



GERALDEVE



# **Stag Brewery, Mortlake**

## **Town Planning Statement**

For Reselton Properties

February 2018



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The Former Stag Brewery, Mortlake

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On behalf of: Reselton Properties Limited

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# 1 Executive Summary

- 1.1 This Town Planning Statement has been prepared in support of three linked planning applications ('the Applications') for the comprehensive redevelopment of the Former Stag Brewery Site in Mortlake, along with associated highways works. This Town Planning Statement provides a comprehensive review of all relevant national, regional and local planning policy and guidance, and sets out the planning justification for the proposed development. It should be read in conjunction with the other supporting documents submitted in support of the Applications.
- 1.2 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act (2004) comprises: the London Plan (2016); and the London Borough of Richmond upon Thames ('LBRuT') Core Strategy (2009) and Development Management Plan ('DMP') (2011). Consideration has also been given (and weight attached) to LBRuT's emerging draft Local Plan (2017) which is expected to be adopted in the near future. In developing the masterplan, consideration has been given to all relevant national, regional and local planning policy and guidance and relevant statutory tests.
- 1.3 The redevelopment would provide homes, potential accommodation for an older population, complementary commercial uses, community facilities, a new secondary school alongside new public open and green spaces throughout. Associated highway improvements are also proposed, which include works at Chalkers Corner junction.
- 1.4 The masterplan proposals have evolved during an extensive period of pre-application discussions with LBRuT, the GLA, TfL, local community groups and other relevant stakeholders, dating back to spring 2016. Throughout the development of the masterplan proposals, the Applicant has sought to achieve the aims and aspirations of the Council's adopted Stag Brewery Planning Brief (2011) and the emerging Site Allocation (draft Policy SA 24, as contained within the emerging Local Plan).
- 1.5 In line with the Brief and the Site Allocation, the final proposed masterplan looks to deliver a new 'village heart for Mortlake' which delivers new uses and social infrastructure within a development which respects and relates to its local

surroundings.

- 1.6 The proposed development would deliver a substantial quantity of high quality new homes and the scheme would provide affordable housing on Site. The delivery of new homes would not only assist in helping to meet identified critical need for housing in London, it would also result in a new population which would help to generate a new village heart for Mortlake. The scale and amount of residential development on Site is appropriate and has had due regard to all relevant design, transport and amenity considerations and other planning objectives.
- 1.7 The Applicant's vision for the Site is to deliver a truly mixed use development, in line with LBRuT's aspirations. Therefore, an appropriate amount of non-residential floorspace would be brought forward. Town centre uses, including retail, restaurants/bars, offices, hotel/pub with rooms and leisure uses would help to deliver local jobs and a new village heart, alongside new community spaces. A care home would be provided and some assisted living accommodation may also come forward and is applied for flexibly.
- 1.8 The scheme would also provide a new six form entry secondary school plus sixth form, which has been identified as a local need by LBRuT. A range of indoor and outdoor associated sports facilities would be provided and measures would be put in place to enable extended community use out of school hours.
- 1.9 The existing Site is not publicly accessible and currently provides a physical barrier between Mortlake, Mortlake Green and the riverside. A key aspiration of the Planning Brief and the emerging Site Allocation is to open the Site up, and foster meaningful and attractive links from Mortlake to the riverside. The masterplan fully achieves this aim, and provides a significant amount of new, publicly accessible space, a large proportion of which is green. This would deliver substantial benefit to the existing and the proposed new local community.
- 1.10 The design of the scheme has been developed in close conjunction with LBRuT, the GLA and the local community. In particular, proposed building heights have been designed and refined to reflect local context. The design of the buildings and spaces themselves has sought to reflect the surrounding environment and local design cues, including picking up on the Site's location by the riverside and its industrial

heritage.

- 1.11 Significant consideration has been given to the impacts of the proposed development on the local highway network. A range of highways works and sustainable measures are proposed to minimise this impact, including a package of works to increase traffic capacity at the Chalkers Corner junction. In bringing forward these works, the development is acceptable in highways traffic terms.
  
- 1.12 The masterplan has given careful consideration to a range of other relevant planning considerations including, but not limited to, design and townscape, landscaping, public realm and open space, heritage, views, other transport impacts including on rail, buses and local pedestrian and cycle walkways, energy and sustainability, ground contamination, services and utilities, flooding, noise and vibration, air quality, biodiversity and ecology, daylight/sunlight, lighting and wind microclimate. An Environmental Statement ('ES'), prepared by Waterman Infrastructure & Environment Limited ('Waterman IE') has been submitted with the Applications, along with a suite of other documents which assess the acceptability of the proposed development.
  
- 1.13 This Town Planning Statement concludes that the proposed development is in accordance with relevant strategic and local policy objectives, and specific policy criteria. These include strategic policy objectives around housing delivery, mixed use sustainable development and place-making.

## 2 Introduction

- 2.1 This Town Planning Statement has been prepared by Gerald Eve LLP on behalf of Reselton Properties Limited ('the Applicant') in support of three linked planning applications ('the Applications') for the comprehensive redevelopment of the former Stag Brewery Site in Mortlake ('the Site') within the London Borough of Richmond Upon Thames ('LBRuT').
- 2.2 The former Stag Brewery Site is bounded by Lower Richmond Road to the south, the river Thames and the Thames Bank to the north, Williams Lane to the east and Bulls Alley (off Mortlake High Street) to the west. The Site is bisected by Ship Lane. The Site currently comprises a mixture of large scale industrial brewing structures, large areas of hardstanding and playing fields.
- 2.3 The redevelopment would provide homes (including affordable homes), potential accommodation for an older population, complementary commercial uses, community facilities, a new secondary school alongside new public open and green spaces throughout. Associated highway improvements are also proposed, which include works at Chalkers Corner junction.
- 2.4 The three planning applications are as follows:
- Application A – hybrid planning application for comprehensive mixed use redevelopment of the former Stag Brewery site consisting of:
    - i. Land to the east Ship Lane applied for in detail (referred to as 'Development Area 1' throughout); and
    - ii. Land to the west of Ship Lane applied for in outline (referred to as 'Development Area 2' throughout).
  - Application B – detailed planning application for the school (on land to the west of Ship Lane).
  - Application C – detailed planning application for highways and landscape works at Chalkers Corner.
- 2.5 Full details and scope of all three planning applications are described in section 4 of this Town Planning Statement.



2.6 This Town Planning Statement provides a comprehensive review of relevant national, regional and local planning policy and guidance. It sets out the planning case for the proposed development, taking on board development plan policies and other material considerations.

**Planning Brief, Site Allocation and Masterplan Approach**

2.7 **Adopted and emerging planning policy and guidance promotes the redevelopment of the Stag Brewery Site for a ‘new village heart’ for Mortlake which should provide a mix of uses to provide a new recreational and living quarter. Policies and guidance promote residential, commercial, community uses as well as a new school alongside the provision of new public open and green spaces and improved access routes to the river. The application proposals are to be considered against the policy and guidance framework.**

2.8 The Stag Brewery Site was sold by AB InBev in December 2015 as it had become surplus to the company’s requirements and brewing operations were winding down. The Site was purchased by Reselton Properties Limited. In 2017, a major programme of decommissioning works was undertaken on Site, and this was carried out until October 2017.

2.9 The Applicant’s vision for the Site is to develop a truly mixed use scheme which integrates with the local community, maximises the Site’s prime position on the banks of the River Thames and delivers the aims and objectives of the LBRuT adopted planning brief for the site (July 2011) and the emerging Site Allocation Policy (January 2017).

2.10 LBRuT’s adopted Stag Brewery Planning Brief (‘SBPB’) and the emerging Site Allocation (Policy SA 24, as contained within the emerging Local Plan (January 2017)) set the framework for the masterplan development proposals. Both the SBPB and the emerging Site Allocation explain that redevelopment should comprise a mix of uses, including housing, education and community uses and other commercial and employment generating uses.

2.11 The July 2011 SBPB stated that the Site’s development would need to include a two-form entry primary school. However, in October 2015, LBRuT’s Cabinet

Committee approved a report to change the education requirement from a primary school to a six-form entry secondary school plus sixth form. Whilst the SBPB was not amended to reflect this change in requirement, the emerging Local Plan Site Allocation confirms this updated requirement.

2.12 In light of the provisions of the adopted SBPB, emerging Site Allocation policy and the amended education requirement, the scheme masterplan has incorporated the LBRuT education requirement for a new six form entry secondary school, plus higher education sixth form. The land for the school and associated play facilities would be handed over to LBRuT. The Education & Skills Funding Agency (the 'ESFA'), an executive agency who supports the Department of Education, are likely to be responsible for the construction and delivery of the school.

2.13 The scheme seeks to deliver a mixed use development which creates a new village heart for Mortlake by providing a range of uses and creating permeability through the site, linking Mortlake to the riverside. World-renowned architects, Squire & Partners, have worked alongside a range of technical specialists to develop a masterplan which takes a comprehensive design approach across the whole Site. The masterplan respects and responds to the surrounding local context, the riverside location and the Site's unique history. A key component of the masterplan is also to open the previously closed site to the public, and provide new, attractive and open public spaces throughout. Award winning landscape architects Gillespies have worked closely with the project team and relevant stakeholders throughout the design process in order to achieve this aim.

### **Application Structure**

2.14 Section 3 of this Town Planning Statement sets out the structure of the applications in full. In summary, the masterplan proposals comprise three planning applications, to be linked together through a Section 106 legal agreement:

- Application A – hybrid planning application for the main masterplan to be carried out across Development Area 1 and Development Area 2;
- Application B – detailed planning application for the school; and
- Application C – detailed planning application for highways and landscape

works at Chalkers Corner.

- 2.15 Appendix A of this Town Planning Statement includes two plans which illustrate the Site boundaries – plan ref. C645\_Z0\_P\_00\_001 shows the red line boundaries for Applications A, B and C and plan ref. JA12\_Z0\_P\_00\_008 shows the distinction between Development Areas 1 and 2 within Application A.
- 2.16 Necessary highways works outside the red line boundary would be carried out via a Section 278 agreement, to be secured by a Section 106 legal agreement. Further details on all aspects of the application structure are set out within section 3 of this Town Planning Statement.
- 2.17 The description of development for Application A is as follows:

**Hybrid application to include the demolition of existing buildings to allow for the comprehensive phased redevelopment of the site:**

**Planning permission is sought in detail for works to the east side of Ship Lane which comprise:**

- a) **Demolition of existing buildings (except The Maltings and the façade 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 8 storeys plus a single storey basement**
- c) **443 residential apartments**
- d) **Flexible use floorspace for:**
  - i. **Retail, financial and professional services, café/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) **Gym**
- h) **Offices**

- i) New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works**
- j) Provision of on-site cycle, vehicle and service parking at surface and basement level**
- k) Provision of public open space, amenity and play space and landscaping**
- l) Flood defence and towpath works**
- m) Installation of plant and energy centres**

**Planning permission is sought in outline 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 7 storeys**
- b) Residential development of up to 224 units**
- c) Nursing and care home (up to 80 en-suite rooms) with associated communal and staff facilities**
- d) Up to 150 units of flexible use living accommodation for either assisted living or residential use**
- e) Provision of on-site cycle, vehicle and service parking**
- f) Provision of public open space, amenity and play space and landscaping**
- g) New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works.**

2.18 The description of development for Application B is as follows:

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

2.19 The description of development for Application C is as follows:

**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.**

- 2.20 The final development proposals are the result of an extensive pre-application consultation process where the Applicant and the design team have worked closely with the local authority, the GLA, the local community and various other relevant stakeholders and bodies. The planning Applications are accompanied by a comprehensive Statement of Community Involvement, prepared by Soundings, which details the extent of the consultation process since early 2016.

### 3 Masterplan Application Components and Structure

- 3.1 In order to deliver a unified masterplan that creates a new village heart for Mortlake, a comprehensive site-wide approach has been taken to the masterplanning and design of the development. Alongside the overall masterplan, careful consideration has been given to the phasing and delivery of the key components of the scheme and the practicalities of how these can be brought forward without delay. Specifically, although the land for the new secondary school would be transferred to LBRuT, the applicant would not be responsible for its construction.
- 3.2 Highway improvement works at Chalkers Corner are required to facilitate the development of the school and/or the wider masterplan development i.e. they are necessary for any development of the Site. The required highway works involve development on the local highway, strategic highway network and third party land and cannot be secured and delivered under a Section 278 agreement. Therefore, planning permission is required, and this is applied for under Application C.
- 3.3 As a consequence of the above, to ensure that the school can be independently delivered by the relevant authorities without unnecessary constraints, and the Chalkers Corner highways works are delivered as part of any development, three linked planning applications are proposed, as set out in Table 1.

Application	Type of Application	Summary of Works
A (Main masterplan)	Hybrid – some elements in full detail and some in outline	Demolition of all buildings and structures (excluding the Maltings Building and the façades of the Former Hotel Building and the Former Bottling Plant) and comprehensive redevelopment of the former Stag Brewery site to provide a mix of uses.

B (School)	Full planning application	Erection of a six form entry secondary school plus higher education sixth form and associated access and play facilities. Application to include provision for temporary works to allow access to school.
C (Highway works)	Full planning application	Highways and landscaping works to Chalkers Corner.

**Table 1: Masterplan Applications**

- 3.4 Separate red line boundaries for each application have been submitted. A plan showing all three boundaries has also been submitted and included within this Town Planning Statement at Appendix A for illustration (ref. C645\_Z0\_P\_00\_001). A series of supporting plans showing ownership and Development Area 1 and 2 boundaries are also enclosed within Appendix A, and further red line plans have been enclosed within the submissions.
- 3.5 These Applications allow the scheme or the main masterplan scheme to be delivered independently of each other. However, importantly, these three planning Applications would be linked through a Section 106 legal agreement to ensure that Application B (School) land is handed over at an appropriate time and that Application C (Chalkers Corner Highway Works) is completed at an appropriate stage in conjunction with the build-out of Application A or Application B.
- 3.6 Given the scale of the development, construction would be carried out in phases on a plot by plot basis. As set out above, some elements of the scheme would be coming forward in outline and therefore it is envisaged that these would be delivered later in the construction phase.
- 3.7 Development Area 1 (part of Application A) and the School (Application B) would be applied for in detail, and Development Area 2 (part of Application A) would be applied for in outline. The Chalkers Corner works (the subject of Application C) would be completed prior to the occupation of either any phase of Application A or the school.

3.8 Table 2 demonstrates which elements of the scheme are applied for in full detail, and which are applied for in outline. The table should be read alongside the plans included at Appendix A (refs. C645\_Z0\_P\_00\_001 and JA12\_Z0\_P\_00\_008).

<b>Scheme Component</b>	<b>Access</b>	<b>Appearance</b>	<b>Landscaping</b>	<b>Layout</b>	<b>Scale</b>
<i>Application A – Mixed Use Scheme – Detailed Elements (Development Area 1)</i>					
Plot 1A	✓	✓	✓	✓	✓
Plot 1B	✓	✓	✓	✓	✓
Plot 1C	✓	✓	✓	✓	✓
<i>Application A – Mixed Use Scheme – Outline Elements (Development Area 2)</i>					
Plot 2A	x	x	x	x	x
Plot 2B	x	x	x	x	x
Plot 2C	x	x	x	x	x
<i>Application B – School – Detailed</i>					
School	✓	✓	✓	✓	✓
<i>Application C – Chalkers Corner – Detailed</i>					
Chalkers Corner	✓	✓	✓	✓	✓

**Table 2: Application Structure - Detailed Elements Applied For**

✓ Matter not reserved for subsequent approval, detailed design provided within the planning application.

X Reserved Matter. Details of the design to be subsequently agreed with LBRuT through the submission of Reserved Matters applications pursuant to planning conditions on the outline permission.



### **Application A – Hybrid Application – Main Masterplan scheme**

- 3.9 The main masterplan development comprises detailed and outline elements. Development Area 1 is applied for in detail and the Development Area 2 is to be applied for in outline.
- 3.10 Demolition of all buildings on the site (except the Maltings Building and the façades of the Former Hotel Building and the Former Bottling Plant) would be carried out under Application A, including the clearance of structures on the land associated with the proposed new school. Consequently, the Application A red line boundary covers all areas within the Stag Brewery Site. The Application B red line for the school is wholly within the red line boundary of Application A.
- 3.11 In respect of Development Area 2, the application seeks to agree the parameters for the land uses, siting, bulk and massing of these buildings along with the location of open spaces and necessary infrastructure, as demonstrated on the submitted parameter plans, prepared by Squire & Partners and Gillespies and included within this submission. The detailed design of these buildings will be the subject of subsequent formal Reserved Matters applications. A Design Code has been submitted as part of Application A to ensure that future Reserved Matters applications follow a clear design and landscape rationale for those individual buildings and spaces and comply with the identified parameters.

### **Application B – Detailed Application – School**

- 3.12 The proposed school has been designed in conjunction with LBRuT, the ESFA and other relevant stakeholders. The Applicant will provide the land for the new school and play/sports facilities and LBRuT/ESFA would be responsible for the delivery of the school. Any grant of planning permission for Application A would be subject to a legal agreement which would contain provisions to ensure that the school land would be transferred to LBRuT at an agreed and appropriate time.
- 3.13 It is currently anticipated that the first phase of the development would be the demolition of all structures on the former Stag Brewery Site (with the exception of the buildings to be retained), and this first phase of works would be carried out pursuant to the Application A planning permission. Thereafter, the next phase of the

main mixed use scheme (Application A, Development Area 1, Plot 1A) would come forward at the same time as construction of the school (Application B). The outline phases of Application A (Development Area 2 – Plots 2A, 2B and 2C) are likely to come forward at a later stage, potentially whilst development continues on the school and the detailed plots for Application A. A plan showing the plots referred to above is included at Appendix A.

- 3.14 Application B includes provision for interim works which would enable either the school or the masterplan to function independently in circumstances where either the school or the masterplan build programmes do not fully align. Importantly, as both proposals reach the point of completion, it is intended that there would be provisions to ensure that any interim works are upgraded to the proposed permanent works which would ensure full integration of both sites.

### **Application C – Detailed Application – Chalkers Corner**

- 3.15 The proposed works to Chalkers Corner includes works to land in private ownership as well as highway land and therefore it is necessary that a detailed planning permission is sought for this package of works.
- 3.16 Although the works proposed at Chalkers Corner have been designed to mitigate the effect of the masterplan as a whole (Applications A and B), given that the construction of either the school or the first phase of the wider masterplan independently would necessitate the need for the proposed junction improvements, it will be necessary to ensure these works are delivered prior to the occupation of either the school or specific phases of the wider masterplan. As a result, the delivery of the proposed works forming part of Application C would be linked to the construction and occupation of either Application A or B, whichever comes first.

### **Highways Works – Section 278 Agreement**

- 3.17 In addition to the proposed works to Chalkers Corner, a range of other highways works are required in connection with the masterplan. These would require works to adopted highway land and are therefore more appropriately secured through a S278 Agreement.

### **Illustrative Works**

- 3.18 There are also potential future opportunities for further landscape improvement works to Mortlake Green which are shown, indicatively, in some of the planning application documents, including the Landscape Design and Access Statement, prepared by Gillespies. These works would have benefits in terms of improving pedestrian access and connection routes from Mortlake rail station to the Site.

### **Application Documents – Submission Structure**

- 3.19 An Environmental Statement ('ES') has been prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended). In addition, a number of stand-alone reports have been prepared in accordance with LBRuT's validation requirements and as agreed with officers during pre-application discussions.
- 3.20 Although the redevelopment proposals are the subject of three separate planning applications, the majority of the submitted application documents, reports and assessments consider the development proposals as a collective whole (i.e. the scope of development proposed under all three planning applications). Such documents are submitted under Applications A, B and C. In addition, Applications B and C are accompanied by additional documents, drawings and reports relating specifically and solely to the works proposed under those applications.
- 3.21 Throughout this Town Planning Statement reference is made to the proposed building numbers, as shown on plan ref. C645\_MP\_P\_00\_001 (included at Application A and submitted separately as part of these Applications).

## 4 The Development Proposals

- 4.1 The proposed development seeks to create a new village heart for Mortlake through the provision of a mix of uses, high quality architecture, public realm and landscaping which encourages activity and permeability throughout the Site, helping to link Mortlake Green through to the riverside.
- 4.2 The masterplan would provide homes (including affordable homes) as well as potential accommodation and services for an older population, alongside a range of complementary commercial uses and community facilities for use by the new and existing local population. The masterplan would also deliver a new six form entry secondary school, plus higher education sixth form, in line with identified needs for the Borough.
- 4.3 The design of the development has evolved with consideration of key design principles which reflect the objectives as set out within the SBPB, as follows:
- a) **To ‘open up’ the site through the delivery of a comprehensive scheme which would deliver a variety of open spaces and enable public pedestrian and cycling permeability throughout;**
  - b) **To create a new green link from Mortlake Green to the riverside and encourage activity along the riverside through the provision of a range of uses and an attractive public realm;**
  - c) **To deliver a truly mixed use development through the provision of housing, employment opportunities, community (including a school), leisure and retail uses, all of which would help to enhance and expand the existing Mortlake community;**
  - d) **To recognise the historic importance of the site and celebrate the historic buildings and features;**
  - e) **To deliver buildings and spaces of architectural excellence, which take design cues from the surrounding area and which seek to deliver design diversity and interest and which are sustainable;**
  - f) **To deliver the necessary transport and highways works to mitigate any adverse transport and parking impacts on the transport network; and**
  - g) **To be financially viable and commercially deliverable, and to deliver the maximum reasonable amount of affordable housing.**

4.4 This section describes the development proposals in greater detail, in line with the masterplan application structure as outlined in section 3 of this Town Planning Statement.

### **Application A – Hybrid Application – Mixed Use Scheme**

4.5 Whilst a comprehensive development is proposed across the whole of the Application A site, the proposed development can be split into two distinctive land use zones:

- a) Land to the east of Ship Lane (submitted in detail) – Development Area 1;  
and
- b) Land to the west of Ship Lane (submitted in outline) – Development Area 2.

4.6 The boundaries of Development Areas 1 and 2 are shown on submitted plan ref. JA12\_Z0\_P\_00\_008, included at Appendix A of this Town Planning Statement for ease.

#### *Development Area 1*

4.7 Within Development Area 1, the character is proposed to be more commercial in nature and this is where the bulk of the non-residential uses are proposed. In line with the aspirations of the SBPB, a new ‘green link’ will bisect the eastern side of the site and provide a large open space which would link Mortlake Green to the riverside.

4.8 The green link will terminate at the Maltings Plaza, a new large public square which has been designed to connect to the surrounding buildings, the green link and the riverside. The existing Maltings building would be retained and refurbished to provide a new commercial or community use at ground floor. It is proposed to introduce new large windows at ground floor level of the Maltings Building to remove the current blank frontage and help link the building to Maltings Plaza. The new buildings along the riverside would incorporate ground floor flexible uses of a range of different types (see section 11 of this Town Planning Statement). It is also proposed to provide a new riverside walk (the ‘Riverside Terrace’) which would extend from the Maltings Plaza along the frontage of the new buildings within

Development Area 1. These works, along with the proposed works to upgrade the existing towpath and the provision of a new flood wall, would help to enliven and activate the riverside space.

- 4.9 A new 'high street', to be known as 'Thames Street', is proposed on this part of the site and would run parallel to Mortlake High Street/Lower Richmond Road. This area would provide restaurants, cafés, retail, community, leisure and office spaces and it is envisaged that many of these uses would provide outdoor seating and amenity areas. Thames Street would be fully pedestrianised, with very limited vehicle access (for servicing and emergency use only).
- 4.10 To the south of Thames Street the Former Hotel Building and the Former Bottling Building (blocks 5 and 6) would be redeveloped behind a retained façade to provide offices, a gym, flexible commercial space and a small hotel / pub with rooms. The new 'Bottleworks Square' public space behind these blocks would provide an attractive and functional public space which would complement the commercial uses.
- 4.11 The scheme also proposes a new cinema which would be located adjacent to the proposed new green link.

4.12 At this stage, and to ensure flexibility, ground floor elements of various buildings on the eastern side of Ship Lane are proposed for flexible uses as detailed in Table 3 below. To avoid over-dominance of any particular use, maximum capped floorspaces within each use class are proposed, as detailed in section 11 of this Town Planning Statement.

Block Number (refer to plan ref C645_MP_P_00_001, included at Appendix A)	Flexible Uses Proposed		
	Floors	Uses (By Use Class)	Floor Areas (GIA sqm)
2	Ground	A1 / A2 / A3 / A4 / B1	670
4	Ground	A1 / A3 / A4 / B1 / D1	468
5	Ground (part)	A1 / A2 / A3 / A4 / B1	568
6	Ground	A1 / A2 / A3 / A4 / B1	449
7	Ground	A1 / A2 / A3 / A4 / B1	630
8	Ground	A1 / A2 / A3 / A4 / B1	518
9	Ground	A1 / A3 / A4 / B1 / D1 / Boathouse	351
10	Ground	A1 / A2 / A3 / A4 / B1 / D1	329
11	Ground	A1 / A2 / A3 / A4 / B1	327
12	Ground	A1 / A2 / A3 / A4 / B1	354
<b>Total Flexible Space</b>			<b>4,664</b>

**Table 3: Flexible Uses Proposed**

4.13 Within the flexible use floorspace overall amount, caps for each land use are proposed as shown in table 4.

Land Use	Maximum Cap for Flexible Floorspace*
Retail (Class A1)	2,500sqm
Financial and Professional services (Class A2)	200 sqm
Cafes/restaurants (Class A3)	2,200 sqm
Drinking establishments (Class A4)	1,600 sqm
Offices (Class B1)	2,000 sqm
Community (Class D1)	1,148 sqm
Boathouse (Sui Generis)	351 sqm

**Table 4: Maximum caps for flexible floorspaces by land use**

\* The combined total of these uses would not be able to be implemented, as the maximum cap for the flexible floor areas would be controlled via the overall floorspace cap, i.e. 4,664sqm (GIA)

4.14 A 'High Street Zone' within Development Area 1 has been identified, comprising some of the overall flexible use space (see plan ref. G100\_P1\_P\_TY\_001 included at Appendix A). The High Street Zone should comprise a significant proportion of A1 retail use within its overall flexible use floorspace and, as such, it is proposed to set a minimum cap (50%) of High Street Zone floorspace being used for A1 retail.

4.15 Development Area 1 would deliver 443 residential units which would generally be delivered at first floor and above in mixed use buildings, aside from block 3 which is residential only.

4.16 In terms of access, pedestrian and cycle access routes would be created throughout, and would link the eastern part of the site to the western part of the site (and beyond), Mortlake Green and from Mortlake. A single storey basement is proposed to be constructed under Development Area 1 and car and cycle parking



for the residential and non-residential uses would be located here, along with plant including an energy centre which would service this part of the Site. Access to the basement would be via Ship Lane (two way entry/exit) and Mortlake High Street (two lane entry, left turn exit only).

- 4.17 The eastern side of the site would provide 11 new buildings (12 in total including the Maltings Building) ranging from 3 to 8 storeys. There are no full 8 storey buildings proposed but 3 buildings would be provided with ‘turret’ style accommodation providing single residential units at the 8<sup>th</sup> storey. Every other building would be 7 storeys or lower. Broadly speaking, the design of the buildings follows two typologies – mansion block and warehouse. Further details on the proposed design can be found within section 13 of this Town Planning Statement and within the submitted Design and Access Statement, prepared by Squire & Partners.

#### *Development Area 2*

- 4.18 Development Area 2 is located on the western side of Ship Lane and is applied for in outline. This part of the Site would have a different character and environment from the more mixed-use eastern part of the site; it would be more residential in character with less activity, resulting in a calmer, quieter space.
- 4.19 Blocks 18 and 19 would comprise residential apartments and blocks 20 and 21 would provide a terrace of town houses. All residential accommodation would have amenity space in the form of private gardens for town houses and courtyard amenity space (publicly accessible) for the apartments.
- 4.20 Accommodation and services for an older population is proposed. Blocks 14 and 15 would provide a dedicated nursing and care home of up to 80 en-suite rooms with associated communal and staff facilities.
- 4.21 Blocks 13, 16 and 17 are proposed to provide up to either 150 assisted living units or up to 150 residential units. If the units were to come forward as assisted living units, an element of on-site care would be provided for the residents.
- 4.22 A single storey basement would extend under blocks 15, 16, 17, 18, 19 and part of block 13 and would provide car and cycle parking for the residential uses alongside

plant, including an energy centre which would serve this part of the Site (but not the school or the townhouses, which would be serviced separately). The basement would be accessed from the west of Ship Lane.

- 4.23 In total, Development Area 2 would deliver 9 new buildings which range in height from 3 storeys to 7 storeys, as shown on the planning application drawings. As these blocks are proposed in outline, the design detail has not been developed to the same level of detail as those blocks on the eastern part of the Site.
- 4.24 This portion of the Site would also deliver a significant amount of publicly accessible open space, the largest being the new community park which would be provided to the south of the new school play facilities, to the north of Lower Richmond Road. This park would provide playspace for children as well as amenity space for new and existing Mortlake residents.

#### **Application B – Detailed Application – School**

- 4.25 To the west of block 15 it is proposed to deliver a new three storey six form entry secondary school (Application B), which would accommodate approximately 1,200 students and has been designed in accordance with ESFA standards. Associated play facilities would be provided which include roof informal play facilities, an indoor sports hall, an external Multi Use Games Area ('MUGA') and a full sized outdoor artificial playing pitch and associated spectator spaces. The school, which will implement a Travel Plan (submitted as part of Application B), will have a limited amount of car parking, located at grade level.
- 4.26 The external playing pitch is proposed as a 3G surface in order to meet the requirements of the ESFA for intensive school use and also to enable community use outside of school hours. There is an identified unmet demand for these types of pitches in the Borough which will allow for a range of sports and games to be played on a high quality, versatile and robust surface all year round. The pitch would be floodlit which would enable use into the evenings (as detailed within the submitted Lighting Masterplan). There would also be a Community Use Agreement which would enable local community and sports groups to use the facilities out of school hours (a draft Agreement has been submitted alongside this application, and included within the submitted Open Space and Playing Pitches Assessment). This

Agreement would also apply to the internal facilities within the school. The plans for the sports facilities, in particular the external 3G playing pitch, have been developed in close consultation with Sport England, the Football Association and local sports groups. Further detail on this element of the proposals can be found in the submitted Open Space and Playing Pitches Assessment ('OSPPA'), prepared by Gerald Eve LLP, and supporting appendices.

- 4.27 As detailed in section 15 of this Town Planning Statement, interim infrastructure works are proposed as part of Application B in the event that the school comes forward independently of Application A. This would enable the school to be operational as soon as possible. The permanent road works would be secured via the Reserved Matters submissions associated with the outline elements of Application A. Further details can be found within the submitted Transport Assessment and the Design and Access Statement Volume 4: Secondary School Design (submitted with Application B).

#### **Land Use – Summary**

- 4.28 A summary of the quantum of land uses as shown on the submitted plans for Applications A and B is set out as in Table 5 as follows:

<b>Land Use</b>	<b>Proposed GIA sqm</b>
<b>Application A – Hybrid Application (Detailed Elements, Development Area 1) – Mixed Use Scheme</b>	
Residential	443 residential units
Flexible uses	4,664 sqm
Offices	2,424 sqm
Cinema	2,120 sqm
Gym	740 sqm
Hotel/pub with rooms	1,668 sqm
Basement car park	19,759 sqm

<b>APPLICATION A DETAILED ELEMENTS SUB-TOTAL</b>	<b>81,522 sqm (including residential)</b>
<b>Application A – Hybrid Application (Outline Elements, Development Area 2) – Mixed Use Scheme</b>	
Residential	Up to 224 units
Flexible use living accommodation for either assisted living or residential use	Up to 150 units
Nursing and care home	Up to 80 en-suite rooms
Basement car park	Up to 11,986 sqm
<b>Application B – Detailed Application – School</b>	
School	9,319 sqm
<b>APPLICATION B SUB-TOTAL</b>	<b>9,319 sqm</b>

Table 5: Proposed Area Schedule

### Application C – Detailed Application – Chalkers Corner

- 4.29 It is proposed to amend and reconfigure the Chalkers Corner junction as part of highway mitigation works required by the development (Applications A and B). Works to the vehicle intersections and road layout are proposed to help with traffic flows. Public realm and landscaping works are also proposed, including the creation of a new cycle lane and the provision of a new pocket park, trees and new paving. The works are described in full in the submitted Transport Assessment, prepared by Peter Brett Associates ('PBA') and the Landscape Strategy, prepared by Gillespies. These works are essential to make the development acceptable in highways terms.
- 4.30 As part of the Chalkers Corner highway improvements, a small element of the existing Other Open Land of Townscape Importance ('OOLTI') and some existing trees would be lost to facilitate the highway reconfiguration. To mitigate against this, new open space (OOLTI compliant) is proposed, together with new tree planting (net increase in trees overall) as described in detail in section 8 of the OSPPA, prepared by Gerald Eve LLP and the Landscape Design and Access Statement (for

Application C), prepared by Gillespies.

### **Other Highway Works**

- 4.31 Aside from the Chalkers Corner works, a range of associated highways works are proposed to existing roads surrounding the site. Some of these works are coming forward within the planning application for Application A (and included with the red line) and some works are proposed to be secured and delivered through a section 278 agreement which would be secured via the section 106 legal agreement which would be linked to the delivery of Applications A and B.
- 4.32 A full description of all highways works proposed is included within the submitted Transport Assessment, prepared by PBA.

### **Illustrative Works**

- 4.33 The scheme identifies potential works to Mortlake Green, shown illustratively in the application documentation which would assist in providing better pedestrian connection routes from Mortlake rail station to the Site.
- 4.34 These potential works are set out in greater detail in the submitted Landscape Design and Access Statement, prepared by Gillespies.
- 4.35 These works do not form part of these Applications and are not essential to the scheme. However they are included to illustrative an alternative approach to integrate the scheme with Mortlake Green.

### **Phasing**

- 4.36 Given the scale of the masterplan, deliverability and construction would take place in phases. The approach to construction is to ensure timely and efficient delivery of the scheme in a manner which minimises construction periods and impacts on the local community. Of key importance is that the school must be delivered in an early phase, as LBRuT has advised that the need for secondary school places is pressing. Where feasible, phases would be delivered in conjunction with one another to reduce construction timeframes. The Framework Construction Method

Statement, prepared by Aecom and the 'Development Programme, Demolition, Alteration, Refurbishment and Construction' Chapter within the ES (Chapter 6), prepared by Waterman IE, provide further details of the proposed construction processes and programme.

