

**Former Stag Brewery, Mortlake**  
**in the London Borough of Richmond-upon-Thames**  
**planning application nos. (A) 18/0547/FUL and (B) 18/0548/FUL**

**Planning application**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 ("the Order") and Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

**The proposal**

Two linked planning applications, comprising:

Application A (18/0547/FUL):

A hybrid application including:

1. The demolition of existing buildings and structures (except 'The Maltings' and the facade of the Bottling Plant and former Hotel). Site clearance and groundworks to allow for the comprehensive phased redevelopment of the site.
2. Detailed application for works to the east side of Ship Lane, which comprise:
  - a. Demolition of existing buildings (except The Maltings and the facade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks.
  - b. Alterations and extensions to existing buildings and erection of buildings varying in height from 3 to 10 storeys plus a basement of one and two storeys below ground.
  - c. Residential apartments.
  - d. Flexible use floorspace for:
    - i. Retail, financial and professional services, cafe/restaurant and drinking establishment uses
    - ii. Offices
    - iii. Non-residential institutions and community use
    - iv. Boathouse
  - e. Hotel / public house with accommodation
  - f. Cinema
  - g. Offices
  - h. New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works
  - i. Provision of on-site cycle, vehicle and service parking at surface and basement level
  - j. Provision of public open space, amenity and play space and landscaping
  - k. Flood defence and towpath works
  - l. Installation of plant and energy centres
3. Outline application, with all matters reserved, for works to the west of Ship Lane which comprise:

- a. The erection of a single storey basement and buildings varying in height from 3 to 8 storeys
- b. Residential development
- c. Provision of on-site cycle, vehicle and service parking
- d. Provision of public open space, amenity and play space and landscaping
- e. New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works

Application B (18/0548/FUL):

Detailed planning permission for the erection of a three storey building to provide a new secondary school with sixth form; sports pitch with floodlighting, external MUGA and play space; and associated external works including landscaping, car and cycle parking, new access routes and associated works.

**The applicant**

The applicant is **Reselton Properties Limited**, and the architect is **Squire & Partners**.

## **Recommendation summary**

The Mayor, acting as Local Planning Authority for the purpose of determining these applications;

- i. grants conditional planning permission in respect of applications 18/0547/FUL and 18/0548/FUL for the reasons set out in the reasons for approval section below, and subject to the prior completion of a section 106 legal agreement;
- ii. delegates authority to the Head of Development Management to:
  - a. attach, add, delete or vary, the final detailed wording of the conditions and informatives, with any material changes being referred back to the Mayor;
  - b. negotiate, agree the final wording, sign, execute and complete the section 106 legal agreement, with any material changes being referred back to the Mayor; and
  - c. issue the planning permission.
- iii. delegates authority to the Head of Development Management to agree any variations to the proposed heads of terms for the section 106 legal agreement, with any material changes being referred back to the Mayor;
- iv. delegates authority to the Head of Development Management to refer it back to the Mayor if, by 27 January 2022, the section 106 legal agreement has not been completed;
- v. notes that the approval of Reserved Matters pursuant to the outline component of the planning permission would be submitted to, and determined by the Mayor; unless following submission of Reserved Matters the Mayor directs the Council to determine the Reserved Matters application;
- vi. notes that approval of details pursuant to conditions imposed on the planning permission will be submitted to, and determined by Richmond Council;
- vii. notes that Richmond Council will be responsible for the enforcement of the conditions attached to the planning permission.

Subject to the lifting of the holding direction from the Secretary of State.

## Drawing numbers and documents

Table 1 - drawings and associated documentation submitted by the Applicant in support of the Applications

<b>Proposed drawings</b>
<b>Application A:</b>
Demolition Plan – Entire Site JAZ12_Z0_P_00_002
Demolition Plan – Development Area 1 JAZ12_Z1_P_00_001
Demolition Plan – Development Area 2 JAZ12_Z2_P_00_001
Red Line Site Location Plan – Applications A, B and C JAZ12_Z0_P_00_003
Red Line Site Location and Applicant Ownership Plan JAZ12_Z0_P_00_004
Application A – Red Line Site Location Plan JAZ12_Z0_P_00_005
Development Area 1 and Development Area 2 Boundaries JAZ12_Z0_P_00_008
Site Application Boundaries: Applications A, B and C C645_Z0_P_00_001
Application A Block Plan C645_Z0_P_00_002
Proposed Masterplan Ground Floor Level C645_MP_P_00_001
Proposed Masterplan Typical Floor Level C645_MP_P_TY_001
Proposed Development Area 1 Ground Floor Level Plan C645_Z1_P_00_001
Proposed Development Area 1 Typical Floor Level Plan C645_Z1_P_TY_001
Proposed Development Area 2 Typical Floor Level Plan C645_Z2_P_00_002
Proposed Development Area 2 Ground Floor Level Plan C645_Z2_P_00_001
Proposed Development Area 2 Typical Floor Level Plan C645_Z2_P_TY_002
Proposed Development Area 2 – Typical Level Plan C645_Z2_P_TY_001
Proposed Development Area 1 Basement Plan
Proposed Development Area 2 Basement Plan
Proposed Development Area 01 Basement Section AA
Proposed Development Area 01 Basement Section BB
Proposed Development Area 02 Basement Section CC
Proposed Development Area 02 Basement Section DD
Building 1 - Proposed Ground Floor Plan
Building 1 - Proposed First Floor Plan
Building 1 - Proposed Second Floor Plan
Building 1 - Proposed Third Floor Plan
Building 1 - Proposed Basement Plan 1
Building 1 - Proposed Basement Plan 2
Building 1 - Proposed Roof Plan
Building 2 - Proposed Ground Floor Plan
Building 2 - Proposed Typical Floor 1 (Second to Fifth Levels)
Building 2 - Proposed Typical Floor 2 (First and Sixth Levels)
Building 2 - Proposed Seventh Floor Plan

Building 2 - Proposed Eighth Floor Plan  
Building 2 - Proposed Ninth Floor Plan  
Building 2 - Proposed Roof Plan  
Building 3 - Proposed Ground Floor Plan  
Building 3 - Proposed Typical Floor 1 (First to Fourth Levels)  
Building 3 - Proposed Fifth Floor Plan  
Building 3 - Proposed Sixth Floor Plan  
Building 3 - Proposed Roof Plan  
Building 4 - Proposed Ground Floor Plan  
Building 4 - Proposed First Floor Plan  
Building 4 - Proposed Second Floor Plan  
Building 4 - Proposed Third Floor Plan  
Building 4 - Proposed Fourth Floor Plan  
Building 4 - Proposed Fifth Floor Plan  
Building 4 - Proposed Sixth Floor Plan  
Building 4 - Proposed Seventh Floor Plan  
Building 4 - Proposed Roof Plan  
Building 5 - Proposed Lower Ground Floor Plan  
Building 5 - Proposed Ground Floor Plan  
Building 5 - Proposed First Floor Plan  
Building 5 - Proposed Second Floor Plan  
Building 5 - Proposed Third Floor Plan  
Building 5 - Proposed Roof Plan  
Building 6 - Proposed Ground Floor Plan  
Building 6 - Proposed Typical Floor Plan  
Building 6 - Proposed First Floor Plan  
Building 6 - Proposed Second Floor Plan  
Building 6 - Proposed Third Floor Plan  
Building 6 - Proposed Fourth Floor Plan  
Building 6 - Proposed Roof Plan  
Building 7 - Proposed Ground Floor Plan  
Building 7 - Proposed Typical Floor 1 (Second to Fifth Levels)  
Building 7 - Proposed Typical Floor Plan 2 (First and Sixth Levels)  
Building 7 - Proposed Fifth Floor Plan  
Building 7 - Proposed Sixth Floor Plan  
Building 7 - Proposed Seventh Floor Plan  
Building 7 - Proposed Eighth Floor Plan  
Building 7 - Proposed Ninth Floor Plan  
Building 7 - Proposed Roof Plan  
Building 8 - Proposed Ground Floor Plan

Building 8 - Proposed Typical Floor Plan (Second to Fifth Levels)  
Building 8 - Proposed Typical Floor Plan 2 (First and Sixth Levels)  
Building 8 - Proposed Fifth Floor Plan  
Building 8 - Proposed Sixth Floor Plan  
Building 8 - Proposed Seventh Floor Plan  
Building 8 - Proposed Eighth Floor Plan  
Building 8 - Proposed Roof Plan  
Building 9 - Proposed Ground Floor Plan  
Building 9 - Proposed Typical Floor Plan  
Building 9 - Proposed Fourth Floor Plan  
Building 9 - Proposed Roof Plan  
Building 10 - Proposed Ground Floor Plan  
Building 10 - Proposed Typical Floor Plan  
Building 10 - Proposed Fourth Floor Plan  
Building 10 - Proposed Fifth Floor Plan  
Building 10 - Proposed Roof Plan  
Building 11 - Proposed Ground Floor Plan  
Building 11 - Proposed Typical Floor 1 (Second to Fifth Levels)  
Building 11 - Proposed Typical Floor 2 (First and Sixth Levels)  
Building 11 - Proposed Fifth Floor Plan  
Building 11 - Proposed Sixth Floor Plan  
Building 11 - Proposed Seventh Floor Plan  
Building 11 - Proposed Eighth Floor Plan  
Building 11 - Proposed Roof Plan  
Building 12 - Proposed Ground Floor Plan  
Building 12 - Proposed Typical Floor Plan (First to Fourth Levels)  
Building 12 - Proposed Fifth Floor Plan  
Building 12 - Proposed Sixth Floor Plan  
Building 12 - Proposed Seventh Floor Plan  
Building 12 - Proposed Roof Floor Plan  
Building 2 - Accessible Unit Apartment 2.G.2  
Building 2 - Accessible Unit Apartment 2.G.3  
Building 2 - Accessible Unit Apartment 2.G.4  
Building 2 - Accessible Unit Apartment 2.G.6  
Building 2 - Accessible Unit Apartment 2.G.7  
Building 2 - Accessible Unit Apartment 2.5.3  
Building 2 - Accessible Unit Apartment 2.5.11  
Building 2 - Accessible Unit Apartment 2.5.15  
Building 2 - Accessible Unit Apartment 2.6.6  
Building 2 - Accessible Unit Apartment 2.TY1.3

Building 2 - Accessible Unit Apartment 2.TY1.17  
Building 3 - Accessible Unit Apartment 3.G.1  
Building 3 - Accessible Unit Apartment 3.G.3  
Building 3 - Accessible Unit Apartment 3.5.4  
Building 3 - Accessible Unit Apartment 3.TY.4  
Building 4 - Accessible Unit Apartment 4.1.2  
Building 4 - Accessible Unit Apartment 4.1.3  
Building 4 - Accessible Unit Apartment 4.2.2  
Building 4 - Accessible Unit Apartment 4.2.3  
Building 4 - Accessible Unit Apartment 4.5.2  
Building 4 - Accessible Unit Apartment 4.5.3  
Building 6 - Accessible Unit Apartment 6.TY.5  
Building 7 - Accessible Unit Apartment 7.G.1  
Building 7 - Accessible Unit Apartment 7.G.2  
Building 7 - Accessible Unit Apartment 7.G.4  
Building 8 - Accessible Unit Apartment 8.G.3  
Building 8 - Accessible Unit Apartment 8.G.5  
Building 8 - Accessible Unit Apartment 8.5.8  
Building 8 - Accessible Unit Apartment 8.TY1.4  
Building 8 - Accessible Unit Apartment 8.TY1.5  
Building 9 - Accessible Unit Apartment 9.TY.1  
Building 10 - Accessible Unit Apartment 10.TY.7  
Building 11 - Accessible Unit Apartment 11.G.1  
Building 11 - Accessible Unit Apartment 11.G.2  
Building 11 - Accessible Unit Apartment 11.5.1  
Building 12 - Accessible Unit Apartment 12.G.1  
Building 12 - Accessible Unit Apartment 12.G.2  
Building 12 - Accessible Unit Apartment 12.6.2  
Building 3 - Ground Floor Level Refuse Store Plan  
Building 4 - Ground Floor Level Refuse Store Plan  
Building 6 - Ground Floor Level Refuse Store Plan  
Building 8 - Ground Floor Level Refuse Store Plan  
Building 9 - Ground Floor Level Refuse Store Plan  
Building 10 - Ground Floor Level Refuse Store Plan  
Building 12 - Ground Floor Level Refuse Store Plan  
Building 1 - Proposed East Elevation  
Building 1 - Proposed North Elevation  
Building 1 - Proposed South Elevation  
Building 1 - Proposed West Elevation  
Building 2 - Proposed East Elevation

Building 2 - Proposed North Elevation 1  
Building 2 - Proposed North Elevation 2  
Building 2 - Proposed South Elevation  
Building 2 - Proposed West Elevation 1  
Building 2 - Proposed West Elevation 2  
Building 3 - Proposed East Elevation  
Building 3 - Proposed North Elevation  
Building 3 - Proposed South Elevation  
Building 3 - Proposed West Elevation  
Building 4 - Proposed East Elevation  
Building 4 - Proposed North Elevation  
Building 4 - Proposed South Elevation  
Building 4 - Proposed West Elevation  
Building 5 - Proposed Hotel Elevations  
Building 5 - Proposed South Elevation  
Building 5 - Proposed East & North Elevations  
Building 5 - Proposed North & West Elevations  
Building 6 - Proposed East Elevation  
Building 6 - Proposed North Elevation  
Building 6 - Proposed South Elevation 1  
Building 6 - Proposed South Elevation 2  
Building 6 - Proposed West Elevation  
Building 7 - Proposed East Elevation  
Building 7 - Proposed North Elevation  
Building 7 - Proposed South Elevation  
Building 7 - Proposed West Elevation  
Building 8 - Proposed East Elevation  
Building 8 - Proposed North Elevation  
Building 8 - Proposed South Elevation  
Building 8 - Proposed West Elevation 1  
Building 8 - Proposed West Elevation 2  
Building 9 - Proposed East Elevation  
Building 9 - Proposed North Elevation  
Building 9 - Proposed South Elevation  
Building 9 - Proposed West Elevation  
Building 4 - Proposed East Elevation  
Building 4 - Proposed North Elevation  
Building 4 - Proposed South Elevation  
Building 4 - Proposed West Elevation  
Building 5 - Proposed Hotel Elevations



Building 5 - Proposed South Elevation  
Building 5 - Proposed East & North Elevations  
Building 5 - Proposed North & West Elevations  
Building 6 - Proposed East Elevation  
Building 6 - Proposed North Elevation  
Building 6 - Proposed South Elevation 1  
Building 6 - Proposed South Elevation 2  
Building 6 - Proposed West Elevation  
Building 7 - Proposed East Elevation  
Building 7 - Proposed North Elevation  
Building 7 - Proposed South Elevation  
Building 7 - Proposed West Elevation  
Building 8 - Proposed East Elevation  
Building 8 - Proposed North Elevation  
Building 8 - Proposed South Elevation  
Building 8 - Proposed West Elevation 1  
Building 8 - Proposed West Elevation 2  
Building 9 - Proposed East Elevation  
Building 9 - Proposed North Elevation  
Building 9 - Proposed South Elevation  
Building 9 - Proposed West Elevation  
Mansion Typology Bay Study Elevation - Double Gable  
Mansion Typology Bay Study Elevation - Single Bay  
Mansion Typology Bay Study Elevation - Single Gable  
Mansion Typology Bay Study Elevation - Retail Frontage  
Bottling and Hotel Building Bay Study Elevation - Existing Façade Office  
Bottling and Hotel Building Bay Study Elevation - New Façade Office  
Bottling and Hotel Building Bay Study Elevation - Existing Façade Hotel  
Cinema Bay Study Elevation  
Warehouse Typology Bay Study Elevation  
Proposed Site Elevation AA  
Proposed Site Elevation BB  
Proposed Site Elevation CC  
Proposed Site Elevation DD  
Proposed Site Elevation EE  
Proposed Site Elevation FF  
Proposed Site Elevation GG  
Proposed Site Elevation HH  
Proposed Site Elevation II  
Proposed Site Elevation JJ

Proposed Site Elevation KK  
Proposed Site Elevation LL  
Proposed Site Elevation MM  
Proposed Site Elevation NN  
Proposed Site Elevation OO  
Proposed Site Elevation PP  
Proposed Site Elevation QQ  
Proposed Site Elevation RR  
Proposed Site Section AA  
Proposed Site Section BB  
Proposed Site Section CC  
Proposed Site Section DD  
Proposed Site Section EE  
Proposed Site Section FF  
Block Footprint and Horizontal Lines of Deviation One to Three Storeys  
Block Footprint and Horizontal Lines of Deviation Four Storeys  
Block Footprint and Horizontal Lines of Deviation Five Storeys  
Block Footprint and Horizontal Lines of Deviation Six Storeys  
Block Footprint and Horizontal Lines of Deviation Seven Storeys  
Block Heights and Vertical Lines of Deviation  
Proposed Building Levels - Ground Floor  
Land Use Distribution Ground and Upper Floors  
Land Use Distribution Basement  
Basement Maximum Depth and Extent  
Demolition and Retention Plan  
Proposed Active Frontages - Ground Floor  
Block Footprint and Horizontal Lines of Deviation Eight Storeys  
Location of Elevations with Elevational Restrictions  
Proposed Site Section DD\_ Heights and Levels  
Proposed Site Section FF\_ Heights and Levels  
Proposed Site Section LL\_ Heights and Levels  
Proposed Site Section JJ\_ Heights and Levels  
Proposed Site Section KK Heights and Levels  
Proposed Site Section OO\_Heights and Levels  
Proposed Site Section QQ\_Heights and Levels  
Conditions Plot Plan  
Conditions Plot Plan (Basement Works Only)  
Proposed Masterplan Ground Floor Level - Obscured Glazing  
Proposed Masterplan First Floor Level - Obscured Glazing  
Proposed Masterplan Second Floor Level - Obscured Glazing

Proposed Masterplan Third Floor Level - Obscured Glazing  
Proposed Masterplan Fourth Floor Level - Obscured Glazing  
Proposed Masterplan Fifth Floor Level - Obscured Glazing  
Proposed Masterplan Sixth Floor Level - Obscured Glazing  
Proposed Masterplan Seventh Floor Level - Obscured Glazing  
Proposed Masterplan Eighth Floor Level - Obscured Glazing  
Proposed Masterplan Ninth Floor Level - Obscured Glazing  
Alternative Phase 1 masterplan  
Proposed Site Wide Landscape Rendered Masterplan  
Proposed Site Wide Landscape GA Plan  
Development Area 1 Landscape Rendered Masterplan  
Development Area 1 Landscape GA Plan  
Proposed Development Area 1 Seating Plan  
Proposed Site Wide Landscape Level Plan  
Proposed River Terrace Boundary Wall Treatment Plan  
Proposed Site Wide Circulation Plan - Vehicular  
Proposed Site Wide Circulation Plan - Cycle  
Proposed Site Wide Circulation Plan - Pedestrian  
Development Area 1 Flood Defence Plan  
Proposed Site Wide Hard Landscape Plan  
Existing Site Wide Hard Landscape Plan  
Proposed Outline Application Hard Landscape and Soft Landscape Areas  
Proposed Outline Application Open Space Plan  
Proposed Outline Application Landscape Principles Plan  
Proposed Outline Application Open Space with Play Space Location  
Proposed Outline Application Circulation Plan - Vehicular  
Proposed Outline Application Circulation Plan - Cycle  
Proposed Outline Application Circulation Plan - Pedestrian  
Proposed Green Link Section  
Proposed Entry Plaza Section  
Proposed Thames Street Section  
Proposed Residential Street Section  
Proposed Bottleworks Square Section  
Proposed Maltings Plaza Section  
Proposed River Terrace Section 1  
Proposed River Terrace Section 2  
Proposed Ship Lane Section 1  
Proposed Ship Lane Section 2  
Proposed Lower Richmond Road Section  
Proposed Detailed Application Typical Courtyard Section

Typical Extensive Green Roof Detail  
Typical Extensive Brown Roof Detail  
Typical Extensive Brown Roof Detail  
Typical Extensive Green Roof Detail  
Development Area 1 Riverwall Elevation from Towpath  
Rain Garden Typical Detail 1  
Rain Garden Typical Detail 2  
Typical Podium Tree Planting Detail  
Typical Ground Tree Planting Detail  
Indicative Proposed Watersports Centre  
Boat House Access to Existing Public Draw Dock Plan  
School Rendered Masterplan (Interim)  
School Rendered Masterplan (Final)  
School Landscape GA Plan (Interim)  
School Landscape GA Plan (Final)  
Internal Site Roads  
Possible Highway Layout  
Possible Sheen Lane and Level Crossing Improvements  
Temporary Access Road and Towpath Works  
Clifford Avenue / Lower Richmond Road - Proposed Highway Layout  
Lower Richmond Road / Mortlake High Street - Proposed Highway Layout

**Application B:**

Application B - Red Line Site Location Plan  
Application B Block Plan  
Z3 School - Proposed Site Plan  
Z3 School - Proposed Ground Floor Plan  
Z3 School - Proposed First Floor Plan  
Z3 School - Proposed Second Floor Plan  
Z3 School - Proposed Roof Plan  
Z3 School - Proposed Elevations  
Z3 School - Proposed Sections  
Z3 School - Proposed Bay Study Elevation  
School Rendered Masterplan (Interim)  
School Rendered Masterplan (Final)  
School Landscape GA Plan (Interim)  
School Landscape GA Plan (Final)

## Supporting documents

### Application A:

Accommodation Schedule - GIA  
Accommodation Schedule - GEA  
Accommodation Schedule - NSA  
Accommodation Schedule - Unit Mix Summary  
Affordable Housing Statement  
Air Quality EIA Report  
Arboricultural Report  
Archaeology EIA Report  
Assisted Living Demand Assessment  
Assisted Living Overview and Characteristics  
Built Heritage EIA Report  
CIL Form and CIL Form Notes (Appendices 1 and 2)  
Cover Letter  
Re-consultation cover letter  
Community Uses and Cultural Strategy  
Daylight, Sunlight, Overshadowing and Light Pollution EIA Report  
Design and Access Statement: Volume 1 Masterplan Proposals  
Design and Access Statement Volume 2: Detailed Design Statement  
Design and Access Statement Volume 3: Design Code  
DAS Addendum  
Drainage Strategy  
Ecology EIA Report  
Employment Assessment  
Energy Strategy  
Energy Strategy Addendum  
Circular Economy Statement  
Whole Life Carbon Reporting Tool  
Environmental Statement Volume 1: Main Text  
Environmental Statement Volume 2: Figures  
Environmental Statement Volume 3: Technical Appendices  
Environmental Statement Addendum  
ES Non-Technical Summary  
Financial Viability Assessment  
Fire Statement  
Foul Sewage and Utilities Assessment  
Framework Construction Management Statement  
Framework Delivery and Servicing Management Plan  
Framework Estate Management Strategy

Ground Conditions and Contamination EIA Report  
Health Impact Assessment  
Hotel Need Assessment  
Internal Daylight and Sunlight Assessment  
Landscape Design and Access Statement  
Lighting Masterplan  
Noise and Vibration EIA Report  
Noise Impact Assessment  
Odour Assessment Report  
Operational Waste Management Strategy  
Open Space and Playing Pitches Assessment  
Outline Car Management Plan  
Retail and Leisure Statement  
Site Waste Management Plan  
Socio-Economics EIA Report  
Sports Pitch Lighting Assessment  
Statement of Community Involvement  
Structural Impact Assessment  
Sustainability Statement  
Town Planning Statement  
Transport and Access EIA Report  
Transport Assessment  
Travel Plan: Framework  
Travel Plan: Residential  
Water Resources and Flood Risk EIA Report

**Application B:**

Design and Access Statement Volume 4: Secondary School Design  
Landscape DAS  
School Travel Plan

## Introduction

1 Having assumed authority to determine these planning applications, this report sets out the matters that the Mayor must consider in determining whether to grant or refuse planning permission and to guide his decision making at the upcoming representation hearing. This report includes a recommendation from GLA officers, as set out below.

## **Officer recommendation**

2 The Mayor, acting as the local planning authority, has considered the particular circumstances of these Applications against national, strategic and local planning policy, relevant supplementary planning guidance and all material planning considerations. He has also had regard to Richmond Council's Planning Committee Report dated 29 January 2020, all consultation responses and representations made on the case both to Richmond Council and the GLA. This report sets out in detail why these Applications are acceptable and, whilst there would be conflicts with some development plan policies, overall the application is considered to be in accordance with the development plan. There are no material considerations which indicate a decision other than in line with the development plan. As such these Applications are recommended for approval, subject to conditions and prior completion of a S106 agreement.

## **Section 106 legal agreement**

3 The following planning obligations are proposed within the section 106 legal agreement. The parties to the agreement are likely to comprise the GLA, Richmond Council, Transport for London and Reselton Properties Limited, on a joint and several liability basis.

### Affordable housing

4 As discussed in the housing section of this report, the section 106 agreement would secure the Applicants' offer of 30% affordable housing by habitable room, split 41% London Affordable Rent (LAR), 59% intermediate (Shared Ownership and London Living Rent) by habitable room; with appropriate obligations in relation to the definition, eligibility, affordability and perpetuity of affordable housing units across the various tenures. An early stage viability review mechanism would be secured to incentivise the delivery of the Site and ensure the appropriately timed delivery of affordable housing. A mid-term viability review mechanism at the occupation of the 400<sup>th</sup> dwelling, and a late stage viability review mechanism at 75% of total unit sales are proposed, which would potentially improve the tenure split of the affordable housing if scheme viability turns out to be better than currently anticipated. In addition, arrangements for the transfer of the LAR units to a Registered Provider, requirement on the developer to enter into a nominations agreement and obligations in relation to service charges for LAR and intermediate units would be secured.

### Transport

5 The following transport obligations would be secured, and further details are set out in the 'Transport' section:

- Chalkers Corner junction works: Option 2 as discussed in the 'Transport' section;
- A Sustainable Transport Fund of £350,000 as part of a manage and monitor approach to mode share targets in the Travel Plans and potentially implement further sustainable travel measures, including pedestrian/cycle infrastructure or a bus lane on Lower Richmond Road (noting that this would require the agreement of the Council);

- Travel Plans for both applications, along with a monitoring contribution of £30,000, to promote and monitor sustainable travel;
- Travel Plan bond for the secondary school, to incentivise sustainable travel and fund sustainable travel initiatives in the event of non-compliance with Travel Plan targets (amount to be agreed);
- Bus contribution of £3,675,000 towards enhanced capacity to mitigate bus trips from the development;
- Controlled Parking Zone (CPZ) consultation and implementation contribution of £130,000, to mitigate against potential parking overspill;
- Restriction on future residents applying for parking permits;
- Highways works;
- Bus infrastructure;
- Car club, 3 dedicated spaces on public highway and 2 years free membership for future residents;
- Safeguarding of land for potential future delivery of a cycle hire docking station;
- On street car parking: re-provision of spaces along Ship Lane and Williams Lane with electric charging infrastructure;
- Internal site roads, access and temporary access road;
- Contribution of £228,878 towards pedestrian improvement scheme on Lower Richmond Road, Mortlake High Street and Sheen Lane;
- Level crossing and overbridge works: additional bridge signage, general improvements to the pedestrian bridge, moving bollards back on both North and South Worple Way and setting back vehicle stop lines.

Other obligations:

- Provision of 10% affordable office space at 80% of market rent in perpetuity, including Workspace Management Plan / Strategy, in line with the requirements of the Site Allocation;
- Employment & Skills Plan / Local Employment Agreement (construction and operation), in line with the requirements of the Council's Planning Obligations SPD;
- Building Management Plan (B Use Class floorspace to be marketed to local firms and businesses in the first instance);
- Delivery of the community centre on the ground floor of Building 4 at peppercorn rent for a minimum period of 10 years, with cascade arrangements;
- Delivery of the boathouse in Building 9 for 10 years with associated water sports centre specification;
- Delivery of a cleared and serviced site to the Department for Education / LocatEd for the provision of a secondary school and sixth form – detail to be confirmed;
- Contribution towards enhancements to public parks and open spaces to mitigate the impacts of additional use associated with future occupiers of the development – amount to be confirmed;
- Delivery of public realm and public access to all open spaces and public realm within the development;



- Not to remove the pavilion and playing fields or implement Application B until a contract has been entered into with the ESFA / LocatEd / DfE for the school and sports facilities, and the Community Park;
- To reinstate the playing fields if the Community Park and school and sports facilities have not been completed within 5 years of commencement of Application B;
- Delivery of new indoor and outdoor sports facilities alongside the school;
- Playing pitch contribution of £18,000;
- Provision of Community Park and contribution (amount still under discussion);
- Barnes Eagles FC: Termination of licence - not be terminated until the initial contribution has been paid - £90,750;
- Barnes Eagles FC: Contribution of £45,375 per annum from third anniversary of vacation date until the replacement facilities have been provided on site;
- Barnes Eagles FC: Agreement for priority use of the 3G pitch within the scheme at an agreed rate (1 weekend and 2 evening sessions);
- A temporary licence allowing use of the grass pitches and the sports pavilion by Barnes Eagles FC until the school land is commenced;
- Noise: Covenant of use for new residents, which would build in lease restrictions to prospective tenants of the new neighbouring residential properties immediately fronting on to the sports pitches;
- Community Use Agreement;
- Towpath works and contribution - £44,265.
- Carbon offset payment to reflect zero-carbon requirement for all uses, with mechanism to allow a reduction if on-site carbon savings are increased on consideration of detailed energy strategies;
- 'Be seen' energy monitoring;
- Financial contributions of £90,000 and £60,000 towards air quality measures and compliance and regulation;
- Signage as part of highways works: stop idling signs, signage to identify congestion and air quality information forms;
- CAVAT bonds / contributions to be secured to compensate for the loss of trees as part of the development. Amounts and detailed arrangements to be confirmed;
- A contribution towards enhanced healthcare facilities off site, amount to be confirmed;
- Contributions towards a secondary waste collection or a private collection. If a contribution is required, it would be £53,475 per annum for Development Area 1 with contribution for Development Area 2 to be determined at Reserved Matters stage;
- Construction management and monitoring fee (£30,000);
- A contribution towards assessing and processing applications under the Control of Pollution Act and carrying out noise monitoring;
- Community liaison;
- Phasing / Programme Plan;
- Financial contribution paid to the Council to facilitate the monitoring of obligations within the agreement.

## Conditions

6 The following list provides a summary of the subject matter of conditions to be attached to any planning permission:

## Application A:

1. Commencement – Detailed
2. Submission of Reserved Matters and commencement – Outline
3. Compliance with approved plans and documents – Detailed
4. Compliance with approved plans and documents – Outline
5. Development Phasing
6. Reserved Matters to be submitted
7. Compliance Report
8. Site-wide Heat Network
9. Carbon dioxide emissions reduction
10. Temporary boiler replacement zero carbon technology feasibility report.
11. Construction logistics plan
12. Construction and Demolition Waste Management Plan
13. Noise and vibration Construction Method Statement
14. Dust Management Plan
15. Construction and Demolition Environmental Management Plan
16. Piling
17. Construction Activities (Thames Water)
18. Sustainable Drainage System
19. Flood Defence Inspection and Maintenance (Environment Agency)
20. Contamination Scheme (Environment Agency)
21. Landscape and Ecological Management Plan (Environment Agency)
22. Bomb damage investigation
23. Arboricultural Method Statement
24. Tree Planting Scheme – Development Area 1
25. Hard Landscaping Works – Development Area 1
26. Soft Landscaping Works – Development Area 1
27. Green/Brown Roof – Development Area 1
28. Fencing – Development Area 2
29. Archaeological Written Scheme of Investigation (GLAAS)
30. Historic Building Recording (GLAAS)
31. Engineering Method Statement
32. Historical Features
33. Specified details
34. Retained Heritage Buildings 4, 5 & 6
35. External Illumination
36. Sample Panels
37. PV Panels
38. Wind Conditions – Balconies
39. Electric Vehicle Charging Points
40. Air Quality – Emissions Control Scheme
41. Air Quality – Ventilation Strategy
42. Air Quality Neutral
43. Secure by design/CCTV
44. Noise protection – Residential
45. Noise protection from internal transmission
46. Towpath diversions
47. Towpath and Public Draw Dock Upgrade Works
48. Flood Protection Measures
49. Remediation and verification report (Environment Agency)

50. Flood Evacuation Plan
51. Thames Water Infrastructure – Residential
52. Surface Water Flows
53. Ecological Enhancements
54. Landscape Management Plan
55. Playspace
56. Vehicle Parking Spaces
57. Car Park Management Plan
58. Cycle Parking Spaces
59. Cycle access to basement
60. Signage
61. Public Access Strategy
62. Refuse arrangements and storage – Development Area 1
63. Refuse arrangements and storage – Development Area 2
64. Delivery and Servicing Plan – individual units/plots
65. Delivery and Servicing Plan – site wide
66. Estate Management Strategy
67. Hours of use – non-residential uses
68. Hotel – accessibility
69. Flood Risk Assessment (Environment Agency)
70. Restrictions on change of use
71. Retail (Class E)
72. Flexible Uses
73. High Street Zone
74. Cinema door
75. Hotel Use
76. External Seating
77. Residential Mix – Development Area 2
78. Residential Quantum – Plots 2A, 2B, 2C and 2D
79. Building Regulation M4(2) – Accessibility
80. Building Regulation M4(3) – Wheelchair
81. Soft Landscaping Quantum – Development Area 2
82. Restriction on use of roof
83. BREEAM Excellent – Non-residential units
84. BREEAM – Maltings Building
85. Contamination identification and remediation strategy (Environment Agency)
86. Surface Water – Ground Infiltration (Environment Agency)
87. Risk to groundwater (Environment Agency)
88. Permitted Development Restrictions
89. Windows – privacy
90. Gated Development
91. Mechanical Services Noise Control
92. Odour – commercial kitchen extraction system
93. Water consumption
94. Access Road
95. Cycle Hub
96. Wind conditions – Building 16
97. Flood defences
98. School Access Road
99. Air Quality Impacts
100. Low or Zero Carbon Technologies

101. Circular Economy Statement
102. Circular Economy (post-completion)
103. Fire Strategy
104. Whole life carbon
105. Free drinking water
106. Air quality positive
107. Digital connectivity
108. Urban Greening Factor

## Application B

1. Commencement
2. Sample panels of brickwork
3. Materials to be approved
4. Specified details required
5. Approved drawings
6. Restriction on alterations/extensions
7. Use restriction
8. Construction and Demolition Logistics Plan
9. Construction and Demolition Waste Management Plan
10. Noise and Vibration Construction Method Statement
11. Construction and Demolition Environmental Management Plan
12. Dust Management Plan
13. Cycle storage
14. Changing/shower facilities
15. Electric Vehicle Charging Points
16. Parking spaces for specified uses
17. Energy Strategy
18. Restriction on use of roof
19. External Illumination
20. Green/Brown Roof
21. Thames Water Construction Activities
22. Flood Risk Assessment (Environment Agency)
23. Site investigation (Environment Agency)
24. Contamination identification and remediation (Environment Agency)
25. Verification report (Environment Agency)
26. Sustainable Drainage System
27. Ground water infiltration (Environment Agency)
28. Piling
29. Flood Evacuation Plan
30. Air Quality – Emissions Control Scheme
31. Air Quality Neutral
32. Air Quality – Ventilation Strategy
33. Arboricultural Method Statement
34. Site monitoring procedures and recording methods
35. Tree Planting Scheme
36. Soft Landscaping scheme
37. Hard Landscaping Works
38. Tree Pit Design and Rooting Space
39. Ecological protection and enhancements
40. Green roof

41. Archaeological Written Scheme of Investigation – GLAAS
42. Floodlights
43. School and Colleges Internal Noise Protection Scheme
44. External School Facilities
45. Sports Playing Facilities and Multi Use Games Area (MUGA) Noise Control
46. Acoustic Fencing
47. Facilities (Sport England)
48. Details of external facilities (Sports England)
49. Details of 3G pitch (Sports England)
50. Community Use Agreement (Sports England)
51. Hours of Use (Sports England)
52. Management and maintenance scheme (Sports England)
53. BREEAM Excellent – School
54. Delivery and Servicing Plan – School
55. Operation waste management and refuse storage
56. Coach/mini-bus parking
57. Mechanical Services Noise Control
58. Odour – Kitchen extraction system
59. Pupil and Staff numbers
60. School Access Road
61. MUGA details
62. Circular Economy Statement
63. Circular Economy (post-completion)
64. Fire Strategy
65. Whole life carbon
66. Digital connectivity
67. Urban Greening Factor

## **Publication protocol**

7 This report has been published seven clear days prior to the Representation Hearing, in accordance with the GLA’s ‘Procedure for Representation Hearings’. Where necessary, an addendum to this report will be published on the day of the Representation Hearing. This report, any addendum, and the Mayor’s decision on this case will be made available on the GLA website:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/former-stag-brewery-public-hearing>

## **Site description and heritage context**

8 The application site comprises two linked applications, for the ‘Main Application Site’, the subject of Application A (the former brewery) and Application B (the sports ground historically associated with the brewery). There was previously a third application (Application C) concerning the area of land surrounding the Chalker’s Corner road junction of Lower Richmond Road and Clifford Avenue, but this has been withdrawn by the applicant.

9 The application site in respect of Applications A and B comprises a total area of 8.6 hectares, which is bound by Bulls Alley to the east, the River Thames and Thames Bank to the north, Williams Lane to west, and Lower Richmond Road / Mortlake High

Street to the south. The site is bisected in a north-south direction by Ship Lane, resulting in two parcels of 3.1 and 5.5 hectares in area respectively.

10 Vehicle access to the site currently occurs via gated entry points on Williams Lane, Ship Lane and Lower Richmond Road (just north of its intersection with Sheen Lane - the B351). The centre of the site is situated approximately 800 metres north of Mortlake Rail Station. There is a single bus route (419) within walking distance using stops located on Lower Richmond Road/Mortlake High Street. The site has a public transport accessibility level (PTAL) ranging from 1a to 2, on a scale of 1 to 6b where 6b is the most accessible, although as noted in the 'Transport' section, a small part of the site does score PTAL 3.

11 The main application site is presently occupied by a mixture of industrial buildings of varying ages and scales, owing to the site's former and historical industrial use as a brewery. Continuous industrial use of the site as a brewery dates from the 1800's to the cessation of brewing activities on the site in 2015. Temporary approval has been granted for film production use of the site since the cessation of brewing activities. Whilst the majority of the industrial buildings are of a modern and functional architectural character, there are three locally listed buildings of townscape merit contained on the site, which comprise:

- The nine storey maltings building, constructed circa 1902, situated adjacent the River Thames on the eastern side of Ship Lane;
- The three storey former bottling building, constructed 1869, situated adjacent to Mortlake High Street on the site's southern boundary; and;
- The three storey former hotel building, dating from the late 19<sup>th</sup> century, which adjoins the bottling building at the corner of Mortlake High Street and Sheen Lane on the site's southern boundary.

12 There are no statutorily listed heritage buildings on the application site. The southern and north-western corner of the eastern segment (east of Ship Lane) lie within the Mortlake Conservation Area. The separate Mortlake Green Conservation Area is situated immediately adjacent to the site across Lower Richmond Road to the south of the application site and includes a small number of properties which adjoin the application site on the northern side of Lower Richmond Road to the immediate west of Ship Lane. The Grove Park Conservation Area, within LB Hounslow, is also located to the north.

13 In addition to industrial buildings, the south western portion of the site immediately adjacent to Williams Lane and Lower Richmond Road is occupied by Watney's Sports Ground. This includes a private grass playing surface of approximately 2 hectares in area, as well as an associated two-storey sports pavilion building which is situated on the eastern flank of the turfed playing fields. There is no formal public access to the sports facilities, having been historically provided as a recreation facility for brewery employees. Notwithstanding this, the facilities are utilised by the youth division of the Barnes Eagles Football Club, as well as both Thomson House School and the St Mary Magdalen School. The existing playing pitches are also designated as local open space within Richmond Council's Local Plan, being classified as 'Other Open Land of Townscape Importance' (OOLTI).

14 Surrounding development to the east, south and west of the main application site is predominantly residential in nature and characterised by a mixture of terraced housing and residential apartment buildings, which generally range between two and four storeys in height. To the north-west of the application site, situated on Thames Bank and stretching from the Ship Inn to Chiswick Bridge, are a series of larger residential dwellings ranging from two to three storeys in height. These houses are prominently visible from the River Thames and include the following listed buildings:

- Grade II Listed Thames Cottage at 1 & 2 Thames Bank
- Grade II Listed Tudor Lodge, Thames Bank
- Grade II Listed Thames Bank House
- Grade II Listed Leydon House, Thames Bank
- Grade II Listed Riverside House, at 1-8 Thames Bank
- Grade II Listed Garden Wall, east of 1-8 Riverside House and behind 1-24 Reid Court

15 In addition to those listed above, the following additional listed properties are situated in close proximity to the main application site:

- Grade II Listed Gateway, formerly to Cromwell House, situated on Williams Lane approximately half way down the western boundary of the main application site.
- Grade II Listed Cottage buildings at 44 & 46 Victoria Road, situated approximately 65 metres south of Bulls Lane on the application site's eastern boundary.
- Grade II Listed Parish Church of St Mary, approximately 165 metres to the east of the site's eastern boundary, and on the southern side of Mortlake High Street.
- Grade II Listed Acacia House, at 115 Mortlake High Street.
- Grade II Listed house at 117 Mortlake High Street.
- Grade II Listed Suthrey House and attached Railings, at 119 Mortlake High Street.
- Grade II Listed Chiswick Bridge and Attached Balustrades.
- Grade II Listed Barnes Railway and Pedestrian Bridge.

## **Site and area specific designations and allocations**

16 Redevelopment of the site is the subject of the Stag Brewery, Mortlake, SW14, Planning Brief Supplementary Planning Document (SPD) adopted July 2011. The planning brief outlines the Council's Vision for redevelopment of the site with a mixture of land uses incorporating residential and commercial uses whilst establishing a new 'village heart' for Mortlake. Specific objectives of the planning brief for the site include:

- A single long-term masterplan for coordinating redevelopment of the site.

- Creation of a new green link between Mortlake Green and the River Thames.
- A mix of vibrant commercial uses, particularly in the eastern portion of the site, which should include a variety of employment, community and leisure activities.
- Provision of affordable workspace and high-quality mixed tenure housing.
- Reuse of buildings of townscape merit.
- An active and publicly accessible river frontage, noting the historic importance of the site as the finish of the Oxford versus Cambridge boat race.
- High quality, sustainable and inspirational design.
- Mitigation of transport and parking impacts on the surrounding area.
- Financial and commercially viable and deliverable redevelopment.

17 Richmond Local Plan Site Allocation SA 24 ‘Stag Brewery, Lower Richmond Road, Mortlake’ covers the whole of the application site. The site allocation supports the comprehensive redevelopment of the site with a mix of land uses to deliver a new ‘village heart’ for Mortlake. Envisioned land uses for the site include a new 6-form entry secondary school, plus sixth form; in addition to housing, employment, health, community and social infrastructure uses. Sports and leisure uses, including river related uses and the retention and upgrade of the existing playing fields, are required of any redevelopment. In addition, high quality public open spaces and public realm must be provided, particularly to provide linkages between publicly accessible green space and the river frontage. The site allocation is consistent with the Local Plan Area of Mixed Use designation.

18 The site is situated within the Mortlake and Barnes Archaeological Priority Area, as well as Flood Risk Zone 3 and partly within the Thames Policy Area. The site benefits from flood defences including a flood defence wall which is situated on the northern boundary of the site and constructed from a mixture of existing boundary and building walls. The site is within and comprises a number of locally designated vistas and landmarks, including the view from Chiswick Bridge. The current River Thames footpath is designated as public open space. The River Thames itself is designated as Metropolitan Open Land (MOL) and a Site of Importance for Nature Conservation.

## **Details of the proposal**

19 The proposal together comprises the following two linked planning applications:

- Application A – 18/0547/FUL – A hybrid planning application for mixed residential and commercial development of the wider Former Stag Brewery site.
- Application B – 18/0548/FUL – A detailed application for the development of a new secondary school, including sixth form.

20 The Hybrid Planning Application (‘Application A’) comprises a mixture of detailed and outline elements, which together propose:

- 1,250 new residential units
- 30% affordable housing, with a tenure split:
  - 36% London Affordable Rent (LAR)



- 64% Shared Ownership
- 13,917 sq.m of new town centre uses, which are concentrated on the portion of the main application site situated east of Ship Lane.

<b>Town Centre Use</b>	<b>Area – sq.m</b>
Flexible commercial	5,023
Office	5,523
Cinema	1,606
Hotel	1,765
<b>Total</b>	<b>13,917</b>

Table 1.0: Proposed town centre uses

- Flexible commercial uses are proposed to accommodate a mixture of A1/A2/A3/A4/B1/D1 and Sui Generis (boathouse) uses.

21 Detailed planning permission is sought for the following elements in the portion of the 'Application A' site which is situated east of Ship Lane:

- Demolition of all existing buildings (excluding The Maltings, facade of the Bottling Plant and Former Hotel), walls, associated structures, site clearance and groundworks.
- Alterations and extensions to existing buildings.
- Erection of new buildings varying from 3 to 10 storeys in height, with basements excavated from one to two storeys below ground, which contain:
  - 576 residential units
  - 5,023 sq.m. Flexible use floorspace for:
    - Retail, financial, professional services, cafe/restaurant and drinking establishment uses.
    - Offices.
    - Non-residential and community uses.
    - Boathouse.
  - A 1,765 sq.m. hotel/public house with accommodation.
  - A 1,606 sq.m. cinema.
  - 5,523 sq.m. office floorspace.
- New pedestrian, vehicle and cycle routes, and associated highways works.
- On-site cycle, vehicle and service parking at surface and basement levels.
- Landscaped public open space, amenity and play space.
- Flood defence and towpath works.
- Installation of plant and energy centres.

22 Outline planning consent, with all matters reserved, is sought for the following elements situated in the portion of the 'Application A' site located to the west of Ship Lane:

- 674 residential units, in buildings ranging from 3 to 8 storeys in height and including a single storey basement.
- On site cycle, vehicle and service parking.
- Provision of landscaped public open space, amenity and play space.
- New pedestrian, vehicle and cycle routes, and associated highways works.

23 The school application ('Application B') seeks detailed planning permission for the erection of a three storey building to provide a new secondary school, including sixth form. The application also comprises:

- Sports pitch with floodlighting.
- External Multi-Use Games Area (MUGA) and play space.
- Landscaping.
- Car and cycle parking.
- New access routes and associated highways works.

24 The outline element is accompanied by a Design Code, which would be used to control the quality of future Reserved Matters Applications. The Design Code includes mandatory and discretionary site-wide requirements relating to layout, architecture, and landscape, with specific requirements for each development plot.

25 The outline element is also accompanied by Parameter Plans, which allow some flexibility within specified parameters, and would be secured by condition as part of any permission.

## **Relevant planning history**

### Site history

26 The application site has been utilised as an industrial brewery since the late 1800s. An extensive record of numerous planning applications relating to the site's former use as an industrial brewery is available as far back as the 1960s. These applications include a mixture of new buildings, additional accommodation, car parks, gates, advertisements, industrial uses, treatment plant works, storage structures, slip roads and bottling plants. There are also historical applications for works to the towpath wall and boundary walls which surround the site.

27 The south-western portion of the site, which features private playing fields associated with the brewery, also exhibits an extensive planning history associated with its historical use for this purpose. This includes applications for the construction, demolition and replacement of the sports pavilion building, temporary use of the sports ground for car parking, and tree works on the surrounding grounds.

### GLA Pre-Application Advice

28 Pre-application meetings were held with GLA officers on 17 January 2017, 6 April 2017, 30 August 2017 and 30 January 2018. Whilst GLA officers offered support in principle for the comprehensive residential-led redevelopment of the site and the provision of a school, key issues for further consideration included the net loss of playing

fields, the provision of affordable housing and the transport and highways impacts of the proposals.

### Current applications

29 The three applications (including the now withdrawn Application C for the Chalkers Corner highway works) were submitted to Richmond Council in January 2018 and proposed to be linked with a single s106 agreement.

