

### **GLA Stage 1 Report: Applicant Response**

The table below has been prepared on behalf of the Applicant, Reselton Properties Ltd, to provide responses to comments received from the Greater London Authority ('GLA') within their Stage 1 report dated 20 June 2022 (ref: GLA/2022/0288/S1/01) in respect of the linked applications for planning permission for the masterplan redevelopment of the Stag Brewery (London Borough of Richmond upon Thames ('LBRuT') refs: 22/0900/OUT and 22/0902/FUL).

A list of Appendices to the responses provided in the table has been included at the end of this document.

<b>Topic</b>	<b>GLA Comment (20 June 2022)</b>	<b>Applicant Response (18 August 2022)</b>
Loss of industrial floorspace (para 32)	The former brewery was in industrial use and therefore comprises a nondesignated industrial site for the purpose of London Plan Policy E7. However, the site has been allocated for mixed use development in the Local Plan and the proposed land uses (which does not include industrial floorspace) is in line with the land use aspirations set out in the Local Plan. Therefore, the loss of industrial floorspace capacity can be supported, in line with the criteria set out in Part C of London Plan Policy E7.	Noted
Loss of playing fields (paras 33-40)	At Stage 3, GLA officers concluded that the loss of protected sports and recreation facilities could be outweighed by equivalent or better provision and that the scheme would comply with London Plan Policy S5, subject to the obligations and financial contributions being secured as detailed in the GLA's Stage 3 report. The conclusion of GLA officers on this matter is unchanged in respect of this application, given the details are the same.	Noted
Open space (paras 41-42)	As noted above, the existing open space is private and is not fully accessible to the public. The reconfiguration of the open space is also envisaged in the Local Plan Site Allocation and Planning Brief SPD. At Stage 3, GLA officers concluded that the proposed rearrangement of OOLTI land would represent an increase in the quantum, quality, functionality and accessibility of public realm and areas of open land across the site and the application therefore complies with London Plan Policy G4. The same conclusion is reached on this application.	Noted

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Housing supply (para 43)	London Plan Policy H1 sets a London wide 10-year housing target for 522,870 net additional housing completions by 2029, with Richmond set a 10-year target of 4,110 homes during this period. The provision of 1,085 residential homes would make a significant contribution towards meeting these housing targets, with the proposed scheme equating to 26% of the Council's 10-year housing requirement.	As a result of responding to consultation responses from the HSE and LBRuT the total proposed residential unit number has been reduced by 14, to: up to 1,071 units. This still represents 26% of the Council's 10-year housing requirement.
Office, commercial and night-time economy uses (paras 44-47)	The range and type of non-residential use is broadly the same as with the previous application which was considered by the Mayor as detailed below. The cinema and hotel are identical and the quantum of office and flexible commercial use broadly comparable. Whilst the town centre uses are not within a designated town centre, the proposals do accord with the land use objectives set out in the Local Plan Site Allocation and Mortlake Area of Mixed Use Designation.	Noted
	The applicant is proposing the following maximum and minimum caps on floorspace provision. This is acceptable. Affordable workspace was agreed (circa 10% of the office floorspace) on the previous application and should be secured. Conditions should be secured to limit the size of ground floor commercial units.	Noted
	Night-time economy uses are proposed in the form of a cinema and pub / bar. These are as was proposed in the previous planning application considered by the Mayor. The overall mix, quantum and distribution of commercial, office, leisure and community use is in general accordance with the aspirations set out in the Local Plan Site Allocation, Planning Brief and the Mortlake Area of Mixed Use designation and would not conflict with policies in the London Plan relating to office and business uses and promoting town centres and the night time economy.	Noted
	No issues arise in terms of the Agent of Change principle and the requirements of London Plan Policies D13 and D14 in relation to the Ship Public House and Jolly Gardeners Public House.	Noted
Education use (48-50)	London Plan Policy S3 states that boroughs should ensure there is a supply of good quality education facilities based on need assessments and sets out criteria in Part B which should be applied to development	Noted

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	proposals for new schools. A number of objections were raised on the previous application in relation to the provision of a new secondary school on this particular site in terms of the potential impact on amenity, open space, transport, traffic congestion and air quality impacts, the GLA's Stage 3 report considered the proposals to be in accordance with local, strategic and national planning policy requirements. The same conclusion is also reached on this application.	
Conclusion land use principles (51)	The comprehensive mixed use redevelopment of the site including the proposed land uses is in line with the land use objectives set out in the Local Plan Site Allocation and Planning Brief SPD and would accord with London Plan Policies H1, E7, S3, S5, G4 and SD6.	Noted
Housing and Affordable Housing (52- 68)	The Mayor has set a strategic target for 50% of all new homes to be affordable, as set out in Policy H4 of the London Plan. Policy H5 of the London Plan identifies a minimum threshold of 35% affordable housing (by habitable room), with a higher threshold of 50% applied to public sector owned land and industrial sites where the scheme would result in a net loss of industrial capacity. Applications which do not meet these requirements should follow the Viability Tested Route and subject to both early and late stage review mechanisms and in the case of large phased schemes, a mid-term review. The application is subject to the 50% threshold in the London Plan as the site comprises former industrial land.	The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.
	Richmond's Local Plan Policy LP36 states that 50% of all housing units will be affordable comprising a tenure mix of 40% of affordable rent and 10% affordable intermediate products (i.e. 80% of all affordable housing as affordable rent, and 20% as intermediate). Former employment sites are expected to provide at least 50% on-site affordable housing.	The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.
	The applicant's Design and Access Statement (page 55) and Planning Statement (Appendix D) states that the revised application is proposing	The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability

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	23% affordable housing by habitable room with a 83:17 tenure mix weighted towards social rent (20% by unit, with a 77:23 tenure mix).	matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.
	However, following submission of the application the applicant has since confirmed that this does not represent their affordable housing offer which it has confirmed is 15% affordable housing by unit (17% by habitable room), with the tenure mix being 20% social rent and 80% intermediate shared ownership. This proposal would equate to the following in terms of units: [table then included in the report]	The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.
	The currently proposed quantum and tenure mix of affordable housing is wholly unacceptable. The quantum of social rent on the proposed scheme is just 3% (33 homes), despite this being the Council's preferred affordable housing tenure as set out in the Local Plan.	The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.
	The overall level of affordable housing should be significantly increased and the tenure mix should be revised so that it is weighted in favour of social rent, given the local and strategic affordable housing policies and evidence of housing need and affordability issues.	The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.
	The table below sets out how the revised scheme compares to the original planning application considered by Richmond Council in 2020 and the revised application which was considered by the Mayor at a Representation Hearing in 2021. It unclear why the number of market	The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being