## 5 Site and Surroundings

- 5.1 This section describes the Site's location and context in greater detail. Three applications have been submitted and the full extent of the application boundaries is shown within the red line boundary plans – plan ref. C645\_Z0\_P\_00\_001 included at Appendix A shows the extent of the boundaries for Applications A, B and C.
- 5.2 The Site is located within the London Borough of Richmond Upon Thames ('LBRuT') and comprises two parts:
- a) The former Stag Brewery which sits between Lower Richmond Road and the river Thames, to the north of Mortlake Green (Applications A and B); and
  - b) Land at Chalkers Corner (Application C).
- 5.3 These elements are described in greater detail below.

### **Former Stag Brewery (Applications A and B)**

#### *Site Description*

- 5.4 The former Stag Brewery Site occupies a 9.25 ha site which is bounded by Lower Richmond Road to the south, the river Thames and the Thames Bank to the north, Williams Lane to the east and Bulls Alley (off Mortlake High Street) to the west. The Site is bisected by Ship Lane, which runs in a north-south direction, between the Jolly Sailor public house on Lower Richmond Road and the Ship public house on Thames Bank.
- 5.5 The Site currently comprises a mixture of large scale industrial brewing structures dating from the late twentieth century, a number of nineteenth and early twentieth century structures, large areas of concrete or tarmac hardstanding and playing fields. The existing floorspace on Site comprises 35,402 sqm (GIA). The Stag Brewery Site was sold by AB InBev in December 2015 as it was surplus to the company's requirements and brewing operations were winding down. The Site was purchased by Reselton Properties Limited. In 2017, a major programme of decommissioning works was undertaken on Site, and this was carried out until October 2017.

- 5.6 The existing playing fields measure approximately 2.06 ha and were originally owned and used by workers of the Stag Brewery. The pitches remain in private use with no access to the general public. Through agreement with the Applicant, the playing pitches are used by Barnes Eagles for matches and training at weekends, by Thompson House School for sports and games on Tuesday afternoons and by St. Mary Magdalen School once a year for sports day. Full details of the current arrangements are included within OSPPA, prepared by Gerald Eve LLP and submitted in support of the applications.
- 5.7 To the east of Ship Lane, the Stag Brewery Site is surrounded by a large wall, which blocks the ground floor from street views. To the west of Ship Lane elements of the Site are still enclosed by walls in some places, and in others (for example, along the side of the playing fields), fences mark the boundary lines instead.
- 5.8 To the north of the Site there is an existing towpath which runs between Ship Lane and Bulls Alley. This area forms part of the Application A boundary. The towpath is publicly accessible although at times (high tide) it is flooded to the Site edge and therefore inaccessible.

#### *Heritage*

- 5.9 A small section of the Site running along Mortlake High Street and the Thames shoreline is located within the Mortlake Conservation Area. The Site is directly opposite the Mortlake Green Conservation Area to the south and the Grove Park Conservation Area to the north, on the opposite side of the river (within London Borough of Hounslow).
- 5.10 Three buildings within the Stag Brewery Site are identified by LBRuT as Buildings of Townscape Merit, as follows:
- a) The Former Maltings Building, which is located on the banks of the Thames;
  - b) The Former Bottling Plant (also referred to as 'the Former Bottling Building'), which is located on the junction of Mortlake High Street and Lower Richmond Road; and
  - c) The Former Hotel Building, which is located adjacent to the former Bottling



building on Mortlake High Street.

- 5.11 Parts of the surviving boundary walls which surround part of the Stag Brewery Site are also considered by LBRuT to contribute to the character of the Conservation Area and form a surviving element of the pre-nineteenth century brewery. Historic gates, two memorial plaques and timber river moorings are also present on the Site.
- 5.12 The following listed buildings and structures are within the immediate vicinity of the Stag Brewery Site:
- a) Thames Cottage, Tudor Lodge, Thames Bank House, Leyden House and Riverside House, all Grade II listed and all located along Thames Bank, to the north west of the Stag Brewery Site;
  - b) The garden wall to the east of number 1 to 8 Riverside House and extending behind numbers 1 to 24 Reid Court which is Grade II listed and located along the north east boundary of the Site, but not within the application boundary;
  - c) The gateway (formerly to Cromwell House), located at the northern end of Williams Lane, which is Grade II listed and directly to the west of the Stag Brewery Site; and
  - d) Chiswick Bridge and attached balustrades, Grade II listed, situated to the north west of the Site.
- 5.13 There are also a number of identified Buildings of Townscape Merit within close proximity to the Site including:
- a) The Jolly Gardeners Pub, located on the corner of Lower Richmond Road and Ship Lane;
  - b) The Ship Pub, located at the corner of Ship Lane and the Thames Bank;
  - c) The Old Stables, Thames Bank;
  - d) 6 and 7 Thames Bank; and
  - e) 1-14 Parliament Mews.

#### *Site Designations and Transport Rating*

- 5.14 The Site is subject to the following Site designations, as shown on LBRuT's Policies Map (July 2015):

- a) Area of Mixed Use (whole Site);
- b) Other Open Land of Townscape Importance ('OOLTI') (playing fields only);
- c) Thames Policy Area (along the river edge);
- d) Mortlake Conservation Area (eastern portions of the Site only);
- e) Local view and vista/landmark (from Chiswick Bridge east along the river edge and from The Ship looking east towards the Maltings Building);
- f) Site Allocation S4: Budweiser Stag Brewery (east of Ship Lane only);
- g) Public Open Space (towpath only); and
- h) Within the Mortlake and Barnes Archaeological Priority Area ('APA').

5.15 The Site is not within any designated London View Management Framework (2012) views but is within locally designated views.

5.16 The Stag Brewery Site is subject to the adopted SBPB (July 2011). The SBPB provides guidelines on future uses, layout and design for the redevelopment of the Site and is a material consideration in the determination of any planning application relating to the Site. Within LBRuT's emerging Local Plan (January 2017) the Site Allocation has been extended to apply to the whole of the Stag Brewery Site (Draft Policy SA 24).

5.17 In terms of accessibility, the majority of the Stag Brewery Site has a PTAL rating of 2 (poor), with a section of the Site classified as PTAL 1 (very poor). However, as noted in the submitted Transport Assessment, the PTAL 1 rating does not take into account existing bus services and it has been agreed with TfL that the PTAL rating for the whole Site should be PTAL 2. Mortlake railway station is located within a 5 minute walk to the Site and provides links to central London and Richmond. The Ship Lane Stag Brewery bus stop is located directly outside the Site on Lower Richmond Road. Bus numbers 419 and N22 serve this stop.

5.18 The Site is not subject to any other London Plan designations.

### **Land at Chalkers Corner (Application C)**

5.19 Chalkers Corner sits at the junction of Clifford Avenue and Lower Richmond Road, and is adopted public highway land controlled by LBRuT. To the north of the junction is Chertsey Court, a residential block of flats. Currently, Chertsey Court is separated

from the junction by some tarmacked car parking area and a small area of green space, which is designated as OOLTI.

- 5.20 To the south of the junction, on the corner, there is an area of tarmacked informal car parking space.
- 5.21 The area of land within the Chalkers Corner Application C red line boundary (see plan ref. C645\_Z0\_P\_00\_001) is subject to the following Site designations as shown on LBRuT's Policies Map (July 2015):
- a) OOLTI (relates only to a small area of land between Chertsey Court, Lower Richmond Road and Clifford Avenue, measuring approximately 0.17ha);
  - b) Primary or Secondary Road; and
  - c) Local distributor road.

### **Surrounding Area**

- 5.22 The Site is situated between Chiswick Bridge to the east and Barnes Bridge to the west, and within the Mortlake Village boundary, as identified by the Mortlake Village Planning Guidance SPD (December 2015). Mortlake Village is made up of local commercial and community uses with residential use throughout. The main commercial focus is in the historic core of the village, at the eastern end of Mortlake High Street. Mortlake village centre close to the Site and comprises local shops and services and employment uses. Directly to the south of the Site sits Mortlake Green, an important local green space within Mortlake.
- 5.23 Richmond town centre and Kew are located to the east of the Site, East Sheen is to the south (and is the closest designated District Centre to the Site) and Barnes town centre is to the west of the site. Directly opposite the Site, across the River Thames, is Dukes' Meadow Golf & Tennis sports venue, which is located within the London Borough of Hounslow.
- 5.24 The context of the surrounding area is varied in terms of scale, context and materials as a consequence of gradual historic evolution. The Mortlake Conservation Area, which covers part of the Site, is described as having been derived principally from its relationship with the River Thames and is composed of

three distinct sub-areas: 'Thamesbank', 'Mortlake Riverside' and 'The Village'.

- 5.25 The Mortlake Green Conservation Area is described as “*an area of late Victorian and early Edwardian buildings which have an identifiable industrial character although many are different in style*”. The scale of the buildings within this area is from two to four storeys. The buildings consist of predominantly residential terraced houses and cottages around the Green as well as a number of buildings of social and architectural importance including the railway station, Railway Tavern on Sheen Lane and the Jolly Gardeners and Tapestry public houses that form a 'gate' to the Green on Lower Richmond Road.

## 6 Relevant Planning History

6.1 This section provides an overview of the Site's historical development and the relevant planning applications at the Site.

### Site History – Overview

6.2 The Site has a long-standing history of industrial use, incorporating a variety of engineering operations and production processes. Most recently, these include various phases of installation, decommissioning and deconstruction of industrial equipment in situ (as well as related office, security, storage and marshalling uses). No parts of the Site have been the subject of any change of use from that established composite lawful use.

6.3 The Mortlake Brewery was founded in 1487. By the end of the 19<sup>th</sup> century the brewery had expanded, particularly to the west, and much of the Stag Brewery Site to the east of Ship Lane had been developed, with new structures including the Former Hotel Building and the Former Bottling Building.

6.4 At the beginning of the 20<sup>th</sup> century, a large eight and part nine storey Maltings was constructed, as well as other new and larger structures which faced the river.

6.5 Following the Second World War, the majority of the 19<sup>th</sup> and early 20<sup>th</sup> century buildings within the Stag Brewery Site were demolished to facilitate the modernisation of the brewery. Only the Maltings building, Former Hotel Building and the Former Bottling Building, and parts of the former boundary walls remain.

6.6 A new bottling and packing building was constructed in the 1990s.

6.7 Large buildings were also constructed on the part of the Site that is currently occupied by private sports fields.

6.8 Brewing at the Site ceased in late 2015 and since this time decommissioning and deconstruction works have taken place on Site, continuing the lawful use of the Site. These works were continued until October 2017.

## Planning History – Application Details

6.9 Key planning applications available online are referenced below. Complete planning history schedules for the former Stag Brewery Site (Applications A and B) and Chalkers Corner (Application C) are included at Appendix B.

6.10 On 17 October 1977 planning permission (ref: 77/0459) was granted for the following:

*“Demolition of the existing sports pavilion and the erection of new building for the conditioning/storage and distribution of beer; erection of new sports pavilion incorporating flat.”*

6.11 On 2 May 1979 planning permission (ref: 79/0215) was granted for the following:

*“Extension for housing compressors, yeast tanks and small office, provision of frame and cladding for housing balloon.”*

6.12 On 11 March 1986 planning permission (ref: 85/1292) was granted for the following:

*“Extension to beer conditioning building for production and distribution of beer. (Amended Plan No. 100/374/6 received on 15.11.85; and additional plan 866/1A received 30.12.85).”*

6.13 On 16 March 1995 planning permission (ref: 94/3216/FUL) was granted for the following:

*“Erection of new bottling plant”*

6.14 On 13 April 1995 planning permission (ref: 95/1625/FUL) was granted for the following:

*“Erection of a bottling hall, storage and administrative building and a 6.2m high wall (in part) adjacent to the towpath”*

6.15 On 26 May 1999 planning permission (ref: 99/0786) was granted for the following:

*“Development comprising the relocation of an existing tank for the storage of sodium*

*hydroxide used in the operations of the brewery. Extension of bounded area.”*

- 6.16 On 15 April 2004 planning permission (ref: 04/0134/FUL) was granted for the following:

*“Extension and alteration to roof and rear of the existing administration block with associated works including bridge link between proposed extension and Brewhouse.”*

## 7 Consultation and Community Engagement

- 7.1 The Localism Act 2011 emphasises the need to involve and engage with the local community during the planning process.
- 7.2 The National Planning Policy Framework ('NPPF') confirms that *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community”* (paragraph 188).
- 7.3 In addition, paragraph 190 of the NPPF notes that *“the more issues that can be resolved at pre-application stage, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists LPAs in issuing timely decisions, helping to ensure that Applicants do not experience unnecessary delays and costs”*.
- 7.4 The proposals have been subject to extensive pre-application discussions with LBRuT planning, design, highways and other officers since spring 2016. Detailed pre-application discussions have also taken place with the Greater London Authority ('GLA') and Transport for London ('TfL') since January 2017.
- 7.5 The Applicant has been involved in a comprehensive programme of consultation and engagement with the local community since the installation of a pop-up at Mortlake Fair on 25 June 2016, shortly after Reselton's acquisition of the Site. Extensive consultation has taken place directly with local residents and local stakeholders. This consultation has taken the form of two public exhibitions (held in March and June 2017), smaller group meetings with the Community Liaison Group ('CLG') and one-on-one meetings with residents and local groups.
- 7.6 The list of consultees includes the following:
- a) LBRuT planning, design, highways and other officers;
  - b) GLA officers;
  - c) TfL officers;



- d) LBRuT Councillors;
- e) Local community via public exhibitions, CLG meetings and presentations and one-on-one meetings;
- f) ESFA;
- g) Sport England;
- h) The Football Association;
- i) The Football Foundation;
- j) Network Rail;
- k) South-West Trains;
- l) The Port of London Authority ('PLA');
- m) The Environment Agency;
- n) The National Health Service;
- o) Richmond Clinical Commissioning Group;
- p) The Greater London Archaeology Advisory Service ('GLAAS');
- q) The Mortlake Brewery Community Group ('MBCG');
- r) Thames Bank, Barnes and Mortlake History Society representatives;
- s) Thomson House School parents;
- t) The Towpath Group/West London River Group; and
- u) Three Registered Providers (Paragon Asra. Richmond Housing Partnership and Thames Valley Housing Association).

7.7 The proposals have evolved significantly throughout the pre-application process in direct response to comments raised by consultees. Significant amendments have been made to the design, layout and quantum of development as a result of these pre-application discussions, especially:

- a) The location of the school building;
- b) The location, size and form of the green link;
- c) The scale and extent of proposed transport and highways works;
- d) Building heights and design; and
- e) Quantum of development.

7.8 The consultation process is set out and explained in full in the submitted Statement of Community Involvement ('SCI'), prepared by Soundings.

**7.9 The final masterplan is the result of an extensive period of ongoing**

**consultation with relevant local groups, stakeholders and decision-making bodies. Significant amendments have been made to the scheme as a result of these discussions. The scheme therefore complies with the Localism Act's duty to engage with the local community during the planning process.**

## 8 Planning Policy Framework

### Legislation

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out the requirement for planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.2 In addition to the requirement of Section 38(6) of the Planning and Compulsory Purchase Act 2004, LBRuT has a legal duty under Sections 66 & 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, to have special regard to the desirability of preserving listed buildings or their settings, and to pay special attention to the desirability of preserving or enhancing the character and appearances of conservation areas.

### Adopted Planning Policy

#### *National*

- 8.3 The National Planning Policy Framework ('NPPF') published in March 2012 sets out the Government's economic, environmental and social planning policies for England and supersedes the vast majority of Planning Policy Guidance Notes and Planning Policy Statements. It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 8.4 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
- 8.5 The NPPF establishes the presumption in favour of sustainable development. Specifically, paragraph 19 states that the planning system should do all that it can to promote sustainable economic growth in order to create jobs and prosperity and

meet the challenges of global competition alongside a low carbon future. The NPPF states that significant weight should be placed on the need to support economic growth through the planning system.

*Planning Practice Guidance*

- 8.6 In March 2014, the Department for Communities and Local Government (DCLG) launched the web-based Planning Practice Guidance ('PPG') resource. This aims to provide guidance which is useable in an up-to-date and accessible manner.
- 8.7 With regard to decision taking, the PPG is a material consideration in the determination of planning applications.

*Regional*

- 8.8 The London Plan (2016) is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London. The aim of the London Plan is to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the statutory development plan.
- 8.9 The growth and management of the city form the major challenge and overarching concern of the London Plan, and are prioritised in order to allow London to excel among global cities within the context of significant rates of development and population increases. The detailed objectives of the Plan seek to ensure that London can meet the challenges of economic and population growth; be internationally competitive and successful, deliver diverse, strong, secure and accessible neighbourhoods; be world-leading in improving the environment; and be easy, safe and convenient for everyone to access, jobs, opportunities and facilities.
- 8.10 The following GLA Supplementary Planning Guidance ('SPG') documents have also been considered and the provisions taken into account in the evolution of the masterplan:
  - a) Housing SPG (2016);

- b) Culture and Night-Time Economy (2017);
- c) Social Infrastructure (2015);
- d) Play and Informal Recreation (2012)
- e) Planning for Equality and Diversity in London (2007)
- f) Affordable Housing and Viability SPG (2017)
- g) Draft London Housing Strategy (2017)
- h) Shaping Neighbourhoods: Character and Context (2014);
- i) Shaping Neighbourhoods: Play and Informal Recreation SPG, (2012);
- j) Accessible London: Achieving an Inclusive Environment SPG (2014);
- k) London's Foundations SPG (2012);
- l) Character and Context SPG (2014);
- m) Sustainable Design and Construction SPG (2014);
- n) Mayor's Air Quality Strategy SPG (2010);
- o) London Regional Flood Risk Appraisal – First Review (2014);
- p) Land for Industry and Transport (2012); and
- q) The Control of Dust and Emissions During Construction and Demolition (2014).

### *Local*

- 8.11 The Core Strategy (2009) and the Development Management Plan ('DMP') (2011) are the adopted local planning policy documents for LBRuT. The Core Strategy outlines the vision, spatial strategy and core planning policies for the Borough over a 15 year plan period. The DMP includes the detailed policies which will be used when new developments are considered, and is consistent with the core planning principles contained within the Core Strategy. These documents replaced the majority of LBRuT's Unitary Development Plan ('UDP') (2005) however some proposal sites remain saved, including the Stag Brewery Site Allocation (S4), which relates to the eastern part of the Site only (east of Ship Lane).
- 8.12 As previously explained within this Town Planning Statement, the Stag Brewery Site is the subject of the SBPB (July 2011), which sets out key planning objectives and design guidance for a comprehensive redevelopment of the Site. The emerging Local Plan (2017) also includes a Site Allocation (Policy SA 24) which echoes these objectives and allocates the Stag Brewery Site for mixed use development.

8.13 LBRuT also has a number of Supplementary Planning Documents ('SPDs') and SPGs which provide guidance on LBRuT planning policies and have been considered for these Applications:

- a) Mortlake Village Plan (2015);
- b) Affordable Housing (2014);
- c) Buildings of Townscape Merit (2015);
- d) Design Quality (2006)
- e) Planning Obligations (2014);
- f) Refuse and Recycling Storage Requirements (2015)
- g) Residential Development Standards (2010);
- h) Sustainable Construction Checklist (2016);
- i) Conservation Areas (2005);
- j) Contaminated Land (2003);
- k) Design for maximum access;
- l) Housing Optional Technical Standards Update (2015);
- m) Historic Buildings – Maintenance and Repair (2005);
- n) Nature Conservation and Development;
- o) Planning Guidance for food and drink establishments;
- p) Security by Design (2002); and
- q) Trees: Landscape Design, Planting and Care (1999).

8.14 Both the Mortlake Green Conservation Area Statement and the Mortlake Conservation Area Statement are also of relevance to these development proposals and have been considered in developing the masterplan.

### **Emerging Planning Policy**

#### *Regional*

8.15 The emerging London Plan was published on 27 November 2017. The document is out for public consultation until 2 March 2018. Currently, the GLA are targeting the document's Examination in Public for autumn 2018 and adoption in autumn 2019. Given that the draft Plan has not yet completed its first stage of public consultation, it holds very limited weight.

*Local*

- 8.16 There is also emerging policy in the form of the new LBRuT Local Plan, which is in the advanced stages of preparation. The emerging draft Local Plan was submitted to the Secretary of State on 19 May 2017 and following the independent examination in public, is targeted for adoption in spring 2018.
- 8.17 Once adopted, the new Local Plan will supersede the Core Strategy and the DMP as the adopted local planning policy document for LBRuT.
- 8.18 The Local Plan will set out policies and guidance for the development of the Borough to 2033. The policies as set out in the emerging Local Plan follow the approach of the presumption in favour of sustainable development as set out within the NPPF and show how it is expressed locally.
- 8.19 Given the advanced stage of the emerging Local Plan it is a material consideration and should be given significant in the determination of this planning application.

## 9 Planning Considerations – Principle of Redevelopment

- 9.1 The principle of comprehensive mixed-use development at the Stag Brewery Site accords with policies and guidance at all levels, which seeks to bring forward appropriate sites, in appropriate locations for residential-led mixed-use development. At the local level, the adopted SBPB and emerging Local Plan development allocation (Policy SA 24) contain detailed information in respect of the form of development that should be delivered at the Site.
- 9.2 There are three main considerations relevant to determining if the proposed development, the subject of these planning Applications, is acceptable in principle. These are:
- a) Are there existing physical and/or environmental constraints that would prevent the Site being redeveloped?
  - b) Does the proposed redevelopment meet the requirements and expectations of land use planning policy at all levels?
  - c) Is the loss of the existing (former) use acceptable in land use principle terms?

### Policy Context

- 9.3 At the heart of the NPPF is a presumption in favour of sustainable development which meets social, economic and environmental needs. One of the core principles in the NPPF (paragraph 17) is that planning should encourage the effective use of land by reusing land which has been previously developed (brownfield land). The NPPF also promotes mixed-use developments, and encourages patterns of growth which focus significant development in locations which are, or can be made, sustainable.
- 9.4 London Plan housing policies (Policies 3.3 and 3.4) seek to deliver significant housing across all of London's Boroughs and require developments to optimise housing output having regard to local context and character. Policy 3.7 relates specifically to large residential developments and states that large residential developments which include complementary non-residential uses are encouraged in areas of high public transport accessibility. Where these include more than 500



dwellings, they should be progressed through a plan-led process to encourage higher densities and coordinate the provision of social, environmental and other infrastructure and create neighbourhoods with a distinctive character.

- 9.5 At the local level, LBRuT Core Strategy Policy CP 17 and emerging Local Plan Policy LP 30 encourage developments which promote health and wellbeing, through following the principles of sustainable development and delivering inclusive development alongside sustainable modes of travel, green spaces, and social infrastructure.
- 9.6 In line with the above policy framework, LBRuT have adopted a plan-led approach to deliver a comprehensive mixed-use development at the Stag Brewery. The SBPB was adopted as SPG in 2011, following extensive local community consultation. That document sets out the key planning objectives and aspirations for a comprehensive mixed-use development at the Site.
- 9.7 LBRuT’s emerging Local Plan contains a site-specific development allocation for the Site, promoting its comprehensive mixed-use redevelopment. The draft allocation states:

*“The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or re-provision and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space to link to the riverside.”*

## Assessment

*a) Are there existing physical and/or environmental constraints that would prevent the Site being redeveloped?*

9.8 These planning applications, and the various accompanying assessment reports (including the ES) conclude that there are no in-principle reasons (for example relating to physical constraints, contamination, flood risk, archaeology, ecology and other environmental constraints) why the Site could not be developed. It constitutes previously-developed land in a sustainable location.

9.9 Matters such as the above would have been considered and taken into account by LBRuT before progressing and adopting a site-specific development brief and a Local Plan development allocation policy. These policies confirm that the Site's redevelopment is acceptable in principle.

*b) Does the proposed redevelopment meet the requirements and expectations of land use planning policy at all levels?*

9.10 In accordance with the provisions of the NPPF, the proposal constitutes effective use of previously-developed land in a sustainable location for a comprehensive mixed-use redevelopment proposal. The scheme would deliver significant social, economic and environmental regeneration benefits as described in the application supporting documentation.

9.11 At a strategic level, the masterplan proposal would contribute significantly towards meeting London Plan aims and objectives in respect of housing delivery in the Borough of Richmond-upon-Thames. Complementary non-residential uses are integrated within the proposed masterplan, to ensure a truly mixed-use development and one which makes the most efficient and effective use of land and optimises housing output having regard to local character and context. Importantly, the scheme has evolved and been designed following a plan-led approach, and in close collaboration with key stakeholders over a significant period.

9.12 At the local level, full regard has been had to the provisions contained within the adopted SBPB and, more recently, the emerging Local Plan policy development

allocation.

- 9.13 All aspects of the emerging Site Allocation (Policy SA 24) is satisfied by the scheme planning application submission. Subsequent sections of this Town Planning Statement (and other submitted documentation) explain in detail how the aims, objectives and requirements of the policy allocation would be delivered by the proposals. The table below summarises why the proposed development is acceptable in principle, against the various requirements of the draft policy (emerging Local Plan Policy SA 24).

Policy element	Scheme response	Scheme acceptable in principle?
<p>“The Council will support the comprehensive redevelopment of this site”.</p>	<p>The proposal has been designed comprehensively as opposed to in a piecemeal format. The planning applications would be linked to ensure delivery of all aspects.</p>	<p>Yes</p>
<p>“An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake”.</p>	<p>The entire eastern portion of the Site (Development Area 1) contains a series of buildings which comprise a mix of uses at ground floor level. Flexible floorspace is proposed for the majority of ground floor spaces to ensure a rich and vibrant mix. In addition, a wide mix of other employment-generating uses are proposed. Buildings are arranged around a new ‘High Street’ to ensure that the development delivers a new heart and centre for Mortlake.</p>	<p>Yes</p>

<p>“The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required”.</p>	<p>The proposal includes a new 6-form entry secondary school plus sixth form on site (Application B), designed to required standards and criteria, and with appropriate levels of indoor and outdoor play and sports provision. This element of the development would be delivered as an early phase to meet identified demand.</p>	<p>Yes</p>
<p>“Appropriate uses, in addition to educational, include”...</p>	<p>n/a</p>	<p>n/a</p>
<p>Residential (including affordable housing)</p>	<p>The scheme proposes residential dwellings, a proportion of which would be designated affordable housing.</p>	<p>Yes</p>
<p>Employment (B uses)</p>	<p>The scheme includes dedicated B1(a) office employment use, plus flexible floorspace (which allows for additional B1 office use).</p>	
<p>Commercial such as retail and other employment generating uses</p>	<p>The scheme includes flexible use floorspace which includes provision for A1 retail use, along with other employment generating uses such as A2, A3, A4, D1 and D2 use. In addition, other dedicated employment generating uses are included such as cinema, gym and hotel / public house with rooms.</p>	<p>Yes</p>

Health facilities	The scheme includes a dedicated care and nursing home and provision for up to 150 assisted living homes.	Yes
Community and social infrastructure facilities (such as a museum)	D2 use is included within the flexible floorspace applied for. It is envisaged that a local community rowing club would occupy the ground floor of block 9 and a shared community space, potentially including a museum element, would occupy the ground floor of block 4 (the Maltings Building).	Yes
River-related users, sport and leisure uses	The proposals include a new 3G full size football pitch, indoor and outdoor sports and games areas (available for shared community use), pubs and restaurants, gym, cinema and boathouse for a community rowing club.	Yes
“Retention and/or re-provision and upgrading of the playing field”.	The proposals include provision for a new floodlit 3G full size football pitch to enable a significant increase in sports use and sports benefits.	Yes

<p>“The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside”.</p>	<p>Significant areas of high quality open space and public realm are proposed as part of the development. Total overall green space proposed amounts to over 3 ha space, and total overall publicly accessible amenity and open space is almost 4 ha space.</p> <p>A series of key links through the Site are proposed which link the Site with Mortlake Green through to the River Thames. East-west links are proposed to integrate the Site with the existing surrounding streetscape and provide a new ‘High Street’. The landscape strategy for the development as a whole seeks to maximise pedestrian and cyclist permeability and legibility, both within and around the Site, and from the surrounding area.</p> <p>A large new publicly accessible green link is proposed providing a direct landscaped route from Mortlake Green to the river and new public plaza space.</p>	<p>Yes</p>

**Table 6: Scheme Acceptability in Principle**

9.14 In summary, the principle of the proposals is supported by national planning policies and guidance, at the strategic London-wide level, and in local policies, objectives and guidance. The proposals would deliver the vision for the Site (as identified in the adopted SBPB) and the regeneration of Mortlake, through substantial housing

delivery and sustainable mixed-use development.

*c) Is the loss of the existing (former) use acceptable in land use principle terms?*

- 9.15 The Stag Brewery Site was sold by AB InBev in December 2015 as it was surplus to the company's requirements and brewing operations were winding down. The Site was purchased by Reselton Properties Limited. In 2017, a major programme of decommissioning works was undertaken on Site, and this was carried out until October 2017.
- 9.16 With respect to industrial uses, Policy 4.4 of the London Plan seeks to retain a sufficient stock of land and premises for future industrial needs. Where surplus land is identified for release, this should contribute to meeting strategic and local planning objectives, including providing more housing, social infrastructure and town centre renewal.
- 9.17 Industrial land across the Borough will be retained (Policies DM EM 2 and LP 42) unless it can be demonstrated that there is no demand for an alternative industrial use. Where sites are released for alternative uses, they should be considered in the first instance for the development of office or other alternative uses and then for mixed use schemes, including housing (including affordable) and other employment generating or community uses. Proposals for mixed use schemes must maintain or improve the amount of employment floorspace on site.
- 9.18 In the case of the Stag Brewery Site, both the SBPB and emerging Site Allocation (Policy SA 24) confirm that a mixed use scheme is acceptable and there is no requirement to re-provide an industrial use. Consequently, it has been accepted in planning policy terms to redevelop the Site for non-industrial uses.
- 9.19 Specifically, the SBPB acknowledges at paragraph 5.5 that the continued use of the Site for the brewery occupier is not viable in the long term and paragraph 5.10 sets out that *"large scale Class B2/B8 uses would not be appropriate on the site as demand is low locally and these would not maximise the opportunity for integration with the surrounding area and create a vibrant mix of uses reflecting the site's location"*. Generally, industrial uses are not considered suitable for inclusion in

residential-led mixed use schemes.

- 9.20 The masterplan proposals would deliver significant employment opportunities, far exceeding those provided when the site was operated as a brewery. These, and other related benefits are discussed in detail in section 10 of this Town Planning Statement and within the submitted Employment Assessment, prepared by Regeneris Consulting and chapter 7 of the ES (socio-economics), also prepared by Regeneris Consulting.
- 9.21 With regard to the loss of the existing playing pitches, their loss is fully explained and justified within the context of the proposed masterplan and improved sporting facilities to be provided. Further details on this are included within the submitted OSPPA, prepared by Gerald Eve LLP.
- 9.22 **There are no physical or environmental reasons that would prevent the Site being redeveloped. The principle of the proposals is supported by national planning policies and guidance, at the strategic London-wide level, and in local policies, objectives and guidance. The proposals would deliver the vision for the Site (as identified in the adopted SBPB) and the regeneration of Mortlake, through substantial housing delivery and sustainable mixed-use development. The loss of the former industrial brewery use has been accepted and there is no policy requirement for the re-provision of industrial uses. The loss of the existing playing fields has been justified in the context of the masterplan and the wider sporting benefits to be delivered.**



## 10 Planning Considerations – Proposed Land Uses

10.1 This section assesses the proposed land uses and their acceptability in principle in planning policy terms. It concludes that the proposed mix of uses is acceptable in land use terms and that the uses are of an appropriate scale and balance in line with relevant planning policies. Furthermore, the mix of uses will deliver a new recreational and living quarter for Mortlake, in line with aspirations of the SBPB and the emerging Site Allocation.

10.2 This section considers the following land uses:

- a) Proposed residential uses
  - i. Housing
  - ii. Affordable housing
- b) Assisted living accommodation
- c) Care home
- d) Town centre uses
  - i. Retail
  - ii. Offices
  - iii. Leisure
  - iv. Hotel/pub with accommodation
- e) Social and community uses
  - i. School
  - ii. Other community uses

### a) Proposed Residential Uses

#### *Housing*

10.3 The scheme would provide up to 667 residential units (or 817 if blocks 13, 16 and 17 come forward as residential accommodation rather than assisted living units). 443 of these would come forward on the eastern portion of the Site and in full detail, with up to 224 being delivered on the western portion of the Site (submitted in outline), or up to 374 if blocks 13, 16 and 17 come forward as residential.

10.4 The NPPF's objective is to deliver a wide choice of high quality homes, to provide

opportunities for home ownership and to create sustainable, inclusive and mixed communities (paragraph 50). In order to boost housing supply, applications for housing should be considered against the presumption in favour of sustainable development (paragraph 49).

- 10.5 Increasing housing supply is one of the Mayor’s key strategic objectives which is supported by London Plan Policy 3.3 and table 3.1 which sets out minimum annual housing targets for each Local Planning Authority (‘LPA’) to meet the total annual target for London of 42,389 homes. LBRuT’s minimal target is 315 new homes per annum. Development sites should optimise the delivery of housing (Policy 3.3), whilst giving due considerations to other factors affecting development density (Policy 3.4). Large residential developments (500 dwellings+) should seek to create neighbourhoods with a distinctive character and sense of place (Policy 3.7).
- 10.6 LBRuT Core Strategy Policy CP 14 and emerging Local Plan Policy LP 34 state that the Council would seek to exceed the minimum London Plan housing target. It is anticipated that East Sheen, Mortlake and Barnes Common and Barnes could deliver 400-500 units over the Plan period (2018 to 2033). The supporting text to Policy LP 34 states that proposals should optimise the potential of sites and recognises that there is potential for housing development on existing employment land where the level of employment floorspace is retained or enhanced.
- 10.7 Providing a living community (including housing) is a key aspect of the vision for the former Stag Brewery Site, and the SBPB recognises that the scheme can provide a significant contribution to housing provision. Paragraph 5.22 of the SBPB notes that LBRuT will support a *“mixed tenure residential led mixed use development provided there is a range of other uses to create a vibrant Riverside area and associated employment and leisure opportunities”*. The emerging Site Allocation also echoes this and notes that the provision of residential uses will ensure that the new Mortlake village heart becomes a vibrant centre for new communities.
- 10.8 The masterplan would deliver a significant amount of new housing across the Site, in line with policy aspirations. Those residential units on the eastern side of the Site would generally be delivered on top of commercial ground floor uses, in order to help create an active and lively community on this portion of the Site. The west of the Site is more residential in nature, and the residential would be provided in blocks

18 and 19, with up to 24 townhouses also provided along the north western edge of the Site (blocks 20 and 21). Blocks 13, 16 and 17 may come forward as either assisted living accommodation for older people, or more traditional residential accommodation.

