

GREATER LONDON AUTHORITY

Development, Enterprise and Environment

Lucy Thatcher
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London Borough of Richmond upon Thames
Civic Centre
44 York Street
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Department: Planning
Your reference: 18/0547/FUL,
18/0548/FUL & 18/0549/FUL
Our reference: GLA/4172, 4172a &
4172b/01/KW
Date: 30 July 2018

Dear Ms Thatcher,

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

Former Stag Brewery, Mortlake
Local planning authority references: 18/0547/FUL, 18/0548/FUL & 18/0549/FUL

I refer to the copy of the above planning applications. On 30 July 2018, the Mayor considered a report on these proposals; reference GLA/4172, 4172a & 4172b/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not fully comply with the London Plan and draft London Plan, for the reasons set out in paragraph 99 of the above-mentioned report; but that the possible remedies set out in that paragraph of this report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Lucy Simpson, email lucysimpson@tfl.gov.uk, telephone 020 3054 7039.

Yours sincerely,

P.P.C. Cements

John Finlayson

Head of Development Management

cc Tony Arbour, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL
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Former Stag Brewery, Mortlake

in the London Borough of Richmond upon Thames

planning application nos. 18/0547/FUL, 18/0548/FUL and 18/0549/FUL

Strategic planning application stage 1 referral

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

The proposal

Application A: Detailed and outline application for comprehensive mixed use development of site to provide up to 667 residential units, 150 flexible assisted living/residential units, nursing home with 80 bedrooms, and up to 4664sq.m. of office, retail, cinema, hotel and community floorspace in buildings ranging from 3 to 8 storeys;
Application B: Detailed application for new 6-form entry secondary school with sixth form and redevelopment of playing fields;
Application C: Detailed application for highways and landscaping works at Chalkers Corner.

The applicant

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

Strategic issues

Principle of development: The redevelopment of this brownfield site for mixed use development is supported in line with London Plan and draft London Plan policies. The partial loss of playing fields and open space, in view of the education use and qualitative improvements to sports facilities provided by the development, is justified provided that comprehensive community use strategy is secured. (paras 18-36)

Housing: 17% affordable housing (taking into account the 150 flexible assisted living/residential units which must make an affordable housing contribution) is unacceptable in the context of the low value ex-industrial site and the significant uplift in value represented by the proposed development. The provision of affordable housing must be maximised in accordance with London Plan Policy 3.12, draft London Plan policies H6 and H7 and the Mayor's Affordable Housing and Viability SPG. (paras. 37-50)

Urban design: The overall approach to the masterplan, layout and approach to scale and massing is supported. Further amendments are required to secure appropriate residential quality and that the highest standard of urban design and architecture are carried forward to the outline phases. (paras. 56-63)

Climate change: Further clarifications and revisions are required to the energy assessment and the sustainable drainage strategy to ensure compliance with London Plan and draft London Plan climate change policies. (paras.66-72)

Transport: Reductions to the parking, further highways impact modelling, and a Healthy Streets assessment of the Chalker's Corner proposals are required. Financial contributions to bus service improvements, and conditions and planning obligations are required. (paras.73-94)

Recommendation

That Richmond Council be advised that the application does not yet comply with the London Plan and draft London Plan, for the reasons set out in paragraph 99 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 9 April 2018, the Mayor of London received documents from Richmond Council notifying him of three linked planning applications of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide the Council with a statement setting out whether he considers that the applications comply with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 Application A is referable under Categories 1A, 1B, 1C of the Schedule to the Order 2008. Application B is referable under Categories 1B and 3C of the Schedule:

- 1A - *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- 1B - *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— (c) outside Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C - *“Development which comprises or includes the erection of a building (c) of more than 30 metres high and is outside the City of London.”*
- 3C *“Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which— (a) is used as a playing field at the time the relevant application for planning permission is made; or (b) has at any time in the five years before the making of the application been used as a playing field.”*

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

4 Once Richmond Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

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

6 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

7 The 8.6 hectare site, occupied by the former Stag Brewery, is situated in Mortlake on the edge of the River Thames. It is bounded by the River Thames and houses to the north, Bulls Alley to the east, the A3003 Lower Richmond Road / Mortlake High Street to the south and Williams Lane to the west. Ship Lane runs through the site and connects Mortlake Green to the river. The site is currently occupied by 2-8 storey ex-brewery buildings and Watney's Sports Ground: private playing fields that were associated with the brewery.

8 The nearest section of the Transport for London Road Network (TLRN) is Chalker's Corner (the A316 Lower Richmond Road / A205 South Circular junction) approximately 300 metres west of the site. The A205 Upper Richmond Road is located approximately 500 metres south of the site.

9 The centre of the site is within approximately 800 metres north of Mortlake rail station. There is also one bus route (419) within walking distance, with stops located on Lower Richmond Road / Mortlake High Street. The site has a public transport accessibility level (PTAL) range of 1a to 2 on a scale of 1 to 6 where 6b is most accessible.

10 The Council has adopted a planning brief (published in 2011) which sets out the vision for the comprehensive development of this site.

Details of the proposal

11 Three linked planning applications have been submitted which together seek the comprehensive mixed use redevelopment of the site:

12 Application A (LPA ref:18/0547/FUL/GLA ref: 4172) is a hybrid application comprising detailed and outline elements. This application proposes to demolish the existing buildings and redevelop the site with buildings of 3 to 8 storeys, comprising up to 667 residential units, 150 assisted living units, a nursing/care home with up to 80 bedrooms, up to 4664 sq.m. of commercial, employment, leisure and community uses, and the provision of new public open space. The detailed component of the application is to the east of Ship Lane and seeks permission for buildings comprising 443 residential units and flexible commercial space.

13 Application B (LPA ref: 18/0548/GLA ref: 4172a) is a “drop-in” application proposing a new secondary school and sports facilities on land at the west of the application site.

14 Application C (LPA ref: 18/0549/GLA ref: 4172b) proposes highways works to Chalkers Corner, to the west of the main application site, to increase the capacity of this road junction and facilitate the delivery of the proposed development.

Case history

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

Strategic planning issues and relevant policies and guidance

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Richmond Core Strategy 2009, the Richmond Development Management Plan 2011, the Richmond Saved Unitary Development Plan 2005 and the 2016 London Plan (Consolidated with Alterations since 2011).

