

Homebase Manor Road, Richmond

Planning Statement Addendum (Consolidated Post Hearing Amendments)

Planning Application ref. 19/0510/FUL (GLA ref. 4795)

September 2023

Contents

1.	Introduction.....	3
2.	Planning Policy Context	7
3.	Planning Assessment	11
4.	Planning Obligations and Community Infrastructure Levy.....	46
5.	Summary and Conclusion.....	48

Appendices

Appendix I Consolidated Document Schedule

Date: 15 September 2023

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 This Planning Statement Addendum ('the Statement') has been prepared by Avison Young on behalf of our client, Avanton Richmond Developments Ltd (the 'Applicant'), in relation to the proposed redevelopment of the Homebase site at 84 Manor Road, North Sheen (the 'Site') sought by Planning Application ref. 19/0510/FUL (GLA ref. 4795) (the 'Application').
- 1.2 This Statement is submitted alongside a package of updated plans and documents which consolidate all changes to the application that have been made since the Mayoral Hearing in October 2020. A final schedule of plans and documents for approval is enclosed at Appendix I.

Background

The Application Development

- 1.3 A planning application for the redevelopment of the Site was submitted to London Borough of Richmond upon Thames ('LBRuT') in February 2019 (ref. 19/0510/FUL) (the 'Application Development'). The Application Development was considered at LBRuT Planning Committee on 03 July 2019. The Planning Committee resolved to refuse the application. However, on 29 July 2019, it was confirmed that the Mayor of London would act as the Local Planning Authority for the purposes of determining the application.

The Revised Proposed Development

- 1.4 Following review of LBRuT's reasons for refusal and discussions with Officers at the Greater London Authority (the 'GLA') and Transport for London ('TfL'), the Applicant revised the proposed development, with the principal aim of increasing the delivery of affordable housing through additional density and enhancing the overall design whilst addressing other issues raised in the Mayor's Stage 2 Report.
- 1.5 Amendments to the planning application proposals (the 'Revised Proposed Development') were submitted to the GLA in July 2020, which increased the number of residential units from 385 to 453. The number of affordable homes was increased by 38 to a total of 173 homes (40% by habitable room, increased from 35% as originally submitted). The increase in units and higher affordable housing provision was principally achieved through amendments to the height and internal layouts in appropriate locations across the scheme.
- 1.6 The Revised Proposed Development was considered at a Mayoral Representation Hearing on 01 October 2020 at which the Mayor of London resolved to grant planning permission subject to the completion of a S106 agreement.

The 2021 Amendments

- 1.7 Following the Mayor's decision, discussions progressed with the GLA and LBRuT to resolve the S106 agreement. Prior to this being resolved the new London Plan was adopted in March 2021 and the revised NPPF was published in July 2021.

-
- 1.8 In order to ensure that the development fully accorded with the new NPPF and London Plan (and to account for other minor matters), further minor amendments were made to the planning application proposals which were submitted to the GLA in November 2021 (the '2021 Amendments'), as follows:
- amendments to the affordable housing tenure split to accord with Policy H6 of the London Plan 2021;
 - minor amendment to the application red line boundary to better reflect the existing title plans, resulting in a slight decrease in the overall site area (768.7 sqm.);
 - consequential amendments to the ground floor landscaping/layout plan to reflect the realigned boundary, including the relocation of the proposed car club spaces and bin holding area; and
 - updates to the transport statement and travel plan for the Site in light of changes to the PTAL rating.
- 1.9 In June 2022, the GLA published an 'Update Report', which concluded that the 2021 Amendments were minor in nature and maintained the resolution to grant planning permission subject to a S106 agreement.

The Current Scheme (September 2023)

- 1.10 In the period since June 2022, discussions have continued between the Applicant, the GLA and other stakeholders. Over the course of this period, there have been further changes to the development plan, planning guidance, and other material considerations. Those pertinent to the planning application are summarised below.
- Publication of LBRuT's Strategic Flood Risk Assessment (2021);
 - Update of the National Planning Policy Guidance including for flood risk and coastal change (2022);
 - Adoption of London Plan Guidance (LPG) documents, including Housing Design Standards LPG, Circular Economy Statements LPG, Whole Life Carbon LPG and Urban Greening Factor LPG (2023);
 - Publication of draft LPG documents, including the draft Fire Safety LPG, draft Affordable Housing LPG and draft Development Viability LPG (2023);
 - Publication of LBRuT Publication Draft Local Plan (Regulation 19) (2023);
 - Revisions to BRE Guidance (Daylight, Sunlight, Solar Glare and Solar Panels) (2022);
 - Adoption of LBRuT's Refuse and Recycling SPD (December 2022);
 - Consultation on amendments to Approved Document B (Fire Safety) including mandating second staircases in new residential buildings over 30 metres (2023);
 - Changes to Building Regulations Requirements (Part L and Part O) and subsequent changes to the GLA Energy Planning Guidance and Carbon Emissions Reporting Spreadsheet (2022); and
 - Announcement of the Government's Long-term Plan for Housing (July 2023).
- 1.11 A review of the planning application has been undertaken by the Applicant in summer 2023 to ensure that the proposed development is compliant with changes to policy/guidance outlined above. This review has identified that further minor changes are required to the Revised Proposed Development

(over and above those made in November 2021) to ensure accordance with the development plan (as it stands today), as follows:

- The introduction of a second staircase in all cores with a height of over 18 metres and associated alternations, including minor reductions in the internal areas of the homes and/or minor increases in the building envelope in inward courtyard facing facades; however, no net loss of units or changes to unit types;
- Minor changes to internal ground floor layouts across all of the Blocks to respond to updated Fire Safety regulations;
- Minor changes to site levels to ensure that the proposal does not lead to detrimental impacts off-site in regards to surface water flooding by revisiting surface water flow routes through the site and incorporating flood resilience measures across the site;
- Subsequent minor reductions to the maximum AOD heights of two of the proposed buildings, in part achieved through reductions to the floor to ceiling heights within the buildings to address the site level changes;
- Associated revisions to the landscaping to accommodate the proposed surface water drainage strategy and to maximise the Urban Greening Factor of the Proposal;
- Minor changes to internal flat layouts across all of the Blocks to respond to the Housing Design Standards LPG;
- Rationalisation of plant at roof levels and associated amendments to roof terraces;
- An updated Energy Strategy for the site with minor revisions to plant area sizes and roof top layouts (detailed in the accompanying DAS Addendum); and
- Revised proposed financial obligations towards transport improvements from the Manor Circus improvement works to improvements to North Sheen Station.

1.12 The above changes have been incorporated with the November 2021 Amendments into a consolidated set of updated plans and documents for approval, as set out in the schedule enclosed at Appendix I.

Purpose of this Statement

1.13 The purpose of this Statement is to explain and assess the changes to the Revised Proposed Development (as set out above) and justify the 'Current Scheme'. It should be read in conjunction with the Planning Statement Addendum (July 2020) which includes a more detailed history of the Application prior to the Mayor's approval of the application.

1.14 It demonstrates that the Current Scheme continues to accord with the development plan and does not significantly differ from the proposals considered by the Mayor in October 2020.

1.15 The Current Scheme continues to deliver a number of significant benefits including the delivery of new homes including affordable, a reduced number of car trips, improvements to air quality associated with a reduction in road traffic emissions, economic benefits and a new high quality public realm.

1.16 This Statement is structured as follows:

-
- **Section 2** identifies changes to the planning policy framework, guidance, regulations and other material considerations relevant to the consideration of the Current Scheme;
 - **Section 3** assesses the application against that framework; and
 - **Section 4** reiterates the draft Heads of Terms to inform the preparation of the Section 106 Agreement and relevant Community Infrastructure Levy information;

2. Planning Policy Context

2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), the planning application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

2.2 This section identifies the changes to adopted and emerging national, regional and local planning policy context as relevant to the determination of the Revised Proposed Development that have occurred since October 2020 (when the application was approved by the Mayor). It should be read in conjunction with the commensurate section of the Planning Statement Addendum (July 2020).

National

2.3 The National Planning Policy Framework (NPPF) was revised in July 2021 and then in September 2023. It continues to set out the government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019. The overarching objective of the planning system, as set out in the NPPF, is to contribute to sustainable development through economic, social and environmental objectives. The 2021 NPPF revised the social objective, so that it now includes the fostering of 'well designed, beautiful and safe places'. It is explicit in that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

The Development Plan

2.4 The Application was originally submitted on 14 February 2019 and the Development Plan for the Site at that time comprised of the following:

- London Plan (2016) (consolidated with amendments since (2011)); and
- London Borough of Richmond upon Thames Local Plan (2018).

2.5 The scheme considered at the Mayoral Representation Hearing in October 2020 was also assessed against the draft policies in the Intend to Publish London Plan (2019), including Directions issued by the Secretary of State (SoS) in March 2020 (as material considerations). The new London Plan was adopted on 2 March 2021 and supersedes the 2016 London Plan.

2.6 LBRuT's Local Plan (2018) remains in place as the adopted local plan. A Publication Draft LBRuT Local Plan ('Emerging Local Plan') has been published with public consultation having commenced on 09 June 2023 and expired 24 July 2023 (Regulation 19 stage). This draft document carries limited weight in the determination of planning applications due to its stage of preparation, the extent of unresolved objections to policies, and as it has not yet been considered at an examination in public and is therefore subject to potential further amendments. Notwithstanding, the Emerging Local Plan is referenced in this document where relevant.

Supplementary Planning Guidance

- 2.7 In February 2022, the Mayor's draft Fire Safety LPG was published and provides guidance on how development proposals should demonstrate compliance with Policies D12 and D5 of the London Plan. This guidance is not yet adopted, and therefore can only be given limited weight in the determination of applications. Additionally, the GLA issued a statement (the 'Position Statement') on fire safety following the publication of the Government's consultation document on proposed changes to Building Regulations, which includes a mandatory requirement for second staircases in buildings over 30 metres in height¹. In July 2023, the Government's Long-term plan for housing confirmed the intention to mandate second staircases in new residential buildings above 18 metres. Whilst the announcement also pointed to the provision of transitional arrangements for current pipeline development, the guidance on this matter has not been developed/published and remains unclear at this time.
- 2.8 In March 2022, the Circular Economy Statements and Whole Life Carbon London Plan Guidance ('LPG') were adopted by the GLA. The guidance applies to developments in London that are referable to the Mayor and introduces new considerations, such as ensuring buildings can be easily dismantled and adapted over their lifetime, and parameters for preparing whole life carbon assessments.
- 2.9 In August 2022, the national Planning Policy Guidance for Flood Risk and Coastal Change ('PPG') was updated to provide a revised approach to considering flood risk matters.
- 2.10 In December 2022, LBRuT adopted the 'Refuse and Recycling: Storage and Access Requirements for New Developments' SPD. The SPD provides detailed guidance on LBRuT's requirements for the storage and collection of solid waste.
- 2.11 In February 2023, the Mayor's Urban Greening Factor ('UGF') LPG was adopted. It provides further guidance on the preparation of UGF assessments.
- 2.12 In May 2023, the draft Affordable Housing LPG and draft Development Viability LPG were published, which will seek to replace the current Affordable Housing and Viability SPG. This guidance is not yet adopted, and therefore can only be given limited weight in the determination of applications.
- 2.13 In June 2023, the Housing Design Standards LPG was adopted. It sets out housing related design guidance and provides a set of standards that relate to housing design.

Other Material Considerations

LBRuT Strategic Flood Risk Assessment

- 2.14 LBRuT published a Strategic Flood Risk Assessment (the 'SRFA') in March 2021. In the SRFA, there are a number of strategic policy recommendations for LBRuT and advice regarding the assessment of planning applications. The SFRA recommends additional requirements for applications to consider including the 1 in 100-year surface water extent Flood Zone 3a (surface water) and flood sequential

¹ <https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/referral-process-lpas#statement-regarding-fire-safety-and-tall-buildings-165593-title>

testing (amongst other measures, see Revised Flood Risk Assessment (2022) and other associated documentation for more details).

BRE Guidance

- 2.15 The BRE Guidelines (Site layout planning for daylight and sunlight: a guide to good practice) were updated in 2022. The updated BRE Guidelines adopt a different assessment methodology based on a more climate-based assessment. This change applies only to internal assessments of daylight and sunlight (i.e. proposed residential units).
- 2.16 Additional guidance relating to solar panels and solar glare has been introduced, setting out recommendations and measures for development to include solar panels, guidelines where additional testing for solar glare may be necessary.

The Government's Long-term Plan for Housing

- 2.17 On the 24th of July 2023, the Government announced its Long-term Plan for Housing². The Prime Minister and Secretary of State for Levelling Up, Housing and Communities have set out further plans for regeneration, inner-city densification and housing delivery across England.
- 2.18 As part of this announcement, the Government set out its aspirations for building safely to be a key priority moving forward and confirmed the intention to mandate second staircases in new residential buildings above 18 metres.
- 2.19 The Government noted that *"this new regulation cannot jeopardise the supply of homes by disrupting schemes that have been planned for years. DLUHC will work rapidly with industry and regulators over the summer to design transitional arrangements..."*. However, such transitional arrangements are yet to be published and remain unclear at this time.

Building Regulations

- 2.20 While Building Regulations requirements are not material planning considerations, the changes to Part L of the Building Regulations and the introduction of a new Part O have resulted in changes to the GLA Energy Planning Guidance and GLA Carbon Emissions Spreadsheet.
- 2.21 Part L of the Building Regulations has been updated to enhance energy performance standards for new buildings, while Part O updates requirements to tackle overheating.
- 2.22 Residential developments are expected to be able to achieve a minimum of 35% on site carbon savings. The updated GLA Energy Planning Guidance introduces an additional percentage improvement benchmark of 50 per cent plus on-site carbon savings that residential developments should be aiming to achieve. Non-residential developments should aim to meet the 35% carbon reduction on site, as a minimum.

² [https://www.gov.uk/government/news/long-term-plan-for-housing#:~:text=Today%20\(24%20July%202023\)%2C,to%20supply%20beautiful%2C%20safe%2C%20decent](https://www.gov.uk/government/news/long-term-plan-for-housing#:~:text=Today%20(24%20July%202023)%2C,to%20supply%20beautiful%2C%20safe%2C%20decent)

-
- 2.23 The updated GLA Energy Planning Guidance has also introduced a requirement for applicants to report the Energy Use Intensity (EUI) and space heating demand of development in order to support energy efficiency targets and protect occupants from high energy bills.
- 2.24 With regards to overheating, dynamic overheating using CIBSE guidance will continue to be required as part of the energy strategy, accounting for the limits that Part O (2021) places on the choices available when undertaking a CIBSE assessment.
- 2.25 Whilst the proposed changes to Part B of the Building Regulations have undergone consultation, they have not been adopted at this time. The changes consulted included the introduction of a second staircase in all new residential buildings which comprised a height of 30 metres or more (measured from the lowest ground level to the finished floor level of the highest residential floor).
- 2.26 The intention of the changes is to ensure that new residential buildings achieve an appropriate level of safety by reducing the possibility of conflict between emergency responders entering a building and those escaping, reducing the risk of smoke ingress into an 'escape' stairwell and providing an alternative means of escape in the event that one route becomes filled with smoke.