- 10.9 **The provision of a significant amount of housing on this under-utilised brownfield site would assist LBRuT and the Mayor in meeting local and strategic housing need, as well as assisting in providing a ‘village heart’ for Mortlake in line with aspirations for the Stag Brewery Site as described within adopted SBPB and emerging policy. Therefore, the principle of housing development in this location is entirely appropriate and in accordance with planning policy.**

### ***Affordable Housing***

#### *Policy Position*

- 10.10 The NPPF advises that local authorities should set policies for meeting affordable housing requirements on site and policies should be flexible to take account of changing market conditions over time (paragraph 50). The national PPG includes provision for vacant building credit (‘VBC’) where existing vacant buildings are brought back into use or demolished to make way for new development. The credit, based on total existing vacant floorspace, reduces the total affordable housing requirement for that particular development.
- 10.11 The London Plan sets out an aspiration to *“maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London”* with the desired mix to be 60% social and affordable rent and 40% for intermediate rent or sale (Policy 3.11). Affordable housing should be provided in line with the definition set out in Policy 3.10 and schemes should provide *the “maximum reasonable”* amount of affordable housing (Policy 3.12). The Mayor’s ‘Homes for Londoners Affordable Housing and Viability SPG’ (2017) states that schemes providing 35%+ affordable housing could qualify for the ‘fast track’ route, where viability testing to deliver more affordable housing may not be required.
- 10.12 LBRuT’s affordable housing target is for 50% of all new housing to be affordable,

with a tenure mix of 80% social rent and 20% intermediate (Core Strategy Policy CP 15 and emerging Local Plan Policy LP 36). The Council will seek the maximum reasonable amount of affordable housing on private residential and mixed use schemes, having regard to individual site circumstances (DMP Policy DM HO 6 and emerging Local Plan Policy LP 36). Draft Policy LP 36 states that, on sites capable of 10 or more units, at least 50% on-site provision will be sought and, where possible, a greater proportion than 50% should be achieved.

- 10.13 Paragraph 5.22 of the SBPB recognises that the amount of affordable housing on Site may be affected by the provision of a mix of uses, open space, community uses and restoration of historic buildings. Therefore, the amount of affordable housing that can be provided will be assessed on a case by case basis and subject to a detailed viability appraisal.

*Vacant Building Credit*

- 10.14 Vacant Building Credit is a relevant consideration to take into account. The PPG (Planning Obligations section) is clear that it should apply when a vacant building is brought back into use or is to be demolished to be replaced by a new building. It should only not apply in certain circumstances:

- Where buildings have been abandoned;
- Where buildings have been made vacant solely for the purposes of redevelopment; or
- Where buildings are covered by extant or recently expired planning permissions for similar development.

- 10.15 None of the above circumstances apply to the Stag Brewery redevelopment proposals. The buildings have not been abandoned (they were still being used in October 2017), there are no extant or expired planning permissions, nor were the buildings deliberately made vacant for the purposes of redevelopment. In respect of this latter point, the position with regards to the closure of the brewery is clear. The former owner and occupier AB InBev took a business decision in 2009/2010 to close operations at the site and move their operations elsewhere. As a consequence of and response to that business decision, AB InBev and LBRuT worked together to develop ideas, concepts and visions for the Site's redevelopment which culminated

in the preparation and adoption of the 2011 SBPB. There can be no doubt, therefore, that the Site was vacated solely for the purpose of redevelopment.

10.16 Paragraph 9.3.2 of the emerging LBRuT Local Plan refers to VBC and states:

*“In London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development, therefore the Vacant Building Credit will not apply. The mechanism for assessing the contributions from individual sites is set out in the Affordable Housing SPD, for each proposal to make an adequate contribution towards affordable housing which is directly, fairly and reasonably related in scale and kind to the development proposed.”*

10.17 As stated previously, it is clear that the Stag Brewery Site was not vacated solely for the purposes of development and, as none of the other PPG ‘exception’ tests apply, it is appropriate to apply VBC. Using the example calculation at PPG, Planning Obligations, paragraph 022:

- Existing floorspace on Site to be demolished or re-used amounts to 35,402 sqm;
- Total new residential floorspace proposed is 75,120sqm;
- Applying VBC deduction leaves residual residential floorspace of 39,718sqm against which affordable housing policies apply;
- LBRuT’s normal affordable housing requirement of 50% reduces to 26% based on the above.

#### *Viability Position*

10.18 In light of the planning policy position, during the early stages of scheme design and evolution, initial viability analysis was conducted to identify whether a 50% affordable housing scheme could be achieved, but this was discounted very early on as this level of affordable housing was clearly not viable. Equally, options involving 35% on-site provision were also investigated to identify whether it might be achievable to qualify for the GLA ‘fast-track’ viability route but, again, this level of on-site affordable housing was discounted at an early stage on viability grounds.

- 10.19 These planning applications are accompanied by a Financial Viability Appraisal ('FVA'), prepared by BNP Paribas. Section 5 of the FVA provides the results of the appraisal of the scheme the subject of these applications. A benchmark land value of £52.8m has been derived, following the preferred method of both the GLA and LBRuT: 'Existing Use Value plus'.
- 10.20 If no affordable housing was proposed (i.e. all 667 residential dwellings were for open market sale), the resultant residual land value would be significantly less than the Site's benchmark land value. Even if all existing buildings on Site are accepted as having been lawfully used over the past three years, the residual land value would still be significantly less than the benchmark land value.
- 10.21 The FVA has appraised the development with 20% on-site affordable housing (Block 18 – 132 dwellings), with LBRuT's preferred 80/20 tenure mix. As can be seen from Table 5.2.1 of the FVA, and as one would expect where a 100% private scheme is not viable, in a scenario where all existing floorspace on Site, and a significant proportion of offsite highways works are paid for by the ESFA / school delivery body, there would a significant deficit against the residual land value, equating to approximately £86m. If the tenure mix was changed to reflect a higher proportion of intermediate housing (70/30 in favour of intermediate), the viability position would improve slightly, as shown in Table 5.2.2, but there would still be a deficit against the residual land value of approximately £78m.
- 10.22 In order to assess what the development could potentially achieve (with favourable positions in respect of CIL floorspace, highway works funding and growth rates against sales values), the FVA contains further sensitivity analysis in respect of inflation and growth rates (Table 5.2.3). This includes provision for 6% growth in sales values each and every year over a 7 year period and a much lower inflation on costs (2.5%) over the same period. In this scenario, the following is assumed:
- a) 20% affordable (by unit) comprising 80/20 tenure split in favour of affordable rent;
  - b) All existing floorspace on site is accepted as having been in lawful use for six out of the prior thirty six months, reducing the overall CIL liability;
  - c) Blocks 13, 16 and 17 operate as assisted living use as opposed to residential use;

- d) All off-site highways works are funded by the school provider;
- e) Ambitious growth rates are applied to sales values; and
- f) The affordable housing is provided in the western part of the Site after the eastern part has been completed and sold (with a mechanism in place to ensure that the affordable housing on the western side is subsequently provided).

10.23 In the above scenario, a residual land value marginally higher than the benchmark land value is derived which would enable the development to come forward with 20% affordable housing on-site. In this scenario, which relies on significant and consistent annual growth in sales, there should be no requirement for any form of viability review after the grant of planning permission. The applicant is willing to offer a minimum of 20% affordable housing if the conditions above are met. The level would have to be revised and recalculated if the conditions are not met using a mechanism to be agreed as part of the planning agreement. The 20% is by unit (as a full habitable room schedule for the outline element of the scheme is not known at this stage), but it is likely to be a higher % figure by habitable room.

10.24 It is also important to note the relevance of the flexible assisted living / residential use (up to 150 units) to the viability position as per c) above. In the event that Blocks 13, 16 and 17 were restricted to residential use only (as opposed to flexible assisted living / residential), a significant additional CIL requirement would be generated from this element of the development which would result in the residual land value falling beneath the benchmark land value. A lower amount of on-site affordable housing would be necessary in order to reach a viable position.

*Delivery and timing*

10.25 Timing of delivery of affordable housing is another key factor, in addition to those set out at paragraph 10.22 earlier, which affects potential overall quantum.

10.26 As stated above, and in the FVA, block 18 has been identified as potential on-site affordable housing. Block 18 is located on the western part of the Site and is applied for in outline under these applications. In order to maximise the provision of affordable housing, the eastern part of the Site, applied for in detail, does not include provision for any affordable housing.

- 10.27 If early delivery of affordable housing is insisted upon, then the overall quantum that the development could deliver would have to be reduced, given the viability position.
- 10.28 **The scheme would provide 20% on-site affordable housing (potentially higher on a habitable room basis). This should be compared to the 26% level that would apply if the national policy on Vacant Building Credit is applied, as it should be. In any event the proposal has been viability tested in accordance with the Development Plan policies. All policies accept that the level of affordable housing should reflect viability considerations. If the FVA is accepted then the proposal is in accordance with the development plan. The final quantum, mix, type and timing for delivery would be determined having regard to an agreement on scheme viability.**

**b) Assisted Living Accommodation**

- 10.29 The NPPF (paragraph 50) and the London Plan (Policy 3.8) recognise the need to provide suitable housing for older people, in a variety of types and formats including providing accessible independent living options, as well as more specialist accommodation.
- 10.30 Blocks 13, 16 and 17 are submitted in outline and are applied for up to 150 units to be either assisted living accommodation or residential. The details of the units would be secured via Reserved Matters submissions. This section considers the acceptability of the units should they come forward as assisted living accommodation – their acceptability as residential units has been assessed in the preceding sections of this chapter.
- 10.31 If the blocks were to come forward as assisted living accommodation, they would provide specialist accommodation for older people. Care would be provided for residents which would be regulated by the Care Quality Commission. If delivered as assisted living units, it is envisaged that some of the care services would be shared with the care home services.
- 10.32 The submitted Assisted Living Overview and Characteristics Report, prepared by Savills, provides further details on how the assisted living accommodation would operate. In summary, the units would provide residents with a home within which



they can benefit from 24 hour care and emergency support, if required. Generally, there would be an age limit for residents and residents could change and adapt the amount of care they receive to meet their needs. Assisted living units are self-contained and often purchased (rather than rented), so that residents retain a sense of independence and continue to own their own home. Large, purpose-designed communal facilities assist in providing an additional level of care (meals, fitness, treatment and medical rooms etc.) alongside opportunities for socialising with other residents.

10.33 The London Plan and the Mayor's Housing SPG state that the building regulation requirement for new homes to be wheelchair accessible / adaptable would assist in keeping older Londoners in their homes for longer. Whilst this is true and may assist with meeting some of the forecasted demand for older-people's accommodation, Savills' submitted report also notes that older people often move into assisted living units for a sense of community and, importantly, to seek a level of care that they is difficult to receive at home.

10.34 As set out within Savills' report, assisted living units have a range of societal benefits, which are set out as follows:

- a) Purpose-built, specialist accommodation for older people can provide care on a sliding scale to meet peoples' needs as they age, in an environment where residents can retain a sense of independence, can own their own home, and can be incorporated into a community.
- b) Providing these facilities helps in reducing the burden on the NHS through reducing 'bed blocking' and the number of NHS GP and hospital visits. The on-site care team would be able to assist residents with their care, and the accommodation provided would be adapted and suitable for a range of needs. Many older peoples' accommodation is not suitable for their needs, hence longer stays in hospitals.
- c) Many older people are currently under-utilising their homes as younger generations leave the family home. These people generally own their own home and have a level of independence, so purchasing an assisted living unit is attractive given the home ownership/independence. This then helps to 'free up' these homes for young families.

- 10.35 In particular, ‘freeing up’ the housing stock through the provision of specially designed accommodation for older people would better utilise existing housing stock and help respond to demand for family housing. The provision of assisted living accommodation must be considered within this context, and not solely on the type of housing that is being delivered.
- 10.36 **Assisted living units are attractive to some older people, given that residents can own their own home and retain a level of independence whilst receiving on-site care. Developing purpose built assisted living units has wider benefits to society including reducing burdens on national healthcare systems, as well as freeing up housing stock for younger families.**
- 10.37 Annex 5 of the London Plan sets out an indicative benchmark of 2,620 specialist housing units for older people between 2015-2025. As set out within the Mayor’s Housing SPG, the majority of need for older people’s accommodation is within the private sector. In LBRuT, the London Plan indicative benchmark is 135 units per annum (105 private sale units / year). Paragraph 3.7.13 of the Housing SPG recognises that these benchmarks should not necessarily form the basis of LPA’s housing targets but this does provide some indication of the extent of need within LBRuT currently.
- 10.38 LBRuT adopted DMP Policy DM HO 5 and emerging Local Plan Policy LP 37 both generally support the provision of accommodation for older people where housing is provided for an identified local need, across a range of tenures and provided the accommodation is in a suitable location. However, LBRuT’s emerging Local Plan (paragraph 9.4.10) sets out that the need for affordable housing is substantial and is therefore a higher priority than accommodation for older people. DMP paragraph 5.1.35 states that where there is no need for alternative accommodation, *“the capacity for conventional housing should not be compromised”*.
- 10.39 The evidence base supporting the emerging Local Plan identifies limited need for extra care accommodation within the Borough, as set out within part (a) below. The submitted Assisted Living Demand Assessment, prepared by Regeneris, reviews the evidence base documents, along with a range of other demographic tools. Regeneris conclude that LBRuT’s estimates for older people’s accommodation do not reflect current need or future demand. The following conclusions are reached in

the report:

- a) Demand for future assisted living accommodation may have been underestimated by LBRuT's evidence, which states that there is demand for between 81 and 145 assisted living units to be delivered by 2020.
- b) Conversely, Regeneris estimate that there is actual demand for 303 assisted living units by 202 and up to 495 by 2033. Regeneris note that this is likely to be a conservative estimate, given that it does not account for those between 65-74 years who may require care.
- c) There are no extra care schemes or registered care bed spaces within the ward of Mortlake and Barnes Common (where the Site is located), or within close proximity. Those that are within 5km are all in Boroughs north of the River and supply of available spaces is limited. There is therefore limited choice for older people in the local area who require assisted living accommodation but who also wish to remain close to their families and support networks.

**10.40 The masterplan would deliver a significant amount of assisted living accommodation, which would help to meet demonstrated demand both within the local area, and within the wider Borough. The Mayor's Housing SPG identifies a specific shortfall of private older people's accommodation across London. Therefore, the provision of this accommodation is in line with DMP Policy DM HO5 and emerging Local Plan LP 37 which support the provision of housing for older people where it meets an identified local need.**

10.41 The Mayor's Housing SPG (paragraph 3.7.14) and LBRuT policies also require any accommodation for older people to be in a suitable location. The accommodation would be easily accessed by private car, as well as public transport and further details of accessibility are included within section 15 of this Town Planning Statement. The location of the assisted living accommodation on the wider masterplan is also of consideration. The new High Street uses, riverside walk and open spaces would provide spaces for the older residents to shop, socialise and enjoy. As noted in Savills' report, older residents like to feel part of a community, and integrating the new assisted living accommodation into the wider masterplan

would assist with this.

**10.42 The assisted living accommodation would meet identified local demand in a location which is suitable and accessible. This is in line with NPPF aspirations, the London Plan and Mayor’s Housing SPG as well as LBRuT’s planning policies. Therefore, the principle of this use is acceptable.**

**c) Care Home**

10.43 Blocks 14 and 15 within Development Area 2 would provide a nursing and care home (Class C2) with up to 80 en-suite rooms, with associated communal and staff facilities. These blocks are submitted in outline, with further details of the block layout and design to be agreed with LBRuT via future Reserved Matters submissions. The submitted Assisted Living Overview and Characteristics Report sets out that within the care home, a range of nursing and health care and treatment could be offered and each resident would have their own personal care plan. The care home residents would rent bedrooms.

**10.44 The masterplan would provide a dedicated nursing and care home with up to 80 en-suite bedrooms, with details to be secured via future Reserved Matters submissions.**

**d) Town Centre Uses**

10.45 Town centre uses, as set out in the NPPF, include amongst others retail development, leisure, entertainment, sport and recreation uses (including cinemas, restaurants, pubs and health and fitness centres), offices, arts, culture and tourism development (including museums and hotels). The masterplan proposes introduction of the following town centre uses on the eastern side of the Site:

- a) 4,664 sqm (GIA) ‘Flexible use’ floorspace to allow for a mix of shops, restaurants, cafés, pubs and bars, offices, leisure and community spaces along the new High Street and the new riverside walk, as well as through the connecting new routes;
- b) 2,424 sqm (GIA) office floorspace (block 5);
- c) A new cinema, located on the corner of Lower Richmond Road and Sheen

Lane (block 1);

- d) A new gym located within the Former Hotel Building (block 5); and
- e) A new hotel/pub with accommodation (up to 16 beds) within the Former Hotel Building (block 5).

10.46 The acceptability of these town centre uses in land use terms is assessed within this section of the Town Planning Statement.

10.47 The NPPF stipulates that LPAs should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality (paragraph 23). Where town centre uses are proposed outside of town centres, a sequential test may apply (paragraph 24) or an impact assessment (paragraph 26). These tests will not apply where town centre development is in accordance with an up-to-date Local Plan.

10.48 The London Plan has a strong ‘town centre first’ policy (Policy 2.15) and accordingly directs retail, commercial, culture and leisure development to town centres in the first instance. The Plan recognises that town centres will not accommodate all town centre development and Policy 4.7 states that where no in-centre sites are available, retail, commercial, culture and leisure development should be directed to edge of centre sites that can be well integrated with existing centres and public transport. Proposals for new, or extensions to, edge or out of centre development will be subject to an impact assessment. The Mayor’s Town Centres SPG (2014) provides guidance on the implementation of the London Plan town centre policies.

10.49 At a local level, the Site is within the Mortlake Area of Mixed Use (‘AMU’) but not within a designated town centre. As set out within paragraph 4.2.14 of the DMP, AMUs “*delineate the areas surrounding the smaller centres of the borough that contain a mix of uses, and are seen as being able to maintain or expand this aspect of their character*”. It is clear, therefore, that AMUs are regarded as appropriate for town centre uses which are suitable in the smaller retail centres of the Borough.

10.50 DMP Policy DM TC 2 sets out the scope of commercial uses that would be acceptable in local and neighbourhood centres and AMUs. A mix of uses that primarily meet local needs would be acceptable, subject to their impact on

surrounding centres, parking and heritage and local character.

- 10.51 Emerging Local Plan Policy LP 25 sets out the Borough’s emerging policy on development within centres as defined in the centre hierarchy. The Mortlake AMU is not within a designated centre but paragraph 7.1.17 of the emerging Local Plan notes that Parts A and C of Policy LP 25 still apply. Part C states that *“appropriate”* uses include *“new retail (including markets), business or employment developments, which maintain suitable provision for small businesses, and other uses, which primarily serve the needs of the local community or attract visitors and develop cultural opportunities”*. These uses are appropriate within AMUs. Town centre development outside of AMU boundaries may be required to satisfy the sequential test.
- 10.52 One of the key elements of the SBPB and the emerging Site Allocation is for the Stag Brewery Site to provide a *“new village heart and centre for Mortlake”* and in order to achieve this objective, a range of uses will need to be provided in addition to residential uses. The SBPB encourages a mix of uses to generate vibrancy, including *“restaurants, cafés, small retail spaces, community leisure uses, a museum, boat houses and other river-related uses/activities”*, along with business use floorspace. The emerging Site Allocation states that *“employment (B uses), commercial such as retail and other employment generating uses”* will be supported. Saved UDP Allocation S4 also encourages employment uses, stating that the redevelopment of the Stag Brewery Site should provide for the retention of existing employment levels and river related uses.
- 10.53 The Site is located within 160m to the north of the defined town centre boundary of East Sheen and therefore in policy terms is to be regarded as an ‘edge of centre’ location. A Retail and Leisure Statement has been prepared by RPS CgMs in support of Application A. The Statement sets out that as the Site has in principle support for retail and leisure given the adopted UDP allocation and emerging Site Allocation, a sequential or impact assessment for these uses is not required. Notwithstanding this, both have been prepared and RPS CgMS conclude that the proposed retail and leisure will have a positive beneficial effect on nearby retail centres and that the scale of retail and leisure proposes is in scale with the overall scheme and policy allocation.

10.54 **The Site is within an AMU, where town centre uses that serve primarily local needs will be considered acceptable. In addition, the Site is also subject to a Site Allocation which supports town centre uses, as does the SBPB. Therefore, the development of town centre uses as part of the wider masterplan is entirely appropriate in policy terms, and will contribute towards meeting the stated aims and objectives of the SBPB.**

***Retail***

10.55 The masterplan proposes flexible floorspace at the lower levels of a number of buildings within Development Area 1 that could include a mix of retail floorspace (Class A1 – A4). This flexible floorspace would consist of a maximum of 2,500 sqm Class A1 retail, 200 sqm Class A2 retail, 2,200 sqm Class A3 restaurants and 1,600 sqm Class A4 bars. There would also be a minimum provision of A1 retail within the new ‘High Street Zone’ (see plan ref. G100\_P1\_P\_TY\_001, as included at Appendix A). Section 4 of this Town Planning Statement provides further details on the proposed flexible use floorspace. The suggested parameters should ensure a good mix of retail uses across the Site to help deliver a vibrant recreational quarter.

10.56 Policy 4.8 states that the Mayor will, and Boroughs and other stakeholders should, support a successful, competitive and diverse retail sector.

10.57 At a local level, DMP Policy DM TC 2 (part (e)) states that retail which primarily meets local needs will be acceptable in AMUs, subject to other policy considerations. Part C of emerging Local Plan Policy LP 25, which applies to the Mortlake AMU, recognises that retail can be an appropriate use.

10.58 The emerging Site Allocation specifically states that appropriate uses on Site include retail.

10.59 The SBPB also recognises the role that retail/restaurant/café/bar uses can play in encouraging more activity on the Site. In line with local town centre policy, the SBPB states that any retail uses should be “*small scale*”, “*ancillary to the uses on site to serve local needs*” and that the area should “*not be considered as a retail destination in its own right*” (paragraph 5.14). The retail uses should not compete with nearby retail centres. Neither the emerging Site Allocation nor the SBPB

provide any guidance or floorspace limits (minimum or maximum) for retail.

- 10.60 **Retail (Class A1 – A4) is encouraged on Site as part of the wider masterplan, in order to develop a vibrant living quarter for Mortlake. The scheme proposes a range of flexible use with suggested caps to ensure a true mix of uses comes forward to achieve this aim.**
- 10.61 The submitted Retail and Leisure Statement, prepared by RPS CgMs, has considered the scale of retail proposed in the context of surrounding retail centres and the planning policy position. The Statement concludes that the retail proposed will only serve local needs which will be newly created by the wider masterplan, which has policy support. To put the retail floorspace into perspective, a total of 4,664 sqm (GIA) retail floorspace (Class A1 – A4) could be brought forward (maximum), compared with 34,900 sqm existing within East Sheen. This represents only 13.6% of East Sheen’s centre.
- 10.62 **The scale of retail is appropriate for the wider masterplan and will serve newly created local needs. The retail would complement, not compete with, nearby retail centres. This is in line with the role of AMUs, as set out within DMP Policy DM TC 2 and is therefore an acceptable scale.**
- 10.63 With regard to the health of the surrounding centres, the Retail and Leisure Statement clearly demonstrates that these are all relatively ‘healthy’ in retail planning terms, with only 6.8% of units in East Sheen (including Sheen Lane) being vacant. Due to the very low levels of vacancy, RPS CgMs conclude that even if the sequential test were to apply in this instance, there would be no capacity for the proposed retail to be accommodated in existing centres.
- 10.64 In terms of impact, RPS CgMs consider the impact of the proposed retail and leisure offer upon East Sheen District Centre, Barnes Local Centre, Kew Gardens Station Local Centre and White Hart Lane Neighbourhood Centre. It is concluded that the centres’ health and the proposed quantum and type of retail and leisure proposed at the Site would not have an adverse effect on existing retail centres.
- 10.65 **Retail sequential and impact tests have been undertaken by RPS CgMs who conclude that the proposed retail uses would have a positive and beneficial**



**effect on local centres and would complement existing provision found within the local area, rather than compete.**

### **Offices**

- 10.66 The development proposals include the provision of 2,424 sqm dedicated office (Class B1) floorspace, which is located in block 5 on the eastern portion of the Site (within Development Area 1). The proposals also include the development of a small site management office within the ground floor of block 12. The office accommodation has been designed to be flexible and adaptable in order to suit a wide range of occupiers and modern business needs.
- 10.67 In addition to the above dedicated office space, office floorspace could come forward as part of the flexible space proposed on the lower floors of a number of buildings within Development Area 1 (see paragraphs 4.9 – 4.14 of this Town Planning Statement). The suggested floorspace cap would enable up to 2,000 sqm of the flexible floorspace to come forward as offices. Consequently, the development could provide up to 4,424 sqm dedicated office space.
- 10.68 London Plan Policy 4.2 sets out that the Mayor will *“support the management and mixed use development and redevelopment of office provision to improve London’s competitiveness”*. New development should be focused in viable locations including on mixed use schemes with good public transport accessibility.
- 10.69 Local policy also directs new office space to suitable locations, taking into account local need, design and amenity impacts and transport considerations (DMP Policy DM EM 1 and emerging Local Plan Policy LP 41). The Site is identified as an appropriate location for offices.
- 10.70 Specifically in relation to the Stag Brewery, the SBPB at paragraph 5.11 states that the Council would *“support office development as part of a mix of employment uses”* and that the *“scale should be limited and the Council will encourage the provision of smaller units where these meet modern business needs”*. The emerging Site Allocation (Policy SA 24) recognises the Site’s location within the Mortlake AMU and sets out the expectation that the Site will deliver *“a substantial mix of employment uses (B uses)”* and that other uses generating employment will also be supported.

Both the SBPB and the emerging Site Allocation provide particular support for employment uses such as creative, scientific and environmental industries. Start-up units and lower cost units suitable for smaller businesses are also encouraged.

10.71 As set out within the submitted Employment Assessment, the Council's own employment study also recognises that the former Stag Brewery Site could assist with delivering office stock in the Borough (Sites and Premises Study (2017 update)). The Study concludes that redevelopment within existing defined Key Office Areas in the Borough is unlikely to be sufficient to meet additional office floorspace demand. Therefore, consideration should be given to accommodating office floorspace elsewhere within the Borough or in the Functional Economic Market Area. The former Stag Brewery Site is identified as one of two sites within the Borough with potential to provide a substantial amount of net additional employment floorspace (albeit with poorer accessibility than the other site at Richmond).

10.72 As set out in emerging Local Plan Policy LP 41, major developments with over 1,000sqm office floorspace would be expected to provide at least 10% of this as affordable workspace. The scheme proposes that 10% of the office accommodation would be affordable workspace. This measure would be secured via a legal agreement. It is expected that a similar measure would be put in place for a scenario whereby the flexible floorspace includes relevant office accommodation.

10.73 **The scheme would deliver a significant amount of office floorspace in response to local demand, including a policy compliant amount of affordable workspace. The office accommodation would contribute significantly to delivering jobs and employment opportunities at the Site, together with other employment-generating uses. This is in line with the aspirations of the London Plan, the SBPB and the emerging Site Allocation.**

### ***Leisure Uses***

10.74 The masterplan proposes a new cinema in block 1 and a gym in block 5, both of which are classed as town centre uses. Both of these uses would help to deliver employment on the Site, as demonstrated in the submitted Employment Assessment and Socio-Economics chapter of the ES, both prepared by Regeneris

Consulting.

- 10.75 London Plan Policy 4.6 sets out that the Mayor will support arts, cultural, sporting and entertainment uses and the cultural, social and economic benefits that they deliver. These use should be directed these to easily accessed sites which are accessible to all.
- 10.76 With regard to evening economy uses, DMP Policy DM TC 5 lends support for uses including cinemas, leisure, restaurants, pubs and bars so long as they are compatible with other town centre policies and there is not an adverse effect on the amenity of nearby uses. As previously explained within this section, the Site is considered appropriate for the development of town centre uses, which include local level cultural uses.
- 10.77 The submitted Retail and Leisure Statement, prepared by RPS CgMs, also considers the impact of the proposed leisure uses on nearby retail centres, and their appropriateness in terms of scale. As with the retail uses, the Statement points to the fact that the Site is a preferred location for the development of leisure uses, and that the emerging Site Allocation and SBPB encourage the provision of these uses.
- 10.78 The Retail and Leisure Statement sets out a standalone Cinema Assessment and reviews the proposed cinema provision at the Stag Brewery Site against existing cinema offers in the local area. The size and type of cinemas are assessed and it is noted that there is in fact local demand for at least two additional cinema screens within the local area. This has little regard to the fact that London has the highest expenditure on cinema visitation of any UK region. It is concluded that the provision of a cinema as part of the masterplan will *“not have a significant adverse effect upon existing local cinemas or indeed town centres”*.
- 10.79 **The proposed cinema would have a positive and beneficial impact in the area, addressing an unmet demand. The cinema, along with other leisure uses has been assessed by RPS CgMs and found to have a positive and beneficial effect on local centres. Both uses would also help to deliver local employment.**

***Hotel / Pub with Accommodation***

- 10.80 It is proposed to provide a small ‘pub with rooms’/hotel within part of the Former Hotel Building (block 5) in the south eastern portion of the Site to provide up to 16 hotel rooms. This would bring the Former Hotel Building back into its original use.
- 10.81 London Plan Policy 4.5 states that the Mayor will “*support London’s visitor economy*” partly through the provision of 40,000 net additional hotel bedrooms by 2036, of which at least 10% should be wheelchair accessible. In terms of location for new hotels, the Policy directs development to appropriate areas i.e. within the Central Activities Zone (‘CAZ’), in town centres and opportunity and intensification areas, where there is good public transport access to central London and international and national transport termini. In some circumstances hotels will be encouraged outside of these locations, where they are related to major visitor attractions of sub-regional or greater significance.
- 10.82 At a local level, LBRuT Core Strategy Policy CP 20 directs hotels to the Borough’s town centres and other areas highly accessible by public transport. The Stag Brewery Site is within the Mortlake AMU, which is not within the town centre hierarchy and emerging Local Plan Policy 25 (Part C) notes that appropriate uses could include those which “*attract visitors and develop cultural opportunities*”. A hotel would fit with this definition.
- 10.83 Emerging Policy LP 43 encourages an increase in hotel bedspaces, subject to other Local Plan considerations (including location in accordance with emerging Policy LP 25). A range of visitor accommodation will be encouraged and local policy also seeks for new accommodation to be accessible for all. Both Core Strategy Policy CP 20 and emerging Local Plan Policy 43 stress the importance of proposals for visitor accommodation being considered in respect of impact on amenity, living conditions, parking, servicing and transport.
- 10.84 A Hotel Needs Assessment has been prepared by Gerald Eve LLP and accompanies the submission. The Assessment sets out that there is market demand for the provision of a small hotel in this location given the good transport links, office development along the Western Corridor, and connections to nearby major attractions including Kew Gardens, Hampton Court Palace, Ham House and

Twickenham Stadium, as well as nearby to Heathrow Airport. Demand would also be generated for the hotel from the masterplan proposals.

10.85 The emerging Local Plan notes that the 2012 Hotel Study identified a need for the delivery of 900 hotel bedrooms in the LBRuT by 2026. Between April 2009 and April 2012, 113 hotel bedrooms were delivered across the Borough (as noted in the 2012-2013 Annual Monitoring Report). If this rate of delivery is applied from 2012 to present day (to the end of 2017) then a maximum of 188 bedrooms out of the 900 required may have been delivered. Therefore, it is considered that a demand for the delivery of at least 712 hotel bedrooms in the Borough remains. The Hotel Needs Assessment builds on this and notes that the current pub accommodation stock in the Borough is relatively limited and dated.

10.86 In addition to responding to local demand and meeting market needs, the Hotel Needs Assessment sets out that the development of a pub with rooms hotel in this location would have further economic benefits for the local area including through creating jobs and directing visitor spending in the local area. The submitted Employment Assessment and Socio-Economics chapter of the ES, both prepared by Regeneris Consulting, set out these benefits arising from the hotel use, amongst the other uses proposed.

10.87 **A small pub with rooms is proposed which would provide 16 beds. There is clear demand for hotels within the Borough and the Site is a suitable location for a small hotel given the Site Allocation and AMU designation. The hotel offering would respond to identified need and would deliver wider economic benefits for the local area, as set out within the Hotel Needs Assessment, prepared by Gerald Eve LLP and the Employment Assessment and Socio-Economics chapter of the ES, prepared by Regeneris Consulting.**

**e) Social and Community Uses**

10.88 The NPPF advocates for development to create “*strong, vibrant and healthy communities*” which provide high quality environments with adequate housing supply and accessible local services that reflect community need (paragraphs 7 and 12).

- 10.89 The London Plan also places a strong emphasis on delivering additional and enhanced social infrastructure to meet the needs of London, with Policy 3.16 supporting proposals which provide high quality social infrastructure in light of strategic and local need. Supporting paragraph 3.86 sets out that social infrastructure includes health, educational, community, cultural, play and sport, spiritual and community safety facilities. The Policy recognises that social infrastructure delivered alongside housing developments can help to make *“residential areas more attractive”* and create *“sustainable neighbourhoods and communities”*, in line with London Plan Policy 7.1. Where new social and community uses are provided, these should be accessible for all and in locations that are easily accessed by public transport. Where possible, the extension of new social uses to serve the wider community will be encouraged.
- 10.90 Local policy also sets out that new social and community infrastructure will be supported (Core Strategy Policy CP16) with detailed policies going on to state that this support will be where it responds to local need, is of a high quality design and accessible for all, is in a sustainable location and considers impact on transport and local character and amenity (Policy DM SI 1 and emerging Local Plan Policy LP 28). In line with the London Plan, the provision of services which can be extended to other areas of the community, through the provision of multi-use, flexible and adaptable buildings or co-located services will be encouraged.
- 10.91 Both the SBPB and the emerging Site Allocation identify that the redevelopment of the Site should provide a mix of vibrant uses, which includes social infrastructure and community uses, including leisure and sport and health uses.
- 10.92 **The scheme would deliver a range of social and community uses, including a school, community spaces and open green space. These facilities are being provided in response to local needs and are therefore supported at all policy levels.**

### ***School***

- 10.93 The masterplan would deliver a new six form entry secondary school with sixth form on the eastern side of the Site. A detailed application (Application B) has been submitted for the erection of the school and associated play facilities and

infrastructure.

