



GERALDEVE



Stag Brewery, Mortlake

Town Planning Statement

For Reselton Properties

March 2022



GERALDEVE

Town Planning Statement
The Former Stag Brewery, Mortlake

On behalf of: Reselton Properties Limited

March 2022

NTH/AKG/CST/STHO/J7699

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Contents

Page

Appendices

1	Executive Summary	3
2	Introduction	6
3	Masterplan Application Components and Structure	11
4	The Development Proposals	16
5	Site and Surroundings	25
6	Recent Planning History	30
7	Consultation and Community Engagement	33
8	Planning Policy Framework and Legislation	37
9	Planning Considerations - Principle of Redevelopment	42
10	Proposed Land Uses	51
11	Jobs and Employment	71
12	Residential Design	74
13	Design and Layout	93
14	Public Realm, Landscaping and Design of Open Spaces	119
15	Transport, Parking, Construction and Servicing	135
16	Heritage and Townscape	151
17	Energy and Sustainability	165
18	Other Technical Considerations	171
19	Planning Obligations and Infrastructure Requirements	185
20	Conclusions	188

A	Development Areas 1 and 2 boundaries, Site Application boundaries, High Street zone, Proposed Masterplan ground floor level, High Street Zone and Indicative Plot Plans
B	Decision Notices, dated 17 August 2021.
C	Planning History
D	Scheme Comparison: Facts and Figures
E	Meeting Schedule

1 Executive Summary

- 1.1 This Town Planning Statement (“the Statement”) has been prepared by Gerald Eve LLP on behalf of Reselton Properties Limited (“the Applicant”) in support of two 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 Applications are submitted now following the Mayor of London’s (the Mayor) refusal of two previous applications (refs: 18/0547/FUL (Application A) and 18/0548/FUL (Application B)) for the Site’s redevelopment on 17 August 2021:
- i. Refused Application A (ref: 18/0547/FUL) sought planning permission for: the residential-led masterplan redevelopment of the Site.
 - ii. Refused Application B (ref: 18/0548/FUL) sought planning permission for: the development of a secondary school for 1,200 pupils
- (together the “Original Applications”)
- 1.3 In summary, the Mayor’s reasons for refusal in respect of Application A were:
- i. height, bulk and mass;
 - ii. heritage impacts;
 - iii. neighbouring amenity issues and
 - iv. no section 106 agreement in place.
- 1.4 Application B was refused because it is intrinsically linked with Application A and could therefore not be bought forward without it.
- 1.5 The principles of the now Proposed Development remain as per the original Applications. A series of amendments (when compared to the Original Applications) are proposed, which include:
- i. A revised energy strategy to address London Plan (2021) requirements;

- ii. Several residential blocks have been reduced in height to better respond to the listed buildings along the Thames riverfront to the north of the Site and to respect the setting of the Maltings building, identified as a Building of Townscape Merit (BTM) by the LBRuT;
 - iii. The layout of the buildings to the south of Thamesbank (now Buildings 20 and 21) has been reconfigured to provide lower rise and setback buildings to better respond to the listed buildings along the Thames riverfront; and
 - iv. Alternative highways mitigation works are now proposed to be secured via a s278 highways agreement. The proposed Chalkers Corner highway mitigation works include the provision of a left turn flare lane from Lower Richmond Road within adopted highway land. Full details are included within the Transport Assessment and are shown on proposed drawing ref: 38262/5520/01, prepared by Stantec.
- 1.6 A full table of comparisons between the Original Applications and the now Proposed Development is included at Appendix D of this Statement. The amendments now proposed directly respond to issues raised by both the LBRuT and the Greater London Authority (GLA) during the determination of the Original Applications.
- 1.7 The Proposed Development will deliver a wide ranging and significant package of public benefits to the new and existing residential communities in the local area. This package includes the:
- i. Delivery of up to 1,085 new residential units (including affordable housing);
 - ii. Provision of a new six form entry secondary school with new sports facilities which will be available for community use outside of school hours;
 - iii. New community space, including a new boathouse;
 - iv. New office and flexible use commercial space including retail and restaurants;
 - v. Provision of significant areas of new public open space, including green space;
 - vi. Creation of new cycle and pedestrian routes through the Site, including provision of a large public 'Green Link' from Mortlake Green to the river;
 - vii. High quality, well designed new architecture and townscape;

- viii. Incorporation of sustainable and low-carbon technologies and biodiversity measures; and
 - ix. Improvements to the local highway network and provision of cycle parking facilities.
- 1.8 The original vision for the Applications was to deliver a ‘new heart for Mortlake’, in line with the aspirations set out in the LBRuT Stag Brewery Planning Brief (2011) (SBPB). The SBPB presents the LBRuT’s vision for the Site and provides guidelines on future uses, layout and design for the redevelopment of the Site. The overall vision is based on **“the desire to provide a new village heart for Mortlake based upon buildings and open public realm of the highest quality that will radically transform Mortlake whilst respecting the character and history of the area”** (SBPB, paragraph 1.3).
- 1.9 The scheme submitted under these Applications will 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 Statement summarises the Applications which comprise the scheme and assesses the Applications against relevant planning policy. This Statement concludes that the Proposed Development is in accordance with the Development Plan and supports the vision for the Site set out in the Development Plan and the SBPB.
- 1.11 A package of documents has been prepared by the Applicant’s project team which comprise the formal submission to the LBRuT.

2 Introduction

2.1 This Town Planning Statement (“the Statement”) has been prepared by Gerald Eve LLP on behalf of Reselton Properties Limited (“the Applicant”) in support of two 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”).

Proposals

2.2 The Applications seek planning permission for:

Application A:

“Hybrid application to include the demolition of existing buildings to allow for 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 9 storeys plus a basement of one to 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 servicing 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 equipment.**

Planning permission is also 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 servicing 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 highways works.”**

Application B:

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

2.3 Together, Applications A and B described above comprise the ‘Proposed Development’.

Background to Submission

2.4 The Applications follow earlier planning applications which were refused by the Greater London Authority (GLA). The refused applications were for:

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).

a) Application B – detailed planning application for the school (on land to the west of Ship Lane).

b) Application C – detailed planning application for highways and landscape works at Chalkers Corner.

2.5 The LBRuT (the Council) originally resolved to grant planning permission for Applications A and B but refuse Application C.

2.6 Following the LBRuT’s resolution to approve Applications A and B, the Mayor called-in the applications and became the determining authority. The Mayor’s reasons for calling in the applications were set out in his Stage II letter (dated 4 May 2020) but specifically related to concerns regarding what he considered was a low percentage of affordable housing being proposed for the Site and the need to secure a highways solution for the scheme following the LBRuT’s refusal of Application C.

2.7 Working with the Mayor’s team, the Applicant sought to meaningfully respond to the Mayor’s concerns on the applications. A summary of the revisions to the scheme made and submitted to the GLA in July 2020 is as follows:

i. Increase in residential unit provision from up to 813 units to up to 1,250 units;

ii. Increase in affordable housing provision from (up to) 17%, to 30%;

- iii. Increase in height for some buildings of up to three storeys;
- 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 car parking spaces reduction of 186 spaces and introduction of an additional basement storey under Block 1;
- vi. Internal layout changes and 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 to Chalkers Corner in order to mitigate traffic impacts through works to highway land only and allow the withdrawal of Application C.

2.8 Application A was amended to reflect these changes.

2.9 Notwithstanding this, and despite GLA officers recommending approval, the Mayor refused the applications in August 2021.

2.10 The Mayor's reasons for refusal in respect of Application A were:

- i. Height, bulk and mass: which would result in an unduly obtrusive and discordant form of development in this 'arcadian' setting which would be harmful to the townscape, character and appearance of the surrounding area;
- ii. Heritage impact: The proposal, by reason of its height, scale, bulk and massing would result in less than substantial harm to the significance of several listed buildings and conservation areas in the vicinity. The Mayor considered that the less than substantial harm was not clearly and convincingly outweighed by the public benefits, including Affordable Housing, that the proposals would deliver;
- iii. Neighbouring amenity issues: The proposal, by reason of the excessive bulk, scale and siting of Building 20 and 21 in close proximity to the rear of neighbouring residential properties in Parliament Mews and the rear gardens of properties on Thames Bank, would result in an unacceptable overbearing and unneighbourly impact, including direct overlooking of private

amenity spaces. The measures in the Design Code would not sufficiently mitigate these impacts; and

- iv. No section 106 agreement in place.

2.11 Application B was also refused because it was intrinsically linked with Application A and therefore could not be bought forward in isolation.

The Proposed New Scheme

2.12 This 3rd iteration of the scheme seeks to respond directly to the Mayors reasons for refusal and in doing so also addresses a number of the concerns raised by the LBRuT.

2.13 The amendments can be summarised as follows:

- i. A revised energy strategy is proposed in order to address the London Plan (2021) requirements;
- ii. Several residential blocks have been reduced in height to better respond to the listed buildings along the Thames riverfront and to respect the setting of the Maltings building, identified as a Building of Townscape Merit (BTM) by the LBRuT;
- iii. Reconfiguration of the layout of Buildings 20 and 21 has been undertaken to provide lower rise buildings to better respond to the listed buildings along the Thames riverfront; and
- iv. Chalkers Corner 'light' highways mitigation works.

2.14 The school proposals (submitted under 'Application B') are unchanged. The Applicant acknowledges LBRuT's identified need for a secondary school at the Site and the applications continue to support the delivery of a school. It is expected that the principles to be agreed under the draft Community Use Agreement (CUA) will be the same as those associated with the refused school application (LBRuT ref: 18/0548/FUL, GLA ref: GLA/4172a/07).

2.15 Overall, it is considered that together, the Applications respond successfully to the concerns raised by the GLA which also reflect some of the concerns raised by stakeholders in respect of the previous schemes and during pre-application discussions on the revised Proposed Development. It is considered that the scheme now represents a balanced development that delivers the principal LBRuT objectives for the Site.

3 Masterplan Application Components and Structure

- 3.1 To deliver a unified masterplan that creates a new village heart for Mortlake, a comprehensive site-wide approach has been taken to the masterplanning and design of the development. Alongside the overall masterplan, careful consideration has been given to the phasing and delivery of the key components of the scheme and the practicalities of how these can be brought forward without delay. Specifically, the land for the new secondary school would be transferred to the ‘School Developer’, and the Applicant would not be responsible for its construction.
- 3.2 Highway works at Chalkers Corner are required to mitigate the development of the school and/or the wider masterplan development i.e. they are necessary for any development of the Site. The required highway works involve development on the local highway, and strategic highway network. Planning permission is not required for the highway works, which can be secured and delivered under a Section 278 agreement.
- 3.3 To ensure that the school can be independently delivered by the relevant authorities without unnecessary constraints, two linked planning applications are proposed, as set out in Table 1.

Application	Type of Application	Summary of Works
A (Main masterplan)	Hybrid – some elements applied for in full detail and some applied for in outline.	Demolition of all buildings and structures (excluding the Maltings Building and the façades of the Former Hotel Building and the Former Bottling Plant) and comprehensive redevelopment of the former Stag Brewery site to provide a mix of uses.
B (School)	Full planning application-applied for in detail.	Erection of a six-form entry secondary school, plus higher education sixth form, and associated access and play facilities. Application to include provision for temporary works to allow access to school.

Table 1: Masterplan Applications

- 3.7 Separate red line boundaries for each application have been submitted. A plan showing both boundaries has also been submitted and included within this Town Planning Statement at Appendix A for illustration (ref. JA12_Z0_P_00_008). A series of supporting plans showing ownership and Development Area 1 and 2 boundaries have also been enclosed within Appendix A, and further red line plans have been enclosed within the submissions.
- 3.8 These Applications allow the school or the main masterplan scheme to be delivered independently of each other. However, importantly, the two planning Applications would be linked through a Section 106 legal agreement to ensure that Application B (School) land is handed over at an appropriate time.
- 3.9 Development Area 1 (part of Application A) and the School (Application B) are applied for in detail, and Development Area 2 (part of Application A) are applied for in outline. Given the scale of the development, construction would be carried out in phases on a plot-by-plot basis.
- 3.10 Table 2 demonstrates which elements of the scheme are applied for in full detail, and which are applied for in outline. The table should be read alongside the plans included at Appendix A (refs. C645_Z0_P_00_001 Rev B and JA12_Z0_P_00_008) and Phasing Diagram (Appendix A (iv)).

Scheme Component	Access	Appearance	Landscaping	Layout	Scale
<i>Application A – Mixed Use Scheme – Applied for in Detail (Development Area 1)</i>					
Phase 1	✓	✓	✓	✓	✓
Phase 2	✓	✓	✓	✓	✓
Phase 3	✓	✓	✓	✓	✓
<i>Application A – Mixed Use Scheme – Applied for in Outline (Development Area 2)</i>					
Phase 1	x	x	x	x	x
Phase 2	x	x	x	x	x

Phase 4	x	x	x	x	x
<i>Application B – School – Applied for in Detail</i>					
School	✓	✓	✓	✓	✓

Table 2: Application Structure – Detailed Elements Applied For

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

x Reserved matter. Details of the design to be subsequently agreed with LBRuT through the submission of Reserved Matters Applications pursuant to planning conditions on the outline planning permission.

Application A – Hybrid Application – Main Masterplan scheme

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

Application B – Detailed Application - School

- 3.14 The proposed school has been designed in conjunction with the LBRuT, the Education and Skills Funding Agency (ESFA) and other relevant stakeholders. The Applicant will provide the land for the new school and play/sports facilities and LBRuT/ESFA would be responsible for the delivery of the school.

- 3.15 Application B includes provision for interim works which would enable either the school or the masterplan to function independently in circumstances where either the school or the masterplan build programmes do not fully align (plan ref: 38262/5501/108 G, prepared by Stantec). Importantly, as both proposals reach the point of completion, it is intended that there would be provisions to ensure that any interim works are upgraded to the proposed permanent works which would ensure full integration of both sites.

Highways Works

- 3.16 The works proposed to Chalkers Corner are on highway land and have been designed to mitigate the effect of the development. A range of other highways works are also required in connection with the masterplan as set out within the Transport Assessment (TA) and highway plan drawings, all prepared by Stantec. The design of the highways mitigation works was thoroughly tested and agreed with Transport for London (TfL) officers under the Original Applications. This matter was not a reason for refusal and no change is proposed under these new applications.

Illustrative Works

- 3.17 There are also potential future opportunities for further landscape improvement works to Mortlake Green which are shown, indicatively, in some of the planning application documents, including the Landscape Design and Access Statement, prepared by Gillespies (page 20). These works would have benefits in terms of improving pedestrian access and connection routes from Mortlake rail station to the Site.

Application Documents – Submission Structure

- 3.18 An Environmental Statement ('ES') has been prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). In addition, several stand-alone reports have been prepared in accordance with LBRuT's validation requirements and as agreed with LBRuT officers within the Planning Performance Agreement, dated 7 January 2022.
- 3.19 Although the redevelopment proposals are the subject of two separate applications for planning permission, the majority of the submitted application documents, reports and assessments consider the development proposals as a collective whole (i.e. the scope of development proposed under both applications for planning permission). Such documents are submitted under Applications A and B. Application B is accompanied by additional documents, drawings and reports relating specifically to the proposed works in respect of the proposed school.



3.20 Throughout this Town Planning Statement reference is made to the proposed building numbers, as shown on plan ref. C645_MP_P_00_001 Rev E, prepared by Squire & Partners. The plan has been included at Appendix A of this Statement and submitted separately as part of the Applications.

4 The Development Proposals

- 4.1 The Proposed Development seeks to create a new village heart for Mortlake through the provision of a mix of uses, high quality architecture, public realm and landscaping which encourages activity and permeability throughout the Site, helping to link Mortlake Green through to the riverside.
- 4.2 The masterplan would provide homes (including affordable homes), alongside a range of complementary commercial uses and community facilities for use by the new and existing local population. The masterplan would also deliver a new six form entry secondary school, plus higher education sixth form, in line with identified needs for the Borough.
- 4.3 The design of the development has evolved with consideration of the following key design principles which reflect the objectives set out within Section 5 of the SBPB:
- a) To 'open up' the Site through the delivery of a comprehensive scheme which would deliver a variety of public open spaces and enable public pedestrian and cycling permeability throughout;
 - b) To create a new green link from Mortlake Green to the riverside and encourage activity along the riverside through the provision of a range of uses and an attractive public realm;
 - c) To deliver a truly mixed use development through the provision of housing, employment opportunities, community (including a school), leisure and retail uses, all of which would contribute to, and would help to enhance and expand, the existing Mortlake community;
 - d) To recognise the historic importance of the Site and celebrate the historic buildings and features;
 - e) To deliver buildings and spaces of architectural excellence, which take design cues from the surrounding area and which seek to deliver design diversity and interest and which are sustainable;
 - f) To deliver the necessary transport and highways works to mitigate any adverse transport and parking impacts on the transport network; and
 - g) To be financially viable and commercially deliverable, and to deliver the maximum reasonable amount of affordable housing.

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

Application A – Hybrid Application – Mixed Use Scheme

- a) Whilst a comprehensive development is proposed across the whole of the Application A site, the Proposed Development can be split into two distinctive land use zones:
 - b) Land to the east of Ship Lane (applied for in detail) – Development Area 1; and
 - c) and to the west of Ship Lane (applied for in outline) – Development Area 2.
- 4.5 The boundaries of Development Areas 1 and 2 are shown on submitted plan ref. JA12_ZO_P_00_008, (see Appendix A of the Statement).

Development Area 1

- 4.6 Within Development Area 1, both residential and non-residential land uses are proposed, making this area of the Proposed Development more commercial in nature. In line with the aspirations of the SBPB, a new ‘green link’ will bisect the eastern side of the Site, providing a large open space which would link Mortlake Green to the riverside.
- 4.7 The green link will terminate at the Maltings Plaza, a new large public square which has been designed to connect to the surrounding buildings, the green link and the riverside. The existing Maltings building (Building 4) would be retained and refurbished to provide flexible commercial uses at ground floor. It is proposed to introduce new large windows at ground floor level of the Maltings Building to remove the current blank frontage and help link the building to Maltings Plaza. The new buildings along the riverside would incorporate ground floor flexible uses of a range of different types (see Section 10 of this Town Planning Statement). It is also proposed to provide a new riverside walk (the ‘Riverside Terrace’) which would extend from the Maltings Plaza along the frontage of the new buildings within Development Area 1. These works, along with the proposed works to upgrade the existing towpath and the provision of a new flood wall, would contribute to enlivening and activating the riverside space.
- 4.8 A new ‘high street’, to be known as ‘Thames Street’, would run parallel to Mortlake High Street/Lower Richmond Road. This area would provide restaurants, cafés, retail, community, leisure and office spaces and it is envisaged that many of these uses would provide outdoor seating and amenity areas.

Thames Street would be fully pedestrianised, with limited vehicle access (for servicing and emergency use only).

- 4.9 To the south of Thames Street, the Former Hotel Building and the Former Bottling Building (Buildings 5 and 6) would be redeveloped behind a retained façade to provide office floorspace, flexible commercial space and a small hotel / pub with rooms. An area of community use space is also proposed to the ground floor of Building 5. The new 'Bottleworks Square' public space behind these blocks would provide an attractive and functional public space which would complement the flexible commercial and community uses.
- 4.10 A new cinema, with office floorspace above and café use at ground floor level, would be located adjacent to the proposed new green link within Building 1.
- 4.11 To ensure flexibility, ground floor elements of various buildings within Development Area 1 are proposed for flexible uses, as detailed in Table 3 below.

Block Number (see plan ref: C645_MP_P_00_001 Rev E (Appendix A))	Flexible uses proposed		
	Floors	Use (by Use Class)	Area (GIA sqm)
1	Ground	Café	122
2	Ground	Class E / Sui generis drinking establishment	404
4	Ground/ First	Class E / Sui generis drinking establishment	472
5	Basement 1/ Ground (part)	Class E / Sui generis drinking establishment / F1	1,187
6	Ground	Class E / Sui generis drinking establishment	457

7	Ground	Class E / Sui generis drinking establishment	617
8	Ground	Class E / Sui generis drinking establishment	442
9	Ground	Class E / Sui generis drinking establishment / F1 / Boat House	347
10	Ground	Class E / Sui generis drinking establishment / F1	97
11	Ground	Class E / Sui generis drinking establishment	328
12	Ground	Class E / Sui generis drinking establishment	367
Total Flexible Use Space			4,839

Table 3: Flexible Uses Proposed

4.12 To avoid over-dominance of any particular use, maximum floorspace caps within each land use class are proposed. The caps for each land use are proposed as shown in Table 4:

Land Use	Minimum Cap for Flexible Floorspace (GIA sqm)	Maximum Cap for Flexible Floorspace* (GIA sqm)
Retail (Class E)	-	2,200
Financial and Professional Services (Class E)	-	220

Café/restaurants (Class E)	-	2,400
Drinking establishments (sui generis)	-	1,800
Offices (Class E)	2,000	2,200
Community (Class F1)	-	1,300
Boathouse (sui generis)	-	380

Table 4: Maximum and minimum caps for flexible floorspace by land use

* the combined total of these uses would not be able to be implemented as the maximum cap for the flexible areas would be controlled via the overall Flexible Use floorspace cap ie. 4,839 sqm (GIA)

- 4.13 A 'High Street Zone' within Development Area 1 has been identified, comprising 2,354 sqm (GIA) of the overall flexible use space (see plan ref. C645_Z1_P_00_001 Rev C (Appendix A)). The High Street Zone should comprise a significant proportion of Class E 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 Class E retail.
- 4.14 Development Area 1 would deliver 558 residential units which would generally be delivered at first floor and above in mixed use buildings, aside from block 3 which is residential only. Block 10 would provide up to 48 affordable housing units.
- 4.15 In terms of access, pedestrian and cycle routes would be created throughout and would link the eastern and western parts of the Site to each other whilst also linking the Site to Mortlake Green and from Mortlake. A single storey basement is proposed to be constructed under Development Area 1 and car and cycle parking for the residential and non-residential uses would be located here, along with plant and refuse stores which would service this part of the Site. Access to the basement would be via Ship Lane (two-way entry/exit) and Mortlake High Street (two lane entry, left turn exit only).
- 4.16 The eastern side of the Site would provide 11 new buildings (12 in total including the Maltings Building) ranging from 3 to 9 storeys. There are no full 9 storey buildings proposed but 2 buildings would be provided with 'turret' style accommodation providing residential accommodation at the 9th storey. Building 8 will have a set-back 'mansard' 9th floor level. Every other proposed building

would be 8 storeys or lower. Broadly speaking, the design of the buildings follow one of two typologies – mansion block and warehouse. Further details on the proposed building design can be found within Sections 12 and 13 of this Statement and within the submitted Design and Access Statement (DAS), prepared by Squire & Partners.

Development Area 2

- 4.17 Development Area 2 is located on the western side of Ship Lane and is applied for in outline. This part of the Site would be residential in character with less activity, resulting in a calmer, quieter space.
- 4.18 Blocks 13, 14, 15, 16 and 17 would comprise private residential apartments and blocks 20 and 21 would each provide a terrace of private town houses. All residential accommodation would have amenity space in the form of private gardens for town houses and courtyard amenity space (publicly accessible) for the apartments.
- 4.19 Blocks 18 and 19 would provide up to 165 residential units, of which up to 100% would be affordable, on a habitable rooms basis and subject to viability discussions.
- 4.20 A single storey basement would extend under blocks 15, 16, 17 and part of block 13. The basement would provide car and cycle parking for the residential uses alongside plant. The basement would be accessed from the west of Ship Lane.
- 4.21 In total, Development Area 2 would deliver 9 new buildings which range in height from 3 storeys to 8 storeys, as shown on the planning application drawings, prepared by Squire & Partners.
- 4.22 This portion of the Site would also deliver a significant amount of publicly accessible open space, the largest being the new community park which would be provided to the south of the new school play facilities. This park would provide playspace for children as well as amenity space for new and existing Mortlake residents.

Application B – Detailed Application - School

- 4.23 To the west of Building 15 it is proposed to deliver a new three storey six form entry secondary school, which would accommodate approximately 1,200 students designed in accordance with ESFA standards. Associated play facilities would be provided which include roof level informal play facilities, an indoor sports hall, an external Multi Use Games Area ('MUGA') and a full sized outdoor artificial playing pitch and associated spectator spaces. The school, which will implement a Travel Plan (submitted under Application B), will have a limited amount of car parking, located at grade.

4.24 The proposed external playing pitch will be a 3G surface to meet the requirements of the ESFA for intensive school use and to enable community use outside of school hours. There is an identified, unmet demand for these types of pitches in the Borough which allow for a range of sports and games to be played on a high quality, versatile and robust surface all year round. The pitch would be floodlit which would enable use into the evenings (as detailed within the submitted Lighting Masterplan, prepared by Michael Grubb Studio). A Community Use Agreement will secure use of the facilities by the local community and sports groups out of school hours and in school holidays (a draft Agreement has been submitted alongside this application, appended to the submitted Open Space and Playing Pitches Assessment). This Agreement would also apply to the internal facilities within the school. The plans for the sports facilities, in particular the external 3G playing pitch, have been developed in close consultation with Sport England, the Football Association and local sports groups. Further detail on this element of the proposals can be found in the submitted Open Space and Playing Pitches Assessment ('OSPPA'), prepared by Gerald Eve LLP, and supporting appendices.

4.25 As detailed in Section 15 of this Town Planning Statement, interim infrastructure works are proposed as part of Application B in the event that the school comes forward independently of Application A. This would enable the school to be operational as soon as possible. The permanent road works, which are demonstrated on highways plan refs: 38262/5501/100 Rev H and 38262/5520/02 Rev A, would be secured via the Reserved Matters submissions associated with the elements applied for in outline under Application A. Further details can be found within the submitted Transport Assessment and the Design and Access Statement Volume 4: Secondary School Design, prepared by Squire & Partners.

Land Use - Summary

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

Land Use	Proposed GIA sqm
Application A – Hybrid Application (Detailed Elements, Development Area 1) – Mixed Use Scheme	
Residential	558 residential units

Flexible Uses	4,839 sqm
Offices	4,547 sqm
Cinema	1,606 sqm
Hotel/pub with rooms	1,765 sqm
Basement car park	19,474 sqm
APPLICATION A DETAILED ELEMENTS SUB-TOTAL	92,949 sqm (including residential)
Application A – Hybrid Application (Outline Elements, Development Area 2) – Mixed Use scheme	
Residential	Up to 527 units
Basement car parking	Up to 5,532sqm
Application B – Detailed Application - School	
School	9,319 sqm
APPLICATION B SUB-TOTAL	9,319 sqm

Table 5: Proposed Area Schedule (Squire & Partners, Rev I)

Phasing

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



Chapter within the ES (Chapter 6), prepared by Waterman IE, provide further details of the proposed construction processes, programme and phasing.

5 Site and Surroundings

- 5.1 This section describes the Site's location and context.
- 5.2 The Site is located within the LBRuT and comprises of a single site, split in to two parts for the purposes of the Applications (A and B). The Site is: the former Stag Brewery which sits between Lower Richmond Road and the River Thames, to the north of Mortlake Green.

Site Description

- 5.3 The former Stag Brewery Site occupies a 9.25 ha site which is bounded by Lower Richmond Road to the south, the river Thames and the Thames Bank to the north, Williams Lane to the east and Bulls Alley (off Mortlake High Street) to the west. The Site is bisected by Ship Lane, which runs in a north-south direction, between the Jolly Sailor public house on Lower Richmond Road and the Ship public house on Thames Bank.
- 5.4 The Site currently comprises a mixture of large-scale industrial brewing structures dating from the late twentieth century, a number of nineteenth and early twentieth century structures, large areas of concrete or tarmac hardstanding and playing fields. The existing floorspace on Site comprises 35,402 sqm (GIA). The Stag Brewery Site was sold by AB InBev in December 2015 as it was surplus to the company's requirements and brewing operations were winding down. The Site was purchased by Reselton Properties Limited. In 2017, a major programme of decommissioning works was undertaken on Site, and this was carried out until October 2017.
- 5.5 The existing playing fields found in the South West corner of the Site measure approximately 2.06 ha and were originally owned and used by workers of the Stag Brewery. The pitches remain in private use with no access to the general public. Through agreement with the Applicant, the playing pitches are used by Barnes Eagles for matches and training at weekends, by Thompson House School for sports and games on Tuesday afternoons and by St. Mary Magdalen School once a year for sports day. Full details of the current arrangements are included within OSPPA, prepared by Gerald Eve LLP and submitted in support of the applications.
- 5.6 To the east of Ship Lane, the Site is surrounded by a large wall, which blocks the ground floor from street views. To the west of Ship Lane elements of the Site are still enclosed by walls in some places, and in others (for example, along the side of the playing fields), fences mark the boundary lines instead.

- 5.7 To the north of the Site there is an existing towpath which runs between Ship Lane and Bulls Alley. This area forms part of the Application A boundary. The towpath is publicly accessible although at times (high tide) it is flooded to the Site edge and inaccessible.

Heritage

- 5.8 A small section of the Site running along Mortlake High Street and the Thames shoreline is located within the Mortlake Conservation Area. The Site is directly opposite the Mortlake Green Conservation Area to the south and the Grove Park Conservation Area to the north, on the opposite side of the river (within the London Borough of Hounslow).
- 5.9 Three buildings within the Site are identified by LBRuT as Buildings of Townscape Merit (BTM):
- a) The Former Maltings Building, which is located on the banks of the Thames;
 - b) The Former Bottling Plant (also referred to as 'the Former Bottling Building'), which is located on the junction of Mortlake High Street and Lower Richmond Road; and
 - c) The Former Hotel Building, which is located adjacent to the former Bottling building on Mortlake High Street.
- 5.10 Parts of the surviving boundary walls which surround part of the Site are also considered by LBRuT to contribute to the character of the Mortlake Conservation Area and form a surviving element of the pre-nineteenth century brewery. Historic gates, two memorial plaques and timber river moorings are also present on the Site.
- 5.11 The following listed buildings and structures are within the immediate vicinity of the Site:
- a) Thames Cottage, Tudor Lodge, Thames Bank House, Leyden House and Riverside House, all Grade II listed and all located along Thames Bank, to the north west of the Site;
 - b) The garden wall to the east of number 1 to 8 Riverside House and extending behind numbers 1 to 24 Reid Court which is Grade II listed and located along the north east boundary of the Site, but not within the application boundary;
 - c) The gateway (formerly to Cromwell House), located at the northern end of Williams Lane, which is Grade II listed and directly to the west of the Site; and

- d) Chiswick Bridge and attached balustrades, Grade II listed, situated to the north west of the Site.

5.12 There are also a number of identified Buildings of Townscape Merit within close proximity to the Site including:

- a) The Jolly Gardeners Pub, located on the corner of Lower Richmond Road and Ship Lane;
- b) The Ship Pub, located at the corner of Ship Lane and the Thames Bank;
- c) The Old Stables, Thames Bank;
- d) 6 and 7 Thames Bank; and
- e) 1-14 Parliament Mews.

Site Designations and Transport Rating

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

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

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

5.15 Alongside the adopted site allocation (SA24) within the Local Plan, the Site is subject to the adopted SBPB (July 2011). The SBPB provides guidelines on future uses, layout and design for the redevelopment of the Site and is a material consideration in the determination of any planning application relating to the Site.

5.16 In terms of accessibility, the majority of the Site has a PTAL rating of 2 (poor), with a section of the Site classified as PTAL 1 (very poor). However, as noted in the submitted Transport Assessment (TA) (paragraph 4.6.2), the PTAL 1 rating does not take into account existing bus services and it has been agreed with TfL that the PTAL rating for the whole Site should be PTAL 2. Mortlake railway station is located within a 5-minute walk to the Site and provides links to central London and Richmond. The Site is not subject to any other London Plan designations. The bus services available immediately outside the Site, including Routes 209 and 533 have been affected by the Hammersmith Bridge closure and terminate to the southside of the river. TfL are closely monitoring the situation to ensure that bus networks are fully utilised and meeting the demand of their passengers. An updated table showing the bus routes with the Hammersmith Bridge Closure is included at Table 4-1 of the TA.

