Date: 14 February 2023

Introduction

The tables below have been prepared to provide responses to the consultation comments received during the re-consultation exercise (16 Dec 22–14 Jan 23) on the substitution documents, drawings and responses submitted pursuant to the Former Stag Brewery Redevelopment applications (refs: 22/0900/OUT and 22/0902/FUL).

Application A (ref: 22/0900/OUT)

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Accelar Comments	Provided in separate document, dated 27 January 2023.	See Appendix 1.
Police	I strongly recommend the below conditions are placed on the development and that the developer follows the latest Secured by Design Development Guides, in particular the latest "Homes" guide which can be found here ww.securedbydesign.com/guidance/design-guides. 1. The development shall achieve 'Secured by Design' accreditation awarded by the Design-Out Crime Officer from the Metropolitan Police Service on behalf of the Association of Chief Police Officers (ACPO). 2. Prior to first use accreditation will be evidenced as achieved and evidence of such accreditation will need to be submitted and approved in writing by the Local Planning Authority.	Noted.
	Design and Layout Permeability - The site has a substantial amount of permeability which does create an open, social environment for residents and visitors alike. We would like the opportunity to work with the developers and architects to review the access routes on site. Permeability has potential to increase the opportunity for crime as it allows perpetrators of crime to walk freely in a location without being challenged or be seen out of place. Defined routes with clear walkways are crucial in preventing crime and ASB, access controlled gates at strategic locations or removing a cut through	Squire & Partners gave a presentation to the Design-Out Crime Officer in October 2020. The design team would be happy to work with the Design-Out Crime Officer further at the detailed design stage. The permeability of the site is very important to the design, making the site open and inviting and activating the ground floor as much as possible. Therefore introducing access controlled gates or removing cut throughs would have a detrimental effect on the

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	would not hinder a resident but will make it much harder for	scheme. The active ground floor uses, good lighting and
	opportunistic criminals to target the area and much more likely	natural surveillance from the residential apartments and
	they would be identified suspicious by residents.	flexible use at ground floor would be sufficient to deter
		criminals.
	<u>Pedestrian walkways</u> - should not be segregated from other routes	The whole of the eastern site is pedestriansied (except
	(vehicle or cycle) be routed so that they pass by active rooms or	for service vehicles) with wide public routes with plenty
	buildings to increase natural surveillance. Natural, informal or	of surveillance. The narrower strips between buildings
	formal surveillance is absolutely essential on large permeable	are not considered 'alleys' as the buildings are at least
	estates. Any footpaths, particularly where they form an alley	10m apart, relatively short in distance and have
	between buildings should be kept straight with a clear line of sight	apartments looking onto them.
	so that it is possible to see all the way through from the main road.	
	Buildings should be positioned to ensure that 'active rooms' are over vulnerable areas, like cycle storage areas and car parking	Natural surveillance is achieved through the site with the following:
	, , ,	Pedestrianisation of large areas creates spaces
		that are clearly intended for public use, helping
		to create a sense of ownership of the area
		among the local community
		 Active frontages from shops and restaurants,
		which brings people to the site at various times
		of the day.
		 Building entrances are clearly marked
		encouraging correct use of the environment
		through natural access control and territorial reinforcement.
		 Attractive street furniture items encourage
		interactivity between visitors, residents, and the
		streetscape. Benches and planters help to create
		aesthetically pleasing, practical spaces that can
		be used by residents and visitors alike. Adding
		plants and flowers signifies that particular care
		and attention has been put into an area, which
		also deters criminality. "Crime prevention
		through environmental design (CPTED)"

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		 A well maintained and looked after environment creates a sense of safety. Front porches, balconies and windows overlooking all circulation routes. No blank facades. Trees have a clear stem of at least 1.8m allowing clear views through the site and shrubs at the publicly accessible areas are kept to the minimum. Area lighting with cut-off luminaires to prevent glare. Lighting to all entrances, control points and to any dark corners. Cycle storage areas are in the basement and access controlled. Bin stores are at ground floor level along the main routes through the site and therefore have natural surveillance from street level as well as the residential
	<u>Defensible space</u> - is extremely important and should be provided	apartments above. Residential properties that face onto the garden podium
	in front of any residential properties where it faces onto the public realm. It can be achieved by defensible planting, low fencing or	areas have small private gardens which will be gated.
	even a change in pavement colour to mark a semi-private area. It is evident from looking at a sample of the ground floor plans that this	Comment about the gates being lockable is noted.
	appears to have been provided for with what appears to be a small garden outdoor area. These areas are gated and the gate would need to be lockable to secure the area as private.	Residential properties that face onto the public routes also have private gardens. These properties are 1m above the path level, naturally creating defensible space.
	<u>CCTV</u> – We strongly recommend a CCTV system linked to a continuously monitored central control. The size and scale of this development combined with the additional people both moving in to live and visit the area for its commercial aspects mean it is extremely important that provision is made for good surveillance.	Noted.

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	<u>Lighting</u> - A good lighting scheme is essential to ensure that all areas are walked around. This will offer good surveillance whilst also preventing congregation of persons set to exploit low lighting level.	Noted.
Police	Individual flats:	Noted.
(contd.)	 SMART meters to be fitted. All flat entrance doors to be PAS24:2016 or STS201 door sets. All accessible ground and accessible windows to be PAS24:2016. Ground floor balcony areas need to have suitable fencing 	
	with defensible space/planting in front.	
	<u>Communal entrances:</u>	Comments about communal entrance doors, access
	 Airlocks in communal entrances to be implemented to prevent tailgating. 	control and post boxes are noted.
	 Where blocks have 25 or more flats compartmentation should be implemented. This can be discussed on a block by block basis as other measures can be taken if compartmentation is not an option. 	Comments about airlocks and compartmentation are noted and would be reviewed at detailed design stage.
	 Front communal entrance primary doors to be a security rated door set as specified by the design out crime officer, the inner door can be an FD30 or FD60 secure door with video & audio access control. 	
	 Video & audible access control to be used on external communal doors also with no trades buttons. Access control should have data logging capability. Any post boxes to be security rated to prevent theft & 	
	fraud. They should be located within a secure area behind a security rated door (in an air-locked lobby) and covered by CCTV.	
	 Gates, storage, outbuildings and miscellaneous: Dual pole push to exit buttons should be fitted at fire egress points. 	Noted

