

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA290121-4937

26 February 2021

Dear [REDACTED]

Thank you for your request for information which the GLA received on 29 January 2021. Your request has been dealt with under the Freedom of Information Act 2000.

You asked for:

I hereby would like to make a Freedom of Information request for the release of copies of correspondence exchanged before 15th July 2019 between GLA and Avanton (or associated parties) in relation to the planning application for a proposed redevelopment at 84 Manor Road, TW9 1YB (GLA reference 4795). For the avoidance of doubt, I would like these copies to be provided in digital format.

Our response to your request is as follows:

Please find attached the information the GLA holds within scope of your request. Please note that the names of GLA staff and third parties is exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

Information already published in relation to the planning application can be found on the below links:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/planning-application-search/homebase-manor-road>

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/homebase-manor-road-public-hearing>

<https://data.london.gov.uk/dataset/manor-road-public-consultation-documents>

https://www2.richmond.gov.uk/PlanData2/Planning_CASENO.aspx?strCASENO=19/0510/FUL&DocTypeID=7#docs

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely



Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

[REDACTED]

From: planningsupport@london.gov.uk
Sent: 23 July 2019 12:48
To: [REDACTED] Andrew Boff; PCU@communities.gsi.gov.uk; Lucinda Turner; [REDACTED]
[REDACTED]
[REDACTED] ony Arbour
[REDACTED] avisonyoung.com
Subject: GLA 4795 - Homebase Manor Road

Dear [REDACTED]

Site name: Homebase Manor Road

Site Address : 84 Manor Road , North Sheen , TW9 1YB

Local planning authority reference: 19/0510/FUL

GLA case number: 4795

Thank you for your letter of **16 July 2019** informing the Mayor that Richmond upon Thames Council has resolved that it is minded to **refuse** permission for the above planning application.

I hereby give notice that your Stage II referral was received complete on **17 July 2019** and that the fourteen day period allowed to the Mayor will therefore terminate on **30 July 2019**.

If you have any queries at this stage, please contact the case officer [REDACTED] who can be reached by email on [REDACTED]@london.gov.uk or phone 020 7084 [REDACTED]

Kind Regards

[REDACTED]
Development Management
Greater London Authority

[REDACTED]

From: [REDACTED]
Sent: 02 July 2019 10:40
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK)
Subject: Re: Committee Report Addendum Comments | Manor Road

Hi [REDACTED] thanks for these.

I'm afraid nothing on energy yet. I'll follow up.

[REDACTED]

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From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: Tuesday, July 2, 2019 9:26:05 AM
To: [REDACTED]
Cc: [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK)
Subject: FW: Committee Report Addendum Comments | Manor Road

Hi [REDACTED]
For your information, please see our Committee Report Addendum comments issued to LBRUT this morning. In respect of the Manor Circus Contribution, please note that subject to evidence provided that the Manor Circus scheme is not already funded, the Applicant agrees to a contribution that is 15% of the total scheme cost or £330,000 (whichever is the lesser amount).

Many thanks

[REDACTED]

Associate

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From: [REDACTED] (Avison Young - UK)
Sent: 02 July 2019 09:29
To: [REDACTED]
Cc: [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK)
Subject: Committee Report Addendum Comments | Manor Road

Dear [REDACTED]
Please find a letter attached which sets out some points of clarification that we wish to be made as part of the Committee Report Addendum.

I also re-attach the Avison Young Viability Letter dated 24 June / subsequent email, and the Hoare Lea Energy Response referenced in the letter.

If you have any questions about any of the points raised, please do not hesitate to get in touch.

Many thanks

[REDACTED]

Associate

Planning, Development & Regeneration

[REDACTED] avisonyoung.com

Avison Young
65 Gresham Street
London
EC2V 7NQ
United Kingdom

[REDACTED]

From: [REDACTED] [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 26 June 2019 15:56
To: [REDACTED]
Cc: [REDACTED] (Avison Young - UK); [REDACTED] [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK)
Subject: RE: Manor Road - process queries Affordable Housing
Attachments: Affordable Housing Statement_Homebase Manor Road.pdf

Hi [REDACTED]
Having reviewed the Committee Report, we acknowledge that there was not sufficient time for Turleys to review our latest note, issued to you on Monday. Can you please confirm that Stephanie is review this and associated timescales to feed into the Committee Report Addendum?
There are a couple of points in the Committee Report regarding affordable housing which we do not consider reflect the information submitted to date. These include:

Grant Funding (para 48)

The Affordable Housing Scheme (attached) confirms on page three that grant funding does not improve the viability of the scheme to support more affordable housing. This has not been disputed through the Daniel Watney / Turleys responses received to date.

Notwithstanding this, the Applicant has requested further information (email below) regarding the nature of the grant funding pre-commencement review. If this information is provided we can clarify if we are willing to enter into such an obligation.

Registered Providers (para 54)

The Affordable Housing Scheme also sets out engagement with RPs, including an appended letter from Clarion. This should be reflected in the report.

Review Mechanisms (Application Summary and para 330)

The applicant has agreed to early and late stage review mechanisms, subject to agreement in the final wording.

Finally, can you also please advise whether Turley's will be attending/speaking at the Planning Committee on behalf of the Council?

We will be in touch separately regarding any other points of clarification we consider should be addressed in the Committee Report Addendum.

Kind regards

[REDACTED]
Associate

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From: [REDACTED] [REDACTED] (Avison Young - UK)
Sent: 24 June 2019 12:05
To: [REDACTED]
Cc: [REDACTED] (Avison Young - UK); [REDACTED] [REDACTED] (Avison Young - UK)
Subject: RE: Manor Road - process queries

Hi [REDACTED]
In principle, the applicant is willing to agree to the early and late stage review, subject to wording of the agreement.
We do need to understand more about what the review of grant funding review entails - is it a full review pre-commencement or would it be assessing whether any additional grant funding is available at that time (beyond the grant that would be available from the Mayor if we provided 40%)? We have already demonstrated that full Mayoral grant would not improve the viability of the scheme.

Thanks

[REDACTED]
Associate

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From: [REDACTED] [mailto:[REDACTED][richmondandwandsworth.gov.uk](mailto:[REDACTED]@richmondandwandsworth.gov.uk)]
Sent: 24 June 2019 11:57
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK)
Subject: RE: Manor Road - process queries

External Sender

External Sender

Thanks [REDACTED]

I don't think it clarifies your position on the reviews I referred to (it alludes to early and late stage reviews though). Can you please confirm?

We obviously don't have time to update the report with this information or Turley's subsequent response. We can do this through the addendum though.

Regards,

From: [REDACTED] (Avison Young - UK) <[REDACTED][avisonyoung.com](mailto:[REDACTED]@avisonyoung.com)>
Sent: 24 June 2019 11:35
To: [REDACTED] <[REDACTED][richmondandwandsworth.gov.uk](mailto:[REDACTED]@richmondandwandsworth.gov.uk)>
Cc: [REDACTED] (Avison Young - UK) <[REDACTED][avisonyoung.com](mailto:[REDACTED]@avisonyoung.com)>; [REDACTED] (Avison Young - UK) <[REDACTED][avisonyoung.com](mailto:[REDACTED]@avisonyoung.com)>
Subject: RE: Manor Road - process queries

Hi [REDACTED]

Please find attached our response to the Turley's report.

Apologies for any delay.

Kind regards

[REDACTED]
Associate

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From: [REDACTED] [mailto:[REDACTED][richmondandwandsworth.gov.uk](mailto:[REDACTED]@richmondandwandsworth.gov.uk)]
Sent: 24 June 2019 11:06
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK)
Subject: RE: Manor Road - process queries

External Sender

External Sender

Thanks [REDACTED]

I had made the applicant aware of these 3 reviews a while back but I appreciate the final viability position has only just been finalised.

Regards,

From: [REDACTED] (Avison Young - UK) <[REDACTED][avisonyoung.com](mailto:[REDACTED]@avisonyoung.com)>
Sent: 24 June 2019 10:49
To: [REDACTED] <[REDACTED][richmondandwandsworth.gov.uk](mailto:[REDACTED]@richmondandwandsworth.gov.uk)>
Cc: [REDACTED] (Avison Young - UK) <[REDACTED][avisonyoung.com](mailto:[REDACTED]@avisonyoung.com)>; [REDACTED] (Avison Young - UK) <[REDACTED][avisonyoung.com](mailto:[REDACTED]@avisonyoung.com)>
Subject: RE: Manor Road - process queries

Hi [REDACTED]

Our viability consultant is drafting our response this as we speak and it will be with you by 11.30am – as you can appreciate we haven't had long to pull together our response.

Many thanks

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From: [redacted] [mailto:[redacted][richmondandwandsworth.gov.uk](mailto:[redacted]@richmondandwandsworth.gov.uk)]

Sent: 24 June 2019 10:50

To: [redacted] (Avison Young - UK)

Cc: [redacted] (Avison Young - UK)

Subject: RE: Manor Road - process queries

External Sender

External Sender

Hi [redacted]

Can we have a response to this asap please? The report needs to be finalised in the next hour.

Regards,

From: [redacted] (Avison Young - UK) <[redacted][avisonyoung.com](mailto:[redacted]@avisonyoung.com)>

Sent: 21 June 2019 18:45

To: [redacted] <[redacted][richmondandwandsworth.gov.uk](mailto:[redacted]@richmondandwandsworth.gov.uk)>

Cc: [redacted] (Avison Young - UK) <[redacted][avisonyoung.com](mailto:[redacted]@avisonyoung.com)>

Subject: Re: Manor Road - process queries

Thanks [redacted]

I've passed across to the team and we'll get back to you ASAP Monday morning.

Have a great weekend.

Associate

Avison Young

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[redacted]

[\[redacted\]@avisonyoung.com](mailto:[redacted]@avisonyoung.com) | www.avisonyoung.co.uk

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On 21 Jun 2019, at 17:19, [redacted] <[redacted][richmondandwandsworth.gov.uk](mailto:[redacted]@richmondandwandsworth.gov.uk)> wrote:

External Sender

External Sender

Please see final viability review report.

Can you please confirm whether you accept the 3 AH reviews I referred to. We need a response by 11am on Monday for the report.

Regards,

From: [redacted] (Avison Young - UK) <[redacted][avisonyoung.com](mailto:[redacted]@avisonyoung.com)>

Sent: 19 June 2019 15:51

To: [redacted] <[redacted][richmondandwandsworth.gov.uk](mailto:[redacted]@richmondandwandsworth.gov.uk)>

Cc: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Subject: RE: Manor Road - process queries

Hi [REDACTED]

Thanks for confirming.

Are you able to send me the relevant contact details for your colleague in the Housing Team so that [REDACTED] can liaise with them directly? This will hopefully enable us to resolve the queries quicker.

I will aim to send you responses to the other queries asap.

Kind regards,

[REDACTED]
[REDACTED]

Principal Planner

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From: [REDACTED] [mailto:[REDACTED]@richmondandwandsworth.gov.uk]

Sent: 19 June 2019 15:54

To: [REDACTED] (Avison Young - UK)

Cc: [REDACTED] (Avison Young - UK)

Subject: RE: Manor Road - process queries

External Sender

External Sender

Hi [REDACTED]

I'm working at home today. I'm just finalising the report. I think we have everything bar the points you mentioned. I will email this afternoon if there is anything else.

[REDACTED] is reviewing my report tomorrow so I will need confirmation of these points by the end of the day.

Regards,

[REDACTED]

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Sent: 19 June 2019 15:46

To: [REDACTED] <[REDACTED]@richmondandwandsworth.gov.uk>

Cc: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Subject: Manor Road - process queries

Hi [REDACTED]

I tried to call but unfortunately couldn't get through. I just wanted to check that apart from the few outstanding email queries (landscape sqm, confirmation of CPZ contribution, affordable review mechanisms), that you have everything you need to finish your report?

What is the process for your report – does it need to go to [REDACTED] for sign off and when will be able to see a copy?

Could you confirm that the application will be heard at the 3rd July Planning Committee please?

Kind regards,

[REDACTED]
[REDACTED]

Principal Planner

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Our Ref: CF01/02B825164
Your Ref: Manor Road

24 June 2019

Avanton Richmond Developments Ltd
56 Queen Anne Street
London
W1G 8LA

For the attention of [REDACTED] Esq.

Dear Sirs

Manor Road, Richmond – Viability Response

We have reviewed the latest viability response prepared by Turley's in relation to the above.

Turley's have reported a revised benchmark land value for the proposed scheme of £26.6 million compared to our position of £31.75 million.

The difference in value alongside their continued removal of the developer's contingency has resulted in a reported affordable housing position of 41% affordable housing split 36:64 between LAR and SO tenure. We maintain that it is not viable for the scheme to support this level of affordable housing.

We have reviewed Turley's rationale and whilst we take on board some of the commentary in relation to existing rental value, we do not agree with the commentary regarding the trading positions on this site, the valuation approach or the eventual benchmark land value position.

Given the current climate for retail rents, for the purpose of advancing discussions in the short timescales available, as we have been asked to respond today, we are willing to adopt the rent put forward by Turley's at £25 per sq ft. However, we do not accept the comments regarding the trading conditions of this store. It is a well performing store and the tenant would not be vacating were it not for the redevelopment plans. You have advised that the tenant wishes to retain this site.

Furthermore, we do not however accept that applying an arbitrary 20% uplift premium as the appropriate method to assess any plus. Planning policy requires that this must have regard to other evidence in the market and be arrived at through 'an iterative process informed by professional judgment and must be based upon the best available evidence informed by cross sector collaboration.' (Viability PPG).

The subject property is well located within the London Borough of Richmond, it is recognised as a site with significant development potential and therefore it is clear that the site would not be released without a

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considerable premium. Turley have referenced a number of transactions of similar sites and the values have been well in excess of the value we have assessed. Our assessment has taken an iterative approach recognising the need to adjust transactional evidence to ensure that affordable housing is not priced out, but also acknowledging that sites will not come forward for development at artificially constrained land values. The GLA SPG recognises that the premium above existing use may range between 10% and 30%, but this is only a guide and can be more or less. Given the prime location of this site in an accessible location within the affluent Borough of Richmond, it is to be expected that a premium towards to upper end of this range or potentially over it, would be justified and we have sought to demonstrate this with regard to market evidence. We consider the sale of the Homebase to Barratt's in our initial report as the main comparable in this respect. The yield adopted in this case was 3% and the scheme was policy compliant with regard to GLA requirements. Therefore we consider that our adjusted yield of 3.75% reflects an extremely reasonable approach and arguably this could be lower.

Taking £25 per sq ft rent and maintaining a yield of 3.75% results in a benchmark land value of £28 million, which we are willing to adopt on a without prejudice basis to progress discussions. Had we adopted 3% based on the policy compliant comparable, the benchmark would be £35 million. Overall a position of between £28 million and £31.75 million seems reasonable.

With regard to the Developer's Contingency, the approach here seems contradictory. The comment is made that Developer's Contingency is 'whittled away' over the course of the development. This is not disputed, however, the viability assessment has to be undertaken reflecting the position today and at this stage in scheme development there are risks and unknown costs that mean a developer's contingency is an essential requirement. This would be a requirement for any bank lending and is set out in RICS Guidance as an allowance both developers and contractors would require. Indeed both contingencies are entirely separate sums for different purposes – one as a contingency for a contractor, the other for a developer. This is fully explained in the RICS guidance attached.

We note that an allowance for additional contingency for ground works has been made but this is only one area of potential risk. It is necessary to make further allowance and of course if this is not required this would be picked up in any late stage review.

Adopting a revised BLV of circa £29 million, towards the lower end of the reasonable position, results in an outturn affordable position which, given the time available to consider the latest letter from Turley's, continues to support our current affordable housing offer of 35% affordable housing. We are aware that this would be subject to an early and late stage review and final assessment prior to implementation to confirm the grant position at that time, which we would be happy to discuss with you at an appropriate stage.

Yours faithfully

Director

@avisonyoung.com

For and on behalf of
GVA Grimley Limited t/a Avison Young

Senior Director/Principal

@avisonyoung.com

For and on behalf of GVA Grimley t/a Avison Young.

2.15 Measurement rules for risk

- 2.15.1** All building projects involve risks; some obvious, some less so. The proper management of risk saves time and money. Risks can occur at any point in a building project and it is essential that they are identified, assessed, monitored and controlled.
- 2.15.2** Risk exposure (i.e. the potential effect of risk) changes as the building project progresses; continually managing the risks is therefore essential. As the design evolves, more of the project requirements are defined, and a risk response can be decided. For example:
- (a) **Risk avoidance:** where risks have such serious consequences on the project outcome that they are totally unacceptable. Risk avoidance measures might include a review of the employer's brief and a reappraisal of the project, perhaps leading to an alternative development mix, alternative design solution or its cancellation.
 - (b) **Risk reduction:** where the level of risk is unacceptable. Typical action to reduce risk can take the form of:
 - (i) Redesign: combined with improved value engineering.
 - (ii) More detailed design or further site investigation: to improve the information on which cost estimates and programmes are based.
 - (iii) Different materials or engineering services: to avoid new technology or unproven systems or long delivery items.
 - (iv) Different methods of construction: to avoid inherently risky construction techniques.
 - (v) Changing the project execution plan: to package the work content differently, or to carry out enabling works.
 - (vi) Changing the contract strategy: to allocate risk between the project participants in a different way.
 - (c) **Risk transfer:** where accepting the risk would not give the employer best value for money. The object of transferring risk is to pass the responsibility to another party able to better control the risk. Whenever risk is transferred there is usually a premium to be paid (i.e. the receiving party's valuation of the cost of the risk). To be worthwhile, risk transfer should give better overall value for money to the employer (the total cost of the risk to the employer is reduced by more than the cost of the risk premium). Risk transfer measures include taking out insurance cover where appropriate.
 - (d) **Risk sharing:** occurs when risk is not entirely transferred and the employer retains some element of risk.
 - (e) **Risk retention:** risks retained by the employer that are not necessarily controllable. This remaining risk is called the residual risk exposure.
- 2.15.3** Considering the limited information about the building project and site conditions, the risk allowance at the RIBA Preparation Work Stage (i.e. A: Appraisal and B: Design Brief) and the OGC Business Justification and Delivery Strategy Gateways can be a significant percentage of the total estimated cost; whereas, after completion (when all accounts are settled) the requirement for a risk allowance will be zero. Proper risk identification, assessment, monitoring and control are therefore a prerequisite of realistic cost estimates and of minimising the consequential costs arising from the employer's residual risk exposure.
- 2.15.4** It is recommended that risk allowances are not a standard percentage, but a properly considered assessment of the risk, taking into account the completeness of the design and other uncertainties such as the amount of site investigation done.
- 2.15.5** It is recommended that separate allowances be made for each of the following:
- (a) **Design development risks** – an allowance for use during the design process to provide for the risks associated with design development, changes in estimating data, third party risks (e.g. planning requirements, legal agreements, covenants, environmental issues and pressure groups), statutory requirements, procurement methodology and delays in tendering.

- (b) **Construction risks** – an allowance for use during the construction process to provide for the risks associated with site conditions (e.g. access restrictions/limitations, existing buildings, boundaries, and existing occupants and users), ground conditions, existing services and delays by statutory undertakers.
- (c) **Employer change risks** – an allowance for use during both the design process and the construction process to provide for the risks of employer driven changes (e.g. changes in scope of works or brief, changes in quality and changes in time).
- (d) **Employer other risks** – an allowance for other employer risks (e.g. early handover, postponement, acceleration, availability of funds, liquidated damages or premiums on other contracts due to late provision of accommodation, unconventional tender action and special contract arrangements).

2.15.6 Lists of typical risks for each category of risk are at Part 4: Tabulated rules of measurement for elemental cost planning (group element 13: Risks). These lists are not meant to be definitive or exhaustive, but are simply a guide.

2.15.7 Risk allowances are to be included in the order of cost estimates. Even at the RIBA Preparation Work Stage and the OGC Business Justification and Delivery Strategy Gateways, it is recommended that the size of the initial risk allowance is based on the results of a formal risk analysis. If the risk characteristics are not acceptable to the employer, it is advisable that the risk allowance is not determined until management action has been taken to review the employer's risk exposure and to identify suitable risk responses that will reduce this exposure to an acceptable level. It is recommended that a revised risk analysis is undertaken to determine the most likely out-turn cost and the risk allowance.

2.15.8 Throughout the RIBA Preparation Work Stage and the OGC Business Justification and Delivery Strategy Gateways of a building project, it is advisable that effort is concentrated upon the main sources of risk. It may be beneficial, even at this stage of the project, to prepare a project specific risk register incorporating the major risks identified and a risk management strategy. It is recommended that risks are not excluded without due consideration. Take care not to allow the natural optimism which surrounds the early stages of a building project to influence the realism of judgments which are to be made.

2.15.9 The risks, which can influence the cost of a project, change as the building project progresses through the subsequent RIBA Work Stages. It is recommended that risk registers and risk estimates are reassessed at regular intervals throughout the various formal stages of cost planning which follow once the cost limit has been authorised by the employer.

2.15.10 For the purpose of order of cost estimates, risk allowances for design development risks, construction risks and employer's risks based on the application of percentage additions are to be calculated by multiplying the base cost estimate by the selected percentage additions. The equation for calculating the risk allowances for design development risk, construction risk and employer's risk are therefore:

for design development risks: $R1 = a \times p1$

for construction risks: $R2 = a \times p2$

for employer change risks: $R3 = a \times p3$

for employer other risks: $R4 = a \times p4$

where:

a = base cost estimate

$p1$ = percentage risk allowance for design development risks

$p2$ = percentage risk allowance for construction risks

$p3$ = percentage risk allowance for employer change risks

$p4$ = percentage risk allowance for employer other risks

Group element 13: Risks

Group element 13 comprises the following elements:

13.1 Design development risks

13.2 Construction risks

13.3 Employer change risks

13.4 Employer other risks

Note: Typical causes of risks that should be considered under these elements are listed in the tables below. The risks that might arise from these causes can then be identified and the cost implications to the project should any of the risks materialise be estimated (i.e. the risk allowance required to manage and resolve the each risk should it materialise). The lists are not meant to be definitive or exhaustive, but are merely a guide. The lists can be used to prompt the employer and other project team members.

Element 13.1: Design development risks

- 1 Inadequate or unclear project brief.
- 2 Unclear design team responsibilities.
- 3 Unrealistic design programme.
- 4 Ineffective quality control procedures.
- 5 Inadequate site investigation.
- 6 Planning constraints/requirements.
- 7 Soundness of design data.
- 8 Appropriateness of design (constructionability).
- 9 Degree of novelty (i.e. design novelty).
- 10 Ineffective design co-ordination.
- 11 Reliability of area schedules.
- 12 Reliability of estimating data:
 - changes in labour, materials, equipment and plant costs; and
 - inflation (i.e. differential inflation due to market factors and/or timing).
- 13 Use of provisional sums (i.e. do not give price certainty).

Element 13.2: Construction risks

- 1 Inadequate site investigation.
- 2 Archaeological remains.
- 3 Underground obstructions.
- 4 Contaminated ground.
- 5 Adjacent structures (i.e. requiring special precautions).
- 6 Geotechnical problems (e.g. mining and subsidence).
- 7 Ground water.
- 8 Asbestos and other hazardous materials.
- 9 Invasive plant growth.
- 10 Tree preservation orders.
- 11 Ecological issues (e.g. presence of endangered species).
- 12 Environmental impact.
- 13 Physical access to site (i.e. restrictions and limitations).
- 14 Existing occupancies/users.
- 15 Restricted working hours/routines.

16	Maintaining access.
17	Maintaining existing services.
18	Additional infrastructure.
19	Existing services (i.e. availability, capacity, condition and location).
20	Location of existing services.
21	Relocation of existing services.
22	Statutory undertakers (i.e. performance).
23	Uncertainty over the source and availability of materials.
24	Appropriateness of specifications.
25	Incomplete design.
26	Weather and seasonal implications.
27	Industrial relations.
28	Remote site.
29	Competence of contractor and subcontractors.
30	Health and safety.
31	Ineffective quality management procedures.
32	Phasing requirements (e.g. occupation and decanting).
33	Ineffective handover procedures.
34	Disputes and claims.
35	Effect of changes/variations on construction programme.
36	Cumulative effect of numerous changes/variations on construction programme.
37	Defects.
38	Accidents/injury.

Element 13.3: Employer change risks

1	Specific changes in requirements (i.e. in scope of works or project brief during design, pre-construction and construction stages).
2	Changes in quality (i.e. specification of materials and workmanship).
3	Changes in time.
4	Employer driven changes/variations introduced during the construction stage.
5	Effect on construction duration (i.e. impact on date for completion).
6	Cumulative effect of numerous changes.

Element 13.4: Employer other risks

1 Project brief:

- End user requirements.
- Inadequate or unclear project brief.
- Employer's specific requirements (e.g. functional standards, site or establishment rules and regulations, and standing orders).

2 Timescales:

- Unrealistic design and construction programmes.
- Unrealistic tender period(s).
- Insufficient time allowed for tender evaluation.
- Contractual claims.
- Effects of phased completion requirements (e.g. sectional completion).
- Acceleration of construction works.
- Effects of early handover requirements (e.g. requesting partial possession).
- Postponement of pre-construction services or construction works.
- Timescales for decision making.

3 Financial:

- Availability of funds.
- Unavailability of grants/grant refusal.
- Cash flow effects on timing.
- Existing liabilities (i.e. liquidated damages or premiums on other contracts due to late provision of accommodation).
- Changing inflation.
- Changing interest rates.
- Changing exchange rates.
- Changes in taxation (e.g. VAT).
- Unsuitable contract strategy.
- Incomplete design before construction commences.
- Unconventional contract strategy.
- Unconventional tender action.
- Amendments to standard contract conditions and/or supplementary contract conditions.
- Acceptance of use of provisional sums (i.e. do not give price certainty).
- Liquidation/insolvency of main contractor.
- Liquidation/insolvency of consultant.
- Delay in payment.

4 Management:

- Unclear project organisation and management.
- Competence of project/design team.
- Unclear definition of project/team responsibilities.
- Inadequate or no risk management strategy
- Ineffective or no cost control procedures.
- Inadequate or no design review procedures.
- Ineffective or no procedures for procurement
- Ineffective or no time control procedures.
- Ineffective change control procedures (for both pre-construction and construction stages of building project).
- Ineffective reporting systems.
- Phasing of decanting and occupation.

5 Third party:

- Requirements relating to planning (e.g. public enquiries, listed building consent and conservation area consent).
- Opposition by local councillor(s).
- Planning refusal.
- Legal agreements.
- Works arising out of party wall agreements.
- Requirements relating to existing rights of way, rights of light, way leaves and noise abatement.
- Requirements relating to listed buildings and/or conservation areas.
- Requirements relating to sites of scientific interest (SSI).
- Requirements relating to environmental impact assessments.
- Requirements relating to social matters (e.g. pressure groups and local protests).
- Public enquiries.

6 Other:

- Insistence on use of local work people.
- Availability of labour, materials and plant.
- Statutory requirements.
- Market conditions.
- Political change.
- Legislation.
- Force majeure.

2 July 2019

[REDACTED]
[REDACTED]
London Borough Richmond Upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Dear [REDACTED]

**Planning application for full planning permission – Homebase Manor Road,
North Sheen, Richmond, TW9 1YB (reference 19/0510/FUL)**

We write with reference to the Planning Committee Report for application reference 19/0510/FUL. The application is due to be heard at Planning Committee on 3rd July 2019.

Following a review of the Committee Report, we have noted some minor factual errors and would be grateful if you could clarify the following corrections in a Committee Report Addendum:

- The summary of the application (page 3) should refer to 134 affordable homes, not 135.
- The summary of the application (page 3) and paragraph 4 state that the Bus Terminus is to the north of the site. The Terminus is within the site.
- Paragraph 48 – the Affordable Housing Scheme confirms that grant funding does not improve the viability of the scheme to support more affordable housing. This has not been disputed through the Daniel Watney / Turleys responses received to date. Further discussions are ongoing with Turleys regarding the impact of grant funding, and we hope to resolve this outstanding point prior to Planning Committee.
- The Applicant has requested further information from LRBUT regarding the nature of the proposed S106 obligations to review grant funding via a pre-commencement review. No clarification on this obligation has been received from LBRUT to date.
- Paragraph 54 - the Affordable Housing Scheme also sets out engagement with RPs, including an appended letter from Clarion. This should be reflected in the report.
- Paragraph 126 – there is a suggestion that the Council's independent daylight advisor did not have sufficient information in which to review the internal daylight for the scheme itself. Confirmation on the internal daylight assessment and ADF parameters were provided to LBRUT in Point 2's letter dated 10th

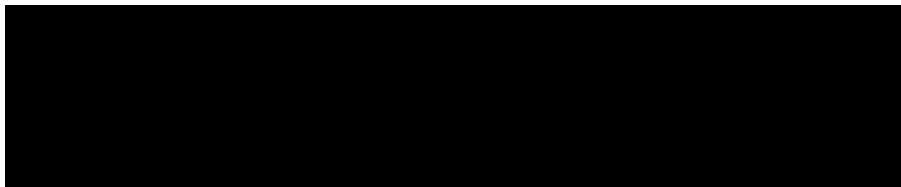
June. This was as a result of the direct request made by the Council's independent advisor – their letter dated 31st May – received by Point 2 on the 3rd June.

- Paragraph 127 – the report says “it is clear that, even when based on the applicant's daylight assessment, a significant number of habitable rooms will be affected by poor levels of natural light”. This is a disconnect from the committee report which confirms that the daylight results equate to a compliance rate of 93% - Paragraph 126 (a).
- Paragraph 132 – the child yield is 86, not 68.
- Paragraph 167 – the report says “The review has indicated that the proposal was largely assessed correctly in accordance with the BRE guidelines”. This is incorrect as all assessments undertaken by Point 2 have been undertaken in accordance with BRE and their methodology.
- Paragraph 173 – the report suggests that an additional contextual assessment be undertaken to establish whether the daylight levels are comparable with other residential typologies within the area. This was not something which the local authority raised during the initial discussions and/or the scope of the various assessments. The conclusions reached by Point 2 confirm that the retained daylight values are good to very good. This point was covered in the Point 2 letter dated 10th June.
- Paragraph 233 – drawing P11559-00-001-400-01 (Typical Tree Pit Details) was revised and sent to the LPA on 17th June 2019. The detail ‘Tree pit over slab’ allows for 1200mm soil depth for the tree pit. That is adequate for healthy tree growth and is in line with the best practice. 600mm soil depth is allowed for shrub and herbaceous planting therefore the void is used under them to maintain consistent levels between tree pit and surrounding planting.
- Paragraph 249 – there are 972 cycle parking spaces, not 948. The difference between these numbers seems to be the 24 spaces in the public realm visitors. There are 764 basement cycle parking spaces, 120 at ground floor level in Block C, 64 at ground floor level in Block D and 24 spaces in the public realm for visitors.
- Paragraph 254 – a detailed assessment has been undertaken in relation to potential mode share and we firmly believe that using census data leads to exaggerated public transport levels. We do not consider the use of “Census Travel to Work Data” to be representative of the proposed development and that the TRICS data which relates to all journey purposes is more appropriate.
- Paragraph 255 – further information regarding this was provided in the TA Addendum and should be referred to here.
- Paragraphs 276 and 281 – the crossing referred to in these paragraphs is not 0.8m wide. From our calculations and observations, the crossing is approximately 1.5m wide with a refuge of 1.8m long (i.e. between the islands). This meets the design standards in the Design Manual for Roads and Bridges.
- Paragraph 286 and 301 – TfL has reviewed the Manor Circus contribution and is now requesting a revised amount of £330,000 (reduced from £420,000). TfL previously requested £420,000 on the basis that this equated to 15% of the total scheme cost. As the cost of the scheme has reduced, 15% of the total scheme cost now equates to £330,000. On this basis, and subject to evidence provided that the scheme is not already funded, the Applicant agrees to a contribution that is 15% of the total scheme cost or £330,000 (whichever is the lesser amount).
- Paragraph 330 and summary – the applicant has agreed to early and late stage review mechanisms, subject to agreement in the final wording.

We would be grateful if you could clarify these changes in a Committee Report Addendum.

As you are aware, we have sent separate responses to the GLA Energy comments (26th June) and Turley's comments on viability (24th June) by separate cover which should also be reflected in the Committee Report Addendum. These are re-attached to this letter for further information.

Yours sincerely



██████████

Associate

0207 ██████████

██████████ [avisonyoung.com](https://www.avisonyoung.com)

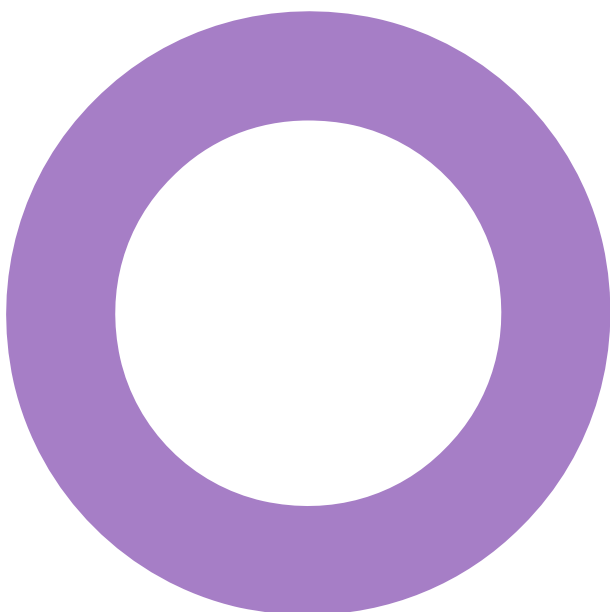
For and on behalf of GVA Grimley Limited t/a Avison Young

**Manor Road.
Richmond.**
**Avanton Richmond
Development Ltd.**

ENERGY STRATEGY

RESPONSE TO ADDITIONAL GLA COMMENTS

REVISION 01 – 26 JUNE 2019



Audit sheet.

Rev.	Date	Description of change / purpose of issue	Prepared	Reviewed	Authorised
01	26/06/2019	Issued for information	██████	Design team	██████

This document has been prepared for Avanton Richmond Development Ltd only and solely for the purposes expressly defined herein. We owe no duty of care to any third parties in respect of its content. Therefore, unless expressly agreed by us in signed writing, we hereby exclude all liability to third parties, including liability for negligence, save only for liabilities that cannot be so excluded by operation of applicable law. The consequences of climate change and the effects of future changes in climatic conditions cannot be accurately predicted. This report has been based solely on the specific design assumptions and criteria stated herein.

Project number: 23/23145

Document reference: REP-2323145-5A-LFW-20190626-Response to updated GLA comments-Rev 01

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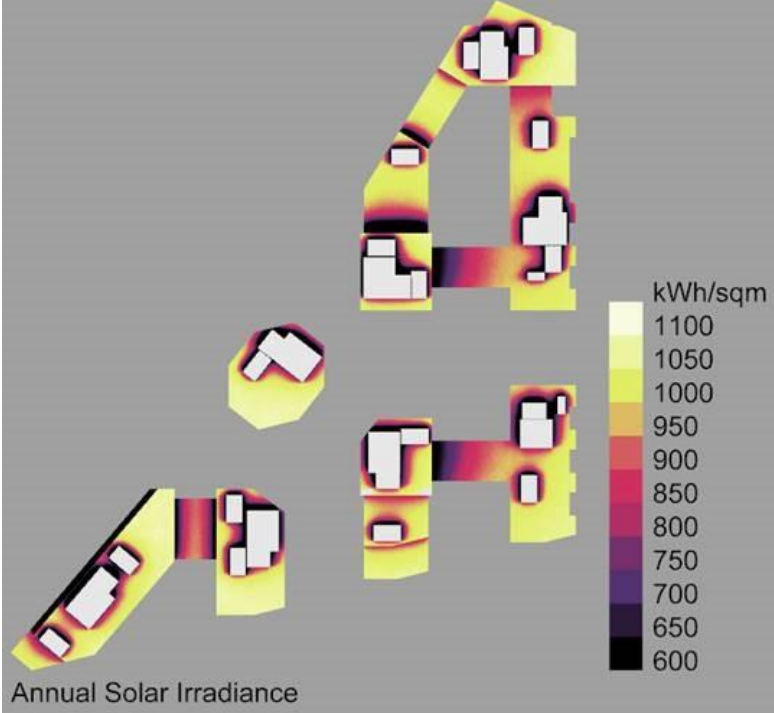
Executive summary

This document provides a response to the second round of comments provided by the Greater London Authorities (GLA) on 17/06/2019 to the Energy Strategy prepared by Hoare Lea in support of the planning application for Manor Road, Richmond (case number 4795).

Item #	Query	Team response
6	They should be conditioned to investigate further possible improvements to the thermal bridging prior to the commencement of work on site, with the aim of achieving the Be Lean 10% reduction on Part L 2013 from energy efficiency measures alone.	The developer confirms they will commit to investigate this further.
16	GLA policy requires the assessment of overheating using the DSY 2 & 3 weather files; the applicant should submit the results.	The assessment was carried out in line with the TM59 methodology, section 2.2-11 of which states that the assessment should be carried out using the DSY1 2020, high emissions, 50% scenario weather file. In line with the same methodology, as the development is not situated in the central London heat island, and as it is not expected that there will be a concentration of vulnerable occupants, it is considered that the weather file used is already a good assessment of overheating risk without the need to test further weather files.
19	The applicant should clarify their statement that the DSY 1 assumed external temperature "effectively precludes the use of mechanical ventilation as a design solution to mitigate overheating risk, since whatever the amount of mechanical supply air, and / or passive design measures, internal temperatures will exceed the 3% threshold due to unavoidable heat gains".	<p>External ambient temperatures in the London DSY1 exceed 26oC by 2.7% of annual hours, leaving very little margin (0.3%) to the maximum allowed 3% of annual hours exceedance. This is the weather file alone, prior to adding any internal heat gains. Once internal heat gains are added (cooking, lighting, people etc) the rooms will therefore be expected to exceed the threshold.</p> <p>Mechanical ventilation without cooling would be circulating hot air through the apartment, but would not be able to dissipate the high temperatures arising from a combination of the weather file, and the unavoidable internal gains.</p>
21	The applicant has confirmed they have contacted the Borough of Richmond Upon Thames, but are yet to receive a response. They should submit the response when it is received.	<p>Comments have been received from the council. Summary provided below, and full comments attached in Appendix A. The comments support the applicant's approach.</p> <p><i>"After review of the available evidence CIS has concluded that there are no upcoming schemes in the vicinity of the proposed development. However, the nature of the surrounding plots makes it reasonably likely that currently unforeseen DHN's will be developed in the area within the building lifetime, therefore in line with the Greater London Authority guidance on preparing energy assessments basic futureproofing should be provided, including providing space in plantrooms for heat exchangers and leaving a likely path for connecting pipes as clear as possible. "</i></p>

Item #	Query	Team response
23	<p>(...) providing a site-wide network is a strategic policy to encourage future connection to district heating, with future connection expected to provide wider benefits over the lifetime of the development. In our experience, other applicants proposing similar schemes are able to provide a site-wide network whilst minimising operational costs. The applicant should consider the benefit of increased demand diversity, when providing a site-wide network, which may allow plant sizes to reduce.</p>	<p>While we appreciate the benefits a potential future district energy network could pose, it remains the applicant's stance that the specific site constraints at Manor Road, and the fact there are no planned future networks in the vicinity of the site makes this theoretical future connection highly unlikely.</p> <p>Further, due to the ongoing decarbonisation of the grid, it is expected that the proposed ASHP strategy will continue to become ever more efficient in terms of carbon emission reductions as time passes, and therefore we find it unlikely that any potential future district energy network would provide carbon savings compared to the proposed strategy, especially when taking distribution losses into account.</p> <p>The strategy that has been put forward to enable potential future connection is deemed by the applicant to be a reasonable compromise (a space allowance for a future potential heat exchanger at the ground floor of each block, so that a connection can be made in future, should a low carbon network become available, albeit this would require some ground work to extend the district connection from the site boundary to each block).</p> <p>Circulating hot water in pipework around the site would lead to an increase in carbon emissions for the site due to heat losses in the pipework. We would be very interested to see what calculations other applicants have put forward to confirm their schemes are able to minimise operational cost whilst accounting for estimated 'real' distribution losses (i.e. not the SAP default 5% losses).</p> <p>Our calculations suggest that 25% distribution loss is expected in the building-by-building scenario, while a 50% distribution loss would be expected in the site-wide scenario. That is assuming standing losses for 22 hours out of every day (arguably could be even higher if losses are assumed 24h/day). Losses were estimated using industry standards for W/m heat loss, with a reduction to account for the reduced distribution temperature of the system.</p> <p>Options for allocating central plant was reviewed during design, however this made limited impact on the diversity when utilising DS439 methodology. The difference equated to approximately 11% reduction in overall ASHP capacity, which does not result in a significant overall space saving, and when coupled with other plant siting considerations (acoustics, architectural massing, views) the decentralised approach was deemed most appropriate. There is also very limited efficiency benefit from centralising ASHP and providing fewer, larger units. On the contrary, a greater number of smaller units will allow the site management to match the load more accurately to the demand.</p>

Item #	Query	Team response			
		Strategy	Carbon Emissions (based on SAP 10)	Carbon Offset Payment	Resident Fuel Cost Difference
		Air Source Heat Pumps building by building	35% reduction	£450,000 (residential areas) + £10,800 (potential, retail areas)	Baseline: 2.2 p/kWh (incl. RHI) 4.8 p/kWh (excl. RHI)
		Air Source Heat Pumps with site-wide connection	23% reduction (i.e. 12% less CO ₂ emission reductions compared to the building-by-building design)	+ additional £83,000 (estimated an additional ~46 tonnes CO ₂ /year would be emitted by the development)	+0.40 p/kWh (incl. RHI) +1.2 p/kWh (excl. RHI)
28b	The applicant should confirm the SEER assumed for cooling, and whether the SCOP accounts for the proposed cooling.	An SEER of 6.5 has been assumed for cooling. The SCOP did not assume simultaneous heating and cooling, so potential to recover waste heat was not used in modelling, however this will be investigated during developed design.			
28c	The applicant has provided a datasheet confirming their assumptions, including the run-time and external temperature as per item b. (...) They should confirm the proposed size of the heat pumps.	Approximately 2.8MW of ASHP heating is provided across the site in module sizes varying from 90-250kW.			
28e	A commitment to monitor the performance of the heat pump system post-construction to ensure it is achieving the expected performance approved during planning.	The client has confirmed they will commit to monitoring the performance of the heat pump system post-construction and compare against the expected performance estimated during planning. Suitable commissioning will be carried out of the system to ensure optimised performance.			
29	Solar PV and roof space availability: the applicant should provide further detail and provide solar insolation levels.	A solar irradiance study of the roofs has been completed – see image below. Due to some updates in the allocation of plant space, it would be prudent to move two of the arrays, however the over-all estimated allocation is unchanged (140m ² of PV panel area). See updated mark-up attached. Grey areas in the attached are allocated for			

Item #	Query	Team response
		<p>mechanical plant space or overshadowed areas, red areas are areas that are deemed too small for a PV array (less than 15 panels would fit).</p> <p>Further PV allocation is not deemed suitable for the following reasons:</p> <ul style="list-style-type: none"> - All remaining unshaded locations would only allow for small arrays (<15 panels each). - Such small arrays would have a negligible impact on the carbon emission reductions for the development - Small PV arrays are less efficient due to inverter losses (each array would need a separate inverter) - The development is already expected to achieve in excess of 35% carbon emission reductions based on the current design. 
32	The applicant has confirmed that they have currently omitted the CO ₂ emissions reduction associated with PV. Once all other comments are resolved, they should provide updated CO ₂ emissions reductions for all stages of the energy hierarchy, including the CO ₂ emissions from PV.	To clarify: We have not omitted the carbon emission reductions from our calculations, however they are not included in the SAP calculations for the apartments at the current point in time, but were added to the calculations separately. Updated CO ₂ emission reductions at each stage of the energy hierarchy are set out in the Appendix E. This includes the additional PV array identified by the team in the previous response (i.e. total array now 140 m ² PV panel area).

Item #	Query	Team response
34	The applicant has confirmed that the carbon offset payment is expected to be fixed as part of the S106 negotiations. The borough has confirmed that they are happy with the approach but will have to check the figures once the energy assessment is finalised. If the outstanding comments result in further changes to the CO ₂ emissions and carbon offset payment, the applicant should provide correspondence from the borough confirming the figure has been agreed.	The team will continue to review any amendments to the value of the carbon offset payment once the energy assessment has been finalised. The final figure will be agreed with relevant parties.

Appendix A – Correspondence with LBRuT regarding local district heating networks

District Heating Network Review.

Site Name:	84 Manor Road TW9 1YB
Planning reference number:	2018/5833
Consultant:	
Comments provided on:	17/06/19

Details:

For the proposed development at the applicant has carried out an investigation and found that there are no existing or planned district heat networks within the vicinity of the proposed development. They have been asked to contact the borough to see if they were aware of any upcoming schemes, the council have then forwarded this search to Climate Integrated Solutions (CIS).