3. Planning Assessment

- 3.1 This Section assesses the Current Scheme (i.e. incorporating all of the consolidated changes to the Revised Proposed Development) against any relevant updated policy and guidance since the Revised Proposed Development was considered at the Mayoral Representation Hearing in October 2020).
- 3.2 This Section does not seek to replicate the full planning policy assessment contained within the July 2020 Planning Statement Addendum. Instead, the analysis summarises the position at the Mayoral Hearing in 2020, highlights key policy / guidance updates since the Hearing, and assesses the proposals against the latest policy context, identifying any areas which have resulted in minor scheme revisions. For example, in reviewing updated technical flood requirements there have been resulting minor updates to the scheme design. Refer to the Revised DAS Addendum (September 2023) and Revised DAS Landscape Addendum (August 2023) for a summary of all design changes since October 2020.
- 3.3 As there have been no changes to the adopted LBRuT Local Plan, this Section does not consider the proposal against LBRuT Local Plan policies.
- 3.4 However, the LBRuT have begun preparation of a Draft Local Plan since the Revised Proposed Development was considered by the Mayor in 2020. Whilst the Draft Local Plan has progressed through Regulation 19 consultation, it carries limited weight in the determination of planning applications due to its stage of preparation, the extent of unresolved objections to policies, and as it has not yet been considered at an examination in public and is therefore subject to potential further amendments. The draft policies of the Draft Local Plan are referenced where relevant.
- 3.5 For completeness, all key planning topics are considered in this section (where no changes are proposed this is identified in the relevant section and at **Appendix I**):
- Principle of Development;
 - Commercial Use;
 - Residential Use;
 - Affordable Housing;
 - Fire Safety;
 - Residential Quality;
 - Flooding and Drainage;
 - Design, Townscape and Visual Impact;
 - Public Realm and Landscape;
 - Heritage and Archaeology;
 - Access and Transport;
 - Energy and Sustainability (including Circular Economy and Whole Life-Cycle Carbon);
 - Ecology;
 - Arboricultural Impact;

-
- Air Quality;
 - Noise & Vibration;
 - Wind Microclimate;
 - Daylight, Sunlight and Overshadowing; and
 - Health Impact.

Principle of Development

Summary of Position at Mayoral Hearing

- 3.6 Paragraph 129 of the Mayoral Hearing Report dated 1 October 2020 (the 'Hearing Report') concludes that the residential-led mixed use redevelopment of the site would make a significant contribution towards housing and affordable housing targets for the borough and wider London area and provide complementary commercial floorspace and new, high quality public realm. The Revised Proposed Development was found to be consistent with national, regional and local policies and therefore in accordance with the development plan.

Summary of Relevant Policy/ Guidance Changes

- 3.7 Since the Mayoral Hearing (the 'Hearing'), key changes to relevant policy for this topic are the adoption of the 2021 London Plan and updates to the NPPF.
- 3.8 The Intend to Publish London Plan (2019) was considered as part of the Hearing Report (including relevant SoS Directions) and the policies considered included H1, SD1, E9, S1, S2 and S3. These policies are consistent with policies H1, SD1, E9, S1, S2 and S3 of the adopted London Plan.
- 3.9 The relevant sections of the NPPF (2023), particularly Section 5, remain consistent with the 2019 NPPF.
- 3.10 Policy 2 of the Draft Local Plan seeks to ensure that growth is delivered in a sustainable way and that development prioritises previously developed land. Policy 10 of the Draft Local Plan sets out an aspiration to exceed the strategic target for housing delivery in the Borough (4,110 homes over 2019/20 to 2028/29). Site Allocation 29 intends to allocate the Homebase, Manor Road site for residential-led redevelopment with a flexible range of uses, including retail, office and community/social.

Planning Assessment

- 3.11 The Current Scheme is consistent with the policies of the 2021 London Plan and 2023 NPPF. There have been no material changes from the policies of the Intend to Publish London Plan and 2019 NPPF that would deem the principle of a mixed-use development, which optimises the brownfield Site, unacceptable.
- 3.12 Although the Draft Local Plan carries limited weight at this time, the Current Scheme is consistent with the aspirations to deliver significant housing in the Borough through the use of previously developed land and the comprehensive residential-led redevelopment of the Site proposed by site allocation ref. 29.

-
- 3.13 The Current Scheme proposes a small increase in the overall gross internal area in order to accommodate the space required for second staircases (as required to ensure the highest standards of fire safety). However, it continues to deliver 453 homes and 495 sqm commercial floorspace; the same quantum of development considered at the 2020 Hearing and concluded to be acceptable by the Mayor.

Commercial Use

Summary of Position at Mayoral Hearing

- 3.14 Paragraph 111 of the Hearing Report identifies that the Revised Proposed Development would result in the loss of the existing buildings on site, containing approximately 5,000 sqm of retail floor space; and was deemed to be acceptable as the policy position does not seek to protect such uses outside of certain centres.
- 3.15 The delivery of 495 sqm of flexible commercial uses close to the North Sheen Railway Station was considered to be appropriate in scale for the area, whilst also increasing activation along Manor Road.

Summary of Relevant Policy/ Guidance Changes

- 3.16 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan and the publication of the revised NPPF.
- 3.17 Policy E9 of the Intend to Publish London Plan was considered in the Hearing Report. Specifically, paragraph 107 identifies that the policy seeks to prioritise retail development in town centres. Policy E9 of the adopted London Plan continues to prioritise retail development in town centres. In addition, it states development proposals should manage out of centre retail by 'encouraging comprehensive redevelopment for a diverse mix of uses to realise their full potential for housing intensification'.
- 3.18 The NPPF (2023) retains the same principles in respect of main town centre uses in respect of the sequential and impact approach.
- 3.19 Site Allocation 29 of the Draft Local Plan supports a flexible range of non-residential uses, including retail, office and community/social, as part of residential-led redevelopment.

Planning Assessment

- 3.20 The Current Scheme still results in the loss of out-of-centre retail floorspace.
- 3.21 A detailed survey of the existing retail premises, following the recent departure of Homebase from the premises, confirms that the accurate total existing gross internal area is 5,280.7 sqm. The Application Form and CIL Forms have been revised accordingly to reflect the confirmation of the existing floorspace quantum. Whilst there is a slight increase to the existing floorspace considered at the Hearing, this is not material to determining the acceptability of its loss (noting it is out-of-centre retail floorspace which is not protected through planning policy).
- 3.22 The Current Scheme will deliver 495 sqm of flexible retail/community/office floorspace (the same as the proposals considered at the Hearing in 2020) and will continue to deliver flexible commercial uses considered to be more appropriately scaled for the area.

-
- 3.23 The latest policies and updated existing floorspace quantum do not result in any material changes to the proposals when considering the acceptability of commercial uses. The Current Scheme continues to be acceptable in principle.

Residential Use

Summary of Position at Mayoral Hearing

- 3.24 Paragraph 120 of the Hearing Report identifies that the NPPF requires significant weight to be given to the value of developing brownfield land in meeting housing need. The Hearing Report identifies the Revised Proposed Development would optimise the residential capacity of the site and would make a significant contribution towards achieving the Council's housing targets and meeting a strategic pan-London need for conventional and affordable housing by providing 453 new homes, including 173 affordable units. The Hearing Report concluded that the Revised Proposed Development would therefore accord with the NPPF (2019), the London Plan (2016) and the Intend to Publish London Plan (2019).

Summary of Relevant Policy/ Guidance Changes

- 3.25 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan.
- 3.26 Policy H1 has been subject to revisions between the Intend to Publish and Adopted London Plans. However, these changes relate to housing targets and build out rates only (which are not relevant to considering the acceptability of the planning application).
- 3.27 Policy H1 encourages development on appropriate windfall sites not identified in Development Plans through the plan period and encourages optimisation of the potential for housing delivery on all suitable and available brownfield sites, especially sites with existing PTALs of 3-6 and low density retail parks or car parks.
- 3.28 There have been no material changes to Section 5 of the NPPF between the 2019 and 2023 versions. Accordingly, the Current Scheme would continue to comply with the NPPF.
- 3.29 Policy 10 of the Draft Local Plan sets out an aspiration to exceed the strategic target for housing delivery in the Borough (4,110 homes over 2019/20 to 2028/29). Site Allocation 29 of the Draft Local Plan intends to allocate the Homebase, Manor Road site for residential-led redevelopment and therefore supports the principle of residential uses at the site.
- 3.30 More up-to-date evidence regarding housing delivery in LBRuT has been published since the Hearing in 2020. LBRuT's Housing Annual Monitoring Report (July 2022) outlines that as of 1 April 2021, 206 dwellings had been delivered over the 2020-2021 financial year period. This represents the lowest number of completions since 2011. Furthermore, only 17 affordable housing units (8% of total delivery) were delivered over 2020-21. The annual delivery fell well below the 2015 London Plan target of 315 homes per annum and the 2021 London Plan target of 411 homes per annum. Accordingly, the delivery of homes and affordable homes in the Borough has worsened since the Hearing.

Planning Assessment

- 3.31 Policy continues to support the provision of residential development and the optimisation of the potential for housing delivery on all suitable and available brownfield sites. The Current Scheme comprises redevelopment of an under-utilised brownfield site to deliver 453 new homes in an accessible urban location and therefore complies with latest policy and guidance.
- 3.32 Furthermore, LBRuT's most up to date (2022) Housing Annual Monitoring Report continues to show a persistent under-provision of new affordable homes in the borough. The Current Scheme comprises 173 affordable housing units (40% by habitable room) and would therefore make a significant contribution towards affordable housing delivery in the Borough and meeting London wide needs for affordable housing.

Affordable Housing

Summary of Position at Mayoral Hearing

- 3.33 Table 6.1 below identifies the unit size mix considered at the Hearing. Of the total affordable housing proposed, 52% was proposed to be low-cost rent (London Affordable Rent) and 48% intermediate products (21% Shared Ownership and 27% London Living Rent).
- 3.34 The provision of 40% affordable housing assumed the receipt of the GLA grant.

Tenure	Unit size			Affordable Percentage		Total	
	1-bed	2-bed	3-bed	By unit	By habitable room	Units	Habitable Rooms
London Affordable Rent	20	49	15	49%	52%	84	247
Shared Ownership	1	33	0	20%	21%	34	101
London Living Rent	36	19	0	31%	27%	55	129
Total	57	101	15	100%	100%	173*	477**
						* 38% of scheme by unit	
						** 40% of scheme by habitable room	

Table 6.1: Affordable Housing Offer (July 2020)

- 3.35 Paragraph 150 of the Hearing Report stipulated that the affordable housing offer of 40% by habitable room was strongly supported and complied with the GLA's Fast Track Route. It noted that the tenure split accords with the requirements set out in the Intend to Publish London and the affordability levels proposed under each tenure would comply with the relevant standards set by the NPPF, the London Plan (2016) and the draft Policy H5 of the Intend to Publish London Plan.

Summary of Relevant Policy/ Guidance Changes

- 3.36 Since the Hearing, key change of relevance is the adoption of the 2021 London Plan.
- 3.37 Policy H5 of the London Plan sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable and requires developments to provide affordable housing through the threshold approach, using grant to increase affordable housing delivery beyond the level that would otherwise be provided.

-
- 3.38 Policy H6 of the London Plan sets a target split for affordable housing products. It requires a minimum of 30% of homes to be low-cost rent (London Affordable Rent or Social Rent) and a minimum of 30% intermediate products which meet the definition of genuinely affordable housing (i.e. London Living Rent and London Shared Ownership). The remaining 40% can be determined by the borough as low-cost rented homes or intermediate products based on identified need.
- 3.39 The draft Affordable Housing London Plan Guidance ('LPG') and draft Development Viability LPG were published in May 2023. Both seek to provide additional guidance on affordable housing and viability assessments to seek to ensure that developments assessed through the planning system maximise affordable housing delivery.
- 3.40 There have been no material changes to Section 5 of the NPPF between the 2019 and 2023 versions.
- 3.41 Policy 11 of the Draft Local Plan requires new developments in the Borough to provide at least 50 per cent of the total number of habitable rooms as affordable housing on site. If the minimum level of affordable housing is not provided on site, an application for development will be refused, and site-specific viability information will only be accepted in exceptional circumstances.

Planning Assessment (including confirmation of position re. GLA Grant Funding)

- 3.42 In November 2021, changes were proposed to the affordable housing offer to ensure that it would comply with Policy H6 of the London Plan (2021). The revised tenure split will deliver 40% affordable housing by habitable room with a tenure split of 70:30 (LAR:INT) for the first 35%, with the remaining 5% met through additional shared ownership homes.
- 3.43 The GLA Update Report (June 2022) (prepared in response to the November 2021 Amendments) confirmed that the revised affordable housing offer required full use of Mayoral grant funding and was therefore based on the inclusion of grant at £28,000 per unit for intermediate products and £60,000 per London Affordable Rent Unit. The total grant figure identified was c.£8.14 million.
- 3.44 The Applicant seeks to clarify the position regarding the affordable housing offer and its relationship with, or apparent reliance on, GLA grant funding. The application as originally submitted in 2019 proposed 35% affordable housing and was not predicated on securing grant funding (35% being the relevant threshold level of affordable housing required to follow the Fast Track Route). When the Application was called in by the Mayor for his determination, the affordable housing offer was increased to 40% using Mayoral grant funding, in line with Intend to Publish London Plan Policy H5, which required developers seek grant funding to increase the level of affordable housing.
- 3.45 The affordable housing offer set out in the draft S106 Agreement (which was published alongside the GLA Update Report in June 2022), provides for an absolute requirement to deliver 40% affordable housing (by habitable room) on site. This requirement is not wholly predicated on the ability to secure GLA grant funding, and there are no provisions within the S106 Agreement relating to GLA grant funding.
- 3.46 In addition, the S106 agreement allows for further improvements to the affordable housing tenure split should Council grant funding be available in the future.

3.47 The updated tenure split results in the revised unit mix shown in Table 6.2. The changes (since the Hearing) involve 18 of the London Living Rent units switching to London Affordable Rent. The affected units are located in Building C (Core C). There is no change to the total amount or unit mix of the affordable homes proposed in the Current Scheme relative to the Revised Proposed Development considered at the Mayoral Hearing.

	Mix as per October 2020 Hearing		Revised Mix (November 2021)	
	(Units)	(Hab Rooms)	(Units)	(Hab Rooms)
Shared Ownership (SO)	34	101	34 (no change)	101 (no change)
London Living Rent (LLR)	54	126	36 (-18)	83 (-43)
London Affordable Rent (LAR)	85	250	103 (+18)	293 (+43)
TOTAL	173	477	173	477

Table 6.2: Affordable Housing Offer (November 2021)

3.48 The units do not overlap with those identified in the draft Section 106 agreement, which are to change tenure if Council Grant Funding is made available. The units identified in the draft Section 106 agreement whose tenure could change if Council Grant Funding is made available are market units in Block A (Core AA), which have the potential to be provided as either London Affordable Rent or Shared Ownership units, and the London Living Rent units in Block C (Core CA), which could be provided as London Affordable Rent units.

3.49 Whilst the Draft Affordable Housing LPG notes a preference for Social Rent units above all other affordable housing products, the LPG is in draft form and carries limited weight. Policy H5 of the London Plan allows both social rent and LAR tenure noting that a minimum of 30% of the affordable housing should be provided as social rent or LAR. Accordingly, the provision of LAR units complies with Policy H5 of the London Plan.

3.50 It is also acknowledged that under the GLA's latest Homes for Londoners: Affordable Homes Programme 2021 – 2026, LAR homes are no longer eligible for grant funding. As noted, the proposal does not rely on grant funding to deliver 40% affordable housing. Furthermore, LBRuT latest Guidance on its Affordable Housing SPD notes that the social rent levels will be applied to planning applications validated on or after 1 April 2023. Noting that the application was validated by LBRuT on 01 March 2019, it falls well outside of this timeframe. The provision of LAR is therefore appropriate, taking account of the timescales associated with this application.

3.51 The introduction of a second staircase in the Blocks has been achieved by improving the efficiency of the core and/or minor increases in the building footprints (considered further in the Design, Townscape and Visual Impact section below). Accordingly, there have been no changes to the total number of units proposed or the unit type. Whilst there is a small reduction in the square meterage of some units, all of the units continue to comply with the minimum space standards for their type as set out within Policy D6 of the London Plan. As the total number of units and unit mix has not been amended, there are no subsequent impacts upon the affordable housing offer.