Surrounding Area

5.17 The Site is situated between Chiswick Bridge to the east and Barnes Bridge to the west, and within the Mortlake Village boundary, as identified by the Mortlake Village Planning Guidance SPD (December 2015). Mortlake Village is made up of local commercial and community uses with residential use throughout. The main commercial focus is in the historic core of the village, at the eastern end of Mortlake High Street. Mortlake village centre close to the Site and comprises local shops and services and employment uses. Directly to the south of the Site sits Mortlake Green, an important local green space within Mortlake.

5.18 Richmond town centre and Kew are located to the east of the Site, East Sheen is to the south (and is the closest designated District Centre to the Site) and Barnes town centre is to the west of the site. Directly opposite the Site, across the River Thames, is Dukes' Meadow Golf & Tennis sports venue, which is located within the London Borough of Hounslow.

5.19 The context of the surrounding area is varied in terms of scale, context and materials as a consequence of gradual historic evolution. The Mortlake Conservation Area, which covers part of the Site, is described as having been derived principally from its relationship with the River Thames and is composed of three distinct sub-areas: 'Thamesbank', 'Mortlake Riverside' and 'The Village'.

5.20 The Mortlake Green Conservation Area is described as **“an area of late Victorian and early Edwardian buildings which have an identifiable industrial character although many are different in style”** (Mortlake Green Conservation Area Statement, page 1). The scale of the buildings within this area is from two to four storeys. The buildings consist of predominantly residential terraced houses and cottages around the Green as well as a number of buildings of social and architectural importance



including the railway station, Railway Tavern on Sheen Lane and the Jolly Gardeners and Tapestry public houses that form a 'gate' to the Green on Lower Richmond Road.

6 Recent Planning History

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

Site History - Overview

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

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

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

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

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

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

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

2018 Applications

6.9 On 19 February 2018 three linked applications for the masterplan redevelopment of the Site (refs. 18/0547/FUL ("Application A"), 18/0548/FUL ("Application B") and 18/0549/FUL ("Application C"))

were submitted to the LBRuT after extensive consultation with the LBRuT and the general public since early 2016.

- 6.10 The Applications were considered at LBRuT's Planning Committee on 29 January 2020 with a recommendation for approval by LBRuT officers. The Committee resolved to approve Applications A and B and resolved to refuse Application C.
- 6.11 On 4 May 2020 the Mayor of London directed that he would act as the local planning authority for the purposes of determining Applications A, B and C. On 25 November 2020 the Applicant withdrew Application C following detailed discussions with TfL officers on an alternative highways solution which was agreed could be dealt with via a Section 278 Highways Agreement.
- 6.12 On 27 July 2021 the Mayor directed that Applications A and B be refused. The decision notices, dated 17 August 2021, set out the reasons for refusal (Appendix B).

Other Site Planning History

- 6.13 Key planning applications available online are referenced below. A complete planning history schedule for the Site is included at Appendix C.
- 6.14 On 17 October 1977 planning permission (ref: 77/0459) was granted for the following:
"Demolition of the existing sports pavilion and the erection of new building for the conditioning/storage and distribution of beer; erection of new sports pavilion incorporating flat."
- 6.15 On 2 May 1979 planning permission (ref: 79/0215) was granted for the following:
"Extension for housing compressors, yeast tanks and small office, provision of frame and cladding for housing balloon."
- 6.16 On 11 March 1986 planning permission (ref: 85/1292) was granted for the following:
"Extension to beer conditioning building for production and distribution of beer. (Amended Plan No. 100/374/6 received on 15.11.85; and additional plan 866/1A received 30.12.85)."
- 6.17 On 16 March 1995 planning permission (ref: 94/3216/FUL) was granted for the following:
"Erection of new bottling plant"
- 6.18 On 13 April 1995 planning permission (ref: 95/1625/FUL) was granted for the following:

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

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

6.20 **“Development comprising the relocation of an existing tank for the storage of sodium hydroxide used in the operations of the brewery. Extension of bounded area.”**

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

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

6.22 On 12 June 2020 an application for the temporary use of the Site (ref: 19/3870/FUL) was approved:

“Full planning application for the temporary use of the existing buildings and land for a period of 2 years for film production operations (B1 use) and ancillary activities and the associated use of the existing on-site parking spaces with access from Lower Richmond Road and Ship Lane”

7 Consultation and Community Engagement

- 7.1 The Localism Act 2011 emphasises the need to involve and engage with the local community during the planning process.
- 7.2 The National Planning Policy Framework ('NPPF') confirms that **“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community”** (paragraph 39).
- 7.3 In addition, paragraph 41 of the NPPF notes that **“the more issues that can be resolved at pre-application stage, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists LPAs in issuing timely decisions, helping to ensure that Applicants do not experience unnecessary delays and costs”**.
- 7.4 The proposals have been subject to extensive pre-application discussions with the LBRuT planning, design, highways and other officers since spring 2016. Detailed pre-application discussions have also taken place with representatives from the GLA, and Transport for London ('TfL') since January 2017. More recently, the Applicant entered into a Planning Performance Agreement, dated 7 January 2022, and held a series of meetings with the LBRuT planning, energy, viability and legal representatives ahead of the submission of these Applications. Meetings held with LBRuT as part of these Applications are set out at Appendix E of this Statement.
- 7.5 Since the acquisition of the Site, the Applicant has been involved in a comprehensive programme of consultation and engagement with the local community since the installation of a pop-up at Mortlake Fair on 25 June 2016. Extensive consultation has taken place directly with local residents and local stakeholders on the previous schemes (refs: 18/0547/FUL; 18/0548/FUL and 18/0549/FUL).
- 7.6 Consultation on the development proposals submitted under these Applications has taken the form of:
- i. two public notification events (held on 26 and 27 January 2022) with question-and-answer opportunities for attendees;
 - ii. the circulation of a newsletter to the local community; and

iii. the updating of the webpage to reflect the revised proposals.

7.7 Section 5 of the submitted Statement of Community Involvement (SCI), prepared by Soundings, sets out the recent public notification process in detail. The majority of the comments did not raise any issues that have not previously been raised or considered. Some comments regarding construction/delivery were raised in this consultation process that were not captured under the previous SCI. Appendix 7.6 of the SCI comprises the '2018 Statement of Community Involvement' which demonstrates the extensive community consultation exercise undertaken in respect of the Original Applications.

7.8 Those consulted throughout the design development process, for both the Proposed Development and the Original Applications, are:

- a) LBRuT planning, design, highways and other officers;
- b) GLA officers;
- c) TfL officers;
- d) LBRuT Councillors;
- e) Local community via public exhibitions, CLG meetings and presentations, one-on-one meetings and webinar public notification events;
- f) ESFA;
- g) Sport England;
- h) The Football Association;
- i) The Football Foundation;
- j) Network Rail;
- k) South-West Trains;
- l) The Port of London Authority ('PLA');
- m) The Environment Agency;

- n) The National Health Service;
- o) Richmond Clinical Commissioning Group;
- p) The Greater London Archaeology Advisory Service ('GLAAS')
- q) The Mortlake Brewery Community Group ('MBCG');
- r) Thames Bank, Barnes and Mortlake History Society representatives;
- s) Thomson House School parents;
- t) The Towpath Group/West London River Group; and
- u) Three Registered Providers (Paragon Asra, Richmond Housing Partnership and Thames Valley Housing Association).

LBRuT Design Review Panel

- 7.9 London Plan Policy D4 states that schemes of the scale of the Proposed Development should have undergone a design review process prior to the submission of any application for planning permission.
- 7.10 On 30 September 2021 the Proposed Development was presented to LBRuT's Design Review Panel (DRP) for the first time.
- 7.11 The DRP's formal comments were received on 21 November 2021 in which the Panel indicated it was **'generally supportive'** of the original masterplan.
- 7.12 A second DRP was held on 2 February 2022 with formal comments received on 28 February 2022.
- 7.13 The DRP feedback and Applicant response is summarised in Section 14 and is discussed in detail within the Design and Access Statement (pages 45-48 and 52).

Interim conclusion

- 7.14 Over the course of the consultation process, dating back to 2016 when the first events were held on the Original Applications, the proposals have evolved significantly in direct response to comments received by consultees.

- 7.15 Significant amendments have been made to the design, layout and quantum of development as a result of the consultation discussions, both pre-application and post-application, including:
- i. The location of the school building
 - ii. The location, size and form of the green link;
 - iii. The scale and extent of the proposed transport and highways mitigation works;
 - iv. Building heights and design;
 - v. Extent of the basement;
 - vi. Energy strategy; and
 - vii. Quantum of development.
- 7.16 **The final masterplan is the result of an extensive period of ongoing consultation with relevant local groups, stakeholders and decision-making bodies. Significant amendments have been made to the scheme because of these discussions. The scheme therefore complies with the Localism Act's duty to engage with the local community during the planning process.**

8 Planning Policy Framework and Legislation

- 8.1 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.
- 8.2 In addition to the requirement of Section 38(6) of the Planning and Compulsory Purchase Act 2004, LBRuT has a legal duty under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, to have special regard to the desirability of preserving listed buildings or their settings, and to pay special attention to the desirability of preserving or enhancing the character and appearances of conservation areas.

Adopted Planning Policy

- 8.3 The adopted Development Plan for the Site comprises:
- i. London Plan (2021); and
 - ii. The London Borough of Richmond upon Thames Local Plan (2018) (as amended in 2020).

National

- 8.4 The National Planning Policy Framework ('NPPF') published in 2021 sets out the Government's economic, environmental and social planning policies for England and supersedes the vast majority of Planning Policy Guidance Notes and Planning Policy Statements. It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 8.5 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
- 8.6 The NPPF establishes the presumption in favour of sustainable development. Specifically, paragraph 81 states that the planning system should do all that it can to promote sustainable

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

Planning Practice Guidance

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

Regional

- 8.9 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.
- 8.10 The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.
- 8.11 The following GLA Supplementary Planning Guidance ('SPG') documents have also been reviewed and the provisions considered in the evolution of the masterplan:
 - i. Housing SPG (2016)
 - ii. Social Infrastructure (2015);
 - iii. Play and Informal Recreation (2012) and Playspace Calculator (2019);
 - iv. Planning for Equality and Diversity in London (2007)
 - v. Affordable Housing and Viability SPG (2017)
 - vi. London Housing Strategy (2018)
 - vii. Shaping Neighbourhoods: Character and Context (2014);
 - viii. Shaping Neighbourhoods: Play and Informal Recreation SPG, (2012);
 - ix. Accessible London: Achieving and Inclusive Environment SPG (2014);

- x. London's Foundations SPG (2012);
- xi. Mayor's Air Quality Strategy SPG (2010);
- xii. London Regional Flood Risk Appraisal (2018) and
- xiii. The Control of Dust and Emissions During Construction and Demolition (2014).

8.12 Other GLA guidance relevant to the Applications and which has informed the proposals includes:

- i. Air Quality Positive (consultation due);
- ii. Fire Safety (consultation due);
- iii. Transport Land (consultation due);
- iv. Urban Greening Factor (consultation due);
- v. Sustainable Transport, Walking and Cycling (draft)
- vi. Circular Economy Statements (draft);
- vii. 'Be Seen' Energy Monitoring Guidance (draft);
- viii. Characterisation and Growth Strategies (draft);
- ix. Optimising Site Capacity: A Design-led approach (draft);
- x. Housing Design Standards (draft);
- xi. Public London Charter (September 2021); and
- xii. Whole Life Carbon Assessments (draft).

Local

8.13 The LBRuT Local Plan was adopted on 3 July 2018. The adopted Local Plan replaced the previous policies within the Core Strategy and Development Management Plan. The Plan sets out policies and guidance for the development of the borough until July 2033 or until it is superseded.

8.14 Two legal challenges were made regarding the adoption of the LBRuT's Local Plan. On 3 March 2020, the Council adopted the two matters related to the legal challenges within the Local Plan.

8.15 The LBRuT have published the following relevant planning guidance documents:

- i. Affordable Housing (2014);
- ii. Buildings of Townscape Merit (May 2015);

- iii. Design Quality (206);
- iv. Refuse and Recycling Storage Requirements (May 2015);
- v. Residential Development Standards (2010);
- vi. Sustainable Construction Checklist (January 2016)
- vii. Climate Emergency Strategy 2020-2024 (Jan 2020);
- viii. Air Quality (June 2020);
- ix. Transport (June 2020); and
- x. Planning Obligations (June 2020).

Emerging Planning Policy

Local

- 8.16 LBRuT are now in the process of preparing a new Local Plan.
- 8.17 Between 10 December 2021 and 31 January 2022, the LBRuT carried out pre-publication consultation on the draft Plan and SA (Regulation 18). Representations to this consultation were submitted on behalf of the Applicant by Gerald Eve LLP (dated 31 January 2022).
- 8.18 Looking ahead, the timetable towards the adoption of the new Local Plan (as shown on LBRuT's website) is:
 - i. Publication consultation on the Council's final version of the Plan and final SA report (Regulation 19): Summer 2022 (after local elections);
 - ii. Submission of the Council's final version of the Plan to the Planning Inspectorate: Winter 2022/23;
 - iii. Independent Examination in Public: Summer 2023; and
 - iv. Adoption of the Local Plan: Summer 2024
- 8.19 LBRuT are also in the process of updating the adopted Policies Map (2015).

8.20 Given the early stages of the consultation on the draft new Local Plan, the plan has limited weight in planning decision making in the borough at this time.

Further Statutory Legislation

8.21 Given the Site's location within the Mortlake Conservation Area and the presence of statutorily listed buildings nearby the application Site, statutory legislation regarding the historic environment is relevant to the planning applications.

8.22 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

8.23 Section 72 of the same Act provides that, in respect of development affecting conservation areas, special attention should be paid to the desirability of preserving or enhancing the character and appearance of that area.

9 Planning Considerations - Principle of Redevelopment

- 9.1 **The principle of comprehensive mixed-use redevelopment at the Site accords with planning policies and guidance at all levels, which seek to bring forward appropriate sites, in appropriate locations for residential-led mixed-use development. Locally, the adopted SBPB and Local Plan development allocation (Policy SA 24) contain detailed information regarding the form of development that should be delivered at the Site.**

Planning Policy

- 9.2 At the heart of the NPPF is the presumption in favour of sustainability development which meets social, economic and environmental needs. One of the core principles in the NPPF (paragraph 119) is that planning should encourage the effective use of land by reusing land which has been previously developed (brownfield land). The NPPG also promotes mixed-use developments and encourages patterns of growth which focus significant development in locations which are, or can be made, sustainable.
- 9.3 Paragraph 120 (parts a, c and d) of the NPPF goes on to set out planning policies and decisions should: encourage multiple benefits from urban land including through mixed use schemes; give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs; and promote and support development of under-utilised land and buildings, especially if this would help to meet identified need for housing where land supply is constrained and available site could be used more effectively.
- 9.4 The London Plan 'Good Growth' objectives reflect the NPPF's sustainable development aims. London Plan Policies GG1, GG2, GG3, GG4, GG5 and GG6 support intensified, high-density, mixed use and mixed housing tenure places. Particularly on sites well connected by existing or future public transport, walking and cycle connections; development on brownfield land, particularly in Opportunity Areas and on surplus public sector land, promoting industrial and employment space in the right locations; and new and improved green infrastructure.
- 9.5 The London Plan housing policies (Policies H1 and H10) seek to deliver significant housing across all of London's Boroughs and require developments to optimise housing output having regard to local context and character. Policy H1(B)(2) seeks to ensure that boroughs achieve their ten-year housing delivery targets by optimising the potential for housing delivery on all suitable and available brownfield sites. It also suggests that these large developments should

have a mix of uses to make the best use of the land available, whilst providing for those who reside in these areas (Part F).

- 9.6 At a local level, LBRuT Local Plan Policy LP 30 encourages developments which promote health and wellbeing, through following the principles of sustainable development and delivering inclusive development alongside sustainable modes of travel, green spaces, and social infrastructure.
- 9.7 In line with the above policy framework, LBRuT have adopted a plan-led approach to deliver a comprehensive mixed-use development at the former Stag Brewery. The SBPB was adopted following extensive local community consultation. The document sets out the key planning objectives and aspirations for a comprehensive mixed-use development at the Site.
- 9.8 The Site is also subject to an adopted Site Allocation (LBRuT Local Plan SA 24) which promotes the principle of the Site's sustainable mixed-use redevelopment as follows:

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

Assessment

- 9.9 The principle of the redevelopment of the Site is supported both by policy at a strategic London-wide level and the policies and objectives of the LBRuT Local Plan.
- 9.10 LBRuT support the principle of the redevelopment of the Site as demonstrated by the LBRuT Planning Committee's resolution to approve previous applications (refs: 18/0547/FUL and 18/0548/FUL) and the adopted Site Allocation SA 24. The GLA's Stage 1 (dated 30 July 2018)

response (paragraph 99) highlights strategic support for the Site's redevelopment, stating: **“the redevelopment of this brownfield site for mixed use development is supported in line with London Plan and draft London Plan policies.”**

9.11 The GLA Hearing Report, dated 27 July 2021, agreed with the Stage 1 position, recommending the Original for approval.

9.12 There is a clear need and priority to increase the provision of homes in LBRuT. The London Plan has revised the ten-year housing target for the LBRuT, to 4,110 (up from 3,150 in the previous London Plan). The Proposed Development would make a critical contribution (26.4%) to the borough's ten-year housing target, in an established, sustainable location which has been actively promoted for residential-led mixed-use redevelopment.

9.13 In addition, Application B proposes the erection of a new secondary school with a sixth form. At a strategic level, the GLA acknowledge in their Stage II report, dated May 2020 (paragraph 40), and the Stage III report, (paragraph 248), that a secondary school at the Site would meet an identified need. The LBRuT Committee Report states that **“education use is wholly supported and is regarded as a positive attribute of the scheme”** (paragraph 7.1.130), fully supporting its delivery as part of the Proposed Development.

9.14 There are three main considerations relevant to determining if the Proposed Development would be acceptable in principle, which are responded to below:

- a) Are there existing physical and/or environmental constraints that would prevent the Site being redeveloped?
- b) Does the proposed redevelopment meet the requirements and expectations of land use planning policy at all levels?
- c) Is the loss of the existing (former) land use acceptable?

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

9.15 The Applications, and the various accompanying assessment reports (including the ES) conclude that there are no in-principle reasons (for example relating to physical constraints, contamination, flood risk, archaeology, ecology and other environmental constraints) why

the Site could not be developed. The Site constitutes previously developed land in a sustainable location.

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

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

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

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

9.19 At the local level, regard has been had to the provisions contained within the adopted SBPB and the adopted Local Plan policy development allocation.

9.20 All aspects of the Site Allocation (Policy SA 24) are satisfied by the Proposed Development. Subsequent sections of this Statement (and other submitted documentation) explain in detail how the aims, objectives and requirements of the policy allocation would be delivered by the proposals. The table below summarises why the Proposed Development is acceptable in principle, against the various requirements of the site allocation (SA 24).

Policy element	Scheme response	Scheme acceptable in principle?
<p><i>“The Council will support the comprehensive redevelopment of this site”.</i></p>	<p>The proposal has been designed comprehensively as opposed to in a piecemeal format. The planning applications would be linked to ensure delivery of all aspects.</p>	<p>Yes</p>
<p><i>“An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake”.</i></p>	<p>The eastern portion of the Site (Development Area 1) contains a series of buildings which comprise a mix of uses at ground floor level. Flexible use floorspace is proposed for the majority of ground floor spaces to ensure a rich and vibrant mix. In addition, a wide mix of other employment-generating uses are proposed. Buildings are arranged around a new ‘High Street’ to ensure that the development delivers a new heart and centre for Mortlake.</p>	<p>Yes</p>
<p><i>“The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required”.</i></p>	<p>The proposal includes a new 6-form entry secondary school plus sixth form on site (Application B), designed to required standards and criteria, and with appropriate levels of indoor and outdoor play and sports provision. This element of the development would be delivered as an early phase to meet identified demand.</p>	<p>Yes</p>
<p><i>“Appropriate uses, in addition to educational, include”:</i></p>		

<p>Residential (including affordable housing)</p>	<p>The scheme proposes residential dwellings, a proportion of which would be designated affordable housing, subject to viability discussions.</p>	<p>Yes</p>
<p>Employment (E uses)</p>	<p>The scheme includes dedicated Class E(c) office employment use, plus flexible use floorspace (which allows for additional Class E(c) office use) and other employment generating floorspace.</p>	<p>Yes</p>
<p>Commercial such as retail and other employment generating uses</p>	<p>The scheme includes flexible use floorspace which includes provision for Class E(a) retail use, along with other employment generating uses such as Class E(a)(b), drinking establishment (sui generis) and F2 community use. In addition, other dedicated employment generating uses including cinema (sui generis) and hotel / public house with rooms.</p>	<p>Yes</p>
<p>Community and social infrastructure facilities</p>	<p>Class F2 use is included within the flexible floorspace applied for. It is envisaged that a local community rowing club would occupy the ground floor of block 9 and a shared community space, would occupy the ground floor of Building 5.</p>	<p>Yes</p>
<p>River-related users, sport and leisure uses</p>	<p>The proposals include a new 3G full size football pitch, indoor and outdoor sports and games areas (available for</p>	<p>Yes</p>

	shared community use), pubs and restaurants, cinema and boathouse for a community rowing club.	
“Retention and/or re-provision and upgrading of the playing field”.	The proposals include provision for a new floodlit 3G full size football pitch to enable a significant increase in sports use and sports benefits.	Yes
“The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside”.	<p>Significant areas of high quality open space and public realm are proposed as part of the development. Total overall green space proposed amounts to over 3 ha space, and total overall publicly accessible amenity and open space is almost 4 ha space.</p> <p>A series of key links through the Site are proposed which link the Site with Mortlake Green through to the River Thames. East-west links are proposed to integrate the Site with the existing surrounding streetscape and provide a new ‘High Street’. The landscape strategy for the development as a whole seeks to maximise pedestrian and cyclist permeability and legibility, both within and around the Site, and from the surrounding area.</p> <p>A large new publicly accessible green link is proposed providing a direct landscaped route from Mortlake Green to the river and new public plaza space.</p>	Yes

Table 6: Scheme Acceptability in Principle

9.21 The principle of the Proposed Development is therefore fully supported by national planning policies and guidance, at the strategic London-wide level, and in local policies, objectives and guidance. The Proposed Development would deliver the vision for the Site (as identified in the adopted SBPB) and the regeneration of Mortlake, through substantial housing delivery and sustainable mixed-use development.

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

9.22 The Site was sold by AB InBev in December 2015 as it was surplus to the company's requirements and brewing operations were winding down. The Site was purchased by Reselton Properties Limited. In 2017, a major programme of decommissioning works was undertaken on Site, completing in October 2017.

9.23 Both the SBPB and Site Allocation (Policy SA 24) confirm that a mixed-use scheme is acceptable at the Site and there is no requirement to re-provide an industrial use. Consequently, the redevelopment of the Site for non-industrial uses is accepted in planning policy.

9.24 Specifically, the SBPB acknowledges at paragraph 5.5 that the continued use of the Site for the brewery occupier is not viable in the long term and paragraph 5.10 sets out that **“large scale Class B2/B8 uses would not be appropriate on the site as demand is low locally and these would not maximise the opportunity for integration with the surrounding area and create a vibrant mix of uses reflecting the site's location”**. Generally, industrial uses are not considered suitable for inclusion in residential-led mixed use schemes.

9.25 The Proposed Development would deliver significant employment opportunities, far exceeding those provided when the Site was operated as a brewery. The employment benefits of the Proposed Development are discussed in detail in the 'Jobs and Employment' section of this Statement, the submitted Employment Assessment, prepared by Hatch and chapter 7 of the Environmental Statement (ES), also prepared by Hatch.

9.26 The loss of the existing playing pitches fully explained and justified within the context of the Proposed Development and the proposed delivery of improved sporting facilities within the masterplan. The submitted OSPPA, prepared by Gerald Eve LLP, assess this in greater detail.

- 9.27 The LBRuT Committee report in respect of the Original Applications, dated 12 January 2020, states that the proposed loss of industrial floorspace is **“deemed an acceptable approach in this instance given the allocation of the site in the Local Plan (SA24) and the adopted Planning Brief both accept the loss of this industrial site”** (paragraph 7.1.3).
- 9.28 The GLA’s Stage III report, also confirmed that the loss of the (former) existing use is acceptable stating **“the use of non-designated industrial land for the proposed mix of uses without the provision of replacement industrial capacity is in line with a Local Plan site allocation and other policies. Specifically Policy E7C(2) of the London Plan 2021, which supports mixed use developments on non-designated industrial sites which have been allocated for mixed use in a development plan”** (paragraph 188).

Interim Conclusion

- 9.29 There is no doubt that the principle of redeveloping the Site for the broad mix of uses proposed is fully supported by planning policy at all levels. There are no physical or environmental reasons that would prevent the Site being redeveloped (as demonstrated within the Applications).
- 9.30 The proposals would deliver the vision for the Site (as identified in the adopted SBPB and SA24) and would regenerate Mortlake, through substantial housing delivery and sustainable mixed-use development. The loss of the former industrial brewery use has been accepted, both at a strategic and local level, 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.
- 9.31 The principle of the proposal is supported by national planning policies and guidance, at the strategic London-wide level, and in local policies, objectives and guidance.
- 9.32 The principle of the Site’s redevelopment therefore fully complies with planning policy and should be supported and encouraged.

10 Proposed Land Uses

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

10.2 This section considers the following proposed land uses:

- a) Residential uses
 - i. Housing
 - ii. Affordable housing
- b) Town centre uses
 - i. Town Centre uses (assessment)
 - ii. Leisure
 - iii. Offices
 - iv. Retail
 - v. Hotel/pub with accommodation
- c) Social and community uses
 - i. School
 - ii. Other community uses

a) Residential Uses

Housing

Planning Policy

10.3 Planning policy at all levels supports the delivery of housing at the Site. The NPPF states at paragraph 120 (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**”. To boost housing supply, applications for housing should be considered against the presumption in favour of sustainable development (paragraph 11).

- 10.4 At a regional level, the principle of utilising brownfield sites for the delivery of housing is set out in the London Plan (Policy H1(2)). Increasing housing supply is one of the Mayor’s key strategic objectives. London Plan Policy H1 and table 4.1 support this, setting out ten year targets for net housing completions (2019/20 – 2028/29) for each Local Planning Authority (‘LPA’) to meet the total target for London of 522,870 homes. LBRuT’s minimum target is 4,110 new homes in the period. Development sites should optimise the delivery of housing, whilst giving due considerations to other factors affecting development density (Policy H1 B(2)(a)).
- 10.5 LBRuT Local Plan Policy LP 34 states that the Council would seek to exceed the minimum London Plan housing target set for the Borough. It is anticipated that East Sheen, Mortlake and Barnes Common and Barnes could deliver 400-500 units over the Local Plan period (2018 to 2033). The Policy LP 34 supporting text states that development proposals should optimise the potential of sites. The text also recognises that there is potential for housing development on existing employment land where the level of employment floorspace is retained or enhanced (paragraph 9.1.8). Local Plan Policy LP 35 sets out the desired housing mix. In Areas of Mixed Use (AMU’s) (where the Site is located) a higher proportion of small units would be appropriate (LP 35 (A)).
- 10.6 Providing a living community (including housing) is a key aspect of the vision for the Site, and the SBPB recognises that the scheme can provide a significant contribution to housing provision. Paragraph 5.22 of the SBPB notes that LBRuT will support a **“mixed tenure residential led mixed use development provided there is a range of other uses to create a vibrant Riverside area and associated employment and leisure opportunities”**. The Site Allocation (SA 24) echoes this and notes that the provision of residential uses (including affordable housing) will ensure that the new Mortlake village heart becomes a vibrant centre for new communities.

Assessment

- 10.7 The scheme would provide up to 1,085 residential units. 558 of these would come forward on the eastern portion of the Site (applied for in full detail), with up to 527 being delivered on the western portion of the Site (applied for in outline).
- 10.8 The residential units on the eastern side of the Site would largely be delivered above ground floor commercial uses, to help create an active and lively community on this portion of the Site. The west of the Site is residential in nature, residential accommodation would be provided in

all the proposed buildings (nos. 13, 14, 15 16, 17, 18 and 19), with up to 23 townhouses also provided along the north-western edge of the Site.

- 10.9 The Proposed Development would utilise a brownfield site to deliver housing, in line with national and regional planning policy.
- 10.10 Furthermore, the GLA found that the LBRuT is underperforming in its delivery of homes (Hearing Report, paragraph 197). The masterplan would deliver a significant amount of new housing across the Site, in line with LBRuT and GLA policy aspirations. The residential provision within the Proposed Development would represent a significant provision of housing in the plan period (up to 1,085 out of 4,110 homes) for LBRuT in the next ten-year period. This equates to a contribution up to 26.4% of the LBRuT’s target and would account for between two and three years of the annual delivery targets that the LBRuT have set for Barnes and Mortlake under Local Plan Policy LP 34.
- 10.11 The delivery of housing at the Site is also wholly supported in the adopted site allocation and the SBPB and is therefore considered acceptable.
- 10.12 **The Site is a brownfield site, and in line with national, London Plan and local policy aspirations, the Proposed Development would deliver 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.**
- 10.13 It is noteworthy that this assessment is supported by the LBRuT Committee report, which stated in relation to housing that **“the proposal is considered to make an efficient use of brownfield land”** (paragraph 7.1.53). This is supported in the GLA officer’s report which said (our emphasis) **“the proposals would contribute significantly to the London Plan housing and affordable housing targets, and Richmond’s annual housing and affordable housing delivery targets. The delivery of new market and affordable housing is strongly supported on the site and should be given significant weight in the determination of this application”.**

Affordable Housing

Planning Policy

- 10.14 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 60). 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 (paragraph 63(a)), and the agreed approach contributes to the objective of creating mixed and balanced communities (paragraph 63 (b)). 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 64).
- 10.15 The London Plan (2021) seeks to maximise affordable housing provision and Policy H4 sets a strategic target for 50% of all new homes to be delivered as genuinely affordable. 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.
- 10.16 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. Applications which follow the Viability Tested Route will normally be subject to late stage, and one or more additional review(s). The supporting text to Policy H5 (paragraph 4.5.15) sets out that schemes claiming the Vacant Building Credit (VBC) are not suitable to follow the Fast Track Route.

- 10.17 At a local level, on all former employment sites, the 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 paragraph 9.3.2 sets out that the VBC will not apply.
- 10.18 Paragraph 5.22 of the SBPB recognises that the amount of affordable housing on Site may be affected by the provision of a mix of uses, open space, community uses and restoration of historic buildings. Therefore, the amount of affordable housing that can be provided will be assessed on a case-by-case basis and subject to a detailed viability appraisal.

Assessment

- 10.19 The final level of affordable housing for the Scheme is the subject of ongoing viability discussions. However, for the purpose of assessing the scheme in terms of Environmental Impact, the scheme parameters have tested a maximum quantum of 22% affordable housing (by habitable room) based on an identified tenure split. This equates to up to 213 affordable units. The scheme is currently tested on the basis of 77% of units being provided as social rent and 23% as intermediate.
- 10.20 In line with policy requirements, a Financial Viability Assessment (FVA) has been prepared by BNP Paribas and submitted with the 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 consider financial viability in delivering affordable housing against policy targets.

