plan targets achievable. As such, and in line with the NPPF, it is not deemed the harm to the significance of these heritage assets has clear and convincing justification.

River Frontage:

- 3.16 The Adopted PB recognised that if taller buildings were necessary to make the scheme viable, these must be located within the core of the site, provided:
- a) the height diminishes towards the perimeter of the site and along the riverside
 - b) buildings along the riverside should not over dominate the towpath and the riverside environment.
 - c) buildings include variations in height and roof profile.

- 3.17 Whilst the January scheme varied from 4, 6 and 7 storeys along the riverside, the Revised scheme proposes three adjacent blocks to have a uniform storey height of 9 storeys, with no reduction towards the river. Whilst these buildings have some variance of roof design, the outcome is a much greater presence and wall of development on the adjacent towpath and River Thames, affecting protected views safeguarded through LP5 (View 2a Mortlake and View 3 Chiswick Bridge) and designated Metropolitan Open Land (MOL), compromising its open character and setting. Policy D9 (f) of the ItP London Plan states that "*buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river*".

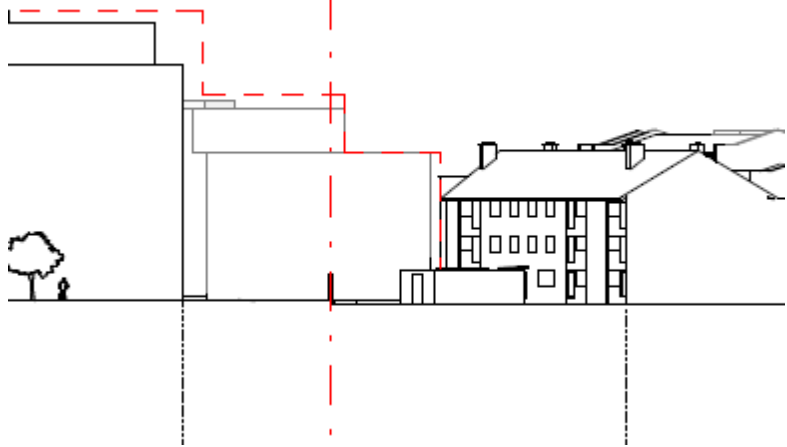
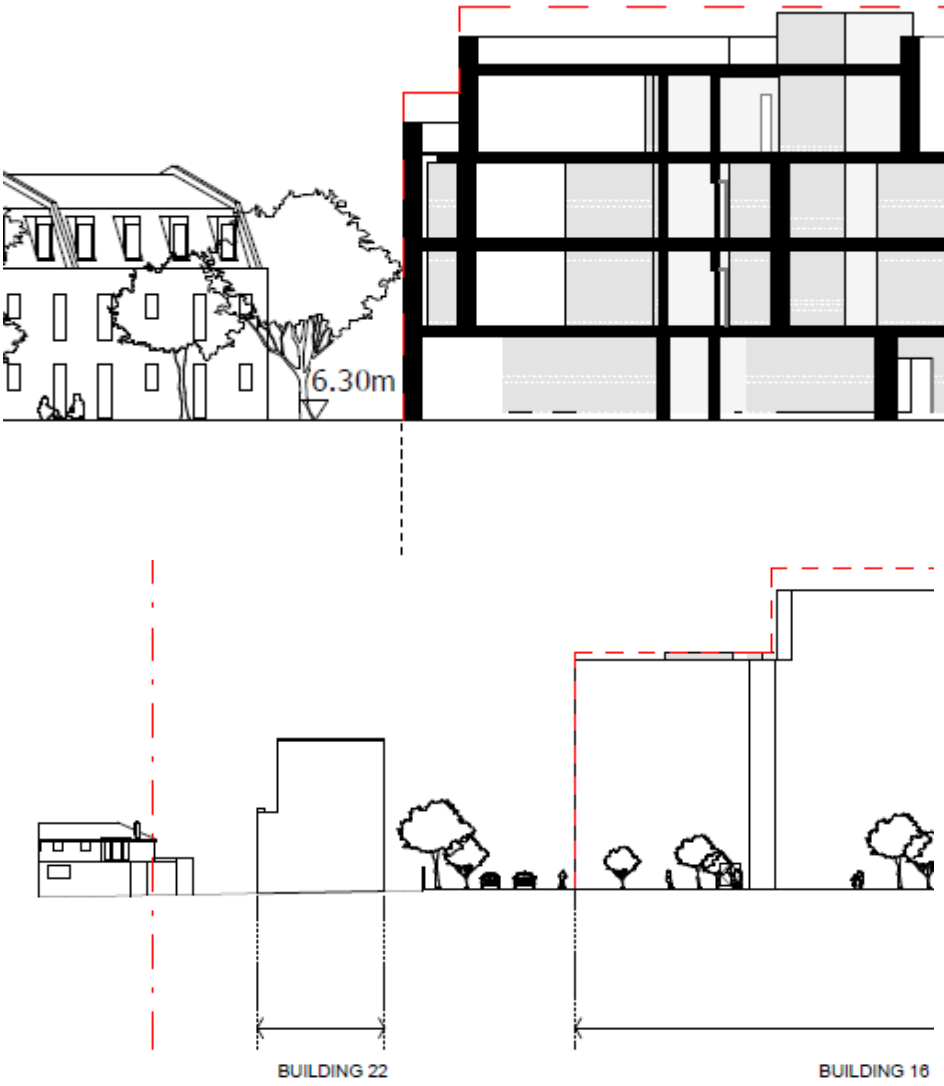
Relationship of buildings within the development:

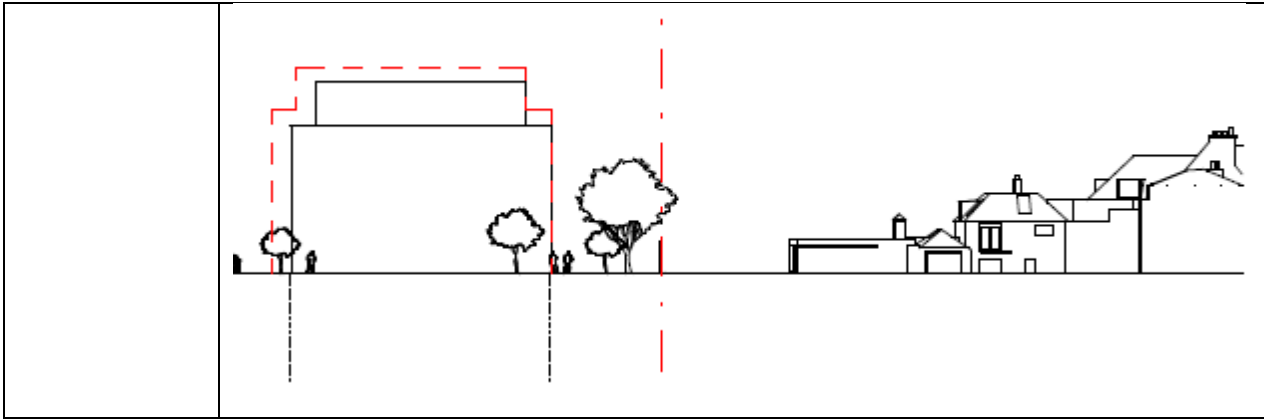
- 3.18 Unlike the development adjacent to the river, which sees no lessening of height, as sought by the adopted PB, the Revised scheme does diminish its height adjacent to Lower Richmond Road and Mortlake High Street, partially due to the retention of perimeter buildings, which are non-designated heritage assets. However, given the significant increase in height of Blocks 2, 7, 8 and 11, and the consequential difference in height with the former bottling plant and hotel (Building 5), the cinema (Building 1) and Building 6, the outcome is an unwelcome juxtaposition. The difference in height is significant, varying between 4 and 5 storeys, some of which are double the storey number of those buildings on the south boundary, and causing an unacceptable visual presence, overwhelming and engulfing the modest scale, character and setting and significance of these heritage assets.

Development Area 2:

- 3.19 Building 18 has been reduced to 3 storeys adjacent to Williams Lane, increasing to 4, set back from the façade. No objections are raised to such. However, Block 18 (formally 19) has increased from 4 to 6 storeys. Such increase in height is wholly unsympathetic to the predominant character of the low-rise flats and houses, and by reason of such height, depth and massing will overwhelm the modest 3 storey flatted development of Reid Court. There are also particular objections regarding the height immediately to the rear of the listed buildings on Thames Bank, with such increase likely to have a negative impact on their setting (refer to Table 6), and the potential visual impact is quite apparent in the visualisation from Chiswick Bridge

Table 6: Sections through the site

<p>Relationship with Reid Court</p>	
<p>Relationship with Thames Bank</p>	 <p>6.30m</p> <p>BUILDING 22</p> <p>BUILDING 16</p>



- 3.20 Given the increased height across Development Area 2, raising up to 8 storeys, the Council now questions the suitability for this part of the application to be considered in Outline. As set out in adopted policy LP2, full planning applications should be submitted for any building that exceeds the prevailing building height within the wider context and setting. Given the increase in height in Development Area 2, beyond that outlined in the adopted planning brief SPD for the site, and the height considerably exceeding the building height of those properties in Thames Bank and Williams Lane, this aspect of the scheme should be fully detailed to demonstrate the scheme both preserves the setting, character and appearance of the listed buildings and their significance on Thames Bank and improves the character and quality of the area in general, as sought by the NPPF.
- 3.21 The Design Code outlines measures to reduce the impact on height. The Council seeks clarification on the following statement within section 3.4.1 of the Design Code, where the first and last sentences appear to contradict each other. The Council requests the set back is a ‘**must**’.

Height of Buildings

*A set back to the upper floors of buildings **should** be incorporated in circumstances where:*

- *Improvements to daylight penetration to residential courtyards is required*
- *A lower parapet level is required to more closely relate to an existing streetscape.*

*In the above circumstances a single step **must** be incorporated and the step **must** be either one or two storeys in height.*

Townscape Views

- 3.22 The harm derived from the additional height is clearly illustrated in the series of the townscape views and visualisations provided, of which Table 7 provides a summary.

Table 7: Visualisations and Townscape Views

Mortlake Green area	
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- The former hotel, designated a BTM, is clearly overwhelmed by the incompatible height of Blocks 6, 7 and 8 to its north
- Western turret appears 'fat' and somewhat ungainly. Fenestration would be improved on this tower if it had more vertical emphasis;

**High Street
(Thames
Street)**



- Height differential between 2 sides of the street appears unbalanced

**Lower
Richmond
Road / High
Street
junction**



- The proposed height of the buildings along the new High Street have a negative impact on Bottling Plant BTM
- The additional 'modern' floor on Bottling Plant is overly prominent and obtrusive / incongruous;

**River view
towards
Riverside
Square**



- Front larger gables would benefit from more vertical fenestration

**Chiswick Bridge
Bridge
(page 68)
and Dukes
Meadow
(Page 69)**



- Unacceptable. The Maltings building is overly crowded, with the proposed height looming over designated and non-designated heritage assets, harming their significance.

Elevational treatments

- 3.23 The following comments relate to solely elevation design and treatment, rather than height which has previously been considered:
- 3.24 Building 1 – Cinema: The external design of the cinema building has been significantly changed and reconceived. The use of the cinema at a lower level internally has a positive impact for the townscape at upper floor level given dead frontages appear to be avoided and the relationship with the Jolly Gardener PH, designated a BTM, is acceptable. The amendments made in September to reduce the height of the 3rd floor (by 2m) have overcome initial concerns over the proportions of this upper floor. However, concrete walls are proposed to be coloured to relate to the adjoining BTM. However, a more buff finish might be an alternative to balance the buff coloured building on the other side of the green route.
- 3.25 Building 2: The widened bays and gables assist to break up massing of the building, however, further amendments are recommended to reduce height and scale:
- a) Fenestration to have a more vertical emphasis on the widened gables, particularly from the visuals on the tall elevation of Block 2 (south elevation).
- 3.26 Building 3: Minor amendments to the articulation of the façade. No objections

- 3.27 Building 4 –The Maltings (BTM): Additional plant at roof level is unfortunate, however, no objection raised.