- 10.94 Specifically in relation to schools, the NPPF sets out at paragraph 72 that LPAs should take a *“proactive, positive and collaborative approach”* to meeting the need for school places and to development that will assist in widening the choice in education.
- 10.95 London Plan Policy 3.18 demonstrates the Mayor’s strong support for the establishment of new schools, including secondary schools. Proposals for new schools *“should be given positive consideration”* and should only be refused where negative local impacts can be demonstrated and substantially outweigh the proposals. With respect of mixed use schemes, the Policy states that schemes that *“co-locate schools with housing should be encouraged”*. Encouraging the wider use of school facilities will be supported and paragraph 3.104 states that *“School facilities such as sports, training and meeting facilities should be capable of use by the wider community outside school hours”*. With regard to sporting facilities, London Plan Policy 3.19 states that proposals which increase or enhance the provision of sports and recreation facilities will be supported.
- 10.96 At a local level, emerging Local Plan Policy LP 29 supports the development of new secondary schools where these meet local need, with paragraph 8.2.3 setting out that *“priority will be given”* for these education facilities. Again, the Policy encourages the multi-use of schools by local community groups and the Council will seek to ensure this extended use through appropriate measures, including Community Use Agreements.
- 10.97 Specifically in relation to the Stag Brewery Site, the SBPB identified a need for the Site to deliver a two-form entry primary school (paragraph 5.20). On 15 October 2015, a report was presented to LBRuT’s Cabinet which sought approval from Members to change the education requirement at the Site from a primary school to a secondary school. The report was accompanied by an update to the School Place Planning Strategy, which identified the new requirement for a six form entry secondary school, plus sixth form, at the Stag Brewery Site. This requirement has translated into the emerging Local Plan Site Allocation (Policy SA 24) which sets out the Council’s aspiration for the school at the Stag Brewery Site.

- 10.98 **In line with the emerging Site Allocation, the scheme would deliver a new six form entry secondary school which includes a new sixth form for 1,200 students. Delivering a new school which meets local need is strongly supported by the NPPF, the London Plan (Policy 3.18) and LBRuT's emerging Local Plan (Policy LP 29 and Site Allocation Policy SA 24).**
- 10.99 The Applicant's architects (Squire & Partners) have designed the school and the land for the school and play facilities would be transferred to LBRuT. LBRuT would co-ordinate occupation of the school to best meet local demand – it is likely that this would be in conjunction with the ESFA.
- 10.100 The school would provide play facilities at roof level, an indoor sports hall, a MUGA as well as a full sized artificial all weather playing pitch with spectator facilities. Floodlighting for the proposed playing pitch would be provided. Further details on the proposed play facilities can be found within the submitted Open Space and Playing Pitches Assessment, prepared by Gerald Eve LLP and enclosed appendices.
- 10.101 **In line with aspirations of the London Plan (Policy 3.18) and LBRuT (Policies CP16 and DM SI 1 and emerging Policies LP 28 and LP 29), the external play pitch, indoor sports hall and MUGA would be available for community use out of school hours. The Applicant and the ESFA have committed to a Community Use Agreement which would enable local groups, teams, clubs, organisations and bodies the opportunity to use these facilities.**

### ***Other Community Uses***

- 10.102 As part of the overall flexible use area, the ground and first (part only) floors of the Maltings building (block 4) and ground floor of block 9 (boathouse, sui generis use) are anticipated to come forward for D1 community use as part of the flexible mix. Both blocks are on the eastern side of the Site and are applied for in the detailed part of Application A. At this stage, operators have not yet been identified but it is anticipated that block 9 would accommodate a boat house facility for a local rowing club and that the Maltings would provide flexible space for local community groups to hold events and use by agreement.



10.103 As set out above, there is clear policy support for the provision of appropriate social and community uses in this location. In allocating spaces within the development for such uses, the scheme complies with the SBPB and the emerging Site Allocation, both of which encourage the development of community and river-related uses.

**10.104 The scheme would provide flexible community uses, in line with policy aspirations for the Site. These would be delivered as part of the overall 'flexible' uses on the eastern part of the Site. These uses would contribute to the mix of uses being delivered on Site and help to create a new village heart for the Mortlake community.**

## 11 Planning Considerations – Jobs and Employment

- 11.1 **The proposed development would deliver significant and widespread jobs and employment opportunities in a range of sectors and of different types. Currently, the Site provides extremely limited employment, whereas the proposed masterplan could deliver a significant number of jobs during construction and once the development is occupied. This would contribute to increasing Borough employment numbers and creating a new heart for Mortlake.**
- 11.2 National planning guidance places a strong emphasis on delivering and maintaining a strong and competitive economy through the planning process. Supporting economic goals is one of the three elements of ‘sustainable development’ as set out within the NPPF.
- 11.3 One of the London Plan’s 6 strategic objectives is to deliver “*an internationally competitive and successful city with a strong and diverse economy*”. This objective is supported by detailed policies which encourage economic growth, both in inner London (Policy 2.9) and London-wide (Policy 10.1).
- 11.4 At a local level, LBRuT’s Core Strategy, DMP and emerging Local Plan all seek to promote a strong and diverse local economy and boost employment opportunities within the Borough (Policies CP 19, DM EM 1 and LP 40).
- 11.5 It is a key aspiration of the SBPB and the emerging Site Allocation that the Stag Brewery site should deliver a mix of uses including a “*substantial mix of employment uses (B uses)*” as well as “*other employment generating uses*”. The proposed scheme is in line with these aspirations and would deliver a significant amount of commercial floorspace and other employment generating uses.
- 11.6 As set out within the submitted Employment Assessment and the Socio-Economics chapter of the ES, both prepared by Regeneris Consulting, the Site is currently providing limited employment for the Borough following the cessation of brewery operations on Site. The previous brewery use did employ a number of people, but there is no longer demand for this use on the Site, as recognised by the SBPB and

emerging Site Allocation.

11.7 The proposed scheme would provide improved and increased employment opportunities when compared against current and previous employment levels on Site, as demonstrated in the Employment Assessment and Socio-Economics Chapter. It is estimated that the proposed development will generate up to the following numbers of jobs and employment opportunities:

- a) An average of 1,110 construction related Full Time Equivalent ('FTE') jobs would be generated per annum over the eight-year build period.
- b) Approximately 350 to 500 net FTEs arising from the completed development.

11.8 The Employment Assessment concludes that the masterplan would deliver a wide range of employment related benefits due to the substantial increase in the provision of modern, useable employment floorspace on the Site. These benefits are summarised as follows:

- a) The employment spaces have been designed to be flexible and adaptable units which would suit a wide range of occupiers and modern business needs. This will help to create a stronger and more diverse business base, with the provision of modern, flexible floorplates as well as dedicated small business space.
- b) The range of long term local employment opportunities will be substantially broadened.
- c) The masterplan will redevelop a redundant employment site and respond to local employment challenges, as set out within planning policy.
- d) There will be the opportunity to support local residents during the construction phase through employment and providing training and work placement opportunities. There will also be the opportunity to engage with local businesses and suppliers during the construction phase to encourage growth and jobs.
- e) The increased expenditure generated from the gross additional employees will help to support local retail and service businesses.
- f) A significant number of additional FTE jobs will be created.

11.9 **The proposals would generate a significant level of employment both in terms of number, type and variety of jobs. This is far in excess of the former brewery**

**use and the current situation. The scheme complies fully with planning policies at all levels which seek to ensure that new development provides significant jobs and employment opportunities.**

## 12 Planning Considerations – Residential Design

12.1 This section assesses the proposed residential units in design terms and considers the following:

- a) Residential density
- b) Unit mix
- c) Housing quality / design standards:
  - i. Unit sizes and configuration
  - ii. Amenity space
  - iii. Playspace
  - iv. Accessibility
  - v. Aspect and privacy
  - vi. Shared circulation

12.2 This section does not consider the external building design of the residential spaces – these details are assessed within chapter 13 of this Town Planning Statement and further detail included within the submitted Design and Access Statement. This section should be read alongside the submitted Housing Assessment Matrix and Design and Access Statement, both prepared by Squire & Partners. The Housing Assessment Matrix fully assesses the scheme against the technical housing standards, as contained within the Mayor’s Housing SPG.

### a) **Residential Density**

12.3 The masterplan proposes up to a total of 667 residential units across the development (or 817 if the assisted living units come forward as residential). This comprises 443 in Development Area 1 (applied for in detail), and up to a maximum of 224 on Development Area 2 (applied for in outline), with up to 150 applied for as flexible assisted living or residential units.

12.4 There are various methods to calculate residential density. The simplest approach is to take the total site area and divide this by the total number of residential units to calculate a unit/ha figure and then calculate the habitable rooms per hectare in a similar manner.

12.5 This approach does not, however, take into consideration the fact that a significant proportion of the site area is not linked to residential development, and this therefore dilutes the density calculation. The Mayor's Housing SPG suggests that mixed use schemes could use the Maccreeanor Lavington approach to density, which seeks to discount non-residential associated spaces from the total site area, as well as apportion residential and non-residential space across the remaining site area. It is considered that this method offers a more 'true' approach to density calculations. This approach has been followed to calculate density for this scheme and the results are demonstrated in Tables 7 and 8 (see paragraph 12.3 of this Town Planning Statement).

*Density – Policy Position*

12.6 There are no site-specific policies setting development density levels within the London Plan, LBRuT planning policies, the SBPB or the emerging Site Allocation. London Plan Policy 3.4 states that development should optimise housing output for different types of location within the relevant density ranges shown in Table 3.2 (the 'density matrix'). The Mayor's Housing SPG (paragraph 1.3.1) states that 'optimisation' of housing can be defined as *"developing land to the fullest amount consistent with all relevant planning objectives"*. The London Plan and the Mayor's Housing SPG are very clear that it is not appropriate to apply the density matrix mechanistically to proposals, and various factors should be considered.

12.7 London Plan Policy 3.7 and the Mayor's Housing SPG recognise that large sites (over 5ha) have the *"potential to define their own characteristics and accommodate higher density development"*. Large sites have the potential to create distinctive neighbourhoods and generate the critical mass to support social, physical and green infrastructure.

12.8 The emerging Local Plan states that development *"should optimise housing provision for different types of location within the relevant density range taking into account the London Plan Density Matrix"*. This guidance will be considered along with local factors including accessibility and local character. Generally, local planning policy directs higher density to the town centres, although the emerging Local Plan does recognise that the Stag Brewery site could accommodate higher densities even though it is not within a designated town centre (paragraph 3.1.8). The Site is within a designated

AMU boundary, where there is recognition in local policy that some town centre uses will be appropriate, and therefore there are shared characteristics between town centres and AMUs. Policies LP1 and LP2 set out requirement for new development with regard to local context and building heights.

- 12.9 In summary, policies and guidance encourage and support higher density development in locations such as the application site, and the London Plan Density Matrix, whilst an important sense check tool, should not be applied mechanistically in the assessment of appropriate density.

*Residential Density – Achieving Planning Objectives*

- 12.10 The resulting residential density across the Stag Brewery Site is the by-product of two driving scheme aspirations, which are:

- a) To optimise housing delivery on Site, in line with national, regional and local policy aims to boost housing supply as well as to deliver the critical mass required to achieve the SBPB and emerging Site Allocation aims for the Site; and
- b) To develop a well-designed scheme which responds to the local townscape and context, and provides good quality homes with suitable amenity space and open spaces.

- 12.11 The proposed development responds to planning objectives as set out as below. In doing so, the resulting residential density of the scheme can be considered wholly appropriate:

- a) Townscape, design and local context – the proposed built form is appropriate for the local context. Further details can be found within section 13 of this Town Planning Statement and within the submitted Design and Access Statement.
- b) Amenity – the scheme has been designed with due consideration to impacts on amenity for existing surrounding and residents, as well as new residents. Further details can be found within section 18 of this Town Planning Statement, the Design and Access Statement and the ES.
- c) Open Space – the scheme would provide a significant amount of new open space, including extensive publicly accessible green space, plus hard

landscaped areas and children’s playspace, for use by the new residents as well as the wider local community. Further details can be found within section 14 of this Town Planning Statement, the submitted Landscape Design and Access Statement, prepared by Gillespies and the submitted OSPPA, prepared by Gerald Eve LLP.

- d) Transport – the scheme has been designed to encourage pedestrian and cycle movement wherever possible and improve routes to, from and across the site. An appropriate level of car parking would be provided and associated highways works are proposed so that the development would mitigate any impact on the local highway network. Further details can be found within section 15 of this Town Planning Statement and the submitted Transport Assessment, prepared by PBA.
- e) Social infrastructure – the scheme would deliver significant social infrastructure, which would benefit the new and existing communities. This would include the new secondary school with associated sports facilities (open to use by the public via a community use agreement), community use spaces as well as the new high street uses (convenience, leisure and employment opportunities) and open spaces which would foster community links. Further details can be found within sections 11 and 14 of this Town Planning Statement and the submitted Design and Access Statement, prepared by Squire & Partners, the Landscape Design and Access Statement, prepared by Gillespies and the OSPPA, prepared by Gerald Eve LLP.

12.12 As set out in paragraph 4.3 of this Town Planning Statement, the scheme has evolved to achieve the Council’s vision for the Stag Brewery site, as contained within the SBPB and the emerging Site Allocation. In order to provide a new village heart for Mortlake with a mix of uses and new green spaces and links through to the riverside, a certain critical mass of development is required. This mass has helped to inform the evolving scheme design.

#### *Density Calculation*

12.13 As set out in paragraph 12.5 above, the proposed residential density has been calculated using the Maccreeanor Lavington approach as set out within the Mayor’s Housing SPG. During pre-application discussions, the GLA suggested that the ‘net site area’ exclude the school, playing fields, community park and solely non-



residential uses, with non-residential space within mixed use buildings apportioned out and subtracted off the site area. This approach has been followed and the calculations for the development density are set out in Tables 7 and 8. Two scenarios have been calculated – one for blocks 13, 16 and 17 as assisted living accommodation (thereby not classed as ‘residential’ and excluded from density calculations, table 7) and one for these blocks as residential accommodation (and then included within the density calculations, table 8):

<b>Blocks 13, 16, 17 as assisted living (i.e. excluded in density calculations)</b>					
Number of Residential Units	667				
Average Habitable Rooms per Unit	3.36				
PTAL	2				
Setting	Urban				
Appropriate density range	200-450 hab rooms per hectare				
	55-145 units per hectare				
Site Area (ha)	Ha	Units Per Hectare	Within Density Range for Units?	Hab Rooms Per Hectare	Within Density Range for Hab Rooms?
<b>Net Site Area</b>	<b>5.59</b>	<b>119</b>	<b>Yes</b>	<b>401</b>	<b>Yes</b>

**Table 7: Density Matrix Calculations - Assisted Living Excluded**

<b>Blocks 13, 16, 17 as residential (i.e. excluded in density calculations)</b>					
Number of Residential Units	817				
Average Habitable Rooms per Unit	3.31				
PTAL	2				
Setting	Urban				
Appropriate density range	200-450 hab rooms per hectare				
	55-145 units per hectare				
Site Area (ha)	Ha	Units Per Hectare	Within Density Range for Units?	Hab Rooms Per Hectare	Within Density Range for Hab Rooms?
<b>Net Site Area</b>	<b>5.88</b>	<b>139</b>	<b>Yes</b>	<b>459</b>	<b>No</b>

**Table 8: Density Matrix Calculations - Assisted Living Included**

12.14 The Mayor's Density Matrix provides guidance on acceptable density levels (units and habitable rooms per hectare) and different thresholds levels are set depending on the local setting, the accessibility of the area and the average habitable rooms per unit in the scheme. In this instance, the appropriate density range for the Site is 55-145 units/ha and 200-450 hab rooms/ha. The Site has a PTAL of 2 (note reference to PTAL as set out in paragraph 5.17 of this Town Planning Statement) and is within an 'Urban' setting. This setting has been determined on the basis that the local area has dense development (including terraced housing and mansion block style buildings and blocks of flats) on mixed building footprint sizes (small, medium and some large) with a mix of uses, including residential, commercial, education, sports and leisure. East Sheen District Centre is approximately 170m away at the closest point and the Site is located on a main arterial route. This approach has been agreed by the GLA.

12.15 Tables 7 and 8 demonstrate that the proposed residential development is in accordance with the number of units per hectare and only very slightly above the habitable room per hectare density range where blocks 13, 16, 17 come forward as assisted living accommodation. However, as set out above, the density matrix should not be applied mechanistically and in this instance the proposed density is acceptable

for the Site and its surroundings giving consideration to townscape, transport and other design and technical considerations.

12.16 For the reasons set out above, the proposed residential density is acceptable. The GLA has confirmed during pre-application discussions that the proposed density is acceptable noting that *“London Plan policy and the Mayor’s Housing SPG are clear that density ranges should not be applied mechanistically, and that an appropriate density will be the end result of a well-designed scheme which responds to local character and provides high-quality residential accommodation”*. It should be noted that the draft London Plan (November 2017) does not include a density matrix, although this currently does not hold any material weight.

12.17 **The calculated residential density is acceptable in planning policy terms.**

**b) Unit Mix**

12.18 The scheme seeks to provide a range of unit sizes, with a significant amount being family sized accommodation. The residential within Development Area 1 (443 units) is coming forward in full detail. The residential within Development Area 2 (up to 224 units, or up to 374 if the assisted living units come forward as residential) is coming forward in outline. The mix has been designed for Development Area 1 – the mix for Development Area 2 will be agreed via Reserved Matters submissions. For the purposes of the technical assessments, an assumption has been made on unit mix to ensure a robust and full assessment of the potential impacts of the proposed development.

12.19 London Plan Policy 3.8 seeks a balanced mix of unit types and sizes in new developments. The Mayor’s Housing SPG states that development proposals should demonstrate how the mix of dwelling types, sizes and tenures meet strategic and local needs and are appropriate to the location.

12.20 LBRuT’s DMP (Policy DM HO 4) and the emerging Local Plan (Policy LP 35) state that residential development should generally provide family-sized accommodation although emerging Policy LP 35 notes that within AMUs (where the former Stag Brewery site is located), *“a higher proportion of small units would be appropriate”*. Housing mix should be appropriate to the location. As set out within the DMP and the

emerging Local Plan, LBRuT class ‘family housing’ generally as having 3+ bedrooms however, where units of a suitable size are provided (meeting the Nationally Described Space Standard and the external amenity standards), a 2 bedroom unit can be designed for 3 or 4 persons and would be considered as family housing.

12.21 Detailed pre-application discussions have taken place with LBRuT (Planning and Housing Teams) and GLA officers in respect of residential mix, and the proposed development reflects these discussions.

12.22 The proposed unit mix for Development Area 1 is set out in table 9:

Unit Type	1-bed	2-bed (family)*	3-bed	4-bed	Total
<b>Number</b>	65	232	138	8	443
<b>% of total</b>	15%	52%	31%	2%	100%
<b>Family sized accommodation (2 bed family, 3 bed and 4 bed units) as a % of total proposed</b>					<b>85%</b>

**Table 9: Proposed Unit Mix for Development Area 1 (East of Ship Lane - Detailed Application)**

\* 2 bed 3 or 4 person units can be classified as ‘family’ sized accommodation, as per LBRuT’s DMP glossary and the emerging Local Plan glossary

12.23 Table 9 demonstrates that the scheme will provide a significant amount of family sized accommodation (85%). An appropriate amount of smaller housing is also proposed, and this is acceptable given the Site’s location within an AMU, which is supported by emerging Local Plan Policy LP 35.

12.24 The affordable housing is to be of following mix, which has been agreed with LBRuT officers:

Unit Type	Rent	Intermediate
1-bed	5%	60%
2-bed	40%	40%
3-bed	50%	0%
4-bed+	5%	0%

**Table 10: Affordable housing mix**

12.25 As set out within this section of the Town Planning Statement, and in other submission documents, the residential units would be provided to an extremely high standard. They would provide a range of housing size options for new residents. Encouraging this mixed community is in line with the aspirations of the SBPB to create a 'village heart'.

12.26 **The proposed residential mix would provide a mix of unit sizes which would help to create a vibrant new community within Mortlake. The confirmed mix for Development Area 1 would deliver a significant amount of family sized housing (85%) alongside smaller accommodation (15%). This mix is acceptable in line with the Site's location within an AMU.**

**c) Housing Quality / Design Standards**

12.27 London Plan Policy 3.5 requires housing developments to be of the highest quality internally, externally and in relation to their context and the wider environment. Further detailed guidance on housing quality is provided within the Mayor's Housing SPG, in relation to amenity space, aspect, outlook and overlooking. These requirements are reflected in LBRuT Core Strategy Policy CP 14, DMP DM HO 4, emerging Local Plan Policy LP 35 and LBRuT's Residential Development Standards SPG (2010). This section demonstrates how the scheme would deliver homes of

excellent quality internally, and how appropriate external space would be provided. The external design of the new residential units is not assessed in this section and is included at section 13 of this Town Planning Statement and within the submitted Design and Access Statement.

*Unit Sizes and Configuration*

- 12.28 London Plan Policy 3.5, LBRuT DMP Policy HO 4 and emerging Local Plan Policy LP 35 all require new residential development to comply with the Government's Nationally Described Space Standards ('National Space Standards') (March 2015). These standards set minimum space standards (GIA sqm) for new residential units, based on unit mix and type. The National Space Standards, London Plan (Policy 3.5 and paragraph 3.36) and the Mayor's Housing SPG (Standard 24) are clear that these floorspaces are minimum standards. Developers are encouraged to exceed these standards to deliver good quality housing (Mayor's Housing SPG, paragraph 2.3.25).
- 12.29 As previously set out, the residential elements proposed in Development Area 2 are only applied for in outline and, therefore, the size and configuration of residential units has not been determined at this stage. As part of Reserved Matters (layout), detailed plans will confirm compliance with the minimum standards.
- 12.30 The Development Area 1 (detailed) residential units would also meet or exceed the National Space Standards. All units are proposed to be provided with in-built storage in line with standards. The units would also meet the design standards set out in the Mayor's Housing SPG in terms of room dimensions / areas and layout of rooms. All units would also benefit from good floor to ceiling heights.
- 12.31 **All residential units proposed across the scheme would meet the Government's minimum National Space Standards, ensuring high quality living environments for future residents. Where appropriate, and as encouraged by the Mayor, residential units would exceed these minimum standards.**

*Amenity Space*

- 12.32 Both the London Plan and LBRuT's planning policies and guidance require the provision of adequate amenity space for new residential units. The Mayor's Housing

SPG states that a minimum of 5 sqm private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant (Standard 26). The minimum depth and width for all balconies and other private external spaces should be 1,500mm (Standard 27).

12.33 LBRuT DMP Policy DM DC 6 states that purpose built, well-designed and positioned balconies or terraces are encouraged where new residential units are on upper floors. LBRuT's Residential Design Standards SPG reflects the GLA area requirements and sets out that ideally family sized accommodation for young families should have direct and easy access to a good sized private garden. It is recognised that flats at upper levels may share a community garden and have a private balcony area, if of an acceptable design.

12.34 The residential units within Development Area 1 are coming forward in full detail and the amenity space has been confirmed. Private amenity space is provided in the form of balconies at upper levels of buildings and private garden areas at ground floor level. The balconies and garden areas all have a minimum depth of 1,500mm to ensure that wheelchair access is possible.

12.35 The residential within Development Area 2 is coming forward in outline and as such, the detailed amenity space provision cannot be confirmed at this stage and will be developed during the detailed design stage. All units would, however, provide adequate amenity space which will meet the minimum requirements. In particular, the new townhouses within blocks 20 and 21 would provide privately accessible gardens.

12.36 **Appropriate amenity space would be provided for all new residential units, in line with Mayoral and LBRuT design standards.**

*Playspace*

12.37 London Plan Policy 3.6 requires new residential development to provide play and informal recreation space, based on the expected child population generated by the scheme and an assessment of future needs. Additional guidance on the provision of playspace is contained within the GLA's Play and Informal Recreation SPG (2012). The SPG states at paragraph 4.16 that the benchmark standard recommends a

minimum of 10 sqm per child. Boroughs are able to set their own standards.

- 12.38 Local planning policy also reflects the requirements for playspace provision and DMP Policy DM OS 7 reflects the Mayor's benchmark standards. Emerging Local Plan Policy LP 31 requires residential development to provide playspace and calculate the child yield based on the Planning Obligations SPD (2014) calculation, which differs from the GLA calculation.
- 12.39 The scheme proposes play space for different age groups across the Site and this would be positioned within residential courtyards, parks, plazas and open spaces around the Site. As set out in the submitted Landscape Design and Access Statement, prepared by Gillespies, play elements and facilities are provided in a range of forms within the public and private realm, including through fenced playgrounds, unfenced but contained play spaces, topographic variation and play opportunities in the landscape and 'play on the way' elements within circulation spaces and public realm areas. The school play facilities (indoor and outdoor) would also be available for use by children as play facilities, via the Community Use Agreement which would secure community access to these spaces out of school hours.
- 12.40 Approximately 1,830 sqm playspace would be provided for the residential units within Development Area 1 which is significantly above GLA benchmark standards (which generates a need for 696 sqm playspace).
- 12.41 Development Area 2 is submitted in outline and subsequently, the exact playspace requirement cannot be calculated as the final mix is unknown. However, assumptions on likely mix have been made to ensure that the scheme can provide for sufficient playspace to meet, and where possible, exceed GLA playspace requirements. Overall, the scheme could provide 4,084 sqm playspace, which is significantly above the GLA target of 2,810 sqm but below the LBRuT target of 6,631 sqm. However, this total amount excludes the contribution that the school play facilities would make to providing local playspace – when factoring in a pro-rata approach to the school facilities which accounts for out-of-hours community use, the scheme could provide 6,907 sqm playspace, which is above the high LBRuT target.
- 12.42 **Based on the quantum and quality of playspace proposed, its location within**



**the scheme and the range and variety of playspace types, including shared community use of the full size 3G football pitch, the proposed development provides appropriate playspace in line with London Plan and LBRuT expectations and requirements.**

*Accessibility*

- 12.43 In accordance with London Plan (Policy 3.8) and LBRuT requirements (Core Strategy Policy CP 14 and emerging Local Plan Policy LP 35), at least 10% of the proposed residential units would be designed to be wheelchair user units (i.e. in line with part M4(3) of the Building Regulations). The remainder of units would be built to M4(2) standards, i.e. wheelchair accessible and adaptable. These units have been designed for the detailed residential elements within Development Area 1 and are shown on the submitted drawings.
- 12.44 The Design Code for the outline residential units includes a mandatory requirement to provide the residential units as easily adapted for compliance with wheelchair housing design standards and they must have level thresholds to provide inclusive access.
- 12.45 **The residential units would provide wheelchair access, with at least 10% of the proposed residential units within Development Area 1 to be wheelchair units, in line with policy requirements. The residential units coming forward in outline must also provide for wheelchair accessibility, in line with housing design standards.**

*Aspect and Privacy*

- 12.46 All residential units have been designed to give the new residents appropriate levels of light and suitable living conditions, along with suitable levels of privacy. This is demonstrated on the submitted floorplans for the Development Area 1 units (applied for in full detail). The residential units for Development Area 2 would be designed to these same standards. It should be noted that the building locations within Development Area 2 will be fixed (although with a small degree of flexibility for movement under parameters) under the outline permission so the privacy element of these units will be fixed at outline stage.

12.47 Standard 28 in the Mayor's SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. LBRuT's DMP Policy DM DC 5 and emerging Local Plan (Policy LP 28) requires development to ensure that there is a minimum distance of 20 metres between main facing windows of habitable rooms. The emerging Local Plan goes on to state that where principal windows face a wall that includes no windows or those that are occluded, separation distances can be reduced to 13.5m (paragraph 4.8.8). The proposed flat layouts have been set to maximise views and protect privacy between buildings. Within Development Area 1, most buildings have at least one aspect that is less than 20m from the next building however the majority of dwellings would also be provided with an aspect of 20m or more as well. With regard to the dwellings coming forward in Development Area 2, these are yet to be designed in detail but generally the street widths to be provided between buildings are wide and dwellings would have adequate privacy. Where buildings do face on to each other, habitable rooms would be positioned and obscured windows would be provided to help limit overlooking issues.

12.48 Standard 29 in the Mayor's Housing SPG and the LBRuT Residential Development Standards require dual aspect units wherever possible. In particular, the Housing SPG states that north facing single aspect units, or units which are exposed to significant noise levels or which contain three + bedrooms should be avoided. LBRuT's Residential Design Standards SPD also encourages the development of dual aspect units, in order to allow cross ventilation. The number of north-facing single aspect units has been minimised and comprises less than 5% of the total residential development.

12.49 **The residential building layouts and dwellings have been designed to provide adequate levels of privacy and minimise the number of single aspect units, in line with residential design guidance.**

*Shared Circulation*

12.50 Standard 12 of the Mayor's Housing SPG requires each residential core to be accessible to generally no more than 8 units on each floor. Standards 13 to 16 set out further design standards for shared circulation, including access provisions, natural

light and ventilation requirements and lift access. The submitted Housing Assessment Matrix, prepared by Squire & Partners, demonstrates compliance with these standards.

### **Residential Design – Conclusions**

- 12.51 This section demonstrates that the proposed residential units would be of excellent quality and would provide suitable living conditions for the new residents. Residential density is appropriate for the Site’s location and unit mix and sizes are in line with relevant policies and guidance.**

## 13 Planning Considerations – Design and Layout

- 13.1 This section assesses the proposed design of the development, specifically:
- a) Masterplan and character areas
  - b) Layout
  - c) Heights
  - d) Massing and density
  - e) Design Typology and Materials
  - f) Inclusive access
  - g) Basements
  - h) School design
- 13.2 This section does not consider the design of the proposed residential units – this is assessed with Chapter 12 of this Town Planning Statement. This section to be read alongside further detail on the development design set out within the submitted Design and Access Statement volumes, prepared by Squire & Partners and submitted in support of Applications A and B.
- 13.3 As set out in chapter 7 of this Town Planning Statement, the design of the proposed development has evolved through extensive consultation with the local community, LBRuT officers and councillors, and other stakeholders and statutory bodies including the GLA. Significant amendments have been made to the design, layout and quantum of development as a direct result of these pre-application discussions.

### **Policy Context**

- 13.4 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development.
- 13.5 Paragraph 56 of the NPPF states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. At paragraph 57, the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

- 13.6 The PPG on Design, which builds on section 7 of the NPPF, states that LPAs are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area: *“Planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting) which is not outweighed by the proposal’s economic, social and environmental benefits”*.
- 13.7 The PPG states that new or changing places should have the following qualities commonly exhibited by successful, well-designed places:
- i Be functional;
  - ii Support mixed uses and tenures;
  - iii Include successful public spaces;
  - iv Be adaptable and resilient;
  - v Have a distinctive character;
  - vi Be attractive; and
  - vii Encourage ease of movement.
- 13.8 London Plan Policy 7.1 requires good quality environments to be provided which have the best possible access to services, infrastructure and public transport. It states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.
- 13.9 In addition Policy 7.1 requires that buildings should: provide a high quality design response that *inter alia*, has regard to the pattern and grain of the existing spaces and streets in terms of orientation, scale, proportion and mass; contribute to a positive relationship between the urban structure and local natural landscape features, including the underlying landform and topography of an area; be human in

scale and be informed by the surrounding historic environment.

- 13.10 London Plan Policy 7.4 states that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing a character for the future function of the area.
- 13.11 London Plan Policy 7.6 sets out a series of overarching design principles for development in London, seeking to incorporate the highest quality materials and design appropriate to its context. The policy seeks buildings and structures to: be of the highest architectural quality; be of a proportion, composition, scale and orientation that enhances, activates and appropriately define the public realm; comprise details and materials that complement the character of the area; incorporate best practice in resource management and climate change mitigation; and meet the principles of inclusive design.
- 13.12 With regard to crime and security, London Plan Policies 7.3 and 7.13 require development to reduce opportunities for criminal behaviour and to contribute to the minimisation of potential physical risks.
- 13.13 At a local level, LBRuT Core Strategy Policy CP 7 requires that all new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Development proposals will need to demonstrate that they are based on an analysis and understanding of the Borough's context and connect positively with their surroundings to create safe and inclusive places through the use of good design principles.
- 13.14 This approach is reflected in DMP Policy DM DC 1 and emerging Local Plan Policy LP 1 which state that all development should be of high architectural and urban design quality. Draft Policy LP 1 sets out a list of criteria that will be used in assessing development proposals which are as follows:
- 1) 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;

- 2) Sustainable design and construction, including adaptability, subject to aesthetic considerations;
- 3) Layout, siting and access, including making best use of land;
- 4) Space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
- 5) Inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
- 6) Suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.

13.15 Specifically with regard to mixed use developments, DMP Policy DM DC 2 states that where mixed use schemes are acceptable, they should optimise the use of land and consider layout and mix of uses to minimise conflict between uses and users.

13.16 Draft Local Plan Policy LP 2 sets out LBRuT's approach to building heights. It states that new buildings should be of appropriate heights which respect and strengthen the setting of the Borough's valued townscapes and landscapes. This should be achieved through buildings making a positive contribution towards local character, townscape and skyline, generally reflecting the prevailing building heights in the vicinity and preserving and enhancing heritage assets. The policy discourages the use of height to express and create local landmarks, and states that LBRuT will resist buildings that are taller than the surrounding townscape other than in exceptional circumstances. Respecting the local context and enhancing the character of an area should be achieved through appropriate: scale; height; mass; urban pattern; development grain; materials; streetscape; roofscape; and wider townscape and landscape.

13.17 The SBPB sets out the key principles for the design of development on the Site. The

Brief lists the key issues related to the development of the site as:

- 1) The visual relationship of the Site to the surrounding area, including views up and down stream and across the River Thames, together with key views towards and into the Site;
- 2) The existing urban grain and scale;
- 3) The opportunity to significantly enhance the character and appearance of the area through high quality development;
- 4) Permeability and specifically, the opportunity to visually and functionally link the Site with surrounding areas and with the substantial riverside frontage; and
- 5) The incorporation of the principles of sustainable design and construction.

13.18 The Brief requires a comprehensive approach to the development of the Site to prevent it being developed in a piecemeal fashion and create a master plan for progressive long term development. The Brief states that development should achieve high quality, sustainable and inspirational design of both buildings and open space using different design approaches and materials to avoid a similar approach across the whole site. The use of brick, stone, stucco and render is encouraged to reflect the traditional character of the site's surroundings.

13.19 In terms of building height, the Brief notes that the Site is within an area which may offer opportunities for new development of around six storeys. New buildings should be less than the height of the Former Maltings Building and development should consider views of this building to ensure this is not obscured or subsumed by new surrounding development. A mix of heights across the Site will be required to reflect and relate to the existing urban grain and scale. If taller buildings are necessary to ensure a viable scheme, 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 should diminish towards the perimeter of the Site or along the riverside. Buildings must be designed to include variations in height and roof profile; including an appropriate set back from the towpath at ground level and at upper floor levels. A plan at Appendix 1 of the Brief indicates maximum heights that would generally be acceptable on the Site.



13.20 LBRuT's 'Design Quality' SPD (2006) states that design should reflect the locality, but 'be honest to its time' (p. 14). Furthermore, the retention, refurbishment and reuse of historic or older buildings is supported, where they are deemed to make a positive contribution to the site (p. 27).