30 Following an initial period of public consultation, and further discussions with LBRUT officers during the course of assessment, the schemes were amended with revised plans and details submitted to Richmond Council in May 2019. The revisions proposed, as considered by the Mayor at Stage 1 and the subsequent LBRUT planning committee in January 2020, comprised the following application descriptions:

#### *Application A – 18/0547/FUL*

Hybrid application to include:

- The demolition of existing buildings and structures, except The Maltings and the facade of the Bottling Plant and former Hotel; Site clearance and groundworks, to allow for the comprehensive phased redevelopment of the site:
- Detailed application for works to the east side of Ship Lane which comprise:
  - Alterations and extensions to existing buildings; erection of buildings (3 to 8 storeys) plus basements to allow for residential apartments; Flexible use floorspace for various commercial uses, community and leisure; and hotel, cinema, gym and office floorspace
  - New pedestrian, vehicle and cycle accesses and associated highway works
  - Provision of on-site cycle, vehicle and service parking at surface and basement level
  - Provision of public open space, amenity and play space and landscaping
  - Flood defence and towpath works
  - Installation of plant and energy centres
- Outline application, with all matters reserved for works to the west of Ship Lane which comprise:
  - Single storey basement and buildings varying in height from 3 to 7 storeys
  - Residential development
  - Nursing and care home with associated facilities
  - Flexible use living accommodation for either assisted living or residential use
  - New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works
  - Provision of on-site cycle, vehicle and service parking
  - Provision of public open space, amenity and play space and landscaping.

### *Application B – 18/0548/FUL*

- The erection of a three storey building to provide a new secondary school with sixth form; sports pitch with floodlighting, external MUGA and play space; and associated external works including, landscaping, car and cycle parking, new access routes and associated works.

### *Application C – 18/0549/FUL*

- Reconfiguration of Chalkers Corner traffic junction, to include existing public highway and existing landscaped and informal parking area associated to Chertsey Court, to facilitate alterations to lane configuration, a new cycle lane, works to existing pedestrian and cycle crossing, soft landscaping and replacement boundary treatment to Chertsey Court.

### Stage 1 Report

31 The Applications were referred to the Mayor by Richmond Council on 9 April 2019, comprising development as described in the preceding paragraphs of this report.

32 The Applications were referred under the following Categories of the Schedule to the Mayor of London Order 2008:

- *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— (c) outside Central London and with a total floorspace of more than 15,000 square metres.”*
- *1C – “Development which comprises or includes the erection of a building (a) of more than 25 metres high and is adjacent to the River Thames.”*
- *3C – “Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which— (a) is used as a playing field at the time the relevant application for planning permission is made; or (b) has at any time in the five years before the making of the application been used as a playing field.”*

33 Application C was linked to the delivery of the more substantial development and was therefore referable by virtue of paragraph 2 of the Schedule.

34 On 30 July 2018, the Mayor considered planning report GLA/4172,4172a & 4172b/01 (the ‘Stage 1 Report’). The report advised Richmond Council that while the redevelopment of this brownfield site for mixed use development was supported in line with London Plan and draft London Plan policies, the Applications did not fully comply with the London Plan and the draft London Plan; noting issues relating to unacceptably low affordable housing provision (17%), residential quality, transport and sustainability to be addressed.

35 Following public consultation on the application undertaken by Richmond Council, a revised Environmental Statement (May 2019) was submitted to Richmond Council by the applicant, alongside revised and amended proposal details. Amendments to the scheme comprised:

- Internal configuration changes to building layouts and levels in buildings 2, 3, 6, 8 and 9
- Reduction in four residential units
- Change in land use areas
- Landscaping changes
- Alterations to building materials and facade treatments

#### LBRUT Planning Committee (January 2020)

36 On 29 January 2020, Richmond Council considered the three linked Applications (the 'Committee schemes'). The Council resolved to approve Applications A and B in line with officer recommendations, and to refuse Application C against officer recommendation, for the following reasons:

- Trees: The development, by reason of the proposed siting of the highway works; the subsequent loss of highly prominent trees of townscape and amenity value, and the inadequacy of the proposed planting and CAVAT contribution that are not deemed to sufficiently mitigate the harm caused by the loss of the existing trees, would represent an unacceptable form of development, that would harm the visual amenities of the streetscene, surrounding residential properties and area in general, contrary to policy, in particular policies LP 1, LP 8 and LP 16 of the Local Plan; policy 7.21 of the London Plan and the National Planning Policy Framework.
- Other Open Land of Townscape Importance and Unneighbourly: The development, by reason of the encroachment of the public highway and footway towards and within Chertsey Court and the consequential loss of Other Open Land of Townscape Importance, which is of value by reason of its presence, green nature and openness, would represent an unacceptable and unneighbourly form of development that would harm the green openness and character of both the grounds within Chertsey Court and the kerb side adjacent, to the detriment of the visual amenities of surrounding residents, streetscene and area in general. The development would thereby be contrary to policies, in particular LP 1, LP 8 and LP 14 of the Local Plan and the National Planning Policy Framework.
- Air Quality: The development, by reason of, its location within an Air Quality Management Area and Air Quality Focus Area; the proposed alterations and increase to the size of the road network; the subsequent reduction in width of the public realm; and the absence of acceptable mitigation to protect the users of the pedestrian network; would result in a poor walking environment and increase the risk of exposure to poor air quality in an area that already suffers from high levels of pollution. The development is thereby contrary to policies, in particular policies LP 10, LP 30 and LP 44 of the Local Plan, policy 7.14 of the London Plan and the National Planning Policy Framework, all of which aim to improve local environmental conditions such as air quality, minimise increased exposure to existing poor air quality, and enhance existing walking networks and people's health and wellbeing.

## Stage 2 Report

37 On 4 May 2020, the Deputy Mayor for Planning, Regeneration and Skills (acting under delegated authority) considered a planning report reference GLA/4172,4172a & 4172b/02 (the 'Stage 2 Report'). The report concluded that having regard to the details of the applications and the development proposed, to the matters set out in Article 7(3) of the Order 2008, to the relevant planning issues, the Council's committee report and draft decisions; the nature and scale of the proposed development and the issues raised gave rise to significant impacts on the implementation of the London Plan with respect to housing, affordable housing supply and education. Consequently there were considered to be sound planning reasons for the Mayor to intervene in this case and issue a Direction pursuant to Article 7 of the 2008 Order that he would act as the Local Planning Authority for the purpose of determining the Applications. The Deputy Mayor agreed with this recommendation.

38 The Stage 2 Report identified that there were matters requiring further consideration and resolution in light of the Council's resolutions, including the delivery of housing and affordable housing as well as highways impacts and potential mitigation. The applications for the highways works and school formed part of the wider scheme and, as such, it was considered that all three applications should be considered together.

## Subsequent Amendments - Resubmission Scheme (July 2020)

39 Since the Deputy Mayor issued the direction, GLA and TfL officers have worked with the applicant to resolve these issues through clarifications, revisions, draft planning conditions and draft section 106 agreement provisions, as discussed in this report. A further set of amendments ('July 2020 Amendments') was subsequently submitted by the applicant comprising the following key changes to the combined development scheme:

- Increase in number of residential units to 1,250 (previously 813 units, which included up to 150 flexible assisted living and/or residential units).
- Increase in affordable housing provision from 17% to 30%.
- Increases in building height by up to three storeys.
- Changes to the layout of Buildings 18 and 19.
- Conversion of Building 20 from a row of terraced housing to a pair of four storey buildings.
- Reduction in car parking provision by 186 spaces, with subsequent reduction in the size of the western basement.
- Introduction of a basement level below Building 1 (cinema).
- Amendments to internal layouts, and changes to the quantum and mix of uses across the site.
- Landscaping amendments, with canopy removal of four trees in the north-west corner of the site.
- Alternative highways options investigations for Chalkers Corner Junction, in order to mitigate highways impacts.

- Minor amendments to the road and pedestrian layouts for the School (Application B).

40 The revised proposals resulting from the July 2020 Amendments were subject to a public consultation period which ran from 20 August 2020 to 27 September 2020. Details of the consultation and responses are contained in the consultation section of this report.

#### Further Amendments - Resubmission Scheme (September 2020)

41 As a result of further discussions between the applicant, GLA and TfL officers, further minor amendments to the proposals and additional application information was submitted by the applicant on 28 September 2020 ('September 2020 Amendments'). The revised and additional information included:

- A revised Design Code.
- Revised drawings, including amendments to the design of Block 01 (cinema) which result in the reduction in building height by 2 metres.
- A revised Design and Access Statement Addendum.
- A revised Environmental Statement, including additional details regarding the revised Block 01 Design.
- A revised Energy Strategy Addendum.
- A Circular Economy Statement.
- A Whole Life Carbon Assessment.
- Further drawings.

42 The further revised proposals resulting from the September 2020 Amendments were subject to a public consultation period which ran from 1 October 2020 to 31 October 2020. Details of the consultation and responses are contained in the consultation section of this report.

#### Withdrawal of Application C (LPA ref: 18/0549/FUL)

43 Further to the alternative proposals for highways mitigation put forward by the applicant in the amended submissions, which were subject to public consultation, GLA and TfL officers have concluded that the Application C proposals for Chalkers Corner are no longer required. As such Application C has been withdrawn by the applicant. The alternative approach to the mitigation of highways impacts associated with the development is discussed in detail in the transport section of this report.

#### Further Transport Information (February 2021)

44 The applicant subsequently submitted additional information in response to issues raised during previous consultations, comprising:

- Technical Note TN039 – Detailing transport impacts resulting from the closure of Hammersmith Bridge.
- Technical Note TN040 – Providing the applicant's response to transport issues raised during previous public consultation processes.

- Technical Note TN041 – Providing a summary of traffic modelling findings.
- Highway Mitigation Option Plans.

45 This information was subject to a public consultation which ran from 8 February 2021 to 8 March 2021. Details of the consultation and responses are contained in the consultation section of this report.

46 The Mayor will undertake an accompanied Site visit with representatives from the GLA, TfL, Richmond Council, and the applicant.

47 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

## **Relevant legislation, policies and guidance**

48 These applications for planning permission must be determined by the Mayor in accordance with the requirement of Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004. In particular, the Mayor is required to determine the applications in accordance with the development plan, unless material considerations indicate otherwise. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area consists of the Richmond Local Plan (2018 and 2020), Joint West London Waste Plan (2015) and the London Plan (2021).

49 Paragraph 213 of the NPPF states that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the NPPF, and that due weight should be given to them, according to their degree of consistency with the NPPF. All relevant policies in the adopted development plan are considered to be consistent with the NPPF.

50 The Mayor is also required to have regard to national planning policy and guidance, as well as supplementary planning documents and, depending on their state of advancement, emerging elements of the development plan and other planning policies.

51 The relevant planning policies and guidance at the national, regional and local levels are noted in the following paragraphs.

### National planning policy and guidance

52 The National Planning Policy Framework (NPPF) provides the Government's overarching planning policy framework. First published in 2012, the Government published a revised NPPF in July 2018 and a further revised NPPF in February 2019. The NPPF defines three dimensions to sustainable development: an economic role – contributing to building a strong, responsive and competitive economy; a social role - supporting strong, vibrant and healthy communities; and, an environmental role - contributing to protecting and enhancing the natural, built and historic environment. The sections of the NPPF which are of particular relevance to these applications are:

2. Achieving sustainable development
4. Decision-making
5. Delivering a sufficient supply of homes
6. Building a strong, competitive economy



7. Ensuring the vitality of town centres
8. Promoting healthy and safe communities
9. Promoting sustainable transport
11. Making effective use of land
12. Achieving well-designed places
14. Meeting the challenge of climate change, flooding and coastal change
15. Conserving and enhancing the natural environment
16. Conserving and enhancing the historic environment

53 A key component of the NPPF is the presumption in favour of sustainable development. In terms of decision making, this means approving applications that accord with the development plan without delay; or, where there are no relevant development plan policies, or where the policies most important for determining the application are out-of-date, granting permission unless either: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole; or where NPPF policies that protect areas or assets of particular importance (including designated heritage assets) provide a clear reason for refusing a proposed development.

54 The National Planning Practice Guidance is also a material consideration.

#### Spatial Development Strategy for London and supplementary guidance

55 The London Plan 2021 is the Spatial Development Strategy for Greater London. In addition to the Good Growth objectives in Chapter 1, the following policies in the London Plan 2021 are relevant:

- Policy SD6 Town centres and high streets;
- Policy SD7 Town centres: development principles and DPDs;
- Policy SD8 Town centre network;
- Policy D1 London's form, characteristic and capacity for growth;
- Policy D2 Infrastructure requirements for sustainable densities;
- Policy D3 Optimising site capacity through the design-led approach;
- Policy D4 Delivering good design;
- Policy D5 Inclusive design;
- Policy D6 Housing quality and standards;
- Policy D7 Accessible housing;
- Policy D8 Public realm;
- Policy D9 Tall buildings;
- Policy D10 Basement development;
- Policy D11 Safety, security and resilience to emergency;
- Policy D12 Fire safety;
- Policy D13 Agent of Change;
- Policy D14 Noise;
- Policy H1 Increasing housing supply;
- Policy H4 Delivering affordable housing;
- Policy H5 Threshold approach to Applications;
- Policy H6 Affordable housing tenure;
- Policy H10 Housing size mix;
- Policy H13 Specialist older persons housing;

- Policy S1 Developing London’s social infrastructure;
- Policy S2 Health and social care facilities;
- Policy S3 Education and childcare facilities;
- Policy S4 Play and informal recreation;
- Policy S5 Sports and recreation facilities;
- Policy S6 Public toilets;
- Policy E1 Offices;
- Policy E2 Providing suitable business space;
- Policy E3 Affordable workspace;
- Policy E4 Land for industry, logistics and services;
- Policy E7 Industrial intensification, co-location and substitution;
- Policy E9 Retail, markets and hot food takeaways;
- Policy E10 Visitor infrastructure;
- Policy E11 Skills and opportunities for all;
- Policy HC1 Heritage conservation and growth;
- Policy HC3 Strategic and local views;
- Policy HC6 Supporting the night time economy;
- Policy HC7 Protecting public houses;
- Policy G1 Green infrastructure;
- Policy G3 Metropolitan Open Land;
- Policy G4 Open space;
- Policy G5 Urban greening;
- Policy G6 Biodiversity and access to nature;
- Policy G7 Trees and woodlands;
- Policy SI1 Improving air quality;
- Policy SI2 Minimising greenhouse gas emissions;
- Policy SI3 Energy infrastructure;
- Policy SI4 Managing heat risk;
- Policy SI5 Water infrastructure;
- Policy SI6 Digital connectivity infrastructure;
- Policy SI7 Reducing waste and supporting the circular economy;
- Policy SI12 Flood Risk Management;
- Policy SI13 Sustainable drainage;
- Policy SI14 Waterways – strategic role;
- Policy SI15 Water transport;
- Policy SI16 Waterways – use and enjoyment;
- Policy SI17 Protecting and enhancing London’s waterways;
- Policy T1 Strategic approach to transport;
- Policy T2 Healthy streets;
- Policy T3 Transport capacity, connectivity and safeguarding;
- Policy T4 Assessing and mitigating transport impacts;
- Policy T5 Cycling;
- Policy T6 Car parking;
- Policy T6.1 Residential parking;
- Policy T6.2 Office Parking
- Policy T6.3 Retail parking;
- Policy T6.4 Hotel and leisure uses parking;
- Policy T6.5 Non-residential disabled persons parking;

- Policy T7 Deliveries, servicing and construction;
- Policy T9 Funding transport infrastructure through planning; and
- Policy DF1 Delivery of the plan and planning obligations.

56 The following published supplementary planning guidance (SPG), strategies and other documents are also relevant:

*Supplementary Planning Guidance:*

- Affordable Housing and Viability SPG (August 2017);
- Housing SPG (March 2016);
- Social Infrastructure SPG (May 2015);
- Accessible London: achieving an inclusive environment SPG (October 2014);
- The control of dust and emissions during construction and demolition SPG (July 2014);
- Character and context SPG (June 2014);
- Shaping Neighbourhoods: play and informal recreation SPG (September 2012);
- All London Green Grid SPG (March 2012);
- Planning for Equality and Diversity in London (October 2007).

*Mayoral Strategies and other guidance:*

- Mayor's Environment Strategy (May 2018);
- Mayor's Housing Strategy (May 2018);
- Mayor's Transport Strategy (March 2018);
- London Cycle Design Standards (October 2016);
- Energy Planning Guidance (April 2020).

*Draft documents:*

- Good Quality Homes for all Londoners - consultation draft (October 2020);
- Public London Charter - consultation draft (October 2020);
- Circular Economy Statement Guidance - consultation draft (October 2020);
- Whole Life-Cycle Carbon Assessments - consultation draft (October 2020);
- 'Be Seen' Energy Monitoring Guidance - consultation draft (October 2020);
- Fire Safety Guidance – pre-consultation draft (March 2021);
- Air Quality Positive Guidance – pre-consultation draft (March 2021);
- Transport Land Guidance – pre-consultation draft (March 2021);
- Urban Greening Factor Guidance – pre-consultation draft (March 2021).

Local planning policy and guidance

57 The Richmond Local Plan (2018 and 2020) provides local development plan planning policies for the area. The Richmond Local Plan (2018) was subject to two successful High Court legal challenges made under section 113 of the Planning and Compulsory Purchase Act 2004. These challenges related to the Other Open Land of Townscape Importance (OOLTI) designation relating to St Michael's Convent (Site Allocation SA17), and the Local Green Space (LGS) designation at Udney Park Playing Fields. The Richmond Local Plan (2020) was subsequently adopted, incorporating changes which addressed these successful legal challenges.

58 The relevant policies of the Richmond Local Plan (2018 and 2020) are:

- LP 1 Local Character and Design Quality
- LP 2 Building Heights
- LP 3 Designated Heritage Assets
- LP 4 No-designated Heritage Assets
- LP 5 Views and Vistas
- LP 7 Archaeology
- LP 8 Amenity and Living Conditions
- LP 9 Floodlighting
- LP 10 Local Environmental Impacts, Pollution and Land Contamination
- LP 11 Subterranean Developments and Basements
- LP 12 Green Infrastructure
- LP 13 Green Belt, Metropolitan Open Land and Local Green Space
- LP 14 Other Open Land of Townscape Importance
- LP 15 Biodiversity
- LP 16 Trees, Woodland and Landscape
- LP 17 Green Roofs and Walls
- LP 18 River Corridors
- LP 20 Climate Change Adaption
- LP 21 Flood Risk and Sustainable Drainage
- LP 22 Sustainable Design and Construction
- LP 23 Water Resources and Infrastructure
- LP 24 Waste Management
- LP 25 Development in Centres
- LP 27 Local Shops, Services and Public Houses
- LP 28 Social and Community Infrastructure
- LP 29 Education and Training
- LP 30 Health and Wellbeing
- LP 31 Public Open Space, Play Space, Sport and Recreation
- LP 34 New Housing
- LP 35 Housing Mix and Standards
- LP 36 Affordable Housing
- LP 37 Housing Needs of Different Groups
- LP 40 Employment and Local Economy
- LP 41 Offices
- LP 42 Industrial Land and Business Parks
- LP 43 Visitor Economy
- LP 44 Sustainable Travel Choices
- LP 45 Parking Standards and Servicing
- SA 24 Stag Brewery Site Allocation

59 The following local supplementary planning guidance and documents are relevant:

- Air Quality (June 2020);
- Affordable Housing (April 2014);
- Buildings of Townscape Merit (May 2015);
- Design Quality (February 2016);

- Development Control for Noise Generating and Noise Sensitive Development (September 2018);
- Planning Obligations (June 2020);
- Refuse & Recycling Storage Requirements (May 2015);
- Residential Development Standards (March 2010);
- Shopfronts (March 2010);
- Sustainable Construction Checklist (January 2016);
- Transport (June 2020);
- Village Plan – Mortlake (January 2016); and
- Other planning guidance, including; Conservation Areas; Contaminated Land; Design for Maximum Access; Listed Buildings; Nature Conservation & Development; Food & Drink Establishments; Security by Design; Shopfront Security; Trees; Basement Development; Public Space Design Guide; Sustainable Drainage Systems.

60 The Stag Brewery Planning Brief Supplementary Planning Document (SPD) adopted July 2011 is also relevant.

### Community Infrastructure Levy

61 Local planning authorities in London are able to introduce Community Infrastructure Levy (CIL) charges, which are payable in addition to the Mayor's CIL. Richmond Council's CIL came into effect in November 2014 and in this location is charged at a rate of £250 per sq.m for residential development, £150 per sq.m for retail, with a nil charge for other land uses. Following the adoption of a new charging schedule, MCIL2 rates now apply to planning permissions granted from 1 April 2019. Accordingly, a rate of £80 per sq.m. would apply to all floorspace proposed, excluding the school. CIL liability would be subject to relief for affordable housing.

## **Consultation**

### **Richmond Council Notification (on previous scheme prior to call in)**

62 A total of 8 site notices were erected close to the site on 13 April 2018. A press notice was advertised in the Richmond and Twickenham Times on 13 April 2018. A total of 10,181 consultation letters were sent to neighbouring properties on 9 April 2018. The consultation also included all relevant statutory bodies, neighbouring boroughs and amenity groups. The three linked applications were advertised collectively, as major applications accompanied by an Environmental Statement.

63 In May 2019, further revisions to the scheme were submitted by the applicant. A re-consultation period then took place with 10,181 consultation letters posted on 24 June 2019, and a site notice published on 28 June 2019. A further press notice was advertised in the Richmond and Twickenham Times on 28 June 2019.

### **Statutory and Non-Statutory Consultee responses to Richmond Council**

64 Greater London Authority (including Transport for London): The Mayor's initial Stage 1 consultation response is summarised above and in GLA report ref: GLA/4172, 4172a & 4172b/01.

- 65 Ealing Council: No response
- 66 Hammersmith and Fulham Council: Highway authority objects on the basis of development and construction traffic on the public highway.
- 67 Wandsworth Council: No objection.
- 68 Hounslow Council: No objection, subject to adequate public transport capacity.
- 69 Historic England: No objection.
- 70 Greater London Archaeological Advisory Service (GLAAS): No objection, subject to conditions (included in draft decision).
- 71 Port of London Authority: No objection following amendments to the application.
- 72 Thames Water: Conditions and informatives requested (included in draft decision).
- 73 NHS England: No comments.
- 74 Hounslow and Richmond Community Healthcare: No comments.
- 75 Clinical Commissioning Group: Concern raised over healthcare impact including care home and extra care units. S106 contribution to healthcare required (secured in s106 for LBRUT draft decision).
- 76 Environment Agency: Original objection, but addressed through revised information. Conditions requested (adopted in LBRUT draft decision).
- 77 Lead Local Flood Authority: No objection following revised information, subject to conditions (adopted in draft decision).
- 78 National Trail: No objections following revised information on Thames Path.
- 79 Natural England: No objections.
- 80 Network Rail: No objection raised, but concern regarding projected usage of Mortlake Station and level crossing, and the modelling supporting the figures on projected additional demand.
- 81 Rail Infrastructure Managers – Network Rail: No objections
- 82 Royal Mail Group: Objection to Application B (school) on ‘Agent of Change’ principles, given impact of traffic congestion around the Barnes Delivery Office. School Travel Plan needs strengthening.
- 83 Sports England: Original objection withdrawn. Proposal meets Exception Test 5, subject to conditions and s106 terms.
- 84 British Rowing: Disappointed no rowing facilities in proposal.

### **Individual Neighbour Responses to Richmond Council**

85 The consultation generated 2,388 responses; 2,260 representations were in objection to the proposals (1,119 in response to Application A, 610 in response to Application B and 531 in response to Application C); 51 responses in support were received (26 in response to Application A, 19 in response to Application B and 4 in response to Application C); 77 responses were neutral or observations (51 in response to Application A, 14 in response to Application B and 12 in response to Application C).

86 The key issues raised by the consultations are outlined below, grouped by application reference and topic headings:

### Application A – Objection

#### *Land use*

- Housing: Acknowledged need for additional housing, however the development is out of character.
- School: Secondary school unnecessary.
- Care village: No objection to care home. However, query why care home beds are proposed so close to Barnes Hospital. There is already sheltered housing. Impacts should be considered in conjunction with Barnes Hospital.
- Commercial/community uses: The Maltings ground floor community centre is welcomed. However, the floor layout needs to be re-examined. Not Flexible. More cultural facilities needed. Missed opportunity for local micro-brewery, providing local employment. Already 3 pubs in close proximity. No need for hotel or cinema. Will undermine the Olympic Cinema. Shops/commercial use not necessary to serve the area and will undermine local shopping areas. Insufficient employment floorspace. Should provide more flexible space for small and medium businesses.

#### *Residential land use*

- Too many residents for the site. Density is too high and double the original consultation documents. The scheme will increase the population by 40%. Amount of residential (817+) is well above the 560 units in the Planning Brief.

#### *General housing*

- Quality of accommodation is poor. Need guarantee that the housing will not be an investment opportunity for people with no intention of making a home here. Against a 'rich ghetto' and units for overseas investment. Scheme maximises the numbers of 1 and 2 bed flats to maximise financial returns. Lack of family homes – too many apartments. The scheme should include a good mix of tenure and sizes of units with a high social and affordable provision. Any such units should be sensitively incorporated into and across the phased development. Should have larger flats suitable for downsizers.

#### *Affordable housing*

- Housing should be affordable, 20% affordable housing is insufficient and does not meet 50% policy requirement. Justification for low percentage of affordable

housing is inadequate and methodology flawed. Land price should be based on providing 50% affordable housing. Paying too much for the land is not a material consideration. Delivery of the affordable housing – late in the development, which may mean that provision is reduced over time. No affordable housing in Phase 1. Affordable housing should be provided throughout the development, on both sides of Ship Lane.

### *School*

- School site is too cramped with inadequate access and insufficient playing fields. Pupil numbers should be reduced. Sports field should be available for community use.

### *Health infrastructure*

- Need to involve CCG and NHS England. Need to resolve infrastructure first. Additional impact on local services, doctors, dentists, schools, hospitals and social services which are already oversubscribed. There should be a GP, dentist, surgery, pharmacy and primary care facilities within the site.

### *Community use*

- The ground floor layout proposed for flexible use of the Maltings is unsuitable. The applicants have not adopted the brief the community gave the architects. Space for community use requires management and office space. Some source of independent income is required to pay the running costs. Without these provisions, grant giving bodies are unlikely to be persuaded to fund the development. Question need for a boathouse.

### *Scale of development*

- Too dense and bulky. Site cannot sustain school and level of residential occupation – impact on traffic, pollution, and strain on infrastructure. Should be a significant reduction in the number of units. Overdevelopment and overcrowding. Should adhere to the scale of the development in the Planning Brief. Overpowering for those along the river bank. Urban development in a suburban location. North-western zone too dense and too high.

### *Layout*

- Missed opportunity for iconic riverside location. Orientation of blocks inappropriate. There is no visionary masterplan; plan too ambitious. Needs greater connectivity with surroundings. Compressed layout; blocks too close, creating overlooking, wind tunnels and deep shade, overshadowing of play space and public realm. School should be built adjacent to and not on the existing playing fields. Construction of two apartment blocks on the sports field is unacceptable. Geographical limitations are considerable – Mortlake is effectively cut off by the railway, river and Chalkers Corner. Open space and courtyards could become private rather than open areas. The ground floor active uses would be better focussed around the green link and Maltings Plaza. Access ramp to basement car parking still included, which faces onto Mortlake High Street – visually intrusive and does not comply with the spirit of the 2011 Planning Brief,



which encourages active uses of the High Street. Turns back on river. Does not create a heart for Mortlake. Will be a security risk. Need to open the river to the community. Butler House has been incorrectly sited – this should be resolved. Question the quality of the amenity space.

### *Design*

- Disappointing and uninspiring architecture and design. Out of keeping with local area. Soulless, straight and angular grid pattern; architecturally bland. Development does not respond to the existing heritage of the site or Mortlake. Development is urban in character and out of keeping. Change to the 'Village' atmosphere. Impact on skyline and Thames Path. Brick is glaring red. Cinema building looks alien. Retro-grade, developer-led project. Impact on river views. Too high and will represent a high rise development. Height exceeds brief. Height is out of keeping and character. Illustrations do not give true height of buildings. Development should be further away from river. Reduction in development will remove the need for Chalker's Corner works and deliver more affordable housing. Design Code should also include storey heights. Siting of school; should be in main development area. Contrary to scale and numbers envisaged in the Planning Brief. Lack of information around surrounding heights. Will be in excess of surrounding building heights – should be no higher. Buildings fronting Williams Land should be 2/3 storey.

### *Heritage*

- Scheme is adjacent to two conservation areas and will impact detrimentally on heritage assets, including listed buildings. Impact on St Mary's Church. Impact on archaeology. Impact on settings of heritage assets and vista. Roof of the hotel should be retained. Should protect whole of locally listed buildings, not just facade. Site should be preserved as a historic site of interest and managed by English Heritage, with a small amount of social housing. Loss of historic buildings. Need to protect plaques 'Stag sign' – wall on eastern gatehouse.

### *Open space, trees and ecology*

- Loss of trees, including TPO and mature trees. Additional trees needed to counteract the effects on air and noise pollution. Impact on nature conservation, birds, flora and fauna. Loss of Other Open Land of Townscape Importance (OOLTI). Inadequate replacement open space. Loss of sports field / recreation space. Lack of amenity space and needs more open space between blocks. Open spaces will not be public. Pressure on parks and green space
- Loss of sporting facilities and field. Sports field provides significant health and aesthetic benefits. Should include a boat club. Plastic surface cannot be compared to grass. Open space and playing fields assessment is flawed – ignores opportunity to retain and locate the school elsewhere. The artificial pitch is not re-provision. Should keep and relocate playing fields. The all-weather pitch, fencing and floodlighting would be intrusive and excessive. Open space should remain open to all and accessible at all times. Sports fields site is too small for a 11-18 secondary school.

### *Highways and transport*

- Transport Assessment flawed and misleading. Need for traffic survey.
- Highway safety: Increased accidents anticipated, implications for emergency services in response to additional congestion.
- Level crossing and station: Gates are down 50 minutes per hour. Should have a road bridge / tunnel at Sheen Lane crossing. The Sheen Lane junction is already deemed to be high risk by Network Rail. Should have wholesale redevelopment of Mortlake Station. Level crossings in Sheen Lane and White Hart Lane cause major hold ups. Pedestrian and vehicular risk at Sheen Lane level crossing not addressed.
- Road infrastructure: Should have a tunnel from the development under the river and overpass to Mortlake Road on other side of A316. Should provide real lane widening. Ship Lane and Williams Lane are too narrow and should be kept open. Road access insufficient for proposed number of dwellings. A one way road system should be put in place. Increased strain on local road / road network.
- Traffic: Scheme will exacerbate existing severe congestion and traffic generation, increasing delays. Chalker's Corner works proposed are insufficient and would not alleviate the problem.
- Parking: A lower density scheme would not need as much parking. Basement should be omitted and parking on site with management strategy. Impact on parking in surrounding streets. CPZ should be introduced. Proposal provides too little parking. Proposal provides too much parking and should be car free. Electric vehicle charging/car club spaces should be provided.
- Public transport: Local transport infrastructure cannot cope. Train and bus services need to be increased in number and frequency. Longer trains will result in the barriers having long down time. Mortlake Station overburdened. Trains already overcrowded. A river bus should be provided.
- Better infrastructure for cyclists and pedestrians needed.
- Hammersmith Bridge: Hammersmith Bridge may never open. Traffic impacts need to be reconsidered after closure. Development should be postponed until Hammersmith Bridge reopens. Traffic studies need to be updated. Roads cannot take anymore given chaos caused by Bridge closure.

#### *Residential amenity*

- Development would cause loss of light and overshadowing, impact on sunlight and daylight, impact on visual amenities, noise and disturbance, light pollution, loss of privacy, air pollution and detriment to health and wellbeing of local community, including impact on disabled / other vulnerable people.

#### *Air quality*

- Development will cause poor air quality and pollution, in particular with expanded ULC 2 and Heathrow. Impact on air quality as a result of tree loss. Health implications as a result of air pollution. Should record pollution levels, so there is

accountability. Number of deaths around London from poor air quality – air quality should be improved not reduced. Chalker’s Corner is already in an AQFA.

### *Sustainability and environmental impact*

- Development with large basement will increase flood risk.
- Lack of energy sustainability and renewable energy provision. Units should use electricity powered by solar panels. Since we have declared a Climate Emergency, the redevelopment should be exemplar of sustainable living and be car free.
- Smells and hazardous material.
- Construction impacts. River must be used during construction, site clearance and spoil removal. Impact from construction – workers traffic. Construction disturbance. Ship Lane and Williams Lane must be kept open and used during the demolition and construction process. Need protection from dust, mud and asbestos during works.

### *Other considerations*

- Objectionable to describe air quality / traffic as of ‘little significance’. Revisions proposed little change in scheme, insufficient amendments. Lack of evidence to support conclusions. Cumulative impact of other developments. No community involvement and lip service consultation. Land for Chalker’s Corner works is in residents’ leasehold. No adequate mitigation. Support the objections of Mortlake Brewery Community Group.

### Application A – Support

- Well considered, comprehensive schemes. Support for new school. Will create opportunities for first time buyers. Will create job opportunities. Much needed housing. Cinema and public space supported. Retention of historic buildings.

### Application B – Objection

#### *School*

- No justification for secondary school and new sixth form. Local primary schools are reducing in size due to changes in demographics. Expansion of other local schools should be delivered instead. Evidence of need is out of date. Planning Brief required a primary school and there was no consultation on the change to secondary school. Scale of school unclear. A primary school would take up less open space and could lead to more affordable housing. Thompson House/Thomas Cromwell school could be moved to the site. Other local schools aren’t at full capacity. Proposed school is too large and would impact on traffic. The community use of the sports facilities would worsen traffic. School will struggle to recruit staff given lack of parking and trains at capacity, and lack of affordable housing in the area. No consultation on type of school/Academy (Livingston Academy); Cromwell school is more supported locally. School site is cramped and is unlikely to provide a high quality learning environment.

### *Impact on neighbour amenity*

- School will cause noise disturbance; traffic and floodlighting will impact on quality of life.

### *Siting and design*

- School should not be next to the road. Represents overdevelopment. Insufficient infrastructure to cater for development. Scale and height is unacceptable. Design does not fit with shape of site. Exceeds heights of planning brief. Site too constrained, dominates river and towpath. School is small and cramped, with inadequate playing fields; should cater for a smaller number of pupils. Architecture dull and out of character with surroundings.

### *Open space*

- Loss of open space and OOLTI. Building on green space is contrary to policy. Only remaining real open space would be community park. Grass fields have health and aesthetic benefits and are not the same as astroturf pitches. There will be a reduction in area available for sports. Replacement pitch will be dominated by the few students. Loss of playing fields is contrary to Planning Brief. Loss of trees.

### *Highways and transport*

- School would exacerbate gridlocked traffic, and would cause unsafe highway conditions, especially at Mortlake level crossing. No parking for teachers or sixth form students. Application should not be decided before a long term solution for Hammersmith Bridge closure is implemented. Development would cause further strain on public transport, which cannot cope. More trains required at Mortlake Station; more bus services required.

### *Environmental issues*

- Loss of playing fields will lead to loss of ground drainage and increased flooding. Will have detrimental impact on environment and ecosystems. Development would cause noise and light pollution, poor air quality and traffic pollution.

### Application B – Support

- New school is needed in local area. Location, height and massing supported. Improvements to sports facilities, with access for local community, is supported.

### Application C – Objection

- Development would cause loss of trees, loss of OOLTI open space, and would be detrimental to the environment and nature conservation. Proposals would result in loss of residential amenity land, wrong that Chertsey Court residents should lose green space. Detrimental impact on residential amenity through visual intrusion, increased noise pollution and air pollution. Scheme would not reduce congestion and would instead add more traffic. No provision for cyclists. Hammersmith Bridge closure has not been taken into account. Development does not respond to climate crisis. A more radical solution is required, proposed Chalker's Corner

works are woefully inadequate. No need for Chalker's Corner works. Junction is already at capacity. A slip road between site and cemetery by Chiswick Bridge should be created. Scale of development should be reduced, with major improvement to public transport, instead of new junction. Revisions have ignored objections. Traffic calming measures should be explored.

### **Other responses to the Council**

87 Consultation responses were received from the following non-statutory bodies and local interest groups.

88 Mortlake Brewery Community Group: (including petition with 126 signatures): Whilst there are some positives including green link to river and housing need, there are significant concerns regarding density, height exceeding Brief, compressed overbearing layout resulting in overshadowing, design out of character, privatisation of courtyards. Viability of commercial uses and layout of community spaces questioned. Impact on traffic; traffic modelling questioned, the infrastructure cannot accommodate traffic, no strategy for improving public transport or addressing level crossing. Loss of playing fields and OOLTI, grass pitches should be provided. 35% affordable housing should be provided and affordable should be spread across the site. On site NHS facilities required. Evidence for secondary school questioned, demand could be met by expanding existing schools. School site is too small for numbers of pupils and should be located off the playing fields. ES findings and methodology questioned. Air quality impacts. Hammersmith Bridge closure needs addressing. Lack of meaningful consultation. Alternative proposals have been formulated by this group.

89 Mortlake Community Association: Objections: No affordable housing in phase 1, affordable housing should be spread across the site to achieve mixed community. Basement should be reduced to increase affordable housing. Over-density, no evidence of sustainability. Loss of open space and trees leading to increased pollution. Inadequate public transport improvements and problems of accessibility. Absence of provision for healthcare facilities. No need for/impact of retail. Layout of community floorspace unsuitable and requires ongoing funding and management. No concessions for less mobile residents. Objections not addressed by revisions.

90 Environment Committee of Barnes Community Association: Objections: unimaginative, soulless design, too many small units, height exceeds planning brief and should be reduced. Over-density, overlooking between dwellings. Traffic generation and impact on public transport. Loss of playing fields, sports provision and OOLTI. Chalker's Corner scheme does not provide sustainable travel, will increase traffic and pollution, will lead to loss of landscape, trees and OOLTI.

91 Williams Lane & Wadham Mews Residents: Support for location and height of school, retention of trees and provision of some green amenity space, height diminishing towards east, basement parking, mix of uses, community access and opening of riverside. Objections: impact on residential amenity (loss of light, overlooking, noise and disturbance and impact on visual amenity); flood risk, over-density, overbearing, density and scale exceeds planning brief, height of buildings in north-west zone, no provision for primary school, questionable evidence for secondary school, loss of playing fields, trees and open space, impact on ecology, effect on heritage assets, air quality, location of affordable housing, strain on infrastructure, lack of parking, materials not in keeping, lack

of viable transport mitigation, S106 and CIL should be publicly available, criticism over public consultation, no substantial changes to original scheme.

92 Mortlake and East Sheen Society: Object on height, design, density, environmental impact, air pollution. West of site should have greater mix of uses and reflect urban grain, affordable housing should be dispersed around the development and not concentrated in one area, should be a greater amount of key worker and less social rented accommodation. Size of school unsustainable, evidence for school questionable, demand can be met by expansion, poor location for school, impact of floodlights, loss of open space, grass and cricket ground. Impact on traffic, inadequate public transport. Too much parking. Impact on climate change. Chalker's Corner proposals will create traffic and lead to loss of trees and air pollution. Hammersmith Bridge closure needs to be modelled. Revisions minor, no change in building heights. Development has not been considered by Design Review Panel. Support alternative designs put forward by Mortlake Brewery Community Group. Heritage Consultant commissioned, raising concern about impact on heritage assets and local character.

93 Richmond Cycling Campaign: object on grounds of not improving links with cycle and pedestrian network, doesn't promote active travel, no improvements for cycling/inadequate provision for cyclists in development, excessive parking.

94 Richmond Park Constituency Labour Group: Development would have an enormous and potentially detrimental impact on wider area, increased traffic and resulting poor air quality, secondary school will increase the pressure on roads and public transport, increased pressure on level crossing, density should be reduced, buildings too high, layout is cramped, not in keeping with suburban character, first phase includes no affordable housing, impact on Chalker's Corner residents, car club and NHS facilities should be provided.

95 Kew Society: Object on grounds of air quality and view from north side of the river and Chiswick Bridge.

96 Barnes Community Association: Endorse observations from BCA Environment Group

97 Thames Bank Residents' Association: object on grounds of height, density, cramped layout, impact on historic buildings, increased traffic, loss of playing fields and open space, contrary to planning brief, public transport requires improvement, through traffic on Thames Bank should not be allowed, residents' parking restrictions required surrounding site, routing of construction traffic, pollution, height of buildings to north west, overbearing development to the east, impact on towpath, disruption to Thames Bank residents, no evidence for secondary school, lack of affordable housing, viability unrealistic, Chalker's Corner would add traffic, loss of trees, noise and pollution for residents. Concerns not addressed by revisions.

98 West London River Group: Support archaeological mitigation, alterations to windows on historic buildings would diminish their significance, demolition of historic boundary wall a significant concern. Clarity on flood defence boundary and railway track, paving and moorings. Need additional tree planting and bat boxes. Concern about overshadowing environment and habitat. Support provision of boathouse. Transportation by river should be reconsidered. Impact on towpath. Concerns not addressed by revisions.

99 Towpath Group: concerns raised over impact on towpath (overbearing, overshadowing, development out of character, litter, levels mustn't be raised, don't want interpretation boards or playspace, repairs required). Public access to towpath needs clarifying. Concerns not addressed by revisions.

100 Thames Path National Trail Partnership: no response to developer on objections. Thames Path is legally protected. Would like to see further mitigation in response to increased usage. Closure during construction should be clarified. Increases in width, improvements to surface and bank restoration and vegetation management should be considered.

101 Richmond Bat Species Action Group: Concern over scope and findings of bat survey, may have impact on bats.

102 Thompson House School (and Governing Body): Support proposals.

103 LBRUT Councillor Avon: objects on grounds of density, impact on residential amenity, sustainable development, lack of infrastructure, low PTAL, traffic impacts, Chalker's Corner not solving problems of traffic, impact on Mortlake level crossing and Station.

104 LBRUT Councillor Cambridge: concerns expressed regarding density, car parking, loss of playing fields and open space, bringing traffic closer to Chertsey Court and lack of infrastructure.

105 LBRUT Councillor Wilson: queried community space provisions.

106 LBRUT Councillors Warren, Baldwin and Pyne: concerns raised regarding construction traffic, traffic from completed development, felling of trees, school should be car free, playing field should be open to community, overcrowding at Mortlake Station.

107 LBRUT Councillor Bridges-Westcott: Concerns regarding community space provision, affordable housing provision, excessive car parking, air quality, construction impacts on roads and residents, impact on Chertsey Court residents from Chalker's Corner proposals, lack of infrastructure to support development.

108 LBRUT Councillor Hodgins: Support expressed for the secondary school in this location.

## **Representations to the Mayor of London**

109 Prior to the consideration of the Stage 2 referral of the application by the Deputy Mayor for Planning Regeneration and Skills, Jules Pipe, on 4 May 2020, there were 17 direct representations addressed to the Mayor regarding the proposal. These included representations from Caroline Pigeon AM and Tony Arbour AM, which requested the applications be called-in for determination by the Mayor. The 15 remaining representations were from local residents, and reiterated concerns listed above under the 'Individual Neighbour Responses to Richmond Council' heading of this report.

110 A re-consultation exercise took place from 19 August to 27 September 2020 in relation to the July 2020 Amendments to the proposals as summarised above. Two further re-consultation exercises then took place. The first from 1 October to 31 October 2020 in relation to the September 2020 amendments to the proposals, and the second

from 8 February to 8 March 2021 relating to further information provided by the applicant in respect of transport considerations and highway mitigation options.

111 In each re-consultation letters were sent to all those consulted by the Council within earlier consultations, in addition to all those who had responded to the planning applications thus far. A press notice was posted locally in the Richmond and Twickenham Times, and site notices were erected. The consultation was also publicised through social media (GLA Facebook and Twitter accounts).