-
- 3.52 There are no further changes proposed as part of the Current Scheme relative to the affordable housing offer contained in the November 2021 Amendments. Therefore the findings of the GLA Update Report remain valid.
- 3.53 Although the Draft Local Plan seeks to refuse applications for housing development that do not provide 50% affordable housing (by habitable room) on site, this is not in general conformity with the London Plan and should therefore be afforded limited weight in decision making at this time.

Fire Safety

Summary of Position at Mayoral Hearing

- 3.54 The Revised Proposed Development was supported by a Revised Fire Safety Statement (2020). The Hearing Report found the Revised Proposed Development to comply with Policies D5 and D12 of the Intend to Publish London Plan, and secured details of the fire strategy of the buildings by planning condition.

Summary of Relevant Policy/ Guidance Changes

- 3.55 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan, the publication of the draft Fire Safety London Plan Guidance, revisions to Building Regulations and the Government's announcement of the Long-term Plan for Housing.
- 3.56 Policy D5 of the London Plan requires developments to be inclusively designed and states that buildings should be designed and built to accommodate robust emergency evacuation procedures for all building users, including those who require level access. This is consistent with Policy D5 of the Intend to Publish London Plan.
- 3.57 Policy D12 of the London Plan requires development proposals to achieve the highest standards of fire safety and for all major development proposals to be submitted with a Fire Statement which details how the development would function in terms of materials, means of escape, features to reduce risk to life, access for fire personnel, space for fire appliances and potential future modifications. This is consistent with Policy D12 of the Intend to Publish London Plan.
- 3.58 The draft Fire Safety LPG was published in February 2022. It sets out the way in which fire safety information should be submitted and when specific measures (i.e. evacuation lifts) are required in new development proposals.
- 3.59 Additionally, the Department for Levelling Up, Housing and Communities undertook consultation between 23 December 2022 and 17 March 2023 pursuant to options to revised Approved Document B (Fire Safety) of the Building Regulations. Whilst it is noted that Building Regulations are not planning policy, they are important considerations for the deliverability of development proposals and ensuring the implementation of good practice safety.
- 3.60 The consultation included options to introduce clear guidance in Approved Document B recommending the provision of a second staircase above a certain height. This provision is set at 30 metres, measures from the lowest ground level to the finished floor level of the highest residential floor. The intention is to ensure that new residential buildings achieve an appropriate level of fire safety and provide adequate means of escape for occupiers. The GLA's Position Statement sets out

strong support for the requirement of a second staircase in buildings over 30 metres in height and mandates the provision of two staircases in such buildings.

3.61 Policy 45 of the Draft Local Plan will require development to achieve the highest standards of fire safety in accordance with London Plan Policy D12, and will require all residential development over 30 metres in height to be designed with two stair cases.

3.62 The Government's announcement of the Long-term Plan for Housing (July 2023) confirms intentions to mandate the provision of a second staircase in all buildings over 15 metres in height. Whilst the announcement also references the provision of transitional arrangements for pipeline development, guidance relating to this is yet to be developed and/or published and remains unclear.

Planning Assessment

3.63 A Revised Fire Safety Statement (August 2023) has been submitted alongside the Current Scheme to demonstrate compliance with the requirements of Policies D5 and D12 of the London Plan and the draft Fire Safety LPG. In addition, all Blocks have been revised to incorporate a second staircase pursuant to the Government's announcement of the Long-term Plan for Housing and ensuring the Current Scheme meets the highest standards of fire safety.

3.64 Second staircases have been introduced in the proposed blocks through improving the efficiency of the core and minor increases in the building envelope (refer to Design, Townscape and Visual Impact Section below) and the Current Scheme has been able to maintain a total of 453 residential units. There are some reductions in the size of some of the homes, however, all units maintain compliant with the space standards set out in Policy D6 of the London Plan and continue to provide a good quality of living accommodation.

3.65 The second staircases will be fitted with their own dry riser and ventilation shaft, thereby completely isolated from the first staircase in terms of a means of escape. The revised Fire Safety Statement sets out the Current Scheme's compliance with the aspirations of the proposed changes to Approved Document B and the Government's Long-term Plan for Housing.

3.66 As a result of the introduction of the second staircase and updated policy and guidance, minor alterations to the ground floor layouts of buildings have been incorporated into the scheme. This involves revised door locations, introduction of corridors to allow for enhanced means of escape and the conversion of some residential lobby areas to external undercroft spaces. The introduction of a second staircase and other minor alterations have resulted in a small reduction of residential floorspace. A full summary of associated design changes relating to fire safety is provided in the Revised DAS Addendum (September 2023). These are very minor internal design changes which provide enhanced safety and do not materially affect the proposals as a whole.

3.67 The Current Scheme has also been subject to consultation with HSE through their pre-planning advice service. HSE noted that concerns would be raised in relation to the connection of single stair cores to ancillary areas (bin and bike stores and plant areas) which has been addressed.

3.68 Since the HSE's feedback, the Government announced its Long-term Plan for Housing and the intention to mandate second staircases in all buildings over 15 metres. In order to ensure that the

Current Scheme delivers the highest standard of fire safety, all buildings have been amended to incorporate two stairs.

3.69 In light of these changes, a revised Fire Safety Statement (August 2023) has been prepared to demonstrate the Current Scheme complies with the latest fire safety requirements.

Residential Quality

Summary of Position at Mayoral Hearing

3.70 The Hearing Report considered the Revised Proposed Development against the Intend to Publish London Plan, specifically policy D6. It found that all units would benefit from good quality accommodation and private amenity space, with regard to privacy, light and outlook.

Summary of Relevant Policy/ Guidance Changes

3.71 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan.

3.72 With regards to the quality of housing developments, the key requirements of Policies D5 and D6 of the London Plan remain consistent with draft Policy H6 of the Intend to Publish London Plan.

3.73 There have been no material changes to the NPPF that would affect the consideration of this topic.

3.74 Policy 13 of the Draft Local Plan will seek for all new housing development to comply with the Nationally Described Space Standards and for private internal space and minimum floor to ceiling heights to comply with Policy D6 of the London Plan. It also resists new homes significantly above the minimum standard that do not make efficient use of land.

3.75 The Housing Design Standards LPG introduces a range of requirements and guidance to ensure new housing proposals are well-designed and provide a good quality homes.

Planning Assessment

3.76 The Current Scheme continues to comprise high quality residential accommodation. All units have been designed to meet or exceed the minimum internal space standards and the minimum private and communal external space standards in accordance with adopted policy.

3.77 The Current Scheme does not propose any changes to the unit mix relative to the November 2021 Amendments.

3.78 The Revised DAS Addendum (September 2023) identifies the changes to the layout of the blocks in terms of the addition of a second staircase and the internal layout of some of the units. These changes are summarised as follows:

- The introduction of second staircases achieved through improving efficiency of the core, marginal reductions in square meterage of the residential units (as set out in table 6.3 below for Block B) and/or a minor increase in the building envelope of the building;
- Minor alterations to the internal layout of the residential units;

- Revised access arrangements for 1x ground floor unit in Core AC (unit ref. AC-G-02) to allow for direct access from the Manor Road frontage, echoing the other homes proposed along the street;
- Insertion of additional doors to isolate fire exit routes;
- Alterations to layout to provide solely external access to amenities (bike and bin stores); and
- Throughout all blocks, external undercrofts have been introduced to replace internal residential lobbies and additional corridors introduced to accord with fire safety requirements relating to means of escape.

Internal Space Standards

- 3.79 Two staircases has been implemented in all cores with a height of more than 15 metres between the ground level and the floor level of the highest floor containing residential uses. A second staircase has been introduced in Block B, Core D of Block A and Core B of Block D whilst Cores B and C of Block C have been merged to create a single core with access to two staircases.
- 3.80 The introduction of the second staircases has been accommodated through improving efficiencies in the plan layouts (i.e. circulation areas, position of risers) and through small enlargements in the building footprint (as discussed elsewhere in this Statement). Overall, the residential floorspace across the development has increased by 280 sqm.
- 3.81 Whilst the overall residential gross internal area has increased across the development relative to the Revised Proposed Development (July 2020 Proposals), there have been small reductions in the square meterage of some of residential units in order to optimise the Blocks. Table 6.3 demonstrates the extent of changes for Block B (as the only vertically stacked Block).

Unit	Unit Type	GIA – October 2020 Scheme (sqm)	GIA – Current Scheme (sqm)	GIA Reduction (sqm)
<i>Ground Floor</i>				
BA-G-01	1 bed – 2 person	52.0	51.5	-0.5
BA-G-02	2 bed – 4 person	74.3	72.7	-1.6
<i>All Other Floors</i>				
BA-X-01	1 bed – 2 person	52.0	50.3	-1.7
BA-X-02	2 bed – 4 person	74.3	72.7	-1.6
BA-X-03	2 bed – 4 person	74.3	73.5	-0.8
BA-X-04	1 bed – 2 person	52.0	50.3	-1.7
BA-X-05	2 bed – 4 person	74.3	73.2	-1.1
BA-X-06	2 bed – 4 person	74.3	73.3	-1

Table 6.3: Square Meterage Reductions in Block B

- 3.82 As shown in figure 6.3, the reductions in unit square meterage are generally less than 2sqm for each affected flat and all of the proposed residential units continue to comply with the minimum space standards for their type as set out in policy D6 of the London Plan, and therefore continue to provide high quality living accommodation.

3.83 Following the implementation of changes associated with the provision of two staircases in all cores over 15 metres, the residential units were reviewed against the standards set out in the Housing Design Standards LPG. The review identified that a number of the living/kitchen/dining areas did not comply with the minimum space standards set out in the LPG. As such, minor alterations have been made to the layout of some units (i.e. alterations to the positions of internal walls) to ensure that all of the living, kitchen dining areas and bedrooms meet the space standards set out in the LPG.

Impacts of the Increases in the Building Footprints

3.84 The proposed minor increases to the building footprints do not result in any material significant impacts upon the quality of the proposed residential units. Whilst the distances between blocks reduces marginally (up to 50cm at the most (between Core D of Block A and Core B of Block B)), the changes would not be perceptible in the overall context of the massing and do not have any material impacts on the siting or relationship of blocks with one another.

3.85 The largest increase in footprint (to Block A Core A) is 40cm on the internal southern elevation of Block A. Due to the increase along an internal elevation, and the oblique angle of this façade relative to other windows, any significant impacts in terms of light, privacy and outlook will be minimised. Adequate distances between facing flanks and a good level of privacy are maintained.

Communal Roof Terraces

3.86 The position of the roof terraces has been reviewed to ensure appropriate access and wind microclimate conditions to the communal external amenity areas. This has been balanced against competing demands for the roof space in terms of plant space and green roof cover.

3.87 The former floor and roof plans did not provide for any access onto the roof terraces. The Current Scheme provides access doors on to the roof terraces of Blocks A, C and D. Doors have been introduced in lieu of former floor to ceiling height glazing, thereby representing minimal visual impact.

3.88 The Wind Microclimate Assessment (2020) found that the seating areas of the roof terraces of Blocks A, C and B would have little shelter from the prevailing south-westerly wind. In order to ensure appropriate wind conditions for users, the arrangement of the roof terraces of Blocks A and C, which will be affected by south-westerly winds, have been located northward.

3.89 However, it has not been possible to maintain the provision of a communal roof terrace on Block B. Block B has the smallest roof area of the development blocks and has been amended in the Current Scheme to incorporate a second staircase, rearrangement of the stair core, lifts and plant and providing a threshold biodiverse roof cover to meet UGF requirements. Due to the competing interests and the provision of a second staircase, there was insufficient space available to accommodate a usable and climatically comfortable roof terrace. The communal roof terrace on Block B has therefore been removed.

3.90 Whilst the loss of the Block B roof terrace constitutes a reduction in the communal amenity space available to residential users of the development, there is no minimum policy threshold set out within the LBRuT Local Plan or London Plan for the provision of communal amenity areas (with the exception of communal play space) in residential developments. All of the residential units continue to benefit from access to private amenity space across the development. As such, the loss of the roof terrace to

Block B would not be harmful to the overall living conditions of future occupiers, particularly as they would retain access to their private amenity areas and the extensive, high quality, soft landscaped areas and communal play space at grade.

Flooding and Drainage

Summary of Position at Mayoral Hearing

- 3.91 The Flood Risk Assessment (the 'FRA') submitted with the Revised Proposed Development assessed the residual risk of flooding due to surface water and groundwater, and flood resilience and emergency planning measures were incorporated to manage the risks. The FRA recommended a detailed drainage design to secure draining to soakaways and not connect to the surface water sewers, a surface water drainage strategy using blue and green roofs, and attenuation and infiltration tanks to manage surface water on site. The Hearing Report concluded these measures would ensure surface water management on site and would avoid downstream flood risk. A condition for detailed drainage design was included in the Draft Decision Notice.
- 3.92 With regards to drainage, the drainage strategy for the site provided an assessment of existing runoff rates, greenfield runoff rates and require attenuation storage for a range of post development discharge rates. The surface water drainage strategy addressed the Drainage Hierarchy and was considered to comply with policy SI 13 of the Intend to Publish London Plan and LBRuT Local Plan policies.

Summary of Relevant Policy/ Guidance Changes

- 3.93 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan, updates to the NPPF, the publication of the LBRuT Strategic Flood Risk Assessment and the updates to the NPPG (Flood Risk and Coastal Change).
- 3.94 The NPPF seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk. It requires a sequential, risk-based approach to the location of development, taking into account all sources of floor and the impacts of climate change. Furthermore, it seeks to ensure that flood risk is not increased elsewhere as a result of development. This is consistent with the 2019 NPPF.
- 3.95 The NPPG for flood risk and coastal change was updated in 2022 to adhere to the latest policy position on flood risk introduced in the 2019 and 2021 NPPF.
- 3.96 Policy SI 12 of the London Plan seeks to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat. This is consistent with the Intend to Publish London Plan.
- 3.97 Policy SI 13 of the London Plan states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its sources as possible. The Mayor's drainage hierarchy should be followed, with a preference for green over grey features. This is consistent with the Intend to Publish London Plan.

-
- 3.98 The LBRuT Strategic Flood Risk Assessment (the 'SRFA') (2021) introduces a number of strategic policy recommendations for LBRuT as well as recommendations for the consideration of flood risk matters relating to the determination of planning applications.
- 3.99 Policy 8 of the Draft Local Plan requires that all developments are safe for their lifetime and clearly demonstrate that they avoid, minimise or reduce contributing to all sources of flooding. Additionally, development will be guided to areas of lower risk by applying the 'Sequential Test'.
- 3.100 A summary of the key changes of relevance to the proposals is provided in new / updated reports relating to flood matters including: the Updated FRA (March 2023), Flooding Sequential Test (2022), Flood Evacuation Management Plan (March 2023), Hydrological and Hydraulic Modelling Report (March 2023), Drainage Strategy (May 2023), Basement Screening and Impact Assessment (February 2023).

Planning Assessment

Sequential Test

- 3.101 A Sequential Test has also been carried out by Hydrock to demonstrate that a sequential risk-based approach has been followed. The policy requirement to steer new development towards areas with the lowest risk of flooding, requires an analysis of comparable sites. The Sequential Test identifies a range of potential sites, informed by a review of the LBRuT Local Plan, Monitoring Report and Five-Year Housing Land Supply. The potential sites have been narrowed down to four comparable sites based on similar size (approximately 2ha) and allocation for predominantly residential development: Kneller Hall, Friars Lane Car Pak, Sainsburys Lower Richmond Road and Sainsburys Hampton. The shortlisted sites are not considered suitable alternatives to accommodate the proposed development due to the reasons set out in the accompanying Sequential Test.

