

Former Stag Brewery

London Borough of Richmond Upon Thames Consultation: Applicant Response

The table below sets out the Applicant's response to the comments received in respect of the applications for planning permission at the Former Stag Brewery site: Application A: for masterplan redevelopment (ref: 22/0900/OUT) and Application B: for a new secondary school (ref: 22/0900/OUT) on 27 May 2022 from the London Borough of Richmond upon Thames (LBRuT).

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

Application A (ref: 22/0900/OUT)

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
1. Policy			
1	a. Heads of Terms <ul style="list-style-type: none"> i. Employment and Skills Plan ii. Community Use Agreement, same as previously discussed. iii. The outline Heads of Terms included in the Planning Statement, albeit that the details will be subject to further discussion. 	Further discussions to take place.	
2	B. Conditions to secure: <ul style="list-style-type: none"> A. Commercial and retail mix within the site. B. Retail within the High Street Zone C. Minimum cap for offices within the flexible floorspace (of 4,839sqm), at 2,000sqm. 	Agreed. It should be noted that as a result of the design response required to the HSE's comments, the flexible use area has now decreased in size to 4,784 sqm (GIA). The floorspace 'caps' presented in the original submission (March 22) remain valid.	Y – updated High Street Zone Plan. Y- Retail and Leisure Statement Addendum, prepared by RPS.

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3	C. Affordable housing i. First Homes need to be considered	See excel spreadsheet, dated 30 May 2022, prepared by BNP Paribas, was issued to LBRuT on 13 June 2022 (Appendix A).	Y – spreadsheet issued.
2. Urban Design			
4	<p>Masterplan</p> <p>a) It is felt that there is scope to adjust the Masterplan to respond to the main pedestrian route from the station.</p> <ul style="list-style-type: none"> o Block 6 and the Green Link should be adjusted so that people coming from the station will view towards the Maltings. Adjusting block 6 would also have necessitated adjusting blocks 1, 2 & 7 to make a meaningful improvement. o This would also have benefits for the cinema block which does not work as a 'block'. 	<p>Squires have provided the following response:</p> <p>At DRP2 it was shown that it is not possible to view the Maltings from the approach from the Station, even if Building 6 was altered. The cinema is a standalone building, justified in the DAS as such and is a building not a block. This arrangement has not changed since the original application which was considered acceptable to LBRuT.</p>	
5	b) The other area where the Masterplan could be better considered is block 10. The route from the basement car park is very contorted. A more meaningful route would have brought the exit to the car park into Bulls Alley where traffic lights could have been installed to deal with traffic emerging into Mortlake High Street.	Squires have provided the following response: “The access into Building 10 for the basement car park was carefully considered and requires a long building to be able to incorporate the ramp. This would not have been possible in Building 9 to give	

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		<p>access to Bulls Alley. Again this arrangement has not changed since the original application which was considered acceptable to LBRuT.”</p> <p>Stantec: The current arrangement is shown to work in terms of geometry and meet all visibility requirements.</p>	
6	<p>Height, Scale and Massing</p> <p>c) Building 10 looks unbalanced and somewhat over scaled. This would be less than substantial harm to the adjacent BTM and conservation area. It is recommended that Block 10 be a storey lower.</p>	<p>Squires have provided the following response: “There are not detailed reasons provided to lower Building 10 which we consider does not look out of scale in the illustrative views and which is acceptable in Waterman’s Townscape Assessment. However, we have lowered Building 10, so that it is as the previous application. This is beneficial to the relationship with the BTM adjacent.”</p> <p>See full details within the Design and Access Statement (DAS) Addendum, prepared by Squire & Partners for further design details.</p>	Y – DAS Addendum and drawings

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7	<p>Building 1 - Cinema d) The office entrance to the west elevation appears rather mean and not celebrated.</p>	<p>Squires have provided the following response:</p> <p>“The office entrance has been moved from the corner of Ship Lane to be more central to the facade of the office reception. This also provides a clear relationship between the cinema entrance on one side of the building and the office entrance now in a similar location on the opposite side of the building. The office entrance has also been marked out by the introduction of a small canopy, finished in bronze metal to match the rest of the building.”</p> <p>See section 2.5 of the DAS Addendum, prepared by Squire & Partners for further design details.</p>	Y – DAS Addendum and drawings
	e) Elevations rather uninspiring and a floor higher than originally proposed.	<p>Squires have provided the following response:</p> <p>“It is a floor higher to accommodate the office accommodation above the</p>	Y – DAS Addendum and drawings

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		<p>cinema. It provides a simple form which can accommodate both uses and contrast with the other building types, as set out in the DAS and very similar to the original concept for the cinema design from the original application which was considered acceptable to LBRuT.”</p> <p>See section 2.5 of the DAS Addendum, prepared by Squire & Partners for further design details.</p>	
	f) Recommend the roof treatment being lower in relation to the nearby BTM PHs	<p>Squires have provided the following response:</p> <p>“This was looked at carefully and the design altered to reduce the impact of the upper floor including lowering the height of the top floor. We have further lowered the overall height of the top floor and reduced it’s footprint by increasing the setbacks from the façade beneath. This further improves the</p>	Y – DAS Addendum and drawings

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		<p>relationship with the adjacent BTM.”</p> <p>See section 2.3 of the DAS Addendum, prepared by Squire & Partners for further design details.</p>	
8	<p>Building 2, 3, 7, 8, 9, 10, 11, 12</p> <p>g) The proposed elevations to the Mansion Block typology generally feel very dominated by brick. Whilst a simple palette is supported some variation is recommended:</p> <ul style="list-style-type: none"> • Consider different blends to give more subtlety of colour and texture. • Could the residential entrances be more celebrated? 	<p>Squires have provided the following response:</p> <p>“As set out in the DAS different brick blends are considered and will be part of the conditions submission. Also noted in the DAS is the highlighting of residential entrances with white GRC surrounds to give them more prominence and ‘more celebrated.’”</p> <p>See page 9 of the DAS Addendum, prepared by Squire & Partners for further design details.</p>	Y – DAS Addendum and drawings
	h) Recommend the use of GRC for gables and celebrating entrances.	The use of GRC is noted in the DAS and illustrated as such, noting it will form part of a conditions submission	N

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9	<p>Building 6</p> <p>i) The entrances should be better celebrated.</p>	<p>The inclusion of GRC surrounds can also be the case for Building 6 entrances.</p> <p>See page 9 of the DAS Addendum, prepared by Squire & Partners for further design details.</p>	Y– DAS Addendum and drawings
10	<p>Assessment of Views from DAS</p> <p>j) From Lower Richmond Road towards Cinema; from Mortlake Green; Looking west from Lower Richmond Road: The roof height of the cinema block looks somewhat dominant, if lowered this could aid the relationship to nearby BTM PHs.</p> <p>k) New High Street: the 'carriageway' section paving looks rather monotone 'carriageway' as shown, however other visualisations in the Landscape DAS have more variation. Please clarify</p> <p>l) Bottleworks Square: More softer elements are shown in the Landscape DAS.</p> <p>m) River view towards Riverside Square: the very tall lighting poles indicated too utilitarian (and tall). The appearance of the square looks low on seating provision.</p>	<p>Squires have provided the following comment:</p> <p>“As noted above the roof has been lowered. However this is an office floor that requires a minimum floor to ceiling height, so the reduction is as much as can be accommodated.”.</p> <p>The landscape DAS is more detailed and is correct. This has now been amended in CGI images in the DAS.</p> <p>The landscape DAS again is the proposed design, the views are more illustrative of activity.</p> <p>The tall lighting poles are to provide good lighting spread to make the space appealing and safe at night. More seating could be provided but equally</p>	

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		the square is seen as one of activity and being able to accommodate large crowds for viewing the boat race, where too much seating could pose a risk. These elements would be part of a condition. More planting has been added to the square edges.	
	n) From Sheen Lane: would be beneficial to have a muted/ recessive brick finish for the mansion block visible behind the hotel.	The final brick finish will be subject to condition but is noted.	
11	Public Realm and Landscape o) Provide additional seats to river frontage. p) Provide more greenery within Development Area 1 – this would aid the UGF	Can be dealt with via planning conditions.	
12	Landscape Masterplan/DAS q) Planting strategy: Incorporate softer elements within the hard paved areas- such as is shown in the visualisation for Bottling Square. r) Public art - it is appropriate for such a large scheme that a strategy is considered for this. No issues with proposals to be developed, which may include, in addition to heritage assets, art installations, 'Heritage Celebration', riverside art trail, retention of sections of river wall. s) Maltings Plaza: Concerns over the tall light columns, lack of seating and space at the rear of the Maltings looking rather dull. Recommend a softer approach. t) Towpath: Provide more background on which sections of the wall are retained or not.	Can be dealt with via planning conditions.	
13	Lighting masterplan	Can be dealt with via planning conditions.	

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	u) The lighting proposed for the maltings Plaza will need careful consideration as it looks a bit too much like sports facility floodlighting. More consideration needed there.		
14	Conditions / s106 obligations suggested	Please can these be provided.	
3. Heritage			
15	<p>The following harms have been identified:</p> <p>a) setting of the Maltings and the character and significance of this part of Mortlake CA33 as the skyline will change and the new buildings will appear more dominant behind the BTM</p> <p>b) The height of the proposed blocks, will result in some harm to the setting of the listed buildings and the BTMs within the CA on Thames Bank, and on the significance of CA33 when seen from viewpoints on the river, opposite bank and Chiswick Bridge.</p> <p>c) Boundary/perimeter walls to eastern section of site - There will be some harm caused by the removal of boundary walls and remains of buildings along Mortlake High Street, and therefore to the significance of this part of Mortlake</p>	<p>Setting of BTM and Listed Buildings addressed in the DAS and has improved with reduction in massing to Building 1 and 10.</p> <p>See separate Townscape Briefing Note, prepared by Montagu Evans, dated 9 August 2022. (Appendix B).</p> <p>Some of the boundary wall is kept at low level to the north and this has not changed since the original application which was considered acceptable to LBRuT.</p> <p>See separate Townscape Briefing Note, prepared by Montagu Evans, dated 9 August 2022 (Appendix B).</p> <p>See separate Montagu Evans Briefing Note, dated 9 August 2022 (Appendix B).</p>	

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	CA33 due to the loss of historic fabric which is of both historical and architectural interest.		
	d) Building 10 unbalanced and overscaled, impacting upon adjoining BTMs and conservation area.	Noted above and responded to in the DAS and Townscape Assessment. See separate Montagu Evans Briefing Note, dated 9 August 2022. (Appendix B).	
16	Recommended changes • Cinema – roof treatment lower	See response provided to part d above.	
	• Bottling plant – some of columns should be re-used in the new flexible interior space on the ground floor	As reported in the ES (paragraph 15.56), a number of the internal cast iron columns within the former Bottling Building would be retained as part of the Development and relocated across the ground, first and second floors of the building. Squires: Although we may agree to retain some of the existing columns these may not be able to be used and we have no data on their	

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		structural integrity or capacity. We could look to use these in common parts of the building as non-structural elements, similar in principle to the reuse of the existing external brewery gates.	
4. Affordable Housing			
17	Affordable housing provision falls well short of the strategic 50% target - Further negotiation concerning scheme viability and the inputs that sit behind this is therefore required to seek the maximum affordable housing provision that can be viably provided on site.	See note prepared by BNP Paribas, dated 28 July 2022.	
18	The content and quantum of Affordable Housing i. Inconsistency between Planning Statement and FVA in terms of affordable housing	Documents are consistent. For explanation on the drafting of the FVA, see note prepared by BNP Paribas, dated 28 July 2022. In terms of the Town Planning Statement, paragraph 10.19 states: <i>The final level of affordable housing for the Scheme is the subject of ongoing viability discussions. However, for the purpose of assessing the scheme in terms of Environmental Impact, the scheme parameters have tested a</i>	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)																								
	<p>Planning Statement</p> <ul style="list-style-type: none"> 1085 new homes in total 20% affordable based on unit number 213 affordable homes comprising 165 London Affordable Rent (LAR) and 48 intermediate homes. proposed unit and tenure mix; <table border="1" data-bbox="527 597 779 911"> <thead> <tr> <th></th> <th>LAR</th> <th>Intermediate</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>1-bed</td> <td>12</td> <td>27</td> <td>39</td> </tr> <tr> <td>2-bed</td> <td>63</td> <td>21</td> <td>84</td> </tr> <tr> <td>3-bed</td> <td>84</td> <td>-</td> <td>84</td> </tr> <tr> <td>4-bed</td> <td>6</td> <td>-</td> <td>6</td> </tr> <tr> <td>Total</td> <td>165</td> <td>48</td> <td>213</td> </tr> </tbody> </table> <p>FVA</p> <ol style="list-style-type: none"> 1085 new homes in total 15% affordable based on unit number 167 affordable homes comprising various tenure mixes outlined for viability testing purposes. 		LAR	Intermediate	Total	1-bed	12	27	39	2-bed	63	21	84	3-bed	84	-	84	4-bed	6	-	6	Total	165	48	213	<p><i>maximum quantum of 22% affordable housing (by habitable room) based on an identified tenure split. This equates to up to 213 affordable units. The scheme is currently tested on the basis of 77% of units being provided as social rent and 23% as intermediate.</i></p>	
	LAR	Intermediate	Total																								
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	<p>ii. Require confirmation that RHP / RP have had the opportunity to comment in detail on the latest iteration of the proposals, not just for the purposes of financial viability testing, but also to ensure that they are comfortable with the revised layouts of the residential elements of the scheme to support the efficient management of the homes and to ensure that service charges are affordable to future residents.</p>	<p>See a letter from RHP, dated 15 June 2022, issued to LBRuT on 16 June 2022 (Appendix C).</p> <p>See also, note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).</p>																									

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19	<p>b) Financial Viability</p> <p>i. The final content of the affordable housing to be delivered is dependent on ongoing discussions regarding viability</p>	Noted	
	<p>ii. The following are noted from a review of the submitted FVA;</p> <ul style="list-style-type: none"> o Section 4.11 - states that the final sales will complete 12 months after completion. This seems unusual for a London location where sales to date have been extremely strong and many (particularly private) homes are sold off plan. Scrutiny of sales processes and the timing of income for the developer should be undertaken as this may have an impact on the on-going viability of the scheme (particularly with regard to potential Review Mechanisms). o Development phasing – further consideration should be given to the phasing of the scheme development and how it relates to wider scheme viability. As it currently stands the first phase development delivers a significant proportion of private homes, with only 48 intermediate homes being delivered. All of the affordable rented homes are being delivered in the later phase. The proposed phasing is not acceptable given the significant level of market housing proposed in the detailed Phase 1, the low level of affordable housing proposed in Phase 1 and the absence of any affordable rented housing in this Phase <p>Further detail / justification is required to understand further the Phasing timescales for both the school application and Phases 1 and 2 and whether there is any overlap on when these phases commence on site and complete</p>	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	

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	iii. Should an agreement on scheme viability be reached the appropriate viability review clauses should be included within any s106; o Pre-commencement review to allow the consideration of whether the addition of Council grant funding could deliver an enhanced affordable housing offer.	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
	o Pre-implementation – if development has not occurred within 24 months. o Mid Stage Review – Potentially at 80% completion of Phase 1 o Late-Stage Review – At the sale of 75% of the open market homes	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
20	c) Phasing i. The timing of the affordable units must be secured in the S106 agreement, to ensure early completion of the affordable homes in Phase 2	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
	ii. The following concerns are raised that need to be resolved prior to decision: o lack of clarity of when the affordable housing would be provided and the trigger for affordable housing provision being built and completed	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
	o Currently 48 intermediate homes are to provided in Phase 1, with the remaining 165 general needs rented homes affordable homes to be completed in Phase 2. The significant back ending of the affordable housing delivery is a risk o Recommend: <ul style="list-style-type: none"> ▪ some rented homes within Phase 1 – Building 10? ▪ early phasing of delivery of the affordable housing in Phase 2 is also secured 	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	

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	iii. The scheme must be subject to viability reviews in accordance with the Mayor's Affordable Housing and Viability SPD and the Council's Affordable Housing SPD in order to review the viability of providing affordable housing: <ul style="list-style-type: none"> ▪ prior to first start on site, ▪ prior to start on site of the second phase on approval of a detailed scheme ▪ final scheme review given the level of affordable housing 	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
21	d) Tenure, Rents and Affordability i. Concerns of the unit and tenure mix reflected in some of the options in the FVA, particularly where they depart from the 80/20 rented/intermediate split outlined in Local Plan policy. Any mix that proposes a significant proportion of intermediate homes will be resisted.	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	See separate note.
	ii. Recommend discussions to ascertain whether the number of LAR homes can be improved through further viability negotiations and/or with the support of the Council's Housing Capital Funding.	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
	iii. Request confirmation that genuinely affordable housing is being delivered including accounting for service charge levels that would be due. (It is noted LAR/social rent is exclusive of service charges and these may be a significant additional cost)	During the design phase consideration has been given to the service charge implications of the design for Building 10, and future affordable blocks. Building 10 has it's own entrances, and the internal demise will be managed by the RP partner, to allow them to control their own costs.	