17 The following are relevant material considerations:

- The National Planning Policy Framework (July 2018) and National Planning Practice Guidance.
- Draft London Plan (consultation draft December 2017), which should be taken into account on the basis described in the NPPF.
- The Richmond draft Local Plan – publication version (February 2017)
- Richmond Council’s Stag Brewery Planning Brief 2011.
- Principle of development *London Plan*
- Playing fields *London Plan*

- Housing/affordable housing *London Plan; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Affordable Housing and Viability SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

Principle of development

18 The former Stag Brewery ceased operations in 2015. The site has no strategic land use designations and it is not designated as a local employment or industrial site. Given that the majority of the site (other than the sports ground) is occupied by buildings of an industrial nature, however, the site is considered as a "non-designated industrial site" in the context of draft London Plan policies E4 and E7.

19 Richmond Council's adopted and emerging development plan policies have promoted the redevelopment of the site for a mix of uses for a number of years. The Council's adopted Development Management Plan establishes the whole site as being within an "Area of Mixed Use" and its saved 2005 UDP policies define the eastern part of the site (which accommodates the larger brewery buildings) within Site Allocation S4 – "conversion and part redevelopment".

20 In 2011, the Council adopted a planning brief for the site which outlines development opportunities for the comprehensive redevelopment of the wider site (including land to the west of Ship Lane) to include residential-led mixed use development and the provision of a primary school.

21 More recently, Richmond Council's emerging Local Plan defines the whole of the main application site within an enlarged site allocation SA24. This site allocation states that the Council will support the comprehensive redevelopment of this site to provide a new village heart and centre for Mortlake, with the provision of a new 6-form entry secondary school and sixth form now required. Residential, commercial, river-related and community uses are envisaged as well as sport and leisure uses, including the retention and/or reprovision and upgrading of the playing field.

Residential uses

22 Policy H1 'Increasing Housing Supply' and Table 4.1 of the draft London Plan sets Richmond an annualised average housing completion target of 811 units (increased from 315 in the current London Plan) per year between 2019/20 and 2028/29. The site is allocated for residential-led development in Richmond Council's emerging local plan. The redevelopment of the site including up to 817 residential units would contribute positively to London Plan and draft London Plan housing targets and is supported.

Non-residential uses

23 The existing site contains 35,402sq.m. of Class B1 and B2 industrial and office space. Excluding the school, the application proposes up to 4,664 sq.m. of non-residential space (Use

Classes B1, A1-A4, and D1), including up to 2,000 sq.m. of Class B1 space, up to 6,500 sq.m. of retail space and 1,148 sq.m. of Class D1 community floorspace.

24 London Plan Policy 4.4 'Managing Industrial Land and Premises' provides a strategic aim for boroughs to adopt a rigorous approach to industrial land management, but recognises that managed release may be required to provide other uses in appropriate locations. Policy E4 'Land for industry, logistics and services to support London's economic function' of the draft London Plan identifies that sufficient land and premises need to be retained for industrial and related functions, and Table 6.2 identifies that Richmond needs to retain capacity. Policy E7 'Intensification, co-location, and substitution...' of the draft London Plan supports mixed use developments on non-designated industrial sites where there is no prospect of the site being used for industrial purposes; it has been allocated for mixed use in a development plan; industrial, storage or distribution space is re-provided; or where suitable alternative accommodation is available, and subject to relocation support.

25 As outlined above, Richmond Council's local policies establish this site within a mixed use area and its emerging local plan allocates the site for town centre, residential and community uses to support a new village centre. Noting the specialist nature of the existing brewery operations, and the uses identified in the Council's site allocation, the provision of 4,664 sq.m. of commercial floorspace to replace the B1 and B2 floorspace on the site, is acceptable and supported.

Development on playing fields

26 The proposal involves the redevelopment of Watney's Sports Ground, which comprises of two existing youth-sized grass sports pitches in private ownership (having formerly been used by the brewery for use by employees). There is no public access to the sports pitches, but they are used by the youth division of Barnes Eagles Football Club, as well as Thompson House School and St Mary Magdalen School, with total usage by these three groups of approximately 111 days a year.

27 The existing playing pitches are designated as local open space (Other Open Land of Townscape Importance (OOLTI)) in Richmond Council's Local Plan. The proposed secondary school would be partly built on this open space and part of the open space would become the sports facilities for the school. As such the proposals would involve the loss of the grass pitches and the replacement with one full-sized sports pitch. The remainder of the space to the south of the site would be landscaped to provide a publicly accessible park.

28 The protection of playing fields, and sports and recreational land and buildings is set out in the NPPF under paragraph 74, which states that these should not be built on unless: an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or, the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or, the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

29 London Plan Policy 7.18 and Policy G4 of the draft London Plan resist the loss of protected open spaces unless equivalent or better quality provision is made within the local catchment area. London Plan Policy 3.19 and Policy G5 of the draft London Plan resist proposals that result in a net loss of sports and recreation facilities, including playing fields.

30 Through pre-application discussions with Richmond Council and GLA officers, the applicant has sought to amend and refine its proposals with respect to the positioning of the

school and the re-provision of open space. The amendments have responded positively to the requirement to make qualitative improvements to the remaining sports provision in compensation for the loss of land used as playing fields. However, it is acknowledged that the proposals result in the loss of the two grass playing pitches, reducing the area of the playing fields by 0.48 hectares.

31 The proposals include the provision of one full-sized sports pitch to replace the two youth-sized grass pitches. The proposed sports pitch would be surfaced with a 3G playing surface and would be floodlit. Richmond Council has identified a need in the borough for 3G pitches, and the resurfacing and lighting would enable the more intensive and all-weather use of the replacement sports pitch. In addition, the school development will include new indoor and outdoor sports facilities for other sports, including a multi-use games area and a sports hall with changing rooms. It is intended that all of these facilities will be open for community use outside of school hours.