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	 Bin store to be fitted with a 'high level louvered' slam-shut door. Cycle storage will need security rated door sets to be determined by the design out crime officer closer to the time. 	
	 Any basement car park areas will need to be secured by tailgating preventing gates with a suitable fast closing mechanism. 	
	 Any car parking areas to have good lighting lux levels. Vehicle gates and pedestrian gates to be robust, secure and un-scalable to be fobbed for entry. Any push to exit switches by the pedestrian gates to be set back with a shroud if necessary to prevent reaching through from the exterior face. Roof access will need to be controlled and the access door / hatch alarmed. Footpath alleys should be avoided, if not they need to have a clear line of sight with no bends and where possible "Commando Lamp Posts" to allow fitting of CCTV if the 	
	location is not already covered.	Noted
	Concluding remarks - This development will significantly change the characteristics and dynamics of the area with a huge population increase as well as attracting many visitors from elsewhere. The area is at risk of acquisitive crime like burglary, bicycle theft and theft from motor vehicle as are other similar areas in Richmond. The size of the development and the number of people it will bring to the area will have a substantial impact on the community and infrastructure. I strongly recommend that this development is conditioned to achieve Secured by Design accreditation. I also strongly advise that the applicant follows the design guidance contained within Secured by Design New Homes 2019, Commercial 2015 and Schools 2014 guides. These guides are subject to	Noteu

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	continual updates so the most recent guide should be referred to via this link which is listed above. I have not had the chance to meet with the applicant although they have previously liaised with our office. I look forward to working with the developer on this project in the future.	
	Recommendations - I see no reason why all aspects of this development cannot achieve Secured by Design accreditation and as stated above to ensure that the development achieves an element of security for the rationale above I would like to request the following planning conditions if an employee requirement to achieve SBD accreditation has not already been sought;	Noted.
	 The development shall achieve 'Secured by Design' accreditation awarded by the Design-Out Crime Officer from the Metropolitan Police Service on behalf of the Association of Chief Police Officers (ACPO). Prior to first use accreditation will be evidenced as achieved and evidence of such accreditation will need to be submitted and approved in writing by the Local Planning Authority. 	
	These planning conditions are in pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well-being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 and to ensure the development provides a safe and secure environment in accordance with the London Plan 2021 in Section B of policy D11.	
Lead Local Flood Authority	Drainage hierarchy: MORE INFORMATION REQUIRED – the green roof and water butts should be shown on the drainage drawing	<u>Drainage hierarchy:</u> The following text is provided on the drainage strategy drawing:

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		"Green roofs and water butts are to be incorporated across the Site to provide source control and facilitate water reuse. The proposed location of green roofs can be found on the sitewide urban green factor drawing (P10736-00-004-GIL-0802), which is available in Appendix K of the submitted drainage strategy report. The proposed Location of water butts is to be determined at detailed design stage but can be indicatively assumed based on the location of the development blocks, as shown within the development proposals."
	Attenuation volume: FAIL – the attenuation volume proposed (3,686m³) is equal to or greater than the attenuation volume required (2,591m³). However, there are some discrepancies in the proposed attenuation volume as the Drainage Strategy Part 1 states that a total of 3,686m³ is proposed whereas totals from the Proposed Surface Water Drainage drawing (ref: 18671-WIE-ZZ-ZZ-DR-D-92001) indicate a proposed attenuation volume of 3,583m³. It must be demonstrated that the site will not flood as a result of the 1 in 30 year rainfall event, that there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event, and onsite flow as a result of the 1 in 100 year event with a climate change consideration must be suitably managed.	Attenuation volume: Please note there is a typo on the drawing. The Drainage Strategy drawing and report will be updated to reflect the proposed storage volumes, as provided in table 3 of the Drainage Strategy (to be issued to LBRuT w/c 13 Feb 23 as Appendix 7 of this note). The surface water network has been designed to attenuate runoff to greenfield runoff rates. Storage features have been designed with sufficient capacity for the 1:100+CC event. Therefore, the site will not flood as a result of the 1 in 30 year rainfall event, that there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event, and onsite flow as a result of the 1 in 100 year event with a climate change consideration will be suitably managed.

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		Table 1: Proposed Discharge Rates and Attenuation Provision		es and Attenuation
		Catchment	Area (ha)	Attenuation (m³)
		East part of the Site –	0.30	257
		East part of the Site – 2	0.25	214
		East part of the Site –	0.18	152
		West part of the – School	1.31	1178
		West part of the Site – 4	1.07	922
		West part of Site – 5	0.92	825
		West part of the Site – 6	0.79	323
		Sub-Total	4.84	3876
		Total*	5.69	3876
Flood emergency officer	Observations i. While the author of this report believes the site not to be at risk of flooding, the site is within the Flood Zone. Therefore, we firmly recommend that all residents and business are signed up to floodline and that the EA Flood Warnings and appropriate actions to take are clearly		and approp	ergency Plan sets out riate actions to take, rtion G.3.5).