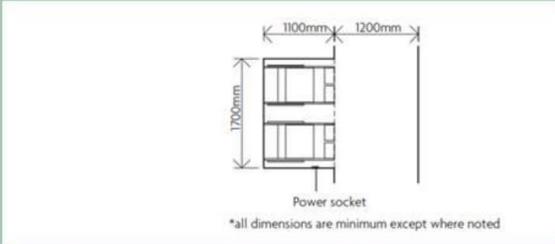
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		<p>This would ensure that there are no excessive service charges for services shared with other tenures/uses.</p> <p>There was no adverse comment from RPs regarding service charges when consulted, beyond an understanding that estate charges would need to be managed carefully.</p> <p>See also letter provided by RHP, dated 15 June 2022. Issued to LBRuT on 16 June 2022 (Appendix C).</p>	
22	<p>e) London Affordable Rented Housing</p> <p>i. London Affordable Rented homes are proposed as the tenure for the general needs rented elements of the scheme. However, the new Affordable Homes Programme 21-26 promotes social rent as the preferred general needs tenure, and as such the availability of grant funding to support this scheme (and in particular any grant for additional affordable housing over and above that identified within the FVA) may be limited. It should also be noted that as a scheme referable to the London Mayor the GLA are likely to promote social rent as the preferred tenure.</p>	<p>Social rented housing could be accommodated within the Proposed Development.</p> <p>This would attract a lower capital value, so the overall percentage of affordable housing would fall as a result.</p>	

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	ii. As part of the viability discussions consideration is given to social rent as the preferred tenure for the general needs rented homes.	This is the subject of ongoing discussions with LBRuT.	
23	<p>f) Intermediate Housing</p> <p>i. The application seeks to offer a mix of both shared ownership and London Living Rent homes. However, it should be ensured that any intermediate homes remain genuinely affordable to Richmond residents, and to secure this the homes should meet the requirements of the Intermediate Housing Policy Statement. For clarity the following are required:</p> <ul style="list-style-type: none"> • two thirds of all intermediate homes are affordable to those on household incomes of up to £50,000 per annum with the remaining third affordable to those on household incomes up to the GLA intermediate housing threshold of £90,000 per annum for shared ownership • The applicant/RP demonstrates affordability of sales in each scheme at an average household income of £56,200, • The applicant/RP are required to demonstrate in marketing plans prior to launching sales that two thirds of the homes are affordable at gross household incomes of below £50,000 	See note dated 13 June 2022, prepared by BNP Paribas. Issued to LBRuT on 13 June 2022 (Appendix A).	
	ii. These affordability requirements should be cross-checked as negotiations on scheme viability progress to ensure that the assumed values for shared ownership homes accurately reflect these affordability requirements.	All points consistent with previous iterations and have been accounted for.	
	iii. Any future S106 agreement must incorporate clauses that ensure the Council's adopted affordability criteria for shared ownership and intermediate rent homes is to be complied with.	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	

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	<p>g) Service Charges</p> <p>i. Overall housing costs should be affordable to the Council's income threshold for intermediate as well as those which would be assumed for general needs rent.</p> <p>ii. Provision should be made in any Section 106 to secure affordability having regard to confirmed service charge levels.</p>	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
24	<p>h) Wheelchair Accessible homes - s106 to ensure:</p> <p>A. Council's minimum requirement for 10% of the units are to be provided and to ensure compliance with M4(3)</p> <p>B. enable the Specialist Occupational Therapist to liaise with the developer in order to ensure that the identified homes are constructed to Building Regulation requirements (M4(3)(2)(b).</p>	Plans have been reviewed and updated to ensure that 10% of the units in Buildings 18 and 19 are compliant.	Y – updated plans.
		Noted	
25	i) Amenity Space - Details of the arrangements for the management of the communal amenity areas to avoid segregation and to ensure that all residents of affordable housing blocks have access to amenity space areas should be secured in the Section 106 agreement.	Noted	
26	j) Parking - Confirmation that the parking for the wheelchair homes is genuinely accessible for the end user is required.	All parking for wheelchair homes is fully and genuinely accessible	
27	<p>k) Public Grant funding</p> <p>i. Need for discussions prior to determination with the aim of the adjusting the approved affordable housing (unit numbers and/or tenure mix) with public grant (Richmond Housing Capital Programme funding)</p>	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	

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	ii. review mechanisms developed to consider both the level and tenure mix of affordable housing delivered to achieve a better level of policy compliancy.	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
	iii. review to assess the impact of Council Housing Capital Grant support (if not confirmed prior to determination) to improve the number of affordable units and/or to improve the tenure mix.	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
28	<p>l) s106 requirements</p> <p>i. affordability of the intermediate housing across a range of household incomes through the share purchased and the level of rent on the unsold equity including a requirement that the Registered Provider should set the equity share and rent on the unsold equity in order to achieve the Council's requirement that homes are affordable for a household income of £50,000.</p> <p>ii. confirmation the affordability of all the affordable homes takes account of service charges.</p> <p>iii. Review clauses to increase both numbers and increase in the number of homes for Affordable Rent so the scheme meets a tenure mix which is more compliant with Local and London Plan requirements) through the application of Richmond Housing Capital Grant funding and through review mechanisms:</p> <p>iv. Ensuring that the inputs, including deficit position, are fully evidenced and tested.</p> <p>v. An Early Stage Review if the planning permission is not commenced within and agreed timescale.</p> <p>vi. A Public Grant Review prior to commencement to assess the potential for public grant (both Mayoral and from the Council's Housing Capital Programme) to increase the amount and/or alter the tenure of the affordable housing to improve affordable rented delivery.</p> <p>vii. residents' access to the proposed communal areas</p> <p>viii. Consultation and engagement with Council's Specialist Occupational Therapist</p>	See note prepared by BNP Paribas, dated 28 July 2022 (Appendix D).	
	5. Housing - Accessible		

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29	A. Design and Access Statement - Confirm power assisted doors will be fully automatic to cater for a wide variety of needs	Power assisted doors will be incorporated.	
30	B. Schedule of accommodation for the affordable homes (although these only state 'potential social rent', no intermediate?): <ul style="list-style-type: none"> • Building 18 (potential social rent): 7x 3b6p & 1x 2b4p • Building 19 (potential social rent): 4x 1b2p & 1x 2b4p i. All these homes are a suitable size as M4(3) homes. However:	See Squires' responses below.	
	<ul style="list-style-type: none"> • too many 3b6p homes. Request 2 less 3b6p and more 2b4p. 1b2p numbers are suitable. 	This is in outline and the final mix will be determined in Detail but further M4(3) wheelchair accessible apartments have been identified to get 17 total in B18/B19 which equates to 10%.	
	<ul style="list-style-type: none"> • There should be 17x M4(3) homes (to be at least 10%) but there are only 13 shown on this schedule. 	This is in outline and the final mix will be determined in detail but further M4(3) wheelchair accessible apartments have been identified to get 17 total in B18/B19 which equates to 10%.	Y- updated plans.
31	C. Plans: i. The homes are a good size, although some are an awkward shape. ii. The plans will need to be adjusted and also apply the same principles to the social rent homes when they complete those plans: a) check locations of wheelchair charge spaces: to ensure that they do not encroach on corridor width. Most are not compliant – they block	Noted – can be dealt with at RMA stage.	

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	<p>hallways completely, reduce widths of hallways, block doorways or block storage cupboards). It is suggested you check M4(3) to see how this should be positioned –imagine that 2 wheelchairs are sitting in the dedicated wheelchair charge space (which cannot be shared with any other space), and then need 1200mm space next to the charge space (the same width as the rest of the hallways, to enable a wheelchair user to turn into the space) – see below:</p>  <p>Diagram 3.6 Wheelchair storage and transfer space</p> <ul style="list-style-type: none"> b) space inside front door: the 1800x1500 space is not always the correct way round (check M4(3) for details) c) door nibs: some of these do not comply with M4(3) d) ensure they include ALL furniture which Part M requires e) accessible layouts: both adaptable and accessible layouts should be provided f) balconies: need to show balconies and compliant turning spaces (and all doors onto balconies also need to achieve clear opening width of 850mm) 		
32	<p>D. Inclusive and Accessible Design Standards:</p> <ul style="list-style-type: none"> i. The applicant is encouraged to apply the same standards throughout on the M4(2) home designs or the private dwellings. ii. The applicant is recommended to complete the M4(2) and M4(3) checklists (and continue to do so at various design stages) which will help to ensure that the development meets all the requirements 	Noted	

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Ecology			
33	<p>A. Ecology reports (PEA and PSR dated March 2022) - Surveys have all been carried out in October 2021 – therefore not following their own (or the BCT 2016 guidance) recommendations (para 5.18 of the PEA dated March 2022) for surveys to be carried out either 2 with a two week break or monthly for 3 months (between May to August). The Protected Species report (para 2.15) states that the reason for this is due to the previous planning application programme hearing in July 2021, it then goes on to say that this is not a constraint due to the historical surveys carried out “providing a robust baseline data” and “further surveys will be carried to determine if amendments are necessary to the mitigation measure currently being proposed and to inform a licence application for NE”. However, each survey is respectfully 3 years, 1 month and 2 years, 1 month apart, which is out of date and not as per the guidance.</p> <p>i. Internal surveys are still not supplied despite the availability of drones and other technology that could assist.</p> <p>ii. The Dec 2019 EIA has the Maltings wrongly numbered as B9 not B8.</p> <p>iii. The LPA expect a fully compliant suite of bat surveys over the summer period for a site of this complexity and size adjacent to the River Thames in the north and connecting to the railway and beyond in the south. The survey report needs to contain raw data and a plan to show the movement of bats seen on site.</p> <p>The LPA cannot assess or comment on these applications fully without the relevant and in date surveys, therefore have no alternative but to recommend refusal due to lack of Protected Species information at this time.</p>	Ecological surveys being undertaken on site over summer 2022. Scope of surveys was discussed and agreed at a meeting dated 6 July 2022.	Y – to be prepared
34	<p><u>Other comments:</u></p> <p>B. Demonstrate the new windows/internal light spill will not spill onto the river corridor or tree canopies, especially as brown long-eared bats have been recorded.</p>	Given the final lighting design has not been designed at this stage, we would expect this to be dealt with via a condition	

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		<p>for the final lighting design to be mindful of light spill to the river with lighting designed in compliance with the guidance published by the Institute of Lighting Professionals (ILP).</p> <p>This is as anticipated within the ecology chapter (para 13.149).</p>	
	<p>C. Is there any reason why the meadow grassland by the school is not be included in the public realm area? What will the school be using it for? This would be a great addition to the public.</p>	<p>It is included. see - P10736-00-004-0701-03 Amenity Space and Green Space Calculation</p>	
	<p>D. Uplighting of trees and buildings in the squares is not acceptable</p>	<p>Uplighting has been removed from the proposals – see updated lighting plans refs:</p> <ul style="list-style-type: none"> - 547-(001)-DR-EX-MP-B, - 547-(002)-DR-EX-MP-B, - 547-(005)-DR-EX-MP-B, - 547-(500)-CA-EX-MP-B. 	<p>Y – updated plans</p>
	<p>E. The Peregrine falcon is a real asset for the site and there is concern that carrying out phase 1 works adjacent to the potential nesting location will scare it away – this will need to be considered by a falcon expert.</p>	<p>Please see meeting notes from meeting held on 7 July 22 with LBRuT planning and ecology officers. The meeting notes were issued to LBRuT on 18 July 2022.</p>	

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		<p>Waterman IE have also provided the following response: We are in agreement that the peregrine falcon is an asset for the Site and local area. As detailed in the Ecology Chapter that supported the EIA, mitigation measures have been provided both during the post the Development.</p> <p>During the construction period a CEMP will detail the requirement for an Ecological Clerk of Works (ECoW) who is a recognized peregrine falcon expert to monitor the roost site at the Maltings until it can be confirmed that the peregrine is absent from the building. Works will then be undertaken at the Maltings to block access points previously utilised. Monitoring will continue prior to the refurbishment works commencing at the Maltings to ensure the bird does not return to the roost site. In</p>	

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		<p>addition, and as a precautionary approach, and to avoid any potential disturbance events (given only a single peregrine falcon was recorded on site) the refurbishment works at the Site would be timed to commence outside of the main peregrine falcon breeding season (assessed to be between February / March when courtship intensifies to June when the young normally fledge).</p> <p>As part of the completed development a peregrine falcon nest box will be incorporated into the roof of the Maltings after the refurbishment works have been completed. This would be subject to a suitably worded planning condition. It is envisaged that this work would be overseen by an Ecological Clerk of Works (ECoW) who is a recognized peregrine falcon expert.</p>	

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		A 'Landscape and Environment Management Plan' (LEMP), will also be provided as part of the completed development to ensure the peregrine nesting box has the best possible chance of uptake. The LEMP will ensure no direct lighting of the box and that measure are put in place for monitoring.	
	F. What is the sqm of the biodiversity planting/area and where is it? it should not be the same planting areas as the play areas	Blending biodiverse areas with other open space areas (including playspace zones) is a common and appropriate approach. This is consistent with the play strategy, where play and nature are merged into one creating an immersive play experience for children. Please consult the UGF for sqm of each of the landscape typologies.	
	G. Plant species acceptable, except the crocosmia – this is a non-native species	The planting palette is indicative and it will be further developed at later stages - comment noted.	
Waste			
35	A. Commercial waste: Para 4.3.7 states: The actual provision for non-residential waste will be dictated by the incoming tenants/occupiers and their	The non-residential waste will be stored in the back of house	

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	waste contractors. It must be ensured that sufficient space for commercial waste storage is provided as it can be difficult to add at a later date. Where is the space for the commercial waste on the plans?	areas in each individual unit and stored separately from the residential waste stores in Development Area 1. The size of each bin store will be determined by the use of each unit.	
36	<p>B. Domestic waste</p> <p>i. Require a S106:</p> <ul style="list-style-type: none"> • for contributions towards a second delivery or for this to be private collection • towable recycling bins • facilities management ensure constant access to bins – where double stacked 	Noted	
	ii. There is potentially an error in the totals on table 4-2 which when added come to 565 properties rather than 558.	ii – Noted error on total figure for 1 bed and 2 bed. Table is updated in the revised OWMP – Rev E.	Y – Waste Management Plan-Rev E
	iii. Table 4-4 – the 3 and 4 bed houses must also be provided with suitable space to store 2 x 55L recycling boxes and 1 x 23L food waste box each	Noted, all townhouses have gardens where refuse can be stored in a compliant way.	