Vacant Building Credit

- 10.21 VBC is a relevant consideration. The PPG (Planning Obligations section) is clear that it should apply when a vacant building is brought back into use or is to be demolished to be replaced by a new building. It should only not apply in certain circumstances:
- Where buildings have been abandoned;
 - Where buildings have been made vacant solely for the purposes of redevelopment; or

- Where buildings are covered by extant or recently expired planning permissions for similar development.
- 10.22 None of the above circumstances apply to the former Stag Brewery redevelopment proposals. The buildings have not been abandoned (they were still being used in October 2017), there are no extant or expired planning permissions, nor were the buildings deliberately made vacant for the purposes of redevelopment. In respect of this latter point, the position with regards to the closure of the brewery is clear. The former owner and occupier AB InBev took a business decision in 2009/2010 to close operations at the site and move their operations elsewhere. As a consequence of and response to that business decision, AB InBev and the LBRuT worked together to develop ideas, concepts and visions for the Site's redevelopment which culminated in the preparation and adoption of the 2011 SBPB. There can be no doubt, therefore, that the Site was vacated solely for the purpose of redevelopment.
- 10.23 Paragraph 9.3.2 of the LBRuT Local Plan refers to VBC and states:
- “In London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development, therefore the Vacant Building Credit will not apply. The mechanism for assessing the contributions from individual sites is set out in the Affordable Housing SPD, for each proposal to make an adequate contribution towards affordable housing which is directly, fairly and reasonably related in scale and kind to the development proposed.”**
- 10.24 As stated under the Original Applications, the Site was not vacated solely for the purposes of development and, as none of the other PPG 'exception' tests apply, it is appropriate to apply VBC. Using the example calculation at PPG, Planning Obligations, paragraph 027:
- Existing floorspace on Site to be demolished or re-used amounts to 35,402 sqm;
 - Total new residential floorspace proposed is up to 111,951 sqm;
 - Applying VBC deduction leaves residual residential floorspace of 76,549 sqm against which affordable housing policies apply;
 - LBRuT's normal affordable housing requirement of 50% reduces to 34.18% based on the above

Viability Position

- 10.25 The tenure mix of the affordable housing has been thoroughly tested by BNP Paribas in the submitted FVA. The following scenarios have been tested in terms of tenure mix (social rent: intermediate):
- i. 80:20;
 - ii. 50:50; and
 - iii. 20:80.
- 10.26 The viability assessment conducted demonstrates that the maximum reasonable affordable housing level to be delivered on site is up to 15% by units (up to 17% on habitable rooms). This is based on a 20:80 tenure split (social rent: intermediate). In real terms, this would lead to the delivery of up to 33 social rent units and up to 130 intermediate units, a significant contribution to the LBRuT stock. The precise quantum of affordable housing and the appropriate mix will be the subject of further discussions with the Council post submission.

b) Town Centre Uses

Town Centre Uses

Planning Policy

- 10.27 As set out in the NPPF (Annex 2: Glossary), town centre uses 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).
- 10.28 The NPPF stipulates that LPAs should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality (paragraph 86). Where town centre uses are proposed outside of town centres, a sequential test may apply (paragraph 87) or an impact assessment (paragraph 90). These tests will not apply where town centre development is in accordance with an up-to-date Local Plan.
- 10.29 The London Plan has a strong 'town centre first' policy (Policy SD 7 and paragraph 2.7.1) and accordingly directs retail, commercial, culture and leisure development to town centres in the

first instance before edge of centre sites are considered. Proposals for new, or extensions to, edge or out of centre development will be subject to an impact assessment. The Mayor's Town Centres SPG (2014) provides guidance on the implementation of the London Plan town centre policies.

- 10.30 At a local level, the Site is within the Mortlake Area of Mixed Use ('AMU') but is not within a designated town centre. The LBRuT Local Plan states that many local centres are defined as being within AMUs where a range of shops, and services and the provision of cultural and community facilities and places to meet, work and live are located.
- 10.31 Local Plan Policy LP 25 sets out the Borough's policy on development within centres as defined in the centre hierarchy. The Mortlake AMU is not within a designated centre but paragraph 7.1.17 of the Local Plan notes that Parts A and C of Policy LP 25 still apply. Part C states that "appropriate" uses include "new retail (including markets), business or employment developments, which maintain suitable provision for small businesses, and other uses, which primarily serve the needs of the local community or attract visitors and develop cultural opportunities". These uses are appropriate within AMUs. Town centre development outside AMU boundaries may be required to satisfy the sequential test.
- 10.32 One of the key elements of the SBPB and the Site Allocation is for the Site to provide a "new village heart and centre for Mortlake" and to achieve this objective, a range of uses will need to be provided in addition to residential uses. The SBPB encourages a mix of uses to generate vibrancy, including "restaurants, cafés, small retail spaces, community leisure uses, a museum, boat houses and other river-related uses/activities", along with business use floorspace. The Site Allocation states that "**employment (B uses), commercial such as retail and other employment generating uses**" will be supported.

Assessment

- 10.33 The masterplan proposes the introduction of the following town centre uses on the eastern site of the Site:
- A) 4,839 sqm (GIA) 'Flexible use' floorspace to allow for a mix of shops, restaurants, cafes, pubs and bars, offices, leisure and community spaces along the new High Street and the new riverside walk, as well as through the connecting routes;
 - B) 4,547sqm (GIA) office floorspace (Building 5 and Building 1);

- C) A new cinema, located on the corner of Lower Richmond Road and Sheen Lane (Building 1); and
- D) A new hotel/pub with accommodation (up to 15 beds) within the Former Hotel Building (Building 5).
- 10.34 As the Site is located within 160m (to the north) of the defined town centre boundary of East Sheen, in policy terms, it is to be regarded as an ‘edge of centre’ location. A Retail and Leisure Statement (RLS) has been prepared by RPS in support of Application A. The RLS sets out that because the Site has in principle support for retail and leisure given the adopted Site Allocation, a sequential or impact assessment for these uses is not required. Notwithstanding this, both have been prepared and RPS conclude that the proposed retail and leisure uses will have a positive beneficial effect on nearby retail centres and that the scale of retail and leisure proposes is in scale with the overall scheme and policy allocation.
- 10.35 **The Site is within an AMU, where town centre uses that serve primarily local needs will be considered acceptable. In addition, the Site is also subject to a Site Allocation which supports town centre uses, as does the SBPB. Therefore, the development of town centre uses as part of the wider masterplan is entirely appropriate in policy terms and will contribute towards meeting the stated aims and objectives of the SBPB.**
- 10.36 It is noted that the LBRuT officer’s report from the previous applications supported the mix of town centre uses proposed, recognising that they would provide “**a genuine mixed use development, creating opportunities for vibrant street frontages, green spaces, squares and public realm**” (paragraph 7.1.41).

Leisure

Planning Policy

- 10.37 London Plan Policies S1 and S5 state that developments which provide high quality, inclusive social infrastructure which addresses a local or strategic need, and which deliver sport and recreation facilities, should be supported. London Plan Policies SI14 and SI16 also support leisure uses involving the use and enjoyment of the River Thames.

- 10.38 With regard to evening economy uses, LBRuT Local Plan Policy LP 28 lends support for developments where social and community infrastructure is proposed, in line with the London Plan.
- 10.39 Local Plan Policy LP 18 expressly supports river activities, stating that developments which **‘incorporate uses that enable local communities and the public to enjoy the riverside, especially at ground level in buildings fronting the river’** will be supported. The Site Allocation and the SBPB also encourage river activities and uses.
- 10.40 The LBRuT Local Plan and the SBPB do not set out the quantum of leisure uses that would be required or supported at the Site.

Assessment

- 10.41 The masterplan proposes a new cinema in Building 1 and 4,839 sqm (GIA) of flexible commercial and leisure floorspace.
- 10.42 In line with national (NPPF paragraph 90), London Plan (Policy SD7) and Local Plan (Policy LP 25) planning policy, RPS have considered the impact of the retail and leisure changes on the vitality and viability of local town centres and their appropriateness in terms of scale. The RLS 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. The RLS also points to the fact that the Site is a preferred location for the development of leisure uses, and that the Site Allocation and SBPB encourage the provision of these uses.
- 10.43 The RLS provides a Cinema Assessment (from paragraph 8.59) and reviews the proposed cinema provision at the Site against existing cinema offers in the local area. The size and type of cinemas are assessed, and it is noted that there is in fact local demand for at least two additional cinema screens within the local area. This has little regard to the fact that London has the highest expenditure on cinema visitation of any UK region. It is concluded that the provision of a cinema as part of the masterplan will **“not have a significant adverse effect upon existing local cinemas or indeed town centres”** (RLS, paragraph 8.82).
- 10.44 It is therefore considered that the policy objectives to ensure the vitality and viability of town centres are satisfied and that the proposed leisure uses at the Site are acceptable in planning policy terms.

- 10.45 **The proposed cinema would have a positive and beneficial impact in the area, addressing an unmet demand. The cinema, along with other leisure uses has been assessed by RPS and found to have a positive and beneficial effect on local centres. Both uses would also help to deliver local employment.**
- 10.46 It is noteworthy that the LBRuT officer's report also recognised the benefits that the proposed cinema would provide to the Site and the surrounding area, stating that the proposed cinema has **"the ability to create a new market and generating more sustainable and local leisure activity, and the additional benefit of widening the leisure offer on site and contributing to the evening economy"** (paragraph 7.1.38). As such the introduction of a cinema at the Site is not considered to compromise the objectives of Local Plan Policy LP 28.

Offices

Planning Policy

- 10.47 The NPPF requires planning policies to deliver a strong, competitive economy where **"significant weight"** should be placed on the need to support economic growth and productivity (paragraph 81). The London Plan (Policies E1 and E2) support office developments in outer London.
- 10.48 Local Plan Policies LP 40 and 41 demonstrate that the LBRuT will encourage development proposals which support a diverse and strong local economy. LP 41 seeks to ensure that there is a range of office premises delivered in the borough, particularly for small and medium businesses with the borough's centres to enable them to grow and thrive. In line with Part D of this policy, all new office accommodation should be suitable to meet future needs, designed to be flexible and, where proposals are for more than 1,000sqm GIA, provide for affordable workspace. Supporting text paragraph 10.2.12 states that affordable floorspace should constitute at least 10% of the proposed office floor space and the workspace must remain affordable for a minimum of 10 years.
- 10.49 Specifically in relation to the Stag Brewery, the SBPB at paragraph 5.11 states that the Council would **"support office development as part of a mix of employment uses"** and that the **"scale should be limited and the Council will encourage the provision of smaller units where these meet modern business needs"**. Site Allocation (SA 24) recognises the Site's location within the Mortlake AMU and sets out the expectation that the Site will deliver **"a substantial mix of**

employment uses (B uses)” and that other uses generating employment will also be supported. Both the SBPB and the Site Allocation provide particular support for employment uses such as creative, scientific and environmental industries. Start-up units and lower cost units suitable for smaller businesses are also encouraged.

Assessment

- 10.50 The Proposed Development would deliver 4,547sqm standalone office (Class E) floorspace. Coupled with the minimum cap of 2,000 sqm in the flexible use area for offices, a minimum of 6,547 sqm office floorspace will be provided at the Site.
- 10.51 As set out within the submitted Employment Assessment, prepared by Hatch, the Council’s own employment study recognises that the Site could assist with delivering office stock in the Borough (Sites and Premises Study (2017 update)). The Study concludes that redevelopment within existing defined Key Office Areas in the Borough is unlikely to sufficiently meet additional office floorspace demand and as a result, consideration should be given to accommodating office floorspace elsewhere within the Borough or in the Functional Economic Market Area. The Site is identified as one of two sites within the Borough with potential to provide a substantial amount of net additional employment floorspace (albeit with poorer accessibility than the other site at Richmond).
- 10.52 The office space provided within the Proposed Development will be designed to be flexible and adaptable, suitable for a range of uses and provision of co-working and will be provided in Building 5 and the upper level of the cinema building (Building 1). In line with LBRuT Local Plan Policy LP 41 and London Plan Policy E3, 10% of the office space will be provided as affordable workspace. The location of the affordable workspace would be confirmed post-determination of the planning application.
- 10.53 **The proposed office floorspace is in line with policy aspirations to deliver employment generating uses on the Site and deliver a strong, competitive economy. The proposed office provision at the Site is acceptable in planning policy terms.**
- 10.54 LBRuT officers welcomed the provision of employment space proposed under the Original Applications. The LBRuT Committee Report confirmed that the proposed office floorspace would respond to the aspirations of the Brief and planning policies and that it had the potential to deliver **“significant indirect benefits such as expenditure from employees)”** (paragraph

7.1.50). The GLA's Hearing Report stated that the proposed offices uses were "**consistent with local and strategic policy directions regarding appropriate land uses for the redevelopment of the Site, and as such are supported**" (paragraph 235).

Retail

Planning Policy

- 10.55 Policy E9 states that the Mayor will, and Boroughs and other stakeholders should support a successful, competitive and diverse retail sector.
- 10.56 At a local level, Policy LP 25 (Part A) states that retail will be acceptable in AMUs, subject to other policy considerations. Part C of Policy LP 25, which applies to the Mortlake AMU, recognises that retail can be an appropriate use.
- 10.57 The Site Allocation specifically states that appropriate uses on the Site include retail.
- 10.58 The SBPB also recognises the role that retail/restaurant/café/bar uses can play in encouraging more activity on the Site. In line with local town centre policy, the SBPB states that any retail uses should be "**small scale**", "**ancillary to the uses on site to serve local needs**" and that the area should "**not be considered as a retail destination in its own right**" (paragraph 5.14). The retail uses should not compete with nearby retail centres. Neither the Site Allocation nor the SBPB provide any guidance or floorspace limits (minimum or maximum) for retail.

Assessment

- 10.59 Retail (Classes E and Sui Generis drinking establishments/bars) is encouraged on Site as part of the wider masterplan, in order to develop a vibrant living quarter for Mortlake. The scheme proposes a range of flexible use with suggested caps to ensure a true mix of uses comes forward to achieve this aim.
- 10.60 The masterplan proposes flexible floorspace at the lower levels of a number of buildings within Development Area 1 that could include a mix of retail floorspace (Classes E and Sui Generis). This flexible use floorspace would consist of a maximum of 2,200 sqm Class E retail, 220 sqm Class E financial and professional services, 2,400 sqm Class E café/restaurants and 1,800 sqm sui generis drinking establishments/bars. There would also be a minimum provision of Class E retail within the new 'High Street Zone' (see plan ref. C645_Z1_P_00_001 Rev C, as included at

Appendix A). Section 4 of this Town Planning Statement provides further details on the proposed flexible use floorspace. The suggested flexible use floor area parameters should ensure a good mix of retail uses across the Site to help deliver a vibrant recreational quarter.

- 10.61 The submitted RLS, prepared by RPS, has considered the scale of retail proposed in the context of surrounding retail centres and the planning policy position. The RLS concludes that the retail proposed will only serve local needs which will be newly created by the wider masterplan, which has policy support. To put the proposed retail floorspace into perspective, a total of 2,839sqm (GIA) retail floorspace (Classes E and Sui Generis bar) could be brought forward (maximum) (accounting for the minimum 2,000sqm (GIA) of office floorspace), compared with 34,900 sqm existing within East Sheen. This represents only 8% of East Sheen's centre.
- 10.62 The scale of retail is appropriate for the wider masterplan and will serve newly created local needs. RPS consider that the nature of the retail and leisure space mean that they are unlikely to divert trade away from any other centre and they will primarily serve the new residential population generated by the Proposed Development. This is in line with the role of AMUs, as defined by the Glossary of the LBRuT's Local Plan and set out within Local Plan Policy LP 25 and the Site Allocation (SA 24) supporting wording, and is therefore an acceptable scale.
- 10.63 With regard to the health of the surrounding centres, the RLS clearly demonstrates that these are all relatively 'healthy' in retail planning terms and finds that the proposed flexible retail and leisure floorspace will complement these centres. Due to the very low levels of vacancy, RPS conclude that even if the sequential test were to apply in this instance, there are no sequentially preferable sites, suitable and available to accommodate the application proposals.
- 10.64 In terms of impact, RPS consider the impact of the proposed retail and leisure offer upon East Sheen District Centre, Barnes Local Centre, Kew Gardens Station Local Centre and White Hart Lane Neighbourhood Centre. It is concluded that the centres' health and the proposed quantum and type of retail and leisure proposed at the Site would not have an adverse effect on existing retail centres.
- 10.65 **Retail sequential and impact tests have been undertaken by RPS who conclude that the proposed retail uses would have a positive and beneficial effect on local centres and would complement existing provision found within the local area, rather than compete.**

10.66 The LBRuT Committee Report (dated 29 January 2020) found that the quantum of retail floorspace proposed was **“acceptable and will not result in an unacceptable adverse impact on the viability and vitality of nearby centres, will not result in unacceptable trade draw to local centres and will serve the day to day needs of the sites occupants”** (paragraph 7.1.41). This demonstrates clear support from LBRuT that the Site can support the variety and make-up of the proposed commercial uses.

Hotel / Pub with Accommodation

Planning Policy

10.67 Policy E10 of the London Plan supports the expansion of London’s visitor economy, seeking improvement to the capacity, range and quality of visitor infrastructure. Policy E10 stipulates that in outer London, and those parts of inner London outside the Central Activities Zone, serviced accommodation should be promoted in Town Centres and within Opportunity Areas.

10.68 Local Plan Policy LP 43 encourages an increase in hotel bedspaces, subject to other Local Plan considerations (including location in accordance with Policy LP 25). A range of visitor accommodation will be encouraged and local policy also seeks for new accommodation to be accessible for all. Policy LP 43 stresses the importance of proposals for visitor accommodation being considered in respect of impact on amenity, living conditions, parking, servicing and transport.

Assessment

10.69 It is proposed to provide a small ‘pub with rooms’/hotel within part of the Former Hotel Building (block 5) in the south eastern portion of the Site to provide up to 15 hotel rooms. This would bring the Former Hotel Building back into its original use.

10.70 The Local Plan notes that the 2012 Hotel Study identified a need for the delivery of 900 hotel bedrooms in the LBRuT by 2026. Between April 2009 and April 2012, 113 hotel bedrooms were delivered across the Borough (as noted in the 2012-2013 Annual Monitoring Report, which is the most recent data available on LBRuT’s website). If this rate of delivery is applied from 2012 to present day (to the end of 2021) then a maximum of 339 bedrooms out of the 900 required may have been delivered. Therefore, it is considered that there is a demand for the delivery of at least 561 hotel bedrooms in the Borough.

- 10.71 Although the Site falls outside the five designated main centres identified by the LBRuT Local Plan for major hotel development in the first instance, it is contained in the Mortlake AMU, which local policy considers appropriate for a range of town centre uses. At up to 15 bedrooms in capacity, the scale of proposed pub-hotel accommodation is not considered to be comparable to ‘major new hotel development’, and instead represents small scale visitor accommodation at a local scale. In this respect it is noted that Site Allocation SA24 and the SBPB seek to create a new ‘village heart’ for Mortlake. The proposed small-scale hotel use is located amongst, and considered complementary to, the mix of flexible retail, leisure and employment generating uses proposed in the eastern portion of the main application site.
- 10.72 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.
- 10.73 **Therefore it has been demonstrated that hotel use is supported in planning policy and is wholly appropriate for the Site.**
- 10.74 Additionally, as noted in the LBRuT report for Planning Committee in respect of the Original Applications, 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”** (paragraph 7.1.92).

c) **Social and Community Uses**

Planning Policy

- 10.75 The NPPF advocates for development to create **“strong, vibrant and healthy communities”** which provide high quality environments with adequate housing supply and accessible local services that reflect community need (paragraph 8(b)).
- 10.76 The London Plan also places a strong emphasis on delivering additional and enhanced social infrastructure to meet the needs of London, with Policies S1 and S5 supporting proposals which provide high quality social infrastructure in light of strategic and local need. Supporting paragraph 5.1.1 sets out that social infrastructure includes health, educational, community, cultural, play and sport, spiritual and community safety facilities. The Policy recognises that

social infrastructure plays an important role in developing “**strong and inclusive communities**” (paragraph 5.1.2). Where new social and community uses are provided, these should be accessible for all and in locations that are easily accessed by public transport. Where possible, the extension of new social uses to serve the wider community will be encouraged.

- 10.77 London Plan Policy S6 states that public toilets should be delivered in major development proposals.
- 10.78 Local policy also sets out that new social and community infrastructure will be supported (Policy LP 28) with detailed policies going on to state that this support will be where it responds to local need, is of a high-quality design and accessible for all, is in a sustainable location and considers impact on transport and local character and amenity (Local Plan Policy LP 28). In line with the London Plan, the provision of services which can be extended to other areas of the community, through the provision of multi-use, flexible and adaptable buildings or co-located services will be encouraged.
- 10.79 Both the SBPB and the Site Allocation identify that the redevelopment of the Site should provide a mix of vibrant uses, which includes social infrastructure and community uses, including leisure and sport and health uses.

Assessment

- 10.80 The scheme would deliver a range of social and community uses, including a school, sports facilities, community spaces and open green space. These facilities are being provided in response to local needs and are therefore supported at all levels of planning policy.
- 10.81 In respect of Policy S6, at this stage, the proposals do not provide public toilets. It is acknowledged that this is contrary to London Plan policy, however the potential for providing public toilets within the site could be explored by the Applicant at a later date.

School

Planning Policy

- 10.82 The NPPF sets out at paragraph 95 that LPAs should take a “**proactive, positive and collaborative approach**” to meeting the need for school places and to development that will assist in widening the choice in education.

- 10.83 London Plan Policy S3 seeks to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice. Boroughs should ensure development plans are informed by a needs assessment of education and childcare facilities, identify suitable sites for future provision through the development plan process (particularly in areas with significant planned growth), and ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools. Part B of the policy states that development proposals for educational facilities should be located in areas of identified need, in accessible locations and to be designed in ways that minimise health impacts and support active lifestyles for children. Additionally, the Mayor’s Social Infrastructure SPG states that new sites for schools should be secured to meet additional educational need.
- 10.84 At a local level, Local Plan Policy LP 29(A)(1) supports the development of new secondary schools where these meet local need, with paragraph 8.2.3 setting out that “**priority will be given**” for these education facilities. Again, the Policy encourages the multi-use of schools by local community groups and the Council will seek to ensure this extended use through appropriate measures, including Community Use Agreements.
- 10.85 Paragraph 8.2.11 of the Local Plan states that adequately sized sites for new schools within the borough areas where additional student places are needed are extremely rare and identifies the application site as one of four sites specifically identified for the provision of new educational uses for the purposes of the Local Plan. This paragraph, and Site Allocation (SA 24) both indicate that redevelopment of the application site must include a new 6-form entry secondary school, including sixth form.
- 10.86 The SBPB identifies a need for the Site to deliver a two-form entry primary school (paragraph 5.20). On 15 October 2015, a report was presented to LBRuT’s Cabinet which sought approval from Members to change the education requirement at the Site from a primary school to a secondary school. The report was accompanied by an update to the School Place Planning Strategy, which identified the new requirement for a sixth form entry secondary school, plus sixth form, at the Site. More recently, the 2019 update to the School Place Planning Strategy¹ has continued to identify a need for a secondary school in LBRuT. Paragraph 4.18 of this report

¹ [LONDON BOROUGH OF RICHMOND UPON THAMES](#)

specifically refers to the Site as being able to provide a school to directly address this identified need. This requirement has translated into the Local Plan Site Allocation (Policy SA 24) which sets out the Council's aspiration for the school at the Site.

Assessment

- 10.87 The masterplan would deliver a new six form entry secondary school with sixth form on the eastern side of the Site.
- 10.88 Hatch have reviewed the need for a school in this location within the submitted Community and Cultural Assessment. Their report states that existing primary education in the area has capacity which could absorb the additional demand created by the Proposed Development. In terms of secondary education, paragraph 2.21 of the report states that LBRuT would be '**unable to meet its statutory duty to provide places... unless a new school was provided**'.
- 10.89 The Applicant's architects (Squire & Partners) have designed the school. The land for the school and play facilities would be transferred to the LBRuT. The LBRuT would co-ordinate occupation of the school to best meet local demand – it is likely that this would be in conjunction with the ESFA.
- 10.90 The school would provide play facilities at roof level, an indoor sports hall, a MUGA as well as a full sized artificial all weather playing pitch with spectator facilities. Floodlighting for the proposed playing pitch would also be provided. Further details on the proposed play facilities can be found within the submitted Open Space and Playing Pitches Assessment, prepared by Gerald Eve LLP and enclosed appendices.
- 10.91 **In line with the Site Allocation, the scheme would deliver a new sixth form entry secondary school which includes a new sixth form for 1,200 students. Delivering a new school which meets local need is strongly supported by the NPPF, the London Plan (Policy S3) and LBRuT's Local Plan (Policy LP 29 and Site Allocation Policy SA 24).**
- 10.92 **In line with aspirations of the London Plan (Policy S3) and LBRuT (Policies LP 28 and LP 29), the external play pitch, indoor sports hall and MUGA would be available for community use out of school hours. The Applicant and the ESFA have committed to a Community Use Agreement which would enable local groups, teams, clubs, organisations and bodies the opportunity to use these facilities.**

10.93 The LBRuT officer’s report reflects this assessment, stating that the proposed school is **“wholly supported”**, in line with all relevant planning policies and will **“benefit the wider community and optimise the use of the land”** (paragraph 7.1.133). The GLA Hearing Report echoes the conclusions of the LBRuT and that of the Applicant’s submitted evidence for the school, finding that the proposed school **“is strongly supported and is considered to be in accordable with national, London-wide and local planning policy”** (paragraph 250).

Other Community Uses

Assessment

10.94 As part of the overall flexible use area, the ground floors of Buildings 5 and 9 are anticipated to come forward for Class F2 community use as part of the flexible mix. Both buildings are on the eastern side of the Site and are applied for in detailed. At this stage, operators have not yet been identified but it is anticipated that Building 9 would accommodate a boathouse facility for a local rowing club and that Building 5 would provide flexible space for local community groups to use and hold events by agreement.

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

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

11 Jobs and Employment

11.1 The Proposed Development would deliver a wide range of jobs and employment opportunities in a range of sectors and of different types. Currently, the Site provides extremely limited employment, whereas the proposed masterplan would deliver a significant number of jobs during construction and once the development is occupied. This would contribute to increasing Borough employment numbers and creating a new heart for Mortlake.

Planning Policy

11.2 The NPPF sets out the need to balance economic objectives as part of sustainable development (paragraph 8(a)). The London Plan acknowledges the strategic importance of conserving and enhancing London's global economic competitiveness partly through the diversification of the economy (Policy GG5). Also, London Plan Policy E11 states that strategic development proposals should support local employment, skills development and training opportunities.

11.3 LBRuT's Local Plan promotes a strong and diverse local economy (Policy LP 40). The Local Plan Site Allocation requires the Site to provide employment (Class E uses), with other employment generating uses to be supported. LBRuT Local Plan Policy LP 29 requires Local Employment Agreements to be secured through a Section 106 Agreement for developments which will generate more than 20 FTE jobs.

11.4 It is a key aspiration of the SBPB that the Site should deliver a mix of uses including a **"substantial mix of employment uses (B uses)"** as well as **"other employment generating uses"**.

Assessment

11.5 The Proposed Development would 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.

11.6 Hatch Consulting has assessed the scheme in their Employment Assessment and Socio-economics chapter of the ES. The Scheme will:

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

11.7 The Employment Assessment also notes the positive employment impacts of the Proposed Development in terms of construction and increased expenditure to help support local retail and service businesses (Section 5).

11.8 Once operational, the Proposed Development would provide significantly more employment opportunities than the existing Site. The Hatch report states that a net total of 326 FTEs will be created on the Site as a result of the Proposed Development. This represents an increase of 141 FTEs from the former existing use.

11.9 In line with London Plan Policy E11 and Local Plan Policy LP 29, the Applicant agrees to a Local Employment Agreement which will 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, 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.

- 11.10 **It has been demonstrated that the Proposed Development will generate a significant level of employment both in terms of number, type and variety of jobs. This far exceeds the former brewery use and the existing situation. The Proposed Development therefore fully complies with national and strategic policy and is in line with local policy aspirations for the Site which seek to ensure that new development provides employment opportunities and economic benefits.**

12 Residential Design

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

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

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

12.2 It should be noted that detailed illustrative residential layouts have been submitted for Development Area 1 (applied for in detail). The residential units within Development Area 2 are applied for in outline, and the layout detail will be submitted for approval at Reserved Matters stage. A Design Code, prepared by Squire & Partners, which sets out the rules and guidance that future Reserved Matters submissions should adhere to for these units has been submitted in support of this application.

a) Residential Density

Planning Policy

12.3 At a national level, the NPPF states that planning policy should ensure that developments **“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” (NPPF, paragraph 130(e)). 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 130(c)).

- 12.4 London Plan Policy D2 states that the density of development proposals should: (1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels and (2) be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).
- 12.5 Policy D3 states that optimising site capacity must take a design-led approach. 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. Density should be considered in respect of i) form and layout, ii) experience and iii) quality and character.
- 12.6 Policy D4 of the same Plan states Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making (Part A) and that design should be thoroughly scrutinised by LPAs should they meet the criteria set out in Part D.
- 12.7 The higher the density of a development, the greater the level of design scrutiny that is necessary, particularly qualitative aspects of the design, as described in London Plan Policies D4 and D2. Policy D4 states that proposals with a density of over 350 units per hectare or that include a tall building (as defined by the Borough, or above 30 metres), should be subject to a greater level of design scrutiny.
- 12.8 Local planning policy does not dictate required density levels for the Site, instead Local Plan Policy LP 34 states that the Council will encourage higher density development in more sustainable locations.
- 12.9 There are no site-specific policies setting development density levels within the London Plan, LBRuT planning policies, the SBPB or the Site Allocation. Local Plan Policies LP1 and LP2 set that the LBRuT will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough’s valued townscapes and

landscapes, through appropriate building heights and high architectural and urban design quality.

- 12.10 In summary, planning policies and guidance encourage and support higher density development through a design-led approach in locations such as the Site.

Assessment

- 12.11 The masterplan proposes up to a total of 1,085 residential units across the development. This comprises 558 in Development Area 1, and up to a maximum of 527 on Development Area 2.

- 12.12 The resulting residential density across the Site is the by-product of these two driving scheme aspirations:

a) To optimise housing delivery on Site, in line with national, regional and local planning policy aims to boost housing supply as well as to deliver the critical mass required to achieve the SBPB and Site Allocation aims for the Site; and

b) To develop a well-designed scheme which responds to the local townscape and context and which provides good quality homes with suitable amenity space and open spaces.

- 12.13 The Proposed Development has evolved through a design-led approach, in line with London Plan Policy D3, and the architects have worked closely with statutory consultees to develop a scheme which optimises site capacity and is appropriate for the local context. The Proposed Development responds to planning objectives as set out as below. In doing so, the resulting residential density of the scheme can be considered wholly appropriate:

a) *Townscape, design and local context* – the proposed built form has been sensitively designed and thoroughly scrutinised. It is considered that the proposed design is appropriate for, and contributes to, the local context. The Proposed Development has taken a considered approach to height and re-configuring building layouts in order to deliver housing whilst also respecting the setting of BTMs, listed buildings and the Thames river frontage at the Site. It is considered that the resulting scheme positively responds to the local context in design terms. Further details can be found within Sections 13 and 16 of this Statement and within the submitted DAS and ES Chapters 15 and 16.

During the pre-application period, heights have been re-distributed and, in most areas, increased across the Site 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.

b) *Amenity* – the scheme has been designed with due consideration to impacts on amenity for existing surrounding and residents, as well as new residents. Further details can be found within Section 18 of this Statement, the DAS and the ES.

c) *Open Space* – the scheme will provide a significant amount of new open space, including extensive publicly accessible green space, plus hard landscaped areas and children's playspace, for use by the new residents as well as the wider local community. The Proposed Development provides approximately 4.83ha (including towpath) / 4.54ha (excluding towpath) of publicly accessible amenity open space. This is compared with 0 sqm of publicly accessible open space on the 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 a variety of open spaces, providing access throughout the Site and to the river.

The Proposed Development also proposes playspace which is in excess of the GLA requirements (using the GLA 2019 Population Yield Calculator). Further details can be found within Section 14 of this Statement, the submitted Landscape DAS, prepared by Gillespies and the submitted OSPPA, prepared by Gerald Eve LLP.

d) *Sustainable Travel* – the scheme has been designed to encourage pedestrian and cycle movement wherever possible and to improve access and routes to, from and across the Site. An appropriate level of car parking would be provided, and associated highways works are proposed which would mitigate any impact on the local highway network. The Proposed Development encourages and facilitates active travel, with cycle parking being provided in line with London Plan standards, and appropriate pedestrian routes provided throughout the Site. The Proposed Development also reduces the number of car parking spaces on Site compared with the applications resolved to approve by LBRuT (ref: 18/0547/FUL and 18/0548/FUL), thereby representing an improvement in terms of facilitating active travel.

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

The Proposed Development considers the servicing and maintenance of buildings and the public realm. In terms of impact on the road network, the vehicular trip generation figures for the Proposed Development would be lower than the previous applications. This is driven in part, by a reduction in the number of residential units proposed in comparison to the GLA Refused Application A and in part by the reduction in the size of the western basement when compared to the LBRuT scheme (See Appendix D).