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	homes in the current scheme has increased to 918 (+24 homes) and yet the number of affordable homes has more than halved numerically (-189 homes), with the tenure split worsened substantially. The tenure proposed is now weighted substantially in favour of intermediate in contrast to the scheme which was considered by Richmond Planning Committee in 2020.	sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.
	The applicant's updated Financial Viability Assessment (FVA) concludes that the scheme with 17% affordable housing by habitable room, with the proposed tenure split heavily weighted in favour of intermediate housing, is not viable. This has been assessed against a profit requirement of 20% of the Gross Development Value (GDV) of the market housing. This profit level has not been substantiated and is considered excessive.	The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.
	There are a number of elements to the scheme that impact on the viability including the large basement car park and the cinema. They are included in the assessment at significant cost but at values much lower than these costs. For example, according to the applicant's FVA, the basement would cost circa £66.9 million to construct yet only generates a value at approximately £20.4 million. Similarly, the capital cost of the cinema (including £1 million fit out costs) equates to circa £6.9 million yet only generates a value of £4.1 million.	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix A).
	Clearly, the design decision to incorporate such a large basement within the scheme has a substantial impact on the overall viability of the scheme. Whilst this has design benefits in terms of the quality of the public realm and the reduction in on-street car parking and vehicle movements within the site, the scheme could have been designed to minimise the need for a basement, for example, by incorporating lower levels of standard car parking spaces and incorporating cycle parking and disabled car parking within ground floor podiums wrapped with active residential and non-residential uses at ground floor level. Given the impact on viability, this design decision should be fully justified and the applicant should be required to demonstrate that the provision of	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix A).

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	<p>the basement in this instance has not come at the cost of affordable housing provision within the scheme.</p> <p>The applicant sets out that this scheme will provide 'a new village heart for Mortlake based upon buildings and open public realm of the highest quality' and the large basement and the cinema are justified as part of the overall concept for this scheme. However, this is not reflected in their assumed values.</p>	<p>The cinema will contribute to the placemaking to be delivered by the scheme. The site is located within an Area for Mixed Use (under LBRuT Local Plan) where town centre uses, such as cinema, that serve the local needs will be considered acceptable. In addition, the site is also subject to a Site Allocation which supports town centre uses, as does the SBPB. Therefore the development of a cinema as part of the town centre uses at the site is considered a wholly appropriate use within the proposed masterplan.</p> <p>It is worth noting that in paragraph 222 of the GLA's Hearing Report of July 2021, stated the following in respect of the proposed cinema: <i>"In the above policy context [the cinema use is] strongly supported in providing a diversified offering of night-time economy land uses in this Area of Mixed Use."</i></p>
	<p>The outcome of the applicant's FVA assumes a large deficit which may indicate the under valuation and/or the sub optimisation of the scheme. The applicant has not demonstrated that the scheme is deliverable and that the inputs and overall valuation should be cross-checked against market transactions. It would be appropriate for the target profit to be cross checked against other measures including the Internal Rate of Return to ensure the outcome of testing is robust and it is also important for growth to be modelled on a scheme of this size.</p>	<p>The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.</p>
	<p>At this stage, GLA officers consider that it is likely that both the quantum of affordable housing can be increased and the tenure mix improved in favour of social rent, if both the placemaking potential and future growth are taken into account in the residential values and the scheme is measured against a more realistic developer's return.</p>	<p>The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise</p>

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	<p>However, the GLA have not yet concluded their review as the borough's cost review has not been provided to date.</p> <p>GLA officers consider that additional affordable housing units could be accommodated within the same envelope in Building 18 (which is designated as an affordable housing block). This would increase the overall quantum of affordable housing as well as generating additional value for the scheme. The residential homes within Building 18 are substantially larger than the minimum size standards set out in the London Plan and compared to affordable homes located in similar mansion block typologies set within schemes reviewed by the GLA. The applicant should further investigate the potential to include additional affordable homes in Building 18 within the proposed building footprint and layout whilst maintaining generously sized units and retaining the unit mix proportions set out in the applicant's unit schedule and also avoiding any directly north-facing single aspect units, in line with London Plan Policy D6. This optimisation work should be undertaken at application stage, in line with London Plan Policy H4 which expects all schemes to maximise the delivery of affordable housing which should then be secured from the outset via S106 obligations.</p>	<p>quantum of affordable housing that the scheme will be able to support.</p> <p>Building 18 has been designed in outline. The final internal layout is subject to detailed design at Reserved Matters stage.</p> <p>It is worth noting that under the LBRuT 'resolved to approve' scheme in Jan 2020, it was agreed with LBRuT (see paragraph 7.1.78 of the Jan 2020 Planning Committee Report) that the potential harm of any larger residential units within Building 18 could be mitigated through an appropriately worded Heads of Term for the s106 agreement, requiring:</p> <ul style="list-style-type: none"> <li data-bbox="1318 748 1944 1133">i) Prior to the implementation of Phase 1a (save basement works) an affordable housing scheme (identifying location, floor areas, mix, tenure, rent levels, service charge levels, terms of the transfer of land) shall be submitted to the LPA for approval. Taking into the requirement that units should be no larger than 10% of the NDSS, the scheme will consider whether an uplift in affordable housing units can be delivered within Building 18.</li> <li data-bbox="1318 1138 1944 1414">ii) Not to occupy more than 80% of the market units within Phase 1b, until the reserved matters application or where an uplift is feasible, a further application is submitted and determined (either full planning, variation of condition or non-material amendment), to increase the number of units.</li> </ul>

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	<p>In addition to this, GLA officers are concerned that the applicant is proposing Block 18 as one of the first phases of the scheme, yet it is shown in outline rather than in detail. Further explanation should be provided on this issue.</p>	<p>It is considered that a similar approach for the proposals submitted under this application would be acceptable.</p> <p>See response immediately above.</p>
Mid-Stage Review	<p>A mid-stage viability review should be secured given the size and quantum of housing proposed which would involve numerous blocks and phases. The midreview should be secured, in line with the London Plan and the Mayor's Affordable Housing and Viability SPG.</p>	<p>A mid-stage review will be undertaken via an obligation under the s106 Agreement.</p>
Affordability	<p>Policy H6 of the London Plan sets out the Mayor's preferred affordable housing tenures, which includes social rent/London Affordable Rent; London Living Rent and London Shared Ownership. Paragraphs 4.6.3 to 4.6.10 of the London Plan sets out the Mayor's definition of genuinely affordable housing by tenure. The following key comments are made in terms of tenure and affordability:</p> <ul style="list-style-type: none"> <li>• Low-cost rent products should be secured at social rent or London Affordable Rent (LAR) levels, in line with the published LAR benchmarks. These are significantly less than the NPPF definition for affordable rent, which is not considered affordable as a low cost rent product in London.</li> <li>• London Shared Ownership units should be affordable to households on incomes up to a maximum of £90,000 a year and a range of affordability levels should be provided below the maximum £90,000 household income cap.</li> <li>• All intermediate tenure households should not be required to spend more than 40% of their net income on overall housing costs, including service charges.</li> <li>• Should any intermediate rent products, such as Discount Market Rent (DMR) or London Living Rent (LLR) be subject to a maximum income</li> </ul>	<p>The Viability of the scheme has been the subject of robust scrutiny by LBRuT's own independent advisors. The Applicant is in discussions with LBRuT on all viability matters including other financial obligations being sought as well as the precise mix of tenure. The outcome of these discussions will affect the precise quantum of affordable housing that the scheme will be able to support.</p>