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	iv. Para 5.2.3 – states that space for a 23L food waste container be provided in each flat. It is unpractical to collect 585 individual caddies therefore space should be provided in each bin store for communal 240L bins on the basis of 23L per property.	240l food bin added.	Y – Waste Management Plan-Rev E
	v. how will food waste wheelie bins are transported from basement level to ground floor collection points, it is unlikely that these bins could be towed.	No longer transported. All bins at ground floor (GF) Level	Y – Waste Management Plan-Rev E
	vi. Its noted from Appendix B that 1100L bins (refuse, paper/card and mixed containers) are to be towed from bin lifts to the collection points. The council cannot provide towable recycling bins free of charge and they must be supplied and maintained at the cost of the development in perpetuity. Collection crews may refuse to empty any bins that are not maintained to a safe working level.	No longer transported. All bins at GF Level.	Y – Waste Management Plan-Rev E
	vii. It should be noted that towing bins puts excess wear on the moving parts. Special reinforced bins suitable for towing should be provided.	No longer transported. All bins at GF Level.	Y – Waste Management Plan-Rev E
	viii. Tow routes should be smooth and free of cobbles etc. Even speed bumps can cause significant damage to the wheels and castors on towable bins.	No longer transported. All bins at GF Level.	Y – Waste Management Plan-Rev E

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	ix. Where are the ground floor collection points for those blocks where waste is stored at basement level? These should be shown on plan illustrating that they are adequately sized to temporarily hold ALL bins awaiting collection.	No longer transported. All bins at GF Level.	Y – Waste Management Plan-Rev E
	x. 6.1.11 states that the collection point for building 4 is located 27m from the nearest point the refuse collection vehicle can wait – this has not been agreed with the waste service	Design revised, now 20m max for all bins stores.	Y – Waste Management Plan-Rev E
	xi. In a couple of instances bins are double stacked in the bin store making some of them inaccessible. It is stated that facilities management will ensure constant access to bins, this arrangement should be made legally binding in perpetuity.	No longer double stacked.	Y – Waste Management Plan-Rev E
	xii. For basement bin stores where bins are transferred to ground floor collection areas it is essential that 3 x additional 1100L bins are provided for each store to remain in the bin store on collection day for use whilst the rest of the bins are in the collection point. These could be stored elsewhere on site during the week and transferred to the relevant stores on collection day.	No longer transported. All bins at GF Level	Y – Waste Management Plan-Rev E
	xiii. Any push route between bin store / collection point to the waiting collection vehicle should be hardstanding/smooth and free of steps or steep slopes. Dropped kerbs are essential where relevant along the route.	Noted. Dropped kerbs will be located along all routes.	
	xiv. It is noted that bin stores for blocks 2 & 3, 7 & 8 and 11 & 12 are shared. Residents should not have to carry waste in excess of 30m (horizontal travel, excluding lifts/stairs). It's not clear if any of the flats in blocks that don't have their own bin store would exceed this?	Noted, bin stores are within 30m distance now at GF level.	Y – Waste Management Plan-Rev E

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	xv. Officers cannot locate the space in each store set aside for the temporary storage of bulky waste, despite it being referenced in 6.1.2	Bulky waste stores provided in majority of bin stores.	Y – Waste Management Plan-Rev E
	xvi. In a number of locations the bin storage does not meet minimum requirements. The table below sets out the minimum SPD requirements for once weekly (preferred) and twice weekly, also showing how many bin spaces are shown on plan and where any shortfall/surplus occurs. For clarity, as its not possible to provide 'part bins' it has been rounded up to ensure that minimum requirements are met.	Noted, bin stores have been updated.	Y – Waste Management Plan-Rev E
37	C. Development area 2 a. Further details to be secured via condition / reserved matters. b. There is a contraction in paras 6.2.1 which states the proposal is for twice weekly collections and para 6.2.10 which states weekly. The council will only accept weekly waste collections.	Development Area 2 is once per week collection.	
	Trees		
38	To fully consider this application, there are areas that require clarification, amendment or additional information before final comments can be made.	Please see document prepared by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
39	Further detail required: a) CAVAT: The LPA will require a tree-by-tree "Full" CAVAT valuation (Including the calculation methodology for each tree), to be included for each tree in the tree survey and undertaken by an Arboriculturist experienced in using the method. This is to ensure that any loss of amenity from tree removals is, as a	See paragraphs 2.2-2.8 of the document prepared by Waterman IE, dated 27 July 2022, titled 'Briefing Note –	

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	<p>minimum, commensurate with the value of the new tree planting proposals. Individual CAVAT valuation will be an integral part of ensuring that all retained trees, both within and adjacent to the site, will receive appropriate protection during the preparation, demolition, construction and conclusion phases of a long and complex project.</p> <p>o This is to include the 3x Local Authority Street trees flagged for removal (T107, T152 & T333), whose CAVAT valuation will be used to secure remuneration for off-site replacement tree planting in the public realm via a section 106 payment.</p>	<p>Response to Consultee Comments on 'Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).</p>	
40	<p>b) Mortlake Green Access - Page 14 of the "Landscape Design and Access Statement, Rev 01 dated March 2022" states that "No trees in Mortlake Green are proposed to be affected" and that "Pavements within Tree Protection Zones of existing trees in the park will be designed and detailed to avoid deep excavation and limit impact on existing root systems". From viewing the red line boundary there are several LA owned trees, including 2x street trees (T317 & T316), whose roots could be impacted by this proposed access. Council will expect the impacts of any proposed hard surfacing to be assessed in relation to the below and above ground constraints on existing trees, including those in the park and a no-dig solution used. All trees potentially impacted by these works will require a CAVAT valuation – include in survey.</p>	<p>See paragraphs 2.9-2.14 of the document prepared by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on 'Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).</p>	
41	<p>c) Tree Root protection Areas (RPA). – update and provide existing site conditions.</p> <p>When illustrating the RPA of any tree, both on and adjacent to the site, BS5837 (Trees in relation to design, demolition and construction - Recommendations: 2012) Section 4.6.2. specifies the following;</p> <ul style="list-style-type: none"> • "Where pre-existing site conditions or other factors indicate that rooting has occurred asymmetrically, a polygon of equivalent area should be produced. Modifications to the shape of the RPA should reflect a soundly based Arboricultural assessment of likely root distribution." 	<p>See paragraphs 2.15-2.18 of the document prepared by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on 'Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).</p>	

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	<ul style="list-style-type: none"> • These modifications are to account for and include but not be limited to "The morphology and disposition of the roots, when influenced by past or existing site conditions (e.g. the presence of roads, structures and underground apparatus)" • RPA's in submitted Tree Constraint Plans (TCP) and Tree Protection Plans (TPP) must be calculated and modified to account for asymmetric root development in the proximity of existing structures and hard surfacing as part of the full application. 		
42	d) Shading - The impact of shading needs to be assessed and incorporated as part of the submitted Arboricultural documentation. There is also an increased risk that such shading will lead to an increase in post-development pressure on affected trees for their eventual removal. It must be stipulated that any such future requests for tree removal for these reasons will be resisted as per the Councils Local plan and tree policy.	See paragraphs 2.19-2.24 of the document prepared by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
43	e) Lighting Provision - "Proposed Site Wide Landscape GA Plan Ref: P10736-00-004-GIL-0101, dated 11/03/2022" that there are numerous, potential conflicts between lighting positioning in relation to newly planted trees, with some lighting columns being positioned either adjacent to or within the plotted canopies of proposed trees. The positioning and design of lighting in relation to proposed and existing trees needs to be carefully considered regarding potential obstructions, with particular attention given to the requirement for increased management and maintenance of these trees as they grow. Potential obstructions need to be highlighted and alternative lighting positions submitted and agreed by the LPA in cases where such conflicts are identified. – construction within root zones / services / canopy / illumination.	See paragraph 2.25 of the document prepared by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
44	f) Hard Surfacing and Footpaths - areas of hard surfacing areas within the RPA of retained trees must use a permanent no-dig solution (ie.cellweb), not just	See paragraphs 2.26-2.27 of the document prepared by	

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	as protection measures during the demolition and construction phase, but also potential temporary access route to Mortlake green. Further details of design, detail, cross sections are required.	Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
45	<p>Necessary amendments:</p> <p>g) Tree protection - Section 8.13 of the report states "Tree protection should generally accord with the recommendations contained within BS5837:2012".</p> <p>o Replace the words "Generally" and "Should" with "Will", unless otherwise previously agreed in writing with the local planning authority.</p>	<p>This point is accepted, and the report has been updated accordingly.</p> <p>See updated Arboricultural Impact Assessment, prepared by Waterman IE, dated 27 July 2022.</p>	Y – updated report.
46	<p>Recommended Conditions:</p> <p>h) Tree planting - further information / detail</p> <p>i) Foundation design - details of foundation design and methodology for installation and construction that does not deleteriously impact nearby trees.</p> <p>j) Underground services - Impact on the roots of retained trees properly assessed. Where a conflict is identified, a methodology of installation that avoids damage to tree roots must be submitted to the LPA for approval.</p> <p>k) Tree protection</p>	See paragraphs 2.30-2.31 of the document prepared by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
	<p>Recommended informatives:</p> <p>l) Foundation Design and a firm commitment made to the use of "Minimally invasive foundations" within RPA's of retained trees, where there is an incursion.</p>	See paragraphs 2.30-2.31 of the document prepared by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on	

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		Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
47	8. Parks Department A. Playspace - Require a sitewide landscape plan with the play space boundaries marked on and labelled with the area measurement in square metres	See plan ref: P10736-00-004-GIL-0800, prepared by Gillespies.	Y – plan provided
48	B. Towpath - Recommend conditions / heads of terms	Clarification required as to suggested wording	
49	C. Mortlake Green - The pedestrian circulation drawing from 22/0900/FUL and school travel plan in 22/0902/OUT shows two routes being used through Mortlake Green, including as an off-road cycle route; this supports the LPAs argument that two routes will need to be widened / re-landscaped through the park. The Parks team will look into this and provide an updated quote to discuss as part of the potential s106 arrangements.	This is correct - See drawing ref: P10736-00-004-GIL-0125 of the Landscape drawing pack, prepared by Gillespies.	
50	D. Discussions on the other aspects of the S106 to follow	Noted – please issue when ready.	
9. Environmental Health – water c			
51	Policy framework o Local Plan: At least Emissions Neutral o London Plan: o Should not lead to further deterioration of existing poor air quality o Should not create unacceptable risk of high levels of exposure to poor air quality o Developments must be at least Air Quality Neutral o Masterplans, subject to an EIA, should consider how air quality can be improved as part of an air quality positive approach.	Noted	

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	<p>A. Air quality neutral.</p> <p>i. consultant’s assessment illustrates it is not air quality neutral for transport emissions and therefore substantial mitigation required or refusal.</p>	<p>Please see para 1.2 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: ‘Air Quality Responses’, dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
	<p>ii. An analysis of the air quality neutral calculations for the proposed development reported in the ES Chapter Air Quality Neutral have indicated an inappropriate methodology and assumption has been applied to the Flexible uses category. The applicant has not calculated the benchmarks correctly. Tables 1, 2 and 3 below indicate the nature of each land use under evaluation in this application in terms of air quality neutral status.</p>	<p>Please see paras 1.6-1.8 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of</p>	

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		Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).	
	<p>iii. In calculating the transport benchmarks for this group, as no emissions benchmark for classes A2, A3, A4, D1 and D2 are available, B1 use was applied as a proxy. However, when calculating the proposed development transport emissions, an average of the A1 and B1 uses was used. This is an erroneous approach given that two different entities are being compared (comparing Benchmark using B1 only with proposed development value using average of A1 and B1; this is comparing apples and pears).</p>	<p>Please see paras 1.6-1.8 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	
	<p>iv. Furthermore, the average of A1 and B1 is less conservative than B1. Once again, a conservative approach is required so that the appropriate level of mitigation is ascertained and suitable mitigation measures are agreed, deployed and monitored.</p>	<p>Please see paras 1.6-1.8 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT,</p>	

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		<p>prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	
52	<p>B. Damage cost and mitigation measures:</p> <p>i. Current LAQM measures not sufficient to reduce air pollution</p> <p>ii. Specific land use classes will require specific mitigation and therefore tailored mitigation is to be devised and deployed. Where this is not practical or desirable, pollutant off-setting will be applied.</p> <p>iii. The level of mitigation required associated with the operation phase of the proposed development was calculated using Defra's Damage Cost Approach¹ over the estimated lifetime of the proposed development. The approach applied in using total emissions in this instance takes into account the fact that the area is highly polluted and that no additional emissions are acceptable (given the need to safeguard human health in the area the current situation is unacceptable and needs improvement)</p> <p>iv. The level of total emissions associated with the operation of the proposed development (taking traffic emissions into account only) equates to a mitigation level required of £2,618,642. – To deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduces human exposure to nitrogen dioxide and particulate matter levels aiming at safeguarding human health.</p>	<p>Please see para 2.6 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>

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	v. To make the proposal air quality neutral (but still not air quality positive as sought by the London Plan) would be £415,604. Therefore, to make the proposed development acceptable, a Section 106 (S106) contribution is to be secured of a value to be agreed between £415,604 and £2,618,642.		
53	C. Demolition - Suitable mitigation (as set out later in the ES Air Quality Chapter) is required	<p>Please see paras 3.2-3.3 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
54	<p>D. Input data and assumptions:</p> <p>i. Vehicle emissions used: a conservative approach should be applied in the assumption. It is standard practice to assume at least a couple of years delay in the fleet composition as defined in the Emission Factor Toolkit database to account for a lower vehicle fleet turnover rate (for instance, to predict ambient air concentrations for 2029, 2026 or 2027 vehicle emissions should had been used instead for a more realistic – and conservative approach).</p>	<p>Please see paras 3.2-3.3 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT,</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>

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		<p>prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – Air Quality Responses, dated August 2022.</p>
	<p>ii. Background years used: the submission assumes pollution backgrounds are declining as per DEFRA's estimated declining rates overtime which are equally optimistic. Background levels should be conservative, and in line with earlier vehicle composition years of 2026 or 2027 (see above). To support the above, the baseline pollution levels reported in the ES Air Quality Chapter are lower in comparison to the both the LBRUT monitoring results for 2019 and LAEI modelled results for the same year. Therefore, predictions made for the opening year pollution levels are also like to be underestimated</p>	<p>Please see paras 3.5-3.8 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>

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	<p>iii. The monitoring results in Table 10.12 indicate that 9 of the 10 diffusion tube monitoring locations closest to the Site were at or exceeded the annual mean NO₂ objective of 40µg/m³ between 2015 and 2019. However, eight of the nine diffusion tubes, where data is available, recorded a reduction in the monitored annual mean NO₂ concentration from 2018 to 2019. The annual mean NO₂ concentration at the other diffusion tube on Mortlake Road remained the same.</p> <ul style="list-style-type: none"> • This is in line with most of London but is not true here. • The most relevantly located diffusion tube – site 74 - near Chalker’s Corner increased from 50ug/m³ up to 52ug/m³ from 2018 to 2019, which is very unusual, bucking national and local trends; with distance correction for the residential façade, this measures 49.6ug/m³. This is high before moving the junction closer and highly significant for this development. • This LBRUT monitoring data is backed up by LAEI modelling data – see attached consultant’s report and maps. 	<p>Please see para 3.11 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: ‘Air Quality Responses’, dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
55	<p>E. Model verification and adjustment - It is noted that during consultation, the EHO at LBRuT requested that urban background concentrations from the Wetlands Centre, Barnes were used in the air quality assessment. However, background concentrations from Defra’s predictions have been used instead. This is not supported; local measurements should had been used to ensure a robust assessment. Given that verification and adjustment is compared with and applied on modelled road NO_x concentrations, the higher the background values used in the baseline year, the lower the traffic contributions derived and the lower the adjustment factor required, which, again, does not provide a conservative approach.</p>	<p>Please see para 4.2 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>

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		(Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).	
56	<p>F. Emissions from additional transport:</p> <p>i. additional transport emissions on roads and junctions, in particular at Chalkers Corner, already overcapacity, resulting in queueing, idling traffic for many hours of the day, not just at peak. This is particularly relevant with a failed TEB.</p>	<p>Please see paras 5.3-5.4 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
57	<p>ii. In the Stantec report, speed appears over optimistic which is likely to further under represent emissions. This needs reviewing.</p>	<p>Please see para 5.6 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>

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		Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).	Y – Air Quality Responses, dated August 2022.
58	G. Questionable Monitoring data: i. The 6 monthly monitoring data (deploying two NO2 diffusion tubes at 10 monitoring sites), contained in a separate Waterman's document "Air Quality Monitoring Report" and on which significant reliance is placed, is questionable.	Please see para 6.2 of note, prepared by Waterman IE, dated June 2022 (Appendix F). Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022. Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).	Y – note issued to LBRuT on 29 June 2022. Y- Annex 2 of the ES Statement of Conformity. Y – Air Quality Responses, dated August 2022.

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	a) no information on the location of the monitoring sites used is provided	<p>Please see para 6.4 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
	b) no tabulation of the eastings and northings nor mapping of locations were provided - Figure A1 is missing). Accurate location details (eastings/northings) are crucial to calculate exposure at the façade;	<p>Please see para 6.6 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>

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		(Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).	
	c) more recent, and complete monitoring information is available to ascertain the baseline conditions to the application site, as published by LBRUT in their ASR 2020, reporting data for 2019. It is noted that diffusion tubes ID 74 and ID 70 are located along the same road as the application site and report significantly higher values than the reported in the ES Chapter on air quality monitoring – this is also highlighted	<p>Please see para 6.8 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
	ii. It is 6 months' data - not annual bias adjusted,	<p>Please see para 6.10 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>

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		Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).	Y – Air Quality Responses, dated August 2022.
	a) It focuses mainly on Chertsey Court,	<p>Please see paras 6.12-6.13 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
	b) It lacks accurate location details, and	Please see para 6.15 of note, prepared by Waterman IE, dated June 2022 (Appendix F).	Y – note issued to LBRuT on 29 June 2022.