- 3.28 Building 5: Former Bottling Plant and Hotel (BTM): Whilst no objections are raised with the replacement of the 2 storey link building with single storey (although this is still shown as two storey in the illustrative views within the Design and Access Statement), the amendments to the eastern element of the bottling plant, namely the replacement of the double pitch roof to a flat roof and additional floor, are retrograde, removes the clear distinction between the new roof level and main building, upsets the sensitive balance that was previously achieved between gaining additional floor area without appearing overly dominant, and constitutes a visually intrusive addition that harms the character of this non-designated heritage asset (LP 4). Further:
 - the additional floor has no correlation to the design and fenestration of the building below, representing a highly unsympathetic addition.
 - the amendments to the fenestration on the north elevation compromise the hierarchy of openings, typically found on this building. Refer to images below:



REVISED PROPOSAL: ILLUSTRATIVE VIEW OF BOTTLEWORKS SQUARE (including Building 5)



REVISED PROPOSAL: BUILDING 5 SOUTH ELEVATION



ORIGINAL PROPOSAL: BUILDING 5 NORTH ELEVATION BAY STUDY



REVISED PROPOSAL: BUILDING 5 NORTH ELEVATION BAY STUDY

- 3.29 Building 6: Same design approach as original scheme, and thereby no objections. However, the south elevation 02 and Design and Access Statement incorrectly shows the glazed link to Building 5 as 2 storeys, whereas, this is now single storey. Corrected drawings required.
- 3.30 Building 7: Same design approach followed, and the double width gable bays are successful in breaking up the massing on the longer east and west elevations. However, the north elevation incorporates only one double gable bay, which exaggerates the tall narrow nature of these elevations, which is unfortunate and a weakening of the design.
- 3.31 Building 8: The quality of the composition of this building has declined. Previously the massing was reduced through the gradual step up from 6 storeys adjacent to the river to 8 storeys. The revised scheme proposes 9 storeys throughout, with double height mansards. There are insufficient visual relief within the elevational treatment to reduce such scale, and thereby appears monotonous and overly busy. By nature of its narrow footprint, the three additional floors on the north elevation result in this elevation appearing awkward, with the gables squat like.
- 3.32 Building 9: Same design. However, the Council requests clarification on its height. The Design and Access Statement indicates 5 storeys, with the removal of the set back as secured in the January scheme. However, the elevations, floor plans and views indicate the setback, which are supported.
- 3.33 Building 10: Whilst there is additional height and no longer the set back of the upper floor off the western façade, the scheme follows the previous design approach, of which there is no objection. However, clarification is sought over the height. The Design and Access Statement indicates this is proposed to be 5-6 storeys, with the set back off the west façade, however, the elevations and floor plans indicate otherwise, with a set back from the south façade.
- 3.34 Building 11: Whilst this follows the same design approach to the January scheme, the double height mansards, the narrowness of the gable bays and roof form of the gables are unwelcome amendments, which only emphasise the height of the building.
- 3.35 Building 12: Whilst increased in height, the building maintains the design approach of the January scheme, with variety at roof level and gently steps up in height. No objection.
- 3.36 Development Area 2: The Design Code has been amended and Development Area 2 remains to be subdivided into 3-character areas:
- i. Terraced town houses – a reduction
 - ii. Residential square building – increased area
 - iii. Replacement of the care village with the Garden Courtyard Building.
- 3.37 The typologies are similar to those previously identified. It is requested consideration is given to the reduction in the overly large dormers proposed for the townhouse typology, which are out of character with the locality.
- 3.38 Whilst the Design Code states the entrance for the affordable and private homes will have the same design and quality (para. 3.1.7), the Council requests this is extended to confirm the design will be ‘tenure blind’.

Design Scrutiny:

- 3.39 The ItP London Plan policy D4 ‘Delivering good design’ states “*The design of development proposals should be thoroughly scrutinised*”....and “*proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E*”.
- 3.40 The Richmond Design Review Panel was established in 2018, post submission of the original applications. Therefore, whilst the scheme was reviewed by Council conservation and urban design officers prior to submission, it was not scrutinised by an independent design review panel, nor based on the principles set out in Part E of policy D4. The Council considers that the Revised scheme should have been referred to the Mayor’s Design Advocates (MDAs), in line with the aforementioned policies particularly given the deviation from the both the development plan and adopted Planning Brief which is a material planning consideration which should be afforded significant weight.
- 3.41 Given the sensitivity of this site’s location, the height of the development (significantly exceeding the parameters established within the Planning Brief SPD); the siting within and adjacent to conservation areas and within the setting of listed buildings, landmarks and views, the Council would welcome an explanation as to why the scheme has not been referred to the MDA’s, and details of the relevant material planning considerations that warrant a departure to this approach for this case.

Design summary

- 3.42 It is most unfortunate and regrettable that the proposals have been modified by increasing heights quite significantly, with harmful impacts on the immediate townscape, setting of landmarks and designated and non-designated heritage assets, and wider views and urban grain.
- 3.41 It is noted that the ItP London Plan requires Councils to consider carefully the heights of new development against local context (Policy D3 (11) and to ensure that detailed work is brought forward making clear what height might be acceptable (I.e. as outlined in the adopted Planning Brief). This emerging policy should be afforded weight in the decision-making process here, yet local context and the harmful impact on that context appears to have been disregarded by the amendments proposed. The Planning Brief which does provide that contextual assessment and resulting guidance for development of the site is a relevant material planning consideration and should be afforded significant weight.

4.0 Internal living standards

Wheelchair accessible homes

- 4.1 The submission confirms, in line with the Mayor’s Housing SPG, 90% of the residential units within the detailed element of the Site will be provided as accessible and adaptable dwellings, with the remaining 10% provided as wheelchair user dwellings. Building entrances, access to refuse stores and relationship to car parking (where relevant) have been designed to provide inclusive access. Mandatory requirements included within the Design Code will ensure inclusive access for the units within the outline component.
- 4.2 Whilst some units have been specifically identified as being designed as wheelchair accessible, insufficient details have been provided to confirm that the 10% requirement has been met in relation to the proposed affordable homes. As a result, further

consideration (and confirmation) is required to ensure that the adopted policy requirement set in LP35E for 10% of the units (i.e. 125 across all tenures) are to be provided and to ensure compliance with M4(3). Further, it is requested the Section 106 includes a clause to enable the Council's Specialist Occupational Therapist to liaise with the developer in order to ensure that the identified homes are constructed to Building Regulation requirements (M4(3)(2)(b)).

Internal space standards:

- 4.3 The Planning Statement Addendum confirms all the new homes would continue to meet the Nationally Described Space Standards, which is welcomed.

Light:

- 4.2 The revisions indicate 86% compliance of rooms meeting the Average Daylight Factor, however, in numbers, 244 rooms are not meeting the target. Sunlight is more concerning with only 62% compliance with BRE requirements. Whilst such outcomes are regrettable, these are only marginally lower than the original submission (85% and 66% respectively); and for the same reasons outlined in the Council's Planning Committee Report (orientation, achieving permeability to the river, minimising north facing units, optimising the efficiency of the site; provision of private balconies that limits light to windows below) on balance this is acceptable.

Aspect and outlook:

- 4.3 The number of single aspect and north facing units within Development Area 1 has increased from 5% to 6.8%. Whilst regrettable and previously a concern of both the Council and the GLA, on balance this does not sustain an objection, largely due to the outlook towards the river, and the overall masterplan layout which allows for north / south access to the river. Given the footprints of the blocks are largely unchanged to the January scheme, no further comments are made of the relationship of the proposed units with the neighbouring blocks within the development.

Development Area 2:

- 4.4 Whilst the spacing between buildings has predominately remained as originally submitted, Blocks 20 and 21 are now only 15.5m from the façade of Block 18 (previously 18m). By reason of this reduction and increased height, and the 1.5m footprint deviation allowance (as confirmed within the Design Code), the gap could be reduced to only 14m. Given this element of the development is only in outline, and the depth of the building could be reduced, this is deemed unfortunate and insufficient for the scale of these buildings to ensure suitable outlook and privacy.
- 4.5 The Design Code confirms the following, which are welcomed:
- All lighting throughout Development Area 2 must meet BRE guidelines
 - 75% of floor to ceiling heights will be 2.5m or more.
 - 90% of units within Development Area 2 will meet Building Regulations M4(2) accessible and adaptable units
 - 10% of units within Development Area 2 will meet Building Regulations M4(3) wheelchair user dwellings.
- 4.6 It is noted there are some contradictions within the Design Code, of which clarification is sought:
- Paragraph 3.4.5 states 2.6m must be provided floor to ceiling. However, paragraphs 5.1; 5.2.2 and 5.3.1 state only 2.5m must be provided floor to ceiling for 75% of the floorspace.

5.0 External living standards:

Amenity space (private):

- 5.1 The majority of units within the detailed element benefit from private amenity space, with variances relating mainly to the Maltings Building where heritage constraints limit the ability to provide private balconies. The Council's Planning Committee Report generally considered the approach acceptable, and this remains the case. The Council does seek clarification regarding the provision of private playspace as part of Development Area 2, given the reference to the provision of 5m per 1 and 2 person units (increasing by 1m² per extra occupant) has been omitted from the Design Code.

Amenity space (communal)

- 5.2 A consequence of the revised scheme is an increase in the number of 'amenity areas' not meeting the BRE overshadowing targets, rising from 6 to 9. Whilst this is undesirable and regrettable, for the same reasons outlined in the Council's Planning Committee report, namely the limited number of spaces involved; alternative amenity provision on site, and the orientation of the development to ensure access to the river, this does not constitute a formal objection

6.0 Play Space / communal space and impact on parks:

Playspace:

- 6.1 No objection was raised to the January scheme given the required quantity, as per the GLA play space calculator, was met for all age groups without the school provision; and was deemed either dedicated and genuinely playable or could be detailed and secured through conditions and legal agreement. However, the expansion of the scheme has raised a number of concerns and objections, which support the view the Revised scheme is now tilted towards 'overdevelopment':
- i. The open areas within the site can physically absorb the increased playspace requirements, however, there will be knock-on effects on open space for other uses, landscaping and access routes through the development.
 - ii. Much of the increase in playspace has been achieved by expanding play areas into land designated as landscaped areas or, to a smaller extent, paved areas within access routes. This can be acceptable if the design is appropriate and the areas are genuinely playable. However, given the scale of the change the Council deem it necessary for more details to be provided at this stage or there is a high risk that the effective playspace provided will be well below that required. In particular, how will the overlap between landscaping and playspace be achieved?
 - iii. The play design has a very natural focus with little traditional equipment apparent. Allied to the peripheral location of the pocket park, the Council expects that there will be significant overspill onto Mortlake Green for traditional and more adventurous play even if all the playspace required is provided within the development. The Green is already at capacity for play. The previously agreed Heads of Terms for play and informal sport on the Green need to be revisited if the increase in child yield remains as proposed. This can be followed up in legal meetings.
 - iv. The Council has also identified a series of locations where the playspace intrudes into areas that may not be suitable for playspace, and land use may need to change to be compatible with play or relocated elsewhere:

- east of block 17 is the one place where playspace overlapped with “mixed perennial and evergreen planting” landscaping in the previous revision – this has been enlarged further.
- in the area between blocks 18 and 19, the increase in playspace has been achieved by extending into the landscaped margins.
- north of block 18, the playspace includes the cycle shelter. The Council raises questions of the suitability of the playspace as indicated in the Design Code, and seek clarification as to how quality playspace can be delivered in such a building – paragraph 4.3.1, “*play equipment can be also provided adjacent or integrated with the cycle store to more activate the use of the building*”.
- between blocks 2 and 3, the expansion has been achieved by including landscaped areas. This may be appropriate where the steppingstone features are but not for the entire planted area.
- between blocks 7 and 8, the expansion includes landscaped areas and access paths.
- between blocks 8 and 11, new areas have been created incorporating mainly landscaped areas and paved sections of the access routes / square. No play features are illustrated. How will these be genuinely playable or of sufficient interest?

Impact on public parks and open space

- 6.2 The January scheme incorporated a financial contribution of £103,200 and £42,144 to mitigate the impact of the increased use and pressure on Mortlake Green, including necessary path widening and landscaping works, and improvements to play and sports facilities. The Green will continue to be primary access route for many new residents’ daily journeys to and from the development, and the 69% increase in the number of new residents will have greater impacts on the Green and its management. As such, an uplift to the previously agreed financial contributions is necessary, including:
- An additional £62,811 for the provision of an additional secure route through the Green to be widened or re-routed to take account of likely new desire lines.
 - A further £16,575 to provide an additional 75m² play provision due to increased demand and population yield.
 - £25,000 pa for 5 years (£125,000), for the necessary uplift in cleansing and maintenance of infrastructure and landscape to cater for the increase in population.

- 6.3 The Council thereby requests £307,586 is secured within any Heads of Terms to mitigate the impact on the development on the Green. This can be discussed in future legal meetings.

Playing pitch contribution

- 6.4 With the child yield increasing by 137%, it is necessary for the Playing Pitch Strategy contribution to increase. The area has a shortfall in grass pitches and the nearest sites – North Sheen and Palewell Park – are over capacity. The £18,000 previously agreed in the January scheme was the equivalent of three pitches to receive intensive maintenance for two years. Given the uplift in population, the necessary contribution is £30,000 to provide intensive maintenance to five pitches for two years.