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	<p>cap of £60,000, with a range of incomes secured below the maximum cap for any DMR units.</p> <ul style="list-style-type: none"> <li>• Generally shared ownership is not appropriate where market values of the new homes are likely to exceed £600,000 as set out in the Mayors Affordable Housing &amp; Viability SPG. Where this is the case, for example, homes should be provided as intermediate rent (either London Living Rent or Discount Market Rent).</li> </ul> <p>On the previous application, GLA officers negotiated intermediate housing at a range of income levels as set out in paragraph 324 to 329 of the GLA's Stage 3 Hearing Report. These key obligations ensured that the affordable housing tenures complied with the Mayor's definition of genuinely affordable housing as set out in the London Plan.</p>	
Children's play space (69)	<p>Play space requirements have been calculated using the GLA's play space calculator and based on the required standard of 10 sq.m. of play space provision per child. The site wide requirements for the revised scheme are based on 548 children and 5,480 sq.m. of play space. Excluding the school, the scheme proposes 7,470 sq.m. of play space provision, and the requirements overall and by age category are met. Including the school, 10,374 sq.m. of play provision would be provided. Play provision would be distributed across the site, including within the public realm and residential courtyards. The scheme would comply with the requirements set out in London Plan Policy S4.</p>	<p>In responding to comments from the Health and Safety Executive and the LBRuT, there has been changes resulting in a reduction of 14 residential units across the site.</p> <p>This has led to a minor reduction in the child population yield, which has then led to a change in the amount of playspace required to be provided at the site. Gillespies' Landscape DAS Addendum (page 14) sets this out. The actual provision of playspace proposed is unchanged, and therefore there has been an increase in the overprovision of playspace at the site.</p>
Design, layout, public realm and landscaping	<p>Policies D1-D3 and D8 of the London Plan and the Mayor's Housing SPG apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes and the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages.</p>	Noted

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	<p>The overall layout, public realm and landscaping of the scheme is broadly the same as in the previous application which was determined by the Mayor in 2021. The proposed layout and quality of public realm is in line with the principles and objectives set out in the Stag Brewery Planning Brief SPD and the design policies set out above in terms of creating a well-integrated, legible network of streets and public open spaces which are well-activated with mixed uses and stitch the site back into the surrounding area, linking the River to Mortlake Green.</p>	Noted
Residential quality (para 72-74)	<p>The scheme proposes 50% single aspect units. The vast majority of single aspect homes are east and west facing. However, the revised scheme includes 4% north facing single aspect units. This is a reduction compared to the scheme which was considered by the Mayor at the GLA Representation Hearing. The single aspect units would generally be one or two-bedroom apartments with shallow plans and generous frontages. Mansion blocks are articulated to provide bay windows to enable 'enhanced' single aspect with multiple glazed facades facing different directions.</p>	Noted
	<p>The majority of residential units will meet or exceed the minimum requirement for private outdoor amenity spaces through a mixed provision of ground floor terraces, balconies and external roof terraces. Instances where private amenity space is not achieved are largely limited to residential units situated in the Maltings Building, where heritage considerations have made the installation of external balconies undesirable. This is acceptable given the heritage constraints which prohibit adding balconies to this building. The quantum of internal space within these dwellings would exceed the minimum internal standard so compensates for this.</p>	Noted
	<p>Distances between the blocks range from approximately 30 metres to more narrow spaces ranging from 13.5 metres to 10 metres. Privacy and overlooking issues have been minimised through the design, location and orientation of glazing and bedrooms, living rooms and balconies. However, further detailed mitigation measures are required via conditions and in terms of the detailed design.</p>	Noted

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Heritage (75-78)	<p>Whilst the redistributed massing of the scheme has reduced the impact on the setting of a number of the heritage assets in key views from the River, GLA officers consider that the application would still result in less than substantial harm to the significance of heritage assets as a result of the following impacts:</p> <ul style="list-style-type: none"> <li>• Loss of some historic fabric in the Maltings Building resulting from works necessary for its adaptation from industrial to community and residential uses;</li> <li>• Loss of some historic building fabric in the Former Hotel and Former Bottling Plant;</li> <li>• Demolition of the majority of former brick boundary walls;</li> <li>• Harm to the significance of the Mortlake Conservation Area owing to impact on setting from height and massing and to the setting of the Maltings Building when viewed from Chiswick Bridge and Chiswick Bank;</li> <li>• Harm to the significance of the Grade II listed residential properties situated on Thames Bank between Ship Lane and Chiswick Bridge, including Thames Cottage, Tudor Lodge, Thames Bank House, Leydon House and Riverside House owing to impact on setting from the proposed height and massing of the scheme;</li> <li>• Harm to the significance of the Mortlake Conservation Area and Mortlake Green Conservation Area and the Former Bottling Building and Former Hotel Building owing to the impact of the proposed development on the setting of these heritage assets setting impact when viewed from the south.</li> </ul> <p>The scheme would provide the following heritage benefits:</p> <ul style="list-style-type: none"> <li>• The adaptation and re-use of the Maltings Building with ongoing viable uses (including community facilities).</li> <li>• The restoration of the most significant facades of the Former Hotel and Former Bottling Plant buildings, and their incorporation within the new development.</li> </ul>	<p>Please see paragraphs 37 and 38 of the Townscape Briefing Note, prepared by Montagu Evans, dated 9 August 2022.</p> <p>Please see paragraphs 39-42 of the Townscape Briefing Note, prepared by Montagu Evans, dated 9 August 2022.</p>