32 Sport England's guidance includes exception tests outlining the circumstances in which the loss of playing fields can be justified. To meet exception test E5, it needs to be demonstrated that the proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of the playing field. Sport England has responded to consultation on the current planning application. In summary, Sport England consider that the proposals could meet exception test E5, but that further details of the sports provision and community use agreement are required to confirm this. In particular, Sport England require confirmation that the applicant will enter into a s106 obligation to ensure that the youth division of Barnes Eagles football club is provided with an alternative pitch during construction works and that this club has access to the 3G pitch when constructed, plus a second pitch to off-set the loss of the two youth pitches.

33 GLA officers acknowledge that the proposals offer new sports facilities of potentially greater benefit to sport and the local community than the existing private grass pitches. The loss and replacement of the playing fields with improved facilities is thus acceptable in the context of London Plan policies and the NPPF. However, in common with Sport England, GLA officers share concern about the displacement and potential disbanding of a local youth football team, as this would be of demonstrable detriment to community sports provision. Support for the proposals is therefore only offered on the basis that alternative provision is secured for this team, and also that a robust and comprehensive community use strategy is secured in any planning permission which allows a significant amount of daily public access to the sports facilities, including changing facilities. These obligations must be discussed with the GLA prior to referral of the applications to the Mayor at Stage 2.

Education facilities

34 The provision of a new secondary school is strongly supported by national and London Plan policy. Paragraph 72 of the NPPF states that "the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities." To achieve this objective, the NPPF encourages local planning authorities to adopt an approach (to meeting this requirement and to development that will widen choice) that is proactive, positive and collaborative.

35 London Plan Policy 3.18 (Education Facilities) states that "proposals for new schools, including free schools, should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the use of planning conditions or obligations." Additionally, the Mayor's Social Infrastructure SPG states that new

sites for schools should be secured to meet additional educational need, particularly in those areas defined in the London Plan as Opportunity Areas.

36 Whilst the provision of a new school at the site is thus strongly supported in strategic planning terms, it is noted that local residents’ groups have questioned the Council’s evidence supporting the need for a new secondary school in this location. The Council should respond fully to these points to ensure that there is a robust and evidenced case for a secondary school, as the size requirement of a secondary school has an impact on both the loss of playing fields referred to above, and the traffic and transport impacts arising from the development, which are referred to below.

Housing

37 The indicative development schedules show that up to 817 new homes would be delivered on the site (comprising 667 conventional residential units and 150 flexible units for either assisted living or residential use). The detailed element of the application proposes 443 residential units. Table 1 below sets out the proposed indicative residential schedule for the 667 conventional residential units, noting that the 150 flexible units are not included in this total:

Unit type	Affordable rent		Intermediate		Private market		Total (%)	
	units	Hab rooms	Units	Hab rooms	Units	Hab rooms	Units	Hab rooms
One-bedroom	14	28	7	14	76	152	97 (14.5%)	194
Two-bedroom	36	108	21	63	262	786	319 (48%)	957
Three-bedroom	50	200	3	12	171	684	224 (33.5%)	896
Four-bedroom	7	35	0	0	20	100	27 (4%)	135
Total	107	371	31	89	529	1,722	667**	2182**
% by hab room*	21%				79%			

Table 1: Proposed indicative residential schedule (outline and detailed elements combined)

*Estimated figure based on indicative unit mix

**Total does not include the 150 flexible assisted living/residential units.

Affordable housing

38 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 of the draft London Plan identifies a minimum threshold of 35% (by habitable room) affordable housing with a threshold of 50% for sites on industrial land. Applications providing a relevant level of affordable housing, with an appropriate tenure split, without public subsidy, and meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, can follow the ‘Fast Track Route’ set out in the SPG; this means that they are not required to submit a viability assessment or be subject to a late stage viability review. At the local level, Richmond

Council's Core Strategy Policy CP15 sets a strategic target of 50% of all new housing to be affordable, with a tenure split of 80% social rent and 20% intermediate.

39 The applicant is currently proposing that one building within the scheme provides affordable accommodation, with a total of 138 affordable units (107 rented units and 31 shared ownership units). This equates to 20% by unit or 21% by habitable room based on the indicative schedule of accommodation for the 667 traditional residential units. It is important to note, however, that the applicant has not included the 150 flexible extra care/residential units in this total. As explained further in paragraphs 48-49 below, GLA officers consider these units to be Class C3 residential units, and if these units are included in the total proposed residential unit numbers, the affordable housing provision would amount to 17% by unit.

40 As the proposal does not meet the requirements of the draft London Plan threshold approach, nor Richmond Council's strategic policy, it must be determined under the 'viability tested route' and as such, the applicant has produced a viability assessment, which is being rigorously assessed by GLA and Council officers. The applicant's viability assessment concludes that no affordable housing is viable within the scheme, but the offer of 21% is being made on a growth basis. However, GLA officers have key concerns with the viability evidence as presented by the applicant as set out below.

41 The benchmark land value presented in the applicant's assessment, whilst described as an existing use value, is in fact an alternative use value as it envisages comprehensive redevelopment of the existing industrial buildings to provide employment use. In addition, a 20% premium has been applied to this alternative use. However, GLA officers are of the view that it is not appropriate to apply an alternative use value to benchmark the site. There is no extant planning permission for the redevelopment envisaged, and no guarantee that this would be granted given that the site is allocated for mixed use development. An existing use value, based on the re-use of the buildings on the site, should be the basis of a benchmark land value assessment. Additionally, it is not appropriate to apply a premium to the land in an alternative use scenario, as the resulting uplift in value already takes account of this premium.

42 It is noted that the Council's independent viability assessment, which advocates an existing use value plus premium to benchmark the land value, results in a valuation of £32 million instead of the £52 million as assessed by the applicant, and GLA officers consider this approach to be correct.

43 The market housing values put forward by the applicant are understated, particularly given the place making/ regenerative nature of the development and viability testing showing the results with average values increased to £1000p.sf. and £1100p.sf. should be provided. The affordable housing values are also understated in the applicant's assessment and should be market tested. In terms of costs, the applicant's stated build costs, contingency, professional fees and profit levels for market housing are all considered to be excessive.

