



Stag Brewery, Mortlake - Temporary Use Application

Air Quality Neutral Assessment

August 2022

Waterman Infrastructure & Environment Ltd

Merchants House, Wapping Road, Bristol BS1 4RW
www.watermangroup.com



Client Name: Reselton Properties Ltd
Document Reference: WIE18671-113-R.12.2.2.AQN
Project Number: WIE18671-113

Quality Assurance – Approval Status

This document has been prepared and checked in accordance with Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Issue	Date	Prepared by	Checked by	Approved by
First	August 2022	Andy Fowler Associate Director	Ellen Smith Principal Consultant	Andy Fowler Associate Director

Comments

Comments



Disclaimer

This report has been prepared by Waterman Infrastructure & Environment Limited, with all reasonable skill, care and diligence within the terms of the Contract with the client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

Contents

1. Introduction	1
Introduction	1
Description of the Development.....	1
Assumptions, Exclusions and Limitations	1
2. Planning Policy and Guidance	2
The London Plan, March 2021	2
The Mayor’s Air Quality Strategy ‘Clearing the Air’, 2010	2
Sustainable Design and Construction - Supplementary Planning Guidance, 2014	2
Air Quality Neutral Planning Support: GLA 80371, April 2014	2
London Plan Guidance, Air Quality Neutral Consultation Draft, November 2021	3
3. Air Quality Neutral Calculation	5
Transport Emissions	5
4. Conclusion	6

1. Introduction

Introduction

Waterman Infrastructure & Environment Ltd (hereafter 'Waterman') have been commissioned by Reselton Properties Limited to undertake an Air Quality Neutral Assessment for a planning application for the temporary use of land at the former Stag Brewery (the 'Site') for a period of five years for film production operations and ancillary activities (sui generis). The Site is located in Mortlake, southwest London within the administrative boundary of the London Borough of Richmond upon Thames (LBRuT).

Description of the Development

The Applicant is seeking temporary planning permission for a period of five years, with The Walt Disney Picture Company and The Story Company (TSC) Entertainment (ATB) Ltd (hereafter 'The Operator') being the proposed tenant using the Site. The application seeks planning permission for the temporary use of the whole site for filming purposes and associated ancillary activities. Initially, it is envisaged that the operator will only utilise Buildings 11, 12, 14 and 15 as well as yard areas in the east of the site and an external area adjacent to the Maltings building (Building 9). All necessary information has been submitted alongside the application to enable the immediate occupation of these buildings and should other buildings on the site be required to be utilised under the permission, it is envisaged that further details would be required to be provided by way of a suitably worded condition attached to the permission. It should also be noted that the application also includes the temporary erection of external film sets outside of the Maltings building (Building 9). The temporary film production operations are hereafter referred to as the 'Development'.

Assumptions, Exclusions and Limitations

The scheme is located within Outer London. The floorspace of Buildings 11, 12, 14 and 15 (for which it is envisaged the Operator will initially use only), totals approximately 12,000m². 12,000m² was used in the air quality neutral calculations. The yard areas were excluded from the calculations for a conservative assessment. Should the Operator require use of the other buildings on-Site, it is envisioned that an AQNA be prepared for those buildings prior to occupation.

The Development does not propose combustion plant and would therefore not give rise to any significant adverse air quality impacts. The heating plant was therefore considered to be 'Air Quality Neutral' with respect to building emissions. Building emissions have therefore not been considered further within the air quality neutral assessment.

The Air Quality Neutral assessment has been based on the Greater London Authority's Air Quality Neutral Consultation draft, November 2021. Benchmark trip rates for film production operations are not available - trip rates associated with Office / Light Industrial were therefore used.

2. Planning Policy and Guidance

The London Plan, March 2021

Policy SI1 Improving air quality of the Mayor of London's London Plan¹ states that:

"...a) development proposals must be at least Air Quality Neutral..."

The Mayor's Air Quality Strategy 'Clearing the Air', 2010

Similarly, the Mayor's Air Quality Strategy² states that:

"New developments in London shall as a minimum be 'air quality neutral' through the adoption of best practice in the management and mitigation of emissions".

Sustainable Design and Construction - Supplementary Planning Guidance, 2014

The Sustainable Design and Guidance – Supplementary Planning Guidance (SPG) provides updated guidance to support the implementation of the London Plan.

Further to Policy 7.14a of the 2016 London Plan (now superseded by Policy SI 1 of the 2021 London Plan), Section 4.3 of the SPG focusses on air pollution and the effects from the operation of new developments within Greater London. The SPG requires all new developments to be at least 'air quality neutral'.

Paragraph 4.3.15 of the SPG states:

"This policy applies to all major developments in Greater London. Developers will have to calculate the NO_x and / or PM₁₀ emissions from the buildings and transport elements of their developments and compare them to the benchmarks set out in Appendix 5 and 6."

The SPG presents emission benchmarks for buildings (associated with emissions from combustion plant introduced as part of a development to provide heating and power) and transport (associated with vehicle trips related to the operation of the development). It is considered that where a development does not exceed these benchmarks, it would be 'air quality neutral' and would not increase NO_x (oxides of nitrogen) and PM₁₀ (particulate matter of 10µm diameter or less) emissions across London as a whole. A discussion on the Building Emission Benchmarks (BEBs) and the Transport Emission Benchmarks (TEBs) as set out within the SPG is presented below.