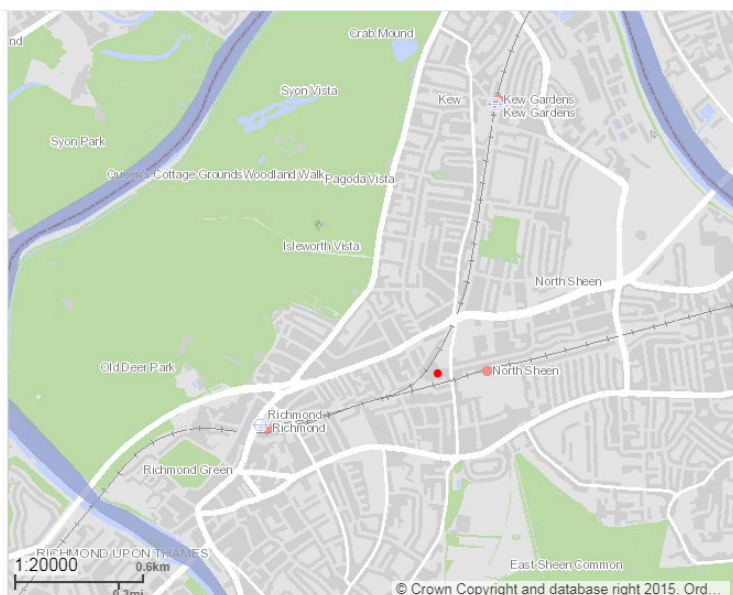
Summary:

After review of the available evidence CIS has concluded that there are no upcoming schemes in the vicinity of the proposed development.

However the nature of the surrounding plots makes it reasonably likely that currently unforeseen DHN's will be developed in the area within the building lifetime, therefore in line with *the Greater London Authority guidance on preparing energy assessments* basic futureproofing should be provided, including providing space in plantrooms for heat exchangers and leaving a likely path for connecting pipes as clear as possible.

Evidence Review:**Heatmap:**

The image below taken from the London.gov.uk London Heat Map which, whilst not 100% reliable, includes most current and proposed District Heat Networks shows nothing within a practical distance of the site marked in red.



District Heating Network Review.

ADE:

The Association for Decentred Energy also maintain a nationwide map which includes some London projects not present on the Heat Map. The closest DHN to the site marked in red on this map is over a kilometre away making it impractical even without crossing The Thames and Kew Gardens.



Planning searches.

Searches have been conducted for any applications to the Richmond Council or Mayor of London and none relating to District Heating in the area have been found.

Word of mouth search.

CIS has also reached out to various of its numerous contacts within the planning and heating industries. In each case we have been told that they do not know of any networks being discussed near the site.

Conclusion





After conducting all reasonable checks and diligently searching CIS is able to concur with the applicant that there appear to be no current or upcoming District Heat Networks in the vicinity of the site.

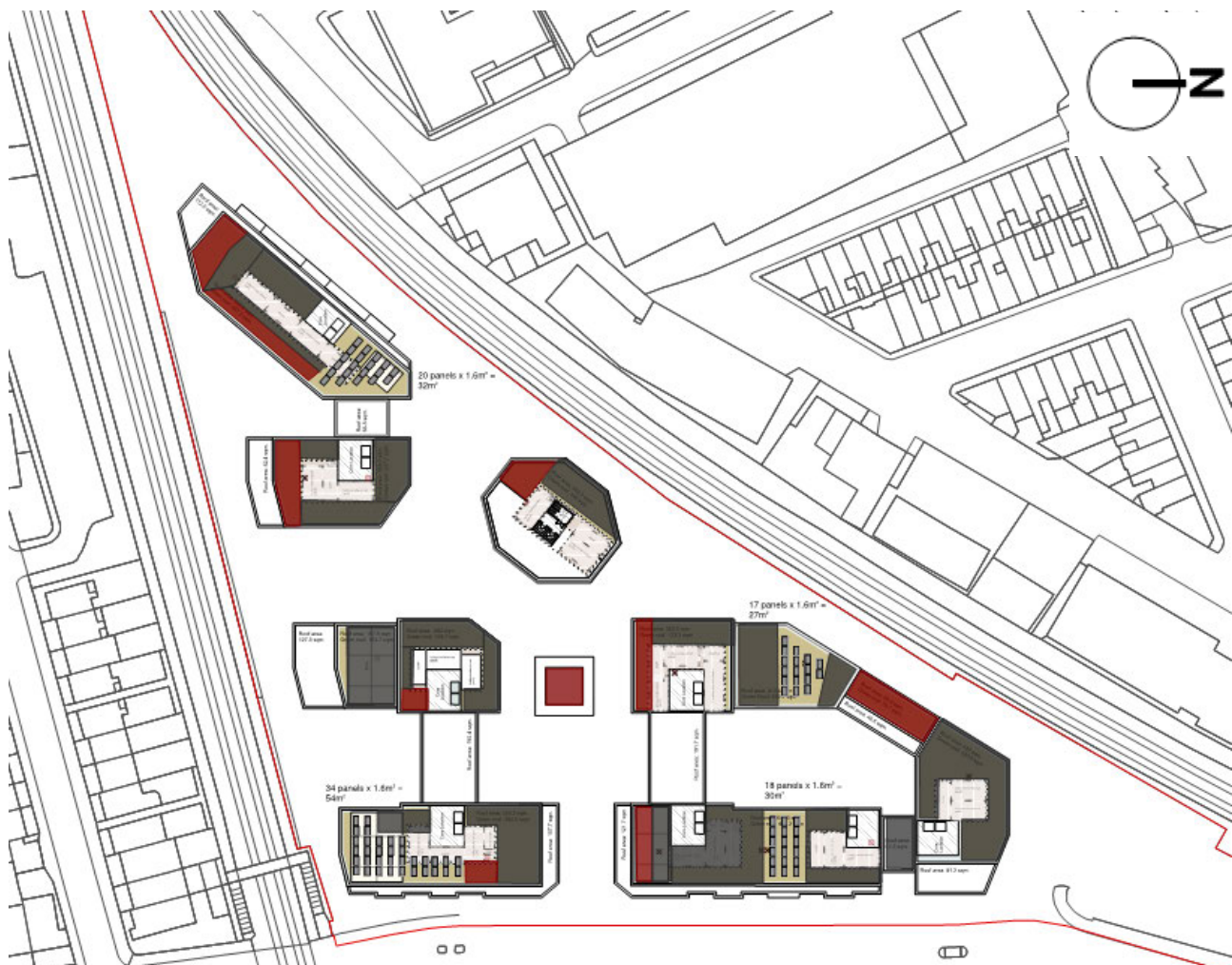
It should be noted however that the vicinity include a wide range of uses including large and small domestic blocks, large retail, transport and recreation, it should not therefor be assumed that there will not be a DHN within practical reach during the lifetime of the building so GLA Energy Planning guidance of basic futureproofing for this applies.

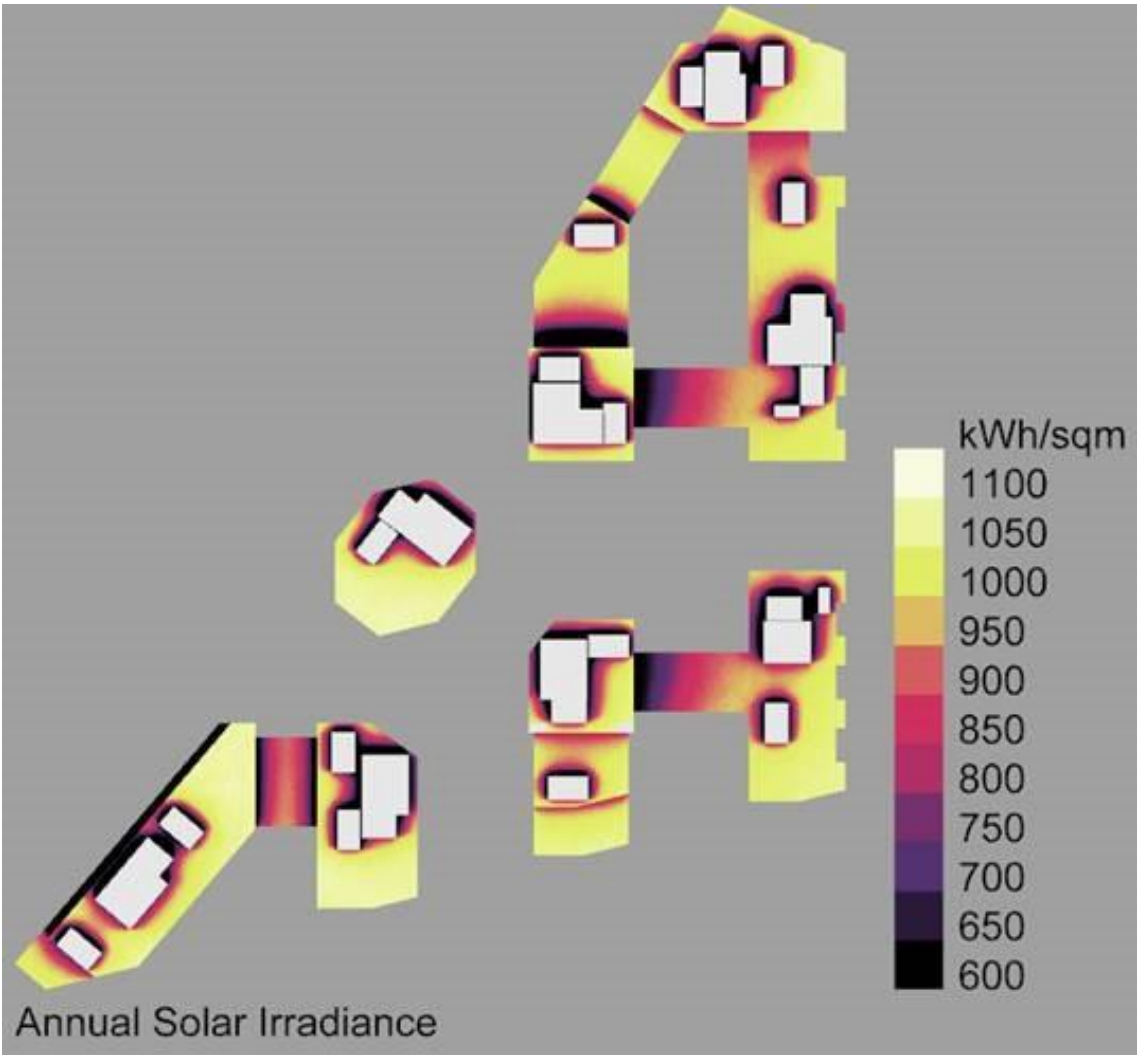
Appendix B – PV array sizing

The roof layout has been detailed further since the planning application, and plant allocations have changed slightly. This has allowed for a further PV array on the affordable block to the SW of the site. Please see an updated roof layout below. We have now marked this up further to annotate areas that are likely to be overshadowed, and areas that are estimated to be too small for individual PV arrays. In total, an additional ~20m² of PV panel area (13 panels) has been allocated, resulting in an expected further 0.6 tonnes carbon emission reductions for the site.

Legend:

-  Roof amenity space
-  Plant space
-  Roof areas expected to be overshadowed for significant periods, or to be allocated for plant space (see also roof solar irradiance study overleaf)
-  Roof area deemed too small to fit a PV array





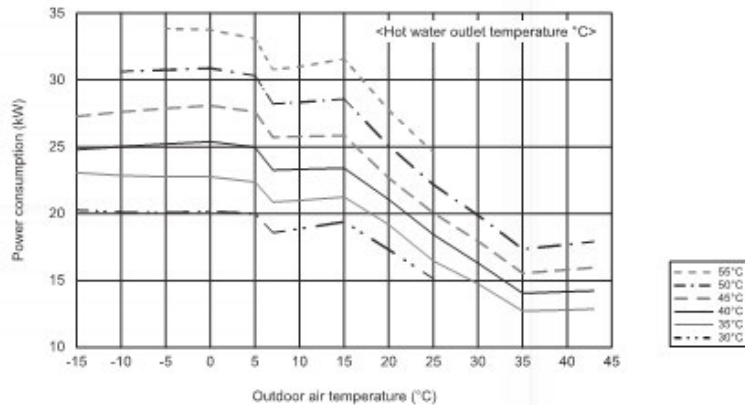
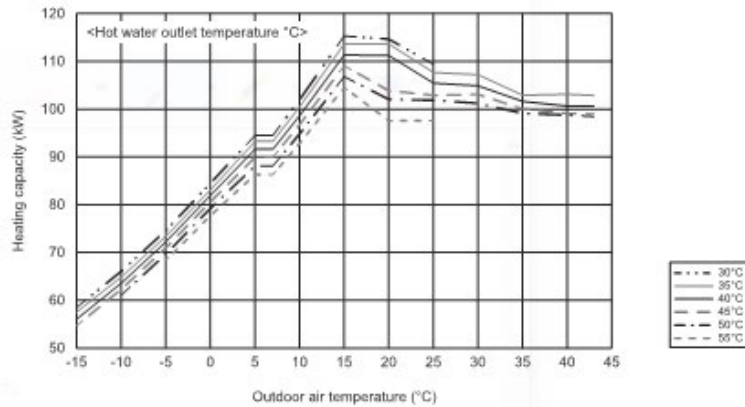
Appendix C – ASHP selection - technical datasheet (Mitsubishi)

2. Product Data

[Cold/hot water outlet/inlet temperature difference 5°C]

EAHV-P900Y(A)(H)

■ Heating Capacity



Appendix D – Correspondence between applicant team and planning officer regarding carbon offset payment approach

From: [REDACTED]
To: [REDACTED] [Avison Young - UK](#)
Cc: [REDACTED] [Avison Young - UK](#); [REDACTED] [Avison Young - UK](#)
Subject: Manor Road - carbon offset fund
Date: 07 May 2019 10:02:40

External Sender

External Sender

Hi [REDACTED]

Yes we're happy with a contribution.

We will have to check the figures once the energy report is finalised (presuming the GLA are seeking further info etc).

Thanks,

[REDACTED]

From: [REDACTED] Avison Young - UK <[REDACTED]@avisonyoung.com>
Sent: 03 May 2019 17:06
To: [REDACTED]@richmondandwandsworth.gov.uk>
Cc: [REDACTED] Avison Young - UK <[REDACTED]@avisonyoung.com>; [REDACTED] Avison Young - UK <[REDACTED]@avisonyoung.com>
Subject: Homebase Manor Road - carbon offset fund

Hi [REDACTED]

One of the GLA's comments requires us to confirm either the amount of funding that will be paid into the borough's carbon offset fund or that an agreement has been reached with the borough that the applicant will undertake a carbon reduction project off-site to meet the shortfall.

As set out in our Energy Strategy, we are proposing a contribution to the borough's carbon offset fund. The current estimate is £451,800 based on anticipated carbon emissions.

Are you able to confirm that this approach is acceptable please? Does the borough have a fund that we can pay into?

Kind regards,

[REDACTED]

Principal Planner
[REDACTED] [@avisonyoung.com](#)

Avison Young
65 Gresham Street
London, EC2V 7NQ
United Kingdom

[REDACTED]

[AVISON YOUNG LIMITED](#)

Appendix E - CO₂ reductions at each stage of the energy hierarchy

New Build Dwellings	Regulated Carbon Dioxide Emission Savings (tonnes CO ₂ /yr)	
	Regulated	Unregulated
Baseline: Part L 2013 Building Regulations with SAP 10 carbon factors	386.4	198
After energy demand reduction (Be Lean)	359.6	198
After heat network / CHP (Be Clean)	359.6	198
After renewable energy (Be Green)	250	198
	Regulated domestic carbon dioxide savings	
	(tonnes CO ₂ /yr)	(%)
Savings from energy demand reduction	26.8	7%
Savings from heat network / CHP	0	0%
Savings from renewable energy	109.6	28%
Cumulative on site savings	136.4	35.2%
Annual savings from offset payment	250.0	-
Dwellings offset Payment Rate (£/tCO ₂)	£1,800	
Total Offset Payment	£450,000	

New Build Retail	Regulated Carbon Dioxide Emission Savings (tonnes CO ₂ /yr)	
	Regulated	Unregulated
Baseline: Part L 2013 Building Regulations with SAP 10 carbon factors	10.5	6
After energy demand reduction (Be Lean)	8.5	6
After heat network / CHP (Be Clean)	8.5	6
After renewable energy (Be Green)	6.0	6
	Regulated non-domestic carbon dioxide savings	
	(tonnes CO ₂ /yr)	(%)
Savings from energy demand reduction	2.0	19.2%
Savings from heat network / CHP	0	0%
Savings from renewable energy	2.5	23.7%
Cumulative on site savings	4.5	42.9%
Total target savings	3.7	35%
Shortfall	N/A	-
Dwellings offset Payment Rate (£/tCO ₂)	£1,800	
Total Offset Payment assuming 35% target requirement (current GLA requirement)	£0	
Total offset payment assuming to Zero Carbon (future GLA requirement)	£10,800	



[REDACTED]

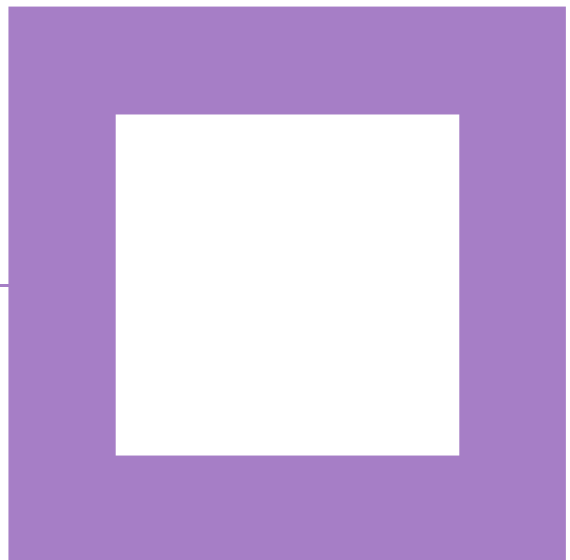
PRINCIPAL SUSTAINABILITY CONSULTANT

[REDACTED]

[REDACTED]@hoarelealea.com

HOARELEA.COM

Western Transit Shed
12-13 Stable Street
London
N1C 4AB
England



[REDACTED]

From: [REDACTED] [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 01 July 2019 13:01
To: [REDACTED] [REDACTED] [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK)
Subject: RE: Homebase, North Sheen.

Hi [REDACTED]
Do you think that there will be any chance of hearing back from your energy colleagues before 5pm tomorrow? Appreciate this has been a tight timescale!
Many thanks

[REDACTED]
Associate

D +44 (0)20 [REDACTED] [REDACTED]
M +44 (0)75 [REDACTED] [REDACTED]
avisonyoung.co.uk

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 26 June 2019 17:48
To: [REDACTED] [REDACTED] (Avison Young - UK); [REDACTED] [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK)
Subject: Re: Homebase, North Sheen.
External Sender

External Sender

Hi [REDACTED]
I will log this but unfortunately I can't put a deadline of less than a week. I will make a note though.

Kind regards

[REDACTED]
Get [Outlook for Android](#)

From: [REDACTED] [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: Wednesday, June 26, 2019 4:58:56 PM
To: [REDACTED] [REDACTED] [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK)
Subject: RE: Homebase, North Sheen.

Hi [REDACTED]
I hope you are well.
Please find attached our response to the outstanding GLA Energy Comments you have set out below. Grateful if you could send our response to your energy colleagues, and if possible provide a response as soon as possible to us so that we can hopefully resolve points prior to committee next week.
Many thanks

[REDACTED]
Associate

D +44 (0)20 [REDACTED] [REDACTED]
M +44 (0)75 [REDACTED] [REDACTED]
avisonyoung.co.uk

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 14 June 2019 16:38

To: [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK)

Subject: Homebase, North Sheen.

External Sender

External Sender

[REDACTED]
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The applicant estimates that a shortfall of 250 tCO₂ will apply to residential areas, and it is therefore currently estimated that a total carbon offset payment of

£450,000 will be payable to the council. The applicant has confirmed that the carbon offset payment is expected to be fixed as part of the S106 negotiations. The borough has confirmed that they are happy with the approach but will have to check the figures once the energy assessment is finalised. If the outstanding comments result in further changes to the CO₂ emissions and carbon offset payment, the applicant should provide correspondence from the borough confirming the figure has been agreed.

This item is outstanding.

Water

The applicant has satisfactorily addressed all of the Stage I comments (see email 7 June 2019).

Senior Strategic Planner

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7084 [REDACTED] | [REDACTED]

www.london.gov.uk/what-we-do/planning

[REDACTED] london.gov.uk

[REDACTED]

From: [REDACTED]
Sent: 26 June 2019 11:16
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK)
Subject: RE: Manor Road LBRUT Committee Report

[REDACTED]

I have an update on the Manor Circus contributions.

The latest cost estimate for the Manor Circus scheme has reduced £2.2m. TfL can't share the actual cost estimate at this stage as it has commercially sensitive information. They did originally state that we would request an contribution which was 15% of the estimated final cost (EFC), and given that is now lower than when they made the original request, they are happy to reduce the request to £330,000 which is 15% of the latest estimate.

Kind regards
[REDACTED]

From: [REDACTED] [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 25 June 2019 12:54
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Subject: Manor Road LBRUT Committee Report [\[https://cabnet.richmond.gov.uk/ieListDocuments.aspx?CId=224&MIId=4702&Ver=4\]](https://cabnet.richmond.gov.uk/ieListDocuments.aspx?CId=224&MIId=4702&Ver=4)

Hi [REDACTED]

We've received confirmation that we are on Richmond's planning committee agenda for next Wednesday.

Committee Report is attached for your information.

We'll be in touch following the committee to let you know how it goes.

Best wishes
[REDACTED]

[REDACTED]
Associate
Planning, Development & Regeneration
[REDACTED] avisonyoung.com

Avison Young
65 Gresham Street
London
EC2V 7NQ
United Kingdom

D +44 (0)20 [REDACTED]
M +44 (0)75 [REDACTED]

avisonyoung.co.uk

[REDACTED]

From: [REDACTED]
Sent: 19 June 2019 15:22
To: [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK)
Subject: RE: Homebase, North Sheen.

Hi [REDACTED]

I have just emailed TfL to discuss this with them. I will be in touch when I know more.

Thanks
[REDACTED]

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 19 June 2019 08:37
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] (Avison Young - UK)
<[REDACTED]@avisonyoung.com>
Subject: RE: Homebase, North Sheen.

Hi [REDACTED]

Do let me know if you need me to contact the TfL officer directly or if you have already approached for additional information?

Thanks
[REDACTED]

[REDACTED]
Associate

D +44 (0)20 [REDACTED]
M +44 (0)75 [REDACTED]

avisonyoung.co.uk

From: [REDACTED] (Avison Young - UK)
Sent: 17 June 2019 18:03
To: [REDACTED] (Avison Young - UK)
Subject: RE: Homebase, North Sheen.

Hi [REDACTED]

Thanks for sending this across. Our viability and energy consultants are reviewing the detailed comments and we will get back to you as soon as possible.

With regard to the TfL request for a financial contribution of £420,000 to the Manor Circus scheme, I confirm that whilst the Applicant doesn't object in principle to a financial contribution towards the improvement works, they do require further information / evidence from TfL regarding the level of the contribution in order for them to establish whether the amount is acceptable.

Are you able to put me in touch with the TfL officer directly to request further information or would you prefer to liaise?

Many thanks

[REDACTED]

[REDACTED]

Associate

D +44 (0)20 [REDACTED] [REDACTED]

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From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 14 June 2019 16:38

To: [REDACTED] [REDACTED] (Avison Young - UK); [REDACTED] [REDACTED] (Avison Young - UK)

Subject: Homebase, North Sheen.

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&

34. The applicant is required to confirm either the amount of funding that will be paid into the borough's carbon offset fund or that an agreement has been reached with the borough that the applicant will undertake a carbon reduction project off-site to meet the shortfall. In both cases evidence of correspondence with the borough confirming the approach should be provided.

The applicant estimates that a shortfall of 250 tCO₂ will apply to residential areas, and it is therefore currently estimated that a total carbon offset payment of £450,000 will be payable to the council. The applicant has confirmed that the carbon offset payment is expected to be fixed as part of the S106 negotiations. The borough has confirmed that they are happy with the approach but will have to check the figures once the energy assessment is finalised. If the outstanding comments result in further changes to the CO₂ emissions and carbon offset payment, the applicant should provide correspondence from the borough confirming the figure has been agreed.

This item is outstanding.

Water

The applicant has satisfactorily addressed all of the Stage I comments (see email 7 June 2019).

[REDACTED]

Senior Strategic Planner

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7084 [REDACTED] | [REDACTED]

www.london.gov.uk/what-we-do/planning

[REDACTED]

london.gov.uk

[REDACTED]

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 07 June 2019 16:42
To: [REDACTED] (Avison Young - UK)
Subject: RE: 4795 - Homebase

Hi [REDACTED]
Thank you for confirming.
Kind regards,

[REDACTED]
Principal Planner

D +44 (0)20 [REDACTED]
M +44 (0) [REDACTED]
[avisonyoung.co.uk](mailto:[REDACTED]@avisonyoung.co.uk)

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 07 June 2019 16:40
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK)
Subject: 4795 - Homebase

External Sender

External Sender

Hi [REDACTED]
I have received the below from our water team. We are now content the proposals are compliant in terms of flood risk, drainage and water.
I am going to send things through piecemeal as and when received. I will be reviewing the rest of your submission / amendments in detail next week and should have other internal responses for you also.
Kind regards
[REDACTED]

Flood Risk Management

2. The FRA considers the risk of flooding from a range of sources, but does not adequately address the residual risk of flooding due to surface water and groundwater. The FRA should address the high risk of surface flooding present within the site, and evaluate the groundwater flooding risk consulting relevant sources such as the borough SFRA.

This has been satisfactorily addressed.

4. The Flood Risk Assessment provided for the proposed development does not comply with London Plan policy 5.12 (and draft New London Plan policy SI.12), as it does not give appropriate regard to residual flood risks from Surface water and groundwater. A full review of flood risk (including residual risks) from all sources of flooding should be provided, and flood resilience and emergency planning measures should be included to manage these risks.

See above.

Sustainable Drainage

7. The attenuation tank volume has been estimated using a simplified method, which gives an estimated attenuation requirement of 715-962m³. The applicant is proposing a volume of 1020m³, with no further explanation. Proposed volume might be enough, but the selected method is not considered sufficiently accurate to ensure that the specified tank volume will allow discharge rates to be restricted to the desired rate. Applicant should ensure proposed volume is adequate by providing evidence of a suitable method of calculation.

This has been satisfactorily addressed.

8. No assessment of exceedance flow paths has been provided. Additional information should be provided showing that exceedance flow paths through the site are available in the case of attenuation system blockage or an extreme rainfall event.

This has been satisfactorily addressed.

9. The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 (and draft policy SI.13). Applicant should provide revised additional attenuation storage volume calculations, and exceedance assessment.

[See above.](#)

The Applicant has satisfactorily addressed all of the Stage I comments. There are no remaining issues.

#LondonIsOpen

[REDACTED]

From: [REDACTED] [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 06 June 2019 17:13
To: [REDACTED] [REDACTED] [REDACTED] (Avison Young - UK)
Subject: RE: Homebase Manor Road 19/0510/FUL - minor revisions

Hi [REDACTED]
We've been speaking with Richmond and they are trying to get the scheme to planning committee on 3 July. To do so, [REDACTED] [REDACTED] needs to have completed his Committee Report by 19 June.
Will you be providing further comments to Richmond regarding the scheme amendments as they have told us that they will require your comments for the committee report?
In addition, do you know if TfL will also be providing additional comments?

Thanks

[REDACTED]
Associate

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[avisonyoung.co.uk](mailto:[REDACTED]@avisonyoung.co.uk)

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 30 May 2019 13:44
To: [REDACTED] [REDACTED] (Avison Young - UK)
Cc: [REDACTED] [REDACTED] (Avison Young - UK)
Subject: RE: Homebase Manor Road 19/0510/FUL - minor revisions

External Sender

External Sender

Thanks [REDACTED]
I can confirm we have received the addendums and revisions which will be uploaded and considered.
Thanks for the trackers, which I also note are for internal purposes.
I will come back to you as appropriate.
Do you have the latest from Richmond, and a committee date?
Kind regards

[REDACTED]

From: [REDACTED] [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 28 May 2019 16:46
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Subject: FW: Homebase Manor Road 19/0510/FUL - minor revisions

Hi [REDACTED]
Further to my previous email, please find attached consultation trackers responding to the consultation comments received from the GLA:

- ☐ Manor Road Homebase GLA Response Tracker;
- ☐ Responses to GLA Energy comments; and
- ☐ Responses to GLA Flooding comments.

These trackers have also been provided to LBRuT. They are for information only and to clarify our complete responses to consultation responses received – these documents are not intended to be posted on the website.

Kind regards,

[REDACTED]
Principal Planner

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M +44 (0) [REDACTED]
avisonyoung.co.uk

From: [REDACTED] (Avison Young - UK)
Sent: 28 May 2019 13:46
To: [REDACTED]
Cc: [REDACTED] (Avison Young - UK)
Subject: Homebase Manor Road 19/0510/FUL - minor revisions

Dear [REDACTED]

Following the receipt of consultation responses, we have undertaken a review of the scheme and have submitted minor revisions to the scheme to LBRuT (as set out in the attached cover letter). As well as amended plans, the following documents have also been submitted either as an addendum to the report originally submitted under 19/0510/FUL or as a revision to the original report:

- Transport Addendum;
- Energy Addendum (SAP worksheets);
- Flood Risk Addendum (and appendices);
- TVIA Addendum;
- Fire Safety Statement (supplementary information);
- Revised Health Impact Assessment;
- Design Rationale Document;
- Revised Wind Microclimate Assessment; and
- Revised Landscape DAS Chapter.

The plans and documents are available at the following link: <https://we.tl/t-P0qVol9puy>

I would be grateful if you could confirm receipt of these documents.

Kind regards,

[REDACTED]
Principal Planner

[\[REDACTED\]@avisonyoung.com](mailto:[REDACTED]@avisonyoung.com)

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28 May 2019

[REDACTED]
[REDACTED]
London Borough Richmond Upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Dear [REDACTED]

Scheme revisions in response to consultation comments – Homebase Manor Road, Richmond, TW9 1YB – 19/0510/FUL

Following receipt of consultation responses to the Homebase Manor Road planning application (reference 19/0510/FUL), Avanton Richmond Development Limited has undertaken a review of the proposed development and accordingly are submitting minor revisions to the scheme proposals.

The main changes to the scheme are as follows:

- Amendments in response to transport comments (for example, provision of showers and lockers associated with proposed cycle parking);
- Amendments to Block A elevations:
 - MNR-AA-BLA-ZZ-DR-A-4102-R3 and MNR-AA-BLA-ZZ-DR-A-4105-R2 – the windows within the core have moved 600mm to the left due to amendments to the core
 - MNR-AA-BLA-ZZ-DR-A-4104-R2 – the windows to the left of the western elevation have moved 600mm to the left due to amendments to the core
- General Arrangement Plans and Block Plans have been updated to include labels for the smoke shafts, risers and AOVs (in order that the plans are in accordance with the Fire Safety Strategy now submitted).

As a result of these changes, the following plans have been amended and should supersede the version of the plan originally submitted under 19/0510/FUL:

Description	Plan submitted under 19/0510/FUL	Revised plan
First Floor Plan	MNR-AA-ALL-01-DR-A-2001-R3	MNR-AA-ALL-01-DR-A-2001-R5
Second Floor Plan	MNR-AA-ALL-02-DR-A-2002-R2	MNR-AA-ALL-02-DR-A-2002-R3
Third Floor Plan	MNR-AA-ALL-03-DR-A-2003-R2	MNR-AA-ALL-03-DR-A-2003-R3
Fourth Floor Plan	MNR-AA-ALL-04-DR-A-	MNR-AA-ALL-04-DR-

	2004-R2	A-2004-R3
Fifth Floor Plan	MNR-AA-ALL-05-DR-A-2005-R2	MNR-AA-ALL-05-DR-A-2005-R3
Sixth Floor Plan	MNR-AA-ALL-06-DR-A-2006-R2	MNR-AA-ALL-06-DR-A-2006-R3
Seventh Floor Plan	MNR-AA-ALL-07-DR-A-2007-R2	MNR-AA-ALL-07-DR-A-2007-R3
Eighth Floor Plan	MNR-AA-ALL-08-DR-A-2008-R2	MNR-AA-ALL-08-DR-A-2008-R3
Roof Plan	MNR-AA-ALL-09-DR-A-2009-R2	MNR-AA-ALL-09-DR-A-2009-R4
Basement Plan	MNR-AA-ALL-B1-DR-A-1999-R2	MNR-AA-ALL-B1-DR-A-1999-R4
Ground Floor Plan	MNR-AA-ALL-GF-DR-A-2000-R3	MNR-AA-ALL-GF-DR-A-2000-R5
Block A Core A First Floor Plan	MNR-AA-BA1-01-DR-A-2101-R2	MNR-AA-BA1-01-DR-A-2101-R3
Block A Core A Second Floor Plan	MNR-AA-BA1-02-DR-A-2102-R2	MNR-AA-BA1-02-DR-A-2102-R3
Block A Core A Third Floor Plan	MNR-AA-BA1-03-DR-A-2103-R2	MNR-AA-BA1-03-DR-A-2103-R3
Block A Core A Fourth Floor Plan	MNR-AA-BA1-04-DR-A-2104-R2	MNR-AA-BA1-04-DR-A-2104-R3
Block A Core A Fifth Floor Plan	MNR-AA-BA1-05-DR-A-2105-R2	MNR-AA-BA1-05-DR-A-2105-R3
Block A Core A Sixth Floor Plan	MNR-AA-BA1-06-DR-A-2106-R2	MNR-AA-BA1-06-DR-A-2106-R3
Block A Core A Roof Plan	MNR-AA-BA1-07-DR-A-2107-R2	MNR-AA-BA1-07-DR-A-2107-R3
Block A Core A Ground Floor Plan	MNR-AA-BA1-GF-DR-A-2100-R2	MNR-AA-BA1-GF-DR-A-2100-R3
Block A Core B, C, D First Floor Plan	MNR-AA-BA2-01-DR-A-2201-R2	MNR-AA-BA2-01-DR-A-2201-R3
Block A Core B, C, D Second Floor Plan	MNR-AA-BA2-02-DR-A-2202-R2	MNR-AA-BA2-02-DR-A-2202-R3
Block A Core B, C, D Third Floor Plan	MNR-AA-BA2-03-DR-A-2203-R2	MNR-AA-BA2-03-DR-A-2203-R3
Block A Core B, C, D Fourth Floor Plan	MNR-AA-BA2-04-DR-A-2204-R2	MNR-AA-BA2-04-DR-A-2204-R3
Block A Core B, C, D Fifth Floor Plan	MNR-AA-BA2-05-DR-A-2205-R2	MNR-AA-BA2-05-DR-A-2205-R3
Block A Core B, C, D Sixth Floor Plan	MNR-AA-BA2-06-DR-A-2206-R2	MNR-AA-BA2-06-DR-A-2206-R3
Block A Core B, C, D Seventh Floor Plan	MNR-AA-BA2-07-DR-A-2207-R2	MNR-AA-BA2-07-DR-A-2207-R3
Block A Core B, C, D Eighth Floor Plan	MNR-AA-BA2-08-DR-A-2208-R2	MNR-AA-BA2-08-DR-A-2208-R3
Block A Core B, C, D Roof Plan	MNR-AA-BA2-09-DR-A-2209-R2	MNR-AA-BA2-09-DR-A-2209-R3
Block A Core B, C, D Basement Floor Plan	MNR-AA-BA2-B-DR-A-2199-R2	MNR-AA-BA2-B-DR-A-2199-R4
Block A Core B, C, D Ground Floor Plan	MNR-AA-BA2-GF-DR-A-2200-R2	MNR-AA-BA2-GF-DR-A-2200-R4
Block B Core A First Floor Plan	MNR-AA-BB1-01-DR-A-2301-R2	MNR-AA-BB1-01-DR-A-2301-R3

Block B Core A Second Floor Plan	MNR-AA-BB1-02-DR-A-2302-R2	MNR-AA-BB1-02-DR-A-2302-R3
Block B Core A Third Floor Plan	MNR-AA-BB1-03-DR-A-2303-R2	MNR-AA-BB1-03-DR-A-2303-R3
Block B Core A Fourth Floor Plan	MNR-AA-BB1-04-DR-A-2304-R2	MNR-AA-BB1-04-DR-A-2304-R3
Block B Core A Fifth Floor Plan	MNR-AA-BB1-05-DR-A-2305-R2	MNR-AA-BB1-05-DR-A-2305-R3
Block B Core A Sixth Floor Plan	MNR-AA-BB1-06-DR-A-2306-R2	MNR-AA-BB1-06-DR-A-2306-R3
Block B Core A Seventh Floor Plan	MNR-AA-BB1-07-DR-A-2307-R2	MNR-AA-BB1-07-DR-A-2307-R3
Block B Core A Eighth Floor Plan	MNR-AA-BB1-08-DR-A-2308-R2	MNR-AA-BB1-08-DR-A-2308-R3
Block B Core A Roof Plan	MNR-AA-BB1-09-DR-A-2309-R2	MNR-AA-BB1-09-DR-A-2309-R3
Block B Core A Ground Floor Plan	MNR-AA-BB1-GF-DR-A-2300-R2	MNR-AA-BB1-GF-DR-A-2300-R4
Block C Core A&B First Floor Plan	MNR-AA-BC1-01-DR-A-2401-R2	MNR-AA-BC1-01-DR-A-2401-R3
Block C Core A&B Second Floor Plan	MNR-AA-BC1-02-DR-A-2402-R2	MNR-AA-BC1-02-DR-A-2402-R3
Block C Core A&B Third Floor Plan	MNR-AA-BC1-03-DR-A-2403-R2	MNR-AA-BC1-03-DR-A-2403-R3
Block C Core A&B Fourth Floor Plan	MNR-AA-BC1-04-DR-A-2404-R2	MNR-AA-BC1-04-DR-A-2404-R3
Block C Core A&B Fifth Floor Plan	MNR-AA-BC1-05-DR-A-2405-R2	MNR-AA-BC1-05-DR-A-2405-R3
Block C Core A&B Sixth Floor Plan	MNR-AA-BC1-06-DR-A-2406-R2	MNR-AA-BC1-06-DR-A-2406-R3
Block C Core A&B Roof Plan	MNR-AA-BC1-07-DR-A-2407-R2	MNR-AA-BC1-07-DR-A-2407-R4
Block C Core A&B Lower Ground Floor Plan	MNR-AA-BC1-B-DR-A-2399-R2	MNR-AA-BC1-B-DR-A-2399-R3
Block C Core A&B Ground Floor Plan	MNR-AA-BC1-GF-DR-A-2400-R2	MNR-AA-BC1-GF-DR-A-2400-R3
Block D Core A&B First Floor Plan	MNR-AA-BD1-01-DR-A-2501-R2	MNR-AA-BD1-01-DR-A-2501-R3
Block D Core A&B Second Floor Plan	MNR-AA-BD1-02-DR-A-2502-R2	MNR-AA-BD1-02-DR-A-2502-R3
Block D Core A&B Third Floor Plan	MNR-AA-BD1-03-DR-A-2503-R2	MNR-AA-BD1-03-DR-A-2503-R3
Block D Core A&B Fourth Floor Plan	MNR-AA-BD1-04-DR-A-2504-R2	MNR-AA-BD1-04-DR-A-2504-R3
Block D Core A&B Fifth Floor Plan	MNR-AA-BD1-05-DR-A-2505-R2	MNR-AA-BD1-05-DR-A-2505-R3
Block D Core A&B Sixth Floor Plan	MNR-AA-BD1-06-DR-A-2506-R2	MNR-AA-BD1-06-DR-A-2506-R3
Block D Core A&B Seventh Floor Plan	MNR-AA-BD1-07-DR-A-2507-R2	MNR-AA-BD1-07-DR-A-2507-R3
Block D Core A&B Eighth Floor Plan	MNR-AA-BD1-08-DR-A-2508-R2	MNR-AA-BD1-08-DR-A-2508-R3
Block D Core A&B Roof Plan	MNR-AA-BD1-09-DR-A-2509-R2	MNR-AA-BD1-09-DR-A-2509-R3

Block D Core A&B Lower Ground Floor Plan	MNR-AA-BD1-B-DR-A- 2499-R2	MNR-AA-BD1-B-DR-A- 2499-R3
Block D Core A&B Upper Ground Floor Plan	MNR-AA-BD1-GF-DR-A- 2500-R2	MNR-AA-BD1-GF-DR- A-2500-R4
Internal Courtyard Section	N/A	MNR-AA-BLA-ZZ-DR- A-3002-R1
Block A Elevations	MNR-AA-BLA-ZZ-DR-A- 4102-R2	MNR-AA-BLA-ZZ-DR- A-4102-R3
Block A Elevations	MNR-AA-BLA-ZZ-DR-A- 4104-R1	MNR-AA-BLA-ZZ-DR- A-4104-R2
Block A Elevations	MNR-AA-BLA-ZZ-DR-A- 4105-R1	MNR-AA-BLA-ZZ-DR- A-4105-R2
Landscape General Arrangement	P11559-00-001-100-01	P11559-00-001-100-04
Typical Tree Pit Details	N/A	P11559-00-001-400-00

All other plans submitted under 19/0510/FUL are unaffected by the revisions and we are still seeking approval for the plans, elevations and sections originally submitted under 19/0510/FUL.

The following documents are formally submitted to the Council either as an addendum to the report originally submitted under 19/0510/FUL or as a revision to the original report:

- Transport Addendum;
- Energy Addendum;
- Flood Risk Addendum;
- TVIA Addendum;
- Fire Safety Statement (supplementary information);
- Revised Health Impact Assessment;
- Design Rationale Document;
- Revised Wind Microclimate Assessment; and
- Revised Landscape DAS Chapter.

