

FURTHER ADDENDUM TOWN PLANNING STATEMENT
THE FORMER STAG BREWERY, MORTLAKE
ON BEHALF OF RESELTON PROPERTIES LIMITED

July 2020



GERALDEVE

Further Addendum Town Planning Statement
The Former Stag Brewery, Mortlake

On behalf of: Reselton Properties Limited

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1 Executive Summary

- 1.1 This Further Addendum Town Planning Statement (“the Addendum Statement”) has been prepared by Gerald Eve LLP on behalf of Reselton Properties Limited (“the Applicant”) in support of amendments to 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”).
- 1.2 The amendments are submitted following the direction on 4 May 2020 by the Mayor of London (“the Mayor”) to take over the Applications and act as the local planning authority for the purposes of their determination. The Mayor’s direction followed a resolution by LBRuT at its Planning Committee on 29 January 2020 to be minded to approve two of the Applications and refuse one of the Applications. LBRuT officers had recommended approval of all three of the Applications.
- 1.3 The principles of the scheme remain as per the original Applications. A series of amendments are now proposed, which include providing up to an additional 437 residential units and an increase in the quantum of affordable housing of up to 30% (by habitable rooms) on Site. The increase in housing has been achieved through an increase in density and height in appropriate locations across the Site, amendments to the layout of some blocks, re-configuration of the internal spaces and the conversion of some previously non-residential uses to solely residential. The block footprints remain as per previously proposed with the exception of Blocks 18, 19, 20 and 21 (to the north west corner of the Site) and minor footprint changes to blocks 2, 3, 7, 8, 11 and 12 as a consequence of aesthetic refinements. A careful and well considered approach has continued to be adopted for the masterplan, and it is considered that the Revised Scheme will continue to deliver a scheme of high quality architecture that is appropriate for its context.
- 1.4 In response to the increase in residential units, as well as in response to ongoing discussions with statutory consultees, the Applicant is also proposing a range of other scheme amendments including reducing the size of the western basement, removing the ‘Care Village’ elements, removing the gym, amending the flexible use floorspace and location, amending other commercial uses and amending the tenure mix of blocks across the Site. Amendments are also proposed to the landscaping and cycle provision.

- 1.5 In the Call-In Direction, the Mayor has made clear that the current provision of affordable housing at 17.5% (on a habitable room basis)¹ is not acceptable. The Applicant's project team, including architects Squire & Partners, have carefully considered how the Site could be developed to provide an increased number of homes, optimising the use of brownfield sites, as well as a higher level of affordable housing whilst being appropriate for its context. Through a detailed design process, it has been concluded that it could be possible to increase the provision of affordable housing on Site to up to 30%. This requires amendments to the scheme, including the increase in the quantum of market residential units. This increase will greatly assist in delivering homes for Londoners, in line with the Mayor's ambitions. The precise quantum of affordable housing that can be supported will be the subject of further viability discussions with the Greater London Authority ("the GLA").
- 1.6 Application C was resolved to be refused by LBRuT at Committee on 29 January 2020. As a result, whilst the works proposed in Application C are still an available option, the Applicant has progressed alternative approaches for addressing and mitigating the impacts on surrounding highways, and these have been tested within the relevant substitution documents for Applications A and B. All of these options are subject to ongoing discussions and testing with the GLA and Transport for London ("TfL").
- 1.7 The amendments also seek to respond directly to other issues raised by the Mayor throughout application discussions, as well as LBRuT where feasible.
- 1.8 The Revised Scheme continues to deliver a wide ranging and significant package of public benefits to the new and existing residential communities in the local area. This package includes:
- i Provision of a new six form entry secondary school with new sports facilities which will be available for community use outside of school hours;
 - ii New community space including a new boat house;

¹ Note that the Applicant only agrees that the offer is 17.5% if one assumes that the up to 150 flexible assisted living / residential units come forward as residential (Class C3). If the units were to be delivered as Assisted Living, it is the Applicant's view that the use class is C2 and these units should not be subject to affordable housing requirements. Notwithstanding this position, this Addendum Statement sets out the 17.5% on the basis that this is the quantum which the GLA have considered. It should also be noted that this % assumed that the Site could benefit from demolition credit in respect of CIL – as presented to the LBRuT Planning Committee on 29 January 2020, if the Site could not benefit from this credit (and therefore a higher CIL payment would be required), this would reduce the amount of affordable housing that the Original Scheme could deliver.

- iii New office and flexible use commercial space including retail and restaurants;
 - iv Provision of significant areas of new public open space, including green space;
 - v Creation of new cycle and pedestrian routes through the Site, including provision of a large public 'Green Link' from Mortlake Green to the river;
 - vi High quality, well designed new architecture;
 - vii Incorporation of sustainable and low-carbon technologies and biodiversity measures; and
 - viii Improvements to the local highway network and provision of cycle parking facilities.
- 1.9 The original vision for the Applications was that the scheme should deliver a 'new heart for Mortlake', in line with the aspirations set out in the LBRuT Stag Brewery Planning Brief (2011). The amendments to the scheme continue to achieve this Vision, through the opening up of the Site, the creation of a new High Street, the provision of a new range of homes and the provision of community uses and a new school.
- 1.10 This Addendum Statement summarises the proposed amendments to the scheme, and assesses these against relevant planning policy. Consideration has been given to the draft policies of the emerging London Plan. The Town Planning Statement submitted with the Applications in February 2018, and the Addendum Town Planning Statement submitted in May 2019, concluded 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. This Addendum Statement considers the amendments now proposed and concludes that these changes do not alter this conclusion – the scheme is still considered to be in accordance with the development plan as a whole and where that is not the case in relation to individual policies that is outweighed by other material considerations.
- 1.11 A package of documents has been prepared by the Applicant's project team for formal submission to the Mayor. These documents include the proposed amendments to the scheme and, where relevant, updated documents following the consultation process. This document should be read alongside the submitted substitution and revised

documents as well as the February 2018 Town Planning Statement and May 2019 Addendum Town Planning Statement.

2 Introduction

- 2.1 This Further Addendum Town Planning Statement (“the Addendum Statement”) has been prepared by Gerald Eve LLP as an addendum to the Town Planning Statement (February 2018) and Addendum Town Planning Statement (May 2019) submitted under Applications A, B and C (refs. 18/0547/FUL, 18/0548/FUL and 18/0549/FUL) (the Applications’), in respect of the former Stag Brewery Site in Mortlake (“the Site”) within the London Borough of Richmond Upon Thames (“LBRuT”). The Applications are for the comprehensive redevelopment of the Site. This document has been prepared on behalf of Reselton Properties Limited (“the Applicant”). A summary of the Applications is set out below:
- a) Application A – hybrid planning application for comprehensive mixed use redevelopment of the former Stag Brewery site consisting of:
 - i. Land to the east of Ship Lane applied for in detail (referred to as ‘Development Area 1’ throughout); and
 - ii. Land to the west of Ship Lane (excluding the school) applied for in outline (referred to as ‘Development Area 2’ throughout).
 - b) Application B – detailed planning application for the school (on land to the west of Ship Lane).
 - c) Application C – detailed planning application for highways and landscape works at Chalkers Corner.
- 2.2 This document should be read alongside the information and assessment contained within the Town Planning Statement (February 2018) and Town Planning Statement Addendum (May 2019).
- 2.3 The Applications were submitted in February 2018 to LBRuT. In May 2019, a package of substitutions was submitted to LBRuT for consideration, which sought to address comments raised by consultees during determination. On 29 January 2020, the Applications were taken to LBRuT’s Planning Committee with a recommendation for approval. This scheme is thereafter referred to as “the Original Scheme”.
- 2.4 The Committee resolved to grant Applications A and B, and refuse Application C. The granting of Applications A and B was subject to the following:

- i Conditions and informatives as set out in the officer's report, published addendum and agreed verbally at the meeting;
- ii Amendments to the Heads of Terms and completion of a Section 106 Legal Agreement which was delegated to the Assistant Director to conclude;
- iii No adverse direction from the GLA; and
- iv No call in by the Secretary of State for Housing, Communities and Local Government.

2.5 The Applications have been referred to the GLA and the Mayor gave a direction on 4 May 2020 that he will take over the determination of the Applications and act as local planning authority.

2.6 The Applicant has engaged with the GLA in respect of amendments to the scheme, referred to throughout this document as the "Revised Scheme". As a result of these discussions, a number of changes have been made to the scheme proposals which are summarised as follows:

- i Increase in residential unit provision from up to 813 units (this includes the up to 150 flexible assisted living and / or residential units) to up to 1,250 units;
- ii Increase in affordable housing provision from up to 17% to up to 30%;
- iii Increase in height for some buildings, of up to three storeys compared to the Original Scheme;
- iv Change to the layout of Blocks 18 and 19, conversion of Block 20 from a terrace row of housing to two four storey buildings;
- v Reduction in the size of the western basement, resulting in an overall reduction in car parking spaces of 186 spaces, and introduction of an additional basement storey beneath Block 1 (the cinema);
- vi Other amendments to the masterplan including amendments to internal layouts, re-location and change to the quantum and mix of uses across the Site, including the removal of the nursing home and assisted living in Development Area 2;
- vii Landscaping amendments, including canopy removal of four trees on the north west corner of the Site; and

- viii Alternative options being explored to Chalkers Corner highways works in order to mitigate highways impacts.
- 2.7 The submission documents have tested an affordable housing provision of 30%. However, it should be noted that the final affordable housing level is subject to further viability testing and discussions with the GLA.
- 2.8 Minor amendments have also been made to the road and pedestrian layouts for the school (Application B). No other amendments are proposed to Application B. No amendments are proposed to the physical works proposed under Application C, although alternative options within the highway boundaries for mitigating the highway impact of the amended proposals have been assessed within the relevant substitution documents for Applications A and B and are the subject of ongoing discussions with the GLA and TfL.
- 2.9 A more detailed summary is included within section 4 and Appendix A of this Addendum Statement and the Design and Access Statement Addendum submitted with the Revised Scheme documents. Revised descriptions of development for Applications A and C are attached at Appendix B.
- 2.10 These changes are being brought forward as substitutions to Applications A, B and C (refs. 18/0547/FUL, 18/0548/FUL and 18/0549/FUL), which are related applications (to be linked via a Section 106 Agreement).
- 2.11 It is important to note that no changes are proposed to the physical works proposed under Application C – the only change to this application is that the supporting documents (which include all documents submitted under Applications A and B) have been updated in the context of the proposed changes to the scheme as sought under Applications A and B. Application C was resolved to be refused by LBRuT at Committee on 29 January 2020. As a result, whilst the works proposed in Application C are still an available option, the Applicant has progressed alternative approaches for addressing and mitigating the impacts on surrounding highways, and these have been tested within the relevant substitution documents for Applications A and B. All of these options are subject to ongoing discussions and testing with the GLA and TfL. They are all within the existing highway boundaries and if agreed would not, in themselves, require planning consent.
- 2.12 Accordingly, Application C remains ‘live’ within this substitution package.

3 Background to Scheme Amendments

Background to Mayoral Call In

- 3.1 The Applications were submitted on 19 February 2018 (refs. 18/0547/FUL (“Application A”), 18/0548/FUL (“Application B”) and 18/0549/FUL (“Application C”). This followed extensive consultation with LBRuT and the general public since early 2016.
- 3.2 On 9 April 2018, the February 2018 submission of the Applications was referred to the Mayor under Categories 1A, 1B, 1C, 3C and paragraph 2 of the Schedule of the Town and Country Planning (Mayor of London) Order 2008. On 30 July 2018, the Mayor issued his ‘Stage 1’ Report. The Stage 1 Report confirmed the Mayor’s support for the February 2018 Submission in principle, noting that: **“The redevelopment of this brownfield site for mixed use development is supported”**. The Report advised that the February 2018 submission did not yet fully comply with the London Plan and the draft New London Plan, and requested further clarification and details in relation to community use of the sports facilities, affordable housing, residential design, climate change and transport.
- 3.3 In response to post-submission consultation with statutory consultees, LBRuT and the GLA, a series of amendments to the scheme were made and a package of substituted documents was submitted to LBRuT on 3 May 2019. The amendments submitted broadly comprised:
- i Reduction in residential units by 4, increase in habitable rooms and minor reduction in residential floor area, and amendments to residential unit sizes and mix on east side of Ship Lane (Development Area 1);
 - ii Changes to residential amenity space provision;
 - iii Changes to building design including amendments to turret design, proposed elevations, façades and internal elements of buildings;
 - iv Amendments to the design of the proposed water sports centre (Block 9);
 - v Landscaping and signage amendments;
 - vi Increased cycle parking provision;
 - vii Changes to the flexible floorspace limits for office (Class B1) and retail (Class A1), as well as minor amendments to floorspace areas; and

viii Introduction of replacement climber planting on the street frontage at Chalkers Corner.

- 3.4 These amendments were formally re-consulted upon by LBRuT.
- 3.5 Following further minor scheme amendments, the Applications were considered at LBRuT's Planning Committee on 29 January 2020 and were recommended for approval by LBRuT officers.
- 3.6 The Committee resolved to grant Applications A and B, and refuse Application C. The granting of Applications A and B was subject to the following:
- i Conditions and informatives as set out in the officer's report, published addendum and agreed verbally at the meeting;
 - ii Amendments to the Heads of Terms and completion of a Section 106 Legal Agreement which was delegated to the Assistant Director to conclude – this was to be based on the Heads of Terms set out in the Committee Report and as amended due to the refusal of Application C;
 - iii No adverse direction from the GLA (direct a refusal or issue a direction to act as the local planning authority for the purpose of determining the Applications); and
 - iv No call in by the Secretary of State for Housing, Communities and Local Government (this referred to Application A only which is subject to referral to the National Planning Casework Unit for the reason that the proposal incorporates a quantum of retail space outside a town centre).
- 3.7 The Committee minutes state that the Committee resolved to refuse Application C as the mitigation measures secured under Applications A and B deemed that the adverse highway impacts could be **“adequately mitigated”** without the need for the Chalkers Corner works (Application C). Application C was therefore considered an **“inappropriate and unnecessary form of development where any benefits that the scheme may deliver is outweighed by harm.”**
- 3.8 Specifically on the reasons for refusal, the Committee minutes set out the following reasons for refusal for Application C:
- a) **“Trees: The development, by reason of the proposed siting of the highway works; the subsequently loss of highly prominent trees of townscape and amenity value, and the inadequacy of the proposed planting and CAVAT**

contribution that are not deemed to sufficiently mitigate the harm caused by the loss of the existing trees, would represent an unacceptable form of development, that would harm the visual amenities of the streetscene, surrounding residential properties and area in general, contrary to policy, in particular policies LP 1, LP 8 and LP 16 of the Local Plan; policy 7.21 of the London Plan and the National Planning Policy Framework.

- b) **Other Open Land of Townscape Importance and Unneighbourly:** The development, by reason of the encroachment of the public highway and footway towards and within Chertsey Court and the consequential loss of Other Open Land of Townscape Importance, which is of value by reason of its presence, green nature and openness, would represent an unacceptable and unneighbourly form of development that would harm the green openness and character of both the grounds within Chertsey Court and the kerb side adjacent, to the detriment of the visual amenities of surrounding residents, streetscene and area in general. The development would thereby be contrary to policies, in particular LP 1, LP 8 and LP 14 of the Local Plan and the National Planning Policy Framework.
- c) **Air Quality:** The development, by reason of, its location within an Air Quality Management Area and Air Quality Focus Area; the proposed alterations and increase to the size of the road network; the subsequent reduction in width of the public realm; and the absence of acceptable mitigation to protect the users of the pedestrian network; would result in a poor walking environment and increase the risk of exposure to poor air quality in an area that already suffers from high levels of pollution. The development is thereby contrary to policies, in particular policies LP 10, LP 30 and LP 44 of the Local Plan, policy 7.14 of the London Plan and the National Planning Policy Framework, all of which aim to improve local environmental conditions such as air quality, minimise increased exposure to existing poor air quality, and enhance existing walking networks and people’s health and wellbeing.”

3.9 The minutes go on to state that: **“The Committee did not agree that application C was required to mitigate applications A and B in transport terms (LP14, 15,16, 10, 9 and 8 all mentioned)”**.

3.10 The resolution to refuse Application C was subject to referral to the GLA for the Mayor to:

- i Allow the recommendation to proceed unchanged / Direct the Council under Article 6² to refuse the application; or
- ii Issue a direction under Article 7³ that he is to act as the local planning authority for the purpose of determining the application.

3.11 The Applications were subsequently referred to the Mayor on 22 April 2020 for his Stage 2 review. Following a review of the Applications and LBRuT's intended decision, the Mayor set out in his Stage 2 Report that the Applications were of a nature and scale that would have a **“significant impact on the implementation of the London Plan policies on housing and affordable housing supply, and education”** and therefore it was considered that there were sound reasons for the Mayor to issue a Direction under Article 7⁴, as the Applications were of strategic importance and had the potential to make an important contribution to housing and affordable housing supply. On 4 May 2020 the Mayor directed that he would act as the local planning authority for the purposes of determining Applications A, B and C.

Context of Scheme Amendments

- 3.12 The Applicant has been in discussions with the GLA and TfL in respect of amendments to the Original Scheme. As set out in the Mayor's Stage 2 Report, GLA officers considered that the Original Scheme should be called in because:
- i The redevelopment proposed has the potential to make a significant contribution to strategic housing and affordable housing targets. However, the affordable housing contribution falls short of Borough and London Plan targets, and would exacerbate LBRuT's recent underperformance, particularly with respect to affordable housing.
 - ii Without the Application C works or alternative highways mitigation measures being secured, there is a risk that the impact of the increased traffic associated with the proposed development may not be adequately mitigated.

² Of The Town and Country Planning (Mayor of London) Order 2008

³ As above

⁴ As above

iii Given that Application B (the school) comprises part of the wider scheme, the Mayor must also give further consideration to this application in conjunction with Applications A and C.