44 The basement parking proposed has a disproportionate impact on viability, as on the applicant's evidence there would be a £64 million difference between its cost and value. This is having an unacceptable impact on the ability of the scheme to deliver the fullest contribution towards affordable housing and must be addressed. Additionally, further effort could be made to "value engineer" the scheme to optimise viability, e.g. the provision of a gym is also costing more to provide than the value it generates and should be reviewed, and greater efficiency of the internal design layout of the buildings could improve viability.

45 The applicant has stated that it would not accept late stage viability reviews. Given the low level of affordable housing, the fact that the application does not currently meet the threshold approach which would enable the GLA to waive the requirement for a late stage review, the significant uplift in values that would be represented by this regenerative scheme, and that the

viability evidence does not currently demonstrate that the scheme is delivering more than the maximum viable amount of affordable housing, the absence of a late stage review would be unacceptable in the context of draft London Plan Policy H6 and this must be secured.

46 Whilst the tenure split has been modelled on Richmond Council's local policy requirements of 80/20 in favour of affordable rent, the Mayor seeks to ensure a minimum of 30% low cost rent and a minimum of 30% intermediate accommodation within the affordable housing provision. As such, revisions to the tenure split must be explored in order to increase the overall quantum of affordable housing.

47 In conclusion, the current offer of 17% affordable housing is unacceptable in the context of the low value ex-industrial site and the significant uplift in value represented by the proposed development. Having reviewed the applicant's viability evidence, GLA officers conclude that more affordable housing is viable in the scheme, and will work with the applicant to ensure that the provision of affordable housing is maximised.

Class C2/C3 use

48 Policy H15 of the draft London Plan and the Mayor's Housing SPG (paragraph 3.7.4) both make a clear distinction between C2 and C3 uses in respect of specialist older persons housing. Draft Policy H15 states that sheltered accommodation and extra care accommodation should be considered as C3 housing. More specifically, paragraph 4.15.3 defines extra care accommodation as: self-contained residential accommodation and associated facilities, designed and managed to meet the needs and aspirations of older people, and which provides 24-hour access to emergency support. Furthermore, a range of facilities are normally available such as a resident's lounge, laundry room, a restaurant, or meal provision facilities, classes, and as base for health care workers. This definition fully conforms with the design of the units and applicant's description of the extra care accommodation proposed. Therefore, the proposed extra care accommodation must be treated as Class C3 use, rather than C2 as stated in the description of the proposal.

49 In accordance with Policy H15 of the draft London Plan, specialist older persons housing comprising extra care or sheltered accommodation (Use Class C3) must deliver affordable housing in accordance with draft London Plan Policies H5 and H6, and this must be addressed in the viability assessment.

Vacant building credit

50 It is noted that the applicant is seeking to claim vacant building credit (VBC) to reduce the policy requirement for affordable housing from 50% to 26%. As stated in the Mayor's Affordable Housing & Viability SPG, the Mayor's view is that it is not appropriate in most circumstances to apply the VBC in London, as it rarely provides an incentive for brownfield sites to come forward for redevelopment which are otherwise prevented from doing so due to affordable housing requirements. In this case, whilst brewery operations ceased in 2015, the site has been allocated for redevelopment in the Council's development plan since 2005. The 2011 adopted planning brief sets out clear parameters and guidance for mixed use redevelopment, including affordable housing requirements, which will have been taken into account in transactions between the land owner and the developer in this case. There is not, in GLA officers view, any evidence to suggest that the site would not have come forward for redevelopment without the application of VBC and it is not appropriate to apply VBC in this case.

51 In any case, the applicant's current affordable housing offer is less than the reduced level of affordable housing that would represent the VBC discount and the applicant's viability evidence is being rigorously tested as explained above. The application must maximise the provision of

affordable housing in accordance with London Plan Policy 3.12, and 26% should not be seen as the “cap” to affordable housing provision, whether or not VBC is appropriately applied.

Mix of units

52 London Plan Policy 3.8 encourages a full range of housing choice. Draft London Plan Policy H12 states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes; and for low cost rent, boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. The proposed indicative residential schedule (presented in table 1 above) includes a mix of units of one to four bedrooms, with a significant proportion (37%) of the total units being three-bedroom or larger, and 53% of the affordable rented units being 3+ bedroom units. As such, the unit mix is acceptable in strategic terms, although as there is currently a significant proportion of larger units in the scheme and a low proportion of affordable housing, the applicant should explore whether a greater proportion of smaller units in the scheme would increase overall affordable housing provision.

Residential standards and children’s play space

53 All dwellings in the detailed application element have been designed to meet or exceed the minimum space standards established by London Plan Policy 3.5 (Table 3.3). The sizes of the units within the outline application element will be determined at the reserved matters stages, but the residential floorspace and indicative housing mix has assumed full compliance with space standards. Given the GLA’s view that the 150 extra care units must be treated as Class C3 residential dwellings, it must be confirmed that these units comply with relevant space requirements and housing standards as set out in the Housing SPG.

54 With respect to children’s play space, London Plan Policy 3.6 and draft London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Mayor’s Play and Recreation SPG and draft London Plan Policy S4 expect a minimum of 10 sq.m per child to be provided in new developments.

55 Based on the proposed indicative housing mix, the child yield would be approximately 281 children, generating a requirement for 2,810 sq.m. of playspace, with 1,400 sq.m. required for under-fives. A playspace strategy has been prepared, with landscaping plans identifying doorstep informal playspace for under-5s and older children that exceed the minimum requirements. These spaces would comprise landscaped areas, lawns, play elements and equipment provided within the courtyards, central gardens and landscaped areas by the riverside. Doorstep play spaces would be available within 100 metres of all dwellings and play space for older children would be a maximum of 800 metres from dwellings. The playspace strategy meets requirements and is supported in line with London Plan Policy 3.6 and draft London Plan Policy S4. Details of the play spaces must be secured by condition.

Urban design

Routes, connections and layout

56 The redevelopment of this large, currently inaccessible site close to the River Thames has the potential to significantly improve the connectivity and legibility of the area by creating new routes through the site towards the river, and activating Mortlake High Street and the river front. Through the pre-application process, the applicant has responded positively to GLA officers’ advice that the main route through the site should be straight and wide, providing clear views of the River. The proposals incorporate a wide, straight linear park linking Mortlake Green

to the River, enhancing visual links with the riverside. The creation of two wide links into the new east-west route from Mortlake High Street also enhance the permeability of the site and the legibility of the new high street.