Further details can be found within section 15 of this Town Planning Statement and the submitted Transport Assessment and highway drawings, prepared by Stantec.

e) Social infrastructure – the scheme would deliver a significant amount of social infrastructure, to the benefit of the new and existing communities. This includes the new secondary school with associated sports facilities (open to use by the public via a Community Use Agreement), community use spaces as well as the new high street uses (convenience, leisure and employment opportunities) and open spaces which would foster community links. Further details can be found within sections 10 and 14 of this Statement and the submitted DAS, prepared by Squire & Partners, the Community and Cultural Uses Assessment, prepared by Hatch, the Landscape DAS, prepared by Gillespies and the OSPPA, prepared by Gerald Eve LLP.

f) Residential Quality – The Proposed Development would 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. Minimising the number of single aspect and north facing single aspect units in the scheme has also been a key design consideration.

g) Sustainability – The Proposed Development targets high sustainability standards.

h) Unit mix – As set out within the Accommodation Schedule, prepared by Squire & Partners (Rev I), the Proposed Development proposes a unit mix where 21% of the

proposed units are smaller units, appropriate for the Site's location within the Mortlake AMU.

i) Removal of non-residential uses – The Proposed Development excludes the care home (Buildings 14 and 15) and the gym (Building 5) uses that were originally proposed under the LBRuT scheme. This has enabled more residential units to be delivered.

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

12.15 **It is therefore considered that the density of the Proposed Development is appropriate for the context. The scheme therefore optimises the capacity of the Site and should be considered acceptable in this regard.**

b) Unit Mix

Planning Policy

12.16 Developments should provide a range of housing sizes, taking into account local need (London Plan Policy H10). 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”**. The supporting text of Policy LP35 goes on to state, when referencing the needs of the LBRuT's future population, that **‘there are an increasing proportion of one person households and on appropriate sites an element of small units (1 bedroom or studios) will also be required’** (paragraph 9.2.1).

Assessment

12.17 The indicative residential mix for Development Area 1 is set out below:

Unit Type	Studio	1-bed	2-bed (family)	3-bed	4-bed	Total
Number	0	116	295	140	7	558
% of total	0	21	53	25	1	100
	Family sized accommodation (2 bed family, 3 bed and 4 bed units) as a % of total proposed					79%

Table 7: Proposed unit mix for Development Area 1 (East of Ship Lane – Detailed Application) (Squire & Partners, Rev I)

12.18 Table 7 demonstrates that Development Area 1 will provide a significant amount of family sized accommodation (79%). An appropriate amount of smaller housing is also proposed. This is acceptable given the Site’s location within an AMU and is supported by Local Plan Policy LP 35 and paragraph 9.2.1 of the Local Plan.

12.19 The affordable housing is proposed to be of the following mix:

Unit Type	Rent	Intermediate
1-bed	7%	56%
2-bed	38%	44%
3-bed	51%	0%
4-bed	4%	0%

Table 8: Affordable housing mix (Squire & Partners, Rev I)

12.20 An Affordable Housing Statement, prepared by Gerald Eve LLP has also been submitted in support of the Applications. The statement sets out the need for affordable housing in LBRuT and presents the affordable housing products proposed.

- 12.21 As set out within this section of this Statement, and in other submission documents, the residential units would provide a range of housing size options for new residents. Encouraging this mixed community is in line with the aspirations of the SBPB to create a 'village heart'.
- 12.22 It is considered that the Proposed Development complies with relevant planning policy in terms of unit mix. Based on the indicative mix, 79% 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 appropriate.
- 12.23 **The proposed residential mix would provide a mix of unit sizes which would help to create a vibrant new community within Mortlake. The confirmed mix for Development Area 1 would deliver a significant amount of family sized housing (79%) alongside smaller accommodation (21%). This mix is acceptable in line with the Site's location within an AMU (Local Policy LP 35).**

c. Housing Quality / Design Standards

i. Housing Quality / Design Standards

Planning Policy

- 12.24 London Plan seeks to deliver housing developments of the highest quality. Policy D5 requires accessible and inclusive design, and sets out detailed design requirements, with residential developments required to meet the minimum standards set out in part F of the policy and Table 3.1 of the Plan. Many of these requirements build upon the Mayor's Housing SPG (March 2016).
- 12.25 LBRuT's Local Plan Policy LP 8 and LBRuT's Residential Design Standards SPD (March 2010) set out the Council's design standards for new developments to secure good amenity and living conditions for new and existing occupants.

Assessment

- 12.26 The Proposed Development has been designed in line with relevant national, Mayoral and LBRuT housing standards.

12.27 The submitted DAS provides an assessment of the proposed residential units against the Mayor's Housing SPG (2016) and London Plan Policy D6. A high-level assessment against the key residential design policy requirements is set out in the section below.

ii. Unit size

Planning Policy

12.28 Minimum space standards for residential units are set out within the Nationally Described Space Standards (2015). London Plan Policy D6(F) and the Mayor's Housing SPG (Standard 24) are clear that these floorspaces are minimum standards.

12.29 Developers are encouraged to exceed these standards to deliver good quality housing (Mayor's Housing SPG at paragraph 2.3.25, and London Plan at paragraph 3.6.2). Paragraph 3.6.2 of the 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"**.

12.30 Balanced against the need to deliver good quality new housing, the 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 the policy intent is to make efficient use of land and maximise housing delivery.

12.31 LBRuT Local Plan Policy LP 35(B) requires all new housing to comply with the Nationally Described Space Standard.

Assessment

12.32 All the new homes proposed would meet the Nationally Described Space Standards, in line with LBRuT and GLA planning policy requirements. All units are proposed to be provided with in-built storage in line with standards. The units would also meet the design standards set out in the Mayor's Housing SPG in terms of room dimensions / areas and layout of rooms. All units would benefit from good floor to ceiling heights.

12.33 Where appropriate and, as encouraged by the Mayor, residential units would exceed these minimum standards.

12.34 For the units proposed applied for in outline, the Design Code includes a schedule of units sizes, presenting a range (parameters) of sizes per unit type. The minimum size complies with the national space standards. The maximum size shown does not exceed 10% above the minimum space standard to give comfort that units will not be oversized. Individual unit sizes will be confirmed at the Reserved Matters stage following the detailed design exercise.

12.35 Therefore it has been demonstrated that the Proposed Development will deliver high quality living environments for future residents in terms of unit size.

iii Accessibility

12.36 In accordance with London Plan (Policy D7) and LBRuT Local Plan Policy LP 35, at least 10% of the proposed residential units would be designed to be wheelchair user units (i.e. in line with part M4(3) of the Building Regulations). The remainder of units would be built to M4(2) standards, i.e. wheelchair accessible and adaptable. These units have been designed for the detailed residential elements within Development Area 1 and are shown on the submitted drawings.

12.37 Entrances, access to refuse stores and relationship to car parking (where relevant) have been designed to provide inclusive access.

12.38 The Design Code for the residential units applied for in outline includes a mandatory requirement to provide the residential units as easily adapted for compliance with wheelchair housing design standards and they must have level thresholds to provide inclusive access.

12.39 **The residential units would provide wheelchair access, with at least 10% of the proposed residential units within Development Area 1 to be wheelchair units, in line with policy requirements. The residential units coming applied for in outline must also provide for wheelchair accessibility, in line with housing design standards.**

iv Amenity Space

Policy

12.40 Both the London Plan and LBRuT's planning policies and guidance require the provision of adequate amenity space for new residential units. The Mayor's Housing SPG states that a minimum of 5 sqm private outdoor space should be provided for 1-2 person dwellings

and an extra 1 sqm should be provided for each additional occupant (Standard 26). The minimum depth and width for all balconies and other private external spaces should be 1,500mm (Standard 27).

- 12.41 LBRuT Policy LP 35 (D) sets out (parts a-e) what design standards amenity space for all new dwellings should achieve.

Assessment

- 12.42 The residential units within Development Area 1 are coming forward in full detail and the amenity space has been confirmed. Private amenity space is provided, in line with the standards set out in the Mayor's Housing SPG and London Plan Policy D6, in the form of balconies at upper levels of buildings and private garden areas at ground floor level. The balconies and garden areas all have a minimum depth of 1,500mm to ensure that wheelchair access is possible, in line with the Mayor's Housing SPG.
- 12.43 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.
- 12.44 The residential within Development Area 2 is applied for in outline and as such, the detailed amenity space provision cannot be confirmed at this stage and will be developed during the detailed design stage. The Design Code includes a mandatory requirement for balconies to provide the minimum amount of amenity space required. All units would, however, provide adequate amenity space which will meet the minimum requirements. In particular, the new townhouses within blocks 20 and 21 would provide privately accessible gardens.
- 12.45 **Appropriate amenity space would be provided for all new residential units, in line with Mayoral design standards.**

v Aspect and Privacy

Planning Policy

12.46 The London Plan (2021) aims to deliver housing of high quality. Policy D6 sets out detailed design requirements. Part (C) states that housing development should “normally avoid the provision of single aspect units” unless where it is considered a more appropriate design solution to meet the requirements of part (B) of Policy D3 (Optimising site capacity) than a dual aspect dwelling.

12.47 Part B of Policy D3 states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities.

12.48 Policy D2 Part A states that:

The density of development proposals should:

- 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels
- 2) be proportionate to the Site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).

12.49 Where it can be argued that a development proposal does accord with the above, it also needs to be demonstrated that the residential units will be adequate in terms of:

- a) Passive ventilation;
- b) Daylight and privacy;
- c) Avoiding overheating.

12.50 Policy LP8 in the London Borough of Richmond’s (LBRuT) Local Plan (2018) states that all development must protect the amenity and living conditions for new and existing residents.

- 12.51 Supplementary planning policy guidance for the London Plan is set out in the Housing SPG (2016).
- 12.52 Standard 29 of the GLA's adopted Housing SPG (March 2016) states that developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, exposed to noise levels detrimental to quality of life or which contain three or more bedrooms **"should be avoided"**.
- 12.53 Supporting paragraph 2.3.39 goes on to state that single aspect dwellings come with a concern of overheating due to difficulties in ventilation and makes clear that single aspect dwellings should be avoided **"wherever possible"**. The paragraph does state however that the application of this standard should consider other planning and design objectives for a site, for example the aim to maximise active frontage and minimise inactive frontages.
- 12.54 Paragraph 2.3.40 continues stating that **"good single aspect one and two bedroom homes are possible"** in the instances where limited numbers of rooms are required, the frontage is generous, the plan is shallow, the orientation and or outlook is favourable, and care is taken to mitigate the potential for overheating without the need for mechanical cooling.
- 12.55 Paragraph 2.3.41 reiterates that adequate natural ventilation of single aspect dwellings is difficult to achieve. Single aspect dwellings at ground floor level also require consideration to maintain privacy and adequate levels of sunlight.
- 12.56 LBRuT's Residential Development Standards Supplementary Planning Document (2010) sets out at paragraph 4.2.12 that over intensification of a site through new residential development is often indicated in several ways including **"solely north facing single aspects"**. Paragraph 5.1.3 of the same document states that **"dual aspect dwellings in flats should be created wherever possible"**.
- 12.57 The emerging Good Quality Homes for All Londoners guidance (February 2022) has not been adopted and therefore does not carry the full weight of adopted policy.
- 12.58 The draft reiterates at C4.1 (Module C) that all new dwellings should be dual aspect unless there are **"exceptional circumstances"** make this impractical or undesirable.
- 12.59 Single aspect units should be restricted to one or two bedspaces and should not face north.

- 12.60 Where single aspect units are justified, it must be demonstrated that they achieve good levels of ventilation, daylight, privacy and thermal comfort for (particularly relevant for south or west facing single aspect units).
- 12.61 It is considered that this document, when adopted, would need to be read in conjunction with the provisions of Policy D6 where there would appear to be greater flexibility for single aspect flats for higher density schemes. Although the previous draft 'Quality Homes for Londoners' SPG document was available in draft at the time, it was not referred to or given materiality in the GLA's hearing report.

Assessment – Daylight and Privacy

- 12.62 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.
- 12.63 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 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.
- 12.64 As with the Original Scheme, there are instances in the Proposed Development 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. The LBRuT Planning Committee notes that, despite criticisms, **“it is acknowledged that a significant proportion of units benefit from exceptional levels of outlook (in particular the north facing riverfront units)”** (paragraph 7.6.18) and that, on balance the accommodation was deemed acceptable.

- 12.65 Given that the scheme would provide adequate privacy for residential units through building distances and design techniques, it is considered that the Scheme is acceptable in respect of privacy.
- 12.66 The Internal Daylight and Sunlight Report, prepared by eb7, clearly demonstrates that all proposed residential units applied for in detail will have sufficient internal daylight levels. In respect of the elements applied for in outline, façade studies have been undertaken which show that the majority of areas are likely to achieve high levels of daylight / sunlight.
- 12.67 Therefore, it is considered that the proposed residential units will provide good levels of daylight, in line with London Plan Policy D2.

Assessment – Single Aspect

- 12.68 During the pre-application stage, the quantum of single aspect units within the Proposed Development was thoroughly scrutinised by the design team and the LBRuT’s DRP. As a result of comments received from the LBRuT’s DRP during the second meeting, design changes were made to reduce further the number of single aspect and north facing single aspect units proposed. This is set out below.
- 12.69 Prior to the second DRP the scheme had the following % of single aspect units:

% north facing, single aspect	Total single aspect units (Development Area 1)
7.4%	308 (53.9%)

Table 9: Single Aspect Units Proposed at second DRP

- 12.70 Following the second DRP held on 2 February 2022 the architect has reviewed the single aspect units in the scheme and has sought to reduce the number of these units in the scheme further through additional design development. As a result, the Proposed Development now comprises the following:

% north facing, single aspect	Total single aspect units (Development Area 1)	% Enhanced/Articulated Single Aspect (as a % of total single aspect)
4%	276 (49.46%)	70% (193 units)

Table 10: % of north facing single aspect and total single aspect units

12.71 While there remains a number of single aspect units within Development Area 1, many of these are enhanced single aspect units and take advantage of the masterplan layout which has been developed to allow excellent outlook for the maximum number of units possible. For the single aspect units now proposed, in line with the Housing SPG (2016) and regional and local planning policies it is considered that these are acceptable and comply with policy for the following reasons (as set out in the DAS):

- a) the single aspect units proposed are mostly one or two bedroom apartments, shallow in plan and with generous frontages. Within the mansion block typology, the articulation of balconies and bay windows enables an 'enhanced' single aspect view, which although cannot be defined as dual aspect, provides much wider views from inside the apartment, improving aspect significantly;
- b) On a typical floor, 67% of single aspect units are orientated to benefit from river views or green spaces. The remaining 32% have street views over Bottles works public square, Thames Street, Ship Line or one other secondary route and therefore overlook pleasant, tree lined spaces; and
- c) All rooms can be naturally ventilated (as set out in the submitted Energy Strategy, prepared by Hoare Lea).

12.72 There are only 4% north facing single aspect units now proposed in the scheme. This is due to the layout being optimised to increase the number of dual aspect apartments and reduce the number of north facing apartments.

- 12.73 Furthermore, according to paragraph 6.11 of the Internal Daylight and Sunlight Assessment, prepared by eb7, all the north facing single aspect units proposed meet the recommended BRE guidance in terms of daylight.
- 12.74 Section 7 of the DAS also demonstrates how the proposed apartments comply with the GLA’s Housing SPG in terms of ventilation, privacy and thermal comfort.
- 12.75 **In this context and within the aim of achieving an optimised scheme it is considered that the proposed level and quantum of single aspect units proposed is acceptable and all residential units achieve a high quality living environment.**
- 12.76 It is useful to note that similar levels of single and north single aspect units were proposed under the LBRuT Scheme and the GLA Scheme as set out below.

Scheme Name	% north facing, single aspect	Total single aspect (Development Area 1)
LBRuT Scheme	5%	48%
GLA Scheme	6.3%	51%

Table 11: Original Application single aspect units (%)

- 12.77 It is noteworthy that, when determining the Original Applications, the LBRuT Committee report specifically considered single aspect units. The report (paragraph 7.6.17) states that:

“With regard to aspect, approx. 48% of units within Development Area 1 are single aspect, and this was a concern raised by the GLA. However, within this, only 24 units (or 5%) are north facing, and 8 of which have good outlook towards the River, which on balance is deemed acceptable. These are all currently identified as market housing.”

- 12.78 It is also noted that the GLA in its hearing report summarised the scheme’s compliance with relevant policies as follows:

“406....the scheme provides a high standard of residential accommodation, with consideration to space standards; aspect; privacy and overlooking; daylight, sunlight and overshadowing; noise and vibration; and air quality. As discussed under ‘height, massing,

townscape, and local views' the proposed scale and massing of the scheme is acceptable and provides a new commercial centre for Mortlake as expressly required in the Stag Brewery Planning Brief SPD.

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

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

12.79 The GLA's Hearing Report refers to the Housing SPG in its summary of considerations. On the basis of compliance with D6, D3 and D2 above the report concludes that:

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

vi Shared Circulation

Planning Policy

12.80 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.

Assessment

12.81 The submitted Housing Assessment Matrix, prepared by Squire & 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 DAS at section 7.6.1.

Interim Conclusion

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

13 Design and Layout

Planning Policy

- 13.1 Planning policy at a national, strategic and local level require development to create high quality buildings and places in which people want to live and work.
- 13.2 At a national level, the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Chapter 12).
- 13.3 Paragraph 126 of the NPPF states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 13.4 Development should function well and add to the overall quality of the area over the lifetime of the development (NPPF, paragraph 130(a)). In pursuance of this, development should be visually attractive, sympathetic to the local character and context, maintain a strong sense of place and distinctiveness.
- 13.5 While achieving this, development should optimise the potential use of the Site including delivering an appropriate mix of green and public space (NPPF, paragraph 130(e)). The application of policy should not discourage appropriate innovation or change. Design quality should be considered throughout the evolution and assessment of individual proposals.
- 13.6 The NPPF states that the creation of high quality, beautiful and sustainable buildings and places is **“fundamental to what the planning and development process should achieve”**. The NPPF goes on to state that good design is a **“key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”** (paragraph 126).
- 13.7 Paragraph 1 of the PPG on Design (2019), states that local planning authorities are required to take design into consideration and should give great weight to outstanding or innovative designs which promote high levels of sustainability and help to raise the standard of design more generally in the area. It states that planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns

about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).

- 13.8 Paragraph 1 of the PPG on Design also sets out the key characteristics of well-designed places.
- 13.9 The London Plan requires good growth and high-quality architecture. 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.
- 13.10 London Plan (2021) Policy D9 requires boroughs to define [in future] Development Plans what they consider to a tall building for specific locations and identify suitable locations for tall buildings. Part C of the Policy D9 sets out the Visual, Functional and Environmental criteria against which tall buildings should be assessed.
- 13.11 Policy D3 sets out how site capacity should be optimised through a design-led approach. The factors considered in this are: form and layout, experience and quality and character.
- 13.12 Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design.
- 13.13 At a local level, the Local Plan sets out that all new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Development proposals will need to demonstrate that they are based on an analysis and understanding of the Borough's context and connect positively with their surroundings to create safe and inclusive places using good design principles.
- 13.14 Policy LP 1 which states that all development should be of high architectural and urban design quality. Policy LP 1 sets out a list of six criteria that will be used in assessing development proposals: 1) compatibility with local character; 2) sustainable design and construction; 3)

layout; 4) space between buildings; 5) Inclusive design, connectivity and permeability; and 6) suitability and compatibility of uses.

13.15 Local Plan Policy LP 2 sets out LBRuT's approach to building heights. It states that new buildings should be of appropriate heights which respect and strengthen the setting of the Borough's valued townscapes and landscapes. This should be achieved through buildings making a positive contribution towards local character, townscape and skyline, generally reflecting the prevailing building heights in the vicinity and preserving and enhancing heritage assets. The policy discourages the use of height to express and create local landmarks, and states that LBRuT will resist buildings that are taller than the surrounding townscape other than in exceptional circumstances. Respecting the local context and enhancing the character of an area should be achieved through appropriate: scale; height; mass; urban pattern; development grain; materials; streetscape; roofscape; and wider townscape and landscape. The Policy LP 2 supporting text (paragraph 4.2.3) sets out that 'taller' buildings are defined as those being significantly taller than the neighbouring buildings, but less than 18m in height (below six storeys). The text goes on to state that a 'tall' building is defined as a building of 18m in height or higher.

13.16 The SBPB sets out the key principles for the design of development on the Site. Paragraph 2.37 of the SBPB lists the key urban design issues related to the development of the Site as:

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

13.17 The SBPB requires a comprehensive approach to the development of the Site to prevent it being developed in a piecemeal fashion and create a master plan for progressive long term

development. The SBPB states that development should achieve high quality, sustainable and inspirational design of both buildings and open space using different design approaches and materials to avoid a similar approach across the whole site (page 16). The use of brick, stone, stucco and render is encouraged to reflect the traditional character of the site's surroundings (paragraph 2.37).

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

13.19 The adopted Site Allocation does not provide any additional guidance on appropriate building heights at the Site.

Assessment

Design Development

13.20 The proposals have been subject to extensive design scrutiny over several years, at pre- and post-application stage in respect of the Original Applications, this included a series of discussions with the LBRuT and GLA officers, other statutory and non-statutory bodies, and public consultation events.

13.21 In line with London Plan Policy D4(D), the Proposed Development has been subject to two DRPs with the LBRuT.

13.22 At the first DRP (held 30 September 2021) the Panel sought to suggest how the massing could be redistributed across the Site to respond to the GLA's decision to refuse the Original

Applications on grounds of height surrounding the Maltings and the Thamesbank listed buildings. Comments suggested that Buildings 8 and 10 could accommodate more height, along with Buildings 1, 2 and 6 (subject to Buildings 6 being realigned). The Panel felt that Buildings 20 and 21 would benefit from a reduction in height to three storeys. The Panel were also supportive of the design principles for the public realm and open spaces across the masterplan and the architectural mansion block typologies.

- 13.23 All comments received from the DRP1 (dated 20 October 2021) were thoroughly reviewed and considered by the design team. In direct response to the DRP comments, the scheme has been amended in the following ways:

DRP comment (20 October 2021)	Application Response
Dominance of built form over Maltings	Buildings 2, 3 and 7 (which surround the Maltings) have been reduced by 1 storey.
Additional height to redistribute massing to centre of the site	Buildings 8, 10 and part 12 have been increased by 1 storey.
Consideration of residential above proposed secondary school	Review and determined unfeasible in design and masterplan terms.
Supportive of the reduction in height of buildings 20, 21 and 22 (in comparison to the design refused by the GLA).	Buildings 20, 21 and 22 remain as terraced houses as per scheme originally submitted to, and resolved to approve by, LBRuT.
Consider Healthy Living Agenda	Community Use Agreement with school for the use of the sports facilities will be entered into by the Applicant. Sustainable transport methods encouraged by the provision of pedestrian and cycle routes throughout the Site.

‘Play on the way’ and water play principles.	These details are integrated into the scheme.
Green roof strategy required for Development Area 2.	This has been included within the Design Code.
Management and maintenance strategy for the green roofs in Development Area 2 required.	This has been included in the application.
Sustainability principles must be considered.	Sustainability targets have been carefully considered and integrated into the scheme. See submitted Sustainability Statement, prepared by Hoare Lea and Chapter 17 of this Statement.

Table 12: DRP 1 Comments and Application Responses

13.24 The Applicant went back to LBRuT’s DRP on 2 February 2022. At that meeting, the DRP raised concerns principally with the:

- iv. Number of single aspect units;
- v. Urban Greening Factor (UGF) score; and
- vi. Appropriateness and detailing of the mansion block design.

13.25 The scheme has responded to the DRP’s comments in the following ways:

DRP Comments (02 February 2022)	Application Response
Concern raised regarding the quantum of single aspect units.	Design team have reviewed the Proposed Development as a whole. Buildings 2, 10, 18 and 19 have since been internally replanned to reduce the number of single aspect units

	(for details see DAS, prepared by Squire & Partners).
There should be a maximum of 8 residential units per core.	Buildings 10 and 2 have been internally replanned. The number of cores with more than 8 apartments on each floor has been reduced.
Requested that the Urban Greening Factor (UGF) score is improved	Design team have reviewed and improved the UGF score from 0.23 (site wide) to 0.286 (site wide). Further details are included in the Masterplan Landscape DAS, prepared by Gillespies.
Appropriateness and detailing of the mansion block design	<p>Mansion block design is considered appropriate for the Site and its context.</p> <p>Squire & Partners have undertaken further development of the detailing of the Mansion Block typology to show how the typology could be developed to refine and add delight to the building facades, more akin to the historical precedents. See submitted DAS for details.</p>

Table 13: DRP 2 Comments and Application Responses

- 13.26 Where the DRP’s suggestions have not been incorporated into the designs, this has been clearly explained in the DAS, prepared by Squire & Partners and Section 14 of this Statement.
- 13.27 The Proposed Development proposes buildings which can be defined as tall buildings and has undergone two Design Review Panels (held 30 September 2021 and 2 February 2022). It is therefore considered that the Proposed Development complies with the aims of Policy D4 which seek to achieve good growth across London and Policy D4(D) which requires major developments to have undergone at least one design review.

13.28 The design has been developed with sustainability principles at its heart. As set out in Section 5.9 of the DAS and below the following features have been incorporated into the design to maximise the energy efficiency and minimise carbon emissions, in line with regional and local planning policy:

- i. Adoption of passive design measures through specification of glazing, insulation and air permeability in order to prevent heat loss;
- ii. Adoption of energy efficiency measures include efficient and carefully controlled space heating systems, low-energy lighting, mechanical ventilation with heat recovery, appropriately insulated pipework and ductwork and the provision of variable speed pumps and fans;
- iii. Air-Source Heat Pump energy strategy;
- iv. Solar PV system at roof level of the buildings to further reduce CO2 emissions;
- v. Green roofs which will contain wildflower (90%) and native grass (10%) mix;
- vi. Waste recycling in compliance with statutory standards;
- vii. Water efficient fittings in all residential apartments;
- viii. Responsibly sourced materials will be utilised wherever possible;
- ix. Energy efficient white goods and equipment will be specified;
- x. Ecological enhancements will be incorporated, including more green space and more trees; and
- xi. A target rating of BREEAM 'Excellent'.

Masterplan and Character Areas

13.29 The approach to the character areas, design typology and proposed materials remains as per the Original Scheme.

13.30 Volume 1 of the submitted Design and Access Statement outlines the overall design principles for the masterplan and provides an overview of the character areas which make up the

Proposed Development. The masterplan incorporates both sides of the Site (Development Area 1 and 2 and the school) and incorporates 21 individual buildings, with the former Maltings Building to be retained, and new buildings to be constructed behind retained façades of the Former Bottling Hall and Former Hotel Building. The scheme proposes to introduce distinct character areas across the Site, which reflect their intended use and level of public interaction. The design of the buildings and the public and private spaces around them reflect the character area design cues.

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

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

- 1) A new 'high street' with a focus on activity, retail and other non-residential uses such as the cinema, including a warehouse building typology.
- 2) A 'riverside' area with public spaces opening to the river and a range of narrow streets and wider routes, including riverside housing with a mansion block building typology.
- 3) An area of 'gardens' is identified with more enclosed spaces and more intimate planting.
- 4) A 'quadrangle' character is proposed for the area around and incorporating the large element of the secondary school.
- 5) Finally, a more formal square with an open garden space which is surrounded by buildings of a similar height and character.

13.33 These character areas respond to their context which is a key objective of policy at national, regional and local levels but also create distinctive areas to avoid homogenous development,

as required by the SBPB. The overall design principles for the masterplan vision ensure a coordinated and consistent approach across the Site, with the proposed scheme exemplifying the highest quality urban design.

Layout

- 13.34 The layout of the Proposed Development takes cues from the grain and pattern of terrace streets found in the Mortlake area. This evolved by introducing new routes from the existing village to the riverside, creating permeability that is currently limited by the Brewery enclosure and fulfilling a key objective of the SBPB. The masterplan also includes a 'green link' (measuring from 30m to 38m in width) which provides a heart to the scheme and acts as both a park and a street leading from Mortlake Green to the riverfront. The green link has been widened and straightened during the design evolution process, in response to feedback from the local community and LBRuT. The new high street ('Thames Street') is the main cross-street which defines the primarily residential blocks to the north and principally commercial buildings to the south.
- 13.35 Public open spaces are created adjacent to the primary heritage buildings on the Site, which facilitates a continuation of the liveliness of the high street into these spaces. These spaces are the Maltings Plaza outside of the refurbished Maltings Building (block 4) and the Bottleworks Square, the new open space to the rear of blocks 5 and 6, which are being developed behind the retained façades of the Former Bottling Hall and Former Hotel Building. In addition, quieter open spaces are located to the 'rear' of the residential blocks formed by the principal routes. Larger landscaped spaces in the western part of the Site (Development Area 2) are more disparate, creating a different character for each collection of buildings. Further detail on the proposed public realm and landscaping can be found within Section 14 of this Town Planning Statement and within the submitted Landscape Design and Access Statement, prepared by Gillespies. It is therefore considered that the design team have ensured that a hierarchy of spaces and routes will be delivered across the Site in line with the aspirations of the SBPB.
- 13.36 The proposed layout of residential units and in particular living areas within these units is designed to be both maximise views to the surrounding area but also to minimise privacy issues to adjacent buildings. Further details on residential design and quality can be found

within section 12 of this Town Planning Statement and within the submitted Design and Access Statement and Housing Assessment Matrix, prepared by Squire & Partners.

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

Heights

- 13.38 The proposed buildings will be in line with, or lower than, the heights of the existing buildings on the Site and have been designed to step back from the Maltings buildings (a BTM). However, it is acknowledged that building heights in the wider context are varied and that the proposed buildings are, in large part, taller than those in the surrounding area. This Statement and accompanying chapters of the ES consider the assessment criteria set out in London Plan Policy D9 (C) which covers visual, functional and environmental impacts. It is concluded that the proposed buildings comply with both London Plan Policy D9, Local Plan Policy LP 2.
- 13.39 Adopted policy specifies that tall buildings are defined as over 6 storeys, or 18 metres in height (consistent with London Plan Policy D9). The emerging LBRuT Local Plan (2021) identifies the Site as a location for mid-rise and tall buildings but carries no weight. The policy does state that any building heights of 7 storeys would be appropriate.
- 13.40 Given the emerging local policy carries no weight, the Site is technically not in a location where tall buildings would be acceptable. Notwithstanding this, the principle of the Site as an appropriate location for a tall building has been considered against the criteria framework of Policy D9 (C) from paragraph 13.41 of this Statement.

London Plan Policy D9 – Part C Assessment

Visual Impacts

- 13.41 Criterion a) relates to the requirement for the building to be assessed in a range of views from intermediate to long-range. Chapter 17 of the ES and associated Figure 2 provides the Townscape and Visual Impacts Assessment. In response to Criterion a) parts (i) and (ii) the Chapter concludes that the likely significance of the scheme on the townscape character

areas would range from long term local effects of moderate, beneficial significance to long term local effects of major beneficial significance. In response to Criterion a) part (iii) the Chapter concludes that the likely significance of the scheme of visual amenity of most local views would range from minor to major beneficial significance. Road users in Viewpoint location 2 would experience effects of minor adverse significance, however this would be temporarily in transit. Recreational users of the Thames Path National Trail at Viewpoint 2 would experience long term local effects of moderate adverse significance.