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	<ul style="list-style-type: none"> <li>• Use of the retained portions of the Former Hotel Building in a newly proposed hotel, returning the historic use to the site.</li> <li>• Retention and re-use of heritage features within the site including the existing brewery gates and memorial plaques.</li> </ul>	
	<p>In accordance with the NPPF, incidences of ‘less than substantial harm’ should be weighed against the public benefits of the proposal, including heritage related public benefits. Considerable weight and importance must be attached to the harm caused by the proposals to surrounding heritage assets in any balancing exercise. As the application would harm heritage assets, the proposals conflict with London Plan Policy HC1.</p>	<p>Please see paragraphs 43-46 of the Townscape Briefing Note, prepared by Montagu Evans, dated 9 August 2022.</p>
	<p>When considering the previous planning application in 2021 in the GLA’s Stage 3 Representation Hearing Report, GLA officers set out a number of public benefits which weighed in favour of the scheme, as set out in paragraph 701 of the Representation Hearing Report. Weight was given to the provision of additional housing and affordable housing across the site which, at that time, comprised 28% affordable housing by unit / 30% by habitable room (127 low cost rent homes and 148 intermediate homes). However, in this application only 15% affordable housing by unit (17% by habitable room) is proposed which would comprise 33 low cost rent homes and 134 intermediate homes. As a result, GLA officers consider that significantly less weight can now be given to the provision of affordable housing on the scheme as a public benefit. The extent to which the public benefits can be given weight in the balancing exercise can only be determined at Stage 2.</p>	<p>Noted</p>
<p>Density and Design Review (79)</p>	<p>GLA officers understand that design reviews have been undertaken on the revised application at pre-application stage. The Design Review Panel (DRP) was generally supportive of the underlying urban design and masterplanning principles for the site and the redistribution of the height and massing, except for the proposed height increase to Block 10 which the Panel considered would have a dominant effect on the retained historic bottling building. The DRP also expressed concerns</p>	<p>The design of Building 10 has been amended to remove a typical storey.</p> <p>The updated design is explained in greater detail in the DAS Addendum, prepared by Squires. Please also refer to the updated drawing schedule, dated 21 July 2022, for the final set of drawings for Building 10.</p>

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	regarding a number of issues including the number of single aspect and north facing single aspect units; privacy and overlooking distances between habitable rooms; the site's urban greening factor score; and the architectural approach proposed for mansion blocks and warehouse apartment buildings which did not have enough detail and richness.	With respect to the other matters raised by the DRP prior to submission, these are considered within the application (see paragraphs 13.23 and 13.25 of the submitted Town Planning Statement, prepared by Gerald Eve LLP, dated March 2022).
Height, massing and tall buildings (80-86)	London Plan Policy D9 seeks to ensure that there is a plan-led approach to the development of tall buildings across London and that the visual, functional, environmental and cumulative impacts of tall buildings is appropriately considered to avoid adverse or detrimental impacts.	Noted
	Part B of Policy D9 states that boroughs should determine which locations are appropriate for tall buildings (subject to meeting the other requirements of the Plan) and states that tall buildings should only be developed in these suitable locations.	Noted
	Part C of Policy D9 sets out qualitative criteria for assessing the visual, functional, environmental and cumulative impacts and design quality of tall buildings. Tall buildings should achieve exemplary architectural and materials quality and should contribute positively to the character of the area, aid legibility and wayfinding and have a positive impact on the public realm. Tall buildings should avoid harm to heritage assets and should not adversely affect local or strategic views. Environmental impacts including wind, microclimate, daylight/sunlight, glare impacts should be assessed. Cumulative visual, function and environmental impacts should also be assessed. Development near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.	Noted
	In terms of the local planning policy context, Policy LP2 of Richmond's Local Plan defines tall buildings as those of 18 metres (six storeys) in height or taller. The policy also defines 'taller' buildings as those significantly taller than the neighbouring buildings, but less than 18 metres in height. The Local Plan identifies Mortlake Brewery as being one of a select few specific and exceptional sites outside Richmond and	Noted

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	Twickenham centres, where 'tall' and 'taller' buildings may be appropriate in principle.	
	The Stag Brewery Planning Brief SPD (2011) envisages building heights on the site ranging from 3 to 7-storeys with 3, 4 and 5-storey buildings to the west of the site closest to the playfields and nearby residential properties. To the east of Ship Lane a range of heights up to 6 to 7-storeys are expected. In general, the SPD states that taller buildings should be generally located at the core of the site and the height and scale should diminish towards the perimeter of the site or along the Riverside.	Noted
	<p>The proposed height and massing is shown below. The development would range in height between 3, 4, 5, 6, 7, 8 and 9-storeys. The previous scheme which was refused by the Mayor ranged in height from 3 to 10-storeys. Moving west to east across the scheme, the key changes compared to the refused scheme considered by the Mayor in 2021 are as followings:</p> <ul style="list-style-type: none"> <li>• Blocks 20 and 21 – reduction in height from 4 to 3-storey, with terraced homes now proposed instead of mansion blocks.</li> <li>• Block 19 – reduction of 6-storey element to 4 and 5-storeys and reduction of 7- storey element to 6-storeys</li> <li>• Block 15 – introduction of a 7-storey recess on the western side of the block adjacent to the school building.</li> <li>• Block 16 – reduction in height from 6 and 8-storeys in the refused scheme to 5 and 6-storeys in the revised scheme.</li> <li>• Block 03 – reduction in height from 7 to 6-storeys</li> <li>• Block 04 – reduction in height from 8 and 9 -storeys with a 10-storey pop-up element on the southern corner to 8-storeys with a 9-storey pop-up element in the revised scheme.</li> <li>• Block 07 – reduction in height from 9-storeys with a 10-storey pop-up element to 8-storeys with a 9-storey pop-up in the revised scheme.</li> </ul>	<p>Please note that in response to design comments received from LBRuT the following changes to building heights have been made:</p> <p>The top floor of B01 is now 14.3m and B10 is now 6 storeys with the top floor at 18.13m.</p> <p>This is set out in greater detail in the DAS Addendum, prepared by Squire &amp; Partners.</p>

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	<ul style="list-style-type: none"> <li>• Block 08 – reduction from 9-storeys to 9 and 8-storeys in the revised scheme.</li> <li>• Block 11 – reduction from 0-storeys to 8-storeys.</li> <li>• Block 12 – increase in the western side of the block from 7 to 8-storeys</li> <li>• Block 10 – increase in height from 5 to 6-storeys in the refused scheme to 6 to 7-storeys in the revised scheme.</li> <li>• Block 05 – reduction in height of part of the block to the west of Bottleworks Square from 5 to 4-storeys.</li> <li>• The height of the school building and Block 01 which comprises the cinema is unchanged.</li> </ul>	
	<p>In terms of London Plan Policy D9, the Council’s Local Plan envisages the potential for ‘tall’ and ‘taller’ buildings on the site. As such, the principle of tall and taller buildings on this site is in line with the locational requirements set out in Part B of London Plan Policy D9. The site allocation does not prescribe any maximum or minimum heights. However, it does state that any proposed development should have due regard to the adopted Planning Brief SPD (2011) which is a material consideration but not part of the Development Plan. At up to 9-storeys the proposed scheme would exceed the recommended heights set out in the Planning Brief SPD. In terms of the criteria set out in Part C of London Plan Policy D9, the scheme would still harm heritage assets and impact locally designated river views and the surrounding townscape. These and other environmental and residential amenity impacts should be fully considered by the Council in its Planning Committee Report, taking into account the conflict with the heights set out in the Planning Brief SPD.</p>	Noted
Fire Safety (87)	<p>A fire statement has been prepared by a third party suitably qualified assessor and submitted as part of the planning application, as required by London Plan Policy D12. This sets out the proposed approach in terms of building construction, means of escape, passive and active fire safety systems and access and facilities for fire fighting</p>	<p>Noted.</p> <p>An updated Fire Statement and an updated Gateway One form have been prepared by Hoare Lea and is submitted in response to the detailed consultation</p>