In addition to the BEBs and TEBs, the SPG provides emissions standards for any proposed combustion plant (individual / communal gas boilers, solid biomass or Combined Heat and Power (CHP) plant) to be introduced as part of a development. These emissions standards must be complied with.

Air Quality Neutral Planning Support: GLA 80371, April 2014

In April 2014, the GLA published the Air Quality Neutral Planning Support: GLA 80371³ to provide support to the development of the Mayor's policy related to 'air quality neutral' developments. The report provides a method to enable a development to be assessed against the air quality neutral benchmarks set out in the Sustainable Design and Construction SPG.

The report provides a methodology required to apply the air quality neutral policy. It requires the transport and building emissions for the development to be identified and then compared to the benchmark

¹ Greater London Authority. 2021. The London Plan: The Spatial Development Strategy for Greater London, March 2021, GLA, London

² Greater London Authority (GLA), 'The Mayor's Air Quality Strategy: Cleaning London's Air', London, 2002.

³ Air Quality Consultants Environ Air Quality Neutral Planning Support: GLA 80371. April 2014

emissions. The report notes that the building and transport emissions should be calculated separately and not combined.

London Plan Guidance, Air Quality Neutral Consultation Draft, November 2021

The Air Quality Neutral Consultation draft⁴, hereafter referred to as the 'Consultation Draft' provides an update to the Air Quality Neutral Planning Support guidance from April 2014. The consultation draft details how developments are required to submit an Air Quality Neutral assessment that demonstrates how the development would meet the air quality neutral benchmarks.

The Consultation Draft states that a development must meet both the building and transport emission benchmarks separately to be Air Quality Neutral. If one or both benchmarks are not met, appropriate mitigation or offsetting will be required provides a methodology required to apply the air quality neutral policy.

The 'Excluded development' section of the Consultation Draft sets out that developments which do not include additional emissions sources are assumed to be Air Quality Neutral and do not need an Air Quality Neutral assessment. Examples of excluded development include developments that have no additional motor vehicle parking, do not lead to an increase in motor vehicle movements and do not include new combustion plant such as gas-fired boilers.

London Borough of Richmond Upon Thames, Adopted Local Plan 2018

Policy LP 10 of LBRuT's adopted Local Plan⁵ sets out that Developers should secure at least 'Emissions Neutral' development. To consider the impact of introducing new developments in areas already subject to poor air quality, the following will be required:

1. an air quality impact assessment, including where necessary, modelled data;
2. mitigation measures to reduce the development's impact upon air quality, including the type of equipment installed, thermal insulation and ducting abatement technology;
3. measures to protect the occupiers of new developments from existing sources; and
4. strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in areas of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors.

London Borough of Richmond Upon Thames, Draft Local Plan 2022

Policy 53 of the LBRuT's draft Local Plan⁶ sets out all developments must be at least "Air Quality Neutral". Proposals that would materially increase exceedances of local air pollutants will be resisted unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in Richmond's Local Air Quality Management Plan.

The Council will require financial contributions towards off-site air quality measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact upon poor air quality. Specific guidance for air quality in new developments is set out in the Council's Air Quality SPD (2020).

⁴ Mayor Of London. 2021. London Plan Guidance, Air Quality Neutral Consultation Draft, November 2021

⁵ LBRuT. 2018. Adopted Local Plan, July 2018.

⁶ LBRuT. 2022. Richmond Local Plan 'The best for our borough' Draft for consultation, January 2022.

London Borough of Richmond Upon Thames, Supplementary Planning Document – Air Quality, June 2020

This guidance supplements LBRuT's policy that all major developments must be air quality neutral and details how air quality neutral assessments should be undertaken and follows that advised in the GLA's SPD and air quality neutral guidance as described above.

3. Air Quality Neutral Calculation

The Air Quality Neutral Assessment of the Development has been based on the approach and methodology detailed within the Air Quality Neutral Consultation Draft given this methodology complies with the requirements of the adopted 2021 London Plan. The calculations are presented below.

Transport Emissions

The transport emissions benchmark (TEB) was calculated by multiplying the approximate floorspace with the benchmarked trip rates for Outer London presented in **Table 1**.

Details of the trip generation per day were taken from the Technical Note (version 5, dated July 2022) produced by Stantec. The Technical Note set out the transport impact of the proposed temporary use of the existing buildings and land for a period of five years, for film production operations and ancillary activities.

The Air Quality Neutral Consultation Draft states the TEB only estimates car or light van trips generated by the development occupiers. The TEB does not include trips generated by deliveries and servicing, taxis or heavy vehicle movements from non-occupiers. Assessment of these trips should be captured in the wider air quality impact assessment where one is required. However, for a conservative assessment, the approximate 26 daily delivery & servicing trips have been included in the calculation.

The transport emissions benchmark and the total transport emissions for the Development are presented in **Table 1**.

Table 1: Calculation of the Benchmarked Transport Emissions

Land Use	Floorspace	Benchmark		Development	
		Trip Rates Outer London	TEB	Per Day	Per Annum
Office / Light Industrial	12,000*	16	192,000	82	29,930

Note: *Yard areas were excluded for a conservative assessment

As shown in **Table 1**, the 29,930 annual vehicle trips generated by the Development would be less than the TEB of 192,000.

The Development is therefore 'Air Quality Neutral' in relation to transport emissions, and no further mitigation measures would be required.

4. Conclusion

In accordance with the Consultation Draft and the adopted 2021 London Plan, the development would be Air Quality Neutral.

UK and Ireland Office Locations