57 The scheme proposes to reinstate a historic high street running east-west through the site. This route creates a fine urban grain and a new village centre for Mortlake. The success of this part of the scheme is dependent on the ability to activate the public realm with ground floor uses. The submitted drawings generally show good activation with commercial frontages on to the street, and around the public square. However, the inclusion of a vehicular access ramp within Building 10 creates a long dead frontage on the northern elevation at ground floor level, and this fails to promote a fully active high street. The design of this block should be amended.

58 The retention and conversion of the historic locally listed buildings within the scheme is welcomed (as is their inclusion in the detailed element of the application). The use of these heritage assets to frame the public squares would have a positive impact on both the setting of the existing buildings and the character of the proposed public spaces. The interventions proposed to the facades of these buildings would be minimal, sensitively retaining the historic character of the buildings whilst providing additional activation to the public squares and the riverfront.

59 The positioning of the school to the eastern side of the existing playing fields allows the retention of a full-sized playing pitch and the creation of public open space. Whilst Williams Lane would not be activated, the existing condition of the open space fronting the road would be maintained and this is an acceptable townscape response to development at the western part of the site.

Residential quality

60 The general residential quality and layout is welcomed, however there are detailed design issues which should be considered further by the applicant:

- Front doors to ground floor units should be explored further. Whilst private amenity spaces/front gardens are provided it is unclear whether this space can be accessed from the street via individual entrances to create strong street frontages.
- A number of north-facing single aspect units are proposed in Building 03/07, and there are opportunities to maximise dual aspect units within these blocks. It is also noted that some blocks provide more than eight units per core which, in combination with lack of natural light and ventilation in corridors, is not fully justified. The applicant should address these issues.
- In some cases balconies are accessed from bedrooms. Balconies should be accessed from living spaces wherever possible.
- Building 04 provides no private amenity space and balconies must be added on this block.

Height, massing and architecture

61 The masterplan sets a prevailing block height of 6-7 storeys including 8 storey marker elements, with lower rise blocks of 3-5 storeys south of the central spine route. The height strategy responds to the parameters set within the Council's planning brief and the need to preserve the setting of the surrounding conservation areas. The applicant's townscape and views analysis indicates that the proposed development will bring about a high degree of change in certain views, particularly in views of the river frontage. However, the high quality of the proposed buildings, which reference the retained 8-storey Maltings building to create a strong

and attractive river frontage, would ensure that the development has a positive impact on the local townscape.

Density

62 The residential density of the site, excluding the non-residential development and including the assisted living/residential units in the calculation, is approximately 139 units per hectare. This is within the appropriate density range for a site with a PTAL of 2 as set out in London Plan Policy 3.4 and Table 3.2, and is below the trigger point for independent design review as stated in Policy D6 of the draft London Plan. Whilst these measures indicate that the density is appropriate in principle, the design and quality of the development has been scrutinised by officers, and is found broadly acceptable subject to amendments set out above.

Outline permission

63 Given the proposed outline nature of the scheme, a robust design code will be essential to secure key aspects of both the residential and public realm quality of the scheme. The submitted design codes require strengthening both in terms of the language used and the following details:

- Residential quality standards as set out in the London Housing Design Guides must be secured. Particular care should be taken to optimise number of dual aspect units considering that the orientation of a number of blocks could result in a high proportion of single aspect north facing units.
- The parameter plans do not currently specify minimum extents of active frontage and this must be secured.
- Codes for articulation of the façade should be further detailed, and the application of these should be demonstrated through indicative proposals.
- Images of good / bad practice should be annotated to clarify what is expected of the detailed application.

Inclusive design

64 Policy D3 'Inclusive design' of the draft London Plan and London Plan Policy 7.2 seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). The application is accompanied by an access statement, which covers the principles of inclusive design, approaches and entrances, and landscaping. Where changes in level are required, slopes with a gradient no greater than 1:22 are proposed. Approaches to buildings will be level and accessible lifts will be provided throughout the development. A detailed access statement should be secured by condition in any planning approval.

65 In accordance with London Plan Policy 3.8, all of the residential units will meet M4(2) standards and 10% of the units will be wheelchair accessible or adaptable, conforming to M4(3) standards. Accessible dwellings will be provided across all dwelling types and tenures, which is welcomed.

Climate change

Energy

66 Based on the energy assessment submitted, compared to a 2013 Building Regulations compliant development, an on-site reduction equivalent to an overall saving of 21% of CO₂ per year in regulated emissions is expected for the residential elements, and 21% for the non-domestic elements. This falls short of the on-site carbon targets set within Policy 5.2 of the London Plan and Policy SI2 of the draft London Plan. The domestic elements are required to meet the zero carbon reduction target. The applicant must consider the scope for additional measures aimed at achieving further carbon reductions prior to ensuring that any carbon shortfall is met through a contribution to the borough's offset fund. Further clarifications and justifications for the proposed energy strategy are also required.

67 In particular, multiple energy centres are proposed within the scheme, and as discussed at the pre-application stage energy centres must be minimised where inherent constraints are not present. Further justification must therefore be submitted to support the multiple energy centre proposals. Taking into account the proposed phasing of the development, the applicant must further investigate how the number of energy centres can be minimised.

68 Additionally, further information on the CHP should be provided including the total space heating and domestic hot water (DHW) demand of the development (MWh annually) and broken down per use, the anticipated running hours and the proportion of heat met by the CHP. Given the site's scale and density, and in line with the GLA's guidance, a CHP engine is not considered the most appropriate technology for developments of less than 500 units. The applicant should therefore ensure that a single CHP engine will supply the entire site (Application A) or consider other more appropriate heating technologies for the site.

69 Prior to establishing an appropriate off-set contribution, further information and revisions are required before the proposals can be considered acceptable and the carbon dioxide savings verified. Full details have been provided to the applicant.

Flood risk, drainage and water use

70 The proposed development complies with London Plan Policy 5.12 (and draft Policy SI12) relating to flood risk, however conditions relating to the need for increased flood defences, inclusion of property level protection measures and the future Ship Lane flood gate will be required, in agreement with the Environment Agency.