Topic	GLA Comment (20 June 2022)	Applicant Response (18 August 2022)
	services. Sprinkler systems would be provided in all buildings and land uses. Further detailed fire statements would be provided and secured at Reserved Matters Stage. This information provided meets the requirements set out in London Plan Policy D12.	response received from the Health and Safety Executive (HSE), dated May 2022.
Inclusive Access (88)	The application would comply with the accessible housing standards in the London Plan Policy D7. This should be secured by condition. An inclusive design statement has been provided which details how the scheme would achieve a high quality of inclusive access throughout the land uses proposed and the detailed and outline elements.	Noted
Transport-Site Access (89 – 90)	The proposed vehicle access arrangements to the site are the same as was proposed in the previous application. Access to the eastern side of the site will be via Ship Lane and a new priority junction on Mortlake High Street immediately east of the entrance to the underground car park (opposite Vineyard Path). Access to the eastern side of the development will also be via Ship Lane with secondary access from Williams Lane. In addition, a new access road is proposed from Lower Richmond Road immediately east of the proposed school which connects to both Ship Lane and Williams Lane. Access to the school is also from this new road.	Noted
	Vehicular routing to the development site is limited by the presence of the River Thames to the north and the railway line to the south. Vehicles will predominately access the site via Lower Richmond Road/ Mortlake High Street from Chalkers Corner or from Sheen Lane via the A205 Upper Richmond Road.	
Healthy Streets	The proposed development will generate an increase in pedestrian and cycle trips to and from the site and the local area. The redevelopment of the site will see the creation of a new network of streets, which will significantly improve permeability and connectivity through the site. The vast majority of car parking is located at basement level, which would ensure streets are largely car free and pedestrians and cyclists have priority over other modes within the site.	Noted
	The proposals include a number of off-site improvements including new and improved zebra crossing facilities, a new signalised crossing	Stantec have investigated a scheme to include a signalised crossing on Clifford Avenue, located centrally

Topic	GLA Comment (20 June 2022)	Applicant Response (18 August 2022)
	<p>facility on Lower Richmond Road near the school, and improvements to the existing signalized crossing on Lower Richmond Road. Whilst the improvements identified will contribute towards the Healthy Streets and Vision Zero approach, the Transport Assessment (TA) and Active Travel Zone assessment highlights a key pedestrian and cycle desire line from the north west corner of the site across the A316 Clifford Avenue towards Kew (including Kew Gardens underground station). There is currently no formal pedestrian/cycle crossing facility on Clifford Avenue north of Chalker's Corner. Given the uplift in pedestrian and cycle movement generated by the development, a formal signalised toucan crossing facility would be of direct benefit to this development. TfL will therefore seek a contribution to deliver a crossing at this location.</p>	<p>of both northbound and southbound bus stops and adjacent to the access leading to Williams Lane. A concept design for the crossing is shown on drawing number 38262-5520-29.</p> <p>The applicant could agree to a contribution at this location however it should be noted that this would directly affect viability and could impact the affordable house provision and would need to be agreed with LBRuT.</p>
	<p>Furthermore, the TA also highlights a key pedestrian / cycle desire line along the A316 Clifford Avenue towards Chiswick Bridge. The TA refers to the TfL Quietway along the A316, however this scheme was never implemented. As a result, the current widths of the shared footway/cycleway along the A316 Clifford Avenue are unlikely to meet current design guidance standard for the expected pedestrian and cycle volumes, as there have been changes to the guidance since the original application. TfL recommend the applicant reviews the shared footway cycle way between Chalker's Corner and Chiswick Bridge to ensure it meets current standards and if not develop proposals to bring it up to current design standard.</p>	<p>Noted, see response immediately above.</p>
	<p>To improve road safety and pedestrian and cycle facilities, TfL have designed several proposed improvements within the A205 Upper Richmond Road / Sheen Lane junction. As the development proposal will generate additional vehicle, cycle and pedestrian movements through this area, a financial contribution of £228,878 towards the implementation of this scheme should be secured in the s106 agreement.</p>	<p>Noted</p>
	<p>Subject to securing the above, these improvements will contribute to the Mayor's Healthy Streets agenda for encouraging active travel and</p>	<p>Noted</p>

Topic	GLA Comment (20 June 2022)	Applicant Response (18 August 2022)
	<p>mode shift away from the private vehicle and therefore accord with London Plan Policy T2.</p> <p>A section 278 Agreement under the Highways Act 1980 is required to be secured for any works on the public highway. An updated Stage 1 Road Safety Audit will also be required for any changes to the public highway. The removal of TfL street trees requires agreement by TfL along compensation for the removed asset, this should be secured by condition.</p>	
Car Parking (97-99)	<p>A total of 516 car parking spaces are proposed on site, including 423 spaces for the residential uses. This equates to a car parking ratio of 0.39 spaces per unit. This represents a slight increase (16 spaces) compared to the called-in scheme. Most of the spaces are located within a basement car park. A further 15 spaces are proposed for the secondary school and 78 spaces for the non-residential uses on site. Whilst the proposed car parking for all uses is in accordance with London Plan Policy T6, it is not clear why the residential car parking provision has increased when compared to the called-in scheme given that the total number of units has reduced by 167. This should be clarified.</p>	<p>The increase in the number of parking spaces is related to the additional 16 townhouses that are proposed, which will have parking available off-street. The basement parking will remain the same size and deliver the same number of parking spaces.</p>
	<p>It is proposed that 20% of all car parking spaces will include active charging facilities with passive provision for all remaining spaces. This is acceptable. Residential disabled persons parking will be provided in accordance with London Plan policy, which requires provision for 3% of dwellings at the onset, with up to 10% provided should demand arise. 10% of the non-residential parking bays will be provided for disabled parking from the outset. An outline Car Parking Management Plan (CPMP) has been provided, the detailed CPMP should be secured by condition or via the s106 agreement.</p>	Noted
	<p>In order to prevent potential overspill car parking from the development, it is recommended that an extension of the existing CPZ's is considered to include all roads up to Chalker's Corner. It is recommended that all future residents are exempt from applying for</p>	Noted