We trust that the enclosed information responds to the comments raised. However, should you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely



Principal Planner
0207 911 [REDACTED]

[REDACTED] avisonyoung.com

For and on behalf of GVA Grimley Limited t/a Avison Young

Manor Road, Homebase – GLA Response Tracker April 2019

Paragraph no.	GLA Comment	Response
Housing and Affordable Housing		
26	The Mayor's strong preference is LAR and the applicant should commit to an affordable rent tenure affordability in line with this. The shared ownership units are also subject to affordability criteria to ensure the maximum income threshold is £90,000. The applicant has calculated the gross annual income required for one bedroom units at £67,000 and two bedroom units at £81,000. These reduced maximum income thresholds should be secured for the first three months of marketing.	The application commits to the provision of affordable rented tenure housing. The nature of the affordable rent will be subject to the outcome of the ongoing viability review. We confirm that the shared ownership units will be provided within the affordability thresholds as requested.
27	The applicant should demonstrate that they have fully investigated Mayoral grant funding opportunities as part of this process. If grant can be used to achieve 40% affordable housing, the grant funding can be applied to all the affordable units. If viable, a grant funded scenario of 40% affordable should be secured in the S106 agreement.	We tested a grant funding options and the conclusions of this are contained in the Affordable Housing Statement. The inclusion of full grant funding to support 40% affordable reduces the profit outturn to below that of the proposed scheme and therefore does not improve or maintain scheme viability and so cannot be supported.
28	In accordance with Policy H6 of the draft London Plan and the Mayor's SPG, the S106 agreement must include an early stage viability review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission.	Agreed.
29	If the above information cannot be provided to GLA officer's satisfaction, the application cannot be assessed under the Fast Track route and a financial viability assessment will be required, as well as a late stage review mechanism.	The comments above should provide confirmation to the GLA's queries and allow the scheme to progress on the fast track route.
Children's Playspace		
32	The proposals include a total of 1,409 sq.m of play space across the development, which is in line with the calculated requirements for both 0-5 doorstep play and 5-11 local play. The London Plan requires the 0-5 doorstep play to be provided on site as a minimum. Given the constrained nature of the site, and the provision of 0-5 and 5-11 play space on site, the overall play space offer is considered appropriate. The applicant should confirm that all play space is fully accessible across the development and if not, that the play space is not segregated in mixed tenure blocks.	We welcome confirmation that an appropriate level of playspace is incorporated in the proposals. While some gated access is proposed around the site (in particular to residents' courtyards and controlling access (after hours) from the street along the southern railway corridor) these are primarily for security of the residents and children on site. We propose the site management would allow these to remain open much of the time and be closed at night. It is also proposed that gates would be keyed alike (swipe control) throughout the development, allowing residents access to all common facilities and areas, ensuring no restrictions based on tenure. This ensures that all playspace is fully accessible to residents.
Massing, Scale and Architecture		
37	The simple and refined approach to the architecture, taking cues from the surrounding historic context, is welcomed and the use of varying tones of brickwork across the site is supported. The Council should secure high quality materials and detailed throughout by condition.	Noted, a condition requiring details of materials is anticipated.
Density and Design Scrutiny		
40	Overall, the scheme is considered to be well designed and, subject to addressing the residential quality matters set out below, the density can be supported, notwithstanding conclusions around the character of the site.	Noted, comments are welcomed.
Residential Quality		
42	There are single aspect units that should be designed out of the scheme, as they present a concern in terms of outlook and overall residential quality. There are also some cores serving nine units, which should also be addressed.	<p>Refer to Design Rationale Document (pages 13, 16 and 17 in particular) submitted alongside this tracker, prepared by Assael.</p> <p>The proposals provide a high proportion of dual aspect units (58%) (or 68% when apartments with bay windows are included). There are no single aspect north facing units.</p> <p>There are three cores in the scheme that serve nine units. In these instances, the core has been designed in a way to provide two exits – therefore there are only eight units off a</p>

		single residential corridor.
43	Internal layouts should be provided to ensure that all units will provide liveable environments with good access to natural daylight. The application is supported by an assessment which confirms that 93% of the rooms tested will either meet or exceed the recommended ADF targets.	The internal layouts are shown on the submitted plans and provide good access to natural daylight.
Fire Safety		
45	In the interests of fire safety and to ensure the safety of all building users, Policy D11 of the draft London Plan seeks to ensure that development proposals achieve the highest standards of fire safety. The applicant must provide a statement that demonstrates that all features and materials would comply with Part B of the Building Regulations.	Refer to the Fire Safety Statement submitted as part of the submitted scheme information.
Heritage		
51	A view from the top of the Pagoda within the Royal Botanic Gardens Kew World Heritage Site has been provided, which demonstrates that there would be minimal visual impact. The applicant should however demonstrate that the proposals would not be visible in the background of any of the linear views within Kew Gardens, particularly long-range views of the Pagoda.	Two additional views have been tested – from Cedar Avenue and the Broad Walk looking across the Palm House Pond. These are locations identified by Kew Gardens. A TVIA Addendum has been submitted for the additional views requested. Arc conclude that the scheme proposal will be imperceptible within the views and that there will no change in the view as a result of the proposal.
Climate Change		
53	The Energy Hierarchy has been followed; the proposed strategy is generally supported; however, the applicant should submit additional information to ensure compliance with the London Plan policies.	Refer to the Energy Statement Addendum submitted to LBRuT, prepared by Hoare Lea.
56	A detailed report on energy has been issued under separate cover to Richmond Council and the applicant. The key points requiring action are outlined below: <ul style="list-style-type: none"> • The GLA spreadsheet has been used correctly and the proposals use SAP 10 emissions factors; • Further passive measures for domestic overheating and model against DSY2 and DSY3 should be considered; • The domestic cooling proposed for some units is not supported; • A site-wide system is required, rather than the building level system currently proposed; page 9 • Further information on PV and heat pumps required; and • Domestic emissions are slightly below the 35% target so needs to be revisited. 	Refer to the Energy Statement Addendum submitted to LBRuT, prepared by Hoare Lea.
Flood Risk, Drainage and Water		
58	The Flood Risk Assessment provided for the proposed development does not comply with London Plan policy 5.12 and draft London Plan policy SI12, as it does not give appropriate regard to residual flood risks from surface water and groundwater. A full review of flood risk (including residual risks) from all sources of flooding should be provided, and flood resilience and emergency planning measures should be included to manage these risks.	<p>A Flood Risk Addendum has been prepared in response to these comments and has been submitted to LBRuT.</p> <p>The risk of surface flooding is addressed in the FRA in section 4.2 where data from the EA was presented and in section 5.2 where it was deemed that there was no probability of flooding from surface water based on the data provided by Thames Water.</p> <p>The FRA Addendum discusses the probability of flooding from groundwater (5.3). Although borehole records exist nearby to the site, groundwater levels vary and it is not possible to properly assess the risk and potential of flooding from groundwater without site specific boreholes and site investigations.</p> <p>The FRA Addendum covers mitigation against the risk of flooding by groundwater through limiting the run-off from blue roofs to 1 l/s per building and provision of an exceedance flow path through the site which routes water resulting from groundwater flooding away from the buildings and road adjacent to the site and into areas where any flooding which occurs would leave a safe route of exit for residents. This is shown on Fairhurst drawing 126782-C-4000 which is included as an Appendix to this document as well as to the FRA.</p>
59	The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 and draft policy SI13. The applicant should provide revised additional attenuation storage volume calculations, and exceedance assessment.	<p>The storage volume proposed in the previous revision of the FRA was based on the whole of the non-roof area being hard landscaping.</p> <p>An infiltration coefficient of 0.1 m/hr1 was used in these calculations as the most conservative estimate for expected soil conditions (gravels) in absence of site specific soakage tests at this stage. To mitigate the risk of no site specific tests being available, an additional 5% as a safety factor was added to the required volume.</p>

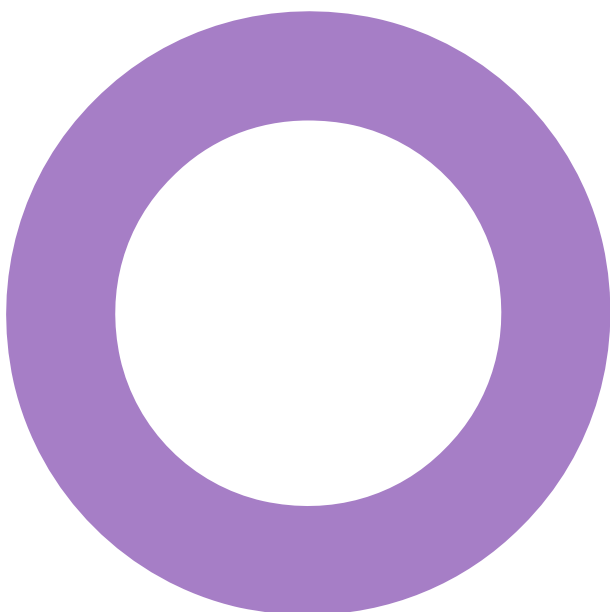
		<p>A review of the storage required has been undertaken as part of the FRA Addendum;</p> <ul style="list-style-type: none"> The soft landscaping has been measured and the impermeable non roof area has been revised to 0.53ha based on the most up-to-date development plans The infiltration coefficient has been adjusted to be in the mid-range of that for gravel to a value of 0.5 m/hr. The 5% for safety factor has been removed. <p>The revised site and calculation methodology has been modelled in MicroDrainage Source Control which results in a storage requirement of 234m³.</p> <p>The revised calculations are provided in Appendix A1 of the Addendum and as an Appendix to the FRA.</p> <p>Details of the tank sizes and volumes are provided in Appendix A1 of this Technical Note as well as on Fairhurst drawing 126782-C-4000, included as an Appendix to both this Technical Note and the FRA.</p>
Car Parking		
61	The development is car-free with the exception of 12 disabled person car parking spaces. A Car Park Design and Management Plan is required which details the location of an additional 7% of disabled persons parking should demand arise and how it will be monitored; this should be secured as a condition or through the S106. 20% of the spaces are required to have Electric Vehicle Charging Points, with passive provision for the remaining spaces. This should be secured by condition.	The revised plans submitted to LBRuT detail the active/passive EV charging points, and the additional accessible parking bays. For further information, refer to the TA Addendum.
62	Owners and occupiers of the development will be restricted from obtaining parking permits for the adjoining CPZ. This should be secured through an appropriate legal mechanism.	The Applicant notes that this will be secured through an appropriate legal mechanism.
63	Two electric car club spaces are proposed on site. Three years free car club membership should be secured for all new residents.	The Applicant is willing to provide three years free car club membership.
Cycle Parking		
64	The cycle parking provision proposed is in accordance with draft London Plan standards. Cycle Parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Storage areas are required to be broken down into smaller areas for security.	The revised plans submitted to LBRuT detail the amended cycle storage area in the basement, which complies with draft London Plan standards.
65	Shower and locker facilities should be provided for the non-residential uses on site.	Assael have now provided an updated drawing detailing the proposed combined accessible toilet and shower unit in the commercial units. This has now been incorporated into the revised TA Addendum
Trip Generation and Modal Split		
66	Further work is required on the trip generation assessment. Once this is updated, TfL will be able to assess the impact on the highway and public transport networks.	Covered in detail in the revised TA Addendum (section 3).
Buses		
67	Information on peak hour direction of travel for bus trips, based on Census data, is required so TfL can determine if a bus contribution is required.	Covered in detail in the revised TA Addendum (section 4).
Pedestrian and Cycle Access		
68	The redevelopment of the site will improve permeability through the site and will help to deliver improvements that help to support some of the ten Healthy Streets Indicators. However, the TA should identify if there any measures that could be implemented which would prevent any of the recorded accidents along Manor Road (excluding Manor Circus) and contribute towards the Vision Zero approach. Furthermore, the siting of the existing pedestrian refuges on Manor Road should be reviewed in relation to pedestrian desire lines, given the layout of the proposed development.	Covered in detail in the revised TA Addendum (section 6).
Manor Circus		
69	TfL are currently developing a scheme to address road safety and improve pedestrian and cycle facilities at Manor Circus. Given that the proposed development will increase pedestrian and cycle movements at Manor Circus, a financial contribution of £420,000 is required towards the implementation of this scheme.	As the scheme is already a funded schemes, the Applicant does not consider this financial contribution to be a reasonable request.

Supporting Plans		
70	<p>The following plans should be secured:</p> <ul style="list-style-type: none">• Car Park Design and Management Plan to be secured.• Travel Plan to be secured, monitored, reviewed, and enforced through the s106.• A Delivery and Servicing Plan to be secured by condition.• A Construction Logistics Plan (CLP) to be secured by condition and discharged in consultation with TfL.	<p>The Applicant is willing to accept the proposed conditions.</p>

**Manor Road.
Richmond.**
**Avanton Richmond
Development Ltd.**

ENERGY STRATEGY
RESPONSE TO GLA COMMENTS

REVISION 02 – 16 MAY 2019



Audit sheet.

Rev.	Date	Description of change / purpose of issue	Prepared	Reviewed	Authorised
01	25/04/2019	First issue for team comments	██████	-	-
02	16/05/2019	Updated with team comments	██████	██████	██████

This document has been prepared for Avanton Richmond Development Ltd only and solely for the purposes expressly defined herein. We owe no duty of care to any third parties in respect of its content. Therefore, unless expressly agreed by us in signed writing, we hereby exclude all liability to third parties, including liability for negligence, save only for liabilities that cannot be so excluded by operation of applicable law. The consequences of climate change and the effects of future changes in climatic conditions cannot be accurately predicted. This report has been based solely on the specific design assumptions and criteria stated herein.

Project number: 23/23145

Document reference: REP-2323145-5A-LFW-20190425-Response to GLA comments-Rev 02

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Executive summary

This document provides a response to the comments provided by the Greater London Authorities (GLA) on 03/04/2019 to the Energy Strategy prepared by Hoare Lea in support of the planning application for Manor Road, Richmond (case number 4795).

For ease, comment made by the GLA are included within this document in full in pink coloured text, with the team's response immediately following each comment in black text.

1. Overview of proposals

1. The Energy Hierarchy has been followed; the proposed strategy is generally supported; however, the applicant should submit additional information to ensure compliance with the London Plan policies.
2. The applicant has used the GLA's Carbon Emission Reporting spreadsheet, which has been developed to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors. The link to the spreadsheet can be found here:
<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>. This has been submitted for review, which is welcomed.
3. For the purposes of this assessment, the applicant will be estimating the CO₂ emission performance against London Plan policies using the SAP 10 emissions factors.

Applicant response

- Point 1: Additional information is provided within this document.
- Points 2&3: No response required.

2. BE LEAN

4. A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development.
5. The applicant is encouraged to investigate the potential for improving the thermal bridging default assumptions.

Applicant response

- Point 4: No response required
- Point 5: The approach at the planning stage has been to use pragmatic inputs for the thermal bridging assumptions within the SAP calculations. Improved thermal bridging would likely make a notable difference to the results, however at this stage of the design, the build-up of each junction has not yet been developed in sufficient detail to assess the thermal bridging values with certainty. Thus, it is expected the inputs used will be achievable as a minimum, and improvements likely to be realised in the detailed design. The only improvement above 'default' inputs assumed at this stage has been for window lintels, as it is expected it will be possible to use a proprietary product detail to achieve an improved value for this junction (i.e. likely no requirement for specialist detailed calculations). The team will investigate further possible improvements to the thermal bridging in the next design stage, with the aim to achieve further carbon reductions towards the 10% target from Be Lean measures.

3. CO₂ and Energy Performance

3.1 Domestic

6. The domestic element development is estimated to achieve a reduction of 26 tonnes per annum (7%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. The applicant should note that the new draft London Plan includes a target of a 10% improvement on 2013 Building Regulations from energy efficiency which applicants should be aiming towards. The applicant should therefore model additional energy efficiency measures and commit to higher carbon savings through energy efficiency alone.
7. The applicant has provided a single example of the 'be lean' DER and TER output sheets from the modelling software; they should provide these for all units modelled that contribute to the reported CO₂ emissions.

Applicant response

- Point 6: As the new London Plan is draft only, the policies are yet to be adopted, and as such have not been incorporated into the proposals laid out within the energy strategy. That being said, the residential areas of the development are expected to achieve 7% carbon emission reductions from passive design and energy efficiency alone, and therefore it is the team's opinion that the design has indeed *aimed towards* the higher standard expected to be required with the implementation of the upcoming London Plan (10%). Further, as confirmed in point 5 above, the team will investigate further possible improvements to the thermal bridging in the next design stage, with the aim to achieve further carbon reductions towards the 10% target from Be Lean measures.
- Point 7: All Be Lean DER and TER output sheets from the SAP modelling are provided as a separate .zip file alongside this response.

3.2 Non-domestic

8. The non-domestic element of the proposed development is estimated to achieve a reduction of 2 tonnes per annum (20%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.
9. The applicant has provided the 'be lean' BRUKL sheets from the modelling software.
10. Tenant fit-outs will be required to meet the Non-Domestic Building Services Compliance Guide (2013) as a minimum and also meet the minimum energy standard for BREEAM Excellent; this is welcomed.

Applicant response

- Points 8, 9&10: No response required.

4. Energy Demand and Fabric Energy Efficiency

11. The applicant has provided the predicted energy demand for the development, this is welcomed.
12. The applicant has reported the Part L Fabric Energy Efficiency (FEE) performance for the baseline and the 'be lean' scenarios and it is estimated that the development will achieve a reduction of 4% in annual heating and cooling demand.

Applicant response

- Points 11&12: No response required.

5. Cooling and Overheating

13. The demand for cooling and the overheating risk will be minimised through low glazing g-value of 0.4 and external awning above the commercial unit glazing.

14. The applicant is assessing whether to incorporate thermal mass to living room ceilings in the form of phase change plasterboard which, coupled with windows opened at night, will help to reduce high temperatures in the daytime, as the phase change material acts as a 'coolth-sink'. This has been included for in the modelling and is encouraged.

Applicant response

- Points 13&14: No response required.

5.1 Domestic

15. The applicant has completed the domestic overheating checklist to identify potential site-specific risks which may lead to overheating, this is welcomed.
16. A Dynamic Overheating Analysis has been undertaken to assess the overheating risk within the dwellings using the CIBSE TM59 methodology and the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.
17. The results show that the design proposals are anticipated to meet the CIBSE recommendations for comfort for all units, assuming natural ventilation i.e. occupants can open the windows, blinds, mechanical ventilation and phase change material ceilings. Reliance on internal blinds and mechanical ventilation is not encouraged. Therefore:
- The applicant should consider further passive design measures in line with Policy 5.9, to reduce the reliance on blinds and mechanical ventilation and ensure all units pass the requirements with these features at a minimum.
 - The applicant should confirm that any required blinds will be included in the base build and demonstrate that the blinds do not interfere with the effective opening area of windows.
18. The applicant has also assessed a sample of corridors and has proposed a strategy to ensure the comfort criteria can be met.
19. The applicant proposes to implement cooling to a proportion of apartments, with preference given to those apartments at risk of experiencing excessive noise from external sources. It is not expected that 'active cooling' will be proposed for any residential developments, and on that basis it is not supported.

Applicant response

- Point 15: No response required.
- Point 16: The assessment was carried out in line with the TM59 methodology, section 2.2-11 of which states that the assessment should be carried out using the DSY1 2020, high emissions, 50% scenario weather file. In line with the same methodology, as the development is not situated in the central London heat island, and as it is not expected that there will be a concentration of vulnerable occupants, it is considered that the weather file used is already a good assessment of overheating risk without the need to test further weather files. The design was adjusted in response to the TM59 testing, with changes made to window sizes and opening types to ensure these can be securely opened at night, and suggested phase change material included in some ceilings to add thermal mass.
- Point 17: In response to the two separate points made, the applicant notes:
 - Further passive measures: Blinds have not been included within the compliant runs of the TM59 assessment, as confirmed in table 19 of the energy strategy report. Further, the compliant results given in the planning supplication were based on a natural ventilation only scenario. Apartments will be fitted with mechanical ventilation with heat recovery for background ventilation, but it is not expected this mechanical ventilation will form part of the overheating risk mitigation strategy. All tested units are currently expected to pass TM59 without the need for blinds or mechanical ventilation.
 - It is not expected that blinds will be required as part of the overheating risk mitigation strategy.
- Point 18: No response required.

- Point 19: As the TM59 have confirmed within the energy strategy report, it is expected that apartments will be able to meet the overheating risk mitigation criteria in the naturally ventilated scenario. However, the acoustic consultant has advised the site is exposed to moderate noise levels, and therefore residents in some apartments may wish to keep windows closed to obtain internal acoustic comfort. The test of the 'sealed façade' scenario shows that not all rooms are expected to be able to meet TM59 criteria with mechanical ventilation alone. This is as can be expected for developments tested using the London DSY1 2020 50% weather file, for the following reasons:
 - The criterion is that occupied spaces should not exceed an operative temperature of 26°C for more than 3% of annual occupied hours (Jan-Dec)
 - External ambient temperatures in the London DSY1 exceed 26°C by 2.7% of annual hours. This effectively precludes the use of mechanical ventilation as a design solution to mitigate overheating risk, since whatever the amount of mechanical supply air, and / or passive design measures, internal temperatures will exceed the 3% threshold due to unavoidable heat gains

It is therefore considered prudent, in apartments which are expected to experience higher internal temperatures, and which are located in areas that may experience noise above the recommended WHO thresholds, that cooling is a reasonable option to further mitigate risk of overheating to occupants. Occupants will also have the option to use openable windows as a strategy to mitigate overheating should they so choose, and it has been shown that all tested units are expected to pass the TM59 'adaptive' criteria in this way.

5.2 Non-domestic

20. The area weighted average (MJ/m²) and total (MJ/year) cooling demand for the actual and notional building has been provided and the applicant has demonstrated that the actual building's cooling demand is lower than the notional.

Applicant response

- Point 20: No response required.

6. BE CLEAN

6.1 District heating

21. The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. They should contact the borough and ask whether they know of any schemes coming through; evidence of this correspondence should be provided.
22. The applicant has provided a commitment to ensure that the development is designed to allow future connection to a district heating network. They suggest that space allowance has been made for heat interface units to the ground floor of each building, and a potential distribution route has been identified, should a district energy system become available in future which the Proposed Development could connect to. Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network have been provided.
23. The applicant is not proposing a site wide heat network and is instead proposing a communal heating system at a building level. The dwellings within each building will connect to the rooftop ASHPs via Heat Interface Units (HIU). Capped-off connections will be provided to the commercial units which will be available to tenants, although the modelling assumes point-of-use water heaters will be provided for their DHW. The applicant argues that the additional distribution losses from a site-wide network will result in a 12% increase in development CO₂ emissions. They also suggest they can't accommodate all external condenser units on the roof of a single block. However, future-proofing for district heating is a strategic policy for reasons and the development is within an area with potential for district heating in future; therefore, the applicant is required to provide a site-wide heat network served by a single energy centre to future proof the development for easy connection to a wider heat network should one become available. Moreover, the applicant should investigate how the number of energy centres can be minimised.

Applicant response

- Point 21: We have contacted the Borough of Richmond Upon Thames to enquire about existing or planned district heating networks in the vicinity of the proposed development. We currently are awaiting a response from the council's consultant, therefore this information will follow as soon as it is available.
- Point 22: No response required.
- Point 23: The energy strategy has been produced with the clear objective to minimise carbon emissions from the development, and provide a robust provision of services at a reasonable cost to occupants. As stated in the energy strategy report, incorporating district energy pipework would not only add to the capital cost of the development but would also be expected to add increased operational cost due to increased distribution losses in district pipework, resulting in increased carbon emissions, and increased energy bills to all occupants. In accordance with the London Heat Map, there are currently no proposed future district energy networks in the vicinity of the site, and as the site is constrained by railways on two sides it is considered there would be a very small chance any future network would realistically come within the vicinity of a connection point. It is the applicant's opinion that, given the combination of increased carbon emissions, increased capital and operational cost, and the negligible chance of a future district energy connection happening for this site, that the provision of a sitewide connection between energy centres on day 1 would be harmful to this strategy. The strategy that has been put forward to enable potential future connection is deemed by the applicant to be a reasonable compromise (a space allowance for a future potential heat exchanger at the ground floor of each block, so that a connection can be made in future, should a low carbon network become available, albeit this would require some ground work to extend the district connection from the site boundary to each block).

7. BE GREEN

24. The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Photovoltaic (PV) panels and Air Source Heat Pumps.
25. A reduction in regulated CO₂ emissions of 107 tonnes per annum (29%) will be achieved through this third element of the energy hierarchy.

Applicant response

- Point 24: No response required.
- Point 25: The applicant has undertaken a further review of the roof areas based on the latest design, and one further location suitable for a PV array has been identified. Please refer to Appendix B. This location is expected to be able to accommodate approx. 20 m² of PV panel area (13 panels), with an estimated resulting 2.4 tCO₂ additional carbon emission reductions. Please see further details under the response to point 29 below.

7.1 Heat pumps

26. Centralised heat pumps are being proposed in the form of Air Source Heat Pumps (ASHPs) with condensing units on the roof. DHW will be provided by electric immersion top-up.
27. The applicant provides a cost comparison of the operation cost of communal air source heat pumps and gas boilers; with RHI included for the ASHPs are significantly cheaper per kWh of heat, however, without RHI, gas boilers are marginally cheaper.
28. Further information on the heat pumps should be provided including:
 - a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.
 - b. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).

- c. Manufacturer datasheets showing performance under test conditions for the specific source and sink temperatures of the proposed development and assumptions for hours spent under changing source temperatures. Whether any additional technology is required for hot water top up and how this has been incorporated into the energy modelling assumptions.
- d. The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently.
- e. A commitment to monitor the performance of the heat pump system post-construction to ensure it is achieving the expected performance approved during planning. (It is recommended that boroughs condition this).

Applicant response

- Points 26-27: No response required.
- Point 28:
 - a. The ASHP system is estimated to supply the following energy to the development:
 - Space Heating: 497 MWh/annum, equivalent to 100% of the total demand for residential areas of the site.
 - Domestic Hot Water: 655 MWh/annum, equivalent to 90% of the total demand for residential areas of the site.
 - Cooling: 42 MWh/annum, equivalent to 100% of the total demand for residential areas of the site.
 - b. The SCOP for the heat pumps proposed is 2.89. This is based upon data provided by the manufacturer, showing the heat output and power input at a range of conditions (please refer to appendix C). The manufacturer has confirmed the SCOP calculation is based upon the following breakdown of runtime at each condition:
 - 5% at -5°C
 - 40% at 3°C
 - 45% at 9°C
 - 10% at 15°C
 - c. The direct electric element has been included in the energy modelling in the form of a compound COP, which accounts for the proportion of top-up from the immersion heater, with a COP of 1. Please refer to page 11 of the energy strategy submitted in support of the planning application for further details.
 - d. The design heat source (air) temperature is -4°C, and the proposed LTHW distribution temperature is 55°C. This has been chosen to minimise the amount of DHW production which will be borne by the direct electric element. Reducing the LTHW distribution temperature would increase the proportion of direct electric heating required, which would significantly increase the running cost to all residential occupants, and the total carbon emissions of the system. Therefore, although a lower distribution temperature could provide benefits in terms of ASHP efficiency and distribution loss reductions, it has been considered that the proposed solution will result in the best overall outcome for the scheme. Estimated distribution losses for the scheme have been included within the energy strategy provided in support of the Planning Application.

7.2 PVs

29. PV is being proposed equating to circa 120 m² of net PV area; the applicant should confirm the proposed kWp. From the basic roof layout provided, there appears to be additional space for PV. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised and clearly demonstrating any constraints. The applicant is required to maximise the on-site savings from renewable energy technologies, regardless of the London Plan targets having been met, and therefore the PV proposals should be reviewed. It should also be noted that the PV savings reported of 3.3 tonnes of CO₂ /annum are considered very low.

Applicant response

- Point 29: The PV array proposed in the planning application stage energy strategy was equivalent to an estimated 18kWp. This was based on an appraisal of available, accessible and unshaded roof area. The applicant has undertaken a further review of the roof areas based on the latest design information, and one further location suitable for a PV array has been identified. This location is expected to be able to accommodate 13 further panels, equivalent to approx. 20 m² of PV panel area, and equivalent to an additional 4kWp (i.e. now a total of 22kWp). This is estimated to result in 0.6 tCO₂ additional carbon emission reductions (i.e. now a total estimated carbon emission reduction of 3.9 tCO₂/year from PV). The roof mark-up which was provided within the energy strategy has been updated to confirm where roofs are expected to be overshadowed, and where roof areas are expected to be of insufficient size to accommodate an array of PVs. Please refer to Appendix B. PV panels have been spaced apart to ensure overshadowing will be minimised from surrounding elements such as parapets, and from adjacent rows of PVs, and to allow access for maintenance. The spacing has been based on good-practice guidance – please refer to Appendix B for further details.
- It should be noted here also that carbon emission reductions from solar PV are reduced when using SAP 10 carbon factors. Had the Part L 2013 carbon factor for electricity been used, the updated proposed array (22kWp) would have been expected to result in a carbon emission reduction of approx. 8.7 tCO₂ /annum.

8. DOMESTIC CARBON SAVINGS

Based on the energy assessment submitted at stage I, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy for the domestic buildings.

Table: CO₂ emission reductions from application of the energy hierarchy

	Total residual regulated CO ₂ emissions	Regulated CO ₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	385		
Energy Efficiency	359	26	7%
CHP	359	0	0%
Renewable energy	254	105	27%
Total		131	34%

- An on-site reduction of 131 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected for the domestic buildings, equivalent to an overall saving of 34%.
- A minor discrepancy between the value reported in the Energy Statement and that reported in the GLA spreadsheet is noted; the value in the spreadsheet has been assumed to be correct here.
- The carbon dioxide savings fall short of the on-site target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions.
- The domestic buildings are required to meet the zero carbon target as the application was received by the Mayor on or after the 1st October 2016. The applicant should therefore ensure that the remaining regulated CO₂ emissions, equivalent to [X]tonnes of CO₂ per annum, is met through a contribution to the borough's offset fund.
- The applicant is required to confirm either the amount of funding that will be paid into the borough's carbon offset fund or that an agreement has been reached with the borough that the applicant will undertake a carbon reduction project off-site to meet the shortfall. In both cases evidence of correspondence with the borough confirming the approach should be provided.

Applicant response

- Points 30-32: As set out within the energy strategy report, the expected annual carbon savings for residential areas is 35%, in line with the London Plan target for on-site carbon emission reductions, and the development is thus expected to meet the target set within policy 5.2. The discrepancy between the results given in the GLA spreadsheet provided and the energy strategy report (3tCO₂/annum) is the contribution from the PV array. Including a PV array into SAP calculations is a detailed exercise which is best left for when a full, detailed SAP model is produced for all unit types – expected at RIBA Stage 4. At the planning stage, the carbon emission reduction from PVs (~3tCO₂/annum, as confirmed in the Be Lean section of the report) were added to the reported SAP calculation results, which include passive design, energy efficiency, and ASHP.
- Point 33: As detailed in table 1 within the Energy Strategy report, it was estimated as part of the planning application reporting that a total carbon offset payment of £451,800 would be payable to offset the estimated 251 tCO₂ shortfall from the zero carbon target for residential areas. With the additional PV array identified (as per the response to point 29 above), it is now estimated that a shortfall of **250 tCO₂** will remain for residential areas, and it is therefore currently estimated that a total carbon offset payment of **£450,000** will be payable to the council.
- Point 34: The carbon offset payment is expected to be fixed as part of the S106 negotiations. It has been confirmed in correspondence between the planning consultant and the planning officer from Richmond that this approach is supported. Please see appendix D for further details of this correspondence.

9. NON-DOMESTIC CARBON SAVINGS

Based on the energy assessment submitted at stage I, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy for the non-domestic buildings.

Table: CO₂ emission reductions from application of the energy hierarchy

	Total residual regulated CO ₂ emissions (tonnes per annum)	Regulated CO ₂ emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	10		
Energy Efficiency	8	2	20%
CHP	8	0	0%
Renewable energy	6	2	20%
Total		4	40%

35. An on-site reduction of 4 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected for the non-domestic buildings, equivalent to an overall saving of 40%.
36. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.
37. All comments above should be addressed before compliance with London Plan energy policy can be verified.

Applicant response

- Points 35-36: No response required.
- Point 37: Response to all comments have been provided within this note.

Appendix A – Correspondence with LBRuT regarding local district heating networks

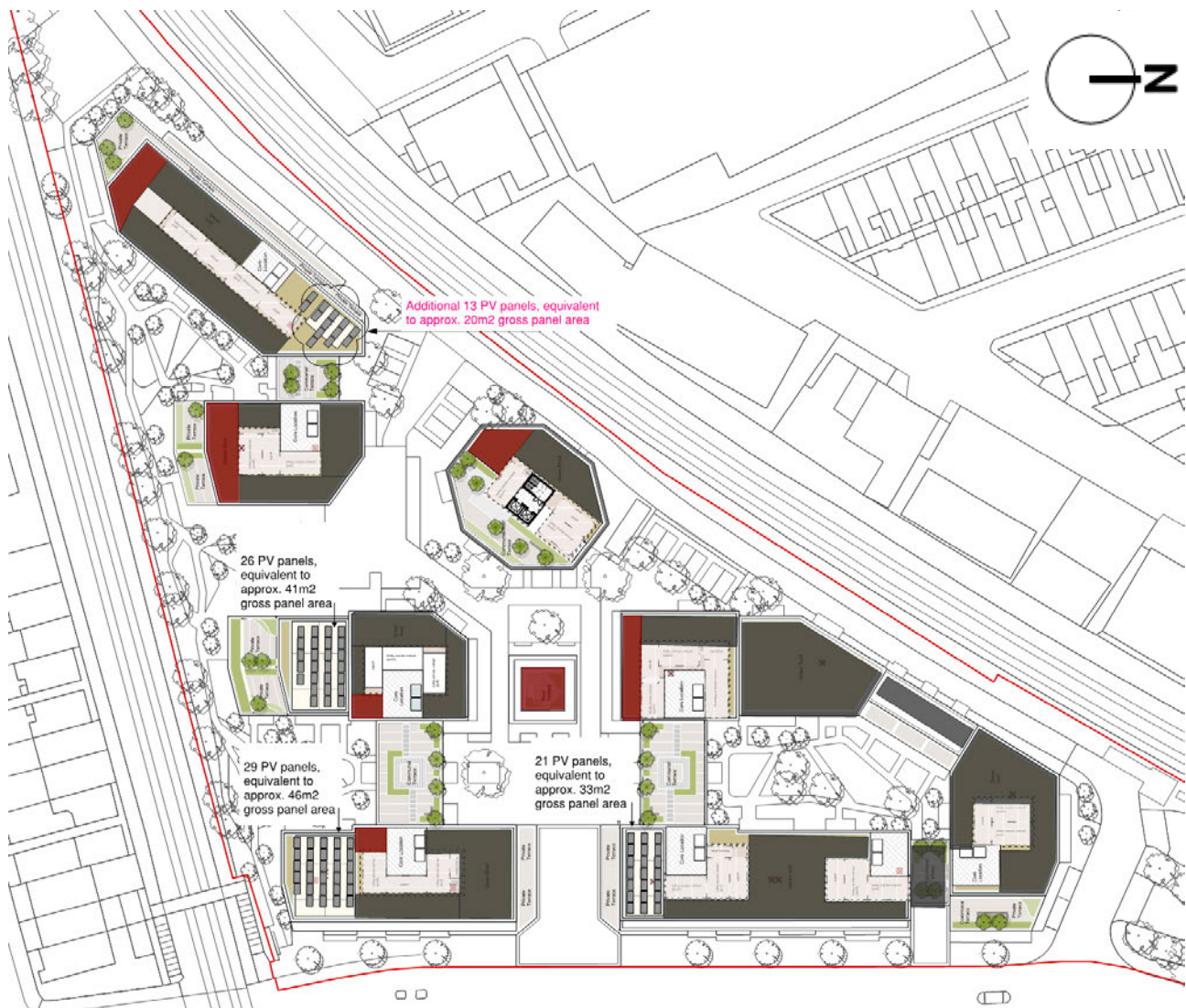
To follow – awaiting response from Richmond’s consultant.

Appendix B – PV array sizing

The roof layout has been detailed further since the planning application, and plant allocations have changed slightly. This has allowed for a further PV array on the affordable block to the SW of the site. Please see an updated roof layout below. We have now marked this up further to annotate areas that are likely to be overshadowed, and areas that are estimated to be too small for individual PV arrays. In total, an additional ~20m² of PV panel area (13 panels) has been allocated, resulting in an expected further 0.6 tonnes carbon emission reductions for the site.

Legend:

- Roof amenity space
- Plant space
- Roof areas expected to be overshadowed for significant periods
- Roof area deemed too small to fit a PV array



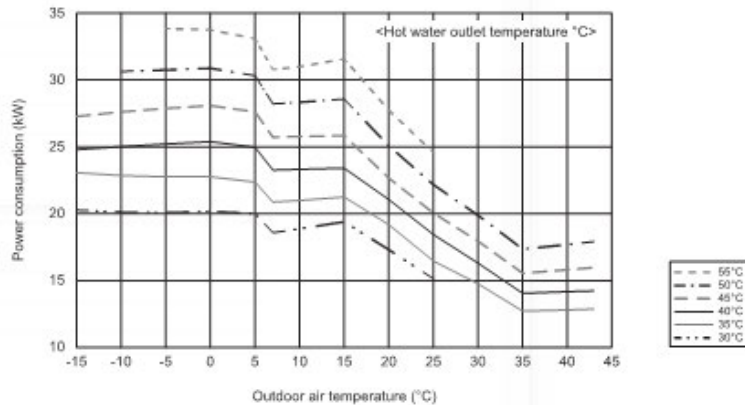
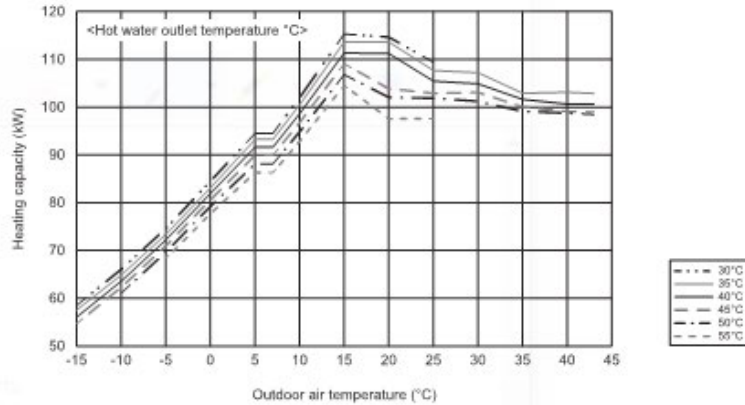
Appendix C – ASHP selection - technical datasheet (Mitsubishi)

2. Product Data

[Cold/hot water outlet/inlet temperature difference 5°C]

EAHV-P000YA(H)

■ Heating Capacity



Appendix D – Correspondence between applicant team and planning officer regarding carbon offset payment approach

From: [REDACTED]
To: [REDACTED] [Avison Young - UK](#)
Cc: [REDACTED] [Avison Young - UK](#); [REDACTED] [Avison Young - UK](#)
Subject: Manor Road - carbon offset fund
Date: 07 May 2019 10:02:40

External Sender

External Sender

Hi [REDACTED]

Yes we're happy with a contribution.

We will have to check the figures once the energy report is finalised (presuming the GLA are seeking further info etc).

Thanks,
[REDACTED]

From: [REDACTED] Avison Young - UK <[REDACTED]@avisonyoung.com>
Sent: 03 May 2019 17:06
To: [REDACTED] <[REDACTED]@richmondandwandsworth.gov.uk>
Cc: [REDACTED] Avison Young - UK <[REDACTED]@avisonyoung.com>; [REDACTED] Avison Young - UK <[REDACTED]@avisonyoung.com>
Subject: Homebase Manor Road - carbon offset fund

Hi [REDACTED]

One of the GLA's comments requires us to confirm either the amount of funding that will be paid into the borough's carbon offset fund or that an agreement has been reached with the borough that the applicant will undertake a carbon reduction project off-site to meet the shortfall.

As set out in our Energy Strategy, we are proposing a contribution to the borough's carbon offset fund. The current estimate is £451,800 based on anticipated carbon emissions.

Are you able to confirm that this approach is acceptable please? Does the borough have a fund that we can pay into?

Kind regards

[REDACTED]
Principal Planner
[REDACTED] [@avisonyoung.com](#)

Avison Young
65 Gresham Street
London, EC2V 7NQ
United Kingdom

[REDACTED]
[\[REDACTED\]](#)



[REDACTED]

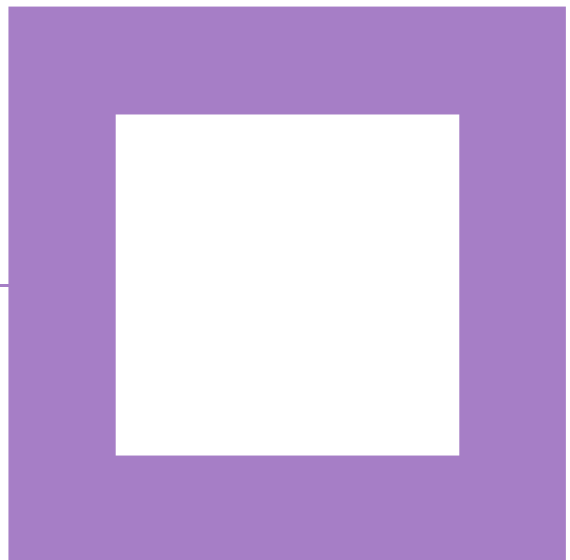
PRINCIPAL SUSTAINABILITY CONSULTANT

[REDACTED]

[REDACTED]@hoarelea.com

HOARELEA.COM

Western Transit Shed
12-13 Stable Street
London
N1C 4AB
England



1.1.11

1.1.12

Former Homebase, Manor Road, Richmond

Response to Stage 1 Decision Flood Risk, Water and Drainage

April 2019



FAIRHURST

CONTROL SHEET

CLIENT: Avanton

PROJECT TITLE: Former Homebase, Manor Road, Richmond

REPORT TITLE: Response to Stage 1 Decision - Flood Risk, Water and Drainage

PROJECT REFERENCE: 126782

REPORT REFERENCE: 126782-FHT-ZZ-XX-RP-C-0002

Issue & Approval Schedule	ISSUE 1 DRAFT	Name	Signature	Date
	Prepared by	■■■■■		18/04/19
	Checked by	■■■■■		02/05/19
	Approved by	■■■■■■■■■		02/05/19

Revision Record	Rev.	Date	Status	Description	Signature	
	1	20.05.19		Updated to GVA Comments	By	■■■
					Checked	■■■
					Approved	■■■
	2				By	
					Checked	
					Approved	

This document has been prepared in accordance with procedure OP/P02 of the
Fairhurst Quality and Environmental Management System

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1 Introduction

- 1.1.1 This technical note has been prepared in response to the GLA Stage 1 Report for Manor Road, Richmond, to address points raised regarding flood risk, water and drainage, in order that the proposals will be deemed compliant with the London Plan and the draft London Plan.
- 1.1.2 The updated Flood Risk Assessment and Drainage Strategy as referenced to in this Technical Note are included as appendices to this Technical Note.

2 Decision Notice

2.1 Greater London Authority Comments

- 2.1.1 The Greater London Authority (GLA) Development Planning Committee have reviewed the planning application (reference 19/0510/FUL) and returned the comments below with regards to Flood risk, drainage and water.

Flood risk, drainage and water

57 A detailed report on flood risk, drainage and water has been issued under separate cover to the LPA and applicant. The key points requiring action are outlined below.

58 The Flood Risk Assessment provided for the proposed development does not comply with London Plan policy 5.12 and draft London Plan policy SI12, as it does not give appropriate regard to residual flood risks from surface water and groundwater. A full review of flood risk (including residual risks) from all sources of flooding should be provided, and flood resilience and emergency planning measures should be included to manage these risks.

59 The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 and draft policy SI13. The applicant should provide revised additional attenuation storage volume calculations, and exceedance assessment.

60 The proposed development generally meets the requirements of London Plan policy 5.15 and draft London Plan policy SI5.

2.2 Response

Item 57

- 2.2.1 Comment only, no response required.

Item 58 – Surface Water & Groundwater Flooding Residual Risks

- 2.2.2 The risk of surface flooding is addressed in the FRA in section 4.2 where data from the EA was presented and in section 5.2 where it was deemed that there was no probability of flooding from surface water based on the data provided by Thames Water.
- 2.2.3 A section has been added to the FRA which discusses the probability of flooding from groundwater (5.3). Although borehole records exist nearby to the site, groundwater levels vary and it is not possible to properly assess the risk and potential of flooding from groundwater without site specific boreholes and site investigations.
- 2.2.4 Section 7.1 has been added to the FRA which covers mitigation against the risk of flooding by groundwater through limiting the run-off from blue roofs to 1 l/s per building and provision of an exceedance flow path through the site which routes water resulting from groundwater flooding away from the buildings and road adjacent to the site and into areas where any flooding which occurs would leave a safe route

of exit for residents. This is shown on Fairhurst drawing 126782-C-4000 which is included as an Appendix to this document as well as to the FRA.

- 2.2.5 Due to the low risk of surface water flooding, no further resilience or emergency planning measures are considered necessary to protect the development or users of the development.

Item 59

- 2.2.6 The storage volume proposed in the previous revision of the FRA was based on the whole of the non-roof area being hard landscaping to provide a conservative design based on the limited information available at the time of writing.
- 2.2.7 An infiltration coefficient of 0.1 m/hr^1 was used in these calculations as the most conservative estimate for expected soil conditions (gravels) in absence of site specific soakage tests at this stage. To mitigate the risk of no site specific tests being available, an additional 5% as a safety factor was added to the required volume.
- 2.2.8 A review of the storage required has been undertaken;
- The soft landscaping has been measured and the impermeable non roof area has been revised to 0.53ha based on the most up-to-date development plans
 - The infiltration coefficient has been adjusted to be in the mid-range of that for gravel to a value of 0.5 m/hr.
 - The 5% for safety factor has been removed
- 2.2.9 The revised site and calculation methodology has been modelled in MicroDrainage Source Control which results in a storage requirement of 216m³.
- 2.2.10 The revised calculations are provided in Appendix A1 of this Technical Note and as a Appendix A5 of the FRA.
- 2.2.11 Details of the tank sizes and volumes are provided in Appendix A1 of this Technical Note.
- 2.2.12 Fairhurst drawing 126782-C-4000 (provided in Appendix A2 of this Technical Note and A6 of the FRA) shows the updated strategy layout including exceedance routes.

Item 60

- 2.2.13 Comment only, no response required.

3 Stage I Consultation Response

3.1 Comments

- 3.1.1 The Greater London Authority Water Department have further reviewed the application (reference 4796) and returned the additional comments below:

¹ Typical infiltration rates for soil types from CIRIA R156 report.

Flood Risk Management (London Plan Policy 5.12, draft new London Plan Policy SI.12)

Flood Source	Flood Risk
Rivers and the sea	1
Surface water	High
Reservoir	None
Groundwater	Not Assessed
Sewer	Low
Other	N/A

1. The site is in Flood Zone 1 and greater than 1 hectare in area (1.8ha). A Flood Risk Assessment (FRA) has been submitted as required under the NPPF.
2. The FRA considers the risk of flooding from a range of sources, but does not adequately address the residual risk of flooding due to surface water and groundwater. The FRA should address the high risk of surface flooding present within the site, and evaluate the groundwater flooding risk consulting relevant sources such as the borough SFRA.
3. The FRA provides a Sequential Test and Exception Test for the development, as required by the NPPF. The Sequential Test notes that lower vulnerability uses are proposed on lower floors, with more vulnerable uses on higher floors.
4. The Flood Risk Assessment provided for the proposed development does not comply with London Plan policy 5.12 (and draft New London Plan policy SI.12), as it does not give appropriate regard to residual flood risks from Surface water and groundwater. A full review of flood risk (including residual risks) from all sources of flooding should be provided, and flood resilience and emergency planning measures should be included to manage these risks.