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	ii.	explained in the Flood Emergency Plan, including evacuation actions. We note that the proposed exit route from the Maltings is through up to 0.5m of flood water. Contact with flood water should be avoided if possible, as it contains both physical hazards and hazards to health.	ii.	This comment is noted. A flood depth of 0.5m would only occur following a significant breach of the defenses and inundation of the surrounding area. This would not represent a typical design event of (say) 1 in 100 with allowance for climate change, the probability in practical terms is much lower than this. In the case that such an event did occur, water may have entered the building where the floor level in the lobby areas is at 5.53 m AOD – the same as the lowest external level. There would accordingly be no change in depth of water on leaving the building. Furthermore, the enclosed nature of the external area means that the water would be standing water, with no added hazard due to there being any velocity. It is a short distance that would need to be traversed to reach the safe level at 6.03 m AOD. This is reflected in the application of the Hazard Matrix in Table G-1 (in Section G.3.5 of the Flood Emergency Plan), which is considered appropriate.
	iii.	Please note, it remains the sole responsibility of the developer/owner to ensure that the plan is effective in meeting the relevant requirements, is reviewed regularly and is kept up to date. Neither the Council nor any member of its staff shall be held liable for any loss or damage arising in any way whatsoever in relation to the	iii.	Noted.

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	plan and, in particular, out of any failure by any organisation or individual independent of the Council to have or implement any measures relating to emergency evacuation.	
Waste	 i. Table 6.1 sets out the proposed number of bins for each bin store – although I believe the 'indicative number of bins for recycling based on collection twice a week' actually details the quantity required for a once weekly collection. ii. We support the proposal to include food waste bins in the communal stores at a ratio of 1 bin per 10 flats. iii. Our collectors require free access to bins at all times using either a FB1 or FB2 lock. iv. The push route between the bin stores and refuse vehicle must be hard standing and free of any steps or steep slopes. v. Dropped kerbs are essential so that bins can be safely pushed into the highway. vi. Servicing Routes are shown in Appendix B of the OWMS, however I can't spot any accurate swept path analysis demonstrating that the estate roads are satisfactory for a refuse collection truck (dimensions provided in section 5 of 2015 Waste SPD) 	 i. Table 6.1 has been amended to reflect twice a week collected as discussed and agreed with LBRuT. This has been included in an update to the Operational Waste Management Plan (OWMP) (see Appendix 2). ii. Noted. iii. Noted. iv. Confirmed based on the push routes shown in Drawing 38262/5520/20C (Appendix 2). v. Confirmed based on the push routes shown in Drawing 38262/5520/20C would be level. vi. A detailed vehicle swept path analysis was undertaken and included in the March 2022 submission. Drawing 38262/5520/07B (Appendix 2) has now also been included in the updated OWMP.
	 i. Table 6.2 (much in the same way as 6.1) appears to show refuse bins based on twice weekly and recycling based on weekly ii. Para 6.2.5 states: The proposed residential units in Development Area 2 will continue to be developed to meet LBRuT's storage and collection arrangement. To my mind this should incorporate a once weekly waste collection. 	 Development Area 2 i. Table 6.2 has been amended to reflect twice a week collection as discussed and agreed with LBRuT. This has been included in an update to the OWMP. ii. This statement has been clarified in an update to the OWMP.

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Port of London	The PLA continues to have no in principle objection to the re- development of the site and continues to be keen to see the opportunities for the river and river use to be maximised.	Noted
	It is questioned why Notice was not served on the PLA given the extent of the red line boundary.	A letter addressing this point, dated 25 January 2023, was sent to lucy.owen@pla.co.uk on 25 January 2023 (Appendix 3). Receipt was confirmed by the PLA on 25 January 2023.
	i. It is understood that the application site has been designed so that there are routes through to the River and opportunities to engage with the River and there is an overall desire to enliven and activate the riverside space. This is welcomed and would assist in meeting the Thames Vision's aim of more people enjoying the Thames and its banks. ii. It is disappointing that the opportunity was not taken to revisit the location of the boathouse and the river related facilities being provided – the PLA had previously highlighted issues such as the area dries (i.e. at low tide there is no water) and therefore it would not be possible to provide full tidal access for the rowing club to the river. The drawdock is also susceptible to flooding at high waters, which could again cause access limitations (see attached for previous comments). With a review of the proposed development there might have been the opportunity to enhance the river related offering as part of this development and relocate the boathouse to the western side of the site. The applicant should explain the reasonings for the river related facilities remaining in building 9 and should provide all the necessary supporting documents if the boat house is to remain within building 9,	ii. Building 9 is the most appropriate location for river relating use given its proximity to the existing slipway. Please see also correspondence from Fulham Reach Boat Club, dated 17 June 2022, submitted in August 2022. The correspondence states that "having reviewed the current charts we envisage that controls could be put in place to help mitigate any potential risks that come from the riverbed silt being presented during the low spring tide. This could include a change to operating hours during the predicted spring tides and suitable PPE being available to all participants. We note there is precedent in operating a rowing club from a silted part of the river such as is seen from Thames Tradesmen Rowing Club, located on the North Shore by Barnes Bridge".

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	including the swept paths that were previously undertaken			
	(see attached). Towpath Works / S106			
	i. The PLA owns the towpath which runs along the river bank in front of the Stag Brewery site but the land is unregistered. The Council presently manage the towpath in its role as Local Highway Authority. Minimal works are	i. Noted.		
	proposed to the towpath to preserve the current character of the route and the Town Planning Statement confirms that the proposed works to the Towpath remain unchanged under this Application.			
	ii. The PLA had reached a position on application 18/0547/FUL where we had been discussing with the Applicant the wording in any \$106 agreement and a licence for works in relation to the proposed towpath works. These discussions will need re-visiting and concluding in relation to application 22/0900/OUT in due course.	ii. Noted.		
	iii. The PLA welcomes the applicant's commitment to the works along the towpath including the provision of riparian life saving equipment. The PLA would also recommend that the works are designed to incorporate suicide prevention measures. The PLA is happy to work with the Applicant and Council to ensure this important feature is fully incorporated within the design and the following guidance may be of use to the Applicant https://www.pla.co.uk/assets/asaferriversidev15.pdf	iii. Noted – The Applicant would be happy to work with the PLA further at the detailed design stage. Lifesaving equipment and signage would be located as directed by the PLA to comply with health and safety requirements on the towpath.		
	Use of the River During Construction The Framework Construction Management Statement states at Section 8.1 that consideration has been given to "whether the river could be utilised for logistics, either for removal of spoil associated with the demolition phase or to transport materials associated with	Noted, a River Transport Feasibility Study will be undertaken post-determination and secured through a suitably worded planning condition.		