### Richmond Council Response

112 On 29 October 2020, Richmond Council provided a written response outlining the Council’s position with respect to the revised proposals, as amended by the July and September 2020 amendments. A summary of the comments and concerns raised by Council in respect of the amended proposals at that time is detailed in the following table:

<b>Application A</b>	
Commercial Land Uses	<p><u>No objections, subject to conditions and Heads of Terms:</u></p> <ul style="list-style-type: none"> <li>Proposed B1 floorspace.</li> <li>Provision of 10% affordable office space.</li> <li>Employment and Skills Plan.</li> <li>Workspace Management Plan.</li> <li>Secure conditions to restrict the movement between subsections a-g of Use Class E to ensure a balance and avoid an over-concentration of uses.</li> <li>Limit the minimum and maximum retail provision,</li> <li>Secure the minimum retail provision along the High Street.</li> <li>Limit the size of units.</li> </ul> <p>(refer to conditions NS79 - NS83 of the Councils Planning Committee report).</p> <p><u>Points of clarification:</u></p> <ul style="list-style-type: none"> <li>Quantum of B1 floorspace.</li> </ul>
Housing	<p><u>No objection:</u></p> <ul style="list-style-type: none"> <li>Residential mix, subject to condition securing same mix within Development Area 2.</li> </ul> <p><u>Objection:</u></p> <ul style="list-style-type: none"> <li>Density (as demonstrated by the unacceptable height and subsequent impact on the character of the site and area).</li> </ul>
Affordable Housing	<p><u>Objection:</u></p> <ul style="list-style-type: none"> <li>Quantum fails to meet the Council’s and Mayor’s policy with respect to percentage of on-site provision.</li> </ul>



	<ul style="list-style-type: none"> <li>• Tenure mix failing to comply with both the Mayoral and Richmond policy requirements.</li> <li>• Phasing and delivery of the affordable housing.</li> <li>• Outstanding matters remain regarding affordability, financial viability (particularly BLV, absence of RP offers; use of blended value); oversized units, further modelling using grant Funding to adjust the affordable housing provision; review mechanism.</li> </ul> <p><u>Necessary Heads of Terms:</u></p> <ul style="list-style-type: none"> <li>• Quantum, phasing, triggers, mix, tenure</li> <li>• Affordability, taking account of the impact of service charges.</li> <li>• Review clauses (both to increase in numbers and number of homes for affordable rent).</li> <li>• Ensuring inputs, including deficit position, are fully evidenced and tested.</li> <li>• An overarching clause to determine that 'Implementation' does not include completion of basement works.</li> <li>• Details of the arrangements to ensure residents' access to the proposed communal areas.</li> <li>• Consultation and engagement with the Council's Specialist Occupational Therapist to ensure compliance with Building Regulations M4(3)(2).</li> </ul>
Design and height	<p><u>Objections:</u></p> <ul style="list-style-type: none"> <li>• Additional height and consequential impact on the quality of the development, heritage assets, views, Thames Policy Area, MOL and residential amenity.</li> <li>• Poor juxtaposition of buildings within the Site: <ul style="list-style-type: none"> <li>- Building 5, overwhelmed by the incompatible height of Blocks 6, 7 and 8</li> <li>- Buildings north and south of the new High Street</li> </ul> </li> <li>• Elevational treatments – in particular; additional floor to building 5 (and impact on heritage asset), additional massing of Building 8 and 11; turret detailing and fenestration.</li> <li>• Development Area 2 - height and massing and consequential impact on both residential amenity and heritage assets along Thames Bank; oversized dormers in townhouses;</li> <li>• Recommendations: <ul style="list-style-type: none"> <li>- use of fenestration to break up the massing and reduce the impact on the additional height and scale – in particular to blocks 2, 7</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- Amend materials associated to the Cinema building</li> </ul> <p><u>Outstanding matters:</u></p> <ul style="list-style-type: none"> <li>• Errors in submission – inconsistency between documents regarding Building 6, 9, 10.</li> <li>• Suitability of application only in outline given height and setting of heritage assets.</li> <li>• Lack of design scrutiny.</li> <li>• Design Code – clarity regarding setbacks (paragraph 3.4.1) and confirmation all units will be tenure blind.</li> </ul>
Internal Living Standards	<p><u>No objections:</u></p> <ul style="list-style-type: none"> <li>• Internal space standards, light, aspect and outlook; amenity and playspace.</li> </ul> <p><u>Objections:</u></p> <ul style="list-style-type: none"> <li>• Development Area 2 - Insufficient space between buildings and impact on quality of accommodation.</li> <li>• Insufficient detail – wheelchair accessible homes across all tenures.</li> </ul> <p><u>Matters for clarification:</u></p> <ul style="list-style-type: none"> <li>• Design Code and floor to ceiling heights.</li> </ul> <p><u>Necessary conditions / Heads of Terms:</u></p> <ul style="list-style-type: none"> <li>• Compliance with Building Regulations M4(2) and (3).</li> </ul>
Play space / outdoor space	<p><u>Playspace objection:</u></p> <ul style="list-style-type: none"> <li>• Quality and location of the proposed play space.</li> </ul> <p><u>Matters for clarification / Amendments</u></p> <ul style="list-style-type: none"> <li>• Lack of detail with the Design Code regarding private amenity space within Development Area 2.</li> <li>• Further detail required on play space provision and equipment.</li> </ul> <p><u>Conditions and Heads of Terms</u></p> <ul style="list-style-type: none"> <li>• Impact on public parks and open space – Financial Contribution of £307,586.</li> <li>• Playing pitch contribution of £30,000.</li> <li>• Community / Public Park contribution: <ul style="list-style-type: none"> <li>- Option A: Additional £52,380 – new total, £200,080 for 10-year maintenance; OR</li> <li>- Option B: Transfer of the community park land to LBRuT and a financial contribution of an additional</li> </ul> </li> </ul>

	<p>£183,400 – new total, £1,069,400 for its delivery and maintenance.</p> <ul style="list-style-type: none"> <li>• Towpath contribution - £44,265 (as previously agreed).</li> <li>• Heads of Terms as previously secured.</li> </ul>
Public realm	<ul style="list-style-type: none"> <li>• Insufficient detail: Wind impact within the public realm within Development Area 2.</li> <li>• Clarification regarding on-street parking within Development Area 2. Request this is prohibited.</li> </ul>
Residential amenity	<p><u>Objections:</u></p> <ul style="list-style-type: none"> <li>• Visual impact and privacy: Relationship with Reid Court; Parliament Mews; Leyden House, The Old Stables and Thames Bank House and Aynescombe Cottage.</li> <li>• Daylight: Boat Race House; 31 Vineyard Path; Reid Court; Parliament Mews; Thames Bank House and Cottage; 3-9 Lower Richmond Road; and Old Stables.</li> </ul> <p><u>Matters of clarification:</u></p> <ul style="list-style-type: none"> <li>• Set back of building 19 and heights.</li> <li>• Setbacks of building 20 – pages 48 and 50. These to be a ‘must’.</li> </ul>
Transport	<p><u>No objection:</u></p> <ul style="list-style-type: none"> <li>• Reduction in parking.</li> <li>• Parking bays along Williams Lane.</li> <li>• Electric vehicle charging points.</li> <li>• Impact on rail.</li> <li>• Option 1 – LBR Financial contribution scheme,</li> </ul> <p><u>Objection:</u></p> <ul style="list-style-type: none"> <li>• Options 2-5 (Chalkers Corner light, Bus Lane and Application C).</li> <li>• The Council disagrees with the applicants’ opposition to provide a returnable travel plan bond.</li> </ul> <p><u>Clarification/amendments sought:</u></p> <ul style="list-style-type: none"> <li>• Details of the 7% additional disabled parking bays – triggers.</li> <li>• Confirmation no on-street parking within the development.</li> <li>• Questionable trip generation data and total trips for the school.</li> <li>• Uplift in cycle storage for the school.</li> </ul> <p><u>Necessary S106 Heads of Terms</u></p> <ul style="list-style-type: none"> <li>• Area wide Traffic Management Contribution: £1,953,000</li> <li>• Highway Improvements Contribution: £950,000</li> </ul>

	<ul style="list-style-type: none"> <li>• Chalkers Corner Junction Contribution: £1,650,000</li> <li>• Travel Plans for both Applications A and B – with more ambitious targets for sustainable travel</li> <li>• Travel Plan monitoring - £30,000</li> <li>• Travel Plan implementation bond - £250,000</li> <li>• Travel plan target bond to cover seven / eight years – £250,000</li> <li>• Phased opening of the school</li> <li>• Bus infrastructure and contribution – uplift to meet the needs of the revised scheme</li> <li>• Controlled Parking Zone consultation and implementation -prior to occupation</li> <li>• Removal of car parking permits</li> <li>• Highway works as outlined in drawing 38262/5501/058H</li> <li>• Bus infrastructure – Section 278</li> <li>• TfL pedestrian improvement scheme on Lower Richmond Road, Mortlake Highway Street, Sheen Lane - £228,878</li> <li>• Level Crossing and Bridge: <ul style="list-style-type: none"> <li>- Additional bridge signage;</li> <li>- General improvements to the pedestrian bridge;</li> <li>- Moving bollards back on both North and South Worple Way;</li> <li>- Setting back vehicle stop lines.</li> <li>- improved surfacing of the road</li> </ul> </li> </ul>
Energy	<p>No objection, subject to uplift in the carbon offset contributions</p> <p><u>Outstanding matters:</u></p> <ul style="list-style-type: none"> <li>• Absence of a Sustainable Construction Checklist and questions regarding the calculations for the carbon offset contribution.</li> </ul> <p><u>Section 106:</u></p> <ul style="list-style-type: none"> <li>• Revised Carbon Offset Payment (and safeguards in place for potential uplifts).</li> <li>• Heads of Terms to secure further Carbon Offset Payment if the carbon savings are not met.</li> </ul>
Pollution	<p><u>Air pollution:</u></p> <ul style="list-style-type: none"> <li>• No objections, subject to conditions and uplift in S106 financial contribution towards air quality measures (£90,000) and resourcing for compliance and regulation (£60,000).</li> </ul> <p><u>Odour, Light and Noise Pollution:</u></p> <ul style="list-style-type: none"> <li>• No further comments subject to original conditions and heads of terms.</li> </ul>

Trees	<p><u>Outstanding matters:</u></p> <ul style="list-style-type: none"> <li>• Removal of street tree (part of G151) and need for CAVAT valuation to inform necessary compensation.</li> </ul> <p>No further comments, subject to original conditions and heads of terms</p>
Ecology	<p><u>Outstanding matters:</u></p> <ul style="list-style-type: none"> <li>• Need for further surveys</li> <li>• Need for net gain assessment</li> </ul>
Impact on local infrastructure	<p><u>Education</u></p> <ul style="list-style-type: none"> <li>• No objection, subject to Application B being approved.</li> </ul> <p><u>Health:</u></p> <ul style="list-style-type: none"> <li>• No objection, subject to the uplift in a financial contribution towards health services (£595,660).</li> </ul>
Waste Management	<ul style="list-style-type: none"> <li>• Site wide outstanding matter - swept path analysis for a refuse collection vehicle.</li> </ul> <p><u>Development Area 1:</u></p> <ul style="list-style-type: none"> <li>• Commercial – no objection, subject to conditions.</li> <li>• Residential - outstanding matters – contingency plan; lack of detail on basement plans and regarding bulky waste storage and food waste; insufficient refuse storage facilities in building 4;</li> <li>• Section 106 necessary for secondary collection.</li> </ul> <p><u>Development Area 2:</u></p> <ul style="list-style-type: none"> <li>• No objection subject to conditions regarding capacity, estate management, access.</li> </ul> <p><u>Circular Economy Statement:</u></p> <ul style="list-style-type: none"> <li>• A twice weekly collections and lack of details for commercial waste - adverse impact for environmental performance.</li> <li>• The Council is unable to 'liaise' with the Facilities Management Team. The collection process is based on the need for efficient collection vehicle routing; times are not provided and just fixed to specified day(s) after 6am.</li> <li>• Conditions will be necessary to ensure refuse and recycling bins are located within the collection areas on the specified days.</li> <li>• Monies in perpetuity are necessary for the second delivery within Development Area 1.</li> <li>• Lack of confirmation there is adequate space for all refuse and recycling bins plus bulky waste.</li> </ul>

	<ul style="list-style-type: none"> <li>Additional bins required for each basement store to enable occupants to continue to deposit waste in them on collection days.</li> </ul>
<b>Application B</b>	
Design	No objections raised
Landscaping/trees	No objections, subject to conditions
Highways	As discussed in 'Application A' comments
Waste	Insufficient detail regarding detailed swept path drawings, management arrangements for the shared use of the bus/servicing drop off area, and arrangement of sufficient bins to cater for the development.
<b>Application C</b>	
<p>No changes to scheme since prior consideration by Council. Objection to proposal noting the previous resolution of Council's Planning committee (20<sup>th</sup> January 2020) to refuse the application for the following reasons:</p> <p><i>"With the mitigation measures secured in applications 18/0547/FUL and 18/0548/FUL for the Stag Brewery redevelopment, such as but not limited to Travel Plans (and associated bonds) and contributions towards highway improvements, and the proposed programme of implementation for the aforementioned applications, it is deemed the adverse impacts to the highway network caused by the redevelopment can be adequately mitigated without the need for the development hereby refused. The development is thereby an inappropriate and unnecessary form of development where any benefits that the scheme may deliver is outweighed by harm:</i></p> <p>A) <u>Trees</u>: <i>The development, by reason of the proposed siting of the highway works; the subsequent loss of highly prominent trees of townscape and amenity value, and the inadequacy of the proposed planting and CAVAT contribution that are not deemed to sufficiently mitigate the harm caused by the loss of the existing trees, would represent an unacceptable form of development, that would harm the visual amenities of the streetscene, surrounding residential properties and area in general, contrary to policy, in particular policies LP 1, LP 8 and LP 16 of the Local Plan; policy 7.21 of the London Plan and the National Planning Policy Framework.</i></p> <p>B) <u>Other Open Land of Townscape Importance and Unneighbourly</u>: <i>The development, by reason of the encroachment of the public highway and footway towards and within Chertsey Court and the consequential loss of Other Open Land of Townscape Importance, which is of value by reason of its presence, green nature and openness, would represent an unacceptable and unneighbourly form of development that would harm the green openness and character of both the grounds within Chertsey Court and the kerb side adjacent, to the detriment of the visual amenities of surrounding residents, streetscene and area in general. The development would thereby be contrary to policies, in</i></p>	

*particular LP 1, LP 8 and LP 14 of the Local Plan and the National Planning Policy Framework.*

*C) Air Quality: The development, by reason of, its location within an Air Quality Management Area and Air Quality Focus Area; the proposed alterations and increase to the size of the road network; the subsequent reduction in width of the public realm; and the absence of acceptable mitigation to protect the users of the pedestrian network; would result in a poor walking environment and increase the risk of exposure to poor air quality in an area that already suffers from high levels of pollution. The development is thereby contrary to policies, in particular policies LP 10, LP 30 and LP 44 of the Local Plan, policy 7.14 of the London Plan and the National Planning Policy Framework, all of which aim to improve local environmental conditions such as air quality, minimise increased exposure to existing poor air quality, and enhance existing walking networks and people's health and wellbeing. "*

Table 2.0 – Summary of Council Comments/Objections

113 On 17<sup>th</sup> November 2020, Richmond Council provided additional comments which noted the recent closure of Hammersmith Bridge; and requested subsequent investigations and amendments to the submitted Transport Assessment, Environmental Statement and Framework Construction Management Statement.

114 On 8 March 2021, Richmond Council provided an additional written response outlining the Council's position with respect to the further consultation following the withdrawal of Application C and additional transport information which had been provided by the applicant regarding Hammersmith Bridge Closure. Whilst Council welcomed the withdrawal of Application C, the following comments and concerns were raised with respect to the additional technical notes.

- Query trip generation figures and the robustness and accuracy of the conclusions reached.
- Inappropriate traffic/parking survey data. Note lack of detail, limited data and survey area. Query the use of flawed information as representative of the wider network.
- In regards to Hammersmith Bridge the council query the robustness of survey data, note failure to detail bridge closure impacts on bus travel and distribution, note inconsistencies regarding timeframes for Bridge repairs, and perceive the assessment has an over reliance on bridge re-opening.
- Highway network impact has not been adequately considered, noting survey limitations and lack of detail on driver delays.
- Query whether predictions for public transport mode share and the submitted Travel Plan are capable of being met.
- In respect to the 4 transport mitigation options, query the underlying survey data used to inform these options. Option 2 (Chalkers Corner 'Light') is supported but uncertainty remains around predicted trip rates and mode share. Option 4 (Chalkers Corner 'light + bus lane') is not considered to meet tests set out in the NPPF and is not supported noting loss of on street parking, limited bus

improvements and reliance on a Traffic Orders Amendments which cannot be guaranteed.

- Council reiterates request the provision of a returnable Travel Plan Bond.
- Increase of path width through Mortlake Green from 4 to 6 metres is not supported and results in loss of green space.
- Query car parking allocation plan, management and electric vehicle charging infrastructure.
- Object to changes to previously agreed heads of terms regarding the Towpath.
- Require additional cycle parking infrastructure for school.
- Reiterate previous concerns regarding service provision in terms of capacity, storage and collections.

### **Statutory and Non-Statutory Consultation Responses (amended proposals)**

115 Responses received from statutory and non-statutory organisations during all three periods of consultation undertaken on the proposals by the GLA have been collectively summarised below for ease of reference.

116 Ealing Council: No comments or objections received.

117 Hammersmith and Fulham Council: No comments or objections received.

118 Wandsworth Council: No comments or objections received.

119 Hounslow Council: No comments or objections received.

120 Historic England: On the basis of the information available, Historic England do not wish to offer any comments on the revised proposals.

121 Greater London Archaeological Advisory Service (GLAAS): The revisions to the applications will not have any additional archaeological impact to that of the original scheme. The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: Mortlake and Barnes. The archaeological interest should therefore be conserved by attaching recommended informatives and conditions.

122 Port of London Authority: The Port of London Authority indicated no comment or concerns with respect to revised proposals for Application B or Application C. The following comments were provided in respect of Application A:

- The PLA provided comments to Richmond Council regarding the proposed development and worked with the applicant on the detail relating to a number of matters, including the provision of a boathouse. Provided that the amended documents do not change the position reached with the PLA on these matters then the PLA has no further comments to make.

123 Thames Water: No comments or objections received.

124 NHS England: No comments or objections received.



125 Hounslow and Richmond Community Healthcare: No comments or objections received.

126 Clinical Commissioning Group: The following comments were received from the NHS South West London CCG (Kingston and Richmond):

- The CCG previously requested a financial contribution of £465,850 towards investment in primary and community healthcare in the local area to mitigate the direct healthcare impact of the development.
- The Council's revised Planning Obligations SPD (June 2020) supports the use of the HUDU Planning Contributions Model to assess the impact of development on healthcare infrastructure and calculate developer contributions. The HUDU Model has been used to calculate the demand for additional primary healthcare infrastructure arising from the development and associated capital costs. Given the uplift in housing units a revised section 106 contribution of £595,660 to mitigate the impact of the development.

127 Environment Agency: No objection to proposals, subject to conditions which secure implementation of measures detailed in the Flood Risk Assessment and accompanying technical documents.

128 Lead Local Flood Authority: No comments or objections received.

129 National Trail: No comments or objections received.

130 Natural England: Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

131 Network Rail: No objection to the proposals, subject to the provision of agreed level crossing improvements provided at the applicant's expense. No concerns held regarding the proposals impact on Mortlake Train Station.

132 Royal Mail Group: No comments or objections.

133 Sports England: Having reviewed the submitted plans, Sport England's previous position has not changed; there is no objection to this application subject to the following considerations:

- a) Previous objections were withdrawn based on the provision of acoustic barriers to the satisfaction of the Council Environmental Health Officer, and amendments to the legal agreement to ensure that the whole of the area where the sports fields are located would not be built on until a contract has been signed with the school operator to build the school and the associated facilities.
- b) Conditions are required of any approval, in order for the proposals to meet exception 5 of Sports England's playing fields policy.
  - Details of design and layout of artificial pitch, Multi-Use-Games Area, and floodlighting to be provided and secured.

- Certification that artificial grass pitch meets FIFA Quality Concept for Football Turf (or equivalent Standard), and is registered on the Football Association's Register of Football Turf Pitches.
- Hours of operation restrictions.
- A management and maintenance scheme to be secured.
- A community use agreement to be secured.

134 British Rowing: No comments or objections.

## **Individual neighbour responses**

### *Amended Scheme*

135 Two initial periods of public consultation were conducted on scheme amendments, the first between August-September 2020 and the second in October 2020. These collectively generated responses from 1,119 individual representors. Of the comments received, 4 representations were in support of the proposals, 6 contained neutral comments, and the remaining 1,109 responders outlined their objections to the proposals.

136 The four letters of support outlined the following matters:

- Support for a public secondary school in East Sheen, this should specialise in technology.
- Development will bring benefits to the local community.
- Connecting Mortlake to the River and a new 'Riverside Heart' supported.
- Cinema, cafes, restaurants, pubs and new rowing clubs will transform the way Mortlake is enjoyed by residents.
- New secondary school will be asset to the community.
- Additional office space will bring money to the area, a boost for Mortlake.
- Riverfront location and ground floor retail space will anchor the scheme and become a place where locals enjoy spending time.
- Rowing club will connect to the river in a meaningful way.
- Mansion block style is supported on an 'island' site such as this.
- Chalkers Corner proposals will improve traffic flow through the junction.
- Support for improved affordable housing offer on the previous scheme – area has a chronic shortage of affordable housing.
- Reduction in car parking will move away from 'car-centric' development.

137 The six letters of neutral comment raised the following matters:

- Richmond Council and developers need to achieve trade-off to allow Mortlake community to be re-established.
- Archaeological history – former Archbishop's Palace which lies under brewery site.

- Several of the documents making up the planning application show that the passageway to the south of the properties on Thames Bank (e.g. Parliament Mews) which runs from Aynscombe Path to Williams Lane is not part of the brewery site or the proposed development. See for instance “Development Areas 1 and 2 Boundaries” and “18125\_C645\_MP\_P\_00\_001\_C Proposed Masterplan Ground Floor Level”. This is consistent with the inclusion of this path in the London Borough of Richmond upon Thames “Public Rights of Way: Definitive Statement, 4 July 2016” as Number 39.

138 The objections received raised the following matters:

- Removal of Trees blocking Chertsey Court from Chalkers Corner.
- Air quality impact on Chertsey Court residents from Chalkers Corner expansion.
- Question need for a school on the site.
- Query traffic and environmental impacts against backdrop of Hammersmith Bridge closure.
- Query what proposals there are for increased public transport to serve the needs of the development.
- Overdevelopment of site for financial interests of investors.
- Increased traffic from Chalkers Corner junction expansion.
- Local traffic impacts.
- Need to test a number of highway and traffic scenarios for development.
- Unacceptable height increase.
- Development out of character with local area.
- Overpopulation of local area.
- Demand for character family homes in the area, not flats.
- Poor public transport access in the area (no tube).
- Air quality impact on local area from increased traffic.
- Unacceptable scale and density.
- Impact on surrounding Conservation Areas.
- Impact on Maltings Building.
- Impact on Thames Bank Listed properties.
- Impact on Towpath.
- Harm to river frontage.
- Impact on identified Buildings of Townscape Merit.
- No mitigation to increases in traffic caused by the scheme.
- No logistics solution to early works/demolitions.
- Loss of OOLTI and sports fields.
- Overshadowing of open spaces by increased building heights.

- Secondary school site undersized (30% of DfE requirement).
- Danger of Mortlake Station level crossing.
- Inadequate rail service at Mortlake Station (4 trains an hour).
- Loss of use of existing playing fields by Thomson House Primary School.
- Flood risk to surrounding residents will be increased by the sites flood defences deflecting flooding south into Mortlake.
- Waste/construction material transfer by river is impossible due to Hammersmith Bridge closure and safety issues.
- Impact on surrounding properties in terms of privacy, overshadowing, wind and microclimate.
- Proposals fail to meet tall buildings policy.
- Architectural style and quality is not supported.
- Revised scheme still provides unacceptable levels of car parking.
- Proposals do not meet the goals of the Mortlake Brewery Community Group.
- Inappropriate process, insufficient information and timescale.
- No regard for listed trees – including removal of a ‘class A’ tree (London Plane T29).
- Segregated approach to affordable housing provision (all in western portion).
- Construction traffic impacts on surrounding area.
- Lack of local cycle infrastructure – need plans for segregated cycle lanes.
- Impact on social infrastructure (GP’s, Primary schools, nurseries, green space).
- Retail and office space is not needed.
- Carbon dioxide savings calculated from a worst-case scenario rather than from best practice.
- Poor outcomes for wildlife.
- Cycle parking provision is inadequate.
- Community de-emphasised and delivered in phase 2 only.
- Cinema is not needed.
- Development incompatible with Planning Brief vision.
- Requires review by an independent Design Review Panel.
- Flood risk/drainage assessments do not adequately consider the proposed basement.
- Traffic problems will hinder emergency services/response times.
- Increased parking pressure on surrounding areas from new residents.
- Light pollution from sports pitch floodlights.
- Inadequate social housing proposed.

- More affordable family homes needed, not flats.
- Lack of green space in the development.
- Danger of school near the river (unsupervised children close to the water).
- In-built car dependency with too many car parks provided.
- Taller buildings rely on lift access – a health hazard in the current pandemic.
- Impact on Chiswick Bridge for commuters
- Reinstatement of care home should be included in revised proposals.
- Offices should not be included in flexible uses floorspace to prevent oversupply.
- Hotel not needed.
- Lack of measures to secure affordable homes for local people
- Scheme should include light industrial units rather than offices.
- Approval process un-democratic and high-handed.
- No provision of supervised housing for vulnerable people.
- Developers should be forced to pay for the increased road traffic generated/school places required/health infrastructure upgrades but under the new proposals none of this is required.
- Proposals to increase bus services and cycle ways will further aggravate congestion unless additional road widening works etc. are conducted.
- The rowing club would be superfluous because we already have one on the other side of the river.
- Hearing/consultations should be postponed during the pandemic.
- Impact from servicing vehicles and others (ubers, taxi's, deliveries, etc).
- Query disposal of construction waste – will it just be to landfill.
- Covenants should be secured to ensure homes are lived in by owners, not left empty as a second home or rented investment property.
- Cinema should be an independent cinema allowing local residents in its programming and operation.
- Terraced housing should not be replaced by multi-storey flats.
- Development should contribute financially towards Hammersmith Bridge repair/reopening.
- The riverside location is rich with wildlife and this site will cause irreparable environmental damage and additional waste.
- Scheme doesn't address ways in which COVID pandemic has affected the way people live.
- Lack of coordination with other large developments in the area – Barnes Hospital and Homebase, Manor Road sites.
- Inadequate school parking.
- Scheme should provide a swimming pool or lido.

- Increased crime rate and anti-social behaviour.
- Alternative sites are more appropriate for the school.
- The Green Link should be returned to its original width as shown in the Indicative Master Plan of March 2017, making the riverbank visible from Mortlake Green, and creating a single connected space from Mortlake Station to the river.
- Objection to Mayor over-riding local decision of Richmond Council.
- Any application affecting the Conservation Areas should be submitted in detail and not in outline.
- Must be subject to independent design review and this has not happened.
- Water transport connections to Richmond, Hammersmith, Putney, Waterloo and the City should be included.
- Overcrowding impact on mental health and well-being.
- Inadequate school facilities and open space.
- Mortlake Green will become a crowded thoroughfare to the station.
- Re-routing of 209 and 419 bus services through the site must be provided to link with Hammersmith and Richmond transport hubs.
- Objection to particular school provider – a multi-academy trust – resulting in students attracted from outside the local area.
- No need for Rowing Club.
- Need to upgrade pedestrian linkages beyond the site.
- Park should be provided along the river front for the wider community
- Internal living spaces/bedroom areas are inadequate.
- Need to secure community space and financial contributions towards its fit out.
- Lack of suitable crossing into site from Mortlake Green.
- Land removal from Chertsey Court for road widening is unacceptable.
- Need more public toilets.
- Bat, swift and swallow boxes must be included.
- Should utilise heat-bore pipes instead of reliance on gas.
- Increased renewable energy should be incorporated.
- A Police Station is needed for the area.
- Residents would be better incorporated into the local area of public spaces and facilities in East Sheen.
- 5,000 sq.m is dedicated to private parking which could be used for sustainable transport hubs instead.
- Lack of community stakeholder engagement by the developer.
- Fire safety concerns of buildings post Grenfell Tower.
- Fails to activate and support Mortlake High Street.

- Loss of Cricket on the existing playing fields.

### *Further Transport Consultation*

139 A third period of public consultation on the proposals was undertaken between February and March 2021, with respect to the withdrawal of Application C and additional transport information which had been provided. This consultation generated responses from 631 individual representors. Of the comments received 1 representation was in support of the proposals, and the remaining responses outlined objections to the proposals.

140 The letter of support outlined the following matters:

- Green link to river is supported.
- Chalkers Corner Bus Lane Option is supported.
- ‘Car Lite’ nature of the scheme is supported.

141 The objections raised the following matters:

- Option 4 (including Bus lane) unjustified as bus user figures are overstated.
- Suggest underground road option for Lower Richmond Road
- Suggest all parking on Lower Richmond Road be removed and it made a dual carriageway, with increased in-development parking for displaced residents parking.
- Not enough space provided for the school.
- Towpath should be hardstanding so it is usable in the wet.
- No provision for a rowing facility.
- Works should not occur while hammersmith bridge is closed.
- Proposed road layout is not cycle friendly.
- Resident bike parking is a ‘minimum standard’ and should be improved.
- Chalkers corner junction unlikely to be improved through works.
- Construction traffic impacts.
- Upgrades to Sheen Lane and Mortlake Station are inadequate.
- Increased housing density unjustified and will cause traffic impacts on surrounding area.
- Will contribute to a pollution hotspot with subsequent health impacts.
- Data showing no/low impact from Hammersmith Bridge closure is flawed – collected during pandemic where traffic flows are drastically reduced.
- Short re-consultation period inadequate for development of this scale.
- All homes should have their own car parking spaces.
- Size and scale of development excessive.
- Nothing to address existing drainage problems with the site.

- Nothing to meet emissions targets for the area.
- Proposal results in overcrowding.
- Inadequate green space.
- Journeys beyond Richmond or Chiswick require private transport – need to be wider survey and discussions about how this can be discouraged/prevented.
- Chalkers Corner is not the only traffic bottleneck which needs addressing.
- New housing should be first developed in now empty office buildings in central London.
- Owner occupancy of these types of development is low.
- Proposal is being rushed through before the Mayor's Term Ends.
- Not a sufficient capacity for existing shops, facilities, doctors, etc to cater for influx of new residents.
- Combined impact of population increases with Homebase Manor Road Development.
- Need to increase number of trains per hour to combat increased population demands.

### **Community Groups, MPs and Other Organisations**

142 In addition to the individual neighbour representations, representations were received from the following local Community Groups, MPs and other organisations during the three consultation periods on the amended proposals and additional transport information. The matters raised in these representations are collectively summarised as follows:

143 Sarah Olney – Richmond Park MP – Impact of Hammersmith Bridge Closure. Impacts on local infrastructure from increased number of homes on the site. Unacceptable building height. Impact on historic environment. Safety of Sheen Lane level crossing. Impact on local road network. Impact of increase traffic from Chalkers Corner junction works. Impact on air quality. Need to utilise the Thames for transport construction waste and materials. Harm outweighs benefits - breaches of NPPF, London Plan and Richmond Council's Local Plan.

144 Mortlake Brewery Community Group – Detailed concerns regarding building heights, massing, density, impact on heritage assets and conservation areas, the submitted energy strategy, lack of demand for secondary school, impact of basement carpark and flood defences on surrounding areas flood resilience, Impact of Hammersmith Bridge closure.

145 Mortlake with East Sheen Society – Proposed number of homes is double that of the planning brief (560 homes), no need for secondary school on the site, loss of OOLTI land and playing fields, impact on road transport network, no new bus services proposed to support school, impact of Hammersmith Bridge closure, waste and construction material needs to be transported via the Thames, Chalkers Corner proposals worsen air quality and environment and require mature tree removal.



146 Head Teacher - Thomson House School – Objection to Application A on grounds of traffic impacts, including existing over-stressed level crossings. Air quality impacts from new/additional traffic. Objection to Application B on grounds that requirement for a new school is based on outdated data and flawed statistics. No demonstrated need for a secondary school in the borough. Objection to Application C on grounds that the plans do not address traffic concerns at the Sheen Lane level crossing and may exacerbate safety concerns. Transport Assessment does not account for future scenarios of Hammersmith Bridge, or the impact of the nearby Homebase development on Manor Road.

147 Board of Governors – Thompson House School – Objection to Application A on grounds of traffic impacts, including existing over-stressed level crossings. Air quality impacts from new/additional traffic. Objection to Application B on grounds that requirement for a new school is based on outdated data and flawed statistics. No demonstrated need for a secondary school in the borough. Objection to Application C on grounds that the plans do not address traffic concerns at the sheen land level crossing and may exacerbate safety concerns. Transport Assessment does not account for future scenarios of Hammersmith Bridge, or the impact of the nearby Homebase development on Manor Road.

148 Headteacher of Richmond Park Academy – Object to new secondary school. Flawed data relied on to justify school requirement. Existing un-used capacity in sixth form of surrounding schools will be exacerbated.

149 Mortlake Community Association – Development size is overbearing to conciliate developers unrealistic profit targets whilst exceeding affordable housing quotas. The planned buildings are close to each other and high. There will be little light and no feeling of space on the development, and the design of the buildings is overbearing. Exceeds acceptable density range and will increase Mortlake population by circa 90%. Development must be a post-covid project which includes the Community Centre as focus, provides health facilities, reinstates the care home, provides sustainable active travel, environmentally acceptable footprint, fewer offices (allowing reductions in height) and removal of the cinema. Loss of playing field and new secondary school not supported. Pleased that the developer supports a community centre in Building 5, although at present this is not reflected in the plans. This must be noted and changed. Requested that this building is included in phase one. Obligation upon the developer to openly offer the area defined in building B5 to the community only reverting to commercial if no sustainable community option is available must be secured in s106.

150 Thames Bank Residents Association (TBRA) – The revised proposals bear no resemblance to the original plans in terms of density and scale. Community concerned by the impact on local infrastructure, transport, air quality, as well as the impact on important listed buildings and the Mortlake Conservation Area. Support alternative plans which better balance the Mayor's objectives to deliver more affordable housing with ensuring a sustainable development for the local area. In response to transport consultation TBRA consider that proposals are totally inadequate; the impact of Hammersmith Bridge closure is underestimated; assumptions, modelling and surveys are flawed; Sheen Lane Level Crossing is inadequately dealt with; and there is no mention of timing for traffic mitigation works.

151 Mums for Lungs, East Sheen Group – Concerns raised regarding air quality and traffic congestion caused by the development. Development should be 'car-free'.

152 Towpath Group – Fear for the future of the wooded Towpath and green corridor which provide a link between ‘developed’ London and the gateway to the Arcadian Thames and World Heritage Site at Kew Gardens. Density of development threatens the environment and the ecology of both the Towpath and the River. Impact of light pollution on the habitat and ecology. Urbanisation of the Towpath detrimental to mental and physical health. Work to the eastern section would necessitate using the Towpath to access work on the site. The Towpath would be closed for an indeterminate length of time between Ship Lane and Bull’s Alley at the minimum.

153 The Labour Party – Richmond Park Constituency – Welcomes new quota for affordable housing and delivery of affordable housing in first phases of development. However, objects to development on grounds of density and impact on transport infrastructure. Little opportunity for expansion in rail travel, tube stations are far away and buses limited. There are no plans, or space for a bus hub within the development. Road widening scheme at Chalker’s Corner could lead to increased traffic taking that route, and it would also further encroach on green space by taking much of the garden from the residents of Chertsey Court. Letting the field remain, and not building the school will go some way towards relieving the population density. Additional comments provided in response to transport consultation reiterated concerns regarding the impact of density on the local traffic network; minimal transport alternatives; safety of Sheen Lane Level Crossing; uncertainty surrounding Hammersmith Bridge; and outlined support for alternative proposals put forward by the Mortlake Brewery Community Group.

154 The Richmond Society – Although the Stag Brewery is physically outside the Society’s area of benefit, we are alarmed that the repercussions of such a large development extend far beyond Mortlake and will bring harm to the amenity of Richmond’s residents. Incremental harm caused by this and other major developments (including Homebase, Manor Road). Density exceeds central London guidelines, yet accessibility is poor with traffic congestion and poor public transport access. CIL and S106 contributions unlikely to make meaningful improvements to repercussions of development. Need for an integrated Travel Plan with surrounding areas. Previously planned cycle improvements have not materialised.

155 Parliament Mews Residents Association – Objection to development on grounds of scale and density proposed, excessive heights of buildings behind Thames Bank properties (should be capped at 3 stories), Secondary School site is too small, traffic is currently gridlocked & this has been exacerbated with the Hammersmith Bridge closure and blocking of Richmond Park traffic, no consideration of logistics planning. Plans should be scaled back to 2011 community plan for the site.

156 The Kew Society – The development now proposed would be overbearing, visually intrusive, totally out of keeping with the surrounding built environment, statutorily listed buildings on Thames Bank and the surrounding conservation areas. It would cripple the local infrastructure and cause safety issues due to the lack of a credible plan to address the high volume of road and rail journeys to and from the site. Objection to Application C (Chalkers Corner). The proposal would impact air quality in Kew via linked traffic routes (South Circular and Kew Road). Whole area surrounding Brewery site and Chalkers corner is currently close to the legal limits for air quality.

157 Chertsey Court Action Group (CCAG) – Petition Signed by 76 Signatories strongly opposing the former Stag Brewery Site Redevelopment (Revised Plans) 2020

Ref/GLA/4127. Chertsey Court is in an unprecedented position within the borough. Chalkers Corner is the only West London Intersection; where the North Circular meets the South Circular as well as crosses the A316. Traffic, noise and air pollution are already unbearable at this junction and have worsened since the latest closure of Hammersmith Bridge. Access to the Brewery site is limited due to the constraints by the River and Mortlake Railway Crossing. Access to this site is by one Road only; and we live on it. We are inviting Mr Sadiq Khan to visit this unique site to see first-hand as to why the applications would be impossible. In response to later transport consultation following the withdrawal of Application C, CCAG submitted further comments welcoming the withdrawal of Application C but reiterating a number of remaining concerns. Concerns raised include impact from an additional 437 residential dwellings on the site; continued reliance on a single route for access/egress causing gridlock on Lower Richmond Road and Mortlake High Street; incomplete transport information; unrepresentative parking surveys; no consideration of tidal impact on parking spaces; unsubstantiated assumptions about repairs to Hammersmith Bridge; bottleneck/safety issues at Mortlake Level Crossing; problems with emergency service vehicle access.

158 Richmond Cycling Campaign - The Brewery development is an amazing opportunity to properly implement policies on low car ownership/use, higher rates of walking, cycling and public transport, better quality, addressing the climate emergency within an area which is blighted both by short car journeys that can be made by other modes, and by large volumes of through traffic. Development should be rejected until it provides a Chalkers Corner design which reduces motor traffic volumes, Road plans which reduce pollution by taking away multi-lane routes, Chalkers Corner/train crossings/A205 junctions which include safe, separated cycling infrastructure, a travel plan which supports a majority of children arriving at school by walking or cycling, the removal of car parking in the development (save for essential services and car clubs), funding to support full traffic consultations and fulfilment (i.e. construction and delivery) of Low Traffic Neighbourhoods in the surrounding area.

159 West London River Group – The redevelopment of the site presents great opportunity to re-establish a focal point in Mortlake and create a vista through to the River Thames between Kew and Chelsea. However, concerns are held regarding the scale and density of the proposals, incompatibility with the surrounding area, impact on the Maltings Building, overshadowing and impacts on the towpath environment, impacts on traffic issues in the local area, impacts on air quality, and impacts on daylight/sunlight/overshadowing and light pollution. Spoil and waste from the site should be transported via the river instead of the local road network.

160 Williams Lane and Wadham Mews Residents Group – Amendments present no positive substantive changes and previous objections therefore remain. Over-dense development and scale in excess of the APB requirements, significant loss of daylight and loss of OOLTI protected green space. No need or support for secondary school. Impact on air quality, loss of sunlight and privacy to adjacent residences, segregation of social housing into western portion of site, traffic impacts (existing and exacerbated by development). North Western portion of site in particular is too dense, and Williams Lane portion of the site should include three storey houses as previously proposed. A CPZ is required in Williams Lane. A Transport Plan involving integration with the surrounding area is required. Planning conditions should include a 10 year restriction on disposal of all or part of the site. Objection to construction phase disruption. Viability data must be scrutinised, including contingencies for Covid and Brexit.

161 Barnes and Mortlake History Society – It is important that redevelopment of the Brewery site reflects Mortlake's heritage, preserving key features and reflecting historic character. The density of the scheme is too great with limited public transport provision. Transport improvements are constrained by the physical aspects of the site. Building heights are not in keeping with a site surrounded by conservation areas, historic buildings and the towpath. The loss of the historic sports field is not supported. Little is provided in the way of a new Community Centre.

162 Barnes Community Association - The developer has ignored the principal objection – the cumulative density of the scheme – by now increasing this even further to a totally unsustainable level. The scheme is unsustainable in scale and density, building heights are unacceptable given the context, surrounding Conservation areas and adopted SPG, there is no mitigation of traffic impacts of the scheme, little consideration of existing danger of Mortlake Station Level Crossing, OOLTI sports field loss is not supported, design is unimaginative, removal of materials during construction should not occur through Barnes Village. We would like to note the association's remit to safeguard the area's environment, we understand and accept the site should be redeveloped and not left derelict. We think the communities around the site can benefit hugely from the new lease of life it will receive, but this should be done carefully and without losing sight of the limitations of the location and the wish of the locals who already live in the area.

163 North Richmond Ward Councillors (LBRUT Cllrs Richard Warren, Nancy Baldwin, Richard Pyne) – Object to increased height, scale and mass of the development in breach of Stag Brewery Planning Brief SPG and policies of the NPPF. Development is not compatible with protecting the local conservation areas and non-designated heritage assets in a suburban neighbourhood. Increased population and vehicle presence will place increased pressure on the already busy Chalkers Corner, Sheen Lane level crossing, the road network generally and platforms at Mortlake station during rush hour. Widening Chalkers Corner will bring a polluted, busy thoroughfare closer to people's homes, which runs contrary to the ambitions of NPPF section 9 and the Mayor of London's Healthy Streets initiative. Also, there is no certainty that the proposed semi-mature replacement trees outside Chertsey Court will remove carbon from the air to the same degree as the existing mature trees and that they'll survive being planted there. Most of these vehicles are unlikely to be electric, so higher rates of air pollution are inevitable. During the construction phase, the river ought to be used for transporting waste and materials to and from the site, rather than roads, so as not to worsen air pollution and traffic congestion further. In response to further transport consultation Councillors raised concern regarding the limited impact of a bus lane being proposed on Lower Richmond Road, and a view that such benefit does not justify the impacts of losing 36 parking spaces for existing residents.

164 Cllr Julia Cambridge – East Sheen Ward (LBRUT) – Encouraged to see an emphasis on affordable housing and increase to 30% provision, and welcome reduction in car parking provision. However, concerns regarding displacement of vehicles on already stretched surrounding areas. Concerns of many East Sheen residents that the scheme represents overdevelopment. Object to application A on the grounds there are inadequate environmentally friendly means to construct the scheme, pressure on road network and Mortlake Station, density and height breach the LBRUT Local Plan as well as London Plan and NPPF. Object to Application C on grounds that reconfiguration of Chalkers corner as proposed would compromise air quality of existing Chertsey Court

Residents, promote further traffic and pollution, and remove trees. Reinforce reasons for refusal of Application C by LBRUT Planning Committee.

165 London Playing Fields Foundation - The grass pitches provide valuable playing fields for children in the London Borough of Richmond. We believe that the potential loss of two grass pitches and the option to play cricket at the site will have a serious impact on opportunities for sports participation in South West London without a clear indication of re-provision. In this context the council have contravened both national and regional policy.

166 London Living Streets – Objects to developments. Should be car free and only disabled and car-club parking. Proposed 5,000 sq.m dedicated to private parking should be used for sustainable transport hubs instead. LBRUT’s ability to meet ‘healthy streets’ targets will be severely affected. Low traffic neighbourhood should be introduced.

167 Caroline Russell, Greater London Assembly Member – Objection to developments. Lack of affordable housing and wrong tenure mix, loss of green space, unacceptable parking provision.

168 Campaign for the Protection of Rural England (CPRE) – Objection to development on grounds of loss of historic green space, negative impact on ability to meet Mayor’s Transport Strategy Targets, excessive parking, need to improve walking and cycling infrastructure.

169 Cllr Gemma Curran (LBRUT, Mortlake and Barnes Common) – Objects to developments noting lack of infrastructure, impact on surrounding road network and closure of Hammersmith Bridge. Unsustainable density and scale, building heights unacceptable with surrounding Conservation Areas and adopted SPG, impact on Maltings Building, overbearing on towpath. Reduction in car parking supported but no mitigation of traffic. Lack of road and cycle infrastructure, poor air quality outcomes, sever impact on Chertsey Court residents. Loss of OOLTI sports field not supported. Mortlake Station danger increased. S106 mitigation inadequate.

170 Cllr Paul Avon (LBRUT, Mortlake and Barnes Common) – Objection to Application A noting existing traffic problems in the area, safety of Mortlake Level Crossing, poor public transport accessibility, impact of Hammersmith Bridge closure and cumulative effect of increased population with Homebase and Barnes Hospital developments. Objection to Application C noting short lived traffic benefits, impact on Chertsey Court residents, loss of prominent trees and OOLTI land, poor air quality outcomes, inadequate mitigation for the densities of development proposed. Further comments provided in response to further transport consultation outline concerns regarding parking survey data and train frequency assumptions; inadequate safety improvement at Mortlake Level Crossing; unjustified bus lane on Lower Richmond Road; as well as the scale and density of proposals.

171 Lord Norman Warner – Support for redevelopment of the site, and any proposal to increase assisted living and residential accommodation on the site. Objects to proposals noting issues with movement of people on and off the site, local traffic problems, air pollution impacts, impact of Hammersmith Bridge closure, impact of Covid on living/working arrangements.

172 The Georgian Society – Whilst the group does not object to the principle of redeveloping the former Stag Brewery Site. The current scheme would cause considerable harm to the setting and therefore the significance of designated heritage assets within Mortlake Conservation Area, being the five Grade II listed properties on Thames Bank.

173 Aspirations Academies Trust – The Trust has been selected by the Department for Education (DfE) to operate the proposed new secondary school. The trust has a proven track record of delivering high-quality education. 12 of our 15 academies have been inspected by Ofsted as Aspirations Academies with 92% graded as good or outstanding. It has been clearly demonstrated that there is basic need for secondary school places in this part of Richmond. This school will make a significant contribution towards meeting the shortfall of secondary school places in the borough. The DfE and the trust have also been closely involved in the design process to ensure that the proposed school meets our requirements. The need for school places has strong planning policy support in the London Plan, NPPF and the Joint ministerial Statement: Planning For Schools Development and the Richmond Local Plan.

### **Additional Representations**

174 Since the conclusion of the final public consultation period on 8 March 2020, and for the period up to 5 July 2021, 191 individuals or organisations have submitted additional correspondence on the proposals. Matters raised in in this correspondence is consistent with that summarised above, or related to the logistics of the representation hearing. Any further representations received prior to the representation hearing will be summarised in a further addendum.

### **Representations summary**

175 All representations received in respect of the Applications have been made available to the Mayor; however, in the interests of conciseness and for ease of reference, the issues raised have been summarised as detailed above. The key issues raised by the consultation responses, and the various other representations received, are addressed under the relevant topic headings within this report, and, where appropriate, through the proposed planning conditions and planning obligations outlined in the recommendation section of this report.

### **Environmental Impact Assessment**

176 Planning applications for development that are covered by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 are termed “EIA applications”. The requirement for an EIA is based on the likelihood of environmental effects arising from the development. The proposed development is considered to comprise Schedule 2 development likely to have significant effects on the environment by virtue of factors such as nature, size or location. Consequently, the applications are considered to form an Application for EIA and it has been necessary that an Environmental Statement (ES) be prepared in accordance with EIA Regulations.

177 An Environmental Statement was submitted in support of the original planning applications (dated 2018), with the following topics assessed:

- Chapter 7: Socio-Economics

- Chapter 8: Transport and Access
- Chapter 9: Noise and Vibration
- Chapter 10: Air Quality
- Chapter 11: Ground Conditions and Contamination
- Chapter 12: Surface Water Drainage and Flood Risk
- Chapter 13: Ecology
- Chapter 14: Archaeology
- Chapter 15: Built Heritage
- Chapter 16: Townscape and Visual Assessment
- Chapter 17: Wind Microclimate
- Chapter 18: Daylight, Sunlight, Overshadowing and Light Pollution

178 In July 2020, a revised scheme was submitted by the applicant for the Mayor's consideration. A revised Environmental Statement Addendum (July 2020) was submitted, alongside these amendments.

179 In September 2020, further minor amendments were submitted, which were accompanied by an additional Environmental Statement Addendum (September 2020).

180 GLA officers consider the scope and content of the applicant's ES and ES Addendums to be acceptable.

## **Principal planning issues**

181 Having regard to the site and the details of the proposed development, relevant planning policy at the local, regional and national levels; and, the consultation responses and representations received, the principal planning issues raised by the applications that the Mayor must consider are:

- Land use principles; including Good Growth and masterplanning; industrial land; agent of change; education facilities; playing fields; employment and training; housing delivery; town centres; social infrastructure and neighbouring sites;
- Housing; including affordable housing; housing mix and tenure; and play space;
- Urban design; including design scrutiny; site layout; height, massing, townscape and views; architecture and materials; historic environment; density; residential quality, including impacts on neighbouring properties (relationship to neighbouring uses, internal space standards; aspect; external amenity; privacy, outlook and sense of enclosure; daylight, sunlight, and overshadowing; noise and vibration; and air quality); fire safety; designing out crime; and inclusive design;
- Transport; including trip generation and mode split; mitigating impact on the highway network; public transport capacity and mitigation; active travel; Healthy Streets; car and cycle parking; deliveries and servicing; construction; travel planning; and infrastructure and transport operations protection.
- Environment and climate change; including energy (minimising of carbon emissions in development and energy efficient design); flood risk, sustainable drainage and water efficiency; BREEAM; urban greening, waterways and biodiversity; waste; and contaminated land; and
- Mitigating the impact of development through necessary planning obligations.

182 These issues are considered within the following sections of the report.

## **Land use principles**

### Good Growth and Masterplanning

183 The NPPF has three overarching objectives within the aim to promote sustainable development; economic, social, and environmental. The Mayor's overarching objective is to meet London's housing and development need by making the best use of land, whilst safeguarding the Green Belt and designated open spaces. This is reflected in the London Plan 2021 objectives on 'Good Growth' GG1, GG2, GG3, GG4, GG5, and GG6, which support intensified, high-density, mixed-use and mixed housing tenure places, particularly on sites well connected by existing or future public transport, walking and cycling connections; development on brownfield land, particularly in Opportunity Areas and on surplus public sector land; promotes industrial and employment space in the right locations; and new and improved green infrastructure.

### Loss of Industrial Site and Response to Site Allocation

184 The application site is not subject to any strategic land use designations in the London Plan 2021. Notwithstanding this, the former use of the site as an industrial brewery and the nature of existing building stock on the main application site, result in the site being considered as a 'non-designated industrial site' in the context of Policies E4 and E7 of the London Plan 2021. Policy E7C supports the mixed-use or residential redevelopment of non-designated industrial sites where they have been allocated as such in development plan documents.

185 Chapter 12 of the Richmond Local Plan identifies key sites within the borough to be developed in support of the spatial strategy of the Local Plan; ensuring sufficient land for employment, retail, housing and infrastructure. Site Allocation SA 24 'Stag Brewery, Lower Richmond Road, Mortlake' covers the whole of the application site and provides support for the comprehensive redevelopment of the site with a mix of land uses to deliver a new 'village heart' for Mortlake. Envisioned land uses for the site include a new 6-form entry secondary school, plus sixth form; in addition to housing, employment, health, community and social infrastructure uses. Sports and leisure uses, including river related uses and the retention and upgrade of the existing playing fields, are also required of any redevelopment. In addition, high quality public open spaces and public realm should be provided, particularly to provide linkages between publicly accessible green space and the river frontage.

186 Furthermore, preceding the current Site Allocation, redevelopment of the application site was the subject of Richmond Council's 'Stag Brewery, Mortlake, SW14, Planning Brief SPD' adopted in July 2011 which remains extant. The planning brief outlines the Council's Vision for redevelopment of the site with a mixture of land uses incorporating residential and commercial uses whilst establishing a new 'village heart' for Mortlake.