Sustainable Drainage (London Plan Policy 5.13, draft new London Plan Policy SI.13)

5. The surface water drainage strategy provides an assessment of existing runoff rates, greenfield runoff rates, and required attenuation storage for a range of post-development discharge rates. Selected discharge rate is 25.2 l/s (Greenfield for 1 in 100yr + Climate Change).
6. The surface water drainage strategy addresses the Drainage Hierarchy, and notes that rainwater harvesting, blue/green roofs, permeable paving, and underground storage tanks would be possible options, and that infiltration is feasible. Measures are shown on plans. This approach does satisfy the requirements of London Plan policy 5.13 (and draft London Plan SI.13). The Applicant is also suggesting trees and we recommend that tree pits are consider for these.
7. The attenuation tank volume has been estimated using a simplified method, which gives an estimated attenuation requirement of 715-962m³. The applicant is proposing a volume of 1020m³, with no further explanation. Proposed volume might be enough, but the selected method is not considered sufficiently accurate to ensure that the specified tank volume will allow discharge rates to be restricted to the desired rate. Applicant should ensure proposed volume is adequate by providing evidence of a suitable method of calculation.
8. No assessment of exceedance flow paths has been provided. Additional information should be provided showing that exceedance flow paths through the site are available in the case of attenuation system blockage or an extreme rainfall event.
9. The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 (and draft policy SI.13). Applicant should provide revised additional attenuation storage volume calculations, and exceedance assessment.

Further comments were included with regards to Water Efficiency which should be addressed by Hoare Lee who are responsible for water supply on the development

3.2 Response

Item 1

- 3.2.1 Comment only, no response required.

Item 2 – Flood Risk Management

- 3.2.2 Refer to paragraphs 2.2.2 to 2.2.4 above which address Item 58 of the GLA Stage 1 Report response and this comment.

Item 3

- 3.2.3 Comment only, no response required.

Item 4 - Flood Risk Management

- 3.2.4 Refer to Item 2 above and paragraphs 2.2.2 to 2.2.4 above which address Item 58 of the GLA Stage 1 Report response and this comment.

Item 5

- 3.2.5 Comment only, no response required.

Item 6

- 3.2.6 Comment only, no response required.

Item 7 – Attenuation Volume

- 3.2.7 Refer to paragraphs 2.2.6 to 2.2.11 above which address Item 59 of the GLA Stage 1 Report response and this comment.


Item 8 – Exceedance Flow Paths

- 3.2.8 Refer to Fairhurst Drawing 126782-C-4000 included as an appendix to this Technical Note which has been updated to include exceedance flow routes. It should be noted the drainage network is designed to have sufficient capacity to fully contain all storms up to and including the 100yr + climate change storm. These routes are for any storms more severe than this only.

Item 9 – Attenuation Volume

- 3.2.9 Refer to Item 7 and 8 above and paragraphs 2.2.6 to 2.2.11 above which address Item 59 of the GLA Stage 1 Report response and this comment.

A.1 MicroDrainage and Surface Water Attenuation Calculations

Fairhurst		Page 1
135 Park Street	126782	
London	Manor Road	
SE1 9EA	Richmond	
Date 20/05/2019	Designed by [REDACTED]	
File 126782 - DETAILED SOURCE CONTRO...	Checked by [REDACTED]	
XP Solutions	Source Control 2018.1	

Summary of Results for 100 year Return Period (+35%)

Half Drain Time : 95 minutes.


Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Volume (m³)	Status
15 min Summer	5.475	0.475	18.8	121.9	O K
30 min Summer	5.594	0.594	18.8	152.4	O K
60 min Summer	5.671	0.671	18.8	172.1	O K
120 min Summer	5.669	0.669	18.8	171.6	O K
180 min Summer	5.633	0.633	18.8	162.3	O K
240 min Summer	5.596	0.596	18.8	153.0	O K
360 min Summer	5.526	0.526	18.8	134.9	O K
480 min Summer	5.462	0.462	18.8	118.6	O K
600 min Summer	5.403	0.403	18.8	103.3	O K
720 min Summer	5.348	0.348	18.8	89.2	O K
960 min Summer	5.252	0.252	18.8	64.6	O K
1440 min Summer	5.119	0.119	18.8	30.6	O K
2160 min Summer	5.049	0.049	18.3	12.5	O K
2880 min Summer	5.041	0.041	15.5	10.6	O K
4320 min Summer	5.033	0.033	12.5	8.6	O K
5760 min Summer	5.029	0.029	11.0	7.5	O K
7200 min Summer	5.027	0.027	10.0	6.8	O K
8640 min Summer	5.025	0.025	9.3	6.3	O K
10080 min Summer	5.023	0.023	8.7	6.0	O K
15 min Winter	5.538	0.538	18.8	138.1	O K
30 min Winter	5.676	0.676	18.8	173.5	O K
60 min Winter	5.773	0.773	18.8	198.3	O K
120 min Winter	5.789	0.789	18.8	202.3	O K
180 min Winter	5.741	0.741	18.8	190.1	O K
240 min Winter	5.693	0.693	18.8	177.7	O K
360 min Winter	5.590	0.590	18.8	151.5	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Time-Peak (mins)
15 min Summer	138.813	0.0	24
30 min Summer	89.321	0.0	37
60 min Summer	54.688	0.0	64
120 min Summer	32.384	0.0	112
180 min Summer	23.552	0.0	142
240 min Summer	18.697	0.0	174
360 min Summer	13.427	0.0	242
480 min Summer	10.624	0.0	308
600 min Summer	8.854	0.0	374
720 min Summer	7.626	0.0	436
960 min Summer	6.022	0.0	558
1440 min Summer	4.311	0.0	782
2160 min Summer	3.083	0.0	1100
2880 min Summer	2.428	0.0	1468
4320 min Summer	1.732	0.0	2204
5760 min Summer	1.362	0.0	2888
7200 min Summer	1.130	0.0	3656
8640 min Summer	0.970	0.0	4280
10080 min Summer	0.852	0.0	4976
15 min Winter	138.813	0.0	24
30 min Winter	89.321	0.0	38
60 min Winter	54.688	0.0	64
120 min Winter	32.384	0.0	118
180 min Winter	23.552	0.0	152
240 min Winter	18.697	0.0	188
360 min Winter	13.427	0.0	262

Summary of Results for 100 year Return Period (+35%)

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Volume (m³)	Status
480 min Winter	5.494	0.494	18.8	126.7	O K
600 min Winter	5.404	0.404	18.8	103.6	O K
720 min Winter	5.321	0.321	18.8	82.4	O K
960 min Winter	5.183	0.183	18.8	47.1	O K
1440 min Winter	5.049	0.049	18.5	12.6	O K
2160 min Winter	5.039	0.039	14.7	10.0	O K
2880 min Winter	5.034	0.034	12.7	8.6	O K
4320 min Winter	5.028	0.028	10.4	7.1	O K
5760 min Winter	5.025	0.025	9.3	6.3	O K
7200 min Winter	5.023	0.023	8.5	5.8	O K
8640 min Winter	5.022	0.022	8.2	5.5	O K
10080 min Winter	5.021	0.021	7.8	5.3	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Time-Peak (mins)
480 min Winter	10.624	0.0	334
600 min Winter	8.854	0.0	402
720 min Winter	7.626	0.0	464
960 min Winter	6.022	0.0	580
1440 min Winter	4.311	0.0	736
2160 min Winter	3.083	0.0	1104
2880 min Winter	2.428	0.0	1436
4320 min Winter	1.732	0.0	2204
5760 min Winter	1.362	0.0	2904
7200 min Winter	1.130	0.0	3672
8640 min Winter	0.970	0.0	4408
10080 min Winter	0.852	0.0	4920

Fairhurst		Page 3
135 Park Street London SE1 9EA	126782 Manor Road Richmond	
Date 20/05/2019	Designed by [REDACTED]	
File 126782 - DETAILED SOURCE CONTRO...	Checked by [REDACTED]	
XP Solutions		Source Control 2018.1

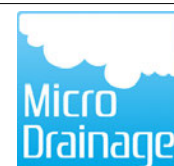
Rainfall Details

Rainfall Model	FSR	Winter Storms	Yes
Return Period (years)	100	Cv (Summer)	0.750
Region	England and Wales	Cv (Winter)	0.840
M5-60 (mm)	20.000	Shortest Storm (mins)	15
Ratio R	0.450	Longest Storm (mins)	10080
Summer Storms	Yes	Climate Change %	+35

Time Area Diagram

Total Area (ha) 0.530

Time (mins)	Area	Time (mins)	Area	Time (mins)	Area
From:	To:	From:	To:	From:	To:
	(ha)		(ha)		(ha)
0	4 0.177	4	8 0.177	8	12 0.177

Fairhurst		Page 4
135 Park Street	126782	
London	Manor Road	
SE1 9EA	Richmond	
Date 20/05/2019	Designed by [REDACTED]	
File 126782 - DETAILED SOURCE CONTRO...	Checked by [REDACTED]	
XP Solutions	Source Control 2018.1	

Model Details

Storage is Online Cover Level (m) 7.000

Cellular Storage Structure

Invert Level (m) 5.000 Safety Factor 2.0
Infiltration Coefficient Base (m/hr) 0.50000 Porosity 0.95
Infiltration Coefficient Side (m/hr) 0.50000

Depth (m)	Area (m²)	Inf. Area (m²)	Depth (m)	Area (m²)	Inf. Area (m²)	Depth (m)	Area (m²)	Inf. Area (m²)
0.000	270.0	270.0	0.800	270.0	270.0	0.801	0.0	270.0

Additional Hydrograph #1

Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)
10	5.0	620	5.0	1230	5.0	1840	5.0	2450	5.0	3060	5.0	3670	5.0	4280	5.0
20	5.0	630	5.0	1240	5.0	1850	5.0	2460	5.0	3070	5.0	3680	5.0	4290	5.0
30	5.0	640	5.0	1250	5.0	1860	5.0	2470	5.0	3080	5.0	3690	5.0	4300	5.0
40	5.0	650	5.0	1260	5.0	1870	5.0	2480	5.0	3090	5.0	3700	5.0	4310	5.0
50	5.0	660	5.0	1270	5.0	1880	5.0	2490	5.0	3100	5.0	3710	5.0	4320	5.0
60	5.0	670	5.0	1280	5.0	1890	5.0	2500	5.0	3110	5.0	3720	5.0	4330	5.0
70	5.0	680	5.0	1290	5.0	1900	5.0	2510	5.0	3120	5.0	3730	5.0	4340	5.0
80	5.0	690	5.0	1300	5.0	1910	5.0	2520	5.0	3130	5.0	3740	5.0	4350	5.0
90	5.0	700	5.0	1310	5.0	1920	5.0	2530	5.0	3140	5.0	3750	5.0	4360	5.0
100	5.0	710	5.0	1320	5.0	1930	5.0	2540	5.0	3150	5.0	3760	5.0	4370	5.0
110	5.0	720	5.0	1330	5.0	1940	5.0	2550	5.0	3160	5.0	3770	5.0	4380	5.0
120	5.0	730	5.0	1340	5.0	1950	5.0	2560	5.0	3170	5.0	3780	5.0	4390	5.0
130	5.0	740	5.0	1350	5.0	1960	5.0	2570	5.0	3180	5.0	3790	5.0	4400	5.0
140	5.0	750	5.0	1360	5.0	1970	5.0	2580	5.0	3190	5.0	3800	5.0	4410	5.0
150	5.0	760	5.0	1370	5.0	1980	5.0	2590	5.0	3200	5.0	3810	5.0	4420	5.0
160	5.0	770	5.0	1380	5.0	1990	5.0	2600	5.0	3210	5.0	3820	5.0	4430	5.0
170	5.0	780	5.0	1390	5.0	2000	5.0	2610	5.0	3220	5.0	3830	5.0	4440	5.0
180	5.0	790	5.0	1400	5.0	2010	5.0	2620	5.0	3230	5.0	3840	5.0	4450	5.0
190	5.0	800	5.0	1410	5.0	2020	5.0	2630	5.0	3240	5.0	3850	5.0	4460	5.0
200	5.0	810	5.0	1420	5.0	2030	5.0	2640	5.0	3250	5.0	3860	5.0	4470	5.0
210	5.0	820	5.0	1430	5.0	2040	5.0	2650	5.0	3260	5.0	3870	5.0	4480	5.0
220	5.0	830	5.0	1440	5.0	2050	5.0	2660	5.0	3270	5.0	3880	5.0	4490	5.0
230	5.0	840	5.0	1450	5.0	2060	5.0	2670	5.0	3280	5.0	3890	5.0	4500	5.0
240	5.0	850	5.0	1460	5.0	2070	5.0	2680	5.0	3290	5.0	3900	5.0	4510	5.0
250	5.0	860	5.0	1470	5.0	2080	5.0	2690	5.0	3300	5.0	3910	5.0	4520	5.0
260	5.0	870	5.0	1480	5.0	2090	5.0	2700	5.0	3310	5.0	3920	5.0	4530	5.0
270	5.0	880	5.0	1490	5.0	2100	5.0	2710	5.0	3320	5.0	3930	5.0	4540	5.0
280	5.0	890	5.0	1500	5.0	2110	5.0	2720	5.0	3330	5.0	3940	5.0	4550	5.0
290	5.0	900	5.0	1510	5.0	2120	5.0	2730	5.0	3340	5.0	3950	5.0	4560	5.0
300	5.0	910	5.0	1520	5.0	2130	5.0	2740	5.0	3350	5.0	3960	5.0	4570	5.0
310	5.0	920	5.0	1530	5.0	2140	5.0	2750	5.0	3360	5.0	3970	5.0	4580	5.0
320	5.0	930	5.0	1540	5.0	2150	5.0	2760	5.0	3370	5.0	3980	5.0	4590	5.0
330	5.0	940	5.0	1550	5.0	2160	5.0	2770	5.0	3380	5.0	3990	5.0	4600	5.0
340	5.0	950	5.0	1560	5.0	2170	5.0	2780	5.0	3390	5.0	4000	5.0	4610	5.0
350	5.0	960	5.0	1570	5.0	2180	5.0	2790	5.0	3400	5.0	4010	5.0	4620	5.0
360	5.0	970	5.0	1580	5.0	2190	5.0	2800	5.0	3410	5.0	4020	5.0	4630	5.0
370	5.0	980	5.0	1590	5.0	2200	5.0	2810	5.0	3420	5.0	4030	5.0	4640	5.0
380	5.0	990	5.0	1600	5.0	2210	5.0	2820	5.0	3430	5.0	4040	5.0	4650	5.0
390	5.0	1000	5.0	1610	5.0	2220	5.0	2830	5.0	3440	5.0	4050	5.0	4660	5.0
400	5.0	1010	5.0	1620	5.0	2230	5.0	2840	5.0	3450	5.0	4060	5.0	4670	5.0
410	5.0	1020	5.0	1630	5.0	2240	5.0	2850	5.0	3460	5.0	4070	5.0	4680	5.0
420	5.0	1030	5.0	1640	5.0	2250	5.0	2860	5.0	3470	5.0	4080	5.0	4690	5.0
430	5.0	1040	5.0	1650	5.0	2260	5.0	2870	5.0	3480	5.0	4090	5.0	4700	5.0
440	5.0	1050	5.0	1660	5.0	2270	5.0	2880	5.0	3490	5.0	4100	5.0	4710	5.0
450	5.0	1060	5.0	1670	5.0	2280	5.0	2890	5.0	3500	5.0	4110	5.0	4720	5.0
460	5.0	1070	5.0	1680	5.0	2290	5.0	2900	5.0	3510	5.0	4120	5.0	4730	5.0
470	5.0	1080	5.0	1690	5.0	2300	5.0	2910	5.0	3520	5.0	4130	5.0	4740	5.0
480	5.0	1090	5.0	1700	5.0	2310	5.0	2920	5.0	3530	5.0	4140	5.0	4750	5.0
490	5.0	1100	5.0	1710	5.0	2320	5.0	2930	5.0	3540	5.0	4150	5.0	4760	5.0
500	5.0	1110	5.0	1720	5.0	2330	5.0	2940	5.0	3550	5.0	4160	5.0	4770	5.0
510	5.0	1120	5.0	1730	5.0	2340	5.0	2950	5.0	3560	5.0	4170	5.0	4780	5.0
520	5.0	1130	5.0	1740	5.0	2350	5.0	2960	5.0	3570	5.0	4180	5.0	4790	5.0
530	5.0	1140	5.0	1750	5.0	2360	5.0	2970	5.0	3580	5.0	4190	5.0	4800	5.0
540	5.0	1150	5.0	1760	5.0	2370	5.0	2980	5.0	3590	5.0	4200	5.0	4810	5.0
550	5.0	1160	5.0	1770	5.0	2380	5.0	2990	5.0	3600	5.0	4210	5.0	4820	5.0
560	5.0	1170	5.0	1780	5.0	2390	5.0	3000	5.0	3610	5.0	4220	5.0	4830	5.0
570	5.0	1180	5.0	1790	5.0	2400	5.0	3010	5.0	3620	5.0	4230	5.0	4840	5.0
580	5.0	1190	5.0	1800	5.0	2410	5.0	3020	5.0	3630	5.0	4240	5.0	4850	5.0
590	5.0	1200	5.0	1810	5.0	2420	5.0	3030	5.0	3640	5.0	4250	5.0	4860	5.0
600	5.0	1210	5.0	1820	5.0	2430	5.0	3040	5.0	3650	5.0	4260	5.0	4870	5.0
610	5.0	1220	5.0	1830	5.0	2440	5.0	3050	5.0	3660	5.0	4270	5.0	4880	5.0



Additional Hydrograph #1

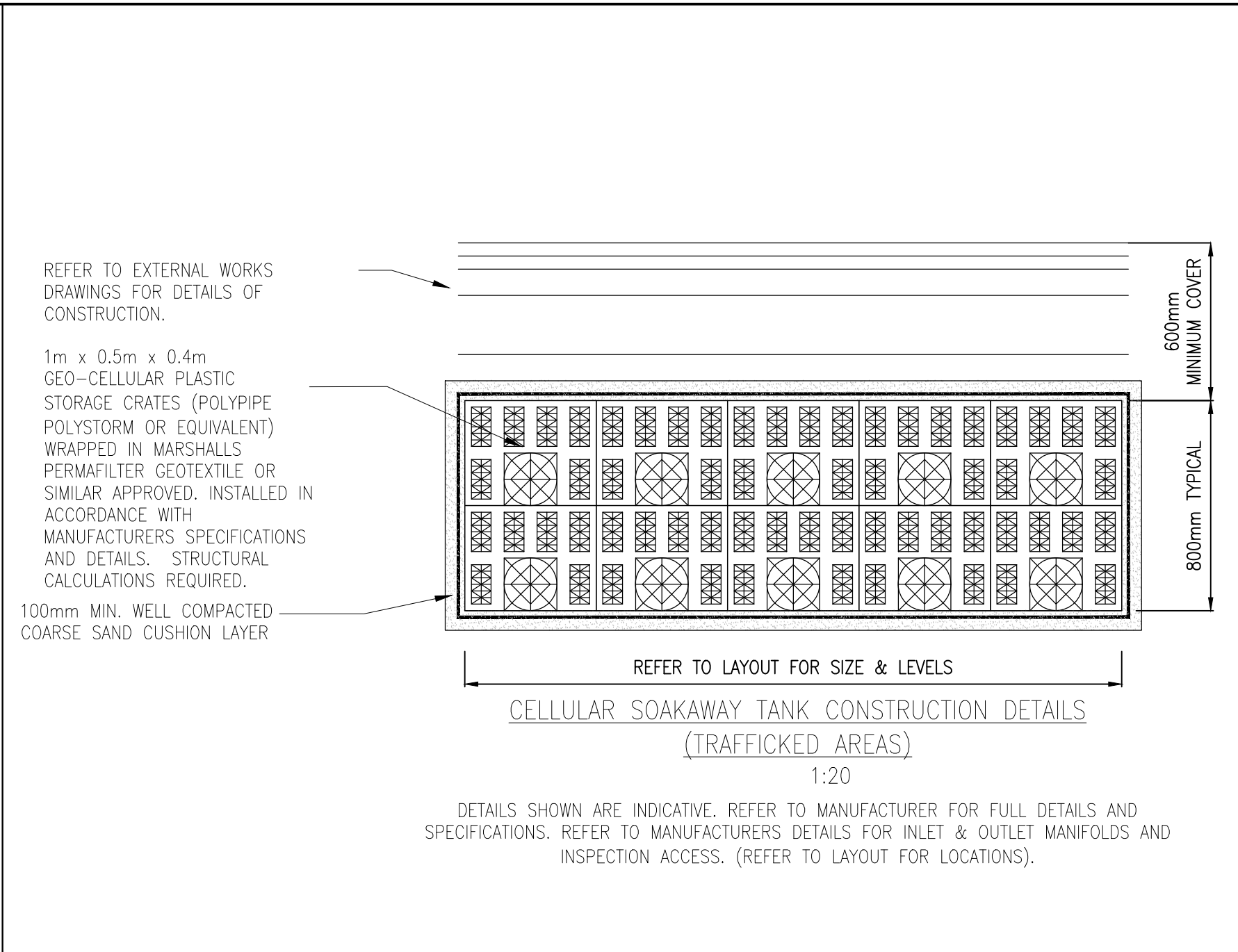
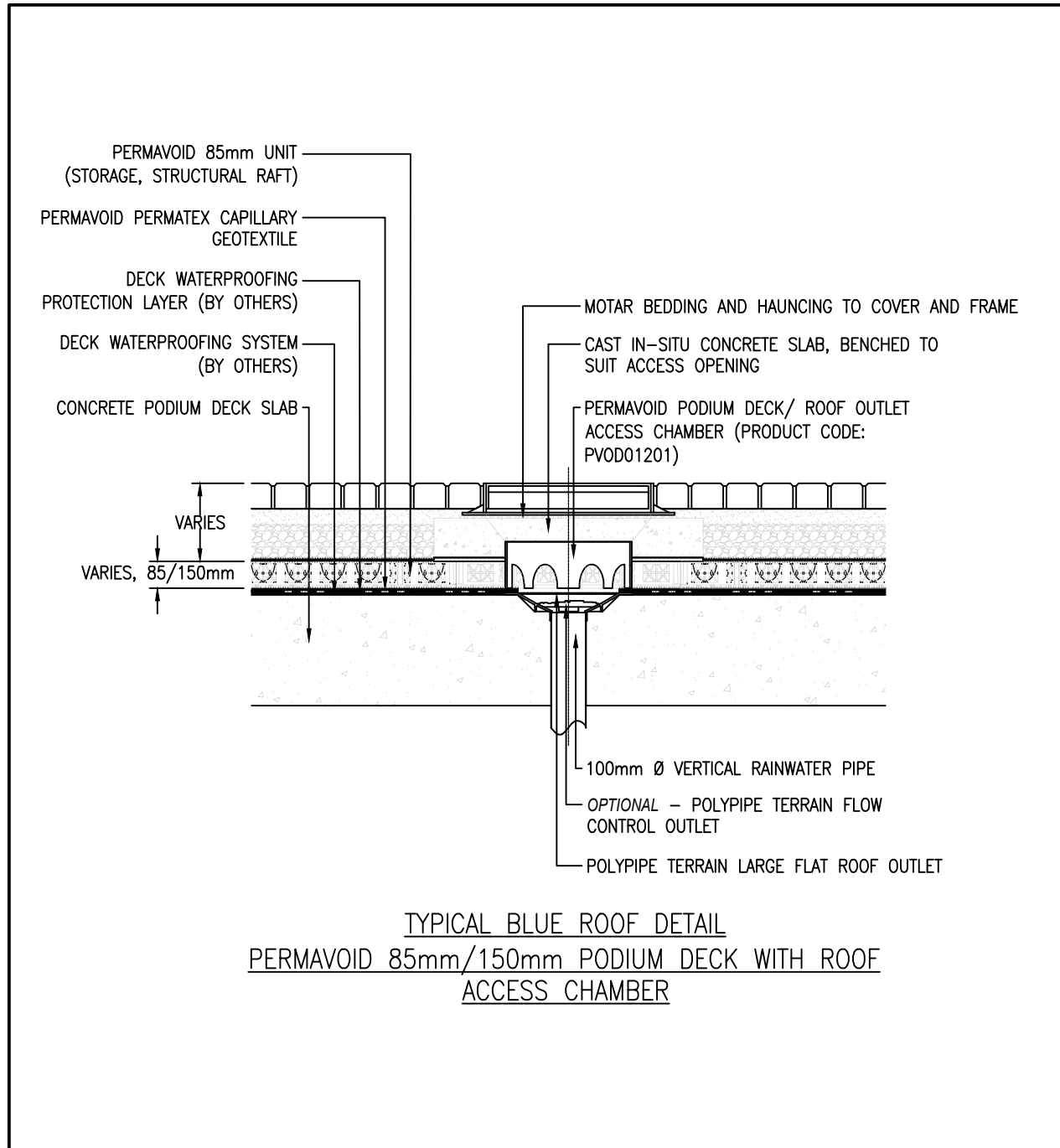
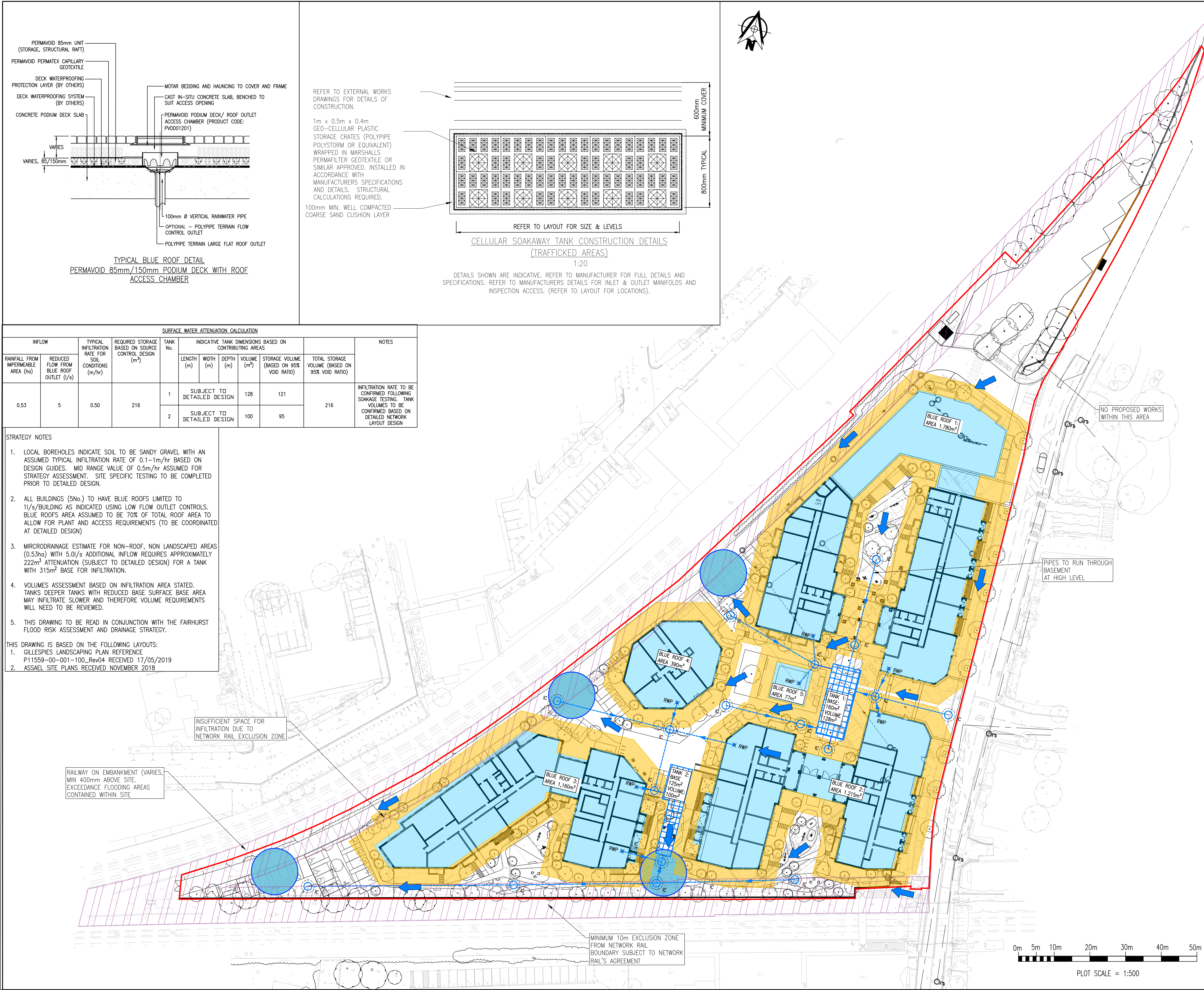
Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)
4890	5.0	5500	5.0	6110	5.0	6720	5.0	7330	5.0	7940	5.0	8550	5.0	9160	5.0
4900	5.0	5510	5.0	6120	5.0	6730	5.0	7340	5.0	7950	5.0	8560	5.0	9170	5.0
4910	5.0	5520	5.0	6130	5.0	6740	5.0	7350	5.0	7960	5.0	8570	5.0	9180	5.0
4920	5.0	5530	5.0	6140	5.0	6750	5.0	7360	5.0	7970	5.0	8580	5.0	9190	5.0
4930	5.0	5540	5.0	6150	5.0	6760	5.0	7370	5.0	7980	5.0	8590	5.0	9200	5.0
4940	5.0	5550	5.0	6160	5.0	6770	5.0	7380	5.0	7990	5.0	8600	5.0	9210	5.0
4950	5.0	5560	5.0	6170	5.0	6780	5.0	7390	5.0	8000	5.0	8610	5.0	9220	5.0
4960	5.0	5570	5.0	6180	5.0	6790	5.0	7400	5.0	8010	5.0	8620	5.0	9230	5.0
4970	5.0	5580	5.0	6190	5.0	6800	5.0	7410	5.0	8020	5.0	8630	5.0	9240	5.0
4980	5.0	5590	5.0	6200	5.0	6810	5.0	7420	5.0	8030	5.0	8640	5.0	9250	5.0
4990	5.0	5600	5.0	6210	5.0	6820	5.0	7430	5.0	8040	5.0	8650	5.0	9260	5.0
5000	5.0	5610	5.0	6220	5.0	6830	5.0	7440	5.0	8050	5.0	8660	5.0	9270	5.0
5010	5.0	5620	5.0	6230	5.0	6840	5.0	7450	5.0	8060	5.0	8670	5.0	9280	5.0
5020	5.0	5630	5.0	6240	5.0	6850	5.0	7460	5.0	8070	5.0	8680	5.0	9290	5.0
5030	5.0	5640	5.0	6250	5.0	6860	5.0	7470	5.0	8080	5.0	8690	5.0	9300	5.0
5040	5.0	5650	5.0	6260	5.0	6870	5.0	7480	5.0	8090	5.0	8700	5.0	9310	5.0
5050	5.0	5660	5.0	6270	5.0	6880	5.0	7490	5.0	8100	5.0	8710	5.0	9320	5.0
5060	5.0	5670	5.0	6280	5.0	6890	5.0	7500	5.0	8110	5.0	8720	5.0	9330	5.0
5070	5.0	5680	5.0	6290	5.0	6900	5.0	7510	5.0	8120	5.0	8730	5.0	9340	5.0
5080	5.0	5690	5.0	6300	5.0	6910	5.0	7520	5.0	8130	5.0	8740	5.0	9350	5.0
5090	5.0	5700	5.0	6310	5.0	6920	5.0	7530	5.0	8140	5.0	8750	5.0	9360	5.0
5100	5.0	5710	5.0	6320	5.0	6930	5.0	7540	5.0	8150	5.0	8760	5.0	9370	5.0
5110	5.0	5720	5.0	6330	5.0	6940	5.0	7550	5.0	8160	5.0	8770	5.0	9380	5.0
5120	5.0	5730	5.0	6340	5.0	6950	5.0	7560	5.0	8170	5.0	8780	5.0	9390	5.0
5130	5.0	5740	5.0	6350	5.0	6960	5.0	7570	5.0	8180	5.0	8790	5.0	9400	5.0
5140	5.0	5750	5.0	6360	5.0	6970	5.0	7580	5.0	8190	5.0	8800	5.0	9410	5.0
5150	5.0	5760	5.0	6370	5.0	6980	5.0	7590	5.0	8200	5.0	8810	5.0	9420	5.0
5160	5.0	5770	5.0	6380	5.0	6990	5.0	7600	5.0	8210	5.0	8820	5.0	9430	5.0
5170	5.0	5780	5.0	6390	5.0	7000	5.0	7610	5.0	8220	5.0	8830	5.0	9440	5.0
5180	5.0	5790	5.0	6400	5.0	7010	5.0	7620	5.0	8230	5.0	8840	5.0	9450	5.0
5190	5.0	5800	5.0	6410	5.0	7020	5.0	7630	5.0	8240	5.0	8850	5.0	9460	5.0
5200	5.0	5810	5.0	6420	5.0	7030	5.0	7640	5.0	8250	5.0	8860	5.0	9470	5.0
5210	5.0	5820	5.0	6430	5.0	7040	5.0	7650	5.0	8260	5.0	8870	5.0	9480	5.0
5220	5.0	5830	5.0	6440	5.0	7050	5.0	7660	5.0	8270	5.0	8880	5.0	9490	5.0
5230	5.0	5840	5.0	6450	5.0	7060	5.0	7670	5.0	8280	5.0	8890	5.0	9500	5.0
5240	5.0	5850	5.0	6460	5.0	7070	5.0	7680	5.0	8290	5.0	8900	5.0	9510	5.0
5250	5.0	5860	5.0	6470	5.0	7080	5.0	7690	5.0	8300	5.0	8910	5.0	9520	5.0
5260	5.0	5870	5.0	6480	5.0	7090	5.0	7700	5.0	8310	5.0	8920	5.0	9530	5.0
5270	5.0	5880	5.0	6490	5.0	7100	5.0	7710	5.0	8320	5.0	8930	5.0	9540	5.0
5280	5.0	5890	5.0	6500	5.0	7110	5.0	7720	5.0	8330	5.0	8940	5.0	9550	5.0
5290	5.0	5900	5.0	6510	5.0	7120	5.0	7730	5.0	8340	5.0	8950	5.0	9560	5.0
5300	5.0	5910	5.0	6520	5.0	7130	5.0	7740	5.0	8350	5.0	8960	5.0	9570	5.0
5310	5.0	5920	5.0	6530	5.0	7140	5.0	7750	5.0	8360	5.0	8970	5.0	9580	5.0
5320	5.0	5930	5.0	6540	5.0	7150	5.0	7760	5.0	8370	5.0	8980	5.0	9590	5.0
5330	5.0	5940	5.0	6550	5.0	7160	5.0	7770	5.0	8380	5.0	8990	5.0	9600	5.0
5340	5.0	5950	5.0	6560	5.0	7170	5.0	7780	5.0	8390	5.0	9000	5.0	9610	5.0
5350	5.0	5960	5.0	6570	5.0	7180	5.0	7790	5.0	8400	5.0	9010	5.0	9620	5.0
5360	5.0	5970	5.0	6580	5.0	7190	5.0	7800	5.0	8410	5.0	9020	5.0	9630	5.0
5370	5.0	5980	5.0	6590	5.0	7200	5.0	7810	5.0	8420	5.0	9030	5.0	9640	5.0
5380	5.0	5990	5.0	6600	5.0	7210	5.0	7820	5.0	8430	5.0	9040	5.0	9650	5.0
5390	5.0	6000	5.0	6610	5.0	7220	5.0	7830	5.0	8440	5.0	9050	5.0	9660	5.0
5400	5.0	6010	5.0	6620	5.0	7230	5.0	7840	5.0	8450	5.0	9060	5.0	9670	5.0
5410	5.0	6020	5.0	6630	5.0	7240	5.0	7850	5.0	8460	5.0	9070	5.0	9680	5.0
5420	5.0	6030	5.0	6640	5.0	7250	5.0	7860	5.0	8470	5.0	9080	5.0	9690	5.0
5430	5.0	6040	5.0	6650	5.0	7260	5.0	7870	5.0	8480	5.0	9090	5.0	9700	5.0
5440	5.0	6050	5.0	6660	5.0	7270	5.0	7880	5.0	8490	5.0	9100	5.0	9710	5.0
5450	5.0	6060	5.0	6670	5.0	7280	5.0	7890	5.0	8500	5.0	9110	5.0	9720	5.0
5460	5.0	6070	5.0	6680	5.0	7290	5.0	7900	5.0	8510	5.0	9120	5.0	9730	5.0
5470	5.0	6080	5.0	6690	5.0	7300	5.0	7910	5.0	8520	5.0	9130	5.0	9740	5.0
5480	5.0	6090	5.0	6700	5.0	7310	5.0	7920	5.0	8530	5.0	9140	5.0	9750	5.0
5490	5.0	6100	5.0	6710	5.0	7320	5.0	7930	5.0	8540	5.0	9150	5.0	9760	5.0

Additional Hydrograph #1

Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)	Time (mins)	Flow (l/s)
9770	5.0	9810	5.0	9850	5.0	9890	5.0	9930	5.0	9970	5.0	10010	5.0	10050	5.0
9780	5.0	9820	5.0	9860	5.0	9900	5.0	9940	5.0	9980	5.0	10020	5.0	10060	5.0
9790	5.0	9830	5.0	9870	5.0	9910	5.0	9950	5.0	9990	5.0	10030	5.0	10070	5.0
9800	5.0	9840	5.0	9880	5.0	9920	5.0	9960	5.0	10000	5.0	10040	5.0	10080	5.0

A.2 Drawings

- 126782-C-4000 – Preliminary Drainage Strategy



SURFACE WATER ATTENUATION CALCULATION										
INFLOW		TYPICAL INFILTRATION RATE FOR SOIL CONDITIONS (m/hr)	REQUIRED STORAGE BASED ON SOURCE CONTROL DESIGN (m³)	TANK No.	INDICATIVE TANK DIMENSIONS BASED ON CONTRIBUTING AREAS				NOTES	
RAINFALL FROM IMPERMEABLE AREA (ha)	REDUCED FLOW FROM BLUE ROOF OUTLET (l/s)				LENGTH (m)	WIDTH (m)	DEPTH (m)	VOLUME (m³)		STORAGE VOLUME (BASED ON 95% VOID RATIO)
0.53	5	0.50	216	1	SUBJECT TO DETAILED DESIGN			128	121	INFILTRATION RATE TO BE CONFIRMED FOLLOWING SOAKAGE TESTING. TANK VOLUMES TO BE CONFIRMED BASED ON DETAILED NETWORK LAYOUT DESIGN
				2	SUBJECT TO DETAILED DESIGN			100	95	
										216

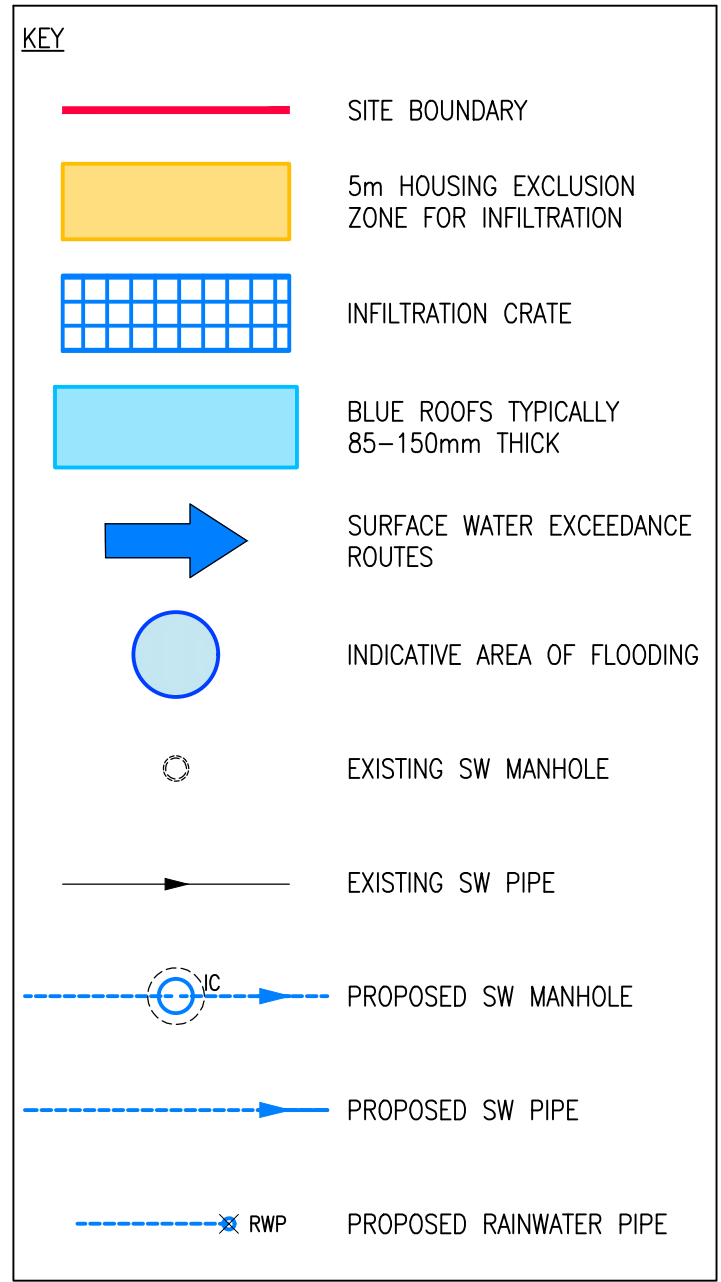
STRATEGY NOTES

1. LOCAL BOREHOLES INDICATE SOIL TO BE SANDY GRAVEL WITH AN ASSUMED TYPICAL INFILTRATION RATE OF 0.1-1m/hr BASED ON DESIGN GUIDES. MID RANGE VALUE OF 0.5m/hr ASSUMED FOR STRATEGY ASSESSMENT. SITE SPECIFIC TESTING TO BE COMPLETED PRIOR TO DETAILED DESIGN.
2. ALL BUILDINGS (5No.) TO HAVE BLUE ROOFS LIMITED TO 1l/s/BUILDING AS INDICATED USING LOW FLOW OUTLET CONTROLS. BLUE ROOFS AREA ASSUMED TO BE 70% OF TOTAL ROOF AREA TO ALLOW FOR PLANT AND ACCESS REQUIREMENTS (TO BE COORDINATED AT DETAILED DESIGN)
3. MICRODRAINAGE ESTIMATE FOR NON-ROOF, NON LANDSCAPED AREAS (0.53ha) WITH 5.0l/s ADDITIONAL INFLOW REQUIRES APPROXIMATELY 222m³ ATTENUATION (SUBJECT TO DETAILED DESIGN) FOR A TANK WITH 315m² BASE FOR INFILTRATION.
4. VOLUMES ASSESSMENT BASED ON INFILTRATION AREA STATED. TANKS DEEPER TANKS WITH REDUCED BASE SURFACE BASE AREA MAY INFILTRATE SLOWER AND THEREFORE VOLUME REQUIREMENTS WILL NEED TO BE REVIEWED.
5. THIS DRAWING TO BE READ IN CONJUNCTION WITH THE FAIRHURST FLOOD RISK ASSESSMENT AND DRAINAGE STRATEGY.