- 3.13 The Applicant has therefore been working with GLA officers to see how the scheme can deliver more housing and affordable housing on Site, whilst giving due regard to the surrounding physical context and highway network. These discussions have resulted in changes to the scheme which are set out in Section 4 and Appendix A of this Addendum Statement but broadly comprise an increase in the level of housing and affordable housing on Site, increase in height and layout of some of the buildings, reduction in car parking provision, and changes to the proposals at Chalkers Corner.
- 3.14 In respect of affordable housing, the GLA Stage 2 report acknowledged that **“it has not been possible to demonstrate that the current scheme can viably deliver more than 17% affordable housing”**. Notwithstanding this, and the suggested inclusion of viability review provisions in the planning agreement, GLA officers conclude that a **“sub-optimal scheme is currently proposed”**. Physical amendments to the scheme have been made to optimise the amount of affordable housing delivery – these changes include increasing building heights, re-configuration of some of the blocks, amendments to the layout of some buildings, changing the use of non-residential spaces to residential and amending the tenure split.
- 3.15 In respect of highways works, following LBRuT Planning Committee’s resolution to refuse Application C, the Applicant has reviewed the highways mitigation measures in the context of the revised proposals, which include a significant reduction in the size of the western basement. The Applicant has also reviewed the vehicle trip generation figures arising from the proposed school, which were questioned by Committee Members as being too high for a new school in this location.
- 3.16 As a result, whilst the works proposed in Application C are still an available option, the Applicant has progressed alternative approaches for addressing and mitigating the impacts on surrounding highways, and these have been tested within the relevant substitution documents for Applications A and B. All of these options are subject to ongoing discussions and testing with the GLA and TfL. They are all within the existing highway boundaries and if agreed would not, in themselves, require planning consent.

- 3.17 The four alternative highway works ‘options’ which have been discussed with and presented to TfL, are described in the submitted Transport Assessment and summarised in Chapter 4 of this document. The Applicant team have considered each option and the relevant submission documents include an assessment of each option to assess the impact. On the assumption that they fall within the highway, the alternative option works shown in the submission documents are illustrative, with final details to be secured with LBRuT and TfL via Section 278 discussions post-permission.
- 3.18 It is important to note that this substitution package proposes no changes to the physical works proposed under Application C – the only change to this application is that the supporting documents (which include all documents submitted under Applications A and B) have been updated in the context of the proposed changes to the scheme as sought under Applications A and B.

Revised Scheme Substitution Documents

- 3.19 Given the nature of the scheme amendments in the context of the Original Scheme, these changes have been submitted to the GLA for consideration as substitutions to the Original Scheme.
- 3.20 Documents have been prepared by the Applicant’s project team which consider the proposed amendments on the assessments and conclusions set out within the Original Submission documents. Where more appropriate, revised documents have been prepared as opposed to addendum documents.
- 3.21 A full list of the submitted documents forming part of this substitution package can be found in the submitted covering letter, prepared by Gerald Eve LLP.

4 Post-Call In Amendments

- 4.1 As set out above, the Revised Scheme proposes changes to the proposed development which broadly seek to optimise the number of residential units (and affordable housing) on the Site and reduce car traffic flows. These amendments result in a series of amendments to Application A. Minor changes are proposed to Application B (just in terms of external access arrangements). No changes are proposed to the physical works proposed under Application C, although alternative options within the highway boundaries for mitigating the highway impact of the amended proposals have been assessed within the relevant substitution documents for Applications A and B and are the subject of ongoing discussions with the GLA and TfL.
- 4.2 The scheme changes are summarised in Appendix A and described in greater detail in this section.

Land Uses

Housing

- 4.3 The Revised Scheme will deliver up to 1,250 residential units. 576 of these would come forward on the eastern portion of the Site and in detail, with up to 674 being delivered on the western portion of the Site (submitted in outline). The unit numbers compared to the Original Scheme are shown in Table 1 below. For the purpose of assessing the Revised Scheme in Environmental Impact terms, the scheme parameters propose a maximum level of 30% affordable housing based on an identified tenure split. However, the final level of affordable housing is the subject of ongoing viability discussions with the GLA.

Table 1: Proposed Housing Split

Housing Type	Original Scheme ⁵	Revised Scheme ⁶	Net Change (+/-)
Housing (Private)	525	894	+369
Housing (Affordable)	Up to 138	Up to 356	Up to +218
Flexible residential or assisted living (C2/C3)	150	0	-150
Total	813	1,250	+437

Note: All figures shown are 'up to' given part of the Site is applied for in outline

4.4 The increase in housing is driven largely as a result of the following scheme amendments:

- i Increase of building heights at appropriate locations across the Site;
- ii Re-configuration of the layout of the buildings on the north west corner of the Site;
- iii Conversion of the flexible residential / assisted living units (which were originally intended to provide larger units for an older accommodation) to provide smaller residential units;
- iv Amendments to unit mix; and
- v Conversion of some non-residential uses to deliver additional residential housing.

4.5 The tenure split for the Original Scheme and the Revised Scheme is set out in the Tables 2 and 3 below. It should be noted that the unit numbers presented are all 'up to' as part of the Site is submitted for in outline. The Revised Scheme tenure mix is indicative at this stage representing the maximum quantum of affordable housing. However, the final level of affordable housing is the subject of ongoing viability discussions with the GLA.

4.6 Whether or not the existing buildings on Site are classed as being "in use" for the purposes of the Community Infrastructure Levy ("CIL") payment will affect the amount of affordable housing that can be delivered on Site. For the Original Scheme, two figures were presented to the LBRuT Committee in the Officer's Report – one which assumed the higher CIL payment and one which assumed the lower CIL payment. This is reflected in Table 2.

4.7 It should be noted that the financial viability for the Revised Scheme assumes that the lower CIL payment can be achieved – i.e. this cost saving has been incorporated into the viability considerations. A change to this assumption may affect the conclusions reached.

Table 2: Original Scheme Tenure Mix (total residential number includes the 150 flexible assisted living / residential (Class C2 and/or Class C3) units)

	Private	Affordable⁷	Social Rent <i>(% of total affordable)</i>	Intermediate <i>(% of total affordable)</i>	Total
Lower CIL Payment⁸					
Units	675	138	110	28	813
%	83%	17%	80%	20%	100%
Higher CIL Payment⁹					
Units	718	95	76	19	813
%	88%	12%	80%	20%	100%

⁵ Note that the number of affordable units presented here is indicative – the Applicant agreed to a review of the number of affordable units (not floorspace) post the grant of planning permission (to be secured by S106 agreement). Also note that the affordable figure presented here assumes the lower CIL payment, as presented in the LBRuT Planning Committee report for the meeting on 29 January 2020 – the higher CIL figure would have an effect on the level of affordable housing able to be delivered in the Original Scheme

⁶ Note that the affordable figure shown here is an 'up to' number – the final quantum will be agreed in due course as a result of viability discussions

⁷ Note that the number of affordable units presented here is indicative – the Applicant agreed to a review of the number of affordable units (not floorspace) post the grant of planning permission (to be secured by S106 agreement)

⁸ £25,383,731 as reported in the LBRuT Planning Committee report for the meeting on 29 January 2020

⁹ £43,996,571 as reported in the LBRuT Planning Committee report for the meeting on 29 January 2020

Table 3: Revised Scheme Tenure Mix

	Private	Affordable	Social Rent (% of total affordable)	Intermediate (% of total affordable)	Total
Lower CIL Payment					
Units	894	356	127	229	1,250
%	72%	28% (30% by habitable room)	36%	64%	100%

4.8 Table 4 below provides an overall comparison of the indicative unit mix between the Original Scheme and the Revised Scheme in percentage terms. It should be noted that the mixes presented are indicative and dependent on the outcome of viability discussions with the GLA.

Table 4: Summary Indicative Unit Size / Tenure Comparison¹⁰

Tenure	Social Rent		Intermediate		Private	
	Original	Revised	Original	Revised	Original	Revised
1B2P ¹¹	6 (5%)	8 (6%)	17 (60%)	67 (29%)	62 (12%)	309 (35%)
2B3P	6 (5%)	5 (4%)	1 (5%)	14 (6%)	28 (5%)	112 (13%)

¹⁰ The up to 150 flexible assisted living / residential (Class C3 and / or Class C2) units are excluded from the total %s set out in Table 2

¹¹ The 1Bed classification here includes studios as set out in Table 3 for the private elements

2B4P	39 (35%)	44 (35%)	10 (35%)	134 (59%)	245 (47%)	285 (32%)
3B	55 (50%)	64 (50%)	0 (0%)	14 (6%)	163 (31%)	173 (19%)
4B	6 (5%)	6 (5%)	0 (0%)	0 (0%)	27 (5%)	15 (2%)
Total	110¹² (100%)	127 (100%)	28 (100%)	229 (100%)	525 (100%)	894 (100%)

Town Centre Uses

- 4.9 The Original Scheme proposed a range of town centre uses on the eastern side of the Site. The Revised Scheme continues to propose this range, albeit with some amendments, as set out below in Table 5:

¹² Note that the total social rent units for the Original Scheme add up to 112, not 110. The total should be 110 – the individual unit numbers add up to a different total due to rounding

Table 5: Town Centre Uses (sqm GIA)

Town Centre Use	Original Scheme	Revised Scheme	Area Change	Other Amendments
Flexible Use Floorspace	4,686	5,023	+337	Additional flexible use space, suitable for community use, introduced at the lower levels of the Bottling Building (Block 5).
Office	2,424	5,523	+3,099	Office accommodation still in Block 5, but also introduction of space in Block 1 above the cinema
Gym	740	0	-740	Removal of gym
Cinema	2,120	1,606	-514	Introduction of new basement level (basement -2) with office at upper floors (increase of one storey)
Hotel	1,673	1,765	+92	Minor area increase
Total	11,643	13,917	+2,274	

4.10 The Original Scheme proposed 'caps' for the flexible use areas and these have been amended as follows:

Table 6: Proposed Flexible Use Caps

Use Class	Minimum sqm (GIA)*	Maximum sqm (GIA)
Class A1	-	2,200
Class A2	-	220
Class A3	-	2,400
Class A4	-	1,800
Class B1	2,000	2,200
Class D1	-	1,300
Sui Generis (boathouse)	-	380

* 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. 5,023 sqm (GIA)

- 4.11 The location of the flexible uses are shown on the submitted masterplans, prepared by Squire & Partners (refs: C645_MP_P_00_001 Rev C and C645_B04_P_01_001 Rev C).
- 4.12 In the Original Scheme, a 'High Street Zone' within Development Area 1 was identified, comprising some of the overall flexible use space. 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. The plan has been updated for the Revised Scheme and has been included at Appendix C.

Design and Landscaping

- 4.13 The Revised Scheme includes an increase in building heights of up to 3 storeys. The heights as previously proposed under the Original Scheme and now proposed under the Revised Scheme are set out in Appendix A.

4.14 Minor changes have also been made to the configuration of the building layouts. Principally, changes have been made to the layout of the blocks in the north west corner of the Site, with changes to the layout of Blocks 18 and 19, and changes to Blocks 20 and 21, including conversion of Block 20 into residential apartments with the block being split in to two. Minor changes have been made in Development Area 1, including the introduction of a second level of basement beneath Block 1 (the cinema). Other minor design changes include changes to internal layouts and minor changes to façade and elevational treatments.

4.15 Landscaping amendments at the Stag Brewery Site focus primarily around the re-configuration of some blocks, and the increase in cycle parking and playspace provided as a result of the increased quantum of uses. No additional trees on the Stag Brewery Site are proposed to be removed, albeit 4 in the north west corner of the Site will require pruning.

Transport, including Chalkers Corner

4.16 In respect of Application C, as previously set out, Application C is still ‘live’ and no changes are proposed to the physical works. Whilst this is still an available option, the Applicant has progressed alternative approaches for addressing and mitigating the impacts on surrounding highways, and these have been tested within the relevant substitution documents for Applications A and B. All of these options are subject to ongoing discussions and testing with TfL. They are all within the existing highway boundaries and if agreed would not, in themselves, require planning permission. All of these alternative options are shown in the submission documents as illustrative, with further details to be agreed with the relevant statutory authorities after the receipt of planning permission.

4.17 Four alternative highways ‘options’ have been discussed with, and presented to TfL, which broadly comprise:

- i Option 1 – ‘Do nothing’ and provide LBRuT with a financial contribution for highways works (this is as per the LBRuT Committee resolution);
- ii Option 2 – Chalkers Corner ‘Light’ – these works look to add a new left-hand turn lane at the junction of Lower Richmond Road and Clifford Avenue by removing part of the informal parking area at Chalkers Corner, on the southern side of

Lower Richmond Road. The works would also include introduction of a landscaping corridor.

- iii Option 3 – Lower Richmond Road Bus Lane – this option would introduce a bus lane along Lower Richmond Road and replace the existing on street car parking;
- iv Option 4 – Chalkers Corner ‘light’ plus Bus Lane – this option would be a combination of Options 2 and 3 set out above.

4.18 The Revised Scheme does not prejudice any of the above highways options coming forward. The relevant submission documents have considered each option and the associated technical and landscaping implications.

4.19 The Further Transport Assessment Addendum and the Environmental Statement Addendum also consider Application C (‘referred to as ‘Option 5’) in the context of the other scheme changes proposed under Applications A and B. Landscaping implications for Application C are included within the previously submitted Landscape Design and Access Statement.

4.20 The Revised Scheme also includes a significant reduction in on site car parking spaces due to the decrease in the size of the western basement.

4.21 The Revised Scheme also proposes an increase in the amount of cycle parking provided on Site, other minor amendments to highways works and minor amendments to the pedestrian and access routes to the school.

5 Planning Policy Framework

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.
- 5.2 The Applications were originally submitted on 19 February 2018. The adopted development plan for the Site at that time comprised:
- i National Planning Policy Framework (2012);
 - ii London Plan (2016) (consolidated with alterations since 2011);
 - iii LBRuT Core Strategy (2009);
 - iv LBRuT Development Management Plan (2011); and
 - v Stag Brewery Planning Brief (2011) (Planning Guidance Document only).
- 5.3 The Original Scheme was thoroughly assessed against the NPPF, the adopted London Plan and the then adopted LBRuT Development Plan documents. The scheme was also assessed against the now adopted LBRuT Local Plan given that it was at Examination in Public stage at the time of the Applications' submission.
- 5.4 The policy designations for the Site set out in the now adopted Policies Map remain the same as at the time the original planning applications were submitted.
- 5.5 The NPPF, originally published in 2012, has been revised and a new NPPF published in July 2018 and further minor revisions were published in February 2019. The revised NPPF continues to apply a presumption in favour of sustainable development (paragraph 11) which means approving development proposals that accord with an up-to-date development plan without delay.
- 5.6 The scheme revisions included within this substitution pack have been reassessed against the relevant and in the case of the LBRuT Local Plan (2018), now adopted, planning policy at all levels. Where a change in the conclusions from the Original Scheme assessment has been found, this has been highlighted.

- 5.7 The revisions have also been assessed against relevant emerging draft London Plan policies (Intend to Publish Version, December 2019) (“ITP London Plan”) for completeness.
- 5.8 The substitution documents seek to address any relevant updates in respect of planning policy, alongside an update to the assessment as a result of any relevant scheme amendments.

6 Principle of Redevelopment

- 6.1 There continues to be policy support at all levels for the redevelopment of the Stag Brewery Site.
- 6.2 Paragraph 118 of the revised NPPF states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes, as well as promoting and supporting the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained.
- 6.3 Section 7 of the submitted Town Planning Statement (February 2018) provides a full assessment. Since the preparation of this Statement, the only planning policy changes are the formal adoption of the LBRuT Local Plan, revised NPPF and publication of the ITP London Plan.
- 6.4 The Site is now subject to a formally adopted Site Allocation (LBRuT Local Plan SA 24) and the principle of the Site's sustainable mixed-use redevelopment continues to be supported both by policy at a strategic London-wide level and the policies and objectives of the now adopted LBRuT Local Plan.
- 6.5 LBRuT supported the principle of the redevelopment of the Site as demonstrated by the LBRuT Planning Committee's resolution to approve Applications A and B. The GLA's Stage 1 response (paragraph 99) highlights officer support for the Site's redevelopment: **“the redevelopment of this brownfield site for mixed use development is supported in line with London Plan and draft London Plan policies.”** The response goes on to state that 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.”**
- 6.6 There is a clear need and priority to increase the provision of homes in LBRuT. The ITP London Plan has revised the ten-year housing target for the London Borough of Richmond to 4,110 (up from 3,150 in the current London Plan). The revisions proposed to the scheme in this substitution would make a meaningful contribution (30%) to the borough's ten-year housing target, in an established sustainable and

location which has been actively promoted for residential-led mixed-use redevelopment and as such should be supported and approved.

- 6.7 In addition, the Revised Scheme continues to propose the erection of a new secondary school with a sixth form, which the GLA acknowledge in the Stage 2 report would meet an identified need.
- 6.8 There is no doubt that the principle of redeveloping the Site for the broad mix of uses proposed continues to be supported by planning policy. There continue to be no physical or environmental reasons that would prevent the Site being redeveloped (as demonstrated within this substitution package). The proposals would deliver the vision for the Site (as identified in the adopted Stag Brewery Planning Brief) 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. 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.

7 Proposed Land Uses

- 7.1 This section considers whether the changes proposed in the Revised Scheme, or planning policy changes, affect the land use assessment set out within the submitted Town Planning Statement (February 2018) and Addendum Town Planning Statement (May 2019).
- 7.2 This section considers the following land uses:
- a) Housing (including affordable housing)
 - b) Town centre uses
 - i. Retail and Leisure
 - ii. Offices
 - iii. Hotel/pub with accommodation
 - c) Social and community uses
- 7.3 The principle of the school use is not considered within this section as the Revised Scheme proposes no changes to the school (aside from minor access amendments).