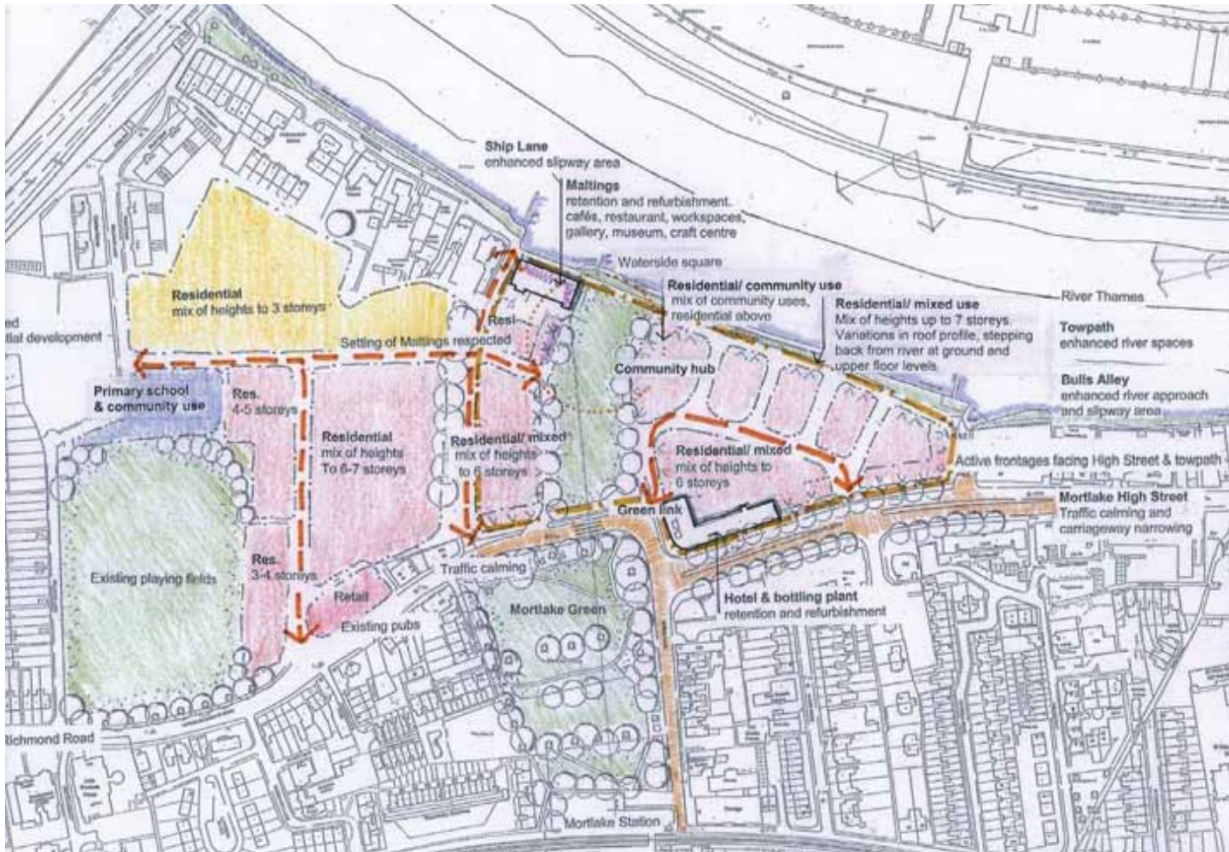


Figure 1.0 – Site masterplan from ‘Stag Brewery, Mortlake, SW14, Planning Brief SPD’ (July 2011)

187 As such, Richmond Council’s local policies identify the site within a mixed-use redevelopment area for the provision of new housing, employment, health, community, social infrastructure and education facilities. These requirements are reflected in the Site Allocation and the Planning Brief SPD.

188 On the above basis, the use of non-designated industrial land for the proposed mixed-uses without the provision of replacement industrial capacity, is in line with a Local Plan Site Allocation and other policies. Specifically Policy E7C(2) of the London Plan 2021, which supports mixed use developments on non-designated industrial sites which have been allocated for mixed use in a development plan.

189 Turning to the land use requirements of the Site Allocation, the proposals provide the following mix of land uses as part of a residential-led mixed-use redevelopment of the site.

Use	Original Scheme sq.m.	Revised Scheme sq.m.
Flexible use	4,686	<b>5,023</b>
Office	2,424	<b>5,523</b>
Gym	740	<b>0</b>
Cinema	2,120	<b>1,606</b>
Hotel	1,673	<b>1,765</b>
Total	11,643	<b>13,917</b>

Table 3.0 – Land use mix

190 Areas designated for flexible use are proposed with the following maximum and minimum areas, within the overall floorspace cap of 5,023 sq.m.

<b>Use Class</b>	<b>Minimum sq.m. (GIA)</b>	<b>Maximum sq.m. (GIA)</b>
Class A1	0	2,200
Class A2	0	220
Class A3	0	2,400
Class A4	0	1,800
Class B1	2,000	2,200
Class D1	0	1,300
Sui Generis (boathouse)	0	380

Table 4.0 – Floorspace caps

191 Whilst the specific policy implications of each use are discussed in the following report sections, the overall mix of uses proposed is considered to be consistent with the objectives of the Site Allocation to create a new ‘Village Heart’ for Mortlake. It is noted that the Council raise no concerns with the uses proposed, including the increase in B1 office floorspace, 10% of which would be delivered as affordable workspace for local SMEs.

192 The following conditions are recommended to ensure that an appropriate mix of town centre uses is maintained and controlled, noting the recent change to the Use Classes Order:

- Restriction to change of use for commercial units –no change of use shall be carried out to the Class E uses hereby approved, without the prior written consent from the Local Planning Authority.
- Retail (Class E) – Unless otherwise agreed in writing by the Local Planning Authority, no retail shop unit shall exceed 568 sq.m. or be amalgamated with another shop and exceed this area cap without prior written approval of the Local Planning Authority.
- Flexible uses – Unless otherwise agreed in writing by the Local Planning Authority, no less than 5,523 sq.m of flexible space shall be provided in Development Area 1 (detailed). Flexible floorspace must be in accordance with the following maximum and minimum floor space provisions to the flexible use units, unless otherwise agreed in writing.

<b>Use Class</b>	<b>Minimum Floor Space GIA (SQ.M.)</b>	<b>Maximum Floorspace GIA (SQ.M.)</b>

Retail (Class E)	-	2,200
Financial and Professional Services (Class E)	-	220
Cafés/Restaurants (Class E)	-	2,400
Drinking Establishments (Sui Generis)	-	1,800
Offices (Class E)	2,000	2,200
Community (Class F2)	-	1,300
Boathouse (Sui Generis)	-	380

- High Street Zone – Unless otherwise agreed in writing by the Local Planning Authority, no less than 2,260 sq.m. of flexible use space shall be provided in the High Street Zone identified on the approved drawings. No less than 50% of this space shall be used other than as retail (Class E).
- Hotel Use – Unless otherwise agreed in writing by the Local Planning Authority, the Hotel in Building 5 shall be used solely for the purposes of a Hotel (C1 use), and not for any other C1 land use.

### Housing Delivery

193 The NPPF sets out the priority to deliver a sufficient supply of new homes and states that planning policies and decisions should seek to make effective use of land and support the redevelopment of under-utilised land and buildings. In line with paragraph 118 of the NPPF, substantial weight should be given to the value of developing brownfield land in meeting housing need.

194 As outlined in the GLA Stage 2 Report (GLA/4172, 4172a & 4172b/02), it is evident that the delivery of London-wide housing and affordable housing is below the London Plan targets, as detailed in the below table showing the most recent years for which data is available.

Total supply	FY2016-2017	FY2017-2018	FY2018-2019	Total	Delivery
Homes Target	42,389	42,389	42,389	127,167	85 % of target
<b>Homes delivered</b>	<b>40,674</b>	<b>31,543</b>	<b>36,161</b>	<b>108,378</b>	
Affordable homes target	17,000	17,000	17,000	51,000	35% of target
<b>Affordable homes delivered</b>	<b>6,827</b>	<b>4,431</b>	<b>6,648</b>	<b>17,906</b>	

Table 5.0 – Delivery against pan-London housing and affordable housing targets (source: London Datahub).

\* Note: Figures previously quoted in the Stage 2 Report (GLA/4172, 4172a & 4172b) utilised data from the London Development Database (LDD), which has now been superseded by the London Datahub. London Datahub now calculates housing completions based on commencement date rather than completion date as previously used in the LDD. Datahub figures represent the most recent data available.

195 Policy H1 and Table 4.1 of the London Plan sets Richmond Council a ten year target for net housing completions (2019/20-2028/29) of 4,110 units, which represents an increase when compared to 3,150 units (i.e. 315 per year) between 2015 and 2025 as required in the previous iteration of the London Plan (2016). Policy LP34 of the Richmond Local Plan sets a local target of 3,150 homes to be delivered for the period 2015-2025, noting this target will be reviewed in line with the targets of the London Plan 2021.

196 The performance of Richmond Council against borough level targets for housing and affordable housing over the previous three years, for which the most recent data is available, is summarised in the following table:

Total supply	FY2016-2017	FY2017-2018	FY2018-2019	Total	Delivery
Homes Target	315	315	315	945	134% of target
<b>Homes delivered</b>	<b>469</b>	<b>381</b>	<b>419</b>	<b>1,269</b>	
Affordable homes target	158	158	158	474	37% of target
<b>Affordable homes delivered</b>	<b>62</b>	<b>41</b>	<b>70</b>	<b>173</b>	

Table 6.0 – Richmond Council delivery against housing and affordable housing targets (source: London Datahub).

\* Note: Figures previously quoted in the Stage 2 Report (GLA/4172, 4172a & 4172b) utilised data from the London Development Database (LDD), which has now been superseded by the London Datahub. London Datahub now calculates housing completions based on commencement date rather than completion date as previously used in the LDD. Datahub figures represent the most recent data available.

197 The above tables demonstrate that Richmond Council is under-performing in terms of the delivery of affordable homes, when considered against the targets in the 2016 London Plan. The Council has however been meeting London Plan targets for overall housing delivery and it is also noted that if the rate of delivery continues the 2021 London Plan targets would also be met, although it should be noted that there is a clear expectation that targets are exceeded. This is most notable in respect of affordable housing, with only 14% of new homes being affordable on average over the previous three-year period.

198 Richmond Council in its comments on the amended applications consider that there has not been recent under-delivery of overall housing in the Borough and has submitted a Housing Interim Position Statement with accompanying data, although it is noted that this is dated September 2020. The Council does not appear to dispute the affordable housing figures in the tables above. It should be noted that GLA officers have taken the above figures from the London Datahub, which does not currently hold robust data for the financial year 2019-20.

199 It is recognised that the Council has passed the 2019 Housing Delivery Test and can demonstrate a 5-year housing land supply (5YHLS).

200 Notwithstanding how housing delivery and/or land supply are measured, the Council does not appear to contest that there has been a consistent under-delivery across London. Given that London is a single housing market, and in the absence of robust evidence of reduced post-pandemic housing need in London, GLA officers consider that the significant weight should be given to housing delivery in this case, whether or not the Council itself is meeting its housing targets or is able to demonstrate a five year supply of housing.

201 To meet housing targets, Policy H1 of the London Plan 2021 requires optimised housing delivery on brownfield sites and on industrial sites that have been identified for release.

202 As directed by the NPPF, substantial weight should be given to the value of developing brownfield land in meeting housing need. The proposed scheme (as amended) would provide 1,250 new homes, 356 of which would be affordable (30% by habitable room, 28% by unit). This would equate to approximately 30% of the Council's London Plan target. As discussed under 'Affordable housing' below, the affordable housing provision has been considered through the 'viability tested route' since it is below the threshold for former industrial sites, and has been confirmed as the maximum quantum that can viably be delivered.

203 The proposals are in accordance with the NPPF in respect of the delivery of housing and affordable housing, London Plan Policy H1; and Richmond Local Plan Policy LP34. The proposals would contribute significantly to the London Plan housing and affordable housing targets, and Richmond's annual housing and affordable housing delivery targets. The delivery of new market and affordable housing is strongly supported on the site and should be given significant weight in the determination of this application.

### Specialist older persons housing (removed):

204 The July 2020 scheme amendments removed the previously proposed 150 flexible assisted living/residential units and an 80 bed nursing home.

205 Policy H13 of the London Plan 2021 supports the delivery of sites suitable for specialist older persons housing in instances where consideration has been given to local housing needs, and such sites benefit from good connectivity and access to relevant facilities (social infrastructure, health care, public transport). Table 4.3 of the London Plan identifies a borough benchmark of delivering 155 specialist older persons housing units annually within the London Borough of Richmond between 2019 and 2029.

206 Policy LP 37 of the Richmond Local Plan similarly supports residential care homes, nursing homes and extra care housing (as well as other housing types) where new accommodation is provided to satisfy an identified local need, and developed in locations which are suitable for the intended use. In support of LP37, the Council's related housing strategies do not identify any local need for additional care home capacity, and only a limited need for additional extra care / assisted living units (81-145 additional units to 2020).

207 Noting recent approval of alternative extra care facilities within the Richmond Council Area, including 89 units recently approved at the Kew Biothane Site (LBRUT Ref: 18/3310/FUL), it is not considered that the previously proposed extra care residential units and care home would respond to a locally identified need or be required to meet the borough-wide benchmark targets identified in London Plan Policy H13. The Council does not raise an objection to the removal of these components of the previous scheme. As such, the removal of these elements from the proposals is considered acceptable.

### Town Centre Uses, Employment and Social Infrastructure–

#### *Policy Context*

208 The NPPF states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. In line with paragraph 80, significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 86 identifies that main town centre uses should be located in town centres. Chapter 8 supports healthy, inclusive and safe places, including social infrastructure provision.

209 London Plan 2021 Policy SD7 promotes a town centres first approach for town centre uses, including social infrastructure. Policy SD6 promotes the important role of High Streets in terms of local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange. Policies S1, S2, S3 and S5, seek to protect and enhance social infrastructure provision. Policy S3 supports extended or multiple use of educational facilities for community or recreational use.

210 Policy LP 25 of the Richmond Local Plan outlines the borough's centres hierarchy and stipulates that major developments and/or developments which generate high levels of trips should be located within a Main Centre Boundary or elsewhere within the defined

Area of Mixed Use. The table provided at paragraph 7.1.13 of the Richmond Local Plan outlines the vision and approach for local centres, parades and Areas Of Mixed Use (AMUs), and denotes the application site as being situated within the 'Mortlake AMU'. The Richmond Local Plan notes the vision for the Mortlake AMU is based on the redevelopment of the Stag Brewery (the application site) and seeks an appropriate mix of uses to generate vibrancy and local employment as well as leisure opportunities on the site. This includes restaurants, cafes, community uses, a museum, boat houses and affordable workspace for small businesses.

211 As previously mentioned, Site Allocation SA 24 outlines the Council's support for the comprehensive redevelopment of the site, including a mix of uses appropriate to delivery of a new 'Village Heart' for Mortlake. Envisioned uses for the redevelopment of the site in the site allocation include educational, residential, employment, retail, health facilities, community, social infrastructure, river activities and sport and leisure functions.

212 The scheme (as amended) provides 13,917 sq.m of new town centre uses, which are concentrated on the portion of the application site situated east of ship lane.

Town Centre Use	Original Scheme (February 2018) – sq.m.	Amended Scheme – sq.m.	Area change
Flexible commercial	4,686	<b>5,023</b>	+337
Office	2,424	<b>5,523</b>	+3,099
Gym	740	<b>0</b>	-740
Cinema	2,120	<b>1,606</b>	-514
Hotel	1,673	<b>1,765</b>	+92
<b>Total</b>	<b>11,643</b>	<b>13,917</b>	<b>+2,274</b>

Table 7.0 – Town Centre Uses – Net change comparison with previous scheme.

213 Flexible commercial uses are proposed to accommodate a mixture of A1/A2/A3/A4/B1/D1 and Sui Generis (boathouse) uses, within the following floorspace caps secured by planning obligation.

Use Class	Minimum sq.m (GIA)	Maximum sq.m (GIA)
Class A1	0	2,200
Class A2	0	220
Class A3	0	2,400
Class A4	0	1,800
Class B1	2,000	2,200
Class D1	0	1,300
Sui Generis (boathouse)	0	380

Table 8.0 – Commercial floorspace caps.

### *Retail, leisure and community uses*

214 As noted above, the provision of flexible commercial uses (including retail) is consistent with the objectives outlined in Policy LP 25 and Site Allocation SA24 of the Richmond Local Plan, which call for redevelopment of the site to include a mixture of uses generating vibrancy and local employment to create a new 'Village Heart' for Mortlake.

215 In support of establishing a new 'Village Heart', retail and leisure uses are concentrated at street level in the eastern portion of the application site between Mortlake High Street and the River Thames, as shown in the following diagram:



Figure 2.0 – Extract from 'Proposed Masterplan Ground Floor Level' (source: Squires Drawing Ref: 18125\_C645\_MP\_P\_00\_00a\_C).

216 A desired quantum of retail and leisure uses on the site is not outlined in Site Allocation SA24 or the Council's 'Stag Brewery, Mortlake, SW14, Planning Brief SPD'. Notwithstanding this, in terms of retail and leisure the proposals are broadly consistent in size and area previously proposed within the scheme as considered by Richmond Council in January 2020. In considering that scheme, Richmond Council officers considered the findings of the Retail and Leisure Statement, prepared by RPS and dated September 2019, and concluded that the quantum of these uses would neither exceed the anticipated retail need nor result in unacceptable adverse impact on the viability and vitality of nearby centres. A Retail and Leisure Statement Addendum (July 2020), has been submitted in support of the amended scheme, which demonstrates that the small increase in flexible use floorspace is offset by the expenditure derived from the increased residential population of the scheme. As such, the scheme would result in a lower level of impact on surrounding centres and remains acceptable. The Council has not raised any objection on this basis.

217 The scheme would provide up to 1,300 sq.m. of community space, secured at a peppercorn rent for a minimum period of 10 years. This is supported in line with the



policy context noted above, as well as the Site Allocation and Planning Brief. It will be secured in the s106 agreement.

218 The ground floor of Building 9 is designated as a flexible commercial use, and intended as use as a Sui Generis boathouse for river rowing. River related water sports activities are consistent with the desire to incorporate a diversity of social infrastructure in accordance with London Plan Policies S1 and S5. Such uses are also supported by Policies SI14 and SI16. Furthermore provision of new facilities for river activities and water sports in the redevelopment of the site is expressly supported by Local Plan Policy LP 18, which supports developments that “incorporate uses that enable local communities and the public to enjoy the riverside, especially at ground level in buildings fronting the river”, as well as Site Allocation SA 24 of the Richmond Local Plan and the Stag Brewery Planning Brief SPG. On this basis, the proposed inclusion of a boathouse is strongly supported, and will be secured in the s106 agreement.

219 It is noted that London Plan Policy S6 requires large scale developments that are open to the public or include large areas of public realm, such as this scheme, to provide free to access public toilets. There are no dedicated public toilets proposed within the scheme, nor have these ever been envisaged as part of the design. The absence of such provision is contrary to Policy S6 and this policy conflict must be considered as part of the planning balance.

#### *Night-time economy*

220 Policy HC6 of the London Plan seeks to protect existing night time economy land uses, whilst supporting the growth and diversification of new uses in appropriate locations. The London Plan and the Mayor’s SPG specifically recognise the important role that London’s public houses play in the social fabric of communities. The Mayor’s Social Infrastructure SPG encourages the maintenance and enhancement of existing community facilities, and Policy HC7 of the London Plan requires the refusal of schemes which result in the loss, without replacement, of existing public houses. Local Plan Policy LP 27 resists the loss of public houses.

221 Application A proposes both a new cinema and public house land use adjoining the northern edge of Lower Richmond Road. In the above policy context these uses are strongly supported in providing a diversified offering of night-time economy land uses in this Area of Mixed Use. The cinema is located immediately next to the existing Jolly Gardeners Public House which is outside the site area on Lower Richmond Road. The cinema represents a diversification of night-time uses which is considered to support rather than detract from the ongoing viability of that existing public house, and is therefore supported.

222 The existing Ship public house is situated on Thames Bank immediately west of Ship Lane and the Maltings Building. Once completed, the proposals will result in significant local population increase with improved river-front activity from the creation of new public realm drawing people through the site to the river front where the Ship is situated. The introduction of residential uses to the site is not considered to be a concern from an Agent of Change perspective owing to separation distances.

223 The proposals are therefore compliant with the policies noted above concerning the night-time economy.

## *Hotel Use*

224 Policy E10 of the London Plan supports the expansion of London's visitor economy, seeking improvement to the capacity, range and quality of visitor infrastructure. Policy E10 stipulates that in outer London, and those parts of inner London outside the Central Activities Zone, serviced accommodation should be promoted in Town Centres and within Opportunity Areas. Policy LP 25 of the Richmond Local Plan outline that new major hotel development is appropriate within the five main centres and within AMUs. Furthermore, Policy LP 43 outlines general support for visitor accommodation where the impacts of development on amenity, living conditions, parking, servicing and transport are considered acceptable.

225 The application proposes a new 16-bed pub-hotel occupying parts of the former Bottleworks building, which is situated on the northern corner of the roundabout junction between Mortlake High Street / Lower Richmond Road and Sheen Lane. The proposals represent a return to the historical use of this portion of the site for hotel visitor accommodation.

226 Although the application site falls outside the five designated main centres identified by the Richmond Local Plan for major hotel development in the first instance, it is contained in the Mortlake AMU, which local policy considers appropriate for a range of town centre uses. At 16 bedrooms in capacity, the scale of proposed pub-hotel accommodation is not considered to be comparable to 'major new hotel development', and instead represents small scale visitor accommodation at a local scale. In this respect it is noted that Site Allocation SA24 and the Stag Brewery Planning Brief SPG seek to create a new 'Village Heart' for Mortlake. The proposed small-scale hotel use is located amongst, and considered complementary to, the mix of flexible retail, leisure and employment generating uses proposed in the eastern portion of the main application site.

227 A 'Hotel Need Assessment' (July 2020) has been submitted in support of the application, and accounts for the small (92 sq.m) expansion of hotel floor area compared with the scheme previously considered by Richmond Planning Committee in January 2020. Having considered the previous Hotel Need Assessment (February 2018), Richmond Council officers concluded that the proposed hotel use was:

*"... in line with the aspirations of the local plan, is not deemed to be of an excessive size for the location and will have minimal impact on hotel supply in the local area."*

228 It is not considered that the proposed minor increase in hotel floor area (+92 sq.m) would have a material impact on the previous determination that a small scale hotel was suitable in this location, and it remains supported.

## *Office and Affordable Workspace*

229 Policies E1, E2 and E3 of the London Plan outline support for the provision of office floorspace in outer London, where this is focussed on identified town centres or existing office clusters.

230 Whilst the main application site is not situated within a designated town centre or existing office cluster (such as a Local Plan Key Office Area), the site is situated within

the Mortlake AMU wherein Policy LP 25 and Site Allocation SA24 of the Local Richmond Plan seek delivery of a variety of town centre uses to establish a vibrant local employment environment, including suitable provision of affordable workspace for small and medium enterprises (SMEs). The Site Allocation is not prescriptive in terms of the quantum of employment space envisaged, but does seek a “substantial mix of employment uses”.

231 Application A proposes 5,523 sq.m. of dedicated office space, along with the flexible floorspace caps of the scheme allowing flexibility to provide a further 2,000-2,200 sq.m of office (B1) floorspace (making a total of up to 7,723 sq.m.). The dedicated office floorspace has been increased by 3,099 sq.m. as part of the amended scheme and the flexible floorspace would potentially allow for 200 sq.m. more.

232 The Council’s consultation response welcomes the opportunity to deliver new office stock, in part to offset losses in the Borough. GLA officers agree and consider that the provision of this quantum will not compromise the function of nearby town centres, and would be complementary to the variety of employment uses provided to support the function of the new ‘Village Heart’ provided on the eastern portion of the main application site in accordance with Local Plan policy.

233 Policy LP 41 of the Richmond Local Plan requires the provision of affordable floorspace on all major developments with over 1,000 sq.m of office floorspace proposed. This is supported by Policies E2 and E3 of the London Plan which seek the provision of affordable workspace and workspace suitable SMEs in new office developments.

234 Application A proposes 10% of office B1 floorspace to be affordable office floorspace, secured through the section 106 legal agreement. This includes a commitment to ensure affordable workspace is managed by a single dedicated workspace provider, secured for a period of at least 15 years, and offered at rates no higher than 80% of market rent.

235 Office uses are consistent with local and strategic policy directions regarding appropriate land uses for the redevelopment of the site, and as such are supported.

### *Employment and Training*

236 London Plan Policy E11 states that strategic development proposals should support local employment, skills development and training opportunities. Policy LP 29 (B) of the Richmond Local Plan requires a Local Employment Agreement to be secured through s106 agreement where construction and end use of a new development would generate more than 20 (full time equivalent) jobs.

237 A socio-economic assessment and employment assessment of the proposals have been provided as part of the Environmental Statement submitted alongside the applications. This assessment demonstrates that the completed development would generate approximately 349 net FTE jobs.

238 In accordance with policy requirements, a construction and employment skills plan will be secured in the s106 agreement, ensuring local employment during the construction phase of development.

## Education Facilities

### *Policy Context*

239 Paragraph 72 of the NPPF outlines that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. To achieve this objective, the NPPF encourages local planning authorities to adopt an approach (to meeting this requirement and to development that will widen choice) that is proactive, positive and collaborative.

240 Policy S3 of the London Plan seeks to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice. Boroughs should ensure development plans are informed by a needs assessment of education and childcare facilities, identify suitable sites for future provision through the development plan process (particularly in areas with significant planned growth), and ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools. Part B of the policy requires, amongst other things, development proposals for educational facilities to be located in areas of identified need, in accessible locations and to be designed in ways that minimise health impacts and support active lifestyles for children. Additionally, the Mayor's Social Infrastructure SPG states that new sites for schools should be secured to meet additional educational need.

241 Policy LP 29 of the Richmond Local Plan outlines that the Council will work proactively to encourage the provision of facilities and services for education and training of all age groups. This includes supporting the provision of facilities to meet the needs of primary and secondary school places (as well as pre-school and other education and training facilities); safeguarding and encouraging the maximisation of existing educational and training sites; encouraging flexible and adaptable buildings co-located with other social infrastructure; identifying new sites for educational uses as part of the development plan; and working with developers to secure new sites for education facilities, ensuring sufficient pre-school, primary, secondary and sixth form spaces can be provided for children aged 2-18.

242 Paragraph 8.2.11 of the Richmond Local Plan states that adequately sized sites for new schools within the borough areas where additional student places are needed are extremely rare, and identifies the application site as one of four sites specifically identified for the provision of new educational uses for the purposes of the Local Plan. This paragraph, and Site Allocation SA 24 (Stag Brewery, Lower Richmond Road, Mortlake) both indicate that redevelopment of the application site must include a new 6-form entry secondary school, including sixth form.

### *Assessment against educational facilities policy*

243 The scheme, through Application B, proposes a new 6-form entry secondary school with sixth form. The school would provide for up to 1,200 pupils, with 900 pupils in years 7-11 and approximately 250 pupils in sixth form.

244 A number of objections have been received during public consultations on the proposals, which relate to the provision of a school on the application site. These objections primarily relate to the impacts of the school in regards to the loss of playing fields, amenity and transport impacts on surrounding road and public transport networks.

These impacts and their mitigation are detailed further in the 'Development on Playing Fields', 'Impacts on Neighbouring Amenity' and 'Transport' sections of this report. Objections also challenge the need for a new school, outlining perceived errors in the figures and assumptions used to determine the need for additional school places in the borough.

245 The Council Officer report to the Richmond Council Planning Committee held on 29 January 2020, and subsequent resolution of the committee to Approve Application B, notes that the education use proposed for the Application B site is "wholly supported" and responds to the evidential need for new secondary school places. In support of this, the report considers the analysis of student demand provided in London Council's Do the Maths report of 2016, as well as the Council's School Place Strategy of 2018. These reports outline growth in the overall number of school places required across London (by 24.9% from 2010/11 to 2019/20) as well as increased demand on existing school places within the borough occurring over the previous five years. Paragraphs 40 and 41 of the GLA Stage 2 Report also address this issue, which notes that London Council's Do the Maths 2020 report identifies a predicted shortfall of 5,938 secondary school places in London by 2022/23.

246 The underlying analysis above has informed the recently adopted Richmond Local Plan (2018 & 2020), which specifically identifies the application site for the future development of a new 6-form entry secondary school and sixth form, through paragraph 8.2.11 of the supporting text for Policy LP29 and Site Allocation SA 24 – Stag Brewery, Lower Richmond Road, Mortlake.

247 It is noted that objections have been received questioning the need for the school and putting forward alternative school needs figures, albeit that these are contested by the Council's assessment. Even if the alternative figures are used there is still a need for additional forms of entry at secondary level and, noting the Council's concerns at paragraph 7.1.126 of its committee report regarding the constraints of expanding existing schools, it has not been demonstrated that the alternatives are feasible, viable or deliverable.

248 The policy context of the NPPF and the London Plan support the provision of new schools where identified by local authorities to meet local need. In this instance, there is a clear need evidenced in the recently adopted Local Plan that allocates this site for the exact type of school proposed. Furthermore, the Council supports the school proposed in Application B. The proposed school would assist in mitigating the impacts of the proposed development in terms of child yield for secondary education. The Council has confirmed that sufficient capacity exists in the local area to cater for primary school aged children arising from this development.

249 The school has been designed to be accessible and ensure sufficient provision of outdoor space, including sports facilities, and its entrance and play areas would be located away from sources of pollution, linking to existing and proposed footpath networks. Community use of the school facilities would be secured by condition.

250 Adverse local impacts of the new school are considered to be adequately mitigated through the measures detailed under 'Development on Playing Fields', 'Impacts on Neighbouring Amenity' and 'Transport' sections of this report. As such, the proposed school is strongly supported and is considered to be in accordance with national, London-wide and local planning policy.

## Development on Playing Fields and Designated Open Space

### *Site and Policy Context*

251 The existing Watney Sports Ground is located on the south-western corner of the main application site, on land proposed for the new school in Application B, and incorporating an area proposed for a new public park on the northern boundary of Lower Richmond Road in Application A. The land is designated as Other Open Land of Townscape Importance (OOLTI) in the Richmond Local Plan, as demonstrated in the following figure:



Figure 3.0 – Other Open Land of Townscape Importance (Orange Hatching) - (source: Richmond Council Officer Report to Planning Committee – 29 January 2020).

252 There is no formal public access to the existing sports pitches, having historically been provided for recreational use by brewery employees. Notwithstanding this, the sports ground is utilised by the youth division of Barnes Eagles Football Club, as well as Thompson House School and St Mary Magdalen School. The total usage by these three groups is understood to be approximately 111 days a year.

253 Paragraph 97 of the NPPF affords protection to sports and recreational land and buildings, including playing fields. This states that such areas should not be built on unless an assessment has been undertaken to demonstrate that the open space, buildings or land is surplus to requirements or development is for alternative sports and recreation use in circumstances where the needs for such use outweigh the loss of any existing provision. Alternatively, any loss resulting from development should be replaced by equivalent or better provision of sport and recreation facilities.

254 Policy G4 of the London Plan resists the loss of protected open spaces unless equivalent or better provision is provided within the local catchment area. In specific regards to playing fields, Policy S5 of the London Plan also resist the loss of playing fields and existing sport and recreation facilities unless the existing uses are surplus to requirements, replaced with equivalent or better facilities, or development is for alternative sports and recreation uses where benefits would outweigh the loss of the current or former use.

255 Policy LP14 of the Richmond Local Plan states that OOLTI will be “protected in open use, and enhanced where possible”. Policy LP31 seeks to protect and enhance formal and informal sports grounds and playing fields. The policy stipulates that any loss of playing fields is expected to meet the exceptional circumstances test outlined in Sports England Policy. There is an expectation that developments deliver an overall enhancement of sports facilities and the provision of wider benefits including public access, in order to promote physical activity and encourage healthier lifestyles.

256 Sport England’s guidance includes exception tests outlining the circumstances in which the loss of playing fields can be justified. To meet exception test E5, it needs to be demonstrated that the proposed development is for an indoor/outdoor sports facility of sufficient sporting benefit to outweigh the detriment caused by the loss of the playing field.

#### *Development on Playing Fields – Assessment*

257 The existing sports ground currently provides two unlit youth-sized grass pitches measuring 91 metres in length and 55 metres in width. Alongside these, a small pavilion building currently provides toilets and changing room facilities. The existing arrangement of sports facilities is detailed in the following figure:



Figure 4.0 – Existing playing fields arrangement (source: Application B Design and Access Statement Volume 4: Secondary School Design, Squires & Partners, February 2018).

258 Across the land currently occupied by the existing sports ground, the proposals comprise a new school (6-form entry secondary and sixth form) located on the Application B site, and a new public park provided in the portion of Application A site located adjacent the intersection of Lower Richmond Road, as detailed in the following figure:

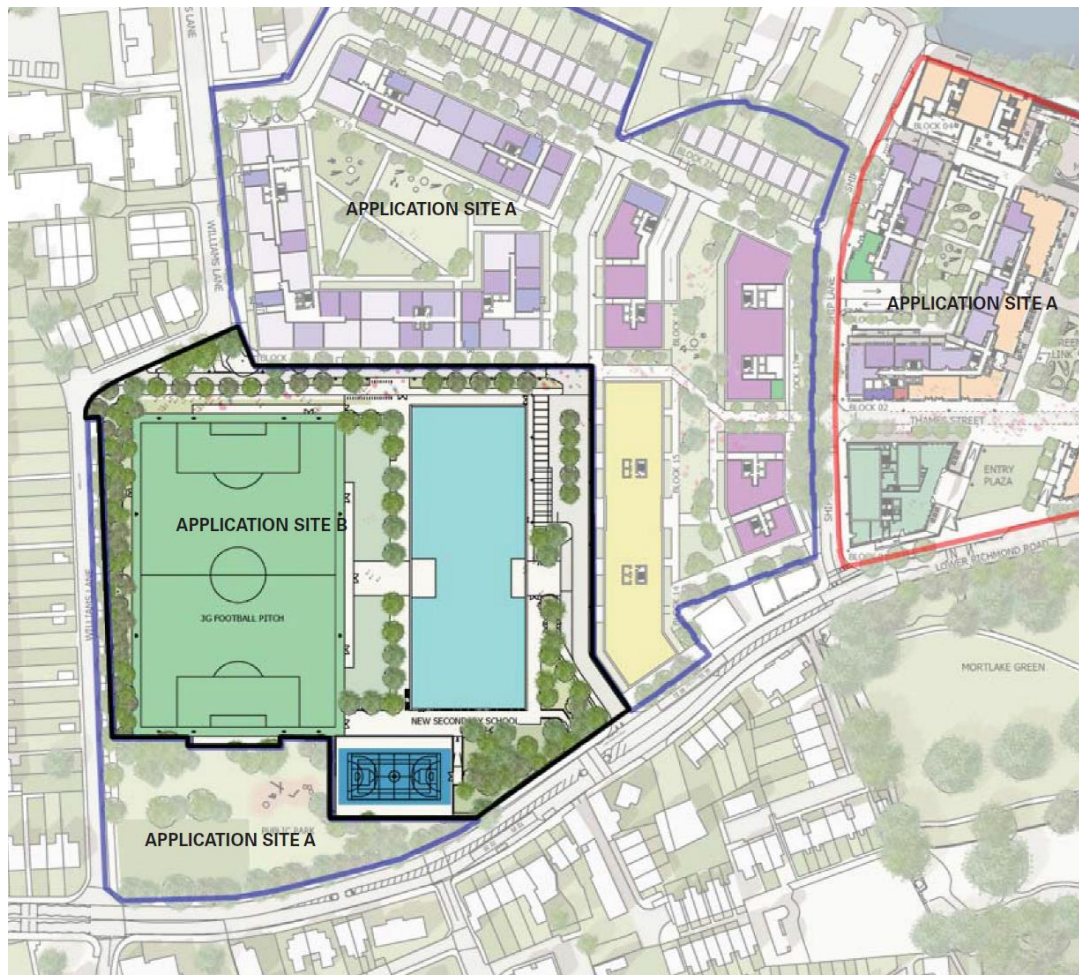


Figure 5.0 – Former Sports Ground development layout (source: Application B Design and Access Statement Volume 4: Secondary School Design, Squires & Partners, February 2020).

259 The proposals specifically include the following replacement sports and recreation facilities:

- 3G youth football pitch (64 metres x 100 metres) with floodlights.
- 4 court sports hall meeting Sports England Specifications (34.5m x 20m x 7.5m)
- Activity hall / Studio (150 sq.m.)
- Multi-use games area (MUGA) – (26.5m x 36.3m)
- Changing facilities (male, female and staff)
- A new community park (Application A site area)
- Financial contribution towards improvements of alternative grass pitches.



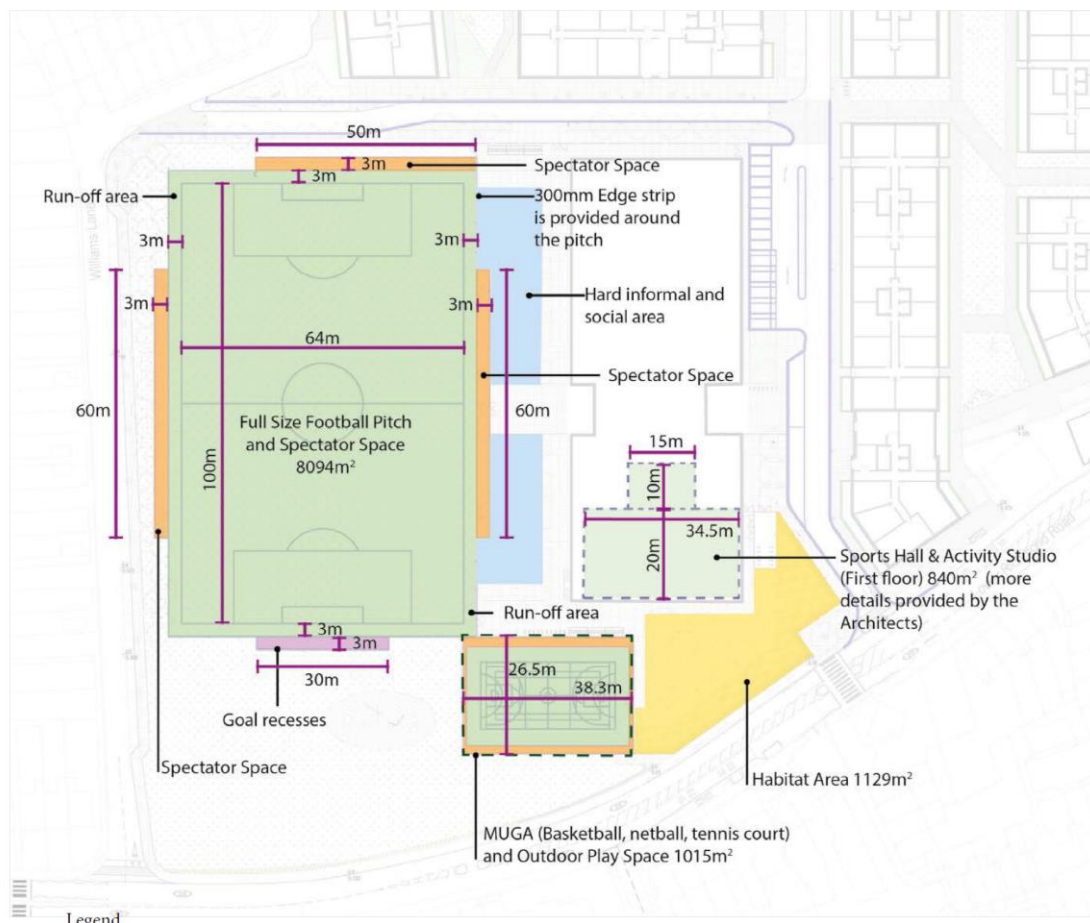


Figure 6.0 – Proposed sports and recreation facilities (source: Application B Design and Access Statement Volume 4: Secondary School Design, Squires & Partners, July 2020).

260 In terms of public access to the new sports facilities, the application proposes that the sports facilities would be primarily available year-round for use by the new school during operational hours. Outside of these times, availability of facilities for wider community use at the following times is to be secured through a Community Use Agreement:

- 5pm – 9pm weekdays during school term time
- 9am – 9pm during weekdays outside of school term time, and on Saturdays.
- 9am – 8pm on Sundays and Public/Bank Holidays.

261 The present use of the site by the Barnes Eagles Football Club is reflected in the following terms secured in the s106 agreement:

- A temporary license allowing Barnes Eagles FC to continue use of the existing grass pitches and sports pavilion until such time as the school development commences.
- A financial contribution of £90,750 towards the provision of temporary football pitches, secured for the use of Barnes Eagles FC, whilst the redevelopment works are in progress.
- A further annual contribution of £43,375 towards the provision of temporary football pitches, secured for the use of Barnes Eagles FC, in the event that new facilities are not available for use within three years of school development works starting.
- Agreement for the priority use of the 3G pitch by Barnes Eagles FC at an agreed rate reflecting current use (1 weekend and 1 evening session).

- Prevention of any termination of the existing licence agreement governing current use of the site by Barnes Eagles FC until the initial Barnes Eagles contribution has been paid.

262 Subject to the above considerations, Sports England have previously confirmed that the proposals would satisfy Exception Test 5 in the Sports England Guidance on the loss of playing fields. The replacement facilities would meet an identified need for 3G sports pitches in the local area, and provide a more accessible and versatile sporting benefit to the local community, which in conjunction with the proposed floodlighting provides greater playing time and outweighs the loss of the existing private grass pitches. The impacts of the sports pitch and associated floodlighting on residential amenity is addressed later in this report.

263 Similarly the proposed replacement of the existing two unlit private grass pitches with secured community use for an all-weather and floodlit 3G pitch, MUGA, Sports Hall and Activity Studio ensures that the loss of protected sports and recreation facilities is outweighed by equivalent or better provision in the new development. The proposals are therefore consistent with the intent of Paragraph 97 of the NPPF, compliant with Policies S5 of the London Plan and LP31 of the Richmond Local Plan and, as such, are supported.

#### *Open Space - Assessment*

264 The main application site comprises 2.2 hectares of land designated within Richmond's Local Plan as 'Other Open Land of Townscape Importance' (OOLTI), which comprises the blue outlined area containing Watney's Sports Ground (shown in blue hatching) as detailed in the following diagram.

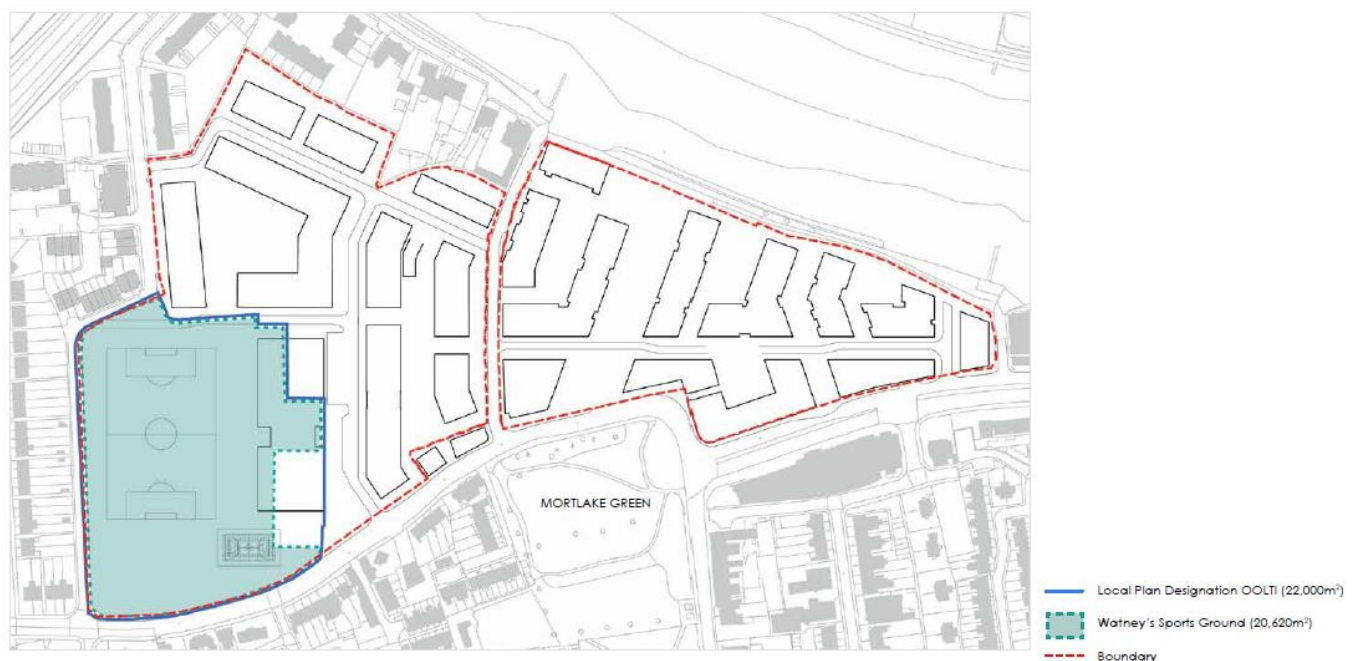


Figure 7.0 – OOLTI Open Space (source: OSPPA Addendum, July 2020).

265 The previous iteration of the scheme was accompanied by an Open Space and Playing Pitch Assessment, which has subsequently been reviewed and further amended as part of the July and September 2020 scheme amendments.

266 The proposals result in the construction of the new school and school playing fields across a portion of the existing OOLTI designated land on the site. As a result, the scheme proposes the redistribution of OOLTI open space throughout the application site area to account for new areas of public realm created by the proposal. In total 43,687 sq.m. of publicly accessible amenity space is proposed, including 28,120 sq.m of public accessible green space to be provided, as demonstrated in the following figure. This compares with no publicly accessible open space presently existing on the site, noting that the existing OOLTI land at Watney’s Sport Ground comprise private playing fields.

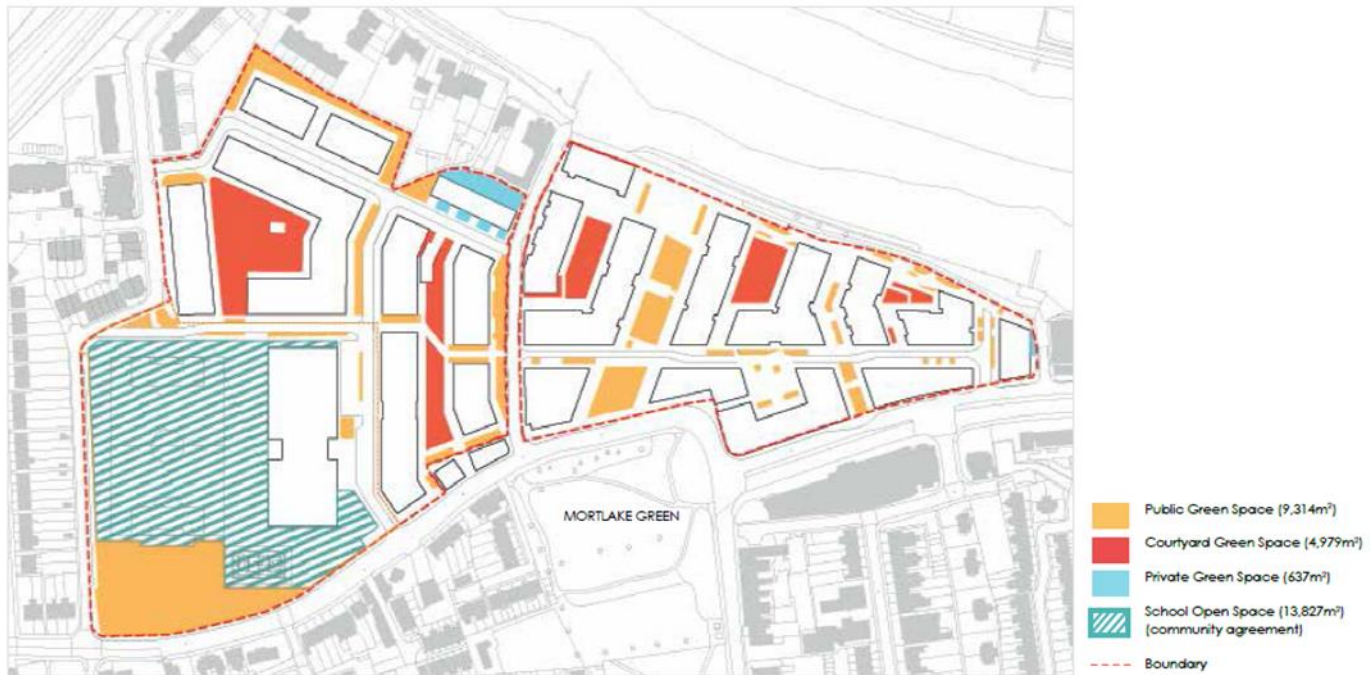


Figure 8.0 – Proposed publicly accessible green space (source: OSPPA Addendum, July 2020).