THIS DRAWING IS BASED ON THE FOLLOWING LAYOUTS:

1. GILLESPIES LANDSCAPING PLAN REFERENCE P11559-00-001-100_Rev04 RECEIVED 17/05/2019
2. ASSAEL SITE PLANS RECEIVED NOVEMBER 2018

- NOTES:
1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE RELEVANT SPECIFICATION, INC. RISK ASSESSMENTS (SEE CDM NOTES) AND ALL OTHER RELATED DRAWINGS ISSUED BY THE ENGINEER.
 2. DO NOT SCALE FROM THIS DRAWING. WORK FROM FIGURED DIMENSIONS ONLY.
 3. ALL DIMENSIONS SHOWN ON THIS DRAWING ARE IN METRES UNLESS OTHERWISE STATED.
 4. ALL DIMENSIONS, LEVELS AND SURVEY GRID CO-ORDINATES ARE TO BE CHECKED ON SITE AND THE ENGINEER NOTIFIED IMMEDIATELY OF ANY DISCREPANCIES PRIOR TO THE COMMENCEMENT OF THE WORKS.
 5. NO DEVIATION FROM THE DETAILS SHOWN ON THIS DRAWING IS PERMITTED WITHOUT PRIOR PERMISSION FROM THE ENGINEER.
 6. ANY WORKS OUTSIDE SITE BOUNDARY ARE FOR INFORMATION PURPOSES ONLY. UNLESS SPECIFICALLY NOTED, ALL WORKS OUTSIDE THE SITE BOUNDARY WILL BE UNDERTAKEN BY OTHERS UNDER A SEPARATE CONTRACT.
 7. THE CONTRACTOR SHALL UNDERTAKE SUCH MATERIALS TESTING AS INDICATED IN THE SPECIFICATIONS AND SHALL INCLUDE THE COST OF TESTING IN THE TENDER.
 8. TOTAL SITE AREA = 1.65ha
TOTAL NON ROOF AREA = 1ha
TOTAL NON PERMEABLE NON ROOF AREA = 0.53ha



P05	20/05/19	SITE LANDSCAPE LAYOUT UPDATED AND ATTENUATION UPDATED TO SUIT NEW LANDSCAPING AREAS	CD	AP	AC
P04	07/05/19	SURFACE WATER EXCEEDANCE ROUTE, FLOODING AREAS, GREEN ROOF AREAS AND TANK VOLUMES AND CALCS ADDED	IJ	AP	AC
P03	14/12/18	SITE LAYOUT UPDATED	CD	AP	AC
P02	21/11/18	KEY AMENDED	CD	AP	AC
P01	20/11/18	ISSUED FOR INFORMATION	CD	AP	AC
Rev.	Date	Description	Drawn	Chkd	Appd.

AVANTON
135 Park Street
LONDON
SE1 9EA
Tel: 020 7828 8205
Fax: 084 4381 4412
Fairhurst.co.uk

Project Title:

FORMER HOMEBASE
MANOR ROAD
RICHMOND

Drawing Title:

PRELIMINARY SURFAE WATER
DRAINAGE STRATEGY

Scale at A1: 1:500	Status: DISCUSSION	Fairhurst Project No: 126782
Drawn: AP	Checked: AP	Approved: AC
Date: NOV 18	Date: NOV 18	Date: NOV 18
Drawing No.: 126782-C-4000	Revision: P05	

A.3 Flood Risk Assessment

- 126782-XX-C001 - Flood Risk Assessment

Civil Engineering • Structural Engineering • Transportation • Roads & Bridges Ports & Harbours • Geotechnical & Environmental Engineering • Planning & Development • Water Services • CDM Coordinator Services

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Aberdeen Leeds
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Edinburgh Sevenoaks
Elgin Sheffield
Glasgow Taunton
Inverness Watford

FAIRHURST

[REDACTED]

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 03 May 2019 12:45
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK)
Subject: RE: 4795 - Homebase
Attachments: Affordable Housing Statement_Homebase Manor Road.pdf

Hi [REDACTED]
Please find attached the Affordable Housing Statement.
Kind regards,

[REDACTED]
Principal Planner

D +44 (0)20 [REDACTED]
M +44 (0) [REDACTED]
avisonyoung.co.uk

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 03 May 2019 11:54
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK); [REDACTED] (Avison Young - UK)
Subject: RE: 4795 - Homebase

External Sender

External Sender

Great, thanks.
NB I am on leave from COB returning 14 May 2019 so no immediate rush as I will pick it up on my return.
Thanks

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 03 May 2019 11:39
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>; [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Subject: Re: 4795 - Homebase

Hi [REDACTED]
Thanks for your email. I've copied in [REDACTED] who will be able to send across the Affordable Housing Statement.
We note your comments about the affordable rent levels and are reviewing this with our client.
Best wishes

[REDACTED]
Associate
Avison Young
T +44 (0)20 [REDACTED] | M +44 (0)75 [REDACTED]
[REDACTED] avisonyoung.com | www.avisonyoung.co.uk

65 Gresham Street, London, EC2V 7NQ

On 3 May 2019, at 10:51, [REDACTED] <[REDACTED]@london.gov.uk> wrote:

External Sender

External Sender

Hi [REDACTED]

I am just reviewing the affordable housing position on the scheme and can't seem to locate the affordable housing statement that is stated as a submitted document.

Can you send this over please? I am interested in the habitable room calculations specifically in order to verify proposals.

Also, I would point out one of the key elements of securing Fast Track will be revisions to the offer to bring it in line with the Mayor's preferred rental levels. The Richmond Affordable Rent levels are not suitable.

Kind regards

[REDACTED]

Senior Strategic Planner

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7084 [REDACTED] | [REDACTED]

www.london.gov.uk/what-we-do/planning

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

[REDACTED]

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 15 April 2019 15:07
To: [REDACTED]
Cc: [REDACTED] (Avison Young - UK)
Subject: RE: Homebase Manor Road 19/0510/FUL

Hi [REDACTED]
Thank you for sending these. I have passed them on to the relevant consultants and we will respond as soon as possible.
Kind regards,

[REDACTED]
Principal Planner

D +44 (0)20 [REDACTED]
M +44 (0) [REDACTED]
avisonyoung.co.uk

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 15 April 2019 14:29
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK)
Subject: RE: Homebase Manor Road 19/0510/FUL
EXTERNAL SENDER

[REDACTED]
Please find attached the detailed water and energy comments for our internal teams which will be summarised in the stage I report when issued. There are some points that need to be considered and responded to.
Kind regards

[REDACTED]

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 15 April 2019 14:16
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Subject: RE: Homebase Manor Road 19/0510/FUL

Hi [REDACTED]
Thank you for confirming.
Kind regards,

[REDACTED]
Principal Planner

D +44 (0)20 [REDACTED]
M +44 (0) [REDACTED]
avisonyoung.co.uk

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 15 April 2019 13:15
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK)
Subject: RE: Homebase Manor Road 19/0510/FUL
EXTERNAL SENDER

Hi [REDACTED]
I will be presenting the scheme to the Mayor today and the report should be issued to you by COB, failing this then tomorrow morning.
Kind regards

[REDACTED]
From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Sent: 15 April 2019 12:24

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Subject: Homebase Manor Road 19/0510/FUL

Hi [REDACTED]

I just wanted to check that everything is on track for you to be able to send us your Stage 1 report this week?

Kind regards,

[REDACTED]
Principal Planner

[REDACTED]@avisonyoung.com

Avison Young
65 Gresham Street
London, EC2V 7NQ
United Kingdom

D +44 (0)20 [REDACTED]

M +44 [REDACTED]

avisonyoung.co.uk

Energy Memo: Stage I consultation

Homebase
03/04/2019

Case Officer	
Case Number	4795
London Borough	Richmond upon Thames
Application Type (Outline/Hybrid/Detailed)	Detailed
Applicant	Avanton Richmond Development Ltd
Energy Consultant	Hoare Lea
Document Title	Energy Strategy
Document Date	06/02/2019

Proposal

Use	Floorspace/Number of units
Residential	27,680m ² / 385 units
Flexible retail /community / office uses (Classes A1, A2, A3, D2, B1),	480 m ²
	m ²

Overview of proposals

1. The Energy Hierarchy has been followed; the proposed strategy is generally supported; however, the applicant should submit additional information to ensure compliance with the London Plan policies.
2. The applicant has used the GLA's Carbon Emission Reporting spreadsheet, which has been developed to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors. The link to the spreadsheet can be found here: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>. This has been submitted for review, which is welcomed.
3. For the purposes of this assessment, the applicant will be estimating the CO₂ emission performance against London Plan policies using the SAP 10 emissions factors.

BE LEAN

4. A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development.
5. The applicant is encouraged to investigate the potential for improving the thermal bridging default assumptions.

CO₂ and Energy Performance

Domestic

6. The domestic element development is estimated to achieve a reduction of 26 tonnes per annum (7%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. The applicant should note that the new draft London Plan includes a target of a 10% improvement on 2013 Building Regulations from energy efficiency which applicants should be aiming towards. The applicant should therefore model additional energy efficiency measures and commit to higher carbon savings through energy efficiency alone.
7. The applicant has provided a single example of the 'be lean' DER and TER output sheets from the modelling software; they should provide these for all units modelled that contribute to the reported CO₂ emissions.

Non-domestic

8. The non-domestic element of the proposed development is estimated to achieve a reduction of 2 tonnes per annum (20%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.
9. The applicant has provided the 'be lean' BRUKL sheets from the modelling software.
10. Tenant fit-outs will be required to meet the Non-Domestic Building Services Compliance Guide (2013) as a minimum and also meet the minimum energy standard for BREEAM Excellent; this is welcomed.

Energy Demand and Fabric Energy Efficiency

11. The applicant has provided the predicted energy demand for the development, this is welcomed.
12. The applicant has reported the Part L Fabric Energy Efficiency (FEE) performance for the baseline and the 'be lean' scenarios and it is estimated that the development will achieve a reduction of 4% in annual heating and cooling demand.

Cooling and Overheating

13. The demand for cooling and the overheating risk will be minimised through low glazing g-value of 0.4 and external awning above the commercial unit glazing.
14. The applicant is assessing whether to incorporate thermal mass to living room ceilings in the form of phase change plasterboard which, coupled with windows opened at night, will help to reduce high temperatures in the daytime, as the phase change material acts as a 'coolth-sink'. This has been included for in the modelling and is encouraged.

Domestic

15. The applicant has completed the domestic overheating checklist to identify potential site-specific risks which may lead to overheating, this is welcomed.
16. A Dynamic Overheating Analysis has been undertaken to assess the overheating risk within the dwellings using the CIBSE TM59 methodology and the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.
17. The results show that the design proposals are anticipated to meet the CIBSE recommendations for comfort for all units, assuming natural ventilation i.e. occupants can open the windows, blinds, mechanical ventilation and phase change material ceilings. internal blinds and mechanical ventilation, which is not encouraged. Reliance on internal blinds and mechanical ventilation is not encouraged. Therefore:
 - The applicant should consider further passive design measures in line with Policy 5.9, to reduce the reliance on blinds and mechanical ventilation and ensure all units pass the requirements with these features at a minimum.
 - The applicant should confirm that any required blinds will be included in the base build and demonstrate that the blinds do not interfere with the effective opening area of windows.
18. The applicant has also assessed a sample of corridors and has proposed a strategy to ensure the comfort criteria can be met.
19. The applicant proposes to implement cooling to a proportion of apartments, with preference given to those apartments at risk of experiencing excessive noise from external sources. It is not expected that 'active cooling' will be proposed for any residential developments, and on that basis it is not supported.

Non-domestic

20. The area weighted average (MJ/m²) and total (MJ/year) cooling demand for the actual and notional building has been provided and the applicant has demonstrated that the actual building's cooling demand is lower than the notional.

BE CLEAN

District heating

21. The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. They should contact the borough and ask whether they know of any schemes coming through; evidence of this correspondence should be provided.
22. The applicant has provided a commitment to ensure that the development is designed to allow future connection to a district heating network. They suggest that space allowance has been made for heat interface units to the ground floor of each building, and a potential distribution route has been identified, should a district energy system become available in future which the Proposed Development could connect to. Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network have been provided.
23. The applicant is not proposing a site wide heat network and is instead proposing a communal heating system at a building level. The dwellings within each building will connect to the rooftop ASHPs via Heat Interface Units (HIU). Capped-off connections will be provided to the commercial units which will be available to tenants, although the modelling assumes point-of-use water heaters will be provided for their DHW. The applicant argues that the additional distribution losses from a site-wide network will result in a 12% increase in development CO₂ emissions. They also suggest they can't accommodate all external condenser units on the roof of a single block. However, future-proofing for district heating is a strategic policy for reasons and the development is within an area with potential for district heating in future; therefore, the applicant is required to provide a site-wide heat network served by a single energy centre to future proof the development for easy connection to a wider heat network should one become available. Moreover, the applicant should investigate the applicant should investigate how the number of energy centres can be minimised.

BE GREEN

24. The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Photovoltaic (PV) panels and Air Source Heat Pumps.
25. A reduction in regulated CO₂ emissions of 107 tonnes per annum (29%) will be achieved through this third element of the energy hierarchy.

Heat pumps

26. Centralised heat pumps are being proposed in the form of Air Source Heat Pumps (ASHPs) with condensing units on the roof. DHW will be provided by electric immersion top-up.
27. The applicant provides a cost comparison of the operation cost of communal air source heat pumps and gas boilers; with RHI included for the ASHPs are significantly cheaper per kWh of heat, however, without RHI, gas boilers are marginally cheaper.
28. Further information on the heat pumps should be provided including:
 - a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.
 - b. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).
 - c. Manufacturer datasheets showing performance under test conditions for the specific source and sink temperatures of the proposed development and assumptions for hours spent under changing source temperatures. Whether any additional technology is required for hot water top up and how this has been incorporated into the energy modelling assumptions.
 - d. The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently.
 - e. A commitment to monitor the performance of the heat pump system post-construction to ensure it is achieving the expected performance approved during planning. (It is recommended that boroughs condition this).

PVs

29. PV is being proposed equating to circa 120 m² of net PV area; the applicant should confirm the proposed kWp. From the basic roof layout provided, there appears to be additional space for PV. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised and clearly demonstrating any constraints. The applicant is required to maximise the on-site savings from renewable energy technologies, regardless of the London Plan targets having been

met, and therefore the PV proposals should be reviewed. It should also be noted that the PV savings reported of 3.3 tonnes of CO₂ /annum are considered very low.

DOMESTIC CARBON SAVINGS

Based on the energy assessment submitted at stage I, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy for the domestic buildings.

Table: CO₂ emission reductions from application of the energy hierarchy

	Total residual regulated CO₂ emissions	Regulated CO₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	385		
Energy Efficiency	359	26	7%
CHP	359	0	0%
Renewable energy	254	105	27%
Total		131	34%

30. An on-site reduction of 131 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected for the domestic buildings, equivalent to an overall saving of 34%.
31. A minor discrepancy between the value reported in the Energy Statement and that reported in the GLA spreadsheet is noted; the value in the spreadsheet has been assumed to be correct here.
32. The carbon dioxide savings fall short of the on-site target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions.
33. The domestic buildings are required to meet the zero carbon target as the application was received by the Major on or after the 1st October 2016. The applicant should therefore ensure that the remaining regulated CO₂ emissions, equivalent to [X]tonnes of CO₂ per annum, is met through a contribution to the borough's offset fund.
34. The applicant is required to confirm either the amount of funding that will be paid into the borough's carbon offset fund or that an agreement has been reached with the borough that the applicant will undertake a carbon reduction project off-site to meet the shortfall. In both cases evidence of correspondence with the borough confirming the approach should be provided.

NON-DOMESTIC CARBON SAVINGS

Based on the energy assessment submitted at stage I, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy for the non-domestic buildings.

Table: CO₂ emission reductions from application of the energy hierarchy

	Total residual regulated CO₂ emissions	Regulated CO₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	10		
Energy Efficiency	8	2	20%
CHP	8	0	0%
Renewable energy	6	2	20%
Total		4	40%

35. An on-site reduction of 4 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected for the non-domestic buildings, equivalent to an overall saving of 40%.
36. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.
37. All comments above should be addressed before compliance with London Plan energy policy can be verified.

Recommended conditions / section 106 clauses

Optional

Water Memo: Stage I consultation

Homebase
5 April 2019

To / Case officer:	██████████
From:	██████████
Case name:	Homebase
London Borough:	Richmond Upon Thames
Case number:	4795
Outline/Detailed:	Detailed

Applicant:	Avanton
Flood Risk Document:	Flood Risk Assessment & Drainage Strategy / Feb 2019 / Fairhurst
Drainage Document:	Flood Risk Assessment & Drainage Strategy / Feb 2019 / Fairhurst
Sustainability Document:	Sustainability Strategy / Feb 2019 / Hoare Lea

Proposal

Demolition of existing buildings and structures and comprehensive residential-led redevelopment of four buildings of between four and nine storeys to provide 385 residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.

Overview of proposals

The Flood Risk Assessment provided for the proposed development does not comply with London Plan policy 5.12 (and draft New London Plan policy SI.12), as it does not give appropriate regard to residual flood risks from Surface water and groundwater. A full review of flood risk (including residual risks) from all sources of flooding should be provided, and flood resilience and emergency planning measures should be included to manage these risks.

The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 (and draft policy SI.13). Applicant should provide revised additional attenuation storage volume calculations, and exceedance assessment.

The proposed development generally meets the requirements of London Plan policy 5.15 (and draft New London Plan policy SI.5).

Flood Risk Management (London Plan Policy 5.12, draft new London Plan Policy SI.12)

Flood Source	Flood Risk
Rivers and the sea	1
Surface water	High
Reservoir	None
Groundwater	Not Assessed
Sewer	Low
Other	N/A

1. The site is in Flood Zone 1 and greater than 1 hectare in area (1.8ha). A Flood Risk Assessment (FRA) has been submitted as required under the NPPF.
2. The FRA considers the risk of flooding from a range of sources, but does not adequately address the residual risk of flooding due to surface water and groundwater. The FRA should address the high risk of surface flooding present within the site, and evaluate the groundwater flooding risk consulting relevant sources such as the borough SFRA.
3. The FRA provides a Sequential Test and Exception Test for the development, as required by the NPPF. The Sequential Test notes that lower vulnerability uses are proposed on lower floors, with more vulnerable uses on higher floors.
4. The Flood Risk Assessment provided for the proposed development does not comply with London Plan policy 5.12 (and draft New London Plan policy SI.12), as it does not give appropriate regard to residual flood risks from Surface water and groundwater. A full review of flood risk (including residual risks) from all sources of flooding should be provided, and flood resilience and emergency planning measures should be included to manage these risks.

Sustainable Drainage (London Plan Policy 5.13, draft new London Plan Policy SI.13)

5. The surface water drainage strategy provides an assessment of existing runoff rates, greenfield runoff rates, and required attenuation storage for a range of post-development discharge rates. Selected discharge rate is 25.2 l/s (Greenfield for 1 in 100yr + Climate Change).
6. The surface water drainage strategy addresses the Drainage Hierarchy, and notes that rainwater harvesting, blue/green roofs, permeable paving, and underground

storage tanks would be possible options, and that infiltration is feasible. Measures are shown on plans. This approach does satisfy the requirements of London Plan policy 5.13 (and draft London Plan SI.13). The Applicant is also suggesting trees and we recommend that tree pits are considered for these.

7. The attenuation tank volume has been estimated using a simplified method, which gives an estimated attenuation requirement of 715-962m³. The applicant is proposing a volume of 1020m³, with no further explanation. Proposed volume might be enough, but the selected method is not considered sufficiently accurate to ensure that the specified tank volume will allow discharge rates to be restricted to the desired rate. Applicant should ensure proposed volume is adequate by providing evidence of a suitable method of calculation.
8. No assessment of exceedance flow paths has been provided. Additional information should be provided showing that exceedance flow paths through the site are available in the case of attenuation system blockage or an extreme rainfall event.
9. The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 (and draft policy SI.13). Applicant should provide revised additional attenuation storage volume calculations, and exceedance assessment.

Water Efficiency (London Plan Policy 5.15, Draft Policy SI.5)

10. The sustainability statement proposes that the proposed dwellings will have a maximum indoor water consumption of 105 l/person/day, in line with the optional standard in Part G of the Building Regulations, and compliant with policy 5.15 of the London Plan (and draft London Plan policy SI.5).
11. The sustainability statement notes that BREEAM 'Very Good' is targeted for the shell of the non-residential component of the development. Water consumption is noted to be excluded as fitout will be done separately, and the maximum number of other available water credits for the shell is achieved.
12. The proposed development generally meets the requirements of London Plan policy 5.15 (and draft New London Plan policy SI.5).

[REDACTED]

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>
Sent: 27 March 2019 11:45
To: [REDACTED]
Cc: [REDACTED] (Avison Young - UK)
Subject: RE: Homebase Manor Road

Hi [REDACTED]
Apologies for the delay in responding. Further to your pre-application letter (dated 21 January 2019), information regarding your queries are set out below, as well as a summary of design changes to the scheme made in direct response to your comments received:

Paragraphs 20 to 27

Full details of the proposed affordable offer including housing tenure mix, rent levels and income thresholds, exploration of grant funding, and details of affordable products are provided in the Affordable Housing Statement and Financial Viability Assessment submitted as part of the planning application submission. Please note that since our last meeting the affordable housing units on the site have been redistributed throughout the site. Shared Ownership units have been added to Block A so that this block is now a mix of Shared Ownership and Private. Block C remains a mix of Shared Ownership and Affordable but the tenures have been redistributed within the block.

Paragraph 31

Pedestrian and cycle routes to and from the site are clearly defined as part of the public realm strategy (and can be found on pages 111 and 129 of the Design and Access Statement).

Paragraph 34

The single aspect north facing units in Block A have been redesigned and are now dual aspect. Please see submitted plans and the Design and Access Statement for further details.

Paragraph 36

The Daylight and Sunlight Light Within Assessment submitted as part of the planning application has undertaken ADF testing and confirms that 93% of the rooms tested will either meet or exceed the recommended ADF targets. The finished floor levels are shown on the elevations and the Design and Access Statement confirms that the minimum floor to ceiling heights are 2.65m.

Paragraph 37 and 38

The submitted scheme maintains a maximum building height of nine storeys in the centre of the site.

Paragraph 40

The Applicant has taken part in two Design Review Panels. Details of comments received can be found on pages 39 and 46 of the DAS.

Paragraph 41 and 42

Details for M4(2) and M4(3) units can be found on pages 134-142 of the DAS. Details of level access are also identified on page 130 of the DAS.

We trust that the above fully satisfies your pre-application comments, but if you do have any questions please let me know.

Kind regards,

[REDACTED]
Principal Planner

D +44 (0)20 [REDACTED]

M +44 (0) [REDACTED]

[avisonyoung.co.uk](mailto:[REDACTED]@avisonyoung.co.uk)

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 14 March 2019 08:04
To: [REDACTED] (Avison Young - UK)
Cc: [REDACTED] (Avison Young - UK)
Subject: Re: Homebase Manor Road
Thanks [REDACTED] will do

What are the headline changes since the last pre app? This will expedite my assessment.

Thanks

[REDACTED]

Get [Outlook for Android](#)

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Sent: Tuesday, March 12, 2019 2:40:17 PM

To: [REDACTED]

Cc: [REDACTED] (Avison Young - UK)

Subject: RE: Homebase Manor Road

Hi [REDACTED]

Since I sent the new memory stick to you, we noticed a typo on drawing MNR AA ALL ZZ DR A 4000 Elevation AA - Manor Road. The version you have says '3000' instead of '4000' on the title box (although the PDF is correctly labelled as '4000'). I have attached the plan now with the correct title box – could you supersede the previous version you have of this plan for the version attached please.

Also, the Drawing Register has been updated – please see attached for the correct version.

Kind regards,

[REDACTED]

Principal Planner

D +44 (0)20 [REDACTED]

M +44 (0) [REDACTED]

[avisonyoung.co.uk](mailto:[REDACTED]@avisonyoung.co.uk)

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 01 March 2019 17:11

To: [REDACTED] (Avison Young - UK)

Cc: [REDACTED] (Avison Young - UK)

Subject: RE: Homebase Manor Road

Thanks [REDACTED]

I am on leave next week, but my colleagues in the support team will open my post and upload the documents on the memory stick when received, and look out for the referral. We can catch up when I return on 11 March.

Kind regards

[REDACTED]

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Sent: 01 March 2019 17:08

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Subject: RE: Homebase Manor Road

Hi [REDACTED]

The Council has confirmed to us that the application will be validated as of 1st March, but we haven't yet received a formal confirmation letter (and the application still shows as 'not validated' on the Council's website).

Kind regards,

[REDACTED]

Principal Planner

D +44 (0)20 [REDACTED]

M +44 (0) [REDACTED]

[avisonyoung.co.uk](mailto:[REDACTED]@avisonyoung.co.uk)

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 01 March 2019 17:06

To: [REDACTED] (Avison Young - UK)

Cc: [REDACTED] (Avison Young - UK)

Subject: RE: Homebase Manor Road

Thanks [REDACTED] – noted.

I have received and uploaded the documents on the previous memory stick, but please note that we have not yet received referral from the LPA (presumably as it hasn't been validated per your email below).

Kind regards

From: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Sent: 01 March 2019 16:54

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] (Avison Young - UK) <[REDACTED]@avisonyoung.com>

Subject: RE: Homebase Manor Road

Hi [REDACTED]

I hope you received the data stick we sent for the Homebase Manor Road application ok. Since we sent the memory stick, and in order for the application to be validated, we have needed to provide some additional plans and update a few of the documents. To ensure you have a complete application pack, I will send you another data stick on Monday with the full application pack. But for information, the difference between the data sticks will be:

- ☐ Design and Access Statement updated
- ☐ Affordable Housing Statement updated
- ☐ Additional proposed elevations included:
 - o MNR-AA-BLA-ZZ-DR-A-4105-R1
 - o MNR-AA-BLA-ZZ-DR-A-4106-R1
 - o MNR-AA-BLA-ZZ-DR-A-4107-R1
 - o MNR-AA-BLC-ZZ-DR-A-4305-R1
- ☐ Area Schedule updated
- ☐ Drawing Register updated
- ☐ Wind Microclimate Assessment updated
- ☐ Flood Risk Assessment and drainage Strategy (may have been missed off the previous data stick)
- ☐ Lighting Strategy (may have been missed off the previous data stick)
- ☐ Utilities Statement (may have been missed off the previous data stick)

Kind regards,

[REDACTED]
Principal Planner

D +44 (0)20 [REDACTED]

M +44 (0) [REDACTED]

[avisonyoung.co.uk](mailto:[REDACTED]@avisonyoung.co.uk)

From: [REDACTED] (GVA)

Sent: 25 January 2019 13:48

To: [REDACTED]

Subject: RE: Homebase Manor Road

Hi [REDACTED]

No problem, will do.

Kind regards,

[REDACTED]
Principal Planner

GVA

T 020 [REDACTED]

M [REDACTED]

[REDACTED] gva.co.uk | www.gva.co.uk

65 Gresham Street, London EC2V 7NQ

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 25 January 2019 13:29

To: [REDACTED] (GVA)

Subject: Re: Homebase Manor Road

Hi [REDACTED]

No need for hard copies, but if you can send over a full electronic copy directly to me by link or similar that would be helpful.

Thanks

[REDACTED]

From: "[REDACTED] (GVA)" <[REDACTED]@gva.co.uk>

Date: Friday, 25 January 2019 at 10:38

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: Homebase Manor Road

Hi [REDACTED]

Would you like us to send you a hard copy of the application pack once it has been submitted?

Kind regards,

[REDACTED]

Principal Planner

GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED]@gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

Project Details: Manor Road, Richmond		Job No. A3004		Date of issue											
				Day Month Year		16	08	19	19						
						01	02	2	3						
						19	19	19	1						
Dwg No.		Description		Scale		Current revision									
Drawing Number															
SITE PLANS															
MNR AA ALL ZZ DR A 1000	Existing Site Location Plan	1:1250	@A1	R2		R1	R2	R2							
MNR AA ALL ZZ DR A 1100	Existing Site Block Plan	1:500	@A1	R2		R1	R2	R2							
EXISTING DRAWINGS															
MNR AA ALL GF DR A 1200	Existing Ground Floor Plan	1:200	@A1	R2		R1	R2	R2							
MNR AA ALL M1 DR A 1201	Existing Mezzanine Plan	1:200	@A1	R2		R1	R2	R2							
MNR AA ALL ZZ DR A 1300	Existing Sections - Homebase	1:200	@A1	R2		R1	R2	R2							
MNR AA ALL ZZ DR A 1400	Existing Elevations 1 2 3 & 4 - Homebase	1:200	@A1	R2		R1	R2	R2							
DEMOLITION DRAWINGS															
MNR AA ALL ZZ DR A 1500	Site plan - demolition drawing	1:200	@A1	R2		R1	R2	R2							
MNR AA ALL ZZ DR A 1501	Ground floor existing - demoition drawing	1:200	@A1	R2		R1	R2	R2							
MNR AA ALL ZZ DR A 1502	Mezzanine floor existing - demolition drawing	1:200	@A1	R2		R1	R2	R2							
MNR AA ALL ZZ DR A 1503	Sections existing - demolition drawing	1:200	@A1	R2		R1	R2	R2							
MNR AA ALL ZZ DR A 1504	Elevations existing - demolition drawing	1:200	@A1	R2		R1	R2	R2							
GENERAL ARRANGEMENT PLANS															
MNR AA ALL B1 DR A 1999	Basement Plan	1:500	@A1	R2		R1	R2	R2							
MNR AA ALL GF DR A 2000	Ground Floor Plan	1:500	@A1	R3		R1	R2	R3							
MNR AA ALL 01 DR A 2001	First Floor Plan	1:500	@A1	R3		R1	R2	R3							
MNR AA ALL 01 DR A 2002	Second Floor Plan	1:500	@A1	R2		R1	R2	R2							
MNR AA ALL 01 DR A 2003	Third Floor Plan	1:500	@A1	R2		R1	R2	R2							
MNR AA ALL 04 DR A 2004	Fourth Floor Plan	1:500	@A1	R2		R1	R2	R2							
MNR AA ALL 05 DR A 2005	Fifth Floor Plan	1:500	@A1	R2		R1	R2	R2							
MNR AA ALL 06 DR A 2006	Sixth Floor Plan	1:500	@A1	R2		R1	R2	R2							
MNR AA ALL 07 DR A 2007	Seventh Floor Plan	1:500	@A1	R2		R1	R2	R2							
MNR AA ALL 08 DR A 2008	Eighth Floor Plan	1:500	@A1	R2		R1	R2	R2							
MNR AA ALL RF DR A 2009	Roof Plan	1:500	@A1	R2		R1	R2	R2							
P11559 00 001 100	Landscape general arrangement	1:500	@A1	01		00		01							
P11559 00 001 101	Landscape roof plan	1:500	@A1	00			00	00							
BLOCK - FLOOR PLANS															
MNR AA BA1 GF DR A 2100	Block A Core A - Ground Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA1 01 DR A 2101	Block A Core A - First Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA1 02 DR A 2102	Block A Core A - Second Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA1 03 DR A 2103	Block A Core A - Third Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA1 04 DR A 2104	Block A Core A - Fourth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA1 05 DR A 2105	Block A Core A - Fifth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA1 06 DR A 2106	Block A Core A - Sixth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA1 07 DR A 2107	Block A Core A - Roof Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA2 B DR A 2199	Block A Core B,C,D - Basement Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA2 GF DR A 2200	Block A Core B,C,D - Ground Floor Plan	1:100	@A1	R2		R1	R2	R2							
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MNR AA BA2 02 DR A 2202	Block A Core B,C,D - Second Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA2 03 DR A 2203	Block A Core B,C,D - Third Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA2 04 DR A 2204	Block A Core B,C,D - Fourth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA2 05 DR A 2205	Block A Core B,C,D - Fifth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA2 06 DR A 2206	Block A Core B,C,D - Sixth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA2 07 DR A 2207	Block A Core B,C,D - Seventh Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA2 08 DR A 2208	Block A Core B,C,D - Eighth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BA2 RF DR A 2209	Block A Core B,C,D - Roof Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 GF DR A 2300	Block B Core A - Ground Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 01 DR A 2301	Block B Core A - First Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 02 DR A 2302	Block B Core A - Second Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 03 DR A 2303	Block B Core A - Third Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 04 DR A 2304	Block B Core A - Fourth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 05 DR A 2305	Block B Core A - Fifth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 06 DR A 2306	Block B Core A - Sixth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 07 DR A 2307	Block B Core A - Seventh Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 08 DR A 2308	Block B Core A - Eighth Floor Plan	1:100	@A1	R2		R1	R2	R2							
MNR AA BB1 RF DR A 2309	Block B Core A - Roof Plan	1:100	@A1	R2		R1	R2	R2							

MNR AA BC1 B DR A 2399	Block C Cores A&B Plan - Lower Ground Floor Plan	1:100	@A1	R2	R1	R2	R2						
MNR AA BC1 GF DR A 2400	Block C Cores A&B Plan - Ground Floor Plan	1:100	@A1	R2	R1	R2	R2						
MNR AA BC1 01 DR A 2401	Block C Cores A&B Plans - First Floor Plan	1:100	@A1	R2	R1	R2	R2						
MNR AA BC1 02 DR A 2402	Block C Cores A&B Plan - Second Floor Floor Plan	1:100	@A1	R2	R1	R2	R2						
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MNR AA BC1 04 DR A 2404	Block C Cores A&B Plan - Fourth Floor Plan	1:100	@A1	R2	R1	R2	R2						
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MNR AA BC1 RF DR A 2407	Block C Cores A&B Plan - Roof Plan	1:100	@A1	R2	R1	R2	R2						
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MNR AA BD1 04 DR A 2504	Block D Cores A&B Plans - Fourth Floor Plan	1:100	@A1	R2	R1	R2	R2						
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MNR AA BD1 06 DR A 2506	Block D Cores A&B Plans - Sixth Floor Plan	1:100	@A1	R2	R1	R2	R2						
MNR AA BD1 07 DR A 2507	Block D Cores A&B Plans - Seventh Floor Plans	1:100	@A1	R2	R1	R2	R2						
MNR AA BD1 08 DR A 2508	Block D Cores A&B Plans - Eighth Floor Plans	1:100	@A1	R2	R1	R2	R2						
MNR AA BD1 RF DR A 2509	Block D Cores A&B Plans - Roof Plan	1:100	@A1	R2	R1	R2	R2						
PROPOSED SECTIONS													
MNR AA ALL ZZ DR A 3000	Site Sections Proposed	1:100	@A1	R1		R1	R1						
PROPOSED SITE ELEVATIONS													
MNR AA ALL ZZ DR A 4000	Elevation AA - Manor Road	1:500	@A1	R1		R1	R1						
PROPOSED BLOCK ELEVATIONS													
MNR AA BLA ZZ DR A 4100	Block A Elevations	1:100	@A1	R2	R1	R2	R2						
MNR AA BLA ZZ DR A 4101	Block A Elevations	1:100	@A1	R2	R1	R2	R2						
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MNR AA BLB ZZ DR A 4201	Block B Elevations	1:100	@A1	R2	R1	R2	R2						
MNR AA BLC ZZ DR A 4300	Block C Elevations	1:100	@A1	R2	R1	R2	R2						
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MNR AA BLC ZZ DR A 4304	Block C Elevations	1:100	@A1	R1			R1						
MNR AA BLC ZZ DR A 4305	Block C Elevations	1:100	@A1	R1				R1					
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MNR AA BLD ZZ DR A 4405	Block D Elevations	1:100	@A1	R1			R1						
Key: X = Issue sheet only I = Information A = Approval R = Comment PI = Planning C = Construction T = Tender 1 = A3 size print 1* = A1 size print E = Electronic Issue ** = In DWG format		Distribution:			Recipients:								
		██████████ (Avison Young)			E	E	E	E					
		██████████ (Avison Young)			E	E	E	E					
		██████████ (Avanton)			E	E	E	E					
		██████ ██████ (ICG Longbow)			E	E	E	E					
		██████ ██████ (London Borough of Richmond upon Thames)						P	P				
		Purpose of Issue			PI	PI	PI	PI					



1 Manor Road Elevation
Scale: 1:500

General notes

All setting out must be checked on site
All levels must be checked on site and refer to
Ordnance Datum Newlyn unless alternative Datum given
All fixings and weathervings must be checked on site
All dimensions must be checked on site
This drawing must not be scaled
This drawing must be read in conjunction with all other
relevant drawings, specification clauses and current design risk
register.
This drawing must not be used for land transfer purposes
Calculated areas in accordance with Assael Architecture's
Definition of Areas for Schedule of Areas
This drawing must not be used on site unless issued for
construction
Subject to survey, consultation and approval from all statutory
Authorities

Revision Status:
P=Preliminary
C=Contract

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Drawing notes

Electronic file reference

MNR-AA-ALL-ZZ-DR-A-4000

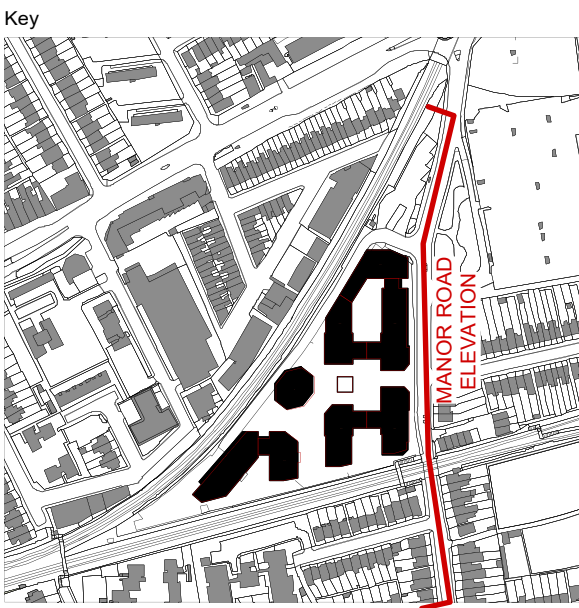
Status R:	Revision	Date	DRN	CHK	CDM
	1	For Planning	06/02/19	RD	HB

Purpose of information

The purpose of the information on this drawing is for:

Planning	<input checked="" type="checkbox"/>
Information	<input type="checkbox"/>
Comment	<input type="checkbox"/>
Client approval	<input type="checkbox"/>
Construction	<input type="checkbox"/>

All information on this drawing is not for construction unless it is marked for construction.



Client

Avanton

Project title

A3004
Manor Road Richmond

Drawing title

Manor Road Elevation

Scale @ A1 size

1:500 Feb '19

Drawing N°

MNR-AA-ALL-ZZ-DR-A-4000

Status & Revision

R1

Assael

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[REDACTED]

From: planningsupport@london.gov.uk
Sent: 05 March 2019 16:13
To: [REDACTED] envprotection@richmond.gov.uk; [REDACTED] avisonyoung.com
Subject: GLA 4795 - Homebase Manor Road

Dear [REDACTED]

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008.

Site name: Homebase Manor Road

Address: 84 Manor Road , North Sheen , TW9 1YB

GLA case number: 4795

Local planning authority reference: 19/0510/FUL

Thank you for consulting the Mayor of London in respect of the above application of potential strategic importance, which your Council validated.

Under Article 4(2) of the above Order the Mayor has six weeks from the date of validation by the GLA to provide a statement setting out whether he considers the application complies with his London Plan and his reasons for taking that view.

I hereby give notice that your letter was received on 04 March 2019 and validated on 05 March 2019 , therefore the six week period will terminate on 15 April 2019.

The application has been allocated to [REDACTED] who can be reached on 020 7084 [REDACTED] or email [REDACTED]@london.gov.uk

Yours sincerely

[REDACTED]
Development Management
Greater London Authority

[REDACTED]

From: planningsupport@london.gov.uk
Sent: 04 March 2019 12:11
To: [REDACTED] [REDACTED]@avisonyoung.com; envprotection@richmond.gov.uk
Subject: GLA 4795 - Homebase Manor Road

Send to borough and copy to agent

Dear [REDACTED] [REDACTED]

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008.

Site name: Homebase Manor Road (Awaiting LPA referral)

Address: Manor Road , North Sheen , TW9 1YB

GLA case number: 4795

Local planning authority reference:

Thank you for consulting the Mayor of London in respect of the above application of potential strategic importance, which your Council validated on .

Under Article 4(2) of the above Order the Mayor has six weeks from the date of validation by the GLA to provide a statement setting out whether he considers the application complies with his London Plan and his reasons for taking that view.

I hereby give notice that your letter was received on 04 March 2019 and validated, therefore the six week period will terminate on 14 April 2019.

The application has been allocated to [REDACTED] who can be reached on 020 7084 [REDACTED] or email [REDACTED]@london.gov.uk

Yours sincerely

[REDACTED]
Development Management
Greater London Authority

[REDACTED]

From: pre-applications@london.gov.uk
Sent: 24 January 2019 16:58
To: [REDACTED] gva.co.uk; spatialplanning@tfl.gov.uk; Lucinda Turner;
[REDACTED]@tfl.gov.uk
Cc: [REDACTED] Planning
Subject: GLA 4795 - Homebase Manor Road
Attachments: 4795 Homebase response letter and report.pdf


Dear all

Please find attached a copy of the Pre-application meeting response letter relating to the above site in the London Borough of Richmond upon Thames.

Regards

[REDACTED]
Planning
[REDACTED]@london.gov.uk
[REDACTED]

GREATER **LONDON** AUTHORITY


GVA
65 Gresham Street
London
EC2V 7NQ

Department: Planning
Your reference:
Our reference: GLA/4795/LB
Date: 21 January 2019

Dear 

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: Homebase, Manor Road
LPA: London Borough of Richmond-upon-Thames
Our reference: GLA/4894

Further to the pre-planning application meeting held on 20 December, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely


John Finlayson
Head of Development Management

cc London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Taylor, TfL

21 January 2019

Homebase Site, Manor Road

In the London Borough of Richmond-upon-Thames

The proposal

Redevelopment of the site to provide a residential led scheme comprising 385 units, commercial floorspace and new public realm.

The applicant

The applicant is **Avanton** and the architect is **Assael**.

Context

1 On 20 December 2018 a pre-planning application meeting to discuss the above proposal for the above site was held at City Hall, with the following attendees:

GLA Group



Senior Strategic Planner - Case Officer
Principal Strategic Planner - Urban Design

Applicant



ICG Longbow
Avanton
Avanton
Assael Architects
Assael Architects
GVA Planning
GVA Planning

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3 The site is located in North Sheen on Manor Road in the London Borough of Richmond on Thames. The site is 1.5 hectares in size and bounded by railway lines to the north and south. The east of the site is bounded by Manor Road. North Sheen Bus Terminus is located to the north.

4 Currently the site comprises of a large, low density retail unit with a large amount of surface level car parking. To the east of the site is an additional low density retail unit which is currently occupied by a Sainsbury's store.

5 The are no listed buildings within the vicinity of the site. The Sheendale Road Conservation Area and Sheen Road Richmond Conservation Area are to the west and south west respectively.

6 The site sits within Richmond's character area 6 'Old Gas Works', as defined in the Richmond and Richmond Hill Village Planning Guidance SPD (June 2016).

7 The site is located immediately south of the A316 Manor Circus which forms part of the Transport for London Road Network (TLRN). A level crossing is located on Manor Road immediately south of the site boundary.

8 The entrance to North Sheen rail station is located on the opposite side of Manor Road near the site's southern boundary, there are also 10 bus routes within an acceptable walk distance with stops on Manor Road and Lower Mortlake Road. Based on TfL's Webcat toolkit the application site has a public transport accessibility level (PTAL) of 5, on a scale of 1 to 6b where 6b is the most accessible.

Details of the proposal

9 The scheme proposes redevelopment of the site to provide a residential led scheme of 385 residential units including 35% affordable housing and 480 sq.m. (GIA) of flexible commercial floorspace at ground floor facing a new public square with a retail kiosk. The proposed buildings range from ground plus one to ground plus eight storeys in height and include associated cycle parking, car parking, playspace, landscaping and public realm improvements.

10 The applicant also has an interest in land directly to the north of the application site, the North Sheen bus depot, which does not form part of the scheme proposals at this time.

11 The proposal would be referable to the Mayor under Categories 1A and 1B of the Schedule of the 2008 Order:

- 1A '*Development which comprises or includes the provision of more than 150 houses, flats or houses and flats*';
- 1B (c) '*Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres*'

Strategic planning issues and relevant policies and guidance

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Richmond Local Plan 2018; and, the London Plan 2016 (Consolidated with Alterations since 2011).

13 The following are relevant material considerations:

- Revised National Planning Policy Framework (July 2018);
- National Planning Policy Guidance;
- Draft London Plan (consultation draft December 2017, incorporating early suggested changes published August 2018) which should be taken into account as explained in the NPPF; and
- Richmond and Richmond Hill Village Planning Guidance (June 2016).

14 The relevant strategic issues and corresponding policies are as follows:

- Housing *London Plan; Affordable Housing and Viability SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG.*
- Retail *London Plan.*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG.*
- Climate change *London Plan; Sustainable Design and Construction SPG; London Environment Strategy.*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*
- Water *London Plan; London Environment Strategy.*

Case history

15 A pre-application meeting was held on 10 October 2018 to discuss a proposal for the redevelopment of this site and a written pre-application note was issued on 8 November 2018. GLA officers supported the redevelopment of the site to provide 381 residential units across two buildings, including 522 sq. m. of commercial space. The GLA highlighted that there was scope for additional height in the centre of the site. Some matters relating to affordable housing; urban design; inclusive access; climate change; flood risk, drainage and water; and transport required resolution in order to make the proposals compliant with the London Plan and draft London Plan.

Summary of meeting discussion

16 Following a presentation of the proposed scheme from the applicant team, the meeting discussions covered strategic issues with respect of affordable housing and urban design. GLA officer advice in respect of these issues is set out within the sections that follow. This note should be read in conjunction with the previous pre-application advice issued 8 November 2018.

Principle of development

17 The principle of development has previously been agreed, and the redevelopment of the low-density retail unit and associated surface level car parking for a residential led scheme was supported.