### **Assessment**

#### *a) Masterplan and Character Areas*

13.21 Volume 1 of the submitted Design and Access Statement outlines the overall design principles for the masterplan and provides an overview of the character areas which make up the proposed development. The masterplan incorporates both sides of the Site (Development Area 1 and 2 and the school) and incorporates 22 individual buildings, with the former Maltings Building to be retained, and new buildings to be constructed behind retained façades of the Former Bottling Hall and Former Hotel Building. The scheme proposes to introduce distinct character areas across the Site, which reflect their intended use and level of public interaction. The design of the buildings and the public and private spaces around them reflect the character area design cues.

13.22 The architects, Squire & Partners, have brought forward a number of design principles primarily derived from the SBPB, to inform the design of the overall masterplan vision. These include creating permeable routes through the site, retaining and respecting heritage assets, creating a mix of uses including a new high street and a secondary school and playing field and inclusion of residential courtyards. The overarching objective is to create a new distinctive area at the heart of Mortlake which will be an attractive place to live, work, study and visit.

13.23 Building upon these principles, character areas with the site have been developed based on their location, form and uses. These character areas include:

- 1) A new 'high street' with a focus on activity, retail and other non-residential uses such as the cinema, including a warehouse building typology.
- 2) A 'riverside' area with public spaces opening to the river and a range of narrow streets and wider routes, including riverside housing with a mansion block

building typology.

- 3) An area of 'gardens' is identified with more enclosed spaces and more intimate planting.
- 4) A 'quadrangle' character is proposed for the area around and incorporating the large element of the secondary school.
- 5) Finally, a more formal square with an open garden space which is surrounded by buildings of a similar height and character.

13.24 These character areas respond to their context which is a key objective of policy at national, regional and local levels but also create distinctive areas to avoid homogenous development, as required by the SBPB. The overall design principles for the masterplan vision ensure a coordinated and consistent approach across the Site, with the proposed scheme exemplifying the highest quality urban design. It is considered that the proposed development represents sustainable development in accordance with the NPPF and complies with London Plan and local planning policy and guidance.

*b) Layout*

13.25 The layout of the proposed development takes cues from the grain and pattern of terrace streets found in the Mortlake area. This evolved by introducing new routes from the existing village to the riverside, creating permeability that is currently limited by the Brewery enclosure and fulfilling a key objective of the SBPB. The masterplan also includes a wide 'green link' (measuring from 30m to 38m) which provides a heart to the scheme and acts as both a park and a street leading from Mortlake Green to the riverfront. The green link has been widened and straightened during the design evolution process, in response to feedback from the local community and LBRuT. The new high street ('Thames Street') is the main cross-street which defines the primarily residential blocks to the north and principally commercial buildings to the south.

13.26 Public open spaces are created adjacent to the primary heritage buildings on the Site, which facilitates a continuation of the liveliness of the high street into these spaces. These spaces are the Maltings Plaza outside of the refurbished Maltings

Building (block 4) and the Bottleworks Square, the new open space to the rear of blocks 5 and 6, which are being developed behind the retained façades of the Former Bottling Hall and Former Hotel Building. In addition, quieter open spaces are located to the ‘rear’ of the residential blocks formed by the principal routes. Larger landscaped spaces in the western part of the site (Development Area 2) are more disparate, creating a different character for each collection of buildings. Further detail on the proposed public realm and landscaping can be found within section 14 of this Town Planning Statement and within the submitted Landscape Design and Access Statement, prepared by Gillespies.

13.27 The proposed layout of residential units and in particular living areas within these units is designed to be both maximise views to the surrounding area but also to minimise privacy issues to adjacent buildings. Further details on residential design and quality can be found within section 12 of this Town Planning Statement and within the submitted Design and Access Statement and Housing Assessment Matrix, prepared by Squire & Partners.

13.28 **The urban structure and layout of the masterplan creates a diversity of spaces and character areas connected by a clear framework of routes which provide parameters for the built form, which respond appropriately to the local context in accordance with London Plan and local planning policy and guidance, including the SBPB.**

*c) Heights*

13.29 Careful consideration has been given to the heights of the proposed buildings and care has been taken with respect of impact on nearby Conservation Areas, listed buildings and local views and context.

13.30 Whilst proposed building heights largely comply with the indicative heights set out in the SBPB, there are a small number of instances where these guidelines are exceeded as identified in the Design and Access Statement. This is to ensure the scheme is viable and to allow for a mix of heights across the masterplan to create interest and variety in the proposed townscape. It should also be noted that there are a number of instances where the proposed building heights do not exceed

guidelines and are in fact, lower than suggested building height guidelines.

13.31 The proposed development generally accords with the principle outlined in the SBPB that height should be greatest in the centre of the site and drop significantly towards the edges to the east, south and west. However, this is not the case to the north adjacent to the riverside, where the proposed buildings are between 4 and 6 storeys. Whilst it is recognised that this does not follow the guidance in the Planning Brief, there are a number of reasons which justify a departure in this instance:

- a) Historically the Site's industrial use has meant that buildings by the river have been of significant height, as demonstrated by the existing Maltings Building.
- b) There are numerous examples of older mansion style blocks and contemporary precedents by the river (as outlined in the Design and Access Statement) which successfully strike the balance between incorporating an appropriate set-back to avoid overshadowing the riverside but are also prominent enough to bring character to the frontage.
- c) The buildings have been designed to avoid a continuous line of development on the riverside through the inclusion of landscaped spaces and routes through to Mortlake High Street. The mix of building heights in this part of the Site, set-backs at upper levels and variety of frontage line and circulation between the buildings and river wall ensure that the proposed development does not dominate the towpath or riverside environment.
- d) The impact of this part of the development on townscape has been tested (as outlined in the ES) and it has been demonstrated that there will be no adverse impact on views to the river through the Site.

13.32 **The proposed development includes buildings of appropriate heights which respect and strengthen the local townscape context in accordance with draft Local Plan Policy LP 2. The mix of building heights proposed generally align with the guidelines set out in the Planning Brief and any minor divergence is justified on the merits of the scheme which exemplifies architectural design of the highest quality.**

*d) Massing and density*

- 13.33 The Site area of the former Stag Brewery Site (i.e. Applications A and B) is 9.25 ha. As set out within the submitted OSPPA, the total amenity space provided throughout the development amounts to 4.75ha (51% of the site area). This open space to building footprint ratio is considered appropriate in the Site's context. Residential density is assessed with chapter 12 of this Town Planning Statement.
- 13.34 The townscape assessment within the ES (Chapter 16) demonstrates that the building massing rises to the centre of the site and diminishes to the east and west, as required by the SBPB. The proposals avoid continuous development on the riverside and the mass of buildings is broken up through the network of north-south and east-west routes through the site, the range of landscaped open spaces, set-backs at upper levels and variation in the architectural detailing of facades and roofscapes.
- 13.35 **On the above basis, the overall density of development and massing of buildings is appropriate to the Site's setting and surrounding built form.**

**Design Typology and Materials**

- 13.36 A series of common architectural themes have emerged which are reflected across the buildings which not only pick up on typologies of the local context but also those common to riverside locations in the wider area. The design intent of the outline element of the hybrid planning application (Application A – Development Area 2) is considered at a more strategy level and will be guided at Reserved Matters stage by the Design Codes. Squire & Partners have developed three distinct building typologies for the detailed elements (Application A – Development Area 1), including:
- a) 'Warehouse' typology – mostly located in the southern part of the Site by Mortlake High Street, this draws on the style of the heritage buildings onsite to create an archetypal warehouse typology in terms of the rhythm of the façade and window openings.
  - b) 'Mansion Block' typology – mostly located in the northern part of the Site, this is

a contemporary interpretation of the typical mansion block buildings found along the river.

- c) 'Cinema' typology – this is unique in the masterplan as it only relates to the proposed cinema which is located in a prominent position on the junction of the green link with Lower Richmond Road. It follows an art-deco typology including a grand entrance and horizontal canopy, and distinctive 'scalloped bays' and a multitude of windows at upper levels.

13.37 The retained heritage buildings have their own distinct character which will be enhanced through the proposed careful interventions into their fabric. Please refer to chapter 16 of this Town Planning Statement and the submitted Built Heritage Assessment (Chapter 15 of the ES) for further details.

13.38 The indicative material palette for the proposed development is drawn from existing textures, colours, features and styles found in both the building context surrounding the site and its industrial heritage. Accordingly, the predominant material across the proposed development is brick, expressed through a different brick colour for each set of buildings whilst all remaining a red tone for consistency. Additional detailing, such as metalwork, window frames and decorative balustrades, is utilised to give a common aesthetic to the new buildings that links them to the character of the site.

13.39 **The current proposed scheme responds well to the surrounding context and that the use of set-backs and different architectural materials and styles ensures the scheme is aligned with its surroundings.**

#### **Inclusive access**

13.40 The proposed development also provides an excellent level of inclusive design. Full explanation of the proposed inclusive access details are set out within the Design and Access Statement, however, the key access provisions for the proposed development include:

- a) Incorporation of the principles for inclusive design wherever possible;
- b) Accessible routes to all connections with local pedestrian routes and public transport, with a drop off area provided to the east of the site accessed via

Mortlake High Street;

- c) Inclusion of on-site car parking for blue badge holders;
- d) Step-free access to all public and residential parts of the buildings, with all slopes to public realm areas designed to a maximum of 1:22 or better; and
- e) Wheelchair accessible and adaptable residential units would be provided – see section 12 of this Town Planning Statement.

13.41 The principles of accessible and inclusive design are integral to the proposed development in accordance with London Plan Policy 7.2 and 7.6 and the requirements of building regulations.

### **Basements**

13.42 There will be two single storey basements under the majority of the Site and buildings – one under Development Area 1 and one under Development Area 2. No basement is proposed underneath the townhouses (blocks 20 and 21) or under the school. The basements would provide car parking and plant space for the wider development. The only external manifestations of the basement structure would be vehicle entrances which include appropriate build-up of levels to act as passive flood protection. The design of the basement is appropriate to its function and it would not have any adverse impact on the surrounding character and appearance of the building form surrounding the Site.

### **School – Design Considerations**

13.43 The proposed secondary school is a distinct element within the wider Stag Brewery masterplan and forms a separate application for full planning permission (Application B). Details of the design and landscaping approach can be found within the submitted Design and Access Statement for Application B. The Applicant has worked closely with the LBRuT and ESFA on the proposed design to ensure it addresses the rest of the scheme and surrounding context but is also fit for purpose.

13.44 The location and orientation of the school was subject to extensive discussions at pre-application stage, with the final selection to the west of Ship Lane aligning the

closest to the indicative layout included in the SBPB. This location also minimises the built form on the existing playing fields and is set away from Williams Lane, therefore reducing the potential impact on existing residential properties in this area. Overall, it is considered the optimal location for this facility within the masterplan. Further detail on the evolution of the school location can be found within the submitted OSPPA.

- 13.45 The design approach to the school was informed by ‘Area guidelines for mainstream schools’ published in 2014 by the EFSA and the Department for Education (DfE). It comprises a three storey ‘superblock’ to accommodate circa 1,200 students incorporating a sports hall and open plan dining hall. A full sized sports pitch is situated to the rear, a MUGA is provided to the south, and a separate area is designated for play at roof level. Full details of the proposed play facilities and how these can be accessed and used by the community are set out within the submitted OSPPA, prepared by Gerald Eve LLP.
- 13.46 The building form and massing is a rectangular three storey block with a repeated grid of brick piers. The building façade is designed to be a rational expression of the internal rhythm of the building with the emphasis on entrances and exits. Materials include light coloured stock bricks which respond appropriately to the surrounding context other typologies within the masterplan.
- 13.47 The design of the proposed school represents high quality and durability which is reflective of its function. Its height, scale and mass are in keeping with the local context and its location minimises the impact on the existing planning fields and nearby residential amenity. It is fully in accordance with the objectives of the NPPF, London Plan and local policy.
- 13.48 **Overall, the design of the proposed development is a high quality that has been developed with close regard to the surrounding context in terms of scale, massing and orientation. The proposed buildings, and the public spaces and streets between them, would create an attractive and distinctive place that will enhance the character of the Mortlake area as well as significantly improving its legibility and permeability, in accordance with the policies of the London Plan, Core Strategy and draft Local Plan, and guidance**



**within the Planning Brief.**

## 14 Planning Considerations – Public Realm, Landscaping and Design of Open Spaces

### Public Realm and Landscape Strategy Overview

- 14.1 **Integrating well-designed open and green spaces and improving the permeability of the Site has been fundamental to the masterplanning of the scheme, which is in line with the Council’s vision for the Site as set out within the SBPB and the emerging Site Allocation.**
- 14.2 Landscape architects Gillespies have worked closely with the architects, LBRuT and relevant stakeholders to develop a landscape and public realm which is accessible, sustainable and functional and which complements the design of the built environment by providing external spaces that maximise the enjoyment of and connection to the wider context.
- 14.3 The proposed landscaping works can be split into different components for each application. These components are described in this section and set out in greater detail in the documents as shown in table 11 below.

Landscaping Component	Further Detail Provided In
Application A (Development Area 1) – areas to be applied for in detail under the hybrid application	Landscape Design and Access Statement, prepared by Gillespies
Application A (Development Area 2) – areas to be applied for in outline under the hybrid application	Design Code, prepared by Squire & Partners with input from Gillespies (for outline elements only)
Application B (School)	Design and Access Statement, prepared by Squire & Partners, with landscape section prepared by Gillespies
Application C (Chalkers Corner)	Chalkers Corner Landscape Design and Access Statement

**Table 11: Landscaping Components**

- 14.4 The public realm and landscape proposals are in accordance with planning policy objectives, with the importance of delivering attractive, legible and accessible public and private spaces being recognised at all policy levels. NPPF paragraphs 57, 58 and 69 stress the importance of a good public realm in delivering well designed mixed use developments and healthy communities.
- 14.5 Part A of London Plan Policy 7.5 states that London’s public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Policy 2.18 encourages all relevant partners to protect, promote, expand and manage the extent and quality of, and access to, London’s network of green infrastructure. Urban greening would also be promoted and encouraged (Policy 5.10); major development proposals should also be designed to include roof, wall and site planting, especially green roofs and walls where feasible (Policy 5.11).
- 14.6 LBRuT’s Strategic Vision (as set out within the emerging Local Plan) also encourages the development of an attractive public realm which encourages walking and cycling. This Vision is supported by emerging Local Plan Policy LP 1, DMP Policies DM DC 1 and DM OS 6, the Design Quality SPD (2006) and the Public Space Design Guide (2006). With regard to green infrastructure, emerging Local Plan Policy LP 12 encourages the enhancement of green infrastructure. Associated with this aim, DMP Policy DM SD 5 and emerging Local Plan Policy LP 17 state that major developments should incorporate green and brown roofs into schemes, with the aim to be to use at least 70% of any potential roof plate as a green/brown roof.
- 14.7 The Landscape Design and Access Statement explains that the masterplan is founded on a concept of built form interspersed with a range of open spaces with pedestrian priority as the focus of the public realm. A variety of open spaces would be provided which would create different spaces and provide different functions. Depending on the function of the space, some of the public realm would be private (e.g. the townhouse gardens), or public (e.g. the residential courtyards and the open spaces around the commercial uses). The approach to public realm has also sought to increase permeability to and through the Site and improve public access, in line with LBRuT DMP Policy DM OS 6. Where appropriate, the public realm has sought

to take cues from the history of the Site and the local area, in accordance with London Plan Policy 7.5.

- 14.8 In accordance with London Plan Policy 7.5 and LBRuT's Public Space Design Guide, the scheme would seek to develop public art within the new landscape, including sculptures, play installations, paving art, light and sound pieces, and other types of art.
- 14.9 As set out within the Landscape Design and Access Statement, the approach to landscaping has been to select species and types of planting which would deliver a mix of native, locally adapted and exotic plants to increase biodiversity and a sustainable mix of plants with improved drought resistance and longevity. This is in accordance with London Plan Policy 2.18 and LBRuT emerging Local Plan Policy LP 12 to encourage green infrastructure. Green and brown roofs would be provided at roof level, in accordance with London Plan Policies 5.10, 5.11, LBRuT DMP Policy DM SD 5 and emerging Local Plan LP 17. The amount provided needs to be balanced against the requirement for necessary plant and machinery, renewable technologies (photovoltaic panels) and consideration of visual impact. Detailed designs of the roofscapes for the buildings to be provided within Development Area 2 will be secured via future Reserved Matters submissions. The green/brown roofs would be provided in addition to the significant amount of publicly accessible open and green space provided throughout the scheme.

*Public Realm and Landscape Strategy – Application A (Development Area 1)*

- 14.10 The main elements of public realm for the detailed elements of Application A are set out as follows:
- a) Green link – A new 'Linear Park' which would provide views and access from Mortlake Green to the riverside. Following consultation with LBRuT and the local community, this link has increased in size and straightened. The link would provide an attractive public route, commencing in a public plaza at the entrance to the Site from Lower Richmond Road.
  - b) Maltings Plaza – A defined, high quality public space outside the Maltings Building and fronting the River Thames. This space would provide play and recreation opportunities at the termination of the new green link.

- c) Ship Lane – It is proposed that this street would provide wider footways and landscaping (including retention of all trees) to provide a functional and attractive street.
- d) High Street – The new high street running east-west through the centre of Development Area 1 would be a pedestrianised zone which would encourage activity and engagement with the new ground floor commercial uses.
- e) Bottleworks Square – A new square would be provided to the rear of the Former Bottling Building and Former Hotel (blocks 5 and 6) and would provide a functional space for visitors and residents.
- f) River Terrace (separate from towpath) – This space would provide an attractive public walkway and outdoor dining opportunities associated with active retail frontages at ground floor level to enliven and activate the space. This route also provides access down to the towpath along the Site frontage to the river, above any flood level and would include incidental ‘play on the way’ elements for children.

*Public Realm and Landscape Strategy – Application A (Development Area 2)*

14.11 Landscaping details for Development Area 2 will be agreed and secured via future Reserved Matters submissions to LBRuT. The submitted Design Code and parameter plans set out landscape requirements future Reserved Matters submissions will need to be in line with.

14.12 As set out within the landscape section of Design Code, the public realm objectives for Development Area 2 are:

- a) Provide permeability and connectivity;
- b) Be accessible, inclusive and safe;
- c) Be simple, consistent, of high quality and minimise clutter;
- d) Reflect the site’s special qualities and distinctive character;
- e) Be multi-purpose and flexible;
- f) Provide amenity; and
- g) Be sustainable.

14.13 The submitted Public and Private Realm Parameter Plan sets out how open space

will be provided within Development Area 2. Flexible open spaces will be provided with planting and playspace to be provided for the new residents. A new community park will be provided to the south-west of the new school which will be publicly accessible and will provide play facilities for children.

- 14.14 The existing Site does not provide any public access and currently acts as a barrier between Mortlake and the river. The proposed development will open up the Site through the creation of a number of attractive and varied thoroughfares and new open spaces. A significant amount of new green open space and amenity space will be provided, which can be enjoyed by new and existing local residents and visitors.**

*Public Realm and Landscape Strategy – Application B (School)*

- 14.15 The public realm and open spaces to be provided for the new school (Application B) are intrinsically linked to the function that these spaces will need to provide for the new school users and the wider community. The school would include the provision of a new MUGA, a full sized 3G external playing pitch as well as internal and roof level facilities. Further details on the proposed school facilities, and how community access for their use would be secured, can be found in the submitted Design and Access Statement, prepared by Squire & Partners, and the OSPPA, prepared by Gerald Eve LLP.

- 14.16 The public realm and landscaping around the school itself would deliver an attractive public realm which operates as a functional space. In line with London Plan Policy 7.5, the proposed materials, planting and street furniture has been selected to match the required needs of the new spaces. The submitted Design and Access Statement for Application B includes details on landscaping and public realm.

*Public Realm and Landscape Strategy – Application C (Chalkers Corner)*

- 14.17 At Chalkers Corner (Application C), a small area of existing open space would be removed to make way for the new works to the highways, which are necessary for the proposed development. New green and public spaces and proposed around Chalkers Corner, with new planting and trees. It is also proposed to replace the existing wall and fence towards Chertsey Court with a 2m high brick wall to help

mitigate against moving the road junction slightly closer. Further details of the proposed public realm works at Chalkers Corner can be found within the submitted Landscape Design and Access Statement (for Application C) and the OSPPA.

- 14.18 The project team has taken a considered approach to landscaping and public realm, and has sought to develop attractive spaces which are efficient and functional.**

**Green Space and Other Open Land of Townscape Importance**

- 14.19 The existing playing fields on the former Stag Brewery Site and some of the land around Chalkers Corner are designated as Other Open Land of Townscape Importance ('OOLTI'). Local planning policies seek to protect OOLTI, but they also allow for re-provision of the space in particular circumstances. London Plan Policy 7.18 also seeks to resist the loss of protected open spaces unless equivalent or better quality provision is made reflecting local needs. Under DMP Policy DMS OS 3 and emerging Local Plan Policy LP 14, the proposed development meets the specified criteria for the consideration of the re-distribution of OOLTI.
- 14.20 The existing playing fields would not be retained in their current form as the proposed development includes the provision of a new secondary school, with external sports and play facilities suitable for a school of this type and size. In place of the existing playing fields, the scheme would provide the new school (in part), the new school play facilities and a new community park. The existing facilities are not suitable for use by the new school and the proposed new facilities would be responding to the demand generated by the school, and they would also deliver substantial increased sporting benefits to the wider community. Further details are included within the submitted OSPPA.
- 14.21 Elsewhere across the Site, the masterplan has sought to provide new, publicly accessible and open spaces throughout. Of particular importance is the new green link, which will provide a significant area of public green space. Providing this link was a key aspiration of the SBPB. Following consultation with the GLA, LBRuT and the local community, the green link was expanded and straightened throughout the design evolution stages – the resulting link now provides a large and welcome

straight link from Mortlake Green to the riverside.

14.22 The submitted OSPPA, prepared by Gerald Eve LLP, assesses the acceptability of the loss of existing green space and OOLTI on the Site (Applications A and B), with Application C assessed separately within the report. The OSPPA concludes that the proposed development is acceptable in policy terms given the site-specific circumstances. For Applications A and B, it is noted that the proposed development would provide:

- a) A 49% increase of OOLTI qualifying open space when compared to existing (3.06 ha proposed compared to 2.06 ha existing);
- b) A significantly greater quantum of OOLTI qualifying open space than envisaged by the SBPB;
- c) The existing OOLTI space provides limited contribution to the local community (it is not publicly accessible), nor does it provide any other significant qualities (e.g. variety, landscape features, planting diversity, biodiversity etc). Conversely, the proposed dispersal of OOLTI space throughout the masterplan is a sound landscape approach, and one which would deliver high quality landscape throughout and benefits to the community;
- d) Much better quality OOLTI space than existing – the proposed OOLTI space would also be open and it would satisfy a greater range of OOLTI policy objectives than the existing space;
- e) 3.89 ha of publicly accessible open space (much of which is OOLTI qualifying), a significant increase when compared with the existing situation i.e. no publicly accessible space; and
- f) 4.75 ha of overall total amenity space would be provided throughout the development, which equates to 51% of the overall Site area.

14.23 Specifically in relation to Application C (Chalkers Corner), the OSPPA recognises that a very small amount of OOLTI space would be lost (net of 186 sqm). This very small loss is compensated by the fact that a significant masterplan-wide uplift in OOLTI is proposed and new and enhanced landscape and OOLTI at Chalkers Corner is proposed, much of which is closer to existing residential properties, thus providing amenity benefits.

14.24 **The submitted OSPPA demonstrates that the proposed development would**



**deliver significant benefits in terms of OOLTI – the amount, type, quality and accessibility of OOLTI space would be greatly improved from the existing situation and more OOLTI space is to be provided than was envisaged within the SBPB.**

### **Pedestrian and Cycle Connections**

- 14.25 As set out in section 15 of this Town Planning Statement, planning policy at all levels recognises the importance of helping to enable pedestrian and cycle movement in encouraging a shift towards more sustainable modes of travel. London Plan Policy 7.5 seeks for the public realm to provide well-designed places for pedestrians. The SBPB echoes this and at paragraph 5.34 states that the *“Council will expect proposals to assess the potential to create new pedestrian routes and improve cycle provision both within the site and linking to existing routes in the area”*. Pedestrian links across the Lower Richmond Road, Mortlake High Street and along Sheen Lane are particularly important to help link the local area to the river and to the new facilities to be provided by any mixed use scheme.
- 14.26 As set out within the submitted Landscape Design and Access Statement and the Transport Assessment, the proposed development includes the provision of a number of new pedestrian and cycle routes across the Site. The public realm has been designed to prioritise pedestrian movement but allowance has been made for appropriate sized cycle routes throughout the Site.
- 14.27 In terms of access to the Site, pedestrian and cycle access will be greatly improved. New pedestrian crossings will be provided within and to the Site, including a new pedestrian crossing from Mortlake Green to the proposed development and a new crossing further down on Lower Richmond Road which will help to provide safe and convenient access to the new school.
- 14.28 A new cycle route will also be created around Chalkers Corner, helping to improve safe cycle access to the Site.
- 14.29 **Currently, the Site provides no public access at all and acts as a barrier between Mortlake and the River. A key aspiration of the proposed development is to make the Site permeable and accessible. This would be**

achieved partly through the creation of new pedestrian and cycle connections to and throughout the Site, including new pedestrian crossing points along Lower Richmond Road and a new cycle lane at Chalkers Corner. Enabling these modes of transport via a well-designed public realm is in accordance with strategic planning priorities to encourage more sustainable modes of travel.

### **Towpath**

- 14.30 The existing towpath, which runs in an east-west direction along the northern boundary of Application A is outside the ownership of the Applicant; the PLA and LBRuT have control over this land. It is included within the Application A red line boundary to ensure delivery of agreed towpath works and as the SBPB specifically seeks any development to upgrade the existing towpath.
- 14.31 The project team have engaged in pre-application discussions with the PLA, LBRuT and local interest groups regarding the extent of proposed works to the towpath. There is a desire for works to the towpath to remain fairly minimal to preserve the current character of the route and therefore the scheme proposes minimal enhancement of the existing towpath. The works will include new paving, seating, planting and riparian life-saving equipment. It is proposed that principle of these works be secured via legal agreement, with PLA agreement. Aside from enabling works to be carried out to the towpath, the Applications do not propose any alterations for public access to the towpath. Further details can be found within the submitted Landscape Design and Access Statement, prepared by Gillespies.
- 14.32 These towpath works, along with the development of the Riverside Terrace and general opening up of the Site to enable access to the riverside, is in line with the aims of LBRuT's emerging Local Plan Policy LP 18 which requires all development proposals alongside or adjacent to river corridors to retain and enhance existing public access to the riverside and provide new public access to the riverside and foreshore where possible.
- 14.33 **Works to upgrade the existing public towpath are proposed, which have been agreed in principle with the PLA and would be secured via legal agreement. These works would retain the character of the existing towpath and meet the**

**aspiration of the SBPB. In conjunction with the public realm aspiration to open up connections to the river, the scheme complies with emerging Local Plan Policy LP 18.**

### **Trees**

- 14.34 The NPPF aims to enhance biodiversity and states that planning permission should be refused for development which results in the loss or deterioration of irreplaceable habitats unless the need for, and benefits of, the development in that location clearly outweigh the loss. This reflects London Plan Policy 7.21 which states that trees and woodlands should be protected, maintained and enhanced and any loss of existing trees of value should be replaced in sustainable locations. Wherever appropriate, the planting of additional trees should be included within new development.
- 14.35 LBRuT's DMP (Policy DM DC 4) and emerging Local Plan Policy LP 16 set out that trees and landscape will be protected across the Borough. Where trees are removed as part of new development, appropriate replacement planting will normally be required. There will be a presumption against schemes that result in a significant loss of trees, unless replacements are proposed and there is justification for their loss.
- 14.36 In order to facilitate the comprehensive redevelopment of the Site, some existing trees would need to be removed to enable construction of the new buildings and spaces on Site. The design team has strived to keep disruption to trees to a minimum, and this has influenced the siting and design process. A detailed Arboricultural Survey Report and Impact Assessment has been prepared by Waterman IE and sets out what existing trees will be removed and why their removal is necessary, how retained existing trees would be protected during construction and some details on the new proposed trees. Details are also included within the submitted Landscape Design and Access Statement.
- 14.37 As demonstrated in the Arboricultural Survey and summarised in table 12 below, at this stage, 73 trees are proposed to be removed out of a total of 200 trees, tree groups and hedgerows which have been surveyed (some of which are outside of the red line boundaries) – this equates to 36.5%. The exact number to be removed will be confirmed at detailed design stages. As set out within the Arboricultural Survey

Report and Impact Assessment, the removal of 1 'A' grade tree is due to an unavoidable conflict, and the removal of the 'B' and 'C' grade trees are not considered by Waterman IE to be significant to the general amenity and screening of the Site and adjacent land uses. The majority of trees to be removed are internal trees within the Site and valuable boundary trees would be retained. In addition, up to 163 new trees would be planted across the Site (including at Chalkers Corner), resulting in a net increase of up to 45% cover.

Category (High to low)	Existing	To be removed	To be retained	To be planted
<b>A (highest quality)</b>	13	1	12	n/a
<b>B</b>	96	33*	63	n/a
<b>C</b>	83	32*	51	n/a
<b>U (lowest quality)</b>	8	7	1	n/a
<b>Total</b>	200	73	127	Up to 163

**Table 12: Existing, Removed, Retained and Proposed Trees, treegroups, hedgerows**

**\* One Grade B and one Grade C tree only to be removed in part**

14.38 A tree planting strategy has been included within the submitted Landscape Design and Access Statement. A range of new species would be introduced at the Site, and the species have been selected to respond to their proposed new locations e.g. trees along the streets would be predominately native species with columnar canopies, allowing trees to be situated in close proximity to the building massing and thereby providing shade and shelter from wind and giving seasonal interest in leaves, bark and form. Different tree species would also be selected for their biodiversity and ecological benefits. The tree selection has been informed by LBRuT's greenspace guidance as set out within the Public Space Design Guide (2006). A number of the new trees to be planted would be semi-mature.

14.39 With particular regard to Chalkers Corner, trees have been specifically selected to provide visual screening for nearby residents from the expanded road junction, with

semi-mature trees to be planted (6m high at planting). A total of 33 new trees are proposed at Chalkers Corner (under Application C), a net addition of 11 trees at Chalkers Corner to mitigate against the proposed tree removal. Further detail on the proposed tree planting and greening of Chalkers Corner can be found within the submitted OSPPA, prepared by Gerald Eve and the submitted Landscape Design and Access Statement for Application C (Chalkers Corner), prepared by Gillespies.

**14.40 In order to deliver a comprehensive mixed use development on the Site, some trees would need to be removed. The majority of trees on Site would be retained, and protected during construction. In order to mitigate against tree removal, up to 163 new trees are proposed to be planted across the Stag Brewery site and Chalkers Corner, representing up to a 45% increase in tree cover. The new trees would be a mix of species to respond to their locations and provide ecological and biodiversity benefits, and a number would be planted at semi-mature age.**

## 15 Planning Considerations – Transport, Parking, Construction and Servicing

- 15.1 A comprehensive approach has been taken to traffic, transport and all highway-related matters, and the relevant submission documents have considered the scheme in its entirety, i.e. Applications A, B and C. The impact of the scheme in all relevant highways and transport aspects is acceptable in line with planning and transport policy, and the aims of the SBPB.

### Transport Strategy Overview

- 15.2 One of the key requirements of the SBPB (and reflected, generally, in planning policy at all levels) is that the scheme should deliver the necessary transport and highways works to mitigate any adverse transport and parking impacts on the transport network. The design team and the transport consultants, PBA, have worked together closely throughout the design process to develop a scheme which achieves this aim. Broadly speaking, this has been achieved through two means, set out as follows:

- a) Through highways mitigation measures and a careful approach to car parking / delivery and servicing / construction works; and
- b) Through implementing means which would encourage sustainable modes of travel to and from the Site, thereby reducing impacts on highways.

- 15.3 The overall transport strategy has been developed in close conjunction (and from a very early stage in the process) with LBRuT's highways officers and TfL, as well as with other relevant transport bodies and local groups. In line with the requirements of London Plan Policy 6.3, LBRuT DMP Policy DM TP 2 and emerging Local Plan Policy LP 44, a Transport Assessment has been prepared by PBA which accompanies the planning applications and sets out the transport strategy in full detail. The Applications are supported by a number of other transport related documents including:

- a) The Transport and Access chapter of the ES (chapter 8), prepared by PBA;
- b) A Transport Assessment, prepared by PBA which includes:
  - i. A Framework Delivery and Servicing Plan;
  - ii. Car Park Management Plan;

- iii. Draft Framework Travel Plan;
  - iv. Draft Residential Travel Plan; and
  - v. Draft School Travel Plan.
- c) Operational Waste Management Strategy, prepared by PBA;
  - d) A Framework Construction Management Statement, prepared by AECOM  
;and
  - e) A Site Waste Management Plan, prepared by AECOM.
- 15.4 Collectively, the assessments and documents set out in paragraph 15.3 above address all key material considerations relating to transport and highways matters, for all stages of the proposed development.
- 15.5 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable (paragraph 34). Mixed use schemes are encouraged where these can assist in minimising journey lengths (paragraphs 37 and 38).
- 15.6 The London Plan also prioritises sustainable transport methods and encourages development to be located in sustainable locations to help reduce vehicle trips. Development should provide effective public transport, including solutions to encouraging walking and cycling (London Plan Policy 6.1). LBRuT policy echoes these aspirations (Core Strategy Policy CP 5), and also requires that development should not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks (emerging Local Plan Policy LP 44).
- 15.7 These policy aspirations towards a more sustainable transport system have formed the basis of the overall transport and highways approach for the Stag Brewery Site. This section assesses the impact of the scheme upon highways; parking; sustainable travel; delivery; servicing and waste; and construction.

### **Highway Impacts**

- 15.8 As set out within the Transport Assessment, when the brewery was operational, a number of daily trips were made in association with the brewery use. The proposed development would result in an increase in the number of vehicle trips to and from

the Site, and these are presented within the Transport Assessment.

