

# Former Stag Brewery, Mortlake

Local Planning Authority: Richmond upon Thames

Planning application references: 22/0902/FUL and 22/0900/OUT

## Strategic planning application stage 1 referral

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

## The proposal

Two linked planning applications for the comprehensive phased mixed use redevelopment of the site comprising up to 1,085 residential homes alongside office, flexible commercial, community, hotel, cinema uses together with a boathouse, a new secondary school and sixth form with associated sports pitch, play space, multi-use games area, alongside associated landscaping, public realm, access and flood defence works with building heights up to 9-storeys, plus basement (15% affordable housing by unit).

## The applicant

The applicant is **Reselton Properties Limited**, and the architect is **Squire & Partners**

## Strategic issues summary

**Land use principles:** The comprehensive mixed use redevelopment of the site including the proposed land uses is in line with the land use objectives set out in the Local Plan Site Allocation and Planning Brief SPD.

**Housing and affordable housing:** 15% affordable housing (by unit) with a 20:80 tenure mix weighted towards intermediate shared ownership is wholly unacceptable. The overall level of affordable housing should be increased and the tenure mix revised and weighted in favour of social rent. Housing affordability levels should be secured alongside early, mid and late stage viability review mechanisms. A number of the assumptions and conclusions in the applicant's Financial Viability Assessment are not accepted including profit requirements, residential sales values and the substantial deficit. The quantum of affordable housing in the outline element of the scheme and in particular within Building 18 should be further optimised within the proposed building footprint and massing.

**Urban design and heritage:** Whilst the massing has been revised the application conflicts with London Plan policies on heritage and the heights exceed the Council's Planning Brief SPD. Harm to heritage assets must be clearly and convincingly outweighed by public benefits associated with the proposal.

**Transport:** Financial contributions towards bus capacity, the A205 Upper Richmond Road/Sheen lane junction improvement scheme, and the delivery of a crossing and shared footway / cycleway improvements on the A316 Clifford Avenue are required. The highway assessment should be revisited to take into consideration new surveys and forecasts in order to bring the assessment up to current standards. A sustainable Travel Fund should be secured to encourage active travel.

**Climate change:** Further discussion is required relating to energy efficiency measures in the non-residential element and additional clarifications on the applicant's air quality assessment.

## Recommendation

That Richmond Council be advised that the applications do not comply with the London Plan for the reasons set out in paragraph 137.

## Context

1. On 12 April 2022 the Mayor of London received documents from Richmond upon Thames Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
  - *Category 1A - "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
  - *Category 1B – "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— (c) outside Central London and with a total floorspace of more than 15,000 square metres."*
  - *Category 1C – "Development which comprises or includes the erection of a building (c) of more than 30 metres high and is outside the City of London."*
  - *Category 3C - "Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which —( a) is used as a playing field at the time the relevant application for planning permission is made; or (b) has at any time in the five years before the making of the application been used as a playing field."*
3. Once Richmond upon Thames Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

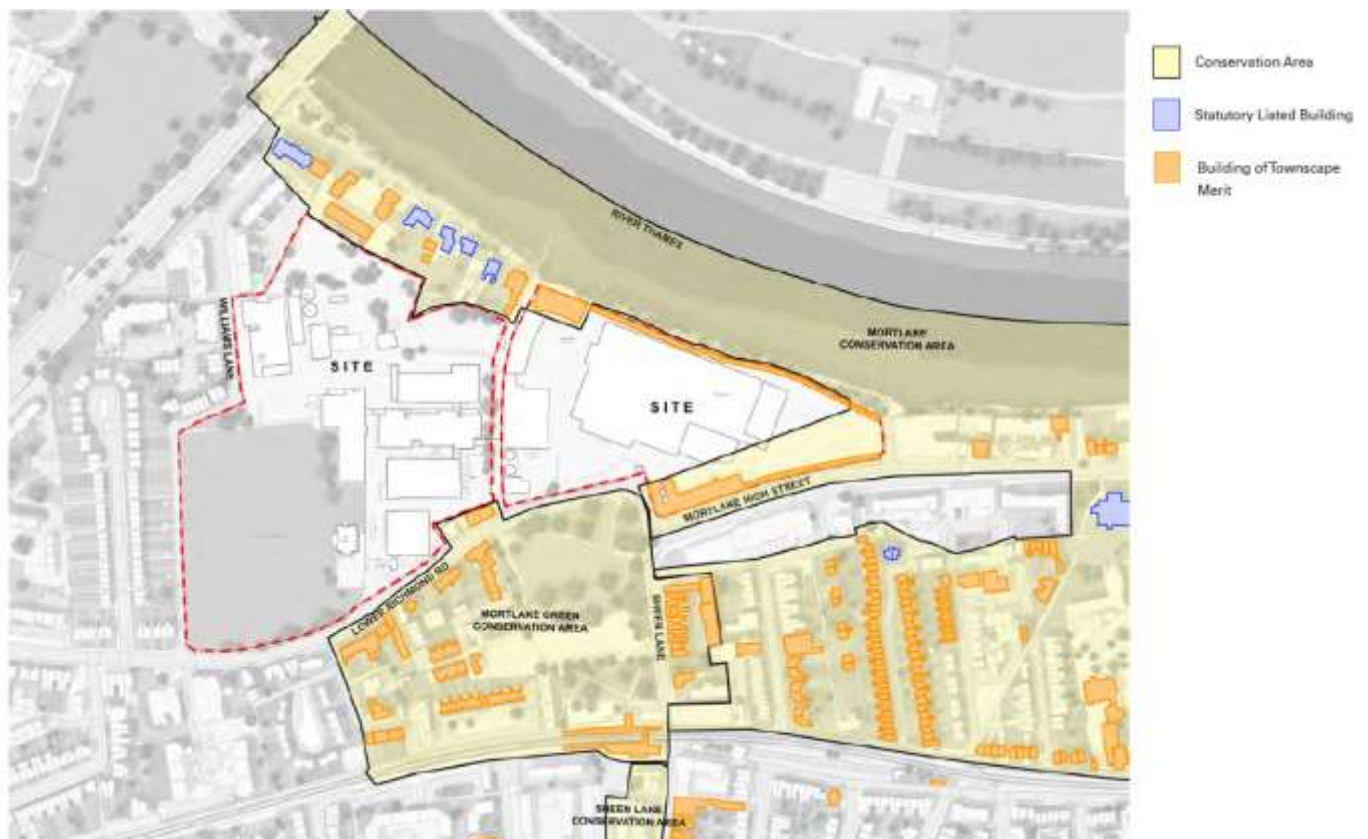
## Site description

6. The two application sites (A and B) comprise a total area of 8.6 hectares and comprises the former Stag Brewery and the Watney's Sports Ground. The site is bounded by the River Thames to the north; Lower Richmond Road / Mortlake High Street (A3003) to the south; Bulls Alley to the east; and Williams Lane to the west. The site is bisected by Ship Lane which runs north-south linking Lower Richmond Road with the Thames Path. This results in two parcels of land of approximately 5.5 hectares and 3.1 hectares in size.

7. The site is presently occupied by a mixture of industrial buildings of varying ages and scales, owing to the site's former and historical industrial use as a brewery. Continuous industrial use of the site as a brewery dates from the 1800's to the cessation of brewing activities on the site in 2015. Temporary approval has been granted for film production use of the site since the cessation of brewing activities.
8. Whilst a number of the industrial buildings on the site are of a modern and functional architectural character, there are three locally listed Buildings of Townscape Merit within the site:
  - the eight-storey Maltings building, constructed circa 1902, situated adjacent the River Thames on the eastern side of Ship Lane;
  - the three-storey former bottling building, constructed 1869, situated adjacent to Mortlake High Street on the site's southern boundary; and;
  - the three-storey former hotel building, dating from the late 19<sup>th</sup> century, which adjoins the bottling building at the corner of Mortlake High Street and Sheen Lane on the site's southern boundary.
9. The site is allocated for comprehensive mixed use redevelopment in the Richmond Local Plan (2018) and is also covered by the Stag Brewery Planning Brief SPD (2011), the key provisions of which are summarised in more detail below.
10. The Watney's Sports Ground is designated as 'Other Open Land of Townscape Importance' (OOLTI). This part of the site includes a private grass playing surface of approximately 2 hectares in area, as well as an associated two-storey sports pavilion building which is situated on the eastern flank of the turfed playing fields. The Thames Path is designated as public open space. The River Thames itself is designated as Metropolitan Open Land (MOL) and a Site of Importance for Nature Conservation.
11. There are no statutorily listed heritage buildings on the application site. Parts of the site lie within in the Mortlake Conservation Area as shown in Figure 1 below. The Mortlake Green Conservation Area is situated immediately adjacent to the site across Lower Richmond Road to the south of the application site and includes a small number of properties which adjoin the application site on the northern side of Lower Richmond Road to the immediate west of Ship Lane. The Grove Park Conservation Area is to the north within LB Hounslow.
12. To the north-west of the application site, situated on Thames Bank and stretching from the Ship Inn to Chiswick Bridge, are a series of larger residential dwellings ranging from two to three storeys in height. These houses are prominently visible from the River Thames and include the following listed buildings:
  - Grade II Listed Thames Cottage at 1 & 2 Thames Bank
  - Grade II Listed Tudor Lodge, Thames Bank
  - Grade II Listed Thames Bank House
  - Grade II Listed Leydon House, Thames Bank
  - Grade II Listed Riverside House, at 1-8 Thames Bank
  - Grade II Listed Garden Wall, east of 1-8 Riverside House and behind 1-24 Reid Court.
13. In addition to those listed above, the following additional listed properties are situated in close proximity to the main application site:

- Grade II Listed Gateway, formerly to Cromwell House, situated on Williams Lane approximately half way down the western boundary of the main application site.
- Grade II Listed Cottage buildings at 44 & 46 Victoria Road, situated approximately 65 metres south of Bulls Lane on the application site's eastern boundary.
- Grade II Listed Parish Church of St Mary, approximately 165 metres to the east of the site's eastern boundary, and on the southern side of Mortlake High Street.
- Grade II Listed Acacia House, at 115 Mortlake High Street.
- Grade II Listed house at 117 Mortlake High Street.
- Grade II Listed Suthrey House and attached Railings, at 119 Mortlake High Street.
- Grade II Listed Chiswick Bridge and Attached Balustrades.
- Grade II Listed Barnes Railway and Pedestrian Bridge.