71 The scheme is not currently proposing to achieve greenfield run-off rates and the presence of the large basement is a barrier to optimising the sustainable drainage of this site. Further justification is required on the drainage strategy to ensure compliance with London Plan Policy 5.13 and draft Policy SI13. The general approach of relying on underground attenuation rather than maximising green infrastructure-based and above ground SuDS strategies through the integration with the landscaping proposals is not acceptable. In addition to this the lack of water quality treatment for the section of the site directly drainage to the River Thames is not acceptable.

72 The proposed development is compliant with London Plan Policy 5.15 (and draft Policy SI5) for water use, which should be maintained through detailed design. Detailed comments have been provided to the applicant.

Transport

Vehicular Site Access

73 Vehicular access to the development site is limited by the presence of the River Thames to the north and the railway line to the south. Vehicles will predominantly access the site via Lower Richmond Road/ Mortlake High Street from Chalkers Corner or from Sheen Lane via the A205 Upper Richmond Road. It is noted that Sheen Lane experiences significant congestion and delays due to long barrier down time at the level crossing at Mortlake Station.

Car parking

74 A total of 679 car parking spaces are proposed on site. Of the total spaces proposed, 15 spaces are proposed for the secondary school and 479 for the residential use equating to a car parking ratio of 0.72 spaces per unit. 11% of the residential spaces will be allocated for Blue Badge car parking. Whilst the residential car parking provision will meet the London Plan and draft London Plan standards, further reductions in parking would help to minimise additional impact on the already congested nature of the surrounding highway network.

75 In addition to the residential car parking, it is proposed to provide 200 non residential spaces, including 25 disabled spaces. The levels of non-residential car parking provision is excessive, unnecessary, and would not accord with the draft London Plan. Significant reduction in the non-residential parking provision is therefore required.

76 Electric vehicle charging points (EVCP) including passive provision will be provided in accordance with the London Plan. The number of car club spaces to be provided should be confirmed, as well as the securing of two years free car club membership for all new residents without a car parking space.

77 A full Parking Management Plan should be secured through the s106 agreement and should detail how the car parking will be designed and managed, with reference to Transport for London guidance on car parking management and car park design.

78 An extension of the existing CPZ's to include the all roads up to Chalkers Corner should also be considered, along with future residents' exemption from parking permits, to be secured through an appropriate legal mechanism.

Chalkers Corner Proposals

79 Given the capacity constraints created by the railway level crossing on Sheen Lane, Chalkers Corner will be the main highway access to the development site. Chalkers Corner suffers from significant congestion during weekday peak periods. It is therefore proposed to improve the operation of this junction in order to accommodate the additional demand generated by the development. Whilst the applicant has worked with TfL to develop the scheme, there are reservations that the current scheme fails to deliver fully on TfL's Healthy Streets agenda by improving pedestrian and cycle capacity whilst reducing bus journey times. Given the scale of the scheme a Healthy Streets Assessment of the design must be undertaken, and further improvements must be discussed with TfL and GLA officers.

80 It is noted that some land required to deliver the proposed Chalkers Corner scheme falls outside the ownership of TfL or the applicant. It must be demonstrated how the highway mitigation proposed is deliverable, or else how the highway impacts of the proposed development would be mitigated should the land not be acquired.

Highway impact

81 The development is expected to generate 427 two way vehicle trips in the AM peak hour and 250 during the PM peak hour including HGV trips.

Strategic Assessment

82 At the request of TfL, strategic modelling has been undertaken using TfL's South London Highway Assignment Model (SoLHAM), to assess the potential strategic transport impacts associated with the proposed redevelopment within a 2 kilometre radius of the site. The outputs of the strategic modelling indicate that the proposed development would not have a major impact on the surrounding wider road network. However, further analysis is required to enhance the base strategic models to provide outputs more accurately aligned with recently collected signal and flow data. Once this exercise is complete local modelling analysis may need to be revisited using improved flow data. It is important to note that the strategic modelling was not used to assess the operation of individual junctions.

Local Highway Impact Assessment

83 In addition to the strategic modelling, detailed local junction modelling has also been undertaken to assess the impact of the development on the following signalised junctions:

- Chalkers Corner; and
- A205 Upper Richmond Road / Sheen Lane junction.

84 The Linsig models produced for both Chalkers Corner and the A205 Upper Richmond Road / Sheen Lane junction have been developed in-line with TfL modelling guidelines. For Chalkers Corner the analysis suggests that the proposed design could accommodate the increase in demand as per the latest the strategic model outputs. For the A205 Upper Richmond Road / Sheen Lane junction, the analysis also suggests that the proposed development will have minimal impact in the future year scenario. However, as stated above further analysis is required on the strategic outputs to accurately inform the modelling conclusions.

Buses

85 The proposed development is predicted to generate 685 two-way bus trips in the AM peak hour of which 566 would be associated with the proposed secondary school. A further 258 two-way bus trips are predicted in the PM peak hour of which 90 would be secondary school trips.

86 TfL have undertaken a detailed assessment of the capacity of the existing bus routes which serve the site. The analysis has identified that whilst there is currently sufficient capacity to accommodate the existing levels of demand, additional buses would be required to accommodate the predicted level of demand generated by the secondary school and development. The uplift in demand would require 8 new double deck school services in the AM peak hour and a further 2 in the PM peak hour. In addition, 3 additional return journeys are required to accommodate the remaining development trips in both the AM and PM peak periods and are likely to enhance routes serving Hammersmith and Richmond town centre. Contributions are sought for 5 years to allow for passenger demand to build up. The total contribution requested would therefore be £735,000 x 5 years which equates to £3,675,000.

87 The TA also needs to provide the predicted number of bus trips for the PM school peak (15:00-16:00) so it can be ascertained if additional buses are required during this period.

88 During pre-application discussions TfL were asked to investigate diverting route 209 to the Stag Brewery site. Whilst this was not considered to be a viable option, TfL did request that an area of land which can accommodate standing space for three vehicles and driver facilities should be safeguarded in the south west corner of the secondary school site to allow for future route extensions. Although at this time no one specific route has been identified, an extensive review of the bus network in the vicinity of the site will be undertaken once the Hammersmith Bridge repairs have been completed. The provision of standing and driver facilities at this location will ensure any future extension is viable and cost effective. The safeguarded land should be secured through the s106, along with a lease agreement.