- 15.9 London Plan Policy 6.3 states that development proposals should not adversely affect safety on the transport network. The supporting policy text notes that development cannot place an unacceptable burden on either the public transport network and/or the road network. Where significant new trips are expected, the transport networks should have capacity to meet the additional demand.
- 15.10 A number of highways works are proposed to mitigate the development's impact on the local highway network. These works include the following:
- a) Works to Chalkers Corner junction including the realignment and localised widening of the Lower Richmond Road Arm, to improve the flow of traffic into the junction from Lower Richmond Road so as to reduce current delays;
  - b) Works to Mortlake High Street, including moving bus stands and introducing a new crossing point, narrowing of traffic lanes and introducing measures to help manage the speed of traffic and to give greater priority to pedestrians and cyclists (including introducing a 20mph zone, details of which would be agreed post determination);
  - c) Works at the mini roundabout between Mortlake High Street, Lower Richmond Road and Sheen Lane, introducing measures to increase capacity for vehicles west to east; and
  - d) Re-locating existing bus stops to better suit pedestrian movements, introducing a new bus stop clearway and removing a bus stop.
- 15.11 The works proposed to Chalkers Corner are the subject of Application C. All other necessary highway works affecting adopted highway land (aside from those affecting Williams Lane and Ship Lane, which are within the red line boundary) would be delivered via a section 278 agreement, secured in the section 106 legal agreement associated with any planning permission for Applications A and B.
- 15.12 **The proposed development includes appropriate highways and transport measures to mitigate the impacts of the development on the local highway network and to prioritise the movement of pedestrians and cycles between the site and Mortlake Station. This is in accordance with strategic transport planning principles.**



## **Parking**

### *Car Parking*

- 15.13 It is proposed to provide car parking for the proposed development at basement level, with a small number of spaces for the school and the townhouses provided at grade. Two basement car parks would be provided – one to the east of Ship Lane within Development Area 1 and one to the west of Ship Lane within Development Area 2. Further detail on the proposed car park access and layout can be found in the submitted Design and Access Statement and Transport Assessment (Parking Management Plan).
- 15.14 The London Plan seeks to strike a balance between promoting new development and providing excessive parking that can undermine the strategic sustainable transport priorities set out in Policy 6.1 (Policy 6.13). Provision should be made for electric vehicle parking, disabled parking and for delivery and servicing.
- 15.15 The London Plan sets out maximum parking standards at table 6.2 and for the Site (PTAL 2, Urban, 200-450 hr/ha, 55-145 u/ha), the maximum parking standard is up to 1.5 spaces per unit. These standards conflict with LBRuT's parking standards as set out within Appendix 4 of LBRuT's DMP and Appendix 3 of the emerging Local Plan, which seek to provide higher levels of car parking within the Borough. Associated policies DM TP 8 and emerging Local Plan Policy LP 45 require developments to provide adequate parking to meet the needs of the development. Unacceptable impacts on on-street parking and local traffic conditions should be avoided.

15.16 Table 13 sets out the location and number of car parking spaces by use.

Use	Total Car Parking Spaces	Location of Car Parking Spaces
Residential (Development Area 1)	331	Basement level within Development Area 1, accessed from Ship Lane (east) and Mortlake High Street
Non-residential uses (Development Area 1)	77	Basement level within Development Area 1, accessed from Ship Lane (east) and Mortlake High Street
Residential (Development Area 2)	225 plus 24 spaces for townhouses	<p>Basement level within Development Area 2, the majority is accessed from Ship Lane (west), with parking for the townhouses (blocks 20 and 21) provided at grade</p> <p>These parking spaces would cater for the up to 150 flexible assisted living / residential units within blocks 13, 16 and 17, with details confirmed in due course via Reserved Matters submissions</p>
Care Home	31	Basement level within Development Area 2, accessed from Ship Lane (west)
School	15	At grade directly outside the school entrance, accessed from the new access road via Lower Richmond Road
<b>Total</b>	<b>703</b>	

**Table 13: Proposed Car Parking Numbers and Location by Use**

15.17 The level of car parking proposed has been discussed extensively with TfL, LBRuT and local community groups. The Applicant has sought to achieve a balance between providing sufficient car parking to meet the needs of the development,

whilst not providing excessive car parking which could increase traffic congestion in the local area. For residential uses, the overall parking ratio is approximately 0.72 parking spaces per unit, but this is on the assumption that the (up to) 150 units in blocks 13, 16 and 17 come forward as residential (and not assisted living units). This is below LBRuT's parking standards but in accordance with the GLA's parking standards. As set out within the Transport Assessment, the development proposals would provide a mix of local facilities, the Site has access to public transport connections (some of which would be improved through the development) and measures would be implemented to reduce car usage. Therefore, on balance, the proposed parking numbers would provide for the needs of the development, in line with LBRuT emerging Local Plan Policy LP 45.

- 15.18 Disabled ('Blue Badge') parking and electric vehicle charging points would be provided, in accordance with London Plan, DMP and emerging Local Plan policy requirements.
- 15.19 With respect to existing on-street parking, the necessary highways works would result in the net loss of 11 on-street car parking spaces. This is due to the provision of new pedestrian crossings (including to allow safe access to the school), improvements to bus stops/stands, new highway access points and the revised layouts along both Williams Lane and Ship Lane. The Transport Assessment concludes that this loss would have a minimal impact on the existing parking situation, reducing overall overnight capacity of on-street parking bays to 17%, from 19%.
- 15.20 The Transport Assessment concludes that the impact of the proposed development on local on-street parking is acceptable. Notwithstanding this, the introduction of a Controlled Parking Zone ('CPZ') would have additional benefits for the local area, although the introduction of a CPZ is not necessary to make the development acceptable in transport terms. As set out in the Transport Assessment, inclusion of a CPZ would help to alleviate any parking stress that the development may generate, which is largely as a result of the new school.
- 15.21 Whilst a CPZ would be desirable, it is not essential. Introducing a new CPZ would be subject to a separate consultation process which would be led by LBRuT and therefore whilst funding could be secured, it cannot be guaranteed that one would

be provided as part of the proposed development.

- 15.22 **A balanced approach has been taken toward the provision of on-site parking. The proposed development aims to provide sufficient parking to accommodate the day to day requirements of the development without providing an oversupply which would promote increased traffic generation. This is in accordance with London Plan Policy 6.13 and LBRuT policies DMP Policy DM TP 8 and emerging Local Plan Policy LP 44.**

#### *Cycle Parking*

- 15.23 Both the London Plan and LBRuT's transport planning policies require development to provide cycling facilities. London Plan Policy 6.9 states that these must be secure, integrated and accessible and that on-site changing facilities and showers should also be provided. LBRuT also require adequate cycle parking (DMP Policy DM TP 7 and emerging Local Plan LP 44) and the emerging Local Plan adopts the same cycling parking standards as set out in Table 13.1 of the London Plan. The scheme provides cycling facilities throughout, in line with the London Plan standards.
- 15.24 Development Area 1 would provide a total of 981 cycle parking spaces for the residential and non-residential uses. Parking will be provided within secure locations within the basement and designed in accordance with the principles as set out in the London Cycling Design Standards. A cycle hub would be provided which will provide shower and changing facilities. 5% of the cycle parking would accommodate non-standard bikes. The majority of cycle parking within Development Area 2 would also be provided at basement level but short stay provision and provision for non-standard bikes would be provided at ground level. For the school (Application B), a total of 84 cycle parking spaces would be provided.

#### *Taxi Parking*

- 15.25 There is no specific taxi parking provided within the development. It is anticipated that taxis would drop off and pick up on street as with other residential areas. Subject to provisions of a detailed Framework Delivery and Servicing Management Plan, taxis may be allowed into the 'High Street' area of the development, for

example to access the hotel or drop disabled people off within the site.

### *Coach Parking*

- 15.26 In line with LBRuT DMP Appendix 4 and emerging Local Plan Appendix 3, provision has been made for parking coaches associated with the new school. Two service bays are shown on the new school access road – these could be used by service vehicles, coaches and potentially TfL special school buses serving the school, should these be required.
- 15.27 **The proposed development will provide adequate cycle, taxi and coach parking for the proposed mix of uses on Site.**

### **Sustainable Transport Initiatives**

- 15.28 In line with national (NPPF paragraph 34), London Plan (Policy 6.1) and local strategic planning objectives (Core Strategy Policy CP5, DMP Policy DM TP 1 and emerging Local Plan Policy LP44), the scheme seeks to maximise opportunities to support and encourage sustainable transport modes. These opportunities include encouraging cyclists and pedestrians and public transport.

### *Buses*

- 15.29 PBA have carried out extensive consultation with TfL and LBRuT regarding how the Site would be accessed by buses, and how the additional trips generated from the new school and other land uses would impact on existing bus capacity.
- 15.30 It has been agreed by all parties that the scheme would generate demand for additional bus capacity, and this has been factored into the wider trip generation assessment for the development. The greatest driver for additional bus demand is the new secondary school; the other land uses generate only a modest increase on bus demand.
- 15.31 Currently, TfL's wider plans for bus routes and capacity in the local area are under review and would not be confirmed until more clarity has been provided on the Hammersmith Bridge works. Therefore, a worst-case scenario has been generated

and a financial contribution would be secured from the Applicant/school provider which would support enhanced capacity for local buses.

- 15.32 Due to the uncertainty surrounding exactly how this additional capacity would be delivered, TfL has requested that an area of land be secured within the Applications which could provide a bus turnaround facility. The need for a bus turnaround facility is not necessarily generated by the development itself – TfL has confirmed that this would likely provide benefits for the wider local area, with the need arising from the development itself and increased capacity requirements in the local area. The Applications do not seek permission for a bus turnaround – this is shown only indicatively on the plans and would not be able to be delivered without a separate application and consultation process. This approach enables flexibility should such a facility be required – at that time, discussions can progress between TfL and LBRuT and if deemed appropriate, the relevant planning application brought forward.
- 15.33 The scheme also proposes the re-location of bus stops and bus stands around the Site to allow for new access points and crossings. Where amendments are proposed to existing bus infrastructure, care has been taken to ensure safe and effective interchanges with other road users, including pedestrians and cyclists, in line with DMP Policy DM TP 4.
- 15.34 **The scheme would accommodate for additional bus capacity via financial contributions. This would enable school children, residents, visitors and employees to travel to and from the site via bus, thereby encouraging more sustainable modes of travel. Land for a bus turnaround would also be safeguarded, should TfL and LBRuT seek to bring this forward in due course via a separate application and consultation process.**

#### *Rail*

- 15.35 PBA's Transport Assessment considers the impact of the proposed development upon rail services into and out of Mortlake rail station. Assumptions have been made on the additional trips expected as a result of the development and in the light of South Western Railway's programme to increase capacity. The Assessment indicates that there is sufficient capacity for both the existing and forecasted future

passenger numbers in terms of station infrastructure and train capacity.

- 15.36 **The submitted Transport Assessment indicates that there is sufficient rail capacity and station infrastructure capacity for existing and forecasted future passenger numbers.**

*Pedestrian and Cycling Connections*

- 15.37 The scheme would result in an increase in pedestrian and cyclist numbers, both from visitors and new residents. Enabling effective pedestrian and cycle routes to and through the Site has been a key design aspiration, in line with London Plan Policies 6.9 and 6.10 and LBRuT DMP Policies DM TP 3, DM TP 6 and DM TP 7.

- 15.38 As set out within the submitted Transport Assessment, highways works and new pedestrian crossings would facilitate improved pedestrian and cycle access to and from the Site, in line with DMP Policy DM TP 3. The submitted Landscape Design and Access Statement, prepared by Gillespies, sets out how the landscaping design approach has sought to maximise pedestrian access and circulation and encourage cycling. Enabling positive public connections and opening up the Site for public access has been a key aim of the masterplan – in particular, the scheme would deliver a large new green link from Mortlake Green to the riverside, and riverside access would be increased, with the provision of new public spaces and pedestrian routes. Streets, paths and open spaces have been designed to provide safe pedestrian access and cyclist access, where relevant.

- 15.39 With respect to the level crossing on Sheen Lane, PBA have carried out a detailed assessment of how the additional pedestrian trips generated by the development would impact on the crossing's capacity. It is concluded that even with the additional forecasted trips, there will only be a modest impact upon the level crossing. In particular, the footbridge appears to have sufficient capacity to accommodate additional demand, and the width of the pedestrian crossings appear sufficient to meet guidelines both now and in the future with the additional trips generated by the development. Notwithstanding this, the Transport Assessment does set out a series of recommendations for how the level crossing and station infrastructure could be improved. These would need to be delivered by Network Rail and other landowners as appropriate. These would not need to be delivered as part of the Stag Brewery

masterplan as no need for these works is generated.

### *Travel Plans*

- 15.40 Draft Travel Plans have been prepared by PBA and are included in the Application submissions in accordance with TfL guidance. Separate Travel Plans are provided for various elements of the proposal including a Framework Travel Plan for the whole Site (excluding the school), a Residential Travel Plan and a separate Travel Plan for the school.
- 15.41 The Travel Plans set out objectives and targets for the Site occupiers to make use of sustainable travel modes. Building upon these objectives, the Plans set out how these will be delivered, with measures, action plans and how the Plan objectives would be monitored and reviewed. It is envisaged that the Travel Plans would be secured through the Section 106 Agreement and that this would secure funding to include initial implementation, on-going monitoring and review and any additional measures that might be required as a result of this process.

### *Car Club*

- 15.42 Both the London Plan (Policy 6.11) and LBRuT's planning policies (Core Strategy Policy CP5, DMP (paragraph 5.4.31) and emerging Local Plan (paragraph 11.2.5)) recognise the role that car share facilities and car clubs can have in reducing vehicle trips and therefore minimising the impact of car based travel on local highway networks and the environment.
- 15.43 It is anticipated that Car Club spaces could be provided on Ship Lane.
- 15.44 **A range of sustainable travel initiatives are proposed which would help in achieving the strategic transport aims of the NPPF and the London Plan. Travel Plans would be secured and funded to assist in maximising sustainable travel opportunities across the Site.**

### **Waste and Servicing**

- 15.45 The London Plan requires suitable waste and recycling storage facilities in all



developments and seeks to minimise waste and improve commercial recycling/composting levels. (Policies 5.16 and 5.17)

15.46 LBRuT supports the objectives of sustainable waste management and seeks to maximise self-sufficiency in waste management and minimise waste creation (Core Strategy Policy CP 6). Emerging Local Plan Policy LP 24 states that waste should be managed in accordance with the waste hierarchy – reduce, reuse or recycle waste as close as possible to where it is produced. LBRuT’s ‘Refuse and Recycling Storage Requirements’ SPD (2015) sets out detailed guidance and requirement for waste management.

15.47 The strategy for operational waste management has been developed in accordance with these policies and guidance and is set out within the submitted Operational Waste Management Strategy, prepared by PBA and included as an appendix within the Transport Assessment. The Strategy sets out estimated waste volumes for the detailed elements of the scheme (i.e. Application A – Development Area 1 and Application B – the school). As the exact unit numbers and mix are not yet confirmed for the outline elements of the scheme (Application A – Development Area 2), assumptions have been made to set out an estimate. The Strategy sets out how waste would be dealt with on Site – in summary, space would be provided for refuse and recyclable and non-recyclable waste would be stored separately. The details of waste storage for the outline elements are not yet known and would be secured through future applications, but appropriate waste storage would be provided. Waste would be collected off-street, in line with LBRuT refuse guidelines.

15.48 In terms of servicing, emerging Local Plan Policy LP 45 states that major new development which involves freight movements and has servicing needs must demonstrate that it has no severe impacts on the road network or cause harm to surrounding residents.

15.49 A Framework Delivery and Servicing Management Plan has been prepared by PBA and is appended to the Transport Assessment. As with the waste strategy, detailed strategies have been set out for Application A – Development Area 1 and the school (Application B). The strategy for those elements in detail (Application A – Development Area 2) has been set out at a high level, but the details would be confirmed in due course via future submissions. The Management Plan sets out that

wherever feasible, delivery and servicing trips would be minimised. For the uses to the east of Ship Lane (Development Area 1), deliveries would try to be co-ordinated, to minimise vehicular trips and vehicular disruption. Adequate servicing space has been designed into the detailed elements of the scheme to accommodate the necessary delivery and servicing vehicles.

- 15.50 **Adequate refuse storage and servicing space has been designed into the detailed elements of the scheme (Application A – Development Area 1 and the school (Application B)). The outline element (Application A – Development Area 2) would also provide adequate space, with details to be secured via future submissions. The strategy for waste and servicing has been to minimise vehicular trips and impact on the local highway network, in line with relevant policies and guidance.**

## **Construction**

### *Site Wide Construction*

- 15.51 As set out in Section 4 of this Town Planning Statement, the development would be carried out in phases. Due to the extent and nature of works, construction traffic has been carefully considered by the project team and a Framework Construction Management Statement, prepared by Aecom has been prepared which responds to the requirements of LBRuT emerging Local Plan Policy LP 10. It provides details of how the construction process would be managed to protect neighbour amenity and local transport networks.
- 15.52 The Framework Construction Management Statement sets out measures for how the impact of construction vehicle trips to and from the Site can be reduced. It is proposed that a detailed Construction Environmental Management Plan would be prepared post-determination of the Applications and secured through planning condition – this would be based on the high level information provided within the submitted Framework Construction Method Statement and would detail relevant environmental management controls necessary for environmental protection during construction.
- 15.53 Chapter 8 of the submitted ES sets out the transport impacts of construction waste

and trips on the local highway network. It concludes that the impact of the construction works would be insignificant.

15.54 Both the London Plan (Policies 5.18 and 6.14) and LBRuT's emerging Local Plan (Policies LP 24 and LP 44) encourage the use of the River Thames where relevant for freight. The project team has carefully considered the possibility of using the river for construction waste during the construction period. However, a number of significant constraints have been identified in respect of river use, including the highly tidal nature of the river in this location, the significant use of the river in this location (rowing clubs and leisure users) and the poor quality and condition of the wharf and river wall. Further details are included within the Framework Construction Management Statement, prepared by AECOM and chapter 4 of the ES, prepared by Waterman IE.

*Interim Works – Application B (School)*

15.55 As well as the co-ordinated plans for the whole of the Site, given the flexibility to bring forward the school or the mixed use scheme independently, interim plans have been prepared which set out the physical works associated with the interim state for bringing forward either the school (Application B) or the mixed use scheme (Application A) on its own.

15.56 Plans have been submitted in support of Application B which detail the interim works. Reserved Matters associated with the outline elements of Application A would include permanent works to supersede any approved / implemented interim works on the school site. Further details can be found within the submitted Transport Assessment and the Application B Design and Access Statement.

15.57 **Documents have been prepared which set out how the construction of the works would be carried out, and how vehicular trips and construction methods would be managed to protect neighbour amenity and the local highway network. It is proposed that further detailed construction plans would be controlled via condition.**

## 16 Planning Considerations – Heritage and Townscape

### Above Ground Heritage

#### *Legislative Background and Policy*

- 16.1 The statutory requirements for planning applications which affect statutorily designated heritage assets, including listed buildings and conservation areas, or their setting, seek to ensure that special regard is given to the desirability of preserving the asset or its setting, character, appearance or any features of historic interest which it possesses (Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990).
- 16.2 The Government attaches great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposal would cause to the significance of the heritage asset. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm shall be weighed against the public benefits of the proposals (NPPF paragraphs 132, 133 and 134).
- 16.3 In addition to the NPPF, further supplementary guidance on conserving and enhancing the historic environment is provided in the PPG. Paragraph 9 states that the ‘significance’ of a heritage asset and the contribution of its settings, is very important to understanding the potential impact and acceptability of proposals.
- 16.4 The London Plan encourages development to identify and make use of heritage assets. Development affecting heritage assets and their settings should conserve their significance. The significance of heritage assets should be assessed and schemes designed to recognise and preserve heritage significance and wherever possible, heritage assets should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and other principles in the Plan (London Plan Policies 7.8 and 7.9).
- 16.5 LBRuT’s planning policies also seek to conserve and protect designated heritage

assets and set out that development should take opportunities to make a positive contribution to the historic environment (Core Strategy Policy CP7, emerging Local Plan Policy LP3) and specifically in relation to the River Thames corridor, development should protect the unique historic landscape (Core Strategy Policy CP11).

- 16.6 LBRuT policy states that proposals must protect and enhance the setting of listed buildings and Conservation Areas, and that substantial demolition will be resisted in Conservation Areas unless the building makes no contribution to the area or if the harm can be outweighed by public benefits (Development Management Policies DM HD1, HD2 and emerging Local Plan Policy LP3). LBRuT's locally listed buildings are called 'Buildings of Townscape Merit' ('BTM') and Development Management Policy DM HD 3 and emerging Local Plan Policy LP4 set out that the Council will seek to protect, and where possible, enhance the significance, character and setting of BTMs. Generally there will be a presumption against the loss of BTMs and any works affecting the buildings or their setting should assess the impact of the works upon the significance of the building.

*Site Context*

- 16.7 In light of the above legislative and policy summary, the heritage context for the Site is as follows:
- a) *Conservation Areas:* Partly within the Mortlake Conservation Area and directly opposite the Mortlake Green Conservation Area.
  - b) *Listed Buildings:* There are no listed buildings on the Site but there are a number of Grade II listed buildings along the Thames Bank, as well as a Grade II listed gateway on Williams Lane and the Garden Wall to the east of Number 1 to 8 Riverside House and extending behind Numbers 1 to 24 Reid Court is Grade II listed. The Grade II Chiswick Bridge is also located within the vicinity of the Site.
  - c) *BTMs:* Three BTMs are located on the Site (the Maltings Building, the Former Bottling Building and Former Hotel Building) which are identified in the SBPB as contributing in varying degrees to the Mortlake Conservation Area (paragraph 2.10). There are also a number of BTMs located close to the site (including the Ship Public House and a number along the Thames

Bank, the Jolly Gardeners Public House and a number along the Lower Richmond Road).

- d) *Other non-designated heritage assets:* There are some non-designated heritage assets on the Site which comprise the northern, eastern and southern boundary walls, railway tracks, granite paving and river moorings, memorials and historic gates.

16.8 The submitted Built Heritage Statement, appended to chapter 15 of the ES, prepared by Waterman IE, sets out the history of the Site. The Built Heritage ES chapter assesses the significance of designated and non-designated heritage assets on and near to the Site, on a scale of significance, and then assesses the impact of the proposed development on these heritage assets. This impact is summarised below.

16.9 The Built Heritage Statement sets out that the majority of the historic brewery on the Site was demolished in the latter half of the twentieth century, leaving only three intact structures and boundary walls. These buildings have value in their own right and are the main contributing factor to the Site's heritage significance and its contribution to the setting of other nearby heritage assets. The Statement concludes that twentieth century development has had a considerable negative effect on the heritage significance.

*Listed Buildings (Designated heritage assets)*

16.10 Chapter 15 of the ES assesses the impact of the proposed development upon the listed buildings along the Thames Bank, the listed gateway and Chiswick Bridge. It is concluded that the existing modern brewery structures on Site detract from the appreciation of the heritage assets.

16.11 With regard to the proposed development, the Built Heritage Statement concludes that the proposed works would be an enhancement when compared to the existing situation, and that the design of the new built form would complement the appreciation of the heritage assets and the existing green space on Site. The proposed development would also be in keeping with the scale of development that would have existed historically along the riverfront.

16.12 **With regard to Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is concluded that architectural and historic interest of the listed buildings would be preserved and enhanced. The proposed works will enhance the setting of nearby listed buildings through the removal of the majority of the existing brewery buildings and the design and scale of the new built form. This complies with LBRuT Core Strategy Policy CP7, DMP Policy DM HD 2 and emerging Local Plan Policy LP 3.**

*Conservation Areas (Designated heritage assets)*

16.13 The Built Heritage Statement concludes that the surviving elements of the historic brewery on the Site make a positive contribution to the Mortlake Conservation Area. The remainder of the Site is not considered by Waterman IE to contribute and the modern brewery structures within it detract from the appreciation, character and appearance of the Conservation Area. Therefore, the proposed works would be an enhancement when compared to the existing situation and that they would not compromise the Conservation Area's relationship with the positive elements of its setting.

16.14 With respect to the Mortlake Green Conservation Area, the Statement sets out that the Site is not considered to contribute to the particular significance of the Conservation Area and that the modern structures detract from the appreciation of the area. Some elements, such as the Former Hotel Building and the sports ground do complement the character and appearance of the Conservation Area. Waterman IE conclude that the positive elements of the Conservation Area's setting would be sustained, and that the high-quality architecture of the proposed new development would complement the appreciation of views across the Green.

16.15 **With regard to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is concluded that the character and appearance of the Mortlake Conservation Area and Mortlake Green Conservation Area would be preserved and enhanced. A number of existing structures on Site, which are considered to detract from the appreciation of the Conservation Areas, would be removed and new high-quality architecture would be brought forward. This complies with LBRuT Core Strategy Policy CP7, DMP Policy DM HD 1 and**

**emerging Local Plan Policy LP 3.**

*Buildings of Townscape Merit (Non-designated heritage assets)*

- 16.16 The Built Heritage Statement sets out that the main points of interest for the Former Hotel Building and Former Bottling Building are their façades. The Former Hotel Building's curved façade provides a townscape role in defining the street corner and historically would have formed a prominent entrance into the brewery site. The Former Bottling Building is identified within the Mortlake Village Planning Guidance as having local historical and architectural importance mainly due to its façade. Internally, both buildings have been altered but there are still some original elements remaining.
- 16.17 It is proposed to demolish the Former Bottling Building and Former Hotel behind retained principal facades (fronting Mortlake High Street and Lower Richmond Road). Two new buildings would be constructed behind, which would accommodate a gym, flexible use space, offices, a hotel and residential units. The hotel use would be created within the Former Hotel Building, which, as set out within the submitted ES, would enhance the understanding and appreciation of the building's heritage value through re-introduction of the building's former use. This would better reveal the building's significance in comparison to the existing situation.
- 16.18 As identified within the SBPB, the Maltings Building is an important local landmark (paragraph 2.12) which contributes to the significance of the Conservation Area. The surviving structure represents only part of the building originally constructed and the eastern elevation has been re-built following demolition of kilns and malting bins that were located on the eastern side of the structure. Internally, the floors are no longer present but some of the internal structure remains. Externally, the Built Heritage Statement concludes that the building retains its historic character and industrial appearance and features that contribute to its evidential and aesthetic values.
- 16.19 It is proposed to retain the Maltings building in its entirety, although significant works are proposed to the interior space, largely to bring the building back into use. The building will be converted into residential apartments with ground floor flexible use space. Externally, works will include replacing existing windows, insertion of new windows in existing blind openings and the elongation of several windows on the



north, east and west elevations. A new large glazed opening is proposed on the eastern elevation which will help enable the flexible use space to activate the new Maltings Plaza. Whilst the industrial use of the building will not be continued, some external features which are associated with the industrial character of the building would be retained. This would help to maintain an understanding of its former use.

16.20 Overall, the Heritage Statement concludes that the permanent works to the building would have a direct, permanent, local, adverse effect of minor significance on the heritage significance of the building. The conversion of the Former Bottling Building, Former Hotel and the Maltings would have an insignificant to direct, long-term, local, adverse effect of minor significance.

16.21 The Built Heritage Statement has also considered the impact of the proposed works on the Jolly Gardeners Public House, a designated BTM (albeit not within the Site boundary). The Statement concludes that the proposed development would be an improvement to the existing situation, would complement the appreciation of the heritage asset and would retain the relationship between the building and Mortlake Green.

*Other non-designated heritage assets*

16.22 The Built Heritage Statement assesses the significance of the existing boundary walls and concludes that some sections are of neutral heritage significance with the majority of the retained walls to be considered of low heritage significance. This is partly due to the fact that the walls provide evidence of historic structures that previously existed on the Site, with blind windows indicating the former locations of these buildings.

16.23 It is proposed to demolish the majority of the boundary walls and retain a section within the north east corner of the Site. The Built Heritage Statement concludes that the demolition of the walls would have an adverse effect on the heritage significance but the retention of a small section of wall would allow an understanding of the former function and industrial history of the Site. Removing some of the boundary walls is considered acceptable by the SBPB which recognises that the walls currently create a physical barrier to the Site. Retaining these boundary walls would not enable the Site to be opened up and create meaningful and useful links through

to Mortlake Village, the Green and the River.

- 16.24 The Site includes some sections of surviving historic railway tracks, granite paving setts and timber river moorings. These elements assist in an enhanced understanding of the former use of the Site and the link between the former Stag Brewery and the River Thames. It is proposed to retain these features in-situ. The proposed works would therefore have an insignificant effect on the heritage significance of these elements.
- 16.25 The existing memorial plaques and gates are also considered to be significant. These elements will be retained within the proposed development albeit, re-located. As none of these elements exist within their original context, it is considered that their re-location would not compromise their heritage value.
- 16.26 **The effect of the proposed development upon the un-designated heritage assets has been considered. The heritage chapter of the ES (chapter 15) concludes that the Proposed Works would have beneficial, insignificant and minor adverse effects on the assets. The works would retain the principle façades of the Former Bottling Building and Former Hotel, the Maltings Building, a section of the boundary wall and other non-designated heritage assets. The retention of these elements helps to understand the history of the Site and enhances the proposed works. This is in accordance with LBRuT Core Strategy Policy CP7, DMP Policy DM HD 3 and emerging Local Plan Policy LP 4.**
- 16.27 **With respect to the NPPF tests, overall it is concluded that there is no material harm to the setting of designated heritage assets. Therefore, the proposed development is in compliance with the policies of the NPPF.**

### **Townscape and Views**

- 16.28 London Plan Policy 7.11 designates a number of strategic views, which are described in more detail in the London View Management Framework SPG. The Site is not within any of these designated views.
- 16.29 LBRuT's DMP seeks to protect locally designated views (DM HD 7) and the

emerging Local Plan seeks to protect the quality of views, vistas, gaps and the skyline which contribute significantly to the character, distinctiveness and quality of the local and wider area (draft Policy LP 5). The Site within designated local views and the Maltings Building is identified as a landmark within the Mortlake Village Planning Guidance SPD. Though not recognised specifically, the former Stag Brewery site also forms the backdrop to the finishing line of the annual Oxford and Cambridge University Boat Race, therefore the Site has a key cultural interest within the townscape and visual amenity context.

16.30 The submitted ES includes an assessment of Townscape and Visual Effects (Chapter 16), prepared by Waterman IE assesses the likely significant effects of proposed development on the local townscape character and visual amenity during the works and once the development is completed and operational.

16.31 The townscape assessment considers impacts on the townscape area boundaries as defined within the Mortlake Village Planning Guidance (2015). The townscape assessment considers the existing character of these areas, and how the proposed development will impact. The assessment concludes that the completed development will have moderate to substantial significant beneficial effects on the Mortlake and Stag Brewery character areas, with effects on the other character areas ranging from insignificant to minor beneficial effects. With respect to the ‘Stag Brewery’ character area, where substantial townscape effects will be felt, the assessment states that the proposed development would not clear or impact on any positive features of the area but will open up the Site, introduce new public spaces, retain key buildings and structures of historical and architectural importance, and introduce modern structures which would fit well with the existing pattern of the townscape.

16.32 The visual amenity assessment has been based on an extensive range of townscape views, locations of which have been agreed following consultation with LBRuT. Of the 12 viewpoints, the majority will be beneficially affected by the proposed development, two will have insignificant impacts and only one viewpoint would experience effects of minor adverse significance. These adverse effects would only affect two of the three visual receptors of this view (Road users of Thames Bank and Recreational users of the Thames Path National Trail). Road users’ views would be in transit and users of the Thames Path would experience the

addition of further buildings where gaps at the riverside would be intruded on. Waterman IE concludes that this change would be evident but not especially prominent and essentially localised within the wider view.

- 16.33 An assessment of the impacts of the proposed development upon Townscape and Visual Effects has been undertaken. Any effects on local townscape character areas from the completed development are deemed to be insignificant or beneficial. The majority of impact from the completed development on local visual amenity is considered to be beneficial, with only two receptors experiencing adverse impacts. The scheme design and introduction of new open and green spaces is considered to be beneficial in townscape terms. The development therefore complies with LBRuT DMP Policy DM HD 7 and emerging Local Plan Policy LP 5.**

### **Archaeology**

- 16.34 The London Plan seeks to ensure that development incorporates measures which identify, record, protect and where appropriate present a site's archaeology (Policy 7.8).
- 16.35 Both existing and emerging LBRuT policy seek to protect, enhance and promote archaeological heritage and encourages its interpretation and presentation to the public (DMP Policy DM HD 4 and emerging Local Plan Policy LP 7).
- 16.36 In order to assess the potential impact of the proposed development upon archaeology (buried development), an assessment has been undertaken by CgMs as part of the ES (Chapter 14). The assessment is supported by a below ground Desk Based Archaeological Assessment as well as archaeological evaluation and monitoring fieldwork.
- 16.37 The Stag Brewery Site lies within the Mortlake and Barnes Archaeological Priority Area ('APA') and the northern boundary of the Site abuts the Thames Foreshore and Bank APA. The Assessment considers the baseline existing archaeological conditions and identifies a low archaeological potential for the roman and early-medieval periods, a moderate potential for the pre-historic period and a high

potential for the medieval and post-medieval periods.

- 16.38 The assessment considers the impact of below ground works (i.e. basement construction) on archaeological deposits. Effects from building the basements have been identified and therefore mitigation measures are proposed which include the implementation of a phased archaeological evaluation programme and implementation of further excavation work dependent on the results of the evaluation programme. This strategy has been discussed and agreed with GLAAS during pre-application discussions.
- 16.39 **An Archaeological Assessment has been carried out as part of the ES (chapter 14) and assesses the impact of proposed below ground works on existing buried heritage. Where effects are identified, mitigation measures are proposed so that the likely residual effects are deemed insignificant. These mitigation measures have been agreed with GLAAS. The scheme is therefore in compliance with planning policy requirements to identify and protect archaeological heritage.**

## 17 Planning Considerations – Energy and Sustainability

**The scheme has incorporated energy efficient measures to reduce carbon emissions, as well as a range of other sustainability measures. The proposed development is in accordance with relevant planning policy and guidance, in particular, the core principles of the NPPF surrounding energy consumption, London Plan Policy 5.1 and LBRuT Core Strategy Policies CP1, CP2 and CP3 and emerging Local Plan Policy LP 20.**

- 17.1 The Applications are accompanied by an Energy Strategy and a Sustainability Statement, along with a completed Sustainable Construction Checklist (appended to the Sustainability Statement), all prepared by Hoare Lea. The development of this strategy follows pre-application discussions with GLA energy officers.
- 17.2 Given the comprehensive design approach taken to the whole Site, the Energy Strategy assesses the mixed use development (Application A) as well as the school (Application B). Works at Chalkers Corner do not raise any requirements in respect of energy matters but will, however, affect other sustainability criteria such as air quality and have therefore been assessed and included within the Sustainability Statement.

