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Dear Sarah

Planning Application: 22/3139/FUL – Thames Young Mariners Base, Riverside Drive, Ham, Richmond

Response to Technical Consultees

Vail Williams LLP have been instructed by Surrey County Council to prepare this response letter following the consultee responses received by email on 28th February 2023. This letter provides a non-technical summary of the matters/queries raised by consultees. Where necessary, supplementary/revised technical information has been prepared to address consultee queries. The following documentation should be read in conjunction with this letter:

Report	Reference	Author
Fire Safety Strategy Report Stage 3	November 2022	Osborn Associates
Air Quality Screening Assessment	February 2023	Wardell Armstrong
Dusk Emergence Survey	July 2023	Middlemarch
Ecological Walkover Survey	28th July 2023	Middlemarch
Preliminary Bat Roost Assessment	July 2023	Middlemarch
Badger Survey	July 2023	Middlemarch
Landscape Masterplan	PR-200-PEV-XX-XX-DR-L-00200 Rev P12	Pick Everard
Circular Economy Statement	7 August 2023	Pick Everard
Whole Life Carbon Report	7 August 2023	Pick Everard
Circular Economy Statement	7 August 2023	Excel
Whole Carbon Statement	7 August 2023	Excel
Drainage Strategy	22 June 2023	Atkins

Fire Safety

A consultee response was provided by Trigon on behalf of the Local Planning Authority which raised a number of queries with regard to fire safety. In response to these comments, the Fire Safety Strategy Report Stage 3 has been prepare and submitted for consideration.

The qualifications of the consultants who undertook this report are:

Aleksandrs Trofimovs MEng(Mech), Master of Mechanical Engineering has over 8 years of industry experience. Having successfully delivered projects in the education, health care, residential, commercial, retail, residential and industrial sectors over his career, Aleksandrs has a thorough understanding of the challenges associated with fire safety and has demonstrated expertise in resolving issues using performance-based solutions, including use of computational fluid dynamics.

Subiraj Doraisingam BEng (Mech) MIFireE CEng, Bachelor of Mechanical Engineering and Member of the Institution of Fire Engineers, as well as Chartered Engineer with the Engineering Council UK and Member of the Institute of Mechanical Engineers (IMechE). Subiraj has been working with OAL since 2012. Prior to joining he was successful in leading teams on complex fire engineering projects from concept inception to delivery on-site, including project management to testing, commissioning and handover to the client. Subiraj is a Director responsible for managing and coordinating Osborn Associates' Fire Engineers. Subiraj has wide-ranging experience in fire engineering design of projects from educational establishments, residential buildings and commercial offices, to hotel and manufacturing projects."

With regard to consideration of sprinklers in the buildings. The fire consultant has advised that there is no requirement to provide sprinklers for the buildings of this size and height in ADB Vol. 1 or ADB Vol. 2. The sprinklers were also not proposed as a mitigating measure for any deviations from the code guidance. Therefore, no sprinkler provision was proposed.

Policy Consultee

A query from the Council's policy team was raised with regard to grasscrete and its classification as hard or soft landscaping. It should be clarified that the proposed landscape design proposes the use of a 'Reinforced Grass' system similar to Terram Bodpave 40 or 85 - see below image of reinforced solution. This system has been selected to provide 100% grass seed or turf coverage. The use of 'Grasscrete' as a product solution is not proposed. Not only will reinforced grass solution ensure drainage is unaffected but from a visual perspective, the areas of reinforced grass will appear as areas of grass which reflects the existing situation on site.

Figure 1 - Example of reinforced grass solution for parking area

A query was also raised with regard to the proposed 5m height of the accommodation blocks. The reference to the 5m relates to the top of the buildings' ridge height, the buildings' highest points. Whilst the pitched roofs add height to the residential accommodation blocks, the main mass of the building is only around 3m in height. The decision to incorporate pitched roofs into the design was firstly to ensure the development delivers a high-quality design.

It was felt the proposing all flat roofs on all buildings within the development would be too 'blocky' and would not respond as positively to the surrounding environment. No objection has been raised by the Council's urban design officer with regard to the approach to the development's roofscape. Secondly, the pitched roofs on the accommodation buildings allows for a more sensitive design solution when incorporating the PV array on the pitched roofs as required for the renewable energy provision on site.

With regard to the camping block, this was considered appropriate to be a flat roof design to incorporate opportunities for biodiverse planting as required by Richmond policy along with a PV array. However, due to the sensitive MOL location, it was considered appropriate to screen the PV array and plant at roof level with an additional parapet (which is required for sustainability purposes) so the proposed building does not introduce unnecessary urban features into the site which has an established landscaped character. This approach also ensures the quality of the design of the buildings is not lost through the introduction of required plant. A space between the ceiling level and parapet is necessary for the numerous pipes an ductwork connecting shower and toilet areas back to the heat recovery system of the plant units.

When all aspects are considered a whole and balanced, the proposed accommodation buildings provide the most appropriate response by retaining the buildings as single storey whilst ensuring a high quality design and

opportunities to renewable energy are maximised.

Air Quality Assessment

Following comments received, an Air Quality Screening Assessment has been undertaken and confirms that the redevelopment of the site will not lead to an unacceptable risk from air pollution for existing sensitive receptors and will not lead to any breach of national objectives as required by national policy. Therefore, there are no material reasons in relation to air quality why the proposed scheme should not proceed, subject to appropriate planning conditions.