Flood Risk

- 3.102 As a result of the policy changes identified above, there is a greater policy impetus to ensure the development will not cause an increase in flood risk off-site. Whilst this used to be criteria for flooding as a result of fluvial sources, the latest guidance has now expanded this to all forms of flooding, including surface water sources. This represents an update from the policy position at the time of the Hearing and, as such, additional analysis and assessment work has been carried out for robustness.
- 3.103 The Updated FRA (2023) provides a detailed assessment of the potential surface water flood risk and identifies the site as Flood Zone 3a for surface water flooding. The Flood Warning and Evacuation Plan outlines includes mitigation measures within the site to ensure that the site users are safe from flooding in accordance with the requirements of Policy SI 12 of the London Plan. This includes the provision of safe refuge areas for all of the blocks.
- 3.104 The latest Environment Agency ('EA') mapping shows the development contains a surface water route, with flows entering the site in the south-west corner and flowing north through the site and beyond. Given the need to ensure development does not result in detrimental impact off-site, and to ensure surface water volumes are compensated for where storage volumes are lost due to development, a Hydrological and Hydraulic Modelling Exercise has been undertaken. The modelling provides a more detailed assessment of the existing (baseline) scenario and existing site levels, compared to the high

level EA mapping. The results of the baseline assessment (which represents a worst-case scenario (where all existing drainage is blocked), shows similar extents to the existing EA Surface Water Flood Risk Mapping and confirms the flow route through the site.

- 3.105 Following the baseline modelling exercise, the post-development scenario has also been modelled to ensure that the existing flow route through the site is maintained and that there is no detrimental impact upon third party land. To appropriately manage the flow path through the site, levels across the site have been reviewed and lowered within the landscape to create a preferential flow route for any overland flows which may occur. Where possible, levels have been lowered to allow for more onsite storage, particularly in the main courtyard area in the centre of the Site and limit any increase in flood depths offsite. The hydraulic modelling carried out by Hydrock does not account for any existing drainage features that may serve the site (hereon referred to as the 'baseline proposed modelling'), in line with standard modelling practice, and are therefore an overestimation to current levels of flood risk on site.
- 3.106 In addition to the baseline proposed modelling, modelling has been undertaken with the drainage features of the Current Scheme built-in. The modelling demonstrates that with the drainage of the proposed development (not accounting for the existing wider area network managed by Thames Water), the proposals would result in a reduction of flood levels to the railway land to the north by over 200mm and therefore confirms that the development does not lead to increased flood risk elsewhere.
- 3.107 The modelling demonstrates compliance with the requirements of the LBRuT SRFA and the NPPG, without any significant changes to the scheme. Refer to the flood reports referred to above, Revised DAS Addendum, Revised Landscape DAS Addendum and revised landscape plans for the details of the resulting scheme revisions.

Drainage

- 3.108 The Drainage Strategy prepared by Manhire and sets out the drainage strategy for the site to ensure the Current Scheme would comply with Policy SI 13 of the London Plan. The report includes a summary of the previously proposed drainage strategy and the Current Scheme.

Basement Development

- 3.109 A Basement Screening and Impact Assessment has been prepared by Manhire, and submitted with the Current Scheme as per the requirements of the LBRuT SRFA and latest LBRuT validation requirements. The Basement Impact Assessment concludes that the proposed basement, due to its small scale (202 sqm), isolated nature and site conditions, would not have any adverse impacts.

Conclusion

- 3.110 With respect to flooding and drainage considerations, the Current Scheme is supported by a full suite of updated documents. The Current Scheme includes a lowering of levels across the site to create a preferential flow route for any overland flows which may occur, and to allow for more onsite storage, particularly in the main courtyard area in the centre of the Site and limit any increase in flood depths offsite. The changes are considered to be minor technical amendments and do not result in any adverse effects.

-
- 3.111 Prior to this submission, we have been in detailed discussions with the GLA's flood and drainage consultant. Additional information was requested in relation to hydraulic modelling, drainage and water efficiency. A technical note has been prepared by Brookbanks to address the matters raised and has been reviewed by the GLA's flood and drainage consultant. The GLA's consultant is satisfied with the submitted information. The Current Scheme fulfils the policy requirements for flooding and drainage.

Design, Townscape and Visual Impact

Summary of Position at Mayoral Hearing

- 3.112 Paragraph 176 of the Hearing Report identifies that the site includes tall buildings above 30 metres and therefore requires a greater level of design scrutiny in accordance with Policy D4 of the Intend to Publish London Plan. The proposals were subject to an extensive process of design scrutiny: twice by LBRuT Design Review Panel and five times by the Mayor's Design Advocates. The proposed development evolved as a result of these comments, including redistribution and refinement of the massing, increased separation distances and changes to materiality and architectural detailing. The scale and massing were considered acceptable and the Revised Proposed Development was considered to comply with Policy D4 of the Intend to Publish London Plan.
- 3.113 The Hearing Report also found the proposed layout to be a sensible and appropriate response to the local context and approach to optimising the site's capacity. Notable benefits included the provision of active frontage, high quality public realm and urban greening. The Revised Proposed Development was considered to comply with Policy D3 of the Intend to Publish London Plan.
- 3.114 Paragraph 211 of the Hearing Report concludes that a thorough assessment of the Revised Proposed Development's impact on the townscape, local character, skyline and heritage assets demonstrates that the proposed buildings, being of high quality architecture and materials, would not result in undue harm. It was also considered that the Revised Proposed Development would result in enhancements to the current streetscape along Manor Road through the introduction of a new street frontage. The Revised Proposed Development was found to comply with Policies D3 and D9 of the London Plan (2021).

Summary of Relevant Policy/ Guidance Changes

- 3.115 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan and the updates to the NPPF.
- 3.116 Section 12 of the NPPF supports well-designed, beautiful and safe places, requiring developments to function well, be visually attractive, be sympathetic to local character, establish or maintain a strong sense of place, optimise the potential of the site and create safe, inclusive and accessible places.
- 3.117 Policies HC3 and HC4 of the London Plan consider development proposals within strategic and borough views. Policy HC4 requires Boroughs to clearly identify important local views in the Local Plans. These policies are consistent with those of the Intend to Publish London Plan.
- 3.118 Policy D3 requires development proposals to optimise site capacity and ensure they make the best use of land. Policy D9 of the adopted London Plan requires development proposals to address the visual impacts of tall buildings, including the views of the building from different distances,

architectural quality and materials, and avoiding harm to heritage assets. It is noted that at the time of the Hearing and the publication of the Hearing Report, these policies were subject to a Direction from the Secretary of State, requiring the policy to be updated. Current Policies D3 and D9 of the adopted London Plan incorporates these changes.

- 3.119 Policy 45 of the Draft Local Plan states that proposals for tall buildings (defined as 7 storeys or over, or 21 metres or more (whichever is lower)), will only be appropriate in the Tall Building Zones where they would not result in any adverse visual, functional, environmental or cumulative impacts.
- 3.120 Site Allocation 29 of the Draft Local Plan clarifies that part of the site is identified as a tall building zone (7-8 storeys) with a mid-rise buffer zone (5-6 storeys) and recommends that the appropriate heights for the site are up to 8 storeys.

Planning Assessment

Building Heights

- 3.121 The proposed building heights of the Current Scheme do not vary from that considered acceptable by the Mayor in October 2020. The planning application includes assessment (and other) work to demonstrate compliance with London Plan Policy D9.
- 3.122 The Current Scheme includes buildings of up to 11 storeys (Block B) adjacent to the railway tracks to the north of the site. Whilst it is noted that this exceeds the aspirations set out in Site Allocation 29 of the draft Local Plan, the assessment (and other) information submitted as part of the application justifies exceeding this. Noting that the Draft Local Plan has not been subject to examination in public yet and is subject to unresolved objections, it should be afforded limited weight in decision making at this time.
- 3.123 On the basis of compliance with London Plan Policy D9 we do not consider the building heights to pose a development plan policy conflict.
- 3.124 Whilst level access from Manor Road and to all block entrances has been maintained, levels have been amended across the landscape in order to manage the surface water flow path through the site. The level changes across the landscape have resulted in minor changes to the ground floor finished floor levels ('FFLs') (increases of c.15cm). However through the reduction of floor to ceiling heights across the development (reductions of c.7.5cm per floor), the overall maximum parapet heights of the buildings are either maintained or reduced (as set out in Table 6.4 below).
- 3.125 Accordingly, the elevational changes do not result in a material impact on the scale or appearance of the buildings, as the proportions of the buildings are generally maintained and the height reductions would be imperceptible.

Block	Number of Storeys	Maximum AOD Parapet Height	Height Changes of Tallest Part of Block
A	8	+35.15	0 cm
B	11	+43.525	-15 cm
C	10	+39.95	-40 cm
D	8	+35.15	0cm

Table 6.4: Maximum Heights (Current Scheme)

Building Footprints

3.126 Following the Government's announcement in July 2023 confirming the intention to mandate second staircases in new residential buildings above 18 metres, the proposals have been revised to ensure all buildings above 18 metres meet these standards and present the highest standard of fire safety. This has been accommodated through internal changes, including improving the efficiencies of circulation space and reductions in unit sizes, and minor external changes, including marginal increases in building footprint. The full extent of the changes are set out in the accompanying DAS Addendum, but are summarised as follows:

- **Block A, Core A:** a 450mm (or 45cm) increase to the south;
- **Block A, Core AD:** a 225mm (or 22.5cm) increase to the south;
- **Block B:** a 112.5mm (or 11.25cm) extension in footprint to the south and a 112.5mm (or 11.25cm) extension to the north;
- **Block C, Core A:** a 225mm (or 22.5cm) increase to the north and north-east and a 112.5mm (or 11.25cm) increase to the east;
- **Block C, Core C:** an infill of the recessed part of the façade to the south-east;
- **Block D, Core B:** a 225mm (or 22.5cm) increase to the north and north-west.

3.127 The increases in footprint have been accommodated to facades facing into the central landscaped area of the Site. There are no increases in footprint proposed to the façades facing the Site boundaries and, as such, there are no reductions in the distance of the proposed buildings to neighbouring residential receptors and the proposed buildings therefore maintain a positive relationship with their surroundings.

3.128 The proposed increases to the building footprints are not considered to be material amendments to the scheme. They are minor in nature when considered in the context of the overall scale of the proposed development. The increases would not be readily perceptible and would have a minimal impact on the massing and appearance of the development above and beyond that considered, and found to be acceptable, by the Mayor in July 2020.

Townscape and Visual Impact

3.129 As detailed above, the Current Scheme incorporates minor changes to the heights and footprints of proposed buildings relative to that considered by the Mayor in 2020. Accordingly, revised visualisations and a Townscape and Visual Impact Assessment Addendum has been prepared to demonstrate the visual impact of the Current Scheme.

3.130 Additionally, LBRuT submitted comments on the November 2021 Amendments stating the impact of the roof top plant has not been fully accounted for in the townscape assessment, and it should be included within the views provided within the Townscape and Visual Impact Assessment ('TVIA') (2019) and subsequent addendums, to provide full awareness of the true visual impact of the proposals. It

is worth noting that the planning application is not seeking detailed approval for plant details at this stage (this is reserved for future consideration against draft Condition 4). The TVIA Addendum (2019) assessed what planning permission is sought for, including the proposed parapet on top of the buildings, and such an approach is common in many applications.

- 3.131 Notwithstanding the above, a TVIA Addendum (September 2023) has been prepared by Arc to analyse the visual impact of the Current Scheme. The TVIA Addendum concludes that the Current Scheme, with the roof level plant, does not have an additional impact upon the townscape relative to the Revised Proposed Development considered by the Mayor in October 2020.

Design and Appearance

- 3.132 Additionally, to address changes to Fire Safety policies, minor changes have been made to ground floor treatments, including the introduction of external undercrofts in lieu of residential lobbies (see Revised DAS Addendum for further details). The external courtyards will incorporate arches with gates, as already provided within the central courtyard areas, and therefore accord with the architectural language considered acceptable in the Hearing Report.

Conclusion

- 3.133 The Current Scheme does not propose increases to the maximum heights of building. Whilst the Current Scheme incorporates some enlargement of building footprints, distances from the site boundary and a positive relationship with the neighbouring context is maintained. The proposed changes do not result in any perceptible changes to the proposed buildings and the revisions are not materially different to the Revised Proposed Development considered at the Hearing.
- 3.134 The visualisations also demonstrate the likely scale of the proposed roof plant and lift overruns for information purposes only (noting that the detail of such plant is secured via draft planning condition 4 (as per the 2022 GLA Update Report and Draft Decision Notice) and conclude that the visual impact would not be over and above the impact considered acceptable by the Mayor in October 2020.

Public Realm and Landscape

Summary of Position at Mayoral Hearing

- 3.135 The Revised Proposed Development involved a landscape proposal that had been developed following the Mayoral call in, directly in response to advice from the Mayor's Design Advocates.
- 3.136 Paragraph 189 of the Hearing Report concluded that subject to details of planting, hard surface treatments and street furniture, the landscaping proposals would ensure a high quality setting for the proposed buildings. The proposed landscaping included a rich mix of ornamental planting, grassland, green walls and hedges which would help to meet urban greening objectives and address air quality issues. The Hearing Report found the Revised Proposed Development to comply with draft policies D3 and D8 of the Intend to Publish London Plan.
- 3.137 Paragraph 340 of the Hearing Report identified that the Urban Greening Factor ('UGF') has been calculated to be 0.35. Whilst this fell short of the 0.4 target in the Intend to Publish London Plan, due to the quality and quantity of green infrastructure proposed, the positive engagement with the Policy and a clear description of the constraints to further greening, the current score was considered

acceptable and the Revised Proposed Development was found to comply with Policy G5 of the Intend to Publish London Plan.

Summary of Relevant Policy/ Guidance Changes

- 3.138 Since the Hearing, key changes to relevant policy for this topic relate the adoption of the 2021 London Plan and publication of draft London Plan Guidance in respect of UGF assessments.
- 3.139 Policies D3, D8 and D9 in the adopted London Plan are broadly consistent with the draft policies in respect of approaches to public realm and urban greening.
- 3.140 Site Allocation 29 of the Draft Local Plan seeks to ensure the proposals for the site provide a high-quality public realm, including permeability through the site with sensitive landscape design that can promote active transport.
- 3.141 Policy 38 of the Draft Local Plan will require that major developments that are predominantly residential achieve a minimum UGF of 0.4.

Planning Assessment

The November 2021 Amendments

- 3.142 The November 2021 Amendments incorporated a reduction in the site area by reducing the red line site boundary to better reflect the title deeds.
- 3.143 The November 2021 Amendments achieved a UGF score of 0.31, which represented a slight reduction from the UGF at the time of the Hearing, and the Update Report required a condition to be attached requiring landscape revisions to be made to enable a site wide target of 0.4 to be achieved.

The Current Scheme

- 3.144 Since the November 2021 Amendments, landscape proposals for the site have been revisited (predominantly as a result of the flood modelling and increases in building envelopes to include second staircases). This has enabled the scheme to address matters relating to greening enhancements. The details of the amendments and urban greening are provided in the DAS Landscape Addendum (August 2023) prepared by Gillespies and demonstrate that the high quality of the landscape proposals, site permeability and play space quantum are maintained in the Current Scheme.
- 3.145 The Current Scheme achieves an UGF of 0.36 site wide. While it is noted that the recommended target of the London Plan is 0.4, the site comprises land that is unsuitable and unable to be greened further. The UGF London Plan Guidance notes that:

'Where land within the site boundary is not under the control of the applicant, for instance adopted roads, these should still be included in the total site area. This may constrain the area available for urban greening. In such instances the applicant should seek to make up for the constraint by including more high-quality urban greening across the wider site.'