Figure 1 – map of heritage assets



14. The site falls within a number of locally designated vistas in which the existing Maltings building is a designated landmark. This includes the view from Chiswick Bridge looking east towards the site. A further designated vista is from the Thames Path at Barnes looking west towards the site and the Maltings building. The section of the site close to the Thames path falls within the Thames Policy Area which also covers the existing buildings area to the east and west of the site.
15. The site has a public transport accessibility level (PTAL) ranging from 1a to 2, on a scale of 1 to 6b where 6b is the most accessible, although as noted in the

'Transport' section, a small part of the site does score PTAL 3. The centre of the site is situated approximately 800 metres north of Mortlake Rail Station. There is a single bus route (419) within walking distance using stops located on Lower Richmond Road/Mortlake High Street. Vehicle access to the site currently occurs via gated entry points on Williams Lane, Ship Lane and Lower Richmond Road (just north of its intersection with Sheen Lane - the B351).

16. In terms of the surrounding context, Mortlake Green is immediately to the south with Mortlake Station and East Sheen Town Centre within walking distance further to the south. The surrounding area to the east, south and west is predominantly residential in nature and characterised by a mixture of terraced housing and residential apartment buildings, which generally range between two and four storeys in height.
17. The site is situated within Flood Zone 3. However, the site benefits from flood defences including a flood defence wall which is situated on the northern boundary of the site and constructed from a mixture of existing boundary and building walls.

## **Details of this proposal**

18. The two planning applications are summarised as follows and shown on Figure 2 below:

### Application A – Main Masterplan scheme

19. Application A is a hybrid planning application for the comprehensive phased redevelopment of the site comprising:
  - Demolition of existing buildings (except the Maltings and the façade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks;

#### *Development Area 1*

- Detailed application for the works to the east side of Ship Lane which comprise:
  - 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 to allow for residential apartments; flexible use floorspace for retail, financial and professional services, cafe/restaurant and drinking establishment uses, offices, non-residential institutions and community use and boathouse; hotel / public house with accommodation; cinema and offices;
  - New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works;
  - Provision of on-site cycle, vehicle and servicing parking at surface and basement level;
  - Provision of public open space, amenity and play space and landscaping;

- Flood defence and towpath works; and
  - Installation of plant and energy equipment
20. Development Area 1 would provide 558 residential homes and up to a total of 4,839 sq.m. of flexible non-residential space.

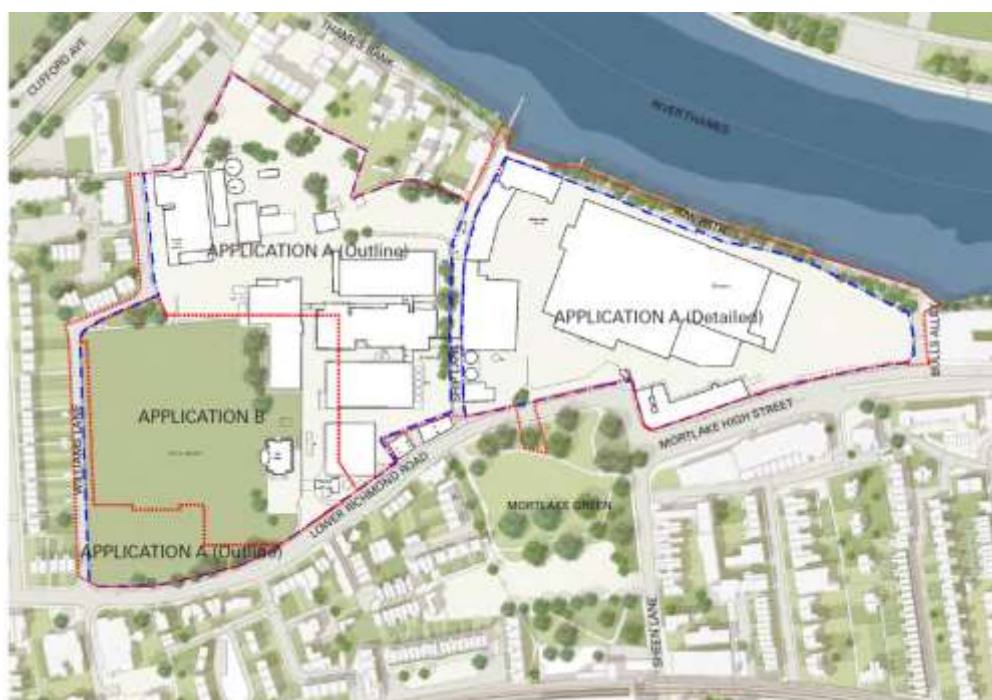
*Development Area 2*

21. Outline application, with all matters reserved for works to the west of Ship Lane which comprise:
- the erection of a single storey basement and buildings varying in height from 3 to 8 storeys
  - residential development
  - the provision of on-site cycle, vehicle and servicing parking
  - the provision of public open space, amenity and play space and landscaping, new pedestrian, vehicle and cycle accesses and internal routes, and associated highways works.

Application B: The school site

22. Application B comprises a detailed planning permission for the erection of a three-storey building to provide a new six form entry secondary school with sixth form which would accommodate approximately 1,200 students. Associated indoor and outdoor play and sporting facilities would be provided including roof level informal play facilities, an indoor sports hall, an external Multi Use Games Area (MUGA) and a full sized outdoor artificial playing pitch. This would be alongside other associated external works including landscaping, car and cycle parking, new access routes.

Figure 2 – Site boundary showing Application A and B and detailed and outline elements



## Case history

23. The site has a substantial planning history which is set out in detail in the Mayor's Stage 3 report which can be found on the GLA website [here](#). In summary, three planning applications were submitted by the applicant in January 2018, including Application A and B, together with a further Application C which covered highway works at Chalkers Corner. The applications proposed the comprehensive mixed use redevelopment of the site comprising 667 residential homes, 150 assisted living units and a nursing home, office, retail, cinema, hotel and community and commercial floorspace in buildings ranging from 3 to 8-storeys, together with a new 6-form entry secondary school with sixth form and redevelopment of the playing fields.
24. In January 2020, Richmond Council Planning Committee resolved to grant planning permission for Applications A and B, but resolved to refuse planning permission for Application C. All three applications were then subject to a direction under Article 7 of the Mayor of London Order which had the effect that the Mayor took over the determination of the applications. Amendments were made to the application to increase the height and massing and the number of homes and percentage of affordable housing as detailed in the Representation Hearing Report. Application C was later withdrawn by the applicant prior to the Representation Hearing.
25. Applications A and B were refused by the Mayor at a Representation Hearing on 27 July 2021 (LPA ref: 18/0547/FUL and 18/0548/FUL). The GLA officer report had recommended that the Mayor should grant planning permission. However, the Mayor did not agree with this recommendation. The GLA's decision notices issued on 17 August 2021 set out the following four reasons for refusal:

### Application A (main site) reasons for refusal:

- **Height, massing and visual impact** - The proposal, by reason of its height, scale, bulk and massing, 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.
- **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 less than substantial harm is not clearly and convincingly outweighed by the public benefits, including Affordable Housing, that the proposal would deliver.
- **Neighbouring amenity impact** - The proposal, by reason of the excessive bulk, scale and siting of Buildings 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 set out in the Design Code would not sufficiently mitigate these impacts.
- **Overall absence of a legal agreement** - The proposal, in the absence of a S106 agreement, would fail to deliver a range of environmental improvements,

community benefits and infrastructure to adequately mitigate the other harmful impacts of the development.