267 The concept of redistributing OOLTI across the site is accepted in line with Policy LP 14 of the Richmond Local Plan, given the exceptional circumstances created by the broader placemaking objectives of the redevelopment site as expressed in both the Stag Brewery Planning Brief and Site Allocation in the Richmond Local Plan. By comparison with the scheme previously considered by Richmond Council in January 2020, the amended proposals represent a further uplift of approximately 39% in the quantum of publicly accessible open space as demonstrated in the following comparison table:

Open Space	Original Scheme (sq.m.)	Revised Scheme (sq.m.)	Net change (sq.m.)
Public Green Space	8,499	9,314	+815
Public Space	17,474	22,210	+4,736
Courtyard Green Space	4,948	4,979	+31

Courtyard Space	7,325	7,650	+325
Private Amenity Space	5,912	4,000	-1,912
Private Green Space	2,990	637	-2,353
School Open Space	14,144	13,827	-317
Overall Amenity Open Space	47,537	47,687	+150
Total Publicly Accessible Amenity Open Space	38,943	43,687	+4,744

Table 9.0 – Amenity space comparison

268 In addition to an overall uplift in the quantum of OOLTI space achieved by distribution across the site, the overall quality, functionality and accessibility of open spaces is considered to be significantly improved by the proposals. At present, the OOLTI protected areas constitute private playing fields, utilised under agreement by the Barnes Eagles Football Club and two nearby schools. By comparison, the variety of new areas of public realm proposed will be more widely publicly accessible. Community Access to sports facilities at the school site is secured through a new Community Use Agreement. In addition, the new public park situated on the portion of pre-existing OOLTI between the school fields and Lower Richmond Road, as well as the new 'Green Link' connecting Mortlake Green with the River Thames, are considered to represent substantial improvements to the quality, legibility and usability of the public realm.

269 As discussed above, the proposed sports facilities associated with the school will support a broader range of activities than the existing two half-sized football pitches, and will be accessible to the wider community outside of school hours through a community use agreement secured in the s106 terms.

270 Overall, the proposed rearrangement of OOLTI land represents an increase in the quantum, quality, functionality and accessibility of public realm and areas of open land across the site. It is therefore supported in accordance with Policies G1 and G4 of the London Plan and LP 14 of the Richmond Local Plan.

#### Land use principles – Conclusion

271 The redevelopment of non-designated industrial land for the proposed mix of land uses, without the provision of replacement industrial capacity, is in line with Local Plan and London Plan policies.

272 The provision of flexible commercial uses (including retail and office) and the restoration of small scale pub-hotel visitor accommodation is consistent with the objectives outlined in Site Allocation SA24 of the Richmond Local Plan and the Stag Brewery Planning Brief SPG, which call for redevelopment of the site to include a

mixture of uses generating vibrancy and local employment to create a new 'Village Heart' for Mortlake.

273 The proposals would contribute significantly to the London Plan housing and affordable housing targets, as well as Richmond's annual housing and affordable housing delivery targets.

274 The Council's evidence on the Borough's school place demand is recognised and, as such, the provision of a secondary school is supported. Adverse local impacts of the new school are considered to be adequately mitigated (as discussed below).

275 The proposals would satisfy Exception Test 5 in the Sports England Guidance on the loss of playing fields. The proposed replacement of the existing two unlit private grass pitches with secured community use for an all-weather and floodlit 3G pitch, Multi-Games-Use-Area, Sports Hall and Activity Studio ensures that the loss of protected open space, sports and recreation facilities is outweighed by equivalent or better provision in the new development.

276 The proposed rearrangement of OOLTI land represents an increase in the quantum, quality, functionality and accessibility of public realm and areas of open land across the site.

277 The proposals are in accordance with the NPPF, London Plan 2021 Good Growth Objectives and Policies SD6, SD7, H1, H4, S1, S3, S5, E1, E2, E3, E4, E7, E8, E9, E10, E11, HC6, HC7, G4, SI14 and SI16; and Richmond Council's Local Plan Policies SA24, LP14, LP18, LP25, LP29, LP31, LP34, LP41, LP42 and LP43.

## **Housing**

### Affordable housing policy and financial viability

278 The NPPF states that local planning authorities should specify the type of affordable housing required, and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities. Paragraph 57 states that the weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.

279 In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance (SPG), which sets out his preferred approach to maximising the delivery of affordable housing, and introduced the Fast Track Route for applications that meet or exceed the Mayor's threshold for affordable housing. The SPG confirms that a scheme's eligibility for the Fast Track Route is subject to affordable housing being provided on site and with an appropriate tenure mix provided. In addition, to qualify for the Fast Track Route, applicants must have explored the potential to increase the level of affordable housing using grant funding and an 'early stage review mechanism' must be secured, which seeks to incentivise early implementation. Applications that are not eligible for the Fast Track Route are to follow the 'Viability

Tested Route' and required to submit a financial viability assessment, be subject to a late stage viability review mechanism, with additional mid-term reviews for lengthy phased developments.

280 The threshold approach to affordable housing is set out in Policies H4 and H5 of the London Plan. Policy H4 sets a strategic target for 50% of all new homes to be affordable. Policy H5 identifies a minimum threshold of 35% affordable housing (by habitable room); or 50% on public sector owned sites, and industrial sites appropriate for residential uses where the scheme would result in a net loss of industrial capacity. In this case the main application site is classified as a non-designated industrial site, having been in former use as an industrial brewery. The proposals do not re-provide the existing industrial capacity of the site and, while it is acknowledged that this is not expected through the Site Allocation, nonetheless, the threshold to apply to the proposals is 50%. As such, given that 30% affordable housing is proposed through Application A, the application is required to follow the Viability Tested Route.

281 Policy H6 of the London Plan confirms the Mayor's priority to deliver genuinely affordable housing and sets out minimum expectations in relation to tenure split. This requires at least 30% of affordable housing to comprise low cost rent units (either social rent or London Affordable Rent); 30% intermediate housing; with the remaining 40% determined by the borough.

282 Policy LP 36 of Richmond's Local Plan seeks 50% of new homes (by unit) to be affordable, with a desired tenure mix of 40% of affordable rent and 10% affordable intermediate products (i.e. 80% of all affordable housing as affordable rent, and 20% as intermediate).

#### Assessment against Affordable Housing Policy and Financial Viability

283 When considered at Richmond Council's Planning Committee, the viability assessed number and tenure for the residential components of the scheme (Application A) was as detailed in Table 10.0 below. As the application was a hybrid application, the precise mix of accommodation in the outline phase (Development Area 2) was unknown, however conditions were proposed to secure the mix shown in the table below. In total the combined scheme provided 663 residential units, 150 assisted living units, and a nursing/care home with up to 80 bedrooms. The application proposed a minimum of 12% and a maximum of 17% affordable housing by habitable room, with a tenure split 80/20 of London Affordable Rent/London Shared Ownership. Table 10.0 below shows the proposed number of units by tenure based on the maximum affordable housing provision. Under the minimum scenario the scheme would provide 95 affordable housing units.

Housing Tenure	Proposed Units
Private Housing	525
London Affordable Rent	110
London Shared Ownership	28
Flexible residential/Assisted Living Units	150
Total	813

Table 10.0 – Residential tenure (by unit) as proposed at LBRUT Planning Application Stage.

284 Within this, the viability assessed residential mix for Development Area 1 (the detailed element) was as set out in Table 11.0 below.

	1 bed	2 bed	3 bed	4 bed	Total
Total habitable rooms	100 (7%)	732 (52%)	520 (36%)	75 (5%)	1,427 (100%)
Total Units	50 (11%)	244 (56%)	130 (30%)	15 (3%)	439 (100%)

Table 11.0 – Residential mix – Development Area 1, as proposed at LBRUT Planning Application Stage.

285 Noting that the precise mix of accommodation in the outline phase (Development Area 2) was to be determined at Reserved Matters stage, Richmond Council's resolution to grant approval secured the following overall residential mix in the development through planning conditions.

Residential Tenure	Residential Unit Size Mix (by unit)		
Private units	11% 1 bed units		
	56% 2 bed units		
	30% 3 bed units		
	3% 4 bed units		
Affordable accommodation	Unit Type	LAR	SO
	1 bed units	5%	60%
	2 bed units	40%	40%
	3 bed units	50%	0%
Flexible/assisted living units	4 bed units 5% 0%		
	Maximum 10% 3 bed units		
	Maximum 60% 2 bed units		

Table 12.0 – Residential mix – Application A overall (outline and detailed phases), as proposed at LBRUT Planning Application Stage.

286 It is noted that the Council's independent viability advisers and the applicant's advisers (BNP Paribas Real Estate), did not come to agreement on the financial viability assessment of the scheme. The Committee Report identified disagreement on inputs

relating to Finance Rate, Target Profit (private), and Benchmark Land Value. Notwithstanding these, it was agreed that the proposal at committee stage was unviable when assessed on a current day basis. However, the extent of deficit varied significantly between consultants as detailed in the below table.

287 Since the Deputy Mayor’s decision to take over the applications, further negotiations and rigorous examination of the viability of the scheme has been undertaken by GLA officers. The scheme has subsequently been amended to include an increased provision of housing and affordable housing. The scheme now proposes 1,250 new residential dwellings, and 30% affordable housing by habitable room (28% by unit) as set out in Table 14.0 below.

288 The revised affordable housing tenure split is 36% London Affordable Rent / 64% intermediate (41% LAR and 59% SO by habitable rooms). The revised intermediate housing provision initially comprised of 14 three bed London Living Rented units, with 148 units to be provided as London Shared Ownership. The applicants have agreed to amend the intermediate affordable housing mix so that the scheme provides a greater proportion of intermediate rented housing (London Living Rent or Discounted Market Rent).

Tenure	Low Cost Rent		Intermediate				Private market	
	London Affordable Rent		London Shared Ownership		Intermediate Rent – London Living Rent / Discount Market Rent			
Unit Size	Original	Revised	Original	Revised	Original	Revised	Original	Revised
1 bed	6 (5%)	8 (6%)	17 (60%)	67 (45%)	0 (0%)	0 (0%)	62 (12%)	309 (35%)
2 bed	45 (40%)	49 (39%)	11 (40%)	81 (55%)	0 (0%)	67 (83%)	273 (52%)	397
3 bed	55 (50%)	64 (50%)	0 (0%)	0 (0%)	0 (0%)	14 (17%)	163 (31%)	173 (19%)
4 bed	6 (5%)	6 (5%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	27 (5%)	15 (2%)
<b>Total</b>	<b>112</b>	<b>127</b>	<b>28</b>	<b>148</b>	<b>0</b>	<b>81</b>	<b>525</b>	<b>894</b>

Table 14.0 – Revised housing Mix (combined data sources: Gerald Eve further Addendum Town Planning Statement – July 2020).

289 As noted above the three bed intermediate rent units will be provided as London Living Rent. The two bed intermediate rent units are to be provided as London Living Rent or Discount Market Rent. The applicant wishes to retain discretion to determine which tenure is provided, however the council considers that this should be specified by council or the GLA. This will form part of further discussions with the parties on the S106 agreement



290 GLA officers' assessment of the viability of the scheme has been based on this revised mix and tenure for the masterplan.

### GLA review of financial viability

291 GLA officers have rigorously assessed the financial viability of the amended scheme to ensure that the maximum amount of affordable housing is secured. In assessing the viability of the proposals, consideration has been given to:

- The FVA prepared by BNPP for the applicant dated February 2018 relating to the original scheme planning application. This included specialist advice, specifically on benchmark land value by Savills and construction costs by Gardiner & Theobald (G&T).
- The draft review of this dated April 2018 by the Council's adviser (GL Hearn-subsequently Carter Jonas (CJ)). This included specialist advice on construction costs by Johnson Associates (JA).
- Subsequent additional information and commentary from BNPP and CJ.
- FVA addendum prepared by BNPP dated June 2020 updating the original FVA and altering inputs to assess the revised scheme.
- Subsequent additional commentary from BNPP (Particularly on profit approach and benchmark value.) and G&T.
- Report from Johnson Associates (JA) dated October 2020 and subsequent information on construction costs and programming.

292 The GLA have reviewed the assumptions in BNPP's assessment for the revised scheme, together with the inputs adopted by BNPP and CJ for the original scheme. The following main areas of disagreement have been identified with the approach taken by BNPP:

- Affordable Housing values
- Ground Rents
- Build Costs (including contingency)
- Profit
- Finance Rates

### *Affordable Housing Values*

293 Having reviewed the information provided in relation to this application and taking into account other schemes reviewed by the GLA, the applicants London Affordable Rent values are considered to be appropriate. However, the GLA have applied amended values for shared ownership, London Living Rent, and Discounted Market Rent. This results in an average blended affordable housing value of £365 per square foot (psf), compared with the applicant's blended rate of £327psf.

### *Ground Rents*

294 The applicant's previous FVA relating to the scheme considered at Richmond Council's Committee had included income from ground rents. Notwithstanding this, the applicant's 2020 assessment for the amended scheme undertaken by BNPP did not

include ground rent income. This is on the basis of potential government legislation relating to long leasehold rents and the Homes England prospectus for 'Help to Buy'. BNPP considered that, if ground rents were to be included, a yield of 10% would reflect the risk to the developer that income may not eventuate.

295 GLA Officers note that ground rents are currently required and that evidence considered in the applicant's FVA to determine residential values includes reference to schemes where ground rents are applied. Relying on schemes where ground rents are included to determine future residential values, whilst excluding ground rent income and the impact of such on residential values, is not a consistent approach.

296 GLA Officers consider that ground rents, set at £450 per annum capitalised at a 5% yield, should be included which improves the viability of the scheme.

### *Build Costs*

297 BNPP has relied on a Cost Plan prepared by G&T. This is an updated estimate from the initial 2018 assessment.

298 The G&T cost estimate has been reviewed by Johnson Associates (JA) acting for the GLA. JA had previously reviewed the costs assessed in the original application on behalf of the Council. Their conclusions on specifications were that generally, the proposed specification is in line with similar projects in this type of location.

Notwithstanding this, there is scope for further rationalisation on the following items:

- The provision of cooling to the top apartments may not be justified;
- Rationalise the provision of fitted furniture e.g. omit the wardrobe in the second bedroom;
- Rationalise quality of floor, wall and ceiling finishes further (JA have reduced the timber engineered floor rate but consider that there is also scope with the ceramic tiling rates);
- Rationalise the balcony units and also the terrace decking, both of which are at the top end of expectations;
- Quality of external works / landscaping rationalisation of finishes. This may be planning driven and required to establish the 'sense of space' that this scheme will require.

299 Total build cost (excluding contingency) assessed by the applicant, following additional discussion on the above matters between G&T and JA, is £591,925,000. GLA considers this build cost should instead be £588,249,500 as justified in the JA assessment. The difference in overall build costs is therefore £3,675,500

300 In respect of contingency, the G&T cost plan incorporated a 7.5% construction contingency. BNPP had included a 5% contingency allowance, with a separate additional developer's contingency allowance of 2.5%. In keeping with advice provided to the GLA by JA, a 5% contingency allowance has been adopted in GLA assessments without further developer contingency, as such additional contingency is not considered to be justified in this instance.

## *Profit*

301 GLA officers have assessed the target return on the basis of the rates below. This is a target profit of £150,113,822, equating to a blended rate at 16%.

<b>Type of Development</b>	<b>Percentage of GDV</b>	
	<b>BNPP</b>	<b>GLA</b>
Market Tenure Housing	20%	17.5%
Affordable Tenure Housing	6%	6%
Commercial	15%	15%

Table 15.0 – Comparative profit assumptions.

302 The 20% rate adopted by BNPP is at the top end of typical allowances for market housing. GLA considers this to be a prime development opportunity with the potential for substantial improvement in values through the ‘place making’ process and changing market conditions. Other aspects of the scheme including phased delivery mitigate risk to the developer. A return of 17.5% is consistent with the approach adopted by CJ and in line with the return adopted on a range of other referable applications, including large scale developments with infrastructure costs, and less well-connected sites in lower demand areas.

## *Finance Rates*

303 A finance rate of 7% has been adopted by BNPP applied to 100% of development costs. Total finance costs equate to 8.9% of total scheme costs based on a benchmark land value of £32,150,000. This is at the upper end of the range of finance rates typically adopted.

304 It is considered that developments of this size would usually be completed by large, publicly quoted developers with access to lower borrowing costs. A rate of 6.5% is considered to be more appropriate in this case and has been adopted in the GLA’s appraisal.

## *Benchmark Land Value*

305 Benchmark Land Value is assessed in the applicant’s FVA on a ‘Red Book’ valuation provided by Savills, assuming redevelopment of the site as B1 uses. The approach adopted has been to divide the subject site into four main components: Western Site, Eastern Site, Victorian Warehouse & Front Building and Metropolitan Land.

306 Savills has undertaken residual appraisals for the ‘Western Site’ and ‘Eastern Site’, arriving at land values of £22,000,000 and £18,500,000 (or £2.652m and £2.596m per acre) respectively. By comparison, Carter Jonas has considered comparable evidence and indicated a land value of circa £2m per acre. If applied to the subject sites, this would equate to land value of £16,590,000 and £14,240,000 for the Western and Eastern sites respectively. GLA officers consider the lower alternative use value provided by Carter Jonas to be reasonable.

307 With respect to the 'Victorian Warehouse and Front Building' land, GLA officer's agree with Savills in considering a total residual value of £2m to be reasonable, on the assumption of being an alternative use value assessment.

308 With respect to the 'Metropolitan Land', Savills has identified four transactions across Greater London to inform their opinion of value, with an average of £127,019 per acre derived from these comparisons. Notwithstanding this, the Savills analysis ultimately applies a land value of £250,000 per acre to the 'Metropolitan Land' portion of the subject site. GLA officers do not agree that the value of the subject 'Metropolitan Land' site would be twice as high as the average land value of the four comparable sites provided, and instead assess the existing use value (EUV) at £130,000 per acre, marginally in excess of the average of the four comparable sites provided.

309 As a result of the above considerations, the GLA have applied a BLV of £36,000,000, This reflects both the circumstances of the site, which is no longer in operation as a brewery and is not well located for alternative industrial uses, while still providing a minimum return to the landowner in line with viability guidance.

#### Other considerations

310 In addition to the above, aspects of scheme design have been identified that have a net negative impact on viability, including the cost of the basements, cinema and large unit sizes. Amendments to these elements could enhance economic efficiency and also enable improvements to the affordable housing provision. These issues should be considered in subsequent assessments including at reserved matters stage and viability review mechanisms, as should any reduction in costs assumed relating to the provision of the school.

#### Outcome of appraisals

311 The BNPP assessment identifies a residual profit of £2m against a target profit of £167m. On this basis they conclude that the proposed affordable housing is in excess of the maximum viable amount.

312 BNPP have undertaken sensitivity testing to assess the extent to which private sales values and costs would need to change to generate a profit at the target level. Even where sales values increase by 10%, but construction costs are unchanged, the development return falls significantly short of the target level.

313 This assessment does not however demonstrate that the development would be deliverable in line with the Affordable Housing and Viability SPG. Furthermore, a sense check of the outcome of the current day appraisal has not been undertaken.

314 GLA officers have undertaken their own 'Argus' appraisal of the scheme based on current day values and costs and the above GLA positions with respect to outstanding areas of disagreement. The results indicate that the scheme would result in a calculated profit of £80,833,234, representing 8.59% of the Gross Development Value (GDV). This calculated profit falls below the accepted target profit of £150,113,822 (being 16% blended rate of GDV). However, it is noted that the GLA calculated shortfall against target profit is significantly less than that previously determined by BNPP.

315 Notwithstanding the identified shortfall, sensitivity testing undertaken by GLA officers indicates that in a scenario where residential sales values are 10% higher, the scheme would produce a profit in the order of 15.6% of GDV. This is notably in the region of the 16% target profit considered appropriate to the GLA. If market values and construction costs are both 10% higher, the viability position improves, but the target profit is not achieved. There is however potential for significant increases in values and costs over the course of the development programme which are likely to have a net beneficial impact on viability. In addition, amendments to elements of the scheme could enhance its economic efficiency and enable improvements to affordable housing provision.

316 On the basis of the above, it is accepted that the scheme proposes the maximum viable level of affordable housing when assessed on a current day basis. However, there is potential for the target profit to be achieved or exceeded as the development is progressed, which should be considered in any subsequent assessments and in viability review mechanisms.

### Affordable housing planning obligations

#### *Phasing*

317 Various restrictions will be placed on the occupation of market housing before the affordable housing is delivered. These provide for the early delivery of 48 LAR units, with the remainder of the affordable housing to come forward alongside other phases or at an advanced staged of the development. The council has requested additional occupation restrictions between the initial and latter restrictions to ensure delivery throughout the application process which will be taken into account in further discussions on the S106 agreement between the parties.

#### *Viability Review Mechanisms*

318 An early stage viability review will be secured by planning obligation, which would be triggered if substantial implementation (completion of the basement to shell and core finish on land situated either to the east or west of ship lane, and completion to first floor of buildings that are to accommodate 150 Dwellings) is not achieved within 36 months from the date of Planning Permission being granted. A term of 36 months has been considered appropriate noting the scope of works required to achieve substantial implementation and the likelihood that this would be unachievable within the typically expected 24-month period from consent. Provisions which allow for the applicant to request delay to the substantial implementation date for reasons directly resulting from the Covid-19 or related pandemic are considered reasonable in current circumstances.

319 A 'mid-stage' viability review will also be secured at the point whereby 400 dwellings are in occupation. Such a review is appropriate given the multi-phased nature of the scheme's delivery which will be built out over several years.

320 The Affordable Housing and Viability SPG seeks to prioritise the provision of additional affordable housing through viability reviews. The council supports this approach and considers that any surplus identified through the mid-stage review should result in additional onsite affordable housing. The applicant has however agreed to the mid-stage review on the basis that this results in the delivery of additional LAR units rather than shared ownership. Taking into account the proposed tenure split which is

weighted towards the provision of intermediate homes, in this case, it is considered appropriate for any surplus identified through the mid-term review to increase the proportion of London Affordable Rent homes rather than result in an overall uplift in affordable housing.

321 A 'late-stage' viability review will be secured at the point where 75% of private Market Housing units have been disposed. Surplus profit identified at 'late-stage' review would result in a financial contribution to the Council for the delivery of additional off-site affordable housing.

322 The multiple review stages secured will help to deliver additional affordable housing and/ or a higher proportion of London Affordable Rented Housing throughout the lifetime of development.

### *Grant Funding*

323 The S106 agreement will require that the availability of council grant funding is explored both following completion of the agreement (and in any event at least 6 months prior to implementation of the development) and on completion of the mid-stage review to enable the delivery of additional affordable housing where this is feasible. This obligation is in line with the London Plan requirement to use grant to maximise the delivery of affordable housing where available.

### *Eligibility and Affordability*

324 Policy H6 of the London Plan and the Mayor's Affordable Housing and Viability SPG set out the Mayor's priority to deliver genuinely affordable housing. London Affordable Rent constitutes a low-cost rent product for households on low income, with rent levels based on social rent and set in relation to the GLA's published benchmarks set out in the Mayor's Affordable Homes Programme Funding Guidance. The proposed London Affordable Rent units will be available for low income households nominated by the council and will have rent levels as set annually by the GLA, which will be secured in the section 106 agreement. These are set at a rent which is no higher than benchmark rents published annually in the Mayor's Funding Guidance (excluding service charges). Additional obligations will be secured to ensure that service charges are fair and reasonable, and that they are approved by the council.

325 Intermediate units will be prioritised for local residents with a range of incomes living, working in or with a local connection to the London Borough of Richmond.

326 Shared Ownership units would be subject to the eligibility and affordability requirements as set out in the London Plan and the Annual Monitoring Report, to ensure that annual housing costs (including mortgage payments, rent and service charge) do not exceed 40% of net household income (as updated in London Plan Annual Monitoring Reports). A maximum gross income of £47,000 will apply for two thirds of London Shared Ownership units and for the remaining third, this will be £50-60,000 for one-bedroom units and £60,000 to 70,000 for two-bedroom units. These will be indexed to changes in London incomes if the most recent AMR is not published within the last 12 months prior to the relevant sale. In addition, to further ensure that sufficient intermediate housing tenures remain genuinely affordable, 60% of shared ownership units have a defined market value cap of £600,000. In the event this cap is exceeded, these units will be provided as London Living Rent..

327 London Living Rent units are secured for delivery by an Affordable Housing Provider and will be restricted to occupation on a time-limited basis by tenants meeting eligibility and household income requirements. Annual housing costs (including both rent and service charges) are restricted and must not exceed the relevant maximum rents published annually by the GLA and 40% of net household income for the maximum income for intermediate rented housing as updated in the London Plan Annual Monitoring Report.

328 Discount Market Rents units would be subject to restrictions which ensure that rent is no greater than 80% of local market rent, including both rent and service charges. Occupation of Discount Market Rent units would also be subject to the eligibility and household income requirements as set out in the London Plan, to ensure that annual housing costs (including rent and service charges) do not exceed 40% of net household income for the maximum income for intermediate rented housing as updated in the London Plan Annual Monitoring Report.

329 The affordability levels proposed for London Affordable Rent, London Living Rent, Shared Ownership and Discount Market Rent units are acceptable and comply with London Plan income and eligibility requirements. This would be secured within the section 106 agreement, should permission be granted, together with the viability review mechanisms and other provisions as described above.

### *Summary*

330 Having regard to the viability position of the scheme, affordable housing of 30% affordable by habitable room (28% by unit) with a tenure split of 36% London Affordable Rent / 64% Intermediate (being mixed Shared Ownership, London Living Rent and Discount Market Rent) is considered to be the maximum viable level on a current day basis. Affordability levels set out above, accord with the NPPF, London Plan Policies H4, H5, and H6, the Mayor's Affordable Housing & Viability SPG, and Policy LP36 of the Richmond Local Plan.

### Housing Mix

#### *Policy*

331 Policy H10 of the London Plan states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. These include recognition that a higher proportion of one and two bed units may be more appropriate in locations closer to a town centre, station or with higher levels of public transport access and connectivity; and the role of one and two bed units in freeing up family housing.

332 Policy LP35 of Richmond's Local Plan sets out desired housing mix and requires that developments generally provide family sized accommodation, except within designated Main Centres or Areas of Mixed Use (AMU's), like this site, where higher proportions of smaller units would be appropriate.

#### *Assessment*

333 The viability assessed housing mix across all phases is set out in Table 16.0 below. As a result of the July 2020 amendments to the scheme submitted since the

Deputy Mayor’s decision to take over the Application, the number of family sized (3 bedroom +) units has increased from 251 to 272 units, 14 x family sized (3 bedroom) units will be provided as London Living Rent, and the number of private market family units has been decreased by 2 units.

334 Whilst the overall proportion of family sized units within the scheme has fallen to 22% (previously 38%), there are a higher number of family sized units overall resulting from the uplift in overall housing delivery in the revised scheme. The quantum of family sized housing is considered acceptable, noting the concentration in affordable housing tenures, with 55% of London Affordable Rent having three or more bedrooms.

Tenure	London Affordable Rent	Shared Ownership	Intermediate Rent (LLR/DMR)	Private market	TOTAL
1 bed	8 (6%)	67 (45%)	0 (0%)	309 (35%)	384 (31% of total)
2 bed	49 (39%)	81 (55%)	67 (83%)	397 (44%)	594 (48% of total)
3 bed	64 (50%)	0 (0%)	14 (17%)	173 (19%)	251 (20% of total)
4 bed	6 (5%)	0 (0%)	0 (0%)	15 (2%)	21 (1% of total)
<b>Total</b>	<b>127</b>	<b>148</b>	<b>81</b>	<b>894</b>	<b>1250</b>

Table 16.0 –Housing size Mix

335 The numbers of units for each tenure are proposed to be secured by planning obligation for the detailed Phase 1 element, whereas the overall masterplan split would be secured within a range reflecting the figures in the above table.

336 Subject to the proposed planning obligations and conditions, GLA officers consider that the proposals represent an appropriate mix of housing tenures and unit sizes considering the location and characteristics of the site and the nature and form of development. Richmond’s Local Plan recognises that higher proportions of one and two bed units may be appropriate in designated Areas of Mixed Use, such as the application site. London Plan Policy H10 recognises the role of one- and two-bedroom units in freeing up family housing, and that a higher proportion of one and two bed units may be more appropriate in locations closer to a town centre, station or with higher public transport access and connectivity. The overall quantum of family sized housing has been improved upon since the Deputy Mayor took over the application. The housing mix of the proposals is supported in line with the NPPF; London Plan; Policy H10; and Policy LP 35 of the Richmond Local Plan. The Council has raised no objections to the amended mix.

## Play Space

### *Policy*

337 Policy S4 of the London Plan states that residential developments should incorporate good quality, accessible play provision for all ages, of at least 10 sq.m. per



child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided within an accessible and safe walking distance, and in these circumstances contributions to off-site provision may be secured by section 106 agreement. The availability of play space must not be separated by tenure, with all playspace available to all children within the development. Further guidance is provided in the Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation SPG (2012), which sets a benchmark of 10 sq.m. of child play space to be provided per child. It states that play space for under-fives should be provided on site, within 400 metres for those aged 5-11, and for those aged 12 and over, within 800 metres.

*Assessment*

338 Based on the submitted residential mix details of the revised scheme and using the methodology of the Mayor’s Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation SPG (2012), there is an anticipated child yield of 646.1 children within the proposed development. Therefore, a minimum of 6,461 sq.m. of playspace must be provided.

339 The applicant has identified within the Landscape Design and Access Statement, a total of 7,520 sq.m. of on-site playspace to be provided within the redevelopment of the application site, which is assessed against the anticipated age-group demand in the following table:

<b>Age Group</b>	<b>Anticipated child yield</b>	<b>Playspace Required (sq.m.)</b>	<b>Playspace provided in masterplan (sq.m.)</b>
0-3 year olds	260.9	2,609	3,183
4-10 year olds	260.0	2,600	3,465
11-17 year olds	125.2	1,252	872
<b>Total</b>	<b>646.1</b>	<b>6,461</b>	<b>7,520</b>

Table 17.0 –Children’s playspace provision.

340 The play space would be distributed across the site and, conditions of approval secure that access would not be segregated by tenure, with public access to be available during daylight hours. There is an identified shortfall of 380 sq.m in the provision of playspace for older 11-17 year olds within the scheme. Notwithstanding this, the applicant has identified a number of recreational facilities within a 10-minute cycle distance of the application site, as demonstrated in the following diagram:

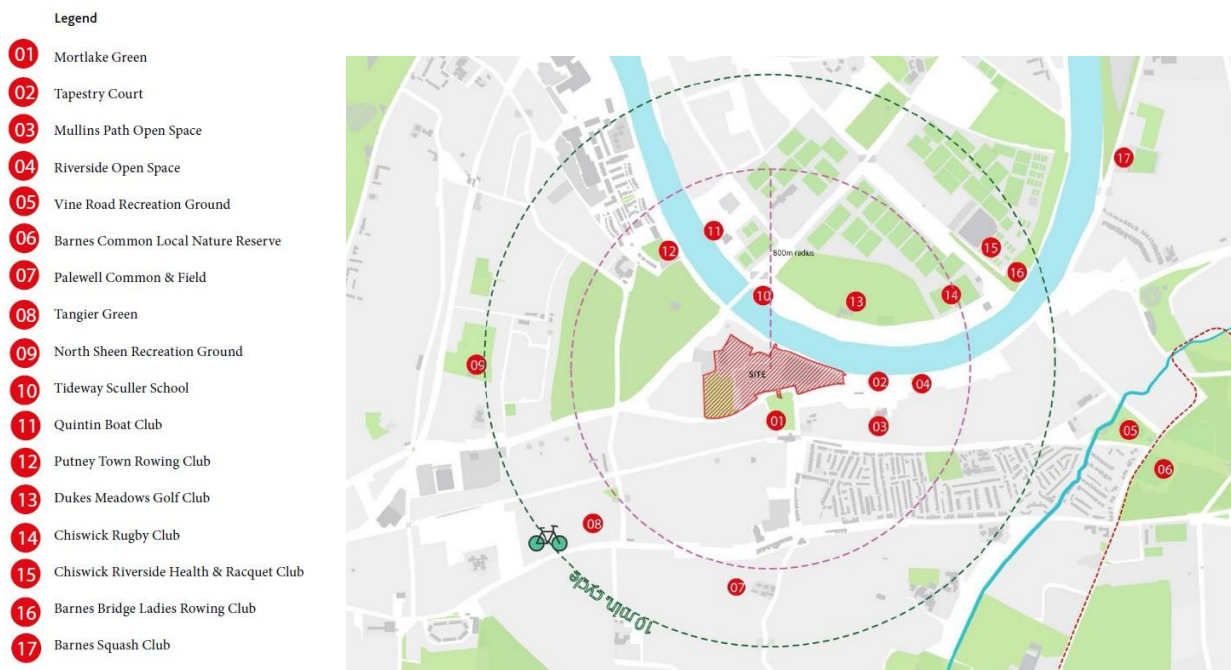


Figure 9.0 –Nearby Recreational facilities (Source: Gillespies Landscape Design and Access Statement, July 2020).

341 In addition, it is noted that a community use agreement will be secured allowing out of hours access to recreational activities on the school grounds proposed on the Application B site (albeit on a paid basis), which includes a 3G pitch, Multi-Games-Use-Area, Sports Hall and Activity Studio.

342 Comments received from Richmond Council during consultation on the amended scheme proposals identified concerns regarding ‘knock-on’ effects from expanded playspace across previous areas of landscaping and paved areas within some access routes. Concern has also been raised regarding the natural focus of play areas with minimal provision of traditional play equipment, along with missing detail regarding playspace and equipment in several locations.

343 Whilst the concerns raised by Richmond Council are noted, it is considered that the concerns raised with respect to individual play equipment and the interaction of playspace with surrounding landscaping are capable of being addressed through submission of further technical details prior to implementation. To this end, conditions of approval are proposed which would restrict development (excluding demolition and excavation) until such time as further details are provided and agreed regarding the surface treatment, siting, design, equipment and features of playspace provided on each development plot.

344 On the above basis, and noting the overprovision of both total playspace and younger children’s playspace, the masterplan provides suitably extensive areas of play space and accords with Policy S4 of the London Plan, and the Children and Young People’s Play and Informal Recreation SPG.

## Urban design

345 The NPPF (at paragraph 124) states that good design is a key aspect of sustainable development. Paragraph 127 of the NPPF sets out a number of high level design objectives for new development, including the need to optimise the potential of a site; provide appropriate and welcoming layouts and landscaping; good architecture; establish a strong sense of place; and be sympathetic to local character, while not preventing or discouraging appropriate change.

346 Chapter 3 of the London Plan includes a range of design principles and requirements for new development and are set out within specific policies on safety (Policy D11); local character (Policy D1); public realm (Policy D8); good design (Policy D4); tall and large scale buildings (Policy D9); inclusive design (Policy D5); and heritage assets and views (Policies HC1 and HC3).

347 Policies LP1, LP2, LP3, LP4, LP5, LP6 and LP8 of Richmond's Local Plan also seek to secure high quality urban design.

## Design scrutiny

348 The proposals have been subject to extensive design scrutiny over several years, at pre- and post-application stage, this included a series of discussions with Richmond Council and GLA officers, other statutory and non-statutory bodies, and public consultation events. After submission of the applications, the proposals were subject to further meetings with Council officers and consultation responses on design. The amendments submitted in May 2019 included design changes in response to these discussions. It is noted that the original scheme was not referred to a design review panel. The Council states that this is because the Richmond Design Review Panel was not established at that time.

349 Since the Deputy Mayor's decision to take over the applications following Richmond Council's resolution to approve the scheme, further design discussions have occurred involving the applicants and their architects, and GLA officers. This resulted in the subsequent submission of the July and September 2020 amendments. The amendments have not been subject to independent design panel review scrutiny, however the layout of the scheme remains largely unchanged with modest height increases. The current proposals have evolved in response to comments made through this iterative process of officer design scrutiny, advice and public consultation.

350 It is recognised that London Plan Policy D4 requires a scheme of this size and nature to have undergone a design review panel process. It is noted however that the policy requires this to occur prior to submission of the application so it would not technically be possible to now comply with this requirement in respect of the current applications. The applications do not comply with Policy D4 in this respect and this must be considered in the planning balance. GLA officers however consider that it would not be reasonable to withhold planning permission on this basis alone given the extensive design scrutiny set out above and the fact that prior to submission of the application to the Council this policy only carried limited weight.

## Site layout

351 The indicative masterplan layout of the application site is shown in Figure 10.0 below.



Figure 10.0: Indicative masterplan layout – (Source: Application B – Landscape DAS)

352 Building footprints in the proposed masterplan layout of the site remain largely consistent with the previous iteration of the scheme as considered by Richmond Council Planning Committee. Changes resulting from the July and September 2020 amendments relate primarily to buildings situated in the north-western corner of the site (buildings 18, 19, 20 and 21), however minor superficial building footprint changes have also been incorporated into buildings 2, 3, 7, 8, 11 and 12.

353 The proposals remain generally consistent with the layout intentions outlined for redevelopment of the site in the Stag Brewery Planning Brief SPG. Key objectives outlined in the SPG seek to ensure that redevelopment of the site creates new frontage to the River Thames and Mortlake High street, provides significant new areas of public realm and creates permeable linkages with the surrounding environment while providing a new 'Village Heart' for Mortlake.

354 In the above context there is strong support for the establishment of a series of new areas of landscaped public realm throughout the site. This is particularly notable in the new 'Green Link' through the site, linking Mortlake Green with the River Thames frontage. The termination of the green link in the newly proposed Maltings Plaza will provide a focal point for public activities along the river frontage, and links well with adjacent improvements to the towpath adjoining the river. Maltings Plaza will also provide physical and visual separation between the historic Maltings Building and the

higher portions of new development to the south and east, ensuring the building retains a degree of prominence when viewed from the north. The buildings would be sufficiently set back from the River Thames with generous public realm to compliment the existing towpath, which is considered to provide adequate space for busier use such as during the University Boat Race. This is in line with London Plan Policy SI 16 which promotes improved access to waterways for water-related cultural, educational and community facilities and events.

355 The position of the new cinema and the return of commercial land uses to Block 5 incorporating the restored facades of the Former Hotel and Bottling Works buildings, will create activity along the southern boundary of the site shared with Lower Richmond Road and Mortlake High Street.

356 The newly proposed 'Thames Street' and Bottleworks Square are considered to provide a suitable environment for the surrounding ground floor commercial uses proposed, in support of the objective for a vibrant 'Village Heart' as sought from the Planning Brief. A condition is recommended to secure details of free drinking water, in line with London Plan Policy D8.

357 Circulation networks throughout the site are well developed and align well with the surrounding urban fabric. The inclusion of a 'pocket park' at the corner of the junction of Williams Lane and the internal road network will enhance the pedestrian environment at this node. Alignment of linkages for crossings of Lower Richmond Road at the School and Mortlake Green is also well considered and supported.

358 Although the inclusion of school related parking along the eastern side of Williams Lane will result in some harm to the existing streetscape, it is acknowledged that this is largely offset through improvements noting the provision of an eastern footpath to Williams Lane and an inset portion of landscaping between the footpath and school fencing.

359 Overall, the proposed layout is supported in accordance with the objectives outlined for future development of the site as outlined in the Stag Brewery Planning Brief SPG and the design policies set out above.

## **Height, massing, townscape and views**

### Tall Buildings Policy

360 Policy D9 of the London Plan states that local development plans should define what is considered a tall building for specific localities and identify suitable locations for their development. Development proposals with tall buildings should address visual impacts at different distances; aid legibility and wayfinding; have exemplary architecture and materials; avoid harm to heritage assets; preserve the Outstanding Universal Value of World Heritage Sites; protect and enhance the Thames; not cause adverse glare; and minimise light pollution. Functional impacts should consider internal and external design; servicing; entrance capacity; area and transport capacity; maximise benefits to the area; and not interfere with communications. Environmental impacts should consider wind, daylight, sunlight, and temperature; air movement (dispersal of pollutants); and noise creation. Cumulative impacts should also be considered.

361 Policy LP 2 of Richmond's Local Plan defines tall buildings as those of 18 metres (six storeys) in height or taller. The policy also defines 'taller' buildings as those significantly taller than the neighbouring buildings, but less than 18 metres in height. The policy requires proposals that are taller than the surrounding townscape to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area, whilst preserving and enhancing the significance and setting of heritage assets. Paragraph 4.2.2, in support of Policy LP 2, identifies Mortlake Brewery (the application site) as being one of a select few specific and exceptional sites, away from Richmond and Twickenham stations, where 'tall' and 'taller' buildings may be appropriate in principle.

362 As is confirmed in the analysis below, most of the buildings proposed are six storeys or more and are therefore considered to be tall buildings in this policy context. The exceptions are the buildings fronting Mortlake High Street and Lower Richmond Road (Blocks 1, 5, 6, 9, 10, 13 (part), 14 and 15 (part)), the buildings in the north-western part of the scheme backing onto Thames Bank and fronting Williams Lane (Blocks 19-22) and the secondary school building (in Application B).

363 The Stag Brewery Planning Brief SPG outlines a range of building heights as appropriate for the site, ranging from 2-3 storeys in the western corners of the site adjacent existing residential and playing fields, and up to 6-7 storeys in the site's eastern portion. Notwithstanding this, the SPG further notes that *"if taller buildings are necessary to ensure a viable scheme (then) higher building could be located at the core of the site, generally where the larger and higher existing buildings are located, and that height and scale diminish towards the perimeter of the site or along the Riverside."*

#### Principle of tall buildings

364 The previous iterations of Applications A and B, as considered at the Richmond Planning Committee, proposed building heights ranging from three to eight storeys across the application site as detailed in the following figure:



Figure 11.0 –Original Proposal: Masterplan Heights (Source: Masterplan and Detailed Design and Access Statement Addendum, September 2020).

365 The revised proposals will retain a comparable layout to the scheme considered by Richmond Planning Committee. However, increased building heights are now proposed ranging from three to ten storeys across the site, as detailed in the following figure:

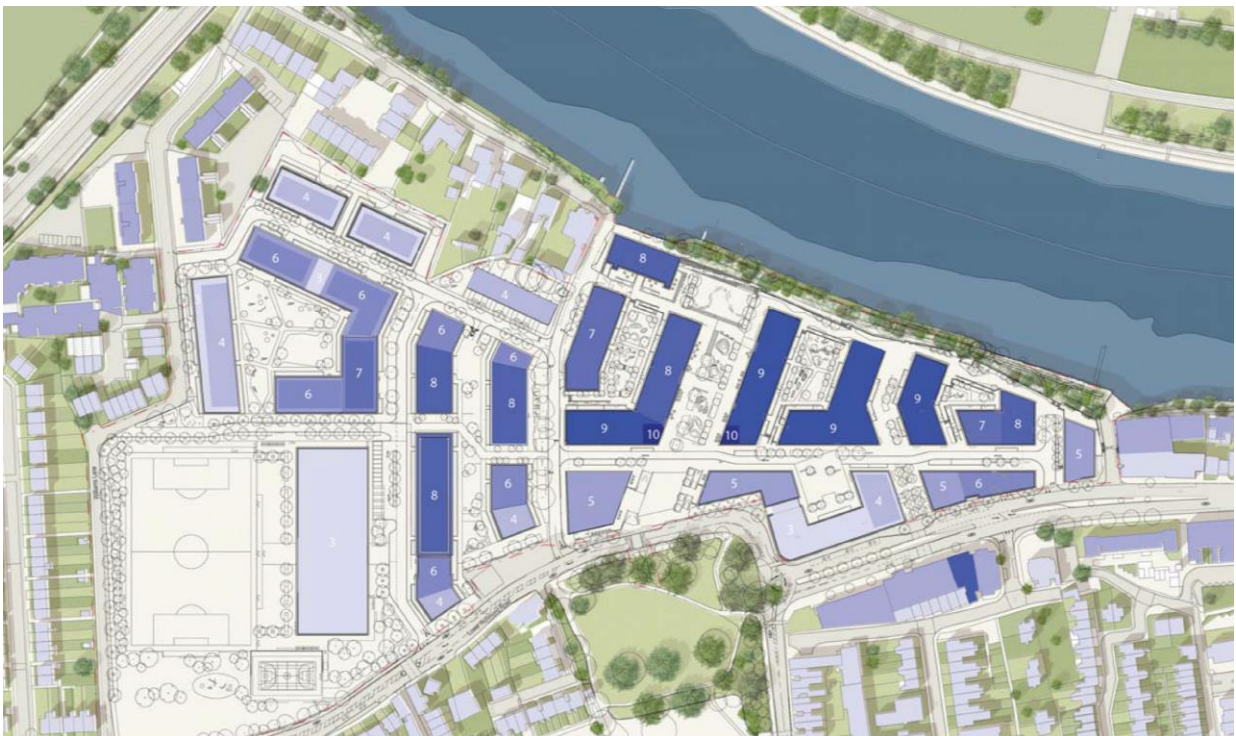


Figure 12.0 –Revised Proposal: Masterplan Heights (Source: Masterplan and Detailed Design and Access Statement Addendum, September 2020).

366 As a result of the scheme amendments, an increased number of the proposed building heights now exceed those outlined in the Stag Brewery Planning Brief SPD, by degrees varying from one to four storeys, as detailed in the following figure:



Figure 13.0 –Revised Proposal: Masterplan Heights against Planning Brief (Source: Masterplan and Detailed Design and Access Statement Addendum, September 2020).

367 Notwithstanding the above, it is noted that the previous schemes resolved to be approved by Richmond Council also exceeded the heights expressed in the Planning Brief SPD. In this regard, the officer report to Richmond committee noted that the Planning Brief SPD:

*“...only provides a broad indication of the expected heights but clearly recognises that height beyond the predominant development pattern of the area is necessary to achieve the strategic aims of the Brief and LP24”.*

368 The principles of the revised height strategy remain as per the original scheme, keeping height to the centre of the masterplan area with clear staggers of lower storeys towards surrounding lower urban form. The proposed buildings immediately adjoining the eastern and southern boundaries of the masterplan area will notably remain within the height guidance of the Planning Brief SPD, excluding a small portion of Building 14 adjacent Lower Richmond Road which, at four storeys, would only exceed the envisioned planning brief height by one storey and for a limited portion. It is noted that the SPD carries less weight than policies of the development plan. It is also 10 years old and pre-dates both current (2021) and preceding (2016) London Plan, as well as the recently adopted Local Plan.

369 The principle of ‘tall’ and ‘taller’ buildings is supported by Local Plan policy and is therefore in accordance with the plan-led approach to tall buildings advocated by London Plan policy. The proposed heights themselves are however not in accordance as they exceed the recommended heights set out in the Planning Brief SPD, which as



Site Allocation 24 specifies, should be given due consideration. In the absence of a more detailed specification for appropriate heights in the Local Plan, the Brief should be taken as the Council's current position on appropriate building heights for the purposes of London Plan Policy D9(B2). There is therefore a conflict with Policy D9 in this regard and this must be considered in the planning balance. The specific impacts of the proposed heights and massing are discussed in the following sections.

### Visual impacts

370 In order to assess the visual impact of the proposals, a series of key townscape views were agreed between the applicant and Richmond Council. These views allow the impact of the massing of design proposals on the surrounding context to be assessed. In addition to key river views, principle townscape views from the south of the application site relate to impacts of development when viewed from Mortlake High Street, Mortlake Green and Lower Richmond Road.

371 The visual impact on designated and non-designated heritage assets is discussed separately under the Historic Environment subheading of this report.

#### *River views*

372 The scale of the development impacts a number of key views, including the locally protected views 2a (Mortlake) and 3 (Chiswick Bridge) identified in Policy LP5 of the Richmond Local Plan and the Richmond Policies Map. As both of these views relate to views of the site from the River Thames frontage, requirements of the Stag Brewery Planning Brief SPD and Thames Strategy SPD are also relevant, which seek to ensure buildings are lower in height relative to the existing Maltings Building in order to maintain its prominence as a local landmark.

373 The River Thames is Metropolitan Open Land (MOL), in which Policy G7 of the London Plan requires the openness of MOL to be protected. The towpath and river frontage adjoining the northern boundary of the Application A site, and subject to proposed public realm improvements, also form part of the Blue Ribbon Network. Policies D9 of the London Plan and LP 18 of the Richmond Local Plan are also relevant to the consideration of river views of the development, requiring development to protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.

374 When viewed from Chiswick Bridge (locally protected view 3), the new buildings situated on the eastern portion of the Application A site will appear within the backdrop and surrounding context of the Maltings Building, having roof levels which pierce the silhouette of the Maltings Building. Notwithstanding this, the Maltings Building's location on the immediate East of Ship Lane, and separated from Chiswick Bridge by the lower scale listed buildings along Thames Bank, ensures it still retains its prominence as the first 'step-change' to higher development in the eastern portion of the site. This is further helped by the contrasting external materials and contrasting 'mansion block' typology of the buildings which form the backdrop of the Maltings Building in this view.