Ecology

An updated ecological walkover was undertaken in July 2023 in addition to updated bat and badger surveys due to the length of time since previous surveys were undertaken. These have been enclosed with this letter to provide up to date assessments of the relevant protected species on site.

Lead Local Flood Authority

An updated Drainage Strategy has been prepared by Atkins to address comments from the LLFA. A summary of each point which has been responded to is set out below:

1. The drainage features and drainage connections should be shown and labelled clearly on a drainage drawing.- *Drawing provided in Appendix C.2 in the updated strategy report.*
2. The existing (brownfield) runoff rate needs to be supplied. – *The existing runoff rate has been calculated from CCTV data for the existing building. The drainage arrangement for the rest of the site area has not been identified from the CCTV therefore the remaining areas have not been considered for runoff rate calculations. Existing network is assumed to discharge at 20.7l/s without any flow controls applied to the network.*
   Section 3.3.2 has been amended to include these details.
3. Exceedance flow routes should be marked on a drawing*: The exceedance strategy has been marked on the drainage layouts in Appendix E.2 of the report.*
4. The drainage strategy includes the maintenance tasks and frequencies for each SuDS feature. This should also be provided for the Hydrobrake. Information on who will own the maintenance tasks is required*."- The maintenance requirements of hydrobrake have been added in section 4 of the drainage strategy report. The site will remain within the ownership of SCC who will continue to maintain the site and any associated features.*

Environment Agency

Work regarding comments from the Environment Agency is ongoing and a response will be submitted separately to this letter.

Waste

Once development is complete, the site will continue to operate with the same waste collection arrangements

which currently exist for the site. Waste collections take place weekly with general waste collected by RBC on Mondays, recycling collected on Wednesdays and paper/card collected on Thursdays.

Whilst there is currently not an option to schedule collection times because waste is collected by the Council, the collections are infrequent at only 3 times a week and SOLD are able to manage buses and coaches within the site boundary and therefore can ensure that the waste collection vehicle access and turning route is not blocked when coming onto site. Whilst waste collection will take place in a different location as a result of the development, SOLD will continue to operate as existing which does not result in any severe adverse impact on the surrounding highway network.

TFL

The proposals will continue to utilise the existing access arrangements with regard to cyclists. For safety reasons due to the nature of the site operations both the vehicle and pedestrian gates area locked and managed by an intercom system with keypad other than at drop-off and pick-up times.
Staff will have the keypad code for the gate so will be able to cycle through after entering the access code. All visitors to the site will be required to use the intercom system to gain access. Staff will remotely open the gate to allow visiting cyclists (or others) through to the access drive into site.

GLA

Following comments regarding a whole carbon lifecycle assessment and circular economy statement, Pick Everard have prepared these reports for consideration and have been enclosed with this letter.

With regard to urban greening, as confirmed by GLA and Richmond Council the proposals exceed the urban greening factor required by planning policy. The proposals have taken a strong landscape-led approach, incorporating a variety of landscaping throughout the site. The proposals have gone as far as feasibility possible with regard to urban greening. Incorporating further planting into the car parking area will affect the vehicle tracking and potential parking space layout which could result in need to extend the car parking area. The proposed design has sought to keep the areas of developed land as close to the previously developed areas of the site as possible due to minimise the impact of MOL.

In relation to comments regarding mechanical cooling, the applicants Building Physics team have advised, the areas did not pass overheating assessment even when maximising the windows openings because the high level of occupancy. Therefore, cooling was required.

Cycle Parking

Additional cycle parking has been incorporated into the proposals as identified on the updated Landscape Masterplan. This has included provided additional cycle parking under the canopies of each accommodation block.

Daylight and Sunlight

The comments provided in relation to daylight and sunlight have been reviewed by Atkins Building Physic Team and the following responses have been provided:

Comment	Response
Overheating – Is cooling required? - Overheating – some educational and residential spaces require mechanical cooling. This should be avoided where possible such as via glazing design and natural ventilation. Ple confirm if this definitely required	The spaces that fail are due to a combination of high internal gains (i.e. significant number of people) and high proportion of glazing area. In addition they have limited opportunity for opening. As such cooling is required or the façade design amended. All dormitory spaces pass the overheating criteria.
Daylighting – Gatwick justification - The report needs to be updated to provide justification for the use of London Gatwick airport data	Gatwick chosen as per BRE 209 guidance. See Table C3 the BRE 209 document. However, the irradiance data within UK weather files has very little variation.
Daylighting – Have failed spaces been actioned? - The report shows some windows fail the tests and recommends window changes – have these changed been carried out? If not provide justification for why failure is not harmfu o As discussed during the meeting, while some are close to the target others fail b a larger margin. You may wish to consider what the existing values are for comparison of whether the proposed is worse or an improvement on existing values/	The report details results of modelling the current design. Recommendations were provided in the report. Daylighting criteria is intended for guidance, it is not required for compliance. No harmful effects of reduced daylight factor, it will only marginally increase lighting consumption of the spaces.
Daylighting – Plan showing window reference - An appendix to show which windows are located where is required	Report presents results based rooms not per individual windows. Glazing arrangement can be found on architectural elevations.

I trust this provides the necessary clarity and response to the matters raised by consultees but if you have any further queries, please do not hesitate to contact me.

Yours sincerely

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