#### Application B (school site) reason for refusal

- The proposal is intrinsically linked to the development proposed within Application A, particularly in terms of the re-provision of designated Other Open Land of Townscape Importance (OOLTI), transport mitigation, safe and convenient access, comprehensive development and overall place-making. Application B in isolation would not constitute sustainable development

### **Strategic planning issues and relevant policies and guidance**

26. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Richmond Local Plan (2018) and, the London Plan 2021.
27. The following are also relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance.
  - The National Design Guide and the National Model Design Code.
  - On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#).
  - The Stag Brewery Planning Brief (2011)
  - Mortlake Village Planning Guidance (2015)
  - Buildings of Townscape Merit SPD (2015)
  - Conservation Area Statements – Mortlake, Mortlake Green, Sheen Lane Conservation Areas.
28. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
- Land use principles *London Plan; Social infrastructure SPG;*
  - Housing, affordable housing and play space *London Plan; Affordable Housing & Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy; Housing Design Standards draft LPG;*



- Urban design and heritage *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Public London Charter LPG; Housing Design Standards draft LPG; Fire Safety D12(A) pre-consultation draft LPG; Fire Statements D12(B) pre-consultation draft LPG; Fire Evacuation Lifts D5(B5) pre-consultation draft LPG;*
- Inclusive access and equalities *London Plan; Planning for Equality and Diversity in London SPG Accessible London: Achieving an Inclusive Environment SPG;*
- Climate change and sustainable development *London Plan; the London Environment Strategy; The control of dust and emissions in construction SPG; Circular Economy Statements LPG;*  
  
*Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring LPG; Urban Greening Factor draft LPG; Air Quality Neutral draft LPG; Air Quality Positive LPG;*
- Transport *London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG.*

## **Local Plan context**

### Local Plan Site Allocation

29. The site is subject to a Local Plan Site Allocation (SA 24) which seeks the comprehensive redevelopment of the site to provide the following:
- an appropriate mix of uses including residential, employment, education, commercial, health, community, sport, leisure and social facilities, as well as river-related uses.
  - the provision of a new 6-form entry secondary school, plus sixth form.
  - a 'new village heart and centre for Mortlake' with an appropriate mix of uses at ground level to provide active frontages, including cafe / restaurant uses and a 'substantial mix of employment uses, including low cost units suitable for small businesses.
  - the retention of the existing Buildings of Townscape Merit.
  - New links through the site including a new green space and high quality public realm to link the River Thames and Mortlake Green and integrate the site into the surrounding area and improve pedestrian and cycle connectivity.
  - Retention / reprovision / reconfiguration and improvement of the existing playing fields and locally designated open space (OOLTI).
  - Design response to relate to local character and have regard to the advice set out the Stag Brewery Development Brief SPD and Mortlake Village Planning Guidance SPD.

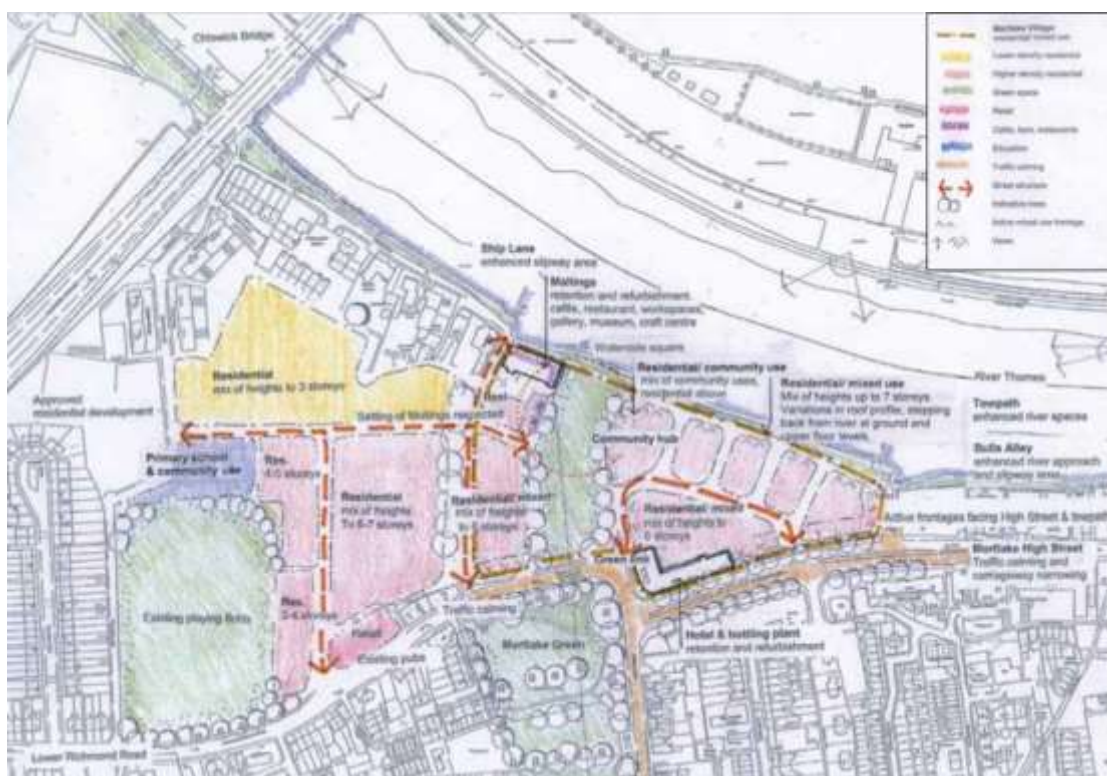
30. The site falls within the Mortlake Area of Mixed Use, as defined by the Richmond Local Plan. This is based on the redevelopment of the Stag Brewery site and seeks an appropriate mix of uses to generate vibrancy and local employment as well as leisure opportunities on the site. This includes restaurants, cafes, community uses, a museum, boat houses and affordable workspace for small businesses.

Stag Brewery Planning Brief

31. Redevelopment of the site is the subject of the Stag Brewery, Mortlake, SW14, Planning Brief Supplementary Planning Document (SPD) adopted July 2011. The planning brief outlines the Council’s Vision for redevelopment of the site with a mixture of land uses incorporating residential and commercial uses whilst establishing a new ‘village heart’ for Mortlake, as is set out in the Local Plan site allocation. Specific objectives of the planning brief for the site include:

- a single long-term masterplan for coordinating redevelopment of the site;
- the creation of a new green link between Mortlake Green and the River Thames;
- a mix of vibrant commercial uses, particularly in the eastern portion of the site, which should include a variety of employment, community and leisure activities;
- provision of affordable workspace and high-quality mixed tenure housing;
- reuse of buildings of townscape merit;
- an active and publicly accessible river frontage, noting the historic importance of the site as the finish of the Oxford versus Cambridge boat race;
- high quality, sustainable and inspirational design; and
- mitigation of transport and parking impacts on the surrounding area.

Figure 3 – indicative layout and land uses (Stag Brewery Planning Brief)



- As shown above, the SPD initially required a primary school on the site, which was later upgraded to a secondary school in the Council's Local Plan Site Allocation.

## Land use principles

### Loss of industrial floorspace

32. The former brewery was in industrial use and therefore comprises a non-designated industrial site for the purpose of London Plan Policy E7. However, the site has been allocated for mixed use development in the Local Plan and the proposed land uses (which does not include industrial floorspace) is in line with the land use aspirations set out in the Local Plan. Therefore, the loss of industrial floorspace capacity can be supported, in line with the criteria set out in Part C of London Plan Policy E7.

### Loss of playing fields

33. The Watney's Sports Ground is designated as 'Other Open Land of Townscape Importance' (OOLTI). The existing sports ground currently provides two unlit youth-sized grass pitches measuring 91 metres in length and 55 metres in width. There is also a small pavilion building which provides toilets and changing room facilities. The existing arrangement of sports facilities is detailed below. There is no formal public access to the sports facilities which were historically provided as a recreation facility for brewery employees. However, the facilities are utilised by the youth division of the Barnes Eagles Football Club, as well as both Thomson House School and the St Mary Magdalen School.
34. London Plan Policy S5 states that existing playing fields should be retained unless either: they are surplus to requirements; replaced with equivalent or better facilities; or development is for alternative sports and recreation uses where benefits would outweigh the loss of the current or former use.
35. The Local Plan site allocation states that the playing fields should be retained and/or reprovided and upgraded. It states that it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness, in accordance with local, strategic and national planning policy and Sport England Policy. The layout of the new secondary school and sixth form building is shown below.
36. The proposals include the following replacement sports and recreation facilities:
- A full size outdoor artificial playing pitch (64 metres x 100 metres) with floodlights and 3G surface to enable intensive school use and community use outside of school hours.
  - A Multi-Use Games Area (MUGA) – (26.5m x 36.3m)
  - 4 court sports hall meeting Sports England Specifications (34.5m x 20m x 7.5m)
  - Activity hall / Studio (150 sq.m.)
  - changing facilities (male, female and staff)
  - A new community park (Application A site area)
  - financial contribution towards improvements of alternative grass pitches.
  - A Community Use Agreement would secure the use of the facilities by the local community and sports groups out of school hours and in school holidays.