375 With respect to the outline component of the development visible behind the listed properties on Thames Bank from Chiswick Bridge, detailed impacts are discussed further under the 'Historic Environment' section of this report. However, in townscape terms it is considered that the buildings in this backdrop are sufficiently stepped away

from the Thames Bank properties so as not to adversely impact this portion of the view. There are positive townscape impacts noted from the removal of the existing unsympathetic large-scale industrial buildings which presently form the backdrop of these buildings along Thames Bank.

376 Existing and proposed vistas from Viewpoint 5 (Looking across the Thames from Dan Mason Drive) demonstrate that, from the immediate north, the scale of proposed buildings on the eastern (detailed) portion of Application A are compatible with the relevant height of the existing Maltings Building. Higher elements of the eastern portion of the development will be separated from the Maltings by the new 'Maltings Plaza', with building heights progressively scaling down from 9 to 5 storeys eastward across the portion of the site towards the boundary with Bulls Alley. Buildings fronting the Towpath on the eastern portion of the site present the narrowest elevation towards the river, with significant separations between buildings caused by the location of north-south green links and new areas of public realm. There is considered to be sufficient articulation in the footprints of buildings to prevent the appearance of a wall of development or 'canyoning' effect which might otherwise undermine the openness of the towpath or river environment in this location.

### *Mortlake High Street*

377 In respect to Mortlake High Street, a significant portion of the existing street-scene will remain largely unaltered given the retention of the existing Former Bottling Plant Building facade. Eastwards of this, a series of modern 'warehouse' typology buildings are proposed spanning between 4 and 6 storeys in height. Wireline images provided from Viewpoint 8 (looking west down Mortlake High Street), along with rendered images provided in the Design & Access Statement Addendum (September 2020), demonstrate that the proposed building heights and architectural treatments sit comfortably with the surrounding buildings in Mortlake High Street when viewed from this angle, particularly in context with the immediately adjacent 'Boat Race House'.

378 When viewed in an easterly direction along Mortlake High Street from the roundabout with Sheen Lane and Lower Richmond Road, the restored facades of the Former Hotel and Bottling Plant Buildings will remain the prominent feature of the development. It is acknowledged that Richmond Council has raised objection to amendments resulting in an inset modern additional floor on the eastern portion of the Bottling Plant Building. However, GLA officers consider this addition to result in negligible impact on the overall appearance of the development from street level. The restored facades maintain the historic street-scene, and the taller modern 'warehouse' style buildings which appear further westward down Mortlake High Street are of a high architectural quality and consistent with the building heights envisioned for this portion of the site in the Stag Brewery Planning Brief SPG.

### *Mortlake Green*

379 Existing and proposed views northward towards the development from Mortlake Green (Viewpoint 10), in the Mortlake Green Conservation Area, demonstrate a significant change of townscape context from the existing industrial buildings. From this perspective, a new visual linkage will be established towards the River along the newly proposed Green Link stretching to Maltings Plaza, which is strongly supported. This linkage is flanked by residential buildings with 10 storey feature turrets, and with

prominent activity generating uses (a new cinema and the re-established hotel) in the foreground fronting Lower Richmond Road.

380 Whilst new buildings in this viewpoint are significantly taller than the existing industrial street-scene, building heights are progressively stepped away from the southern boundary of the site with Lower Richmond Road. Furthermore, the placement of taller buildings within this view is considered largely inevitable given the objectives of the Planning Brief to concentrate higher buildings within the eastern portion of the application site. Richmond Council has raised objection to the impact of increased building heights from the scheme considered by Planning Committee in January 2020, stating that the amended height of Blocks 6, 7 and 8 north of the Former Hotel Building will visually overwhelm the restored facade. GLA officers consider that the heightened form of buildings in the background in this view would provide a simpler backdrop in brick which contrasts with the grey materials of the roof.

381 Further rendered images provided in the Design & Access Statement Addendum (September 2020), looking east and west along Lower Richmond Road towards the new cinema building, demonstrate the positive impact of improved fenestration to this building since the previous consideration of the scheme at Richmond's Planning Committee. The ground floor plinth and upper level brick materials align sympathetically with the architectural features of the neighbouring Jolly Gardeners Public House. Furthermore, the recessed facade of the cinema building fronting Lower Richmond Road ensures the distinctive form of the Pub building remains a prominent feature in the streetscene.

#### *Williams Lane and Thames Bank Properties*

382 With respect to the western interface of the site with surrounding existing development in Williams Lane, the adjacent proposed Buildings 18, 19 and 20 are now proposed at three to six storeys in height (compared with previous buildings of three to four storeys in height in the original scheme for this location). Where previously Block 18 in the original proposal presented a 4 storey facade to Williams Lane, Block 19 in the amended scheme (ranging three to four storeys in height) now proposes a small inset top floor which results in a reduced and staggered building appearance when viewed from the properties situated on the western side of Williams Lane.

383 Visual impact on properties at Reid Court, on the eastern side of Williams Lane, caused by Buildings 18 (6 storeys) and 20 (3 to 4 storeys) is considered minor and acceptable noting that both new buildings will present narrow side elevations towards the extensive rear amenity area of Reid Court. Furthermore, the small fourth storey portion of Building 20 will be set back behind a three-storey block that conforms with the maximum height envisioned within the Planning Brief SPD.

384 The impact of proposed four storey Buildings 20 and 21, which replace a row of three storey terrace homes in the original scheme, is similarly mitigated to some extent through the uppermost level being set back. Whilst situated closer to the northern boundary of the site than the three-storey terraced houses they replace, Buildings 20 and 21 now exhibit a central separation between buildings at their closest point to the neighbouring residential properties to the north, providing visual relief compared to the previous continuous facade of terraced homes.

## Functional and environmental impacts

385 In terms of wind impacts, these are considered in the Environmental Statement (ES) and ES Addendum, which details model and wind tunnel testing impacts and mitigation. The detail submitted indicates that, with landscaping measures in place, wind conditions would be suitable for the intended uses throughout the detailed portion of the site (east of Ship Lane), resulting in insignificant residual impacts. For the outline portion of Application A, some mitigation may be required in relation to potential seating areas at roof level, however these are capable of being suitably addressed within further detailed design works at Reserved Matters stage.

386 Turning to the other criteria set out in Policy D9 of the London Plan, the following aspects of the detailed element are supported, including cumulative impacts taking account of consented schemes. The architectural quality and materials; sustainable design; building safety; servicing and maintenance; entrance capacity and locations; daylight, sunlight, noise, glare, light pollution, and temperature impacts. The Design Code and Parameter Plans are sufficient at this stage to secure these matters for the outline phases, and will be assessed in detail at Reserved Matters stage. The supporting infrastructure, including transport, is sufficient to meet the needs of the proposals; and will not interfere with aviation or telecommunications. These matters are either discussed elsewhere or were assessed as part of the Environmental Statement and subsequent July and September 2020 ES Addendums as set out above.

## Height, massing, townscape and views summary

387 In conclusion, the scheme is of an acceptable height and massing and has an acceptable impact on townscape and views. It is therefore considered to be compliant with the NPPF; Policies LP 1, LP 2, LP 5 and LP 18 of the Richmond Local Plan. The scheme is contrary to London Plan Policy D9 and Site Allocation 24 in terms of the principle of the proposed building heights and this is considered in the planning balance at the end of this report. The impact on neighbouring amenity is considered later on in this report.

## **Architecture and materials**

388 London Plan Policies D3, D4 and D9 require buildings to be of the highest architectural quality and comprise materials that complement rather than necessarily replicate local architectural character. Richmond Council's Local Plan Policy LP 1 also reflects these aims.

## Application A (Mixed Use)

### *Detailed Consent (Development Area 1)*

389 The scheme provides a series of differing building typologies, reflecting differing placemaking objectives and relative building heights across the application site. Higher buildings located in the central and northern portions of the site are proposed as Mansion Block typology, incorporating a mixture of gable ends and mansard roofs. Warehouse typologies are proposed for new buildings along the southern boundary adjoining Mortlake High Street, excluding the cinema building which will be a modern

and stand-alone architectural character. The Maltings and Former Hotel and Bottleworks Building facades are to be retained and converted in accordance with their original heritage features.

390 GLA officers are supportive of the typologies chosen, which reflect the differing contexts of development around the site. When viewed westwards along Mortlake High Street, the proposed warehouse typologies blend sympathetically with the mixed character of the High Street, in particular relative to the scale and architectural style of Boat Race House situated immediately adjacent Bulls Alley on the site's eastern boundary.

391 The applicant has further tested and refined the character of mansion blocks to account for increases in building heights proposed since the scheme was previously considered by Richmond Council. As discussed in the section above ('Visual impact') the refinement of the treatment of gables and mansard roofs is successful in reducing the impact of additional building heights. Furthermore, the inclusion of additional bay windows increases internal light to residential properties and is also supported.

392 As discussed in the 'Visual impact' section of this report, the use of red brick for the majority of the Mansion Block buildings assists in distinguishing them from the predominantly stock brick former brewery buildings. This helps to define a new character for the central portion of the scheme and ensures that the Maltings building retains its distinctive appearance and prominence in views across the River Thames.

#### *Outline Consent (Development Area 2)*

393 Development west of Ship Lane in Application A is applied for in outline form, with all matters reserved. As a result, the scheme is governed by parameter plans regarding building footprints and heights, with only indicative layouts and architectural details provided at this stage. Notwithstanding this, a comprehensive Design Code has been submitted with the application which outlines guidance for the future architectural principles adopted in Reserved Matters applications.

394 The contents of the Design Code have been refined to account for amendments to layout and design in the July and September 2020 amendments to the scheme. Codes in the document address how the design should be approached in detail, considering sensitivity to building location, activation of building edges and the surrounding public realm.

Typologies and architectural approach secured in the code is generally consistent with that applied for in Development Area 1. Overall the Design Code secures an appropriate architectural quality, while also allowing some flexibility. Detailed architecture and design would be assessed at Reserved Matters stage.

#### *Application B (School)*

395 Application B comprises a three-storey secondary school building of modern architectural character situated on the eastern side of the existing playing fields. The design and layout of the school building remains largely consistent with that considered previously by Richmond Planning Committee. However, some improvements to fenestration have been proposed, including the use of deep windows and refinement of external materials to add more visual interest on the elevations.

396 The use of brick is supported, with mixed horizontal and vertical brick bands considered to be successful in adding visual interest to the building. The use of aluminium framed windows in this regard is also considered acceptable.

397 In terms of internal layout, the design of the school building is considered to be functional and acceptable, with classrooms located around the external perimeter of the building where they will most benefit from natural light and ventilation.

398 The open nature of fencing proposed to the perimeter of the school playing fields, and the inset of fencing behind landscaping on Williams Lane, will soften the appearance of these measures when viewed from outside the site. The overall design of the school is supported in terms of architectural form, layout and appearance.

399 In summary, the design, architecture and materials of the detailed components of the applications are of a high quality and are supported. For the outline portions of Application A, sufficient information has been provided to demonstrate that the proposals would be of a high quality, subject to details to be assessed at Reserved Matters stage. GLA officers consider that the scheme would provide high quality architecture, which would respond appropriately to the local context, in line with the NPPF; London Plan Policies D3, D4 and D9; and Richmond Council's Local Plan Policy LP1.

## **Residential Density**

### *Policy*

400 London Plan Policy D3 seeks to optimise the potential of sites through a design-led approach, having regard to the site's context and capacity for growth, and existing and planned supporting infrastructure capacity, as set out in Policy D2 on infrastructure requirements. The design of the development must optimise site capacity. Optimising site capacity means ensuring that development takes the most appropriate form for the site. Higher density developments should be promoted in areas that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

401 Policy D2 states that the density of development proposals should consider, and be linked to, the provision of future planned levels of infrastructure, rather than existing levels; and be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services). Where there is insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), development should be contingent on the provision of new infrastructure, including public transport services, and development should be phased accordingly.

402 The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the design, as described in London Plan Policies D4 and D2. As discussed above, Policy D4 identifies that proposals with a density of over 350 units per hectare or that include a tall building (as defined by the Borough, or above 30 metres), should be subject to a greater level of design scrutiny.

403 Policy LP 1 of Richmond Local Plan seek to ensure that development respects, contributes and enhanced the local environment; through compatibility with local character including the relationship to existing townscape, development patterns, views,

local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing.

### *Assessment*

404 The proposals would have a net density of 206 units per hectare and 598 habitable rooms per hectare. The application site is within an urban setting, with a PTAL ranging from 1a to 2, although as discussed in the 'Transport' section below a small part of the site scores PTAL 3 and there is the potential for this to improve.

405 The current scheme has evolved in response to comments made through an iterative process of design scrutiny, pre-application advice and public consultation spanning several years. The layout, building separation, residential quality, housing provision and housing mix have been further refined by the July and September 2020 amendments to the scheme made since the Deputy Mayor's decision to take over the applications.

406 As discussed under 'Residential Quality' below, the scheme provides a high standard of residential accommodation, with consideration to space standards; aspect; privacy and overlooking; daylight, sunlight and overshadowing; noise and vibration; and air quality. As discussed under 'height, massing, townscape, and local views' the proposed scale and massing of the scheme is acceptable and provides a new commercial centre for Mortlake as expressly required in the Stag Brewery Planning Brief SPD.

407 The proposals are considered to provide high quality design, public realm, residential and environmental quality; an appropriate housing mix; and appropriate infrastructure provision, in line with the London Plan.

408 The proposed high-density mixed-use redevelopment of the site has been subject to a significant level of design scrutiny and optimises the use of the site. Subject to the conditions and obligations set out in this report being secured, the density is supported in line with the NPPF; London Plan Policies D2 and D3; and Richmond Council's Local Plan Policy LP1.

### **Historic Environment**

409 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and, in relation to conservation areas, special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area".

410 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a

proposed development will lead to 'substantial harm' or total loss of the significance of a designated heritage asset, consent should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal.

411 Policy HC1 of the London Plan states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

412 Policy LP 3 of the Richmond Local Plan requires the significance of the Borough's designated heritage assets to be conserved and enhanced and seeks to avoid substantial demolition in conservation areas, unless necessary to achieve substantial public benefit and the optimum viable use of a site, with benefits which outweigh any harm or loss. Policy LP 4 seeks to preserve and enhance the significance, character, and setting of non-designated heritage assets, including Buildings of Townscape Merit, which contribute to architectural integrity and historic interest.

413 Policy LP 7 of the Richmond Local Plan seeks to protect, enhance and promote archaeological heritage, with development required to take steps to safeguard archaeological remains and their setting.

414 The applications are accompanied by an Environmental Statement which includes a Built Heritage Assessment accompanied by a Built Heritage Statement. These have subsequently been reviewed to consider changes to the scheme contained in the July 2020 and September 2020 amendments.

415 Consultation responses from Historic England stated that the organisation did not wish to offer comments and that the applications should be determined in accordance with national and local policy guidance.



Heritage context

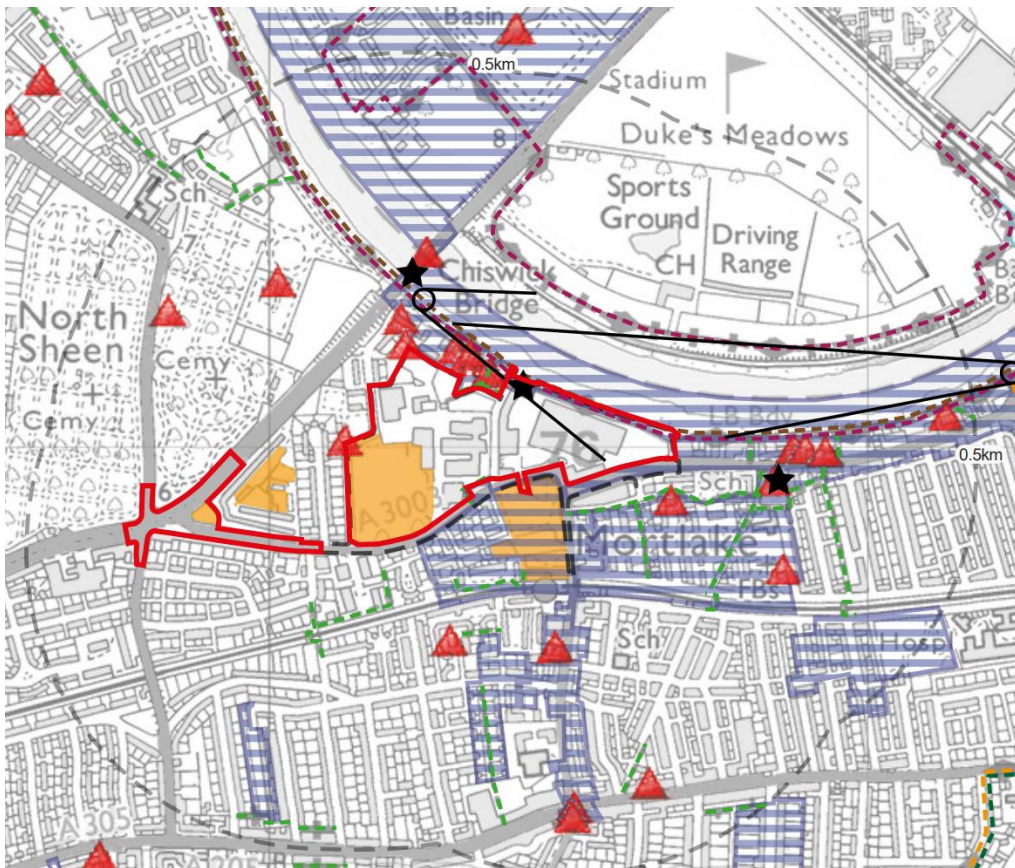


Figure 14.0: map showing site (red outline) along with conservation areas (blue hatch), listed buildings (red triangles), vistas/landmarks (black stars and lines) and 500 metre radius from site boundary (grey dotted line) (extract from ES, WIE10667-101\_GR\_ES\_16.2A)

416 A small portion of the application site adjoining Lower Richmond Road, west of Ship Lane, in the site’s southern portion is located within the Mortlake Green Conservation Area. In addition, multiple portions of the site east of Ship Lane are situated within the Mortlake Conservation Area, including the Maltings Building, Former Hotel Building and Former Bottling Plant, all of which are Buildings of Townscape Merit.

417 The application site is situated adjacent to the remaining portions of the Mortlake Green Conservation Area to the south, and Mortlake Conservation Area to the north and east. The Grove Park Conservation Area, within LB Hounslow, is also located to the north.

418 The following listed buildings and Buildings of Townscape Merit are also in close proximity of the application site:

Listed Buildings	Buildings of Townscape Merit
Thames Cottage – Grade II Listed	The Ship Public House
Tudor Lodge – Grade II Listed	The Old Stables
Thames Bank House – Grade II Listed	1-14 Parliament Mews
Leyden House – Grade II Listed	6 & 7 Thames Bank
Riverside House – Grade II Listed	The Jolly Gardeners Public House

Garden Wall, east of 1-8 Riverside House and behind 1-24 Reid Court – Grade II Listed	
Gateway, formerly Cromwell House – Grade II Listed	
Chiswick Bridge – Grade II Listed	

Table 18.0 – Heritage Assets.

Direct impact on Buildings of Townscape Merit on site, within the Mortlake Conservation Area

419 The application site contains three locally identified Buildings of Townscape Merit, being the Maltings Building, Former Hotel Building and Former Bottling Plant. As with the original scheme, the redevelopment proposals retain and convert the Maltings Building, and retain the front facades of the Former Hotel Building and Former Bottling Plant.

420 The approach of converting and retaining the iconic Maltings Building, whilst incorporating the facades of the Former Hotel and Bottling Plant within new development has previously been accepted by GLA officers, Richmond Council and Historic England (who have not objected to the proposals). It has previously been established that, whilst there would be some harm to these assets as a result of the loss of historic building fabric, any such harm would be outweighed by the benefit of the scheme in restoring the most prominent architectural and historic elements of these buildings and securing their viable long-term use.

421 Additional measures are proposed in the July and September 2020 scheme amendments which are considered to further improve on the treatment of the Former Hotel Building and Former Bottling Plant. Such measures include the retention of brick window arches and the reinstatement and retention of chimneys on the Former Hotel Building. In addition, replicated timber hoist doors and the relocation of a Stag sign are now proposed to the Former Bottling Plant, with internal cast iron columns being retained for use and display elsewhere in the development site.

422 The proposed adaptation of the Maltings Building for residential and community uses remains strongly supported, promoting the long-term adaptive reuse of the building, and ensuring it remains as a prominent historic architectural feature of the site. The July and September 2020 amendments to the scheme include further improvement works to the interpretation of the building. These include a reduction in the number of alterations to the original window dimensions, and the omission of balconies, which will substantially improve the interpretation of the building.

423 GLA officers are in general agreement with the applicant's analysis, that the amended proposals to direct building works affecting Buildings of Townscape Merit within the site would further reduce impacts within the site beyond that previously considered. GLA officers are of the opinion that, as with previous iterations of the scheme, harm to the Buildings of Townscape Merit on the site and the significance of this part of the Mortlake Conservation Area remains less than substantial, and is fully justified. The scheme would deliver heritage benefits including the adaption and reuse of the Maltings Building, and the restoration of the most significant facades of the Former Hotel and Bottling Plant Buildings. Impacts on the external views of the site and these

buildings (particularly the Maltings Building) in respect of the surrounding area is discussed further within the 'surrounding context' subheading of this section.

#### *Non-designated assets on-site*

424 The site contains a series of historic brick boundary walls on the northern, eastern and southern boundaries. These walls are situated within the Mortlake Conservation Area. Although considered to have low or neutral historical significance they do contribute in some degree to the evidential value of the area.

425 Excluding a small portion of the existing boundary wall in the site's north-eastern corner, the majority of the brick boundary walls are proposed for demolition. Whilst demolition of these assets is discouraged, in this instance it is accepted that there are no alternatives to demolition which would deliver the comprehensive linkages between Mortlake Green, Mortlake High Street and the River Thames as envisioned in the Planning Brief SPG and broader planning objectives for the site.

426 GLA officers agree with the previous assessment provided by Waterman's and Richmond Council officers, that the removal of the walls would have a permanent and adverse effect of minor to moderate significance on the historic walls. Notwithstanding this, the public benefits achieved by the provision of high quality additional public realm and more accessible public access to the river front is considered to significantly outweigh the resulting level of harm, noting the low or neutral heritage value ascribed to the walls themselves. On this basis, no issue is raised with the demolition of the walls, as proposed, in line with the requirements of Local Plan Policy LP 3.

427 The World War 1 and 2 Memorials on the site will be retained and repositioned in line with the original proposals. This would be acceptable and continues to cause no harm; the appropriate repositioning is secured by condition.

#### Impact on the settings of the surrounding context

428 The Mortlake Conservation Area incorporates portions of the southern boundary of the eastern portion of the site, and adjoins the site's northern boundary along the Thames, where it spans to (and includes) the southern portion of Chiswick Bridge (Grade II listed). The northern portion of Chiswick Bridge falls within LB Hounslow's Grove Park Conservation Area. A number of prominent Grade II listed residential properties are situated on Thames Bank between Ship Lane and Chiswick Bridge, including Thames Cottage, Tudor Lodge, Thames Bank House, Leydon House, Riverside House, and a garden wall situated between Riverside House and Reid Court. The Conservation Area also incorporates the Maltings Building in the northern portion of the application site, as well as the Former Hotel and Former Bottling Plant Buildings on the southern boundary of the site.

429 The significance of the Mortlake Conservation Area stems from both its historic core on the High Street and its intimate relationship with the Thames. The Council's Conservation Area Appraisal notes the interest of the river frontage in terms of its industrial history and the "enormous contrasts in scale" between buildings. The view across the river from Chiswick Bank is noted as "one of buildings set within a landscape where industrial, commercial and residential uses happily coexist".

430 The Mortlake Green Conservation Area bounds the southern boundary of the site. Its significance stems from its collection of locally significant late Victorian and early Edwardian buildings and the sense of place derived from The Green itself. Owing to the size of the Conservation Area, its positioning relative to the site and the openness of The Green, the proposed scheme has the potential to affect its setting.

431 When viewed from Chiswick Bridge and Chiswick Bank (Viewpoints 3, 4, 5 and 6), it is accepted that the amended scheme results in a step change in the scale of development along the riverside, as indeed did the previous scheme approved by Richmond Council. It is, however, noted that the Mortlake Green Conservation Area is partly characterised by contrasts in scale, albeit not to the extent proposed. Furthermore, existing large-scale former brewery buildings and chimneys are currently a dominant presence in the view and the historic images accompanying the application demonstrate that more large buildings fronted the river in the past. Notwithstanding this, GLA officers acknowledge that there would be some harm to the significance of Mortlake Conservation Area, the Maltings Building and the riverfront listed buildings, albeit that this would be less than substantial and at the lower end of the scale. In GLA officers' view this harm is justified given the clear policy aspirations for the site to deliver a residential-led mixed-use development to form a new 'Village Heart' for Mortlake and the high quality design of the proposed development and benefits associated with the redevelopment of the site.

432 There would be no harm to the significance of Chiswick Bridge itself, nor to Grove Park Conservation Area. There would be no harm to the significance of Mortlake Conservation Area or the Maltings Building in Viewpoint 7, with the Maltings Building remaining clearly prominent when viewed along the River Thames.

433 Following the July and September 2020 amendments the increased heights of buildings located on the eastern portion of the site will result in a series of buildings appearing at or marginally above the height of the existing Maltings Building. It is acknowledged that these increased heights will result in a degree of additional harm to the significance of the Maltings Building. However, the perforation of the roofline silhouette of the Maltings Building is relatively minor and largely limited to the impact on Viewpoint 4 from Chiswick Bridge owing to the elevated position of this viewpoint. The position of the Maltings Building adjacent to the low-rise development spanning to Chiswick Bridge ensures the building retains its prominence when viewed from this position. The prominence of the Maltings Building in this view against the backdrop of new development is further helped by the contrasting external materials of the Maltings Building with the new mansion block buildings which will be situated immediately behind. Conditions of approval are proposed to ensure a high standard of architectural materials and finishes.

434 The verified wireline of Viewpoint 5 from the opposite side of the Thames demonstrates that the Maltings Building will retain a degree of separation from the new mansion block development in the eastern portion of the site. This is caused by the location of the new green link between the Riverside and Mortlake Green, which passes immediately east of the Maltings Building. Furthermore, an unencumbered roof line of the Maltings is maintained in this view, given the significant setback of new higher buildings behind the Maltings Building when viewed from this angle. Similar findings are evident in views across the river from the north-east, noting the kinetic nature of the experience.

435 With respect to changes to the scheme affecting the listed buildings along Thames Bank (Thames Cottage, Tudor Lodge, Thames Bank House, Leydon House, Riverside House and the Garden Wall east of 1-8 Riverside and behind 1-24 Reid Court), impacts relate to changes in the backdrop setting of these buildings when viewed from the north across the river. In this respect, it is acknowledged that the western (outline) residential components of Application A will be visible in the background above the existing rooflines of these buildings. This subsequently affects the visual context of these buildings, particularly when viewed from Chiswick Bridge, and results in less than substantial harm to their significance. Despite the increase in height and mass of some buildings, care has been taken to step the massing away and Buildings 18, 20 and 21 have been broken up to relieve the visual impact.

436 When the site is viewed from the south, in Mortlake Green and along the High Street, impacts of the scheme on Mortlake Conservation Area and Mortlake Green Conservation Area relate to the context and setting of the identified Buildings of Townscape Merit in or adjacent the southern boundary of the site adjoining Mortlake High Street and Lower Richmond Road, as well as the streets and spaces within the Conservation Areas. The Buildings of Townscape Merit include the Former Hotel and Former Bottling Plant incorporated within the development (discussed above) as well as the Jolly Gardeners Public House which is situated adjoining the application site on the north of Lower Richmond Road.

437 Notwithstanding the existing presence of utilitarian former brewery buildings and structures in views from the south, the increase in scale and massing of the scheme would be a step change in the setting of this part of the Mortlake Conservation Area and the Mortlake Green Conservation Area. This subsequently results in some harm, albeit less than substantial harm, to the character and appearance of the conservation area. This identified harm would be mitigated to a degree by the breaking down of the massing achieved partly by the introduction of the wide green link between Mortlake Green and the River Thames, and also through the stepping back of storey heights into the site. The high architectural quality of the proposal (demonstrated by the detailed component and suitably controlled by the Design Code for the outline component) would also be readily apparent in these close-range views. The presence of the proposed sports pitch floodlights would also have a visual impact on the setting on Mortlake Green Conservation Area, although given the limited hours of use proposed GLA officers consider that this would not be significant.

438 As such, GLA officers consider that less than substantial harm would be caused to the significance of the Mortlake Green Conservation Area, the Mortlake Conservation Area and a number of heritage assets within them. In GLA officers' view this harm is justified owing to the aspirations of the Site Allocation and Planning Brief for the site, which, as the Council recognises, would inevitably result in larger buildings being present in these settings.

439 Objections have been raised by Richmond Council to the revised scheme, regarding the impact of increased height of buildings fronting Mortlake High Street on the Former Bottling Plant, consisting of an amended modern roof form, as well as the impact of increased height to buildings 6, 7 and 8 in the backdrop of the Former Hotel Building when viewed from Mortlake Green.

440 Whilst the concerns raised in the Richmond Council consultation response are acknowledged, GLA officers consider that the changes to building heights fronting

Mortlake High Street would have a negligible impact on the visual interpretation of the retained Former Bottling Plant at street level, with the primary point of appreciation of this facade being its distinctive corner treatment at the roundabout intersection of Mortlake High Street and Sheen Lane, which will be largely unaffected.

441 By comparison with the scheme previously considered at Richmond Council's Planning Committee, the upwards extension of buildings behind the Former Hotel is considered by GLA officers to result in a simpler and less visually cluttered backdrop to the roof form of the former hotel building when viewed from Mortlake Green. In light of the quantum of development envisioned on the site by the Stag Brewery Planning Brief and Site Allocation, and the objectives of concentrating higher components of redevelopment on the eastern portions of the brewery site, it is considered inevitable that some development will be visible above the roofline of the Former Hotel Building in any redevelopment of the site.

442 The July and September 2020 amendments to the scheme have made minor alterations to the height and massing of the proposed cinema adjacent to the Jolly Gardeners Public House, with minor alterations to the facade detailing and ground floor activation treatments. The proposal continues to exhibit a step back from the pavement at the buildings south-western corner, ensuring that streetscape views are maintained to the eastern and southern facades of the public house. GLA officers are satisfied that the proposed interface of the Cinema with the pub will not result in adverse impact to the setting or context of the Jolly Gardeners Public House – a Building of Townscape Merit (BTM) – and as such this component of the scheme would cause no harm.

#### Conclusions on heritage impact

443 On the basis of the above considerations, GLA officers consider that the proposals would result in less than substantial harm at the lower end of the scale to the significance of the following heritage assets:

- Loss of some historic fabric in the Maltings Building (BTM within a Conservation Area) resulting from works necessary for its adaptation from industrial to community and residential uses;
- Loss of some historic building fabric (excluding retained portions of building facade) in the Former Hotel and Former Bottling Plant (BTMs within a Conservation Area);
- Demolition of the majority of former brick boundary walls (BTMs within Conservation Areas);
- Harm to the significance of the Mortlake Conservation Area owing to impact on setting from height and massing and to the setting of the Maltings Building (BTM) when viewed from Chiswick Bridge and Chiswick Bank;
- Harm to the significance of the Grade II listed residential properties situated on Thames Bank between Ship Lane and Chiswick Bridge, including Thames Cottage, Tudor Lodge, Thames Bank House, Leydon House and Riverside House owing to impact on setting from height and massing;
- Harm to the significance of the Mortlake Conservation Area and Mortlake Green Conservation Area and the Former Bottling Building and Former Hotel Building (BTMs) owing to setting impact from the south.

444 The scheme would also deliver the following heritage benefits:

- The adaptation and re-use of the Maltings Building with ongoing viable uses (including community facilities);
- The restoration of the most significant facades of the Former Hotel and Former Bottling Plant buildings, and their incorporation within the new development;
- Use of the retained portions of the Former Hotel Building in a newly proposed hotel, returning the historic use to the site.

445 In accordance with the NPPF, incidences of ‘less than substantial harm’ should be weighed against the public benefits of the proposal. GLA officers have attributed great weight to the heritage harm caused by the proposed development but consider that harm to be outweighed by its public benefits. Policy HC1 of the London Plan and Policies LP 3 and LP 4 of the Richmond Local Plan do not include such a balancing exercise and as such the proposals would be contrary to them (as well as parts of London Plan Policy D9 concerning heritage impact of tall buildings). Nonetheless, as required by the NPPF the balancing exercise must be carried out and this is discussed in the planning balance section located at the end of this report.

### Archaeology

446 The application site is situated within a designated Archaeological Priority Area, with potential interest relating to the following historical periods associated with the site:

- Prehistoric – Previous finds of Paleolithic and Mesolithic flintwork artefacts, along with finds of Neolithic, Bronze Age and Iron Age origin.
- Roman – No identified potential.
- Early Medieval – Potential evidence of agricultural activity and land division.
- Medieval - Former site occupation of a Church, Cemetery and the Archbishop of Canterbury’s Palace.
- Post-Medieval – A renaissance mansion associated with Thomas Cromwell, remains of the Archbishop of Canterbury’s Palace, evidence of village activity and occupation prior to assimilation into the brewery complex.
- Industrial age – Evidence of the sequential development of industrial brewing activities on the site from 1765 to present day.

447 As with the previous iteration of the scheme considered at Richmond Council Committee in January 2020, the revised proposals are supported by a Desktop Archaeological Assessment, which has informed contents of the submitted Environmental Statement. The submitted details demonstrate that potential damage to the archeological significance of the site resulting from works proposed to deliver the application proposals, is capable of being mitigated through the following measures:

- Implementation of a phased archaeological evaluation programme, following demolition and Site clearance, moving across the Site behind the demolition; and

- Implementation of further excavation work dependent upon the results of the evaluation.

448 The Greater London Archaeological Advisory Service (GLAAS) has reviewed the previous and amended proposals and confirmed that the revisions to the applications will not have any additional archaeological impact to that of the original scheme, which was supported. The findings of the desk based assessment are sound, and potential damage to the archaeological interest of the application site would be sufficiently mitigated by the above measures. Conditions of approval are proposed which secure archaeological mitigation measures as described above, and the scheme is acceptable in this regard.

### **Residential quality, including impacts on neighbouring residential properties**

449 Policy D6 of the London Plan outlines minimum space standards, sets out minimum requirements for private external space, ceiling heights, and requires the maximum provision of dual aspect dwellings. The Mayor's Housing SPG provides further detailed guidance on residential design quality and sets baseline standards, including units per floor per core, private external space, dual aspect and single aspect dwellings, and floor to ceiling heights.

450 Richmond Council's Local Plan Policy LP 35 sets out requirements for high quality housing, with reference to the Nationally Described Space Standards. Policy LP 8 requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties; covering issues of daylight and sunlight, overlooking, noise and disturbance, visual intrusion, enclosure, overbearing and other environmental impacts. The Council's Residential Development Standards SPD provides further guidance.

#### Internal space standards

451 For the detailed portion of Application A, all of the proposed residential units have been confirmed to either meet or exceed minimum space standards expressed in the nationally described space standards. All of the units would comply with the 2.5 metre minimum ceiling height standard set out in the London Plan. The majority of units do not exceed a maximum acceptable standard of 8 units per core, with the sole exception being the incidence of 9 units per core proposed in Building 2. Despite exceeding the number of desirable units per core by 1 unit, it is accepted that the design of Building 2 suitably ensures there are no long corridors, and this is considered a minor and acceptable occurrence. Having assessed the room layouts, GLA officers consider these would provide a high standard of accommodation. Compliance with the approved floorplans would be secured by planning condition.

452 For the outline component, the unit numbers proposed are based on meeting these residential quality standards, which is reflected in the Design Code, and would be assessed in detail through Reserved Matters Applications.

453 Overall, GLA officers are satisfied that the scheme performs well in terms of internal space standards, in accordance with London Plan Policy D6, Richmond Council's Local Plan Policies LP 8, LP 35 and the Mayor's Housing SPG.



## Dual aspect

454 The Mayor's Housing SPG states that development should minimise the number of single aspect units and avoid the provision of single aspect units that are north facing; contain three or more bedrooms; or are exposed to noise levels above which significant adverse effects on health and quality of life occur. Policy D6 of the London Plan states that development should maximise the provision of dual aspect units; and normally avoid the provision of single aspect units, which should only be provided where they provide an acceptable quality of accommodation in terms of passive ventilation, daylight, privacy, and avoiding overheating.

455 For the detailed components of Application A, a total of 6.8% of units are proposed as single aspect and north facing. Whilst the remaining number of north-facing single-aspect units is regrettable; additional measures to improve the amenity of the remaining north facing single aspect units have been incorporated, such as their positioning to enjoy attractive outlook and (where possible) views to the river and/or additional balconies.

456 For the outline component, the proposals are based on the aim to minimise single aspect units, which is reflected in the Design Code, and would be assessed in detail through Reserved Matters applications.

457 Overall, GLA officers are satisfied that the scheme performs well in terms of dual aspect, in accordance with London Plan Policy D6 and the Mayor's Housing SPG.

## Private external amenity space

458 The Housing SPG and Policy D6 of the Intend to Publish London Plan state that a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings, with an extra 1 sq.m. for each additional occupant; and the depth and width of outdoor space should be at least 1.5 metres. Paragraph 2.3.32 of the Housing SPG recognises that there may be exceptional circumstances where site constraints mean that it is impossible for private external amenity open space to be provided, in which case dwellings may be provided with additional equivalent internal living space.

459 In regards to the detailed part of Application A, the majority of residential units will meet or exceed the minimum requirement for private amenity spaces, through a mixed provision of ground floor amenity space, balconies and external roof terraces. Instances where private amenity space is not achieved are largely limited to residential units situated in the Maltings Building, where heritage considerations have made the installation of external balconies undesirable. Noting the heritage constraints relating the Maltings Building, as well as the significant contributions towards high quality public realm and accessible communal areas provided in the scheme, GLA officers consider that the detailed proposals are acceptable in terms of the private external amenity spaces.

460 For the outline component, the proposals aim to meet private external amenity space requirements, which is reflected in the Design Code, and would be assessed in detail through Reserved Matters applications. The Design Code secures a mandatory requirement for balconies sufficient to provide the minimum amount of amenity space required.

461 Overall, the private amenity space provision is acceptable in accordance with London Plan Policy D6, the Mayor's Housing SPG and Local Plan Policy LP 35.

#### Privacy, overlooking, outlook and sense of enclosure

462 London Plan Policies D3, D6, and D9 state that development proposals should achieve appropriate levels of privacy. The Mayor's Housing SPG states that design proposals should demonstrate how habitable rooms are provided with an adequate level of privacy in relation to neighbouring properties, the street, and other public spaces. It identifies that a minimum distance of 18–21 metres between habitable rooms can be used as a benchmark. Policy LP 8 of the Richmond Local Plan requires development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. In support of Policy LP 8, paragraph 4.8.8 of the Local Plan outlines a minimum distance guideline of 20 metres between habitable rooms for privacy reasons, reducing to 13.5 metres instances where at least one of the opposing walls contains no un-obscured windows or other design measures are adopted to ensure privacy and outlook are maintained.

463 In respect of the above guidance, it is noted that buildings within the detailed portion of the development are generally separated by a distance of 13.5 metres 'face to face', with reduced separations as low as 10 metres in limited instances between flank walls. These separation distances are consistent with those previously considered by the Richmond Planning Committee and are considered acceptable noting the variety of mitigating design measures incorporated to ensure suitable privacy is maintained between buildings.

464 To ensure privacy in instances of lessened building separation in the detailed components proposed, habitable rooms have been set back behind 1.5 metre deep balconies and balustrades to improve visual screening. Living rooms are generally concentrated in corner locations with dual aspects providing occupants the ability to obscure views from particular windows without a loss of total outlook. In instances where these measures are not achieved, the internal layout of buildings are coordinated so that residual overlooking is only between rooms of the same type and sensitivity (i.e. living rooms facing living rooms, and bedrooms facing bedrooms).

465 Within the outline portion of the proposals, future consideration at reserved matters stage is to be governed by a Design Code which incorporates specific measures for addressing instances of reduced building separation and subsequent potential privacy impacts. This includes instances where reduced setbacks between buildings flank wall elevations have been identified at Blocks 13, 15, 16, 17, 28, 19, 20 and 21. In these instances the Design Code secures that living rooms must be located to the corners of buildings for dual aspect views, instances of direct overlooking will be restricted to occur only between rooms of equal sensitivity (i.e. living room to living room), recessed facades must be applied to facing bedrooms to increase separation distances to a minimum of 13.5 metres, staggered windows should be used on facing elevations, restrictions are placed on projecting facade bays and balconies, and only dual aspect living rooms with alternative aspects are to be situated in these locations.

466 The design code also outlines a specific rule set governing the proposed angular relationship between buildings 18 and 19. In this instance future design must ensure that living rooms in this location are dual aspect and benefit from a primary view from

alternative elevations. Additionally, residual overlooking must only occur between rooms of equal sensitivity (i.e. living room to living room), recessed balconies should be utilised to provide additional screening, and layouts must ensure a minimum distance between bedroom windows of no less than 16 metres. GLA officers consider that the identified design code measures are sufficient to address privacy impacts between proposed buildings in the outline portions of the proposals.

467 It is noted that Buildings 19 and 20 are situated in relatively close proximity to the south-eastern boundary of the neighbouring flats situated at Reid Court, fronting Williams Lane. Notwithstanding this, privacy impacts on Reid Lane resulting from the proposals are considered to be negligible noting that distances of 21 and 14.8 metres between these buildings and Reid Court facade are maintained, and also noting that overlooked areas within this are primarily communal rear areas of limited sensitivity.

468 Properties at Parliament Mews are situated to the north of Block 20, with acceptable facade-to-facade distances of 18.5 metres achieved between these buildings and the outline proposals for Block 20. Notwithstanding the acceptability of inter-building privacy, it is acknowledged that concerns have been raised regarding Block 20's limited setback of 11 metres from the boundary of rear gardens to the neighbouring properties at Parliament Mews. This separation distance would however be similar to other building-to-garden distances in the locality and would be acceptable.

469 In respect to the neighbouring properties at Thames Bank (including Leydon House, The Old Stables, Thames Bank House and Aynescombe Cottage), it is noted that four-storey Buildings 21 and 22 are now proposed closer to the northern boundary of the application site than the previously proposed three-storey terraced homes in this portion of the site. Notwithstanding this, with a minimum 18 metres proposed facade-to-facade distance achieved between the new and existing buildings, the proposals are within the minimum guidance for separation between habitable rooms set by the Mayor's Housing SPG. Concerns raised during consultation stage regarding limited setback of buildings from neighbouring gardens of Thames Bank properties are acknowledged. However it is considered that further improvements to visual privacy are achieved through the retention of an existing large tree near the boundary separating the properties. In addition, it is considered that some further improvements may be achieved within the detailed design of these buildings, with the design code including options for inset third and fourth storeys. With this considered, the proposed arrangement for visual privacy in this location is acceptable.

470 Overall, GLA officers are satisfied that the scheme is acceptable in terms of privacy, overlooking, outlook, and sense of enclosure, in accordance with London Plan London Plan Policies D3, D6, and D9; Richmond's Local Plan Policies LP 8 and LP 35, and the Mayor's Housing SPG.

#### Daylight, sunlight and overshadowing

471 London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. The Housing SPG states that an appropriate degree of flexibility needs to be applied when using Building Research Establishment (BRE) guidelines to assess the daylight and sunlight impacts of new development on surrounding properties and within new developments, taking into account location, context, and broadly comparable

housing typologies found in London. Similarly, amendments to the NPPF (2019) state that planning authorities should take a flexible approach when applying daylight and sunlight guidelines, where these would inhibit making efficient use of a site and where an acceptable living standard would be achieved. While BRE guidelines do not form part of the development plan, they provide an industry standard method of assessment for daylight, sunlight and overshadowing issues and are generally relied on by planning authorities as a comparative benchmark for assessment purposes. Richmond's Local Plan Policy LP 8 requires that developments ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new developments and existing properties affected by new development.

*Internal (within the development)*

472 The July 2020 Scheme amendments were accompanied by a revised Internal Daylight and Sunlight Report prepared by EB7 Ltd. This report has assessed available daylight within units using layouts known for the detailed elements of the hybrid application. The assessment utilised the Average Daylight Factor (ADF), and Annual Probable Sunlight Hours (APSH) with reference to BRE guidelines. It is accepted that changes incorporated in the September 2020 scheme amendments would not alter assessment or findings provided in the July 2020 EB7 Report.

473 Findings of the EB7 analysis indicate that 86% of all rooms within the proposed buildings in the detailed portion of the scheme would meet or exceed BRE targets with respect to ADF. Whilst it is noted that there remain instances of non-compliance with BRE Guidance for ADF, it is accepted that the design of the scheme suitably maximises daylight within the main living areas of buildings, with only 21 of the 244 rooms identified below BRE guidance levels being main living spaces (Lounge Rooms / Kitchens / Dining Rooms). Given the scale and complexity of the proposed development, it is considered inevitable that a small number of areas may not achieve BRE guidelines. GLA officers consider such instances to be suitably limited and acceptable.

474 The analysis suggests that 62% of tested south-facing rooms within the detailed components of the scheme would meet BRE guidelines with respect to APSH. This is notably marginally below the levels achieved in the original scheme considered at Richmond Council Committee, which achieved 65% compliance with BRE guidelines. As with the original scheme, it is considered that the reduced level of ASPH is resultant from the broader design objectives for the development of the site, which seek to improve north-south connections between Mortlake and the River Thames and result in a higher portion of north-south oriented blocks. It is also considered that lessened levels of APSH conformity with BRE guidance are a feature of multi-block schemes in urban environments, such as that sought here. On this basis the level of ASPH is considered acceptable.

475 With respect to outline elements of the proposals, consideration has been given to the findings of the facade studies provided in appendix to the EB7 report. These notably demonstrate that high levels of daylight and sunlight will be achieved in the outline portions of the scheme, albeit with some areas of constraint identified along flank walls between blocks. GLA officers consider that identified areas of concern would be suitably capable of being addressed within the detailed design of the outline proposals, noting that analysis has been based on the maximum extent of outline parameter plans.

*External (impact on neighbouring properties)*

476 The revised Environment Statement addendum is accompanied by further Daylight/Sunlight analysis provided in respect of the July 2020 scheme amendments. This was also reviewed as part of the September 2020 scheme amendments, which found no significant changes from the findings from those relating to the July 2020 scheme amendments. The methodology of analysis is supported by GLA officers and findings conclude that, once the development is in place, the overall number of properties that experience significant effects on daylight and sunlight is low.

477 Notwithstanding the above, analysis against BRE criteria including Vertical Sky Component (VSC), No Sky Line Contour (NSC) and Average Daylight (ADF), has identified adverse impacts with respect to the following properties:

- Butler House
- 3-9 Richmond Road
- Parliament Mews
- Thames Bank Cottage
- Aynescombe Cottage
- Old Stable
- Thames Bank House
- Rann House
- 31 Vineyard Path
- 2 to 6 Williams Lane
- Reid Court
- Churchill Court House
- Jolly Gardeners Public House.
- Boat Race House

478 Analysis against BRE criteria for Sunlight in respect of Annual Probable Sunlight Hours (APSH) has found that the majority of properties will see no noticeable effect. Notwithstanding this, Boat Race House, The Ship Public House and Aynescombe Cottage would experience some impacts beyond BRE Guidance levels.

479 In respect to Butler House, findings demonstrate that 73% of the existing windows would see no change in daylight received at the window face. There are 17 windows which would experience reductions in Vertical Sky Component as a result of adjacent development. The majority of impacted windows are presently overhung by existing balconies which prevent the maximisation of VSC. Of the impacted windows, all but 1 are to rooms which are served by at least one other window which will not be impacted by the proposals. The one window which will suffer residual impact is notably a bedroom window and considered of lessened sensitivity to loss of daylight or VSC. On this basis the demonstrated impacts to Butler House are considered acceptable.

480 At 3-9 Richmond Road analysis demonstrates that none of the 16 windows would experience a change in VSC at the window face, and the majority of rooms (88%) would experience no noticeable change in daylight. As with Butler House, there is a single room impacted by minor daylight reductions which is a first-floor bedroom window. As a bedroom, this window is considered to be of lessened sensitivity to losses of daylight, and the losses predicted are notably at the lower end of the scale, with NSC analysis showing a predicted reduction of 25.6% (with 20% being the threshold for which changes become noticeable under BRE guidance). On the basis of producing only minor impact on daylight availability to a single room of lessened sensitivity, the impacts on 3-9 Richmond Road are considered to be minor and acceptable.