18 There was no objection to the loss of the retail use, which is not located in a designated town centre.

19 The proposals include 480 sq.m. of commercial floorspace. Given the existing context, the provision of small-scale supporting commercial uses to contribute to a sense of place is supported.

Affordable housing

20 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. and Policy H7 provides a flexibly prescribed tenure mix of: 30% social rent / London Affordable Rent; 30% intermediate products; and, 40% to be determined by the relevant local authority based on identified need and consistency with the definition of affordable housing.

21 The draft London Plan and the Mayor's Affordable Housing and Viability Supplementary Planning Guidance seek to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6; schemes that provide 35% affordable housing by habitable room without public subsidy and that meet other criteria, including tenure, are not required to submit viability information to the GLA. Such applications are also exempted from a late stage review mechanism; this is known as the Fast Track route.

22 The applicant confirmed at the meeting the intended affordable housing offer is 35% by habitable room, comprising 132 of the 385 units. The tenure split proposed is 50% affordable rent and 50% shared ownership by habitable room, comprising 53 affordable rent units and 79 shared ownership units. The applicant must provide full details of the tenure mix, details of any rent levels and any income thresholds.

23 If a 35% affordable housing by habitable room offering is made at application stage in accordance with the Mayor's Affordable Housing and Viability SPG and the draft London Plan the scheme would qualify for the Fast Track Route.

24 The applicant is reminded that they should investigate Mayoral grant funding opportunities as part of this process in order to qualify for fast track, so that the affordable housing provision is maximised. If the application cannot be assessed under the Fast Track route, a financial viability assessment will be required.

25 In addition, the affordability of the units must accord with the requirements of Policy H7 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG and the London Plan Annual Monitoring Report 14 for 2017/18. Details of the proposed products must therefore be submitted, and the applicant should note that London Affordable Rent, London Living Rent and London Shared Ownership are the Mayor's preferred affordable housing tenures.

26 In accordance with Policy H6 of the draft London Plan and the Mayor's SPG, the S106 agreement must include an early stage viability review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission. Moreover, if the proposals cannot be assessed under the Fast Track Route, a late stage review will also be required and secured within the S106. A draft of the S106 agreement must be agreed with GLA officers during the course of the application; example clauses are provided within the SPG.

27 Richmond Council will be expected to publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information.

Housing mix

28 London Plan Policy 3.8 and draft London Plan Policy H12 encourage a full range of housing choice. Draft London Plan Policy H12 recognises that central or urban sites may be most appropriate for schemes with a significant number of one and two beds. Owing to the accessible location, the proposed housing mix, shown in table one below, does not raise any strategic planning concerns.

Table one: proposed unit mix

No. bedrooms	Units	% of total
1 bed	152	40%
2 bed	178	46%
3 bed	55	14%
Total	385	

Residential quality

29 London Plan Policy 3.5 and Policy D4 of the draft London Plan promote quality in new housing provision, with further guidance provided in the Housing SPG. The scheme meets the minimum residential space standards and should continue to do so as it progresses to a full application.

Children's play space

30 Policy 3.6 of the London Plan and Policy S4 of the draft London Plan, seeks to ensure that development proposals include suitable provision for play and recreation. The applicant has demonstrated compliance on site, which is welcomed.

Urban design

31 The broad layout principles are supported. The pedestrian and cycle routes to and from the site should be clearly defined as part of the public realm strategy.

32 The applicant has demonstrated the uses that flank the proposed public square are appropriate when considered alongside the arrangement of the blocks. Further work has improved the openings to courtyard spaces to reduce any detracting from the distinction between public and private realm. The treatment of the green spaces between the two southern blocks and railway has been reconsidered and represents an improved response to avoid any 'left over' spaces or poorly overlooked areas that could encourage anti-social behaviour.

33 The inclusion of ground floor duplexes is welcomed and will help to activate the main street frontage. The applicant has located additional duplex units along the railway edge of the south eastern block to create a 'mews' type environment. This will encourage passive surveillance along this edge and reduces the number of single aspect units facing onto the railway. This is welcomed.

34 The north facing, single aspect units at the far north of the site, facing the bus depot, must be reconsidered. The residential quality, particularly in terms of outlook on the lower floors, is a concern.

35 At the upper levels, residential layouts are efficient with a good distribution of cores creating good core to unit ratios.

36 Internal layouts should be provided to ensure that all units will provide liveable environments with good access to natural daylight. ADF testing should be undertaken to ensure lower level inward facing units in particular receive adequate daylight penetration to living spaces. All units should also achieve 2.5 metre minimum floor to ceiling heights.

37 The heights and massing strategy responds positively to the existing low-rise context, with the scale dropping down to respect neighbouring properties along the south and eastern edges. The scope for additional height was identified in the previous pre-application advice and the applicant has now incorporated this in the design, with the tallest building being 9 storeys at the centre of the site. Given the accessibility of the site, the applicant should explore further height. In particular, there is strong potential to increase the height of the 'jewel' building. Options should be tested in local townscape views in tandem with daylight/sunlight analysis.

38 A taller building would be beneficial in terms of landmarking the proposed public square.

39 The simple and refined approach to the architecture is welcomed and the intention to explore the use of varying tones of brickwork to create character areas across the site remains supported

40 The applicant is encouraged to take the scheme to the Design Review Panel at the earliest opportunity.

Inclusive access

41 London Plan Policy 3.8 and Policy D5 of the draft London Plan require that ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The location of wheelchair units should be indicated on the plans and provided across tenures and unit sizes.

42 Any application must provide full details of the accessibility and how any level changes are managed for both residential and retail accommodation.

Conclusion

43 The proposed redevelopment of the site to provide a residential-led scheme comprising 381 units and 480 sq.m. commercial floorspace is supported in principle and the scale and massing is appropriate, with scope for additional height in the central areas of the site to create a landmark building.

44 In addition to the issues identified in this report, issues relating to climate change; flood risk, drainage and water; and transport detailed in the pre-application report issued on 8 November 2018 must also be addressed in order to make the proposals compliant with the London Plan and draft London Plan.

for further information contact GLA Planning Unit:

Team Leader

020 7983 [redacted] email [redacted]@london.gov.uk

Senior Strategic Planner (case officer)

020 7084 [redacted] email [redacted]@london.gov.uk

[REDACTED]

From: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 10 January 2019 18:19
To: [REDACTED]
Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]
I've been having a few issues with my emails, so I'm not sure if you received my response to your email below.
Just to confirm, that [REDACTED] will be available at 10am tomorrow.
Thank you,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED]@gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 10 January 2019 16:50
To: [REDACTED] (GVA)
Subject: RE: GLA 4795 - Homebase Manor Road

Afternoon [REDACTED]
Our energy team have tried to contact [REDACTED] twice this week as requested.
Can I suggest tomorrow at 10am for [REDACTED] to expect a call. Let me know if this is too short notice and suggest a time to agree for one of our team to call him.
Many thanks
[REDACTED]

From: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 19 December 2018 14:22
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]
We haven't invited anyone from Richmond.
That would be helpful if you could put our energy consultants in touch with your energy team. Our energy consultant won't attend tomorrow now but would like to take the opportunity to discuss directly with your team, as you suggest.
Contact details for [REDACTED] our energy consultant:

[REDACTED]
Senior Associate

[REDACTED]
Email [REDACTED]@hoarelea.com
Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 19 December 2018 13:42

To: [REDACTED] (GVA)

Subject: RE: GLA 4795 - Homebase Manor Road

Thanks [REDACTED]

Is anyone attending from Richmond?

I'm afraid there is no one from energy available to attend the meeting tomorrow, but I can arrange to put them in touch with your energy consultants for a phone discussion if that would be useful?

Kind regards

From: [REDACTED] (GVA) <[\[REDACTED\]@gva.co.uk](mailto:[REDACTED]@gva.co.uk)>

Sent: 19 December 2018 13:06

To: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Subject: FW: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

Just to let you know that I will be attending tomorrow's meeting in place of [REDACTED]

Kind regards,

[REDACTED]
Principal Planner

GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)

Sent: 14 December 2018 11:20

To: [REDACTED]

Subject: RE: GLA 4795 - Homebase Manor Road

Thanks [REDACTED]

Kind regards,

[REDACTED]
Principal Planner

GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 14 December 2018 11:15

To: [REDACTED] (GVA)

Subject: Re: GLA 4795 - Homebase Manor Road

Thanks [REDACTED] All received. I'll issue an agenda to you early next week.

Kind regards

From: "[REDACTED] (GVA)" <[REDACTED]@gva.co.uk>

Date: Friday, 14 December 2018 at 11:12

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

I've just sent you a WeTransfer with the Design Document. Hope you receive it ok.

Kind regards,

[REDACTED]

Principal Planner

GVA

T 020 [REDACTED] M [REDACTED]

[REDACTED] [gva.co.uk](mailto:[REDACTED]@gva.co.uk) | www.gva.co.uk

65 Gresham Street, London EC2V 7NQ

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 14 December 2018 11:04

To: [REDACTED] (GVA)

Subject: Re: GLA 4795 - Homebase Manor Road

Thanks [REDACTED] – I didn't receive the Design Doc email

Perhaps you could file transfer it for me?

Thanks

[REDACTED]

From: "[REDACTED] (GVA)" <[REDACTED]@gva.co.uk>

Date: Friday, 14 December 2018 at 10:58

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: FW: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

I just wanted to check you received both the emails below – I'm conscious they are quite large attachments.

Kind regards,

[REDACTED]

Principal Planner

GVA

T 020 [REDACTED] M [REDACTED]

[REDACTED] [gva.co.uk](mailto:[REDACTED]@gva.co.uk) | www.gva.co.uk

65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 14 December 2018 08:48
To: [REDACTED]
Cc: [REDACTED] (GVA); [REDACTED] (GVA)
Subject: FW: GLA 4795 - Homebase Manor Road

Hi [REDACTED]
Further to my email below, please find attached the Design Document prepared by Assael. I would be grateful if you could confirm receipt of these two emails (due to size).
Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 14 December 2018 08:46
To: [REDACTED]
Cc: [REDACTED] (GVA); [REDACTED] (GVA)
Subject: FW: GLA 4795 - Homebase Manor Road

Hi [REDACTED]
In advance of our meeting on 20th December, please find attached the following documents:

- ☐ Design Document prepared by Assael (to follow in a separate email due to size).
- ☐ Planning Obligations note.
- ☐ Energy Strategy note.
- ☐ Note of TfL meeting.
- ☐ Letter from TfL.

Could I also add [REDACTED] (another representative for LCG Longbow) to our attendee list please?
Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 12 December 2018 12:09
To: [REDACTED]
Subject: FW: GLA 4795 - Homebase Manor Road

Hi [REDACTED]
Further to my email below, the attendees from Avanton will be [REDACTED] and [REDACTED]
Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 12 December 2018 11:17
To: [REDACTED]
Cc: [REDACTED] (GVA)
Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

We will send you the documents tomorrow.

The attendees are:

- . Avantan (I will confirm shortly)
- . ICG Longbow ([REDACTED])
- . Assael ([REDACTED])
- . GVA ([REDACTED])
- . Hoare Lea ([REDACTED])

We will include a note on energy in our pre-app pack (responding to the comments previously raised – concerning the Air Source Heat Pumps), but we would be grateful if a representative from your energy team could also attend.

Kind regards,

[REDACTED]
[REDACTED]

Principal Planner

GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 12 December 2018 09:52

To: [REDACTED] (GVA)

Cc: [REDACTED] (GVA)

Subject: RE: GLA 4795 - Homebase Manor Road

Morning [REDACTED]

Can you let me know when I can expect to receive the revised proposals and documents that you wish to discuss at next week's follow up?

If you could also confirm the attendees at some point. You have mentioned your energy consultant attending – I have previously sent over to you our energy team's initial comments – if there is a significant issue on energy and you anticipate needing a representative of our energy team to attend please can you advise with your position.

Many thanks

[REDACTED]

From: [REDACTED] (GVA) <[\[REDACTED\]@gva.co.uk](mailto:[REDACTED]@gva.co.uk)>

Sent: 22 November 2018 15:48

To: Pre-applications <Pre-applications@london.gov.uk>; [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Cc: [REDACTED] (GVA) <[\[REDACTED\]@gva.co.uk](mailto:[REDACTED]@gva.co.uk)>

Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

Thank you for your email below. We would like confirm our attendance at the meeting on 20th December. We anticipate there being a representative from Avantan and ICG Longbow (the applicant), GVA (Planning), Assael (Architects), Sanderson (transport) and Hoare Lea (Energy) but we will confirm this nearer the time.

To confirm, the applicant does not operate a purchase order system. For the previous meeting on Homebase Manor Road, I understand that the GLA raised an invoice and the applicant paid by bank transfer. Could you we follow the same invoicing procedure please?

Kind regards,

[REDACTED]
[REDACTED]

Principal Planner

GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: pre-applications@london.gov.uk [<mailto:pre-applications@london.gov.uk>]

Sent: 22 November 2018 14:06

To: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk); [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk); [REDACTED] [REDACTED] (GVA); [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)
Subject: GLA 4795 - Homebase Manor Road

Dear [REDACTED] [REDACTED]

GLA reference number: 4795

Site Name: Homebase Manor Road

Site Address: 84 Manor Road, North Sheen, TW9 1YB

LB: Richmond upon Thames

Proposal Description: Redevelopment of the site to provide a residential led scheme comprising 381 units, commercial floor space and new public realm.

On 15 November 2018 the Development Management Unit received your request for a follow-up meeting for the above pre-planning application proposal. The case officer assigned to this case is [REDACTED]

We can only comment on information provided in advance of the meeting. Where we have no or limited information we will not be able to provide a comprehensive assessment. The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

The advice letter will only address issues that you have sent documentation on. The case officer will carry out a site visit and assess the documentation prior to the meeting. A meeting note will be sent to you two working days prior to the meeting which will outline the issues that will be discussed.

Finance

As per GLA Financial Regulations we can only confirm the meeting date upon receiving a correct application form.

The form you have sent to us is correct and we can confirm the meeting date upon your acceptance of the proposed meeting date and time at the bottom of this email.

In order to invoice the company paying for the meeting, we need to confirm whether they use a purchase order system. **Please could you confirm this?**

If they do use a purchase order system, then a PO will need to be raised by them and sent to accountspayable@tfl.gov.uk before the meeting.

Cancellation

If, due to circumstances out of our control, we cancel the meeting we will reschedule for another time as soon as practical. Meetings can be rescheduled at your request up to 48 hours prior. The fee is non-refundable on cancellation.

I can offer a tentative date and time of **Thursday 20 December @ 10:00**. Please let me know if this is acceptable and who will be attending.

Regards



Planning Support
Greater London Authority

#LondonIsOpen

NOTES OF MEETING

**Manor Road, Richmond
(SA ref: 10596)**

10:00 7 November 2018

Transport for London, Broadway, London

Present:	██████████ (████)	Sanderson Associates
	██████████ (████)	Avanton
	██████████ (████)	Avanton
	██████████ (████)	ICG Longbow
	██████████ (████)	TfL Spatial Planning
	██████████ (████)	TfL Network Sponsorship
	██████████ (████)	TfL Bus Operations
	██████████ (████)	TfL Bus Network Development

Title

ACTION

- Guidance was provided by █████ on the parameters for the Transport Assessment which will support the planning application. █████ advised that the majority of these are in place and others programmed.
- █████ advised that she wished to see census data used to predict mode share rather than the TRICS database.
- Journey to Work assessment required to identify potential impact on bus patronage. This will be key in terms of buses towards Hammersmith.
- A bus stop audit will be required and should focus of the two nearest stops to the site. Having reviewed the nearest stops it has been decided to assess the stop on Manor Road and the stops to either the side of Manor Circus which pick up other services.
- Building over the bus terminus was discussed and in principle no major objections were raised by TfL officers. If proposals for the bus terminus were to be explored further, an indicative site layout will be required for review. Driver facilities will be required as the existing terminus is used as a layover not a passenger facility. Clearance of 6.5m advised. TfL to confirm number of spaces required. Design Guide to be provided.
- Manor Circus improvement scheme discussed and we will need to identify the level if impact (increased use) the development is likely to generate.
- Travel Plan required which is already well advanced.
- Servicing and Delivery Management Plan required – █████ in discussions with Asseal and Gillespies to rationalise external areas. 3% disabled parking provision required (12 spaces) but the layout needs to be able to accommodate the full 10% provision if demand is established in future.
- EV charging facilities should also be provided 20% active the remainder passive to be activated if demand established.
-

- Construction Management Plan required – this will need to factor in the Manor Circus improvement scheme which is due to commence 2020.
- Car Club spaces – Avanton in discussion with CBRE.



Our ref: 18/3586

██████████
Sanderson Associates (Consulting Engineers) Ltd
Sanderson House
Jubilee Way
Grange Moor
Wakefield
WF4 4TD

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

21st November 2018

Dear ██████████

Manor Road Homebase, LB Richmond – TfL's pre-application advice

Thank you for participating in Transport for London's (TfL) pre-planning application process, the aim of which is to ensure that development is successful in transport terms and in accordance with relevant London Plan policies. This letter concerns the recent meeting regarding the proposed redevelopment of the Homebase site on Manor Road in the London Borough of Richmond upon Thames (LBRuT).

The following comments are made by Transport for London officers on a 'without prejudice' basis only and are intended to ensure that this development is successful in transport terms and in line with relevant London Plan policies. You should not interpret them as indicating any subsequent Mayoral decision on any planning application based on the proposed scheme. Furthermore, these comments also do not necessarily represent the views of the Greater London Authority.

Based on the information provided in the Transport Scoping Study (TSS) and meeting, it is understood that the proposal consists of:

- 414 residential units; and
- Two commercial units (482sqm floorspace).

A pre-planning application meeting was held with TfL on the 7th November 2018 regarding the development proposals. The meeting was attended by the following:

██████████
██████████████████

Sanderson Associates
Avanton

[REDACTED]
[REDACTED]

Avanton
ICG Longbow

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

TfL Spatial Planning
TfL Network Sponsorship
TfL Bus Operations
TfL Bus Network Development

This pre-application response is based on the information provided to date including the TSS and summarises the key points discussed at our meeting.

Site context

The site is bound by railway lines to the south and west, Manor Road to the east and the North Sheen Bus Terminus is located to the north. The site is located immediately south of the A316 Manor Circus which forms part of the Transport for London Road Network (TLRN). A level crossing is located on Manor Road immediately south of the site's southern boundary.

The entrance to North Sheen rail station is located on the opposite side of Manor Road near the sites southern boundary; there are also 10 bus routes within an acceptable walk distance. Based on TfL's Webcat toolkit the application site has a public transport accessibility level (PTAL) of 5, on a scale of 1 to 6b where 6b is the most accessible.

Transport Assessment

TfL are due to release new Transport Assessment Guidance at the beginning of December. The Transport Assessment (TA) should be undertaken in accordance with this new guidance which should be available from: <https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants>, further details on the specific requirements are set out below.

The draft London Plan was published on 29 November 2017 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. We will be expecting all new planning applications to give material consideration to the policies set out within this document, noting that the decision-maker is to determine the balance of weight to be given to adopted and draft policies.

Trip generation and mode split

Surveys of the existing uses on site have been undertaken and will be used to establish the existing vehicle trip generation for the site.

The TRICS database will be used to determine total person trips for the proposed uses. TfL would recommend that only TRICS surveys from the Greater London area are used in this assessment. Census data should be

used to establish mode share, and adjusted to account for the car-free nature of the development.

Trip generation figures should be presented in the TA by mode, time, and directional flow, with the peak hour number of trips indicated separately.

Site access

There will be no direct vehicular access to the site from the TLRN.

It is proposed to maintain the existing site vehicular access which is shared with the bus terminus. The TA will need to demonstrate that the proposed development will not impact on the operation of the existing bus terminus.

Car parking

The development will be car free with the exception of 12 spaces reserved for disabled users, which accords with the draft London Plan and is welcomed by TfL.

A Parking Design and Management Plan should be submitted alongside the application which indicates how the car parking will be designed and managed, with reference to Transport for London guidance on car parking management and car park design. It will also need to demonstrate where the additional 7% of disabled car parking spaces will be provided on site should demand arise. Furthermore, parking spaces should be leased rather than sold to ensure the land they take up is used as efficiently as possible over the life of the development.

Electric Vehicle Charging Points (EVCP) including passive provision should also be provided in accordance with London Plan standards.

The applicant has indicated that they are currently discussing the viability of providing a car club space on site. TfL would recommend that three years free car club membership is secured for all new residents without a car parking space.

Highway impact

The extent of the highway modelling proposed is acceptable, assuming a net reduction in peak hour vehicle trips.

The models should be validated against on street data i.e. queue length surveys.

Buses

As stated above, there are currently 10 bus routes (65, 371, 493, 190, 419, H37, R68, R70, 391 and H22) within an acceptable walking distance of the site with stops on Manor Road and Lower Mortlake Road. As stated previously, the

TA will need to provide bus trip generation figures by time and by direction, with the peak hour indicated separately. The trip generation figures by direction should consider the existing bus network. TfL will use this information to assess the impact of development, considering the cumulative impact of the development and will be able to confirm if any bus capacity enhancements are required.

A bus stop assessment should be undertaken for the closest two stops to the application site. Should the assessment identify any necessary improvements, these will need to be funded by the applicant.

TfL are currently consulting on changes to bus services within the Richmond area. This would result in a slight reduction in the frequency of services between Manor Circus and Richmond.

North Sheen Bus Terminus

The feasibility of building over the existing North Sheen Bus Terminus was discussed. Any over station development would need to be designed in accordance with TfL guidance, which will be provided separately to this letter. The layout would also need to maintain standing for up to 5 buses including a bus driver facility. TfL suggest that the applicant produces a feasibility design for an over station development which could be used to inform more detailed discussions.

North Sheen Rail Station

North Sheen Station and the trains which serve it are operated by South Western Railway. TfL has no involvement with the operation of this station or the level crossing. TfL would suggest contacting South Western Railway directly to gain information on the capacity of the trains and the existing loads at North Sheen station, and Network Rail concerning the level crossing.

Cycle Parking

760 cycle parking spaces proposed within a secure cycle store with two tier racks located in the basement, which would be in accordance with both the London Plan and draft London Plan.

Cycle stores should be broken up into smaller areas for added security. Short-stay cycle parking should be located in close proximity to building entrances of all buildings to provide convenience and choice for all users. Cycle Parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. The TA should also take into consideration how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

TfL would also advise that shower and locker facilities are provided for members of staff of the commercial units wishing to cycle to work. All cycle

parking spaces should also be easily accessible from cycle routes and appropriate signage, should be provided.

Pedestrian and Cycle Access

The redevelopment will see an increase in pedestrian and cycle trips to / from the site and the local area, and it is noted that additional pedestrian and cycle access points are proposed along Manor Road. The applicant should ensure that the Healthy Streets approach is considered both throughout the site and within the local area, including routes to all transport nodes. In terms of Healthy Streets the development proposals should:

- Demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance <http://content.tfl.gov.uk/healthy-streets-for-london.pdf>
- Reduce the dominance of vehicles on London's streets whether stationary or moving.
- Be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

Any necessary improvements identified by this assessment will need to be funded by the applicant.

It is noted that the Quietway previously proposed along the A316 is no longer being progressed.

Manor Circus

TfL have a highway improvement scheme at Manor Circus which aims to improve pedestrian road safety and to improve the cycling and pedestrian environment. Given that the proposed development will increase pedestrian and cycle movements at Manor Circus TfL will request a contribution towards this scheme.

Travel planning

A residential travel plan will be submitted as part of the planning application. When preparing travel plans, reference should be made to TfL's travel plan guidance.

The Travel Plan should then be secured, delivered, monitored and funded through the Section 106 agreement.

Delivery and construction

In order to minimise the impacts of construction and delivery vehicles, a Construction Logistics Plan (CLP) and Delivery and Servicing Plan (DSP) should be delivered in line with TfL's guidance. An indicative programme of construction should be included in the CLP.

Community Infrastructure Levy

In accordance with London Plan policy 8.3, Community Infrastructure Levy, the Mayor commenced CIL charging for developments on 1st April 2012. It is noted that the proposed development is within the London Borough of Richmond upon Thames, where the Mayoral charge is £50 per square metre Gross Internal Area (GIA). Further details can be found at:
<http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.

Summary

As discussed at our meeting and recorded herein there are a number of issues which require further discussions and action. TfL will welcome further involvement and discussion with the applicant and Richmond Council in order to ensure agreement on as many issues as possible prior to the planning application being submitted.

I hope this provides a useful basis upon which to progress the preparation of the planning application and supporting TA and look forward to hearing from you shortly.

Should you wish to discuss any part of this letter, please contact myself or [REDACTED]
[REDACTED] ([\[REDACTED\]@tfl.gov.uk](mailto:[REDACTED]@tfl.gov.uk) - 020 3054 [REDACTED])

Yours sincerely

[REDACTED]

Lucinda Turner

Director of spatial Planning

Email: [\[REDACTED\]@tfl.gov.uk](mailto:[REDACTED]@tfl.gov.uk)

Direct line: 020 3054 [REDACTED]

Homebase, Manor Road

CIL/S106 obligations – Briefing Note (Initial Heads)

1. Introduction

- 1.1 This note has been prepared by GVA to inform initial discussions with RBRuT regarding s.106 matters associated with the planning application being prepared for the above site.
- 1.2 It is informed by the Planning Obligations Supplementary Planning Document (2014).

2. CIL

- 2.1 The introduction of CIL raises a second funding stream for local planning authorities from development. CIL funds contribute towards strategic infrastructure requirements in the local authority area, whilst S106 contributions are now limited to focus on specific infrastructure requirements deemed to be necessary, acceptable and related to the proposed development.
- 2.2 The applicable CIL rates are as follows:
- Richmond-upon-Thames: The site is located within the 'higher' charging zone where the following rates apply: £250/sqm (residential), £150/sqm (convenience retail), £0/sqm (other); and
 - Mayoral: MCIL2 will apply. RBRuT is a Band 1 borough where a rate of £80/sqm applies.
- 2.3 Our initial calculations indicate a CIL contribution of in the region of £8m (net of SHR and indexing assumptions).

CIL Infrastructure Funding List

- 2.4 To ensure there is no overlap between CIL payment funding and S106 contributions, the Council have published an Infrastructure List (Regulation 123 List) to support their CIL schedule. The following items of relevance to the site are included on the list:
- **Strategic Transport:**
 - o New rail transport signalling scheme to reduce level crossing down time
 - o Improvements, upgrades and refurbishments of North Sheen rail station
 - o Bridge or subway tunnel under A316
 - o Complete London and Borough Cycle Network with associated infrastructure / signage
 - **Educational Facilities:**
 - o Provision of additional primary school capacity

- o Provision of additional secondary school capacity within the borough
- o Provision of additional capacity in new units or by conversion of private, voluntary and independent nurseries into community nurseries
- **Other**
 - o Community Facilities (no local facilities specifically identified)
 - o Strategic Parks and Open Spaces Projects (new provision of play and adventure facilities within existing parks – no specifics)
 - o Waste Facilities (no local proposals identified)
 - o Sports and Leisure Provision (extension of fitness suites and upgrading of artificial turf pitches at Shene Sport and Fitness Centre).

3. Potential Planning Obligations

3.1 The following table explores a ‘long list’ of potential matters that could be controlled under the consent either by s.106 obligation or condition. This is intended to act as a starting point for discussions between the applicant and RBRuT Officers.

Potential Obligation	Comment
Affordable Housing	<ul style="list-style-type: none"> - Amount: 35% (calculated on the basis of habitable rooms), subject to no review mechanism (will be justified with viability evidence) - Affordable tenure split: 50:50 London Affordable Rent: London Shared Ownership - Nomination rights: RBRuT (affordable rent units only) - Registered Provider selection: approach to be discussed/agreed - Phasing: Provided in tranches in line with the delivery of private units (details to be discussed/agreed) - Affordable Housing Scheme secured by condition (indicative unit-by-unit tenure details to be provided in application) <p>[Refer to separate affordable housing note]</p>
Highways	<ul style="list-style-type: none"> - Off-site highway works not required (TA will confirm this) - Upgrades to public transport (nothing substantive anticipated – subject to conclusions of TA) - Upgrade works to North Sheen Train Station (no obligation as dealt with through CIL) - Pedestrian/cycle infrastructure (no works required – existing TfL scheme is already funded) - Controlled Parking Zone (extension) – details to be discussed/agreed. - Parking controls for blue badge spaces (amount, restrictions on use) (more appropriately controlled by condition) - Car club bays (amount, specification, restrictions on use (more appropriately controlled by condition) - Cycle parking spaces (amount, specification (more appropriately controlled by condition) - EV charging points (more appropriately controlled by condition) - Servicing strategy (more appropriately controlled by condition) - Travel Plan (both residential and non-residential) (condition or s.106)
Amenity	<ul style="list-style-type: none"> - On site play space (more appropriately controlled by condition) - Off-site play space (dealt with through CIL) - Off-site parks/open space (dealt with through CIL)

Environmental/ technical	Team to advise what mitigation measures may be required as part of assessments/reports. Subject to the conclusion of the Air Quality, Noise, Contamination, Townscape, Heritage, Townscape, Health, Tree, Biodiversity, Flooding, Archaeology reports. Detail of any mitigation and the best means of securing that (condition or s.106) to be discussed and agreed with LPA in due course).
Other	<ul style="list-style-type: none"> - Employment and skills (terms to be discussed with LPA) - Sustainable design and construction (energy strategy should be secured by condition) - Community safety (Secure by Design) (more appropriately controlled by condition) - Monitoring (s.106 – terms to be discussed with LPA)

GVA

7th December 2018

Manor Road, Richmond. Energy Strategy and Distribution Considerations.

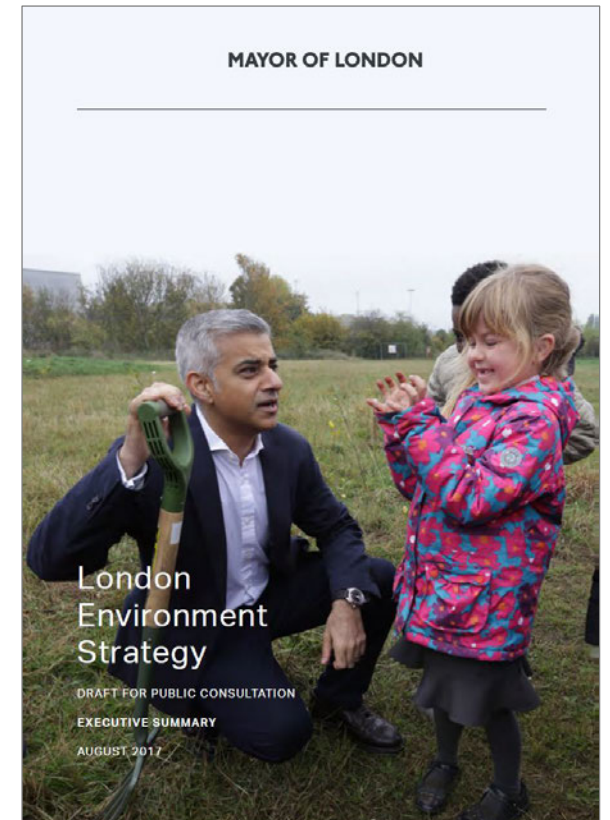
A CONVERSATION WITH THE
GLA



Current planning/regulatory context.

Environmental Strategy.

- Cleaner, local renewable energy
- Mayor to trial low carbon technologies i.e. heat pumps and batteries
- Target best air quality in a major city by 2050
- Considering *Air Quality Positive* standard
- Solar Action Plan



Current planning/regulatory context.

Draft New London Plan (2019).

Policy SI1: Improving air quality

Development proposals *should not*:

- lead to further deterioration of existing poor air quality.
- create new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits

(...) development briefs for large-scale development proposals subject to an EIA should propose methods of achieving an Air Quality Positive approach through the new development. Major development proposals must be at least air quality neutral and be submitted with an Air Quality Assessment.

Policy SI3: Energy Infrastructure

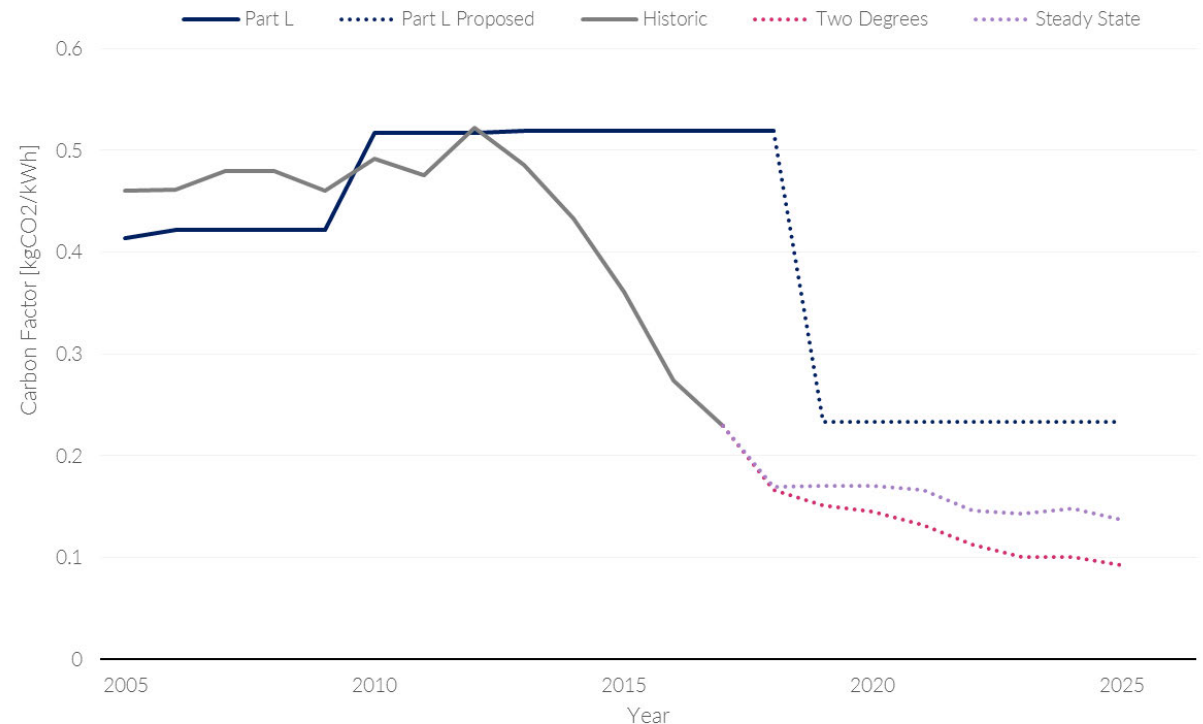
“...it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available.”



Current planning/regulatory context.

Grid Decarbonisation.

- Current Part L carbon content of grid electricity: **0.519 kgCO₂/kWh**
- Future Part L (SAP 10 – to be used in London from January 2019) carbon content of grid electricity: Expected **0.233 kgCO₂/kWh** (55% less than current Part L)
- Actual carbon content of grid electricity (end of 2018 projected): **0.180 kgCO₂/kWh** (65% less than current Part L)
- Future carbon content of grid electricity (2038 projected): **0.050 kgCO₂/kWh** (90% less than current Part L)



Energy Strategy.

Air Source Heat Pump.



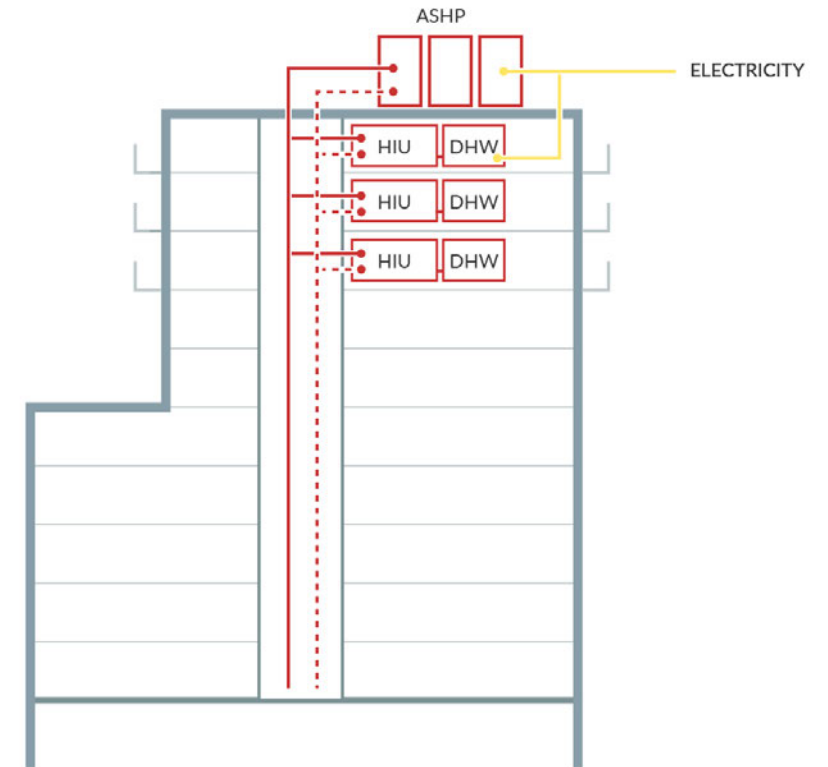
PROS

- Initial carbon savings
- Increase in carbon savings with grid decarbonisation
- No impact on local air quality
- Lower risk of corridor overheating
- Reduced size of GF plant

CONS

- Impact on electrical infrastructure (additional DNO substations / infrastructure reinforcement costs)
- More roof plant space required
- Larger utility cupboards
- Increased maintenance requirements
- Lower design life (typically 10/15 years)
- Auto de-frost function takes units off-line for periods

BUILDING BY
BUILDING ASHP






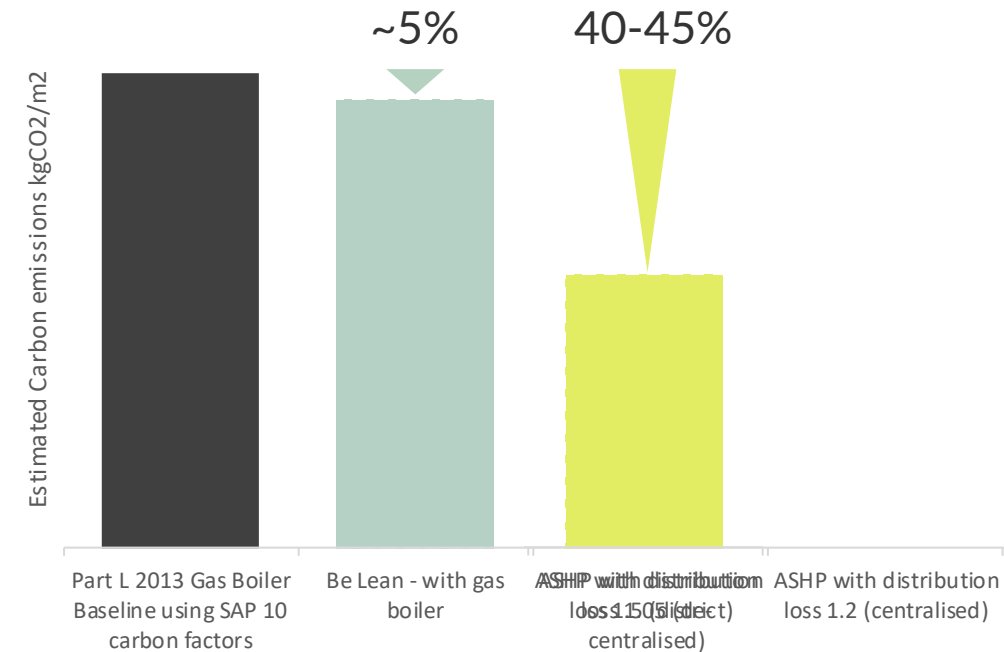
INDICATIVE SKETCH SHOWING SERVICING STRATEGY FOR THIS TYPE OF SYSTEM.

Carbon emission reductions using SAP 10 factors.

Indicative dwelling performance.

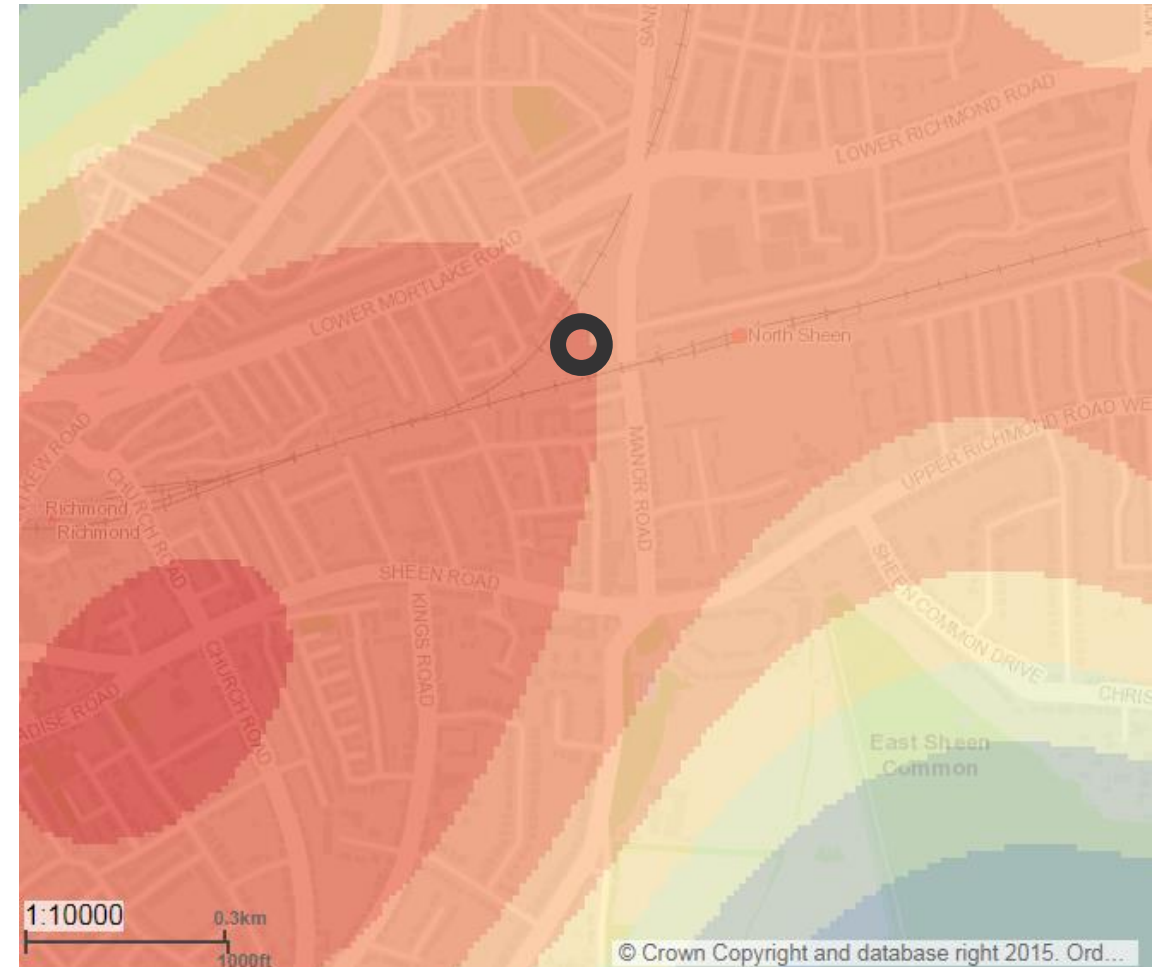
Legend

-  Gas Boiler Baseline
-  Be Lean - with gas boiler
-  Be Green - ASHP – de-centralised



Potential future district energy connection.

- No existing district energy networks in vicinity of the site
- Connections to potential future networks and/or near-by waste heat sources is facilitated by allowing space for heat interface units in the ground floor on a building-by-building basis, should a low-carbon network become available in the vicinity of the site in future.