Housing

Planning Policy

- 7.4 Planning policy at all levels continues to support the delivery of housing at the Site. The NPPF states at paragraph 118 (part c) that planning policies and decisions should “**give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs**”.
- 7.5 At London Plan level, the principle of utilising brownfield sites for the delivery of housing is set out in the London Plan (Policy 3.3). This is echoed in draft Policy H1 of the ITP London Plan. Specifically in relation to the Stag Brewery, the Site is the subject of a now adopted Local Plan Site Allocation (Policy SA 24) which requires residential (including affordable housing) to be provided.

Assessment

- 7.6 As set out within Table 3, the Revised Scheme would deliver up to 1,250 residential units, which represents an increase of up to 433 compared to the Original Scheme. The

residential provision would represent a significant provision of housing in the plan period (2015-2025) (1,250 out of a target of 3,150). Even when taking into account the ITP London Plan target of 4,110 homes (Table 4.1) for LBRuT in the next ten-year period, the proposed increase of homes on the site to 1,250 represents a substantial contribution to the borough's target (30%).

- 7.7 The Site is a brownfield site, and in line with national, London Plan and local policy aspirations, the Revised Scheme would be delivering homes for which there is an identified need. It is therefore considered that the principle of the development of housing on the Site is fully supported by planning policy at all levels.

Affordable Housing

Planning Policy

- 7.8 The NPPF sets out that homes should be delivered where they are needed, meet the needs of groups with specific housing requirements, and that permission for development should be granted without unnecessary delay (paragraph 59). Where a need for affordable housing is identified, this should be expected to be met on-site unless off site provision or an appropriate financial contribution in lieu can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities (paragraph 62). The NPPF goes on to state that **“to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount”** (paragraph 63).
- 7.9 The London Plan (Policy 3.11) seeks to maximise affordable housing provision and sets out that Boroughs should set an overall target for affordable housing needed over the plan period.
- 7.10 The ITP London Plan continues to seek to maximise affordable housing provision, but rather than boroughs setting their targets, draft Policy H4 sets a strategic target of 50% of all new homes to be delivered as genuinely affordable. Draft Policy H5 sets the threshold approach to major development proposals which trigger affordable housing requirements. The threshold level of affordable housing on gross residential development is initially set at:

- i A minimum of 35%; or
- ii 50% for public sector land where there is no portfolio agreement with the Mayor; or
- iii 50% for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7.

7.11 Draft Policy H5 (part C) goes on to state that applications which meet or exceed the above thresholds without public subsidy, are consistent with relevant tenure split, meet other relevant policy requirements and obligations to the satisfaction of the Borough and the Mayor where relevant and demonstrate that they have taken account of the strategic 50% affordable housing target and have sought grants to increase provision can follow the Fast Track Route. Fast tracked applications are not required to provide a viability assessment at application stage and subject to Early Stage Viability Reviews. Applications not following the Viability Tested Route will normally also be subject to late stage, and one or more additional reviews. The supporting text to draft Policy H5 (para 4.5.15) sets out that schemes claiming the vacant building credit are not suitable to follow the Fast Track Route.

7.12 At a local level, the now adopted LBRuT Local Plan (Policy LP 36) targets at least 50% provision affordable housing on site. Part C of the Policy notes that the Council will seek the maximum reasonable amount of affordable housing having regard to economic viability, individual site costs, the availability of public subsidy and the overall mix of uses and other planning benefits. Supporting para 9.3.2 sets out that the Vacant Building Credit will not apply.

Assessment

7.13 The final level of affordable housing for the Revised Scheme is the subject of ongoing viability discussions with the GLA. However, for the purpose of assessing the scheme in terms of Environmental Impact, the scheme parameters propose a maximum level of 30% affordable housing (by habitable room) based on an identified tenure split. This equates to up to 356 affordable units. In terms of tenure split, in order to increase the level of affordable housing that the Site may be able to provide, the tenure split has changed as shown in Table 3 of this Addendum Statement. 36% of units could be

provided as social rent and 64% as intermediate (as opposed to 80% social rent and 20% intermediate on the Original Scheme).

- 7.14 In line with policy requirements, a Financial Viability Assessment has been prepared by BNP Paribas and submitted with the Revised Scheme. The maximum reasonable affordable housing will be provided on Site, which is in line with national, London Plan and local policy requirements which all acknowledge the need to take into account financial viability in delivering affordable housing against policy targets.
- 7.15 In respect of Vacant Building Credit, it should be noted that the Applicant's arguments presented on this point in the Town Planning Statement (February 2018) remain relevant and valid.

Town Centre Uses

- 7.16 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).
- 7.17 As set out in Table 5 in this Addendum Statement, the Revised Scheme proposes some amendments to the quantum and mix of town centre uses. In summary, the 'flexible use' floorspace would be slightly increased, the amount of office space would be increased, the gym would be removed and minor amendments would be made to the cinema and hotel.
- 7.18 The acceptability of these Town Centre uses in land use terms is assessed within this section. The planning policy position remains as per the February 2018 Planning Statement in that both the London Plan and the LBRuT Local Plan seek to promote and enhance the vitality and viability of town centres. This is echoed by the ITP London Plan draft Policies SD 6, SD 7 and SD 8.

Retail and Leisure

Planning Policy

- 7.19 In respect of retail and leisure, the position in respect of key policy tests has not changed since submission of the Original Scheme. The NPPF continues to require the sequential

approach to site selection and impact. The ITP London Plan draft retail and leisure policies are not subject to any Direction and have not materially changed from the current London Plan. The now adopted LBRuT Local Plan allocates the Site within a designated Area of Mixed Use (Policy LP 25) and the site allocation (Policy SA 24), which both secure the principle of retail and other town centre uses in this location.

Assessment

- 7.20 Compared to the Original Scheme, the Revised Scheme proposes a relatively minor increase in flexible use floorspace, a reduction in cinema floorspace and the removal of the gym. Overall, the Revised Scheme represents a decrease in retail and leisure floorspace of 917 sqm. This decrease is stemmed principally from the removal of the gym (which could be delivered through the flexible use increase) and the decrease in floor area of the cinema. The LBRuT Local Plan nor the Stag Brewery Planning Brief set out the quantum of retail and leisure uses that would be required or supported.
- 7.21 The Revised Scheme continues to provide a range of town centre uses. This mix will continue to contribute to delivering a new ‘heart’ for Mortlake, in line with the aspirations of the Site Allocation (LBRuT Policy SA 24) and the Stag Brewery Planning Brief. It is therefore considered that despite the area reduction, the Revised Scheme would be compliant with these policy ambitions.
- 7.22 In line with national (NPPF para 85), London Plan (Policy 2.15 and draft Policies SD6, SD7) and local (Policy LP 25) planning policy, RPS CgMs have considered the impact of the retail and leisure changes on the vitality and viability of local town centres. The Retail and Leisure Statement Addendum sets out that there are no sequentially preferable sites upon which to accommodate the application proposals in or to the edge of relevant town centres. It is therefore considered that the policy objectives to ensure the vitality and viability of town centres is satisfied.
- 7.23 It is therefore considered that the changes to the retail and leisure provision within the Revised Scheme are acceptable in planning policy terms.

Offices

Planning Policy

- 7.24 Both the Stag Brewery Planning Brief and the LBRuT Local Plan Site Allocation (Policy SA 24) acknowledge support for provision of employment uses on the Site, with Policy SA 24 noting that the Site should provide a **“substantial mix of employment uses (B uses), including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported.”**
- 7.25 The London Plan (Policies 4.1, 4.2, 4.3) and the ITP London Plan (draft Policies E1 and E2) also support office developments in outer London. The NPPF continues to set out the requirement for planning policies to deliver a strong, competitive economy where **“significant weight”** should be placed on the need to support economic growth and productivity (paragraph 80).

Assessment

- 7.26 LBRuT Officers welcomed the provision of employment space proposed under the Original Scheme. The Revised Scheme proposes 5,523 sqm standalone office (Class B1) floorspace, which is an increase of 3,099 sqm compared to the Original Scheme. Coupled with the minimum cap of 2,000 sqm in the flexible use area for offices, this equates to a minimum of 7,523 sqm office floorspace being provided at the Site (compared with a minimum of 4,424 sqm proposed under the Original Scheme).
- 7.27 As per the Original Scheme, the office space provided in the Revised Scheme will be designed to be flexible and adaptable, suitable for a range of uses and provision of co-working. In line with LBRuT Local Plan Policy LP 41 and ITP London Plan Policy E3, 10% of the office space will be provided as affordable workspace.
- 7.28 The increase in office floorspace is considered to be in line with policy aspirations to deliver employment generating uses on the Site and deliver a strong, competitive economy. It is therefore considered that the proposed increased office provision at the Site is acceptable in planning policy terms.

Hotel / Pub with Accommodation

Planning Policy

- 7.29 Aside from the adoption of the LBRuT Local Plan (which was considered in the assessment of the Original Scheme), there have been no policy changes at a national, London Plan or local level which would affect the conclusion that a hotel / pub with accommodation is an acceptable use in this location.

Assessment

- 7.30 As noted in the LBRuT Officer's report for Planning Committee on 29 January 2020, the hotel use is **"in line with the aspirations of the local plan, is not deemed to be of an excessive size for the location and will have minimal impact on hotel supply in local area"**.
- 7.31 Only minor amendments are proposed to the design of the hotel / pub with accommodation, resulting in an increase in floor area of 92 sqm. The Hotel Needs Assessment originally submitted with the Applications (February 2018) remains relevant despite this minor area increase. Given the policy position in terms of principles remains the same, it is considered that the changes proposed to the hotel are consistent with planning policy.
- 7.32 It should be noted that in line with policy requirements, a proportion of bedrooms would be provided as wheelchair accessible. As the layouts which have been submitted are illustrative at this stage (as an operator has not yet been secured), it is envisaged that this requirement would be secured via condition.

Social and Community Uses

Planning Policy

- 7.33 National, London and local planning policy continues to support the principle of social and community uses in this location.

Assessment

- 7.34 The Revised Scheme only proposes minimal changes to the social and community uses. This is by way of increasing the maximum caps for the boathouse and Class D1 uses

as a result of the increase in flexible use area. The caps have been increased from 351 sqm to 380 sqm (boat house) and 1,148 sqm to 1,300 sqm (Class D1 uses). It is also proposed to re-locate the community space from the Maltings Building (Block 4) to Block 5 (to be secured via S106 agreement). There are no changes proposed to the sports provision included within Application B or the community access arrangements.

- 7.35 The minor amendments set out above are not considered to alter the conclusion that the principle of social and community uses in this location is acceptable.

8 Jobs and Employment

Planning Policy

- 8.1 In terms of planning policy, there have been no changes in the direction of policy since the submission of the Original Scheme. The NPPF continues to set out the need to balance economic objectives as part of sustainable development (paragraph 8). The ITP London Plan acknowledges the strategic importance of conserving and enhancing London's global economic competitiveness partly through the diversification of the economy (draft Policy GG5). The now adopted LBRuT Local Plan was considered in the assessment of the Original Scheme. The Site Allocation (Policy SA 24) requires the site to provide employment (B uses), with other employment generating uses to be supported. In terms of Local Employment, LBRuT Local Plan Policy LP 29 requires Local Employment Agreements to be secured through a S106 agreement developments will generate more than 20 FTE jobs.

Assessment

- 8.2 The Revised Scheme would continue to ensure that the scheme delivers significant and widespread job and employment opportunities in a range of sectors and of different types. Currently, the Site provides extremely limited employment opportunity, whereas a masterplan could deliver a significant number of jobs during construction and once the development is occupied.
- 8.3 The Revised Scheme proposes amendments to the type / size of employment generating uses, as set out within sections 4 and 7 of this Addendum Statement. Hatch Regeneris Consulting has considered the impact of these changes on the conclusions of the previously submitted Socio-economic Assessment and Employment Assessment. Addendum and revised documents have been submitted alongside this substitution package which set out that the Revised Scheme will:
- i **“substantially increase the provision of modern, useable employment floorspace in the borough and bring about a wide range of employment related benefits”** (Employment Assessment Addendum, paragraph 6.2);
 - ii Generate around 176 net FTEs as a result of the Class B1 floorspace (compared to 104 net FTEs under the Original Scheme);

- iii Likely generate 172 net FTEs as a result of the other employment generating uses on Site (compared to 257 net FTEs (as a worst case excluding assisted living) under the Original Scheme);
 - iv Taking into account the previous use of the Site as a brewery, the combined employment effect of the proposals would equate to around 195 net additional FTEs (compared to up to 208 net FTEs under the Original Scheme).
- 8.4 The Employment Assessment Addendum also notes the positive employment impacts of the Scheme in terms of construction and increased expenditure to help support local retail and service businesses.
- 8.5 Whilst the Revised Scheme would deliver slightly less employment generating floorspace than the Original Scheme (primarily as a result of the conversion of the assisted living units to residential and removal of the care home), it should be noted that the Revised Scheme is continuing to provide significantly more employment opportunities than the existing Site. Importantly, the conversion of the assisted living units to residential and removal of the care home has facilitated the delivery of additional housing (including affordable housing), which responds to strategic needs.
- 8.6 The Applicant agrees to a Local Employment Agreement to be secured through a Section 106 agreement to support local residents during the construction phase. Reasonable endeavours will be pursued for local employment during the operational phase. At this early stage of development, where the market for the commercial uses and the type/nature of occupiers is unknown, it would be unreasonable to place an onerous restriction on future lettings.
- 8.7 It has been demonstrated that the Revised Scheme will continue to generate a significant level of employment both in terms of number, type and variety of jobs. This continues to be far in excess of the former brewery use and the existing situation. The Revised Scheme therefore fully complies with national, strategic and local policy objectives which seek to ensure that new development provides employment opportunities and economic benefits.

9 Residential Design

- 9.1 Residential design was considered in detail in the assessment of the Original Scheme. Since this time, the only policy updates of note are the amendments to the NPPF, the formal adoption of the LBRuT Local Plan and the publication of the ITP London Plan. The GLA have also updated their population calculator, which affects the child yield calculations generated by residential developments. It should be noted that the original Town Planning Statement (February 2018) considered the draft LBRuT Local Plan and the content of the relevant policy wording did not change in the adopted Local Plan.
- 9.2 The Revised Scheme includes an increase in the number of residential units provided on the Site. Associated amendments have been made to the indicative residential layouts, both in the detailed and outline components of the Site. This section sets out the assessment of the proposed residential units in design terms against relevant planning policy.
- 9.3 This section considers the following:
- i Residential density
 - ii Unit mix
 - iii Unit sizes
 - iv Housing quality
- 9.4 This section does not consider the external building design of the residential spaces – these details are assessed within Chapter 10 of this Addendum Statement.
- 9.5 It should be noted that detailed illustrative residential layouts have been submitted for Development Area 1 (applied for in detail). Those units within Development Area 2 are applied for in outline, and the layout detail will be submitted at Reserved Matters stage. A revised Design Code has been submitted as part of this substitution pack which sets out the rules and guidance that future Reserved Matters submissions should adhere to for these units.

Residential Density

Planning Policy

- 9.6 National planning policy requires developments to “**optimise the potential of sites to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks**”. Development should also be sympathetic to local character and history, while not “**preventing or discouraging appropriate innovation or change (such as increased densities)**” (NPPF, paragraph 127).
- 9.7 In terms of changes to the London Plan, the ITP London Plan removes the density matrix as set out in Table 3.2 of the adopted London Plan (linked to Policy 3.4). Instead ITP London Plan draft Policy D3 states that optimising site capacity must take a design-led approach. The Secretary of State Directions on the draft Plan request that draft Policy D3 is amended to give guidance on the most suitable locations for higher density development. ITP London Plan draft Policy D3 is clear that higher density developments should be promoted in areas that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Gentle densification should be actively encouraged in low and mid-density locations to achieve a change in densities in the most appropriate way.
- 9.8 The policy position in respect of density remains the same as per the Original Scheme for national and local policy. Local planning policy does not dictate required density levels for the Stag Brewery site – instead Local Plan Policy LP 34 states that the Council will encourage higher density development in more sustainable locations. Development should optimise housing delivery taking into account the London Plan density matrix and site-specific context.

Assessment

- 9.9 In terms of relevant scheme changes against this policy background, the Revised Scheme increases the number of residential units on the Site to 1,250. Given this change and the change to the London Plan approach, this section will re-assess the proposed density.

9.10 Tables 7, 8 and 9 below illustrate the density of the Original Scheme compared to the Revised Scheme, using the Mayor's density matrix as set out in Table 3.2 of the London Plan (linked to Policy 3.4).

Table 7: Original Scheme Residential Density Calculations (Blocks 13, 16, 17 (as per Original Scheme) assumed to be brought forward as assisted living units and therefore excluded from density calculations

Original Scheme – Flexible Units (up to 150) excluded from density calculations					
Number of Residential Units	Up to 663				
Average Habitable Rooms per Unit	3.38				
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?
Net Site Area	5.59	119	Yes	402	Yes

Table 8: Original Scheme Residential Density Calculations (Blocks 13, 16, 17 (as per Original Scheme) assumed to be brought forward as residential units and therefore included in density calculations

Original Scheme – Flexible Units (up to 150) included in density calculations	
Number of Residential Units	Up to 813
Average Habitable Rooms per Unit	3.32
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?
Net Site Area	5.88	138	Yes	459	No

Table 9: Revised Scheme Residential Density Calculations

Revised Scheme					
Number of Residential Units	Up to 1,250				
Average Habitable Rooms per Unit	2.90				
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?
Net Site Area	6.07	206	No	598	No

9.11 In the Revised Scheme calculations, the average habitable room count has been reduced as a result of an increase in smaller units within the scheme. The Site area has also increased as Blocks 14 and 15 are now proposed as residential buildings and are therefore no longer excluded from the total site area for the density calculation.

9.12 It can be seen that the Revised Scheme pushes the density beyond that set out within the density matrix. The supporting text to London Plan Policy 3.4 states that it is not appropriate to apply the density matrix mechanistically. In optimising site potential, a range of factors need to be taken into account including local context, design, transport capacity, social infrastructure, open space and play.