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		<p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
	<p>c) It is pre closure of Hammersmith bridge - not representative of the current and foreseeable future situation of increased/diverted traffic flow adding to roads already over capacity</p>	<p>Please see para 6.17 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>

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		Quality Responses', dated August 2022 (Appendix H).	
	iii. This means it is less robust than the Council's ratified and bias adjusted annual data for 2019	<p>Please see para 6.19 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
	iv. The report refers to 60ug/m3, the hourly target for residential facades - this is incorrect. For facades of residential property, schools, hospitals and care homes, it should be the annual mean of 40ug/m3 – see LLAQM (TG16) (10).	<p>Please see para 6.21 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>

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		Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).	Y – Air Quality Responses, dated August 2022.
	v. Additional lane for a left hand turn on the opposite side of the road, on Lower Richmond Rd, reducing/removing the mini car park and cutting down 2 x mature trees, thereby moving the houses from 137 – 171 closer to the source and removing a useful, mature green buffer against pollution at this very busy junction. These residents are likely to be exposed to increased levels of pollution and the date of compliance is likely to be delayed, which is against London Plan 2021 SI1. "Development proposals should not: lead to further deterioration of existing poor air quality.... or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits"	<p>Please see paras 6.23-6.25 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>

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59	<p>H. Air quality positive observations</p> <p>i. significant additional work is required to agree suitable air quality positive measures - To date, no concrete suitable air quality positive measures have been specifically selected and proposed and negotiations with the LA need to take place to agree and secure a suitable list air quality positive measures with an indication of how much emission reductions are expected to be achieved. It is noted that the air quality measures need to be above and beyond the measures that will be required to make the proposal air quality neutral.</p> <p>ii. the air quality positive statement does not meet the required LA objectives - too vague and generic - The Air Quality Positive Statement should be SMART (Specific, Measurable, Achievable, Realistic, and Timely).</p> <p>iii. LBRUT does not have sufficient information to ascertain either what exact measures are being proposed and where, when, and for how long nor the benefits expected associated with each of them.</p> <p>iv. A way to monitor their efficiency and adjust as and when necessary is also expected.</p>	<p>Please see paras 7.5-7.8 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
	<p>v. A roadmap for air quality impacts, mitigation measures and air quality neutral and positive aspects should be reported distinctly for</p> <ul style="list-style-type: none"> • the detailed and the • outline stages of the application. This will enable LBRUT to better ascertain where and when mitigation is required as well as the suitable level of effort to be deployed. 	<p>Please see para 7.10 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses,</p>

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		Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).	dated August 2022.
60	<p>I. Size/massing:</p> <p>i. Current mitigation does not satisfy requirements of London Plan and LBRUT SPD. It needs to go further, either by reducing inputs - capacity/dwellings or reducing outputs – more/better incentives for modal shift/public transport or reduced road emissions.</p> <p>ii. The river should be reconsidered – LBRUT has been in touch with the PLA. If neither are possible damage costs have been calculated.</p>	<p>Please see para 8.2 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p> <p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES</p>

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		<p>prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
61	<p>J. Conditions / HOTs (if objections can be overcome):</p> <p>a. Car club bays: Must comply with LBRUT's Air Quality SPD s92, and include financial incentives/membership for 2 years.</p>	<p>Please see para 9.2 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>

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	b. Robust travel and service plans, with measurable, reportable targets, will need careful conditioning.	<p>Please see para 9.4 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
	c. Section 106 will be required – see report and maps attached.	<p>Please see para 9.6 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>

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	<p>d. Conditions:</p> <ul style="list-style-type: none"> • Low Emission Strategy • Reducing emissions from demolition and construction 	<p>(Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p> <p>Please see para 9.8 of note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided an Air Quality Assessment update in the ES Statement of Conformity at Annex 2 (Appendix G) and a further response document, titled: 'Air Quality Responses', dated August 2022 (Appendix H).</p>	<p></p> <p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p> <p>Y – Air Quality Responses, dated August 2022.</p>
10. Environmental Health – Noise and Odour			
62	<p>Recommend conditions:</p> <ul style="list-style-type: none"> • Rodent activity from dislodged vermin during the commencement of demolition and construction activities. 	Agreed	
63	<ul style="list-style-type: none"> • Noise impact from demolition and construction activity upon residents in the vicinity of the development 	Please see para 1.4 of 'Briefing Note –Response to Consultee Comments on Noise', prepared	

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		by Waterman IE, dated 29 July 2022 (Appendix I).	
64	<ul style="list-style-type: none"> Noise impact from external transportation noise sources such as rail, aircraft and road traffic on the proposed residential development (noise protection residential / Noise Protection from internal transmission) 	Please see paras 1.5-1.6 of 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 29 July 2022 (Appendix I).	
65	<ul style="list-style-type: none"> Noise from mechanical services plant including heating, ventilation and air conditioning (HVAC) and kitchen extraction serving the proposed development affecting existing residential properties in the vicinity of the proposed development 	Please see para 1.7 of 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 29 July 2022 (Appendix I).	
66	<ul style="list-style-type: none"> Impact from odour from use of kitchen extraction equipment 	Acceptable, subject to suitable condition wording.	
67	<ul style="list-style-type: none"> Dust emissions from demolition and construction activities impacting upon residential properties in the vicinity 	Agreed, subject to suitable condition wording.	
68	<ul style="list-style-type: none"> Potential noise breakout from inadvertently leaving emergency doors open namely for the proposed cinema 	Please see para 1.8 of 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 29 July 2022 (Appendix I).	
11. Environmental Health – Contaminated Land			
69	Recommend conditions	Suggested wording to be provided for review.	N
12. Highways			
70	A full assessment of the planning applications is not possible due to concerns and errors within the Transport Assessment as described below. These should	Details provided below of Stantec response.	

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	be addressed by the applicant and/or peer reviewed to enable further assessment.		
71	<p>Previously,</p> <ul style="list-style-type: none"> o Council expressed concern regarding the absence of commitment to transport mitigation. o Council challenged a change in the trip generation methodology which resulted in relatively small increases in the total number of trips predicted to be generated despite the scale of the increase in the quantum of development. o number of trips in the morning peak period would increase from 2,391 to 2,410, o number of trips in the afternoon peak period would increase from 1,862 to 1,938. 	<p>There is significant investment from the applicant to mitigate the impact of the development on the surrounding highway network. In total the investment on Transport improvements, through s278 works and contributions to TfL / LBRuT is over £16.5 million.</p> <p>The trip generation methodology change is directly related to the school trip generation. Further details are provided in the response to Comment A below.</p>	
72	<p>There are serious concerns about the robustness of this data.</p> <ul style="list-style-type: none"> o the way that the predicted school trips have changed between 2020 and 2022 despite there being no material change to the proposed school. The submission puts this down to: o greater emphasis on sustainable travel o adjustment to the trip generation methodology in the light of data from other schools 	Further details are provided in the response to Comment A below.	
73	<p>However,</p> <ul style="list-style-type: none"> o this does not explain the reduction in total trips with fewer students also predicted to travel to school on foot, by bike and using public transport. 	Further details are provided in the response to Comment A below.	

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	<ul style="list-style-type: none"> o For a school of 1,200 students and 60 staff (and assuming also ancillary trips and some parents driving their children to school), officers are not persuaded that there would be only 985 total arrivals in the hour prior to the school starting, with net arrivals being 723. o This is supported by data collected for other schools to get estimates of how many pupils arrive/depart within an hour of the school start and end times in the light of the Stag application appearing to showing only about 800 of 1,200+ students and staff arriving. o 100% pupils arrived within the hour before school starts -most only allowed pupils on site up to 45 minutes before. o 80-100% left within the hour after school finished because most clubs were only an hour. It was only Sports fixtures or perhaps Yr 13 study groups that perhaps stay later. The suggested 80% is likely to be closer to 90%. 		
74	<p>A. Evidence is required to justify the reduction in total school trips. What appears to be only a relatively modest increase in trips between the 2020 and 2022 schemes depends on this large reduction in school trips offsetting the increase in trips from the larger whole development.</p>	<p>Stantec: "Evidence is provided within the TA to justify the change in trips generated by the school. The results are based on published trip rates using the same methodology as previously agreed with the LBRuT Resolved Position (2020). The only difference is one of the sites (Southgate) that was used in the assessment has been omitted.</p> <p>Notably Southgate school, which was used in the assessment previously has a significantly higher peak hour</p>	

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		<p>person trip rate and is not comparable with the other schools. This school was taken from TRAVL data and there is limited information for how the trip rate was derived. Closer analysis of the data shows that with 1,600 students and 141 teachers, with 0.474 leaving the site nearly 800 students would have their parents dropping them to school which is not reflective of a secondary school and how the school at Mortlake would operate.</p> <p>Notably all of the agreed TRICS sites are showing an arrival trip rate between 0.77 and 0.821, where we have used 0.819 in the AM peak hour. Therefore, the numbers are in line with other schools where detailed surveys have been undertaken.</p> <p>The data provided in the consultation response suggesting 100% of pupils arrive in peak hour, it is</p>	

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		<p>unclear where this data has come from and whether it is based on full multi-modal surveys or is just an opinion.</p> <p>Notably it was agreed with TfL that Southgate School should be discounted and the average of the other 5 schools has been used for the assessment. In addition, this was discussed with LBRuT during pre-app discussions and it was agreed in principle that Southgate was not reflective and comparable with the other schools.”</p>	
75	B. Why the trip generation for the cinema is different from 2020?	Cinema has reduced in size from 2,120 m2 to 1,606m2.	
76	C. The TA in numerous places notes the PTAL of the site and often caveats this with the location is more accessible than the PTAL implies. The PTAL is the PTAL. In numerous places, the TA says that there are 4 trains per hour from Mortlake to London Waterloo (via Putney) all day. This is not the case. Since the pandemic, there are only 2 trains per hour off-peak. Moreover, South Western Railway has proposed that this reduction to 2 trains per hour is made permanent in December 2022. Predictions of rail usage and statements about the PTAL need to be reassessed.	Stantec: “Noted, the TA has assumed that train services would return to 4 per hr once the demand rises on the trains. Patronage data used in the assessment is based on pre-Covid conditions when trains were significantly busier, which was considered a robust way to study the impact as it would demonstrate a worst-case assessment.	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
		<p>However, to be robust a new assessment has been undertaken with two trains per hour and updated patronage data provided by Network Rail. Full details are included on TN045 - Rail Impact Assessment for Mortlake Station (Appendix K).</p> <p>The updated rail assessment indicates that there is sufficient capacity for forecasted future passenger numbers in terms of station infrastructure and train capacity in 2022. Patronage data shows 77% decrease in train users at Mortlake station the reduction of train services to two per hour shows that the trains are still operating with more spare capacity than pre-covid.</p> <p>PTAL would be improved with the permeability of the site. In addition, it was agreed with TfL as part of the original application that the rating in</p>	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
		<p>the northwest corner is incorrect as it ignores the bus services that operate along Clifford Avenue. A bespoke PTAL assessment has been undertaken for the site and full details are included on TN047 - Stag Brewery PTAL Technical Note - Rev A (Appendix L).</p> <p>The assessment concludes that the PTAL score across the Site is in reality higher than the existing rating. The existing PTAL ratings show the site is predominantly 1a and 2 whereas the results of the updated assessment using PTAL published guidance shows the Site is largely PTAL 2 with some pockets of 3."</p>	
77	<p>D. Questions are raised over the robustness of using data dating back to 2016 and 2017, given its age, impact of COVID and closure of Hammersmith Bridge. The TA states that TfL are satisfied with the traffic assessment. Confirmation is sought from TfL.</p>	<p>Stantec: "New traffic surveys have been undertaken at the junctions of Chalker's Corner, Great Chertsey Road / Dan Mason Drive / Hartington Road, Upper Richmond Road / Clifford Avenue and Lower Richmond Road / Mortlake High Street to compare with</p>	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
		<p>the 2016 / 2017 data used in the assessment. Full details are included in TN048 – Traffic Data Comparison (Appendix M).</p> <p>The results have concluded that there is a general decrease in peak hour traffic (0800-0900 and 1700 – 1800) from 2016/17 to 2022, which is the assessment times based on when the development generates the highest trips on the surrounding network. This is due to more people now working from home and travelling outside of peak hours.</p> <p>It is therefore considered that the previous modelling work should still be considered satisfactory and robust and the mitigation at Chalkers Corner is sufficient to mitigate the impact of the development, as it was based on higher baseline traffic data. No further junction modelling is therefore proposed at this time. In</p>	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
		addition, it is noted, that prior to implementation of the Chalkers Corner scheme as part of the Traffic Management Act 2004 Notification (TMAN), 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."	
78	E. If concerns over the robustness of the TA are satisfied, the Chalker's Corner light scheme is predicted to mitigate much of the traffic impact. The s106 would need to ensure the timely delivery of the Chalker's Corner scheme. TfL will need to commit to such delivery.	Noted	
79	F. Remain concerned over the ability of ensuring the proposal model split is achieved.	Modal shift targets are to be monitored through the Travel Plans. These will have targets that the applicant will have to meet, otherwise increased measures will need to be introduced	
13. Lead Local Flood Authority			
80	Current recommendation – refusal - The drainage hierarchy section requires more information and the runoff rate section fails.	See responses below, provided by Waterman IE.	
81	A. Drainage hierarchy: i. MORE INFORMATION REQUIRED – the green roof and water butts should be shown on the drainage drawing.	See paragraphs 2.2-2.4 of the Drainage and Flooding response note, prepared by Waterman IE, dated August 2022 (Appendix N).	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
	<p>B. Runoff rate: ii. FAIL – The proposed runoff rate of 249l/s is much higher than the greenfield runoff rate of 44.1l/s. Consideration should be made to additional attenuation features such as blue roofs to reduce the proposed runoff rate. The site area used to calculate the 100 year greenfield runoff rate of 44.1l/s should be confirmed. iii. MORE INFORMATION REQUIRED – the existing (brownfield) runoff rate needs to be supplied for 1 in 1 year event and a 1 in 30 year event. All runoff rates should be presented in the SuDS proforma. iv. The applicant has submitted information which has not sufficiently addressed policy relating to London Plan Policy SI 13. Until the above points are addressed, matters relating to volume control, Non-Statutory Technical Standards for SuDS S7-S9 and future maintenance have not been assessed due to their reliance on suitable proposals for sustainable drainage features and runoff rate restrictions.</p>	<p>See paragraphs 2.6, 2.8, & 2.10-2.15 of the Drainage and Flooding response note, prepared by Waterman IE, dated August 2022 (Appendix N).</p>	
CIL Summary (Albeit with caveats with this estimate)			
82	<p>A. Provide a clearer phasing plan that could be used as an approved plan</p> <ul style="list-style-type: none"> o The estimates have not been split into individual phases because the phasing plan in the CMS relates to both the outline and detailed elements so it was difficult to work out what each phase actually entails - for CIL, have to treat the outline and detailed elements separately. o The area 2 basement doesn't seem to appear in the phasing plan at all, and the area 1 basement, in addition to being split in 3 parts in the phasing plan, making it difficult to calculate each phase, part of the basement seems to be commencing within 3 different phases, so wasn't sure which phase it was actually commencing in. o Demolition is also not specified in any phase. 	<p>As financial viability appraisal is reaching a finalised state, the applicant will know the number of units to be provided and where in the masterplan they will be located. This will enable the applicant to confirm a delivery / phasing plan. This will be discussed with LBRuT officers as part of the s106 discussions.</p>	
83	<p>B. Actual amount of CIL can only be confirmed once all relevant details are approved and any relief claimed.</p>	Noted	
84	<p>C. Lawful use:</p> <ul style="list-style-type: none"> i. not given any demolitions credit, as none of the buildings have been in lawful use for at least 6 months in the previous 3 years. 	Noted	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)																		
	ii. Clause in S106 to revisit viability assessment in the event that a lawful use is established, as this would materially affect the amount of CIL payable and the delivery of affordable housing.																				
85	<p>D. Estimates</p> <p>Detailed Element</p> <table border="1" data-bbox="384 521 1031 630"> <thead> <tr> <th>Community Infrastructure Levy (CIL) estimate</th> <th>Without Social Housing Relief</th> <th>With Social Housing relief</th> </tr> </thead> <tbody> <tr> <td>Mayoral CIL</td> <td>£7,928,707.30</td> <td>£7,651,565.77</td> </tr> <tr> <td>Borough CIL</td> <td>£28,773,530.13</td> <td>£27,577,705.03</td> </tr> </tbody> </table> <p>Outline Element</p> <table border="1" data-bbox="384 678 1031 787"> <thead> <tr> <th>Community Infrastructure Levy (CIL) estimate</th> <th>Without Social Housing Relief</th> <th>With Social Housing relief</th> </tr> </thead> <tbody> <tr> <td>Mayoral CIL</td> <td>£4,568,802.91</td> <td>£2,738,657.94</td> </tr> <tr> <td>Borough CIL</td> <td>£19,713,715.48</td> <td>£11,816,907.95</td> </tr> </tbody> </table>	Community Infrastructure Levy (CIL) estimate	Without Social Housing Relief	With Social Housing relief	Mayoral CIL	£7,928,707.30	£7,651,565.77	Borough CIL	£28,773,530.13	£27,577,705.03	Community Infrastructure Levy (CIL) estimate	Without Social Housing Relief	With Social Housing relief	Mayoral CIL	£4,568,802.91	£2,738,657.94	Borough CIL	£19,713,715.48	£11,816,907.95	Noted. Final CIL estimates to be based on the final area schedule (Rev J, dated 13 July 2022) submitted with these substitutions. Updated CIL forms (Application A only) have also been prepared and submitted, dated 13 July 2022.	Y – updated CIL forms.
Community Infrastructure Levy (CIL) estimate	Without Social Housing Relief	With Social Housing relief																			
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External Consultee responses																					
86	<p>Consultees where no response has been received as yet:</p> <ul style="list-style-type: none"> • Greater London Authority • Transport for London (This will form part of GLA Stage 1) • London Borough of Wandsworth • London borough of Hammersmith and Fulham • South Western Trains • Network Rail. 	GLA, TfL and Network Rail responses now all received.																			
87	<p>No objections raised from the following consultees (subject to conditions):</p> <ul style="list-style-type: none"> • Historic England (Archeology) • Natural England • Achieving for Children 	Suggested condition wording to be proposed for applicant review.																			
88	<p>Consultees not wishing to comment</p> <ul style="list-style-type: none"> • Historic England (Planning) • Secretary of State / National Planning Casework Unit 																				
89	<p>1. London Borough of Hounslow –</p> <ul style="list-style-type: none"> • Request improvements to 195 bus route, which links the site to Chiswick 	Stantec response: TfL have requested a sum of £3.2																			