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	the construction phase. A number of significant constraints have	
	been identified in respect of river use, including the highly tidal	
	nature of the river in this location, the significant use of the river in	
	this location (rowing clubs and leisure users) and the poor quality	
	and condition of the wharf and river wall. Notwithstanding this,	
	and subject to securing appropriate permissions and permits, a	
	River Transport Feasibility Study could be carried out to identify	
	whether there is any scope to use the river and overcome the	
	constraints identified."	
	The PLA disagrees with many of the Applicant's points for example,	
	the River Thames is tidal throughout the entirety of the PLA's area	
	of jurisdiction and that does not prevent substantial volumes of	
	material being transport by water. However, the PLA does agree to	
	the carrying out of a River Transport Feasibility Study and it is	
	recommended that this is secured through a condition on any	
	grant of planning permission.	
	External Lighting	Principle of condition noted and accepted, subject to
	A Lighting Strategy has been developed which advises that the	suitable wording.
	towpath will remain unlit. A condition on any grant of planning	
	permission should require the submission and approval of full	
	lighting details and demonstrating compliance with the ILP	
	Guidance Notes for the Reduction of Light Pollution and the CIBSE	
	SLL Lighting Guides for 'Limiting Obtrusive Light', 'The Exterior	
	Environment' and 'Protecting The Night-Time Environment'.	
	River Works License	Noted.
	It is still proposed that surface water will be disposed of via three	
	outfalls to the River Thames and that flow rates would be	
	unrestricted. There is a reference to re-using an existing outfall if	
	possible and two new outfalls being provided. A river works	
	licence is required for all works over mean high water.	

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Topic Trees	Unable to approve the application at this time until the LPA receives a satisfactory response regarding my comments on "Tree Root Protection Areas (RPA) - update and provide existing site conditions, sections 2.15-2.17" C. Tree Root Protection Areas (RPA) - update and provide existing site conditions, sections 2.15-2.17 Modified RPA. The applicants Arboriculturists have chosen examples (T70 - T82) where there is little or no impact on the RPA by external factors and infrastructure. However, a better representation of the requirement for the implementation of modified RPA would be between Trees T43-T44, T48-T57 & T83-T85 where the existing	Applicant Response (14 February 2023) As stated in "Former Stag Brewery, Mortlake, Hybrid Planning Application (22/0900/OUT) & Detailed Application School (22/0902/FUL) Briefing Note — Response to Consultee Comments on Arboriculture (Doc. Ref. WIE18671-114-BN-3.4.1-Arboriculture Response)", an assessment of the impact of the proposed development on the retained trees was undertaken on a tree-by-tree basis. As the existing site is heavily developed, there are a number of factors constraining the morphology of the tree roots, and as such, any modification of the RPA as requested by the Tree Officer would still represent
	adjacent highway would be a recognisable factor in asymmetric root growth of these trees, which needs to be illustrated on the submitted plans. Consequently, I will require modified RPA's for trees T43-T44, T48-T57 & T83-T85 only.	nothing more than a best guess. For this reason it was decided to leave the RPAs as circles as this provided the best chance of ensuring adequate protection on all sides. This would be in accordance with the recommendations made in paragraph 4.6.2 of BS5837:2012 which state that "the RPA for each tree should initially be plotted as a circle centred on the base of the stem. Where pre-existing site conditions or other
		factors indicate that rooting has occurred asymmetrically, a polygon of equivalent area should be produced. Modifications to the shape of the RPA should reflect a soundly based arboricultural assessment of likely root distribution." This is clearly demonstrated in the case of T48-T57. These trees grow surrounded by concrete, with existing haildings to the west a well to the case and existing
		buildings to the west, a wall to the east and existing underground services and the adjacent road further influencing root morphology. In this instance it was felt

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		that retaining a circular RPA provided the best chance of
		providing adequate protection to all sides.
		Photo 1 – area around T48 – T57 with evidence of underground trench visible in concrete pad to left of trees (linear scar in concrete).

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		Photo 2 – extensive underground structures present to south of T56 and evidence of trench to west.
		In the case of T43 to T45 and T83 to T85, it was still felt that it was reasonable to assume circular RPAs, the sketches below demonstrate that even if modified based on the adjacent roads and significant buildings, the modification would not significantly alter the tree protection requirements (sketches taken from Masterplan Applications A&B – Tree Protection Plan (Off-Set RPAs) (Dwg. Ref. 18671-WIE-ZZ-XX-7706-P01) (see Appendix 4).
		In the case of T43 to T45, modifying the RPA from the road would mean that a slightly larger area of the proposed new surfacing would fall within the Construction Working Area (CWA) but the construction methodologies to be employed within that CWA would not change. This difference is considered to be so small,

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	that it was not felt that modifying the RPAs would have
	represent a significant benefit to the trees.
	In the case of T83 to T85, off-setting the RPA based on the road and larger building to the north, would potentially extend the RPA of one of the trees further below the footprint of the proposed building, however as with trees T48 to T57 this is also within an area of existing hard surfacing which will have had the potential to impact the morphology of the tree roots, and as such it is not certain that any roots will extend into this area. Again, due to uncertainty relating to the morphology of roots in this area, it was considered that circular RPAs represented the best way of maximizing protection to the trees. Even if the off-set RPA shape is used, it is not felt that the minor loss of RPA (particularly as is it below an area of hard-surfacing) will have a detrimental impact on the trees. The fact that this area of hard-surfacing is being replaced with soft landscaping represents an