9.13 Indeed, ITP London Plan draft Policy D3 adopts a design-led approach, and removes the density matrix assessment. The Revised Scheme has evolved through a design-led approach and the architects have worked closely with GLA officers to develop a scheme which optimises site capacity and is appropriate for the local context. This is considered as follows:

- i **Design** – The Revised Scheme has taken a considered approach to increasing height and re-configuring building layouts in order to deliver additional housing. It is considered that the resulting scheme positively responds to the local context in design terms. Further detail is provided within Chapter 10 of this Addendum Statement and within the Design and Access Statement Addendum.
- ii **Sustainable Travel** – The Revised Scheme encourages and facilitates active travel, with cycle parking being provided in line with ITP London Plan draft standards, and appropriate pedestrian routes provided throughout the Site. The Revised Scheme also reduces the number of car parking spaces on Site compared with the Original Scheme, therefore representing an improvement in terms of facilitating active travel.

As per the Original Scheme, the Revised Scheme will deliver improvements to the level crossing and will contribute towards supporting the bus network capacity in the area.

The Revised Scheme considers servicing and maintenance of buildings and the public realm. In terms of impact on the road network, the vehicular trip generation figures for the Revised Scheme would be lower than the Original Scheme despite the increase in residential units (and number of servicing trips). This is driven in part by the reduction in the size of the western basement.

- iii **Open Space and Playspace** – As set out in the submitted Open Space and Playing Pitches Assessment Addendum (“OSPPA”), the Revised Scheme provides more publicly accessible amenity open space than the Original Scheme (38,943 sqm

compared to 43,687 sqm now proposed). This is compared with 0 sqm of publicly accessible open space on Site as existing. A comprehensive landscape approach has been carefully integrated into the masterplan design, and new and existing residents will be able to enjoy variety of open spaces which will provide access throughout the Site and to the river.

The Revised Scheme also proposes playspace which is in excess of the GLA requirements (using the GLA 2019 Population Yield Calculator).

- iv **Residential Quality** – The Revised Scheme would continue to deliver high quality homes, which would deliver appropriate outlook, privacy and amenity spaces. Safe, secure and inclusive environments would be delivered, and consideration has been given to the impact of noise and air quality on residents.
- v **Sustainability** – The Revised Scheme continues to aim for high sustainability standards.

9.14 Increased density is generally associated with increased heights. It should be noted that whilst the heights in the Revised Scheme have increased from the Original Scheme, this is not the only reason for the increase in residential unit numbers. The ability for the scheme to increase residential unit figures from up to 813 units¹³ to up to 1,250 units (a 54% increase) is set out as follows:

- i **Increased heights** – Heights have been increased across the Site in order to maximise the Site’s full potential. This has only been achieved where it has been considered appropriate in design terms, giving due consideration to local context and the historical context.

It should be noted that whilst the residential unit number has increased by half, the amount of floorspace (i.e. physical development) has only increased by 13% (from 152,024 sqm to 171,768 sqm (GIA)). This demonstrates that the increase in unit numbers (+54%) is not solely driven by an increase in quantum of floorspace delivered.

¹³ Assuming the up to 150 units in the Original Scheme came forward as residential (Class C3) – note these units were applied for as flexible assisted living or residential (Class C2 / Class C3)

- ii **Conversion of assisted living units** – The Original Scheme proposed Blocks 13, 16 and 17 as providing flexible assisted living / or residential units (Class C2 / Class C3). The intention for these blocks was that they would come forward as part of a ‘Care Village’ and be run by an operator alongside the proposed care home (Blocks 14 and 15). Assisted living units are generally 2 / 3 bed larger units, and this was reflected in the fact that these blocks were proposed to deliver up to 150 units.

In the Revised Scheme, these blocks are now proposed solely as residential units only. This has allowed these blocks to be re-considered and to provide smaller units. As a result, these blocks now propose to deliver up to 156 units (this is also delivered through an increase in height of 1 storey for Block 14 and up to 3 storeys for Block 15).

- iii **Revised unit mix** – As set out within Chapter 4 of this Addendum Statement, the Revised Scheme proposes a revised unit mix which delivers more small units. This revised mix has been developed partly as a result of the reduction of the size of the basement and the on-site car parking. The re-configuration of some of the residential buildings to provide smaller units increases the overall unit number total.

This is demonstrated if the habitable rooms across the Site are compared – in the Original Scheme, the scheme proposed circa 2,699 habitable rooms¹⁴, and the Revised Scheme proposes 3,625 habitable rooms¹⁵, which represents a 34% increase (compared to the 54% increase in unit numbers).

- iv **Conversion of non-residential uses** – The Revised Scheme has converted some non-residential buildings into residential uses. The care home (Blocks 14 and 15) and gym (Block 5) have been omitted from the scheme. This has enabled more residential units to be delivered.

9.15 It can be seen from the above that the increase in unit numbers and associated increase in density across the Site has been driven by a range of factors, one of which is increasing building heights in appropriate locations.

¹⁴ 3.32 habitable rooms multiplied by 813 units – see Table 8 – figures are based on average hab room across the site / an up to residential unit number

¹⁵ 2.90 habitable rooms multiplied by 1,250 units – see Table 9 – figures are based on average hab room across the site / an up to residential unit number

- 9.16 It is therefore considered that whilst the Revised Scheme does go above the density matrix as set out in the current adopted London Plan, the density proposed is appropriate for the context. The scheme therefore optimises the capacity of the Site and should be considered acceptable in this regard.

Unit Mix

Planning Policy

- 9.17 The planning policy position in respect of unit sizes remains as per the Original Submission. Whilst the ITP London Plan has since been published, draft Policy H10 follows the same principles of adopted London Plan Policy 3.8 in that developments should provide a range of housing sizes, taking into account local need. At a local level, LBRuT Local Plan Policy LP 35 states that residential development should generally provide family sized accommodation (which LBRuT classify as including 2-bedroom units which accommodate 3 or 4 people). It is acknowledged that in Areas of Mixed Use (where the Site is located), **“a higher proportion of small units would be appropriate”**.

Assessment

- 9.18 The indicative residential mix for the Original Scheme and the Revised Scheme is set out in Table 4 of this Addendum Statement.
- 9.19 The unit mix for the social rent for the Revised Scheme is broadly consistent with that of the Original Scheme. On the basis of the indicative mix set out within the submission (which is subject to change and further negotiation with the GLA), the proportion of 3 bed+ units remains as per the Original Scheme.
- 9.20 The indicative intermediate mix has shifted towards a number of larger family sized units compared with the Original Scheme. As set out within the submitted Affordable Housing Statement Addendum, two thirds of the one and two bed intermediate units will be affordable to households earning £47,000 per annum, in line with locally set income thresholds. Therefore, it is considered that this mix amendment should be acceptable.

- 9.21 In terms of the private accommodation, the proportion of 3 bed + accommodation has reduced compared to the Original Scheme. This is to represent a mix which is more reflective of the market.
- 9.22 It is considered that the Revised Scheme continues to comply with relevant planning policy in terms of unit mix. Based on the indicative mix, 69% of units would be 'family sized' in line with LBRuT's definition and it is acknowledged that the Site is within a location where an element of smaller units (1 bed and studios) would be required.

Unit Sizes

Planning Policy

- 9.23 Minimum space standards for residential units are set out within the Nationally Described Space Standards 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.
- 9.24 Developers are encouraged to exceed these standards to deliver good quality housing (Mayor's Housing SPG at paragraph 2.3.25, and ITP London Plan at paragraph 3.6.2). Paragraph 3.6.2 of the ITP London Plan goes on to state that "**consideration should be given to the elements that enable a home to become a comfortable place of retreat**".
- 9.25 Balanced against the need to deliver good quality new housing, the ITP London Plan encourages boroughs to resist dwellings with floor areas significantly above the minimum standards for the number of bedspaces they contain due to the need to optimise housing delivery (paragraph 3.6.2). No guidance is provided for what constitutes dwellings being 'significantly' above the minimum standards, but it is clear that the policy intent is to make efficient use of land and maximise housing delivery.

Assessment

- 9.26 All of the new homes would continue to meet the Nationally Described Space Standards, in line with LBRuT and GLA planning policy requirements.
- 9.27 The Applicant worked closely with LBRuT throughout the determination of the Original Scheme to reduce the size of units where this was possible. This same logic has been applied to the Revised Scheme. There is a need for affordable housing across London.

Planning policy dictates that residential development should deliver the maximum reasonable affordable housing on site. In order to do this whilst efficiently using land, the scheme must maximise value where possible. It is considered that the Revised Scheme continues to provide an appropriate mix of accommodation whilst balancing the need to maximise value to support the delivery of affordable housing and therefore complies with policy objectives on this matter.

Housing Quality

Planning Policy

- 9.28 In terms of policy changes of note, the ITP London Plan builds on Policy 3.5 in the London Plan to deliver housing developments of the highest quality. Draft Policy D5 requires accessible and inclusive design, and ITP London Plan draft Policy D6 sets out detailed design requirements, with residential developments required to meet the minimum standards set out in part F of the policy. Many of these requirements build upon the Mayor’s Housing SPG (March 2016).
- 9.29 The local policy position has not changed, and the Revised Scheme has taken into account LBRuT’s Local Plan Policy LP 8 and LBRuT’s Residential Design Standards SPD (March 2010).

Assessment

- 9.30 As per the Original Scheme, the Revised Scheme has been designed in line with relevant national, Mayoral and LBRuT housing standards.
- 9.31 The submitted Design and Access Statement Addendum sets out an assessment of the proposed residential units against the Mayor’s Housing SPG (2016) and ITP London Plan draft Policy D6. We set out below a high-level assessment against the key residential design policy requirements:
- i **Aspect and privacy** – In line with requirements, the number of dual aspect units has been sought to be minimised. A small proportion of units (6.8%) in Development Area 1 (applied for detail) are single aspect and north facing, which is considered to be minimal and acceptable in the overall context of the development.

The proposed floor layouts have been set to maximise views and protect privacy between buildings. The building footprints in Development Area 1 are broadly unchanged from the Original Scheme. The majority of buildings are separated by 15m or more. In occasional circumstances where the separation distances are below 15m, Squire & Partners have introduced design techniques to ensure that privacy is maintained.

In respect of Development Area 2 (applied for in outline), the residential layouts are yet to be designed in detail. Generally, the street widths between buildings are wide and dwellings would have adequate privacy standards. Where buildings do face on to each other, habitable rooms would be positioned and occluded windows would be provided to help limit overlooking issues. The revised Design Code, prepared by Squire & Partners, sets out rules for ensuring residential units have adequate privacy. Detailed residential layouts would be considered via submission of Reserved Matters.

As with the Original Scheme, there are instances where separation distances at the site fall short of the 13.5 metres set out in paragraph 4.8.8 of the LBRuT Local Plan in the Revised Scheme. The LBRuT Planning Committee notes that, despite criticisms, **“it is acknowledged that a significant proportion of units benefit from exceptional levels of outlook”** and that on balance the accommodation was deemed acceptable.

Given that the scheme would provide adequate privacy for residential units through building distances and design techniques, it is considered that the Revised Scheme is acceptable in respect of privacy.

- ii **Daylight / Sunlight** – The Revised Internal Daylight and Sunlight Report, prepared by eb7, clearly demonstrates that all proposed residential units coming forward in detail will have sufficient internal daylight levels. In respect of the outline elements of the scheme, façade studies have been undertaken which show that the majority of areas are likely to achieve high levels of daylight / sunlight.
- iii **Accessibility** – In line with the Mayor’s Housing SPG, 90% of the residential units within the detailed element of the Site will be provided as accessible and adaptable dwellings, with the remaining 10% provided as wheelchair user dwellings. Entrances, access to refuse stores and relationship to car parking (where relevant)

have been designed to provide inclusive access. Mandatory requirements included within the Design Code will ensure inclusive access for the units within the outline component.

- iv **Shared Circulation** – 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 substituted Housing Assessment Matrix, prepared by Squire and Partners, demonstrates that the vast majority of the residential cores fully comply with the Mayor’s SPG. Where there are instances of cores serving more than 8 units, this is fully set out and justified in the Design and Access Statement Addendum at section 7.5.1.

- v **Private amenity space** – The majority of units within the detailed element will be provided with private amenity space in line with the standards set out in the Mayor’s Housing SPG and ITP London Plan draft Policy D6. Variances from this standard relate mainly to the Maltings Building, where heritage constraints limit the ability to provide private balconies. There are also other instances across the detailed element of the Site, but these are limited and given the provision of green open space in the close vicinity, it is considered that the scheme would deliver sufficient amenity space for residents. For the outline elements, the Design Code includes a mandatory requirement for balconies to provide the minimum amount of amenity space required.

9.32 For the reasons outlined above, it is considered that the Revised Scheme complies with the London Plan and local policy requirements to provide high quality, well designed, new homes for all tenures.

10 Design and Layout

- 10.1 Planning policy at a national, strategic and local level continues to require development to create high quality buildings and places in which people want to live and work.
- 10.2 The ITP London Plan is consistent with the adopted London Plan in terms of requiring good growth and high-quality architecture. Draft Policy D4 provides more detail in respect of how masterplans should be developed to ensure they deliver high quality design, and what should be submitted alongside planning applications. Part D requires development proposals which include a residential component of over 350 units per hectare or a tall building to have undergone at least one design review early on in the scheme preparation. The Revised Scheme includes tall buildings. Whilst the scheme has not undergone a formal design review, it should be noted that the Revised Scheme is the result of a significant period of pre and post submission consultation with borough and GLA planning and design officers, as well as other relevant officers and local stakeholders. It is therefore considered that the Revised Scheme complies with the aims of draft Policy D4 which seek to achieve good growth across London.
- 10.3 Broadly speaking, the approach to the character areas, design typology and proposed materials remains as per the Original Scheme. This approach was assessed in the February 2018 Town Planning Statement and considered acceptable in planning policy terms. No changes in planning policy affect this conclusion and therefore this element is not re-assessed within this section.
- 10.4 This section will consider the proposed changes to the design and layout of the scheme and assess these changes against relevant planning policy.
- 10.5 The Revised Scheme continues to deliver a scheme of well-considered and high-quality architecture which is entirely appropriate for its location and context. The masterplan and architectural approach has been carefully considered and designed to respond to the local area and in particular provide an enhancement of views of the Site from the river front.
- 10.6 The principal changes to the design of the scheme as a result of the amendments are set out as follows:

- i Increase in some building heights;
- ii Re-configuration of blocks 18, 19, 20 and 21;
- iii Minor footprint changes to blocks 2, 3, 7, 8, 11 and 12 as a consequence of aesthetic refinements;
- iv Block 22 (previously Block 21) has reduced from 8 to 7 units;
- v Internal layout changes;
- vi Elevational and façade amendments, principally driven by the amendments in height for some of the buildings; and
- vii Reduction in size of western basement and introduction of basement level -2 in Block 1 (cinema block).

10.7 This section considers the following:

- i Increase in building heights
- ii Reconfiguration of blocks and minor footprint changes
- iii Reduction in Proposed Basements
- iv Fire Strategy

Increase in Building Heights

Planning Policy

10.8 LBRuT set out in the Local Plan (para 4.2.3) that a ‘tall’ building is 18m or higher. Paragraph 4.2.2 identifies Mortlake Brewery as a site where ‘tall’ buildings may be appropriate subject to meeting the criteria set out in Policy LP 2. The principle of erecting tall buildings at the Site was established during the consideration of the Original Scheme. No changes in planning policy affect that conclusion. The matter for consideration, therefore, is whether the increase in building heights proposed in the Revised Scheme is acceptable.

Assessment

- 10.9 The proposed heights will therefore need to be assessed against relevant planning policy. This includes adopted London Plan Policy 7.7, ITP London Plan draft Policy D9, LBRuT Local Plan Policy LP 2 and site-specific guidance contained within the Stag Brewery Planning Brief. The planning policies do not dictate specifics on building heights, and instead require that applications for tall buildings are developed giving due consideration to the local context and character, and consider their visual, functional and environmental impacts. Appendix 1 of the Stag Brewery Planning Brief indicates maximum heights that would generally be acceptable across the Site.
- 10.10 Appendix A of this Addendum Statement sets out the proposed building heights in the Original and the Revised Scheme. In summary, the Revised Scheme proposes an increase in height for some buildings, of up to three storeys compared to the Original Scheme. The Design and Access Statement addendum includes a detailed analysis of the proposed building heights.
- 10.11 The increased building heights have been carefully considered to ensure that they are appropriate given the Site's context, in line with adopted London Plan Policy 7.7, ITP London Plan draft Policy D9 and LBRuT Local Plan Policy LP 2. Visually, taller elements have been located centrally and buildings visible from the river have had their massing broken up. In terms of the existing built environment, the Maltings building's prominence in views has been respected, with height increase nearby limited.
- 10.12 The cumulative impact of the increased height to the proposed buildings in the Revised Scheme has been thoroughly tested by Waterman through the preparation and assessment of revised townscape views. The revised views show that the increased massing does not abruptly rise above the level of the adjacent townscape and sits at the height that is very similar to the existing buildings on Site. Waterman's townscape assessment has found that the form and extent of the development is still considered to be beneficial in impact as originally assessed for the Original Scheme.
- 10.13 In terms of functionality, the buildings remain designed to be safe and accessible. The increase in floor area has generated an increase in cycle parking requirements, and this has been accommodated across the Site in line with ITP London Plan draft standards.

- 10.14 In terms of environmental impacts, Waterman’s Environmental Statement Addendum (“ES Addendum”) has fully considered the revised building heights on a range of environmental matters, including wind and daylight and sunlight. These matters are set out in section 15 of this Addendum Statement but in summary are considered acceptable in terms of impacts.
- 10.15 The proposed building heights would go beyond the guidelines set out in the Stag Brewery Planning Brief (as per the Original Scheme). A detailed assessment against the Brief has been included within the Design and Access Statement addendum. It should be noted that the Brief is planning guidance from 2011 and greater weight should be applied to adopted planning policy.
- 10.16 The Site continues to be a location where tall buildings may be considered acceptable in planning policy terms. Whilst the Revised Scheme extends beyond the guidelines set out in the Site’s Planning Brief, the heights are considered entirely in accordance with relevant planning policy as they have been informed by a thorough understanding and appreciation of the site context, taking into account the impact on the surrounding townscape and the environment. The additional mass will enable the development to increase the amount of housing, including affordable housing, that can be delivered, in line with other policy objectives.