481 With respect to dwellings at Parliament Mews, details submitted demonstrate that 88% of windows tested would experience no noticeable change to either VSC or daylight. Notwithstanding this, 11 windows would experience minor to moderate reductions in VSC and 6 windows would experience minor to major impacts on daylight. All of the windows experiencing moderate or major impact on daylight availability are again bedrooms which, as discussed previously, are less sensitive to losses of daylight. It is also accepted that the proportionate losses of daylight resulting from the development result in-part from the high baseline conditions established at the existing site, with some impact inevitable from any redevelopment at the site of the scale sought by the Planning Brief. Noting that windows impacted by losses of daylight will generally maintain a reasonable residual VSC in the range of 24-28%, and further noting that proposed blocks 20 and 21 adjacent Parliament Mews are submitted in outline form and assessed at their maximum extents, it is considered that the level of impact on dwellings at Parliament Mews is acceptable, and liable to further improvements achieved through future Detailed Design and Reserved Matters considerations.

482 Analysis submitted with respect to Thames Bank Cottage demonstrates that there would be no noticeable change to VSC. Notwithstanding this, two rooms would experience minor impacts to daylight. It is accepted that the low degree of impact limited to two rooms is minor and acceptable, again noting that adjacent block 22 is an outline proposal which has been assessed at its maximum extents, and is likely to experience further design development which could lessen the minor impacts identified.

483 Analysis submitted with respect to Aynescombe Cottage and Old Stable demonstrates that, in each instance, no rooms would experience noticeable losses of daylight, and all except two windows would not experience any noticeable change in VSC at the window face. At both properties, the two affected windows serve a room which has other windows which remain unimpacted by the development. On this basis it is accepted that the proposals would result in negligible and acceptable impacts in terms of daylight and VSC. In addition, APSH analysis suggests that 2 windows in Aynescombe Cottage would experience APSH levels below target levels. Of these, one window is a first floor window to a room served by multiple other windows which achieve BRE Guidance. The remaining window serves a ground floor living room and only achieves BRE target levels during non-winter months. Whilst regrettable it is accepted that compliance with BRE target levels during winter months at which the sun is at a low angle are largely unavoidable. As such failure to achieve BRE target levels in this instance is considered acceptable.

484 In respect of Thames Bank House, the submitted details demonstrate that no windows would experience a noticeable change in VSC, and only one room would experience a minor noticeable change in daylight, which is acceptable.

485 At Rann House, details confirm that there would be no noticeable loss of daylight in any rooms resulting from the development. However, 25 windows (26% of those tested) are expected to see a noticeable loss of VSC at the window face. Analysis has confirmed that the proportionate impact on the VSC is substantially the result of self-limiting factors on the existing building at Rann House, namely the presence of projecting balcony overhangs. Given the proportionate changes in VSC are largely result of limiting features on the existing building at Rann House, and noting that the availability of daylight within rooms remains largely unaffected, the impact of the proposed development on Rann House is considered acceptable.

486 The property at 31 Vineyard Path is situated on the southern side of Mortlake High Street adjacent to the eastern portion of the application site. Adverse impacts are predicted to VSC in 10 windows and daylight in 9 rooms which front Mortlake High Street. Whilst these impacts are acknowledged, it is noted that the bulk of impacts are proportional owing to a high existing baseline condition established by the outlook of north facing windows towards an underdeveloped portion of the application site. Notwithstanding the high proportional change experienced at these windows, acceptable levels of residual VSC have been demonstrated with the proposed development and the impacts are considered acceptable.

487 Details submitted regarding the properties at 2-6 Williams Lane indicate that the majority (76%) of windows would experience no noticeable change in respect of VSC, with the 4 impacted windows experiencing only minor decreases in VSC. In respect of daylight, all but one of the tested rooms would also not experience noticeable change. It is understood that the single affected room constitutes a ground floor living / music room which experiences a significant adverse impact. Whilst this is acknowledged, it is understood that the impacted room is a secondary living space, with an unaffected primary living space situated within the rear elevation and remaining unaffected by the proposals. On this basis, the level of impact is considered acceptable.

488 Properties at Reid Court are situated adjoining the north-western corner of the application site, with submitted details demonstrating that there would be no noticeable impact on internal daylight levels resulting from the development proposals. Notwithstanding this, 9 windows are expected to experience a loss of VSC at the window face when compared to the existing baseline conditions. It is accepted that predicted loss of VSC in these windows is largely owing to high VSC levels in the baseline conditions of the existing site, and that reasonable levels of VSC (in excess of 20%) will still be retained. It is also noted that the adjacent blocks (18, 19 and 20) are outline elements of the scheme and impacts have been assessed against the maximum extents of parameter plans. On this basis, it is likely that further improvements can be achieved during future detailed design development at Reserved Matters Stage.

489 Churchill Court House is situated to the immediate north of properties at 2-6 Williams Street and submitted details demonstrate that 92% of windows would experience no noticeable change in VSC, and 88% of rooms no change in daylight as a result of the proposals. A factor in the proportionally higher losses of VSC and daylight to the 7 windows and 4 rooms affected is caused by the existence of balcony overhangs at Churchill Court House, a factor beyond the developments control. The limited nature of impacted rooms is considered to be reasonable and, as with discussion on properties at 2-6 Williams Street, it is noted that the adjacent development proposals are proposed in outline form and assessment has therefore been based on the maximum extent of parameter plans. It is therefore considered that further scope to reduce the limited

impacts identified can be achieved through the further detailed design development considered at Reserved Matters Stage.

490 With respect to the Jolly Gardeners Public House, analysis has notably only been submitted with regards to the residential components of the existing building in accordance with BRE guidance. This analysis suggests that 73% of windows and 75% of rooms would not see noticeable losses of VSC or daylight respectively. Of the three identified windows impacted, two are understood to serve a single bedroom situated on the first floor, and one is understood to serve a dual aspect bedroom on the second floor. The second floor bedroom is understood to have a secondary window aspect which is unaffected by the development, and to retain comparable existing daylight to the existing situation. The first floor room is the sole room identified as suffering a noticeable adverse affect on internal daylight. Notwithstanding this, it is accepted that BRE guidance places on minor significance on bedrooms impacted by daylight loss, owing to the less sensitive nature of use. On this basis, the single impacted bedroom is considered, on balance, to be acceptable.

491 In respect to Boat Race House, situated adjacent Bulls Ally on the eastern boundary of the application site, submitted details suggests that 69% of windows would experience no noticeable loss of VSC, and 63% of rooms no noticeable change to daylight. Notwithstanding this, 15 windows would experience a noticeable loss of VSC and subsequently 9 rooms would experience a loss of daylight spanning from minor to major in severity. Whilst these impacts are regrettable, they are considered to be largely unavoidable given the development objectives for the site and the existing outlook of the western windows and balconies of Boat Race House across an open area of the existing development site. The location and height of proposed Building 9 adjacent Boat Race House is consistent with the height, scale and location of development envisioned in the Stag Brewery Planning Brief SPG, and the limited depth of Bulls Ally between Mortlake High Street and the Thames will ensure some outlook is maintained towards the river and Towpath. For similar reasons APSH analysis indicates that 10 windows at Boat Race House would fall below BRE guidance targets for sunlight. However, 9 of these windows are notably bedroom windows and ascribed lesser significance for sunlight access under BRE guidance. The remaining window exhibiting APSH levels below target thresholds serves a dual aspect room and is thereby considered acceptable. On this basis the proposed impacts are considered to be acceptable in respect of Boat Race House.

492 Sunlight (APSH) analysis shows that a single window at the Ship Public House would experience levels below BRE Guidance targets. This window serves a room which contains secondary windows which satisfy APSH target levels and therefore the impact is considered to be acceptable.

493 The amended scheme analysis demonstrates that all amenity areas which surround the site would experience direct sunlight across more than 50% of their area for 2 hours or more on the 21<sup>st</sup> of March, or alternatively see a reduction of less than 20% from the existing level. On this basis adverse overshadowing of these amenity areas is acceptable and supported.

494 Overall the daylight, sunlight, and overshadowing impacts are considered to be acceptable, in accordance with the NPPF, London Plan Policy D6, Richmond Council's Local Plan Policy LP 8 and the Housing SPG. There would however be measurable



harm caused to 14 surrounding properties and this harm must be weighed in the overall planning balance.

### Noise and vibration

495 Paragraph 180 of the NPPF states that new development should ensure that potential adverse impacts resulting from noise are mitigated or reduced to a minimum; and noise levels which give rise to significant adverse impacts on health and the quality of life are avoided. Further guidance is provided in National Planning Practice Guidance (NPPG) and the Noise Policy Statement for England (NPSE) (2010).

496 While the NPPG and NPSE do not provide decision makers with technical or numerical values for categorising and assessing noise levels in decibels (dBs), industry standard guidelines set out in British Standard BS8233:2014 'Guidance on sound insulation and noise reduction for buildings' recommends that daytime noise levels do not exceed 35dB and night-time values in bedrooms do not exceed 30dB. This is aligned with the World Health Organisation recommendations set out in Guidelines for Community Noise (1998). With regard to external private and communal amenity spaces, British Standard BS8233:2014 recommends that external noise levels do not exceed an upper guideline value of 55dB.

497 Policy D14 of the London Plan states that development should manage noise to improve health and quality of life by avoiding significant adverse noise impacts; mitigating and minimising existing and potential adverse noise impacts within the vicinity of new development; separating new noise sensitive development from major noise sources through the use of screening, internal layout, set back distances; and where this is not possible, adverse effects should be controlled and mitigated by incorporating good acoustic design principles. The Mayor's Environment Strategy aims to reduce the number of people adversely affected by noise and includes policies and proposals to support this aim.

498 Policy LP8 of the Richmond Local Plan requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. Policy LP10 requires that environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and amenity of existing and new users or occupiers by way of noise and vibration.

499 The Environmental Statement includes a noise and vibration assessment, updated as part of the July and September 2020 amendments. The baseline assessment considers noise emissions from the surrounding environment, including road transport corridors adjacent to the Site. The residual effects after the completion of the development are anticipated to be insignificant, excluding minor temporary impacts from children's outdoor play associated with the operation of the new school. In this respect, it is noted that effects will be intermittent, limited to hours of school operation, and generally '*...within the range of normal conversation*' and therefore acceptable.

500 Subject to standard conditions limiting hours of operation for the school, playing pitches and commercial uses, GLA officers are satisfied that good residential quality, both within the scheme and at neighbouring properties, would be achieved in respect of noise. The proposals are acceptable in line with the NPPF; Policy D14 of the London Plan; and Richmond Council's Local Plan Policies LP8 and LP10.

## Air quality

501 Paragraph 181 of the NPPF states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, with further guidance in the Government's Planning Practice Guidance (PPG).

502 A core priority of the Mayor's Environment Strategy (2018) is to improve London's air quality and protect public health by reducing exposure to poor air quality, particularly for the most disadvantaged and those in priority locations such as Air Quality Focus Areas, and outlines a range of initiatives that seek to improve the capital's air quality over time, including the Ultra Low Emission Zone (ULEZ). Policy SI1 of the London Plan states that London's air quality should be significantly improved and exposure to poor air quality reduced, especially for vulnerable people. Policy SI1 states that development proposals should not create unacceptable risk of high levels of exposure to poor air quality and should ensure design solutions are incorporated to prevent or minimise increased exposure to existing air pollution. Policy LP 10 of the Richmond Local Plan also aims to improve air quality.

503 The Environmental Statement includes an air quality assessment, updated as a result of the July and September 2020 amendments.

504 GLA air quality officers have reviewed the submitted Air Quality Assessment and confirm that the approach adopted is broadly supported. In terms of air quality improvements at Chalkers Corner, the alternative junction intervention scenarios investigated (discussed in more detail in the 'Transport' section below) will lead to an air quality benefit compared to a scenario where junction improvements are not brought forward. In terms of air quality, the 'Chalkers Corner light' highway scenario delivers the most benefit to air quality (as per Appendix 10.4); and this conclusion has been given considerable weight in the assessment of the alternative options.

505 The entire development is considered to be air quality neutral in terms of transport emissions. However, when considered in its entirety, the development is not air quality neutral in terms of building emissions. Following previous consultation with the GLA, Development Area 1 (subject to a detailed planning application) has been assessed separately against the building emissions benchmarks. Alone, Development Area 1 complies with the building emissions benchmark and can be considered to be air quality neutral. However, an air quality neutral assessment of Development Area 2 will be required at reserved matters stage to ensure the scheme complies with London Plan Policy SI 1. It is emphasised that a scheme of mitigation will be required should the reserved matters application of Development Area 2 indicate that the development is not air quality neutral. The following conditions of approval and s106 obligations are therefore recommended:

- An air quality neutral assessment to be submitted with all reserved matters applications.
- No development shall take place until an Emissions Control Scheme (ECS) for the relevant Development Area or Plot within has been submitted to and approved.

- Emission rates of all installed combustion plant (CHP, boilers etc.) to meet the technical specifications outlined within the Air Quality Assessment.
- Prior to occupation of any building(s), details of the installed boiler of the relevant Development Area shall be submitted to and approved in writing by the Local Planning Authority.
- A scheme for each development area or plot detailing air quality impacts and mitigation with regard to phasing and construction traffic.
- An air quality positive assessment to be submitted with all reserved matters applications, in line with the requirements of London Plan Policy SI1 for masterplan schemes.
- Contribution towards air quality measures and resourcing towards compliance and regulation.

506 Subject to the above conditions and S106 obligations, the applications comply with the requirements of the NPPF, Policy SI1 of the London Plan, and Policy LP 10 of Richmond's Local Plan.

### Floodlighting

507 Policy LP9 of the Richmond Local Plan states that floodlighting, including alterations and extensions, of sports pitches, courts and historic or other architectural features will be permitted unless there is a demonstrable harm to character, biodiversity or amenity and living conditions.

508 The proposals incorporate floodlighting of the school sports pitch in order to enable it's use outside of daylight hours. Impact assessment of light pollution has been assessed within the Environment Statement (as Amended July 2020) and notes that Guidelines provided by the Institute of Lighting Professionals (ILP) suggests a pre-curfew limit of 10 lux, and post-curfew limit of 2 lux measured vertically at the window face of surrounding residential units as being acceptable levels of impact.

509 The lighting assessment provided notes that the lighting scheme has been designed in accordance with ILP guidelines, with the selected floodlights being Phillips 'OptiVision' floodlights which include internal louvres to control light trespass to surrounding properties. The adopted floodlighting design is proposed to be secured by condition, and would limit operational impact on surrounding properties to acceptable levels as demonstrated in the following diagram (note: blue areas denote impacts of 2 lux or below):

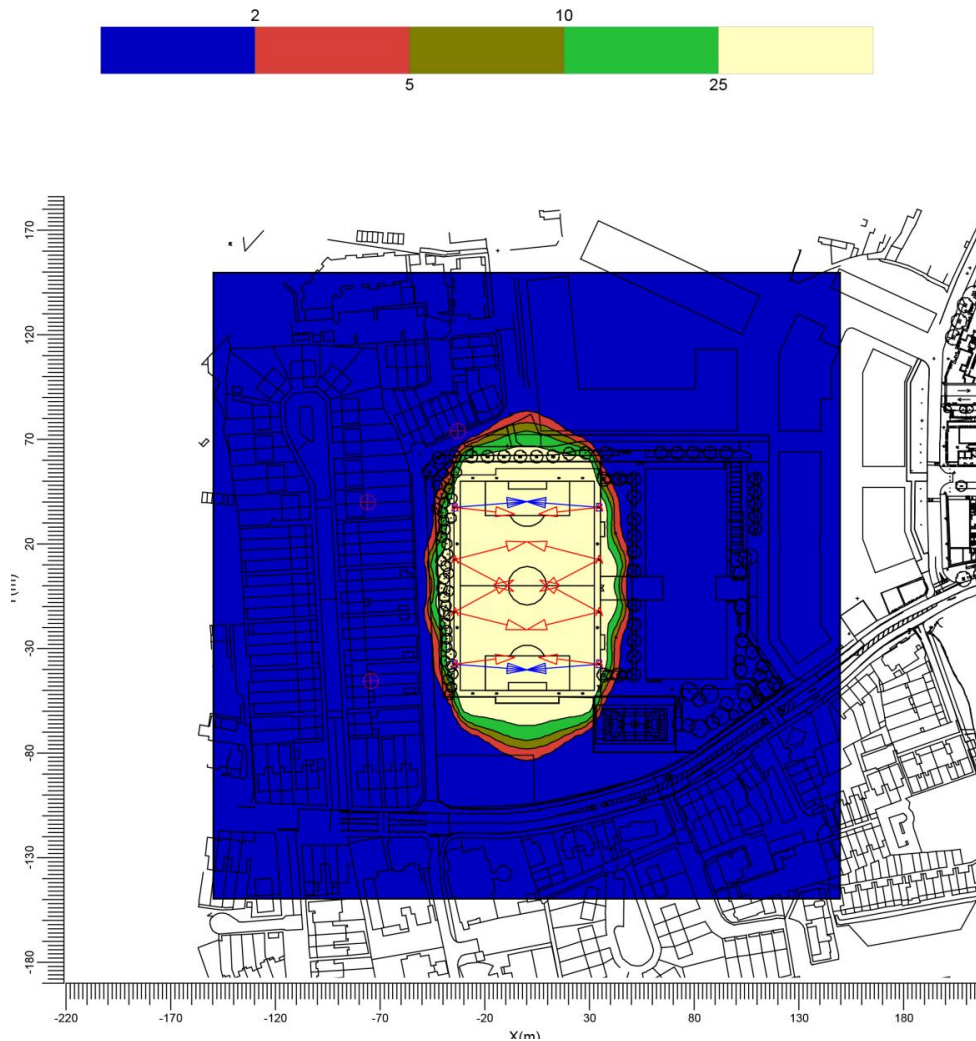


Figure 15.0: Predicted light spill intensity from proposed floodlighting (EB7 Drawing No 2201-LP03 – Light Spill Grid (Lux) (Class II)).

510 Subject to conditions of approval which secure suitable hours of floodlight operation and the type and design of floodlights in accordance with that detailed in the submitted lighting strategy, it is considered that proposed light overspill from the sports pitch lighting is acceptable in regards to Richmond Local Plan LP 9. Biodiversity impacts of the proposals are discussed separately under the sustainable development section of this report.

### Fire safety

511 Policy D12 of the London Plan seeks to ensure that development proposals achieve the highest standards of fire safety and to ensure the safety of all building users. Policy D5 requires as a minimum at least one lift per core to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

512 The applicant has submitted a Fire Safety Statement which demonstrates that fire safety has been considered at the earliest stage, and further development of a fire strategy will be based upon the principles established. Whilst GLA officers consider that

the submitted Statement is in accordance with Policies D5 and D12 of the London Plan in terms of their broad content, the fire safety strategy of the buildings would be considered in detail at a later stage outside of the planning process.

### **Designing out crime**

513 London Plan Policy D11 requires new development to provide legible, convenient and well-maintained movement routes and spaces which are well-overlooked and benefit from an appropriate level of activity, with private and communal spaces clearly defined to promote a sense of ownership.

514 As previously discussed, the proposals provide a series of new high-quality areas of public realm, with permeable linkages to the surrounding urban fabric. Ground floor mixed commercial uses ensure a diversity of activity, with good passive surveillance achieved from upper level residential properties. The Metropolitan Police's Designing Out Crime Officer has not raised objection at any of the consultation stages. It is considered that the proposal is acceptable in accordance with London Plan Policy D11.

### **Inclusive design**

515 London Plan Policy D3 requires all future development to meet the highest standards of accessibility and inclusion, and that the design process has considered how everyone, including those with disabilities, older people, children and young people, will be able to use the places and spaces that are proposed. London Plan Policy D7 requires that at least 10% of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings'; and that all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Planning Practice Guidance states that Local Plan policies for 'wheelchair accessible' (already adapted) homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, otherwise M4(3) dwellings should be 'wheelchair adaptable'. London Plan Policy T6.1 states that residential development should ensure that one disabled persons parking bay should be provided for 3% of dwellings from the outset, and a Parking Design and Management Plan, should demonstrate how an additional 7% of dwellings could be provided with a designated disabled persons parking space upon request should existing provision be insufficient. These requirements are reflected in Policies LP 30 and LP 35 of Richmond's Local Plan, which require development layout and realm to consider the needs of all, with 90% of all new build housing meeting M4(2) standards and 10% M4(3) standards.

516 For the detailed component of Application A (Development Area 1), the application documentation confirms that (10%) of homes would meet Part M4(3) of the Building Regulations, whilst the remaining 90% of units would meet Part M4(2) of the Building Regulations. Accessible homes for the outline element would be assessed as part of future Reserved Matters Applications. Mandatory requirements for accessibility and adaptability have been secured in the Design Code for the outline elements of the scheme, and conditions are recommended that would ensure that this level of accessible housing is secured in accordance with London Plan Policy D7.

517 The submitted Design & Access Statement confirms that areas of public realm, entrances and approaches to buildings are all designed around objectives to create safe, clear and accessible routes through the site. Slopes have been utilised instead of

stairs in the public realm and, in all instances, have been designed to a maximum gradient of 1:22. All entrances will have a level threshold approach.

518 The applications would achieve a high level of accessible and inclusive design and would comply with London Policies D3, D7 and T6.1; Richmond Council's Local Plan Policies LP 30 and LP 35; and the Accessible London SPG.

## Transport

519 Chapter 9 of the NPPF sets out the Government's aim to promote the use of sustainable modes of transport. When considering the transport implications of development proposals, the NPPF states that decision-makers should ensure that site specific opportunities available to promote sustainable transport modes have been taken up; safe and suitable access to site would be achieved for all users; and any significant impacts from development on transport network (in terms of capacity or congestion) or highways safety can be mitigated to an acceptable degree. Paragraph 109 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or where residual cumulative impacts on the road network would be severe. Paragraph 110 of the NPPF sets out additional criteria which should be addressed which includes pedestrian, cycle and inclusive access.

520 The Mayor's Transport Strategy (2018) (MTS) seeks to promote sustainable mode shift, reduce road congestion, improve air quality and assist in the development of attractive, healthy and active places. The MTS aims to ensure that by 2041, 80% of all Londoners' trips will be made on foot, by cycle or by public transport. Policy T1 of the London Plan requires development proposals to support this overarching aim, as do a range of other policies in the London Plan on 'Healthy Streets' (Policy T2), cycling (Policy T5), parking (Policy T6, T6.1-T6.5) and funding necessary transport mitigation measures (Policy T9). Policy T4 of the London Plan requires transport impacts to be assessed and mitigated and avoid road danger.

521 Richmond Council's Local Plan Policy LP 44 states that that the Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment. Local Plan Policy LP 45 requires new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land.

522 The Stag Brewery Planning Brief was adopted as a Supplementary Planning Document in 2011 and provides guidance on uses, layouts and design for the future planning applications for the redevelopment of the site. Key transport issues and principles included impacts on congestion, the possibility of a bus stopping/turning facility within the site, improved pedestrian and cycle permeability throughout the site and car and cycle parking provision.

523 The outcome of the Council's committee was a resolution to grant planning permission for the masterplan (Application A) and school (Application B) without the Chalkers Corner scheme (Application C). It was considered by the Council that adverse impacts to the highway network caused by the redevelopment can be adequately

mitigated without the need for the Chalkers Corner scheme. Issues with respect to transport were considered by the Council as having been satisfactorily addressed, subject to agreement of appropriate planning conditions and section 106 obligations to secure necessary mitigation measures. Transport does not feature in the Council's reason for refusal of Application C, which include trees, other open land of townscape importance and unneighbourly and air quality. The Mayor's Stage 1 comments concluded that further work on transport was required prior to determination by the council. These matters are considered as part of the submitted amendments to the scheme as set out below.

### **Site Access**

524 Vehicular access to the site remains as per the original application. Access to the eastern side of the site will be via Ship Lane and a new priority junction on Mortlake High Street immediately east of the entrance to the underground car park (opposite Vineyard Path). Access to the eastern side of the development will also be via Ship Lane with secondary access from Williams Lane. In addition a new access road is proposed from Lower Richmond Road immediately east of the proposed school which connects to both Ship Lane and Williams Lane. Access to the school is also from this new access road.

525 Vehicular routing to the development site is limited by the presence of the River Thames to the north and the railway line to the south. Vehicles will predominately access the site via Lower Richmond Road/ Mortlake High Street from Chalkers Corner or from Sheen Lane via the A205 Upper Richmond Road.

### **Highway Mitigation**

526 Following the refusal of Application C by Richmond Council's committee, four alternative options have been considered, with outcomes documented within the Transport Assessment Addendum Rev B dated July 2020 and TN041 Modelling Summary dated January 2021, to mitigate the impact of development traffic on both general traffic and buses on local roads, through Chalkers Corner and along Lower Richmond Road, and taking into consideration issues raised at committee.

#### *Option 1: No Change ('Do Nothing', Council Proposal)*

527 Following the Planning Committee meeting the Council requested that as an alternative to the Chalkers Corner scheme, a transport contribution was to be provided by the developer for a package of measures for the surrounding highway network. These include contributions for the following:

- Area Wide Traffic Management Contribution (£1,953,000)
- Highway Improvements Contribution (£950,000)
- Chalkers Corner Junction Contribution (£1,650,000)
- Main development Travel Plan and Travel Plan Bond.

#### *Option 2: Chalkers Corner 'Light'*

528 This option incorporates a previous TfL proposed scheme for the junction within the existing highway boundary. The key features of the design include the following:

- Provision for a left turn flare lane from Lower Richmond Road.
- Relocation of stop lines on A205 closer to the junction.
- Introduction of advanced stop lanes on Mortlake Road and Clifford Avenue South.
- Widening of area between junctions by relocating stop line by 2 metres.
- Removal of one tree and replacing with two trees.

#### *Option 3: Lower Richmond Road Bus Lane*

529 This option includes an indicative 350 metre westbound bus lane along Lower Richmond Road, with no other improvements at Chalkers Corner.

#### *Option 4: Chalkers Corner 'Light' & Bus Lane*

530 This option proposes a combination of the Chalkers Corner 'light' option and introduction of the bus lane. The bus lane requires the loss of approximately 36 parking spaces along Lower Richmond Road. However, it is considered that vehicles would be able to park in the bus lane outside of operational hours, enforced through new waiting and loading restrictions.

#### *Option 5: Chalkers Corner Scheme (Application C)*

531 This option proposes the previous Chalkers Corner scheme (Application C) that was refused at Committee.

#### Air quality

532 An air quality review of the Chalkers Corner options (ES Appendix I Replacement ES Appendix 10.4-Junction Assessment\_TN-1.4.1\_AQ) indicates that the none of the proposed junction options would have a significant effect on air quality. It is noted that Option 1 was not tested as it is unclear what changes are proposed to the highway network. The review concludes that the preferred option for the Chalkers Corner junction, in terms of air quality is Option 2.

#### **Trip generation**

533 The applicant has summarised their updated trip generation assessment within the Transport Assessment Addendum (TAA) Rev B dated July 2020, which has been undertaken in accordance with TfL's methodology. This concludes that the revised development is likely to generate an additional 2,559 two-way person movements during the weekday morning peak (0800 to 0900), and approximately 2,081 two-way movements during the evening peak (1700 to 1800). Of these, it is predicted that there will be 326 two-way vehicle trips in the AM peak hour and 225 in the PM peak hour. This represents a slight reduction in vehicle trips (-48 two-way trips in the AM peak hour and -7 in the PM peak hour) when compared to the original scheme due to the reduction in residential car parking provision and the removal of vehicle trips that could be generated by the existing use. The majority of additional movements are predicted to be public transport trips (1,094 two-way trips in the AM peak hour and 751 in the PM peak hour) and walking and cycling trips (1,032 two-way in the AM peak hour and 1,001 in the PM peak hour). The remaining trips are categorised as other methods of travel such as riverboat and air travel. This is consistent with a restraint-based approach to car parking along with the provision of a secondary school.



534 The secondary school trip generation assessment has been revised since the original submission as detailed in the TAA. Two TRICS survey sites have been added and an existing survey site was removed due to inconsistencies identified on closer analysis. Richmond Council have queried the robustness of the resultant secondary school trip generation assessment only predicting 985 arrivals in the AM peak hour, given the size of the school (1,260 pupils and 60 staff). Analysis of the survey data indicates a proportion of trips will arrive either side of the peak hour. This can be attributed to the provision of breakfast clubs and staggered start times, and in keeping with other schools surveyed.

## **Car parking**

535 Parking provision is closely linked to use, and car use generates a host of negative impacts which need to be managed and addressed, including congestion, noise, poor air quality, climate change, severance and road danger. Parking restraint and management is therefore essential in ensuring sustainable development and underpins mode shift.

536 A total of 500 car parking spaces are proposed on site; 407 spaces are provided for the residential uses equating to a car parking ratio of 0.33 spaces per unit (compared with 0.72 spaces per unit for the original application). Most of these spaces (400) are located within a basement car park. A further 15 spaces are proposed for the secondary school and 78 spaces for the non-residential uses on site. Parking for all uses is in accordance with London Plan standards and represents a reduction of 203 spaces from the original scheme.

537 There will be no parking provision at street level for any land use, with the exception of 7 spaces for the terraced town houses, 15 spaces for the school and delivery and servicing bays.

538 Residential disabled persons parking will also be provided in accordance with the London Plan, which requires provision for 3% of dwellings at the onset, with up to 10% provided should demand arise. The Council has requested a condition to secure the remaining 7% of residential disabled persons parking spaces and details as to how this will be triggered. Monitoring undertaken as part of the Car Parking Management Plan (CPMP), will ensure that the additional disabled persons car parking spaces will be provided should demand arise. The detailed CPMP, which is secured by condition, can be updated to reflect this. The CPMP will also need to detail that car parking spaces will be leased and not sold and how these spaces can be repurposed for sustainable uses, such as additional cycle parking, should supply be greater than demand. The applicant has agreed to include these provisions in the detailed CPMP and 20% of all car parking spaces will include active electric charging facilities with passive provision for all remaining spaces.

539 Three car club spaces with active charging facilities are proposed to be located within the red line boundary on Ship Lane and two years free car club membership will be secured through the section 106 agreement for all new residents. The exact location of the car club spaces will need to be detailed in the Car Parking Management Plan.

540 The importance of ensuring that parking from the proposed development does not overspill onto the surrounding road network has been considered. Parking surveys have established that existing on-street parking is well utilised, particularly overnight, although

there are spaces available at all times of the day on the surrounding road network. However, in order to prevent overspill car parking a £130,000 contribution is secured through the s106 agreement for the purposes of reviewing and implementing additional parking control zones in the area. The Council request that given the parking stress in the locality and low parking ratio, that appropriate mitigation is secured and implemented prior to first occupation.

541 The development will also be subject to an appropriate legal planning restriction whereby all future occupiers of the dwellings and commercial units will be exempt from parking permits within existing and future CPZs. This has been secured within the S106 agreement. However, the development is considered acceptable even if additional CPZs were not to come forward in the future, noting that this is a separate process outside of the control of the applicant and subject to consultation with residents.

542 The overall parking provision for the development is considered to be appropriate given the site's location and access to public transport.

543 The car parking provision accords with London Plan Policy T6, T6.1, T6.3 and T6.5 and Richmond Local Plan Policy LP 44 and LP45.

### **Healthy Streets and Vision Zero**

544 The Healthy Streets approach aims to create a high quality, attractive and inclusive environment in which people choose to walk, cycle and use public transport. The dominance of vehicles should be reduced by using design to ensure slower speeds and safer driver behaviour, in line with the Mayor's Vision Zero ambition. The proposed development will generate an increase in pedestrian and cycle trips to / from the site and the local area. The redevelopment of the site will see the creation of a new network of streets, which will significantly improve permeability and connectivity through the site. These streets are largely car free as the majority of car parking is located within basement car parks; creating a development where walking and cycling has priority over all other modes. Whilst servicing will occur on street level, access to the area will be controlled physically and by time restriction to minimise conflicts with pedestrians and cyclists.

545 A new "Green Link" is proposed which will run north-south through the site providing a link between Mortlake Green and the River for both pedestrians and cyclists. Richmond Council raised concerns over the previously proposed width of the new footway link on Mortlake Green, as this would result in the loss of green space. The applicant has agreed to reduce the width of this footway to 4 metres to address this. A new "high street" will run east- west parallel to Mortlake High Street and linking Ship Lane in the west with Mortlake High Street at the eastern end of the site, with limited vehicle access. A new pedestrian promenade will run parallel to the existing towpath, yet at a higher level above the flood level. This will be primarily a pedestrian route as well as providing an informal route for cycles. Ship Lane, which will continue as a public highway, and will include wider footways to make it a more attractive pedestrian route. To the west of Ship Lane, a new east-west pedestrian cycle route, with limited access for school service vehicles and buses, will link with Williams Lane to the west. For cyclists, the new internal routes through the site will connect to the existing cycle network beyond the site. In terms of the towpath works it is reiterated that the applicant has agreed to the original heads of terms which were agreed with Richmond Council.

546 To improve pedestrian safety, the existing zebra crossing on Lower Richmond Road west of Williams Lane is to be raised to encourage reduced vehicle speeds. Additionally, a signalised crossing is proposed on Lower Richmond Road west of the new access road to the secondary school to improve access for pupils needing to cross Lower Richmond Road. The existing signalised crossing on Lower Richmond Road is proposed to be relocated further east to the southern end of the Green Link, so that it is on the pedestrian and cycle desire line with Mortlake Green and Mortlake station. The crossing will be widened, and toucan facilities included. A new zebra crossing on Mortlake High Street is also proposed to connect to the new “high street”. Furthermore, a new 20mph speed limit is proposed to be enforced between Williams Lane and Bulls Alley including Sheen Lane, between the Mortlake High Street / Lower Richmond Road junction and the Sheen Lane level crossing. All of which will contribute towards the Vision Zero approach.

547 In addition, the applicant has undertaken an updated Heathy Streets Design Check, which includes the Chalkers Corner light scheme (Option 2) and the changes referred to above, on Lower Richmond Road and Mortlake High Street. This highlights pedestrian and cycle improvement over and above the existing situation.

548 To improve road safety, and pedestrian and cycle facilities, TfL has designed several proposed improvements within the A205 Upper Richmond Road / Sheen Lane junction. As the revised development proposal will generate additional vehicle, cycle and pedestrian movements through this area, a financial contribution of £228,878 towards the implementation of this scheme will be secured by the s106 agreement.

549 Overall it is considered that the layout of the development, and additional improvements outside the site’s boundary provides improvements for pedestrians and cyclists. These improvements will be delivered through a s278 agreement, for works on the public highway, or through the Public Realm Works, both of which are which will be secured through the s106 agreement. These improvements will contribute to the Mayor’s Healthy Streets agenda for encouraging active travel and mode shift away from the private vehicle. Therefore, GLA officers consider that the application would comply with London Plan Policies T2 and T4.

## **Cycle Parking**

550 The applicant is proposing a total of 2,582 long-stay cycle parking spaces on site, and a further 302 short-stay spaces for all elements of the revised development. Overall cycle parking is in accordance with London Plan standards. The majority of long-stay parking is located either at ground floor or within the basement areas. Short-stay parking will be located within the public realm close to building entrances. A condition requiring details of the type (a minimum of 25% of cycle parking provided should be Sheffield stands at the conventional spacing of 1.2 metres, a further 5% of the parking should be Sheffield stands spaced more widely (1.8 metres between stands) to accommodate larger cycles), location and number of cycle parking spaces and the provision of shower and locker facilities for the non-residential elements is secured along with a requirement to ensure that all cycle parking is designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS). A cycle hub for the non-residential uses to be located within the basement car park is secured by condition.

551 The Council has highlighted that whilst they support the increase in cycle parking for the site as a whole it is disappointing that there is no increase in the proposed level of cycle parking for the school, which could assist to encourage greater modal shift away from the car and fits with both the Mayor and the Council's promotion of Active Travel including School Streets. It is acknowledged that the school cycle parking provision accords with the London Plan cycle parking standards. However, cycle parking demand will be monitored through the school Travel Plan and further cycle parking could be provided should demand arise. An area reserved for additional cycle storage is secured by condition.

552 The applicant has safeguarded an appropriate area of land that can be converted to cycle hire, should TfL's cycle hire network be extended to the site in the future, this is secured by the s106 agreement.

## **Public transport**

### *Buses*

553 There are seven bus routes within walking distance of the site: 419, 190, 209, 355, R68, N22 and 969, although it is noted the 969 only operates twice a week. The proposed development is predicted to generate a total of 689 two-way bus trips in the AM peak and 282 two-way bus trips in the PM peak hour. The majority of the predicted bus trips are associated with the proposed secondary school (510 in the AM peak hour and 65 in the PM peak hour). TfL have assessed the uplift in demand based on pre-COVID capacity and conclude that additional buses would be required to accommodate the predicted level of demand generated by both the revised development and secondary school. The revised development would potentially require 3 additional return journeys in both the AM and PM peak hours; and a further 8 school services in the AM peak hour and 2 in the PM peak hour to accommodate secondary school demand.

554 Whilst it is currently unknown what specific routes will be enhanced, the bus network is constantly being reviewed and is able to adapt when demand increases, and travel patterns change. Improvements could include extra capacity on route 190 and by adjusting the 209 and/or 378 to serve Mortlake High Street and/or increasing the frequency on the 419, along with additional school services which will be based on the school catchment. A further extensive review of the bus network in the vicinity of the site will be undertaken once demand from the development starts to be generated and there is further clarity as to the re-opening of Hammersmith Bridge.

555 A financial contribution of £3,675,000 has been secured to enhance bus services for the revised development. Of this amount £2,555,000 is secured to enhance bus services for the proposed secondary school. The contribution will be secured by the s106 agreement.

556 The Council highlights that the bus contribution for the revised scheme is the same requested for the original scheme, and state that given the uplift in development quantum, this is questionable, and the development should make the necessary uplift in contribution to cater for the needs of the development. The updated secondary school trip generation assessment has resulted in a slight reduction in peak hour secondary school bus trips, this has been offset with an increase in residential bus trips as a result of the uplift in residential units. Therefore, the change in predicted bus trips between the original and revised scheme is negligible, and therefore the overall peak hour trips

remain largely unchanged. TfL has reviewed the revised figures and concluded that no additional bus contribution would be required, over and above that originally requested.

557 In order to facilitate the proposed development along Lower Richmond Road and Mortlake High Street, the applicant is proposing alterations to some bus stop locations along this corridor. TfL agree the principle of these changes, which will be secured via the s106 agreement.

558 During pre-application discussions for the original scheme, TfL were asked to investigate diverting route 209 to the Stag Brewery site. Whilst this was not considered to be a viable option, TfL did request that an area of land which can accommodate bus standing space for three vehicles and driver facilities should be safeguarded in the south west corner of the secondary school site to allow for future route extensions. Whilst safeguarding the site would be beneficial to a future bus network, it is unlikely to be needed in the foreseeable future and is not required to mitigate the impacts of this development. Therefore, TfL accepts the provision of a community park at this location instead.

559 Since the closure of Hammersmith Bridge, local bus services have been re-routed. Due to these changes, TfL has rechecked the site PTAL based on the latest changes to the bus network. The north western side of the site remains PTAL 2 however the eastern side of the site and the south western part of the site fronting Lower Richmond Road are now PTAL 3. It is noted that the north western side of the site is at the top of the PTAL 2 range so additional bus services which are required to accommodate the uplift in bus demand may have the potential to push the entire site to PTAL 3. The frequencies of Route 209 and the 378 are also likely to be increased to pre-bridge closure levels with the introduction of the ferry in late 2021, which should also result in a positive increase in bus access.

### *Rail*

560 Mortlake Rail Station and the trains which serve it are operated by South Western Railway (SWR). During the peak hours pre-COVID a total of 8 trains per hour towards central London call at Mortlake rail station, of these 4 are fast to London Waterloo, 2 are slower services to London Waterloo via Hounslow and 2 are slower services to London Waterloo via Kingston. The development is expected to generate 289 two-way rail trips in the AM peak hour and 374 in the PM peak hour. Recent rail improvements include the rolling out of new trains which have provided an increase in capacity from 8 carriages to 10 carriages on the network. In addition, Network Rail has recently realigned platforms at Waterloo, including bringing the old international platforms into use, to enable all 24 platforms to be used by SWR services which allows for an increase in services and reliability. Assuming all new rail passengers will be travelling towards London Waterloo in the AM peak on one of the 4 direct trains, this would equate to an additional 72 passengers per train or 7 passengers per carriage. This is a robust assessment as not all of these trips will be travelling to central London and a proportion of these trips will be alighting at Mortlake Station, not boarding. Furthermore, pre-COVID there were an additional 4 other peak hour services from this station, which have not been included in this assessment. No capacity concerns have been raised by Network Rail.

561 A platform width assessment has been undertaken which calculates the minimum width of a platform required to accommodate the number of people waiting on the

platform. This assessment indicates that even with the uplift in demand that there is sufficient platform width available.

562 Both staircase and footbridge comfort level analysis has been undertaken based on Network Rail (NR) guidance. This demonstrates that both the staircases and footbridge are within NR's requirements for both the present and future peak hour loadings.

563 Network Rail has raised no objections to the proposed development, in terms of station impact or capacity.

564 The development will result in an uplift in pedestrian, cyclists and drivers using the Mortlake level crossing on Sheen Lane. Sheen Lane experiences significant congestion and delays due to long barrier down time at the level crossing at Mortlake Station. Surveys undertaken in June 2016 recorded the barrier down time (average 45 minutes per hour) and queues. Strategic traffic modelling undertaken to support the original application has been rechecked as part of the revisions. The modelling shows only moderate increases in delay to traffic at the level crossing (up to 30 seconds) between the base year and future base year plus development in the AM peak hour, and a slight reduction in delay in the PM peak hour, which can be attributed to through traffic using alternative routes. However, in order to manage the impacts generated by the level crossing, it is proposed to extend the two lanes on the Lower Richmond Road arm of the Sheen Lane mini-roundabout to provide more capacity for vehicles heading from west to east across the roundabout. This will reduce the tendency for the eastbound traffic movement through the junction to become blocked when the level crossing barriers are down. It is also proposed to implement 'KEEP CLEAR' markings on the Sheen Lane mini-roundabout to free up the roundabout when the level crossing is down.

565 In addition to this a Network Rail Risk Assessment of this level crossing undertaken in 2017 highlighted that the main risk relates to conflicts between traffic and pedestrians and cycles at the crossing mainly as a result of driver frustration due to the long and variable barrier down times at this location. The assessment went on to conclude that the proposed development will have only a modest impact upon the level crossing. However, the applicant has agreed with Network Rail to fund the following footway and safety improvements which will be secured through the s106 agreement:

- Additional bridge signage;
- General improvements to the pedestrian bridge;
- Moving bollards back on both North and South Worple Way;
- Setting back vehicle stop lines;
- Improvements to Sheen Lane (as per the original development proposals).

## **Highways Impact**

566 The development is expected to generate a net increase of 326 two-way vehicle trips in the AM peak hour and 225 during the PM peak hour, including delivery and serving trips. Unlike the original assessment the revised assessment removed vehicle trips associated with the existing use on site to achieve a more robust assessment. A total of 152 of the predicted two-way vehicle trips are associated with the school in the AM peak hour and 23 in the PM peak hour. As previously discussed in the Trip Generation section, this represents a slight reduction in school vehicle when compared with the original scheme assessment due to the removal of one of the school sites and

replacing it with two more compatible school sites in terms of location, as a result of feedback at the Council's committee. This is considered to be a robust assessment as it is acknowledged that the school provider will discourage car drop-offs as much as possible and the school travel plan and associated bond will encourage sustainable travel patterns.

### *Option Assessment*

567 In order to test the impacts of the vehicle trips generated by the revised scheme, detailed traffic network and junction modelling has been undertaken. Whilst LINSIG modelling software was used to support the original planning application, VISSIM microsimulation modelling software was requested to be used for the revised scheme, due to its ability to accurately represent on-site conditions, including journey times impacts for both buses and general traffic and allows for more robust outputs to assess options. The modelling has been undertaken using 2017 traffic flows, as the emerging COVID situation meant more recent traffic survey data was not able to be collected.

568 Options 2 and 4 have progressed through the TfL VISSIM Modelling Audit Process (VMAP), to determine which is the most suitable highway mitigation for the revised development. The VMAP process sets technical benchmarks for traffic modelling to ensure that the process is transparent and robust. It is used to improve the consistency and quality of modelling and to ensure that the models are accurate and fit for purpose. All of the modelling undertaken to support the evaluation of options 2 and 4 have passed the VMAP process.

569 Option 3 Lower Richmond Road Bus Lane only was not considered to be a viable option to take through the VMAP process. Initial modelling showed that it gave little benefit to buses when implemented on its own due to its short length.

570 The Council maintain that Option 1, which includes a financial contribution towards wider highway improvements, transport planning initiatives to promote and support safe and sustainable travel and a lesser scheme at Chalkers Corner is required to mitigate the transport impact of the development. However, Option 1 was unable to be modelled due to the lack of detail of those initiatives and associated highway changes, and is therefore not supported as it has not been demonstrated that the package of measures would suitably mitigate the traffic impacts of the development. It is also noted that the applicant has not agreed to this mitigation package.

571 In terms of Option 4, the Council raises the following issues. Works would require Council's highway approval and amendments to Traffic Management Orders. Works could generate objections, given the loss of on-street parking (with no obvious alternative) and thereby there are no assurances. The Council also state that they are not confident that a bus lane along Lower Richmond Road would be supported given the potential impacts and the absence of any detail as to what buses TfL has planned for it.

572 Whilst Option 4 would result in the loss of 36 on-street car parking spaces, parking stress surveys undertaken to support the original application identify sufficient on-street capacity to accommodate 36 spaces at any time of the day, within the immediate vicinity of the on-street spaces that would be lost.

573 The modelling undertaken has highlighted the journey time benefits of the bus lane for existing bus services, particularly the route 419. Although not identified by the modelling due to its later addition, bus route 533 would also benefit from the bus lane, which was introduced when Hammersmith Bridge closed. Whilst TfL has not identified specific bus service improvement that will support this application, they have identified the number of additional peak hour services required to accommodate the uplift in demand (11 in the AM peak hour and 5 in the PM peak hour) and all of these services will either access the site from Lower Richmond Road or Sheen Lane. It is therefore a reasonable assumption that at least half of the new services proposed would benefit from a bus lane on Lower Richmond Road.

574 The Council highlights that it is unclear how Options 2 and 4 in the revised scheme provide any greater assurances than Option 1, proposed and accepted by the Council as an alternative to the unacceptable Chalkers Corners scheme (Option 5). The key differences are that Options 2 and 4 have been developed to outline schemes which have allowed both options to be modelled, which subsequently provides an accurate assessment of each option in terms of impacts on street.

#### *Preferred Mitigation Option*

575 Analysis of the options modelled indicates that both Options 2 and 4 mitigate the proposed development at the Chalkers Corner junction with regards to journey times and network performance for general traffic in comparison with the proposed development scenario without any highway mitigation. However, bus journey times along Lower Richmond Road, improve in Option 4 with the introduction of the bus lane.

576 In terms of overall network performance, average delay increases significantly in the 2031 Future Base Year scenario due to background traffic growth. The introduction of this proposed development (without mitigation) has a relatively lesser impact, particularly in the PM peak. An increase in average delay of 48 seconds per vehicle has been observed in the AM peak. The highway mitigation proposals Option 2 and Option 4 provide an improvement on the overall operation of the Chalkers Corner junction by reducing the average delay and total latent demand. The results for both Options 2 and 4 are broadly similar in terms of Network Performance Statistics.

577 A comparison of the public transport journey time results indicates that there are significant improvements to bus journey times with highway mitigation Option 4 for route 419 which operates along Lower Richmond Road. The results indicate a 54 second improvement to the 419 southbound in the AM peak hour and a 219 second improvement to the 419 northbound in the PM peak hour in comparison with the proposed development scenario without any highway mitigation. Bus journey times for the remaining bus routes which don't use Lower Richmond Road are broadly similar for Options 2 and 4.

578 A comparison of the general traffic journey time results indicates that there is an overall benefit at Chalkers Corner Junction in respect to general traffic journey times with both mitigation proposals Options 2 and 4. The greatest benefits are to general traffic journey times along the Lower Richmond Road section between Mortlake Roundabout and Chalkers Corner Junction in the PM peak period. For both highway mitigation Options 2 and 4, it has been possible to reallocate green time to other movements through Chalkers Corner junction and provide better overall junction balance



in terms of general traffic journey times. However, a slight increase in journey times are noted on other approach arms to Chalkers Corner junction with the introduction of the proposed development.