- 3.146 The bus layover and Manor Road footway present no opportunity for greening as a result of the operational requirements of TfL and the requirement for the proposed footway to prioritise

pedestrian movements. Accordingly, it is not possible to provide any soft landscaping or greening of these areas.

- 3.147 In accordance with the UGF London Plan Guidance, higher quality urban greening has been optimised as far as possible across the wider site. The UGF, calculated with the bus layover area and Manor Road footway excluded from the net site area, complies with the 0.4 target of the London Plan and demonstrates that greening across the site has been maximised as far as possible. A number of strategies have been employed to optimise the score, including maximising the areas of amenity planting on the ground floor, implementation of better species of planting (i.e. native hedgerow mix) and additional tree planting within courtyards in soft landscaped areas (where trees will be able to achieve sufficient roof volume).
- 3.148 Policy G5 *recommends* a target score of 0.4 for developments that are predominantly residential, but does not set this score as an absolute threshold³. It does, however, require that development proposals contribute to the greening of London by including urban greening as a fundamental element of site and building design. The Current Scheme achieves this through revised landscape proposals that positively integrate with the wider design to deliver a high quality development. The Current Scheme maximises greening of the site as far as possible and complies with Policy G5.

Heritage and Archaeology

Summary of Position at Mayoral Hearing

- 3.149 Paragraphs 203, 204 and 205 of the Hearing Report consider the impacts of the Revised Proposed Development on the Sheendale Road Conservation Area, the Sheen Road Conservation Area, the Grade II* Listed Hickey's Almshouses and the Royal Botanic Gardens Kew World Heritage Site. The Hearing Report concludes that the Revised Proposed Development would result in neutral or no impact upon the heritage assets.

Summary of Relevant Policy/ Guidance Changes

- 3.150 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan and the publication of the 2021 NPPF.
- 3.151 Section 16 of the NPPF (2021) is not materially different from the 2019 NPPF. The considerations remain consistent and require the harm, if any, of a proposal to be weighed against the public benefits of the scheme.
- 3.152 Policy HC1 of the adopted London Plan is consistent with Policy HC1 of the Intend to Publish London Plan. It states that development proposals affecting heritage assets and their settings should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. Furthermore, proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

³ As confirmed in the recent appeal decision at 66-70 High Street, Bromley (appeal ref. APP/G5180/W/21/3285586), where the Inspector found that Policy G5 provides a *target* UGF score, and *not an absolute minimum*.

-
- 3.153 Policy 29 of the Draft Local Plan seeks to ensure that development conserves and, where possible, takes opportunities to make a positive contribution to the historic environment of the Borough.

Planning Assessment

- 3.154 A Heritage Statement Addendum accompanied the July 2020 submission and considered the impact of the Revised Proposed Development. The Heritage Statement Addendum confirmed that the Revised Proposed Development would not be visible from a number of relevant heritage assets, and that the Revised Proposed Development would not harm the heritage significance of the Sheendale Conservation Area. The conclusions were echoed by the GLA in the Hearing Report.
- 3.155 No material changes have taken place since the 2020 Heritage Statement Addendum. The proposed marginal increases to the buildings' footprints are not material when considered in the context of the scale of the development. The proposed enlargements would not be perceptible in the overall context of the scale of the development and would maintain the same distances from the site boundaries and therefore relationship with the surroundings. As such, it is not considered that the proposed increases would have any impact upon sensitive heritage receptors over and above that considered and found to be acceptable by the Mayor in July 2020.
- 3.156 The Original Application was accompanied by an Archeological Desk-based Assessment, prepared by CgMs. The assessment concluded that the Site has limited archaeological potential and no mitigation measures were recommended. The conclusions of this assessment remain valid for the Current Scheme.

Access and Transport

Summary of Position at Mayoral Hearing

- 3.157 The Hearing Report notes that the Revised Proposed Development would make acceptable alterations to the public realm, that the parking provision was acceptable in this urban location and that the Revised Proposed Development would not result in highway or pedestrian safety concerns subject to conditions and the completion of a Section 106 Agreement.
- 3.158 The trips and traffic impacts associated with the Revised Proposed Development was considered to be acceptable. Two car club spaces with active charging facilities were proposed, and three-years free car club membership was to be secured by the Section 106 Agreement.
- 3.159 Cycle parking was also considered to accord with the standards of Policy T5 of the Intend to Publish London Plan.
- 3.160 Vehicle access to TfL's existing bus terminus would be maintained and operational for TfL throughout and post construction of the development.
- 3.161 Loading and deliveries for residents would be centred at the Block B concierge, which would allow for centralised collection or managed distribution throughout the site. LBRuT and TfL agreed that the proposed deliveries and servicing arrangement were acceptable.

Summary of Relevant Policy/ Guidance Changes

- 3.162 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan and the publication of the 2021 NPPF, however no material changes to Policies T4 and T6 of the London Plan have arisen.
- 3.163 At the time of the Hearing, the site benefitted from a PTAL rating of 5, on a scale of 0 to 6b, where 6b is the highest. Following the Hearing, changes to the bus and rail network in the vicinity of the site came into effect on 12 December 2020. As a result of these changes the PTAL of the site is now 4. This was previously considered in the November 2021 Amendments and was considered in the GLA Update Report 2022, where it was confirmed that there is sufficient space capacity on the revised network to accommodate the demand arising from the proposed development.
- 3.164 A further circumstantial change is the scheduled commencement of TfL improvement works to Manor Circus in 2023, which has been discussed with transport planning and project officers at TfL.
- 3.165 Policy 1 of the Draft Local Plan sets out a strategic aspiration to create environments that enhance opportunities for walking and cycling safely and improve connectivity and accessibility for all.
- 3.166 It is also noted that LBRuT adopted its 'Refuse and Recycling: Storage and Access Requirements for New Developments' SPD in December 2022. The SPD provides detailed guidance on LBRuT's requirements for the storage and collection of solid waste.

Planning Assessment

The November 2021 Amendments

- 3.167 In November 2021, changes to reduce the red line site boundary resulted in amended locations of the proposed 2 car club spaces and bin storage areas, which were previously located adjacent to the northern railway boundary, were relocated between Blocks B and C.
- 3.168 The Transport Assessment Addendum (2021) confirmed that the November 2021 Amendments continues to comply with relevant planning policy, notwithstanding the reduced PTAL level of the site.

Impacts on The Highway Network

- 3.169 The Transport Assessment Addendum (August 2023) reviews the data and survey data undertaken to support the original Transport Assessment and considers the data to be fit for purpose. Additionally, it confirms that the Current Scheme would continue to have no detrimental impacts upon the pedestrian and cycle networks and bus and rail services. Furthermore, by virtue of its car free nature and its replacement of a car-intensive out-of-centre retail park, the Current Scheme would not pose any additional impacts on the highway network.
- 3.170 The construction programming of the Manor Circus works and the proposed development at Manor Road have been discussed with TfL, and dialogue will continue during the duration of the Manor Circus works to minimise disruption. Further details can be found in the Revised CEMP (February 2023). It is relevant to note that Manor Road is not proposed to be closed during these works, and access to the site and bus layover will continue. As such no amendments are required to the previously agreed construction traffic routing. Condition 14 of the draft Decision Notice requires the submission and

approval of Demolition and Construction Logistics Plans which will provide further details of any implications. TfL have agreed that no further construction traffic modelling is required at planning application stage.

Cycle Parking

- 3.171 Following a review of the cycle parking provision, long-stay residential cycle storage spaces have been rationalised, resulting in minor changes to the number of spaces within each core and building. However the total provision meets the minimum 805 spaces required, including 5% enlarged spaces, by Policy T5 of the London Plan and specified in condition 18 of the draft decision notice associated with the June 2022 GLA Update Report. It is considered that the revisions to the cycle storage quantum in each core and layout of the internal areas is not a material change.
- 3.172 The total provision would comply with Policy T5 of the London Plan (2021).
- 3.173 Furthermore, in addition to the car-free nature of the Current Scheme and the proposed site permeability and public realm, the provision of cycle parking would promote active travel in accordance with the emerging policies of the Draft Local Plan.

Servicing Strategy

- 3.174 Additionally, a Waste Management Strategy Addendum (August 2023) has been provided alongside this submission. The Addendum takes the LBRuT SPD on Refuse and Recycling into consideration. Waste storage capacity has been provided on site in accordance with the waste generation rates detailed in the SPD, including food waste bins. To note, the Current Scheme will be serviced by twice weekly waste collection via the access point from Manor Road and service road contained to the west of the Site. The Waste Management Strategy Addendum provides further details of the waste storage capacity and servicing arrangements and demonstrates compliance with local guidance.

Energy and Sustainability

Summary of Position at Mayoral Hearing

- 3.175 Paragraph 326 of the Hearing Report concludes that the Revised Proposed Development would minimise carbon dioxide emissions, in accordance with Development Plan requirements, with a carbon offset contribution secured in the Section 106 Agreement. It also notes that the Original Proposed Development committed to achieving high standards in sustainable design and construction.
- 3.176 The Revised Proposed Development had regard of the draft energy and sustainability policies proposed in the Intend to Publish London Plan. The Energy Strategy for the site included measures to reduce carbon dioxide emissions beyond the 2013 Building regulations requirements of 35% for the residential and non-residential elements of the development. A range of passive design features and demand reduction measures were proposed, including Air Source Heat Pumps (ASHP), low volume water fixtures and fittings, space cooling, high efficiency lighting, high efficiency ventilation and insulation pipework. These measures resulted in an anticipated reduction in regulated carbon emissions of 45.7%.

-
- 3.177 In addition, a block-by-block district heating approach was considered acceptable, as there was no centralised location with sufficient space to accommodate the required heat pumps for a centralised system, and the distribution losses were lower (7% relative to 18% in a site-wide network, equating to 25 tonnes CO2 per annum). The approach would also enable future connection to an area wide district heating network and a Section 106 obligation to continue to prioritise connection to an area wide district heating network was agreed.
- 3.178 The Revised Proposed Development included the use of renewable energy technologies, most notably air source heat pumps and photovoltaics. A condition was secured for detailed roof layouts for all blocks to be submitted for further consideration, to ensure that photovoltaics had been maximised.
- 3.179 The Revised Proposed Development complied with the targets of the 2016 London Plan in terms of carbon dioxide savings for the residential and non-residential elements. In order to meet the zero-carbon target for the residential element, a contribution of £422,885 through the Section 106 was agreed. Additionally, given the advanced stage of the Intend to Publish London Plan, the Section 106 Agreement included an increased carbon offset sum if the Plan was adopted prior to a decision being reached. This obligation required a contribution of £17,000 for the non-residential element of the Revised Proposed Development and £670,000 for the residential element.
- 3.180 Policy LP 22 of the LBRuT Local Plan requires non-residential buildings over 100 sqm must meet the BREEAM 'Excellent' rating. The Sustainability Strategy submitted with the Revised Proposed Development included a BREEAM Pre-Assessment, which confirmed an 'Excellent' rating for the commercial space, with a baseline score of 74.2%. The BREEAM Pre-Assessment also set out commitments by the applicant to specify products with an environmental product declaration and to use FSC certified timber for construction through a sustainable procurement plan.
- 3.181 With regards to water use, Policy SI 5 of the Intend to Publish London Plan required proposals to incorporate water saving measures and equipment so that mains water consumption would meet a target of 105 litres per head per day, and that commercial development achieves at least the BREEAM 'Excellent' standard for water consumption. The Sustainability Strategy that supported the Revised Proposed Development confirmed compliance with the target for residential development. A BREEAM 'Very Good' was targeted for the shell of the non-residential component of the development, with water consumption excluded as fitout will be done separately, and the maximum number of other available water credits for the shell were achieved.

Summary of Relevant Policy/ Guidance Changes

- 3.182 Since the Hearing, key changes of relevance for this topic are the adoption of the 2021 London Plan, the publication of the 2021, the changes to Building Regulations (Part L and Part O) requirements, the consequential updates to the GLA Energy Assessment Guidance (2022) and Carbon Emissions Reporting Spreadsheet and draft LPG documents.
- 3.183 Policies SI 2, SI 5, SI 5 and SI 7 are all broadly consistent with the draft Intend to Publish London Plan versions.
- 3.184 Policy 4 of the Draft Local Plan requires all development to reduce greenhouse gas emissions on-site in accordance with the London Plan's Energy Hierarchy, and for major developments to achieve a net-zero carbon with a minimum of 60% on-site reduction amongst other criteria. Fundamentally, the

Policy seeks to establish a carbon offset fund of £300 per tonne across all development within the LBRuT.

Planning Assessment

- 3.185 Due to the changes to the Building Regulations requirements, adoption of the Circular Economy Statement and Whole Life Carbon LPGs, and updated GLA Energy Planning Guidance and Carbon Emissions Reporting Spreadsheet, an updated suite of energy and sustainability documents have been submitted alongside the current updates. This includes a Revised Energy Strategy (2023), Revised Sustainability Statement (2023), Updated Whole Life Carbon Assessment (2023) and Updated Circular Economy Statement (2023).
- 3.186 The revised Energy Strategy for the site targets demand reduction measures first, giving priority to optimisation of building fabric to reduce the need for heating, cooling and artificial lighting. The MEP systems and sustainability features have been optimised to minimise energy demand whilst envelope insulation is proposed to ensure heating demand is minimised and solar coating on windows will reduce the need for cooling.
- 3.187 Relative to the former Energy Strategy (July 2020), the baseline carbon dioxide emissions have been reduced from 650 to 355.4 tonnes CO₂ per annum. Additionally, following the introduction of be lean, be clean and be green measures, cumulative on-site savings have been increased from 45.8% to 62%. The on-site savings therefore exceed the minimum requirement set out in the Draft Local Plan.
- 3.188 Noting the representations the Applicant has submitted in regards to Policy 4 of the Draft Local Plan, and in particular the proposed carbon offset fund, it is subject to unresolved objections and should therefore be afforded limited weight in decision making at this time.
- 3.189 The revised Sustainability Statement details the sustainability aspects of the Current Scheme and demonstrates compliance with the site wide strategies for sustainability through meeting enhanced requirements in the latest planning policy and guidance. The adopted strategy for the Current Scheme demonstrates that the design will holistically incorporate sustainability principles in relation to climate change, energy, water efficiency, flood risk and SUDs, construction, pollution, landscaping, biodiversity, waste and recycling.
- 3.190 Additionally, a revised Whole Life Cycle Carbon Assessment and Circular Economy Statement are submitted as per the London Plan (2021) and LPGs. The reports demonstrate the Consolidated Proposals compliance with adopted policy and guidance, including achieving carbon emissions below the GLA aspirational residential benchmark and diverting 95% of construction waste from landfill.

Ecology

Summary of Position at Mayoral Hearing

- 3.191 The Application Development was supported by a Preliminary Ecological Assessment & Preliminary Bat Roost Assessment prepared by Tyler Grange in 2019 (the 'PEA'). LBRuT raised no objection to the Application Development in relation to ecology, subject to a condition being included for a Habitat Management Plan for each phase of work (including No Net Loss and Net Gain calculations, and details of ecological enhancements), which remains appropriate.

-
- 3.192 The PEA identified that the majority of habitats within the site that may be lost as a result of development are of negligible ecological importance and no specific mitigation is required. It also found that the buildings and trees on the site have negligible potential to support roosting bats, but nevertheless recommends measures to avoid disturbance of commuting bats.
- 3.193 The Hearing Report concludes that although the loss of limited existing habitat is unfortunate, the proposals mitigate the loss and enhance existing ecology and biodiversity through the proposed tree planting and landscaping.