- 13.42 Criterion b) relates to spatial hierarchy. The Proposed Development has been designed to have a clear and legible hierarchy of spaces and buildings reflecting the proposed land uses in that location, be it commercial or residential, and also allowing for optimal connections and views across the Site. The 'green link' proposed from Mortlake Green to the River Thames provides a clear line of sight to the river through the Site and is a marker to aid legibility. The hierarchy of spaces and buildings is clearly shown within the DAS (Sections 4.3 and 7.3). The legibility of the Proposed Development is also clearly shown in the pedestrian and cycle routes drawings included within Landscape DAS (pages 27 and 28).
- 13.43 Criterion c) requires an exemplary standard of architectural quality and materials to ensure that the appearance and architectural integrity of the building is maintained throughout its lifespan.
- 13.44 The DAS submitted with the Applications sets out the proposed design approach, including materials. The Proposed Development will be constructed using high quality, robust materials that minimise maintenance requirements over its lifetime. The materials and architectural approach are considered to be an exemplary standard.
- 13.45 Criterion d) requires proposals take account of, and avoid harm to, the significance of London's heritage assets and their settings. Careful consideration has been given to the heights of the proposed buildings and care has been taken with respect of impact on nearby Conservation Areas, listed buildings and local views and context.
- 13.46 In particular, Buildings 20 and 21 have been redesigned since the GLA's determination of the Original Applications. These buildings now step back from the listed buildings at Thamesbank and only rise to 3 storeys, reducing their height and massing to respect the character and appearance of the listed buildings. Moreover, the proposed buildings surrounding the Maltings (nos. 2, 3 and 7) have been reduced in height since the GLA's determination of the

- Original Applications. Again, this was to ensure that the character and appearance of the Maltings as a BTM was preserved.
- 13.47 Submitted ES Chapter 15 provides a detailed assessment of significance of impact of the proposals on the significance of the heritage assets within and surrounding the Site. The conclusions of that report are summarised in Section 16 of this Statement.
- 13.48 Criterion e) is not relevant as it relates to proposals affecting World Heritage Sites.
- 13.49 Criterion f) relates to buildings within the setting of the River Thames. New buildings should protect and enhance the open quality of the river and the riverside public realm, including views.
- 13.50 The Site has been designed to celebrate and respect its riverside location. The buildings proposed adjacent to the river are in a north-south orientation to ensure that views of the river through the Site and from within the buildings are achieved. The buildings adjacent to the river are set back from the towpath. The Proposed Development includes works to maintain the towpath running along the northern boundary of the Site, respecting the existing character of the riverside public realm. The Proposed Development will also deliver 'Maltings Plaza' a significant new area of public realm outside the Maltings building which will include spaces to dwell and play, significantly improving the riverside public realm in this location. The introduction of flexible uses to the ground floor of buildings which terminate on the riverfront will also activate the riverside public realm, contributing to and enhancing its character and function as public space. It is considered therefore that the Proposed Development will respect the openness of the Site's River Thames location and enhance the existing quality and character of this area.
- 13.51 Criterion g) relates to solar glare.
- 13.52 The materials proposed do not give rise to reflective solar glare, due to their solidity. Areas of glazing have also been designed to be intermittent, to avoid large expanses of reflection.
- 13.53 In terms of light pollution, Criterion h) advises that buildings should minimise light pollution from internal and external lighting.
- 13.54 Except for Buildings 1 and 5, all the upper floors of the proposed buildings are residential in use and so it is not expected that there will be any light spill as lights are unlikely to be on 24

hours a day and the lighting will not comprise of large quantities of fluorescent lighting associated with commercial buildings. A Lighting Masterplan and Sports Pitch Floodlighting Assessment have also been submitted with the Applications. Both documents out how the proposed lighting within the scheme has been designed to minimise light spill will be limited throughout the Site.

- 13.55 Part C(2) of the Policy relates to functional impact.
- 13.56 Criterion a) requires tall buildings to be designed for the safety of all occupants.
- 13.57 In accordance with London Plan Policy D12, the Proposed Development has been designed to the highest standards of fire safety. A Fire Statement (including a completed Gateway 1 form) has been submitted in support of the Applications.
- 13.58 Criterion b) requires tall buildings to be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm.
- 13.59 The DAS submitted with this application sets out the proposed design approach including materials. The building is constructed using robust, high-quality materials that minimise maintenance requirements over its lifetime. The refuse and servicing deliveries proposed have been set out in the submitted Delivery and Servicing Plan (DSP), prepared by Stantec. The conclusions of the DSP are addressed in Section 15 of this Statement.
- 13.60 Criterion c) relates to entrances, access routes and ground floor uses being designed and placed to ensure that there is no unacceptable overcrowding.
- 13.61 As demonstrated in the Landscape DAS, the Proposed Development has been carefully designed to provide large areas of circulation throughout the Site for all modes of sustainable transport (pages 26, 27 and 28). Areas of hardscaping have been located beside land uses which will generate a greater level of footfall, such as the flexible uses along the new high street and Maltings Plaza.
- 13.62 It is also considered that the design of the masterplan site ensure that there is a high level of natural surveillance and lighting throughout the daytime and night time to ensure that there is no unacceptable isolation.

- 13.63 Criterion d) requires the capacity of the area and its transport network to be capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycle networks and public transport for people living and working in the building.
- 13.64 A Transport Assessment (TA) has been submitted in support of the Applications. The TA concludes that the Proposed Development accords well with planning policy and guidance at all levels in terms of transport. The TA goes on to state that, when taking into account the proposed mitigation measures, the Proposed Development will have no severe residual impacts on the operation of the transport networks serving the Site and will provide major benefits in the form of enhanced pedestrian and cycle linkages and much enhanced access for the wider community to the riverside. For further details, please see Section 15 of this Statement and the accompanying TA, prepared by Stantec.
- 13.65 Criterion e) states that the jobs, services, facilities and economic activity that will be provided by the development should inform the design so it maximises the benefits these could bring to the areas and maximises the role the development could play in catalysing further change in the area.
- 13.66 The Proposed Development includes provision of a minimum of 6,547 sqm (GIA) of office floorspace and a total of 4,839 sqm (GIA) of flexible uses. A cinema and hotel (up to 15 beds) are also proposed. According to the Employment Assessment, prepared by Hatch, these commercial uses will deliver 341 FTEs. The commercial uses have been designed to be predominantly at ground floor level to activate the street scene and deliver a true high street look and feel to the Site. Commercial uses have also been designed to line the 'green link' through the Site which will draw footfall from Mortlake Green through the Site to the River Thames. The cinema has been located at the south of the Site and has its own design typology providing a visual cue that the use within that building differs to others in the Site and referencing the history of cinema (see DAS paragraphs 5.6.11-5.6.14).
- 13.67 Finally, Criterion f) states that buildings, including their construction, should not interfere with aviation, navigation or telecommunication and should avoid a significant effect on solar energy generation on adjoining buildings.
- 13.68 A Framework Construction Management Statement (FCMS) has been submitted in support of the Applications and a further version of this will be required by condition and will be submitted when a contractor is on board. This will ensure the construction of the Proposed

Development does not interfere with aviation, navigation or telecommunication. In terms of solar energy generation of adjacent buildings, Chapter 18 of the ES provides an overshadowing assessment. The assessment concludes that the Proposed Development will likely have insignificant effects in terms of overshadowing, with no mitigation measures proposed. It is also worth noting that the proposed buildings are all lower in height than the existing structures at the Site. It is therefore considered that the Proposed Development will not prejudice solar energy generation at neighbouring buildings.

- 13.69 Part C(3) sets out criteria to assess the environmental impacts.
- 13.70 Criterion a) of this section relates to wind, daylight, sunlight penetration and temperature conditions around the building to ensure comfort and the enjoyment of open spaces is not compromised.
- 13.71 A wind microclimate assessment has been submitted under Chapter 17 of the ES. The report finds that the Proposed Development will likely have effects ranging from insignificant to long term local beneficial effects of between minor to moderate significance. The report recommends mitigation measures through potential reserved matters design measures, landscaping, and planters.
- 13.72 The Internal Daylight and Sunlight Report assesses the impact of the proposals on the new landscaped amenity spaces within the Site boundary. The report and finds that the Proposed Development has been designed to allow suitable light penetration to amenity areas where possible. The assessment has shown that 10 of the 20 amenity areas would experience direct sunlight across more than 50% of their area for 2 hours or more on the 21st of March. The results for the amenity areas as a whole including the school playing field show that 77% of the total area would experience 2 hours of direct sunlight. Excluding the school, the overall percentage equates to c.59%. Whilst there are areas below the suggested targets, these areas will receive some direct sunlight for part of the day. The assessment in June shows that the vast majority of areas see good levels of direct sunlight on this date.
- 13.73 Criterion b) relates to air movement and ensuring the effective dispersion of pollutants, but not adversely affect street level conditions.
- 13.74 Chapter 12 of the ES provides an Air Quality Assessment. The report states that the impact on air quality during the operational phase of the Proposed Development is insignificant with

no mitigation required. Furthermore, an Odour Assessment Report, prepared by Waterman IE, has also been provided which sets out design principles for ventilation of the food and drink uses at ground floor level. It is intended that the detailed design would be secured by a suitably worded planning condition. As such, the report concludes that it is not anticipated that odours generated by food and drink establishments within the Proposed Development would give rise to significant environmental effects.

- 13.75 Criterion c) states that noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the proposed building(s).
- 13.76 ES Chapter 9 finds that the Proposed Development would likely give rise to insignificant effects in terms of noise. Therefore the comfort and enjoyment of open spaces around the proposed buildings will not be harmed.
- 13.77 Part C(4)(a) requires the consideration of the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area when assessing tall building proposals.
- 13.78 When taken as a whole, the application submission pack assesses the cumulative impact of the Proposed Development. Paragraph 20.6 of Chapter 20 of the ES demonstrates the cumulative impacts assessed. No schemes within 1km of the Site were considered relevant for the cumulative impact assessment. The list of schemes initially considered, but ultimately discounted, in the surrounding area was shared and agreed with planning officers at LBRuT during the pre-application discussions.
- 13.79 Part D of the assessment framework of Policy D9 sets out a requirement for free to enter publicly accessible areas to be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.
- 13.80 As the upper levels of all the proposed buildings (except Buildings 1 and 5) are residential in use, it is not appropriate to have a public viewing area at the top of any of the proposed buildings. Significant areas of public realm are provided at ground level giving access to the

Thames, which is considered to address the policy aspiration to provide public spaces in optimum viewing locations within tall building developments.

13.81 **It is considered that the detailed assessment of the Proposed Development against the criteria framework set out to assess the acceptability of a tall building, clearly demonstrates that the scale of the buildings proposed in this development would be appropriate and compliant with Policy D9 when considered as a whole.**

13.82 It is also worth noting that the GLA Hearing Report (paragraph 386) in respect of the previous proposal stated that aspects of the detailed element of the scheme were **'supported'** against various criteria in relation to London Plan Policy D9. This was despite the fact that the previous scheme was taller in parts. Paragraph 387 of the same report went on to state that the previous scheme was of an **"acceptable height and massing and has an acceptable impact on townscape and views"**. Although the scheme was found to be contrary to London Plan Policy D9, GLA planning officers considered that, notwithstanding the conflict in part with Policy D9, in the planning balance **"the proposed development is considered to comply with all other policies and is considered to accord with the development plan overall. Even were that not the case, having regard to the material considerations set out within this report, GLA officers consider that the planning balance weighs in favour of the grant of permission"** (paragraph 704).

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

13.84 The proposals accord with the general principal in the SBPB that height should be greatest in the centre of the Site and that height of new buildings should preserve the pre-eminence and character of the heritage buildings, in particular The Maltings. This reflects a design-led approach creating a mix of heights and optimising the Site's potential across the masterplan.

13.85 The heights of the proposed buildings have been scrutinised by the LBRuT's DRP on two occasions. In direct response to the comments received, Squire & Partners made the amendments set out in Table 11 of this Statement. In comments dated 28 February 2022, the DRP stated that they are **"generally supportive of the massing and height of the scheme"** and **"generally supportive of the height distribution across the site"** excepting building 10. Squire & Partners and Waterman IE (heritage) have reviewed Building 10 since the receipt of

these comments. The southern elevation of Building 10 would be approximately 60m in length and 7-storeys in height, approximately 11m taller in height than Building 5. Waterman IE have found that Building 10 would, therefore, be the more prominent structure in the west facing views along Mortlake High Street, to the east, although the main façade of the Former Bottling Building is not readily discernible in this view. The key view towards the façade, from the south side of Mortlake High Street facing north, would remain unchanged. Building 5 and Building 10 would be separated by a tree-lined pedestrian street providing access into the Development, however, forming a clear separation between the two buildings, allowing them to be understood as distinct and separate buildings. The two buildings would share some architectural similarities, such as the arched window detailing, which allows them to complement one another, however, they would be distinguishable as individual buildings, preserving the historic and architectural value of the Former Bottling Building.

13.86 The setting of the Former Bottling Building has evolved since it was constructed as the use of the site for brewing evolved, and the building itself has been subject to various phases of alterations. It is also noteworthy that historically the Former Bottling Building has shared this street frontage with other buildings, now represented by the remains of the Southern Boundary Wall. The addition of Building 10, while of greater scale and mass compared to the Former Bottling Building, would not be overly dominant and would not have an adverse impact on the setting of the Former Bottling Building, and therefore would not compromise the heritage significance of the heritage asset.

13.87 Therefore it is considered that the proposed height and design of Building 10 is appropriate.

13.88 The Proposed Development generally accords with the principle outlined in the SBPB that height should be greatest in the centre of the Site and drop significantly towards the edges to the east, south and west. However, this is not the case to the north adjacent to the riverside, where the proposed buildings are between 5 and 9 storeys. Whilst it is recognised that this does not follow the guidance in the Planning Brief, there are a number of reasons which justify a departure in this instance:

a) Historically the Site's industrial use has meant that buildings by the river have been of significant height, as demonstrated by the existing Maltings Building. The existing disused brewery buildings which sit in the setting of the listed buildings on the Thames Bank and the Maltings (BTM) are of a very poor quality and are large uninteresting buildings. The

existing buildings detract from the character and appearance of these statutorily and locally listed buildings.

b) There are numerous examples of older mansion style blocks and contemporary precedents by the river (as outlined in the Design and Access Statement) which successfully strike the balance between incorporating an appropriate set-back to avoid overshadowing the riverside but are also prominent enough to bring character to the frontage.

c) The buildings have been designed to avoid a continuous line of development on the riverside through the inclusion of landscaped spaces and routes through to Mortlake High Street. The mix of building heights in this part of the Site, setbacks at upper levels and variety of frontage line and circulation between the buildings and river wall ensure that the Proposed Development does not dominate the towpath or riverside environment.

d) The impact of this part of the development on townscape has been tested (as outlined in the ES) and it has been demonstrated that there will be no adverse impact on views to the river through the Site.

e) Squire & Partners have varied materiality, building articulation and roof lines along the waterfront to further 'break up' the massing in this section of the Site, as demonstrated on page 85 of the DAS. This responds directly comments received from the DRP and LBRuT officers. Roof heights are varied throughout the masterplan, particularly by the inclusion of two 'cupola' features at the corners of Buildings 2 and 7, which rise a further storey and terminate in a domed roof. This serves to frame the entrance of the new Green Link and will aid legibility through the Site.

13.89 Therefore, it is considered that in terms of visual, functional, environmental and cumulative impact, the heights of the proposed buildings at the Site are acceptable.

13.90 **The Proposed Development includes buildings of appropriate heights which respect and strengthen the local townscape context in accordance with London Plan Policy D9 and Local Plan Policy LP 2. The mix of building heights proposed generally align with the guidelines set out in the Planning Brief and any divergence is justified on the merits of the scheme which exemplifies architectural design of the highest quality.**

Massing and Density

- 13.91 The Site area of the Site is 9.25 ha. As set out within the submitted OSPPA, the total amenity space provided throughout the development amounts to approximately 4.83ha (including towpath) / 4.54ha (excluding towpath), equating to approximately 51% of the overall site area. This open space to building footprint ratio is considered appropriate in the Site's context. Residential density has been assessed within Chapter 12 of this Statement.
- 13.92 The townscape assessment within the ES (Chapter 16) demonstrates that the building massing rises to the centre of the Site and diminishes to the east and west, as required by the SBPB. The proposals avoid continuous development on the riverside and the mass of buildings is broken up through the network of north-south and east-west routes through the Site, the range of landscaped open spaces, setbacks at upper levels and variation in the architectural detailing of facades and roofscapes.
- 13.93 The energy strategy has also been developed to ensure that a high-quality roofline design is achieved on the Site. The strategy involves sinking the plant equipment which will serve Development Area 1 into the upper level of Building 5.
- 13.94 **On the above basis, the overall density of development and massing of buildings is appropriate to the Site's setting and surrounding built form.**
- 13.95 It is also noted that, in its comments on 28 February 2022, the LBRuT DRP gave its general support for the massing of the scheme.

Design Typology and Materials

- 13.96 A series of common architectural themes have emerged which are reflected across the buildings which not only pick up on the typologies of the local context, but also those common to riverside locations in the wider area. The design intent of the element applied for in outline (Application A – Development Area 2) is considered at a more strategy level and will be guided at Reserved Matters stage by the Design Codes. Squire & Partners have developed three distinct building typologies for the detailed elements (Application A – Development Area 1), including:

- a) 'Warehouse' typology – mostly located in the southern part of the Site by Mortlake High Street, this draws on the style of the heritage buildings onsite to create an

archetypal warehouse typology in terms of the rhythm of the façade and window openings.

- b) 'Mansion Block' typology – mostly located in the northern part of the Site, this is a contemporary interpretation of the typical mansion block buildings found along the river.
- c) 'Cinema' typology – this is unique in the masterplan as it only relates to the proposed cinema which is located in a prominent position on the junction of the green link with Lower Richmond Road. It follows an art-deco typology including a grand entrance and horizontal canopy, and distinctive 'scalloped bays' and a multitude of windows at upper levels.

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

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

13.99 Section 7.8 of the DAS describes in detail the proposed appearance and detailing of all the buildings proposed within Development Area 1. It is noted that the DRP supported the proposed warehouse typology in comments dated 28 February 2022.

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

13.101 It is noted that the GLA officer report states that the **"design, architecture and materials of the detailed components of the applications are of a high quality and are supported"** (paragraph 399). The GLA also considered that for the elements applied for in outline, the

submitted details demonstrated that these buildings would be of a high-quality design, subject to Reserved Matters applications.

Inclusive Access

13.102 The Proposed Development also provides an excellent level of inclusive design. Full explanation of the proposed inclusive access details are set out within the DAS, however, the key access provisions for the Proposed Development include:

- a) Incorporation of the principles for inclusive design wherever possible;
- b) Accessible routes to all connections with local pedestrian routes and public transport, with a drop off area provided to the east of the Site accessed via Mortlake High Street;
- c) Inclusion of on-site car parking for blue badge holders;
- d) Step-free access to all public and residential parts of the buildings, with all slopes to public realm areas designed to a maximum of 1:22 or better; and
- e) Wheelchair accessible and adaptable residential units would be provided – see section 12 of this Town Planning Statement.

13.103 The principles of accessible and inclusive design are integral to the Proposed Development in accordance with London Plan Policy D5 and the requirements of building regulations.

Basements

Planning Policy

13.104 Local Plan Policy LP 11 Part B (1-6) sets out the measures that basement development proposals are required to comply with.

Assessment

13.105 There will be two single storey basements under the majority of the Site and buildings – one under Development Area 1 and one under Development Area 2. The basement under the

cinema will be two storeys to allow for an additional screen. No basement is proposed underneath blocks 14, 18, 19, 20, 21 or under the school.

13.106 The basements would provide car parking, plant space and water tanks (for the Fire Strategy) for the wider development. The only external manifestations of the basement structure would be vehicle entrances which include appropriate build-up of levels to act as passive flood protection.

13.107 In line with LBRuT Policy LP 11, the design of the basement is appropriate to its function, and it would not have any adverse impact on the surrounding character and appearance of the building form surrounding the Site.

School – Design Considerations

13.108 The proposed secondary school is a distinct element within the wider masterplan. Details of the design and landscaping approach can be found within the submitted DAS for Application B. The Applicant has worked closely with the LBRuT and ESFA on the proposed design to ensure it addresses the rest of the scheme and surrounding context but is also fit for purpose.

13.109 The location and orientation of the school was subject to extensive discussions at pre-application stage for the Original Applications. The final selection to the west of Ship Lane aligns most closely to the indicative layout included in the SBPB. The proposed location also minimises the built form on the existing playing fields and is set away from Williams Lane, therefore reducing the potential impact on existing residential properties in this area. Overall, it is considered the optimal location for this facility within the masterplan. Further detail on the evolution of the school location can be found within the submitted OSPPA.

13.110 The building form and massing is a rectangular three storey block with a repeated grid of brick piers. The building façade is designed to be a rational expression of the internal rhythm of the building with the emphasis on entrances and exits. Materials include light coloured stock bricks which respond appropriately to the surrounding context other typologies within the masterplan.

13.111 Since the determination of the Original Applications, the energy strategy for the school has been reviewed to ensure that it complies with London Plan (2021) policies. In response to this the updated Energy Strategy, prepared by Hoare Lea, has necessitated the replacement

of the boiler room at roof level with an open-air enclosure with Air Source Heat Pumps (ASHPs) to provide the building with heating and cooling. This has also required a pump room to be located at ground floor.

13.112 The design of the proposed school represents high quality and durability which is reflective of its function. Its height, scale and mass are in keeping with the local context and its location minimises the impact on the existing playing fields and nearby residential amenity. It is fully in accordance with the objectives of the NPPF, London Plan and local policy.

13.113 **Overall, the design of the Proposed Development is of a high quality that has been developed with close regard to the surrounding context in terms of scale, massing and orientation. The proposed buildings, and the public spaces and streets between them, would create an attractive and distinctive place that will enhance the character of the Mortlake area as well as significantly improving its legibility and permeability, in accordance with the policies of the London Plan, Local Plan, and the guidance within the SBPB.**

13.114 **The Proposed Development will 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. The design has also been scrutinised on two separate occasions by the LBRuT DRP.**

Fire Strategy

Planning Policy

13.115 London Plan Policy D12 states that all development proposals should be accompanied by a Fire Statement and must achieve the highest standards of fire safety.

Assessment

13.116 Hoare Lea have provided a Fire Statement which has been prepared in line with the requirements of London Plan Policy D12 and is submitted in support of these Applications. The Fire Statement demonstrates that fire safety has been considered at the earliest stage

and that the fire safety strategy would be considered in detail at a later stage outside of the planning process.

13.117 A Gateway 1 form has also been completed and is submitted with the Applications.

14 Public Realm, Landscaping and Design of Open Spaces

Public Realm and Landscape Strategy Overview

- 14.1 Integrating well-designed open and green spaces and improving the permeability of the Site has been fundamental to the masterplanning of the scheme, which is in line with the Council’s vision for the Site as set out within the SBPB and the Site Allocation.
- 14.2 Landscape architects Gillespies have worked closely with the architects, the LBRuT and relevant stakeholders to develop a landscape and public realm which is accessible, sustainable and functional and which complements the design of the built environment by providing external spaces that maximise the enjoyment of and connection to the wider context.
- 14.3 The proposed landscaping works can be split into different components for each application. These components are described in this section and set out in greater detail in the documents as shown in table 14 below.

Landscaping Component	Relevant Submission Document
Application A (Development Area 1) – areas applied for in detail under the hybrid application	Landscape Design and Access Statement, prepared by Gillespies.
Application A (Development Area 2) – areas applied for in outline under the hybrid application	Design Code, prepared by Squire & Partners with input from Gillespies (for elements applied for in outline only).
Application B (School)	Design and Access Statement, prepared by Squire & Partners, with landscape section prepared by Gillespies.

Table 14: Landscaping Components

Planning Policy

- 14.4 NPPF paragraph 130 stresses the importance of a good public realm in delivering well-designed mixed-use developments and healthy communities.
- 14.5 Part B of London Plan Policy D8 states that London’s public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Policy G1 of the same Plan states that green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. Policy G4 sets out that development proposals should (1) not result in the loss of protected open space and (2) where possible, create areas of publicly accessible space, particularly in areas of deficiency.
- 14.6 LBRuT’s Strategic Vision (as set out within the Local Plan) also encourages the development of an attractive public realm which encourages walking and cycling. This Vision is supported by Local Plan Policy LP 1, the Design Quality SPD (2006) and the Public Space Design Guide (2006). Local Plan Policy LP 12 encourages the enhancement of green infrastructure. Associated with this aim, Local Plan Policy LP 17 states that major developments should incorporate green and brown roofs into schemes, with the aim to be to use at least 70% of any potential roof plate as a green/brown roof.

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

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

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

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

- 14.8 Landscaping details for Development Area 2 will be agreed and secured via future Reserved Matters submissions to LBRuT. The submitted Design Code and parameter plans set out landscape requirements future Reserved Matters submissions will need to be in line with.
- 14.9 As set out within the landscape section of Design Code, the public realm objectives for Development Area 2 are:
 - a) Provide permeability and connectivity;
 - b) Be accessible, inclusive and safe;
 - c) Be simple, consistent, of high quality and minimise clutter;
 - d) Reflect the Site’s special qualities and distinctive character;
 - e) Be multi-purpose and flexible;
 - f) Provide amenity; and

g) Be sustainable.

14.10 The submitted Open Space Parameter Plan (ref: P10736-00-004-GIL-0121 Rev P00) sets out how open space will be provided within Development Area 2. Flexible open spaces will be provided with planting and playspace to be provided for the new residents. A new community park will be provided to the south-west of the new school which will be publicly accessible and will provide play facilities for children.

Assessment

14.11 The Landscape DAS explains that the masterplan is founded on a concept of built form interspersed with a range of open spaces with pedestrian priority as the focus of the public realm. A variety of open spaces would be provided which would create different spaces and provide different functions. Depending on the function of the space, some of the public realm would be private (e.g. the townhouse gardens), or public (e.g. the residential courtyards and the open spaces around the commercial uses). The approach to public realm has also sought to increase permeability to and through the Site and improve public access, in line with the Site Allocation (SA 24) and Local Plan Policy LP 1 (5). Where appropriate, the public realm has sought to take cues from the history of the Site and the local area, for example the River Thames is reflected in the landscaping of Maltings Plaza, in accordance with London Plan Policy G1.

14.12 In accordance with LBRuT's Public Space Design Guide, the scheme will seek to develop public art within the new landscape, including sculptures, play installations, paving art, light and sound pieces, and other types of art.

14.13 As set out within the Landscape Design and Access Statement, the approach to landscaping has been to select species and types of planting which would deliver a mix of native, locally adapted and exotic plants to increase biodiversity and a sustainable mix of plants with improved drought resistance and longevity. This is in accordance with London Plan Policy G5 and LBRuT Local Plan Policy LP 12 to encourage green infrastructure. Green and brown roofs would be provided at roof level, in accordance with London Plan Policy G5, LBRuT Local Plan LP 17. The amount of biodiverse roof provided needs to be balanced against the requirement for necessary plant and machinery, renewable technologies (photovoltaic panels) and consideration of visual impact. Detailed designs of the roofscapes for the buildings to be provided within Development Area 2 will be secured via future Reserved Matters submissions. The green/brown roofs would be

provided in addition to the significant amount of publicly accessible open and green space provided throughout the scheme.

- 14.14 The proposals for public realm at the Site are clearly in line with London Plan Policy G4(B)(2), the existing site has no publicly accessible open space, whereas the proposed scheme will deliver approximately 3.94 ha. The GLA Hearing Report reflects this, stating that the proposed landscaping and public realm at the Site represented “**substantial improvements to the quality, legibility and usability of the public realm**” (paragraph 268).
- 14.15 The existing Site does not provide any public access and currently acts as a barrier between Mortlake and the river. The Proposed Development will open up the Site through the creation of a number of attractive and varied thoroughfares and new open spaces. A significant amount of new green open space and amenity space will be provided, which can be enjoyed by new and existing local residents and visitors.
- 14.16 **In line with planning policy at all levels, the project team has taken a considered approach to landscaping and public realm, and has sought to develop attractive spaces which are efficient and functional.**

Public Realm and Landscape Strategy – Application B (School)

- 14.17 The public realm and open spaces to be provided for the new school are intrinsically linked to the function that these spaces will need to provide for the new school users and the wider community. The school would include the provision of a new MUGA, a full sized 3G external playing pitch as well as internal and roof level facilities. Further details on the proposed school facilities, and how community access for their use would be secured, can be found in the submitted DAS, prepared by Squire & Partners, and the OSPPA, prepared by Gerald Eve LLP.
- 14.18 The public realm and landscaping around the school itself would deliver an attractive public realm which operates as a functional space. In line with London Plan Policy G5, the proposed materials, planting and street furniture has been selected to match the required needs of the new spaces. The submitted DAS for Application B includes details on landscaping and public realm.
- 14.19 **Overall, the public realm and landscape proposals are in accordance with planning policy objectives, with the importance of delivering attractive, legible and accessible public and**

private spaces being recognised at all policy levels. In line with planning policy at all levels, the project team has taken a considered approach to landscaping and public realm and has sought to develop attractive spaces which are efficient and functional.

Urban Greening Factor

Planning Policy

14.20 Within the London Plan, urban greening is promoted and encouraged as a fundamental element of site and building design (Policy G5); major development proposals should also be designed to include roof, wall and site planting, especially green roofs and walls where feasible (also Policy G5). For developments which are predominantly residential, the Mayor recommends a target Urban Greening Factor (UGF) score of 0.4 and for those which are predominantly commercial, a target UGF score of 0.3 is recommended (Policy G5(B)).

Assessment

14.21 The Proposed Development has sought to maximise opportunities for greening across the Site. The Proposed Development will provide an abundance of the recommended typologies of planting and the proposed landscaping strategy will contribute significantly to a healthy and biodiverse environment for residents and visitors alike.

14.22 During the pre-application phase for the Applications and in response to the DRP comments received, dated 28 February 2022, the design team have rigorously tested the scheme to ensure that the UGF score has been maximised.

14.23 In line with London Plan Policy G5, Gillespies LLP have carried out UGF assessments across the Applications. The results are:

UGF Calculation	Result
Application A (total)	0.306
Application A – Development Area 1 (Detailed)	0.253

Application A – Development Area 2 (applied for in outline)	0.401
Application B (School)	0.224
Application B (School) – with green roof	0.245
Site Wide	0.286
Site Wide (with sports pitch grassed)	0.312

Table 15: UGF Scores for the Proposed Development

14.24 The submitted Masterplan Landscape DAS, prepared by Gillespies, sets out in detail how greening opportunities across the Site have been maximised, including:

- i. Hard scaped surfaces were preferred across the Site due to the wide variety and numbers of users expected at the Site, for example Thames Street, Bottleworks Square and Malting Plaza are all proposed to be hardscaped;
- ii. Planting has been maximised where pedestrian and cyclist circulation is not required. planting in all areas above the podium/basement has been specified for flower rich perennials and amenity grassland which have high UGF scores;
- iii. Extensive provision of biodiverse roofs across Application A. The total area for Development Area 2 (applied for in outline) is indicative at this and will be subject of a future Reserved Matters application, the detailed design process may lead to an increase in provision; and
- iv. Streets have been used for tree planting where possible and retention of existing mature trees where possible.

14.25 Gillespies have also set out the limitations in achieving the recommended target score, as follows.

- i. The commercial activities on Development Area 1 require extensive hardscaped areas for servicing, spill-out areas for cafes and restaurants and corridors of circulation;
- ii. Flexible hardscaped spaces such as Maltings Plaza and Bottling Square were essential in providing the stage for markets and events that will animate the new neighbourhood;
- iii. The school rooftop will provide playspace and essential plant equipment for the school building. The roof also includes skylights which provide natural light to the floor level below. At this stage, green roofs are not proposed, however an area where they could be provided has been shown indicatively on the submitted roof plan (ref: C645_Z3_P_RF_001 Rev B). The inclusion of the school green roof is subject to detailed design to be undertaken by the School Developer. The UGF calculations show that the inclusion of the roof would increase the UGF score at Application B from 0.224 to 0.245;
- iv. The school area also benefits from the inclusion of a 3G sports pitch and MUGA. These large areas of almost 0.9ha can only be counted as permeable surfaces and therefore have a low UGF score of: 0.1. Gillespies have reviewed the UGF score in the scenario that the sports facilities were grass pitches, this increases the Site wide UGF score to 0.312 from 0.286. However, this scenario is not possible to deliver on Site as it is a requirement of Sport England (a statutory consultee) that the sports pitches be all-weather surfaces. Furthermore, substantial public benefits will be derived from the provision of the 3G sports and MUGA, such as year-round access to sports facilities for school pupils and the local community, which are considered to outweigh any perceived 'harm' in terms of the Proposed Development not achieving the London Plan policy G5 recommended UGF target.

14.26 In terms of Development Area 1, although the UGF falls below the London Plan policy compliant level of 0.4 for residential-led schemes, the landscape strategy will provide in abundance most of the recommended typologies of planting, and will significantly contribute to a healthy and biodiverse environment for residents and visitors alike.

14.27 Development Area 2 benefits from being a residential area, including the community park. Development Area 2 exceeds the London Plan recommended UGF target, achieving 0.401.

- 14.28 **The UGF results across the Site are considered acceptable given that the London Plan policy sets out a recommended target and that it has been demonstrated within the submission that the Proposed Development has maximised opportunities to reach those recommended targets.**
- 14.29 The GLA's Hearing Report (paragraph 639) supports this assessment in respect of biodiverse roofs, stating that **"GLA officers are satisfied that the current quantum of green and brown roof provision has been suitably maximised..."**.