Figure 4 – Existing playing fields

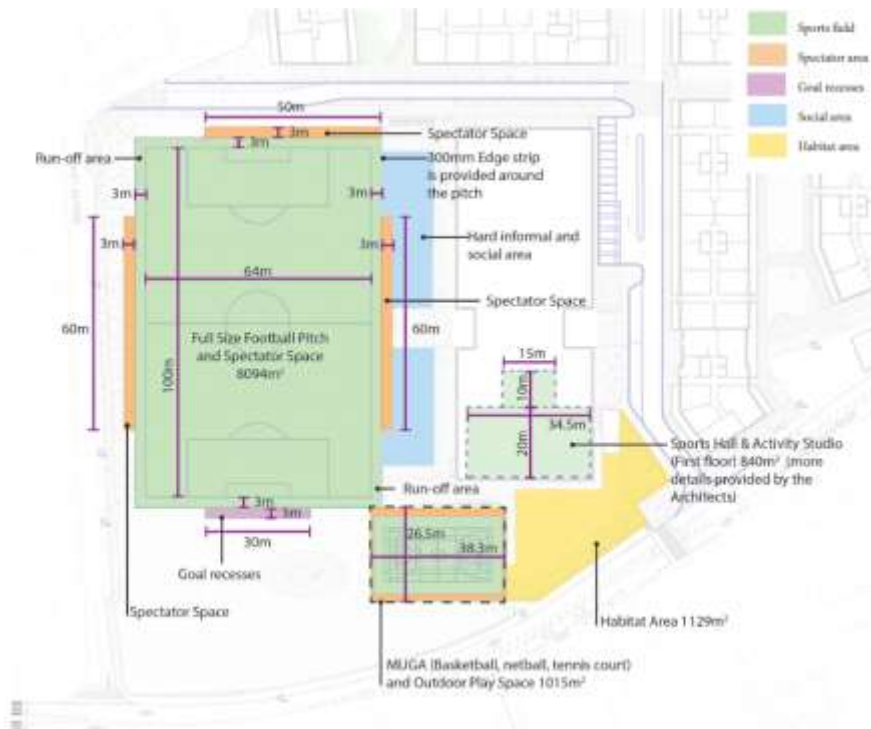


Figure 5 – Proposed playing fields



37. The dimensions and details of the proposed playing pitch and MUGA are the same as in the previous planning application and are shown in more detail below. Sports England previously confirmed that the proposals would satisfy the criteria set out in Exception Test 5 of the Sports England Guidance on the loss of playing fields. This is because the replacement facilities would meet an identified need for 3G sports pitches in the local area, and provide a more accessible and versatile sporting benefit to the local community, which in conjunction with the proposed floodlighting provides greater playing time and outweighs the loss of the existing private grass pitches.

Figure 6 – dimensions and design of replacement sports and play facilities



38. In terms of public access to the new sports facilities, the approach is understood to be in line with the provisions agreed in the previous application. The sports facilities would be primarily available year-round for use by the new school during operational hours and, outside of these times, the facilities would be made available for wider community use at the following times:
- 5pm – 9pm weekdays during school term time
  - 9am – 9pm during weekdays outside of school term time, and on Saturdays.
  - 9am – 8pm on Sundays and Public/Bank Holidays.
39. It was previously agreed that this requirement would be secured as part of a Community Use Agreement. Obligations and financial contributions were also agreed to ensure the ongoing use of the facilities by Barnes Eagles Football Club.
40. At Stage 3, GLA officers concluded that the loss of protected sports and recreation facilities could be outweighed by equivalent or better provision and that the scheme would comply with London Plan Policy S5, subject to the obligations and financial contributions being secured as detailed in the GLA's Stage 3 report. The conclusion of GLA officers on this matter is unchanged in respect of this application, given the details are the same.

#### Open space

41. As with the previous application, the existing 2.2 hectares of land designated within Richmond's Local Plan as 'Other Open Land of Townscape Importance' (OOLTI) would be replaced and redistributed across the site, as shown below. The application proposes 39,424 sq.m. of publicly accessible open space, including 27,272 sq.m. of publicly accessible green open space. This is alongside the courtyard space (7,693 sq.m.) and private amenity space (5,967 sq.m.). These figures are largely unchanged from the previous planning application, with minor amendments due to alterations in the building typology in blocks 20 and 21 (from apartment buildings to townhouses).
42. As noted above, the existing open space is private and is not fully accessible to the public. The reconfiguration of the open space is also envisaged in the Local Plan Site Allocation and Planning Brief SPD. At Stage 3, GLA officers concluded that the proposed rearrangement of OOLTI land would represent an increase in the quantum, quality, functionality and accessibility of public realm and areas of open land across the site and the application therefore complies with London Plan Policy G4. The same conclusion is reached on this application.

#### Housing supply

43. London Plan Policy H1 sets a London wide 10-year housing target for 522,870 net additional housing completions by 2029, with Richmond set a 10-year target of 4,110 homes during this period. The provision of 1,085 residential homes would make a significant contribution towards meeting these housing targets, with the proposed scheme equating to 26% of the Council's 10-year housing requirement.

#### Office, commercial and night-time economy uses

44. The range and type of non-residential use is broadly the same as with the previous application which was considered by the Mayor as detailed below. The cinema and

hotel are identical and the quantum of office and flexible commercial use broadly comparable. Whilst the town centre uses are not within a designated town centre, the proposals do accord with the land use objectives set out in the Local Plan Site Allocation and Mortlake Area of Mixed Use Designation.

Table 1 – proposed non-residential floorspace sq.m. (GIA) compared to previous applications

Use	Previous application considered by Richmond Planning Committee in 2020	Revised scheme refused by the Mayor in 2021	This application 2022
Flexible use	4,686	5,023	<b>4,839</b>
Office	2,424	5,523	<b>4,547</b>
Gym	740	0	<b>0</b>
Cinema	2,120	1,606	<b>1,606</b>
Hotel	1,673	1,765	<b>1,765</b>
<b>Total</b>	<b>11,643</b>	<b>13,917</b>	<b>12,757</b>

45. The applicant is proposing the following maximum and minimum caps on floorspace provision. This is acceptable. Affordable workspace was agreed (circa 10% of the office floorspace) on the previous application and should be secured. Conditions should be secured to limit the size of ground floor commercial units.

Table 2 - Proposed minimum and maximum caps in sq.m. (GIA):

Land use	Minimum cap	Maximum cap
Retail (Class E)	-	2,200
Financial and professional services (Class E)	-	220
Cafe / restaurant	-	2,400
Drinking establishments (sui generis)	-	1,800
Offices (Class E)	2,000	2,200
Community (Class F1)	-	1,300
Boathouse (sui generis)	-	380

46. Night-time economy uses are proposed in the form of a cinema and pub / bar. These are as was proposed in the previous planning application considered by the Mayor. The overall mix, quantum and distribution of commercial, office, leisure and community use is in general accordance with the aspirations set out in the Local Plan Site Allocation, Planning Brief and the Mortlake Area of Mixed Use designation and would not conflict with policies in the London Plan relating to office and business uses and promoting town centres and the night time economy.
47. No issues arise in terms of the Agent of Change principle and the requirements of London Plan Policies D13 and D14 in relation to the Ship Public House and Jolly Gardeners Public House.

## Education use

48. Application B is identical to the previous application considered by the Mayor and would propose a new 6-form entry secondary school with sixth form. The school would provide for up to 1,200 pupils, with 900 pupils in years 7-11 and approximately 250 pupils in sixth form.
49. The provision of a new secondary school is required by the site allocation. The need for the secondary school was determined by the Council following an assessment of future school place demand and capacity. This upgraded the requirements on the site in terms of education provision, as the Planning Brief SPD only required a new primary school.
50. London Plan Policy S3 states that boroughs should ensure there is a supply of good quality education facilities based on need assessments and sets out criteria in Part B which should be applied to development proposals for new schools. A number of objections were raised on the previous application in relation to the provision of a new secondary school on this particular site in terms of the potential impact on amenity, open space, transport, traffic congestion and air quality impacts, the GLA's Stage 3 report considered the proposals to be in accordance with local, strategic and national planning policy requirements. The same conclusion is also reached on this application.

## Conclusion – land use principles

51. The comprehensive mixed use redevelopment of the site including the proposed land uses is in line with the land use objectives set out in the Local Plan Site Allocation and Planning Brief SPD and would accord with London Plan Policies H1, E7, S3, S5, G4 and SD6.

## **Housing and affordable housing**

52. The Mayor has set a strategic target for 50% of all new homes to be affordable, as set out in Policy H4 of the London Plan. Policy H5 of the London Plan identifies a minimum threshold of 35% affordable housing (by habitable room), with a higher threshold of 50% applied to public sector owned land and industrial sites where the scheme would result in a net loss of industrial capacity. Applications which do not meet these requirements should follow the Viability Tested Route and subject to both early and late stage review mechanisms and in the case of large phased schemes, a mid-term review. The application is subject to the 50% threshold in the London Plan as the site comprises former industrial land.
53. Richmond's Local Plan Policy LP36 states that 50% of all housing units will be affordable comprising a tenure mix of 40% of affordable rent and 10% affordable intermediate products (i.e. 80% of all affordable housing as affordable rent, and 20% as intermediate). Former employment sites are expected to provide at least 50% on-site affordable housing.
54. The applicant's Design and Access Statement (page 55) and Planning Statement (Appendix D) states that the revised application is proposing 23% affordable housing by habitable room with a 83:17 tenure mix weighted towards social rent (20% by unit, with a 77:23 tenure mix).