Topic	GLA Comment (20 June 2022)	Applicant Response (18 August 2022)
	car parking permits and for this to be secured through an appropriate legal planning restriction.	
Cycle Parking (100-101)	The applicant is proposing a total of 2,413 long-stay cycle parking spaces on site, and a further 284 short-stay spaces for all elements of the development. This is in accordance with London Plan policy T5. 25% of the long-stay spaces will be provided as Sheffield stands, and 5% of these will be able to accommodate larger cycle. All cycle parking, and the provision of shower and locker facilities for the non-residential elements should be secured by condition along with a requirement to ensure that all cycle parking is designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS). A cycle hub for the non-residential uses is proposed within the basement car park. This should be secured by condition.	Noted
	The applicant has safeguarded an appropriate area of land that can be converted to cycle hire, should TfL's cycle hire network be extended to the site in the future, this should be secured in the s106 agreement	Noted
Trip Generation – Masterplan (102)	The applicant has used the same trip generation methodology used for the previous schemes. Given the date of the initial assessment, a sense check of the trip generation to ensure that it is using the most up to date survey sites and is still robust. The submitted methodology concludes that the revised development is likely to generate an additional 2,410 two-way person movements during the weekday morning peak (0800 to 0900), and approximately 1,983 two-way movements during the evening peak (1700 to 1800). Of these, it is predicted that There will be 328 two-way vehicle trips in the AM peak hour and 224 in the PM peak hour. This represents a slight increase (+2) in vehicle trips in the AM peak period and a slight reduction (-1) in the PM peak hour when compared to the called-in scheme. The majority of additional movements from the proposal are predicted to be public transport trips (1,012 two-way trips in the AM peak hour and 674 in the PM peak hour) and walking and cycling trips (977 two-way in the AM peak hour and 948 in the PM peak hour).	A sense check has been undertaken and the trip rates used are still the most up to date.

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Trip Generation – School (103)	The secondary school trip generation assessment has not changed from the called-in scheme and remains fit for purpose	Noted
Highways impact (104-106)	<p>The development is expected to generate a net increase of 328 two-way vehicle trips in the AM peak hour and 224 during the PM peak hour, including delivery and serving trips. 152 of the predicted two-way vehicle trips are associated with the school in the AM peak hour and 23 in the PM peak hour.</p> <p>In order to test the impacts of the vehicle trips generated by the development, detailed traffic network and junction modelling was undertaken as part of the original application assessment. LINSIG modelling software was used to support the original planning application, and VISSIM microsimulation modelling software, with a cordon taken from TfL’s strategic models for forecast years, was used for the revised and called-in schemes. This modelling was undertaken using 2017 traffic flows, as the emerging COVID situation meant more recent traffic survey data were not able to be collected for the called-in scheme, and was assessed alongside bespoke analysis to understand the impact of issues such as the Hammersmith Bridge closure. However, since the restrictions associated with the collection of new data was lifted in May 2021, TfL strongly recommends the assessment of this development reverts to standard practises and established methodologies, using recent survey data and the latest forecast assumptions as required by TfL VISSIM Model Auditing Process (VMAP) standards. It should be noted that this may take several months to complete.</p>	<p>See response provided by Stantec in their Technical Note titled ‘Traffic Data Comparison’ (TN048), dated July 2022 (Appendix C).</p> <p>A Technical Note (TN048) (Appendix C) has been prepared which includes details of several traffic surveys that were undertaken on a neutral weekday in June 2022, avoiding rail strikes and roadworks. They were then compared to the original surveys undertaken in 2017, which indicated that there is a general decrease in vehicle movements through all junctions studied as part of the approved VMAP work undertaken in 2021 in both the AM and PM peak periods.</p> <p>As the junction modelling assessment undertaken as part of the GLA application were based on the 2017 higher flows, it can be concluded that a worst-case modelling assessment has already been undertaken to assess the impacts of the Stag Development.</p> <p>It is therefore considered that the previous modelling work should still be considered satisfactory and robust, therefore, no further junction modelling is proposed at this time. However, it is noted, that prior to implementation of the Chalkers Corner scheme as part of the TMAN application, the study area will be re-modelled with VISSIM and follow TfL’s VMAP process using updated traffic surveys at the time the application is raised.</p>

Topic	GLA Comment (20 June 2022)	Applicant Response (18 August 2022)
	Additional comments may be issued by TfL once the modelling has been updated with new traffic data. It is for the local highway authority to comment on the suitability of the assessment and impact to the local highway network.	See response provided by Stantec in their Technical Note titled 'Traffic Data Comparison' (TN048), dated July 2022 (Appendix C).
Bus Capacity (107-108)	There are seven bus routes within walking distance of the site: 419,190, 209, 355, R68, N22 and 969, although it is noted the 969 only operates twice a week. The proposed development is predicted to generate a total of 663 two-way bus trips in the AM peak and 260 two-way bus trips in the PM peak hour. The majority of the predicted bus trips are associated with the proposed secondary school (510 in the AM peak hour and 65 in the PM peak hour). TfL have re-assessed the uplift in demand based on current capacity and conclude that additional buses would still be required to accommodate the predicted level of demand generated by both the revised development and secondary school. The revised development would potentially require 2 additional return journeys in both the AM and PM peak hours; and a further 8 school services in the AM peak hour and 2 in the PM peak hour to accommodate secondary school demand.	Noted
	A financial contribution of £3,200,000 is required to be secured to enhance bus services for the revised development. Of this amount £2,555,000 is to enhance bus services for the proposed secondary school. The contribution should be secured by the s106 agreement.	Noted
Bus infrastructure (109-112)	In order to facilitate the proposed development along Lower Richmond Road and Mortlake High Street, the applicant is proposing alterations to some bus stop locations along this corridor. Whilst TfL agreed the principle of these changes in 2016, TfL would recommend that the applicant reconfirms the length and widths of each stop and stand to ensure they meet TfL's current standards and include tracking with a 12m single deck rigid bus to demonstrate that they are accessible. The applicant should also provide tracking for the Sheen Lane mini roundabout to demonstrate that buses can still circumnavigate this roundabout in order to turn from the westbound side of the high street onto the eastbound side to access the bus stands. The applicant should	See response provided by Stantec in their Technical Note titled 'Assessment of Bus Stops' Rev TN046, dated 01/07/2022 (Appendix D).