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Parks	 i. Cross-referencing the play provision map (Dec 2022) with the landscape GA plan shows some areas included as playspace which may not be genuinely playable. For example, some play spaces include access paths and planted areas which may need to be excluded from the total. Recommend condition ii. The landscape plans don't show a large amount of play infrastructure but it is understood that this will be indicative at this stage. It should be expected by the applicant that an appropriate quantity of play infrastructure of the full range indicated in the DAS for each age group is provided. iii. In particular, the areas indicated for 12+ are within areas with other uses, such as the Entry Plaza, riverside steps north of Maltings Plaza and Bottleworks Square, and show no play elements on current plans. These areas must still include some degree of play. 	 i. Principle of condition noted and accepted, subject to suitable wording. ii. The landscape has been carefully designed to accommodate both areas high in biodiversity and areas of natural play. Children will circulate freely in those spaces, moving from one natural play element to the next. The play strategy is based on the idea of natural play, where play elements blend with their natural surroundings. This natural play elements, such as balancing beams and play logs will be detailed at the next stage of design. iii. Maltings Plaza and Bottleworks Square are multifunctional spaces that can be utilised by the 12+ group for ball games or for socialising. They can also be easily transformed to areas that can stage plays or musical performances. The water feature that runs through Maltings

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		Additionally, the Community Use Agreement with the school will allow the sports pitch and MUGA to be utilised by the local community outside school hours.
	Resin bound gravel does not feel an appropriate surface for this environment. Parks would prefer to see the existing granite setts or another more fitting surface through this section.	Resin bound gravel could be substituted with self-binding gravel for a more natural feel fitting to the context, but also consistent with other paths along the Thames. Granite setts, though existing elsewhere along the path, create a surface that is uneven and difficult to be universally utilised, and more difficult to navigate when wet. It also makes it uncomfortable for cyclists, as this route is identified in the circulation strategy as a tertiary route for bikes (Landscape DAS, p28). Existing granite setts will be retained and cleaned up as explained in the Landscape DAS (p119-131).
	Community Park Subject to confirming the approach to the Community Park (see below), we may need a condition covering the specification and layout of the park	Noted.
Ecology	The description of the planning permission applied for in the Supplementary Protected Species report (Waterman dated September 2022) is not the same as listed on the consultation document	Description of development is consistent with that applied for by the Applicant in March 2022. LBRuT subsequently re-ordered to description for the purposes of consultation.
	The Supplementary Species report (Waterman dated September 2022) states in the last line of para 5.1, page 35 that 'eight bat species were recorded', this should be 'a minimum of 8 species recorded' as the Myotis and Nyactulus species were not able to be identified to species level and could therefore be more than one species.	Eight confirmed species were recorded, this can be amended to a minimum of eight species given myotis was only analysed to family level. No additional species would come from the nyctalus family as both noctule and leisler's were recorded. Based on the clarification provided above, Waterman do not consider it necessary to revise the chapter wording.

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	The Lighting lux figures as per the Michael Grubb Studio drawing	To ensure all Waterfront lighting is below 1 Lux,
	547-500-CA-EX-MP Revision B dated 19.07.22 are still too high on	Reference CA/3 Column mounted luminaires have been
	the riverfront adjacent to the Maltings, (although officers can't see	adjusted towards the Malting's Plaza, away from the
	what height the lux calculations are estimated at - high tide level or	waterfront. Glare shields and snoot accessories will be
	3m above?) the lux level needs to be 1 lux or below. (1 lux is	specified at stage 4, for Ref.CA/3 luminaires to further
	moonlight). This is especially important in light of 8+ bat species	reduce unwanted light spill and glare. Please refer to the
	being recorded on site. (of we compare to the Wetland Centre	revised Michael Grubb Studio lighting drawing: 547-500-
	which has 9 species recorded).	CA-EX-MP-C (Appendix 5).
		Luminaire references LA/3 and WA/1 have been omitted
		from the graded walkway and steps between the
		existing Waterfront Towpath and Malting's Plaza, to
		ensure no spill light towards the waterfront.
		Amendments to the lighting plans have been highlighted
		with revision clouds, on Michael Grubb Studio drawings:
		547-001-DR-EX-MP-D, 547-002-DR-EX-MP-D, 547-005-
		DR-EX-MP-D, and 547-500-CA-EX-MP-C (Appendix 5-
		same as above).
		Please read Michael Grubb Studio drawing: 547-500-CA-
		EX-MP (Appendix 5), in conjunction with Waterfront
		Lighting Assessment document: 547-(011)-RP-EX-LA-B
		(Appendix 6). Waterfront lighting is now below 1Lux
		with all luminaires emitting light downwards to ensure
		no impact on bat or other existing ecologies.
		Lighting Calculations have been calculated at the
		existing Waterfront level (+4.66), and the Malting's Plaza
		level (+6.70). Water level has been calculated at high
		tide. Please note lighting levels will fall with lower tide
		levels.

Topic	Consultee Comment	Applicant Response (14 February 2023)
	Policy LP15 asks for an enhancement from planning applications	Suggested condition not considered necessary.
	and any loss of those 8 (+) species would be a loss. Would a	
	condition be agreed for a 5 year monitoring programme to ensure	Monitoring is not required, and the enhancement
	no loss of bat species diversity?	measures already provided for bats as part of the
		proposed development is sufficient (already detailed in
		the reporting).
		From monitoring it would be difficult to prove that the proposed development has caused any
		decrease/increase in bat species locally as a host of
		other factors locally (including natural changes in
		environmental conditions) will also impact on bat
		abundance.
	detailed landscaping plans will need to be provided but the species	Detailed landscaping plans and planting schedule will be
	(except the Crocosmia which will need to be replaced) identified in	provided at the detailed design stage. The comment on
	the part 3 (pages 42 - 46).	the Crocosmia has been noted.
	The Biodiversity Net Gain report (Gillespies dated March 2022)	The applications have been considered together as the
	provided covers both sites but should be individual to the site,	applications are linked.
	please redo the calculation and resubmit.	
Conservation	D) BUILDING 10 UNBALANCED AND OVERSCALED, IMPACTING	Montagu Evans have provided the following response:
	UPON ADJOINING BTMS AND CONSERVATION AREA	
		"In response to officer comments, building 10 has been
	Conservation Officer response:-	reduced in height by one storey (to six storeys) to
	The height and scale of Building 10 has been responded to by	improve its relationship with the Buildings of Townscape
	Squires under point 6 of the Applicant Response Document and in	Merit adjacent. The top storey is set back.
	the Design and Access Statement Addendum, although the	
	architects' response differs from the heritage consultant, in that	As stated in the Montagu Evans consultation response
	they have addressed the issue by lowering the building to that	dated 9th August 2021, it would be seen from the east
	shown in the previous application and adjusted the fenestration	(View 8) in the context of a roofscape of no particular
	pattern to be more vertical. This revision to the design is therefore	quality with a set-back upper storey in contrasting
	not taken into account in the heritage consultant's notes and	lighter materials. The fenestration, as discussed in that
	needs to be amended by him.	document, contributes to the vertical rhythm of the