Summary of Relevant Policy/ Guidance Changes

- 3.194 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan and the publication of the 2021 NPPF.
- 3.195 The NPPF requires development to contribute to and enhance the natural environment by minimising biodiversity impacts and providing a biodiversity net gain.
- 3.196 Policy G6 of the London Plan requires development proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain, which should be informed by the best available ecological information and addressed from the start of the process. This is consistent with Policy G6 of the Intend to Publish London Plan, which was considered in the Hearing Report.
- 3.197 It is also noted that the Environment Act 2021 introduces provisions that require development proposals to achieve a biodiversity net gain (although this requirement has yet to come into force).
- 3.198 Policy 39 of the Draft Local Plan requires development proposals comprising one or more dwellings to provide a measurable 20% net gain for biodiversity, in line with the latest available version of the DEFRA metric.

Planning Assessment

- 3.199 Due to the time that has lapsed since the preparation of the Preliminary Ecological Assessment & Preliminary Bat Roost Assessment, an Addendum Report (the 'PEA Addendum') has been submitted alongside current updates which is based on new 2022 survey data to ensure complete robustness of the assessment work from an ecological perspective.
- 3.200 The report concludes that taking account of the recent survey data, and the revised landscape proposals, the conclusions of the original PEA remain valid.
- 3.201 The 2019 PEA used the DEFRA's 2.0 Biodiversity Net Gain Metric to calculate the biodiversity net gain for the Application Development. Since 2019, two new iterations of the biodiversity net gain metric have been released. The updated biodiversity net gain assessment for the Current Scheme utilises the DEFRA's Biodiversity Net Gain Metric 3.1 and accounts for the improved landscape proposals.
- 3.202 A Biodiversity Net Gain Metric (Ref. 11778/BNG) prepared by Tyler Grange has been submitted with the current updates. It finds that the habitat units of the existing site are calculated as 4.82. The Current Scheme would deliver 18.31 habitat units and would achieve a biodiversity net gain of +279.94%.

-
- 3.203 As such there are no material changes associated with ecology considerations at the site and the Current Scheme would deliver a significant biodiversity net gain, in accordance with the NPPF, Policy G6 of the London Plan and Policy 39 of the Draft Local Plan.

Arboricultural Impacts

Summary of Position at Mayoral Hearing

- 3.204 The Revised Proposed Development included the removal of 42 trees, of which 39 were subject to an area Tree Protection Order ('TPO'). The Arboricultural Appraisal submitted alongside the Revised Proposed Development found that the trees, although protected, are of moderate to poor quality with little prospect of making significant contribution to the local landscape. The Revised Proposed Development included the installation of 141 new trees, which represented an increase of 77 trees relative to the existing site.
- 3.205 The Hearing Report concluded that, on the basis of the quality of the existing trees within the TPO, the proposed increase in the number of trees on the site and the additional landscaping to be secured by the Section 106 Agreement, the Revised Proposed Development would comply with Policy G7 of the Intend to Publish London Plan.

Summary of Relevant Policy/ Guidance Changes

- 3.206 Since the Hearing there have been no significant updates to policy or guidance relating to trees following the adoption of the 2021 London Plan.
- 3.207 The 2021 NPPF includes a new paragraph 131 which requires developments to explore opportunities to incorporate trees and ensuring that appropriate measures are in place to secure the long-term maintenance of newly planted trees.
- 3.208 Policy 42 of the Draft Local Plan resists the loss of trees unless the tree has little to no amenity value and it is not possible to retain the tree as part of the development, and that, where practicable, appropriate replacements for any trees that are felled are provided.

Planning Assessment

- 3.209 As part of the November 2021 Amendments, the number of trees to be lost by the development was reduced to 38, while 141 new trees would still be planted. The landscape proposals of the Current Scheme maintain the planting of 141 new trees.
- 3.210 The Revised Arboricultural Appraisal and Implications Assessment prepared by ACS Tree Consulting (December 2023), and submitted alongside the current updates, is supported by an update survey of existing trees. The report concludes that the trees, although subject to a TPO, are low category trees with 33 trees falling under Category C and the remaining 9 under Category B.
- 3.211 The LBRuT Committee Report notes that the Council's Tree Officer agreed that the trees were of limited quality and raised no objections to the loss of the trees, subject to sufficient and suitable soft landscaping and tree planting in the proposed scheme.

-
- 3.212 While the development results in the loss of 38 trees, the trees are of low value and their removal is necessary to facilitate the delivery of 453 new homes, including 40% affordable housing. Furthermore, the Current Scheme would provide high quality soft landscaped areas, 141 new trees and a biodiversity net gain of +279.94%, which would enhance the ecological value of the site. The Current Scheme therefore complies with the NPPF taken as a whole, Policy G7 of the London Plan and Policy 42 of the Draft Local Plan.

Air Quality

Summary of Position at Mayoral Hearing

- 3.213 Paragraph 346 of the Hearing Report concludes that the Revised Proposed Development would result in a large reduction in vehicle movements and would not lead to adverse impacts on local air quality. The Revised Air Quality Assessment (July 2020) also demonstrated that future occupiers of the development would receive acceptable levels of air quality. The development was found to comply with Policy SI 1 of the Intend to Publish London Plan.
- 3.214 The proposal would also be Air Quality Neutral in its operational phase through the use of electric plant and transport emissions being below the Transport Emissions benchmark.

Summary of Relevant Policy/ Guidance Changes

- 3.215 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan.
- 3.216 Policies within the 2021 NPPF are consistent with the 2019 considerations.
- 3.217 Objective GG3 of the London Plan requires those involved in planning and development to seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of public exposure to air quality. This is consistent with the Intend to Publish London Plan.
- 3.218 Policy SI 1 of the London Plan states that developments must be at least air quality neutral and use design solutions to prevent or minimise increased exposure to existing air pollution, and that an Air Quality Assessment must be submitted with major proposals to demonstrate that the proposals would not lead to deterioration of existing poor air quality. This is consistent with Policy SI 1 of the Intend to Publish London Plan.
- 3.219 Policy 53 of the Draft Local Plan requires that all developments are at least 'Air Quality Neutral', and that developments in areas already subject to poor air quality are submitted with an air quality impact assessment and incorporate mitigation measures to reduce the development's impact on air quality, protect the occupiers of new development and reduce the impact of transport from the development upon air quality.

Planning Assessment

- 3.220 The Site is located within an Air Quality Management Area ('AQMA'), therefore an Air Quality Assessment ('AQA') was submitted with the Original Application, and revised prior to the Hearing. A further revised AQA (February 2023), which fully considers the latest policy and guidance has been prepared to assess the Current Scheme and consider the impacts of the construction and operation

of the scheme. This report also seeks to address consultation comments regarding air quality concerns which have received by the GLA from the public since the Hearing took place.

- 3.221 The Revised AQA (February 2023) concludes that, with the implementation of a series of dust mitigation measures set out in the Air Quality and Dust Management Plan which will be secured by condition, the residual significance of potential air quality impacts during construction is not significant.
- 3.222 The Revised AQA reports that there are predicted to be no exceedances of any relevant air quality objectives for the pollutants modelled. Although the WHO guidelines (2005) for PM_{2.5} are predicted to be exceeded, it is not the result of the operation of the Current Scheme, but instead a borough-wide (and London-wide) issue. Based on recent advice from the GLA, mitigation measures against PM concentrations are not recommended for the purposes of meeting the WHO guidelines. This is due to the energy penalties associated with the installation, operation and maintenance of this filtration which, in the absence of any other objective exceedances, is not considered to be appropriate.
- 3.223 For the operational phase, the Current Scheme would continue to be air quality neutral through the use of electric plant as opposed to gas fired energy, and transport emissions being below the Transport Emissions Benchmark.
- 3.224 Given the minimal changes to Policy SI 1 between the Intend to Publish and adopted London Plans, and the conclusions of the latest Revised AQA, the Current Scheme continues to comply with the current development plan and relevant guidance.
- 3.225 It is also noted that LBRuT's Air Quality Officer raised no objections to the Original Application, subject to the inclusion of relevant conditions.
- 3.226 The Current Scheme is car free and incorporates a commitment for the provision of car club bays and membership for future occupiers, thereby minimising the impact of transport from the development upon air quality.
- 3.227 In accordance with the London Plan (2021) and the Air Quality Positive LPG (2023), an Air Quality Positive Statement is required for large-scale developments that are subject to an Environmental Impact Assessment (EIA). The Current Scheme is not EIA development, as confirmed by LBRuT in the Screening Opinion dated 14 December 2018, and there is therefore no requirement for the submission to be supported by an Air Quality Positive Statement.

Noise & Vibration

Summary of Position at Mayoral Hearing

- 3.228 A Revised Noise and Vibration Impact Assessment (July 2020), prepared by Hoare Lea, supported the Revised Proposed Development. The assessment considered noise and vibration occurring from road traffic, the railway lines, building services and the bus layover. As part of the assessment, an acoustic survey was carried out and found the site to be exposed to relatively high levels of environmental sound, primarily the result of road and railway traffic. Mitigation measures were incorporated into the façade design, i.e. performance of the glazing, to ensure adequate internal sound levels.

-
- 3.229 The Hearing Report concluded that material impacts of noise and vibration on the Revised Proposed Development can be adequately addressed during the detailed design stages. Conditions were recommended for sound insulating façade materials and suitable sound proofing between separating structures of commercial and residential uses.

Summary of Relevant Policy/ Guidance Changes

- 3.230 Since the Hearing, there have been no significant planning policy or guidance updates at the national or regional levels in respect of noise and vibration.
- 3.231 Policy 46 of the Draft Local Plan requires development to ensure that proposals do not result in harm to the reasonable enjoyment of buildings, including in terms of noise.

Planning Assessment

- 3.232 There are no material changes relating to the scheme which would impact the consideration of noise and vibration impacts. A number of conditions are proposed in the draft Decision Notice which will provide sufficient control of noise and construction during demolition, construction and operational phases of the development (see draft conditions 13, 15, 32, 33, 34, 46).
- 3.233 It should be noted that LBRuT Environmental Health Officer raised no objections to the Revised Proposed Development regarding noise and disturbance, subject to conditions.

Wind Microclimate

Summary of Position at Mayoral Hearing

- 3.234 A Wind Microclimate Assessment was submitted alongside the Revised Proposed Development. The assessment was based on a qualitative desk-based methodology that has tested the wind impacts of the proposal using meteorological data, the Lawson pedestrian comfort criteria and the occurrence of strong winds.
- 3.235 The assessment finds that the Revised Proposed Development would not be expected to change the wind conditions for existing residential buildings around the site. Furthermore, there would be acceptable wind conditions at ground level and planting would improve the comfort level of amenity and play areas throughout the site.
- 3.236 The assessment also found that there would be some terraces and upper floor balconies with poor comfort levels during worse season conditions for Blocks B, C and D. However, mitigation measures, which are to be developed at the detailed design stage, were secured by condition to ensure the comfort levels for the affected balconies and terraces would be improved.
- 3.237 The Hearing Report finds the Revised Proposed Development to therefore comply with policy D8 of the Intend to Publish London Plan.

Summary of Relevant Policy/ Guidance Changes

- 3.238 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan.

-
- 3.239 Policy D8 of the London Plan requires consideration to the local microclimate created by buildings. This is consistent with Policy D8 of the Intend to Publish London Plan.
- 3.240 Policy 46 of the Draft Local Plan requires that new development provides adequate outdoor amenity space that is free from excessive wind.

Planning Assessment

- 3.241 The Wind Microclimate Assessment (2020) concluded that the Revised Proposed Development is not expected to change the wind conditions around the existing residential buildings surrounding the site.
- 3.242 Changes between the Revised Proposed Development and the Current Scheme result in no changes from a wind and microclimate perspective. While the height of the proposed blocks has been revised as part of the Current Scheme, their location on the site, and in relation to surrounding residential buildings, has not changed. Furthermore, draft conditions secured at the time of the Hearing Report would control this.
- 3.243 The Wind Microclimate Assessment (2020) found that the seating areas of the roof terraces of Blocks A, C and B would have little shelter from the prevailing south-westerly winds. In response to this finding, and as noted in the Landscape DAS Addendum (August 2023), the seating areas in the roof terraces of Blocks A and C have been located northward to ensure sufficient shelter and adequate wind microclimate conditions for users. The roof terrace for Block B has been removed for reasons set out elsewhere in this Statement.
- 3.244 The draft conditions, secured at the time of the Hearing Report, require consideration and installation of additional mitigation measures as necessary. Subject to the condition and development of detailed design, users of the roof terraces would benefit from appropriate wind microclimate conditions.
- 3.245 It should also be noted that LBRuT raised no concerns regarding wind and microclimate on the Original Application.

Daylight, Sunlight & Overshadowing

Summary of Position at Mayoral Hearing

- 3.246 Paragraph 221 of the Hearing Report concludes that the daylight and sunlight assessment, including third party review, demonstrates adequate levels of light for future occupiers. Although it notes that there is some concern regarding lower courtyard units in Block A, this is not entirely unexpected as there is always a balance to be struck between the provision of outdoor amenity space and daylight penetration into lower floor units.
- 3.247 Paragraph 291 of the Hearing Report concludes that, in the absence of massing on the site currently, any development of scale would necessarily result in adverse daylight/sunlight impacts upon neighbouring residential uses. Although the Revised Proposed Development would result in a noticeable reduction in light to some nearby properties, the residual light levels are all within acceptable limits and the reduction was considered an unavoidable outcome from optimisation of the site's capacity. The Hearing Report disagreed with LBRuT's Reason for Refusal 3 based on loss of light to neighbouring residential properties.

Summary of Relevant Policy/ Guidance Changes

- 3.248 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan and adoption of updated BRE Guidance.
- 3.249 Policy D6 of the London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst minimising overshadowing. This is consistent with Policy D6 of the Intend to Publish London Plan.
- 3.250 In addition, the BRE Guidelines (Site layout planning for daylight and sunlight: a guide to good practice) were updated in 2022. The updated BRE Guidelines adopt a different assessment methodology based on a more climate-based assessment. This change applies only to internal assessments (i.e. proposed residential units). Additional guidance relating to solar panels and solar glare has been introduced, setting out recommendations and measures for development to include solar panels, guidelines where additional testing for solar glare may be necessary.
- 3.251 Policy 46 of the Draft Local Plan requires that development ensures the design and layout of buildings does not have an unacceptable impact on levels of daylight and sunlight on the host building or neighbouring properties.

Planning Assessment

The Proposed Residential Units

- 3.252 The Revised Proposed Development considered at the Mayoral Hearing in October 2020 was developed in accordance with the BRE Guidance (2011) which was in place during the design development and determination period. As such, there is no strict requirement for the Current Scheme to comply with more recent guidance due to transitional arrangements.
- 3.253 Notwithstanding, and for completeness, an updated Internal Daylight Report has been submitted alongside the current update. This tests 120 habitable rooms across the development against the latest BRE Guidance (2022) and finds that 65% of tested rooms would meet or exceed the minimum CBDM target, with the majority of the affected rooms served by balconies and reduced views of the sky to those rooms that are overhung by balconies.
- 3.254 As concluded in the Hearing Report, there is a balance to be struck between the provision of outdoor amenity space and daylight penetration into lower floor units. It is considered that the level of light would therefore be acceptable, particularly as the shortfalls in light are marginal relative to the required target median of lux for the room type.

Neighbouring Residential Receptors

- 3.255 As noted in the Hearing Report, a development of scale would necessarily result in adverse sunlight/daylight impacts upon neighbouring residential sites due to the absence of massing on the site currently.
- 3.256 The 2022 BRE Guidelines do not introduce any changes to the assessment of daylight and sunlight impacts upon external receptors.

-
- 3.257 Whilst the Current Scheme incorporates enlargements to the proposed buildings' footprints, the increases are located on facades that face into the site. Accordingly, there distances from the site boundary (and subsequently neighbouring receptors) has been maintained. The Current Scheme also does not incorporate any increases in the height of the proposed buildings.
- 3.258 Please refer to the accompanying letter prepared by Point2 (Right to Light Surveyors), which confirms that the modifications incorporated in the Current Scheme are unlikely to materially alter the headline daylight and sunlight results in relation to surrounding residential buildings as presented within the July 2020 Report.