Community / Public Park

- 6.5 The Revised scheme retains the community park in the southwest corner of the site, adjacent to Lower Richmond Road and Mortlake High Street. To ensure the delivery of such and the complexities around phasing, the Council previously secured the following Heads of Terms:
- Option A: Delivery of the community park by the Stag Brewery developer (specification to be agreed by LBRuT) and subsequent transfer of the community

park to LBRuT and a financial contribution to LBRuT of £147,700 for 10-year maintenance; OR

- Option B: Transfer of the community park land to LBRuT and a financial contribution of £886,000 for its delivery and maintenance.

6.6 In response to the uplift in population yield and necessary play space / equipment provision (660m²) and maintenance, the Revised scheme results in an additional financial contribution for both options, of which the Council request the GLA secure in any decision:

- Option A: Additional £52,380 – new total, £200,080
- Option B: Additional £183,400 – new total, £1,069,400

Towpath:

6.7 In addition to the above, the Council requests the financial contribution (£44,265) for the towpath works, as previously agreed to be secured again. Rational for such is outlined in the Council's Planning Committee Report.

7.0 Public realm (other matters):

Wind:

7.1 The Design Code previously identified where potential mitigation was necessary to avoid unacceptable wind tunnels. Such reference has now been removed, and given the increased heights, this is a concerning omission. Thereby, the Council requests that the GLA seek clarification from the applicant.

Gated development:

7.2 Whilst the Council acknowledges the private amenity areas and private terraced areas may be gated, the Council requests a condition be secured that prevent gates or other forms of physical barriers being installed to any communal courtyard or other public open space.

On-street parking within Development Area 2

7.3 The Design Code introduces a new sentence within section 4.2, "*The School access street should be a minimum of 10.5m wide. To include a 5m wide carriageway (minimum) and 1.2m wide footpaths on both sides of the road. Any remaining space should be utilised for either a planted verge or on-street parking for the school*". The prospect of on-street parking will compromise the quality of the public realm and encourage non-sustainable forms of travel. The Council thereby requests this is removed, and appropriate controls be incorporated to prevent on-street parking within the development area.

8.0 Residential Amenity

Visual impact and privacy.

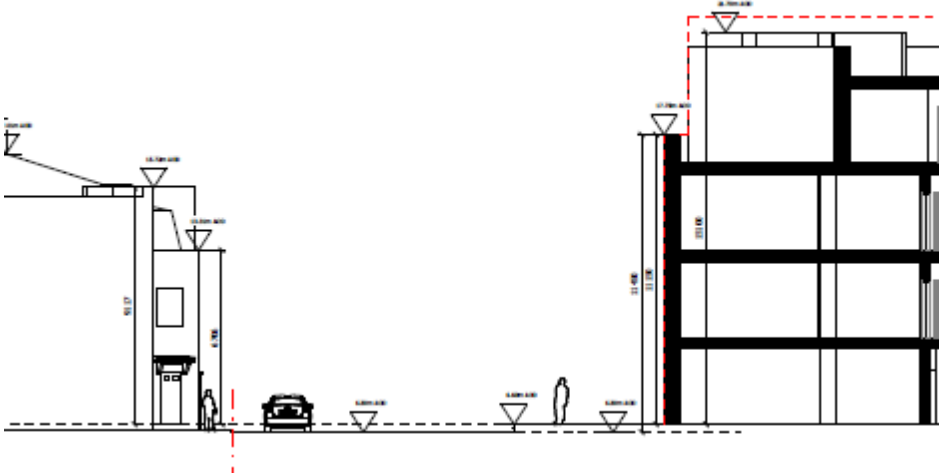
8.1 The principal sensitive receptors surrounding the site and impacted by the development are those residing in:

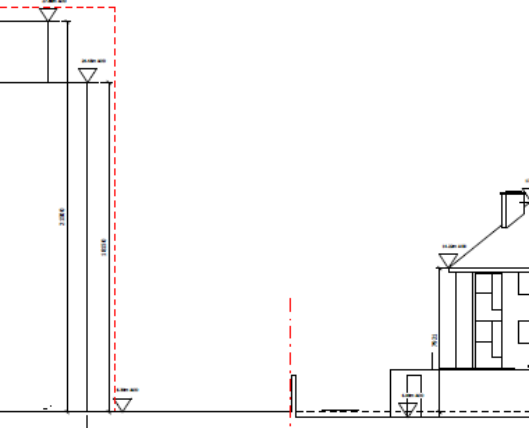
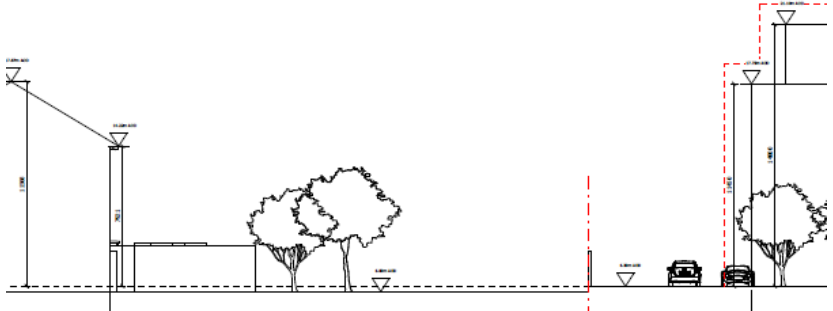
- Williams Lane to the west of Development Area 2
- Thames Bank to the north of Development Area 2
- Boat Race House to the east of Development Area 1
- Lower Mortlake Road to the south of Development Area 1
- Lower Richmond Road to the south of Development Area 2



8.2 Table 6 summarises the proposed relationships with the neighbouring residential properties.

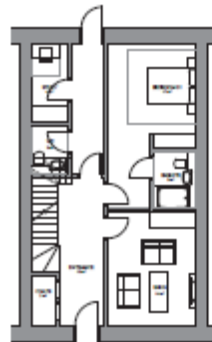
Table 8: The proposed relationship with neighbouring properties

Properties within the following road	Comments
Williams Lane	<p>Properties within Williams Lane are 2-4 storeys. Building 19 is proposed to be 4 storeys, with 3 storeys adjacent to the highway, as shown within the parameter plans 006 'block heights and vertical lines of deviation – page 16 of the Design Code'. Whilst acceptable, this does not correspond to the height and levels plan SQP-ZZ-SK-036 (see below) which permits the 4-storey height immediately behind the front parapet (red dotted line). The Council requests this is corrected so the drawing below corresponds with the block height plan, and the front elevation does not exceed 11.15m rising up to 15.1m where set back.</p> 

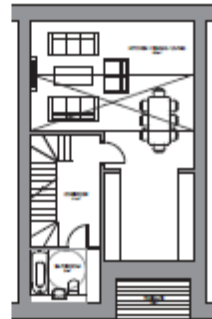
	<p>Buildings 18 and 20 are sited immediately to the rear of Reid Court, a flatted development on the east side of Williams Lane.</p> <ul style="list-style-type: none"> • Building 18 is 21m to the rear of Reid Court. The building previously in this location was 4 storeys, with a maximum height of 14.7m at parapet, increasing to 16m above datum 2.5m off the front elevation. This has now increased to 6 storeys with a height of 22m. As clearly illustrated in the extract below, such scale and height will appear an unacceptably intrusive and overbearing development to these occupants, to the detriment of their amenities.  <ul style="list-style-type: none"> • Whilst building 20 is 4 storeys, by reason of the separating distances and the shared use of the area to the rear of Reid Court, no objections are raised, provided the heights and setbacks as outlined in the parameter plan are secured as maximums - 11.45m at parapet, increasing to 14.8m set back from façade. (refer to below). 
<p>Thames Bank</p>	<p>The adopted PB suggests a maximum of 3 storeys for the northern part of Development Area 2.</p> <ul style="list-style-type: none"> • Parliament Mews: Previously the scheme was restricted to 3 storeys and 10.5m on rear parapet (from block datum). Block 20 is 4 storeys (16m from block datum) and maintains a gap of only 11m and 18.5m from the rear façade to the site boundary and their rear elevation. This unsympathetic increase is deemed an unneighbourly relationship, causing visual intrusion and loss of privacy. • Leyden House, The Old Stables and Thames Bank House: Whilst Block 21 maintains an acceptable gap between these buildings (26-32m), by reason of its additional storey now proposed (four) within 8-10m of these gardens, and the Design Code omitting the reduction to 2 storeys adjacent to neighbouring boundaries, and the consequential massing and level of overlooking, this is deemed unneighbourly.

- Thames Bank House and Aynescombe Cottage: The Council's Planning Committee Report recognised Building 21 (now building 22) of the January scheme had an unfortunate relationship with these properties, however, the Design Code sought to address such through the reduction in height to 2 storeys adjacent to the boundary. The scheme now proposes 4 storeys up to 16m above datum with no mitigation secured within the Design Code. The height within such close proximity to these properties' gardens (and in some instances houses) represents an unneighbourly form of development.

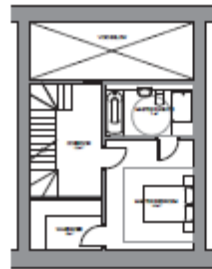
Officers note that pages 48 and 50 of the Design Code indicate illustrative sections / floor areas, with the upper floors (2nd and 3rd) set back from the rear façade to lessen the impact. The Council requests these are secured as a 'must' within the Design Code.



Illustrative Ground floor level plan



Illustrative First floor level plan



Illustrative Second floor level plan



Illustrative Third floor level plan

Boatrace House	<p>The January scheme proposed Building 9 to be 4-5 storeys (with the 5th storey set back) adjacent to Boatrace House. It appears from the elevations, floor plans and views, this remain the same. However, the Design and Access Statement indicates 5 storeys. Clarification is sought.</p> <p>If the building is proposed to be 5 storeys, whilst this increases the visual impact of the development, given the building height is not increasing overall, this being within the parameters of the Planning brief, the layout of Boat Race House and the separation by a shared alley, no objection is raised.</p>
Lower Mortlake Road	<p>The amended scheme generally increases the height of buildings fronting onto Lower Mortlake Road by 1 floor, to now a total of 3 – 6 storeys. Given the existing scale of the streetscape opposite, design, separating distances, and these being consistent with the PB, no objection is raised.</p>
Lower Richmond Road	<p>Whilst the amended scheme proposes to increase the height of the cinema building by 1 floor, and Building 14 by 1 floor; given the massing of the existing buildings on site; Building 13 remaining the same height; the cinema maintaining its recessed building line, separating distances and nature of windows at the Jolly Gardeners PH, no objection is raised.</p>

Sunlight, daylight and overshadowing:

- 8.3 A review of the Daylight, Sunlight and Overshadowing reports has been undertaken and a comparison to the January scheme.
- 8.4 Sunlight: The revised scheme increases the number of receptors not meeting target levels, including Parliament Mews (+4), Reid Court (+8), 31 Vineyard Path (+2); Aynescombe Cottage (+1) and Rann House (+2). Whilst this is clearly regrettable, by reason of the residual effect remaining insignificant, no objection is raised.
- 8.5 Daylight: A number of receptors have maintained the same degree of impact, however, more of a concern, and where an objection is introduced, is the number of surrounding receptors and new additional receptors, that have seen a worsening of impact and not meeting BRE guidelines:
- Long-term moderate to major adverse significance: Boat Race House
 - Long-term, local and of minor to moderate adverse significance: 31 Vineyard Path and Reid Court
 - Long-term, local and of minor adverse significance: Parliament Mews; Thames Bank House and Cottage; 3-9 Lower Richmond Road; and Old Stables.
- 8.6 Consequentially, the residual effect in terms of daylight has deteriorated to, *“insignificant to long-term, local, adverse and of minor to major significance impact”*. The cumulative and overall impact of these results are clearly a symptom of the overdevelopment of the Revised scheme, borne through the increased massing and height of the buildings, which is contrary to policy D9 of the ItP London Plan, *“where the edges of the site are adjacent to buildings of significantly lower height.....there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy”* and policy D6 (D) of the ItP London Plan which states that *“the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context”*.

- 8.7 Table 9 summarises the conclusions of the likely residual effects in relation to daylight and sunlight for the residential receptors in the vicinity of the site:

Table 9: Residential effects in relation to daylight and sunlight

	Original scheme	Revised scheme
Daylight	insignificant to long-term, local, adverse and of minor and to moderate significance.	insignificant to long-term, local, adverse and of minor to major significance.
Sunlight	insignificant	insignificant to long-term, local, minor adverse significance

Overshadowing amenity areas:

- 8.8 The sunlight amenity assessment identifies all amenity areas surrounding the Site would experience direct sunlight across more than 50% of their area for 2 hours or more on the 21st of March; or see a reduction of less than 20% from the existing level. As such, the effect of the scheme on surrounding amenity areas is considered to be insignificant and no objection is raised.