579 The modelling results highlight that either of highways mitigation Options 2 or 4 are required to mitigate the general traffic impacts of the development. Whilst the general traffic journey times and network performance results are comparable between the two options, the bus journey time improvements for route 419 are significantly better for Option 4. However, TfL acknowledge Richmond Council's concerns with the implementation of Option 4 which would require the removal of 36 on-street car parking spaces, and the implementation/alterative of Traffic Management Orders with the uncertainty that entails.

580 TfL therefore support the implementation of Option 2 to mitigate the highway impacts of the development. However, should bus demand from the development not meet the predicted mode share monitored through the Travel Plan or predicted delay for buses becomes significant with the additional buses provided for the development, a Sustainable Transport Fund has been secured which will allow the review and potential implementation of the bus lane if considered necessary to maintain the reliability of bus services along Lower Richmond Road and to ensure buses are a viable alternative to the private car. The implementation of which would still require the agreement of Richmond Council. This is discussed in more detail in the Travel Plan section.

581 It is important to note that both highway mitigation options will not create additional capacity beyond mitigation of future year growth and development demand.

### **Hammersmith Bridge Closure**

582 Since the original planning application was submitted Hammersmith Bridge has been closed to both vehicular traffic and pedestrian and cyclists. Furthermore, all river traffic under the bridge is also prevented. All highway modelling work undertaken to support the planning application has been based on traffic data obtained prior to the closure of the bridge. As detailed in the Highway Modelling section, robust updated survey data could not be collected due to COVID. TfL has been closely monitoring the impact of the bridge closure; the results indicated an initial increase of flows at Chalkers Corner. To mitigate this, TfL made changes to the signals at Chalkers Corner and others along the A316 to manage the new demand and the flows at Chalkers Corner were starting to return to pre-bridge closure levels prior to the impact of COVID.

583 TfL has also undertaken a comparison of yearly average traffic count data between 2017 and 2019 for the weekday 3-hour peak periods of 0700-1000 (AM) and 1600-1900 (PM), at three separate locations. The results indicate the following.

- A316 Clifford Avenue/Great Chertsey Road - Average annual weekday flow counts for the A316 show fluctuation in flows between +2% and +12% in the AM and +4% in PM peak. The maximum difference accounts for 119 extra vehicles per period.
- A205 Mortlake Road (north of Chequers Corner) - Average annual weekday flow counts for A205 show fluctuation in flows between -10% and +11% in the AM peak and -5% and +5% in the PM peak. The maximum difference accounts for 60 extra vehicles per period.

- A205 Upper Richmond Road - Average annual weekday flow counts for A205 west of Priory Lane show flow fluctuation between -10% and +11% in the AM -5% and +5% in PM peak. The max difference accounts for 76 extra vehicles per period.

584 In addition to the above, traffic count data was collected by an independent traffic survey company on behalf of the applicant on the 27 June 2017 and 2 July 2019 on all approaches to Chalkers Corner. Peak hour analysis of this data indicates that whilst there has been an increase in traffic between 2017 and 2019, the overall increases in both peak periods are less than 1.5%.

585 Therefore, whilst the closure of Hammersmith Bridge has resulted in some increases in traffic within the vicinity of the site, the increases are not considered to be significant and would not change the outcome of the modelling. It is considered that Option 2 would continue to mitigate the highway impact of the development regardless of the opening of Hammersmith Bridge. The applicant will be required to undertake further highway modelling to inform the Option 2: Chalkers Corner scheme detailed design and s278 agreement. New traffic survey data will be required at this time, to inform this assessment.

586 Since the bridge closure, TfL has also been reviewing and monitoring capacity and demand on the existing bus network. As a result of the initial closure, bus route 355 was introduced to maintain an accessible link between the north and south sides of Hammersmith Bridge. Route 419 was extended from Castelnau to Roehampton and increased in frequency to compensate for the withdrawal of route 72 between Hammersmith and Roehampton. Route 378 was also created to link Mortlake and Barnes with Putney Bridge, the nearest alternative London Underground station for passengers in the Barnes area. When the bridge closed to pedestrians and cyclists, demand fell on routes 33, 209 and 419 and demand increased for routes 190 and route 533. As a result, the frequency of the 533 has been increased. The network will be reviewed again when the proposed ferry linking the north and south side of Hammersmith Bridge opens.

587 Richmond Council raised initial concerns about the impact of the bridge closure on construction traffic. The applicant has demonstrated that only a small proportion of construction traffic would have been routed via Hammersmith Bridge which the Council now accept. However, the Council remain concerned about construction traffic mixing with greater levels of general traffic as a result of more general traffic using Chalkers Corner and Chiswick Bridge due to the closure of Hammersmith Bridge. The applicant has identified that the peak year of construction is likely to be 2023, which will generate 164 daily two-way trips. Where possible, construction traffic will avoid peak hours, so only a small proportion of these trips would be undertaken in the AM and PM peak period. At this time, the development is also predicated to be generating 76 two-way trips in the AM peak hour and 12 in the PM peak hour. Conservatively assuming half of the two-way daily construction trips travels in each peak period, which is unlikely, the total vehicle movements could generate 158 two-trips in the AM peak hour and 89 two-way trips in the PM peak period. This is significantly less than the predicted peak hour vehicle trips when the development is fully occupied. It is appreciated that construction vehicles are significantly larger than standard vehicles but given the number of vehicles is significantly less than modelled, it is considered that this can be accommodated on the highway network. Furthermore, it has already been demonstrated

the closure of Hammersmith Bridge has not had a material impact on traffic flows at Chalkers Corner.

### **Travel planning and monitor and manage**

588 An overarching Framework Travel Plan, draft Residential Travel Plan and School Travel Plan have been submitted and will be used as the basis for full Travel Plans to be prepared for the development prior to occupation. Richmond Council has requested that the School Travel Plan should include more ambitious targets in order to deliver a car free school and this should be reflected in the detailed final version. Submission and approval of the detailed final versions will be secured, monitored, reviewed and enforced through the S106 agreement. The applicant has agreed to the provision of a Travel Plan bond for the school and this will be secure through the s106.

589 In order to further encourage active travel and to ensure that the development achieves the strategic mode share targets (75% for walking, cycling and public transport) required for outer London, a monitor and manage approach is proposed during the phased build out of the development. This will ensure there is the flexibility to respond to any uncertainty generated by COVID, the Hammersmith Bridge closure and ULEZ. Each phase of development will be monitored against key indicators and targets which will be agreed by the applicant, Richmond Council and TfL. This will include predicted mode share as identified in the travel plans and could also include bus journey times. If the monitoring highlights that key indicators and targets are not as forecast, this can be managed through the implementation of measures/actions to address this at each phase of development. A Sustainable Travel Implementation Fund will be secured up to a capped value of £350,000. This will allow for the implementation of measures, which could include but is not limited to the following:

- Implementation of a bus lane along Lower Richmond Road (Option 4). This would protect bus services from bus journey time delays, as well as make bus use more attractive and increase bus mode share.
- Cycle infrastructure review and implementation. This could include physical infrastructure as well as softer measures such as training.
- Pedestrian infrastructure review and implementation.

### **Delivery, servicing and construction**

590 A Framework Delivery and Servicing Management Plan (DSMP) has been submitted in support of the application and will form the basis of the detailed DSMP. The revised development is predicted to generate 606 two-way daily delivery and servicing vehicle trips. Of these 67 two-way are within the AM peak hour and 33 in the PM peak hour. On-street loading bays are located throughout the site. It is proposed that all deliveries, servicing and drop-offs/pick-ups will be managed to ensure the proposed designated areas are sufficient to meet the needs of the mix of land uses within the development proposals. A concierge service will also be available to private residents 24/7 and located within each block containing private residential units. A Delivery Management System (DMS) will be used to manage the loading bays for the non-residential uses.

591 Both the Council and TfL agree that the deliveries and servicing arrangement proposed are acceptable and in accordance with London Plan Policy T7. The proposals are also in accordance with Richmond Local Plan Policy LP 45. Furthermore, a detailed Servicing and Delivery Management Plan (DSMP) has been secured by condition and should detail how delivery and servicing movements will be controlled, managed and adhered to by all occupiers. Richmond Council has indicated that they would support the requirement for a Waste Management Plan setting out in more detail how waste would be managed on site. This requirement has also been secured by condition.

592 London Plan Policy T7 promotes the provision of Construction Logistics Plans (CLP) and membership of the TfL Fleet Operators Recognition Scheme (FORS), to minimise the impact and safety risks of construction activities on people and the transport network. A Draft Construction Environment Management and Logistics Plan has been submitted with the application and a detailed version will be secured by pre-commencement condition. Careful consideration of construction routes and access will be required as part of the detailed plan to minimise disruption. Where possible construction traffic will avoid peak hours.

593 The applicant has considered whether the river could be utilised for logistics during the construction phase. Whilst a number of constraints have been identified in respect of river use, a River Transport Feasibility Study will be carried out to identify whether there is any scope to use the river for construction and overcome the constraints identified, this has been secured by condition. This will now be subject to Hammersmith Bridge re-opening.

### **Conclusion on transport**

594 The layout of the development provides a significant amount of new public realm and will allow permeability into the site for pedestrians and cyclists encouraging sustainable travel. The revised scheme includes a significant reduction in residential car parking from that originally proposed, and is considered acceptable in this location, and includes a package of transport improvements to ensure sustainable modes are highly attractive. The proposal would not result in any highway or pedestrian safety concerns subject to conditions and the completion of a s106 agreement. Subject to a suitable framework of controls and mitigation as identified above being secured through the s106 agreement and use of appropriate planning conditions, the transport impacts of this development are acceptable and in accordance with the NPPF, strategic and local transport policies in the London Plan (Policies T1, T2, T4, T5, T6, T6.1, T6.2, T6.3, T6.5, T7 and Richmond Local Plan Policies LP 44 and LP 45).

## **Environment and Climate Change**

### **Energy**

595 Policy S12 of the London Plan requires development proposals to minimise carbon dioxide emissions to meet the Mayor's targets, in accordance with the energy hierarchy, which is reflected in Policies LP 20 and LP 22 of the Richmond Local Plan.

- Be lean: use less energy;
- Be clean: supply energy efficiently;
- Be green: use renewable energy.
- Be seen: monitor and report on energy performance

596 Policy SI2 of the London Plan also requires calculation of whole life-cycle carbon emissions.

597 Applications for major development are required to meet the zero-carbon target, with major development expected to achieve a minimum on-site reduction of at least 35% improvement beyond Part L 2013 Building Regulations, with any shortfall required to achieve the zero carbon target secured via a carbon off-set payment.

598 Policy SI2 of the London Plan includes the expectation that energy efficiency measures alone should account for a minimum of 10% of the reductions in carbon dioxide emissions for residential development and 15% for non-residential development.

599 The applicant has calculated the following overall carbon emission savings for each of the energy hierarchy:

<b>Application A (Development Areas 1 and 2)</b>		
	<b>Regulated Carbon Dioxide Emission Savings</b>	
	<b>Tonnes/Year</b>	<b>(%)</b>
Be Lean	169	8.5%
Be Clean	0	0.0%
Be Green	555	28%
<b>Total</b>	<b>724</b>	<b>36.5%</b>
<b>Application B (School)</b>		
	<b>Regulated Carbon Dioxide Emission Savings</b>	
	<b>Tonnes/Year</b>	<b>(%)</b>
Be Lean	2	1.4%
Be Clean	0	0.0%
Be Green	77	57.7%
<b>Total</b>	<b>79</b>	<b>59.1%</b>

Table 19.0 – Collated Carbon Emissions Savings (Source: Energy Statement Addendum, Revision D – September 2020).

600 Carbon offset contributions to be secured in the s106 agreement have subsequently been calculated as at £95 per tonne year with residential and non-residential uses offset to 100% (zero carbon) as per London Plan 2021 and Energy Planning Guidance requirements.

Whole Site (Application A & B)		Carbon Offset (tonnes)	Cost at £95 per tonne
Development Area 1 (Application A)	Annual Offset (residential)	700	£1,995,000
	Annual Offset (non-residential)	336	£957,600
Development Area 2 (Application A)	Annual Offset (residential areas)	227	£646,950
	Annual Offset (non-residential)	N/A	
School (Application B)	Annual Offset (non-residential)	55	£156,750
Total Carbon Offset		1,318	£3,756,300

Table 20.0: Collated Carbon Emissions Savings (Source: Energy Statement Addendum, Revision D – September 2020).

601 When considered at Stage 1, concern was raised with the original scheme regarding the use of multiple energy centres, and further justification for the use of CHP technology was required. Subsequently, prior to consideration of the original scheme by Richmond Council, an approach was agreed between the applicant, Richmond Council and GLA officers, whereby conditions securing the provision of a single energy centre on the completion of the development by the following means were adopted:

- A temporary on-site energy centre of gas fired boilers for Development Area 1 would be provided on commencement of that Development Area.
- A single energy centre will be provided on commencement of Development Area 2 providing a single connected heat network for both Development Areas 1 and 2.

602 The applicant's Energy and Sustainability Statement has since been updated with an Addendum as part of both the July 2020 and September 2020 application amendments. The applicant has provided detailed carbon emission estimates for each Development Zone for the alternative Low or Zero Carbon (LZC) heating solution. These estimates have been calculated in line with energy assessment guidance requirements and demonstrate that the reserved matters elements are expected to meet London Plan targets for carbon emission reduction, which is welcomed.

603 It is expected that this proposed approach is adopted for the future reserved matters applications provided that the technical constraints outlined in the addendum are overcome. Where technical constraints do inhibit the adoption of this alternative strategy, robust evidence will need to be provided within the reserved matters submission and. In particular, the assumptions of plant efficiencies outlined within the addendum are thought to be optimistic and the future reserved matters submission must ensure that final emission calculations are achievable, this will need to be supported by:

- an estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development;
- details of how the SCOP 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).

604 Conditions of approval are proposed which secure the applicant's commitment to undertaking a full feasibility study of all heat pump opportunities within the reserved matters application for the outline portion of the site when this comes forward. Ensuring all potential heat pump sources and configurations include details such as:

- Energy generation from LZC energy source each year.
- Carbon dioxide savings from LZC energy source per year.
- Life cycle cost of the potential specification, accounting for payback.
- Local planning criteria, including land use and noise.
- Feasibility of exporting heat/electricity from the system.
- Any available grants.
- All technologies appropriate to the site and energy demand of the development.
- Reasons for excluding other technologies.
- Possible connections to new sources of heat or power with the potential to export heat or power to the development.

605 The applicant has also provided a whole life-cycle carbon emissions calculation, which is supported in line with London Plan Policy SI2.

606 Overall, subject to the conditions and s106 obligations recommended, the carbon reductions accord with the requirements of London Plan Policy SI2, and Richmond Council Local Plan Policies LP 20 and LP22.

### **Flood risk, sustainable drainage and water efficiency**

607 Paragraph 163 of the NPPF states that where appropriate, planning applications should be supported by a site-specific flood-risk assessment, which is reflected in London Plan Policy SI12. The NPPF also states that major development should incorporate sustainable drainage systems which is reflected in London Plan Policy SI13. Richmond Council's Local Plan Policy LP 21 outlines an intention to guide development away from areas of heightened flood risk, whilst avoiding contributions towards sources of flooding, taking into account climate change. It also includes requirements to maintain the integrity of flood defences, including setting buildings away from the tidal Thames.

608 The main application site is situated within Flood Zone 2 (in its north-western portion) and Flood Zone 3 (the remainder of the site). Identified flood risk is primarily tidal given the site's location immediately adjacent the River Thames, although portions of the site are also subject to elements of surface water and ground water flood risk. The site is protected by River Thames tidal defences including the Thames Barrier and a combination of protective boundary walls and buildings (the Maltings) forming flood defences along the site's river frontage.

609 The Richmond Planning Committee Report in January 2020 acknowledged that the previous iteration of the scheme satisfied the requirements of the Environment Agency, the Lead Local Flood Authority and the London Plan in respect of flood risk and drainage.

610 As with the previous scheme, the current revised proposals involve alterations to existing river boundary walls and new boundary walls. Where flood defence walls are being altered or removed, new defences are proposed.

611 An amended Environmental Statement has been provided accounting for the July 2020 and September 2020 revisions of the scheme. These have included a Revised Flood Risk Assessment (FRA) prepared by Hydro-Logic Services. The revised FRA concludes that:

*“...the proposed development will provide residential accommodation plus related activity at a safe level. The drainage strategy has demonstrated that this will lead to a reduction in peak rates of runoff from the site. The provision of elevated living accommodation with a range of access/egress routes will provide benefits to the local residents under flood conditions, as well as a refuge in times of extreme flooding. The proposed development is considered to be in accordance with the NPPF, LBRuT guidelines and the London Plan.”*

612 The Environment Agency do not raise any concerns with the amended scheme on flood risk grounds, subject to the following conditions:

- Adherence to the Flood Risk Assessment
- Inspection and maintenance of flood defences
- Scheme for site contamination
- Site contamination risk assessment scheme
- Contamination identification and remediation strategy
- Verification Report (contamination and remediation)
- Ground water infiltration
- Piling restrictions

613 A surface water drainage strategy has been submitted as part of the Environmental Statement (ES), and updated in the ES Addendum taking account of the July and September 2020 amendments. The strategy provides an assessment of existing runoff rates, and post-development discharge at greenfield rate, with a reasonable mix of SuDS measures. Compliance with the strategy will be secured by condition.

614 The proposed dwellings will have a maximum indoor water consumption of 105 l/person/day, which is in line with the optional standard in Part G of the Building Regulations. This would be subject to conditions.

615 The GLA flood risk and drainage officers consider the proposals acceptable subject to the mitigation recommended. The Council’s Lead Local Flood Authority Officer raised no objection to the proposals. Subject to the recommended conditions, the proposal accords with the NPPF, London Plan Policies SI5, SI12 and SI13; and Richmond Council’s Local Plan Policy LP 21.



## **Sustainable design and construction**

616 Although the London Plan provides no specific requirements in relation to BREEAM, Richmond Council's Local Plan Policy LP 22 requires new non-residential buildings over 100 sq.m in area to meet the BREEAM 'excellent' standard.

617 The July and September 2020 amendment documentation confirms that the proposal will be designed and constructed to achieve BREEAM 'excellent' and to meet the water consumption requirements of Policy LP 22, which are proposed to be secured by condition. The Council has raised a concern over the absence of a Sustainable Construction Checklist, which is a requirement of Policy LP 22. GLA officers note that the matters are already covered in the Sustainability Statement so a separate document is not required.

618 The proposals therefore accord with the NPPF; Policy SI2 of the Intend to Publish London Plan; and Policy LP 22 of the Richmond Local Plan.

## **Trees, Biodiversity and Urban Greening**

### Trees

619 Policy G7 of the London Plan requires development proposals to ensure that, wherever possible, existing trees of value are retained. Where planning permission is reliant on the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees which are removed. New development should include the planting of new trees, particularly large-canopied species.

620 These aims are similarly reflected in Policy LP 16 of the Richmond Local Plan, which resists the loss of trees. In circumstances where the loss of trees is unavoidable, this should only be undertaken where there are adequate replacement plantings, or a financial contribution is secured in line with the monetary value of the existing tree. New trees should be of a suitable species for the location, and all trees must be adequately protected during the construction phase of new developments.

621 An Arboricultural Survey Report and Impact Assessment was previously submitted in support of the original applications. This report has subsequently been amended in order to account for changes resulting from the July 2020 application amendments. The current report, dated July 2020, remains unaffected by the minor amendments incorporated in the September 2020 scheme amendments.

622 The baseline study identifies a total of 178 existing Trees or Tree Groupings within the area affected by the development in Applications A and B. Of these, 13 are classified as Grade A (of high quality and value), 86 are Class B (moderate quality and value, 69 are class C (low quality or value), and 10 are Class U (unsuitable for retention in current condition).

623 In regards to the Application A site, there presently are no trees within the detailed portion of the site east of Ship Lane with the exception of trees located on the adjacent towpath site, all of which are proposed to be retained as part of the proposed development. Remaining trees within the Application A site area are situated in the outline portions of the development site, where they are mostly subject either to

individual Tree Protection Orders (TPOs) or a wider TPO Area Designation which encompasses a broad area to the west of Ship Lane.

624 A total of 36 trees are proposed for removal on the Application A site, which comprise:

Category of Tree	Tree ID	Number of Trees
A	T29	1
B	T5, T6, T7, T8, T9, T10, T11, T14, T15, T25, T26, T27 and G151	13
C	T2, T16, T17, T22, T24, T31, T32, T34, T37, T40, T45, T46, G47 (partial), T59, T60, T62, G147	17
U	T12, T28, T30, T33, T35	5
<b>TOTAL</b>		<b>36</b>

Table 21.0 – Application A - Trees for removal

625 In regards to the Application B (school) site, existing trees are sited along the southern boundary of the site with Lower Richmond Road, with separate clusters of trees existing in the north-western corner and on the central eastern portion of the application site. The following trees are proposed for removal to facilitate the development on the Application B site:

Category of Tree	Tree ID	Number of Trees
A	-	0
B	T64, T88, T90, T93, T94, T95, T96, T97, T98, T99, T100	11
C	T89	1
U	-	0
<b>TOTAL</b>		<b>12</b>

Table 22.0 – Application B - Trees for removal

626 It is noted that the majority of trees proposed for removal are in instances where they are in direct conflict with proposed building form. In this respect, it is further noted that the significant scale of redevelopment sought for the site by both the Stag Brewery Planning Brief SPD and Site Allocation SA 24 of the Richmond Local Plan, are likely to result in a degree of tree clearance being required in any future redevelopment of the site.

627 Whilst the loss of existing Category A and B Trees on the site is regrettable, it is recognised that these are predominately internal trees which do not contribute widely to the existing external appreciation of the site. Where existing trees represent dominant

boundary features such as the series of Plane Trees situated along Ship Lane, the trees situated along Lower Richmond Road, and the off-site trees bordering the River Thames, these are all largely proposed to be retained and protected as part of the development proposals.

628 In addition to the retention of trees identified in the application areas, a total of 406 new trees are proposed to be provided as detailed on the Site Wide Landscape Masterplan. The significant scale of additional tree planting, integrated with the design of substantial new areas of public realm, is considered adequate compensation for the proposed removal of 48 existing trees to facilitate the redevelopment of the site in line with the broader site objectives. Conditions of approval detailing the protection of existing trees during the construction phase are recommended to be secured.

629 Richmond Council in its representation raise the likely removal of an additional single street tree (part of G151) to necessitate S278 Highway Works. The s106 agreement will secure appropriate compensation for the loss of this tree, along with G147, T59 and T60 that were shown for removal as part of the previous scheme, through a Capital Asset Value for Amenity Trees (CAVAT) valuation.

630 In this regard the proposals are acceptable in accordance with Policies G7 of the London Plan, and LP 16 of the Richmond Local Plan.

### Biodiversity

631 Paragraphs 170 and 175 of the NPPF state that planning decisions should contribute to enhancing the natural environment by minimising biodiversity impacts and avoiding or mitigating harm and providing net gains. Paragraph 177 states that the presumption in favour of sustainable development does not apply where the proposal is likely to have a significant effect on a habitats site (either alone or in combination with other proposals), unless an appropriate assessment has concluded that the proposal will not adversely affect the integrity of the habitats site.

632 London Plan Policy G6 states that Sites of Importance for Nature Conservation (SINCs) should be protected; however, where harm is unavoidable, the benefits of the development should clearly outweigh the impacts, with suitable mitigation applied. Policy G5 of the London Plan requires new development to provide urban greening in order to contribute to the adaptation and reduction of the effects of climate change. Policy G5 also requires boroughs to develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.

633 Policy LP 15 of Richmond's Local Plan seeks to preserve and enhance the Borough's biodiversity through requiring new development to incorporate a create new habitats or biodiversity features, deliver net gains for biodiversity through ecological enhancements, ensure connections to wider ecological infrastructure, enhance wildlife corridors for the movement of species, and maximise the provision of soft landscaping. Policy LP 17 aims to secure at least 70% of roof areas of new development for green / brown roofs.

634 A preliminary Ecological Appraisal was previously submitted with the original proposals, which found the ecological value of the existing site to be limited. Mitigation of the loss of habitat was proposed through a mixture of soft landscaping, a community park, habitat area (adjacent school site), green corridors, tree retention, bat and bird nesting boxes, green rooves, and lighting controls.

635 A revised Preliminary Ecological Appraisal and Environment Statement were subsequently submitted in support of the July 2020 amendments to the proposals, with no further changes proposed to landscaping or ecology measures as a result of the further September 2020 scheme amendments. The Council has raised concerns about the age of surveys undertaken, particularly bats, however, updated surveys were undertaken in 2019 and as such are considered to be robust. Furthermore, pre-commencement checks will be secured by condition. The absence of a Biodiversity Net Gain Assessment is considered acceptable on balance given the site circumstances.

636 The harm to biodiversity continues be limited and the benefits of the proposals, including mitigation measures, outweigh this harm. Subject to the recommended conditions to secure the agreed mitigation measures, the proposal accords with the NPPF, Policy G6 of the London Plan; and Policy LP 15 of Richmond's Local Plan.

### Urban Greening

637 The applicant has provided a calculation of the Urban Greening Factor, demonstrating a site wide UGF of 0.29 will be achieved across the combined proposals for the application site (Applications A and B), as demonstrated in the following table:

Surface Cover	UGF Factor	Area (sq.m)	Value
Semi-natural vegetation	1	417	417
Wetland or open water	1	0	0
Intensive green roof or vegetation over structure	0.8	5034	4027.2
Standard trees planted in natural soils, or in connected tree pits	0.8	15738	12590.4
Extensive green roof with substrate of minimum 80mm	0.7	838	586.6
Flower-rich perennial planting	0.7	0	0
Rain gardens and vegetated SUDS	0.7	229	160.3
Hedges	0.6	824	494.4
Standard trees planted in pits	0.6	1582	949.2
Green Wall	0.6	0	0
Groundcover planting	0.5	3322	1661
Amenity Grassland	0.4	12624	5049.6
Extensive green roof of sedum mat	0.3	0	0
Water features (chlorinated) or detention basins	0.2	58	11.6
Permeable paving	0.1	9072	907.2
Sealed surfaces	0	42851	0
Total Site Area	92589		
Urban Greening Factor	0.29		

Table 23.0: UGF calculation (Source: Gillespies Urban Greening Summary - P10736-00-003-GIL-190806)

638 Whilst the calculated UGF of 0.29 is below the UGF target of 0.4 set by the London Plan, it is considered acceptable given lower UGF values assigned to amenity plantings and artificial sports pitches, which are broader requirements integral to the redevelopment of the site as outlined in the Planning Brief.

639 The application incorporates 2,164 sq.m of green roof space and 360 sq.m of brown roof space, which collectively equate to 56% of all available available roof space. Although this is below the local target of 70% green/brown roof provision set by Policy

LP 17 of the Richmond Local Plan, it is accepted that additional provision may be achieved during future detailed design development in outline areas of the proposals. It is also noted that a number of constraints to further provision are caused by the demands of other mechanical plant and sustainability infrastructure requirements at roof level (such as PV Cells, mechanical plant and lift overrun structures) in addition to limitations provided design elements such as the inclusion of pitched roofs. GLA officers are satisfied that the current quantum of green and brown roof provision has been suitably maximised, with scope for further enhancement during future consideration of Reserved Matters in areas of outline consent.

640 As such the proposal accords with the NPPF, Policy 7.10 of the London Plan; Policy G5 of the Intend to Publish London Plan; and LP 17 of Richmond's Local Plan.

## **Waste Management**

641 London Plan Policy SI7 seeks to reduce waste and increase material reuse and recycling and promotes a circular economy. The Policy also sets several waste targets including a strategic target of zero biodegradable waste or recyclable waste to landfill by 2026. Policy LP 24 of the Richmond Local Plan requires developments to provide adequate refuse and recycling stores, ensure appropriate design and management of refuse and recycling facilities, utilise rail and waterways for transportation (particularly of construction materials and waste), produce site waste management plans, and comply with Refuse and Recycling Storage SPD requirements for refuse collection and recycling.

642 The original Environmental Statement (ES) contained a Waste Management Assessment, Operational Waste Management Strategy and Site Waste Management Plan covering detailed and outline phases. These have been updated in an ES Addendum as part of the July and September 2020 scheme amendments. Details of waste management for outline phases will be assessed through Reserved Matters applications. The Council's Waste Officer raised no objection to the proposals, subject to the following inclusions in planning conditions and s106 obligations:

- Details of commercial waste storage and collection for Development Area 1.
- Financial contribution of £775 per 1100 litre bin (refuse and recycling) per year, to cover the costs of a second collection for residential waste in Development Area 1 (with future charges being based on Council's agreed charges for future years), secured through the s106 agreement.
- Contingency plan for waste collections to buildings 2, 3, 7, 8, 11 and 12 in the event of a goods lift breakdown.
- Accessibility of bin stores in buildings 3, 8, 12, 4, 5, 6, 9, and 10.
- Swept path analysis for refuse collection vehicles in Development Area 2.

643 Other issues raised by the Council include; the separation of bulky waste within bin stores for ease of use/access; allowing adequate space for storage of food waste should a food collection be introduced; and minor configuration issues of bin stores in Building 4. GLA officers consider that these can all be addressed by conditions.

644 Conditions are also proposed requiring submission of a feasibility study prior to each phase to demonstrate that all reasonable endeavours have been made to

maximise the use of the Thames for the removal of construction waste and delivery of construction materials and that these will be implemented. This will however be dependent upon vessels being able to travel underneath Hammersmith Bridge. A construction management statement detailing waste management is also secured by condition for all phases.

645 The applicant has provided a Circular Economy Statement in line with Intend to Publish London Plan SI7, which demonstrates how all materials arising from demolition and remediation works will be re-used and/or recycled; how design and construction will reduce material demands, and allow re-use; how as much waste as possible will be managed on-site; outlines storage space and collection systems to support recycling and re-use; estimates of how much waste the proposal is expected to generate; and how and where it will be managed, monitored and reported.

646 As such, the development is acceptable in regard to waste management and accords with London Plan Policy SI7 and Policy LP 22 of the Council's Local Plan.

### **Contaminated Land**

647 Policy LP 10 of the Richmond Local Plan requires that development of brownfield sites appropriately deals with any risk of land contamination prior to development proceeding.

648 The previous Environmental Statement (ES) contained an assessment of ground contamination, which has subsequently been updated in the July and September 2020 ES Addendums. The assessment considers that there is a medium contamination risk, owing to the site's previous industrial use as a brewery.

649 Amended ground contamination analysis provided in the July and September ES Addendums outline that current proposals do not involve significant changes to the proposed end-use of buildings, foundation design or building footprint beyond that which was previously considered. Whilst the basement floorspace west of Ship Lane has been reduced from the previous proposal, the depth remains unchanged, and the basement east of Ship Lane has been expanded slightly.

650 It is not considered that the proposed basement changes would result in additional impact on ground conditions and or contamination risks previously identified. Similarly, changes to above-ground development would not result in impact on the previously assessed ground contamination risks.

651 Subject to conditions regarding the adoption of further site investigation and mitigation strategies, the development remains acceptable in regards to contaminated land management and accords with Policy LP 10 of the Richmond Local Plan.

## **Mitigating the impact of the development through planning obligations**

### **Health impacts**

652 It is noted that local residents have raised concerns about the health impacts of the development and the suitability of the applicant's Health Impact Assessment (HIA), which notably does not take into account impacts of the Covid-19 pandemic. The

health-related issues raised have been addressed through various sections of this report, notably open space, housing standards, transport and air quality. Whilst the concerns of local residents with regard to the impact of possible post-pandemic lifestyle changes are acknowledged, GLA officers consider that there is insufficient robust evidence available at this time (to inform, for example, changes to standards for residential development or public open space provision) to indicate that a decision should be taken other than in accordance with the development plan.

## **Planning obligations**

653 Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are statutory tests.

654 The NPPF states that “local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”

655 At the regional level, London Plan Policy DF1 identifies that priority should firstly be given to affordable housing and necessary public transport improvements; and following this recognise the role large sites can play in delivering necessary health and education infrastructure; and the importance of affordable workspace, and culture and leisure facilities in delivering good growth.

656 Pursuant to the considerations within the previous sections of this report, and in line with the policy context set out above, GLA officers propose to secure planning obligations to appropriately mitigate the impact of this development. GLA officers consider that the obligations in the Section 106 agreement meet the tests in Regulation 122 of the CIL Regulations 2010, as amended in 2019. A full list of the obligations is provided under the ‘Section 106 legal agreement’ section above, and where appropriate there is detailed consideration given in the relevant topic section of the report. Where appropriate, GLA officers have provided an additional commentary below to support the consideration within this report and to inform the detailed drafting of a section 106 agreement.

657 It should be noted that a number of obligations remain under discussion with the applicant and the Council. As such whilst GLA officers consider that a sufficient level of agreement has been reached to ensure that the impacts of the development can be mitigated, discussions remain ongoing in relation to the detailed drafting of S106 clauses and the amounts of some financial contributions.

## **Affordable housing**

658 As discussed in the housing section of this report, the section 106 agreement would secure 30% affordable housing by habitable room, in accordance with the proposed tenure mix, with appropriate obligations in relation to the definition, eligibility, affordability and perpetuity of affordable housing units across the various tenures. Through the viability assessment, the affordable housing has been confirmed as the



maximum that can be supported by the scheme at this stage, based on present day assumptions. Early, mid and late review mechanisms would be set out in the section 106 agreement to incentivise the delivery of the development and secure the potential for an enhanced affordable housing provision, should it become viable. Appropriate phasing triggers securing delivery of the affordable housing will also be secured, although it is noted that these still require further discussion. Further details regarding the affordable housing obligations are set out in the 'Section 106 legal agreement' section above.

## Transport

659 The following transport obligations would be secured, and further details are set out in the 'Transport' section:

- Chalkers Corner junction works: Option 2 as discussed in the 'Transport' section;
- A Sustainable Transport Fund of £350,000 as part of a manage and monitor approach to mode share targets in the Travel Plans and potentially implement further sustainable travel measures, including pedestrian/cycle infrastructure or a bus lane on Lower Richmond Road (noting that this would require the agreement of the Council);
- Travel Plans for both applications, along with a monitoring contribution of £30,000, to promote and monitor sustainable travel;
- Travel Plan bond for the secondary school, to incentivise sustainable travel and fund sustainable travel initiatives in the event of non-compliance with Travel Plan targets (amount to be agreed);
- Bus contribution of £3,675,000 towards enhanced capacity to mitigate bus trips from the development;
- Controlled Parking Zone (CPZ) consultation and implementation contribution of £130,000, to mitigate against potential parking overspill;
- Restriction on future residents applying for parking permits;
- Highways works;
- Bus infrastructure;
- Car club, 3 dedicated spaces on public highway and 2 years free membership for future residents;
- Safeguarding of land for potential future delivery of a cycle hire docking station;
- On street car parking: re-provision of spaces along Ship Lane and Williams Lane with electric charging infrastructure;
- Internal site roads, access and temporary access road;
- Contribution of £228,878 towards pedestrian improvement scheme on Lower Richmond Road, Mortlake High Street and Sheen Lane;
- Level crossing and overbridge works: additional bridge signage, general improvements to the pedestrian bridge, moving bollards back on both North and South Worple Way and setting back vehicle stop lines.

### Employment and commercial land use:

660 The following obligations would be secured:

- Provision of 10% affordable office space at 80% of market rent in perpetuity, including Workspace Management Plan / Strategy, in line with the requirements of the Site Allocation;
- Employment & Skills Plan / Local Employment Agreement (construction and operation), in line with the requirements of the Council's Planning Obligations SPD;
- Building Management Plan (B Use Class floorspace to be marketed to local firms and businesses in the first instance);

### Community uses:

661 The following obligations would be secured in respect of the community centre and boathouse:

- Delivery of the community centre on the ground floor of Building 4 at peppercorn rent for a minimum period of 10 years, with cascade arrangements;
- Delivery of the boathouse in Building 9 for 10 years with associated water sports centre specification.

### School:

662 Delivery of a cleared and serviced site to the Department for Education / LocatEd for the provision of a secondary school and sixth form. Detailed arrangements for this provision requires further discussion, including how any potential covenant on the use of the land and/or cascade arrangement would operate.

### Open space, sport and play space:

663 The following obligations would be secured:

- Contribution towards enhancements to public parks and open spaces to mitigate the impacts of additional use associated with future occupiers of the development. The amount of the financial contribution is still under discussion;
- Delivery of public realm and public access to all open spaces and public realm within the development;
- On site sports facilities:
  - Not to remove the pavilion and playing fields or implement Application B until a contract has been entered into with the ESFA / LocatEd / DfE for the school and sports facilities, and the Community Park;
  - To reinstate the playing fields if the Community Park and school and sports facilities have not been completed within 5 years of commencement of Application B;
  - Delivery of new indoor and outdoor sports facilities alongside the school.
- Playing pitch contribution of £18,000;
- Provision of Community Park and contribution (amount still under discussion);

- Barnes Eagles FC:
  - Termination of licence - not be terminated until the initial contribution has been paid - £90,750;
  - Contribution of £45,375 per annum from third anniversary of vacation date until the replacement facilities have been provided on site;
  - Agreement for priority use of the 3G pitch within the scheme at an agreed rate (1 weekend and 2 evening sessions);
  - A temporary licence allowing use of the grass pitches and the sports pavilion by Barnes Eagles FC until the school land is commenced.
- Noise: Covenant of use for new residents, which would build in lease restrictions to prospective tenants of the new neighbouring residential properties immediately fronting on to the sports pitches;
- Community Use Agreement;
- Towpath works and contribution - £44,265.

#### Energy:

664 The following obligations would be secured:

- Carbon offset payment to reflect zero-carbon requirement for all uses, with mechanism to allow a reduction if on-site carbon savings are increased on consideration of detailed energy strategies;
- 'Be seen' energy monitoring.

#### Trees:

665 CAVAT bonds / contributions to be secured to compensate for the loss of trees as part of the development. Amounts and detailed arrangements require discussion.

#### Health:

666 A contribution towards enhanced healthcare facilities off site, amount requires discussion.

#### Waste:

667 Contributions towards a secondary waste collection or a private collection. If a contribution is required, it would be £53,475 per annum for Development Area 1 with contribution for Development Area 2 to be determined at Reserved Matters stage.

#### Construction and phasing:

668 The following obligations would be secured:

- Construction management and monitoring fee (£30,000);
- A contribution towards assessing and processing applications under the Control of Pollution Act and carrying out noise monitoring – requires further discussion;
- Community liaison;

- Phasing / Programme Plan.

### Monitoring:

669 Financial contribution paid to the Council to facilitate the monitoring of obligations within the agreement.

## **Legal considerations**

670 Under the arrangements set out in Article 7 of the 2008 Order and the powers conferred by Section 2A of the Town and Country Planning Act 1990, the Mayor is the Local Planning Authority (LPA) for the purposes of determining these planning applications.

671 Section 35 of the Greater London Authority Act 2007 inserts section 2F into the Town and Country Planning Act 1990 a requirement that for applications the Mayor takes over, the Mayor must give the applicant and the LPA the opportunity to make oral representations at a hearing. He is also required to publish a document setting out:

- who else may make oral representations;
- the procedures to be followed at the hearing; and,
- arrangements for identifying information, which must be agreed by persons making representations.

672 The details of the above are set out in the GLA's 'Procedure for Representation Hearings' which reflects, as far as is practicable, current best practice for speaking at planning committee amongst borough councils.

673 In carrying out his duties in relation to the determination of these applications, the Mayor must have regard to a number of statutory provisions. Listed below are some of the most important provisions for these applications.

674 Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that the authority shall have regard to:

- a) The provisions of the development plan, so far as material to the Application;
- b) Any local finance considerations, so far as material to the Application; and
- c) Any other material consideration.

675 Section 70(4) defines "local finance consideration" as:

- a) A grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
- b) Sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.

676 In this context "grants" might include the Government's "New Homes Bonus" - a grant paid by Central Government to local councils for increasing the number of homes and their use.

677 These issues are material planning considerations when determining planning applications or planning appeals.

678 Furthermore, in determining any planning application and connected application, the Mayor is required by section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine the application in accordance with the development plan (i.e. the London Plan and the adopted Local Plan) unless material considerations indicate otherwise.

679 Other guidance, which has been formally adopted by Richmond Council and the GLA (e.g. Supplementary Planning Documents and Supplementary Planning Guidance), will also be material considerations of some weight (where relevant). Those that are relevant to this application are detailed in this Representation Hearing report.

680 Officers are satisfied that the current report to the Mayor has had regard to the relevant provisions of the development plan. The proposed section 106 package has been set out and complies with the relevant statutory tests; and together with the proposed conditions adequately mitigates the impact of the development and provides necessary infrastructure improvements.

681 As regards Community Infrastructure Levy (CIL) considerations, the total CIL liability associated with this development is estimated to be in the region of £36 million.

682 In accordance with his statutory duty in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Mayor shall have special regard to the desirability of preserving listed buildings, their settings and any features of special architectural or historic interest which they possess. Pursuant to section 72 of the Planning (Listed Buildings and Conservation Areas) Act, he must also pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. These matters have been addressed within earlier sections of the report.

683 Where the Mayor takes over an application, he becomes responsible for the completion of the section 106 legal agreement, although he is required to consult the relevant borough(s). In this instance, there have been a series of lawyer led meetings to discuss the section 106 content, and it has progressed on the key issues. The Council has also been consulted.

684 When determining these planning applications, the Mayor is under a duty to take account of the provisions of the Human Rights Act 1998 as they relate to the development proposal and the conflicting interests of the applicant and any third party affected by, or opposing, the application, in reaching his decision. Planning decisions on the use of land can only be taken in line with the Town and Country Planning Acts and decided in accordance with the development plan unless material considerations indicate otherwise.

685 The key Articles to be aware of include the following:

- (a) Article 6 - Right to a fair trial: In the determination of his civil rights and obligations... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.
- (b) Article 8 - Right to respect for private and family life: Everyone has the right to respect for his private and family life, his home and his correspondence.
- (c) Article 1 of the First Protocol - Protection of property: Every person is entitled to the peaceful enjoyment of his possessions.

686 It should be noted, however, that most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted i.e. necessary to do so to give effect to the Town and Country Planning Acts and in the interests of such matters as public safety, national economic well-being and protection of health, amenity of the community, etc. This report sets out why the application is considered acceptable overall.

687 Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are now statutory tests.

688 The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

689 The protected characteristics set out in the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.

690 Officers are satisfied that the application material and officers' assessment has taken into account the equality and human rights issues referred to above. Particular matters of consideration have included provision of accessible housing and disabled persons parking bays, the provision of affordable and family housing and the protection of neighbouring residential amenity.

## **Conclusion and planning balance**

691 As detailed above, Section 38(6) of the Planning and Compensation Act 2004 requires matters to be determined in accordance with the development plan unless material considerations indicate otherwise.

692 When assessing the planning applications, the Mayor is required to give consideration to the provisions of the development plan and all other material considerations. He is also required to consider the likely significant environmental effects of the development and be satisfied that the importance of the predicted effects and the scope for reducing them, are perfectly understood.

693 In preparing this report, GLA officers have taken into account the likely environmental impacts and effects of the development and identified appropriate mitigation actions to be taken to reduce any adverse effects. In particular, careful consideration has been given to the proposed conditions and planning obligations, which would have the effect of mitigating the impact of the development.

### The 'tilted balance'

694 Paragraph 11c of the NPPF sets out a presumption in favour of sustainable development in circumstances where the proposed development is considered to accord with an up-to-date development plan. As noted above in the 'Housing Delivery' section, GLA officers recognise that the Council have a deliverable 5-year housing land supply. The Council also has a very recently adopted Local Plan and has passed the Housing Delivery Test in 2020. Overall, based on this information, the tilted balance is not engaged in respect of this application.

### The heritage balance

695 As described in the 'Historic Environment' section above, the proposal would cause less than substantial harm in the following instances:

- Loss of some historic fabric in the Maltings Building (BTM within a Conservation Area) resulting from works necessary for its adaptation from industrial to community and residential use;
- Loss of some historic building fabric (excluding retained portions of building facade) in the Former Hotel and Former Bottling Plant (BTMs within a Conservation Area);
- Demolition of the majority of former brick boundary walls (BTMs within Conservation Areas);
- Harm to the significance of the Mortlake Conservation Area owing to impact on setting from height and massing and to the setting of the Maltings Building (BTM) when viewed from Chiswick Bridge and Chiswick Bank;
- Harm to the significance of the Grade II listed residential properties situated on Thames Bank between Ship Lane and Chiswick Bridge, including Thames Cottage, Tudor Lodge, Thames Bank House, Leydon House and Riverside House owing to impact on setting from height and massing;
- Harm the significance of the Mortlake Conservation Area and Mortlake Green Conservation Area and the Former Bottling Building and Former Hotel Building (BTMs) owing to setting impact from the south.

696 Such impact would cause a degree of harm to the understanding and appreciation of the heritage significance of these assets, which would fall at the lower end of the scale of the 'less than substantial' harm, as defined by the NPPF. It is however noted that there are multiple instances of harm and these must be considered individually and cumulatively in the balance and any harm to designated heritage assets must be accorded great weight.

697 The scheme would also deliver the following heritage benefits:

- The adaptation and re-use of the Maltings Building with ongoing viable uses (including community facilities);
- The restoration of the most significant facades of the Former Hotel and Former Bottling Plant buildings, and their incorporation within the new development;
- Use of the retained portions of the Former Hotel Building in a newly proposed hotel, returning the historic use to the site.

698 As the significance of a number of heritage assets would not be 'conserved', the application would be contrary to Policies D9 and HC1 of the London Plan and Local Plan Policies LP 3 and LP 4. There is no balancing act built into any of these policies.

699 Paragraph 193 of the NPPF says: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

700 However, paragraph 196 of the NPPF also states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

701 The proposals would provide the following public benefits, which would weigh in favour of the scheme:

- The heritage benefits set out above;
- Creation of substantial amounts of high quality new and improved public realm and open space across the site, including a new 'Green Link' connecting Mortlake Green and the Thames Riverfront, a Community Park and improvements to the Thames towpath;
- A new 6-form-entry secondary school and sixth form;
- Upgrade of existing sports pitches and facilities, with improved levels of community access;
- Provision for a 'rowing club' or similar water-sports based leisure facility;
- Provision of a community space;
- Substantial provision of additional housing and affordable housing across the site, contributing to Richmond Council's housing and affordable housing targets and London's needs, including 30% affordable housing that has been verified as the maximum;
- An appropriate mix of policy-compliant land uses that will collectively form a new 'Village Heart' for Mortlake in line with the Planning Brief and Site Allocation;
- Affordable workspace for local SMEs;
- A series of well-designed buildings that achieve high standards of sustainable design;
- Transport improvements including enhanced bus services, junction works and pedestrian environment improvements within the vicinity of the site; and Other financial contributions, including those towards sport and local open space enhancements.

702 Considerable weight and importance must be attached to the harm caused by the proposals to surrounding heritage assets in any balancing exercise. However, considering the extent of the harm that would be caused, which would be 'less than substantial' at the lower end of the scale, and the public benefits outlined above, it is concluded that the public benefits delivered by the scheme would clearly and convincingly outweigh the harm. The balancing exercise under paragraph 196 of the Framework therefore supports the grant of planning permission and, despite the policy conflicts outlined above, the proposals would be acceptable in terms of impact on heritage assets.



## Overall planning balance

703 As noted above, the proposals do not fully comply with development plan policies concerning heritage, although the NPPF paragraph 196 balancing act is favourable to the scheme.

704 The proposal would also fail to comply with some other policies of the development plan, namely London Plan Policies S6 (absence of public toilets within the scheme), D4 (absence of design scrutiny through a DRP) and D9 (height of tall buildings). It is also noted that there would be some adverse daylight and sunlight impacts to neighbouring properties. However, it is not unusual for applications of this scale and nature to result in conflicts with some policies. Development plan policies can, and in this case do, pull in different directions. Overall, notwithstanding the conflict with some development plan policies, the proposed development is considered to comply with all other policies and is considered to accord with the development plan overall. Even were that not the case, having regard to the material considerations set out within this report, GLA officers consider that the planning balance weighs in favour of the grant of permission.

## Conclusion

705 This report has considered the material planning issues associated with the proposed development in conjunction with all relevant national, regional and local planning policy, and has found that the proposed development is acceptable.

706 Accordingly, it is officers' recommendation that planning permission should be granted to Applications A (Ref: 18/0547/FUL) and B (18/0548/FUL), subject to the obligations set out under 'Section 106 legal agreement' and 'Conditions' at the start of this report.

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