Solar Dazzle and Convergence

- 3.259 With regards to solar dazzle, the 2022 BRE Guidelines note that solar dazzle can occur either where there are large areas of reflective glass or cladding that slope back so that high altitude sunlight can be reflected along the ground. Thus, solar dazzle is only a long term problem for some heavily glazed (or mirror clad) buildings. The Current Scheme does not include large areas of reflective glass or cladding and the facades do not slope back. Therefore solar dazzle would not occur.
- 3.260 Similarly, the 2022 BRE guidelines note that solar convergence can happen when a reflective structure has a concave arrangement that focus the sun's rays. The Current Scheme does not include large areas of reflective material or concave arrangements and therefore solar convergence would not occur.

Health Impact

Summary of Position at Mayoral Hearing

- 3.261 A Health Impact Assessment (HIA) was prepared in July 2020 and submitted alongside the Revised Proposed Development. This showed that there is a surplus capacity of 560 primary school places within a 1.6 mile radius of the site and a surplus capacity of 5,671 secondary school places within a 3.4 mile radius of the site. Although the LRBuT Committee Report expressed concerns over the secondary school capacity, LRBuT did not recommend refusal on these grounds and it considered that the increased demand for school places could be adequately met through existing school capacity and the CIL contribution from the development of the site.
- 3.262 The HIA showed that the average number of registered patients per full time equivalent general practitioner ('FTE GP') is 1,712, which is lower than the HUDU (London Health Urban Development Unit Planning Contributions Model) guidance of 1,800 patients per GP. A contribution of £193,500 was to be secured in the Section 106 Agreement for the Revised Proposed Development towards the provision of healthcare in the local area. It was considered the impact on local healthcare facilities would be acceptable.

Summary of Relevant Policy/ Guidance Changes

- 3.263 Since the Hearing, key changes to relevant policy for this topic are the adoption of the 2021 London Plan and the publication of the 2021 NPPF.
- 3.264 Section 2 of the NPPF outlines a social objective in achieving sustainable development. This objective requires development to be well-designed, beautiful and safe with accessible services and open

spaces that reflect current and future needs and support communities' health, social and cultural well-being. This is consistent with Section 2 of the 2019 NPPF.

- 3.265 Objective GG3 of the London Plan seeks to improve Londoners' health and reduce health inequalities. Policy S1, S2 and S3 of the London Plan support the provision of adequate social infrastructure, including health and education facilities, as part of new developments. These Policies and Objective are consistent with the Intend to Publish London Plan.
- 3.266 There have been small updates to baseline data which feeds into the HIA, and minor changes to the affordable housing mix.
- 3.267 Policy 51 of the Draft Local Plan requires that a Health Impact Assessment is submitted with all major development proposals. Additionally, Policy 49 of the Draft Local Plan requires development proposals for 10 or more residential units to assess the potential impacts on existing social and community infrastructure in order to demonstrate there is sufficient capacity within the existing infrastructure to accommodate the needs arising from new development.

Planning Assessment

- 3.268 A Health Impact Assessment Addendum (May 2023) prepared by Hatch, has been submitted with the Current Scheme to ensure that the development continues to have an acceptable impact upon social infrastructure in the area.
- 3.269 The HIA Addendum concludes that that there have been no changes to the outcome of the assessment of potential health impacts and all impacts remain as stated in the original submitted HIA, with the exception of impact on health care provision. The updated assessment of the impact on health care services has shown that there is likely to be sufficient capacity within the local catchment to accommodate any additional residents yielded from the Current Scheme. As such, the impact has been revised from Adverse to Neutral.
- 3.270 Similar to the Revised Proposed Development, subject to conditions and/or planning obligations, the Current Scheme is acceptable with regard to health impact.

4. Planning Obligations and Community Infrastructure Levy

4.1 In respect of the negotiation of planning obligations associated with development, Regulation 122 (2) of the Community Infrastructure Levy ('CIL') Regulations states that:

'A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –

a) Necessary to make the development acceptable in planning terms;

b) Directly related to the development; and

c) Fairly and reasonably related in scale and kind to the development.'

Draft Section 106 Agreement Heads of Terms

4.2 Planning obligations will be secured to mitigate impacts arising from the development.

4.3 The changes to the Revised Proposed Development proposed by the current scheme are minor. As a result, the S106 heads of terms considered in the Hearing Report (October 2020) would continue to adequately mitigate the impacts of the development.

4.4 A draft S106 Agreement was published alongside the Update Hearing Report (2022), which accounted for the November 2021 Amendments. The drafting comprises the following S106 Heads of Terms:

- Affordable housing (quantum, tenure, affordability, nominations, Council grant funding, viability reviews);
- Controlled parking zone restrictions, contributions towards CPZ reviews consultations and implementation;
- Car club provision on site for 2 vehicles and 3 year residential membership;
- Network rail financial contributions (railway safety, level crossing improvements and station access feasibility study);
- Contributions to North Sheen station improvements;
- TfL Manor Circus road safety scheme contribution;
- Securing continued operation and use of the bus layover;
- Residential and commercial travel plans;
- Highways works (S278)
- Provision of public realm as publicly accessible including central square maintenance and management arrangements;
- Play space provision contribution and maintenance contribution;
- Manor Road tree planting scheme;
- Carbon offset fund contribution;
- Local employment scheme (construction and operation);

-
- Financial contribution to primary healthcare; and
 - Monitoring fee.
- 4.5 We are aware that the TfL Manor Circus improvement works are scheduled to commence in 2023, and as such the previously agreed financial contribution can no longer be used to fund this scheme.
- 4.6 Following consultation with TfL and a review of local needs (as set out in the accompanying Transport Assessment Addendum of August 2023), an improved contribution towards North Sheen Station improvements has been agreed over and above that set out in the previous draft of the S106 agreement.
- 4.7 Additionally, whilst the Transport Assessment Addendum (August 2023) finds that the development would not result in detrimental impacts on the transport network, we propose a Sustainable Travel Implementation Fund to monitor the proposed Travel Plans and, where the expected mode share targets are not being met, the Fund can be used to promote improvements or initiatives aimed at increasing the relevant mode share. This could include delivery of cycle or pedestrian infrastructure, i.e. a cycle wheeling ramp on the overbridge at North Sheen Station, cycle training, additional uncontrolled pedestrian crossings or a review of dropped kerb and tactile paving on local routes.
- 4.8 We note that the carbon offset contribution of £423,000 set out in the GLA Hearing Report (1 October 2020) was based on the former energy strategy for the Site. The Current Scheme incorporates a new energy strategy and reduces carbon emissions. As such, the cash-in-lieu contribution for carbon offset should be reduced to £381,164.

Community Infrastructure Levy

- 4.9 The LBRuT CIL Charging Schedule came into effect from 1 November 2014. The site falls within the 'Higher Band CIL Charging Zone' where the rates relevant to the Proposed Development are as follows:
- Residential - £250 per sqm; Retail / commercial floorspace not wholly/mainly convenience, nor inside Richmond Town Centre – £0 per sqm;
- 4.10 The development is also liable for Mayoral CIL in line with the MCIL2 rates which came into effect on 1 April 2019. The MCIL2 rates associated with LBRuT are £80 per sqm (Band 1).
- 4.11 Whilst the Homebase store has recently been vacated, the store will have been in lawful retail use for at least six months of the last three years.
- 4.12 Affordable housing provided within the scheme will qualify for social housing relief from CIL.

5. Summary and Conclusion

5.1 This Planning Statement Addendum has been prepared by Avison Young on behalf of Avanton Richmond Development Ltd to explain and justify proposed revisions to planning application ref. 19/0510/FUL (GLA ref. 4795) that have taken place since the Mayor resolved to grant planning permission in 2020. The changes have been made principally to ensure accordance with changes to planning policy and guidance that have been made in the period since 2020.

5.2 In summary, the changes comprise the following:

- Amendments to the affordable housing tenure split to accord with Policy H6 of the London Plan 2021;
- Minor amendment to the application red line boundary to better reflect the existing title plans, resulting in a slight decrease in the overall site area (768.7 sqm.);
- Consequential amendments to the ground floor landscaping/layout plan to reflect the realigned boundary, including the relocation of the proposed car club spaces and bin holding area; and
- Updates to the transport statement and travel plan for the Site in light of changes to the PTAL rating.
- The introduction of a second staircase in all cores with a height of over 15 metres and associated alternations, including minor reductions in the internal areas of the homes and/or minor increases in the building envelope in inward courtyard facing facades; however, no net loss of units or changes to unit types);
- Minor changes to internal ground floor layouts across all of the Blocks to respond to updated Fire Safety regulations (detailed in the accompanying DAS Addendum);
- Minor changes to site levels to ensure that the proposal does not lead to detrimental impacts off-site in regards to surface water flooding by revisiting surface water flow routes through the site and incorporating flood resilience measures across the site;
- Subsequent minor reductions to the maximum AOD heights of two of the proposed buildings, in part achieved through reductions to the floor to ceiling heights within the buildings to address the site level changes;
- Associated revisions to the landscaping to accommodate the proposed surface water drainage strategy and to maximise the Urban Greening Factor of the Proposal;
- Minor changes to internal flat layouts across all of the Blocks to respond to the Housing Design Standards LPG;
- Rationalisation of plant at roof levels and associated amendments to roof terraces;
- An updated Energy Strategy for the site with minor revisions to plant area sizes and roof top layouts (detailed in the accompanying DAS Addendum); and
- Revised proposed financial obligations towards transport improvements from the Manor Circus improvement works to improvements to North Sheen Station.

-
- 5.3 Please refer to the Consolidated Document Schedule at Appendix I, which sets out the final schedule of documents and plans for approval.
 - 5.4 The changes do not materially alter the nature, scope or quantum of the development which received a resolution to grant planning permission at the Mayoral Hearing in October 2020.
 - 5.5 The Current Scheme continues to comply with the objectives of national, regional and local policy and guidance.
 - 5.6 The Current Scheme continues to deliver a number of significant benefits including the delivery of new homes including affordable homes, a reduced number of car trips arising from car free development, improvements to air quality associated with a reduction in road traffic emissions, economic benefits, a contribution to community infrastructure under CIL and a new high quality public realm. The proposals continue to accord with the development plan, when read as a whole.
 - 5.7 As such, the proposal should continue to be supported and the S106 Agreement completed without delay.

Appendix I

Consolidated Document Schedule

Document / Report	Documents Considered at Mayoral Hearing, October 2020	Final Documents for Approval, including Revised Documents since Mayoral Hearing, November 2022
Site Location Plan	MNR AA ALL ZZ DR A 1000 R2	MNR AA ALL ZZ DR A 1000 R3
Existing Site Block Plan	MNR AA ALL ZZ DR A 1100 R2	MNR AA ALL ZZ DR A 1100 R3
Existing Ground Floor Plan	MNR AA ALL GF DR A 1200 R2	MNR AA ALL GF DR A 1200 R4
Existing Mezzanine Plan	MNR AA ALL M1 DR A 1201 R2	MNR AA ALL M1 DR A 1201 R4
Existing Sections	MNR AA ALL ZZ DR A 1300 R2	MNR AA ALL ZZ DR A 1300 R3
Existing Elevations	MNR AA ALL ZZ DR A 1400 R2	MNR AA ALL ZZ DR A 1400 R3
Existing Bus Layover Facilities	MNR-AA-ALL-ZZ-DR-A-1600 R1	MNR-AA-ALL-ZZ-DR-A-1600 R1
Site Plan Demolition	MNR AA ALL ZZ DR A 1500 R2	MNR AA ALL ZZ DR A 1500 R4
Ground Floor Demolition	MNR AA ALL GF DR A 1501 R2	MNR AA ALL GF DR A 1501 R3
Mezzanine Floor Demolition	MNR AA ALL M1 DR A 1502 R2	MNR AA ALL M1 DR A 1502 R3
Sections Demolition	MNR AA ALL ZZ DR A 1503 R2	MNR AA ALL ZZ DR A 1503 R3
Elevations Demolition	MNR AA ALL ZZ DR A 1504 R2	MNR AA ALL ZZ DR A 1504 R3
Proposed Basement Plan	MNR AA ALL B1 DR A 1999 R13	MNR AA ALL B1 DR A 1999 R23
Proposed Ground Floor Plan	MNR AA ALL GF DR A 2000 R21	MNR AA ALL GF DR A 2000 R40
Proposed First Floor Plan	MNR AA ALL 01 DR A 2001 R18	MNR AA ALL 01 DR A 2001 R33
Proposed Second Floor Plan	MNR AA ALL 02 DR A 2002 R15	MNR AA ALL 02 DR A 2002 R29
Proposed Third Floor Plan	MNR AA ALL 03 DR A 2003 R15	MNR AA ALL 03 DR A 2003 R28
Proposed Fourth Floor Plan	MNR AA ALL 04 DR A 2004 R15	MNR AA ALL 04 DR A 2004 R29
Proposed Fifth Floor Plan	MNR AA ALL 05 DR A 2005 R15	MNR AA ALL 05 DR A 2005 R28
Proposed Sixth Floor Plan	MNR AA ALL 06 DR A 2006 R15	MNR AA ALL 06 DR A 2006 R28
Proposed Seventh Floor Plan	MNR AA ALL 07 DR A 2007 R15	MNR AA ALL 07 DR A 2007 R27
Proposed Eighth Floor Plan	MNR AA ALL 08 DR A 2008 R14	MNR AA ALL 08 DR A 2008 R26
Proposed Ninth Floor Plan	MNR AA ALL 09 DR A 2009 R14	MNR AA ALL 09 DR A 2009 R26
Proposed Tenth Floor Plan	MNR AA ALL 10 DR A 2010 R4	MNR AA ALL 10 DR A 2010 R16
Proposed Roof Plan	MNR AA ALL 11 DR A 2011 R18	MNR AA ALL 11 DR A 2011 R32
Proposed Phasing Plan	MNR-AA-ALL-GF-DR-A-2100 R2	MNR-AA-ALL-GF-DR-A-2100 R6
Affordable Housing Plan	MNR-AA-ALL-10-DR-A-2110 R4	MNR-AA-ALL-10-DR-A-2110 R7
Waste Storage Plan	MNR-A-SK-200925HB01-R1	<i>Now contained in the Waste Management Strategy Addendum</i>
Block A, Core A Ground Floor Plan	MNR AA BA1 GF DR A 2100 R11	MNR AA BA1 GF DR A 2100 R26
Block A, Core A First Floor Plan	MNR AA BA1 01 DR A 2101 R10	MNR AA BA1 01 DR A 2101 R20
Block A, Core A Second Floor Plan	MNR AA BA1 02 DR A 2102 R10	MNR AA BA1 02 DR A 2102 R19
Block A, Core A Third Floor Plan	MNR AA BA1 03 DR A 2103 R10	MNR AA BA1 03 DR A 2103 R19