9.0 Transport (Applications A & B)

Car parking:

- 9.1 The scheme proposes a reduction in size and capacity of the car park within Development Area 2, as summarised in Table 10 below:

Table 10: Parking provision

	January scheme		Revised scheme	
	Residential spaces	Non-residential spaces	Residential spaces	Non-residential spaces
Eastern car park	331	77	330	78
Western car park	148	108	70	
Total	664		478	

- 9.2 No objections are raised to the reduction in on-site car parking, subject to measures (CPZ review and implementation and car club) being secured as part of the Section 106 to ensure no unacceptable impact on the existing highway network. The Transport Assessment (TA) Addendum suggests the Travel Plan reviews will be used to trigger any monies towards a CPZ review and potential implementation (9.6.5). For clarity, whilst the Council does not object to the lower parking provision, given the parking stress in the locality and low parking ratio (0.33), this must be on the basis that appropriate mitigation is secured and implemented prior to occupation, and future residential and commercial occupiers are precluded from car parking permit eligibility.
- 9.3 The scheme proposes 10% disabled parking provision for non-residential uses, and 3% for residential. The Council requests a condition be imposed to secure the remaining 7%, and details how this will be triggered.
- 9.4 The Council requests measures are secured to prevent on-street parking within the development (as indicated in the Design and Access Statement) to ensure an attractive public realm and to encourage active travel.

- 9.5 The illustrative highway layout (drawing 38262/5514/026) of the TA Addendum shows the relocation of informal parking along Williams Lane, to new inset bays in front of Building 19. No objection is raised, subject to appropriate Heads of Terms within the Section 106 concerning triggers and implementation for such works.
- 9.6 With respect to Electric Vehicle Charging Points, the submission confirms 20% active provision and the remaining 80% will be passive, which is welcomed.

Trip generation

- 9.7 Table 5.1 of the TA Addendum (extract below) predicts the revised development would generate:

Person trips:

- 2,559 two-way trips in the morning peak hour, compared with 2,391 in the January scheme.
- 2,081 two-way person trips in the afternoon peak, compared with 1,862 in the January scheme.

Vehicular trips:

- 326 vehicle trips in the morning peak hour, a reduction from 374 trips
- 225 vehicle trips in the afternoon peak hour, a reduction from 232 trips.

Table 5-1 Total Peak Hour Trip Generation (8% Vehicle Mode Share for School)

Mode	Original Scheme Application						Revised Scheme Application					
	AM Peak 08:00 – 09:00			PM Peak 17:00 – 18:00			AM Peak 08:00 – 09:00			PM Peak 17:00 – 18:00		
	Arr	Dep	2-way	Arr	Dep	2-way	Arr	Dep	2-way	Arr	Dep	2-way
Vehicle	188	186	374	113	120	232	153	174	326	108	117	225
Walk	609	313	923	445	443	888	585	378	963	477	465	942
Cycle	38	21	59	26	27	52	39	29	69	28	32	59
Bus	573	114	687	106	154	261	539	150	689	118	164	282
Train	140	83	222	138	166	304	168	121	289	164	210	374
Underground	10	45	54	28	16	44	27	88	116	58	36	95
Other	37	35	71	36	43	79	54	53	107	48	57	105
Total	1596	796	2391	893	969	1862	1564	994	2559	1001	1079	2081

- 9.8 This reduction in vehicle trips is predicted to arise from a reduction in residents' car parking and lower trip generation for the school than previously predicted.
- 9.9 As part of predicting mode splits for the original scheme, consideration was given to 3 schools in the borough. Following the Planning Committee, the trip generation figures were reconsidered in consultation with TfL, and the mode data for 1 school has been removed, and consideration given to Grey Court School, where 6.2% pupils travel by car, and Christ's School, where 10.1% travel by car. The TA Addendum sets out that a 8% vehicle mode share being applied to the school has been agreed given the % for car travel at Grey Court and Christ's schools; Aspirations Academies Trust (the potential operator of the school) having experience operating zero-car travel plan; and a Travel Plan being agreed as part of the Section 106.

- 9.6 Table 13 of the Technical Note within the TA Addendum sets out the mode splits for the school (extract below). The total revised person trips appear questionable, with the school only generating 985 total arrivals between 8am and 9am, of which 81 would be by vehicle. For a school of 1,260 pupils and 60 staff, 985 arrivals during the peak hour implies an implausibly high level of absence or arrival at another time. It is further noted that the 985 trips to the school would not all be one-way as they include parents and other short stay visitors who subsequently depart the school. The Council thereby requests:
- The GLA robustly test the trip generation methodology
 - Confirm whether the school proposes staggered start times as an explanation for the low total person trips

Table 13: School Peak Hour Trip Generation – 8.0% Vehicle Mode Share

Mode	Current Application						Proposed Enlarged Application					
	AM Peak 08:00 – 09:00			PM Peak 17:00 – 18:00			AM Peak 08:00 – 09:00			PM Peak 17:00 – 18:00		
	Arr	Dep	2-way	Arr	Dep	2-way	Arr	Dep	2-way	Arr	Dep	2-way
Vehicle	105	85	191	12	27	39	81	71	152	9	14	23
Walk	372	30	402	16	48	64	333	30	362	8	38	46
Cycle	23	2	25	1	3	4	21	2	23	1	2	3
Bus	523	43	566	22	67	90	468	42	510	11	53	65
Train	70	6	75	3	9	12	62	6	68	2	7	9
Underground	0	0	0	0	0	0	0	1	2	0	1	2
Other	15	1	16	1	2	3	21	2	23	1	2	3
Total	1108	167	1275	55	156	211	985	152	1139	31	118	150

Impacts on public transport:

- 9.8 The TA Addendum predicts that the main change in trips and mode share would be an increase in public transport use, with an anticipated 50% of the increased trips undertaken by Public Transport.
- 9.9 In terms of rail, the TA confirms the increase in rail trips can be accommodated by the increase in capacity of trains, from 8 to 10 carriages. Further, assessments have been undertaken on the platforms, staircases and footbridge of Mortlake Station, and it has been concluded there is sufficient capacity for the revised scheme. The Council thereby raises no further comment on this.
- 9.10 With respect to buses and the potential impact, the applicants have considered improvements to the following services:
- Diversion of the 209-bus service, however, this would require the provision of a replacement bus turn facility within the Site;
 - Upgrading the frequency of the 419-bus service (Hammersmith to Richmond);
 - Diverting or extending one of a number of other services to the Site that currently terminate in the Richmond area. Again, this would require the provision of a bus turnaround facility on the Site.
- 9.11 In response to the uncertainties relating to the repair works at Hammersmith Bridge, the TA confirms TfL are not yet in a position to advise on their preferred strategy to meet the future requirements of the masterplan, although, increasing the frequency of the 419 bus service, together with the provision of special school bus services as

required once the school’s catchment has been determined, would meet the needs of the development proposals. Notwithstanding, TfL have not committed to any improvements for bus services and instead sought a contribution from the development through a s106 contribution.

9.12 A financial contribution to cater for the uplift in bus services is welcomed. However, no details of the amount are provided within the TA, nor the proportionate split between applications A and B, delivery and triggers. It is noted the Financial Viability report estimates the same bus contribution as the original scheme (£3.65m). Given the predicted uplift in public transport travel, this is questionable, and the development should make the necessary uplift in contribution to cater for the needs of the development. The Council respectfully requests the GLA and TfL consider this.

9.13 For clarity, the bus turnaround does not form part of this application, and is not necessary to meet the bus transport needs of the development (thereby should not be secured as part of the S106 given this would not meet the tests set out in the NPPF and NPPG). The submission documents purely illustrate the feasibility of this if the Council ever wished to pursue this in the future. This would require a separate planning consent.

Impacts on the highway network:

9.17 The highway works to Chalkers Corner, incorporating Chertsey Court (Application C) were originally proposed to mitigate the impact of the developments on the Stag Brewery site (Applications A and B). The Council’s Planning Committee resolved to refuse Application C on the grounds that the adverse impacts could be adequately mitigated by financial contributions towards alternative traffic management and highway improvements, sustainable travel, parking restrictions and phased opening of the school; and thereby the application represented an inappropriate and unnecessary form of development where any benefits were outweighed by harm, particularly to trees, the Other Open Land of Townscape Importance, residential amenity, and air quality.

9.18 Whilst Application C remains a live application and an available option for the GLA, the revised submission details four alternative options (as summarised in Table 11) to mitigate the impacts of Applications A and B on the surrounding highway network. Options 1-4 all within the existing highway boundaries and if agreed would not, in themselves, require planning consent. Option 5 is Application C.

Table 11: Proposed options

Option	Details
1	<p><u>LBR Financial Contribution Scheme:</u> A transport contribution for a package of measures to mitigate the impact of the development on the highway network. This is as proposed by the Council following the refusal of Application C at the Planning Committee:</p> <ul style="list-style-type: none"> Area Wide Traffic Management Contribution – to enable a wider more holistic review of the area considering factors such as (but not limited to) measures to support safe and convenient access by foot, bicycle and bus; traffic signal and junction improvements; improvements to access to Mortlake Station and Barnes Bridge Station, signage and wayfinding; bus stop infrastructure and public transport information; environmental improvements and greening; cycling parking and traffic enforcement, including camera deployment.

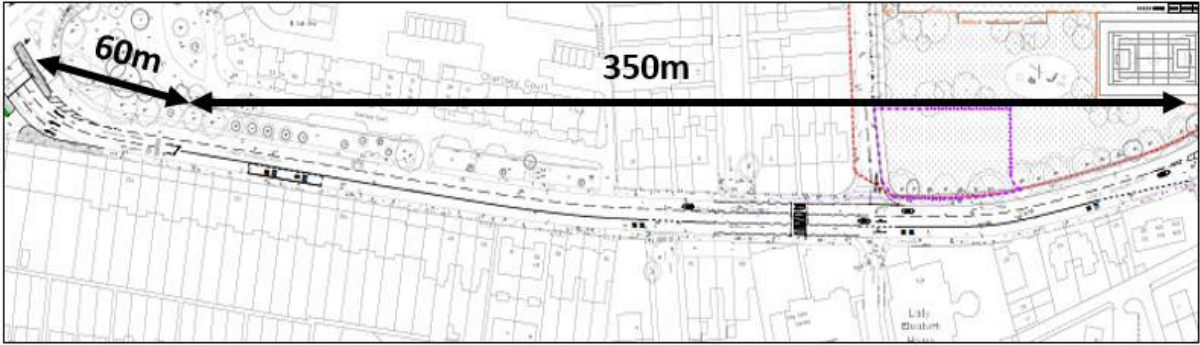
- Highway Improvements Contribution - funding towards improvements along Lower Richmond Road, Mortlake High Street and Sheen Lane.
- Chalkers Corner Junction Contribution - to enable improvements to the junction within the existing highway boundary, which could include improvements to traffic signal phasing and improvements to the junction to encourage sustainable travel, such as improved facilities for pedestrians, cyclists and bus passengers.
- Travel Plan and Travel Plan Bond - for the Council to monitor, enforce and provide measures to encourage sustainable travel.

2 **Chalkers Corner 'Light':**
 This option avoids land take from Chertsey Court and the consequential loss of 'Other Open Land of Townscape Importance' and is within the adopted highway land. The works include:

- Provision for a left turn flare lane from Lower Richmond Road (by removing part of the informal parking area at Chalkers Corner, on the southern side of Lower Richmond Road).
- Relocation of stop lines on A205 closer to the junction.
- Introduction of advanced stop lanes on Mortlake Road and Clifford Avenue South.
- Widening of area between junctions by relocating stop line by 2m.
- Removal of one tree and replacing with two trees.

The application suggests the left turn lane will provide benefits to buses and general traffic travelling westbound along Lower Richmond Road by allowing vehicles to pass queuing traffic travelling north towards the A205 through the junction and will thereby increases the number of vehicles than can pass through the junction before being blocked, which will be a positive for the junction.

3 **Lower Richmond Road Bus Lane:**
 The option proposes an indicative 350m westbound bus lane along Lower Richmond Road, starting to the west of Rosemary Lane and extending up to a point approximately 60m from the stop line at Chalkers Corner. This option results in the loss of approximately 36 parking spaces (during bus lane operational hours).