Reconfiguration of blocks and minor footprint changes

Planning Policy

- 10.17 There are no planning policy changes of relevance in respect of the re-configuration of the proposed blocks.

Assessment

- 10.18 The main changes in terms of layout are to Development Area 2 where slight changes proposed to the footprints of Blocks 18 and 19 and the replacement of Blocks 20 with two buildings with a slightly deeper floor plate to allow apartments to be introduced. Other very minor changes to footprints have occurred as a consequence of aesthetic refinements to the mansion typology that is applied to Blocks 2, 3, 7, 8, 11 and 12 within Development Area 1.

10.19 It is not considered that the minor changes to the building footprints affect the conclusions reached in respect of the Original Scheme that the layout across the Site was an acceptable masterplan approach. The changes to the building layouts in Development Area 2 have been considered for their impact in respect of privacy, daylight / sunlight and other environmental factors including wind and trees. As these elements are considered acceptable, it is considered that the re-configuration of the buildings should be acceptable in planning policy terms.

Reduction in Proposed Basements

Planning Policy

10.20 There are no planning policy changes of relevance in respect of basements.

Assessment

10.21 The scheme will continue to provide a single storey basement under the majority of the Site. The basement extent underneath the western element (Development Area 2) has been significantly reduced. The basement remains broadly the same for Development Area 1, aside from minor changes and the introduction of a second level of basement beneath Block 1 (the cinema). The external manifestations of the basement will remain as per the Original Scheme.

10.22 Revised technical assessments have been submitted which consider the impact of the amended basement, including the additional storey beneath Block 1. These reports conclude that the basement is acceptable in terms of drainage, archaeology and structures. It is therefore considered that the revised basement design should be acceptable in planning policy terms.

Fire Strategy

Planning Policy

10.23 The ITP London Plan introduced draft Policy D12 which states that all development proposals should be accompanied by a Fire Statement and must achieve the highest standards of fire safety.

Assessment

- 10.24 The Original Scheme did not include the submission of a Fire Statement. The Design and Access Statement addendum confirms that the fire strategy proposed within the Original Scheme will remain under the Revised Scheme. All proposed building layouts have been reviewed by Hoare Lea to ensure escape distances meet minimum requirements. Hoare Lea have provided a Fire Statement which has been prepared in line with the requirements of draft ITP London Plan Policy D12.

11 Public Realm, Landscaping and Design of Open Spaces

- 11.1 Broadly speaking, the planning policy position in respect of public realm, landscaping and the design of open spaces remains the same as during consideration of the Original Scheme. The only policy changes of note are in respect of the emerging London Plan. The GLA has updated its population calculator, which affects the child yield calculation which subsequently affects the amount of playspace schemes are required to provide. The ITP London Plan has also introduced an Urban Greening policy (draft Policy G5) which promotes schemes to consider their Urban Greening Factor (“UGF”).
- 11.2 The approach to the public realm and landscaping masterplan remains as per the Original Scheme. Given there are no policy changes which would affect the conclusions reached in the assessment of the Original Scheme on this matter, the public realm and landscape principles are not re-assessed here and are continued to be considered acceptable.
- 11.3 This section will consider the proposed changes to the public realm, landscaping and open space and assess these changes against relevant planning policy. The Revised Scheme proposes some minor amendments to the proposed landscape masterplan as a result of the change to some of the building footprints and increase in residential unit numbers. These amendments are set out in full in the submitted revised Landscape Design and Access Statement, prepared by Gillespies. In summary, the principal changes are as follows:
- i The amount and location of playspace has changed due to the increase in residential unit numbers;
 - ii Revised landscaping layouts have been developed as a result of block re-configurations, and minor amendments to pedestrian and road layouts;
 - iii Changes have been made to the cycle parking provision, in order to accommodate the increased requirements;
 - iv Due to the re-configuration of Blocks 20 and 21, canopy reductions will be required to four existing trees on Site;
 - v No amendments are proposed to the physical works proposed under Application C, although alternative options within the highway boundaries for mitigating the

highway impact of the amended proposals have been assessed within the relevant substitution documents for Applications A and B and are the subject of ongoing discussions with the GLA and TfL. Each option would have different effects on the number of trees to be removed / works to designated OOLTI land at Chertsey Court, all of which have been assessed in the submitted documents.

11.4 This section considers the following:

- i Playspace
- ii Open Space / Greening
- iii Trees

Playspace

Planning Policy

11.5 Since the submission of the Original Scheme, the policy position in respect of playspace has not changed, with ITP London Plan draft Policy S4 requiring development to increase opportunities for play and informal recreation and provide at least 10 sqm of playspace per child. The playspace should be stimulating, integral to the neighbourhood, incorporate greenery, enable passive surveillance and not be segregated by tenure.

Assessment

11.6 The Revised Scheme has re-considered the playspace provision on Site to ensure that adequate supply is provided in line with London Plan and LBRuT planning policy.

11.7 Gillespies have re-calculated the playspace provision required using the GLA's 2019 population calculator (rather than the 2014 calculator which was used for the Original Scheme). The scheme would provide 7,520 sqm playspace, which is in excess of the GLA requirement of 6,461 sqm (based on the 2019 population calculator). This is 22sqm below the LBRuT target of 7,542 sqm. However, it should be noted that 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 10,365 sqm of playspace, which is significantly above the higher LBRuT target. It is considered appropriate to include the sports facilities in the playspace calculations on the basis that there will be

a Community Use Agreement in place which would allow use of these facilities by the local community in the evenings and at weekends. It is therefore considered that the quantum of playspace provided is in line with policy.

- 11.8 In terms of the form of playspace, 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 the circulation spaces and public realm areas. The school play facilities (indoor and outdoor) would also be available for use by children of the residential development as play facilities, via the Community Use Agreement which would secure community access to these spaces out of school hours.
- 11.9 The Revised Scheme has re-considered the layout and location of the playspace to ensure that the spaces provided are well designed. In particular, eb7 have given consideration to the playspaces to ensure that they are well lit (in terms of sunlight). eb7's assessment (included in the submitted ES Addendum) show that the majority of all proposed amenity areas would be well lit.
- 11.10 It has been demonstrated that adequate and well-designed playspace will be provided in the Revised Scheme, in accordance with planning policy.

Open Space / Greening

Planning Policy

- 11.11 In terms of policy changes since the Original Scheme, the only policy of note is the ITP London Plan draft Policy G5, which sets out the approach in respect of the UGF, where there is a target score of 0.4 for developments that are predominately residential.

Assessment

- 11.12 The Revised Scheme has not significantly altered the approach to open space and greening – the scheme still proposes a significant amount of greening throughout. A UGF assessment has been provided within the revised Landscape Design and Access Statement for completeness. The Assessment sets out that the scheme achieves a score of 0.15. Whilst this is not meeting the target score, it should be noted that the scheme has significantly increased the amount of green space on the Site.

- 11.13 As set out within the submitted Open Space and Playing Pitches Assessment Addendum, the Revised Scheme proposes an increase in total publicly accessible amenity open space of 4,744 sqm (from 38,943 sqm to 43,687 sqm) which is mainly as a result of the additional green space now being proposed at the rear of Blocks 20 and 21, which was previously proposed as private space. In terms of actual 'green' space, this has increased by 815 sqm, from 8,499 sqm to 9,314 sqm.
- 11.14 This quantum of publicly accessible open space should be measured against the existing baseline which is 0 sqm. Whilst the Site is used by local groups for sports (including Barnes Eagles whose use of the playing fields is proposed to be safeguarded), the Site is not publicly accessible. The Revised Scheme will provide a range of open and green spaces throughout which will offer new and existing residents a range of functions. The Green Link will continue to provide an expansive route from Mortlake Green through to the river and open up this previously closed Site. It is therefore considered that the Revised Scheme complies with the aims of planning policy to provide accessible and welcoming green and open spaces throughout.
- 11.15 The Addendum considers the Revised Scheme amendments to Applications A and B. An assessment of the proposals under Application C, which would affect designated OOLTI land at Chertsey Court is included within the Open Space and Playing Pitches Assessment (May 2019), which remains a submission document submitted for consideration.

Trees

Planning Policy

- 11.16 There have been no changes to the adopted London Plan policy or LBRuT's Local Plan policy in respect of trees. ITP London Plan draft Policy G7 at part I is clear that development proposals should ensure that, wherever possible, existing trees of value are retained and that if planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, CAVAT or another tree valuation system as deemed appropriate. This draft Policy is further clear that the planting of additional trees should generally be included in new developments.

Assessment

- 11.17 In respect of trees, a revised Arboricultural Statement has been submitted with the substitution pack which considers the Revised Scheme. The Statement also updates the tree survey information. The Revised Scheme does not propose any more trees to be removed on the Stag Brewery Site (Applications A and B) compared to the Original Scheme. In excess of 400 new trees will be planted, which is the same for the Stag Brewery site as the Original Scheme, with 3 new trees being planted in the north-west corner of the site.
- 11.18 The only difference between the Original Scheme and the Revised Scheme in terms of existing trees on the Stag Brewery Site is that four additional trees will require canopy reductions. This is due to the re-configuration of Blocks 20 and 21. The trees comprise one A-grade tree, one B-grade tree and two C-grade trees. The Arboricultural Statement sets out that the Revised Scheme is not considered to result in a significant impact to the A-grade tree. The Statement goes on to set out how retained trees would be protected. It is therefore considered that this minor amendment should be considered acceptable.
- 11.19 The revised Arboricultural Statement considers the four alternative highway options around Chertsey Court, which are the subject of ongoing discussions with the GLA and TfL. Of the four alternative highways options proposed, the Chalkers Corner Light option would require the removal of one tree. The loss of the tree would be compensated by the re-planting of an additional two trees.
- 11.20 As the Arboricultural Statement is a revised document, an Addendum Note has been included at Appendix G which assess the Arboricultural impact of Application C.
- 11.21 The amendments to the scheme are considered acceptable in line with planning policy. Whilst there is a loss of trees to facilitate the Site's redevelopment, any harm caused should be considered acceptable on the basis that suitable re-planting has been identified.

12 Transport, Parking, Construction and Servicing

- 12.1 In respect of planning policy, the only change to the position which was considered in the assessment of the Original Scheme has been the formal adoption of the LBRuT Local Plan, the revisions to the NPPF and the publication of the ITP London Plan. The high-level approach of planning policy remains as per the Original Scheme submission in that developments should prioritise and promote sustainable modes of travel.
- 12.2 The principal changes to the Revised Scheme in respect of transport are set out as follows:
- i Reduction in the size of the western basement and associated reduction of 186 car parking spaces;
 - ii Increase in number of cycle parking spaces;
 - iii Minor amendments to pedestrian, vehicle and cycle access routes across the Site;
 - iv Amendment to the proposed highways works;
 - v Reduction in the anticipated car trips from the school as a result of a revised school Travel Plan; and
 - vi Minor amendments to proposed land uses in the scheme.
- 12.3 In respect of the highways works, as set out in section 4 of this Addendum Statement, no amendments are proposed to the physical works proposed under Application C, although alternative options within the highway boundaries for mitigating the highway impact of the amended proposals have been assessed within the relevant substitution documents for Applications A and B and are the subject of ongoing discussions with the GLA and TfL. The four alternative highways options have been presented in the relevant submission documents.

- 12.4 The Further Transport Assessment Addendum and the Environmental Statement Addendum also consider Application C (‘referred to as ‘Option 5’) in the context of the other scheme changes proposed under Applications A and B.
- 12.5 The trip generation figures have been reviewed as a result of the LBRuT Committee resolution, changes to the School Travel Plan, and the Revised Scheme amendments. The revised trip generation figures have been approved by TfL.
- 12.6 The submitted Further Transport Assessment Addendum, prepared by Stantec, sets out in full the transport impacts arising as a result of the Revised Scheme. This section considers the key implications for the following matters against relevant planning policy:
- i Highways Impacts
 - ii Car parking
 - iii Cycle Parking and Pedestrian Access
 - iv Rail
 - v Bus
 - vi Construction
 - vii Delivery and Servicing
 - viii Operational Waste

Highways Impacts

Planning Policy

- 12.7 Planning policy (ITP London Plan draft Policy T1) sets out that development should make the most effective use of land, reflect its connectivity and accessibility and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.

Assessment

- 12.8 As the Revised Scheme changes the quantum of development on the Site, the Further Transport Assessment Addendum has re-considered the impact of the development on the local highway network. The Revised Scheme would result in a reduction of vehicular trips generated compared to the Original Scheme as a result of the reduced size of the western basement car park. Notably while there will be an increase in the number of trips at peak times overall there will be a decrease in the number of vehicle trips generated by the development.
- 12.9 Notwithstanding this, the scheme will still generate vehicle trips and as a result a range of highways mitigation measures are proposed. These are largely the same as the Original Scheme with the exception of the alternative highways options which have been presented within the substituted documents (albeit that Application C still remains ‘live’ and an available option within the development proposals). As set out in the submitted Further Transport Assessment Addendum, the transport strategy remains to be to encourage sustainable modes of travel to reduce highways and environmental impacts.
- 12.10 It is therefore considered that the Revised Scheme complies with planning policy objectives to support and promote sustainable modes of travel and mitigate any impacts on the highway network.

Car Parking

Planning Policy

- 12.11 The ITP London Plan proposes a revision to the car parking standards. Revised standards are included in draft Policies T6, T6.1, T6.2, T6.3, T6.4 and T6.5. The Revised Scheme has been considered against adopted LBRuT and London Plan policy as well as the emerging London Plan.

Assessment

- 12.12 The Revised Scheme results in a reduction in car parking by 186 spaces. The majority of car parking for the Revised Scheme remains in the basement. There will be no parking provision at street level for any land use, with the exception of the spaces for the townhouses in Block 22 and 15 spaces at grade for the school.

- 12.13 The proposed levels of residential car parking (400 at basement and 7 townhouse parking spaces) represents a parking ratio of 0.33 which is well within the London Plan standards for a development in Outer London. The ITP London Plan sets a maximum parking ratio of 0.75 for developments in Outer London (PTAL 2-4). The Revised Scheme seeks to reduce the impact of the development on the surrounding highway network and further encourage residents and visitors to travel either actively or via public transport. This is in accordance with London Plan Policy 6.13, LBRuT Local Plan Policies LP 44 and 45 and the relevant emerging draft London Plan policies.
- 12.14 As per the Original Scheme, 20% of car parking spaces would be provided with active electric charging provision, and 100% provided with passive electric charging provision.

Cycle Parking and Pedestrian Access

Planning Policy

- 12.15 Both the current London Plan and LBRuT's transport planning policies require development to provide cycling facilities. London Plan Policy 6.9 (Cycling) and Local Plan LP 44 and Table 13.1 remain relevant to the proposals. The ITP London Plan at draft Policy T5 (Cycling) altered the cycle parking requirements compared to the adopted London Plan. The GLA Stage 1 report for the Original Scheme (paragraph 91) set out that the Applicant should **“aspire to meet the draft London Plan standards for all uses.”**

Assessment

- 12.16 Overall, the total cycle spaces to be provided has been increased from 1,754 (long stay) and 197 (short stay) in the Original Scheme to 2,582 (long stay) and 302 (short stay) in the Revised Scheme. The proposed total of 2,582 long stay cycle parking spaces is in greater than the minimum required number of spaces as specified in the ITP London Plan.
- 12.17 The majority of the short stay cycle parking will be accommodated within the landscaped areas (except for those related to Block 18, as detailed in the Further Transport Assessment Addendum) while the long stay cycle parking will be located in secure parking facilities within the building and basement.

12.18 The Revised Scheme has also made a number of minor changes to the scheme layout in highway terms in order to improve the safety and accessibility of the Site for pedestrians and cyclists.

12.19 It is considered that the substitution proposals therefore meet planning policy in respect of cycle parking and pedestrian access, in particular the cycle requirements set out in ITP London Plan draft Policy T5.

Rail

Planning Policy

12.20 There are no planning policy changes of relevance specifically in respect of rail.

Assessment

12.21 Whilst not considered necessary to mitigate the development, the Original Scheme included a draft obligation for the scheme to fund a package of improvement works to the Mortlake level crossing. Network Rail commented on the Original Scheme to say that they had no objections subject to the Applicant funding the proposed level crossing upgrades and any changes to the level crossing vehicle stop lines being agreed with the Office for Rail and Road.

12.22 The Revised Scheme does not propose any amendment to the level crossing works or this agreement.

12.23 In terms of considering impact on the level crossing as a result of the Revised Scheme amendments, the Transport Assessment Addendum concludes that the increase in rail and underground trips is considered to be mitigated in capacity terms by the new trains that have been introduced on the network for trains leaving Mortlake Train Station. The new trains have provided an increased capacity on the network, while retaining journey times into London and other key destinations.

Bus

Planning Policy

12.24 There are no planning policy changes of relevance specifically in respect of buses.

Assessment

- 12.25 There are no changes to the wider public transport strategy from the Original Scheme.
- 12.26 In consultation with TfL, it has been agreed that a payment towards bus enhancements is appropriate for the increase in bus trips predicted from the development. This will mitigate the proposed development.

Construction

Planning Policy

- 12.27 Both the adopted London Plan Policies (5.18, Construction, excavation and demolition waste and 6.14, Freight) and LBRuT's Local Plan Policies (LP 10, LP 24 and LP 44) remain relevant. ITP London Plan draft Policy T7 builds on the adopted London Plan policies but does not change the policy objectives.