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
		million from the applicant towards improving bus services in the vicinity of the site. This will include increasing bus services and provide money towards improving routes. This is considered sufficient to mitigate the impacts of the increased bus passengers from the development.	
90	<p>2. Environment Agency</p> <p>A. Holding objection until further clarification is received. It is unclear whether the proposed flood defence wall will provide a continuous, fit for purpose flood defence line and how the proposal differs from the wall configuration agreed between the EA and the applicant under previous application reference 18/0547/FUL.</p> <p>B. Further information required to provide certainty that the proposed development will be safe for its lifetime from flooding in line with Paragraphs 159 and 164 of the NPPF, and Policy LP 21 of the Richmond Local Plan (2018)</p> <p>C. Thames Tidal Flood Defences - Contradictory information has been submitted with regards to the flood defence. For example, Appendix 12.5: Flood Defence Wall Summary Note [Doc Ref: WIE1871-104-BN-3-1-2-RiverWall] by Waterman Infrastructure & Environment Limited dated 22 February 2022 includes two drawings outlining different proposed locations for the final flood defence line. The drawing numbers are:</p> <ul style="list-style-type: none"> ▪ 1006 Rev A07 by Waterman Infrastructure & Environment Limited dated July 2017. ▪ 38262/5520/09 by Stantec dated 18 January 2022. <p>D. Overcoming EA Objection</p>	<p>Stantec drawings 38262/5520/09 and 38262/5520/23 have been updated to match the current line of the flood defense wall.</p> <p>The River Wall Note, (ES Appendix 12.5), has been updated.</p>	<p>Y – Stantec updated drawings</p> <p>Y - The River Wall Note, (ES Appendix 12.5), has been updated.</p>

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
	<p>i. provide further clarification as to which drawings of the flood defence line are to be incorporated into the final design.</p> <p>ii. Any drawings of flood defence line configurations not being incorporated into the final design should be withdrawn from the submitted information or amended to show the proposed configuration.</p> <p>iii. Confirmation that the configuration of the flood defence line will be as agreed previously should also be provided.</p> <p>iv. Provide all drawings of the Thames Tidal flood defence are included within Appendix 12.5.</p> <p>v. There has been significant correspondence between EA and the applicant since 2016 regarding the configuration of the flood defence wall in any new development at this site. We would welcome an opportunity to discuss the contents of this letter in greater detail.</p>		
91	<p>3. Thames Water</p> <p>a) Waste Comments: unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available.</p> <p>b) Water Comments: Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available.</p>	<p>The Foul Water and Utilities Assessment issued as part of the application provided correspondence from Thames Water confirming that there was sufficient capacity in the sewage systems to serve the development (p. 46).</p> <p>The Foul Water and Utilities Assessment issued as part of the application provided correspondence from Thames Water outlining a budget quotation for the various supplies required and that this would need to be followed up with further investigations to</p>	N

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
		allow Thames Water to assess the requirements for supplying the site (p. 28). This would follow as part of the next design stages and on the basis of the construction phasing etc. The investigations were not undertaken as part of the previous applications.	
92	<p>c) Supplementary Comments Regarding foul water:</p> <p>i. confirm the foul water manhole reference numbers which the development proposes to connect into.</p> <p>ii. confirm which areas of the development will drain to each of those connection points to the public foul sewer system. This is so Thames Water can calculate the impact of the additional foul flows on the local foul sewer system.</p> <p>iii. specify either the anticipated flow rate through each proposed foul water manhole, or the number and type of buildings (e.g. 300 dwellings, 500m2 of offices).</p> <p>iv. Regarding Surface Water, the site plans state that some surface water currently enters the foul sewer system and that this will be removed. Confirm what flow rate will be removed, and from which section of the foul sewer.</p> <p>v. demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.</p> <p>vi. Agree to the following, that would be secured via conditions:</p> <ul style="list-style-type: none"> • incorporate within proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. 	<p>i.-iv. See paragraph 4.13 of the Drainage and Flooding response note, prepared by Waterman IE, dated August 2022 (Appendix N).</p> <p>V. See paragraph 4.10-4.11 of the Drainage and Flooding response note, prepared by Waterman IE, dated August 2022 (Appendix N).</p> <p>vi. Noted, see paragraph 4.13 of the Drainage and Flooding response note, prepared by Waterman IE, dated August 2022 (Appendix N).</p>	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
	<ul style="list-style-type: none">• There are public sewers crossing or close to your development. Require condition regarding piling method statement		

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93	<p>4. Port of London</p> <p>B. Notice has not been served on the PLA – within the red line of their ownership</p> <p>C. Interaction with the River</p> <p>i. The location of the boathouse is disappointing. With a review of the proposed development there might have been the opportunity to enhance the river related offering as part of this development and relocate the boathouse to the western side of the site.</p> <ul style="list-style-type: none"> o At low tide there is no water and therefore it would not be possible to provide full tidal access for the rowing club to the river. o The drawdock is also susceptible to flooding at high waters, which could again cause access limitations o The applicant should explain the reasonings for the river related facilities remaining in building 9 and should provide all the necessary supporting documents if the boat house is to remain within building 9, including the swept paths that were previously undertaken <p>D. Towpath Works / S106</p> <p>ii. Discussions on license for works on towpath will need re-visiting and concluding</p> <p>iii. incorporate suicide prevention measures.</p> <p>iv. Refer to https://www.pla.co.uk/assets/asaferriversidev15.pdf</p> <p>E. Use of the River During Construction - PLA does agree to the carrying out of a River Transport Feasibility Study and it is recommended that this is secured through a condition.</p> <p>F. External Lighting – recommend condition</p> <p>G. River Works Licence</p>	<p>Part B. The PLA are not registered landowners for the site.</p> <p>Part C: please see email from the Fulham Reach Boat Club, dated 17 June 2022 (Appendix O).</p> <p>Part C: Squires have provided the following response: “Location was acceptable previously and provides a focus and community use for this end of the masterplan, drawing people along the new High Street, instead of bunching around the Maltings. The amendments to gain access to the Maltings would be extensive to the BTM and would not provide easy access for a boat club. Access at low tide is similar to other points along the site edge. We have included swept paths as previously on drawings.”</p>	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
		<p>Part D: to be discussed as part of the s106 agreement discussions.</p> <p>Part E: noted</p> <p>Part F: suggested wording to be provided.</p> <p>Part G: A consultation exercise with the MMO is ongoing, led by Waterman IE, separate to the planning process.</p>	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
94	<p>5. Marine Management Organisation</p> <p>A. Works below mean high water mark may require a Marine License</p> <p>B. A wildlife licence is required for activities that would affect a UK / European protected marine species.</p> <p>C. Environmental Impact Assessment - If this consultation elates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link</p> <p>D. Marine Planning - Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons.</p>	A consultation exercise with the MMO is ongoing, led by Waterman IE, separate to the planning process.	
95	<p>6. Metropolitan Police</p> <p>A. Conditions - Secured by Design and evidence of such accreditation.</p> <p>B. Request for discussions on:</p> <ul style="list-style-type: none"> • Permeability • CCTV • Lighting • Security for flats / communal entrances • Gates, storage and outbuildings 	<p>A – Noted</p> <p>B – all these items have been discussed previously with the Met during the refused GLA application, but we will continue discussions.</p>	
96	<p>7. Health and Safety Executive / Gateway One - Concerns / objections to:</p> <p>A. Means of escape and fire service access</p> <p>B. Single staircases to basement lift to basement</p> <p>C. Refuse area in basement</p> <p>D. Lack of detail on wheelchair user refuse and contradictions between planning statement and fire statement.</p> <p>E. Recommendations of conditions for outline section and need for re-consultation with the HSE</p> <p>F. Recommendation the applicant uses the fire statement form from gov.uk.</p> <p>G. Further advice as outlined in HSE response.</p>	See full HSE response, dated 27 July 2022, prepared by Hoare Lea.	Y

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
97	<p>8. Sport England A. No objection, subject to the requirements and conditions set out in application 22/0902/FUL being satisfied, including clauses within the Section 106</p> <ul style="list-style-type: none"> • ensure the school sports facilities will be delivered ahead of (or alongside) the development of housing on the site. • Phasing • if it is decided not to proceed with the secondary school that provides a community sports hall, alternative proposals may be required to meet the sporting needs for indoor sports facilities arising from the Stag Brewery site either within amended proposals on the site or a contribution to off-site provision. <p>B. Sport England would also like to draw the applicants' attention to its Active Design guidance. https://www.sportengland.org/facilities-planning/active-design/. Much of this detail will need to be addressed at the reserved matters stage]</p>	Noted	
98	<p>9. CCG</p> <p>The submitted Environmental Statement (March 2022) assesses the impact on primary care (GP) infrastructure. It identifies two GP practices within 1km of site - Richmond Medical Group and Johnson and Partners who are both located in Sheen Lane Health Centre. It states, at paragraph 7.62, that both surgeries are accepting new patients indicating there may be spare capacity. This is an incorrect assumption as closing a practice list to new registrations is a decision taken by CCG in exceptional circumstances often because of contractual issues.</p> <p>The two GP practices are part of Sheen and Barnes Partners Primary Care Network (PCN). This also includes two other practices – Essex House and Glebe Road Surgery and cover a population of 52,230 registered patients. The PCN is providing a wider range of services using an increasingly multi-</p>	<p>Hatch have provided the following comments:</p> <p>“We reiterate that according to the evidence reviewed for the purposes of the socio-economic assessment, the two GP’s in closest proximity to the Site have a ratio of registered patients per FTE GP which falls below the HUDU benchmark of 1,800. Further, the socio-economics assessment found</p>	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
	<p>disciplinary workforce. This has placed further pressure on workforce and estate capacity. PCN development work is currently underway in Richmond Borough and as such there may be further hub service requirements. The two GP Practices in Sheen Lane Health Centre do not have the capacity to absorb the additional demand generated by the proposed development. Consideration will need to be given to the configuration of the current building and digital solutions to manage access for an increased number of patients. This will require capital investment.</p> <p>The Environmental Statement concludes that the demand generated by up to 2,472 additional residents will have an adverse impact on primary healthcare (paragraph 7.124) and that a s106 contribution should be secured to mitigate the impact (paragraph 7.149 and Table 7.23).</p> <p>The Council's Planning Obligations Supplementary Planning Document (June 2020) supports the use of the HUDU Planning Contributions Model (HUDU Model) to assess the impact of development on healthcare infrastructure and calculate developer contributions (paragraph 6.78).</p> <p>Based on the indicative dwelling mix in Table 3.0 of the Community Uses and Cultural Strategy (March 2022), the HUDU Model calculates a s106 requirement of £583,260 which is required to mitigate the impact of the development.</p> <p>Whilst the Environmental Statement focuses on primary healthcare, a Community Uses and Cultural Strategy (March 2022) also considers 'intermediate' healthcare and acute (secondary) healthcare provided in hospitals. Table 2.8 lists Health Centres in the surrounding area, which accommodate community services provided by Hounslow and Richmond Community Healthcare NHS Trust and South West London and St George's Mental Health NHS Trust. Table 3.6 suggests that mitigation in the form of a s106 financial contribution may be required to off-set the potential pressures faced by providers in accommodating the additional demand generated by the development.</p>	<p>that the ratio of patients per FTE GP would remain below the HUDU benchmark when the total population yield from the proposed development is added to the current number of registered patients. This suggests there is capacity to absorb additional demand in local GP facilities which is contrary to LBRuT's comments."</p>	

Row No.	LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
	<p>The significant increase in demand will have an impact on Hounslow and Richmond Community Healthcare NHS Trust (HRCH) community health services, such as district nursing, health visiting, urgent treatment centre and physio plus a new school resulting in school nurses and immunisations teams seeing an expected increase in patients. Therefore, we have to assume that there will be a significant increase across both adult and children's services, which while difficult to determine exactly which services will be impacted it is inevitable that HRCH will see an increase in demand. A number of community health services are already provided from Centre House, Sheen Lane, including, but not limited to MSK Physiotherapy, District Nursing, Richmond Response & Reablement Team (RRRT), Children's Immunisation, Podiatry Service, Falls Clinic.</p> <p>HRCH provides rehabilitation inpatient (intermediate) beds at Teddington Memorial Hospital. The HUDU model does include intermediate care and the development is likely to have an impact on this service. The additional cost would be £37,725.</p> <p>Therefore, it is felt that the developer has a responsibility to contribute towards such an increase in healthcare costs, with the total being £620,985. Whilst the normal approach is to pay a contribution prior to occupation of the residential units, to ensure that investment in healthcare is delivered in a timely manner, the trigger point would be based on the commencement of development.</p>		

Application B (ref: 22/0902/FUL)

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
Policy – Flooding, playing field, OOLTI, education		
A. Community Use Agreement as those previously discussed.	Agreed	
Urban Design and conservation		
<p>A. Building:</p> <p>i. Need clarity on the green screen to the left of the main school entrance.</p> <p>ii. Need greater detail to assess important details such as window reveals.</p> <p>iii. Need greater detail on the appearance of the roof and roof screen</p>	All to be dealt with via a suitably worded planning condition	
B. MUGA and associated sports facilities: it is not entirely clear what these will look like. Further detail required to allow robust assessment	Can be dealt with via a suitably worded planning condition	
<p>C. Open space:</p> <p>i. Additional street tree planting in the surrounding area would be beneficial.</p>	Please can officers confirm which area this is referring to?	
ii. Green roofs / walls should be used to help mitigate the loss, together with additional tree and other planting.	<p>See indicative drawing ref: C645_Z3_E_AL_002 (Appendix J), which sets out where green walls could be located. Final details could be subject to a suitably worded planning condition.</p> <p>A ‘potential area to be provided as green roof’ is shown on the submitted roof plan (ref: 18125 C645_Z3_P_RF_001 Rev B).</p>	Y – see Appendix J.
<p>D. Boundary treatments</p> <p>i. The treatment of the MUGA and any school boundary treatment will have an impact on the sense</p>	Information on the MUGA enclosures is given on p23 of the School Landscape DAS.	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
of openness and character here. Need further detail / conditioned		
E. Conditions: v. Materials, window reveals, roof boundary treatment & plant, hard & soft landscape, boundary treatment.	Noted and agreed	
3. Highways		
A full assessment of the planning applications is not possible due to concerns and errors within the Transport Assessment as described below. These should be addressed by the applicant and/or peer reviewed to enable further assessment.	Details of Stantec response provided below.	
<p>Previously,</p> <ul style="list-style-type: none"> o Council expressed concern regarding the absence of commitment to transport mitigation. o Council challenged a change in the trip generation methodology which resulted in relatively small increases in the total number of trips predicted to be generated despite the scale of the increase in the quantum of development. o number of trips in the morning peak period would increase from 2,391 to 2,410, o number of trips in the afternoon peak period would increase from 1,862 to 1,938. 	<p>There is significant investment from the applicant to mitigate the impact of the development on the surrounding highway network. In total the investment on Transport improvements, through s278 works and contributions to TfL / LBRuT is over £16.5 million.</p> <p>The trip generation methodology change is directly related to the school trip generation. Further details are provided in the response to Comment A below.</p>	
<p>There are serious concerns about the robustness of this data.</p> <ul style="list-style-type: none"> o the way that the predicted school trips have changed between 2020 and 2022 despite there being no material change to the proposed school. The submission puts this down to: 	Further details are provided in the response to Comment A below.	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<ul style="list-style-type: none"> o greater emphasis on sustainable travel o adjustment to the trip generation methodology in the light of data from other schools <p>However,</p> <ul style="list-style-type: none"> o this does not explain the reduction in total trips with fewer students also predicted to travel to school on foot, by bike and using public transport. o For a school of 1,200 students and 60 staff (and assuming also ancillary trips and some parents driving their children to school), officers are not persuaded that there would be only 985 total arrivals in the hour prior to the school starting, with net arrivals being 723. o This is supported by data collected for other schools to get estimates of how many pupils arrive/depart within an hour of the school start and end times in the light of the Stag application appearing to showing only about 800 of 1,200+ students and staff arriving. o 100% pupils arrived within the hour before school starts -most only allowed pupils on site up to 45 minutes before. o 80-100% left within the hour after school finished because most clubs were only an hour. It was only Sports fixtures or perhaps Yr 13 study groups that perhaps stay later. The suggested 80% is likely to be closer to 90%. 		
<p>A. Evidence is required to justify the reduction in total school trips. What appears to be only a relatively modest increase in trips between the 2020 and 2022</p>	<p>Stantec: Evidence is provided within the TA to justify the change in trips generated by the school. The results are based on published trip rates using the same methodology as previously agreed with the</p>	