	
4	<p><u>Chalkers Corner 'Light' & Bus Lane:</u> Option 4 proposes a combination of the Option 2 (Chalkers Corner light) and Option 3 (Lower Richmond Road Bus Lane).</p>
5	<p><u>Chalkers Corner Scheme (Application C):</u> Whilst Application C was refused by the Planning Committee, this continues to remain a live application. This response reaffirms the Council's objection to application C, as outlined in Section 17 of this letter.</p>

9.19 The TA Addendum considers the options listed above, and initial modelling confirms the proposed options at Chalkers Corner will mitigate the development traffic and provide improvements for buses along Lower Richmond Road. (However, goes on to state, these options are still being investigated further as part of TfL VMAP process, which is running concurrently with the submitted application).

9.20 Following the Planning Committee, the GLA issued its Stage 2 Report, which commented on Option 1:

"Whilst these measures are included in the heads of terms in Richmond Council's draft S106 agreement, there is no further detail as to what these measures would entail or how and if they would mitigate the impact of the vehicle trips generated by the Stag Brewery development, or the subsequent impact on bus journey times. As such, it is not possible to determine at this stage whether the transport impacts of the proposed development would be adequately mitigated. This would require further consideration should the Mayor call in the application (paragraph 87)"

"Not all the transport issues raised at Stage 1, have been adequately addressed, in particular those regarding impacts to the bus journey times. The scheme, with the omission of the Chalker's Corner proposals, and in the absence of alternative modelled highways mitigation measures, cannot currently be considered to be in accordance with the transport policies of the London Plan and these matters would be further considered should the Mayor call in the application. (Paragraph 90)"

9.21 Options 2-4 are all within highway land and therefore do not require planning permission. However:

- The works will require Council highway approval if pursued and an amendment to the Traffic Management Orders and that process needs to be carried out independent of planning consent.
- Such works could generate objections if pursued, given the loss of on-street parking (with no obvious alternative) and thereby there are no assurances.

- The Council is not confident that a bus lane along Lower Richmond Road would be supported given the potential impacts and the absence of any detail as to what buses TfL has planned for it.

9.22 Therefore, it is unclear how Options 2-4 in the revised scheme provide any greater assurances than Option 1, proposed and accepted by the Council as an alternative to the unacceptable Chalkers Corners scheme:

9.23 While the Chalkers Corner scheme (application C) is unacceptable to Richmond Council, it is still deemed a financial contribution towards wider highway improvements, transport planning initiatives to promote and support safe and sustainable travel (particularly walking and cycling in the absence of greater certainty regarding public transport improvements) and a lesser scheme at Chalkers Corner is required to mitigate the transport impact of the development (in line with the Council's Planning Committee resolution and revised Heads of Terms):

- Area wide Traffic Management Contribution: £1,953,000
- Highway Improvements Contribution: £950,000
- Chalkers Corner Junction Contribution: £1,650,000
- Travel Plans for both Applications A and B
- Travel Plan monitoring - £30,000
- Travel Plan implementation bond - £250,000
- Travel plan target bond to cover seven / eight years – £250,000
- Phased opening of the school
- Bus infrastructure and contribution - £3,675,000
- Controlled Parking Zone consultation and implementation -

9.24 The Council however disagrees with the applicants' opposition to provide a returnable travel plan bond. The scheme depends upon ambitious sustainable travel mode shares and low car trip rates. In the absence of any increase in proposed contributions towards rail or bus, success of the travel plans measures becomes more critical still. The Council would seek to ensure that adequate resources are provided to monitor and enforce the travel plans and deliver further transport and highway schemes if the travel plans do not meet their targets or obligations. It is noted that the residential travel plan has very ambitious targets for 12% car mode share, 10% cycling and 34% walking, compared with targets of 31%, 4% and 28% in the January scheme. There is no justification as to why a returnable travel plan bond is not accepted; the scheme simply has to deliver on what it promises and what underpins its assessment as being acceptable in planning terms.

Other highway works:

9.25 Clarity is sought regarding the further highway works that were secured in the January scheme for Lower Richmond Road, Mortlake High Street and Sheen Road. The TA Addendum states, with the contributions outlined in paragraph 9.23, there would be no additional Chalkers Corner or Lower Richmond Road highway proposals progressed as part of the planning application. However, this is later contradicted within paragraphs 9.7.14 and 9.7.16 of the TA, listing a package of mitigation works, which appears as previously secured. If those referenced paragraphs of the TA are inaccurate then the Council asks for confirmation as to the basis for the now revised assessment by TfL and the GLA that the works are no longer needed. For clarity, as part of the January scheme, the Council secured the following, which was deemed necessary to mitigate the impacts on the highway network and make the scheme acceptable in planning terms. Given the uplift in residential units, the necessity for these remain. The Council hereby requests these are secured within any forthcoming Section 106 / Section 278 highway agreement:

- Highway works as outlined in drawing 38262/5501/058H

- Bus infrastructure – Section 278
- TfL pedestrian improvement scheme on Lower Richmond Road, Mortlake Highway Street, Sheen Lane - £228,878.00

Cycle storage provision:

9.26 The Council supports the increase in cycle parking proposed throughout the whole site (Table 12). It is disappointing there is no increase in the proposed level of cycle parking for the school which could assist to encourage greater modal shift from the motor car and fit with both the Mayor and the Council’s promotion of Active Travel including School Streets. This would be an excellent opportunity to design this into the scheme rather than retrofit it later. It is noted that cycle parking standards set in T5 of the ItP London Plan are minimum standards.

Table 12: Cycle parking provision

	Long Stay	Short stay	Total
January scheme	1754	197	1951
Revised Scheme	2582	251	2833

9.27 The Council would thereby encourage greater cycle storage provision is secured prior to the Hearing, or the Travel Plan Heads of Terms secures greater provision if demand shows it is needed during the Travel Plan reviews/monitoring.

Travel Plan:

9.28 The Council is disappointed with the initial targets set within the School Travel Plan for students arriving by car. The TA Addendum states the school travel plan will be aiming to deliver a car free school. However, later states, “*While this is stated to be car free it is understood that this is not likely to be a realistic target therefore the STP is targeting 5% of students arriving by car*”. The Council would encourage the GLA to insist on more ambitious targets.

Level Crossing and Bridge:

9.29 The TA Addendum states that since the original application the following improvements to the Level Crossing have been agreed with Network Rail:

- Additional bridge signage;
- General improvements to the pedestrian bridge;
- Moving bollards back on both North and South Worple Way;
- Setting back vehicle stop lines.

Such works, in addition to improved surfacing of the road, were all agreed Heads of Terms when the Planning Committee heard the applications in January. Whilst the applicant may have deemed these unnecessary, the Council took an opposing view, concluding these essential. The need to secure such works is endorsed again, especially given the uplift in active travel and person / cycle trips to the site. The works do not represent an improvement to the proposal which the Planning Committee considered.

Access Strategy:

9.30 No material change is proposed to pedestrian, cycling and vehicular routes and accesses to and from the site, and thereby no further comment.

Delivery and Servicing:

9.31 The revised scheme proposes the same strategy as the original scheme, and thereby no objections are raised.

Summary:

- 9.32 The development was determined to be acceptable in transport terms without Application C, subject to the Council's proposed alternative mitigation in the form of revised Heads of Terms (now referred to as Option 1). It is the Council's opinion Option 1 still remains the most appropriate mitigation for the scheme. It becomes ever more important in the light of the changes proposed in the revised scheme which adds further to the scale of development and increases the trips generated which lends substantial weight to penalties/returnable bonds within the Travel Plan to ensure the scheme achieves what it has been assessed as being capable of delivering..

10.0 Energy

- 10.1 The sustainability and energy credentials of the January scheme were accepted by the Council, subject to contributions towards carbon off-set contributions and conditions as outlined in the Planning Committee report:

- Contribution: £1,411,809
- Application A:
 - NS12: GLA (Energy) – Site-wide Heat Network
 - NS13 GLA (Energy) – Carbon Dioxide Emissions Reduction
 - NS14: GLA (Energy) – Zero Carbon Technology Feasibility Report
- Application B – NS12: Energy Strategy

- 10.2 An addendum has been provided for the energy strategy, with Tables 13a and 13b detailing the carbon savings and necessary carbon offset contributions of the revised scheme.

Table 13a: Summary of CO2 emission savings

		Application A	Application A Dev. Area 1	Application A Dev. Area 2	Application B School
Be Lean		8.5%	8.3%	8.8%	1.4%
Be Clean		-----	-----	-----	-----
Be Green		28% - ASHP	3.8% - ASHP	63.1% - ASHP	57.7% - ASHP
Total		36.5% (724 tonnes / yr)	12.2% (143 tonnes / yr)	71.9%	59.1%
	Dwelling reduction	36.2% (718 tonnes / yr)	11.4% (134 tonnes / yr)	71.9% (579 tonnes / yr)	
	Non dwelling reduction	0.3% (7 tonnes / yr)	0.8% (9 tonnes / yr)	-----	59.1% (79 tonnes / yr)

Table 13b: Comparison in carbon savings and carbon offset payment

Carbon reduction savings against Part L2013 baseline			
	Whole Site (application A & B)	Application A	Application (school) B

				Development Area 1		Development Area 2			
		Domestic	Non-domestic	Domestic	Non-domestic	Domestic	Non-domestic	Domestic	Non-domestic
January scheme	Total	43.8%	40.6%	44.7%	34.3%	43.1%	44.5%	0%	29.8%
		42%		40.7%		43.7%		29.8%	
	Carbon offset payment	£1,411,809	£0	£773,234	£6,021	£634,476	£0	£0	£16,738
		£1,411,809		£779,255		£634,476		£16,738	
GLA Scheme	Total			11.2%	0.8%	71.9%	0%	0%	59.1%
				12.2%		71.9%		59.1%	
	Carbon offset payment			£1,260,000	£203,000	£408,600	£0	£0	£0
		£1,871,600		£1,463,000 (700 tonnes CO2 pa for residential 113 tonnes CO2 pa for non domestic)		£408,600 (28.1% shortfall 227 tonnes CO2 pa)		£0 (24.1% surplus +32 tonnes Co2 pa)	
GLA scheme	Total			11.2%	0.8%	71.9%	0%	0%	59.1%
				12.2%		71.9%		59.1%	
	Carbon offset payment			£1,260,000	£604,800	£408,600	£0	£0	£99,000
		£2,372,400		£1,864,800 (700 tonnes CO2 pa for residential 336 tonnes CO2 pa for non domestic)		£408,600 (28.1% shortfall 227 tonnes CO2 pa)		£99,000 (55 tonnes CO2 pa)	
GLA scheme	Total			11.2%	0.8%	71.9%	0%	0%	59.1%
				12.2%		71.9%		59.1%	
	Carbon offset payment			£1,995,000	£957,600	£646,950			£156,750
		£3,756,300		£2,952,600 (700 tonnes CO2 pa for residential 336 tonnes CO2 pa for non domestic)		£646,950 (28.1% shortfall 227 tonnes CO2 pa)		£156,750 (55 tonnes CO2 pa)	

for non residential					
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- 10.3 The scheme continues to seek the necessary water consumption savings and BREEAM exceeding credentials.
- 10.4 The Council thereby does not raise objections on energy grounds, subject to the following being secured on any decision:
- the aforementioned conditions
 - Revised Carbon Offset Payment (and safeguards in place for potential uplifts as summarised in Table 13b)
 - Heads of Terms to secure further Carbon Offset Payment if the above carbon savings are not met.
- 10.5 Whilst a sustainability report has been submitted, the Sustainable Construction Checklist was absent, therefore the Council ask the GLA to request such, in line with adopted policy LP22. In addition, the Council questions whether the necessary financial contribution for carbon offset for the residential and non-residential within Development Area 1 is correct, whereby this value should be higher than that outlined in the Stag Energy Addendum - the carbon offset tonnes and necessary payment within Table 5, 6 and 7 do not seem to equate to the necessary carbon dioxide emission savings (tonnes per year) within Table 2 of the said report. Therefore, the Council requests this be secured in line with policy and any relevant documents updated prior to the Hearing.