### **Carbon Savings and Energy Efficiency**

- 17.3 The NPPF is clear that local authorities should support the move towards a low carbon future (paragraph 95) by planning for new development in locations that reduce greenhouse gas emissions, support energy efficiency improvements and set requirements for sustainable buildings.
- 17.4 One of the key points within the Mayor's vision for sustainable development is that climate change should be addressed through adapting new and existing environments to better respond and through mitigation through reducing emissions and deliver energy efficient development (London Plan, paragraph 1.48). This aim is supported by Policy 5.1 which states that the Mayor will seek to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following

energy hierarchy:

- a) Be Lean: Use Less Energy
- b) Be Clean: Supply Energy Efficiently
- c) Be Green: Use Renewable Energy

- 17.5 Furthermore, Policy 5.2 sets out targets carbon dioxide emissions reduction in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019.
- 17.6 Developments should be designed and constructed to adopt sustainable methods which will assist in delivering buildings with adapt to and mitigate the effects of climate change (Policy 5.3).
- 17.7 In relation to decentralised energy networks, London Plan Policy 5.5 states that the Mayor expects 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Policy 5.6 states that development proposals should evaluate the feasibility of using Combined Heat and Power systems ('CHP'), and where they are appropriate consider opportunities to extend the system beyond the site boundary.
- 17.8 The London Plan also requires all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions and that on-site carbon dioxide emission reductions will be provided through the use of on-site renewable energy generation where feasible, including green infrastructure including roofs and walls (London Plan Policies 5.7, 5.9, 5.10 and 5.11).
- 17.9 In support of the policies of the London Plan, the Mayor's SPG on Sustainable Design and Construction (2014) provides the context for all developments and provides a mechanism for addressing climate change impacts through new developments.
- 17.10 At a local level, LBRuT's planning policies reflect the strategic objectives of the

NPPF and the London Plan. (Core Strategy Policies CP1, CP2, CP3, DMP Policies DM SD 1, DM SD 2, DM SD 4, DM SD 5 and emerging Local Plan Policy LP 20 and LP 22). Efficient use of land and resources is promoted, as are measures to reduce the environmental impact of development. In particular, Policy CP 2 requires all new development to achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy unless it can be demonstrated that such provision is not feasible. Developments should be designed to meet the need for cooling and adopt a cooling hierarchy to reduce reliance on air conditioning equipment.

17.11 The submitted Energy Strategy sets out how the scheme will respond to the Mayor's energy hierarchy, as summarised below:

- a) **Be Lean (Use Less Energy)** – A selection of passive design and energy efficient measures, such as insulation, optimising glazing ratios and introducing energy efficient lighting and ventilation, are integrated into the scheme design. These measures achieve a 2% improvement site wide over Part L.
  
- b) **Be Clean (Supply Energy Efficiently)** – The scheme proposes three energy centres comprising of a CHP engine as the lead energy generator which would be backed up by high efficiency gas fired condensing boilers. This is in line with London Plan Policy 5.6. One energy centre would be provided to the east of Ship Lane; and two to the west of Ship Lane (one for the school, and one for the Application A outline elements). The school has its own energy centre given it would be brought forward and managed independently of the mixed use scheme. There are currently no opportunities for the Site to connect up to a district heat network but capability will be introduced to enable a connection should the opportunity arise in the future.

The 'clean' approach results in achieving a 17.5% improvement site wide over Part L.

- c) **Be Green (Use Renewable Energy)** – A range of renewable energy sources have been considered and assessed for their appropriateness and given site specific constraints, photovoltaic ('PV') panels have been determined as the most appropriate renewable energy technology to incorporate. These would be provided at roof level. This 'green' approach



results in achieving a 1.2% improvement site wide over Part L, with further opportunities to provide PV for Development Area 2 explored at Reserved Matters stage.

- 17.12 Overall, the Energy Strategy sets out that for the detailed elements of the main scheme (i.e. Application A – Development Area 1), the proposed development will result in cumulative energy savings of 21% improvement over Part L.
- 17.13 It is recognised that the scheme will not meet the requirements of LBRuT Core Strategy Policy CP 2 for providing 20% carbon reduction via renewable energy sources – this is because the only suitable renewable energy technology for the Site is PV panels and the amount of PV panels which could be installed is limited by other requirements for roof level layouts. The Energy Strategy provides more detail on the other renewable energy sources assessed, and why these were discounted. In accordance with Core Strategy Policy CP 2, it has therefore been demonstrated that a 20% target from renewable energy alone is not feasible in this instance.
- 17.14 For the school, the development would result in cumulative energy savings of 24% improvement over Part L.
- 17.15 **The proposed development has followed the Mayor’s energy hierarchy to reduce carbon emissions. A range of measures would be incorporated to help the buildings adapt to and mitigate the effects of climate change. This approach is in line with national, regional and local strategic policies to reduce carbon emissions.**

### **Cooling Strategy**

- 17.16 As set out above, both the London Plan (Policy 5.9) and LBRuT’s planning policies (DMP Policy DM SD 4 and emerging Local Plan Policy LP 20) seek for development to adopt a cooling hierarchy to ensure efficient use of energy in achieving suitable temperatures for new homes. In order to aid developers in designing in suitable cooling methods early in the design process, the GLA has prepared a ‘Domestic Overheating Checklist’ (as contained within Appendix 5 of the GLA’s Energy Planning Guidance (2016)).

- 17.17 The cooling strategy has influenced the design of the residential units and building layouts and the submitted Energy Strategy sets out the cooling strategy and includes a completed Domestic Overheating Checklist.
- 17.18 Various mitigation measures have been incorporated into the buildings' design to help regulate internal temperatures and to reduce unnecessary heat generation and heat loss. Mechanical ventilation would be provided in dwellings along with openable windows for natural ventilation.
- 17.19 **Through effective design solutions, the cooling requirement has been minimised, representing approximately 1% of the overall regulated annual energy requirement.**

### **Sustainability Measures**

- 17.20 LBRuT's Sustainable Construction Checklist (2016) sets out the key principles of sustainable design and construction that applicants are expected to follow. A completed checklist has been prepared by Hoare Lea and submitted alongside these applications (included as an appendix to the Sustainability Statement). This should be read alongside the submitted Sustainability Statement, prepared by Hoare Lea, which sets out how the scheme has been designed sustainability and how these principles would be followed through construction and occupation. This is in accordance with London Plan Policy 5.3, LBRuT Core Strategy Policy CP 1, DMP Policy DM SD 1 and emerging Local Plan Policy LP 22.
- 17.21 Aside from specific carbon reduction measures, the Sustainability Statement sets out other areas of the design where sustainable features have been incorporated to reduce the energy demand from the proposed development. These features include:
- a) **Water efficiency** – Water efficient fixtures, fittings and appliances would be installed in the buildings in Development Area 1 and the school. These measures would also be considered for the outline elements in Development Area 2 (which have not been designed in detail yet).
  - b) **Materials** – Materials would be sustainably and responsibly sourced, maximised and re-used, wherever possible.
  - c) **Waste** – Measures would be put in place for the minimisation of waste;

- d) **Transport** – Cycle parking would be provided to encourage sustainable modes of travel.
- e) **Biodiversity** – Measures would be implemented to improve biodiversity and new trees would be planted. Rooftop gardens would be provided for residents where feasible.
- f) **Pollution** – Measures would be incorporated to reduce the impacts of air, noise, light and water pollution.
- g) **Flooding and drainage** – A comprehensive flood resilience strategy and drainage strategy would be implemented to protect the Site from flooding and to reduce surface water run-off.

17.22 The only existing building on Site to be retained in its entirety, the Maltings Building, would be retrofitted with measures to reduce energy consumption, in line with London Plan Policy 5.4 and DMP Policy DM SD 3.

17.23 In terms of BREEAM ratings, the non-residential spaces applied for in detail (i.e. Development Area 1 and the school) will achieve a BREEAM 'Excellent'. This is in accordance with Core Strategy Policy CP1 and emerging Local Plan Policy LP 22. It is anticipated that the care home and flexible assisted living / residential units in Application A (Development Area 2) are also anticipated to achieve BREEAM 'Excellent' and this will be reviewed in greater detail at Reserved Matters stage. The refurbishment of the Maltings building and use as residential will also aim to achieve an 'Excellent' rating under BREEAM Domestic Refurbishment, in line with policy requirements.

17.24 Full details of all sustainable measures incorporated into the design can be found in the Sustainability Statement, prepared by Hoare Lea, as well as in the relevant consultants' reports including the Design and Access Statement (and relevant appendices), prepared by Squire & Partners, the Energy Strategy, prepared by Hoare Lea, the Transport Assessment, prepared by PBA and the noise and vibration, air quality and the surface water resources and flood risk chapters (chapters 9, 10 and 12) contained within the ES.

17.25 **The proposed development will adopt sustainable measures during the construction and operation of the development. This will assist in delivering**

**an energy efficient scheme which minimises environmental impacts.**

## 18 Planning Considerations – Other Technical Considerations

18.1 This section assesses other technical considerations against relevant planning policies. The proposed development is acceptable in all of these technical elements, as demonstrated in this section and the relevant technical documents.

18.2 This section includes an assessment of the following topics:

- a) Ground contamination
- b) Services and utilities
- c) Flooding
- d) Noise and vibration
- e) Air quality
- f) Biodiversity and ecology
- g) Daylight / sunlight
- h) Lighting
- i) Wind microclimate

### a) Ground contamination

18.3 The London Plan seeks to ensure that appropriate measures are taken to ensure that development on previously contaminated land does not activate or spread contamination (Policy 5.21). LBRuT's emerging Local Plan promotes the remediation of contaminated land where necessary when development comes forward (Policy LP 10).

18.4 A Ground Conditions and Contamination Assessment has been prepared by Waterman IE as part of the ES (Chapter 11) which assesses the scope for receptors to be subject to contamination during the construction and operation stages of development.

18.5 Some significant effects are identified but these are proposed to be reduced to insignificant and in some cases beneficial, through mitigation measures. These measures include implementing a Construction Environmental Management Plan ('CEMP') during construction to minimise contamination risks, undertaking a further

desk-based assessment and further ground and geotechnical investigation to inform an appropriate Remediation Strategy as required.

- 18.6 **A Ground Conditions and Contamination Assessment has been prepared which demonstrates that, subject to appropriate mitigation measures, the contamination effects on receptors will not be significant. It is therefore concluded that the proposed development will protect receptors from contamination risks, in accordance with planning policy.**

**b) Services and utilities**

- 18.7 London Plan Policy 5.14 requires development proposals to ensure that adequate wastewater infrastructure capacity is available in tandem with development.
- 18.8 LBRuT will ensure that provision is made for appropriate infrastructure to meet future needs. New developments will be expected to contribute to any additional infrastructure needs generated by the development (Core Strategy paragraph 6.3.1 and Policy CP16). DMP Policy DM SD 10 and emerging Local Plan Policy LP 23 requires developers to provide evidence that capacity exists in the public sewerage and water supply network to serve the development, and that any new infrastructure must be in place prior to occupation of the development.
- 18.9 A Foul Sewage and Utilities Assessment has been prepared by Hoare Lea and submitted as part of the Applications. This document sets out the existing services and utilities infrastructure, and how the proposed development will be served. A Drainage Strategy has also been prepared by Waterman IE which includes details on the proposed foul drainage methods. It is proposed to create new connections into existing sewers. Discussions are ongoing with Thames Water to confirm that the existing public sewer network has the capacity to accommodate the proposed foul flows.
- 18.10 **Consideration has been made for appropriate connections to existing services and utilities infrastructure.**

### c) Flooding and Drainage

- 18.11 The Applications are accompanied by a Surface Water Resources and Flood Risk chapter within the ES (chapter 12), which itself is supported by a Flood Risk Assessment ('FRA'), prepared by Hydro-Logic Services and a Drainage Strategy, which has been undertaken by Waterman IE. The FRA assesses flood risk impacts associated with the sites the subject of Applications A and B. Application C (Chalkers Corner) does not require a flood risk assessment as the proposed works for that application do not include a change of use nor impact on ground levels.
- 18.12 The FRA confirms that the Stag Brewery site is partly within Flood Zone 2 and partly within Flood Zone 3 but behind tidal defences. The proposed development includes 'More Vulnerable' and 'Less Vulnerable' uses, as defined by the PPG (paragraph 066). More vulnerable developments are considered to be appropriate in Flood Zone 2 but are subject to the exception test in Flood Zone 3.
- 18.13 The NPPF seeks to guide development to areas of low flood risk, ideally to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, then sites would be considered in Flood Zone 2 and then 3.
- 18.14 The FRA concludes compliance with the Sequential Test on the basis that LBRuT's Flood Risk Sequential Test (2016) states that it is not possible to provide the proposed uses at the Stag Brewery Site on an alternative site in the Borough at a lower probability of flooding.
- 18.15 The FRA demonstrates that the proposed development satisfies the Exception Test and is therefore considered acceptable in flooding terms against NPPF criteria. The London Plan requires that proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk (Policy 5.12).
- 18.16 A range of flood risk management measures are proposed to make the proposed development safe from the effects of flooding. These include remodelling of the tidal defences (which has been developed in close conjunction with the Environment Agency and the PLA), ensuring appropriate finished floor levels for new development, designing the basements against flooding and implementation of

drainage methods and temporary control of groundwater seepage during excavations.

- 18.17 A Flood Emergency Plan has been prepared, in line with DMP Policy DM SD 6 and emerging Local Plan Policy LP 21. The Plan identifies a safe route from the site to land that is wholly outside Flood Zone 3.
- 18.18 The Surface Water Drainage Strategy sets out the proposed drainage methods, and the principles for how Sustainable Drainage Systems ('SuDS') will be delivered on Site. It confirms that surface water runoff from the Site can be managed sustainably to ensure that flood risk is not increased elsewhere. This satisfies the requirements of the NPPF, the London Plan (Policy 5.13) and LBRuT (DMP Policy DM SD 7, emerging Local Plan Policy LP 21).
- 18.19 **The FRA demonstrates that the proposed development satisfies the NPPF Sequential and Exception tests. A range of flood mitigation measures are proposed to protect the Site occupiers from flooding including through scheme design and re-modelling of the existing tidal defences. Appropriate drainage methods are proposed to protect the local area from an increased risk in flooding. The proposed development is therefore considered to satisfy the relevant requirements of the NPPF, London Plan and LBRuT's flooding and drainage policies.**

#### **d) Noise and Vibration**

- 18.20 The NPPF acknowledges that the planning system should contribute to and enhance the natural and local environment by preventing new development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels noise pollution (paragraphs 109 and 123).
- 18.21 The London Plan states that significant adverse noise impacts as a result of new development should be avoided (Policy 7.15).
- 18.22 In considering development proposals, LBRuT will seek to protect adjoining properties from unreasonable noise and disturbance (Policy DM DC5). The emerging Local Plan seeks to ensure that balconies do not raise unacceptable



overlooking or noise or disturbance to nearby occupiers. Moreover, LBRuT will encourage good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected (Policies LP 8 and LP 10).

- 18.23 The impacts on existing and new residents arising as a result of the proposed development are assessed in full within the ES (chapter 9 – Noise and Vibration, prepared by Waterman IE) and the Noise Impact Assessment, prepared by Hoare Lea. The ES considers the noise and vibration effects on existing and future sensitive receptors; the Noise Impact Assessment considers the suitability of the Site in terms of acoustic levels. Baseline noise surveys have been undertaken to support the conclusions reached in both documents.
- 18.24 The ES chapter considers vibration impacts during construction works and concludes that impacts on sensitive receptors would range from insignificant to temporary, short-term, local adverse effects of minor significance (i.e. the effect is undesirable but of limited concern). For noise during works on Site, these effects are classed as temporary, short-term, local residual effect of minor to moderate adverse. These effects are after implementation of mitigation measures to reduce impact as much as possible. In terms of the completed development, the ES concludes that the noise effects on sensitive receptors would be insignificant.
- 18.25 The Noise Impact Assessment sets design criteria for the proposed development in terms of ventilation, glazing and plant to make the Site suitable for new residential uses.
- 18.26 **The impact of noise and vibration on existing and new residents has been assessed for the construction of the proposed development, and the noise levels generated by the completed development have also been considered. Measures will be put in place to minimise noise and vibration disruption during construction. Once the development has been completed, the noise assessments conclude that the effects on sensitive receptors will be acceptable. The scheme therefore complies with all relevant noise and vibration planning policies.**

**e) Air Quality**

- 18.27 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (paragraph 109). Planning should seek to comply with national and local policies for controlling air pollution (paragraph 124).
- 18.28 The London Plan also seeks to reduce pollutant emissions and minimise public exposure to pollution. The Mayor will work with strategic partners to ensure that the policies of the London Plan support the implementation of his Air Quality and Transport Strategies (Policy 7.14).
- 18.29 At a local level, LBRuT Core Strategy Policy CP 1 requires that environmental impacts of development, including air quality impacts should be minimised. The emerging Local Plan states that developers should commit to ‘Emissions Neutral’ development where practicable. Mitigation measures to reduce the development’s impact upon air quality and strict mitigation for developments to be used by sensitive receptors, such as schools and care homes in areas of existing poor air quality will be required (Policy LP 10). LBRuT has also adopted an ‘Air Quality Action Plan’ (2002) which outlines guiding principles in relation to air quality.
- 18.30 A full assessment of potential air quality impacts has been carried out by Waterman IE and is set out within Chapter 10 of the ES. The assessment considers the air quality impacts arising as a result of the works on Site to bring forward the development, as well as the operational impacts arising as a result of operational road traffic and proposed heating plant. An assessment has also been carried out on the air quality impacts arising as a result of the proposed works to Chalkers Corner (Application C). The assessments have used baseline air quality monitoring data obtained from LBRuT.
- 18.31 The main likely effects on local air quality during the works would relate to dust, and a range of measures to minimise or prevent dust are proposed to be implemented via a CEMP so that no significant dust effects would result. The effect of construction vehicles and construction plant has been assessed to be insignificant. In terms of the operational development, the modelling results identified that the highways works proposed would have a beneficial effect on air quality, and act as

mitigation against the impact of the proposed development on air quality, particularly at Chalkers Corner. Specifically in relation to Chalkers Corner, the assessment sets out that the works to Chalkers Corner (Application C) would improve air quality concentrations at properties at Lower Richmond Road but would worsen some properties at Chertsey Court before mitigation is considered. The new landscaping (including a wall and mature planting) would improve the predicted air quality concentrations in Chertsey Court.

- 18.32 The development includes measures that would benefit local air quality such as, electric vehicle charging points, cycle routes and pedestrian walkways, new car club spaces etc. Overall, the assessment concludes that the proposed development would not give rise to a significant air quality effect that would adversely affect the occupants of existing sensitive locations surrounding the Site or future residential and school users of the development.

#### *Odour Impacts*

- 18.33 Emerging Local Plan Policy LP 10 states that the Council will seek to ensure that any potential impacts relating to odour and fumes from commercial activities are adequately mitigated through suitable filtration and abatement technologies and appropriate filtration siting and design.
- 18.34 As set out within section 4 of this Town Planning Statement, the flexible commercial uses include an element of restaurant uses, which would necessitate the need for kitchen extraction equipment. At this stage, the details of occupiers are unknown and therefore these details cannot be progressed at this time. In the absence of this information, Waterman IE has prepared an Odour Assessment Report which sets out design guidelines that will be followed for any units requiring kitchen extraction equipment.
- 18.35 **The impacts on air quality from the proposed development have been thoroughly considered, both in terms of impacts during construction and when the development is operational. The assessments conclude that the impact on air quality is acceptable, and that the proposed works at Chalkers Corner will mitigate the air quality impacts as a result of the development. An Odour Assessment Report has been prepared which sets out guidelines for**

**proposed kitchen extraction equipment.**

**f) Biodiversity and Ecology**

- 18.36 An Ecology Assessment has been prepared by Waterman IE as part of the ES (Chapter 13) to assess the impact of the development on terrestrial ecology and nature conservation features. The Assessment considers what environmental factors could be affected by the proposed development and then assesses the potential impact of the different stages of development against set significance criteria.
- 18.37 The NPPF states that planning should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible (paragraph 109). It also states that opportunities to incorporate biodiversity in and around developments should be encouraged (paragraph 118).
- 18.38 As set out in London Plan policy 7.19, the Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.
- 18.39 LBRuT expect all new development to preserve and, where possible, enhance existing habitats including river corridors and biodiversity features, including trees. Building design and landscaping should aim attract wildlife and promote biodiversity, where possible. New habitats and biodiversity features should make a positive contribution to and should be integrated and linked to the wider green and blue infrastructure network (Core Strategy Policy CP4, DMP Policy DM OS 5 and emerging Local Plan Policy LP 15). LBRuT have also adopted a SPG entitled 'Nature Conservation and Development' which encourages nature conservation for new development proposals.
- 18.40 The Ecology Assessment notes that the Site is not subject to a statutory ecological designation. The River Thames and Tidal Tributaries, directly to the north of the

Site, is designated as a Site of Importance for Nature Conservation ('SINC'), with Metropolitan value.

- 18.41 The Assessment identifies effects on local ecology from the development during construction and operation of the proposed development. The residual effects on biodiversity are all considered to be insignificant, except for indirect effects on the River Thames and Tidal Tributaries SINC from pollution and direct effects on commuting and foraging bats, which are considered to have long-term, local, beneficial effects of minor significance.
- 18.42 Proposed works to enhance biodiversity and ecology on Site are factored into Waterman IE's assessment of ecological impact. These include the planting of new trees and hedges, use of native species, or species of benefit to wildlife where new planting is proposed, provision of biodiversity roofs, provision of a green link, community park and pocket park and provision of bat boxes. Further detail on the proposed urban greening measures can be found within the submitted Landscape Design and Access Statements for Applications A and C, prepared by Gillespies, and the landscape section of the school Design and Access Statement (Application B).
- 18.43 **Impact on the surrounding ecology and biodiversity has been considered in the submitted Ecology Assessment against ES significance criteria. A number of measures are proposed to encourage biodiversity, including creating green spaces and planting. The proposed development will therefore protect and enhance ecology and biodiversity in line with policy requirements.**

**g) Daylight / Sunlight**

- 18.44 The NPPF stipulates that planning policies and decisions should always seek to secure a good standard of amenity for existing and future occupants of land and buildings (paragraph 17).
- 18.45 The BRE document 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2011) provides non-statutory guidance on matters of daylight and sunlight and overshadowing. These guidelines are often referenced in adopted

planning policies.

- 18.46 The London Plan states that planning decisions in respect of buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to overshadowing. Also, large buildings should not adversely affect their surroundings in terms of overshadowing and solar reflected glare, which can be mitigated through providing high quality internal spaces (Policies 7.6 and 7.7).
- 18.47 LBRuT's DMP states that the Council will seek to ensure that the design and layout of buildings enables sufficient sunlight and daylight to penetrate into and between buildings and that adjoining land or properties are protected from overshadowing in accordance with established standards (DMP Policy DM DC 5). LBRuT's emerging Local Plan (Policy LP 8) echoes DMP Policy DM DC 5 and also seeks to improve existing daylight and sunlight conditions where they are substandard. Emerging Local Plan Policy LP 2 on building heights also requires buildings to be designed to take account of climatic effects, including overshadowing.
- 18.48 Chapter 18 of the ES, prepared by eb7, includes an assessment of the likely significant effects of the proposed development on daylight, sunlight, overshadowing and light pollution at sensitive receptors surrounding the Site. In terms of daylight, once the development is completed the ES concludes that the likely effects on daylight for residential properties in the vicinity of the Site would range from being insignificant for the majority of the residential properties to long-term, local, adverse effects of minor and minor to moderate significance. The minor to moderate adverse effects are generally isolated or driven by self-light limiting overhangs. Furthermore, the ES assessment has considered a 'worst-case' scenario for massing for the outlined elements of the scheme (Development Area 2) and thus as the scheme evolves the impacts are likely to lessen. In terms of sunlight, the assessment concludes that once the development is completed, the effects on sunlight for residential receptors in the vicinity of the Site are insignificant.
- 18.49 With regard to overshadowing, once the development is completed, the likely residual effects on overshadowing to existing surrounding amenity areas would remain insignificant. The likely effects on overshadowing to the proposed amenity areas within the development would range from being insignificant to long-term,

local, adverse and of moderate significance, with the moderate adverse effects generally being isolated to a small number of areas. Again, there could be scope to improve impacts once outline elements are brought forward into detailed design via Reserved Matters.

18.50 eb7 has also prepared a standalone report which assesses the internal daylight and sunlight levels that new residents would experience once the scheme had been built and occupied, as well as overshadowing impacts for amenity spaces. In terms of daylight, the assessment shows that circa 91% of all rooms would meet or exceed BRE targets well in excess of all the levels. Where levels are below targets, this is due primarily to overhanging balconies and wider Site constraints. With respect to the sunlight assessment, there are some instances where direct sunlight to the window face will be limited. However, this is usual for a scheme of this type where the orientation of the Site dictates east-west units. For the overhanging assessment, 70% of amenity spaces assessed would achieve direct sunlight levels in line with BRE criteria.

18.51 **Impact on daylight/sunlight and overshadowing has been assessed. The majority of effects on existing local receptors are deemed to be insignificant. With regard to new residents, the Internal Daylight and Sunlight report concludes that the provision of daylight within the proposed units is in accordance with the intentions of the BRE guidance and therefore local planning policy.**

#### **h) Lighting**

18.52 As set out within this Town Planning Statement and within the submitted Lighting Masterplan, prepared by Michael Grubb Studio, the proposed development will incorporate new lighting. This will be on the edges and within the Site and different lighting would be selected to respond to the function and space of the relevant area. The Masterplan sets out indicative details of lighting, with full details to be confirmed and agreed with LBRuT in due course. Of particular importance is the new sports pitch – this will be floodlit and further details are included within the submitted Sports Pitch Lighting Assessment, prepared by Michael Grubb Studio.

18.53 London Plan Policy 3.19 states that the provision of sports lighting should be

supported in areas where there is an identified need to increase sports participation opportunities, unless the lighting gives rise to demonstrable harm to the local community or biodiversity. This approach to floodlighting is reflected in LBRuT's relevant policies, DMP Policy DM OS 9 and emerging Local Plan Policy LP 9.

18.54 In terms of environmental effects arising as a result of proposed lighting, Chapter 18 of the ES considers lighting impacts, including from the sports floodlights, on sensitive receptors. These impacts are deemed to be insignificant. The submitted Sports Pitch Lighting Assessment includes further detail of how impacts from the sports floodlighting in particular will be minimised.

**18.55 The scheme will incorporate new lighting, including floodlighting for the new sports pitch. The impact of this lighting on the surrounding environment has been assessed as insignificant and therefore is acceptable.**

**i) Wind microclimate**

18.56 The London Plan states that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to a range of matters, including wind. This is considered particularly important for tall buildings (Policy 7.6, 7.7), a 'tall' building being one that is substantially taller than its surroundings, cause a significant change to the skyline or is larger than the Mayoral threshold for referable applications.

18.57 LBRuT emerging Local Plan Policy LP 2 also requires that new building design and heights take account of climatic effects, including diversion of wind speeds.

18.58 A Wind Microclimate Assessment has been prepared by RWDI as part of the ES (Chapter 17). RWDI has carried out wind tunnel testing to fully assess the impact of the development upon pedestrian wind microclimate. In terms of how the effects are measured, RWDI have used the Lawson Comfort Criteria which seeks to define the reaction of an average pedestrian to the wind. Significance criteria have then been based upon the relationship between the pedestrian use at a particular location and the modelled wind conditions at the same location.

**18.59 The Wind Microclimate Assessment demonstrates that the proposed**



**development would have insignificant or beneficial effects on the local wind microclimate. Mitigation measures to reduce wind tunnel effects have been recommended to be incorporated into the design of buildings where appropriate.**

## 19 Planning Obligations and Infrastructure Requirements

- 19.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, LPAs have the power to enter into planning obligations with any person interested in land in their area for the purpose of regulating or restricting the development or use of land.
- 19.2 In accordance with Regulation 122 of the Community Infrastructure Levy ('CIL') Regulations, and paragraph 204 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- a) Necessary to make the proposed development acceptable in planning terms;
  - b) Directly related to the proposed development; and
  - c) Fairly and reasonably related in scale and kind to the proposed development.
- 19.3 Paragraph 203 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 19.4 For development proposals within London, the Mayor of London is a CIL charging authority for the purposes of Part 11 of the Planning Act 2008. Accordingly, a Mayoral CIL charge is set out within the Mayor's CIL Charging Schedule (2012).
- 19.5 The London Borough of Richmond-Upon-Thames has adopted its CIL Charging Schedule (November 2014) and a revised Planning Obligations SPD (July 2014).
- 19.6 The proposed development will be liable for CIL payments.

### **Draft Heads of Terms**

- 19.7 The Applicant anticipates entering into a legal agreement with LBRuT to secure the reasonable and necessary planning obligations associated with the proposed development in accordance with regulation 122 of the CIL Regulations and LBRuT's Planning Obligations SPD.
- 19.8 Some potential draft heads of terms for the legal agreement are set out below,

which are to be discussed with LBRuT in due course:

- a) Affordable housing
- b) Land for school and playing fields (Application B) to be offered to ESFA or their nominee prior to commencement of Application A
- c) Chalkers Corner works (Application C) to be completed prior to occupation of school (Application B) or agreed level of buildings in Application A being occupied
- d) Other transport measures:
  - i. Car club spaces;
  - ii. Car parking management plan for Blue Badge holders;
  - iii. Implementation of Travel Plans;
  - iv. Resident parking permit restrictions;
  - v. Safeguarding land for bus turnaround;
  - vi. Highways works to be secured and then delivered through subsequent section 278 agreement
- e) If necessary a carbon offsetting contribution
- f) Sports provision:
  - i. Community Use Agreement for use of school sports facilities by local groups outside of school hours
  - ii. Re-provision of facilities for local football club
- g) Towpath works
- h) Employment and skills training measures
- i) Future maintenance regime for public realm
- j) Provision of community space
- k) Provision of boat shed
- l) Public art provision
- m) Refurbishment and re-use of Maltings and Hotel Buildings

## 20 Conclusions

- 20.1 Reselton Properties Limited proposes the comprehensive redevelopment of the Former Stag Brewery Site in Mortlake for a significant mixed-use residential-led scheme to create a new heart for Mortlake, comprising up to 667 residential homes (including affordable homes), potential accommodation for an older population, complementary commercial uses, community facilities, a new secondary school and extensive public open landscaped space.
- 20.2 The submission of the Applications follows an extensive period of pre-application consultation dating back to spring 2016, with various stakeholders including local groups, statutory bodies and the decision-making authorities. Feedback and advice received during this process has shaped and influenced the proposed masterplan scheme submitted for consideration.
- 20.3 This Town Planning Statement has assessed the proposed development against the development plan and other relevant planning policy guidance at national, regional and local policy levels. This includes the provisions of the adopted SBPB and the emerging (advanced stage) site-specific development allocation policy of the Local Plan.
- 20.4 The adopted SBPB identifies the key planning objectives and aspirations for the application site's comprehensive redevelopment. LBRuT's vision for the site's redevelopment is stated as providing:
- a) The creation of a new village heart for Mortlake;
  - b) High quality buildings and public realm;
  - c) A new recreational and living quarter with a mix of uses;
  - d) Enlivened riverside frontage and activity;
  - e) A new green space linking to the riverside to allow community access;
  - f) Creation of a 'sense of place';
  - g) Animated and active frontages;

- h) Local employment, community and leisure opportunities;
- i) Biodiversity enhancements; and
- j) Sustainable development.

20.5 The proposals meet the above aims and objectives in full and would generate **significant benefits** including:

- a) The opportunity for the development of a strategic site identified in the Local Plan, contributing to the comprehensive regeneration of this part of the Borough;
- b) A significant amount of new housing (including affordable housing and potential housing for an older population) of a range of types and sizes;
- c) A mix and appropriate amount of supporting uses to ensure vitality and vibrancy, animation and activity, evening entertainment opportunities and meet local needs, contributing to the establishment of a new village heart for Mortlake;
- d) High quality building design based on planning policy design standards and requirements including in relation to layout, appearance, height, scale and massing, heritage impacts and safety and security;
- e) An attractive and pleasant living environment for occupants of the development in respect of density, accessibility, residential design standards, unit sizes and internal layouts, access to amenity space and playspace;
- f) Extensive landscape and public realm throughout the whole site, including significant areas of green open spaces, hard-landscaped squares and piazzas and various routes and links through the site connecting with Mortlake centre and the river;
- g) Improved connections and permeability for pedestrians and cyclists, linking the Site into the existing network of routes and establishing new routes;
- h) Opportunities for landscape and public realm enhancements in the wider area, including at Mortlake Green and Sheen Lane;
- i) Creation of significant local employment opportunities both during the construction phase and as part of the completed development, through provision

of a significant amount of employment-generating uses;

- j) A new secondary school and sixth form, with associated play and sports facilities to meet identified Borough education needs;
- k) Shared community use of sports facilities to open up access of these facilities to wider community groups, local teams and sports clubs and provide significant sporting benefits to the wider area;
- l) A sustainable and energy-efficient development, resilient to climate change, through a comprehensive approach to reducing energy use and carbon emissions through the use of renewable and low-carbon technology; and
- m) Enhanced biodiversity opportunities throughout the scheme.

20.6 The proposals would achieve the stated aims, objectives and aspirations of the adopted SBPB and accord with all layers of planning policy, including the provisions of the adopted development plan. The proposals are therefore acceptable in planning policy terms and there are no other material planning considerations that should prevent the scheme from being granted planning permission.