Topic	Consultee Comment	Applicant Response (14 February 2023)
		building, forming a well-articulated and modelled
		façade.
		Further west, along Mortlake High Street, the building
		would improve the appearance of the Site through the
		provision of a new active frontage and street vitality.
		We don't consider there would be any harmful setting
		effect on buildings of townscape merit, or on the
		Conservation Area."
The EA	Condition 1: Implementation of Flood Risk Assessment	Noted – wording agreed
271	The development permitted by this planning permission shall be	Trotted Wording agreed
	carried out in accordance with the submitted Flood Risk	
	Assessment (FRA (Version 5, March 2022 by Hydro-Logic Services)	
	and associated documents, and the following mitigation measures	
	detailed:	
	finished floor levels for residential accommodation shall be set	
	no lower than 7.03 metres above Ordnance Datum (mAOD)	
	 no sleeping accommodation shall be located at basement level 	
	• the crest level of the proposed new flood defence line will be set	
	at a minimum of 6.70 mAOD	
	• the alignment of the proposed flood defence line will be as set	
	out in drawing ref: P10736-00-004-GIL-106, Rev P00 (Gillespies,	
	January 2022)	
	The mitigation measures shall be fully implemented prior to	
	occupation and subsequently in accordance with the timing /	
	phasing arrangements embodied within the scheme, or within any	
	other period as may subsequently be agreed, in writing, by the	
	local planning authority.	
	Reasons	
	To reduce the risk of flooding to the development and occupants.	

Topic	Consultee Comment	Applicant Response (14 February 2023)
	To comply with paragraphs 159 and 164 of the NPPF, Policy LP 21-	
	Flood Risk and Sustainable Drainage of the Richmond Local Plan	
	(2018) and the requirements of the Thames Estuary 2100 plan.	
	Condition 2: Detailed flood defence design	Noted – wording agreed
	The development hereby permitted must not be commenced until	
	such time as detailed design drawings for all new and upgraded	
	flood defence structures has been submitted to, and approved in	
	writing by, the local planning authority.	
	The scheme shall be fully implemented and subsequently	
	maintained, in accordance with the scheme's timing/phasing	
	arrangements, or within any other period as may subsequently be	
	agreed, in writing, by the local planning authority.	
	Reasons	
	To ensure a fit for purpose flood defence line is provided, and to	
	reduce the risk of flooding to the development and occupants.	
	To comply with paragraphs 159 and 164 of the NPPF, and Policy LP	
	21 of the Richmond upon Thames Local Plan (2018).	
	Condition 3: Artificial lighting	Waterman have the following comments on the
	No development shall take place until a sensitive lighting	proposed condition wording:
	management plan has been submitted to, and approved in writing	
	by, the local planning authority. This plan should demonstrate no	The condition wording should be consistent with that of
	net increase in artificial lighting to the River Thames and foreshore,	LBRuT recent comments on lighting. Specifically
	as well as to any primary bat foraging and commuting routes	referring to 1 lux along the River Thames - rather than
	across the development site.	no net increase to 'other primary bat foraging and
	The scheme shall be fully implemented and subsequently	commuting habitats on Site'.
	maintained, in accordance with the scheme's timing/phasing	
	arrangements, or within any other period as may subsequently be	
	agreed, in writing, by the local planning authority.	If this condition is to be implemented, the EA will need
	Reasons	to define what the other 'primary bat foraging and
	Surveys have highlighted that a range of bat species are present at	commuting habitats on Site' are.
	the development site for both roosting and foraging. These species	communing maxitats on site are.
	are sensitive to any increase in artificial lighting of their roosting	
	and foraging places and commuting routes.	

Topic	Consultee Comment	Applicant Response (14 February 2023)
	To comply with paragraph 185 of the NPPF and Policies LP 10 and	
	LP 18 of the Richmond upon Thames Local Plan (2018).	
	Condition 4: Remediation Strategy	Noted – wording agreed
	No development approved by this planning permission shall	
	commence until a strategy to deal with the potential risks	
	associated with any contamination of the site has been submitted	
	to, and approved in writing by, the Local Planning Authority. This	
	strategy will include the following components:	
	1. A preliminary risk assessment which has identified:	
	• all previous uses;	
	 potential contaminants associated with those uses; 	
	 a conceptual model of the site indicating sources, pathways and 	
	receptors; and	
	 potentially unacceptable risks arising from contamination at the 	
	site.	
	2. A site investigation scheme, based on (1) to provide information	
	for a detailed assessment of the risk to all receptors that may be	
	affected, including those off site.	
	3. The results of the site investigation and the detailed risk	
	assessment referred to in (2) and, based on these, an options	
	appraisal and remediation strategy giving full details of the	
	remediation measures required and how they are to be	
	undertaken.	
	4. A verification plan providing details of the data that will be	
	collected in order to demonstrate that the works set out in the	
	remediation strategy in (3) are complete and identifying any	
	requirements for longer-term monitoring of pollutant linkages,	
	maintenance and arrangements for contingency action.	
	Any changes to these components require the written consent of	
	the local planning authority. The scheme shall be implemented as	
	approved.	
	Reasons	