Playspace

Planning Policy

- 14.30 The London Plan Policy S4 states that development should 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.
- 14.31 Policy LP 31 in LBRuT's Local Plan states that new open spaces, play facilities and formal and informal land for sport and recreation should be linked to the wider Green Infrastructure network as they play an important role in creating social cohesion, encouraging and promoting healthier and more active lifestyles.

Assessment

- 14.32 The Proposed Development will provide a significant variety of playspace which will meet the needs of a range of age groups, as set out in the submitted Landscape DAS, prepared by Gillespies. Play elements and facilities are provided in a range of forms within the public and private realm, including through fenced playgrounds, unfenced but contained play spaces, topographic variation and play opportunities in the landscape and 'play on the way' elements within circulation spaces and public realm areas. The school play facilities (indoor and outdoor) would also be available for use by children as play facilities, via the Community Use Agreement which would secure community access to these spaces out of school hours.

- 14.33 Approximately 3,982 sqm playspace would be provided for the residential units within Development Area 1 which is significantly above GLA benchmark standards (which generates a need for 2,166 sqm playspace).
- 14.34 Development Area 2 is applied for in outline and subsequently, the exact playspace requirement cannot be calculated as the final mix is unknown. However, assumptions on likely mix have been made to ensure that the scheme can provide for sufficient playspace to meet, and where possible, exceed GLA playspace requirements. Overall Application A could provide 7,534 sqm of playspace, which is significantly above the GLA target of 5,480.7 sqm and just 8sqm below the LBRuT target of 7,542sqm. However, this total amount excludes the contribution that the school play facilities would make to providing local playspace – when factoring in a pro-rata approach to the school facilities which accounts for out-of-hours community use, the scheme could provide 16,854 sqm playspace, which is above the high LBRuT target.
- 14.35 **Based on the quantum and quality of playspace proposed, its location within the scheme and the range and variety of playspace types, including shared community use of the full size 3G football pitch, the Proposed Development provides appropriate playspace in line with London Plan and LBRuT expectations and requirements.**
- 14.36 It is worth noting that the GLA Hearing Report found that the masterplan playspace proposals were “**suitably extensive**” and that they accorded with London Plan Policy S4 and the Children and Young People’s Play and Informal Recreation SPG.

Green Space and Other Open Land of Townscape Importance

Planning Policy

- 14.37 The existing playing fields on the Site are designated as Other Open Land of Townscape Importance (‘OOLTI’). Local planning policies seek to protect OOLTI, but they also allow for re-provision of the space in particular circumstances. London Plan Policy G4(B)(1) also seeks to resist the loss of protected open spaces unless equivalent or better-quality provision is made reflecting local needs. Under Local Plan Policy LP 14, the Proposed Development meets the specified criteria for the consideration of the re-distribution of OOLTI.

Assessment

- 14.38 The existing playing fields would not be retained in their current form as the Proposed Development includes the provision of a new secondary school, with external sports and play facilities suitable for a school of this type and size. In place of the existing playing fields, the scheme would provide the new school (in part), the new school play facilities and a new community park. The existing facilities are not suitable for use by the new school and the proposed new facilities would be responding to the demand generated by the school, and they would also deliver substantial increased sporting benefits to the wider community. Further details are included within the submitted OSPPA, prepared by Gerald Eve LLP.
- 14.39 Elsewhere across the Site, the masterplan has sought to provide new, publicly accessible and open spaces throughout. Of particular importance is the new green link, which will provide a significant area of public green space. Providing this link was a key aspiration of the SBPB. Following consultation with the GLA, LBRuT and the local community, the green link was expanded and straightened throughout the design evolution stages – the resulting link now provides a large and welcome straight link from Mortlake Green to the riverside.
- 14.40 The submitted OSPPA, prepared by Gerald Eve LLP, assesses the acceptability of the loss of existing green space and OOLTI on the Site. The OSPPA concludes that the Proposed Development is acceptable in policy terms given the site-specific circumstances. It is noted that the Proposed Development would provide:
- a) A 62% increase of OOLTI qualifying open space when compared to existing (3.3 ha proposed compared to 2.06 ha existing);
 - b) A significantly greater quantum of OOLTI qualifying open space than envisaged by the SBPB;
 - c) The existing OOLTI space provides limited contribution to the local community (it is not publicly accessible), nor does it provide any other significant qualities (e.g. variety, landscape features, planting diversity, biodiversity etc). Conversely, the proposed dispersal of OOLTI space throughout the masterplan is a sound landscape approach, and one which would deliver high quality landscape throughout and benefits to the community;

- d) Much better quality OOLTI space than existing – the proposed OOLTI space would also be open and it would satisfy a greater range of OOLTI policy objectives than the existing space;
- e) 3.94 ha of publicly accessible open space (much of which is OOLTI qualifying), a significant increase when compared with the existing situation i.e. no publicly accessible space; and
- f) 4.83 ha (including towpath) / 4.54 ha (excluding towpath) of overall total amenity space would be provided throughout the development, which equates to 51% of the overall Site area.

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

14.42 It is noteworthy that the LBRuT Committee Report (paragraph 9.4.3) concluded that although the loss of the OOLTI was regrettable, policy does allow for re-distribution where a comprehensive approach to redevelopment is taken, provided this is at least equivalent value in terms of quantum, quality and openness. LBRuT agreed with the rationale provided by the Applicant for the re-provision of the OOLTI. The Committee Report went on to state that the scheme as a whole would **“provide realm, and provide permeability through the site and with other green networks. Many of such open areas are deemed to qualify as suitable OOLTI re-provision, and therefore accord with the aims of policy”**. The GLA report supports the proposed rearrangement of the OOLTI land stating that it represents an increase in the **“quantum, quality, functionality and accessibility of public realm and areas of open land across the site”** (paragraph 270).

Pedestrian and Cycle Connections

Assessment

14.43 As set out in Section 15 of this Town Planning Statement, planning policy at all levels recognises the importance of helping to enable pedestrian and cycle movement in encouraging a shift towards more sustainable modes of travel. The London Plan seeks for the public realm to

provide well-designed places for pedestrians and cyclists (Policy D8(E)). The SBPB echoes this and at paragraph 5.34 states that the **“Council will expect proposals to assess the potential to create new pedestrian routes and improve cycle provision both within the site and linking to existing routes in the area”**. Pedestrian links across the Lower Richmond Road, Mortlake High Street and along Sheen Lane are particularly important to help link the local area to the river and to the new facilities to be provided by any mixed-use scheme.

- 14.44 As set out within the submitted Landscape Design and Access Statement and the Transport Assessment, the Proposed Development includes the provision of a number of new pedestrian and cycle routes across the Site. The public realm has been designed to prioritise pedestrian movement but allowance has been made for appropriate sized cycle routes throughout the Site.
- 14.45 In terms of access to the Site, pedestrian and cycle access will be greatly improved. New pedestrian crossings will be provided within and to the Site, including a new pedestrian crossing from Mortlake Green to the Proposed Development and a new crossing further down on Lower Richmond Road which will help to provide safe and convenient access to the new school.
- 14.46 Currently, the Site provides no public access at all and acts as a barrier between Mortlake and the River. A key aspiration of the Proposed Development is to make the Site permeable and accessible. This would be achieved partly through the creation of new pedestrian and cycle connections to and throughout the Site, including new pedestrian crossing points along Lower Richmond Road. Enabling these modes of transport via a well-designed public realm is in accordance with strategic planning priorities to encourage more sustainable modes of travel.

Towpath

Assessment

- 14.47 The existing towpath, which runs in an east-west direction along the northern boundary of Application A is outside the ownership of the Applicant; the PLA and LBRuT have control over this land. It is included within the Application A red line boundary to ensure delivery of agreed towpath works and as the SBPB specifically seeks any development to upgrade the existing towpath.
- 14.48 The project team engaged in pre-application discussions with the PLA, LBRuT and local interest groups regarding the extent of proposed works to the towpath as part of the Original

Applications. The proposed works remain unchanged under this Application and therefore the consultation undertaken previously is considered to remain relevant and valid.

- 14.49 There is a desire for works to the towpath to remain minimal to preserve the current character of the route and therefore the scheme proposes minimal enhancement of the existing towpath. The works will include new paving, seating, planting and riparian life-saving equipment. It is proposed that principle of these works be secured via legal agreement, with PLA agreement. Aside from enabling works to be carried out to the towpath, the Applications do not propose any alterations for public access to the towpath. Further details can be found within the submitted Landscape DAS, prepared by Gillespies.
- 14.50 These towpath works, along with the development of the Riverside Terrace and general opening up of the Site to enable access to the riverside, is in line with the aims of LBRuT's Local Plan Policy LP 18 which requires all development proposals alongside or adjacent to river corridors to retain and enhance existing public access to the riverside and provide new public access to the riverside and foreshore where possible.
- 14.51 Works to upgrade the existing public towpath are proposed, which have been agreed in principle with the PLA and would be secured via legal agreement. These works would retain the character of the existing towpath and meet the aspiration of the SBPB. In conjunction with the public realm aspiration to open connections to the river, the scheme complies with Local Plan Policy LP 18.

Trees

Planning Policy

- 14.52 The NPPF aims to enhance biodiversity and states that planning permission should be refused for development which results in the loss or deterioration of irreplaceable habitats unless the need for, and benefits of, the development in that location clearly outweigh the loss (paragraph 180 (c)). This reflects London Plan Policy G7(I) which 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 Policy is also clear that the planting of additional trees should generally be included in new developments.

14.53 Through Local Plan Policy LP 16, LBRuT require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.

Assessment

14.54 To facilitate the comprehensive redevelopment of the Site, some existing trees would need to be removed to enable construction of the new buildings and spaces on Site. The design team has strived to keep disruption to trees to a minimum, and this has influenced the siting and design process. A detailed Arboricultural Survey Report and Impact Assessment (AIA) has been prepared by Waterman IE and sets out what existing trees will be removed and why their removal is necessary, how retained existing trees would be protected during construction and some details on the new proposed trees. Details are also included within the submitted Landscape DAS.

14.55 As demonstrated in the AIA and summarised in table 16 below, at this stage, 50 trees are proposed to be removed out of a total of 152 trees, tree groups and hedgerows which have been surveyed (some of which are outside of the red line boundaries) – this equates to 32.8%. The exact number to be removed will be confirmed at detailed design stages. As set out within AIA, the removal of 50 trees is required to facilitate the construction of the Proposed Development and/or to facilitate the delivery of the proposed hard and soft landscaping design. The majority of trees to be removed are internal trees within the Site and valuable boundary trees would be retained. In addition, up to 404 new trees would be planted across the Site (including at Chalkers Corner), resulting in a net increase of up to 65% cover.

Category (High to Low)	Existing	To be removed	To be retained	To be planted
A (highest quality)	22	2	20	
B	56	24	32	

C	58	18	40	
U (lowest quality)	16	6	10	
Total	152	50	102	Up to 404²

Table 16: Tree Schedule

- 14.56 Paragraph 8.5 of the AIA sets out that a further three trees will be removed as a result of the proposed highways works, 1 at Chalkers Corner and 2 will be removed as they would impact the proposed zebra crossing on Mortlake High Street.
- 14.57 A tree planting strategy has been included within the submitted Landscape Design and Access Statement. A range of new species would be introduced at the Site, and the species have been selected to respond to their proposed new locations e.g. trees along the streets would be predominately native species with columnar canopies, allowing trees to be situated in close proximity to the building massing and thereby providing shade and shelter from wind and giving seasonal interest in leaves, bark and form. Different tree species would also be selected for their biodiversity and ecological benefits. The tree selection has been informed by LBRuT's greenspace guidance as set out within the Public Space Design Guide (2006). A number of the new trees to be planted would be semi-mature.
- 14.58 **To deliver a comprehensive mixed-use development on the Site, some trees would need to be removed. Most trees on Site would be retained and protected during construction. To mitigate against tree removal, up to 404 new trees are proposed to be planted across the Site representing up to a 65% increase in tree cover. The new trees would be a mix of species to respond to their locations and provide ecological and biodiversity benefits, and a number would be planted at semi-mature age. It is therefore considered that the proposed loss of trees is acceptable. It is worth noting that LBRuT found the proposed tree strategy acceptable in respect of the Original Applications (Committee Report, paragraph 7.4.17).**

² High quality specification trees will be planted. Due to size, the proposed trees cannot be graded.

15 Transport, Parking, Construction and Servicing

- 15.1 **A comprehensive approach has been taken to traffic, transport and all highway-related matters, and the relevant submission documents have considered the scheme in its entirety, i.e. Applications A and B. The impact of the scheme in all relevant highways and transport aspects is acceptable in line with planning and transport policy, and the aims of the SBPB.**
- 15.2 The Mayor of London specifically stated when determining the Original Scheme that the transport mitigation works were sufficient and accepted.

Transport Strategy Overview

- 15.3 One of the key requirements of the SBPB (and reflected, generally, in planning policy at all levels) is that the scheme should deliver the necessary transport and highways works to mitigate any adverse transport and parking impacts on the transport network. The design team and the transport consultants, Stantec, have worked together closely throughout the design process to develop a scheme which achieves this aim. Broadly speaking, this has been achieved through two means, set out as follows:
- a) Through highways mitigation measures and a careful approach to car parking / delivery and servicing / construction works; and
 - b) Through implementing means which would encourage sustainable modes of travel to and from the Site, thereby reducing impacts on highways.
- 15.4 The overall transport strategy has been developed in close conjunction (and from a very early stage in the process) with LBRuT's highways officers and TfL, as well as with other relevant transport bodies and local groups. Most recently, the Applicant met with the LBRuT planning and transport officers on 3 December 2021.
- 15.5 In line with the requirements of London Plan Policy T4, LBRuT Local Plan Policy LP 44, a Transport Assessment has been prepared by Stantec which accompanies the planning applications and sets out the transport strategy in full detail. The Applications are supported by various other transport related documents including:

- a) The Transport and Access Chapter of the ES (Chapter 8), prepared by Stantec;
- b) A Transport Assessment, prepared by Stantec which includes:
 - i. A Framework Delivery and Servicing Plan;
 - ii. Car Park Management Plan;
 - iii. Draft Framework Travel Plan;
 - iv. Draft Residential Travel Plan; and
 - v. Draft School Travel Plan.
- c) Operational Waste Management Strategy, prepared by Stantec;
- d) A Framework Construction Management Statement, prepared by AECOM; and
- e) A Site Waste Management Plan, prepared by AECOM.

15.6 Collectively, the assessments and documents set out in paragraph 15.5 above address all key material considerations relating to transport and highways matters, for all stages of the Proposed Development.

15.7 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable (paragraphs 104(c) and 112(a)). Mixed use schemes are encouraged where these can assist in minimising journey lengths (paragraph 106).

15.8 The London Plan also prioritises sustainable transport methods and encourages development to be located in sustainable locations to help reduce vehicle trips. As part of the Mayor of London's Healthy Streets Agenda, development should provide effective public transport, including solutions to encouraging walking and cycling (London Plan Policy T2).

15.9 LBRuT policy echoes these aspirations, requiring development not to have a severe impact on the operation, safety or accessibility to the local or strategic highway networks (Local Plan Policy LP 44).

- 15.10 These policy aspirations towards a more sustainable transport system have formed the basis of the overall transport and highways approach for Site. This section assesses the impact of the scheme upon highways; parking; sustainable travel; delivery; servicing and waste; and construction.

Parking

Car Parking

Planning Policy

- 15.11 The London Plan seeks to strike a balance between promoting new development and providing excessive parking that can undermine the strategic sustainable transport priorities. Provision should be made for electric vehicle parking, disabled parking and for delivery and servicing.
- 15.12 The London Plan sets out maximum parking standards at table 10.3 and for the Site (PTAL 2, Outer London), the maximum parking standard is up to 1 space per unit. These standards are in line with LBRuT's parking standards as set out within Appendix 3 of the Local Plan. Associated Local Plan Policy LP 45 requires developments to provide adequate parking to meet the needs of the development. Unacceptable impacts on on-street parking and local traffic conditions should be avoided.

Assessment

- 15.13 It is proposed to provide car parking for the Proposed Development at basement level, with a small number of spaces for the school and the townhouses provided at grade. Two basement car parks would be provided – one to the east of Ship Lane within Development Area 1 and one to the west of Ship Lane within Development Area 2. Further detail on the proposed car park access and layout can be found in the submitted Design and Access Statement and Transport Assessment (Parking Management Plan).

15.14 Table 17 sets out the location and number of car parking spaces by use:

Use	Total Car Parking Spaces	Location of Car Parking Spaces
Residential Development (Development Area 1)	330	Basement level within Development Area 1, accessed from Ship Lane (east) and Mortlake High Street
Non-residential (Development Area 1)	78	Basement level within Development Area 1, accessed from Ship Lane (east) and Mortlake High Street
Residential (Development Area 2)	93	Basement level within Development Area 2, the majority is accessed from Ship Lane (west), with parking for the townhouses (blocks 20 and 21) provided at grade. These parking spaces would cater for the residential units within blocks 13, 16 and 17, with details confirmed in due course via Reserved Matters submissions
School	15	At grade directly outside the school entrance, accessed from the new access road via Lower Richmond Road
Total	516	

Table 17: Proposed car parking numbers and location by use

15.15 The level of car parking proposed was discussed extensively with TfL, LBRuT and local community groups during the Original Applications. The Applicant has sought to achieve a balance between providing sufficient car parking to meet the needs of the development, whilst not providing excessive car parking which could increase traffic congestion in the local

area. For residential uses, the overall parking ratio is approximately 0.39 parking spaces per unit. This is well within the London Plan standards for a development in Outer London which has a maximum permitted parking ratio of 0.75 for a PTAL 2-4 and is in accordance with the LBRuT's parking standards. A total of 3% of residential bays have been provided as disabled bays from the outset, with the provision for an increase of up to 7% of bays to become disabled bays should they be required in the future. The submitted Car Park Management Plan has also tested the scenario of the 7% residential units requiring disabled car parking and has shown that these can be accommodated with the loss of 7 car parking spaces. 10% of the non-residential parking bays will be provided for disabled parking from the outset. In addition, 20% of car parking spaces will be provided with active electric charging provision, and 100% of the remaining spaces will be provided with passive electric charging provision, in line with London Plan Policy T6.1.

- 15.16 As set out within the Transport Assessment, the development proposals would provide a mix of local facilities, the Site has access to public transport connections (some of which would be improved through the development) and measures would be implemented to reduce car usage. The proposed parking numbers would provide for the needs of the development, in line with LBRuT Local Plan Policy LP 45.
- 15.17 Disabled ('Blue Badge') parking and electric vehicle charging points would be provided, in accordance with London Plan and Local Plan policy requirements.
- 15.18 With respect to existing on-street parking, the necessary highways works would result in a loss of parking spaces along Lower Richmond Road. The Proposed Development will instate 20 car parking spaces along Williams Lane which will include 20% EVCs and the 100% passive EVC provision.
- 15.19 The Transport Assessment concludes that the impact of the Proposed Development on local on-street parking is acceptable. Notwithstanding this, the introduction of a Controlled Parking Zone ('CPZ') would have additional benefits for the local area, although the introduction of a CPZ is not necessary to make the development acceptable in transport terms. As set out in the Transport Assessment, inclusion of a CPZ would help to alleviate any parking stress that the development may generate, which is largely because of the new school.

- 15.20 Whilst a CPZ would be desirable, it is not essential. Introducing a new CPZ would be subject to a separate consultation process which would be led by LBRuT and therefore whilst funding could be secured, it cannot be guaranteed that one would be provided as part of the Proposed Development.
- 15.21 **A balanced approach has been taken toward the provision of on-site parking. The Proposed Development aims to provide sufficient parking to accommodate the day-to-day requirements of the development without providing an oversupply which would promote increased traffic generation. This is in accordance with London Plan Policy T6.1 and LBRuT Local Plan Policy LP 44.**

Cycle Parking

Planning Policy

- 15.22 Both the London Plan and LBRuT's transport planning policies require development to provide cycling facilities. London Plan Policy T5 states that these must be secure, fit for purpose and well-located and that on-site changing facilities and showers should also be provided (paragraph 10.5.7). LBRuT also require adequate cycle parking (Local Plan LP 44). The Local Plan adopts the same cycling parking standards as set out in Table 10.2 of the London Plan. The Site is located within an area of 'higher minimum parking standards' as per Figure 10.3 of the London Plan. The scheme provides cycling facilities throughout, in line with the London Plan standards.

Assessment

- 15.23 Application A would provide a total of 2,248 long stay cycle parking spaces and 270 short stay cycle parking spaces for the residential and non-residential uses. This is significantly more than the London Plan required provision of 2,104 long stay and 222 short stay cycle parking spaces. Parking will be provided within secure locations within the basement and designed in accordance with the principles as set out in the London Cycling Design Standards. A cycle hub would be provided which will provide shower and changing facilities. A minimum of 25% of Sheffield stands are proposed in each cycle parking store, 5% of the Sheffield stands will be spaced at 1.8m for oversized and accessible cycle parking. For the school (Application B), a total of 165 long stay cycle parking spaces would be provided alongside 14 short stay spaces. In both cases, the Proposed Development would provide the London Plan required

cycle parking space numbers for the school, with an overprovision of 1 short stay cycle parking space.

Taxi Parking

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

Coach Parking

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

Sustainable Transport Initiatives

- 15.27 In line with national (NPPF paragraph 104), London Plan (Policy T2) and local strategic planning objectives (Local Plan Policy LP44), the scheme seeks to maximise opportunities to support and encourage sustainable transport modes. These opportunities include encouraging cyclists and pedestrians and public transport.

Buses

Planning Policy

- 15.28 London Plan Policy T3 seeks to ensure that sufficient bus infrastructure is provided within developments.

Assessment

- 15.29 Stantec have carried out extensive consultation with TfL and LBRuT regarding how the Site would be accessed by buses, and how the additional trips generated from the new school and other land uses would impact on existing bus capacity.
- 15.30 It has been agreed by all parties that the scheme would generate demand for additional bus capacity, and this has been factored into the wider trip generation assessment for the development. The greatest driver for additional bus demand is the new secondary school; the other land uses generate only a modest increase on bus demand.
- 15.31 Currently, TfL's wider plans for bus routes and capacity in the local area are under review and will not be confirmed until more clarity has been provided on the Hammersmith Bridge works. Therefore, a worst-case scenario has been generated and a financial contribution would be secured from the Applicant/school provider which would support enhanced capacity for local buses.
- 15.32 Due to the uncertainty surrounding exactly how this additional capacity would be delivered, TfL has requested that an area of land be secured within the Applications which could provide a bus turnaround facility. Although the need for a bus turnaround facility is not necessarily generated by the development itself – TfL has confirmed that this would likely provide benefits for the wider local area, with need arising from the development and increased capacity requirements in the local area. The Applications do not seek permission for a bus turnaround – this is shown only indicatively on the plans and would not be able to be delivered without a separate application and consultation process. This approach enables flexibility should such a facility be required. At such a time, discussions can progress between TfL and LBRuT and if deemed appropriate, the relevant planning application would be brought forward.
- 15.33 The scheme also proposes the re-location of bus stops and bus stands around the Site to allow for new access points and crossings. Where amendments are proposed to existing bus infrastructure, care has been taken to ensure safe and effective interchanges with other road users, including pedestrians and cyclists, in line with Local Plan Policy LP 44.
- 15.34 The scheme would accommodate for additional bus capacity via financial contributions. This would enable school children, residents, visitors and employees to travel to and from the Site

via bus, thereby encouraging more sustainable modes of travel. Land for a bus turnaround would also be safeguarded, should TfL and LBRuT seek to bring this forward in due course via a separate application and consultation process.

Highways Impacts

- 15.35 As set out within the Transport Assessment, when the brewery was operational, a number of daily trips were made in association with the brewery use. The Proposed Development would result in an increase in the number of vehicle trips to and from the Site, and these are presented within the Transport Assessment.

Planning Policy

- 15.36 London Plan 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

- 15.37 A number of highways works are proposed to mitigate the development's impact on the local highway network. These works include the following:

a) 'Chalkers Corner Light' works. This involves adding 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 landscaping corridor.

b) Works to Mortlake High Street, including moving bus stands and introducing a new crossing point, narrowing of traffic lanes and introducing measures to help manage the speed of traffic and to give greater priority to pedestrians and cyclists (including introducing a 20mph zone, details of which would be agreed post determination);

c) Works at the mini roundabout between Mortlake High Street, Lower Richmond Road and Sheen Lane, introducing measures to increase capacity for vehicles west to east; and

d) Re-locating existing bus stops to better suit pedestrian movements, introducing a new bus stop clearway and removing a bus stop.

15.38 All necessary highway works affecting adopted highway land (aside from those affecting Williams Lane and Ship Lane, which are within the Application red line boundary) would be delivered via a section 278 agreement, secured in the section 106 legal agreement associated with any planning permission for Applications A and B.

15.39 **The Proposed Development includes appropriate highways and transport measures to mitigate the impacts of the development on the local highway network and to prioritise the movement of pedestrians and cycles between the Site and Mortlake Station. This is in accordance with strategic transport planning principles.**

Rail

15.40 Stantec's Transport Assessment considers the impact of the Proposed Development upon rail services into and out of Mortlake rail station. The assessments carried out indicate that there is sufficient capacity for both the existing and forecasted future passenger numbers in terms of station infrastructure and train capacity.

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

Pedestrian and Cycling Connections

15.42 The scheme would result in an increase in pedestrian and cyclist numbers, both from visitors and new residents. Enabling effective pedestrian and cycle routes to and through the Site has been a key design aspiration, in line with London Plan and Local Plan policy

15.43 As set out within the submitted Transport Assessment, highways works and new pedestrian crossings would facilitate improved pedestrian and cycle access to and from the Site, in line with Policy LP 44. The submitted Landscape DAS, prepared by Gillespies, sets out how the landscaping design approach has sought to maximise pedestrian access and circulation and encourage cycling. Enabling positive public connections and opening up the Site for public access has been a key aim of the masterplan – in particular, the scheme would deliver a large new green link from Mortlake Green to the riverside, and riverside access would be increased, with the provision of new public spaces and pedestrian routes. Streets, paths and

open spaces have been designed to provide safe pedestrian access and cyclist access, where relevant.

- 15.44 With respect to the level crossing on Sheen Lane, Stantec have carried out a detailed assessment of how the additional pedestrian trips generated by the development would impact on the crossing's capacity. It is concluded that even with the additional forecasted trips, there will only be a modest impact upon the level crossing. In particular, the footbridge appears to have sufficient capacity to accommodate additional demand, and the width of the pedestrian crossings appear sufficient to meet guidelines both now and in the future with the additional trips generated by the development. Notwithstanding this, the Transport Assessment does set out a series of recommendations for how the level crossing and station infrastructure could be improved. These would need to be delivered by Network Rail and other landowners as appropriate. These would not need to be delivered as part of the Stag Brewery masterplan as no need for these works is generated.

Travel Plans

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

Car Club

Planning Policy

- 15.47 Both the London Plan (Policy T6.1) and LBRuT's Local Plan (paragraph 11.2.5) recognise the role that car share facilities and car clubs can have in reducing vehicle trips and therefore minimising the impact of car-based travel on local highway networks and the environment.

Assessment

- 15.48 It is anticipated that Car Club spaces could be provided on Ship Lane.
- 15.49 **A range of sustainable travel initiatives are proposed which would help in achieving the strategic transport aims of the NPPF and the London Plan. Travel Plans would be secured and funded to assist in maximising sustainable travel opportunities across the Site.**

Waste and Servicing

Planning Policy – Construction Waste

- 15.50 London Plan Policy SI 7(5) sets targets for the Mayor, waste planning authorities and the industry to meet or exceed in respect of construction waste and material. Part a) states that for construction and demolition, 95% should go to reuse/recycling/recovery and part b) states that for excavation materials, 95% should go to beneficial use.
- 15.51 Local Plan Policy LP 24 states that all major developments should submit a site waste management plan (SWMP).

Assessment – Construction Waste

- 15.52 In line with Local Policy LP 24, a SWMP, prepared by Aecom, has been submitted in support of the Applications.
- 15.53 The SWMP demonstrates that approximately 70% of non-demolition waste and 80% of demolition waste is anticipated to be diverted from landfill.

- 15.54 Aecom conclude that the Proposed Development will either meet, or contribute towards meeting, the London Plan target that 95% of all construction, demolition and excavation water material be diverted from landfill.

Planning Policy – Operational Waste

- 15.55 The London Plan states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. (Policy T7). Part J of the same policy requires development proposals to consider the use of rail/water for the transportation of material. Part H states that developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or nighttime. Deliveries should be consolidated where possible (paragraph 10.7.2).
- 15.56 LBRuT supports the objectives of sustainable waste management and seeks to maximise self-sufficiency in waste management and minimise waste creation. Local Plan Policy LP 24 states that waste should be managed in accordance with the waste hierarchy – reduce, reuse or recycle waste as close as possible to where it is produced. LBRuT’s ‘Refuse and Recycling Storage Requirements’ SPD (2015) sets out detailed guidance and requirement for waste management.

Assessment – Operational Waste

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

Planning Policy - Servicing

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

Assessment -Servicing

- 15.59 A Framework Delivery and Servicing Plan (FDSP) has been prepared by Stantec and submitted in support of the Applications. As with the waste strategy, detailed strategies have been set out for Application A – Development Area 1 and the school (Application B). The strategy for those elements in detail (Application A – Development Area 2) has been set out at a high level, but the details would be confirmed in due course via future submissions. The Management Plan sets out that wherever feasible, delivery and servicing trips would be minimised. For the uses to the east of Ship Lane (Development Area 1), deliveries would try to be co-ordinated, to minimise vehicular trips and vehicular disruption. Adequate servicing space has been designed into the detailed elements of the scheme to accommodate the necessary delivery and servicing vehicles.

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

Construction*Assessment - Site Wide Construction*

- 15.61 As set out in Section 4 of this Town Planning Statement, the development would be carried out in phases. Due to the extent and nature of works, construction traffic has been carefully considered by the project team and a Framework Construction Management Statement, prepared by Aecom has been prepared which responds to the requirements of LBRuT Local Plan Policy LP 10. It provides details of how the construction process would be managed to protect neighbour amenity and local transport networks.

- 15.62 The Framework Construction Management Statement (FCMS) sets out measures for how the impact of construction vehicle trips to and from the Site can be reduced. It is proposed that a detailed Construction Environmental Management Plan (CEMP) would be prepared post-determination of the Applications and secured through planning condition – this would be based on the high-level information provided within the submitted FCMS and would detail relevant environmental management controls necessary for environmental protection during construction.
- 15.63 Chapter 8 of the submitted ES sets out the transport impacts of construction waste and trips on the local highway network. It concludes that the impact of the construction works would be insignificant.
- 15.64 Both the London Plan (Policy T7) and LBRuT's Local Plan (Policies LP 24 and LP 44) encourage the use of the River Thames where relevant for freight. The project team has carefully considered the possibility of using the river for construction waste during the construction period. However, several significant constraints have been identified in respect of river use, including the highly tidal nature of the river in this location, the significant use of the river in this location (rowing clubs and leisure users) and the poor quality and condition of the wharf and river wall. Further details are included within the FCMS, prepared by AECOM and Chapter 4 of the ES, prepared by Waterman IE.

Assessment - Interim Works – Application B (School)

- 15.65 As well as the co-ordinated plans for the whole of the Site, given the flexibility to bring forward the school or the mixed-use scheme independently, interim plans have been prepared which set out the physical works associated with the interim state for bringing forward either the school (Application B) or the mixed use scheme Application A) on its own.
- 15.66 Plans have been submitted in support of Application B which detail the interim works. Reserved Matters associated with the elements applied for in outline of Application A would include permanent works to supersede any approved / implemented interim works on the school site. Further details can be found within the submitted Transport Assessment and the Application B Design and Access Statement.
- 15.67 **Documents have been prepared which set out how the construction of the works would be carried out, and how vehicular trips and construction methods would be managed to**



protect neighbour amenity and the local highway network. It is proposed that further detailed construction plans would be controlled via condition.