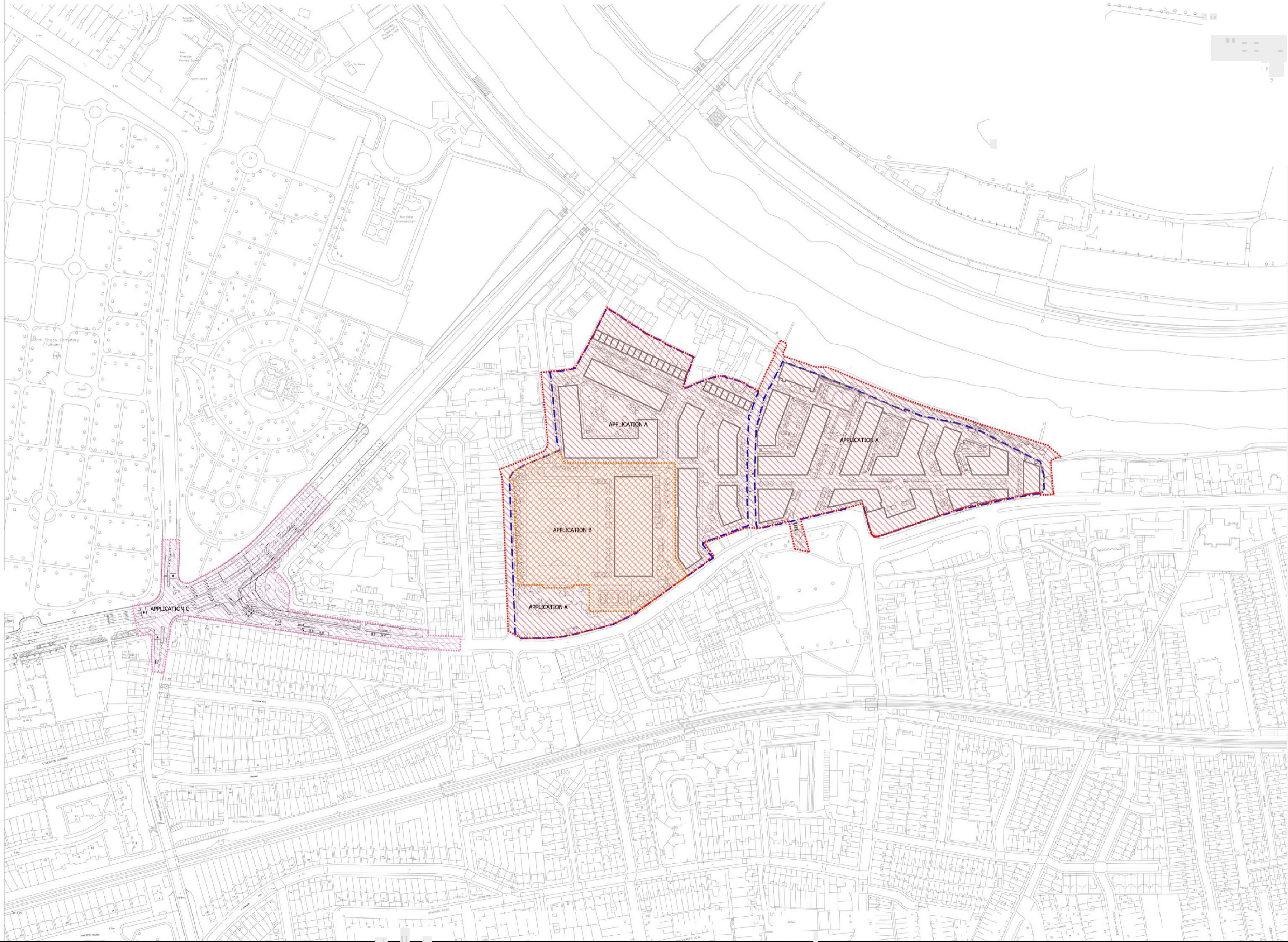


**GERALDEVE**

# **Appendix A**

## **Plans Referred to Within Town Planning Statement**

- i. Site Application Boundaries: Application A, B and C  
(ref. C645\_Z0\_P\_00\_001)**
- ii. Development Area 1 and Development Area 2  
Boundaries (ref. JA12\_Z0\_P\_00\_008)**
- iii. Proposed Masterplan Ground Floor Level  
(ref. C645\_MP\_P\_00\_001)**
- iv. Alternative Phase 1 masterplan (ref. 100\_P1\_P\_TY\_001)**
- v. Indicative Plot Plan**



NOTES  
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 2. ALL DIMENSIONS AND SPACINGS TO BE REPORTED TO THE ARCHITECT IMMEDIATELY

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- Site Ownership Boundary
- Application A Boundary
- Application B Boundary
- Application C Boundary
- Application A
- Application B
- Application C
- Site included in Application B to enable temporary access

Note: Application B site is wholly within Application A boundary

PLANNING APPLICATION 12/02/18 B1

**SQUIRE & PARTNERS**

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 T: 0207 718 6454  
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 www.squirepartners.com

For: The Stag Brewery  
 Lower Richmond Road  
 London, SW14 7ET

**SITE APPLICATION BOUNDARIES:  
 APPLICATION A, B AND C**

DATE: 04/10/17  
 DRAWN BY: [Name]  
 CHECKED BY: [Name]  
 100%  
 10/10/17  
 16109 C645\_Z01\_00\_001





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Development Area 1  
Development Area 2

PLANNING APPLICATION 12/02/18 BJ  
Date Check Ref

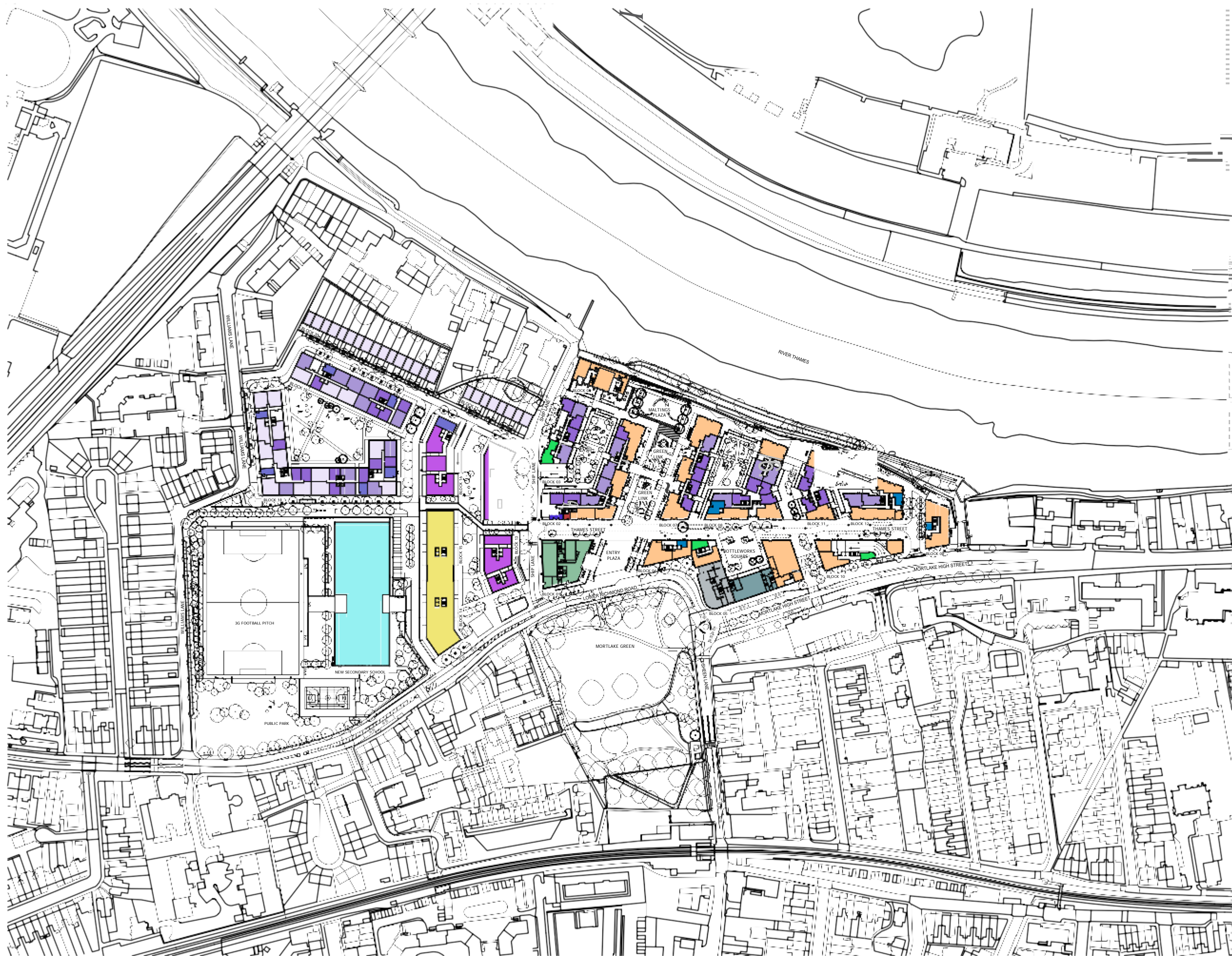
**SQUIRE & PARTNERS**

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283 Ferndale Road, London SW14 8ET  
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info@squireandpartners.com  
www.squireandpartners.com

Project  
The Stag Brewery  
Lower Richmond Road  
London, SW14 7ET

Drawn  
DEVELOPMENT AREA 1 AND  
DEVELOPMENT AREA 2 BOUNDARIES

04/10/17  
KHO  
16019 JA12\_Z0\_P\_00 008



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NORTH

- 1 BED
- 1 BED (L)
- 1 BED (S)
- 2 BED
- 2 BED (L)
- 2 BED (M)
- 3 BED
- 3 BED (H)
- 3 BED (L)
- 4 BED
- 4 BED (H)
- 4 BED (L)
- ASSISTED LIVING
- CARPARK ENTRANCE
- CARE HOME
- CINEMA
- CORE
- FLEXIBLE USE
- GAS METER ROOM
- HOTEL
- OFFICE
- PLANT
- REFUSE
- REFUSE STORE
- RESTAURANT/BAR
- SCHOOL
- SUBSTATION

0 12.5 25 62.5 125 m

PLANNING APPLICATION	12/02/18	BJ
Revision description	Date	Check Rev

**SQUIRE & PARTNERS**

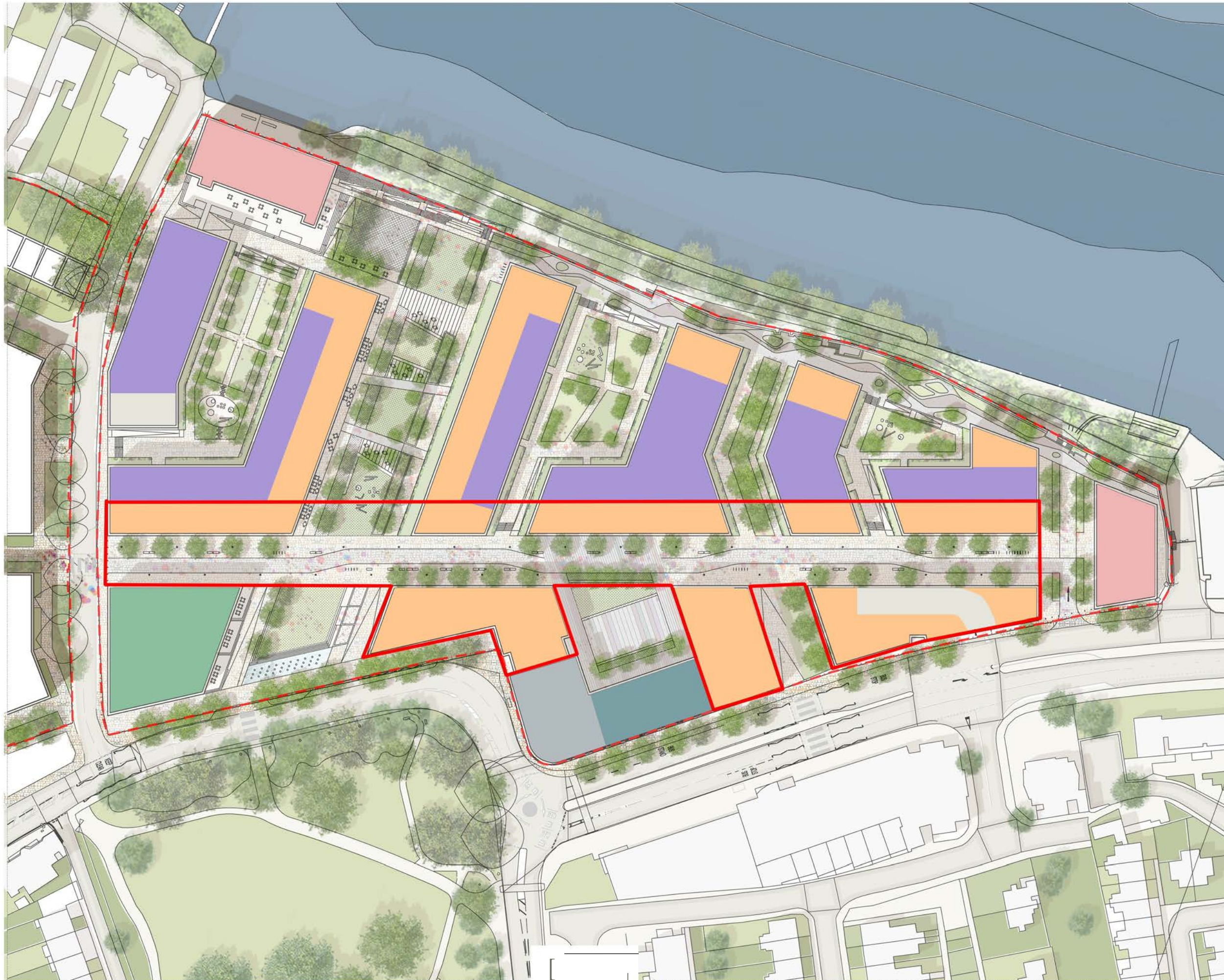
The Department Store  
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T: 020 7278 5555 F: 020 7239 0495

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www.squireandpartners.com

Project  
Stag Brewery  
Richmond

Drawing  
PROPOSED MASTERPLAN  
GROUND FLOOR LEVEL

Drawn	Date	Scale
TC	18/01/18	1:1250 @ A1 1:2500 @ A3
Job Number	Drawing number	Revision
16019	C645_MP_P_00_001	-



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Flexible Use Zone

Revision description	Check	Rev

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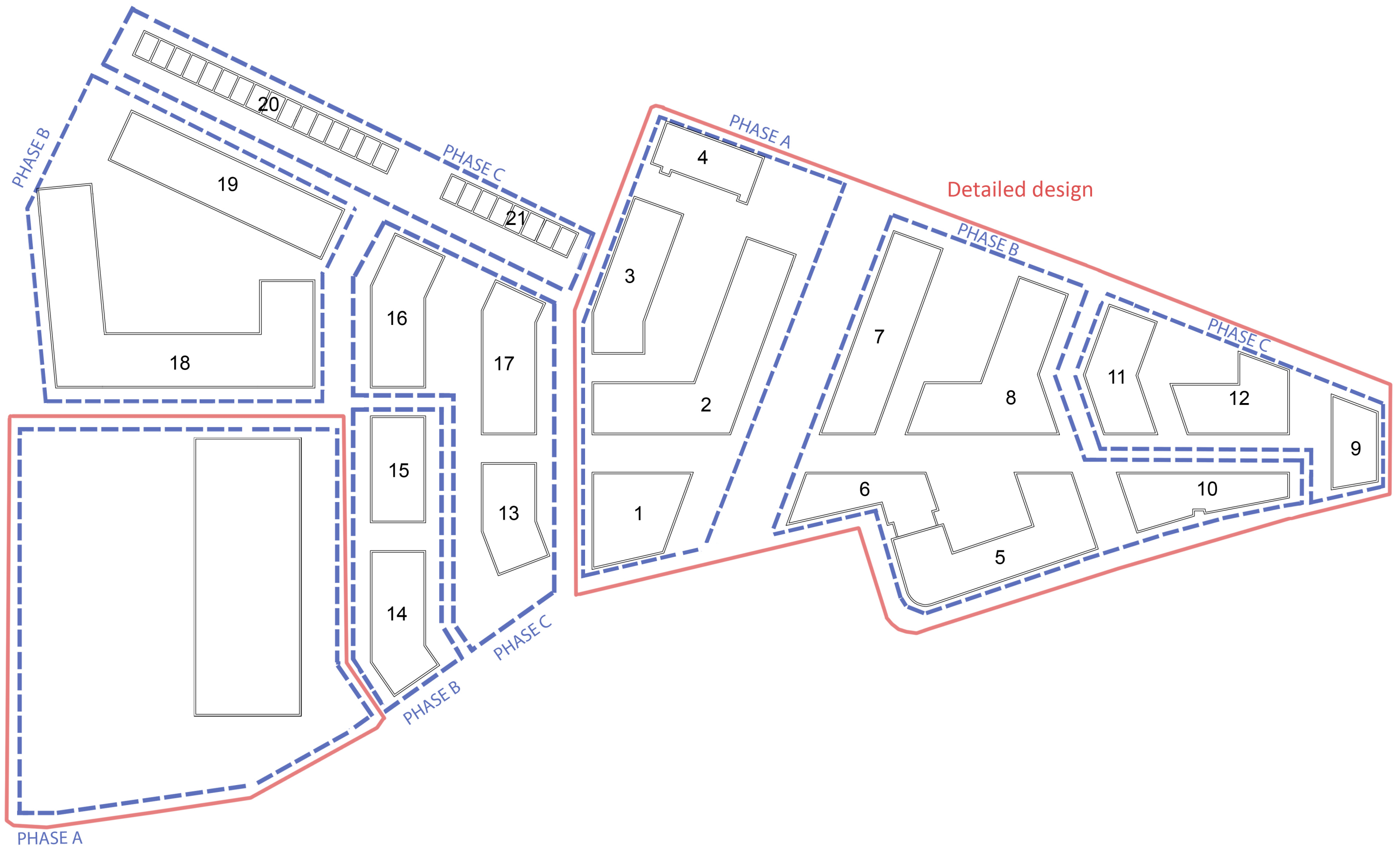
77 Wicklow Street London WC1X 9JY  
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info@squireandpartners.com  
 www.squireandpartners.com

Project  
**The Stag Brewery**  
 Lower Richmond Road  
 London, SW14 2ET

Drawing  
**Alternative Phase 1 masterplan**

Drawn	Date	Scale
KH	25/05/2017	1:500 @ A1 1:1000 @ A3
Job number	Drawing number	Revision
16019 G100_P1_P_TY_001		





GERALDEVE

# **Appendix B**

## **Planning History Schedules**

- i. Former Stag Brewery Site (Applications A and B)**
- ii. Chalkers Corner Site (Application C)**



## Planning History: Former Stag Brewery Site (Applications A and B)

Reference No.	Type of Application	Description	Decision	Decision Date
06/4226/FUL	Full	Proposed new modular office building to west site.	Withdrawn	20 Mar 2007
05/2889/FUL	Full	Erection of extension to rear of existing gatehouse between existing gates with internal renovations and alterations to front elevation including new ramped access.	Granted	15 Nov 2005
05/2666/FUL	Full	Creation of new vehicular access from car park onto Ship Lane.	Refused	2 Nov 2005
04/0134/FUL	Full	Extension and alteration to roof and rear of the existing administration block with associated works including bridge link between proposed extension and brewhouse.	Granted	15 Apr 2004
03/0166/FUL	Full	Renewal of planning permission 98/0455/FUL for an extension to the existing process block.	Granted	4 Mar 2003
01/0511	Full	Replacement of existing cooling towers to upper most roof of existing energy centre to east site due to upgrading of equipment.	Granted	15 May 2001
01/0149/1/FP	Full	Refurbishment of interior club house	Granted	10 May 2001
01/00129/EN	Enforcement	Unauthorised building works (gates)	Closed	15 May 2001
99/2637	Full	Replacement cooling tower to uppermost roof of existing energy centre to east site due to upgrading of equipment.	Granted	03 Dec 1999
99/0786	Full	Development comprising the relocation of an existing tank for the storage of sodium hydroxide used in the operations of the brewery. Extension of bounded area.	Granted	26 May 1999
98/0108/FP	Full	Removal of existing tanks (no. 2) to brewhouse and replace with No 3 vertical tanks through first floor to ground floor.	Granted	23 Mar 1998
98/1657/FUL	Full	Amendment to planning permission ref: 95/1625/FUL for redevelopment of part of the existing brewery site to provide a bottling hall, storage and administrative building and associated works (in two phases), all ancillary to the main operation.	Granted	5 Oct 1998
98/1619/FP	Full	Extension to form warehouse and conversion of existing warehouse to form bottling facility	Deemed approval	24 May 1999
98/0693	Full	Amendment to planning permission 95/1625/FUL (for redevelopment of part of the existing brewery site to provide a bottling hall, storage and administrative	Granted	6 Oct 1998

		building and associated works (in two phases) all ancillary to the main brewery operation		
98/1797/FP	Full	Formation Opening	Granted	24 Nov 1998
98/0455	Full	Extension to existing process block.	Granted	13 Jul 1998
97/1517	Full	Re-cladding of existing vessel building.	Granted	18 Sep 1997
97/0734/FP	Full	Extension to existing dry powder store	Refused	24 Jun 1997
96/4135/DD01	AOD	Details pursuant to Bd11u (external finishes) and Nso2u (colour) of advertisement consent 96/4135/adv dated 10/4/97	Granted	24 Jul 1997
96/3252/FUL	Full	Erection of open sided store to rear of existing bright beer building	Granted	16 Dec 1996
95/1625/DD09	AOD	Details pursuant to condition Pk06 (cycle parking) of planning permission 95/1625/ful dated 20/7/95	Granted	19 Sep 1996
95/1625/DD08	AOD	Details pursuant to condition Bd12 (materials) planning permissions 95/1625/ful	Granted	19 Sep 1996
96/2546/FUL	Full	Erection of hydrochloric acid storage tank used in the cleaning and treatment of water	Granted	28 Aug 1996
96/2466/FUL	Full	Provision of new access slip road to east gate, to include new wall with railings, crossover and emergency exit gate	Granted	08 Jan 1997
96/1735/FUL	Full	Provision of access panel to brewhouse building	Granted	14 Aug 1996
96/1132/FUL	Full	Extension to existing process block including new stair tower.	Granted	27 Aug 1996
95/1625/DD0A	AOD	Details pursuant to condition Dv18 (refuse arrangements) of planning permission 95/1625/ful dated 20 July 1995	Granted	27 Aug 1996
96/0999/FUL	Full	Cladding and recladding of existing vessel buildings with associated works comprising new plant room at first and second floor levels over service road	Granted	22 Aug 1996
96/0998/FUL	Full	External alterations to north and east face of Block L and P (facing into site) comprising new plant room at first and second floor levels over service road	Granted	20 Aug 1996
96/0868/FP	Full	Conversion of an existing loading canopy into a powder storage area and conversion of an open area into a mixing room		22 July 1996
96/0715/FP	Full	Single storey office enclosure within existing building	Granted	05 Jun 1996
96/0561/FUL	Full	External alterations and extensions to existing gatehouse comprising new WC, windows, doors and access ramps	Granted	04 Apr 1996
96/0169/1/FP	Full	Extensions and alterations to west site gatehouse	Granted	01 Apr 1996
95/1625/DD07	AOD	Details pursuant to condition Ns02 (sound insulation) of planning permission of planning permission 95/1625/ful	Granted	04 Apr 1996
95/1088/3/FP	Full	New bottling hall and administration building		01 Apr 1996
95/2837/FUL	Full	Erection of new section of 4m high wall fronting the river and erection of a replacement 3.2m high gate in existing opening on Mortlake High Street.	Granted	18 Jan 1996

95/1625/DD06	AOD	Details pursuant to Condition Ns02 (sound insulation & soundproofing). Attached to Planning consent 95/1625/ful dated 20/7/95.	Granted	24 Oct 1995
95/1625/DD03	AOD	Details pursuant to Condition Bd12 (materials) of planning permission 95/1625/ful dated 20/7/95.	Granted	27 Oct 1995
95/1625/DD05	AOD	Details Pursuant to Condition Bd04 (specified scale – riverside walk) of planning permission 95/1625/ful dated 20/7/95.	Granted	20 Oct 1995
95/1625/DD04	AOD	Details Pursuant to Condition Bd12 (materials) in Part of Planning Permission 95/1625/full dated 20/7/95.	Granted	20 Oct 1995
95/1625/DD02	AOD	Details Pursuant to Condition Ns01 (in part-windows) of Planning Permission 95/1625/full dated 20/7/95.	Granted	20 Oct 1995
95/1625/DD01	AOD	Details Pursuant to Condition Lb12 Archaeology of planning permission 95/1625/ful dated 20/7/95.		
95/2837/FUL	Full	Erection of new section of 4m high wall fronting the river and erection of a replacement 3.2m high gate in existing opening on Mortlake High Street	Granted	18 Jan 1995
95/2133/FUL	Full	Erection of new gatehouse and gates	Granted	28 Sep 1995
95/1625/FUL	Full	Erection of a bottling hall, storage and administrative building and a 6.2m high wall (in part) adjacent to the towpath	Granted	20 Jul 1995
95/0723/CAC	CAC	Partial demolition of buildings fronting Mortlake High Street	Granted	17 May 1995
95/0621/FUL	Full	Provision of light controlled vehicle crossing including demolition of existing wall, erection of 3.3m high wall and 2 no. Gates and repositioning and reconfiguration of existing staircase	Granted	15 Nov 1995
95/0262/FUL	Full	Extension to filtration block and compensating alteration to sports ground by removal of lorry park, and incorporation into land of townscape importance	Withdrawn	13 Apr 1995
94/3216/FUL	Full	Erection of new bottling plant	Granted	16 Mar 1995
94/0987/FUL	Full	Demolition of existing brick wall approximately 20m long x 2m high and erection of a metal railing fence approximately 2.5m o/a height	Granted	27 May 1994
93/0123/BN		Remedial works at the old silo		5 Feb 1993
92/1290/FUL	Full	Change of use of boat house/store to art gallery.	Withdrawn	19 Oct 1992
91/1260/1/FP	Full	Internal alterations to reception area	BCO	21 Jan 1992
87/06176/FULL	Full	Reconstruction at fourth floor and above and construction of a new 6th floor for office use	Refuse	17 May 1988
88/0532	Full	Retention of plant safety barrier faced in acoustic panels.	Granted	21 Jun 1988
87/0242	Full	Improvements to the existing Effluent treatment plant.	Granted	27 May 1987
85/1292	Full	Extension to beer conditioning building for production and distribution of beer. (Amended Plan No. 100/374/6 received on 15.11.85; and additional plan 866/1A	Granted	11 Mar 1986



		received 30.12.85).		
84/0451	LBC	The Tow Path wall of E Block to be reduced to a height of 22ft 0ins above the Tow Path level. The wall to be made good to match adjoining wall of conservation area.	Granted	28 Jun 1984
79/1207	Full	Provision of frame and cladding for housing a balloon which collects C.O.2	Granted	11 Oct 1979
79/0215	Full	Extension for housing compressors, yeast tanks and small office, provision of frame and cladding for housing balloon.	Granted	02 May 1979
78/53/1	Full	Use for the storage, assembly and upholstery of office furniture	Permission not required.	12 Jun 1978
78/0165	Full	Use of premises for precision sheet metal engineering.	Refused	18 Apr 1978
77/0459	Full	Demolition of the existing sports pavilion and the erection of new building for the conditioning/storage and distribution of beer; erection of new sports pavilion incorporating flat.	Granted	17 Oct 1977



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**Planning History: Chalkers Corner Site (Application C)**

<b>Address</b>	<b>Reference No.</b>	<b>Type of Application</b>	<b>Description</b>	<b>Decision</b>	<b>Decision Date</b>
171 Lower Richmond Road Mortlake London SW14 7HX	09/1988/ADV	Advertisement consent	[Split decision] 2 Projecting signs on each elevation facing road and one retractable awning on the chalkers corner elevation	Split Decision	14 September 2009



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**Planning Policy Matrix**

This matrix sets out relevant London Plan and London Borough of Richmond Upon Thames planning policies considered as part of all of the Applications. The vast majority are referred to within the text of the Town Planning Statement.

<b>Policy Title</b>	<b>Policy</b>
<b>London Plan (March 2016)</b>	
London in its Global, European and United Kingdom Context	2.1
London and the Wider Metropolitan Area	2.2
Sub-regions	2.5
Outer London: Vision and Strategy	2.6
Outer London: Economy	2.7
Outer London: Transport	2.8
Town Centres	2.15
Green Infrastructure: the Multi Functional Network of Green and Open Spaces	2.18
Ensuring Equal Life Chances For All	3.1
Improving Health and Addressing Health Inequalities	3.2
Increasing Housing Supply	3.3
Optimising Housing Potential	3.4
Quality and Design of Housing Developments	3.5
Children and Young People's Play and Informal Recreation Facilities	3.6
Large Residential Developments	3.7
Housing Choice	3.8
Mixed and Balanced Communities	3.9
Definition of Affordable Housing	3.10
Affordable Housing Targets	3.11
Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes	3.12
Affordable Housing Thresholds	3.13
Co-ordination of Housing Development and Investment	3.15
Protection and Enhancement of Social Infrastructure	3.16
Health and Social Care Facilities	3.17
Education Facilities	3.18
Sports Facilities	3.19
Developing London's Economy	4.1
Offices	4.2
Managing Industrial Land and Premises	4.4
London's Visitor Infrastructure	4.5
Support for and Enhancement of Arts, Culture, Sport and Entertainment	4.6
Retail and Town Centre Development	4.7
Supporting a Successful and Diverse Retail Sector and Related Facilities and Services	4.8
Small Shops	4.9
Encouraging a Connected Economy	4.11
Improving Opportunities for All	4.12
Climate Change Mitigation	5.1
Minimising Carbon Dioxide Emissions	5.2
Sustainable Design and Construction	5.3
Retrofitting	5.4
Electricity and Gas Supply	5.4A
Decentralised Energy Networks	5.5
Decentralised Energy in Development Proposals	5.6
Renewable Energy	5.7
Innovative Energy Technologies	5.8
Overheating and Cooling	5.9
Urban Greening	5.10
Green Roofs and Development Site Environs	5.11
Flood Risk Management	5.12
Sustainable Drainage	5.13

Water Quality and Wastewater Infrastructure	5.14
Water Use and Supplies	5.15
Waste Net Self-Sufficiency	5.16
Waste Capacity	5.17
Construction, Excavation and Demolition Waste	5.18
Aggregates	5.20
Contaminated Land	5.21
Strategic Approach	6.1
Providing Public Transport Capacity and Safeguarding Land for Transport	6.2
Assessing Effects of Development on Transport Capacity	6.3
Enhancing London's Transport Connectivity	6.4
Funding Crossrail and Other Strategically Important Transport Infrastructure	6.5
Better Streets and Surface Transport	6.7
Cycling	6.9
Walking	6.10
Smoothing Traffic Flow and Tackling Congestion	6.11
Road Network Capacity	6.12
Parking	6.13
Freight	6.14
Lifetime Neighbourhoods	7.1
An Inclusive Environment	7.2
Designing Out Crime	7.3
Local Character	7.4
Public Realm	7.5
Architecture	7.6
Location and Design of Tall Buildings	7.7
Heritage Assets and Archaeology	7.8
Heritage-Led Regeneration	7.9
London View Management Framework	7.11
Implementing the London View Management Framework	7.12
Safety, Security and Resilience to Emergency	7.13
Improving Air Quality	7.14
Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes	7.15
Protecting Open Space and Addressing Deficiency	7.18
Biodiversity and Access to Nature	7.19
Geological Conservation	7.20
Trees and Woodlands	7.21
Blue Ribbon Network	7.24
Increasing the Use of the Blue Ribbon Network for Freight Transport	7.26
Blue Ribbon Network: Supporting Infrastructure and Recreational Use	7.27
Restoration of the Blue Ribbon Network	7.28
The River Thames	7.29
Implementation	8.1
Planning Obligations	8.2
Community Infrastructure Levy	8.3
<b>Core Strategy (April 2009)</b>	
Sustainable Development	CP 1
Reducing Carbon Emissions	CP 2
Climate Change - Adapting to the Effects	CP 3
Biodiversity	CP 4
Sustainable Travel	CP 5
Waste	CP 6
Maintaining and Improving the Local Environment	CP 7
Town and Local Centres	CP 8
Open Land and Parks	CP 10
River Thames Corridor	CP 11
Opportunities for All (Tackling Relative Disadvantage)	CP 13
Housing	CP 14

Affordable Housing	CP 15
Local Services/Infrastructure	CP 16
Health and Well-being	CP 17
Education and Training	CP 18
Local Business	CP 19
Visitors and Tourism	CP 20
<b>Development Management Plan (November 2011)</b>	
Sustainable Construction	DM SD 1
Renewable Energy and Decentralised Energy Networks	DM SD 2
Retrofitting	DM SD 3
Adapting to Higher Temperatures and Need for Cooling	DM SD 4
Living Roofs	DM SD 5
Flood Risk	DM SD 6
Sustainable Drainage	DM SD 7
Flood Defences	DM SD 8
Protecting Water Resources and Infrastructure	DM SD 9
Water and Sewerage Provision	DM SD 10
Other Open Land of Townscape Importance	DM OS 3
Biodiversity and New Development	DM OS 5
Public Open Space	DM OS 6
Children's and Young People's Play Facilities	DM OS 7
Sport and Recreation Facilities	DM OS 8
Floodlighting	DM OS 9
Thames Policy Area	DM OS 11
Local and Neighbourhood Centres and Areas of Mixed Use	DM TC 2
The Evening Economy	DM TC 5
Conservation Areas - Designation, Protection and Enhancement	DM HD 1
Conservation of Listed Buildings and Scheduled Ancient Monuments	DM HD 2
Buildings of Townscape Merit	DM HD 3
Archaeological Sites	DM HD 4
War Memorials	DM HD 6
Views and Vistas	DM HD 7
Housing Mix and Standards	DM HO 4
Housing to Meet Specific Community Needs	DM HO 5
Delivering Affordable Housing	DM HO 6
Encouraging New Social Infrastructure Provision	DM SI 1
Development for Offices, Industrial, Storage and Distribution Uses	DM EM 1
Retention of Employment	DM EM 2
Matching Development to Transport Capacity	DM TP 1
Transport and New Development	DM TP 2
Enhancing Transport Links	DM TP 3
Integration of Different Types of Transport and Interchange Facilities	DM TP 4
Taxis and Private Hire Vehicles	DM TP 5
Walking and the Pedestrian Environment	DM TP 6
Cycling	DM TP 7
Off Street Parking - Retention and New Provision	DM TP 8
Design Quality	DM DC 1
Layout and Design of Mixed Use Schemes	DM DC 2
Taller Buildings	DM DC 3
Trees and Landscape	DM DC 4
Neighbourliness, Sunlighting and Daylighting	DM DC 5
Balconies and Upper Floor Terraces	DM DC 6
Planning Application Checklist	DM DC 9
<b>Publication Local Plan (January 2017)</b>	
Local Character and Design Quality	LP 1
Building Heights	LP 2
Designated Heritage Assets	LP 3
Non-Designated Heritage Assets	LP 4
Views and Vistas	LP 5

Appendix C - Planning Policy Matrix

Archaeology	LP 7
Amenity and Living Conditions	LP 8
Floodlighting	LP 9
Local Environmental Impacts, Pollution and Land Contamination	LP 10
Green Infrastructure	LP 12
Other Open Land of Townscape Importance	LP 14
Biodiversity	LP 15
Trees, Woodlands and Landscape	LP 16
Green Roofs and Walls	LP 17
River Corridors	LP 18
Climate Change Adaptation	LP 20
Flood Risk and Sustainable Drainage	LP 21
Sustainable Design and Construction	LP 22
Water Resources and Infrastructure	LP 23
Waste Management	LP 24
Development in Centres	LP 25
Social and Community Infrastructure	LP 28
Education and Training	LP 29
Health and Wellbeing	LP 30
Public Open Space, Play Space, Sport and Recreation	LP 31
New Housing	LP 34
Housing Mix and Standards	LP 35
Affordable Housing	LP 36
Housing Needs of Different Groups	LP 37
Employment and Local Economy	LP 40
Offices	LP 41
Industrial Land and Business Parks	LP 42
Visitor Economy	LP 43
Sustainable Travel Choices	LP 44
Parking Standards and Servicing	LP 45
Stag Brewery, Lower Richmond Road, Mortlake	SA 24