Block A, Core A Fourth Floor Plan	MNR AA BA1 04 DR A 2104 R10	MNR AA BA1 04 DR A 2104 R20
Block A, Core A Fifth Floor Plan	MNR AA BA1 05 DR A 2105 R10	MNR AA BA1 05 DR A 2105 R19
Block A, Core A Sixth Floor Plan	MNR AA BA1 06 DR A 2106 R10	MNR AA BA1 06 DR A 2106 R19
Block A, Core A Seventh Floor Plan	MNR AA BA1 07 DR A 2107 R10	MNR AA BA1 07 DR A 2107 R19
Block A, Core A Roof Floor Plan	MNR AA BA1 08 DR A 2108 R1	MNR AA BA1 08 DR A 2108 R19
Block A, Cores B, C, D Basement Floor Plan	MNR AA BA2 B DR A 2199 R11	MNR AA BA2 B DR A 2199 R19
Block A, Cores B, C, D Ground Floor Plan	MNR AA BA2 GF DR A 2200 R11	MNR AA BA2 GF DR A 2200 R26
Block A, Cores B, C, D First Floor Plan	MNR AA BA2 01 DR A 2201 R10	MNR AA BA2 01 DR A 2201 R21
Block A, Cores B, C, D Second Floor Plan	MNR AA BA2 02 DR A 2202 R10	MNR AA BA2 02 DR A 2202 R20
Block A, Cores B, C, D Third Floor Plan	MNR AA BA2 03 DR A 2203 R10	MNR AA BA2 03 DR A 2203 R20
Block A, Cores B, C, D Fourth Floor Plan	MNR AA BA2 04 DR A 2204 R10	MNR AA BA2 04 DR A 2204 R19
Block A, Cores B, C, D Fifth Floor Plan	MNR AA BA2 05 DR A 2205 R10	MNR AA BA2 05 DR A 2205 R19
Block A, Cores B, C, D Sixth Floor Plan	MNR AA BA2 06 DR A 2206 R10	MNR AA BA2 06 DR A 2206 R19
Block A, Cores B, C, D Seventh Floor Plan	MNR AA BA2 07 DR A 2207 R10	MNR AA BA2 07 DR A 2207 R19
Block A, Cores B, C, D Eighth Floor (Roof) Plan	MNR AA BA2 08 DR A 2208 R10	MNR AA BA2 08 DR A 2208 R18
Block B, Core A Ground Floor Plan	MNR AA BB1 GF DR A 2300 R10	MNR AA BB1 GF DR A 2300 R25
Block B, Core A First Floor Plan	MNR AA BB1 01 DR A 2301 R10	MNR AA BB1 01 DR A 2301 R23
Block B, Core A Second Floor Plan	MNR AA BB1 02 DR A 2302 R10	MNR AA BB1 02 DR A 2302 R20
Block B, Core A Third Floor Plan	MNR AA BB1 03 DR A 2303 R10	MNR AA BB1 03 DR A 2303 R20
Block B, Core A Fourth Floor Plan	MNR AA BB1 04 DR A 2304 R10	MNR AA BB1 04 DR A 2304 R20
Block B, Core A Fifth Floor Plan	MNR AA BB1 05 DR A 2305 R10	MNR AA BB1 05 DR A 2305 R20
Block B, Core A Sixth Floor Plan	MNR AA BB1 06 DR A 2306 R10	MNR AA BB1 06 DR A 2306 R20
Block B, Core A Seventh Floor Plan	MNR AA BB1 07 DR A 2307 R10	MNR AA BB1 07 DR A 2307 R20
Block B, Core A Eighth Floor Plan	MNR AA BB1 08 DR A 2308 R10	MNR AA BB1 08 DR A 2308 R20

Block B, Core A Ninth Floor Plan	MNR AA BB1 09 DR A 2309 R10	MNR AA BB1 09 DR A 2309 R20
Block B, Core A Tenth Floor Plan	MNR AA BB1 10 DR A 2310 R10	MNR AA BB1 10 DR A 2310 R20
Block B, Core A Roof Floor Plan	MNR AA BB1 11 DR A 2311 R2	MNR AA BB1 11 DR A 2311 R12
Block C – Cores A & B Ground Floor Plan	MNR AA BC1 GF DR A 2400 R10	MNR AA BC1 GF DR A 2400 R29
Block C – Cores A & B First Floor Plan	MNR AA BC1 01 DR A 2401 R10	MNR AA BC1 01 DR A 2401 R25
Block C – Cores A & B Second Floor Plan	MNR AA BC1 02 DR A 2402 R9	MNR AA BC1 02 DR A 2402 R22
Block C – Cores A & B Third Floor Plan	MNR AA BC1 03 DR A 2403 R10	MNR AA BC1 03 DR A 2403 R22
Block C – Cores A & B Fourth Floor Plan	MNR AA BC1 04 DR A 2404 R10	MNR AA BC1 04 DR A 2404 R22
Block C – Cores A & B Fifth Floor Plan	MNR AA BC1 05 DR A 2405 R10	MNR AA BC1 05 DR A 2405 R22
Block C – Cores A & B Sixth Floor Plan	MNR AA BC1 06 DR A 2406 R10	MNR AA BC1 06 DR A 2406 R22
Block C – Cores A & B Seventh Floor Plan	MNR AA BC1 07 DR A 2407 R10	MNR AA BC1 07 DR A 2407 R22
Block C – Cores A & B Eighth Floor Plan	MNR AA BC1 08 DR A 2408 R10	MNR AA BC1 08 DR A 2408 R22
Block C – Cores A & B Ninth Floor Plan	MNR AA BC1 09 DR A 2409 R2	MNR AA BC1 09 DR A 2409 R14
Block C – Cores A & B Roof Floor Plan	MNR AA BC1 10 DR A 2410 R2	MNR AA BC1 10 DR A 2410 R13
Block D – Cores A & B Ground Floor Plan	MNR AA BD1 GF DR A 2500 R11	MNR AA BD1 GF DR A 2500 R26
Block D – Cores A & B First Floor Plan	MNR AA BD1 01 DR A 2501 R10	MNR AA BD1 01 DR A 2501 R22
Block D – Cores A & B Second Floor Plan	MNR AA BD1 02 DR A 2502 R10	MNR AA BD1 02 DR A 2502 R21
Block D – Cores A & B Third Floor Plan	MNR AA BD1 03 DR A 2503 R10	MNR AA BD1 03 DR A 2503 R21
Block D – Cores A & B Fourth Floor Plan	MNR AA BD1 04 DR A 2504 R10	MNR AA BD1 04 DR A 2504 R20
Block D – Cores A & B Fifth Floor Plan	MNR AA BD1 05 DR A 2505 R10	MNR AA BD1 05 DR A 2505 R20
Block D – Cores A & B Sixth Floor Plan	MNR AA BD1 06 DR A 2506 R10	MNR AA BD1 06 DR A 2506 R20
Block D – Cores A & B Seventh Floor Plan	MNR AA BD1 07 DR A 2507 R10	MNR AA BD1 07 DR A 2507 R19
Block D – Cores A & B Eighth Floor Plan	MNR AA BD1 08 DR A 2508 R10	MNR AA BD1 08 DR A 2508 R18
Proposed Site Sections	MNR AA ALL ZZ DR A 3000 R5	MNR AA ALL ZZ DR A 3000 R10
Elevation AA – Manor Road	MNR AA ALL ZZ DR A 4000 R3	MNR AA ALL ZZ DR A 4000 R8
Block A Elevations	MNR AA BLA ZZ DR A 4100 R6	MNR AA BLA ZZ DR A 4100 R14

Block A Elevations	MNR AA BLA ZZ DR A 4101 R6	MNR AA BLA ZZ DR A 4101 R14
Block A Elevations	MNR AA BLA ZZ DR A 4102 R7	MNR AA BLA ZZ DR A 4102 R15
Block A Elevations	MNR AA BLA ZZ DR A 4103 R6	MNR AA BLA ZZ DR A 4103 R14
Block A Elevations	MNR AA BLA ZZ DR A 4104 R6	MNR AA BLA ZZ DR A 4104 R14
Block A Elevations	MNR AA BLA ZZ DR A 4105 R6	MNR AA BLA ZZ DR A 4105 R13
Block A Elevations	MNR AA BLA ZZ DR A 4106 R5	MNR AA BLA ZZ DR A 4106 R12
Block A Elevations	MNR AA BLA ZZ DR A 4107 R5	MNR AA BLA ZZ DR A 4107 R12
Block B Elevations	MNR AA BLB ZZ DR A 4200 R6	MNR AA BLB ZZ DR A 4200 R12
Block B Elevations	MNR AA BLB ZZ DR A 4201 R6	MNR AA BLB ZZ DR A 4201 R12
Block B Elevations	MNR AA BLB ZZ DR A 4202 R6	MNR AA BLB ZZ DR A 4202 R12
Block B Elevations	MNR AA BLB ZZ DR A 4203 R6	MNR AA BLB ZZ DR A 4203 R12
Block C Elevations	MNR AA BLC ZZ DR A 4300 R6	MNR AA BLC ZZ DR A 4300 R15
Block C Elevations	MNR AA BLC ZZ DR A 4301 R6	MNR AA BLC ZZ DR A 4301 R14
Block C Elevations	MNR AA BLC ZZ DR A 4302 R6	MNR AA BLC ZZ DR A 4302 R15
Block C Elevations	MNR AA BLC ZZ DR A 4303 R6	MNR AA BLC ZZ DR A 4303 R15
Block C Elevations	MNR AA BLC ZZ DR A 4304 R5	MNR AA BLC ZZ DR A 4304 R13
Block C Elevations	MNR AA BLC ZZ DR A 4305 R5	MNR AA BLC ZZ DR A 4305 R14
Block D Elevations	MNR AA BLD ZZ DR A 4400 R5	MNR AA BLD ZZ DR A 4400 R12
Block D Elevations	MNR AA BLD ZZ DR A 4401 R6	MNR AA BLD ZZ DR A 4401 R12
Block D Elevations	MNR AA BLD ZZ DR A 4402 R5	MNR AA BLD ZZ DR A 4402 R11
Block D Elevations	MNR AA BLD ZZ DR A 4403 R5	MNR AA BLD ZZ DR A 4403 R11
Block D Elevations	MNR AA BLD ZZ DR A 4404 R5	MNR AA BLD ZZ DR A 4404 R11
Block D Elevations	MNR AA BLD ZZ DR A 4405 R4	MNR AA BLD ZZ DR A 4405 R10
Landscape General Arrangement	P11559-00-001-100-08	P11559-00-001-100-17
Landscape Roof Plan	P11559-00-001-101-04	P11559-00-001-101-08
Typical Tree Pit Details	P11559-00-001-400-02	P11559-00-001-400-02
UGF Combined Levels	n/a	P11559-00-001-810 R02
Revised Area Schedule	Proposed Amended Development R4 (September 2020)	MNR AA ALL ZZ SC A 7010 P18
Planning Statement Addendum	Planning Statement Addendum (July 2020)	Planning Statement Addendum (September 2023)
DAS Addendum	DAS Addendum (July 2020)	DAS Addendum R10 (September 2023)
DAS Landscape Addendum	DAS Landscape Addendum (July 2020)	DAS Landscape Addendum (August 2023)
Flood Risk Assessment	Revised FRA and Drainage Strategy (July 2020)	Updated FRA (March 2023) Addendum FRA (September 2023)
Drainage Strategy	n/a	Drainage Strategy (June 2023)
Flood Evacuation and Management Plan	n/a	Flood Evacuation and Management Plan (March 2023)
Flood Sequential Test	n/a	Sequential Test (November 2022)
Hydrological and Hydraulic Modelling Report	n/a	Hydrological and Hydraulic Modelling Report (March 2023)
Basement Screening and Impact Assessment	n/a	Screening and Impact Assessment (February 2023)

LLFA Technical Note	n/a	Technical Note 1: Model Review and Response to LLFA Comments (July 2023)
Air Quality	Revised Air Quality Assessment (July 2020)	Revised Air Quality Assessment (February 2023)
Construction Environmental Management Plan	Revised Construction Environmental Management Plan (November 2021)	Revised Construction Environmental Management Plan (February 2023)
Fire Safety	Revised Fire Safety Statement (July 2020)	Revised Fire Safety Statement (May 2023)
Ecology	Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment (February 2019)	Ecological Impact Assessment (including Biodiversity Net Gain Assessment) (May 2023)
Trees	Arboricultural Report (2019) Arboricultural Report Addendum (July 2020)	Arboricultural Appraisal and Implications Assessment (December 2022) Arboricultural Report Addendum (December 2022)
Health Impact	Health Impact Assessment (2019) Health Impact Assessment Addendum (July 2020)	Health Impact Assessment (2019) Health Impact Assessment Addendum (May 2023)
Daylight, Sunlight and Overshadowing	Revised Daylight and Sunlight Report (July 2020)	Revised Daylight and Sunlight Report (BRE Guidance 2011) (July 2020) Internal Daylight and Sunlight Report (BRE Guidance 2022) (April 2023) Daylight Sunlight Addendum Letter (September 2023)
Townscape and Visual Impact Assessment	TVIA (2019) TVIA Addendum (May 2019) TVIA Addendum (July 2020)	TVIA (2019) TVIA Addendum (May 2019) TVIA Addendum (July 2020) TVIA Addendum (September 2023)
Circular Economy Statement	Revised Circular Economy Statement (July 2020)	Revised Circular Economy Statement (May 2023)
Energy Strategy	Revised Energy Strategy (July 2020)	Revised Energy Strategy (May 2023)
Sustainability Statement	Revised Sustainability Statement (July 2020)	Revised Sustainability Statement (May 2023)
Whole Life-Cycle Carbon Assessment	Whole Life-Cycle Carbon Assessment (July 2020)	Revised Whole Life-Cycle Carbon Assessment (May 2023)
Noise and Vibration Impact Assessment	Revised Noise and Vibration Impact Assessment (July 2020)	Revised Noise and Vibration Impact Assessment (May 2023)
Heritage Statement	Heritage Statement (2019) Heritage Statement Addendum (July 2020)	Heritage Statement (2019) Heritage Statement Addendum (July 2020)*
Utilities Statement	Revised Utilities Statement (July 2020)	Revised Utilities Statement (July 2020)*

Transport Assessment	Revised Transport Assessment (July 2020) Transport Assessment Addendum (April 2021) Transport Assessment Addendum (November 2021)	Revised Transport Assessment (July 2020) Transport Assessment Addendum (April 2021) Transport Assessment Addendum (November 2021)* Transport Assessment Addendum (August 2023)
Travel Plans	Revised Commercial Travel Plan (November 2021) Revised Residential Travel Plan (November 2021)	Revised Commercial Travel Plan (November 2021) Revised Residential Travel Plan (November 2021)*
Delivery and Servicing Management Plan	Revised Delivery and Servicing Management Plan (July 2020)	Revised Delivery and Servicing Management Plan (July 2020)*
Lighting Strategy	Revised Lighting Strategy (July 2020)	Revised Lighting Strategy (July 2020)*
Wind Microclimate Assessment	Revised Wind Microclimate Assessment (July 2020)	Revised Wind Microclimate Assessment (July 2020)*
Waste Management Strategy	Waste Management Strategy (2019) Revised Waste Management Strategy Addendum (2020) Revised Waste Management Strategy Addendum (November 2021)	Waste Management Strategy (2019) Revised Waste Management Strategy Addendum (2020) Revised Waste Management Strategy Addendum (November 2021) Revised Waste Management Strategy Addendum (August 2023)
Geo-Environmental & Geotechnical Preliminary Risk Assessment	Revised Geo-Environmental & Geotechnical Preliminary Risk Assessment (July 2020)	Revised Geo-Environmental & Geotechnical Preliminary Risk Assessment (July 2020)*
Digital Connectivity Note	Digital Connectivity Note (November 2021)	Digital Connectivity Note (November 2021)

*no change to Hearing documentation in 2020

Contact details

Enquiries

Nick Alston

nick.alston@avisonyoung.com

Smruti Patel

smruti.patel@avisonyoung.com

Visit us online

avisonyoung.com

Avison Young

65 Gresham Street, London EC2V 7NQ

Copyright © 2022. Avison Young. Information contained in this report was obtained from sources deemed reliable and, while thought to be correct, have not been verified. Avison Young does not guarantee the accuracy or completeness of the information presented, nor assumes any responsibility or liability for any errors or omissions therein. All opinions expressed and data provided herein are subject to change without notice. This report cannot be reproduced, in part or in full, in any format, without the prior written consent of Avison Young.