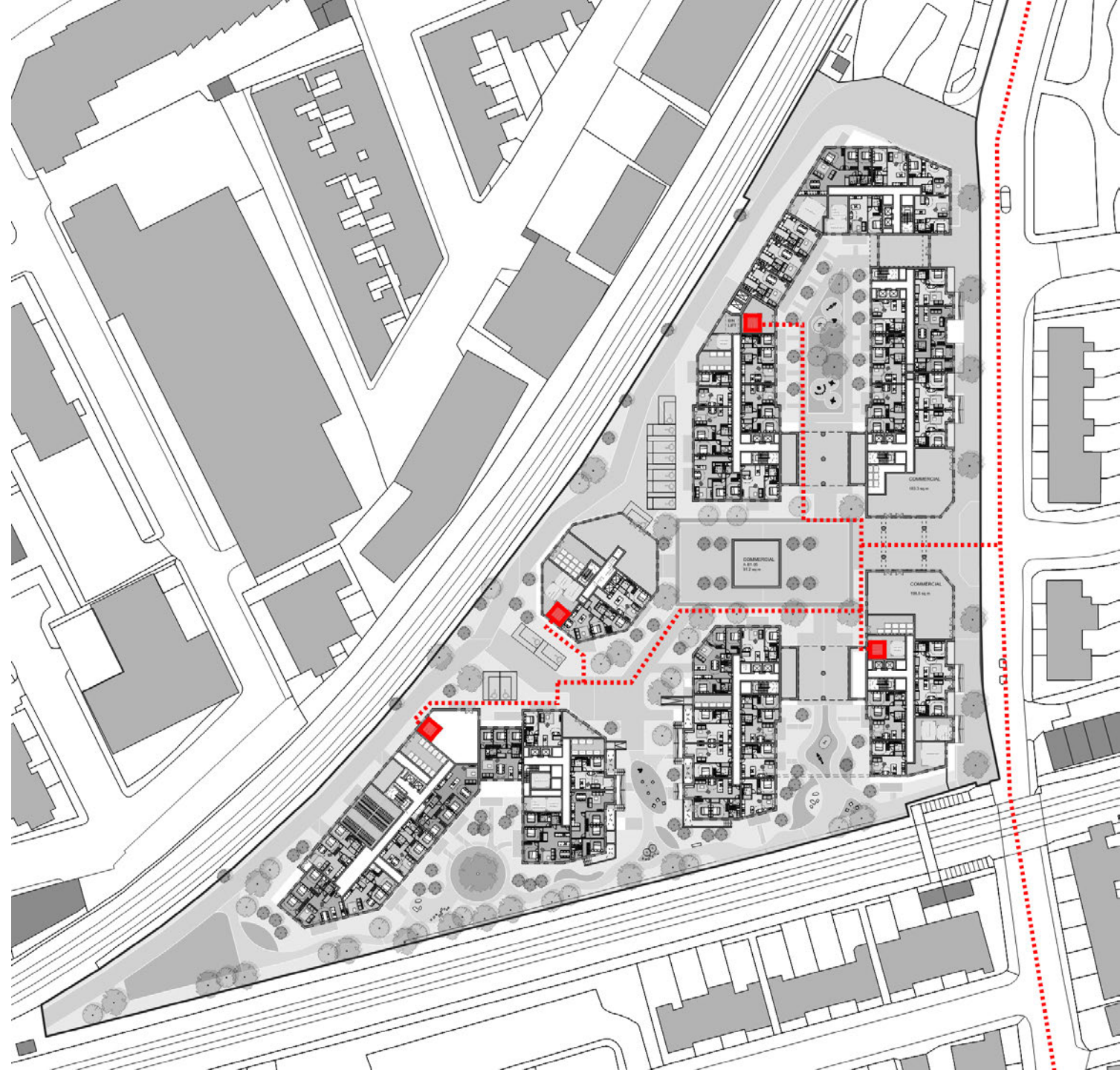
Proposed plant. Indicative layout.

- Shorter pipe runs
 - Minimised distribution losses
 - Minimised use of material
- Allows roof space for amenity and/or green/brown roof for all buildings
- Flexible for phasing of construction



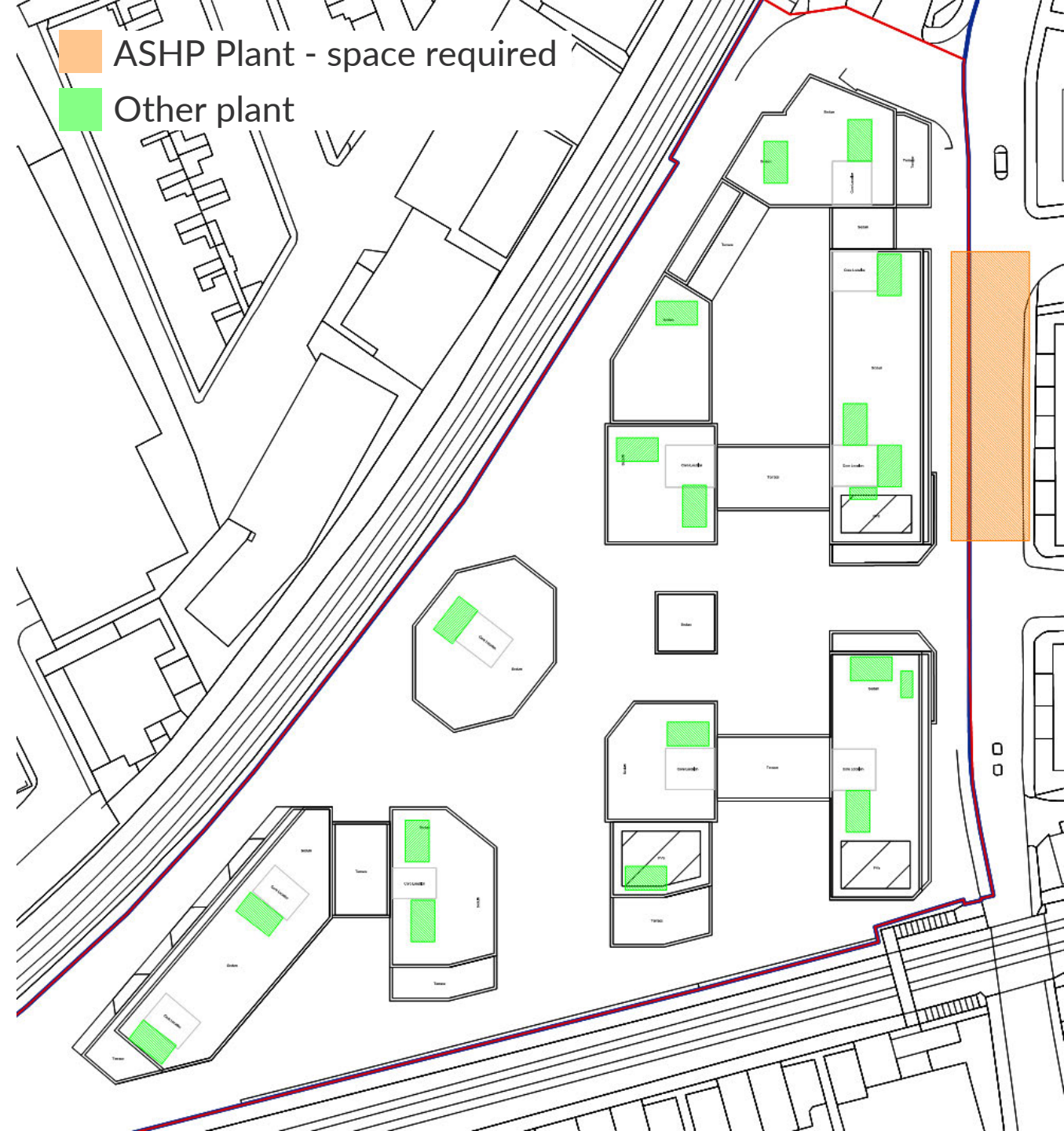
Potential future district energy connection.

- Space allowance for HIU made to all ground floors to enable potential future connection to district energy



Centralised plant. Indicative layout.






- Longer pipe runs
 - Greater distribution losses – especially when following the SAP10 methodology
 - Greater use of material
- Plant is not expected to fit on one roof, therefore would require either two locations, or a secondary ground floor location. ASHP cannot be stacked.
- Does not allow roof space for amenity and/or green/brown roof for all buildings
- Not flexible for phasing of construction

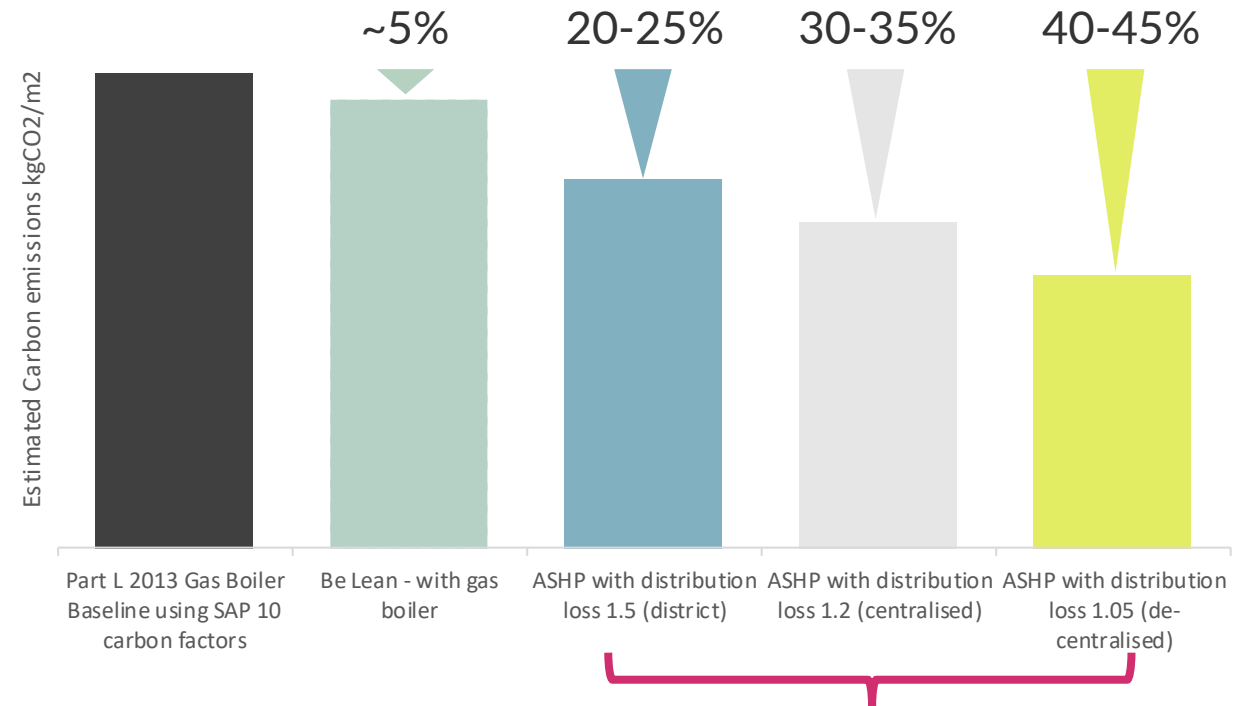


Carbon emission reductions using SAP 10 factors.

Indicative dwelling performance.


Legend


-  Gas Boiler Baseline
-  Be Lean - with gas boiler
-  Be Green - ASHP – district
-  Be Green - ASHP – centralised
-  Be Green - ASHP – de-centralised



Roof area appraisal.

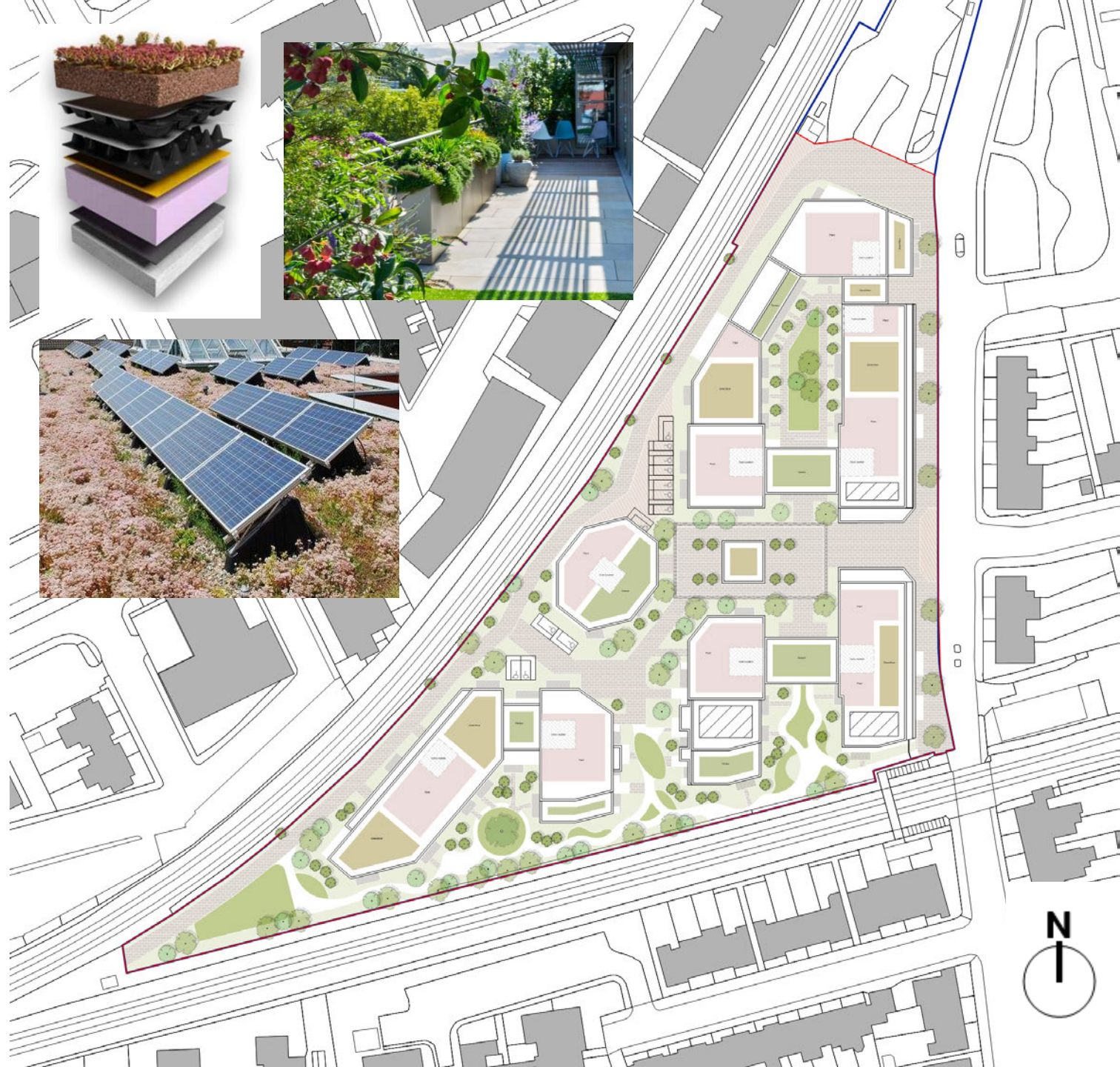
Legend

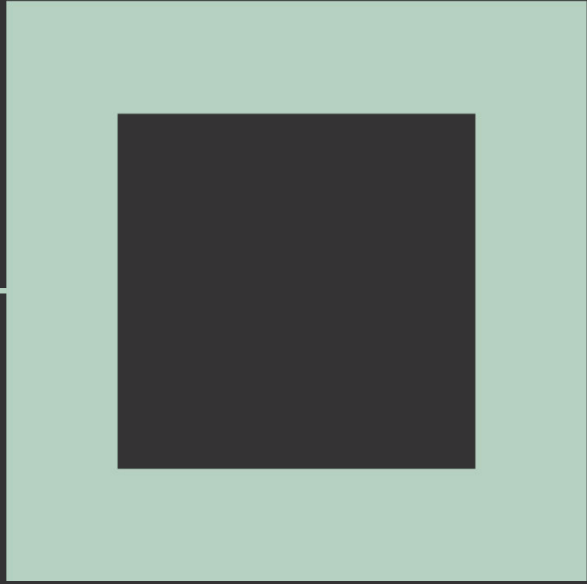
-  - Green / brown roof (sedum type), in combination with PV panels atop and/or blue roof underneath.
- The team will assess whether blue roof can also be included underneath mechanical plant space.
- Roof build-up thicknesses will be assessed against parameter plan heights.

 Residential amenity terrace.

 Plant space

 PV location





Thank you.
hoarelea.com

From: "[REDACTED] [REDACTED] (GVA)" <[REDACTED]@gva.co.uk>
Date: Thursday, 10 January 2019 at 18:19
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

I've been having a few issues with my emails, so I'm not sure if you received my response to your email below.

Just to confirm, that [REDACTED] will be available at 10am tomorrow.

Thank you,

[REDACTED]

[REDACTED] [REDACTED]
Principal Planner

GVA

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 10 January 2019 16:50
To: [REDACTED] [REDACTED] (GVA)
Subject: RE: GLA 4795 - Homebase Manor Road

Afternoon [REDACTED]

Our energy team have tried to contact [REDACTED] twice this week as requested.

Can I suggest tomorrow at 10am for [REDACTED] to expect a call. Let me know if this is too short notice and suggest a time to agree for one of our team to call him.

Many thanks

[REDACTED]

From: [REDACTED] [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 19 December 2018 14:22
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

We haven't invited anyone from Richmond.

That would be helpful if you could put our energy consultants in touch with your energy team. Our energy consultant won't attend tomorrow now but would like to take the opportunity to discuss directly with your team, as you suggest.

Contact details for [REDACTED] our energy consultant:

██████████
Senior Associate

██████████
Email ██████████ hoarelea.com

Kind regards,
██████████

██████████
Principal Planner

GVA

From: ██████████ [<mailto:██████████@london.gov.uk>]
Sent: 19 December 2018 13:42
To: ██████████ (GVA)
Subject: RE: GLA 4795 - Homebase Manor Road

Thanks ██████████

Is anyone attending from Richmond?

I'm afraid there is no one from energy available to attend the meeting tomorrow, but I can arrange to put them in touch with your energy consultants for a phone discussion if that would be useful?

Kind regards
██████████

From: ██████████ (GVA) <██████████@gva.co.uk>
Sent: 19 December 2018 13:06
To: ██████████ <██████████@london.gov.uk>
Subject: FW: GLA 4795 - Homebase Manor Road

Hi ██████████

Just to let you know that I will be attending tomorrow's meeting in place of ██████████

Kind regards,
██████████

██████████
Principal Planner

GVA

From: ██████████ (GVA)
Sent: 14 December 2018 11:20
To: ██████████
Subject: RE: GLA 4795 - Homebase Manor Road

Thanks [REDACTED]

Kind regards,

[REDACTED]

[REDACTED] [REDACTED]

Principal Planner

GVA

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 14 December 2018 11:15

To: [REDACTED] (GVA)

Subject: Re: GLA 4795 - Homebase Manor Road

Thanks [REDACTED] All received. I'll issue an agenda to you early next week.

Kind regards

[REDACTED]

From: "[REDACTED] (GVA)" <[\[REDACTED\]@gva.co.uk](mailto:[REDACTED]@gva.co.uk)>

Date: Friday, 14 December 2018 at 11:12

To: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

I've just sent you a WeTransfer with the Design Document. Hope you receive it ok.

Kind regards,

[REDACTED]

[REDACTED] [REDACTED]

Principal Planner

GVA

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]

Sent: 14 December 2018 11:04

To: [REDACTED] (GVA)

Subject: Re: GLA 4795 - Homebase Manor Road

Thanks [REDACTED] – I didn't receive the Design Doc email

Perhaps you could file transfer it for me?

Thanks

[REDACTED]

From: "[REDACTED] (GVA)" <[\[REDACTED\]@gva.co.uk](mailto:[REDACTED]@gva.co.uk)>

Date: Friday, 14 December 2018 at 10:58

To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: FW: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

I just wanted to check you received both the emails below – I'm conscious they are quite large attachments.

Kind regards,

[REDACTED]

[REDACTED] [REDACTED]

Principal Planner

GVA

From: [REDACTED] [REDACTED] (GVA)
Sent: 14 December 2018 08:48
To: [REDACTED]
Cc: [REDACTED] [REDACTED] (GVA); [REDACTED] [REDACTED] (GVA)
Subject: FW: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

Further to my email below, please find attached the Design Document prepared by Assael. I would be grateful if you could confirm receipt of these two emails (due to size).

Kind regards,

[REDACTED]

[REDACTED] [REDACTED]

Principal Planner

GVA

From: [REDACTED] [REDACTED] (GVA)
Sent: 14 December 2018 08:46
To: [REDACTED]
Cc: [REDACTED] [REDACTED] (GVA); [REDACTED] [REDACTED] (GVA)
Subject: FW: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

In advance of our meeting on 20th December, please find attached the following documents:

- . Design Document prepared by Assael (to follow in a separate email due to size).
- . Planning Obligations note.
- . Energy Strategy note.
- . Note of TfL meeting.
- . Letter from TfL.

Could I also add [REDACTED] (another representative for LCG Longbow) to our attendee list please?

Kind regards,

[REDACTED]

[REDACTED] [REDACTED]

Principal Planner

GVA

From: [REDACTED] [REDACTED] (GVA)

Sent: 12 December 2018 12:09

To: [REDACTED]

Subject: FW: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

Further to my email below, the attendees from Avanton will be [REDACTED] and [REDACTED]
[REDACTED]

Kind regards,

[REDACTED]

[REDACTED] [REDACTED]

Principal Planner

GVA

From: [REDACTED] [REDACTED] (GVA)

Sent: 12 December 2018 11:17

To: [REDACTED]

Cc: [REDACTED] [REDACTED] (GVA)

Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

We will send you the documents tomorrow.

The attendees are:

- . Avanton (I will confirm shortly)
- . ICG Longbow ([REDACTED] [REDACTED])
- . Assael ([REDACTED] [REDACTED])
- . GVA ([REDACTED] [REDACTED] [REDACTED])
- . Hoare Lea ([REDACTED] [REDACTED])

We will include a note on energy in our pre-app pack (responding to the comments previously raised – concerning the Air Source Heat Pumps), but we would be grateful if a representative from your energy team could also attend.

Kind regards,

[REDACTED]

[REDACTED] [REDACTED]

Principal Planner

GVA

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]
Sent: 12 December 2018 09:52
To: [REDACTED] (GVA)
Cc: [REDACTED] (GVA)
Subject: RE: GLA 4795 - Homebase Manor Road

Morning [REDACTED]

Can you let me know when I can expect to receive the revised proposals and documents that you wish to discuss at next week's follow up?

If you could also confirm the attendees at some point. You have mentioned your energy consultant attending – I have previously sent over to you our energy team's initial comments – if there is a significant issue on energy and you anticipate needing a representative of our energy team to attend please can you advise with your position.

Many thanks

[REDACTED]

From: [REDACTED] (GVA) <[\[REDACTED\]@gva.co.uk](mailto:[REDACTED]@gva.co.uk)>
Sent: 22 November 2018 15:48
To: Pre-applications <Pre-applications@london.gov.uk>; [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Cc: [REDACTED] (GVA) <[\[REDACTED\]@gva.co.uk](mailto:[REDACTED]@gva.co.uk)>
Subject: RE: GLA 4795 - Homebase Manor Road

Hi [REDACTED]

Thank you for your email below. We would like confirm our attendance at the meeting on 20th December. We anticipate there being a representative from Avanton and ICG Longbow (the applicant), GVA (Planning), Assael (Architects), Sanderson (transport) and Hoare Lea (Energy) but we will confirm this nearer the time.

To confirm, the applicant does not operate a purchase order system. For the previous meeting on Homebase Manor Road, I understand that the GLA raised an invoice and the applicant paid by bank transfer. Could you we follow the same invoicing procedure please?

Kind regards,

[REDACTED]

[REDACTED]
Principal Planner

GVA

From: pre-applications@london.gov.uk [<mailto:pre-applications@london.gov.uk>]
Sent: 22 November 2018 14:06
To: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk); [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk); [REDACTED] (GVA); [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)
Subject: GLA 4795 - Homebase Manor Road

Dear [REDACTED]

GLA reference number: 4795

Site Name: Homebase Manor Road

Site Address: 84 Manor Road, North Sheen, TW9 1YB

LB: Richmond upon Thames

Proposal Description: Redevelopment of the site to provide a residential led scheme comprising 381 units, commercial floor space and new public realm.

On 15 November 2018 the Development Management Unit received your request for a follow-up meeting for the above pre-planning application proposal. The case officer assigned to this case is [REDACTED]

We can only comment on information provided in advance of the meeting. Where we have no or limited information we will not be able to provide a comprehensive assessment. The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

The advice letter will only address issues that you have sent documentation on. The case officer will carry out a site visit and assess the documentation prior to the meeting. A meeting note will be sent to you two working days prior to the meeting which will outline the issues that will be discussed.

Finance

As per GLA Financial Regulations we can only confirm the meeting date upon receiving a correct application form.

The form you have sent to us is correct and we can confirm the meeting date upon your acceptance of the proposed meeting date and time at the bottom of this email.

In order to invoice the company paying for the meeting, we need to confirm whether they use a purchase order system. **Please could you confirm this?**

If they do use a purchase order system, then a PO will need to be raised by them and sent to accountspayable@tfl.gov.uk before the meeting.

Cancellation

If, due to circumstances out of our control, we cancel the meeting we will reschedule for another time as soon as practical. Meetings can be rescheduled at your request up to 48 hours prior. The fee is non-refundable on cancellation.

I can offer a tentative date and time of **Thursday 20 December @ 10:00**. Please let me know if this is acceptable and who will be attending.

Regards



Planning Support
Greater London Authority

#LondonIsOpen

[REDACTED]

From: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 21 November 2018 09:17
To: [REDACTED]
Cc: [REDACTED] (GVA)
Subject: RE: Homebase Manor Road, Richmond - GLA/4795

Hi [REDACTED]
Yes please, just officer level advice at this stage. We mainly want the meeting to focus on design. As before, we will send you a pack of information a week in advance of the meeting date.
Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED]@gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 21 November 2018 09:17
To: [REDACTED] (GVA)
Cc: [REDACTED] (GVA)
Subject: RE: Homebase Manor Road, Richmond - GLA/4795

Okay thanks.

If you need someone from viability then we will need a position statement at least a week in advance of the meeting. I think you are probably just seeking officer level advice at this stage though?

Thanks

From: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 21 November 2018 09:08
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Subject: RE: Homebase Manor Road, Richmond - GLA/4795

Hi [REDACTED]
The purpose of the meeting is for a design update but we would also like to have a high level discussion about affordable housing provision/viability.
Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED]@gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 21 November 2018 09:08
To: [REDACTED] (GVA)

Cc: [REDACTED] (GVA)
Subject: RE: Homebase Manor Road, Richmond - GLA/4795
Morning [REDACTED]
I will follow up.

Is this specifically for viability / affordable housing matters or a general / all other matters pre-app?
Apologies if you've sent this info, I've not caught up on this yet.
Thanks
[REDACTED]

From: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 21 November 2018 08:59
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Subject: FW: Homebase Manor Road, Richmond - GLA/4795

Hi [REDACTED]
I believe the Pre-applications team now have everything they need to process our request for a follow-up meeting (latest correspondence attached for reference). I wondered if, in the meantime, we could try to get a date in the diary in December please?
Kind regards,
[REDACTED]
[REDACTED]

Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED]@gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 15 November 2018 10:30
To: [REDACTED]
Cc: [REDACTED] (GVA)
Subject: Homebase Manor Road, Richmond - GLA/4795
Hi [REDACTED]

We would like to arrange a follow-up pre-app meeting for December to discuss the changes to the Homebase Manor Road scheme.
I've registered to request this through the 'PAWS' system but am waiting for confirmation of my login details.
In the meantime, I wondered if we could agree a date please?
Do you have any availability in the weeks commencing 3rd or 10th December?
Kind regards,
[REDACTED]
[REDACTED]

Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED]@gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

GVA



[REDACTED]

From: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 15 November 2018 17:19
To: Pre-applications
Cc: [REDACTED] (GVA)
Subject: FW: Homebase Manor Road, Richmond - GLA/4795
Attachments: Payment form 2 - signed.pdf

Hi [REDACTED]
Please find attached a signed version of the payment form.
Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED]@gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 15 November 2018 15:09
To: 'Pre-applications'; [REDACTED]
Cc: [REDACTED] (GVA)
Subject: RE: Homebase Manor Road, Richmond - GLA/4795

Hi [REDACTED]
Thank you for confirming receipt. I'll get the signature and send the amended version to you as soon as possible.
Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED]@gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: Pre-applications [<mailto:Pre-applications@london.gov.uk>]
Sent: 15 November 2018 15:05
To: [REDACTED] (GVA); [REDACTED]
Cc: Pre-applications; [REDACTED] (GVA)
Subject: RE: Homebase Manor Road, Richmond - GLA/4795

Hi [REDACTED]
We have received your application on PAWS and will set up a meeting as soon as it has been allocated.
By the way, you will need to re-send the payment form as the one you sent has not been signed.
Kind regards

[REDACTED]
Planning Support Officer
Development, Enterprise & Environment | Planning
Greater London Authority
City Hall, The Queens Walk, London SE1 2AA
020 7084 [REDACTED]

From: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 15 November 2018 14:38
To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: Pre-applications <Pre-applications@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]
(GVA) <[REDACTED]@gva.co.uk>

Subject: FW: Homebase Manor Road, Richmond - GLA/4795

Hi [REDACTED]
In [REDACTED] absence, are you able to advise on availability for a follow-up pre-app meeting in December for the Homebase Manor Road scheme please?

Since my email below I have been able to log a request on the 'PAWS' system (reference GLA/4795) – hopefully you should receive this soon.

Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 15 November 2018 10:30
To: [REDACTED]
Cc: [REDACTED] (GVA)
Subject: Homebase Manor Road, Richmond - GLA/4795

Hi [REDACTED]
We would like to arrange a follow-up pre-app meeting for December to discuss the changes to the Homebase Manor Road scheme.
I've registered to request this through the 'PAWS' system but am waiting for confirmation of my login details.
In the meantime, I wondered if we could agree a date please?
Do you have any availability in the weeks commencing 3rd or 10th December?

Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

GREATER **LONDON** AUTHORITY

Pre-planning application payment form

Details of company paying invoice

Company name: Avanton Richmond Developments Ltd

Company registration number: 10993331

Company registered address including post code:

56 Queen Anne Street, London, W1G 8LA

Correspondence address (if different to company registered address):

Contact name: [REDACTED]

Telephone number: [REDACTED]

Email address: [REDACTED]@gva.co.uk

I, the undersigned, confirm that I have requested a pre-planning application advice meeting for (site name) Homebase Manor Road and that I will pay the full fee of £2000 (£7,500 for an initial meeting, £2,000 for each follow-up [plus VAT at the standard rate]) on receipt of an invoice.

Signed: [REDACTED]

Print name: [REDACTED]

Company name: Avanton Richmond Developments Ltd

Date: 15/11/18

Invoice Procedure

HOMEBASE – MANOR ROAD - RICHMOND

Payment Terms

Payment terms are 28 days. Any enquiries about unpaid invoices must be directed to GVA Second London Wall.

Timing

Please issue invoices on the last working day of the month for the work to be billed.

Invoicing details

The billing address for invoices in connection with your appointment is:

Avanton Richmond Developments Ltd
56 Queen Anne Street,
London
W1G 8LA

Or such other person as we notify from time to time

Electronic copies should be emailed on the day they are issued to accounts@avanton.co.uk and [REDACTED]@slw.co.uk copied or such other person as we notify from time to time

Hard copies are not necessary but can be posted the same day to the following address:

GVA Second London Wall
65 Gresham Street
London
EC2V 7NQ
Attention: [REDACTED]

[REDACTED]

From: Pre-applications@london.gov.uk
Sent: 09 November 2018 13:17
To: [REDACTED]@slw.co.uk; [REDACTED]quod.com;
[REDACTED]@tfl.gov.uk; [REDACTED]@tfl.gov.uk; Lucinda Turner; [REDACTED]@tfl.gov.uk
Cc: Pre-applications; [REDACTED] Planning
Subject: GLA 4795 - Homebase, Manor Road
Attachments: 4795 Pre-app Advice Letter and Report.pdf

Dear all


Please find attached a copy of the Pre-application meeting response letter relating to the above site in the London Borough of Richmond upon Thames .

Kind regards

[REDACTED]
[REDACTED]
Planning Support Team
Development, Enterprise & Environment
Greater London Authority
City Hall, The Queens Walk, London SE1 2AA

[REDACTED]
[REDACTED]@london.gov.uk
Web: www.london.gov.uk

GREATER **LONDON** AUTHORITY


GVA
65 Gresham Street
London
EC2V 7NQ

Department: Planning

Your reference:

Our reference: GLA/4795/LB

Date: 8 November 2018

Dear 

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: Homebase, Manor Road
LPA: London Borough of Richmond
Our reference: GLA/4795

Further to the pre-planning application meeting held on 10 October 2018, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely


John Finlayson
Head of Development Management

cc London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Taylor, TfL

8 November 2018

Homebase Site, Manor Road

In the London Borough of Richmond-upon-Thames

The proposal

Redevelopment of the site to provide a residential led scheme comprising 381 units, commercial floorspace and new public realm.

The applicant

The applicants are **Avanton** and the architect is **Assael**.

Context

1 On 10 October 2018 a pre-planning application meeting to discuss the above proposal for the above site was held at City Hall, with the following attendees:

GLA Group

[REDACTED]	Senior Strategic Planner - Case Officer
[REDACTED]	Team Leader
[REDACTED] [REDACTED]	Senior Strategic Planner - Urban Design
[REDACTED] [REDACTED]	Planning, TfL

Applicant

[REDACTED]	ICG Longbow
[REDACTED] [REDACTED]	ICG Longbow
[REDACTED]	Avanton
[REDACTED]	Avanton
[REDACTED]	Assael Architects
[REDACTED]	Assael Architects
[REDACTED]	Assael Architects
[REDACTED]	Gillespies Landscape
[REDACTED]	Sanderson Associates Highways
[REDACTED] [REDACTED]	Hoare Lea Energy and Sustainability
[REDACTED]	GVA Planning
[REDACTED]	GVA Planning

LPA

[REDACTED] [REDACTED]	London Borough of Richmond-upon-Thames - Case Officer
-----------------------	-------------------------------------------------------

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3 The site is located in North Sheen on Manor Road in the London Borough of Richmond on Thames. The site is 1.5 hectares in size and bounded by railway lines to the north and south. The east of the site is bounded by Manor Road. North Sheen Bus Terminus is located to the north.

4 Currently the site comprises of a large, low density retail unit with a large amount of surface level car parking. To the east of the site is an additional low density retail unit which is currently occupied by a Sainsbury's store.

5 There are no listed buildings within the vicinity of the site. The Sheendale Road Conservation Area and Sheen Road Richmond Conservation Area are to the west and south west respectively.

6 The site sits within Richmond's character area 6 'Old Gas Works', as defined in the Richmond and Richmond Hill Village Planning Guidance SPD (June 2016).

7 The site is located immediately south of the A316 Manor Circus which forms part of the Transport for London Road Network (TLRN). A level crossing is located on Manor Road immediately south of the site boundary.

8 The entrance to North Sheen rail station is located on the opposite side of Manor Road near the site's southern boundary, there are also 10 bus routes within an acceptable walk distance with stops on Manor Road and Lower Mortlake Road. Based on TfL's Webcat toolkit the application site has a public transport accessibility level (PTAL) of 5, on a scale of 1 to 6b where 6b is the most accessible.

Details of the proposal

9 The scheme proposes redevelopment of the site to provide a residential led scheme of 381 residential units (the applicant intends to include 35% affordable housing subject to viability) and 522 sq.m. of flexible commercial floorspace at ground floor facing a new public square with a retail kiosk. The proposed buildings range from four to seven storeys in height and include associated cycle parking, car parking, playspace, landscaping and public realm improvements.

10 The applicant also has an interest in land directly to the north of the application site, the North Sheen bus depot, which does not form part of the scheme proposals at this time.

11 The proposal would be referable to the Mayor under Categories 1A and 1B of the Schedule of the 2008 Order:

- 1A 'Development which comprises or includes the provision of more than 150 houses, flats or houses and flats';
- 1B 'Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres'

Strategic planning issues and relevant policies and guidance

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Richmond Local Plan 2018; and, the London Plan 2016 (Consolidated with Alterations since 2011).

13 The following are relevant material considerations:

- Revised National Planning Policy Framework (July 2018);
- National Planning Policy Guidance;
- Draft London Plan (consultation draft December 2017, incorporating early suggested changes published August 2018) which should be taken into account as explained in the NPPF; and
- Richmond and Richmond Hill Village Planning Guidance (June 2016).

14 The relevant strategic issues and corresponding policies are as follows:

- Housing *London Plan; Affordable Housing and Viability SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG.*
- Retail *London Plan.*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG.*
- Climate change *London Plan; Sustainable Design and Construction SPG; London Environment Strategy.*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG; the draft Mayor's Transport Strategy.*
- Water *London Plan; London Environment Strategy.*

Summary of meeting discussion

15 Following a presentation of the proposed scheme from the applicant team, the meeting discussions covered strategic issues with respect to the following: principle of development; housing and affordable housing; urban design; inclusive access; transport; climate change; and flood risk, drainage and water. GLA officer advice in respect of these issues is set out within the sections that follow.

Principle of development

16 London Plan Policy 3.3 and draft London Plan Policy H1 seek to increase the supply of housing in the capital. Policy H1 specifically identifies car parks and low-density retail parks as a source of capacity for housing delivery. Richmond are not seeking to retain a large quantum of retail in this location. There is no objection to the loss of the retail use, which is not located in a designated town centre.

17 The proposals would provide 381 homes, which equates to 121% of Richmond's annual monitoring target of 315 in the London Plan (and 47% of the annual monitoring target of 811 set out in the draft London Plan). The principle of the proposed residential use on this accessible, previously developed site is strongly supported, subject to addressing the issues raised within this report.

18 The proposals include 522 sq.m. of commercial floorspace. The applicant has not confirmed the specific use classes but indicated this could include retail, office or community space. Given the existing context, the provision of small-scale supporting commercial uses to contribute to a sense of place is supported.

Affordable Housing

19 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. and Policy H7 provides a flexibly prescribed tenure mix of: 30% social rent / London Affordable Rent; 30% intermediate products; and, 40% to be determined by the relevant local authority based on identified need and consistency with the definition of affordable housing.

20 The draft London Plan and the Mayor's Affordable Housing and Viability Supplementary Planning Guidance seek to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6; schemes that provide 35% affordable housing by habitable room without public subsidy and that meet other criteria, including tenure, are not required to submit viability information to the GLA. Such applications are also exempted from a late stage review mechanism; this is known as the Fast Track route.

21 On the date of this report, the applicant has not submitted any information on the proposed affordable housing provision as part of this request for pre-application advice.

22 If a 35% affordable housing by habitable room offering is made by the applicant in accordance with the Mayor's Affordable Housing and Viability SPG and the draft London Plan the scheme would qualify for the Fast Track Route. In addition, the affordability of the units must accord with the requirements of Policy H7 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG and the London Plan Annual Monitoring Report 14 for 2017/18. Details of the proposed social and intermediate rents must therefore be submitted, and the applicant should note that London Affordable Rent and London Living Rent are the Mayor's preferred affordable housing tenures.

23 The applicant should investigate Mayoral grant funding opportunities as part of this process. If the application cannot be assessed under the Fast Track route, a financial viability assessment will be required.

24 In any application, the applicant must provide full details of the tenure mix, details of any rent levels and any income thresholds. In addition, the applicant must confirm whether they have attempted to increase the affordable housing offer through accessing grant.

25 In accordance with Policy H6 of the draft London Plan and the Mayor's SPG, the S106 agreement must include an early stage viability review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission. Moreover, if the proposals cannot be assessed under the Fast Track Route, a late stage review will also be required and secured within the S106. A draft of the S106 agreement must be agreed with GLA officers during the course of the application; example clauses are provided within the SPG.

26 Richmond Council will be expected to publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information.

Housing mix

27 London Plan Policy 3.8 and draft London Plan Policy H12 encourage a full range of housing choice. Draft London Plan Policy H12 recognises that central or urban sites may be most appropriate for schemes with a significant number of one and two beds. Owing to the accessible location, the proposed housing mix does not raise any strategic planning concerns.

Residential quality

28 London Plan Policy 3.5 and Policy D4 of the draft London Plan promote quality in new housing provision, with further guidance provided in the Housing SPG. The scheme should continue to be designed to meet and exceed London Plan and draft London Plan minimum residential space standards.

Children's play space

29 Policy 3.6 of the London Plan and Policy S4 of the draft London Plan, seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum. Further details demonstrating full compliance should be provided in any application brought forward.

Urban design

30 The broad layout principles are supported. The pedestrian and cycle routes to and from the site should be clearly defined as part of the public realm strategy.

31 Provision of a public square is welcomed but its size and the uses that flank it should be considered further.

32 The arrangement of blocks has potential to create clear distinction between public and private realm but the openings to courtyard spaces risks detracting from this and needs careful consideration.

33 The green spaces between the two southern blocks and railway need to be fully resolved, avoiding any 'left over' spaces or poorly overlooked areas that could encourage anti-social behaviour.

34 The spaces at the base of the 'jewel' building are poorly defined at present and would benefit from further refinement, ensuring blue badge parking is fully incorporated into the landscaping strategy.

35 The applicant should explore relocating the 'pavilion' building into the base of the 'jewel' building. This would create potential for a community focussed destination/landmark and would open up the square.

36 The inclusion of ground floor duplexes is welcomed and will help to activate the main street frontage. The applicant should explore locating additional duplex units along the railway edge of the south eastern block to create a 'mews' type environment and encourage passive surveillance along this edge. This would also reduce the amount of single aspect units facing onto the railway

37 At the upper levels, residential layouts are efficient with a good distribution of cores creating good core to unit ratios.

38 The inclusion of 'through units' to maximise the proportion of dual aspect across the scheme is welcomed, however, they appear very narrow and deep.

39 Internal layouts should be provided to ensure that all units will provide liveable environments with good access to natural daylight. ADF testing should be undertaken to ensure lower level inward facing units in particular receive adequate daylight penetration to living spaces. All units should also achieve 2.5 metre minimum floor to ceiling heights.

40 The heights and massing strategy responds positively to the existing low-rise context, with the scale dropping down to respect neighbouring properties along the south and eastern edges. Given the high accessibility of the site, there is scope for additional height and this should be fully explored, in particular, there is strong potential to increase the height of the 'jewel' building. Options should be tested in local townscape views in tandem with daylight/sunlight analysis.

41 A taller building would be beneficial in terms of landmarking the proposed public square and would also improve on the building's proportions which appear squat at present.

42 The simple and refined approach to the architecture is welcomed and the intention to explore the use of varying tones of brickwork to create character areas across the site is supported

43 The applicant is encouraged to take the scheme to the Design Review Panel at the earliest opportunity.

Inclusive access

44 London Plan Policy 3.8 and Policy D5 of the draft London Plan require that ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The location of wheelchair units should be indicated on the plans and provided across tenures and unit sizes.

45 Any application must provide full details of the accessibility and how any level changes are managed for both residential and retail accommodation.

Climate change

46 The energy assessment planning guidance is available on the GLA website (October 2018). This provides further information on the revised targets to take into account Part L 2013 of the Building Regulations. It also provides details on the information that should be submitted within the energy statement to be submitted at stage 1. See link for the latest guidance published in October 2018 <https://www.london.gov.uk/WHAT-WE-DO/PLANNING/PLANNING-APPLICATIONS-AND-DECISIONS/PRE-PLANNING-APPLICATION-MEETING-SERVICE-0>

47 The following targets are now in effect, as set out in the revised energy assessment guidance:

- Residential developments – Zero carbon (as defined in section 5.2 of the Housing SPG) against Part L 2013
- Commercial/Non-domestic – 35% below Part L 2013

48 The carbon emission figures should be reported against a Part L 2013 baseline. The March 2016 guidance provides details on presenting carbon emission information separately for domestic

and non-domestic elements of the development in light of the zero carbon target for domestic developments. The baseline, as per the GLA guidance, should be modelled assuming gas boiler systems for heating purposes.

49 The applicant should commit to meeting Part L 2013 by efficiency measures alone for both domestic and non-domestic elements separately. Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

50 Evidence will be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with Policy 5.9. The applicant should particularly consider how best to mitigate any restrictions posed by, for example, local air quality or noise issues, ground floor apartments and single aspect units. Dynamic overheating modelling in line with CIBSE Guidance TM59 for all TM49 weather files will be carried out and this is welcomed.

51 An area weighted average for the actual and notional cooling demand should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional (MJ/m²).

52 A domestic overheating checklist is included in the GLA's energy guidance which should be completed and used to identify potential overheating risk and passive responses early in the design process. The completed checklist should be included in the appendix of the energy statement.

53 No proposed or existing district heating networks are currently available. The site should be future proofed for connection to a potential network and the means in place to futureproof the site should be outlined.

54 In light of the policy and grid related changes, the applicant is proposing an ASHP solution for heating purposes. This is supported however further information on the heat pump operation should be provided to establish the technology's performance:

55 An estimate of the heating and/or cooling energy the ASHP would provide to the development and the electricity the heat pump would require for this purpose

56 Details of the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER), which should be used in the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water). Details of the assumptions should be included in the energy assessment, including manufacturer datasheets showing performance under test conditions for the specific source and sink temperatures of the proposed development and assumptions for hours spent under changing source temperatures.

57 Confirmation is required as to whether any additional technology is required for hot water top up and how this has been incorporated into the energy modelling assumption, as is an estimate of the expected heating costs to occupants, demonstrating that the costs have been minimised through energy efficient design.