55. However, following submission of the application the applicant has since confirmed that this does not represent their affordable housing offer which it has confirmed is 15% affordable housing by unit (17% by habitable room), with the tenure mix being 20% social rent and 80% intermediate shared ownership. This proposal would equate to the following in terms of units:

Table 3 – proposed affordable housing (by unit)

	Units	%
Market	918	85%
Intermediate shared ownership	134	12%
Social rent	33	3%
<b>Total</b>	<b>1,085</b>	
<b>Total affordable</b>	<b>167</b>	<b>15%</b>

56. The currently proposed quantum and tenure mix of affordable housing is wholly unacceptable. The quantum of social rent on the proposed scheme is just 3% (33 homes), despite this being the Council's preferred affordable housing tenure as set out in the Local Plan.
57. The overall level of affordable housing should be significantly increased and the tenure mix should be revised so that it is weighted in favour of social rent, given the local and strategic affordable housing policies and evidence of housing need and affordability issues.
58. The table below sets out how the revised scheme compares to the original planning application considered by Richmond Council in 2020 and the revised application which was considered by the Mayor at a Representation Hearing in 2021. It unclear why the number of market homes in the current scheme has increased to 918 (+24 homes) and yet the number of affordable homes has more than halved numerically (-189 homes), with the tenure split worsened substantially. The tenure proposed is now weighted substantially in favour of intermediate in contrast to the scheme which was considered by Richmond Planning Committee in 2020.

Table 4 – affordable housing provision compared to previous planning applications

Housing tenure	Richmond 2020	GLA 2021	Revised 2022
Market	525	894	918
Low cost rent	110	127	33
Intermediate	28	148	134
Discount Market Rent	0	81	0
Assisted living	150	0	0
<b>Total homes</b>	<b>813</b>	<b>1,250</b>	<b>1,085</b>
<b>Affordable homes</b>	<b>138</b>	<b>356</b>	<b>167</b>
<b>% AH by unit</b>	<b>17%</b>	<b>28%</b>	<b>15%</b>
<b>Tenure mix</b>	<b>80:20</b>	<b>64:36</b>	<b>20:80</b>

59. The applicant's updated Financial Viability Assessment (FVA) concludes that the scheme with 17% affordable housing by habitable room, with the proposed tenure



split heavily weighted in favour of intermediate housing, is not viable. This has been assessed against a profit requirement of 20% of the Gross Development Value (GDV) of the market housing. This profit level has not been substantiated and is considered excessive.

60. There are a number of elements to the scheme that impact on the viability including the large basement car park and the cinema. They are included in the assessment at significant cost but at values much lower than these costs. For example, according to the applicant's FVA, the basement would cost circa £66.9 million to construct yet only generates a value at approximately £20.4 million. Similarly, the capital cost of the cinema (including £1 million fit out costs) equates to circa £6.9 million yet only generates a value of £4.1 million.
61. Clearly, the design decision to incorporate such a large basement within the scheme has a substantial impact on the overall viability of the scheme. Whilst this has design benefits in terms of the quality of the public realm and the reduction in on-street car parking and vehicle movements within the site, the scheme could have been designed to minimise the need for a basement, for example, by incorporating lower levels of standard car parking spaces and incorporating cycle parking and disabled car parking within ground floor podiums wrapped with active residential and non-residential uses at ground floor level. Given the impact on viability, this design decision should be fully justified and the applicant should be required to demonstrate that the provision of the basement in this instance has not come at the cost of affordable housing provision within the scheme.
62. The applicant sets out that this scheme will provide 'a new village heart for Mortlake based upon buildings and open public realm of the highest quality' and the large basement and the cinema are justified as part of the overall concept for this scheme. However, this is not reflected in their assumed values.
63. The outcome of the applicant's FVA assumes a large deficit which may indicate the under valuation and/or the sub optimisation of the scheme. The applicant has not demonstrated that the scheme is deliverable and that the inputs and overall valuation should be cross-checked against market transactions. It would be appropriate for the target profit to be cross checked against other measures including the Internal Rate of Return to ensure the outcome of testing is robust and it is also important for growth to be modelled on a scheme of this size.
64. At this stage, GLA officers consider that it is likely that both the quantum of affordable housing can be increased and the tenure mix improved in favour of social rent, if both the placemaking potential and future growth are taken into account in the residential values and the scheme is measured against a more realistic developer's return. However, the GLA have not yet concluded their review as the borough's cost review has not been provided to date.
65. GLA officers consider that additional affordable housing units could be accommodated within the same envelope in Building 18 (which is designated as an affordable housing block). This would increase the overall quantum of affordable housing as well as generating additional value for the scheme. The residential homes within Building 18 are substantially larger than the minimum size standards set out in the London Plan and compared to affordable homes located in similar mansion block typologies set within schemes reviewed by the GLA. The applicant should further investigate the potential to include additional affordable homes in

Building 18 within the proposed building footprint and layout whilst maintaining generously sized units and retaining the unit mix proportions set out in the applicant's unit schedule and also avoiding any directly north-facing single aspect units, in line with London Plan Policy D6. This optimisation work should be undertaken at application stage, in line with London Plan Policy H4 which expects all schemes to maximise the delivery of affordable housing which should then be secured from the outset via S106 obligations.

66. In addition to this, GLA officers are concerned that the applicant is proposing Block 18 as one of the first phases of the scheme, yet it is shown in outline rather than in detail. Further explanation should be provided on this issue.

#### Mid review

67. A mid-stage viability review should be secured given the size and quantum of housing proposed which would involve numerous blocks and phases. The mid-review should be secured, in line with the London Plan and the Mayor's Affordable Housing and Viability SPG.

#### Affordability

68. Policy H6 of the London Plan sets out the Mayor's preferred affordable housing tenures, which includes social rent/London Affordable Rent; London Living Rent and London Shared Ownership. Paragraphs 4.6.3 to 4.6.10 of the London Plan sets out the Mayor's definition of genuinely affordable housing by tenure. The following key comments are made in terms of tenure and affordability:
- Low-cost rent products should be secured at social rent or London Affordable Rent (LAR) levels, in line with the published LAR benchmarks. These are significantly less than the NPPF definition for affordable rent, which is not considered affordable as a low cost rent product in London.
  - London Shared Ownership units should be affordable to households on incomes up to a maximum of £90,000 a year and a range of affordability levels should be provided below the maximum £90,000 household income cap.
  - All intermediate tenure households should not be required to spend more than 40% of their net income on overall housing costs, including service charges.
  - Should any intermediate rent products, such as Discount Market Rent (DMR) or London Living Rent (LLR) be subject to a maximum income cap of £60,000, with a range of incomes secured below the maximum cap for any DMR units.
  - Generally shared ownership is not appropriate where market values of the new homes are likely to exceed £600,000 as set out in the Mayors Affordable Housing & Viability SPG. Where this is the case, for example, homes should be provided as intermediate rent (either London Living Rent or Discount Market Rent).
  - On the previous application, GLA officers negotiated intermediate housing at a range of income levels as set out in paragraph 324 to 329 of the GLA's Stage 3 Hearing Report. These key obligations ensured that the affordable housing

tenures complied with the Mayor's definition of genuinely affordable housing as set out in the London Plan.

### Children's play space

69. Play space requirements have been calculated using the GLA's play space calculator and based on the required standard of 10 sq.m. of play space provision per child. The site wide requirements for the revised scheme are based on 548 children and 5,480 sq.m. of play space. Excluding the school, the scheme proposes 7,470 sq.m. of play space provision, and the requirements overall and by age category are met. Including the school, 10,374 sq.m. of play provision would be provided. Play provision would be distributed across the site, including within the public realm and residential courtyards. The scheme would comply with the requirements set out in London Plan Policy S4.

## **Urban design**

### Design, layout, public realm and landscaping

70. Policies D1-D3 and D8 of the London Plan and the Mayor's Housing SPG apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes and the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages.
71. The overall layout, public realm and landscaping of the scheme is broadly the same as in the previous application which was determined by the Mayor in 2021. The proposed layout and quality of public realm is in line with the principles and objectives set out in the Stag Brewery Planning Brief SPD and the design policies set out above in terms of creating a well-integrated, legible network of streets and public open spaces which are well-activated with mixed uses and stitch the site back into the surrounding area, linking the River to Mortlake Green.

### Residential quality

72. The scheme proposes 50% single aspect units. The vast majority of single aspect homes are east and west facing. However, the revised scheme includes 4% north facing single aspect units. This is a reduction compared to the scheme which was considered by the Mayor at the GLA Representation Hearing. The single aspect units would generally be one or two-bedroom apartments with shallow plans and generous frontages. Mansion blocks are articulated to provide bay windows to enable 'enhanced' single aspect with multiple glazed facades facing different directions.
73. The majority of residential units will meet or exceed the minimum requirement for private outdoor amenity spaces through a mixed provision of ground floor terraces, balconies and external roof terraces. Instances where private amenity space is not achieved are largely limited to residential units situated in the Maltings Building, where heritage considerations have made the installation of external balconies undesirable. This is acceptable given the heritage constraints which prohibit adding balconies to this building. The quantum of internal space within these dwellings would exceed the minimum internal standard so compensates for this.

74. Distances between the blocks range from approximately 30 metres to more narrow spaces ranging from 13.5 metres to 10 metres. Privacy and overlooking issues have been minimised through the design, location and orientation of glazing and bedrooms, living rooms and balconies. However, further detailed mitigation measures are required via conditions and in terms of the detailed design.