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<p>schemes depends on this large reduction in school trips offsetting the increase in trips from the larger whole development.</p>	<p>LBRuT Resolved Position (2020). The only difference is one of the sites (Southgate) that was used in the assessment has been omitted.</p> <p>Notably Southgate school, which was used in the assessment previously has a significantly higher peak hour person trip rate and is not comparable with the other schools. This school was originally surveyed in TRAVL in 2002 and there is limited information for how the trip rate was derived. Closer analysis of the data shows that with 1,600 students and 141 teachers, with an AM peak hour (08:00 - 09:00) departure rate of 0.474 leaving the school, this equates to nearly 800 parents leaving. Having 50% of secondary students being dropped off to school by their parents is not reflective of a secondary school and how the school at Mortlake would operate. This site has therefore been omitted.</p> <p>Notably all of the agreed TRICS sites (excluding TRAVL sites) are showing an arrival trip rate between 0.77 and 0.821. We have used the average calculated arrival trip rate of 0.819 (including TRICS and TRAVL school sites) in the AM peak hour, which is notably in line with other schools where detailed surveys have been undertaken.</p> <p>The data provided in the consultation response suggesting 100% of pupils arrive in peak hour, it is unclear where this data has come from and whether it is based on full multi-modal surveys or is just an opinion.</p> <p>Notably it was agreed with TfL that Southgate School should be discounted and the average of the remaining 5 schools has been used for the assessment. In addition, this was discussed with LBRuT during</p>	

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	pre-app discussions, and it was agreed in principle that Southgate was not reflective and comparable with the other schools.	
B. Why the trip generation for the cinema is different from 2020?	Cinema has reduced in size from 2,120 m2 to 1,606m2.	
C. The TA in numerous places notes the PTAL of the site and often caveats this with the location is more accessible than the PTAL implies. The PTAL is the PTAL. In numerous places, the TA says that there are 4 trains per hour from Mortlake to London Waterloo (via Putney) all day. This is not the case. Since the pandemic, there are only 2 trains per hour off-peak. Moreover, South Western Railway has proposed that this reduction to 2 trains per hour is made permanent in December 2022. Predictions of rail usage and statements about the PTAL need to be reassessed.	<p>Noted, the TA has assumed that train services would return to 4 per hr once the demand rises on the trains. Patronage data used in the assessment is based on pre-Covid conditions when trains were significantly busier, which was considered a robust way to study the impact as it would demonstrate a worst-case assessment. However, to be robust a new assessment has been undertaken with two trains per hour and updated patronage data provided by Network Rail. Full details are included on TN045 - Rail Impact Assessment for Mortlake Station (Appendix K).</p> <p>The updated rail assessment indicates that there is sufficient capacity for forecasted future passenger numbers in terms of station infrastructure and train capacity in 2022. Patronage data shows 77% decrease in train users at Mortlake station the reduction of train services to two per hour shows that the trains are still operating with more spare capacity than pre-covid.</p> <p>PTAL would be improved with the permeability of the site. In addition, it was agreed with TfL as part of the original application that the rating in the northwest corner is incorrect as it ignores the bus services that operate along Clifford Avenue. A bespoke PTAL assessment has been undertaken for the site and full details are included on TN047 - Stag Brewery PTAL Technical Note - Rev A (Appendix L).</p> <p>The assessment concludes that the PTAL score across the Site is in reality higher than the existing rating. The existing PTAL ratings show</p>	

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	the site is predominantly 1a and 2 whereas the results of the updated assessment using PTAL published guidance shows the Site is largely PTAL 2 with some pockets of 3.	
<p>D. Questions are raised over the robustness of using data dating back to 2016 and 2017, given its age, impact of COVID and closure of Hammersmith Bridge. The TA states that TfL are satisfied with the traffic assessment. Confirmation is sought from TfL.</p>	<p>New traffic surveys have been undertaken at the junctions of Chalker’s Corner, Great Chertsey Road / Dan Mason Drive / Hartington Road, Upper Richmond Road / Clifford Avenue and Lower Richmond Road / Mortlake High Street to compare with the 2016 / 2017 data used in the assessment. Full details are included in TN048 – Traffic Data Comparison (Appendix M).</p> <p>The results have concluded that there is a general decrease in peak hour traffic (0800-0900 and 1700 – 1800) from 2016/17 to 2022, which is the assessment times based on when the development generates the highest trips on the surrounding network. This is due to more people now working from home and travelling outside of peak hours.</p> <p>It is therefore considered that the previous modelling work should still be considered satisfactory and robust, as it was based on higher baseline traffic data. No further junction modelling is therefore proposed at this time. In addition, it is noted, that prior to implementation of the Chalkers Corner scheme as part of the Traffic Management Act 2004 Notification (TMAN), 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>	
<p>E. If concerns over the robustness of the TA are satisfied, the Chalker’s Corner light scheme is predicted to mitigate much of the traffic impact. The s106 would need to ensure the timely delivery of the</p>	Noted	

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Chalker's Corner scheme. TfL will need to commit to such delivery.		
F. Remain concerned over the ability of ensuring the proposal model split is achieved.	<p>Stantec: "Mode shares for the school have been taken as an average of three travel plan targets for local schools provided by LBRuT. These schools, Richmond Park Academy, Christ's Secondary School and Grey Court Secondary, all have an existing PTAL (2) similar to that of the proposed development site at the moment. This was the agreed approach for both the original consented scheme and GLA call in scheme.</p> <p>The school Travel Plan will also be implemented and provide LBRuT with a means to measure and monitor the mode share with a view to reduce travel by car. Should targets that are set not be met then additional measures will be required to be implemented to ensure mode share targets are achieved."</p>	
Ecology		
A. Ecology reports (PEA and PSR dated March 2022): Surveys have all been carried out in October 2021 – therefore not following their own (or the BCT 2016 guidance) recommendations (para 5.18 of the PEA dated March 2022) for surveys to be carried out either 2 with a two week break or monthly for 3 months (between May to August). The Protected Species report (para 2.15) states that the reason for this is due to the previous planning application programme hearing in July 2021, it then goes on to say that this is not a constraint due to the historical surveys carried out "providing a robust baseline data" and "further surveys will be carried to determine if amendments are necessary to the mitigation measure currently	<p>Updated Ecology surveys are being undertaken on the site following a meeting on 7 July 2022 where the scope of the surveys was discussed.</p> <p>As set out in the ES Statement of Conformity, the surveys will be submitted to LBRuT in full in due course. Whilst the surveys are being undertaken, Waterman IE will update the Survey Results Spreadsheet (SS) every Friday.</p>	

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<p>being proposed and to inform a licence application for NE". However, each survey is respectfully 3 years, 1 month and 2 years, 1 month apart, which is out of date and not as per the guidance.</p> <p>i. Internal surveys are still not supplied despite the availability of drones and other technology that could assist.</p> <p>ii. The Dec 2019 EIA has the Maltings wrongly numbered as B9 not B8.</p> <p>iii. The LPA expect a fully compliant suite of bat surveys over the summer period for a site of this complexity and size adjacent to the River Thames in the north and connecting to the railway and beyond in the south. The survey report needs to contain raw data and a plan to show the movement of bats seen on site.</p> <p>The LPA cannot assess or comment on these applications fully without the relevant and in date surveys, therefore have no alternative but to recommend refusal due to lack of Protected Species information at this time.</p>		
<p>Other comments:</p> <p>B. Light spillage - Demonstrate the new windows/internal light spill will not spill onto the river corridor or tree canopies, especially as brown long-eared bats have been recorded.</p>	<p>Given the final lighting design has not been designed at this stage, we would expect this to be dealt with via a condition for the final lighting design to be mindful of light spill to the river with lighting designed in compliance with the guidance published by the Institute of Lighting Professionals (ILP).</p>	
<p>C. Is there any reason why the meadow grassland by the school is not be included in the public realm area? What will the school be using it for? This would be a great addition to the public.</p>	<p>It is included. See - P10736-00-004-0701-03 Amenity Space and Green Space Calculation, prepared by Gillespies.</p>	

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D. Uplighting of trees and buildings in the squares will not be acceptable	<p>Unclear if this comment is in relation to Application B as no squares are within the design.</p> <p>Uplighting has been removed from Application A.</p>	Y – updated drawings provided for Application A.
E. The Peregrine falcon is a real asset for the site and there is concern that carrying out phase 1 works adjacent to the potential nesting location will scare it away – this will need to be considered by an falcon expert	<p>Please see meeting notes from meeting held on 7 July 22 with LBRuT planning and ecology officers. The meeting notes were issued to LBRuT on 18 July 2022.</p> <p>Watermans have also provided the following response: We are in agreement that the peregrine falcon is an asset for the Site and local area. As detailed in the Ecology Chapter that supported the EIA, mitigation measures have been provided both during the post the Development.</p> <p>During the construction period a CEMP will detail the requirement for an Ecological Clerk of Works (ECoW) who is a recognized peregrine falcon expert to monitor the roost site at the Maltings until it can be confirmed that the peregrine is absent from the building. Works will then be undertaken at the Maltings to block access points previously utilised. Monitoring will continue prior to the refurbishment works commencing at the Maltings to ensure the bird does not return to the roost site. In addition, and as a precautionary approach, and to avoid any potential disturbance events (given only a single peregrine falcon was recorded on site) the refurbishment works at the Site would be timed to commence outside of the main peregrine falcon breeding season (assessed to be between February / March when courtship intensifies to June when the young normally fledge).</p>	

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	<p>As part of the completed development a peregrine falcon nest box will be incorporated into the roof of the Maltings after the refurbishment works have been completed. This would be subject to a suitably worded planning condition. It is envisaged that this work would be overseen by an Ecological Clerk of Works (ECoW) who is a recognized peregrine falcon expert.</p> <p>A 'Landscape and Environment Management Plan' (LEMP), will also be provided as part of the completed development to ensure the peregrine nesting box has the best possible chance of uptake. The LEMP will ensure no direct lighting of the box and that measure are put in place for monitoring.</p>	
<p>F. What is the sqm of the biodiversity planting/area and where is it? it should not be the same planting areas as the play areas.</p>	<p>As the landscape is working really hard to accommodate large areas of greening along with the requirements for play, some of the amenity grassland areas will need to act as play areas. This is consistent with the play strategy, where play and nature are merged into one creating an immersive play experience for children. Please consult the UGF for sqm of each of the landscape typologies.</p>	
<p>G. Is there a plan to show the areas that are considered contributing to biodiversity.</p>	<p>The planting palette is indicative and it will be further developed at later stages - comment noted.</p>	
<p>H. The UGF for the school fails, this needs to be increased.</p>	<p>The originally submitted Landscape Design and Access Statement (page 79) sets out the proposed approach to the UGF for the school.</p> <p>This approach is considered acceptable.</p> <p>It is noted that the GLA support the proposed UGF.</p>	
<p>I. Brown roof should cater for the black redstart and more ledges for raptors.</p>	<p>Bird boxes (total 20 No.) are provided on roofs closer to the River Thames, including five Schwegler Boxes for swifts and fifteen (15) additional boxes for other bird types. These are to be oriented east or west to suit use.</p>	

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	Watermans response: The brown roof will provide foraging habitat for black redstart and five black redstart boxes are to be provided as part of the completed development. In addition a peregrine falcon nesting box is to be installed at the Maltings.	
J. Plant species acceptable, except the crocosmia – this is a non-native species.	The planting palette is indicative and it will be further developed at later stages - comment noted	
Waste		
A. For a once weekly collection suitable and sufficient space for 14 x 1100L bins would be required. A plan is necessary to demonstrate the bin store location is suitable for servicing and that it is suitably sized for the number of bins required	Please see plan ref: 18125_C645_Z3_P_00_001 Rev C, prepared by Squire & Partners has been submitted to supersede the previously provided drawing. The drawing has been updated to highlight the bin store.	Y – updated plan provided
B. Suitable space should be provided for the recycling of food waste – this is a service currently provided to schools in Richmond.	Noted	
Trees		
Unable to recommend this proposal for approval until these comments and queries have been responded to – once received officers can provide full advice.	Please see responses provided by Waterman IE below.	
<p>Further detail required:</p> <p>a) CAVAT Valuation: The LPA will require a tree-by-tree "Full" CAVAT valuation (Including the calculation methodology for each tree), to be included for each tree in the tree survey and undertaken by an Arboriculturist experienced in using the method. This is to ensure that any loss of amenity from tree removals is, as a minimum, commensurate with the value of the new tree planting proposals. Individual CAVAT valuation will an integral part of ensuring that</p>	Please see paragraph 3.2 of the document provided by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2- Arboriculture Response) (Appendix E).	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>all retained trees, both within and adjacent to the site, will receive appropriate protection during the preparation, demolition, construction and conclusion phases of a long and complex project.</p> <p>i. A CAVAT valuation is required for the 3x Local Authority Street trees flagged for removal (T107, T152 & T333), who's CAVAT valuation will be used to secure remuneration for off-site replacement tree planting in the public realm via a section 106 payment.</p>		
<p>b) Tree Root protection Areas (RPA). Update and provide existing site conditions: When illustrating the RPA of any tree trees, both on and adjacent to the site of the proposal. BS5837 (Trees in relation to design, demolition and construction - Recommendations: 2012) Section 4.6.2. specifies the following;</p> <ul style="list-style-type: none"> • "Where pre-existing site conditions or other factors indicate that rooting has occurred asymmetrically, a polygon of equivalent area should be produced. Modifications to the shape of the RPA should reflect a soundly based Arboricultural assessment of likely root distribution." • These modifications are to account for and include but not be limited to; "The morphology and disposition of the roots, when influenced by past or existing site conditions (e.g. the presence of roads, structures and underground apparatus)" • RPA's in submitted Tree Constraint Plans (TCP) and Tree Protection Plans (TPP) must be calculated and modified to account for asymmetric root development 	<p>Please see paragraph 3.2 of the document provided by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2- Arboriculture Response) (Appendix E).</p>	

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in the proximity of existing structures and hard surfacing as part of the full application.		
<p>c) Shading:</p> <p>i. The impact of shading needs to be assessed and incorporated as part of the submitted Arboricultural documentation.</p> <p>ii. There is also an increased risk that such shading will lead to an increase in post-development pressure on affected trees for their eventual removal. It must be stipulated that any such future requests for tree removal for these reasons will be resisted as per the Councils Local plan and tree policy.</p>	Please see paragraph 3.2 of the document provided by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
d) Tree loss: Concerns around the future of T83-86 and T68 should be considered as part of a more detailed design that can be secured through the production of an Arboricultural Method Statement.	Please see paragraph 3.4-3.5 of the document provided by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
e) Lighting Provision: The positioning and design of lighting in relation to proposed and existing trees needs to be carefully considered regarding potential obstructions to illumination (Especially regarding sports pitch lighting), with particular attention given to the requirement for increased management and maintenance of these trees as they grow. Potential obstructions need to be highlighted and alternative lighting positions submitted and agreed by the LPA in cases where such conflicts are identified.	Please see paragraph 3.2 of the document provided by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
f) Hard Surfacing and Footpaths: Need to see that that sports surfacing, footpaths and other areas of hard surfacing areas near retained trees use a permanent no-dig solution (ie.cellweb), not just as protection	Please see paragraph 3.2 of the document provided by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	