11.0 Pollution

Air pollution:

- 11.1 Although the Council has concerns over the impact of the development on Air Quality, it is deemed the harm and potential harm can be mitigated through suitability worded conditions and Heads of Terms concerning:
- Air Quality neutral – both Development Areas 1 and 2
 - Air Quality Construction Logistics Plan
 - Air Quality- Non-Road Mobile Machinery (NRMM)
 - Air Quality – Bonfires during construction
 - Air Quality – Emissions Control Scheme
 - Green Screening – School (2metres high along the school perimeter boundary on Lower Richmond Road from Williams Lane)
 - Green screening - Chalker's Corner
 - Air Quality – Ventilation system
 - Air Quality – Cycle, Car Club and EV Parking
 - Air Quality – Transport emissions
- 11.2 Air Quality measures - The Council has a duty from DEFRA and the Mayor to reduce NO₂ across the borough and to not permit an increase. Therefore, in response to the development being likely to result in an increase in background Nitrogen Dioxide compared to existing levels in the surrounding area and including a new school with sensitive receptors within 150m of the main road, a financial contribution of £90,000 is sought to deliver measures associated with tackling air quality in the borough including automated air quality monitoring:

- 3 years x air quality awareness raising programme for the school when it first opens to encourage modal shift – 3 x £6k = £18,000;
- 3 years x cycle training and/or behavioural change measures to improve air quality in and around the area - £4k pa x 3 = £12,000.
- For a development of this size the Council would need to monitor NO₂ and PM with robust air quality monitoring equipment. Each analyser costs approximately £20,000 in addition to the gas bottles and a unit to calibrate and house, which is £8,000-10,000. The unit needs fortnightly calibrations, daily data management and 6 monthly audits. This will cost at least £10,000-£12,000pa, thereby £60,000 is a conservative estimate for 1 year.

11.3 Resourcing for compliance and regulation: If a development of this size is approved, the Council will need to undertake ongoing Environmental Health Air Quality site visits / ongoing monitoring to check for dust and noise and community relations, which would involve the appointment of an employee on a short term contract. Therefore, £60,000 is requested to cover the costs of 1 part time contractor for 2 years. This will be assessed after the first two years and then annually.

Noise:

11.4 Having reviewed the additional detail, in general there have been no significant changes to affect the previous findings. As such the conclusions, conditions and heads of terms previously identified within Council's Planning Committee Report remain pertinent. However, in respect of the revised acoustic report, it is noted this now includes additional detail in respect of the proposed MUGA concluding, "*whilst not specifically required to reduce the noise impact of the sports pitch and MUGA, a commitment has been made to include the following mitigation measures... which will further reduce the noise impact:*

- *A weld mesh (twin bar super rebound fence) with EPDM rubber inserts and fixings to reduce rattle and ball impact noise during play;*
- *A maintenance scheme to prevent deterioration in performance of the sports facilities that could result from damaged panels, loose brackets, worn AV bushing and squeaky gates; and*
- *2.5m acoustic barrier along the western and northern boundary of the sports pitch"*

11.5 As such, the Council has no objection, subject to the conditions and heads of terms previously secured being reflected in any future decision, in addition to the above mitigation measures.

Contaminated Land:

11.6 No objection, subject to a condition securing a desk study, site investigation, remediation works and verification report.

12.0 Trees

12.1 The removal of an additional single street tree (part of G151) is proposed to necessitate S278 Highway Works. This tree belongs to the Council and therefore a Capital Asset Value for Amenity Trees (CAVAT) valuation should be undertaken by the applicant with the ensuing value used to inform of monies to be paid to the Council as compensation. This also applies to G147, T59 & 60 which were earmarked for removal in the January scheme.

- 12.2 Four trees (T3, 4, 19 & 20) within the northwest corner of the site will require minor pruning to address the relationship with adjacent buildings. This is insignificant and will have a negligible impact upon public visual amenity.
- 12.3 A highway option would require the removal of an additional tree T107, which the Council believes is under the ownership of Transport for London. This specimen is a semi-mature lime tree that has been categorised as B2; despite the B categorisation this tree is in its younger years and can be suitably replaced through appropriate landscaping.
- 12.4 The Council requests the tree protection, planting and management conditions outlined in the Council's Planning Committee report are carried forward in any positive recommendation.

13.0 Ecology:

- 13.1 The Council advises the majority of the surveys were carried out in 2018, therefore will be running very close to or over their validity dates and with respect to bats, 2 breeding seasons have passed. Best practice (BS 42020:2013) advises surveys will need to be updated in order to ensure an informed decision is made. For example, it may be that since the surveys were undertaken, a Brown Long eared bat maternity colony may have set up in building 4 in which case that could potentially constitute a reason for refusal. The GLA should satisfy itself that the relevant sections of the NPPF and development plan policy have been met.
- 13.2 The Council also recommends a Biodiversity Net Gain Assessment is undertaken and provided to understand the habitats that could be created. This would be in line with policy G6(d) of the New London Plan ItP, that aims to secure net biodiversity gain, informed by the best available ecological information.

14.0 Impact on local infrastructure:

Education

- 14.1 The revised unit mix and increase in units mean that the pupil yield arising from the development itself would significantly add to demand for school places. The revised numbers of units would, applying Achieving for Children's formula, produce a 'pupil yield' of:
- 225 primary-phase and
 - 112 secondary-phase children.
- 14.2 Applying the GLA Yield Calculator, the development would be forecast to produce
- 350 primary children and
 - 108 secondary (though it should be noted that the GLA calculator does not have an inbuilt dampener for any children who would already be attending Richmond schools, i.e. leading to no net need for state-funded school places in the area).
- 14.3 Whilst the additional demand for state-funded primary places should be manageable within existing capacity, the demand for state-funded secondary places will only be met on an ongoing basis by approval of the proposals for a new school, i.e. Livingstone Academy within Application B.

- 14.4 If Application B is approved, this would provide enough additional capacity to meet the forecast demand from families who would occupy the proposed development. However, if Application B is refused, then Achieving for Children are deeply concerned with the Council's ability to provide enough Year 7 places for families in the east of the borough, including those who would occupy the proposed Brewery site housing development.
- 14.5 Currently, the forecasts of need for additional Year 7 places in the east of the borough indicate a need for three forms of entry (120 places) by 2022, rising to five forms (150 places) from 2025 onwards. That level of need can only be met by the certainty of a new school opening within a reasonable distance and the Brewery site is the only one which has been identified as suitable. Bulge classes have been needed in each of the last two school years - at Richmond Park Academy (RPA) in 2018/2029 and Christ's in 2019/2020 - and will be needed again in 2020/201 (at RPA) and subsequent years until the new school opens. The development is therefore contingent on the provision of the new school, as required by D2 of the ItP London Plan. If the school is not approved and does subsequently not open, and Application A is approved, the availability of bulge classes, or additional permanent expansion of local schools, is forecast to be insufficient to meet demand for places. (Details are set out in the Council's School Place Planning Strategy, adopted in December 2019).
- Health:
- 14.6 Local Plan policy LP28 requires developments to assess the potential impacts on existing social and community infrastructure and where necessary, secure measures to mitigate the impacts of development on existing services. Similarly, D2 of the ItP London Plan recognises that "*where there is currently insufficient capacity of existing infrastructure to support proposed densities, boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time*".
- 14.7 The Environmental Statement submitted with the January application recognised mitigation in the form of developer contributions was needed to offset the potential pressures faced by existing NHS healthcare providers and that without mitigation there would be an adverse impact. Thereby, the January scheme secured a financial contribution of £465,850 towards investment in primary and community healthcare in the local area to mitigate the direct healthcare impact of the development.
- 14.8 The updated Environmental Statement (July 2020) also concludes that due to the existing pressures on the capacity of primary healthcare facilities, mitigation through a developer contribution may be required to off-set the additional demand arising from the development.
- 14.9 In September 2019, the two closest GP practices in Sheen Lane Health Centre confirmed that they do not have the capacity to absorb the additional demand, which will need reconfiguration of the current building and digital solutions to manage access for an increased number of patients, and thereby require capital investment. This situation has not changed.
- 14.10 The Council's adopted Planning Obligations SPD (June 2020) supports the use of the HUDU Planning Contributions Model to assess the impact of development on healthcare infrastructure and calculate developer contributions. The HUDU Planning Contributions Model has been applied, based on the revised housing mix, to calculate the demand for additional primary healthcare infrastructure arising from the development and the associated capital costs. The model calculates a revised Section 106 requirement of £595,660, to mitigate the impact of the development.

- 14.11 Therefore, and in line with policy D2 of the ItP London Plan, policy LP 28 of the Adopted Local Plan and Planning Obligations SPD, the Council requests the GLA secure £595,660 within the Section 106 to mitigate the impact on existing social infrastructure. In the absence of such, the development would have an unacceptable pressure and impact on health services.

15.0 Waste management

Development Area 1

15.1 Commercial waste:

- i. For the area of 'flexible use' a calculation of 10L/m² has been used which could be seen as a reasonable assumption.
- ii. The hotel, cinema and office waste arisings has been calculated in line with the Councils adopted SPD requirements.
- iii. The submission recognises that non-residential arisings are an estimate and that actual arisings will be determined by the incoming tenants. Therefore it is essential to secure details of commercial waste storage and disposal via condition, to ensure that suitable and sufficient space is provided for the commercial waste to be stored and collected contained in bins at a suitable collection frequency which does not negatively impact local traffic conditions or air quality (in this context sufficient storage space to enable weekly collections is highly desirable).

15.2 Residential waste:

- i. The total expected residential weekly waste arisings for Area 1 have been calculated in line with the Council's adopted 'Refuse and Recycling Storage SPD'. However, half of the required bin storage combined with twice weekly collection of all waste streams is proposed, which is contrary to the Council's SPD that states, "*Residential dwellings must have adequate storage capacity to allow for weekly collections of refuse and recyclable material.*" Notwithstanding such, given this was previously agreed with the applicant prior to submission, subject to heads of terms securing a financial contribution to cover the costs of a second collection, the Council had and continues to have no objection, subject to any Section 106 secured on this decision including a financial contribution of £775 per 1100 litre bin (both refuse and recycling) per year to cover the costs of the second collection, and future year charges being based on the Council's agreed charge for future years rather than being inflated separately from the 2020/21 base year charge. This will continue in perpetuity.
- ii. The collection strategy is for buildings 2, 3, 7, 8, 11 and 12 to have waste stored at basement level and for it to be brought to ground floor via goods lifts for collection. Detailing a contingency plan for bringing waste to ground floor level would be useful. If waste is not presented due to a lift breakdown then the Council will not be obliged to a) wait or b) return to collect that waste. It is recommended this is sought or secured via condition.
- iii. Collection by the Council will be from consolidated ground floor bin stores in blocks 3, 8 and 12 for those with underground storage and directly from ground floor bin stores at blocks 4, 5, 6, 9, 10 which do not have access to the basement. In all instances the bin stores being collected from must be freely accessible to our collectors at all times. This must be conditioned.
- iv. A basement masterplan is provided showing bin stores. However, it is not entirely clear which blocks these stores relate to as they are not annotated.

- v. The submission states that sufficient room for bulky waste storage is provided within each bin store. However, this is not apparent on the plans. If bulky waste and bin storage are to be combined there must be a clear delineation between the area for bins and the area for bulky items to prevent obstructions and maintain good access. In addition, another issue here is the practicality of internal management arrangements to control the deposit of bulky items for which a collection has not been booked and paid for. It may be possible to control this with CCTV however it would be likely to be significantly easier if the bulky waste area was caged off with controlled access (with access granted on receipt of proof of a collection having been booked and paid for).
- vi. It is noted that building 4 has two bin stores, one of which contains only 2 bins. In all instances a minimum of 3 bins are required to allow for collection of 3 waste streams (refuse, paper and card recycling and mixed container recycling). This need addressing.
- vii. Para 5.2.3. states that 23L of internal food waste storage will be provided in each flat in case a future food waste collection from blocks of 5 flats or more is implemented. Whilst the inclusion of internal food waste storage is welcomed, 23L would be potentially excessive and around 5 litres of internal food waste storage is usually more appropriate. Additionally, and perhaps more crucially, space should be provided in the bin stores for the provision of communal food waste recycling bins, should this service be provided to flats in the future. Ideally the waste strategy should outline what residents would do with the contents of their food waste caddies and where communal food waste containers would be sited to demonstrate that a workable solution has been identified in the event that a weekly food waste service for this development. is introduced.

Development Area 2:

- 15.3 Residential waste is proposed is proposed to be collected weekly, and Blocks 13, 67, 17 and 18 will have the same basement system as those in Area 1 and collected from a consolidated area at ground floor in building 16 and the remainder will be collected directly from ground floor stores in each block. The Council has the following comments:
- i. Where blocks have basement bin stores it is essential that additional storage space is provided for a minimum of 1 x 1100L refuse bin, 1 x 1100L paper/card recycling bin and 1 x 1100L mixed container recycling to remain in the bin store for use by residents, whilst the remainder are transported to ground floor level.
 - ii. Where waste is being presented by facilities management staff, it should be made available for collection by the Council before 6am on the scheduled collection day.
 - iii. All bin push routes should be smooth, hardstanding and free of slopes and steps. Dropped kerbs should be installed at all necessary points to facilitate bins being pushed from the stores to the vehicle.
 - iv. The waiting vehicle must not unduly obstruct local traffic.
 - v. Swept path analysis has been provided showing the electric bin tugs journey around the estate, however, swept paths for refuse collection vehicles are required – in particular, this should demonstrate:
 - a collection vehicle can travel around the development reaching within 20m of every bin store.
 - Collection vehicles must not be required to reverse more than 12m
 - suitable turning circles or hammerheads must be provided where required.
 - Any tracking should be generated using the vehicle dimension provided in the Council's adopted 'Refuse and Recycling Storage' SPD.