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	also confirm that these stops and stands meet the TfL design standards for Accessible Bus Stops. The detailed design of these changes will still need to be agreed with TfL and this should be secured by condition or the s106 agreement.	
	During pre-application discussions for the original scheme, TfL were asked to investigate diverting route 209 to the Stag Brewery site. Whilst this was not considered to be a viable option, TfL did request that an area of land which can accommodate bus standing space for three vehicles and driver facilities should be safeguarded in the south west corner of the secondary school site to allow for future route extensions. It is noted that should TfL wish to utilise this land for the bus turning facility it would require a separate planning application.	Noted
	There is an existing bus stand on Mortlake High Street which accommodates standing for 3 buses. TfL would welcome discussions with the applicant as to whether there is an opportunity to deliver a bus driver facility to support these stands.	Noted
	The full cost to implement any changes to TfL's bus infrastructure must be met by the applicant.	Noted
Rail (113)	Mortlake Rail Station and the trains which serve it are operated by South Western Railway (SWR). It will be for Network Rail and SWT to comments on the potential impact of the development on Mortlake Rail Station, the train services which operate through it and the level crossing.	LBRuT confirmed on 28 June 2022 that Network Rail raised no objections, subject to the level crossing works.
Travel Plan (114-115)	Framework Site-Wide, Residential and School Travel Plans have been provided. The detailed Travel Plans should be secured, enforced, monitored and reviewed as part of the s106.	Noted
	As per the called-in scheme, TfL would recommend that in order to further encourage active travel and to ensure that the development achieves the strategic mode share targets (75% for walking, cycling and public transport) required for outer London, a monitor and manage approach is proposed during the phased buildout of the development. A Sustainable Travel Implementation Fund should be secured up to a capped value of £350,000. This will allow for the implementation of	It is not considered necessary to have the proposed Sustainable Travel Implementation Fund. The Applicant is in discussions with LBRuT re: financial contributions associated with s106 obligations.

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	measures, to ensure mode share targets are met. This should be secured in the s106 agreement.	
Delivery and Servicing (116)	A Framework Delivery and Servicing Management Plan (DSMP) has been submitted in support of the application and will form the basis of the detailed DSMP, which should be secured by condition.	Noted
Construction Logistics	A Draft Construction Logistics Plan (CLP) has been submitted with the application and a detailed version should be secured by condition. Careful consideration of constructions routes and access will be required as part of the detailed plan to minimise disruption including impacts on bus operations and journey times. Where possible construction traffic will avoid peak hours.	Noted
Energy Strategy (118-122)	Application A is expected to achieve a 77% reduction in carbon dioxide emissions over and above Building Regulations compliant development on the residential element, with a 60% reduction in carbon emissions expected on the non-residential element. Energy efficiency (Be Lean) savings of 10% on the residential and 11% on the non-residential element are expected. The remaining reductions in carbon dioxide emissions would be generated by renewable (Be Green) infrastructure comprising Air Source Heat Pumps and solar panels.	Noted
	In terms of compliance against London Plan Policy SI2, the scheme falls short of achieving the zero carbon target. The overall level of carbon dioxide emissions reductions would meet the minimum on-site requirements set in the policy and in terms of on-site energy efficiency measures for the residential element. The energy efficiency savings on the non-residential element fall short of the 15% minimum target in the London Plan.	It is worth emphasising that, although the target is not currently demonstrated for all non-residential areas of the site (Development Area 1 specifically where the shortfall is ~3% compared to the target) all residential elements of the scheme are able to demonstrate that the Be Lean target of 10% reduction can be met as well as exceeding the policy target for a 35% reduction in CO2 emissions on-site, demonstrating an overall 73% reduction (the previous scheme with CHP got to 42% overall). To demonstrate that the project is committed to responding to all policies in full, we invite a condition that requires further assessment post-planning, but pre-commencement, with a report demonstrating that the policy can be met for non-residential areas.

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	Turning to the school (Application B), the energy strategy would also incorporate Air Source Heat Pumps and energy efficiency measures. However, no solar panels are proposed which is disappointing, given that the roof layout indicates that there is additional space for solar PV. The energy efficiency savings would be 15%, with overall savings of 66%. This complies with the minimum on-site requirements but falls short of the zero carbon target.	In line with the policy, a minimum of 35% reduction must be demonstrated on site with remaining emissions to be offset via a one-off payment i.e. carbon offset payment. This approach has been presented within the strategy, therefore an approach to meet the zero-carbon target can be demonstrated.
	The energy strategy should be secured by planning obligation or condition. Carbon offset payments should also be secured. Whilst there are currently no opportunities currently to connect to an area wide District Heat Network in this location, the scheme should be future proofed to enable connection should this become possible over time.	Noted.
	London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen'). This should be secured.	Noted.
WLC (123)	A Whole Life-cycle Carbon Assessment has been undertaken in accordance with the London Plan. This reviews the embodied carbon emissions associated with the proposed development, taking into account the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated and compared to the GLA benchmarks. The report outlines a range of opportunities which could be undertaken to reduce the carbon associated with the development at the more detailed design stage when materials are being selected and specified. This further review should be secured through a pre-commencement condition. A post-construction monitoring report should be secured by condition for each phase.	Noted.
Circular Economy (124)	A Circular Economy Statement has been submitted which outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting re-usability, adaptability, flexibility and longevity. This is	Noted.

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	supported and complies with London Plan Policy SI7. Postconstruction reports are proposed by the applicant which would provide further details for each phase. This is acceptable and should be secured via a planning condition.	
Urban greening, trees and biodiversity (125-128)	Policy G5 of the London Plan requires new development to contribute towards urban greening. Policy G7 requires development proposals to ensure that, wherever possible, existing trees of value are retained and that the loss of trees as a result of development is mitigated through the provision of replacement trees of an adequate value. Policy G6 states that development proposals should manage the impact on biodiversity and aim to secure net biodiversity gain.	Noted.
	A range of urban greening methods are proposed as part of the applicant's landscape strategy. This includes amenity grassland, flower rich perennial, hedge tree and meadow planting areas, rain gardens and green roofs. The applicant has undertaken an Urban Greening Factor (UGF) assessment which demonstrates that the scheme would achieve an overall UGF score of 0.28 across the entire site. Application A would ensure 0.3 UGF score	Noted.
	The UGF score for the school (Application B) is 0.22. This falls considerably short of the 0.4 target in the London Plan. This is brought down by the 3-G sports pitch and MUGA which are counted as permeable surfaces for the purpose of the UGF assessment. The assessment is also not able to take into account the design detail of the school's green roof, as this has not yet been designed in the required level of detail. The applicant has also stated that the overall score is affected by hardlandscaped public squares within the proposed masterplan, at Maltings Plaza and Botlings Square, which are considered essential to enable events and markets. This was considered acceptable in the GLA's Stage 3 report and the details of the application have not changed in this respect, so the overall conclusion of GLA officers is the same on this application.	Noted.
	In terms of trees, the proposed scheme would result in the loss of 50 trees, including 2 Category A trees and 24 Category B trees as outlined	Noted.