16 Heritage and Townscape

Above Ground Heritage

Legislative Background and Planning Policy

- 16.1 The statutory requirements for planning applications which affect statutorily designated heritage assets, including listed buildings and conservation areas, or their setting, seek to ensure that special regard is given to the desirability of preserving the asset or its setting, character, appearance or any features of historic interest which it possesses (Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990).
- 16.2 The Government attaches great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposal would cause to the significance of the heritage asset. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm shall be weighed against the public benefits of the proposals (NPPF paragraphs 200 and 202).
- 16.3 In addition to the NPPF, further supplementary guidance on conserving and enhancing the historic environment is provided in the PPG. Paragraph 9 states that the ‘significance’ of a heritage asset and the contribution of its settings, is very important to understanding the potential impact and acceptability of proposals.
- 16.4 At a strategic and local level, planning policies require development to retain and enhance historic assets. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate with regeneration schemes making use of heritage assets (London Plan Policy HC1). 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.
- 16.5 This section assesses the Proposed Development in terms of heritage against the relevant statutory tests and adopted planning policy at all levels.

Site Context

- 16.6 In light of the above legislative and policy summary, the heritage context for the Site is as follows:
- a) Conservation Areas: Partly within the Mortlake Conservation Area and directly opposite the Mortlake Green Conservation Area.
 - b) Listed Buildings: There are no listed buildings on the Site but there are a number of Grade II listed buildings along the Thames Bank, as well as a Grade II listed gateway on Williams Lane and the Garden Wall to the east of Number 1 to 8 Riverside House and extending behind Numbers 1 to 24 Reid Court is Grade II listed. The Grade II Chiswick Bridge is also located within the vicinity of the Site.
 - c) BTMs: Three BTMs are located on the Site (the Maltings Building, the Former Bottling Building and Former Hotel Building) which are identified in the SBPB as contributing in varying degrees to the Mortlake Conservation Area (paragraph 2.10). There are also a number of BTMs located close to the Site (including the Ship Public House and a number along the Thames Bank, the Jolly Gardeners Public House and a number along the Lower Richmond Road).
 - d) Other non-designated heritage assets: There are some non-designated heritage assets on the Site which comprise the northern, eastern and southern boundary walls, railway tracks, granite paving and river moorings, memorials and historic gates.
- 16.7 The submitted Built Heritage Statement, appended to Chapter 15 of the ES, prepared by Waterman IE, sets out the history of the Site. The Built Heritage ES chapter assesses the significance of designated and non-designated heritage assets on and near to the Site, on a scale of significance, and then assesses the impact of the Proposed Development on these heritage assets. This impact is summarised below.
- 16.8 The Built Heritage Statement sets out that the majority of the historic brewery on the Site was demolished in the latter half of the twentieth century, leaving only three intact structures and boundary walls. These buildings have value in their own right and are the main contributing factor to the Site's heritage significance and its contribution to the setting of other nearby

heritage assets. The Statement concludes that twentieth century development has had a considerable negative effect on the built heritage significance within the Site.

Listed Buildings (Designated heritage assets)

- 16.9 Chapter 15 of the ES assesses the impact of the Proposed Development on the listed buildings along the Thames Bank, the listed gateway on Williams Lane and Chiswick Bridge. It is concluded that the existing modern brewery structures on Site detract from the appreciation of the heritage assets.
- 16.10 In his determination of the Original Applications, the Mayor considered that the previous design behind the listed buildings along the Thames Bank caused less than substantial harm that was not outweighed by the public benefits to be delivered by the Original Applications. In direct response to this decision, the design team have reviewed the design and have reduced the height, bulk and massing in this area of the masterplan. Buildings 20 and 21 are now 3 storey townhouses and are set back from the northern boundary of the Site in comparison to the previous design. Waterman IE have assessed this area of the Site and have found that the Proposed Development would **'be an enhancement when compared to the existing situation'** and the new built form would **'complement the appreciation of the heritage assets'** (ES Chapter 15, paragraph 15.107). The Proposed Development would also be in-keeping with the scale of development that would have existed historically along the riverfront.
- 16.11 Moreover, Waterman IE consider that the Proposed Development would **'likely give rise to insignificant to long-term, local, beneficial effects of minor significance to the heritage significance of the listed and locally listed buildings on Thames Bank'** (ES Chapter 15, paragraph 15.107).
- 16.12 With regard to Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is concluded that architectural and historic interest of the listed buildings would be preserved and enhanced. The proposed works will enhance the setting of nearby listed buildings through the removal of the majority of the existing brewery buildings and the design and scale of the new built form. This complies with LBRuT Local Plan Policy LP 3.

Conservation Areas (Designated Heritage Assets)

- 16.13 The Built Heritage Statement concludes that the surviving elements of the historic brewery on the Site make a positive contribution to the Mortlake Conservation Area. The remainder of the Site is not considered by Waterman IE to contribute and the modern brewery structures within it detract from the appreciation, character and appearance of the Conservation Area. Therefore, the proposed works would be an enhancement when compared to the existing situation and that they would not compromise the Conservation Area's relationship with the positive elements of its setting.
- 16.14 With respect to the Mortlake Green Conservation Area, the Statement sets out that the Site is not considered to contribute to the particular significance of the Conservation Area and that the modern structures detract from the appreciation of the area. Some elements, such as the Former Hotel Building and the sports ground do complement the character and appearance of the Conservation Area. Waterman IE conclude that the positive elements of the Conservation Area's setting would be sustained, and that the high-quality architecture of the proposed new development would lead to a long-term, local, beneficial effect of minor significance on the heritage significance of Mortlake Conservation Area and heritage assets contained within it due to a change in setting.
- 16.15 With regard to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is concluded that the character and appearance of the Mortlake Conservation Area and Mortlake Green Conservation Area would be preserved and enhanced. A number of existing structures on Site, which are considered to detract from the appreciation of the Conservation Areas, would be removed and new high-quality architecture would be brought forward. This complies with LBRuT Local Plan Policy LP 3.

Buildings of Townscape Merit (Non-designated heritage assets)

- 16.16 The Built Heritage Statement (ES Appendix 15.1) sets out that the main points of interest for the Former Hotel Building and Former Bottling Building are their façades. The Former Hotel Building's curved façade provides a townscape role in defining the street corner and historically would have formed a prominent entrance into the brewery site. The Former Bottling Building is identified within the Mortlake Village Planning Guidance as having local historical and architectural importance mainly due to its façade. Internally, both buildings have been altered but there are still some original elements remaining.

- 16.17 It is proposed to demolish the Former Bottling Building and Former Hotel behind retained principal facades (fronting Mortlake High Street and Lower Richmond Road). Two new buildings would be constructed behind, which would accommodate flexible use space, offices, a hotel (up to 15 beds) and residential units. The hotel use would be created within the Former Hotel Building, which, as set out within the submitted ES, would enhance the understanding and appreciation of the building's heritage value through re-introduction of the building's former use. This would better reveal the building's significance in comparison to the existing situation.
- 16.18 Waterman IE consider that the proposed works to the Former Hotel Buildings would have a minor adverse impact as its character would be different, albeit with certain key features retained which allows it former use to be understood. The re-use of the building as a hotel would provide a beneficial impact. Overall, this would result in an **insignificant to direct, permanent, local, adverse** effect of **minor significance** on the heritage significance of the former Hotel building.
- 16.19 Waterman IE consider that the proposed works to the Former Bottling Building would have a minor adverse impact as the building's architectural character would be different, albeit with certain key features retained which allows it former use to be understood. It is considered that there would be an **insignificant to direct, permanent, local, adverse** effect of **minor significance** on the heritage significance of the locally listed building.
- 16.20 As identified within the SBPB, the Maltings Building is an important local landmark (paragraph 2.12) which contributes to the significance of the Conservation Area. The surviving structure represents only part of the building originally constructed and the eastern elevation has been re-built following demolition of kilns and malting bins that were located on the eastern side of the structure. Internally, the floors are no longer present but some of the internal structure remains. Externally, the Built Heritage Statement finds that the building retains its historic character and industrial appearance and features that contribute to its evidential and aesthetic values.
- 16.21 It is proposed to retain the Maltings building in its entirety, although significant works are proposed to the interior space, largely to bring the building back into use. The building will be converted into residential apartments with ground floor flexible use space. Externally, works will include replacing existing windows, insertion of new windows in existing blind openings and the elongation of several windows on the north, east and west elevations. A new large,

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

- 16.22 The setting of the Maltings building is being fully respected. As a result of DRP feedback and design team review, buildings 2, 3 and 7 have been reduced by one storey to ensure that the Maltings can be celebrated and retains its river frontage prominence.
- 16.23 Overall, the Built Heritage ES Chapter (15) concludes that the permanent works to the Maltings building would result in a combination of beneficial and adverse impacts. The heritage asset would be retained and reused, and while this requires the alteration of the building, overall its architectural value would be retained. The historic value would decrease, however, as it would not be used for its primary original function. Overall, Waterman IE have judged that the proposals would have a minor adverse, with an **insignificant to direct, permanent, local, adverse** effect of **minor significance** on the heritage significance of the Maltings building.
- 16.24 The Built Heritage Chapter has also considered the impact of the proposed works on the Jolly Gardeners Public House, a designated BTM (albeit not within the Site boundary). The Chapter concludes that the Proposed Development would not diminish the Jolly Gardener's relationship with Mortlake Green and that, overall, there would be an insignificant to long-term, local, beneficial effect of minor significance on the heritage significance of the Jolly Gardeners Public House.

Other non-designated heritage assets

- 16.25 The Built Heritage Statement assesses the significance of the existing boundary walls and concludes that some sections are of neutral heritage significance with the majority of the retained walls to be considered of low heritage significance. This is partly because the walls provide evidence of historic structures that previously existed on the Site, with blind windows indicating the former locations of these buildings.
- 16.26 It is proposed to demolish the majority of the boundary walls and retain a section within the northeast corner of the Site. The Built Heritage ES Chapter concludes that the proposed works to the boundary walls would see a reduction in the historic value, with a minor adverse impact. Therefore, it is considered that there would be an insignificant to direct, permanent, local,

adverse effect of minor significance on their heritage significance. The retention of a small section of wall would allow an understanding of the former function and industrial history of the Site. Removing some of the boundary walls is considered acceptable by the SBPB which recognises that the walls currently create a physical barrier to the Site. Retaining these boundary walls would not enable the Site to be opened up and create meaningful and useful links through to Mortlake Village, the Green and the River.

- 16.27 The Site includes some sections of surviving historic railway tracks, granite paving setts and timber river moorings. These elements assist in an enhanced understanding of the former use of the Site and the link between the former Stag Brewery and the River Thames. It is proposed to retain these features in-situ. The proposed works to these elements have been found to have direct, long-term, local, beneficial effect of minor significance.
- 16.28 The existing memorial plaques and gates are also considered to be significant. NPPF (paragraph 198) states that LPAs should have regard to the importance of retaining historic plaques and memorials in situ and, where appropriate, explaining their historic and social context rather than removal. The existing memorial plaques and gates will be retained within the Proposed Development albeit, re-located. As none of these elements exist within their original context, it is considered that their re-location would not compromise their heritage value and their relocation has been assessed by Waterman IE to have an insignificant impact on the heritage significance of the memorials and the historic gates.
- 16.29 The effect of the Proposed Development upon the un-designated heritage assets has been considered. The heritage Chapter of the ES (Chapter 15) concludes that the Proposed Works would have insignificant to direct, long-term local, adverse of minor significance to long-term beneficial effects of minor significance on the assets. The works would retain the principle façades of the Former Bottling Building and Former Hotel, the Maltings Building, a section of the boundary wall and other non-designated heritage assets. The retention of these elements helps to understand the history of the Site and enhances the proposed works. This is in accordance with LBRuT Local Plan Policy LP 4.

Planning Policy – NPPF Tests

- 16.30 The NPPF outlines the requirement to assess the magnitude of harm on the historic environment resulting from a development. Paragraph 200 states that substantial harm to or loss of a Grade II Listed Building or a Grade II Registered Park or Garden should be exceptional.

Substantial harm to or loss of designated assets of the highest significance, including World Heritage Sites, Scheduled Monuments, Grade I and II* Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional.

- 16.31 Justification for any harm should be clear and convincing. Paragraph 202 states that where any harm to the significance of a designated heritage asset would be less than substantial, the harm should be weighed against the public benefits of the proposal. Paragraphs 201 states that proposals involving substantial harm to (or total loss of) significance should be refused unless it can be demonstrated that the harm or loss is necessary to achieve substantial public benefit that outweighs that harm or loss.
- 16.32 Paragraph 203 requires the significance of a non-designated heritage asset to be taken into account states that a balanced judgement be applied, having regard to the scale of any harm or loss and the significance of the heritage asset.
- 16.33 Guidance for the assessment for substantial harm is provided in National Planning Policy Guidance 2014 Conserving and Enhancing the Historic Environment. This states that the assessment of magnitude of harm is determined by the impact of the development on the value and significance of the heritage asset. The value of the asset is drawn from its architectural, historic, archaeological, and artistic interest, and also by the contribution of the asset's setting.

Assessment – NPPF Tests

- 16.34 Designated heritage assets: The built heritage assessment has not found any identified any adverse impacts or effects to designated heritage assets, and therefore none would be subject to any harm as a result of the Proposed Development.
- 16.35 Non-designated heritage assets: Adverse effects on non-designated built heritage assets have been identified during the construction phase, however these are judged to range from insignificant to minor significance, so are the lower end of Less than Substantial Harm.
- 16.36 In accordance with NPPF Paragraph 203, the significance of these non-designated heritage assets should be taken into account when making the balanced judgement, having regard to the scale of any harm or loss and the significance of the heritage asset.
- 16.37 The built heritage assessment has reported the value of the non-designated heritage assets as Low, with the exception of the Maltings Building which is of Medium value. The magnitude of

Harm is judged to be at the lower end of Less than Substantial, and although the heritages would be subject to change which would reduce their significance, the loss would be minimal.

16.38 Planning balance: Paragraph 202 of the NPPF states that, where a development proposal would lead to 'less than substantial harm', this harm must be balanced against the public benefits of the Proposed Development. The public benefits of the scheme are substantial and wide ranging, and it is considered that these benefits significantly outweigh the less than substantial harm caused to the Mortlake Conservation Area. The public benefits resulting from the Proposed Development are as follows:

- i. Up to 1,085 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 London Plan, and which will help to support London's growth as a world class city.
- ii. Of these 1,085 new homes, the scheme will provide affordable housing, 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 1,200 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 paragraph 5.3.5 of the London Plan, whilst offering greater educational choice.
- iv. Mix of high street uses including 4,547sqm of office space, a new cinema and up to 4,839sqm 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 (boathouse) 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 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. Several 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 2,697 new cycle parking spaces (long and short stay), 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 4.83 (including towpath) / 4.54 (excluding towpath) ha of open space across the whole to be of a better quality and more accessible to the public, which represents an average of approximately 51% of the overall site area.
- xix. Creation of a new public route to the River Thames and new open spaces adjacent, together with improvement works to the existing towpath.

16.39 All of these elements would result in a substantial social economic and environmental benefits. These public benefits, in the context of paragraph 202 of the NPPF, far outweigh the identified harm caused.

16.40 Therefore, the Proposed Development is considered to comply with the policies of the NPPF on this matter.

Townscape

Planning Policy

16.41 National planning policy requires development proposals to be sympathetic to local site context and surroundings (NPPF, paragraph 130(c)). This is echoed in the London Plan in respect of policies surrounding density and optimising site capacity (as assessed within Section 12 of this Statement). Specifically in respect of views, London Plan Policy HC3 encourages Boroughs to use the principles of the London View Management Framework for the designation and management of local views.

16.42 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.

16.43 The Site lies within designated local views and the Maltings Building is identified as a landmark within the Mortlake Village Planning Guidance SPD. Though not recognised specifically, the Site also forms the backdrop to the finishing line of the annual Oxford and Cambridge University Boat Race, therefore the Site has a key cultural interest within the townscape and visual amenity context.

Assessment

16.44 The Proposed Development is of a high architectural quality and will be in-keeping with the character of buildings established along the Thames in the southwestern part of London. The buildings proposed are all lower in height than the height of the tallest existing building on Site, as shown in the section drawing in the DAS (page 57).

16.45 The submitted ES includes an assessment of Townscape and Visual Effects (Chapter 16), prepared by Waterman IE assesses the likely significant effects of Proposed Development on

the local townscape character and visual amenity during the works and once the development is completed and operational.

- 16.46 The townscape assessment considers impacts on the townscape area boundaries as defined within the Mortlake Village Planning Guidance (2015). The townscape assessment considers the existing character of these areas, and an assessment of the likely significant effects of the Development during demolition, alteration, refurbishment and construction (the Works) and once the Development is completed and operational.
- 16.47 An assessment of the impacts of the Proposed Development upon Townscape and Visual Effects has been undertaken. Any effects on local townscape character areas from the completed development are deemed to range from long-term, local effects of moderate, beneficial significance to long-term, local effects of major, beneficial significance. Effects on surrounding townscape character areas would be of insignificant to long-term, local and minor beneficial significance in the vicinity of the Site.
- 16.48 In terms of visual amenity, Waterman IE find that most local views would experience either insignificant or long-term, local effects, ranging from minor to major beneficial significance depending on angle, range and context of view. Two viewpoints would experience adverse effects. Road users on Thames Bank at Viewpoint location 2 would experience effects of minor adverse significance, however this would be temporarily in transit. Recreational users of the Thames Path National Trail at Viewpoint location 2 would experience long-term, local effects of moderate adverse significance.
- 16.49 **The development therefore complies with LBRuT Local Plan Policy LP 5 as it is considered that the proposed design will protect and, in all but two cases, deliver beneficial improvements to views and vistas surrounding the Site.**

Archaeology

Planning Policy

- 16.50 The London Plan seeks to ensure that development incorporates measures which identify, record, protect and where appropriate present a site's archaeology (paragraph 7.1.11).

- 16.51 LBRuT policy seeks to protect, enhance and promote archaeological heritage and encourages its interpretation and presentation to the public (Local Plan Policy LP 7).

Assessment

- 16.52 To assess the potential impact of the Proposed Development upon archaeology (buried development), an assessment has been undertaken by RPS Consulting Services UK Ltd as part of the ES (Chapter 14). The assessment is supported by a below ground Desk Based Archaeological Assessment as well as archaeological evaluation and monitoring fieldwork.
- 16.53 The Site lies within the Mortlake and Barnes Archaeological Priority Area ('APA') and the northern boundary of the Site abuts the Thames Foreshore and Bank APA. The Assessment considers the baseline existing archaeological conditions and identifies a low archaeological potential for the roman and early medieval periods, a moderate potential for the pre-historic period and a high potential for the medieval and post-medieval periods.
- 16.54 The assessment considers the impact of below ground works (i.e. basement construction) on archaeological deposits. Effects from building the basements have been identified and therefore mitigation measures are proposed which include the implementation of a phased archaeological evaluation programme and implementation of further excavation work dependent on the results of the evaluation programme. This strategy has been discussed and agreed with GLAAS during pre-application discussions.
- 16.55 An Archaeological Assessment has been carried out as part of the ES (Chapter 14) and assesses the impact of proposed below ground works on existing buried heritage. Where effects are identified, mitigation measures are proposed so that, following the implementation of appropriate mitigation measures, no further residual effects are anticipated. These mitigation measures have been agreed with GLAAS. The scheme is therefore in compliance with planning policy requirements to identify and protect archaeological heritage.

17 Energy and Sustainability

Planning Policy

- 17.1 NPPF paragraph 20(d) encourages strategic polices to consider the conservation of the natural, built and historic environment including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation.

- 17.2 London Plan Policy SI2 seeks major developments to be net zero-carbon, reducing greenhouse gas emissions in accordance with the (i) be lean; (ii) be clean; (iii) be green; and (iv) be seen 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 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.

- 17.3 London Plan 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 9.3.3 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 paragraph 9.3.4 of the London Plan that **"developments should connect to existing heat networks, wherever feasible"**.
- 17.4 London Plan 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. Policy SI4 states this could be demonstrated through an Energy Strategy in accordance with the cooling hierarchy.
- 17.5 London Plan Policy SI7 seeks to conserve resources, reduce waste and increase in material re-use and recycling. This Policy is clear that referable applications should promote circular economy outcomes and aim to be net zero-waste.
- 17.6 LBRUT's Local Plan Policy LP 20 states that new development, in its layout, design construction, materials, landscaping and operation should minimise the effects of overheating as well as minimise energy consumption in accordance with the cooling hierarchy contained Part B(1-6). Part C of the same policy states that LBRuT will support opportunities to adapt existing buildings, places and spaces to the likely effects of climate change. Policy LP 22 encourages the highest standards of sustainable design and construction to mitigate the likely effects of climate change.

Assessment

Energy

- 17.7 The submitted Energy Strategy, prepared by Hoare Lea, sets out in detail the energy strategy for the Proposed Development.

- 17.8 The Proposed Development will achieve an overall reduction in regulated emissions of 71% (Application A – Development Area 1); 79% (Application A – Development Area 2) and 66% (Application B) against Part L. This is beyond the GLA’s minimum 35% policy threshold via on-site measures (Policy SI 2 (C)).
- 17.9 In terms of ‘Be Lean’, Development Area 1 of Application A includes the following passive design measures:
- i. Suitable glazing ratio and glass g-value (0.29) to balance heat losses, heat gains and daylight ingress;
 - ii. Fabric insulation levels achieving improvements over Building Regulations Part L (2013) requirements of 25%-100%; and
 - iii. Fabric air permeability achieving improvements over Building Regulations Part L (2013) requirements of 75% and 70% for dwellings and commercial spaces respectively.
- 17.10 Development Area 1 of Application A also includes the following energy efficient measures in response to ‘Be Lean’:
- i. Efficient space heating systems with zonal, programmable and thermostatic controls, with separate programmer for hot water;
 - ii. Efficient low-energy lighting throughout all dwellings. External and communal lighting will be coupled to daylight and presence detection sensors to minimise unnecessary use;
 - iii. Efficient mechanical ventilation with heat recovery which will limit the need for space heating in winter months, aid the mitigation of high internal temperatures in summer months (where openable windows cannot be used due to ambient acoustic conditions), and maintain good indoor air quality;
 - iv. Appropriately insulated pipework and ductwork (and air sealing to ductwork) to minimise losses and gains; and
 - v. Variable speed pumps and fans to minimise energy consumption for distribution of services.
- 17.11 The above measures would also be considered for the areas within Development Area 2.

17.12 In respect of ‘Be Clean’ the energy strategy produced to support this application seeks to utilise an all- electric strategy in the form of Air Source Heat Pumps, to meet thermal demand. Therefore, no additional savings are demonstrated at this stage of the hierarchy.

17.13 ‘Be Green’ has been assessed and the inclusion of on-site renewable energy generation has been considered (see section 7 of the Energy Strategy). In summary:

i. Development Area 1 – Application A: total solar PV space of 1,855sqm will be included. The use of ASHP would also lead to a potential saving of ~594 tonnes of regulated carbon emissions per annum

ii. Development Area 2 – Application A: at reserved matters stage the available roof space at Development Area 2 for the installation of solar PV panels will be considered. Again, the use of ASHP would also lead to a potential saving of ~285 tonnes of regulated carbon emissions per annum.

iii. Application B: PV is not proposed to be located on the school building as the roof area is being used to provide a play area and is also allocated for plant. The use of ASHP for the Proposed Development demonstrates a potential saving of ~52 tonnes of regulated carbon emissions per annum.

17.14 In accordance with the ‘Be Seen’ element of the London Plan Policy SI2 energy hierarchy, Hoare Lea’s Energy Statement demonstrates that effective energy metering will be enabled by the provision of suitable infrastructure within the building services systems of the Proposed Development. The developed strategy will allow for an exhaustive metering of all the various energy usage in the Proposed Development. The Applicant will also complete the GLA’s suggested “Be Seen” energy reporting protocols via the appropriate web portals, at the appropriate stage if required. Table 19 of the Energy Statement sets out a high-level summary of the reporting requirements for the three ‘be seen’ stages for all reportable unit types.

17.15 In order to meet the London Plan requirement for 100% emissions reduction target for dwellings and non-dwellings, the following carbon offset payments are due:

Whole Site (Application A and B)		Offset type	Cost (£)
Application A	Development Area 1	Residential	£568,244

		Non-residential	£357,596
	Development Area 2	Residential	£282,443
		Non-residential	£0
Application B		School	£99,573
Total Carbon Offset		n/a	£1,307,856

Table 18: Carbon offset payments

Heating and Cooling

- 17.16 Section 4 of the submitted Energy Strategy provides a response to London Plan Policy SI 4 in terms of heating and cooling.
- 17.17 The mitigation methods which will be implemented to minimise the internal heat generation through energy efficient design at the Proposed Development are set out at paragraph 4.2 of the Energy Strategy. The mitigation methods to be implemented to reduce the amount of heat entering the building in summer at the Proposed Development are also included at paragraph 4.2 of the submitted Energy Strategy.
- 17.18 In terms of ventilation, rooms will benefit from passive solar heating via openable panels. All residential spaces will be provided with mechanical ventilation.

Whole Life-Cycle Carbon Assessment

- 17.19 Whole Life-Cycle Carbon (WLCC) GLA Reporting Tool documentation, prepared by Hoare Lea has been submitted in support of the Proposed Development. The assessment of the School is included in the 'Detailed' documentation.
- 17.20 The WLCC demonstrates that a target of 95% of demolition materials resulting from the Proposed Development will be recycled, in line with London Plan Policy SI 7 (see Table 2 of the Circular Economy Statement).

BREEAM

- 17.21 The Proposed Development is targeting BREEAM 'Excellent' rating. This is in line with LBRuT Local Plan Policy LP 22 for new non-residential buildings (Part A (3)) and conversions to residential buildings (Part A (4)).

Circular Economy

- 17.22 In line with London Plan Policy SI 7, a Circular Economy Statement (CES), prepared by Hoare Lea has been submitted with this application. The CES outlines the circular economy measures that are being targeted within the Proposed Development. The targets for i) retained buildings, ii) reuse of materials; iii) recycling/recovering materials; iv) new development operational waste and v) waste during demolition and construction are set out in Section 3 of the CES.

Greenhouse Gases

- 17.23 Chapter 19 of Waterman IE's Environmental Statement presents an assessment of the likely significant effects of the Proposed Development on Greenhouse Gas (GHG) emissions through consideration of the direct and indirect GHG releases associated with the Proposed Development. Where appropriate, mitigation measures are identified to avoid, reduce or offset any significant adverse effects. The Chapter concludes that the Proposed Development would have an indirect, permanent, significant adverse effect. Waterman IE have judged this to be acceptable as the Proposed Development is compliant with all relevant policy relating to greenhouse gases and climate change.

Interim Conclusion

- 17.24 **The Proposed Development complies with national, strategic and local planning policy which seek to minimise carbon emissions and promote sustainable developments.**

18 Other Technical Considerations

18.1 This section assesses other technical considerations against relevant planning policies. The Proposed Development is found to be acceptable in all of these technical elements, as demonstrated in this section and the relevant technical documents.

18.2 This section includes an assessment of the following topics:

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

Ground Contamination

Planning Policy

18.3 London Plan Policy SD1 is clear that new development must take appropriate measures to deal with contamination that may exist. LBRuT's Local Plan promotes the remediation of contaminated land where necessary when development comes forward (Policy LP 10).

Assessment

- 18.4 A Ground Conditions and Contamination Assessment prepared by Waterman IE as part of the ES (Chapter 11) which assess the scope for receptors to be subject to contamination during the construction and operation stages of development has been submitted in support of the Applications.
- 18.5 Some significant effects (largely minor to moderate) are identified but these are largely proposed to be reduced to insignificant and, in some cases, beneficial, through mitigation measures. These measures include implementing a Construction Environmental Management Plan ('CEMP') during construction to minimise risks, undertaking a further desk-based assessment and further ground and geotechnical investigation to inform an appropriate Remediation Strategy as required.
- 18.6 **A Ground Conditions and Contamination Assessment has been prepared which demonstrates that, subject to appropriate mitigation measures, the contamination effects on receptors will not be significant.**

Services and Utilities

Planning Policy

- 18.7 London Plan Policy SI5 at Part D 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.
- 18.8 LBRuT's Local Plan Policy LP 23 requires developers to provide evidence that capacity exists in the public sewerage and water supply network to serve the development, and that any new infrastructure must be in place prior to occupation of the development.

Assessment

- 18.9 A Foul Sewage and Utilities Assessment has been prepared by Hoare Lea and submitted as part of the Applications. This document sets out the existing services and utilities infrastructure, and how the Proposed Development will be served. A Drainage Strategy has

also been prepared by Waterman IE which includes details on the proposed foul drainage methods. It is proposed to create new connections into existing sewers. Thames Water have confirmed that the existing public sewer network has the capacity to accommodate the proposed foul flows in a letter dated 13 May 2018 (appended to the Drainage Strategy, prepared by Waterman IE).

18.10 Consideration has been made for appropriate connections to existing services and utilities infrastructure.

Flooding and Drainage

Planning Policy

18.11 The Applications are accompanied by a Surface Water Resources and Flood Risk chapter within the ES (Chapter 12), which itself is supported by a Flood Risk Assessment ('FRA'), prepared by Hydro-Logic Services and a Drainage Strategy, which has been undertaken by Waterman IE. The FRA assesses flood risk impacts associated with the Site.

18.12 Chapter 14 of the NPPF sets out the sequential approach to planning new development and flood risk.

18.13 London Plan Policy SI12 at Part C 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.

18.14 London Plan 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.

18.15 LBRuT Local Plan Policy LP21 requires the submission of an Emergency Flood Plan (EFP).

Assessment

- 18.16 The FRA, prepared by Hydro-Logic Services, concludes compliance with the Sequential Test on the basis that LBRuT's Flood Risk Sequential Test (2016) states that it is not possible to provide the proposed uses at the Site on an alternative site in the Borough at a lower probability of flooding.
- 18.17 The FRA demonstrates that the Proposed Development satisfies the Exception Test and is therefore considered acceptable in flooding terms against NPPF criteria.
- 18.18 A range of flood risk management measures are proposed to make the Proposed Development safe from the effects of flooding. These include remodelling of the tidal defences (which has been developed in close conjunction with the Environment Agency and the PLA), ensuring appropriate finished floor levels for new development, designing the basements against flooding and implementation of drainage methods and temporary control of groundwater seepage during excavations.
- 18.19 An EFP has been prepared, in line with Local Plan Policy LP 21 (see ES Appendix 12.1, Appendix G). The EFP identifies a safe route from the Site to land that is wholly outside Flood Zone 3.
- 18.20 The Drainage Strategy, prepared by Waterman IE sets out the proposed drainage methods, and the principles for how Sustainable Drainage Systems ('SuDS') will be delivered on Site. It confirms that surface water runoff from the Site can be managed sustainably to ensure that flood risk is not increased elsewhere. This satisfies the requirements of the NPPF, the London Plan (Policies SI12 and SI13) and LBRuT (Local Plan Policy LP 21).
- 18.21 **The FRA demonstrates that the Proposed Development satisfies the NPPF Sequential and Exception tests. A range of flood mitigation measures are proposed to protect the Site occupiers from flooding including through scheme design and re-modelling of the existing tidal defences. Appropriate drainage methods are proposed to protect the local area from an increased risk in flooding. The Proposed Development is therefore considered to satisfy the relevant requirements of the NPPF, London Plan and LBRuT's flooding and drainage policies.**

Noise and Vibration

Planning Policy

- 18.22 Paragraph 185 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.
- 18.23 London Plan 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. 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 using distance, screening, layout, orientation, uses and materials.
- 18.24 LBRuT will encourage good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected (Policies LP 8 and LP 10).

Assessment

- 18.25 The impacts on existing and new residents arising as a result of the Proposed Development are assessed in full within the ES (Chapter 9 – Noise and Vibration, prepared by Waterman IE) and the Noise Impact Assessment, prepared by Hoare Lea. The ES considers the noise and vibration effects on existing and future sensitive receptors; the Noise Impact Assessment considers the suitability of the Site in terms of acoustic levels. Baseline noise surveys have been undertaken to support the conclusions reached in both documents.
- 18.26 The ES chapter considers vibration impacts during construction works and concludes that impacts on sensitive receptors would range from insignificant to temporary, short-term, local adverse effects of minor significance (i.e. the effect is undesirable but of limited concern). For noise during works on Site and with mitigation, these effects are classed as ranging from negligible to temporary, short-term, local residual effect of minor to moderate adverse. In

terms of the completed development, the ES concludes that the noise effects on sensitive receptors would be insignificant.