Circular Economy Statement:

15.4 With respect to the Circular Economy Statement, the Council has the following comments:

- Section 4.3 of the CES details “municipal waste during operation”. It confirms that there will be *“Sufficient storage for the segregation and storage of at least three waste streams (recycling, food and residual waste) in both individual units and communal bin stores will be provided to enable effective waste segregation and promote higher recycling and composting rates.”* However, this is based on twice weekly collections (without mentioning them) which have significant adverse implications for environmental performance in terms of collection related carbon emissions, local traffic congestion and air quality.
- The provision for separate storage of food waste would only be beneficial if and when the Council provides weekly food waste collections (which is likely by the time this development is fully occupied).
- The document states, *“The Facilities Management Team and LBRuT waste team will liaise to coordinate the refuse & recycling collection process and agree the collection days / times and process.”* However, the collection days for any collections provided by the Council are likely to be determined by the Council’s operational requirements including the need for efficient collection vehicle routing. Furthermore, the Council does not provide timed collections- These would occur on the specified day(s) after 6am. The Council’s collection “process” is also fixed rather than being something “to be agreed”. As such, the Facilities Management Team will need to move the appropriate bins from the storage area(s) on the Basement Level to the Refuse Stores located on the Ground Floor by 6am on collection days.
- The CES includes a table summarising the proposed refuse and recycling bin provision for each building. This confirms that proposals are based on twice weekly collections for both refuse and recycling. The proposed provision is adequate, based on twice weekly collections. Monies however should be secured within the Section 106 for perpetuity for the second waste collection. (As confirmed in the document, *“Development Area 2 will be collected once per week as agreed with LBRuT due to the proportion of affordable housing in this Development Area.”*)
- Regarding commercial waste the document states, *“Frequency of collection will be determined a ta (sic) a later date following discussions with the appointed waste collection contractors.”* Whilst this does not contravene SPD requirements it does risk further adverse implications for environmental performance in terms of collection related carbon emissions, local traffic congestion and air quality.
- No details have been providing detailing or confirming there is adequate space to present all refuse and recycling bins plus bulky waste (e.g. sofa + arm chair) to the collection points whilst maintaining unobstructed access to each stream. For future proofing, this space should also be sufficient to accommodate food waste bins.
- Additional bins will be required for each basement store to enable occupants to continue to deposit waste in them on collection days which could be stored at the ground level collection points on other days.

16.0 Application B: New Secondary School on the former Stag Brewery site (LBR ref: 18/0548/FUL):

16.1 The Council and the Planning Committee were supportive of Application B, and this remains with the Revised scheme. The Council respectfully requests the GLA refer to the Council’s Planning Committee Report (Appendix 1) for the reasoning behind the recommendation for approval. This response focuses on just the proposed revisions.

- 16.2 The following design amendments have been made to Application B, as illustrated in the drawing below:
1. Widening at the road junction between Lower Richmond Road and Williams Lane
 2. Improved clearance space at Lower Richmond Road pedestrian crossing toward the school.
 3. Improved space for pedestrians around the school and bus drop off.
 4. Improved widths to secondary road and pedestrian layout between the school and Block 18
 5. Removing the school access directly from Lower Richmond Road onto the new road adjacent to the school (eastern side), to prevent large numbers of students congregating on Lower Richmond Road close to the pedestrian crossing.



- 16.3 The revisions are minor and include modest amendments to the road and pedestrian layouts at the pedestrian crossing, around the school and bus drop-off, and between the school and Block 18.

- Design: From a design perspective, no objections are raised.
- Landscaping / Trees: The number of trees to be removed have been revised from 18 to 12. This is in due to 6 of the trees being removed in line with a Tree Works

Application 19/T0404/TPO (T55, 57, 76, 82, 84 & 85). This decision carried replacement tree planting conditions that have yet to be complied with. The Council advises this could reasonably be sought through the landscaping process of any approved application.

- Highways: Refer section 9.0 of this response.
- Waste: Prior to a decision being made, it is requested the following details are provided to ensure there is sufficient refuse and recycling storage facilities and suitable service arrangements:
 - Detailed swept path drawings to demonstrate the refuse collection vehicles, with the dimensions set out in the Council's Refuse and Recycling SPD, can safely manoeuvre around the site.
 - Details of management arrangements for the shared use of the bus / servicing drop off area. Whilst these spaces are adjacent to the external bin store / recycling area, there is concern over the potential conflict of these parking areas (i.e. a parked refuse vehicle obstructing the use by buses and vice versa). Refuse collectors would not necessarily be obliged to return should they initially not be able to stop safely.
 - A detailed drawing showing the arrangement of sufficient bins to cater for the development.
 - The report states that total expected weekly waste arisings are to be 15,240L (12.7L x 1,200 pupils) and have proposed 7 x 1100L refuse bins and 7 x 1100L mixed recycling bins. Whilst the school is not obliged to use the Council services and could utilise any commercial waste operator (as is proposed) it is recommended the refuse and recycling storage facilities adjusted to be in line with then Council's collection services for separate refuse and the recycling of paper & card and mixed containers. It is recommended the scheme is amended to increase capacity by 20% and provide space for:
 - 9 x 1100L refuse bins,
 - 4 x 1100L paper and card and
 - 4 x 1100L mixed containers recycling bins.
 If the applicant is not able to provide space to facilitate this, then a twice weekly collection of refuse would be acceptable.

16.4 The conditions deemed necessary for this development are outlined in full within the Council's Planning Committee Report (Appendix 1). It is hereby requested these are carried forward in full when a decision is made. The Council would object to the removal of any.

17.0 Application C: Highway works to Chalkers Corner / Chertsey Court (LBR ref: 18/0549/FUL):

17.1 Application C remains a live application and an available option for the GLA, however, no changes are proposed to the physical works as outlined in the January scheme.

17.2 Whilst the Planning Committee Report recommended approval of Application C, this was overturned by the Council's Planning Committee, and subsequently refused on a number of grounds, as set out in paragraph 1.2 of this response.

- 17.3 Therefore, if the GLA did decide to pursue Application C to mitigate the highway impacts arising from Applications A and B, the Council formally objects on the same grounds as outlined in paragraph 1.2 and as summarised below:

The adverse impacts to the highway network caused by the redevelopment can be adequately mitigated by securing the following heads of terms in Applications A and B (refer to Appendix 1 – Heads of Terms – Section 106 Legal Agreement for full details:

- Area wide Traffic Management Contribution: 1,953,000
- Highway Improvements Contribution: £950,000
- Chalkers Corner Junction Contribution: £1,650,000
- *Travel Plans for both Applications A and B*
- *Travel Plan monitoring - £30,000*
- *Travel Plan implementation bond - £250,000*
- Travel plan target bond to cover seven / eight years – £250,000
- *Phased opening of the school*
- *Bus infrastructure and contribution - £3,675,000*
- *Controlled Parking Zone consultation and implementation - £130,000*

The development is thereby an inappropriate and unnecessary form of development where any benefits that the scheme may deliver is outweighed by harm:

a) *Trees:*

- a. *loss of highly prominent trees of townscape and amenity value;*
- b. *inadequacy of the proposed planting;*
- c. *CAVAT contribution not deemed to sufficiently mitigate the harm caused by the loss of the existing trees.*

b) *Other Open Land of Townscape Importance and Unneighbourly:*

- a. *loss of Other Open Land of Townscape Importance;*
- b. *unacceptable and unneighbourly form of development;*
- c. *harm to the green openness and character of both the grounds within Chertsey Court and the kerb side adjacent;*
- d. *detrimental to the visual amenities of surrounding residents, streetscene and area in general.*

c) *Air Quality:*

- a. *Creation of a poor walking environment and increase the risk of exposure to poor air quality in an Air Quality Management Area and Air Quality Focus Area.*

- 17.4 If the GLA did decide to approve Application C, it is requested that all conditions and relevant Heads of Terms, as outlined in the Council's Planning Committee Report, addendum, minutes and revised heads of terms document, are secured on any decision.

18.0 Summary

Application A:

- 18.1 The Council acknowledges the priorities of the Mayor and Greater London Authority in pursuing development outcomes for the benefit of Greater London Region, with respect to housing delivery. The Council has positive evidence of a five-year housing land supply and the results of the 2019 Housing Delivery Test for Richmond showed 1,147 homes delivery 2016/17 to 2019/20 against a requirement of 945, a measurement of 121%. It is acknowledged that the New London Plan is set to increase Richmond's housing target to 411 and the Council will work proactively to achieve this annual requirement, including through the preparation of a new Local Plan which is already underway.
- 18.2 The Council recognises that affordability of housing is an acute issue in the Borough and also the challenges in delivering affordable housing to meet Borough needs given the flexibility provided in terms of scheme viability and also in setting a housing target through a local plan/London Plan which is evidence led, takes accounts of environmental and other constraints and therefore cannot meet all housing need in a policy off approach. The Council is committed to increasing affordable housing delivery through various channels, as set out in the recent Draft Housing and Homelessness Strategy (reported to the Council's Adult, Social Services, Health and Housing Committee in February 2020). This commitment is clear from the Council's own Local Plan policy to secure affordable housing from any net increase in homes, recognising the significant contribution that small sites play to delivery of homes in the borough, a fact that is recognised by the emerging London Plan. The Council has set out above the consequent great importance of ensuring that significant and strategic large sites such as this deliver the maximum amount of affordable housing which can be justified through a rigorous and robust review of scheme viability, as should now be required for this scheme. At this stage the Council does not consider that to be the case.
- 18.3 The Council is also committed to making the most efficient use of sustainably located brownfield land (in accordance with the NPPF). That is not to say that the plan-led system should not be followed (para 47 of the NPPF) or that development for housing should come wholly at the expense of all other material planning considerations; in this case to the detriment of the local character and designated and non-designated heritage assets (notably The Maltings and Mortlake Conservation Area), residential amenity (particularly those in Reid Court and residing in Thames Bank), residential quality (Development Area 2) and to meeting specific local priority needs (the weighting of affordable housing towards Intermediate / Shared ownership units rather than rented where the identified need is). A planning balance needs to be applied which has proper and due regard to the requirements set out in the NPPF and in law. It is beholden on the decision maker to explain the reasons for making a decision and for setting out what weighting has been given.
- 18.4 In terms of design, the NPPF sets out:
- *Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics.*
 - *Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.*
- 18.5 In line with the NPPF:

- The Council’s Local Plan, adopted in 2018, clearly sets out the vision for building height, stating new buildings should respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building heights and respect the local context, through appropriate scale, height and mass (LP2).
 - A Planning Brief for the Stag Brewery Site was formally adopted as SPD (which was informed by a detailed assessment of the site and its historical and architectural significance), which sets out maximum heights to ensure the development relates to the existing urban context, grain and scale and reflect the planning benefits being sought.
 - Mortlake Village Planning Guidance, adopted as SPD in 2015, provides character assessments of the area and site, and recognises a threat from development being, “*development pressure which may harm the balance of the landscape and river setting, and the obstruction or spoiling of views, skylines and landmarks particularly associated with Mortlake’s industrial heritage and riverside infrastructure*”.
 - Finally, the Mortlake Conservation Area Statement has been published, which again reiterates the potential threat from development that may harm the significance of this conservation area.
- 18.6 Notwithstanding such adopted policy and guidance, the Council deems the Revised scheme has been driven solely by housing targets, rather than the wider environmental ambitions of local, regional and national policy that seeks sustainable development, and well-designed built environments that protect and enhance the built and historic environment. Further, the Council fails to see how the height and massing of the Revised scheme complies with policies D3 and D9 of The London Plan: Intend to Publish:
- *D3: Development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions;*
 - *D9: Where the edges of the site are adjacent to buildings of significantly lower height...and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*
- 18.7 Therefore, whilst the housing this scheme would deliver is acknowledged, given the current housing delivery performance of the Borough, the housing benefits of this scheme are not deemed to outweigh the harm to heritage assets, residential amenity and residential quality. In the absence of the application of conditions recommended by the Council and the heads of terms setting out the required mitigation, there would be further harm identified as a result of the scheme in terms of impact on infrastructure locally.
- 18.8 Whilst a number of options have been proposed to mitigate for the highway impacts arising from the development, the Council strongly considers such impacts can be sufficiently mitigated by Option 1 – LBR Financial Contribution Scheme, and objects to Options 2-4, which are reliant on further highway approvals and result in the loss of significant existing on-street parking.
- 18.9 Therefore for the reasons set out in this response, as summarised in Table 14 below, the Borough strongly **objects** to the application. If, however the application is approved, the Council expects that the conditions outlined in the Council’s Planning

Committee Report and revised Heads of Terms, as set out in Appendix 1, and conditions and planning obligations identified in this response will be secured.