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	below. To mitigate this, the scheme proposes 402 new trees. The majority of the trees to be removed are within the heart of the site to the rear of residential homes along the Thames Bank to enable the construction of Blocks 18, 20 and 21 and adjacent to the existing Watney's Sports Ground where the new school would be located. The existing trees including the mature London Plane trees along Ship Lane would be retained, as would the mature trees along the Thames Path.	
Sustainable drainage and flood risk (129)	The site is located within Flood Zones 2 and 3 and is protected by the River Thames flood defences. The development would involve replacing and upgrading the flood defence wall which forms the north east boundary of the site with a new wall to 6.7 metres AOD. Flood risk would be managed and mitigated through raised levels, improved flood defence walls and evacuation routes. The surface water drainage strategy for the site comprises a variety of Sustainable Urban Drainage (SUDS) methods such as attenuation tanks, permeable paving, rain gardens, green/brown roofs and areas of permeable soft landscaping within the site. The approach to flood risk management and drainage mirrors the previous planning application which was considered acceptable by the Environment Agency, Richmond Council and GLA officers.	Noted, in line with LBRuT comments, runoff that discharges from the Site to the Thames Water sewer network has been further reduced to achieve the greenfield runoff rate.
Air quality (130-133)	London Plan Policy SI1 states that development proposals should not lead to further deterioration of existing poor air quality and should not create unacceptable risk of high levels of exposure to poor air quality. New development is expected to be at least air quality neutral, with EIA development required to provide an air quality positive statement outlining how local air quality can be improved. Development proposals within Air Quality Focus Areas such as this should demonstrate that design measures have been used to minimise exposure.	Noted.
	The entirety of the borough is covered by an Air Quality Management Area. In addition, Chalkers Corner / Clifford Avenue / A205 / Lower Richmond Road is one of 187 identified Air Quality Focus Areas in London that exceed the objective limits for NO2 and have high levels of	Noted.

Topic	GLA Comment (20 June 2022)	Applicant Response (18 August 2022)																	
	human exposure. The applicant's Air Quality Monitoring Report confirms that the UK objective levels for NO2 are exceeded at Chalkers Corner, Clifford Avenue and along Lower Richmond Road but reduce within the site.																		
	The applicant's Air Quality Positive Statement outlines a range of measures in which impacts on local air quality would be minimised, including measures to mitigate and manage dust and emissions during demolition and construction; through the low carbon energy strategy which incorporates Air Source Heat Pumps, electric vehicle charging infrastructure and measures to limit and discourage car use, alongside highways works to Chalkers Corner to alleviate traffic congestion.	Noted.																	
	The applicant's Environmental Statement states that air quality modelling undertaken shows that the development would not give rise to a significant air quality effect that would adversely affect the occupants of existing buildings surrounding the site or future residential and school users within the development. However, from the assessments undertaken it is unclear whether or not the application as a whole would achieve air quality neutral standard in terms of building emissions and transport emissions and what mitigation measures are required. Mitigation measures in respect of air quality should be clarified.	<p>Appendix 10.2: Air Quality Neutral Calculations concludes the Development is considered to be 'Air Quality Neutral', with respect to building and transport emissions. The Development refers to the application as a whole.</p> <p>To ensure clarity – the Air Quality Neutral calculations have been re-calculated using the Air Quality Neutral Consultation draft, November 2021. Building emissions were discounted as the Development would not include new combustion plant.</p> <table border="1" data-bbox="1289 1112 1944 1399"> <thead> <tr> <th rowspan="2">Land Use</th> <th rowspan="2">GIA</th> <th colspan="2">Benchmark</th> <th rowspan="2">Development trips per annum</th> </tr> <tr> <th>Trip Rates Outer London</th> <th>TEB</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>1085</td> <td>447</td> <td>484995</td> <td>452,965</td> </tr> <tr> <td>Office</td> <td>4547.0</td> <td>16</td> <td>72752</td> <td>143,810</td> </tr> </tbody> </table>	Land Use	GIA	Benchmark		Development trips per annum	Trip Rates Outer London	TEB	Residential	1085	447	484995	452,965	Office	4547.0	16	72752	143,810
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		<table border="1"> <tbody> <tr> <td>Flexible Use</td> <td>4839.0</td> <td>16</td> <td>77424</td> <td>111,690</td> </tr> <tr> <td>Hotel</td> <td>1765.0</td> <td>6.9</td> <td>12178.5</td> <td>5,110</td> </tr> <tr> <td>School D1 C-H</td> <td>9319.0</td> <td>44.4</td> <td>413763.6</td> <td>97,000</td> </tr> <tr> <td>Leisure (D2) A-D</td> <td>1606.0</td> <td>47.2</td> <td>75803.2</td> <td>59,860</td> </tr> <tr> <td></td> <td><b>23,161</b></td> <td></td> <td><b>1,136,916</b></td> <td><b>870,435</b></td> </tr> </tbody> </table> <p>As shown in the Table above, the 870,435 annual vehicle trips generated by the Development would be lower than the TEB of 1,136,916. As set out in the submitted ES, the Development is 'Air Quality Neutral' in relation to transport emissions. The changes to the methodology set out in the Air Quality Neutral Consultation draft, November 2021 result in no material change to these findings.</p>	Flexible Use	4839.0	16	77424	111,690	Hotel	1765.0	6.9	12178.5	5,110	School D1 C-H	9319.0	44.4	413763.6	97,000	Leisure (D2) A-D	1606.0	47.2	75803.2	59,860		<b>23,161</b>		<b>1,136,916</b>	<b>870,435</b>
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Hotel	1765.0	6.9	12178.5	5,110																							
School D1 C-H	9319.0	44.4	413763.6	97,000																							
Leisure (D2) A-D	1606.0	47.2	75803.2	59,860																							
	<b>23,161</b>		<b>1,136,916</b>	<b>870,435</b>																							

### Appendices

- A. 'Impact of reduction in basement on scheme viability', prepared by BNP Paribas, dated 28 July 2022.
- B. Townscape Briefing Note, prepared by Montagu Evans, dated 9 August 2022.
- C. Concept design for Clifford Avenue crossing, prepared by Stantec, drawing ref: 38262-5520-29.
- D. 'Traffic Data Comparison' (TN048), dated July 2022, prepared by Stantec.
- E. 'Assessment of Bus Stops' (TN046), dated 1 July 2022, prepared by Stantec.