### Heritage

75. Whilst the redistributed massing of the scheme has reduced the impact on the setting of a number of the heritage assets in key views from the River, GLA officers consider that the application would still result in less than substantial harm to the significance of heritage assets as a result of the following impacts:
- Loss of some historic fabric in the Maltings Building resulting from works necessary for its adaptation from industrial to community and residential uses;
  - Loss of some historic building fabric in the Former Hotel and Former Bottling Plant;
  - Demolition of the majority of former brick boundary walls;
  - Harm to the significance of the Mortlake Conservation Area owing to impact on setting from height and massing and to the setting of the Maltings Building when viewed from Chiswick Bridge and Chiswick Bank;
  - Harm to the significance of the Grade II listed residential properties situated on Thames Bank between Ship Lane and Chiswick Bridge, including Thames Cottage, Tudor Lodge, Thames Bank House, Leydon House and Riverside House owing to impact on setting from the proposed height and massing of the scheme;
  - Harm to the significance of the Mortlake Conservation Area and Mortlake Green Conservation Area and the Former Bottling Building and Former Hotel Building owing to the impact of the proposed development on the setting of these heritage assets setting impact when viewed from the south.
76. The scheme would provide the following heritage benefits:
- The adaptation and re-use of the Maltings Building with ongoing viable uses (including community facilities).
  - The restoration of the most significant facades of the Former Hotel and Former Bottling Plant buildings, and their incorporation within the new development.
  - Use of the retained portions of the Former Hotel Building in a newly proposed hotel, returning the historic use to the site.
  - Retention and re-use of heritage features within the site including the existing brewery gates and memorial plaques.
77. In accordance with the NPPF, incidences of 'less than substantial harm' should be weighed against the public benefits of the proposal, including heritage related public benefits. Considerable weight and importance must be attached to the harm caused by the proposals to surrounding heritage assets in any balancing exercise. As the application would harm heritage assets, the proposals conflict with London Plan Policy HC1.

78. When considering the previous planning application in 2021 in the GLA's Stage 3 Representation Hearing Report, GLA officers set out a number of public benefits which weighed in favour of the scheme, as set out in paragraph 701 of the Representation Hearing Report. Weight was given to the provision of additional housing and affordable housing across the site which, at that time, comprised 28% affordable housing by unit / 30% by habitable room (127 low cost rent homes and 148 intermediate homes). However, in this application only 15% affordable housing by unit (17% by habitable room) is proposed which would comprise 33 low cost rent homes and 134 intermediate homes. As a result, GLA officers consider that significantly less weight can now be given to the provision of affordable housing on the scheme as a public benefit. The extent to which the public benefits can be given weight in the balancing exercise can only be determined at Stage 2.

#### Density and design review

79. GLA officers understand that design reviews have been undertaken on the revised application at pre-application stage. The Design Review Panel (DRP) was generally supportive of the underlying urban design and masterplanning principles for the site and the redistribution of the height and massing, except for the proposed height increase to Block 10 which the Panel considered would have a dominant effect on the retained historic bottling building. The DRP also expressed concerns regarding a number of issues including the number of single aspect and north facing single aspect units; privacy and overlooking distances between habitable rooms; the site's urban greening factor score; and the architectural approach proposed for mansion blocks and warehouse apartment buildings which did not have enough detail and richness.

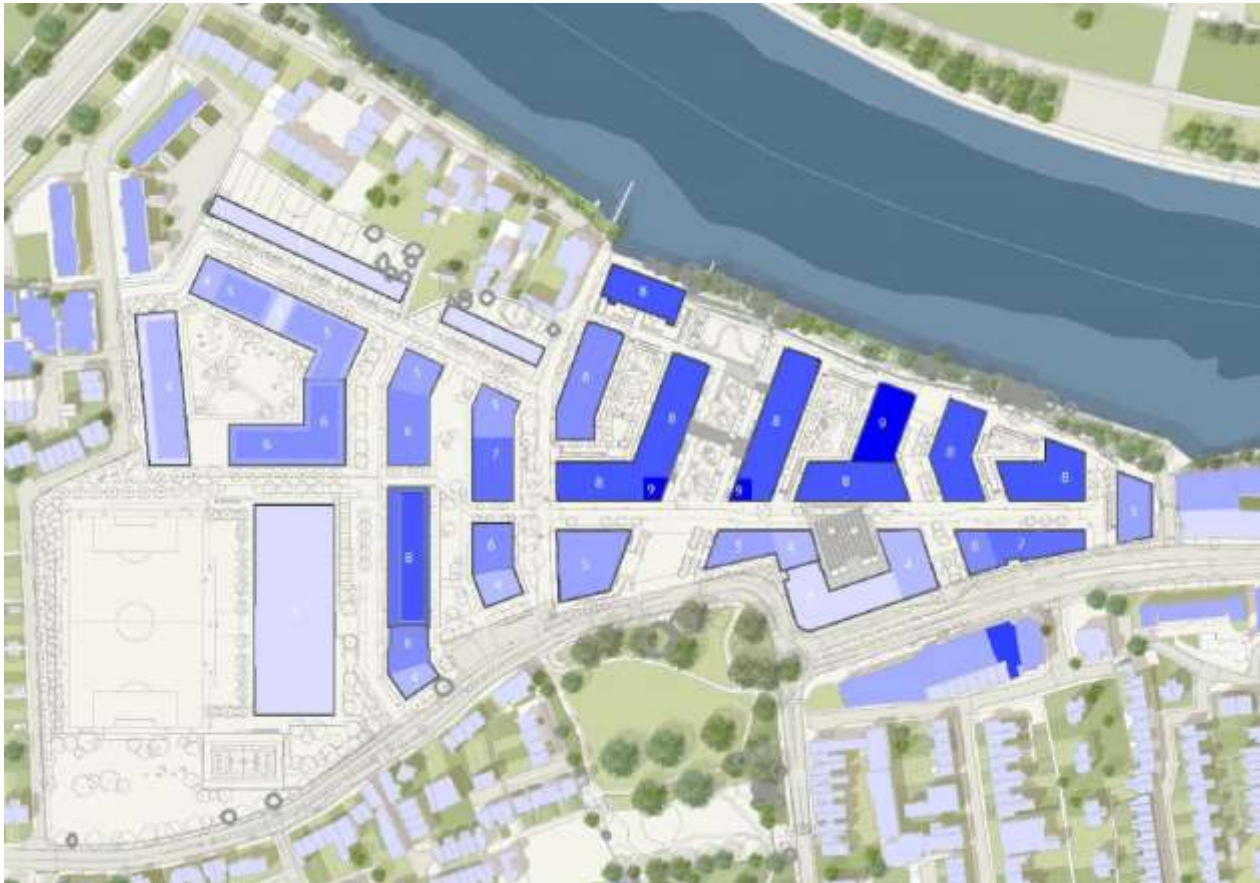
#### Height, massing and tall buildings

80. London Plan Policy D9 seeks to ensure that there is a plan-led approach to the development of tall buildings across London and that the visual, functional, environmental and cumulative impacts of tall buildings is appropriately considered to avoid adverse or detrimental impacts.
81. Part B of Policy D9 states that boroughs should determine which locations are appropriate for tall buildings (subject to meeting the other requirements of the Plan) and states that tall buildings should only be developed in these suitable locations.
82. Part C of Policy D9 sets out qualitative criteria for assessing the visual, functional, environmental and cumulative impacts and design quality of tall buildings. Tall buildings should achieve exemplary architectural and materials quality and should contribute positively to the character of the area, aid legibility and wayfinding and have a positive impact on the public realm. Tall buildings should avoid harm to heritage assets and should not adversely affect local or strategic views. Environmental impacts including wind, microclimate, daylight/sunlight, glare impacts should be assessed. Cumulative visual, function and environmental impacts should also be assessed. Development near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.
83. In terms of the local planning policy context, Policy LP2 of Richmond's Local Plan defines tall buildings as those of 18 metres (six storeys) in height or taller. The

policy also defines 'taller' buildings as those significantly taller than the neighbouring buildings, but less than 18 metres in height. The Local Plan identifies Mortlake Brewery as being one of a select few specific and exceptional sites outside Richmond and Twickenham centres, where 'tall' and 'taller' buildings may be appropriate in principle.

84. The Stag Brewery Planning Brief SPD (2011) envisages building heights on the site ranging from 3 to 7-storeys with 3, 4 and 5-storey buildings to the west of the site closest to the playfields and nearby residential properties. To the east of Ship Lane a range of heights up to 6 to 7-storeys are expected. In general, the SPD states that taller buildings should be generally located at the core of the site and the height and scale should diminish towards the perimeter of the site or along the Riverside.
85. The proposed height and massing is shown below. The development would range in height between 3, 4, 5, 6, 7, 8 and 9-storeys. The previous scheme which was refused by the Mayor ranged in height from 3 to 10-storeys. Moving west to east across the scheme, the key changes compared to the refused scheme considered by the Mayor in 2021 are as followings:
  - Blocks 20 and 21 – reduction in height from 4 to 3-storey, with terraced homes now proposed instead of mansion blocks.
  - Block 19 – reduction of 6-storey element to 4 and 5-storeys and reduction of 7-storey element to 6-storeys
  - Block 15 – introduction of a 7-storey recess on the western side of the block adjacent to the school building.
  - Block 16 – reduction in height from 6 and 8-storeys in the refused scheme to 5 and 6-storeys in the revised scheme.
  - Block 03 – reduction in height from 7 to 6-storeys
  - Block 04 – reduction in height from 8 and 9 -storeys with a 10-storey pop-up element on the southern corner to 8-storeys with a 9-storey pop-up element in the revised scheme.
  - Block 07 – reduction in height from 9-storeys with a 10-storey pop-up element to 8-storeys with a 9-storey pop-up in the revised scheme.
  - Block 08 – reduction from 9-storeys to 9 and 8-storeys in the revised scheme.
  - Block 11 – reduction from 10-storeys to 8-storeys.
  - Block 12 – increase in the western side of the block from 7 to 8-storeys
  - Block 10 – increase in height from 5 to 6-storeys in the refused scheme to 6 to 7-storeys in the revised scheme.
  - Block 05 – reduction in height of part of the block to the west of Bottleworks Square from 5 to 4-storeys.
  - The height of the school building and Block 01 which comprises the cinema is unchanged.