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measures during the demolition and construction phase. Design details and drawings (including a cross-section) will need to be supplied and be "site-specific".		
<p>Necessary amendments:</p> <p>g) Tree protection</p> <ul style="list-style-type: none"> • Section 8.13 of the report states "Tree protection should generally accord with the recommendations contained within BS5837:2012". Remove the word "Generally" and "Should" with "Will", unless otherwise previously agreed in writing with the local planning authority. • A detailed Arboricultural Method Statement (AMS) incorporating a Tree Constraints Plan (TPP) and Tree Protection Plan (TPP) is required. 	This point is accepted, and the Arboricultural Impact Assessment has been revised accordingly.	Y – revised AIA submitted.
<p>Recommended Conditions:</p> <p>h) Tree planting - further information / detail</p> <p>i) Foundation design - details of foundation design and methodology for installation and construction that does not deleteriously impact nearby trees.</p> <p>j) Underground services - Impact on the roots of retained trees properly assessed. Where a conflict is identified, a methodology of installation that avoids damage to tree roots must be submitted to the LPA for approval.</p> <p>k) Tree protection</p>	Please see paragraphs 2.30-2.31 of the document provided by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	
<p>Recommended informatives:</p> <p>l) Foundation Design and a firm commitment made to the use of "Minimally invasive foundations" within RPA's of retained trees, where there is an incursion.</p>	Please see paragraphs 2.30-2.31 of the document provided by Waterman IE, dated 27 July 2022, titled 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response) (Appendix E).	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>The pedestrian circulation drawing from 22/0900/FUL and school travel plan in 22/0902/OUT shows two routes being used through Mortlake Green, including as an off-road cycle route. The Parks team will look at this and get an updated quote to discuss as part of the potential s106 arrangements.</p>	<p>This is correct - See drawing ref: P10736-00-004-GIL-0125 of the Landscape drawing pack.</p> <p>Please advise on the quote.</p>	
<ul style="list-style-type: none"> • Other contents of S106 / HOTs to follow 	<p>Noted – please advise on the details of the suggested HoTs.</p>	
Environmental Health - Air Quality		
<p>A. Demolition</p> <p>i. Likely effects on local air quality have been suitably assessed.</p> <p>ii. The Site is a high-risk site and suitable mitigation (as set out later in the ES Air Quality Chapter) is required to ensure that adverse effects are minimised to the maximum possible extent.</p>	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>
<p>B. Input data and assumptions</p> <p>i. Vehicle emissions used</p> <ul style="list-style-type: none"> • The input data used in the air quality modelling undertaken to predict pollutant concentrations in the opening year of the proposed development is not considered conservative and is likely to underestimate the impacts on existing receptors in the opening year. 	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement</p>

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<ul style="list-style-type: none"> • Given the sensitivity of the site, in terms of air pollution, a conservative approach should have been applied in the assumptions made. o It is known that Defra’s vehicle composition estimates projections are optimistic. o It is standard practice to assume at least a couple of years delay in the fleet composition as defined in the Emission Factor Toolkit database to account for a lower vehicle fleet turnover rate (for instance, to predict ambient air concentrations for 2029, 2026 or 2027 vehicle emissions should had been used instead for a more realistic – and conservative approach). o As an illustration, in 2022 the database assumes that 52% of all cars in Outer London are Euro 6c and 11% are Euro 6 standard which is overoptimistic and is unlikely to represent the real vehicle fleet in the study area). 		of Conformity.
<p>ii. Background years used</p> <ul style="list-style-type: none"> • It has been assumed backgrounds are declining as per DEFRA’s estimated declining rates overtime which are equally optimistic. • Background levels should have also been conservative, and in line with earlier vehicle composition years of 2026 or 2027. To support this, the baseline pollution levels reported in the ES Air Quality Chapter are lower in comparison to both the LBRUT monitoring results for 2019 and LAEI modelled results for the same year. Therefore, predictions made for the opening year pollution levels are also like to be underestimated. 	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>

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<p>iii. Traffic data used</p> <ul style="list-style-type: none"> It is unclear what trip generation (vehicles movements per day) is produced by the proposal. In the air quality neutral report (Table A4) refers to 97000 vehicle movements per year. Assuming a 200-day calendar year, that would equate to 485 trip generation (per day). However, the ES Transport assessment refers to different numbers being generated by the operation of the school, daily. Therefore, clarification is needed to ascertain the trip generation of the proposed school so that final air quality calculations can be undertaken. Explanation to be provided on calculations undertaken to go from AM and PM peak generation to trip generation (daily and annual). As a reference, GLA's Air Quality Neutral Guidance (2014) gives as an annual average TRAVL Trip Rates for D1 46.1 trips/m² /annum (Table A1.1). This is significantly higher than the calculated trips/m² /annum for the proposed school. 	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>
<p>iv. Modal assumptions</p> <ul style="list-style-type: none"> The Education mode share has been taken as an average of three travel plan targets for local schools (Richmond Park Academy, Christ's Secondary School and Grey Court Secondary), have an existing PTAL (2) similar to that of the proposed development site at the moment. However, other considerations need to be taken into account including socioeconomic background of schoolchildren and post code of residence to ascertain whether the assumed 8% car 	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE Watermans have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
use by the students and staff is suitable or if it is an underestimation of vehicle movements associated with the operation of the proposed school.		
<p>v. Model verification and adjustment</p> <ul style="list-style-type: none"> • The EHO at LBRuT has previously requested that urban background concentrations from the Wetlands Centre, Barnes were used in the air quality assessment. However, background concentrations from Defra’s predictions have been used instead. This is not supported; local measurements should had been used to ensure a robust assessment. • Given that verification and adjustment is compared with and applied on modelled road NOx concentrations, the higher the background values used in the baseline year, the lower the traffic contributions derived and the lower the adjustment factor required, which, again, does not provide a conservative approach. 	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>
<p>vi. Monitoring data collected by the applicant</p> <ul style="list-style-type: none"> • The monitoring data reported is not sufficient to characterise baseline conditions in the peer review undertaken. The submission has undertaken a six-month monitoring survey spanning from 9th July 2018 to 3rd January 2019 which consisted of deploying two NO2 diffusion tubes at 10 monitoring sites. o no information on the location of the monitoring sites used is provided (no tabulation of the eastings and northings nor mapping of locations were provided - Figure A1 is missing). 	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix G).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>o more recent and complete monitoring information is available to ascertain the baseline conditions to the application site, as published by LBRUT in their ASR 2020, reporting data for 2019. Namely, a full year of ratified data for 2019, which includes location ID74 and fully supported by GLAs modelling of NO2 annual mean values across the Borough for the same year.</p> <p>o Diffusion tubes ID 74 and ID 70 are located along the same road as the application site and report significantly higher values than the reported in the ES Chapter on air quality monitoring – this is also highlighted by GLA’s modelling of NO2 annual mean values along the application site for the same year (2019).</p>		
<p>C. Air quality levels:</p> <p>i. It is observed that in 2019 (before the pandemic), the schools closest air quality monitoring sites along Lower Richmond Road (ID 74 - Lower Rich Rd, Mortlake- near Chalker's corner and ID 70 - Stag Brewery, Lower Richmond Road), read 52 and 42ug/m3 respectively, and when adjusted to the façade of relevant exposure indicate 45.7 and 41.3 ug/m3 ambient air pollution levels, correspondingly, which are above the nitrogen dioxide (NO2) annual mean limit value set to safeguard human health. Given the close proximity of the school to the same road and the likely significant increase of traffic due to rerouting resulting from closure of Hammersmith bridge, schoolchildren would likely be exposed to elevated levels of air pollution (which safety limits are</p>	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>currently being revised by the epidemiological community). Therefore, the proposed location is considered of high risk for public exposure and not suitable for a school.</p> <p>ii. It is acknowledged that the air quality modelling results in the Air Quality Chapter of the ES (Chapter 10) submitted suggest annual mean values of NO₂ well below the limit value. However, the assessment is considered to be optimistic and has not followed a conservative approach, assuming backgrounds are declining as per DEFRA's rapid estimated declining rates as well as assuming the turnover of the national fleet to follow optimistic national predictions, with extremely high penetration of clean vehicles in 2029 (which is only seven years from now). It is also noted that the baseline pollution levels reported in the ES Air Quality Chapter are underestimated in comparison to the both the LBRUT monitoring results for 2019 and LAEI modelled results for the same year. Therefore, predictions made for the opening year pollution levels are also like to be underestimated.</p> <p>Figure 4 presents levels of pollution at the residential dwellings in close proximity to the road within air quality hot spots along the junction of Lower Richmond Rd and A316. As LAEI air pollution mapping indicates, properties are predicted to be exposed to values above the annual mean NO₂ limit value set to safeguard human health. The LAEI modelling is supported</p>		

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>by the Local Authority monitoring network, which in 2019 measured 52 ug/m3 at monitoring site ID 74 (Lower Rich Rd, Mortlake - near Chalker's corner), which once corrected to the façade of relevant exposure indicates an annual mean value of 45.7 ug/m3 for NO2, well above the limit value to protect human health.</p> <p>A. For a once weekly collection suitable and sufficient space for 14 x 1100L bins would be required. A plan is necessary to demonstrate the bin store location is suitable for servicing and that it is suitably sized for the number of bins required</p>		
<p>D. Air quality neutral calculations</p> <p>i. As per the traffic data provided, the proposal for the school is air quality neutral for transport emissions. However, several issues need to be fully clarified and agreed on before the air quality neutral status for the proposal can be confirmed:</p> <ul style="list-style-type: none"> • The trip generation for the proposed school is excessively low, equating to 10.4 number of trips per m2 per annum (trips/m2/annum). Average TRAVL trip rates for schools equate to 46.1 number of trips per m2 per annum. The trip generation reported and used in the air quality calculations is 4.4 times lower. • The methodology used to derive the modal share associated with the operation of the proposed school, 	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>deviates from standard practice and is based on the rather optimistic assumption that Travel Plan targets (adopted by other schools) are already achieved for the proposed school. Whereas such targets are to be set in the School Travel plan and secured via a bond and or condition, it is considered inappropriate their use both in the air quality assessment and in the air quality neutral calculations, in the opening year of the proposal. This played a significant role in the excessive low trip generation used. In addition, taking an average of targets set for other schools of similar PTAL is based on the assumption that the same can be achieved at the location of the proposed school can easily prove unrealistic. Social economic factors as well as postcode of residence of the schoolchildren may result in differing trip rates. Standard procedures should be used; this will also secure consistency across other similar planning applications and achieve more realist estimates of traffic emissions. It is important to highlight that TFL also does not support the approach followed.</p> <ul style="list-style-type: none"> • clarification is needed on trip generation value per day for the school to confirm the reported annual trip generation for 1200 students and 60 staff in the opening year without assuming the Travel Plan targets are met year zero. • a conservative approach is required so that the appropriate level of mitigation is ascertained and suitable mitigation measures are agreed, deployed and monitored. 		

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<ul style="list-style-type: none"> The air quality neutral calculations will need to be confirmed, once the trip generation (daily) is mapped in a business-as-usual scenario, before the Travel Plan targets are achieved. 		
<p>E. Air quality positive observations</p> <p>i. additional work is required to agree suitable air quality positive measures for the proposed school.</p> <p>ii. no suitable air quality positive measures have been specifically selected and proposed and negotiations with the LA need to take place to agree and secure a suitable list of school specific air quality positive measures including, but not restricted to:</p> <ul style="list-style-type: none"> o Relevant measures from the Mayors Schools Toolkit measures. o Green infrastructure incorporated into design of school to protect schoolchildren playground areas, entrance, etc o Make sure the layout of the school minimizes exposure to air pollution o Robust School Travel Plan o Consideration of green school buses 	<p>Air Quality comments initially addressed in note, prepared by Waterman IE, dated June 2022 (Appendix F).</p> <p>Further comments have since been issued by LBRuT, prepared by AQE Global, dated July 2022.</p> <p>Waterman IE have provided a further response in the ES Statement of Conformity at Annex 2 (Appendix G).</p>	<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement of Conformity.</p>
<p>F. Recommendation</p> <p>i. Once appropriate traffic generation associated with the operation of the school is ascertained, officers can assess whether the proposal is air quality neutral</p> <p>ii. If not air quality neutral, suitable mitigation will be required to be calculated and secured via S106, because</p> <ul style="list-style-type: none"> o the sensitivity of the application site area in terms of air pollution, 		<p>Y – note issued to LBRuT on 29 June 2022.</p> <p>Y- Annex 2 of the ES Statement</p>

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<ul style="list-style-type: none"> o the likely underestimation of the impacts of the proposed scheme on local air quality o the likely underestimation of the impacts of cumulative schemes on the school site itself, o the need to have school specific mitigation measures to make the proposal air quality positive in an effective and measurable way <ul style="list-style-type: none"> • Condition o Air Quality - Low Emission Strategy as Part of the School Travel Plan o Reducing Emissions from Demolition and Construction 		of Conformity.
Environmental Health – Noise and Odour		
Recommend the following conditions: <ul style="list-style-type: none"> • Noise impact from demolition and construction activity upon residents in the vicinity of the development 	Please see para 1.11 of 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 29 July 2022 (Appendix I).	
<ul style="list-style-type: none"> • Dust emissions from demolition and construction activities impacting upon residential properties in the vicinity 	Agreed, subject to suitable condition wording.	
<ul style="list-style-type: none"> • The internal noise of the proposed school requires protection 	Agreed, subject to suitable condition wording.	
<ul style="list-style-type: none"> • Noise generated from the sports playing facilities and multi games use area (MUGA) Noise Control 	Please see paras 1.13-1.15 of 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 29 July 2022 (Appendix I).	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
• Details of the acoustic fencing for the sports pitch	Please see paras 1.16-1.19 of 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 29 July 2022 (Appendix I).	
• Noise from mechanical services plant including heating, ventilation and air conditioning (HVAC) and kitchen extraction serving the proposed development affecting existing residential properties in the vicinity of the proposed development	Please see paras 1.20-1.21 of 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 29 July 2022 (Appendix I).	
• Impact from odour from use of kitchen extraction equipment	Agreed, subject to suitable condition wording.	
• Light impact from the sports pitch lighting upon residents	Suggested condition wording requested.	
Environmental Health – Contaminated Land		
Recommends conditions	Please can details be provided of the recommended conditions	
CIL		
The actual amount of CIL can only be confirmed once all relevant details are approved and any relief claimed.	Noted	
12. Lead Local flood Authority		
a) Drainage hierarchy: MORE INFORMATION REQUIRED – the green roof and water butts should be shown on the drainage drawing.	See paragraphs 2.2-2.4 of the Drainage and Flooding response note, prepared by Waterman IE, dated August 2022 (Appendix N).	
b) Runoff rate: i. FAIL – The proposed runoff rate of 249l/s is much higher than the greenfield runoff rate of 44.1l/s. Consideration should be made to additional attenuation features such as blue roofs to reduce the proposed runoff rate. The site area used to calculate	See paragraphs 2.6, 2.8, & 2.10-2.15 of the Drainage and Flooding response note, prepared by Waterman IE, dated August 2022 (Appendix N).	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>the 100 year greenfield runoff rate of 44.1l/s should be confirmed. ii. MORE INFORMATION REQUIRED – the existing (brownfield) runoff rate needs to be supplied for 1 in 1 year event and a 1 in 30 year event. All runoff rates should be presented in the SuDS proforma. iii. The applicant has submitted information which has not sufficiently addressed policy relating to London Plan Policy SI 13. Until the above points are addressed, matters relating to volume control, Non-Statutory Technical Standards for SuDS S7-S9 and future maintenance have not been assessed due to their reliance on suitable proposals for sustainable drainage features and runoff rate restrictions.</p>		
External Consultee responses		
<p>No comments received from the following consultees</p> <ul style="list-style-type: none"> • CCG • Transport for London • Greater London Authority • London Borough of Hammersmith & Fulham • Natural England • Southern Western Train • Network Rail 	<p>The applicant is aware of responses from TfL, GLA and Network Rail since receipt of these comments.</p>	
<p>No objections raised from the following consultees (subject to conditions):</p> <ul style="list-style-type: none"> • London Borough of Wandsworth • Environment Agency • Historic England (Archaeology 		
<p>Consultees not wishing to comment</p> <ul style="list-style-type: none"> • London Borough of Hounslow • Historic England (planning) 		