58 Confirmation is required that end-users will be supplied with regular information to control and operate the system e.g. at point of occupancy and maintenance visits, along with the expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently. The applicant should confirm the proposed approach to generating domestic hot water and the integration of thermal storage.

59 A commitment should be made to monitor the performance of the heat pump system post-construction to ensure it is achieving the expected performance approved during planning.

60 The applicant has stated that a building-by-building approach is being proposed. This is not considered acceptable and the site should be served by a single energy centre. The applicant should also commit to providing a site wide heating network where all uses and buildings on site will be connected to. A drawing/schematic indicating that all buildings are connected to the sitewide network should be provided. A plan showing the size, internal layout and proposed location of the energy centre should be provided.

61 In line with Policy 5.7 the applicant should investigate the inclusion of all other on-site renewable energy generation technologies. Solar technologies are proposed; a detailed plan showing the proposed location of the installation should be provided. The applicant should additionally demonstrate that the site's full potential for a solar PV installation has been maximised.

Flood Risk, Drainage and Water

Flood Risk

62 The site is greater than 1 hectare in area. Under the NPPF, a Flood Risk Assessment (FRA) will need to accompany the application.

63 Environment Agency mapping shows parts of the site to be at high risk of flooding from surface water. Other forms of flooding may also present a risk. The FRA should assess all sources of flood risk in relation to London Plan Policy 5.12 and draft London Plan policy SI12.

64 Where the site is found to be at medium or high risk of flooding from at least one source the FRA should also consider the need for flood resilience and emergency planning measures.

Sustainable Drainage

65 The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy 5.13 and draft London Plan policy SI13. This is particularly important given the surface water flood risk in the area. Where greenfield runoff rates are not feasible and robust justification is provided, a discharge rate of three times greenfield rate may be acceptable.

66 The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy set out in London Plan Policy 5.13 and draft London Plan policy SI13. Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, and permeable paving into the landscape, providing amenity and water quality benefits.

Water Efficiency

67 The residential components of the development should achieve a water consumption of less than 105l/person/day, in line with London Plan policy 5.15 and draft London Plan policy SI5.

68 The non-residential components of the development should achieve the equivalent of an 'Excellent' rating on the water elements of BREEAM, in line with draft London Plan policy SI5.

69 Water reuse should be considered for inclusion in the development to meet both water efficiency and sustainable drainage requirements.

Transport

70 A robust transport assessment should be submitted with the planning application in accordance with TfL's Transport Assessment Best Practice Guidance: <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

71 This should contain a multi-modal trip generation assessment and depending on the likely development impact. Mitigation measures / contributions to maintain or enhance the surrounding transport network may be required as a result. The TRICS database will be used to determine total person trips for the proposed development uses. Only London survey sites should be used for the calculations.

72 There will be no direct vehicular access to the site from the Transport for London Road Network. It is proposed to maintain the existing site vehicular access and the applicant should demonstrate that the development will not impact on the operation of the existing bus terminus.

73 The development will be car free, which is welcomed. The applicant should explore reducing the 25 spaces reserved for disabled users to bring the provision in line with draft London Plan standards. Electric Vehicle Charging Points (EVCP) including passive provision are welcomed.

74 Cycle parking provision should be in line with draft London Plan standards. Cycle stores should be broken up into smaller areas for added security. Short-stay cycle parking should be located in close proximity to building entrances of all buildings to provide convenience and choice for all users.

75 The applicant should ensure that the Healthy Streets approach is considered both throughout the site and within the local area, including pedestrian and cycle routes to all transport nodes. Travel planning, and servicing and construction management will all need to be covered in the transport assessment.

76 Mayoral CIL is payable at a rate of £50 per square metre in the London Borough of Richmond upon Thames.

77 Any mitigation measures relating to TfL infrastructure and services must be secured through the s106 agreement, it may be appropriate for TfL to be a signatory in order to receive financial contributions and obligations relating to transport.

Conclusion

78 The proposed redevelopment of the site to provide a residential-led scheme comprising 381 units and 522 sq.m. commercial floorspace is supported in principle and the scale and massing is appropriate, with scope for additional height. Issues relating to affordable housing; urban design; inclusive access; climate change; flood risk, drainage and water; and transport must also be addressed in order to make the proposals compliant with the London Plan and draft London Plan.

for further information contact GLA Planning Unit:

██████ **Team Leader**

020 7983 █████ email █████@london.gov.uk

██████ **Senior Strategic Planner (case officer)**

020 7084 █████ email █████@london.gov.uk

[REDACTED]

From: [REDACTED]
Sent: 05 November 2018 12:44
To: [REDACTED] (GVA)
Cc: [REDACTED] (GVA)
Subject: RE: Homebase Manor Road, Richmond - pre-app

[REDACTED]

The report is in final form for sign off and all being well should be issued this week.

Kind regards
[REDACTED]

From: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 31 October 2018 09:02
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Subject: RE: Homebase Manor Road, Richmond - pre-app

Hi [REDACTED]

Many thanks for sending across the flood risk comments below.

Can you please let me know your timescales for issuing your formal pre-application meeting response letter?

Kind regards
[REDACTED]

[REDACTED]
Associate

GVA

T +44 (0)20 [REDACTED] | M +44 (0) [REDACTED]
[REDACTED] gva.co.uk | www.gva.co.uk

65 Gresham Street, London EC2V 7NQ

From: [REDACTED] [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]
Sent: 15 October 2018 10:58
To: [REDACTED] (GVA)
Cc: [REDACTED] (GVA)
Subject: RE: Homebase Manor Road, Richmond - pre-app

Morning [REDACTED]

Thanks for your email.

The submitted energy strategy has been sent to our energy team for internal comments and I'm hoping to have these over the next week or so. I am happy to issue these to you as soon as they're in, and I'll include a summary in the formal report also.

I've had a response on flood risk, sustainable drainage and water efficiency which again will also be included in the report. These are fairly high level as nothing was submitted for detailed comments but is useful on what we'll expect:

Flood Risk (London Plan policy 5.12, draft policy SI.12)

1. The site is greater than 1 hectare in area. Under the NPPF, a Flood Risk Assessment (FRA) will need to accompany the application.
2. Environment Agency mapping shows parts of the site to be at high risk of flooding from surface water. Other forms of flooding may also present a risk. The FRA should assess all sources of flood risk in relation to London Plan Policy 5.12 (and draft London Plan policy SI.12).
3. Where the site is found to be at medium or high risk of flooding from at least one source the FRA should also consider the need for flood resilience and emergency planning measures.

Sustainable Drainage (London Plan policy 5.13, draft policy SI.13)

4. The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy 5.13 (and draft London Plan policy SI.13). This is particularly important given the surface water flood risk in the area. Where greenfield runoff rates are not feasible and robust justification is provided, a discharge rate of three times greenfield rate may be acceptable.
5. The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy set out in London Plan Policy 5.13 (and draft London Plan policy SI.13). Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, and permeable paving into the landscape, providing amenity and water quality benefits.

Water Efficiency (London Plan policy 5.15, draft policy SI.5)

6. The residential components of the development should achieve a water consumption of less than 105l/person/day, in line with London Plan policy 5.15 (and draft London Plan policy SI.5).
7. The non-residential components of the development should achieve the equivalent of an 'Excellent' rating on the water elements of BREEAM, in line with draft London Plan policy SI.5.
8. Water reuse should be considered for inclusion in the development to meet both water efficiency and sustainable drainage requirements.

Kind regards

■

From: ■ ■ (GVA) <■@gva.co.uk>
Sent: 15 October 2018 08:59
To: ■ <■@london.gov.uk>
Cc: ■ ■ (GVA) <■@gva.co.uk>
Subject: RE: Homebase Manor Road, Richmond - pre-app

Hi ■

It was great to meet you last week to discuss Manor Road. As promised, please find updated attendee list below:

– ICG Longbow
– ICG Longbow
– Avanton
– Avanton
– Assael Architects
– Assael Architects
– Assael Architects
– Gillespies Landscape
– Sanderson Associates Highways
– Hoare Lea Energy and Sustainability
– GVA Planning
– GVA Planning

With regard to energy, we didn't really touch on this in the meeting however we have issued you a summary energy and sustainability scoping pack. It would be really helpful if you could seek confirmation from your energy team on the acceptability of the following points:

- . The proposed energy strategy is as follows:
 1. Passive design measures (meeting Part L by passive means alone)
 2. Air Source Heat Pumps (block-by-block)
 3. PV
- . Targeting 35% reduction on Part L 2013 onsite (using Part L 2013 carbon factors)
- . Air Source Heat Pumps will be communal systems per block, rather than a site-wide network.
- . No existing or proposed local district heating networks identified.
- . Connection of each block to a future district heating system would be technically feasible, and future-proofing measures will be provided
- . Carbon emissions using SAP 10 carbon factors will also be presented (in addition to the standard submission based on Part L 2013 factors)
- . Confirmation sought as to whether carbon offset payment against the zero carbon target for residential should be based on Part L 2013 or SAP10 carbon factors.
- . Cooling hierarchy will be followed and overheating risk assessed using dynamic modelling as per CIBSE TM59 and TM49 weather files.

We look forward to receiving your formal pre-application comments in due course.

Many thanks

Associate

GVA

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gva.co.uk | www.gva.co.uk

65 Gresham Street, London EC2V 7NQ

From: (GVA)
Sent: 09 October 2018 16:49
To: (GVA)
Subject: RE: Homebase Manor Road, Richmond - pre-app

Hi

Attendees from our side tomorrow will be:

– ICG Longbow
– Avanton
– Assael Architects
– Assael Architects
– Assael Architects
– Gillespies Landscape
– Sanderson Associates Highways
– Hoare Lea Energy and Sustainability
– GVA Planning
– GVA Planning

Do you know who will be attending from the GLA on energy?

We look forward to meeting you tomorrow.

Kind regards

Associate

GVA

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[gva.co.uk](mailto:info@gva.co.uk) | www.gva.co.uk

65 Gresham Street, London EC2V 7NQ

From: [redacted] [[mailto:\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)]
Sent: 09 October 2018 16:09
To: [redacted] (GVA)
Cc: [redacted] (GVA)
Subject: RE: Homebase Manor Road, Richmond - pre-app

Please can you confirm the full list of attendees and their organisations for tomorrows pre-app meeting.

I understand [redacted] is also attending form Richmond.

Many thanks

From: [redacted]
Sent: 28 September 2018 08:46
To: [redacted] (GVA) <[\[redacted\]@gva.co.uk](mailto:[redacted]@gva.co.uk)>
Cc: [redacted] (GVA) <[\[redacted\]@gva.co.uk](mailto:[redacted]@gva.co.uk)>
Subject: RE: Homebase Manor Road, Richmond - pre-app

Morning [redacted]

[redacted] will be attending from TfL.

I look forward to receiving the information pack.

Kind regards

■

From: ■ (GVA) <■ [gva.co.uk](mailto:■@gva.co.uk)>
Sent: 26 September 2018 10:07
To: ■ <■ [london.gov.uk](mailto:■@london.gov.uk)>
Cc: ■ (GVA) <■ [gva.co.uk](mailto:■@gva.co.uk)>
Subject: Homebase Manor Road, Richmond - pre-app

Hi ■

I am writing with reference to the pre-app meeting for Homebase Manor Road, Richmond – which is scheduled for 10th October at 10am.

We will send a pack of information a week before the meeting – to cover energy, transport and design.

Could you confirm who the contact is at TfL please?

Please do not hesitate to contact me or ■ with any queries ahead of the meeting.

Kind regards,

■

■ ■

Principal Planner

GVA

T 020 ■ M ■
■ [gva.co.uk](mailto:■@gva.co.uk) | www.gva.co.uk

65 Gresham Street, London EC2V 7NQ

Homebase Site, Manor Road

in the London Borough of Richmond-upon-Thames

meeting date: 10 October 2018

meeting time: 10:00 – 12:00

location: City Hall, Fourth Floor, Meeting Room 4.1E

The proposal

Redevelopment of the site to provide a residential led scheme comprising 381 units, commercial floorspace and new public realm.

The applicant

The applicant is **Avanton** and the agent is **GVA**.

Background

On 24 July 2018, the GLA received a request for a pre-application meeting to discuss the above proposal at the above site within the London Borough of Richmond-upon-Thames. Based on the material provided in advance of the meeting, the following strategic issues have been identified for discussion.

1. Introductions

2. Presentation of scheme by applicant

3. Principle of development

- Existing land uses
- Proposed uses

4. Housing and affordable housing

- Approach to affordable housing
- Viability, eligibility criteria, early and late stage reviews and grant funding
- Housing mix
- Housing quality
- Childrens' play space

5. Urban design

- Height, scale and massing
- Relationship to surrounding context & emerging context
- Routes, landscape and public realm

6. Heritage

7. Inclusive design

8. Transport

- General approach to transport
- Servicing arrangements
- Blue Badge parking
- Cycle parking
- Travel, construction and logistics and servicing plans

9. Climate change

10. Flood risk, drainage and water

11. Position of the LPA

12. Next steps

- Timing of submission
- Further meetings

13. AOB

Attending

GLA Group

[Redacted]
[Redacted]
[Redacted] [Redacted]
[Redacted] [Redacted]

Team Leader
Senior Strategic Planner - Case Officer
Senior Strategic Planner - Urban Design
Principal Technical Planner, TfL

Applicant

[Redacted] [Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted] [Redacted]
[Redacted]
[Redacted] [Redacted]
[Redacted]
[Redacted]

ICG Longbow
Avanton
Assael Architects
Assael Architects
Assael Architects
Gillespies Landscape
Sanderson Associates Highways
Hoare Lea Energy and Sustainability
GVA Planning
GVA Planning

LPA

[Redacted] [Redacted]

London Borough of Richmond-upon-Thames (Case Officer)

for further information, contact GLA Planning Unit (Development Management Team):

[Redacted] **Senior Strategic Planner**
020 7084 [Redacted] [Redacted] [london.gov.uk](https://www.london.gov.uk)

[REDACTED]

From: [REDACTED] (GVA) <[REDACTED]@gva.co.uk>
Sent: 04 October 2018 11:13
To: [REDACTED]
Cc: [REDACTED] (GVA); [REDACTED]
Subject: RE: Homebase Manor Road, Richmond - pre-app
Attachments: A3004 Design Presentation Document_Part2.pdf

Design Presentation Document Part 2 attached.

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] [gva.co.uk](mailto:[REDACTED]@gva.co.uk) | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 04 October 2018 11:14
To: [REDACTED]
Cc: [REDACTED] (GVA); [REDACTED]
Subject: RE: Homebase Manor Road, Richmond - pre-app
Design Presentation Document Part 1 attached.

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] [gva.co.uk](mailto:[REDACTED]@gva.co.uk) | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 04 October 2018 11:14
To: [REDACTED]
Cc: [REDACTED] (GVA); [REDACTED]
Subject: RE: Homebase Manor Road, Richmond - pre-app
Hi [REDACTED]

I received a bounce back on my email below – due to the size of the documents. I have attached the Cover Letter, Energy and Sustainability Strategy and Transport Assessment Scoping Study to this email. I will follow with two additional emails for the Design Presentation Document Part 1 and 2.
Kind regards,

[REDACTED]
Principal Planner
GVA

T 020 [REDACTED] M [REDACTED]
[REDACTED] [gva.co.uk](mailto:[REDACTED]@gva.co.uk) | www.gva.co.uk
65 Gresham Street, London EC2V 7NQ

From: [REDACTED] (GVA)
Sent: 04 October 2018 11:07
To: [REDACTED]
Cc: [REDACTED] (GVA); [REDACTED]
Subject: Homebase Manor Road, Richmond - pre-app
Hi [REDACTED]

Please find attached a cover letter and the following documents in advance of our meeting on 10th October:

- Design Presentation Document (split in two parts);
- Transport Assessment Scoping Study; and
- Energy and Sustainability Strategy.

I would be grateful if you could confirm receipt of the documents (I am conscious that the file sizes are quite big).

Kind regards,

[Redacted Signature]

Principal Planner

GVA

T 020 [Redacted] M [Redacted]
[Redacted] gva.co.uk | www.gva.co.uk

65 Gresham Street, London EC2V 7NQ

[Transport scoping - <https://images.richmond.gov.uk/iam/IAMCache/2953411/2953411.pdf>]



65 Gresham Street
London
EC2V 7NQ

3 October 2018

██████████
Strategic Planning
City Hall
The Queen's Walk
London
SE1 2AA

[VIA EMAIL]

████████████████████
████████████████████
gva.co.uk

Dear ██████████

**MANOR ROAD RICHMOND
PRE-APPLICATION MEETING**

On behalf of our client, Avanton, we write in advance of the pre-application meeting scheduled for 10 October 2018.

This letter sets out the background to the scheme and a summary of the emerging design proposals.

We also enclose the following documents for discussion:

- Design Presentation document, prepared by Assael;
- Transport Assessment Scoping Study, prepared by Sanderson Associates; and
- Energy and Sustainability Strategy, prepared by Hoare Lea.

Background

The 1.5ha site comprises the existing out of centre retail uses (Homebase and Pets At Home stores), and surface level car parking in North Sheen. The site has no planning policy designations under the Local Plan Proposals Map (July 2015).

The client also has an interest in land directly to the north of the application site, which comprises a TfL bus depot. This site does not form part of the scheme proposals at this time.

To the east of the site is a large Sainsbury's foodstore. The site is bound to the south and west by railway lines. North Sheen Station is located directly to the south of the site.

The site is high public transport accessibility, with PTAL between 4-6a.

The site is not located within a conservation area, and contains no statutorily listed buildings. There are locally identified buildings of townscape merit located along Manor Grover, St George's Road and Townsend Terrace.

GVA is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS.

**Birmingham Bristol Cardiff Dublin
Edinburgh Glasgow Leeds Liverpool
London Manchester Newcastle**

Development Proposals

The site provides an exciting development opportunity as a result of the existing retail uses vacating the site. The proposals involve the demolition of the existing retail warehouses, and the residential-led redevelopment of the site. Details of the proposal are set out in the Design Presentation document prepared by Assael.

In summary the proposals include:

- Creating a new frontage along Manor Road comprising a small commercial frontage and residential units;
- Creation of a new public square within the heart of the scheme, and a retail kiosk;
- A series of residential courtyards with clear visual links through to the central square;
- Four residential blocks rising from 4 storeys along Manor Road, up to 7 storeys along the western railway frontage.

In total the scheme proposes 381 residential units, across a range of 1, 2 and 3 bedroom units (including three townhouses). Of these units, 35% are proposed to be affordable, subject to viability.

The scheme density is 254 units per hectare which is within the density matrix target of 175-355 units per hectare for PTAL 4 to 6 sites within a Central Setting.

The design team have met with officers from the London Borough of Richmond in a series of four pre-application meetings, throughout which the scheme design has evolved (see Assael design document for further information).

We look forward to meeting with you next week to discuss in further detail.

Yours sincerely



██████████
Associate

020 ██████ ██████

██████████ gva.co.uk

For and on behalf of GVA Grimley Limited

Manor Road, Richmond. Energy & Sustainability Strategy Summary.

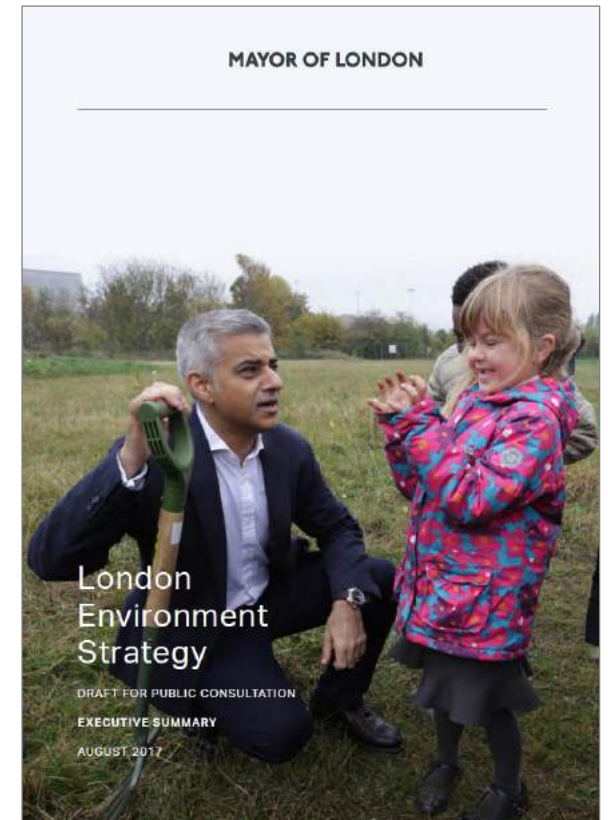
A CONVERSATION WITH THE
PLANNERS



Current planning/regulatory context.

Environmental Strategy.

- Cleaner, local renewable energy
- Mayor to trial low carbon technologies i.e. heat pumps and batteries
- Target best air quality in a major city by 2050
- Considering *Air Quality Positive* standard
- Solar Action Plan



Current planning/regulatory context.

Draft New London Plan (2019).

Policy SI1: Improving air quality

Development proposals *should not*:

- lead to further deterioration of existing poor air quality.
- create new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits

(...) development briefs for large-scale development proposals subject to an EIA should propose methods of achieving an Air Quality Positive approach through the new development. Major development proposals must be at least air quality neutral and be submitted with an Air Quality Assessment.

Policy SI3: Energy Infrastructure

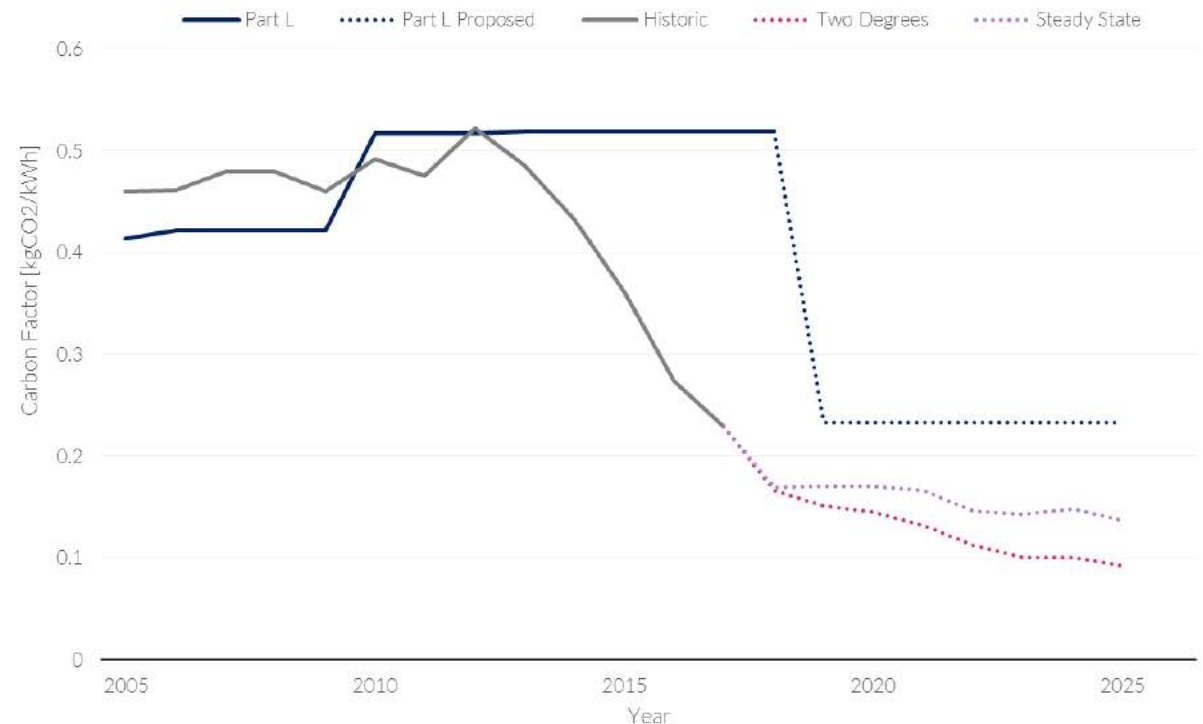
“...it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available.”



Current planning/regulatory context.

Grid Decarbonisation.

- Current Part L carbon content of grid electricity:
0.519 kgCO₂/kWh
- Future Part L (SAP 10 – released but not yet enforced) carbon content of grid electricity:
Expected **0.233 kgCO₂/kWh**
(55% less than current Part L)
- Actual carbon content of grid electricity
(end of 2018 projected): **0.180 kgCO₂/kWh**
(65% less than current Part L)
- Future carbon content of grid electricity
(2038 projected): **0.050 kgCO₂/kWh**
(90% less than current Part L)



Energy Strategy.

Air Source Heat Pump.



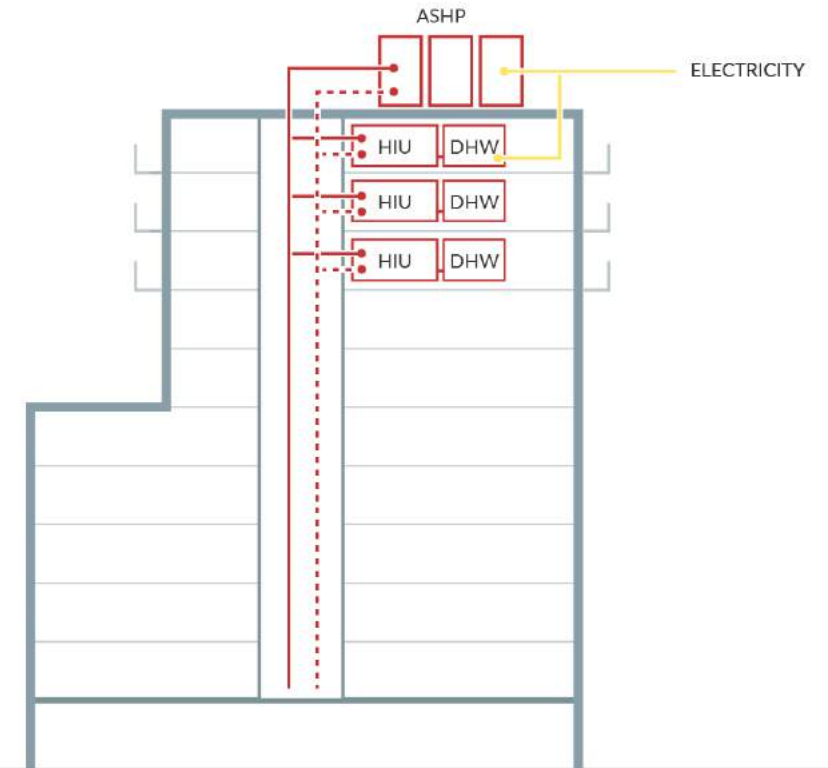
PROS

- Initial carbon savings
- Increase in carbon savings with grid decarbonisation
- No impact on local air quality
- Lower risk of corridor overheating
- Reduced size of basement plant

CONS

- Impact on electrical infrastructure (additional DNO substations / infrastructure reinforcement costs)
- More roof plant space required
- Larger utility cupboards
- Increased maintenance requirements
- Lower design life (typically 10/15 years)
- Auto de-frost function takes units off-line for periods

BUILDING BY
BUILDING ASHP







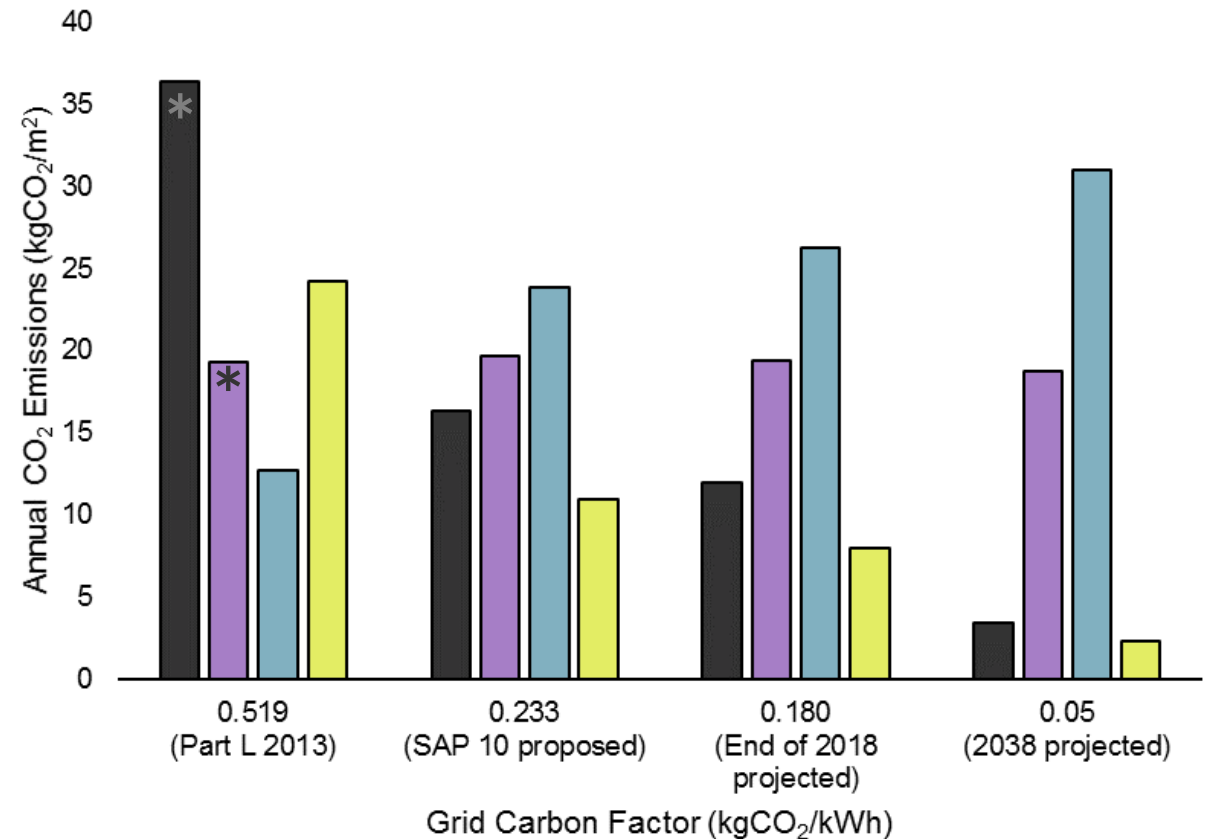
INDICATIVE SKETCH SHOWING SERVICING STRATEGY FOR THIS TYPE OF SYSTEM.

Carbon emission reductions.

Indicative dwelling performance.

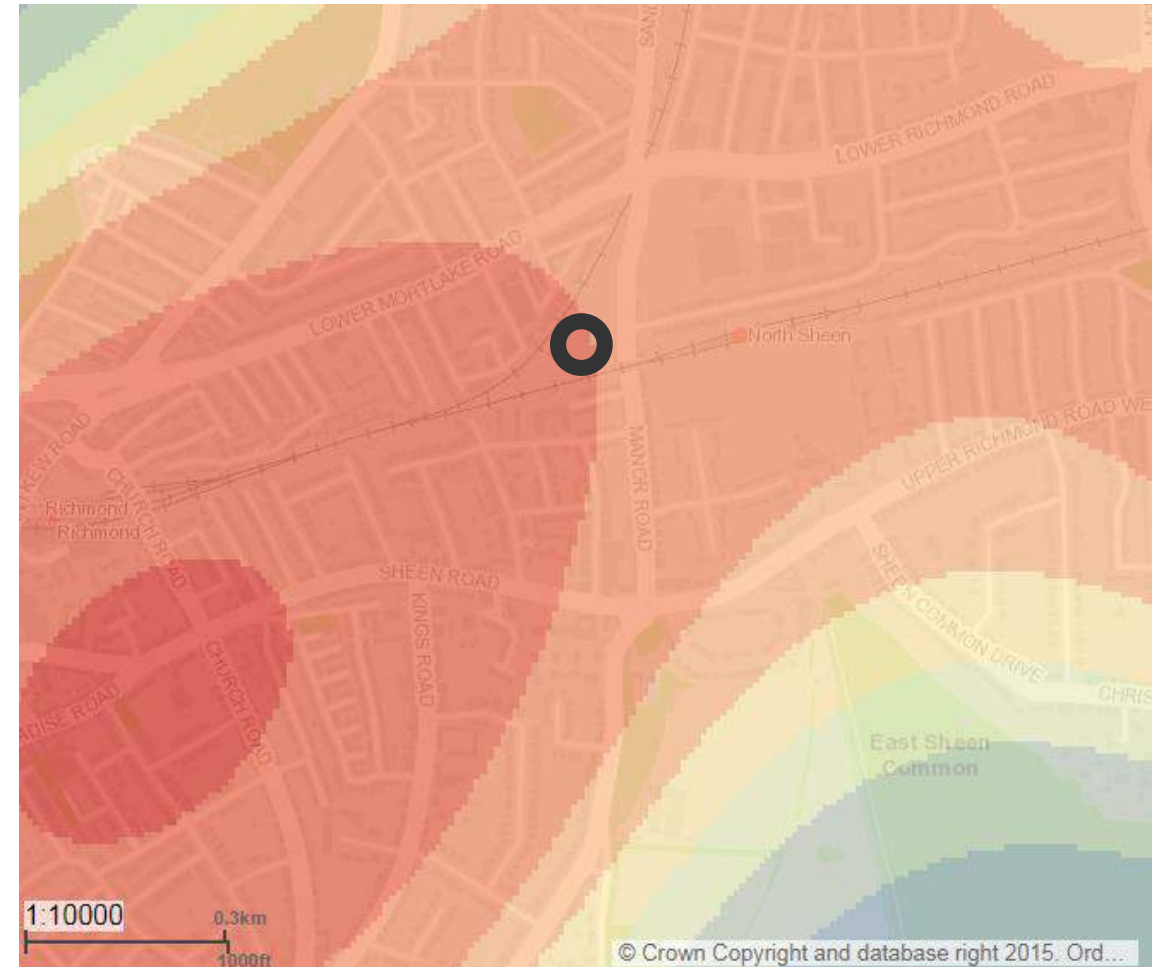
Legend

-  Target Emission Rate (TER)
-  Gas Boiler Emissions
-  CHP Emissions
-  Air Source Heat Pump Emissions
- * TER for all-electric systems is currently higher than for gas boiler systems (as per current Part L 2013 methodology).
- Likely to change under proposed SAP methodology.



District Energy connections.



- No existing district energy networks in vicinity of the site
- Connections to potential future networks and/or near-by waste heat sources can be facilitated by heat interface units in the basement on a building-by-building basis, should a low-carbon network become available in the vicinity of the site in future.

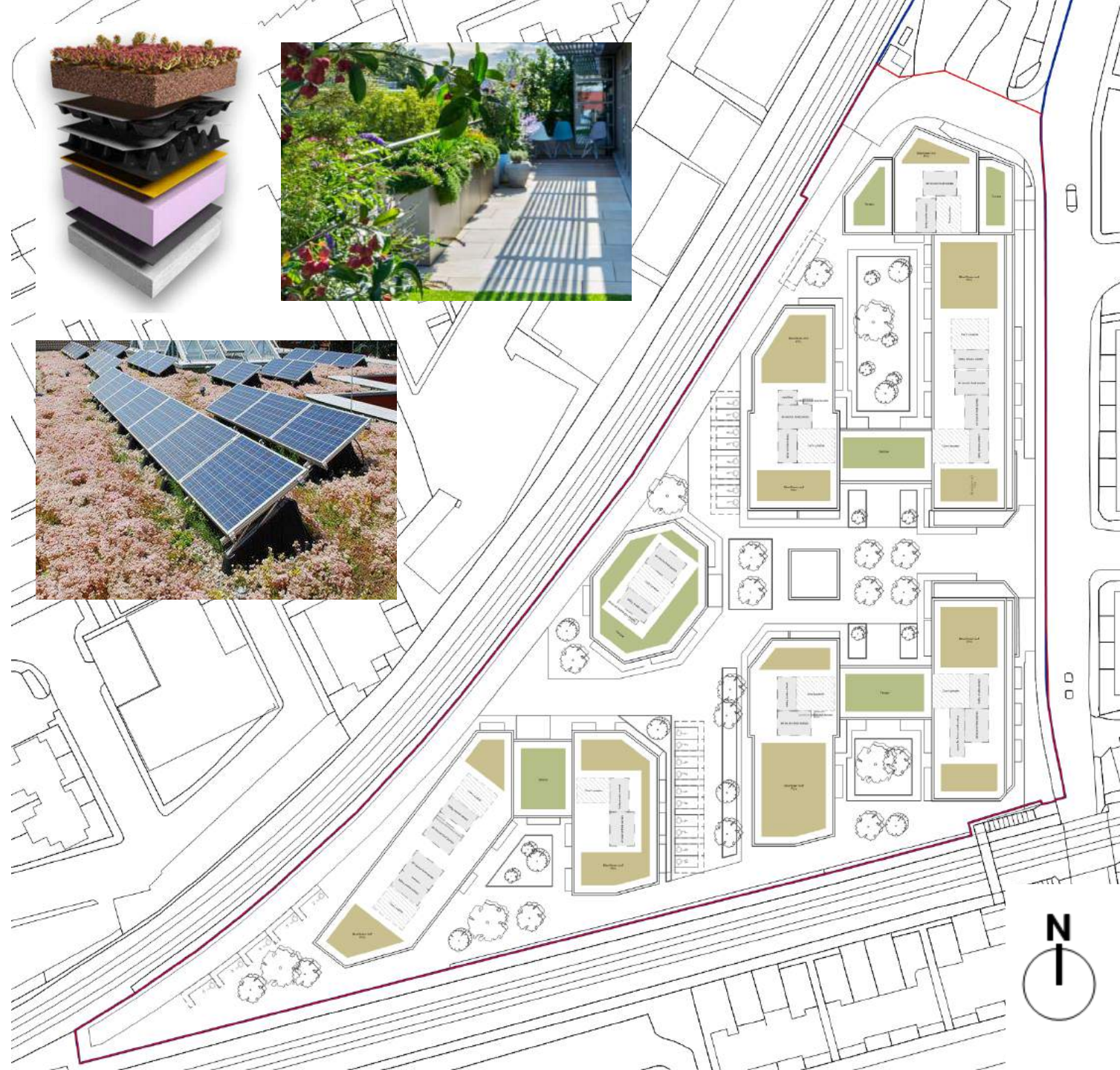


EXCERPT FROM LONDON HEAT MAP

Roof area appraisal.

Legend

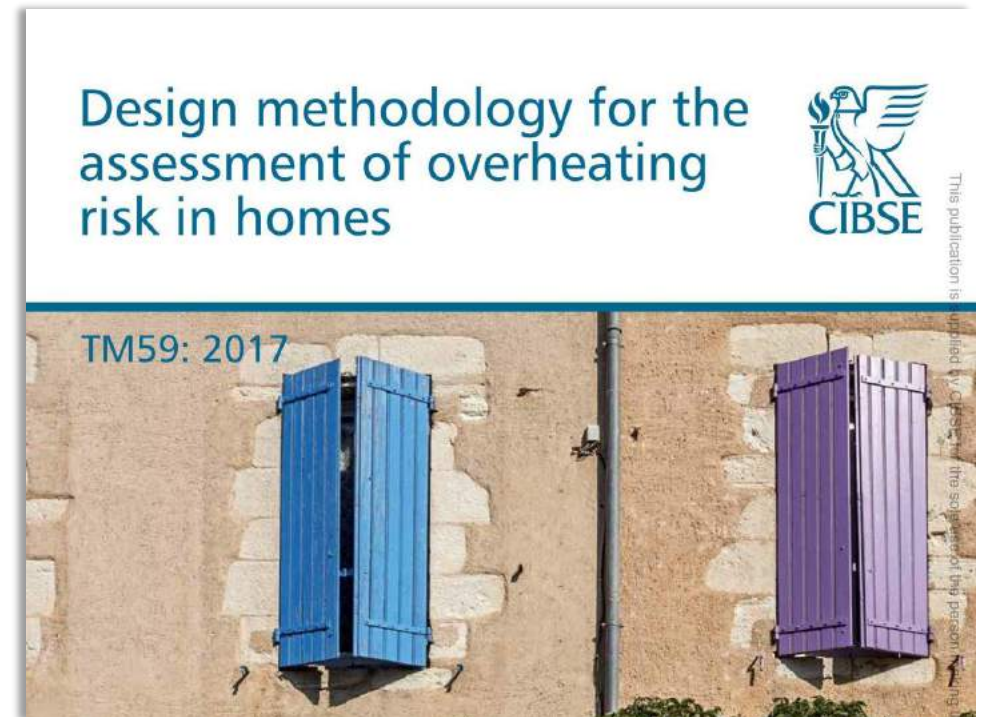
-  - Green roof (sedum type), in combination with PV panels atop and/or blue roof underneath - updated layout will be included in application submission.
 - The team will assess whether blue roof can also be included underneath mechanical plant space.
 - Roof build-up thicknesses will be assessed against parameter plan heights.
-
-  Residential amenity terrace.



CIBSE TM59.

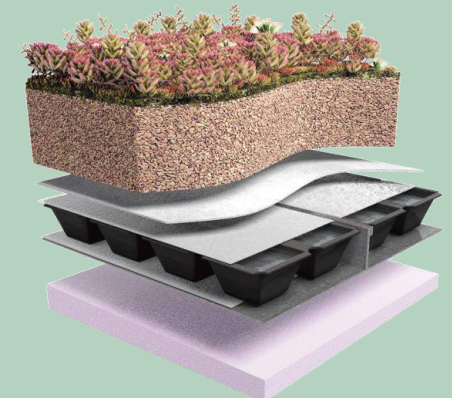
Assessment of overheating risk in homes.

- A TM59 assessment using dynamic modelling will be undertaken to assess the risk of overheating for a sample of residential spaces
- Both adaptive and fixed method assessments will be undertaken, and results presented alongside the acoustic assessment for the development
- Passive measures of minimising high internal temperatures will be prioritised
- Use of the London Plan Cooling Hierarchy
- Future climate consideration



Wider sustainability targets.

- BREEAM 2018 'Excellent' targeted for shell & core retail – subject to technical viability, and tenant cooperation (Ene01)
- Reduction in run-off rates targeted by use of SuDS measures: Green and blue roofs, permeable paving, and attenuation tanks, subject to design
- Ecology and biodiversity being incorporated in design within green (sedum) roofs and ground level planting
- Parking spaces provided at a rate of 5% of dwellings, for disabled users only
- Cycle storage for residents and retail staff/customers
- Residential potable water consumption <105 litres/p/d
- Waste recycling will be enabled
- Considerate Construction 'best practice' target
- Planting will be designed to limit the consumption of potable water through measures such as selection of appropriate species, subsurface drip irrigation, and moisture retentive soil

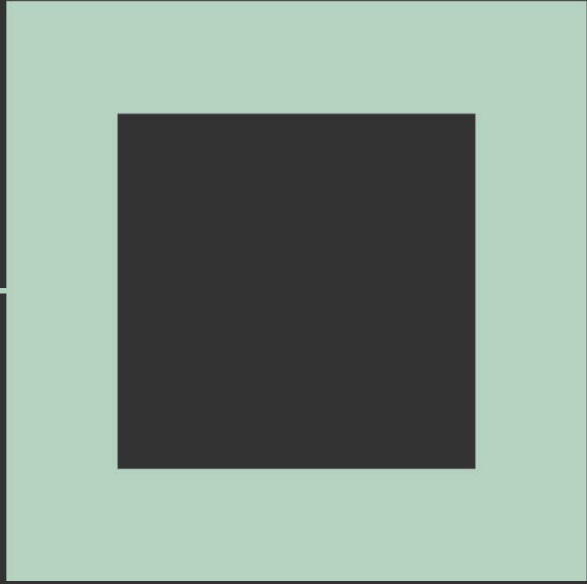


Energy Strategy. Summary.

- Gas-fired CHP has been a standard solution of recent years, but in light of grid decarbonisation, a diminished carbon benefit is anticipated.
- Evolving planning policy landscape is acknowledging air quality issues in London.
- An Air Source Heat Pump (ASHP) solution provides significantly decreasing carbon emissions in the future, and no on-site air quality implications.
- ASHP solutions require additional rooftop plant space, but present an improved holistic sustainable design solution.
- Photovoltaic panels (PVs) are proposed atop unshaded green roof areas, potentially also in combination with a blue roof provision, pending build-up height confirmation.

Sustainability Strategy. Summary.

- BREEAM 2018 'Excellent' targeted for shell & core retail spaces
- Reduction in run-off rates targeted by use of SuDS
- Ecology and biodiversity being incorporated
- Parking spaces provided at a rate of 5% of dwellings, for disabled users only
- Cycle storage spaces provided for residents and retail staff/customers
- Residential potable water consumption <105 litres/person/day
- A TM59 assessment will be undertaken to assess the risk of overheating for residential spaces.



Thank you.
hoarelea.com