Assessment

- 12.28 As per the Original Scheme, the Revised would be carried out in phases. A revised Framework Construction Management Statement, prepared by Aecom, has been prepared which responds to the requirements of LBRuT Local Plan Policy LP 10 in respect of the Revised Scheme. It provides details of how the construction process would be managed to protect neighbour amenity and local transport networks.
- 12.29 The transport impacts of construction waste and trips on the local highway network as a result of the Revised Scheme has also been re-considered in ES Addendum. The addendum concludes that the impact of the construction works would be insignificant.
- 12.30 It is considered that relevant planning policy has been satisfied in respect of construction, on the basis that documents have been provided which evidence how the scheme will minimise disruption to the local highway network and the local area.

Delivery and Servicing

Planning Policy

- 12.31 There have been no changes to the objectives of planning policy in terms of delivery and servicing. Deliveries are still expected to provide adequate space for servicing and storage, with servicing to be off street where possible.

Assessment

- 12.32 The Revised Scheme would result in a change to the number of delivery and servicing trips. Due to the increase in the number of units and amendments to the non-residential land uses the number of delivery and servicing trips will increase compared to the Original Scheme.
- 12.33 A revised Framework Delivery and Servicing Management Plan has been submitted with the substitutions.
- 12.34 The strategy for waste and servicing continues to be to minimise vehicular trips and impact on the local highway network, in line with relevant policies and guidance. It is considered that the Revised Scheme continues to demonstrate that the scheme would create no severe impacts on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents, in line planning policy.

Operational Waste

Planning Policy

- 12.35 Adopted planning policy continues to require suitable waste and recycling storage facilities in all developments and for development to minimise waste and improve commercial recycling/composting levels. ITP London Plan draft Policy S17 sets waste requirements to assist in reducing waste.

Assessment

- 12.36 A revised Operational Waste Strategy (“OWS”), prepared by Stantec, has been submitted in support of this substitution pack. The OWS has been updated to reflect the amendment in residential units and land uses as a result of the Revised Scheme. The document has also considered the relevant changes in planning policy in respect of the emerging London Plan.
- 12.37 Overall, waste generated by the operation of the Revised Scheme development will be managed in the same manner as the Original Scheme and in an appropriate and

sustainable way. It will follow the principles of the Mayor's Waste Hierarchy 'eliminate, reduce, reuse, recycle' to enable the environmental, social and economic risks from waste to be reduced and national and local policy aspirations to be supported.

13 Heritage and Townscape

Heritage

Policy

- 13.1 The statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990 (Section 66 and 72) remain relevant and should be applied by the decision maker in the assessment of the Revised Scheme.
- 13.2 In terms of planning policy changes since the consideration of the Original Scheme, there have been no substantial changes in policy direction. The revised NPPF (2019) includes updates to the policies regarding conserving and enhancing the historic environment. The policies set out in paragraphs 195 and 197 relating to identification and assessment of harm are not substantially changed from the previous NPPF against which the Applications have been assessed to date.
- 13.3 At a strategic and local level, planning policies continue to require development to retain and enhance historic assets. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate (London Plan Policy 7.8) with regeneration schemes making use of heritage assets (London Plan Policy 7.9). ITP London Plan draft Policy HC1 echoes the same requirements. At a local level, Local Plan Policies LP 3 (Designated Heritage Assets), LP 4 (Non-Designated Heritage Assets) are in line with national and strategic policy in respect of heritage assets.
- 13.4 This section assesses the Revised Scheme in terms of heritage against the relevant statutory tests and adopted planning policy at all levels. The Revised Scheme incorporates amendments to building heights and re-configuration of building layouts. As set out within the submitted ES Addendum, a number of other minor changes have been made in respect of heritage.
- 13.5 The designated heritage assets on Site include the Former Bottling Building and the Former Hotel Building (Block 5), the Maltings Building (Block 4), which are all Buildings of Townscape Merit. The Site is also within the Mortlake Conservation Area. As per the Original Scheme, the Revised Scheme will retain the Maltings Building and will retain the façades of the Former Bottling Building and Former Hotel Building.

- 13.6 The Site lies within an area which contributes to the setting of a number of listed buildings and the Mortlake Green Conservation Area to the south.

Assessment – Environmental Assessment

- 13.7 The ES Addendum considers the direct and indirect effects of the Revised Scheme on the built heritage assets both during construction and from the completed development.
- 13.8 Waterman conclude that there are no changes to the assessment of the impacts on heritage during the construction period.
- 13.9 In terms of direct effects from the completed development, the Revised Scheme presents an improvement to all the heritage assets (apart from the Mortlake Conservation Area) on Site compared to the assessment set out within the 2018 Environment Statement. The benefits achieved relate to minor amendments to the works to the Buildings of Townscape Merit.
- 13.10 In terms of indirect effects to the buildings on the Site, the changes to the assessment are as a result of the change to the setting of the heritage assets (which relate to increased building heights). The only change to the previous conclusions for the Original Scheme is in respect of the Maltings Building (Block 4), where a minor adverse impact has been identified, compared to a previous minor beneficial impact assessment. Waterman set out that the impact is driven by the increased building heights reducing the prominence of the Maltings Building, although this should be considered in the context of the large brewery buildings which were located on the Site in the latter half of the 20th century. It should also be noted that the Revised Scheme has sought to reduce heights around the Maltings Building to maintain prominence.
- 13.11 In terms of indirect effects to the Conservation Areas and nearby listed buildings, Waterman have concluded that the magnitude of impact has changed from minor beneficial to neutral in all instances apart from the Mortlake Conservation Area which has changed to minor adverse. The residual effects all remain as insignificant, aside from the Mortlake Conservation Area which is considered to have an indirect, long-term, local adverse effect of minor significance.

Assessment – NPPF Tests

- 13.12 ‘Non-designated’ heritage assets as per the NPPF include locally listed buildings, i.e. Buildings of Townscape Merit. Paragraph 197 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determination. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 13.13 Whilst Waterman’s heritage assessment identified harm to the Maltings Building, benefits have also been noted given the existing poor condition of the building and the need for intervention in the near future to provide a sustainable future. Waterman therefore conclude that there is no overall harm to non-designated heritage assets. Waterman therefore conclude that the scale of overall harm to the heritage assets is outweighed by the effect of the completed Development.
- 13.14 Designated heritage assets include listed buildings and Conservation Areas (but not locally listed buildings). The NPPF requires an assessment of ‘harm’ from development proposals against designated heritage assets. Paragraph 196 sets out that where development proposals lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal.
- 13.15 Waterman have confirmed that a limited amount of harm has been identified to the Mortlake Conservation Area. This harm is very specific and relates to the increased heights of the buildings detracting from the prominence of the Maltings Building (in the context of the Conservation Area). In the context of the NPPF, Waterman consider this harm to be ‘less than substantial’.
- 13.16 Therefore, paragraph 196 of the NPPF must be satisfied in that this harm must be balanced against the public benefits of the Revised Scheme. The public benefits of the scheme are substantial and wide ranging, and it is considered that these benefits outweigh the less than substantial harm caused to the Mortlake Conservation Area. The public benefits resulting from the Revised Scheme are as follows:
- i Up to 1,250 new homes across the Site, providing an appropriate mix of units, tenure types and sizes, and making a positive contribution to the housing shortfall

and overall need as identified by the ITP London Plan, and which will help to support London's growth as a world class city.

- ii Of these 1,250 new homes, the scheme will provide up to 356 additional affordable housing units, which will provide a unique opportunity to maximise the delivery of affordable housing provision across the borough, to deliver for a more varied type of housing and for different levels of affordability. This will also help make a positive and significant contribution towards overall need for housing and ensure that the redevelopment of the Site will contribute positively to the creation of mixed and inclusive communities.
- iii Delivery of a new 6 form entry secondary school, with a capacity to provide secondary school places for 1,260 pupils. This will ensure that there is an adequate supply of good quality education and childcare facilities to help meet the growing need for secondary school places across London, in accordance with draft paragraph 5.3.5 of the ITP London Plan, whilst offering greater educational choice.
- iv Mix of high street uses including 5,523 sqm of office space, a new cinema and up to 5,203 sqm of flexible uses (retail, restaurant, leisure, community). This will help to support the vitality of viability of the scheme, and ensure that the design approach creates new active frontages, which will help to encourage strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the varied needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses.
- v The scheme will utilise its proximity to the River Thames as a key asset and provide a new water sports centre to utilise this which will provide for informal waterside recreation and access. This will help to increase public access and optimise the use of land to ensure the scheme maximises the wider public benefits on balance.
- vi The scheme will retain the existing Maltings building and refurbish the building to bring it back into viable, active community use for the benefit of the general public.
- vii The scheme will deliver new, well designed architecture which will result in beneficial improvements to river front views, as a result of the introduction of high-quality buildings of considerable scale. A number of sports facilities will be

provided including a full-size floodlit football pitch, indoor and outdoor MUGAs, an indoor activity hall and associated changing room facilities. The proposed enhancement and improvements to the existing and provision of new facilities and spaces will allow for year-round usage for the benefit of the new school and community. The use of these facilities will be subject to a Community Use Agreement, which will actively encourage and promote the multi-use of the premises and access for a range of user groups. This will enable and promote physical activity and encourage healthier lifestyles and habits for all ages.

- viii Job growth and new employment opportunities, during both the construction period and post-completion, supporting local regeneration and enabling access to a wide range of jobs, enhancing the skills of local people and driving growth to benefit the area and London.
- ix A significant CIL contribution to support and fund new infrastructure that the Council and local communities want, including significant contributions towards Mayoral CIL.
- x A programme of investment in highways improvement works are proposed. These works are required to facilitate the development of the new secondary school and/or the wider masterplan development.
- xi A bus contribution in-lieu will be made payable to TfL to help support improvements to a bus service for the benefit of the public.
- xii The development may contribute towards Controlled Parking Zones (“CPZ”) either to support the introduction or extension of parking or waiting controls in the area to alleviate any parking stress that the development may generate.
- xiii A contribution in-lieu towards upgrade works to the level crossing on Sheen Lane.
- xiv The proposals will create new public routes and cycle ways, both to and from a previously closed site. This will help to create new, healthy routes and improve the overall permeability of the Site both by foot and cycle and connect to local walking and cycling networks; as well as public transport.

- xv The proposals should help to create a healthy environment in which people choose to cycle, through securing provision of 2,884 new cycle parking spaces, which will be fit for purpose, secure and well-located across the development.
 - xvi A cash-in-lieu contribution towards the carbon offset fund to ensure that the development maximises energy efficiency and can help to cut pollution and keep energy consumption lower.
 - xvii Improvements to the city's green infrastructure to provide over 400 new trees and other vegetation, which will be incorporated into the public realm proposals for the development across the whole of the Site. This will help to provide several public benefits including: rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature, and improve overall levels of biodiversity.
 - xviii A total provision of 4.7 ha of open space across the whole to be of a better quality and more accessible to the public, which represents a 127% uplift (compared to 2.07 ha existing).
 - xix Creation of a new public route to the River Thames and new open spaces adjacent, together with improvement works to the existing towpath.
- 13.17 All of these elements would result in a substantial social economic and environmental benefits. These public benefits, in the context of paragraph 196 of the NPPF, far outweigh the identified harm caused.
- 13.18 In conclusion, it is considered that the Revised Scheme is acceptable in respect of impacts on heritage. The limited harm to the Mortlake Conservation Area has been justified in the context of the NPPF. It is therefore considered that the Revised Scheme complies with the relevant statutory tests, and national, strategic and local planning policy.

Townscape

Planning Policy

- 13.19 The policy position remains as per during the consideration of the Original Scheme. As previously set out within this Addendum Statement, national planning policy requires development proposals to be sympathetic to local site context and

surroundings. This is echoed in the London Plan and emerging London Plan in respect of policies surrounding density and optimising site capacity (as assessed within section 10 of this Addendum Statement). Specifically in respect of views, London Plan Policy 7.12 and emerging Policy HC3 both encourage Boroughs to use the principles of the London View Management Framework for the designation and management of local views.

- 13.20 At a local level, aside from the LBRuT Local Plan policies which require development proposals to consider their local context (Policies LP 1 and LP 2), Policy LP 5 focuses on the protection of views and vistas. Proposals should protect and enhance key views and seek improvement to views and the local skyline. Policies LP 12 and LP 16 require development to incorporate green infrastructure, appropriate landscape compatible with the surrounding landscape and character. Specifically in respect of the river, Policy LP 18 requires development adjacent to river corridors to contribute to the river environment.

Assessment

- 13.21 An updated Townscape and Visual Impact Assessment has been included within the Environmental Statement addendum. This assessment has re-considered the conclusions of the 2018 Environment Statement in the context of the Revised Scheme amendments, particularly the increase in building heights. Impacts have been considered on the townscape character as well as views and visual amenity.
- 13.22 In terms of impacts on townscape during the construction, the revised townscape assessment concludes that the effects are broadly in accordance with the conclusions of the 2018 Environment Statement apart from a increase in impact to viewpoint 3 (pedestrians and road users on Chiswick Bridge (south)) which would experience temporary moderate adverse effects, as opposed to minor adverse for the Original Scheme.
- 13.23 In terms of impacts from the completed development, Waterman conclude that impacts on townscape character from the Revised Scheme would remain in accordance with the Original Scheme. In terms of local views, the magnitude of effects has changed as a result of the Revised Scheme at viewpoints nos 4, 5, 6, 7 and 10. Receptors at these view points would experience permanent, local, beneficial residual effects of major significance. The residual effects at the remaining viewpoints are in

line with the Original Scheme. The overall permanent changes to the surrounding views are considered to be of beneficial significance.

- 13.24 It is therefore considered that the Revised Scheme complies with relevant planning policy in that the scheme has been developed giving due regard to impact on local townscape and views, and this has been assessed as being overall beneficial.

14 Energy and Sustainability

Planning Policy

- 14.1 Mitigating and adapting to climate change continues to be a key element of the environmental objective in ‘sustainable development’ as promoted by the NPPF (paragraph 8). The NPPF at paragraph 148 goes on to state that the planning system should support the transition to a low carbon future in a changing climate.
- 14.2 The Mayor’s vision in the London Plan is to ensure London becomes an exemplary, sustainable world city whilst allowing London to grow in a responsible and considered socio-economic manner. The energy and sustainability policies outlined at Chapter 5 of the adopted London Plan remain unchanged since the Original Submission. Similarly, LBRUT’s Local Plan Policies LP 20 and 22 remain unchanged.
- 14.3 Since the submission of the Original Scheme, the ITP London Plan has been published. The ITP London Plan represents a step-change in approach and serves as a blueprint for the future development and sustainable, inclusive growth of London. ITP London Plan draft Policy SI2 seeks major developments to be net zero-carbon, reducing greenhouse gas emissions in accordance with the (i) be lean; (ii) be clean; and (iii) be green energy hierarchy. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the energy hierarchy framework, with the draft Policy stipulating a requirement for a minimum on-site reduction of at least 35% beyond the baseline of part L of the 2013 Building Regulations, with any identified shortfall to be provided through a cash in lieu contribution to the Borough’s carbon offset fund (to fund and implement projects that deliver carbon reductions) or through an alternative, identified provision being made off-site.
- 14.4 ITP London Plan draft Policy SI3 sets out how energy infrastructure and effective energy supply (‘masterplan’) solutions can be delivered across London in different spatial contexts. The supporting text at paragraph 9.3.2A recognises the limitations and impacts arising from combined heat and power (“CHP”) systems and the increasing evidence of adverse air quality impacts. Therefore, the supporting text is clear at draft paragraph 9.3.3 of the ITP London Plan that **“developments should connect to existing heat networks, wherever feasible”**.

- 14.5 ITP London Plan draft Policy SI4 seeks to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure of new development proposals. Draft Policy SI4 states this could be demonstrated through an Energy Strategy in accordance with the cooling hierarchy.
- 14.6 ITP London Plan draft Policy SI7 seeks to conserve resources, reduce waste and increase in material re-use and recycling. This draft Policy is clear that referable applications should promote circular economy outcomes and aim to be net zero-waste.

Assessment

- 14.7 The Revised Scheme has not made any changes to the proposed energy strategy as per the Original Scheme. This would include heating and hot water to be provided by a site wide heat network fired by a gas fired CHP and high efficiency gas boilers. Photovoltaic panels would be provided on available roof areas. The school would be serviced by a CHP of its own. The Energy Strategy and Sustainability Strategy (both prepared by Hoare Lea) have been updated to reflect the changes to the scheme, including the increase in residential units and reduction to the basement area.
- 14.8 The revised Hoare Lea documents consider the Revised Scheme against relevant planning policy, including the current and emerging London Plan. In respect of the policies of the draft ITP London Plan, whilst the energy strategy has not been developed in line with the emerging policy, it is considered acceptable in this instance given the fact that the Revised Scheme is coming forward as substitutions to the Original Scheme, which was developed in accordance with Mayoral energy policy and guidance at that time.
- 14.9 Notwithstanding this approach, it is considered that the Revised Scheme complies with the direction of the ITP London Plan draft energy policies. It is the Applicant's intention that conditions would be attached to any planning permission for the Revised Scheme as set out in the submitted revised Energy Strategy. In summary, the conditions for Application A would require:
- i A scheme to be submitted for approval which demonstrates how connection can be made between the heat networks for Development Area 1 and Development Area 2, thereby creating a single site-wide heat network for Application A. The

Applicant shall use reasonable endeavours to ensure that the single site wide heat network will be delivered.

- ii A scheme to be submitted for approval containing a review of suitable low and zero carbon technologies that could be incorporated in Development Area 2 to provide a carbon dioxide emissions reduction at least commensurate with the submitted Energy Strategy. The review would be undertaken in line with energy policies in place at the time of submission of the Reserved Matters submission.
- iii In the event that Development Area 2 (applied for in outline) does not become operational within 5 years of the first occupation of Development Area 1 (applied for in detail), a low and zero carbon technology feasibility report shall be submitted for approval – the report shall review the options to replace the gas boilers in the Phase 1 energy centre with the connection to the site-wide heat network proposed in Application A, or, if this is not available, an alternative low and zero carbon technology to serve the Phase 1 energy centre. The Applicant shall use reasonable endeavours to prioritise connection to the site wide heat network, or to replace the gas boilers with the identified low carbon technology if shown to be feasible. A carbon dioxide emissions reduction at least commensurate with the Energy Strategy submitted for Application A should be demonstrated.