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<ul style="list-style-type: none"> Secretary of State / National Planning Casework Unit 		
<p>1. Thames Water</p> <p>A. Waste Comments: With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available</p>	<p>The Foul Water and Utilities Assessment issued as part of the application provided correspondence from Thames Water confirming that there was sufficient capacity in the sewage systems to serve the development (p. 46).</p>	
<p>B. SURFACE WATER drainage: Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.</p>	<p>Noted</p>	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>C. Water Comments</p> <p>i. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains</p> <p>ii. The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Recommend condition.</p> <p>i. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available</p>	<p>(i) Noted.</p> <p>(ii) The Foul Water and Utilities Assessment issued as part of the application provided Thames Water correspondence dated 17 November 2017 which states there are no diversions required. Under the diversions section the quote states <i>“From our records, we don’t anticipate that any clean water assets need to be diverted to accommodate your proposals.”</i></p> <p>(iii) As noted above for water comments.</p>	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>D. Groundwater:</p> <p>i. Thames Water expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.</p> <p>ii. Informatives:</p> <ul style="list-style-type: none"> • Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. • There are public sewers crossing or close to your development. The applicant is advised to read the guide working near or diverting our pipes. • A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer <p>iii. Conditions: No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water</p>	Noted	
<p>E. Foul water:</p> <p>i. Need to confirm the foul water manhole reference numbers which the development proposes to connect into.</p> <p>ii. Need to confirm which areas of the development will drain to each of those connection points to the public foul sewer system, to allow Thames Water to</p>	i.-iv. See paragraph 4.13 of the Drainage and Flooding response note, prepared by Waterman IE, dated August 2022 (Appendix N).	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>calculate the impact of the additional foul flows on the local foul sewer system.</p> <p>iii. specify either the anticipated flow rate through each proposed foul water manhole, or the number and type of buildings (e.g. 300 dwellings, 500m2 of offices).</p> <p>iv. Regarding Surface Water, the site plans state that some surface water currently enters the foul sewer system and that this will be removed. Confirm what flow rate will be removed, and from which section of the foul sewer?</p>		
<p>2. Metropolitan Police</p> <p>a) Conditions - Secured by Design and evidence of such accreditation. (The design guidance contained within Secured by Design New Homes 2019, Commercial 2015 and Schools 2014 guides. These guides are subject to continual updates so the most recent guide should be referred to)</p> <p>b) Request discussions on:</p> <p>i. Permeability</p> <p>ii. CCTV</p> <p>iii. Lighting</p> <p>iv. Security for flats / communal entrances</p> <p>v. Gates, storage and outbuildings</p>	<p>Noted – discussions with Metropolitan Police would be welcomed as part of the detailed design process following the receipt of planning permission.</p>	
<p>3. Sport England</p> <p>No objections, subject to the proposals/S106/inclusion of planning conditions;</p> <p>a) Acoustic mitigation: A plan is required showing the location of an additional acoustic barrier and</p>	<p>Please see paras 1.23-1.27 of 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 29 July 2022 (Appendix I).</p>	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>confirmation from the Council's Environmental Health Officer that the artificial pitch can be used up to 9PM.</p> <p>b) Section 106 agreement</p> <p>a. To ensure the needs of Barnes Eagles were met and included the following provisions.</p> <ul style="list-style-type: none"> • £90,750 [Index Linked] towards the provision of temporary football pitches. • Top-up Barnes Eagles Contribution of £45,375 paid upon every anniversary of the vacation date commencing on the third anniversary • The existing licence agreement for Barnes Eagles will not be terminated until the Initial Barnes Eagles contribution has been paid to Barnes Eagles. <p>b. The whole of the area where the sports fields are located would not be built on (school and community park) until a contract has been signed with the school operator to build the school and the associated facilities;</p>		

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>c. Both the artificial pitch and sports hall are required to meet the needs of the residential development. Sport England requires that the legal agreement ensures that if it is decided not to build the school then the developer will provide a sports hall and artificial pitch within the Stag Brewery site OR will retain the existing playing field and sports pavilion and that this will be provided for use by the community with an appropriate management and maintenance scheme.</p>		
<p>d. Measures to ensure that any properties built near to the artificial pitch will not have balconies and have appropriate ventilation so that windows can be closed as needed when the pitch is in use. Sport England would like to review this text.</p> <p>e. Community use agreement</p> <p>c) Planning conditions</p> <p>a. Provision and design of sports hall and facilities</p> <p>b. Design and layout of AWP and MUGA</p> <p>c. Pitch quality</p> <p>d. Facility registered on the Football Association's Register of Football Turf Pitches</p> <p>e. Hours of AWP</p> <p>f. Management and Maintenance Scheme for the facility</p>	<p>Please see paras 1.28-1.30 of 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 29 July 2022 (Appendix I).</p>	
<p>4. Marine Management Organisation</p> <p>a) Works below mean high water mark may require a Marine License</p>	<p>A consultation exercise with the MMO is ongoing, led by Waterman IE, separate to the planning process.</p>	

LBRuT Comment (27 May 2022)	Applicant Response (18 August 2022)	Revised information submitted (Y/N)
<p>b) A wildlife licence is required for activities that would affect a UK / European protected marine species.</p> <p>c) Environmental Impact Assessment - If this consultation relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link</p> <p>d) Marine Planning - Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons.</p>		

Health and Safety Executive (HSE) comments**Application A (ref: 22/0900/OUT)**

The table below sets out the Applicant's response to the comments received in respect of the applications for planning permission at the Former Stag Brewery site: Application A: for masterplan redevelopment (ref: 22/0900/OUT) on 27 May 2022 from the Health and Safety Executive (HSE).

HSE comment (27 May 2022)	Applicant Response (27 July 2022)	Additional Information Submitted (Y/N)
Detailed		
Regarding the first part of the hybrid application for the detailed application, it is noted that the proposed buildings contain blocks which are served by single staircases. In a fire scenario, the proposed single staircases operate as the escape stair as well as the firefighting stair.	See response provided on page 1 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	n/a
The buildings 2, 3, 6, 7, 8, 11 & 12 are connected by way of a basement containing a carpark and ancillary areas.	See response provided on pages 1-2 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	Yes – plans updated
<i>Means of escape and fire service access</i>		
The fire statement (section 7) and the plan drawings indicate that the single staircase of buildings 2, 7, 8, 11 & 12 descend to the basement level. The basement contains various ancillary areas such as a large carpark, multiple plant rooms, cycle stores and refuse areas, which connect with the single staircases by way of lobbies/corridors.	See response provided on page 2 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	Yes – plans updated
The fire safety standard states that a single stair should not serve a basement level. Moreover, where a staircase forms part of the only escape route from a flat, it should not serve ancillary accommodation (applicable in addition to buildings 4 and 10). Resolving these issues will affect land use planning considerations such as the design, layout and appearance of the development if, for example, separate stairs are to be provided for the basement level and no connection with the single stairs is ensured.	See response provided on page 2 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	Yes – plans updated

HSE comment (27 May 2022)	Applicant Response (27 July 2022)	Additional Information Submitted (Y/N)
<p>The plan drawings illustrate that the lifts in buildings 2, 7, 8, 11 & 12 descend to the basement level. A lift should not continue down to serve a basement storey if it is in a building, or part of a building, served by only one escape staircase. Resolving this issue may affect land use planning considerations such as the design, layout and appearance of the development if, for example, separate lifts are to be provided for the basement.</p>	<p>See response provided on page 2 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).</p>	<p>Yes – plans updated</p>
<p>The basement plan drawing of Area 1 illustrates multiple refuse stores designated to serve the above residential buildings. Due to the fire risks associated with waste, refuse stores should be approached solely from the outer air and should be separated from other parts of the building. Accordingly, design changes necessary to ensure appropriate location and separation of the bin stores will affect land use planning considerations such as the design and appearance of the development.</p>	<p>See response provided on page 2 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).</p>	<p>Yes – plans updated</p>
<p>The planning statement (section 12.36) and the plan drawings indicate that the proposed development contains residential units which are designed as wheelchair user units. However, the fire statement (section 6) states that there are no such units ("none") and it does not provide information about any wheelchair user refuge in case of fire. When establishing the refuge areas, consideration should be given to the location of the dry riser outlets. The presence of charged fire hoses could hinder effective use of the disabled refuge; likewise, the use of a refuge could prevent access to the dry riser outlet. Ensuring suitable provision of disabled refuges may affect land use planning considerations such as the design and layout of the building as well as the health, safety and wellbeing of the future intended occupants.</p>	<p>See response provided on page 3 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).</p>	<p>Yes – Fire Statement updated</p>
<p>Outline</p>		

HSE comment (27 May 2022)	Applicant Response (27 July 2022)	Additional Information Submitted (Y/N)
<p>Regarding the second part of the hybrid application for the outline application with all matters reserved, it is noted that there are some plan drawings illustrating the buildings design in principle. The buildings 13, 15, 16 & 17 are connected by way of a basement containing a carpark and ancillary areas. It appears that these buildings contain blocks with single staircases which, in a fire scenario, operate as the escape stair as well as the firefighting stair.</p>	<p>See response provided on page 3 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).</p>	<p>Yes – plans updated</p>
<i>Means of escape and fire service access</i>		
<p>The fire statement (section 7) and the plan drawings indicate that the single staircase of buildings 13, 15, 16 & 17 descend to the basement level. The basement contains various ancillary areas such as a large carpark, multiple plant rooms, cycle stores and refuse areas, which connect with the single staircases by way of lobbies/corridors.</p>	<p>See response provided on page 3 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).</p>	<p>Yes – plans updated</p>
<p>The fire safety standard states that a single stair should not serve a basement level. Additionally, where a staircase forms part of the only escape route from a flat, it should not serve ancillary accommodation. Resolving these issues will affect land use planning considerations such as the design, layout and appearance of the development if, for example, separate stairs are to be provided for the basement level and no connection with the single stairs is ensured.</p>	<p>See response provided on page 3 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).</p>	<p>Yes – plans updated</p>
<p>The plan drawings illustrate that the lifts in buildings 13, 15, 16 & 17 descend to the basement level. A lift should not continue down to serve a basement storey if it is in a building, or part of a building, served by only one escape staircase. Resolving this issue may affect land use planning considerations such as the design, layout and appearance of the development if, for example, separate lifts are to be provided for the basement.</p>	<p>See response provided on page 4 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).</p>	<p>Yes – plans updated</p>

HSE comment (27 May 2022)	Applicant Response (27 July 2022)	Additional Information Submitted (Y/N)
The basement plan drawing for Area 2 illustrates multiple refuse stores designated to serve the above residential buildings. Due to the fire risks associated with waste, refuse stores should be approached solely from the outer air and should be separated from other parts of the building. Accordingly, design changes necessary to ensure appropriate location and separation of the bin stores will affect land use planning considerations such as the design and appearance of the development.	See response provided on page 4 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	Yes – plans updated
Because the second part of the hybrid application for the outline application has all matters reserved, HSE is unable to provide a full comment for this part. Should the Local Planning Authority be minded to grant outline planning permission, we strongly recommend the following: <ul style="list-style-type: none"> • the outline planning permission is subject to a suitable condition requiring the submission of a satisfactory fire statement with any reserved matters application, and • that HSE is consulted in conjunction with the Local Planning Authority's consideration of any reserved matters application. 	See response provided on page 4 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	n/a
This would ensure the purpose of HSE being made a statutory consultee for such applications is achieved.	Noted	n/a
It is recommended that the applicant uses the fire statement form available on gov.uk to provide the fire safety information.	Noted	n/a
2. Supplementary Information for the applicant		
Regarding the basement car parks for Area 1 and Area 2, the planning statement (section 15.15) states that "20% of car parking spaces will be provided with active electric charging provision, and 100% of the remaining spaces will be provided with passive electric charging provision". It may be advisable to consider the risk to fire safety by the presence	See response provided on page 5 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	n/a

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<p>of the electric vehicles (EVs) in the basement car parks as well as the presence of electric bikes because they contain lithium-ion batteries. Lithium-ion batteries may suffer thermal runaway and cell rupture, releasing large volume of toxic gases, heat and smoke before catching fire as well as afterwards. When they burn, a large amount of water is needed to flow on the batteries, however, fire keeps flaring up even after it appears to be extinguished. Furthermore, there is a danger of electrical shock for firefighters tackling a fire due to the high voltage used in EVs. Any consequent design changes may affect land use planning considerations such as layout, appearance, and car parking provision of the development.</p>		
<p>The plan drawings illustrate that the buildings 2, 7 & 8 contain firefighting lifts with dual entry. The fire safety standard states that the use of dual entry firefighting lifts is not recommended in residential buildings. Any consequent changes, in rectifying this may affect land use planning considerations such as design and appearance of the development, including the main entrance arrangements more generally.</p>	<p>See response provided on page 5 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).</p>	<p>Yes – plans updated</p>
<p>The fire statement (section 8) states that "certain corridors have extended travel distances in a single direction and is addressed with a fire engineered justification including the provision of additional smoke ventilation." However, if an engineered approach to fire safety is applied, then a "Qualitative Design Review" (QDR) is needed to determine whether the fire safety provisions are appropriate. As part of the hazard assessment process, an assessment of "what if" events should be made to identify system failures or foreseeable events that might have a significant influence on</p>	<p>See response provided on page 5 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).</p>	<p>Yes – preliminary QDR will be carried out in due course and issued to LBRuT.</p>

HSE comment (27 May 2022)	Applicant Response (27 July 2022)	Additional Information Submitted (Y/N)
the outcome of the study. An example could be “what if” the power supply to smoke vents fails?		
From the information provided on the fire statement it does not appear that a QDR has been undertaken, such that it has informed the design presented to the LPA. In circumstances such as this, best practice is for a QDR to be undertaken concurrently with design development, prior to the submission of a planning application. This approach would provide explanatory information to support the planning application. The outcome of the QDR could result in design changes which may affect land use planning considerations.	See response provided on page 6 of Hoare Lea’s document, titled ‘Responses to the HSE Substantive Response for Stag Brewery’, dated 27 July 2022 (Appendix P).	Yes – preliminary QDR will be carried out in due course and issued to LBRuT.
The plan drawings of building 4 illustrate the firefighting stairs and lifts to run blind through the 4th floor. The fire statement (section 4) states that no formal consultation has been undertaken to date. However, it should be determined that there is adequate access for fire-fighting personnel to set up a bridgehead on any required floor. Additionally, the fire safety standard states that where lifts are proposed to run blind there should be early consultation with the local fire and rescue service. Any subsequent changes may affect land use planning consideration such as the design and layout of the development.	See response provided on page 7 of Hoare Lea’s document, titled ‘Responses to the HSE Substantive Response for Stag Brewery’, dated 27 July 2022 (Appendix P).	Yes – plans updated
The fire statement (section 13) states that “some existing public hydrants are provided within 90m of all blocks. Where this is not the case, additional private hydrants will be provided.” However, the fire service site plan (fire statement, section 14) does not illustrate the water hydrants’ locations that the proposed development relies on and associated distances.	See response provided on page 7 of Hoare Lea’s document, titled ‘Responses to the HSE Substantive Response for Stag Brewery’, dated 27 July 2022 (Appendix P).	n/a
It is noted that some buildings are not relevant buildings as their height is under 18 m, however, they are within the	See response provided on page 7 of Hoare Lea’s document, titled ‘Responses to the HSE Substantive	Yes – plans updated

HSE comment (27 May 2022)	Applicant Response (27 July 2022)	Additional Information Submitted (Y/N)
curtilage of the relevant buildings. The following advice is offered with that context in mind.	Response for Stag Brewery', dated 27 July 2022 (Appendix P).	
The fire statement (section 7) and the plan drawings indicate that the single staircase of buildings 3 and 6 descend to the basement level. The basement contains multiple ancillary areas such as a large carpark, multiple plant rooms, cycle stores and refuse areas, which connect with the single staircases by way of lobbies/corridors.	See response provided on page 7 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	Yes – plans updated
The fire safety standard states that a single stair should not serve a basement level. Moreover, where a staircase forms part of the only escape route from a flat, it should not serve ancillary accommodation (applicable in addition to building 9). Resolving these issues will affect land use planning considerations such as the design, layout and appearance of the development if, for example, separate stairs are to be provided for the basement level and no connection with the single stairs is ensured.	See response provided on pages 7-8 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	Yes – plans updated
The plan drawings illustrate that the lifts in buildings 3 and 6 descend to the basement level. A lift should not continue down to serve a basement storey if it is in a building, or part of a building, served by only one escape staircase. Resolving this issue may affect land use planning considerations such as the design, layout and appearance of the development if, for example, separate lifts are to be provided for the basement.	See response provided on page 8 of Hoare Lea's document, titled 'Responses to the HSE Substantive Response for Stag Brewery', dated 27 July 2022 (Appendix P).	Yes – plans updated

Appendices

- A. Excel Spreadsheet, prepared by BNP Paribas, dated 13 June 2022 (issued to LBRuT on 13 June 2022).
- B. 'Briefing Note', prepared by Montagu Evans, dated 9 August 2022.
- C. RHP Letter, dated 15 June 2022 (issued to LBRuT on 16 June 2022).
- D. 'Consultees Responses' note, prepared by BNP Paribas, dated 28 July 2022.

- E. 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response), dated 27 July 2022.
- F. Air Quality Response Note, prepared by Waterman IE, dated June 2022 (issued to LBRuT on 29 June 2022).
- G. Annex 2: Air Quality Assessment Update of the ES Letter of Conformity, prepared by Waterman IE.
- H. Air Quality Responses (ref: WIE18671-114-BN-1.2.5-AQ Response), prepared by Waterman IE, dated August 2022.
- I. 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 23 June 2022 (issued to LBRuT on 29 June 2022).
- J. Indicative school green wall elevation, prepared by Squire & Partners, ref: C645_Z3_E_AL_002.
- K. TN045 - Assessment of Rail Impacts - Rev A, dated 27 June 2022, prepared by Stantec.
- L. TN047 - Stag Brewery PTAL Technical Note - Rev A, dated 1 July 2022, prepared by Stantec.
- M. TN048 - Traffic Data Comparison, dated July 2022, prepared by Stantec.
- N. Drainage Response Note, prepared by Waterman IE, dated August 2022.
- O. Email from Fulham Reach Boat Club, dated 17 June 2022.
- P. HSE Response Note, dated 27 July 2022, prepared by Hoare Lea.