89 In order to facilitate the proposed development along Mortlake High Street and Lower Richmond Road, the applicant has proposed a number of alterations to bus stop locations along this corridor. Whilst TfL agreed the principle of these proposed changes, these will still be subject to receiving the detailed drawings of each bus stop location. The full costs to implement any changes to TfL's bus infrastructure will need to be met by the applicant.

Rail

90 Mortlake rail station and the trains which serve it are operated by South Western Railway (SWR). During the peak hours there are a total of 8 services per hour. The development is expected to generate 144 two way rail trips in the AM peak hour and 225 in the PM peak hour. Planned rail improvements on the "Windsor line" include increasing the capacity of trains into and out of Waterloo. In addition, Network Rail will be realigning platforms at Waterloo, including bringing the old International platforms into use, to enable all 24 platforms to be used from December 2018, which would allow an increase in reliability on this line.

Cycle Parking

91 A total of 981 cycle parking spaces are proposed for Application A, Development Area 1 and up to 857 spaces for Application A, Development Area 2. Further clarification is sought on the quantum used to calculate the cycle parking provision for the non-residential uses to ensure they are London Plan compliant. The TA also states that 71 long stay and 13 short-stay spaces will be provided for the proposed secondary school. This is well below the London Plan and draft London Plan minimum standards which would require 158 long-stay spaces. The applicant should also aspire to meet the draft London Plan standards for all uses.

A205 Upper Richmond Road / Sheen Lane junction

92 TfL are currently developing a scheme to address road safety and improve pedestrian and cycle facilities at the junction of Upper Richmond Road West with Sheen Lane and along the A205 Upper Richmond Road West between Sheen Lane and Priests Bridge Avenue. Given that the proposed development will generate additional vehicle, cycle and pedestrian movements through this junction, an appropriate contribution is sought towards the proposed scheme for the works at the Upper Richmond Road West / Sheen Lane junction.

S278 Agreement

93 Should the Chalker's Corner scheme be approved, a planning condition must require the developer to enter into a section 278 Agreement under the Highways Act 1980, with TfL for works on TfL's highway associated with the proposed scheme.

Travel Plan, Servicing and Construction

94 A final Travel Plan should be secured, enforced, monitored and reviewed as part of the s106 and the CLP and DSP should be secured by a condition. The applicant is encouraged to include more ambitious modal shift targets in the Travel Plans. Additionally, more details should be provided on the length of the construction programme, and to identify efficient and sustainable measures that will be undertaken during construction of the development.

Local planning authority's position

95 Council officers are currently assessing the details of the application. The application is expected to be considered at Committee in September 2018.

Legal considerations

96 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view.

97 Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

98 There are no financial considerations at this stage.

Conclusion

99 London Plan and draft London Plan policies on the principle of development; employment, housing and affordable housing, urban design; inclusive design; transport; and climate change are relevant to this application. The application does not yet comply with the London Plan and draft London Plan, for the reasons set out below:

- **Principle of development:** The redevelopment of this brownfield site for mixed use development is supported in line with London Plan and draft London Plan policies. The partial loss of playing fields and open space, in view of the education use and qualitative improvements to sports facilities provided by the development, is justified provided that comprehensive community use strategy is secured and that the proposals provide alternative facilities for Barnes Eagles football team.
- **Housing:** 17% affordable housing (taking into account the 150 flexible assisted living/residential units which must make an affordable housing contribution) is unacceptable in the context of the low value ex-industrial site and the significant uplift in value represented by the proposed development. GLA officers will work with the applicant to ensure that the provision of affordable housing is maximised in accordance with London Plan Policy 3.12, draft London Plan policies H6 and H7 and the Mayor's Affordable Housing and Viability SPG.

- **Urban design:** The overall approach to the masterplan, layout and approach to scale and massing is supported. Further amendments are required to secure appropriate residential quality and that the highest standard of urban design and architecture are carried forward to the outline phases.
- **Climate change:** Further clarifications and revisions are required to the energy assessment to verify the carbon savings proposed, and to ensure compliance with London Plan Policy 5.2 and draft London Plan Policy SI2. Revisions to the sustainable drainage strategy are required in line with London Plan Policy 5.13 and draft London Plan Policy SI13.
- **Transport:** Reductions to the parking, further highways impact modelling, and a Healthy Streets assessment of the Chalker's Corner proposals are required. Financial contributions to bus service improvements, and conditions and planning obligations are also required.

for further information, contact the GLA Planning Team:

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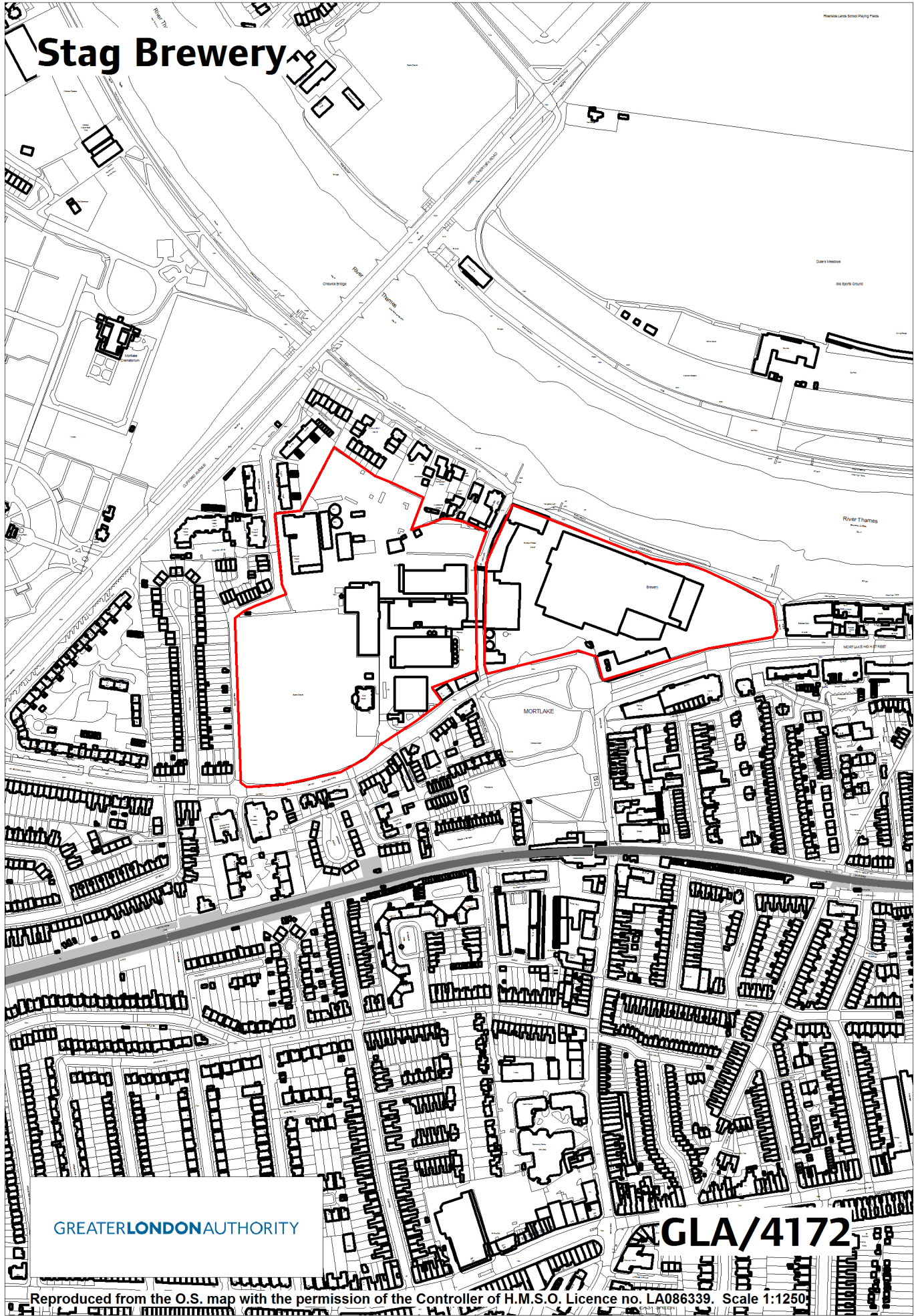
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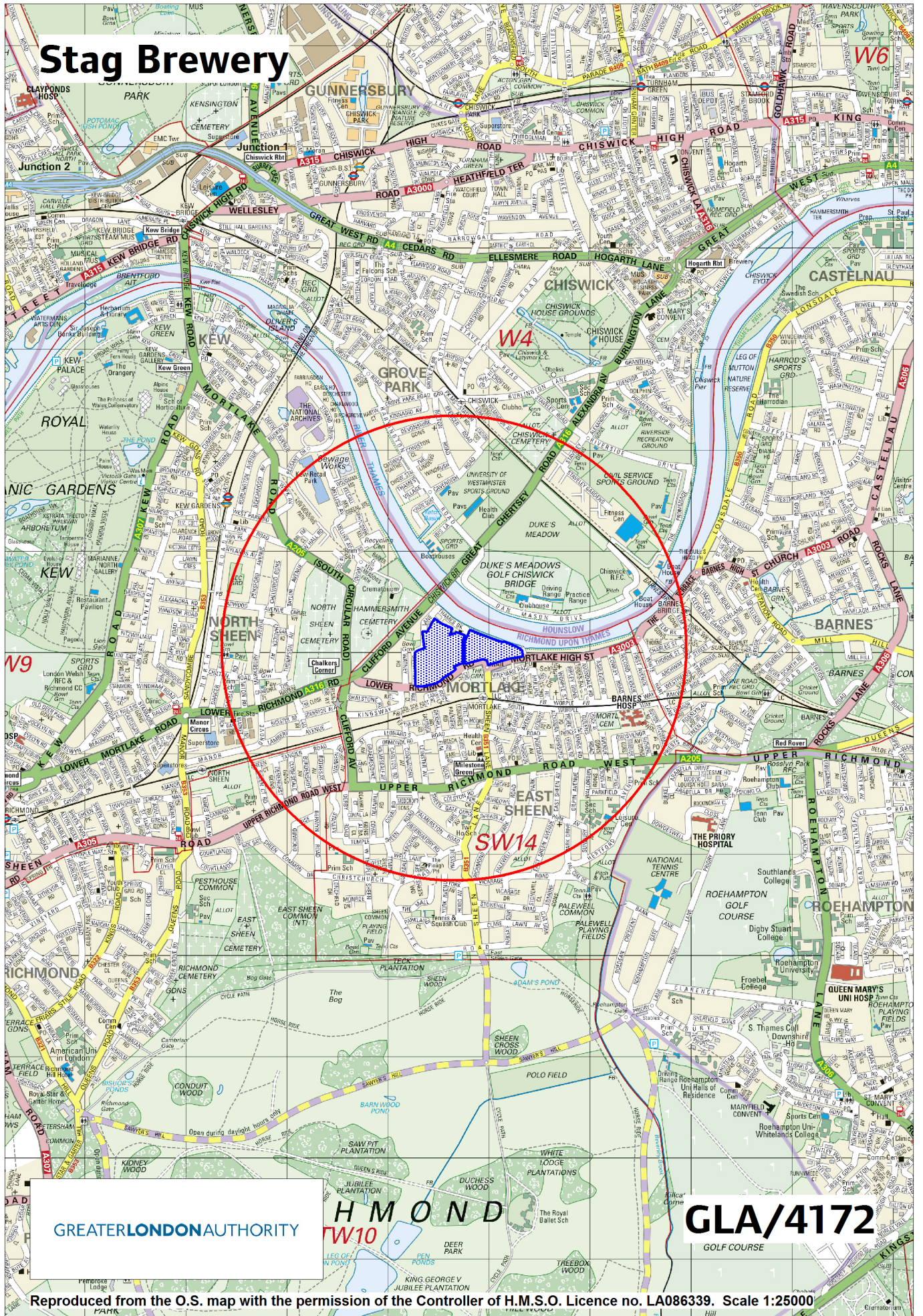
Stag Brewery



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