Figure 7 – proposed height and massing



86. In terms of London Plan Policy D9, the Council's Local Plan envisages the potential for 'tall' and 'taller' buildings on the site. As such, the principle of tall and taller buildings on this site is in line with the locational requirements set out in Part B of London Plan Policy D9. The site allocation does not prescribe any maximum or minimum heights. However, it does state that any proposed development should have due regard to the adopted Planning Brief SPD (2011) which is a material consideration but not part of the Development Plan. At up to 9-storeys the proposed scheme would exceed the recommended heights set out in the Planning Brief SPD. In terms of the criteria set out in Part C of London Plan Policy D9, the scheme would still harm heritage assets and impact locally designated river views and the surrounding townscape. These and other environmental and residential amenity impacts should be fully considered by the Council in its Planning Committee Report, taking into account the conflict with the heights set out in the Planning Brief SPD.

#### Fire safety

87. A fire statement has been prepared by a third party suitably qualified assessor and submitted as part of the planning application, as required by London Plan Policy D12. This sets out the proposed approach in terms of building construction, means of escape, passive and active fire safety systems and access and facilities for fire fighting services. Sprinkler systems would be provided in all buildings and land uses. Further detailed fire statements would be provided and secured at Reserved Matters Stage. This information provided meets the requirements set out in London Plan Policy D12.

## Inclusive access

88. The application would comply with the accessible housing standards in the London Plan Policy D7. This should be secured by condition. An inclusive design statement has been provided which details how the scheme would achieve a high quality of inclusive access throughout the land uses proposed and the detailed and outline elements.

## **Transport**

### Site access

89. The proposed vehicle access arrangements to the site are the same as was proposed in the previous application. Access to the eastern side of the site will be via Ship Lane and a new priority junction on Mortlake High Street immediately east of the entrance to the underground car park (opposite Vineyard Path). Access to the eastern side of the development will also be via Ship Lane with secondary access from Williams Lane. In addition, a new access road is proposed from Lower Richmond Road immediately east of the proposed school which connects to both Ship Lane and Williams Lane. Access to the school is also from this new road.
90. Vehicular routing to the development site is limited by the presence of the River Thames to the north and the railway line to the south. Vehicles will predominately access the site via Lower Richmond Road/ Mortlake High Street from Chalkers Corner or from Sheen Lane via the A205 Upper Richmond Road.

### Healthy Streets

91. The proposed development will generate an increase in pedestrian and cycle trips to and from the site and the local area. The redevelopment of the site will see the creation of a new network of streets, which will significantly improve permeability and connectivity through the site. The vast majority of car parking is located at basement level, which would ensure streets are largely car free and pedestrians and cyclists have priority over other modes within the site.
92. The proposals include a number of off-site improvements including new and improved zebra crossing facilities, a new signalised crossing facility on Lower Richmond Road near the school, and improvements to the existing signalised crossing on Lower Richmond Road. Whilst the improvements identified will contribute towards the Healthy Streets and Vision Zero approach, the Transport Assessment (TA) and Active Travel Zone assessment highlights a key pedestrian and cycle desire line from the north west corner of the site across the A316 Clifford Avenue towards Kew (including Kew Gardens underground station). There is currently no formal pedestrian/cycle crossing facility on Clifford Avenue north of Chalker's Corner. Given the uplift in pedestrian and cycle movement generated by the development, a formal signalised toucan crossing facility would be of direct benefit to this development. TfL will therefore seek a contribution to deliver a crossing at this location.
93. Furthermore, the TA also highlights a key pedestrian / cycle desire line along the A316 Clifford Avenue towards Chiswick Bridge. The TA refers to the TfL Quietway along the A316, however this scheme was never implemented. As a result, the current widths of the shared footway/cycleway along the A316 Clifford Avenue are



unlikely to meet current design guidance standard for the expected pedestrian and cycle volumes, as there have been changes to the guidance since the original application. TfL recommend the applicant reviews the shared footway cycle way between Chalker's Corner and Chiswick Bridge to ensure it meets current standards and if not develop proposals to bring it up to current design standard.

94. To improve road safety and pedestrian and cycle facilities, TfL have designed several proposed improvements within the A205 Upper Richmond Road / Sheen Lane junction. As the development proposal will generate additional vehicle, cycle and pedestrian movements through this area, a financial contribution of £228,878 towards the implementation of this scheme should be secured in the s106 agreement.
95. Subject to securing the above, these improvements will contribute to the Mayor's Healthy Streets agenda for encouraging active travel and mode shift away from the private vehicle and therefore accord with London Plan Policy T2.
96. A section 278 Agreement under the Highways Act 1980 is required to be secured for any works on the public highway. An updated Stage 1 Road Safety Audit will also be required for any changes to the public highway. The removal of TfL street trees requires agreement by TfL along compensation for the removed asset, this should be secured by condition.

#### Car parking

97. A total of 516 car parking spaces are proposed on site, including 423 spaces for the residential uses. This equates to a car parking ratio of 0.39 spaces per unit. This represents a slight increase (16 spaces) compared to the called-in scheme. Most of the spaces are located within a basement car park. A further 15 spaces are proposed for the secondary school and 78 spaces for the non-residential uses on site. Whilst the proposed car parking for all uses is in accordance with London Plan Policy T6, it is not clear why the residential car parking provision has increased when compared to the called-in scheme given that the total number of units has reduced by 167. This should be clarified.
98. It is proposed that 20% of all car parking spaces will include active charging facilities with passive provision for all remaining spaces. This is acceptable. Residential disabled persons parking will be provided in accordance with London Plan policy, which requires provision for 3% of dwellings at the onset, with up to 10% provided should demand arise. 10% of the non-residential parking bays will be provided for disabled parking from the outset. An outline Car Parking Management Plan (CPMP) has been provided, the detailed CPMP should be secured by condition or via the s106 agreement.
99. In order to prevent potential overspill car parking from the development, it is recommended that an extension of the existing CPZ's is considered to include all roads up to Chalker's Corner. It is recommended that all future residents are exempt from applying for car parking permits and for this to be secured through an appropriate legal planning restriction.

### Cycle parking

100. The applicant is proposing a total of 2,413 long-stay cycle parking spaces on site, and a further 284 short-stay spaces for all elements of the development. This is in accordance with London Plan policy T5. 25% of the long-stay spaces will be provided as Sheffield stands, and 5% of these will be able to accommodate larger cycle. All cycle parking, and the provision of shower and locker facilities for the non-residential elements should be secured by condition along with a requirement to ensure that all cycle parking is designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS). A cycle hub for the non-residential uses is proposed within the basement car park. This should be secured by condition.
101. The applicant has safeguarded an appropriate area of land that can be converted to cycle hire, should TfL's cycle hire network be extended to the site in the future, this should be secured in the s106 agreement

### Trip generation

102. The applicant has used the same trip generation methodology used for the previous schemes. Given the date of the initial assessment, a sense check of the trip generation to ensure that it is using the most up to date survey sites and is still robust. The submitted methodology concludes that the revised development is likely to generate an additional 2,410 two-way person movements during the weekday morning peak (0800 to 0900), and approximately 1,983 two-way movements during the evening peak (1700 to 1800). Of these, it is predicted that there will be 328 two-way vehicle trips in the AM peak hour and 224 in the PM peak hour. This represents a slight increase (+2) in vehicle trips in the AM peak period and a slight reduction (-1) in the PM peak hour when compared to the called-in scheme. The majority of additional movements from the proposal are predicted to be public transport trips (1,012 two-way trips in the AM peak hour and 674 in the PM peak hour) and walking and cycling trips (977 two-way in the AM peak hour and 948 in the PM peak hour).
103. The secondary school trip generation assessment has not changed from the called-in scheme and remains fit for purpose.

### Highways impact

104. The development is expected to generate a net increase of 328 two-way vehicle trips in the AM peak hour and 224 during the PM peak hour, including delivery and serving trips. 152 of the predicted two-way vehicle trips are associated with the school in the AM peak hour and 23 in the PM peak hour.
105. In order to test the impacts of the vehicle trips generated by the development, detailed traffic network and junction modelling was undertaken as part of the original application assessment. LINSIG modelling software was used to support the original planning application, and VISSIM microsimulation modelling software, with a cordon taken from TfL's strategic models for forecast years, was used for the revised and called-in schemes. This modelling was undertaken using 2017 traffic flows, as the emerging COVID situation meant more recent traffic survey data were not able to be collected for the called-in scheme, and was assessed alongside bespoke analysis to understand the impact of issues such as the Hammersmith

Bridge closure. However, since the restrictions associated with the collection of new data was lifted in May 2021, TfL strongly recommends the assessment of this development reverts to standard practises and established methodologies, using recent survey data and the latest forecast assumptions as required by TfL VISSIM Model Auditing Process (VMAP) standards. It should be noted that this may take several months to complete.