14.10 For Application B, a condition would require an energy strategy to be submitted prior to the commencement of development.

14.11 The Revised Scheme continues to propose a carbon offset payment.

14.12 In summary, it is considered that the Revised Scheme complies with national, strategic and local planning policy which seek to minimise carbon emissions and promote sustainable developments. Whilst the Revised Scheme has not been developed in conjunction with the ITP London Plan draft Policies, it is considered that the conditions agreed by the Applicant are in line with the direction of travel set out in the ITP London Plan in respect of energy.

15 Other Technical Considerations

15.1 This section assesses other technical considerations against relevant planning policies. The Revised Scheme continues to be acceptable in all of these technical elements, as demonstrated in this section and the relevant technical documents.

15.2 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

Ground Contamination

Planning Policy

15.3 The adopted London Plan at Policy 5.21 remains unchanged, as indeed does LBRuT's Local Plan Policy LP 10. ITP London Plan draft Policy SD1 is clear that new development must take appropriate measures to deal with contamination that may exist.

Assessment

15.4 A Ground Conditions and Contamination Assessment was prepared by Waterman IE as part of the original ES (Chapter 11). This was not required to be updated as a result of the May 2019 Substitutions. The Revised Scheme amendments do require a re-

consideration of the assessment, and this has been included within the submitted ES Addendum.

- 15.5 As outlined within the ES Addendum, the amendments to the scheme do not involve significant changes to proposed end-uses of buildings, foundation design or building footprint. At below-ground level, the basement floorspace west of Ship Lane has now been reduced; however, the depth that was previously assessed does not change (i.e. the proposed western basement slab is still set at 2.45m AOD). In terms of the basement to the east of Ship Lane, the scheme amendments mean this has now been expanded slightly with a small sub-basement level now included in the south-western corner of this area (under Block 1) extending down to -1.64m AOD.
- 15.6 As outlined within the ES Addendum, the Revised Scheme amendments do not result in any changes to the ground conditions and contamination effects identified in the 2018 Environment Statement (as amended), which therefore remains valid.
- 15.7 It is therefore concluded that the amendments to the proposed development will protect receptors from contamination risks, in accordance with planning policy.

Services and Utilities

Planning Policy

- 15.8 Adopted London Plan Policy 5.14 and LBRuT's Local Plan Policy LP 23 remain unchanged. ITP London Plan draft Policy SI5 at Part I is clear that development proposals should seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided and to minimise the potential for misconnections between foul and surface water networks.

Assessment

- 15.9 A Foul Sewage and Utilities Assessment was submitted as part of the Original Scheme, which was prepared by Hoare Lea. This Assessment has now been updated and is submitted as part of the Revised Scheme substitutions. This document sets out the existing services and utilities infrastructure, and how the proposed development will be served. An updated Drainage Strategy has also been prepared by Waterman which includes details on the proposed foul drainage methods. It is proposed to create

new connections into existing sewers. Discussions with Thames Water have confirmed that the existing public sewer network has the capacity to accommodate the proposed foul flows.

- 15.10 As outlined above, careful consideration has been made for appropriate connections to existing services and utilities infrastructure. It is therefore considered that the Revised Scheme is in accordance with relevant planning policy in respect of services and utilities.

Flooding and Drainage

Planning Policy

- 15.11 Chapter 14 of the NPPF sets out the sequential approach to planning new development and flood risk. The adopted London Plan Policy 5.12 and LBRuT's Local Plan Policy LP 21 remain unchanged since the original submission.
- 15.12 ITP London Plan draft Policy SI12 at Part I is clear that proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Part (F) states that development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading.
- 15.13 TP London Plan draft Policy SI13 states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible, with a preference for green over grey features, in line with the well-established drainage hierarchy set out in Part B of this Policy. Part (D) is clear that drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improve water quality, and enhance biodiversity, urban greening, amenity and recreation.

Assessment

- 15.14 The Revised Scheme substitution pack includes an updated Surface Water Drainage and Flood Risk assessment (which formed chapter 12 of the original ES). This is also supported by an updated Flood Risk Assessment ("FRA"), prepared by Hydro-Logic Services and an updated Drainage Strategy, prepared by Waterman. The FRA

assesses flood risk impacts associated with the sites the subject of Applications A and B. These conclude that the proposed changes would be insignificant.

- 15.15 The latest amendments to the scheme have provided further detail in respect of access to the river wall and drainage, follow earlier comments raised through dialogue with both the GLA and Environment Agency (“EA”).
- 15.16 The updated FRA demonstrates that the proposed development satisfies the NPPF Sequential and Exception tests., and that the proposed mitigation will 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.
- 15.17 As outlined within the ES Addendum, these changes do not give rise to any new likely significant surface water drainage or flood risk effects compared to those identified in the 2018 ES (as amended). As such, no additional mitigation measures are required in addition to those proposed and as already with the EA, Port of London Authority, LBRuT and the GLA.
- 15.18 The proposed development is therefore considered to satisfy the relevant requirements of the NPPF, London Plan and LBRuT’s flooding and drainage policies.

Noise and Vibration

Planning Policy Assessment

- 15.19 Paragraph 180 of the NPPF is clear that planning decisions should ensure that new development take the likely noise effects (including cumulative effects) resulting from new development into account, to ensure it mitigates and reduces any potential adverse impacts to a minimum – and to avoid noise giving rise to significant adverse impacts on health and life quality.
- 15.20 Policy 7.15 of the London Plan, as well as LBRUT Local Plan Policies LP8 and LP10 all remain unchanged, in respect of broadly seeking to reduce, manage and mitigate noise and enhance soundscapes.
- 15.21 ITP London Plan draft Policy D13 sets out the Agent of Change principle, which places the responsibility for mitigating the impact of noise and other nuisances on new

development. Draft Policy D14 is also clear that development proposals should manage and mitigate noise to improve health and quality of life; improve and enhance the acoustic environment and promote appropriate soundscapes; separate new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials.

Assessment

- 15.22 Hoare Lea have provided an updated Noise Impact Assessment, which considers the impact of noise from the scheme on the new residents. The Revised Scheme does not propose any amendments to the noise strategy. As agreed with Sport England and LBRuT's Environmental Health Officer ("EHO") during discussions on the Original Scheme, the proposals include installation of acoustic barriers and a mesh fence to reduce the noise impact of the sports facilities on nearby residents. A Covenant of Use for new residents, which would be built in to lease restrictions to prospective tenants of the new neighbouring residential properties immediately fronting on to the sports pitches has also been agreed.
- 15.23 Waterman have also re-considered the noise impacts from the Revised Scheme on existing residential receptors as part of the ES Addendum. The principle changes in respect of noise for existing residential receptors is the amendment to the proposed highways works, and the change to traffic flows as a result of the Revised Scheme. As set out within this Addendum Statement, four alternative options for highways works have been considered by the Applicant team which Waterman have considered all in respect of noise.
- 15.24 The updated Waterman assessment concludes that the results of the updated baseline noise survey and assessments have found that there have been only minor changes to the overall noise climate in the area and, therefore, the assessments undertaken as part of the 2018 Environment Statement (as amended) therefore still remain valid.
- 15.25 As outlined within the ES Addendum, the revised noise assessment takes account of noise emissions from both the school sports playing field and the MUGA, taking account of inherent and enhanced mitigation measures and the guidance from Sport England. This approach has all already been subject of extensive discussions and agreed prior with LBRuT Environmental Health and Sport England. As stated within

the ES Addendum, these updated results show that the residual effects are insignificant in noise terms.

- 15.26 Taking this all into account, the proposals do not affect the conclusions of the ES and/or the officer's assessment in the LBRuT Committee dated January 2020.
- 15.27 The Revised Scheme is considered to comply with LBRuT Local Plan Policy LP 8 as the identified mitigation and conditions that will be secured through the grant of planning permission will ensure that the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties can be protected. To that effect, the proposals further comply with the objectives of LBRuT Local Plan Policy LP 10 as they will manage any local environmental impacts to ensure the proposals do not lead to detrimental effects on the health, safety and amenity of existing and new users or occupiers in terms of noise and vibration.

Air Quality

Planning Policy

- 15.28 The NPPF at paragraph 170 is clear that development should, wherever possible, help to improve local environmental conditions such as air and water quality. paragraph 180 of the NPPF states that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.
- 15.29 The NPPF at paragraph 181 seeks to sustain and contribute towards complying with relevant limit values or national objectives for pollutants, considering the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Paragraph 181 further states that planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- 15.30 The adopted London Plan at Policy 7.14, and LBRuT Policy LP 8 and LP 10, all remain unchanged.

15.31 ITP London Plan draft Policy SI1 aims to ensure that new developments are designed and built as far as is possible to improve local air quality and reduce the extent to which the public are exposed to poor air quality. In order to tackle poor air quality, protect health and meet legal obligations development proposals should not:

- a. Lead to further deterioration of existing poor air quality;
- b. Create any new areas that exceed air quality limits or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;
- c. Create unacceptable risk of high levels of exposure to poor air quality.

Assessment

15.32 Waterman have prepared a revised Air Quality Impact Assessment to consider the air quality impacts of the Revised Scheme. This assessment is included within the submitted ES Addendum.

15.33 The principal changes affecting the air quality assessment include the amendment to the highways works, and the change in traffic flows which are driven partly as a result of the reduced car parking, and partly from the reduced trips from the school. The Revised Scheme continues to provide a wide range of air quality improvement measures including:

- i The provision of 2,884 cycle parking spaces, cycle routes and new pedestrian routes, all of which will encourage more sustainable modes of travel;
- ii A commitment to provide 20% of car parking spaces to be provided with active electric charging provision, and 100% provided with passive electric charging provision;
- iii A commitment to a Construction Environment Management Plan, Framework Construction Management Plan and Construction Traffic Management Plan;
- iv The provision of a significant amount of new green space and trees.

15.34 As noted above, Waterman have considered the four alternative highways options and considered the air quality impacts. The results of this are summarised as follows:

- i Option 1 (Do Nothing) – Whilst this option would include a financial contribution to help mitigate the transport impacts of the scheme, as this contribution has not been quantified in terms of physical works, the assessment for air quality has considered this option as a ‘do nothing’ scenario whereby the revised traffic flows are modelled on the highway network with no highways works proposed.
- ii Option 2 (Chalkers Corner ‘Light’) – This option would involve provision of a new left-hand land westbound on Lower Richmond Road onto the A316, resulting in three lanes on Lower Richmond Road, to help mitigate the transport impacts of the scheme. The results show that the impact in air quality terms would be ‘negligible’
- iii Option 3 (Lower Richmond Road Bus Lane) – This Option would be the same as Option 1, but with a dedicated bus lane westbound on Lower Richmond Road to help mitigate the transport impacts of the scheme. The results show that the impact in air quality terms would be ‘negligible’.
- iv Option 4 (Chalkers Corner ‘Light’ & Bus Lane) – This Option would be the same as Option 2, but with a dedicated bus lane westbound on Lower Richmond Road to help mitigate the transport impacts of the scheme. The results show that the impact in air quality terms would be ‘negligible’.

15.35 Waterman have also considered the works proposed to Chalkers Corner / Chertsey Court as proposed under Application C in the context of the Revised Scheme and the amendments proposed under Applications A and B. worked closely with the transport engineers (Stantec) to consider the most suitable option.

15.36 As outlined within the ES Addendum, an updated assessment of the air quality impacts has been undertaken by Watermans. This assessment uses updated modelling to assess potentially sensitive receptors and provides an updated assessment of air quality emissions in respect of pollutants including both Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀) as required under adopted policy. In doing so, the updated Air Quality Assessment assesses the air quality impacts at different stages in the Development including demolition and construction phase; inherent (i.e. measures included in the design of the Development) and additional future measures that could be included and/or are to be secured through a S278 Agreement of the Highways Act 1980 in due course.

- 15.37 The ES Addendum and associated Appendices clearly set out a summary of the proposed mitigation measures which can be secured via condition or S106 Agreement. The supporting documentation is clear that the main likely effects on local air quality during the Works would relate to dust. However, a range of measures to minimise or prevent dust would be implemented through a Construction Environment Management Plan (“CEMP”) to be secured via condition, so that dust can be suppressed and that no significant dust effects would result during the demolition and construction phase.
- 15.38 In terms of design, a number of mitigation measures have been included such as: a material reduction in the car parking provision from 1 space down to 0.33 spaces per residential unit; a low NOx Energy centre; provision for up to 2,884 cycle parking spaces; one fifth (20%) of all parking provision to be for Electric Vehicles as well have already been agreed either through conditions, and a number of plans including Delivery and Servicing Plans, and Framework, School and Residential Travel Plans to encourage sustainable modes of transport in line with adopted planning policy.
- 15.39 As noted in the Technical Note (ES Addendum Appendix I – 10.4) supporting this submission, Watermans consider that the effect of the junction reconfiguration and all four Options (1 to 4) in terms of the impact any development traffic on pollutant concentrations are considered to have a ‘negligible’ impact and therefore to be not significant. Option 5 (i.e. Application C in the context of the Revised Scheme), is also considered to result in a ‘negligible’ impact at all receptor locations.
- 15.40 Taking this all into account, the proposals do not affect the conclusions of the Environment Statement (as amended) submitted for the Original Scheme.
- 15.41 The mitigation measures identified within the supporting material provided by Waterman and as summarised above are all considered to minimise any increased exposure to poorer air quality through the promotion of sustainable design and construction measures. This will help to ensure that air quality emissions and impacts from demolition, construction and once operational are minimised and do not lead to a further deterioration in air quality terms. As agreed between discussions with LBRuT and the GLA, these mitigation measures will be secured via condition and S106 Agreement. It is considered the proposals would therefore not to 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. On this basis, the Revised Scheme is therefore considered to comply with London Plan Policy 7.14, ITP London Plan draft Policy SI1 and LBRuT Local Plan Policy LP10.

Biodiversity and Ecology

Planning Policy

- 15.42 The NPPF at paragraph 175 is clear that proposals should support conservation and enhancement of biodiversity; whilst encouraging opportunities to incorporate biodiversity improvements in and around developments, where this can secure measurable net gains for biodiversity.
- 15.43 Adopted London Plan Policy 7.19 and LBRuT's Local Plan Policy LP 15 have not changed.
- 15.44 ITP London Plan draft Policy G6 at Part (D) stipulates that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. The draft Policy is clear this should be informed by the best available ecological information and addressed from the start of the development process.

Assessment

- 15.45 The ES Addendum assesses the impact of the development on terrestrial ecology and nature conservation features. The ES Addendum is clear that the assessment of effects previously reported within Chapter 13: Ecology Chapter of the 2018 ES (as amended) remains valid. The conclusions further state that, whilst the works may have some direct and indirect effects on roosting bats, this can be mitigated through submission and approval of a Bat Low Impact Class Licence from Natural England and implementation of a Construction Environment Management Plan. In terms of the completed development, the ES Addendum is clear there will be no effect as there is proposed provision of bat boxes to be incorporated within the Development.
- 15.46 The Revised Scheme will therefore protect and enhance ecology and biodiversity in line with policy requirements.

Daylight/Sunlight

Planning Policy

- 15.47 Policies 7.6 and 7.7 of the adopted London Plan, and LBRuT's Local Plan Policy LP 2, have not changed.
- 15.48 ITP London Plan draft Policy D9 is clear that development proposals for tall buildings in London should address any impacts relating to daylight and sunlight around the building and that the neighbourhood must be carefully considered.

Assessment

- 15.49 The ES Addendum includes an updated assessment of the likely significant effects of the proposed development on daylight, sunlight, overshadowing and light pollution at sensitive receptors surrounding the Site.
- 15.50 As outlined in the ES Addendum, there are minor changes to the residual effects and the conclusions of the 2018 ES (as amended). Squire & Partners have worked closely with the daylight / sunlight consultants eb7 for the additional height to be mitigated in daylight / sunlight terms through considered design. eb7 have also worked closely with Gillespies to maximise the amenity spaces receiving adequate sunlight.
- 15.51 Boat Race House continues to see a moderate to major adverse effect in terms of daylight. It should be noted that this effect is the same as reported to LBRuT's Planning Committee in January 2020 under the Original Scheme (the effects were reported in the May 2019 ES Addendum and not the 2018 Environment Statement as originally the Boat House residential permission had not been implemented). The ES Addendum for the Revised Scheme also reports minor adverse effects for Aynescombe Cottage.
- 15.52 In terms of the residual effects for overshadowing to surrounding amenity areas and light pollution, there are no changes. These both remain as insignificant.
- 15.53 eb7 has also provided an Addendum Internal Daylight and Sunlight Assessment, to assess 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 updated assessment shows that circa 86% of all rooms would meet or

exceed BRE targets well in excess of all the levels. Where levels are below, this is due primarily to overhanging balconies and wider Site constraints. With respect to the sunlight assessment, the results show circa 62% achieve compliance with BRE criteria and there are some instances where direct sunlight to the window face will be limited. However, eb7 note that this is usual for a scheme of this type where the orientation of the Site dictates east-west units. For the overhanging assessment, 55% of amenity spaces assessed would achieve direct sunlight levels in line with BRE criteria.

- 15.54 Therefore, the impact of the Revised Scheme on daylight/sunlight and overshadowing has been fully assessed. Most effects on existing local receptors are deemed to be insignificant. Regarding 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.

Lighting

Planning Policy

- 15.55 There are no planning policy changes of relevance specifically in respect of lighting aside from the formal adoption of the LBRuT Local Plan (and specifically Policy LP 9, which was considered in the February 2018 Town Planning Statement). ITP London Plan draft Policy S5 (part C) echoes adopted London Plan Policy 3.19 in 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.

Assessment

- 15.56 There are no changes proposed to the Sports Pitch Lighting Assessment and Lighting Masterplan, prepared by Michael Grubb Studio. Hours of the use of the sports facilities and external floodlights are all as per agreed with LBRuT and Sport England during consideration of the Original Scheme.
- 15.57 In terms of environmental effects arising as a result of proposed lighting, the ES Addendum is clear that the latest amendments to the scheme does not result in any

residual effects as already stated in the 2018 ES (as amended) and this remains insignificant.