Application B:

18.10 The Council raises **no objection**, subject to the necessary amendments identified in this response and the conditions and Heads of Terms previously secured and identified in the Councils Planning Committee Report, and associated minutes and revised Heads of Terms document.

Application C:

18.11 The Council raises **an objection**, for the reasons outlined in Section 17.0 and the minutes of the Councils Planning Committee (Appendix 1).

Table 14: Summary of comments

APPLICATION A	
Commercial land use	<p><u>No objections, subject to conditions and Heads of Terms:</u></p> <ul style="list-style-type: none"> • Proposed B1 floorspace • Provision of 10% affordable office space; • Employment and Skills Plan, • Workspace Management Plan. • Secure conditions to restrict the movement between subsections a-g of Use Class E to ensure a balance and avoid an over-concentration of uses. • Limit the minimum and maximum retail provision, • Secure the minimum retail provision along the High Street, • Limit the size of units. <p>(refer to conditions NS79 - NS83 of the Councils Planning Committee report).</p> <p><u>Points of clarification:</u></p> <ul style="list-style-type: none"> • Quantum of B1 floorspace
Housing	<p><u>No objection:</u></p> <ul style="list-style-type: none"> • Residential mix, subject to condition securing same mix within Development Area 2. <p><u>Objection:</u></p> <ul style="list-style-type: none"> • Density (as demonstrated by the unacceptable height and subsequent impact on the character of the site and area)
Affordable housing	<p><u>Objection:</u></p> <ul style="list-style-type: none"> • Quantum fails to meet the Council’s and Mayor’s policy with respect to percentage of on-site provision. • Tenure mix failing to comply with both the Mayoral and Richmond policy requirements. • Phasing and delivery of the affordable housing • Outstanding matters remain regarding affordability, financial viability (particularly BLV, absence of RP offers; use of blended value); oversized units, further modelling using grant Funding to adjust the affordable housing provision; review mechanism

	<p><u>Necessary Heads of Terms:</u></p> <ul style="list-style-type: none"> • Quantum, phasing, triggers, mix, tenure • Affordability, taking account of the impact of service charges. • Review clauses (both to increase in numbers and number of homes for Affordable Rent • Ensuring inputs, including deficit position, are fully evidenced and tested. • An overarching clause to determine that ‘Implementation’ does not include completion of basement works • Details of the arrangements to ensure residents’ access to the proposed communal areas • Consultation and engagement with the Council’s Specialist Occupational Therapist to ensure compliance with Building Regulations M4(3)(2)
<p>Design height and</p>	<p><u>Objections:</u></p> <ul style="list-style-type: none"> • Additional height and consequential impact on the quality of the development, heritage assets, views, Thames Policy Area, MOL and residential amenity • Poor juxtaposition of buildings within the Site: <ul style="list-style-type: none"> ○ Building 5, overwhelmed by the incompatible height of Blocks 6, 7 and 8 ○ Buildings north and south of the new High Street • Elevational treatments – in particular; additional floor to building 5 (and impact on heritage asset), additional massing of Building 8 and 11; turret detailing and fenestration. • Development Area 2 - height and massing and consequential impact on both residential amenity and heritage assets along Thames Bank; oversized dormers in townhouses; • Recommendations: <ul style="list-style-type: none"> ○ use of fenestration to break up the massing and reduce the impact on the additional height and scale – in particular to blocks 2, 7 ○ Amend materials associated to the Cinema building <p><u>Outstanding matters:</u></p> <ul style="list-style-type: none"> • Errors in submission – inconsistency between documents regarding Building 6, 9, 10 • Suitably of application only in outline given height and setting of heritage assets. • Lack of design scrutiny • Design Code – clarity regarding setbacks (paragraph 3.4.1) and confirmation all units will be tenure blind
<p>Internal living standards</p>	<p><u>No objections:</u></p> <ul style="list-style-type: none"> • Internal space standards, light, aspect and outlook; amenity and playspace. <p><u>Objections:</u></p> <ul style="list-style-type: none"> • Development Area 2 - Insufficient space between buildings and impact on quality of accommodation • Insufficient detail – wheelchair accessible homes across all tenures;

	<p><u>Matters for clarification:</u></p> <ul style="list-style-type: none"> • Design Code and floor to ceiling heights <p><u>Necessary conditions / Heads of Terms:</u></p> <ul style="list-style-type: none"> • Compliance with Building Regulations M4(2) and (3)
Play space / outdoor space	<p><u>Playspace objection:</u></p> <ul style="list-style-type: none"> • Quality and location of the proposed play space <p><u>Matters for clarification / Amendments</u></p> <ul style="list-style-type: none"> • Lack of detail with the Design Code regarding private amenity space within Development Area 2 • Further detail required on play space provision and equipment. <p><u>Conditions and Heads of Terms</u></p> <ul style="list-style-type: none"> ○ Impact on public parks and open space – Financial Contribution of £307,586: ○ Playing pitch contribution of £30,000 ○ Community / Public Park contribution: <ul style="list-style-type: none"> ○ Option A: Additional £52,380 – new total, £200,080 for 10-year maintenance; OR ○ Option B: Transfer of the community park land to LBRuT and a financial contribution of an additional £183,400 – new total, £1,069,400 for its delivery and maintenance. • Towpath contribution - £44,265 (as previously agreed) • Heads of Terms as previously secured (Appendix 1)
Public realm	<ul style="list-style-type: none"> • Insufficient detail: Wind impact within the public realm within Development Area 2 • Clarification regarding on-street parking within Development Area 2. Requests this is prohibited.
Residential amenity	<p><u>Objections:</u></p> <ul style="list-style-type: none"> • Visual impact and privacy: Relationship with Reid Court; Parliament Mews; Leyden House, The Old Stables and Thames Bank House and Aynescombe Cottage. • Daylight: Boat Race House; 31 Vineyard Path; Reid Court; Parliament Mews; Thames Bank House and Cottage; 3-9 Lower Richmond Road; and Old Stables. <p><u>Matters of clarification:</u></p> <ul style="list-style-type: none"> ○ Set back of building 19 and heights ○ Setbacks of building 20 – pages 48 and 50. These to be a ‘must’
Transport	<p><u>No objection:</u></p> <ul style="list-style-type: none"> • Reduction in parking • Parking bays along Williams Lane • Electric vehicle charging points • Impact on rail • Option 1 – LBR Financial contribution scheme <p><u>Objection</u></p>

	<ul style="list-style-type: none"> • Options 2-5 (Chalkers Corner light, Bus Lane and Application C) • The Council disagrees with the applicants' opposition to provide a returnable travel plan bond <p><u>Clarification / amendments sought</u></p> <ul style="list-style-type: none"> • Details of the 7% additional disabled parking bays - triggers • Confirmation no on-street parking within the development. • Questionable trip generation data and total trips for the school • Uplift in cycle storage for the school <p><u>Necessary S106 Heads of Terms:</u></p> <ul style="list-style-type: none"> ▪ Area wide Traffic Management Contribution: £1,953,000 ▪ Highway Improvements Contribution: £950,000 ▪ Chalkers Corner Junction Contribution: £1,650,000 ▪ Travel Plans for both Applications A and B – with more ambitious targets for sustainable travel ▪ Travel Plan monitoring - £30,000 ▪ Travel Plan implementation bond - £250,000 ▪ Travel plan target bond to cover seven / eight years – £250,000 ▪ Phased opening of the school ▪ Bus infrastructure and contribution – uplift to meet the needs of the revised scheme ▪ Controlled Parking Zone consultation and implementation -prior to occupation ▪ Removal of car parking permits • Highway works as outlined in drawing 38262/5501/058H • Bus infrastructure – Section 278 • TfL pedestrian improvement scheme on Lower Richmond Road, Mortlake Highway Street, Sheen Lane - £228,878.00 • Level Crossing and Bridge: <ul style="list-style-type: none"> ○ Additional bridge signage; ○ General improvements to the pedestrian bridge; ○ Moving bollards back on both North and South Worple Way; ○ Setting back vehicle stop lines. ○ improved surfacing of the road,
<p>Energy</p>	<p><u>No objection</u>, subject to uplift in the carbon offset contributions</p> <p><u>Outstanding matters:</u> Absence of a Sustainable Construction Checklist and questions regarding the calculations for the carbon offset contribution.</p> <p><u>Section 106:</u></p> <ul style="list-style-type: none"> • Revised Carbon Offset Payment (and safeguards in place for potential uplifts as summarised in Table 13b) • Heads of Terms to secure further Carbon Offset Payment if the above carbon savings are not met.
<p>Pollution</p>	<p><u>Air pollution:</u></p> <ul style="list-style-type: none"> • No objections, subject to conditions and uplift in S106 financial contribution towards air quality measures (£90,000) and resourcing for compliance and regulation (£60,000). <p><u>Odour, Light and Noise Pollution:</u></p>

	<ul style="list-style-type: none"> No further comments subject to original conditions and heads of terms
Trees	<p><u>Outstanding matters:</u> Removal of street tree (part of G151) and need for CAVAT valuation to inform necessary compensation.</p> <p>No further comments, subject to original conditions and heads of terms</p>
Ecology	<p><u>Outstanding matters:</u></p> <ul style="list-style-type: none"> Need for further surveys Need for net gain assessment
Impact on local infrastructure	<p><u>Education</u></p> <ul style="list-style-type: none"> No objection, subject to Application B being approved. <p><u>Health:</u></p> <ul style="list-style-type: none"> No objection, subject to the uplift in a financial contribution towards health services (£595,660)
Waste Management	<p>Site wide outstanding matter - swept path analysis for a refuse collection vehicle</p> <p><u>Development Area 1:</u></p> <ul style="list-style-type: none"> Commercial – no objection, subject to conditions Residential - outstanding matters – contingency plan; lack of detail on basement plans and regarding bulky waste storage and food waste; insufficient refuse storage facilities in building 4; Section 106 necessary for secondary collection. <p><u>Development Area 2:</u></p> <ul style="list-style-type: none"> No objection subject to conditions regarding capacity, estate management, access. <p><u>Circular Economy Statement:</u></p> <ul style="list-style-type: none"> A twice weekly collections and lack of details for commercial waste - adverse impact for environmental performance The Council is unable to 'liaise' with the Facilities Management Team. The collection process is based on the need for efficient collection vehicle routing; times are not provided and just fixed to specified day(s) after 6am. Conditions will be necessary to ensure refuse and recycling bins are located within the collection areas on the specified days. Monies in perpetuity are necessary for the second delivery within Development Area 1. Lack of confirmation there is adequate space for all refuse and recycling bins plus bulky waste Additional bins required for each basement store to enable occupants to continue to deposit waste in them on collection days.
APPLICATION B	

Design	No objections are raised to such amendments.
Landscaping / trees	No objections, subject to conditions
Highways	Refer to Application A comments
Waste	Insufficient detail regarding, detailed swept path drawings; management arrangements for the shared use of the bus / servicing drop off area; detailed drawings showing the arrangement of sufficient bins to cater for the development.
APPLICATION C	
No changes, and thereby no further comments to those outlined in the Councils Planning Committee minutes and revised Heads of Terms (refer to Appendix 1)	

The Council respectfully requests a response to the matters outstanding and clarification on the numerous points raised where there are discrepancies in the documentation or contradictions. To aid those stakeholders engaged in this process this should be provided in advance of the Hearing and made available on the GLA website with the application documentation. Of key concern are the highlighted discrepancies between the ES Addendum and the Planning Statement.

Should you have any questions regarding anything raised in this letter, do not hesitate to contact Lucy Thatcher via telephone (020 8 891 7691) or email (Lucy.Thatcher@richmondandwandsworth.gov.uk)

Yours Sincerely,



Jenifer Jackson
Assistant Director of Environment & Community Services (Planning and Transport)

Enclosed.

- Appendix 1:* The Planning Committee Report, Addendum, Minutes and Amended Heads of Terms to reflect the Council's Planning Committee resolution.
- Appendix 2:* Housing delivery, dated September 2020