Topic	Consultee Comment	Applicant Response (14 February 2023)
	To ensure that the development does not contribute to, or is not	
	put at unacceptable risk from, or adversely affected by,	
	unacceptable levels of water pollution in line with paragraph 174	
	of the NPPF and Policies LP 10 and LP 23 of the Richmond upon	
	Thames Local Plan (2018).	
	Condition 5: Verification Report	Noted – wording agreed
	Prior to any part of the permitted development being occupied a	
	verification report demonstrating the completion of works set out	
	in the approved remediation strategy and the effectiveness of the	
	remediation shall be submitted to, and approved in writing, by the	
	local planning authority. The report shall include results of	
	sampling and monitoring carried out in accordance with the	
	approved verification plan to demonstrate that the site	
	remediation criteria have been met.	
	Reasons	
	To ensure that the site does not pose any further risk to human	
	health or the water environment by demonstrating that the	
	requirements of the approved verification plan have been met and	
	that remediation of the site is complete. This is in line with	
	paragraph 174 of the NPPF and Policies LP 10 and LP 23 of the	
	Richmond upon Thames Local Plan (2018).	
	Condition 6: Previously unidentified contamination	Noted – wording agreed
	If, during development, contamination not previously identified is	
	found to be present at the site then no further development	
	(unless otherwise agreed in writing with the Local Planning	
	Authority) shall be carried out until a remediation strategy	
	detailing how this contamination will be dealt with has been	
	submitted to and approved in writing by the Local Planning	
	Authority. The remediation strategy shall be implemented as	
	approved.	
	Reasons	
	To ensure that the development does not contribute to, or is not	
	put at unacceptable risk from, or adversely affected by,	

Topic	Consultee Comment	Applicant Response (14 February 2023)
	unacceptable levels of water pollution from previously unidentified	
	contamination sources at the development site in line with	
	paragraph 174 of the NPPF and Policies LP 10 and LP 23 of the	
	Richmond upon Thames Local Plan (2018).	
	Condition 6: Sustainable Drainage Systems (SuDs)	Noted – wording agreed
	No infiltration of surface water drainage into the ground is	
	permitted other than with the written consent of the Local	
	Planning Authority. The development shall be carried out in	
	accordance with the approved details.	
	Reasons	
	To ensure that the development does not contribute to, or is not	
	put at unacceptable risk from, or adversely affected by,	
	unacceptable levels of water pollution caused by mobilised	
	contaminants in line with paragraph 174 of the NPPF and Policy LP	
	23 of the Richmond upon Thames Local Plan (2018).	
	Condition 7: Piling	Noted – wording agreed
	Piling or any other foundation designs using penetrative methods	
	shall not be permitted other than with the express written consent	
	of the Local Planning Authority, which may be given for those parts	
	of the site where it has been demonstrated by a piling risk	
	assessment that there is no resultant unacceptable risk to	
	groundwater. The development shall be carried out in accordance	
	with the approved details. Reasons.	
	To ensure that the development does not contribute to, or is not	
	put at unacceptable risk from, or adversely affected by,	
	unacceptable levels of water pollution caused by mobilised	
	contaminants in line with paragraph 174 of the NPPF and Policy LP	
	23 of the Richmond upon Thames Local Plan (2018).	
TfL	Provided in letter, dated 3 February 2023.	See Appendix 8.

Application B (ref: 22/0902/FUL)

Topic	Consultee Comment	Applicant Response
Accelar	Response provided in separate document, dated 27 January 2023.	See Appendix 9.
Thames Water	Comments provided in email, dated 16 December 2022	Hoare Lea and Waterman IE preparing a response. This is due w/c 13 February 2023.
TfL	Provided in letter, dated 3 February 2023.	See Appendix 8
Ecology	The Biodiversity Net Gain report (Gillespies dated March 2022) provided covers both sites but should be individual to the site, please redo the calculation and resubmit.	The applications have been considered together as the applications are linked.
	Confusion as to whether the school is going to have a green roof or not as two UGF values have been produced or is the green wall instead of the green roof? Also Z3 School – Proposed roof plan (18125 C645_Z3_P_RF_001) has potential green roof – please confirm, if there is a green roof will it have general access, as it looks like it has play space next to it? It may be that after the individual BNG calculations are done Application B may need a green roof to mitigate for the loss of soft landscaping.	The potential green roof and green wall on the school were labelled as indicative areas which could be provided subject to further sustainability and viability checks by the school operator. The green roof, if provided, would not have general access and there would be some way of dividing it off from the rooftop play area.
		As explained in the Landscape DAS, P79: "Two UGF scores are provided for the school under the below assumptions: 1. The UGF not including a green roof, as the inclusion of the green roof is subject to future detailed design which will be undertaken by the school developer 2. The UGF including the full extent of the potential green roof.
		The school design incorporates a generous rooftop play area for students, next to the

Topic	Consultee Comment	Applicant Response
		area of the potential biodiverse roof. The
		school roof design also provides skylights that
		bring natural light to the levels below."
		The green roof and green wall are potential.
		As a result, they were not included in the
		BNG assessment.
Waste	It would be supported if some space was allocated for food waste	This has been included in the updated
	collection as the council can provide this service free of charge to	OWMP. Please see para. 6.3.3.
	schools.	
Police	Secured by Design –	Noted
	I strongly recommend the below conditions are placed on the	
	development and that the developer follows the latest Secured by	
	Design "New Schools" Guide, a copy of which can be found here	
	www.securedbydesign.com/guidance/design-guides.	
	1. The development shall achieve 'Secured by Design' accreditation	
	awarded by the Design-Out Crime Officer from the Metropolitan	
	Police Service on behalf of the Association of Chief Police Officers	
	(ACPO).	
	2. Prior to first use accreditation will be evidenced as achieved and	
	evidence of such accreditation will need to be submitted and	
	approved in writing by the Local Planning Authority.	
	Design and Layout	Noted
	As already stated we recommend that the Secured by Design "New	
	School Guide" is followed for this development. It is extremely	
	important that schools provide a safe and secure environment. In	
	addition to the staff and student needs schools often house valuable	
	equipment which can be attractive to criminals and this needs to be	
	secured.	
	The shell of the main building will need to be secure with security	Noted
	rated doors and windows where these are accessible. The inner door	