- 15.58 It is therefore considered that the Revised Scheme continues to comply with relevant planning policy in this regard.

Wind Microclimate

Planning Policy

- 15.59 Policies 7.6 and 7.7 of the adopted London Plan, and LBRuT's Local Plan Policy LP 2, are unchanged.
- 15.60 ITP London Plan draft Policy D8 states that development proposals should ensure buildings are designed to activate and define the public realm and provide natural surveillance.

Assessment

- 15.61 An update to the ES Chapter 17 (as amended) has been undertaken by RWDI as part of the ES Addendum. RWDI has carried out further wind tunnel testing to fully assess the impact of the changes to height, building reconfigurations and landscaping proposals upon the pedestrian wind microclimate.
- 15.62 The updated Wind Microclimate Assessment and ES Addendum demonstrates that the proposed amendments were generally as for the 2018 ES (as amended), and that with the landscaping in situ, that wind conditions would be suitable for the intended use throughout the detailed component of the Revised Scheme.
- 15.63 The ES Addendum stipulates that for the outline components of the Revised Scheme, wind conditions may require mitigation during the detailed design stage to consider potential seating areas at roof level. However, this assessment would be provided in support of any forthcoming Reserved Matters application.

16 Conclusions

- 16.1 This Addendum Statement has been prepared to describe and assess the amendments proposed, in the context of the adopted Development Plan and emerging policy, including the ITP London Plan.
- 16.2 The Revised Scheme would deliver an improved development which responds to the strategic objectives of the Mayor’s adopted and emerging policy, as well as realising LBRuT’s ambitions for the Site as set out in LBRuT Local Plan Policy SA 24. The Revised Scheme will deliver compelling public benefits, including significant delivery of housing (including affordable housing), along with new jobs, new open and green spaces for existing and future communities, new active uses to deliver a new ‘heart’ for Mortlake, as well as a new secondary school.
- 16.3 The principles of the development remain as per the Original Scheme and as considered by LBRuT’s Planning Committee in January 2020. The amendments now proposed have been prepared to respond directly to issues raised by the Mayor in his Stage 2 report in respect of housing (including affordable housing), and transport. No changes are proposed to the physical works proposed under Application C (Chalkers Corner). Whilst the works proposed in Application C are still an available option and remain ‘live’ within the development proposals, the Applicant has progressed alternative approaches for addressing and mitigating the impacts on surrounding highways, and these have been tested within the relevant substitution documents for Applications A and B. All of these options are subject to ongoing discussions and testing with the GLA and TfL. They are all within the existing highway boundaries and if agreed would not, in themselves, require planning consent.
- 16.4 With respect to Section 38(6) of the Planning and Compulsory Purchase Act (2004), it is concluded that the Revised Scheme is in accordance with the development plan as a whole and where that is not the case in relation to individual policies, that is outweighed by other material considerations. The Revised Scheme would deliver substantial benefits which include:
- i Up to 1,250 new homes, with up to 30% provided as on-site affordable housing, which will make a significant contribution to the delivery of housing in London;

- ii Significant place-making and architectural benefits including the creation of a new active high street and river front uses, opening up of the Site through creation of new publicly accessible open and green spaces, and high-quality architecture which includes incorporation of the existing historic buildings;
 - iii Economic benefits arising from the provision of a range of new commercial uses including new commercial Class B1 office floorspace, which would include an element of affordable workspace, benefits arising from employee spend and local construction jobs;
 - iv Provision of a new six form entry secondary school, in line with the identified aspirations in the LBRuT Local Plan;
 - v Creation of new community spaces, including a new water sports centre and community space, alongside new public squares and plazas to encourage community engagement;
 - vi Creation of new pedestrian and cycle routes through the Site to add to existing local connections, including enhancing the existing towpath and creating a new expansive link from Mortlake Green through to the river;
 - vii Transport improvements including highways works, contributions to bus facilities and the level crossing area and significant provision of cycle parking facilities and good pedestrian routes to encourage sustainable modes of travel; and
 - viii Significant CIL contribution which will facilitate improvements to local infrastructure and the Mayor's strategic transport infrastructure.
- 16.5 For the reasons outlined, it is considered that planning permission should accordingly be granted.

Appendix A – Summary of Post Call-In Changes

	Original Scheme (i.e. February 2018 Submission, May 2019 Substitution and subsequent amendments), as taken to LBRuT Planning Committee 29 January 2020	Revised Scheme (i.e. current substitution submission)
1	<i>Land Uses</i>	
a	Up to 813 residential units including either 150 flexible assisted living or residential accommodation units) (of which up to 525 private and up to 138 affordable)	Up to 1,250 residential units (of which up to 894 private and up to 356 affordable)
b	4,686 sqm flexible use floorspace for use as Class A1, A2, A3, A4, B1, D1, D2 and sui generis	5,023 sqm flexible use floorspace for use as Class A1, A2, A3, A4, B1, D1, D2 and sui generis Location of flexible use changed (remains within Development Area 1 to the east side of Ship Lane)
c	2,417 sqm office (Class B1) floorspace (in addition to space within flexible use floorspace) – 10% of all office space to be affordable workspace	5,532 sqm office (Class B1) floorspace (in addition to space within flexible use floorspace) – 10% of all office space to be affordable workspace
d	Hotel / public house with accommodation (1,673 sqm)	Hotel / public house with accommodation (1,765 sqm)
e	Cinema (2,120 sqm)	Cinema (1,606 sqm)
f	Gym (740 sqm)	Gym use removed from scheme
g	Up to 150 units of flexible use living accommodation for either assisted living or residential use (flexible Class C2 and/or Class C3)	Assisted living element removed from scheme
h	Nursing and care home (up to 80 en-suite rooms) with associated communal and staff facilities	Nursing and care home removed from scheme
i	School (9,319 sqm) (1,200 students and 60 FTE staff)	School retained as part of enlarged scheme. No changes proposed.

2	<i>Design and landscaping</i>	
a	Building heights ¹⁶¹⁷ comprising:	Building heights increased, comprising:
	Block 1 – 4 storeys (22m AOD)	Block 1 – approximately 5 storeys when compared to residential blocks, actually 4 large stories (25.78m AOD)
	Block 2 – 7-8 storeys (35.93m AOD)	Block 2 – 8-10 storeys (44.63m AOD)
	Block 3 – 6 storeys (28.03m AOD)	Block 3 – 7 storeys (30.93 AOD)
	Block 4 – 8 storeys (32.85m AOD – as existing)	Block 4 – 8 storeys (32.85m AOD – as existing). No change.
	Block 5 – 3 storeys (18.47m AOD)	Block 5 – 3-4 storeys (20.80m AOD)
	Block 6 – 4 storeys (21.68m AOD)	Block 6 – 5 storeys (24.98m AOD)
	Block 7 – 7-8 storeys (35.93m AOD)	Block 7 – 9-10 storeys (44.63m AOD)
	Block 8 – 6-8 storeys (35.93m AOD)	Block 8 – 9 storeys (37.93m AOD)
	Block 9 – 4-5 storeys (24.98m AOD)	Block 9 – 5 storeys (24.98m AOD). No change.
	Block 10 – 4-5 storeys (24.98m AOD)	Block 10 – 5-6 storeys (28.28m AOD)
	Block 11 – 7 storeys (31.33m AOD)	Block 11 – 9 storeys (37.93m AOD)
	Block 12 – 6-7 storeys (31.33m AOD)	Block 12 – 7-8 storeys (34.63m AOD)
	Block 13 – 4-6 storeys (up to 29m AOD)	Block 13 – 4-6 storeys (up to 29m AOD). No change.
	Block 14 – 4-5 storeys (up to 25m AOD)	Block 14 – 4-6 storeys (up to 29m AOD)
	Block 15 – 5-6 storeys (up to 29m AOD)	Block 15 – 8 storeys (up to 37m AOD)

¹⁶ Note that the heights quoted for the detailed Buildings (Block 1 – 12) differ slightly from those figures presented in the LBRuT Planning Committee Report for meeting on 29 January 2020; this is due to (a) rounding; (b) turret elements being lowered before Committee which have not been reflected in the heights presented (Blocks 2, 7 and 8)

¹⁷ The heights quoted for the outline Buildings (Block 13 – 22) are as per the current and revised plans – the heights have been taken here as height from sea level rather than from ground level, as shown on the submitted parameter plans

Block 16 – 5-6 storeys (up to 29m AOD)	Block 16 – 6-8 storeys (up to 37 AOD)
Block 17 – 5-7 storeys (up to 32m AOD)	Block 17 – 6-8 storeys (up to 37m AOD)
Block 18 ¹⁸ – 4-6 storeys (up to 29m AOD), with the west elevation (fronting Williams Lane) to be no more than 21m AOD with any additional height to be no less than 2m from the elevation, unless otherwise agreed with the LPA ¹⁹	Block 18 – 3-7 storeys (up to 33m AOD)
Block 19 – 4 storeys (up to 22m AOD), with the north west flank (fronting Williams Lane) to be no more than 21m AOD with any additional height to be no less than 2.5m from the elevation, unless otherwise agreed with the LPA ²⁰	Block 19 – 4 storeys (up to 23m AOD)
Block 20 – 3 storeys (up to 19m AOD), with the north elevation (facing Thames Bank) to be no more than 16.7m AOD with any additional height to be agreed with the LPA ²¹	Block 20 – 4 storeys (up to 23m AOD)
Block 21 – 3 storeys (up to 19m AOD), with the north elevation (facing Thames Bank) to be no more than 16.7m AOD with any additional height to be agreed with the LPA ²²	Block 21 – 4 storeys (up to 23m AOD)
No Block 22 in Original Scheme	Block 22 – 4 storeys (up to 21m AOD)

¹⁸ For Blocks 18, 19, 20 and 21, the elevational heights quoted are as per draft condition NS88 (part C) as set out in the LBRuT Planning Committee Report (January 2019) and associated addendum. The figures quoted in the condition do not match what is set out above as the condition figures are taken from a base from ground level, rather than from sea level. The actual height of the buildings quoted above is consistent with the draft condition.

¹⁹ Heights as above to be controlled via Design Code and draft condition (note that figures quoted above are measured from sea level, not ground level)

²⁰ As above

²¹ As above

²² As above

b	Façade and elevational treatments	Façade and elevational amendments in connection with the amendments to heights as set out above
c	Blocks 18 and 19 – laid out with two gaps between blocks (to north west and north east of Block 18)	Blocks 18 and 19 – layout amended so two gaps are now north east (as existing) and south
d	Blocks 20 and 21 provided as two three storey townhouse terraces, providing 16 and 8 units respectively (24 private units in total)	Block 20 split into two blocks providing accommodation in 4 storey buildings Block 21 remains as three storey townhouses, but providing 7 residential units rather than 8 in the Original Scheme
e	Block 1 (Cinema)	Block 1 (Cinema) – materials and façade design amended to incorporate the office space above the cinema. Basement level added.
f	Minor footprint changes	Minor footprint changes to blocks 2, 3, 7, 8, 11 and 12 as a consequence of aesthetic refinements
g	Internal layouts	Layout changes to residential provision to accommodate change in residential mix and provision; minor amendment to ground floor layout of Block 4; the community space intended for the ground floor of Block 4 has moved to Block 5
h	Landscaping	Layout changes around Block 20 and Block 21 to suit the new residential typology with additional amenity and public open space Minor changes to suit revised location for building entrances were necessary Revised external finishes and ramp layout around Block 5
i	Trees	Additional no. 3 trees are proposed at the building frontage of Block 20 and Block 21, pruning works required to 4 existing trees in north west corner of the Site
j	7,149 sqm playspace (with school); 4,084 sqm playspace (without school)	10,667 sqm playspace (with school); 7,408 sqm playspace (without school)
3	<i>Transport, including Chalkers Corner</i>	

a	Basement on east side of Ship Lane comprising 408 car parking spaces (331 residential, 77 commercial) plant and cycle parking	Since the original application the east basement has reduced very slightly as B10 no longer requires residential access to the basement. This does not change the number of car parking spaces, albeit there are now 330 residential and 78 commercial (total remains at 408)
b	Basement on west side of Ship Lane comprising 256 car parking spaces, plant and cycle parking	Basement extent reduced to provide 70 car parking spaces alongside plant, and cycle parking (reduction in 186 spaces overall)
c	Provision of 15 car parking spaces at grade for the school	No change
d	20% of car parking spaces to be provided with active electric charging provision, and 100% provided with passive electric charging provision	No change to this approach
e	Provision of 1,754 long stay and 197 short stay cycle parking spaces across the Site	Provision of 2,582 long stay and 302 short stay cycle parking spaces across the Site
f	Highways mitigation at Chalkers Corner comprising reconfiguration of junction and works to existing landscaped area at Chertsey Court	In addition to the submitted scheme alternative options being explored to Chalkers Corner and elsewhere in order to mitigate highways impacts
g	School access roads and pedestrian routes	Minor amendments to school access roads and pedestrian routes

Appendix B – Revised Descriptions of Development

Application A

The following amendments are proposed to the description of development:

“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 10 storeys plus a basement of one and two storeys below ground

c) residential apartments

d) Flexible use floorspace for:

i. Retail, financial and professional services, 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) Offices

h) New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works

i) Provision of on-site cycle, vehicle and service parking at surface and basement level

j) Provision of public open space, amenity and play space and landscaping

k) Flood defence and towpath works

l) Installation of plant and energy centres

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 8 storeys

b) Residential development

c) Provision of on-site cycle, vehicle and service parking

d) Provision of public open space, amenity and play space and landscaping

e) New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works”

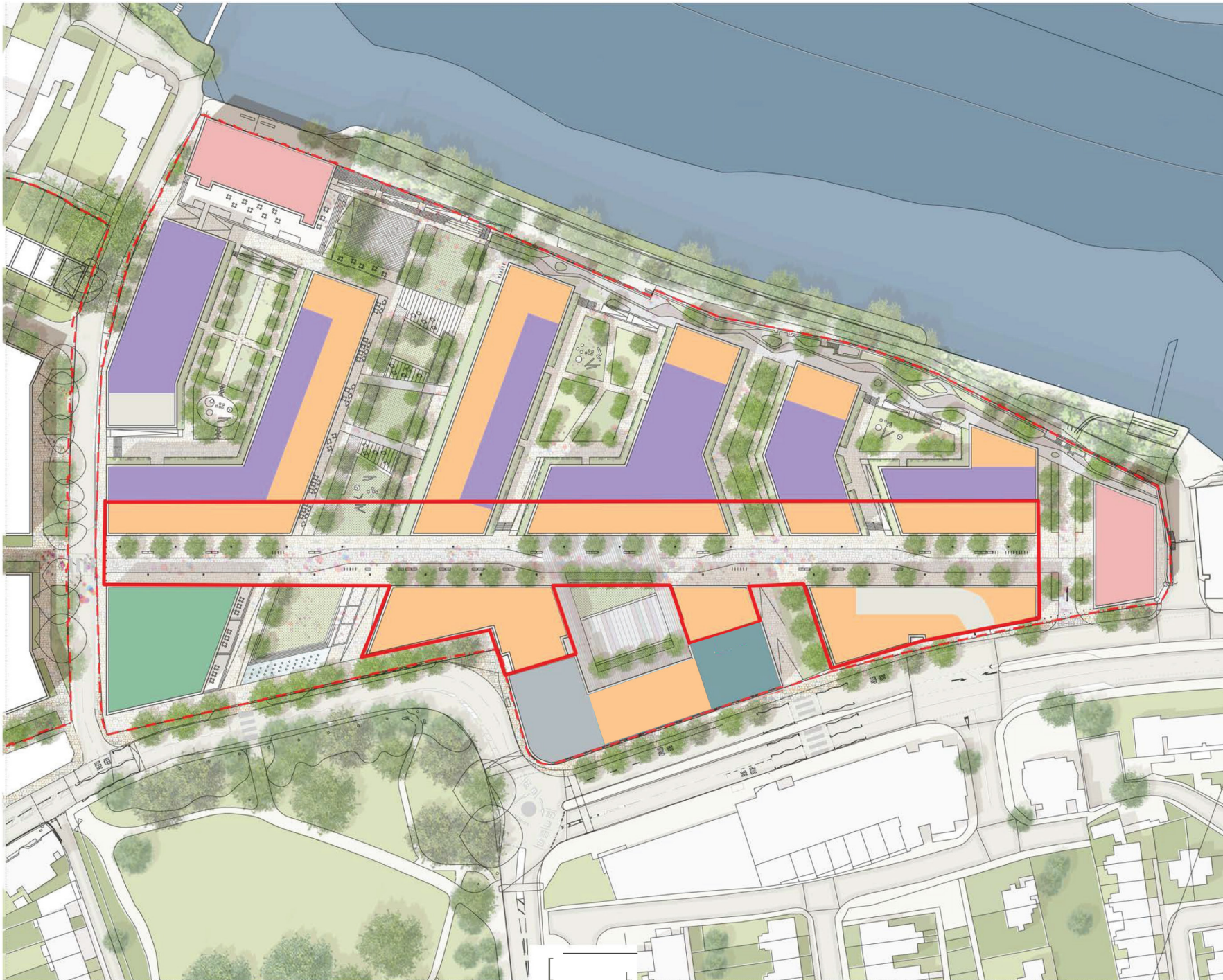
Application B

No amendments are proposed to the description of development for Application B.

Application C

No amendments are proposed to the description of development for Application C.

Appendix C – Revised High Street Zone Plan



NOTES:
 DO NOT SCALE FROM THIS DRAWING.
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High Street Zone
 Uses diagram revised 29.05.20 A
 Revision description: Check Rev

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Project
The Stag Brewery
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Drawing
Alternative Phase 1 masterplan

Drawn	Date	Scale
KH	25/05/2017	1:5000(A1)
Job number	Drawing number	Revision
16019 G100_P1_P_TY_001	A	