- 18.27 The Noise Impact Assessment sets design criteria for the Proposed Development in terms of ventilation, glazing and plant to make the Site suitable for new residential uses.
- 18.28 Paragraph 9.93 of ES Chapter 9 states that the intermittent noise levels of the proposed MUGA and 3G AGP are not expected to be any higher than the existing intermittent noise levels of play on the two existing sports pitches which currently do not have any fencing or noise mitigation in place. Paragraph 9.95 of the same report sets out the mitigation measures that the Proposed Development would install at the MUGA and AGP. It is considered that the built measures in combination with the control of operational hours will mitigate noise impact and reduce noise to an acceptable level from the MUGA and AGP.
- 18.29 **The impact of noise and vibration on existing and new residents has been assessed for the construction of the Proposed Development, and the noise levels generated by the completed development have also been considered. Measures will be put in place to minimise noise and vibration disruption during construction. Once the development has been completed, the noise assessments conclude that the effects on sensitive receptors will be acceptable. The scheme therefore complies with all relevant noise and vibration planning policies.**

Air Quality

Planning Policy

- 18.30 The NPPF at paragraph 174 is clear that development should, wherever possible, help to improve local environmental conditions such as air and water quality. Paragraph 185 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.
- 18.31 The NPPF at paragraph 186 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 186 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.

18.32 London Plan 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. 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.

18.33 The Local Plan states that developers should commit to ‘Emissions Neutral’ development where practicable. Mitigation measures to reduce the development’s impact upon air quality and strict mitigation for developments to be used by sensitive receptors, such as schools and care homes in areas of existing poor air quality will be required (Policy LP 10). LBRuT has also adopted an ‘Air Quality Action Plan (2019-2024)’ which outlines guiding principles in relation to air quality.

Assessment

18.34 A full assessment of potential air quality impacts has been carried out by Waterman IE and is set out within Chapter 10 of the ES. The assessment considers the air quality impacts from the works on Site to bring forward the development, as well as the operational impacts arising as a result of operational road traffic and proposed heating plant. The assessments have used baseline air quality monitoring data obtained from LBRuT.

18.35 The main likely effects on local air quality during the works would relate to dust, and a range of measures to minimise or prevent dust are proposed to be implemented via a CEMP so that no significant dust effects would result. The effect of construction vehicles and construction plant has been assessed to be insignificant. In terms of the operational development, Table 10.17 of ES Chapter 10 presents measures inherent to the Development and additional mitigation measures to be included during the construction and operational phases of the

Development which are likely to benefit local air quality including the provision of EVCs, travel plans and s278 highways works to Chalkers Corner to alleviate transport and traffic implications associated with the Proposed Development.

- 18.36 **Overall, the assessment concludes that the Proposed Development and the works would give rise to insignificant air quality effects, subject to mitigation measures.**

Odour Impacts

Planning Policy

- 18.37 Local Plan Policy LP 10 states that the Council will seek to ensure that any potential impacts relating to odour and fumes from commercial activities are adequately mitigated through suitable filtration and abatement technologies and appropriate filtration siting and design.

Assessment

- 18.38 As set out within section 4 of this Town Planning Statement, the flexible commercial uses include an element of restaurant uses, which would necessitate the need for kitchen extraction equipment. At this stage, the details of occupiers are unknown and therefore these details cannot be progressed at this time. In the absence of this information, Waterman IE has prepared an Odour Assessment Report which sets out design guidelines that will be followed for any units requiring kitchen extraction equipment.
- 18.39 **The impacts on air quality from the Proposed Development have been thoroughly considered, both in terms of impacts during construction and when the development is operational. The assessments conclude that the impact on air quality is acceptable. An Odour Assessment Report has been prepared which sets out guidelines for proposed kitchen extract equipment.**

Biodiversity and Ecology

Planning Policy

- 18.40 The NPPF at paragraph 174 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.

- 18.41 London Plan Policy G6 at Part (D) stipulates that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. The Policy is clear this should be informed by the best available ecological information and addressed from the start of the development process.
- 18.42 LBRuT expect all new development to preserve and, where possible, enhance existing habitats including river corridors and biodiversity features, including trees. Building design and landscaping should aim attract wildlife and promote biodiversity, where possible. New habitats and biodiversity features should make a positive contribution to and should be integrated and linked to the wider green and blue infrastructure network (Local Plan Policy LP 15). LBRuT have also adopted a SPG entitled 'Nature Conservation and Development' which encourages nature conservation for new development proposals.

Legislation

- 18.43 Under the Environment Act (2021) there will be a legislative requirement to demonstrate a 10% Biodiversity Net Gain (BNG) in new developments.

Assessment

- 18.44 The Ecology Assessment (ES Chapter 13) notes that the Site is not subject to a statutory ecological designation. The River Thames and Tidal Tributaries, directly to the north of the Site, is designated as a Site of Importance for Nature Conservation ('SINC'), with Metropolitan value.
- 18.45 The Assessment identifies effects on local ecology from the development during construction and operation of the Proposed Development (Table 13.6). The residual effects on biodiversity in the completed Development are all considered to be not significant, except for direct effects on roosting and commuting and foraging bats, which are considered to have beneficial effects.
- 18.46 Proposed works to enhance biodiversity and ecology on Site are factored into Waterman IE's assessment of ecological impact. These include the planting of new trees and hedges, use of

native species, or species of benefit to wildlife where new planting is proposed, provision of biodiversity roofs, provision of a green link, community park and pocket park and provision of bat boxes. Further detail on the proposed urban greening measures can be found within the submitted Landscape DAS for Applications A and B, prepared by Gillespies.

- 18.47 A Biodiversity Net Gain Design Stage Report has been submitted with the Applications (ES Appendix 13.4). The Site has an overall prediction of a 29.55% net gain for the habitats on Site with 2.7 net change in habitat units. The Site has an overall prediction of a 21.04% net gain for the hedgerow on Site with a net change of 0.63 hedgerow units.
- 18.48 **Impact on the surrounding ecology and biodiversity has been considered in the submitted Ecology Assessment against ES significance criteria. A number of measures are proposed to encourage biodiversity, including creating green spaces and planting. The Proposed Development will therefore protect and enhance ecology and biodiversity in line with policy requirements.**

Daylight/Sunlight

Planning Policy

- 18.49 The NPPF stipulates that planning policies and decisions should always seek to secure a good standard of amenity for existing and future occupants of land and buildings (paragraph 130 (f)).
- 18.50 The BRE document 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2011) provides non-statutory guidance on matters of daylight and sunlight and overshadowing. These guidelines are often referenced in adopted planning policies.
- 18.51 London Plan 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

- 18.52 Chapter 18 of the ES, prepared by eb7, includes an assessment of the likely significant effects of the Proposed Development on daylight, sunlight, overshadowing and light pollution at sensitive receptors surrounding the Site. In terms of daylight, once the development is

completed the ES concludes that the likely effects on daylight for residential properties in the vicinity of the Site would range from being insignificant for the majority of the residential properties to long-term, local, adverse effects of minor and minor to moderate significance. There is one instance of long-term, local and of moderate to major adverse significance at Boat Race House. Paragraph 18.96 of ES Chapter 18 states that this is purely based on reduction from the current unobstructed view. Overall the effect to daylight of the Proposed Development is considered to be of long-term, local and of minor to moderate adverse significance.

- 18.53 The ES assessment has considered a maximum extent for massing for the elements of the scheme applied for in outline (Development Area 2) and thus as the scheme evolves the impacts are likely to lessen. In terms of sunlight, the assessment concludes that once the development is completed, the effects on sunlight for residential receptors in the vicinity of the Site are insignificant.
- 18.54 With regard to overshadowing, once the development is completed, the likely residual effects on overshadowing to existing surrounding amenity areas would remain insignificant. The likely effects on overshadowing to the proposed amenity areas within the development would also be insignificant. Again, there could be scope to improve impacts once elements applied for in outline are brought forward into detailed design via Reserved Matters.
- 18.55 eb7 has also prepared a standalone report which assesses the internal daylight and sunlight levels that new residents would experience once the scheme had been built and occupied, as well as overshadowing impacts for amenity spaces. In terms of daylight, the assessment shows that circa 90% of all rooms would meet or exceed BRE targets well in excess of the levels (paragraph 7.3). Where levels are below targets, this is due primarily to overhanging balconies and wider Site constraints. The considered design has focused on maximising daylight levels to living rooms as is considered good practice. With respect to the sunlight assessment, there are some instances where direct sunlight to the window face will be limited. However, this is usual for a scheme of this type where the orientation of the Site dictates east-west units. The results show that 66% of rooms achieve compliance with BRE criteria. For the overshadowing assessment, 77% of amenity spaces assessed would achieve direct sunlight levels in line with BRE criteria (including the school playing field).

18.56 **Impact on daylight/sunlight and overshadowing has been assessed. The majority of 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

18.57 According to London Plan Policy S5 (B)(3) the provision of sports lighting should be supported in areas where there is an identified need to increase sports participation opportunities unless the lighting gives rise to demonstrable harm to the local community or biodiversity. This approach to floodlighting is reflected in LBRuT's Local Plan Policy LP 9.

Assessment

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

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

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

Wind Microclimate

- 18.61 London Plan Policy D8 states that development proposals should consider the local microclimate created by buildings and should ensure that local microclimate is taken into consideration when designing the public realm.
- 18.62 Policy D9 of the London Plan states that development proposals should assess the impact of tall buildings on wind and other microclimatic conditions.
- 18.63 Local Plan Policy LP 2 also requires that new building design and heights take account of climatic effects, including diversion of wind speeds.

Assessment

- 18.64 A Wind Microclimate Assessment has been prepared by RWDI as part of the ES (Chapter 17). RWDI has carried out wind tunnel testing to fully assess the impact of the development upon pedestrian wind microclimate. In terms of how the effects are measured, RWDI have used the Lawson Comfort Criteria (LCC) which seeks to define the reaction of an average pedestrian to the wind. Significance criteria have then been based upon the relationship between the desired pedestrian use (as defined by the LCC) at a particular location and the modelled (predicted) wind conditions at the same location.
- 18.65 **The Wind Microclimate Assessment demonstrates that the Proposed Development would have insignificant or beneficial effects on the local wind microclimate. Mitigation measures to reduce wind tunnel effects have been recommended to be incorporated into the design of buildings where appropriate.**

Human Health

Planning Policy

- 18.66 The national Planning Practice Guidance (PPG) states that local planning authorities should ensure that the healthcare infrastructure implications of any relevant proposed local development are considered. The PPG also refers to Health Impact Assessment (HIA) as a useful tool to assess and address the impacts of development proposals.

18.67 London Plan Policy GG3 states that those involved in planning and development must assess the potential impacts of development proposals on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments.

18.68 LBRuT Local Plan Policy LP 30 states that a Health Impact Assessment must be submitted with all major development proposals.

Assessment

18.69 A Health Impact Assessment (HIA) has been prepared by Hatch and submitted in support of the Applications, in accordance with London Plan Policy GG3 and LBRuT Local Plan Policy LP 30.

18.70 The HIA concludes that the Proposed Development will lead to a number of positive health impacts, as follows:

- i. Additional housing units varying in size and tenure making a contribution to the borough's annual housing target and meeting local demand for family housing and affordable housing;
- ii. Improving the social infrastructure provision in the local area;
- iii. Improved access to open space and nature;
- iv. Access to work and training; and
- v. Best use of existing land.

18.71 The HIA also identifies various mitigation or enhancement measures which should be implemented as part of the Proposed Development (paragraph 4.3).

18.72 It is considered that the submitted HIA demonstrates that the Proposed Development complies with relevant planning policy at all levels in respect of human health.

19 Planning Obligations and Infrastructure Requirements

- 19.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, LPAs have the power to enter into planning obligations with any person interested in land in their area for the purpose of regulating or restricting the development or use of land.
- 19.2 In accordance with Regulation 122 of the Community Infrastructure Levy ('CIL') Regulations, and paragraph 204 of the NPPF, a planning obligation should only be sought where the obligations meet all of the following tests:
- a) Necessary to make the proposed development acceptable in planning terms;
 - b) Directly related to the proposed development; and
 - c) Fairly and reasonably related in scale and kind to the proposed development.
- 19.3 Paragraph 203 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 19.4 For development proposals within London, the Mayor of London is a CIL charging authority for the purposes of Part 11 of the Planning Act 2008. Accordingly, a Mayoral CIL charge is set out within the Mayor's CIL Charging Schedule (2019).
- 19.5 The London Borough of Richmond-Upon-Thames has adopted its CIL Charging Schedule (November 2014) and a revised Planning Obligations SPD (June 2020).
- 19.6 The Proposed Development will be liable for CIL payments.

Draft Heads of Terms

- 19.7 The Applicant anticipates entering into a legal agreement with LBRuT to secure the reasonable and necessary planning obligations associated with the Proposed Development in accordance with regulation 122 of the CIL Regulations and LBRuT's Planning Obligations SPD.
- 19.8 Some potential draft heads of terms for the legal agreement are set out below, which have been discussed with LBRuT officers prior to the submission of the Applications. The details of the potential draft heads of terms will be discussed with LBRuT officers in due course:

- a) Affordable housing;
- b) Wheelchair accessible units;
- c) Affordable Workspace;
- d) Land for school and playing fields (Application B) to be offered to ESFA or their nominee prior to commencement of Application A;
- e) Section 278 highways works to be completed prior to occupation of school (Application B) or agreed level of buildings in Application A being occupied;
- f) Other transport measures:
 - i. Bus contribution;
 - ii. TfL Pedestrian Improvement Scheme;
 - iii. Allowance for space for the potential provision of cycle hire schemes in the future;
 - iv. Car club spaces;
 - v. Re-provision of car parking spaces along Williams Lane (20) and Ship Lane (2) and provision of 20% EVCPs;
 - vi. Car parking management plan for Blue Badge holders;
 - vii. Implementation of Travel Plans;
 - viii. Resident parking permit restrictions;
 - ix. Safeguarding land for bus turnaround; and
 - x. Highways works to be secured and then delivered through subsequent section 278 agreement.
- g) If necessary a carbon offsetting contribution;
- h) 'Be Seen' monitoring;
- i) Construction Management Statement;
- j) Sports provision:

- i. Community Use Agreement for use of school sports facilities by local groups outside of school hours;
 - ii. Grass pitch improvement contribution;
 - iii. Barnes Eagles obligations;
 - iv. Covenant of Use; and
 - v. Re-provision of facilities for local football club.
-
- k) Towpath works;
 - l) Mortlake Green contribution;
 - m) Air quality obligations and contribution;
 - n) Employment and skills training measures;
 - o) Local Employment Agreement;
 - p) Community Park transfer;
 - q) Provision of community space;
 - r) Provision of boat house and water sports centre;
 - s) Refuse and recycling contribution; and
 - t) Phasing plan.

20 Conclusions

- 20.1 Reselton Properties Limited proposes the comprehensive redevelopment of the Former Stag Brewery Site in Mortlake for a significant mixed-use residential-led scheme to create a new heart for Mortlake, comprising up to 1,085 residential homes (including affordable homes), complementary commercial uses, community facilities, a new secondary school and extensive public open landscaped space.
- 20.2 The submission of the Applications follows an extensive period of consultation with key stakeholders, including the consultation undertaken on the previous schemes. Feedback and advice received during this process has shaped and influenced the proposed masterplan scheme submitted for consideration.
- 20.3 This Statement has assessed the Proposed Development against the development plan and other relevant planning policy guidance at national, regional and local policy levels, including the provisions of the adopted SBPB.
- 20.4 The Proposed Development would deliver a scheme which responds to the strategic objectives of the Mayor's policy, as well as realising LBRuT's ambitions for the Site as set out in LBRuT Local Plan Policy SA 24. The Proposed Development 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.
- 20.5 The principles of the Proposed Development remain as per the Original Applications considered by LBRuT's Planning Committee in January 2020 (refs: 18/0547/FUL and 18/0548/FUL). The Proposed Development has been prepared to respond directly to issues raised by the Mayor in his Stage 3 decision in respect of height, bulk and massing, whilst incorporating benefits from the Refused Scheme such as removal of the western basement and the associate reduction in car parking spaces. The Applicant has progressed an alternative approach for addressing and mitigating the impacts on the surrounding highways network, and these have been tested within the relevant submission documents for Applications A and B. This option has been discussed and tested with the GLA and TfL. The

mitigation approach falls on land within the existing highway boundaries and if agreed would not, in itself, require planning consent.

20.6 With respect to Section 38(6) of the Planning and Compulsory Purchase Act (2004), it is concluded that the Proposed Development is in accordance with the development plan as a whole. The Proposed Development would deliver substantial public benefits which directly respond to the site allocation and LBRuT objectives and would include:

- i. Up to 1,085 new homes, with up to 22% provided as on-site affordable housing by habitable room (subject to financial viability review), 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. Substantial sustainability benefits, including targetting an Excellent BREEAM rating, 73% and 66% reduction in carbon emissions against Part L (Application A and B respectively) and a site wide (Applications A and B) 0.286 UGF score;
- iv. Economic benefits arising from the provision of a range of new commercial uses including new commercial Class E office floorspace, which would include an element of affordable workspace, benefits arising from employee spend and local construction jobs;
- v. Provision of a new six form entry secondary school, in line with the identified aspirations in the LBRuT Local Plan;
- vi. Creation of new community spaces, including a new water sports centre (boathouse) and community space, alongside new public squares and plazas to encourage community engagement;
- vii. 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;

- viii. 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
- ix. Significant CIL contribution which will facilitate improvements to local infrastructure and the Mayor's strategic transport infrastructure.

20.7 For the reasons outlined, it is considered that planning permission should be granted for both applications.

Appendix A – Plans Referred to Throughout the Statement

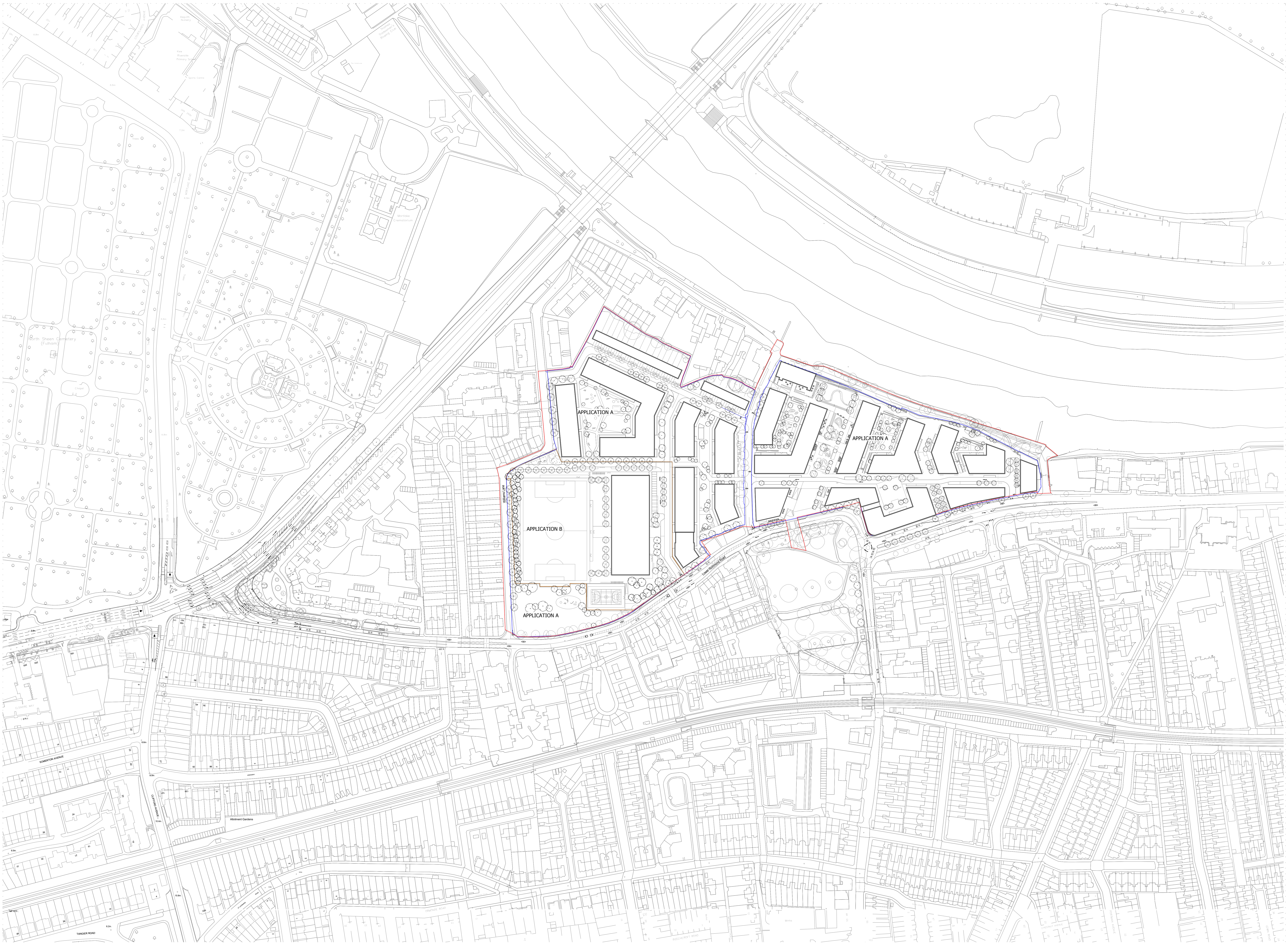
Appendix B – Original Applications’ Decision Notices

Appendix C – Planning History

Appendix D – Scheme Comparison Table

Appendix E – Meeting Schedule

Appendix A: Plans Referred to Throughout the Statement



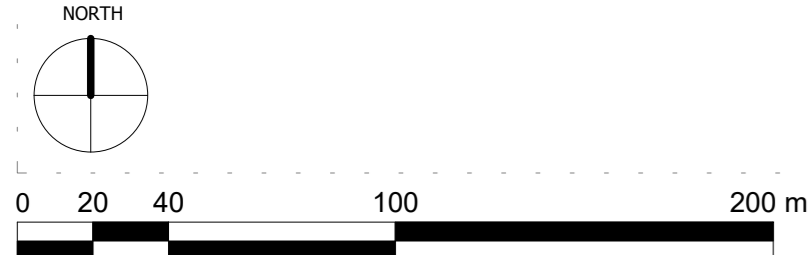
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NORTH

— Site Ownership Boundary
 — Application A Boundary
 — Application B Boundary

Note: Application B Site is wholly within Application A boundary



LBRLT 2 APPLICATION	04/02/22	B3	B
LEGAL REVIEW COMMENTS	01/06/20	B3	A
GLA SUBMISSION	21/04/20	B1	-
Revision description	Date	Check	Rev

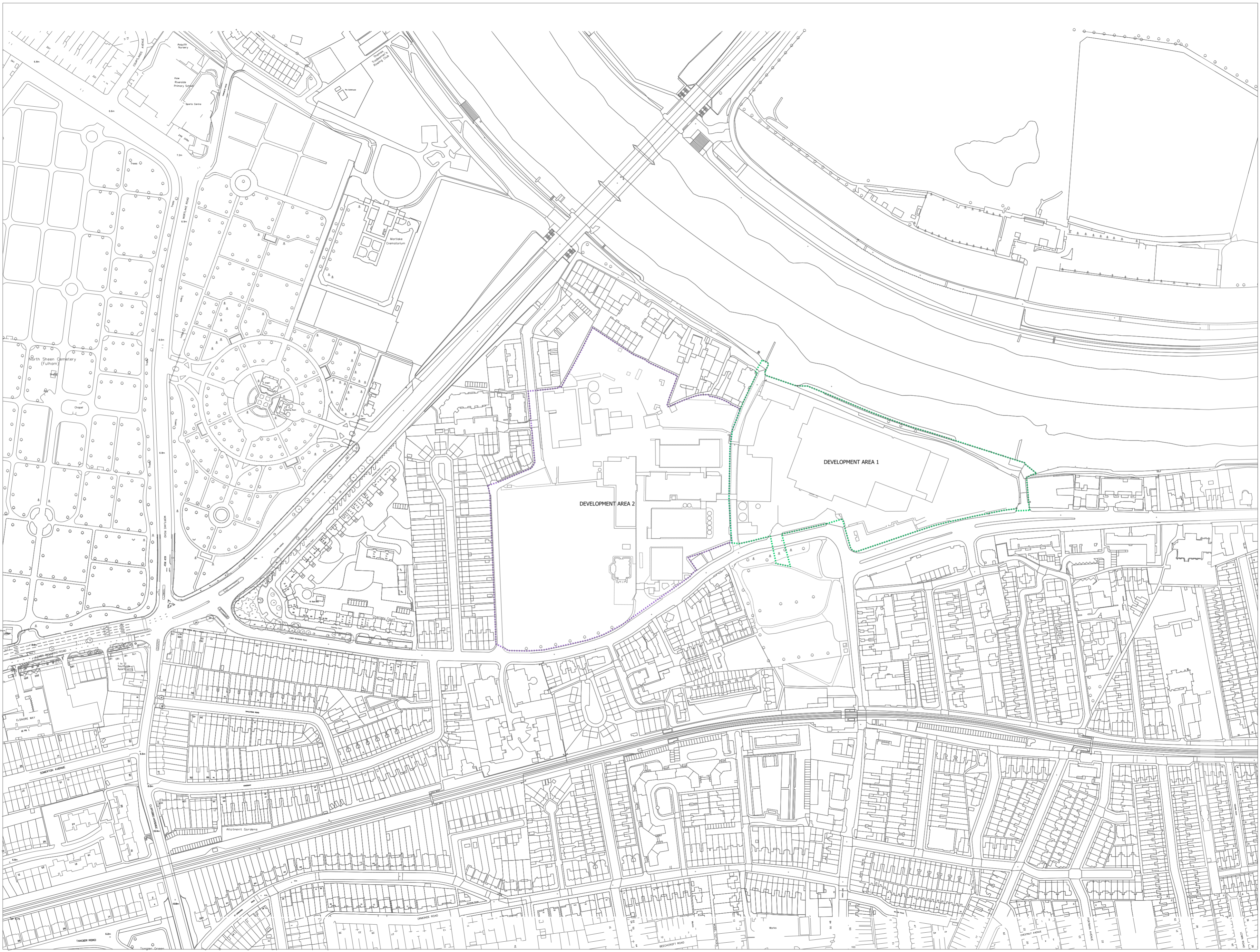
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Project
Stag Brewery
 Richmond

Drawing
SITE APPLICATION BOUNDARIES
APPLICATION A & B

Drawn	Date	Scale
RKB	21/04/20	1:1250 @ A0 1:2500 @ A2
326 Number	Drawing number	Revision
18125	C645_Z0_P_00_001	B



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..... Development Area 1
 Development Area 2

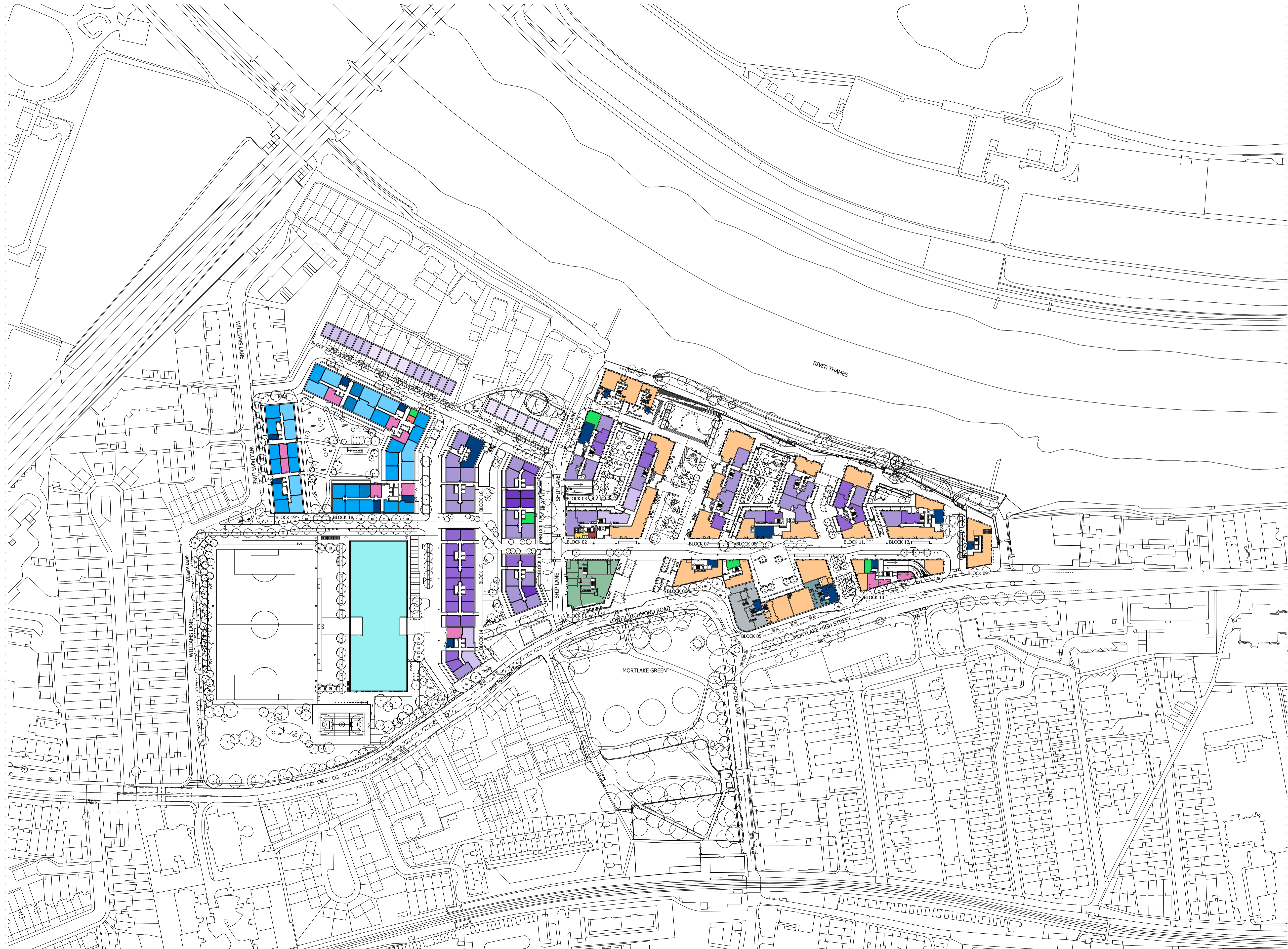
PLANNING APPLICATION 12/02/18 B3
 Date Check Rev

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Drawing
**DEVELOPMENT AREA 1 AND
 DEVELOPMENT AREA 2 BOUNDARIES**

Drawn	Date	Scale
KHO	04/10/17	1:1250 @ A0
Job number	Drawing number	Revision
16019	JA12_ZO_P_00_008	-



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NOTE: UNIT MIX AND LAYOUT FOR DEVELOPMENT AREA 2 IS INDICATIVE AT THIS STAGE

- Studio
- 1B2P
- 2B3P
- 2B4P
- 3B4P
- 3B5P
- 3B6P
- 4B8P
- 1B2P SR
- 2B3P SR
- 2B4P SR
- 3B5P SR
- 3B6P SR
- BIKE STORE
- CAR PARK ENTRANCE
- CINEMA
- FLEXIBLE USE
- GAS METER ROOM
- HOTEL
- LV SWITCHROOM
- OFFICE
- REFUSE STORE
- SCHOOL
- SUBSTATION

LBUR 2 APPLICATION	04/02/22	BJ	E
FINAL DRAFT HYBRID SUBMISSION	07/01/22	RKB	D
GLA SUBMISSION	27/04/20	BJ	C
DRAFT GLA SUBMISSION	24/01/20	KH	B
FINAL DRAFT PLANNING APPLICATION	21/10/19	KH	A
LEGAL REVIEW	13/09/19	KH	-

Revision description	Date	Check	Rev

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Project
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 Richmond

PROPOSED MASTERPLAN GROUND FLOOR LEVEL

Drawn	Date	Scale
TC	18/01/18	1:1250 @ A1 1:2500 @ A3
Job Number	Drawing number	Revision
18125	C645_MP_P_00_001	E