Topic	Consultee Comment	Applicant Response
	allowing access to the school from reception will also need to be	
	security rated as during school opening hours this will need the	
	capability to be locked down.	
	Fencing for the site needs to be effective without being overbearing.	The fence around the sports pitch is a weld
	The 4.5m high weld mesh fence shown in the plans for the sports	mesh fence. The purpose of this is to reduce
	pitch is appropriate for this as it is not easy to scale and does not tend	rattle and ball impact and therefore potential
	to look oppressive. The MUGA has 3m high fencing which would also	noise source. The scale of the fence was
	be appropriate. Of specific concern is the main boundary fence of	discussed and agreed in detail with Sport
	1.2m which is used for the areas of the school to define school	England and the LBRuT EHO as part of the
	grounds from the foot path. Lower heights of fencing (1.2m to 1.6m)	consultation process for the Original Scheme
	are suitable for boundary demarcation and controlling movement	(ref: 18/0548/FUL) (see paragraphs 7.1.16
	only and not for security, the height of security fencing will	and 7.7.9 of the LBRuT committee report, Jan
	generally start at 1.8m and above. This increases the risk of	2020).
	opportunistic theft within the cycle stores which are very close to this	
	low boundary. We recommend that the fence is 2.1m high (a 1.8m	
	high fence could be considered in conjunction with other measures)	
	to minimise the risk of opportunistic thieves being able to easily	
	access the site. A secure boundary will help staff manage the school	
	site by limiting trespass and by channelling visitors to the site through	
	appropriate entrances. A secure boundary will also frustrate the	
	intruder intent on breaking into the school out of hours and or limit	
	the quantity or type of goods that can be stolen.	
	Access gates to the site should be kept to a minimum to allow for	Noted
	these points to be monitored. They should be easily seen via windows	
	of actively used offices (such as reception) within the school. The	
	current plans show some access points to be in locations which would	
	likely be obstructed by bike stores or other buildings. If these gates	
	cannot be moved they should be covered by CCTV which is linked to	
	main reception or a part of the building where they can be monitored.	
	Vehicle access needs to be controlled so that it can be closed off when	Noted
	not in use. The school and its car park could easily become a source of	
	antisocial behaviour if there are no measures in place to reduce this	
	risk.	

Topic	Consultee Comment	Applicant Response
	The bike stores need to have secure stands which allow for bikes to be locked at two points to a secure structure. They should be located in areas where they can be seen by actively used rooms to enhance surveillance. They should be monitored by CCTV cameras which are	Noted. Sheffield stands proposed for bike store which would allow for bikes to be locked at two points.
	linked to the main office. If any of the facilities at the school are intended for community use outside of school hours they need to be designed in such a way so as to enable public access to these areas while keeping the rest of the school secure. The specific design requirements for this would be discussed with the developer prior to construction.	Noted. Outdoor MUGA pitch will be accessible for the community through a specific gate. Indoor facilities including sports hall, lockers and changing room accessible through a separate entrance and separated from the rest of the school.
Police (contd.)	Recommendations I see no reason why all aspects of this development cannot achieve Secured by Design accreditation and as stated above to ensure that the development achieves an element of security for the rationale above I would like to request the following planning conditions if an employee requirement to achieve SBD accreditation has not already been sought; 1. The development shall achieve 'Secured by Design' accreditation awarded by the Design-Out Crime Officer from the Metropolitan Police Service on behalf of the Association of Chief Police Officers (ACPO).	Noted.
	2. Prior to first use accreditation will be evidenced as achieved and evidence of such accreditation will need to be submitted and approved in writing by the Local Planning Authority.	
	These planning conditions are in pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well-being of the area in pursuance of the Council's	

Topic	Consultee Comment	Applicant Response
	powers under section 2 of the Local Government Act 2000 and to	
	ensure the development provides a safe and secure environment in	
	accordance with the London Plan 2021 in Section B of policy D11.	

Appendices

Appendix 1 – Hoare Lea responses to Accelar comments (Application A), dated 10 February 2023 and 'Be Seen' Note, prepared by Hoare Lea, dated 10 February 2023. [Note: Issued to LBRuT on 10 February 2023].

Appendix 2 – Operational Waste Management Plan (Rev F), prepared by Stantec, dated January 2023 and associated plan drawings refs: 38262-5520-07 B and 38262-5520-20 C.

Appendix 3 – Letter to the PLA, dated 25 January 2023.

Appendix 4 – Tree Protection Plan (ref: WIE ZZ XX 7706 P01), prepared by Waterman IE.

Appendix 5 – Michael Grubb revised drawings and drawing schedule.

Appendix 6 – Michael Grubb revised Waterfront Lighting Assessment, dated January 2023.

Appendix 7 – Updated Drainage Strategy and drawing, prepared by Waterman IE – to be issued to LBRuT w/c 13 February 2023.

Appendix 8 – Response to TfL letter, dated 3 February 2023, prepared by Stantec, dated 14 February 2023.

Appendix 9 - Hoare Lea responses to Accelar comments (Application B), dated 10 February 2023 and associated revised School Roof Plan, prepared by Squire & Partners (ref: 18125-SQP-A-C645_Z3_P_RF_001-C). [Note: Issued to LBRuT on 10 February 2023].