106. Additional comments may be issued by TfL once the modelling has been updated with new traffic data. It is for the local highway authority to comment on the suitability of the assessment and impact to the local highway network.

## Public Transport

### *Bus Capacity*

107. There are seven bus routes within walking distance of the site: 419, 190, 209, 355, R68, N22 and 969, although it is noted the 969 only operates twice a week. The proposed development is predicted to generate a total of 663 two-way bus trips in the AM peak and 260 two-way bus trips in the PM peak hour. The majority of the predicted bus trips are associated with the proposed secondary school (510 in the AM peak hour and 65 in the PM peak hour). TfL have re-assessed the uplift in demand based on current capacity and conclude that additional buses would still be required to accommodate the predicted level of demand generated by both the revised development and secondary school. The revised development would potentially require 2 additional return journeys in both the AM and PM peak hours; and a further 8 school services in the AM peak hour and 2 in the PM peak hour to accommodate secondary school demand.
108. A financial contribution of £3,200,000 is required to be secured to enhance bus services for the revised development. Of this amount £2,555,000 is to enhance bus services for the proposed secondary school. The contribution should be secured by the s106 agreement.

### *Bus infrastructure*

109. In order to facilitate the proposed development along Lower Richmond Road and Mortlake High Street, the applicant is proposing alterations to some bus stop locations along this corridor. Whilst TfL agreed the principle of these changes in 2016, TfL would recommend that the applicant reconfirms the length and widths of each stop and stand to ensure they meet TfL's current standards and include tracking with a 12m single deck rigid bus to demonstrate that they are accessible. The applicant should also provide tracking for the Sheen Lane mini roundabout to demonstrate that buses can still circumnavigate this roundabout in order to turn from the westbound side of the high street onto the eastbound side to access the bus stands. The applicant should also confirm that these stops and stands meet the TfL design standards for Accessible Bus Stops. The detailed design of these changes will still need to be agreed with TfL and this should be secured by condition or the s106 agreement.
110. During pre-application discussions for the original scheme, TfL were asked to investigate diverting route 209 to the Stag Brewery site. Whilst this was not considered to be a viable option, TfL did request that an area of land which can accommodate bus standing space for three vehicles and driver facilities should be

safeguarded in the south west corner of the secondary school site to allow for future route extensions. It is noted that should TfL wish to utilise this land for the bus turning facility it would require a separate planning application.

111. There is an existing bus stand on Mortlake High Street which accommodates standing for 3 buses. TfL would welcome discussions with the applicant as to whether there is an opportunity to deliver a bus driver facility to support these stands.
112. The full cost to implement any changes to TfL's bus infrastructure must be met by the applicant.

### Rail

113. Mortlake Rail Station and the trains which serve it are operated by South Western Railway (SWR). It will be for Network Rail and SWT to comment on the potential impact of the development on Mortlake Rail Station, the train services which operate through it and the level crossing.

### Travel Plan

114. Framework Site-Wide, Residential and School Travel Plans have been provided. The detailed Travel Plans should be secured, enforced, monitored and reviewed as part of the s106.
115. As per the called-in scheme, TfL would recommend that in order to further encourage active travel and to ensure that the development achieves the strategic mode share targets (75% for walking, cycling and public transport) required for outer London, a monitor and manage approach is proposed during the phased buildout of the development. A Sustainable Travel Implementation Fund should be secured up to a capped value of £350,000. This will allow for the implementation of measures, to ensure mode share targets are met. This should be secured in the s106 agreement.

### Delivery and Servicing

116. A Framework Delivery and Servicing Management Plan (DSMP) has been submitted in support of the application and will form the basis of the detailed DSMP, which should be secured by condition.

### Construction Logistics

117. A Draft Construction Logistics Plan (CLP) has been submitted with the application and a detailed version should be secured by condition. Careful consideration of construction routes and access will be required as part of the detailed plan to minimise disruption including impacts on bus operations and journey times. Where possible construction traffic will avoid peak hours.

## **Climate change**

### Energy strategy

118. Application A is expected to achieve a 77% reduction in carbon dioxide emissions over and above Building Regulations compliant development on the residential

element, with a 60% reduction in carbon emissions expected on the non-residential element. Energy efficiency (Be Lean) savings of 10% on the residential and 11% on the non-residential element are expected. The remaining reductions in carbon dioxide emissions would be generated by renewable (Be Green) infrastructure comprising Air Source Heat Pumps and solar panels.

119. In terms of compliance against London Plan Policy SI2, the scheme falls short of achieving the zero carbon target. The overall level of carbon dioxide emissions reductions would meet the minimum on-site requirements set in the policy and in terms of on-site energy efficiency measures for the residential element. The energy efficiency savings on the non-residential element fall short of the 15% minimum target in the London Plan.
120. Turning to the school (Application B), the energy strategy would also incorporate Air Source Heat Pumps and energy efficiency measures. However, no solar panels are proposed which is disappointing, given that the roof layout indicates that there is additional space for solar PV. The energy efficiency savings would be 15%, with overall savings of 66%. This complies with the minimum on-site requirements but falls short of the zero carbon target.
121. The energy strategy should be secured by planning obligation or condition. Carbon offset payments should also be secured. Whilst there are currently no opportunities currently to connect to an area wide District Heat Network in this location, the scheme should be future proofed to enable connection should this become possible over time.
122. London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen'). This should be secured.

### Whole Life-cycle Carbon

123. A Whole Life-cycle Carbon Assessment has been undertaken in accordance with the London Plan. This reviews the embodied carbon emissions associated with the proposed development, taking into account the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated and compared to the GLA benchmarks. The report outlines a range of opportunities which could be undertaken to reduce the carbon associated with the development at the more detailed design stage when materials are being selected and specified. This further review should be secured through a pre-commencement condition. A post-construction monitoring report should be secured by condition for each phase.

### Circular Economy

124. A Circular Economy Statement has been submitted which outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting re-usability, adaptability, flexibility and longevity. This is supported and complies with London Plan Policy SI7. Post-construction reports are proposed by the applicant which would provide further

details for each phase. This is acceptable and should be secured via a planning condition.

## Environmental issues

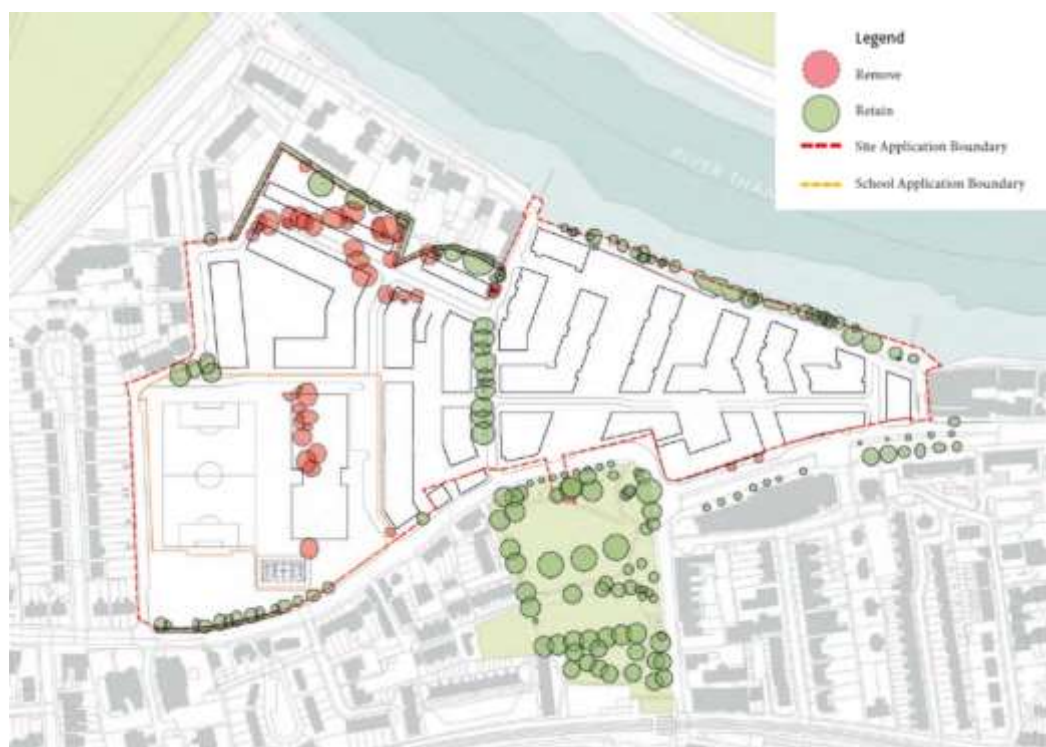
### Urban greening, trees and biodiversity

125. Policy G5 of the London Plan requires new development to contribute towards urban greening. Policy G7 requires development proposals to ensure that, wherever possible, existing trees of value are retained and that the loss of trees as a result of development is mitigated through the provision of replacement trees of an adequate value. Policy G6 states that development proposals should manage the impact on biodiversity and aim to secure net biodiversity gain.
126. A range of urban greening methods are proposed as part of the applicant's landscape strategy. This includes amenity grassland, flower rich perennial, hedge tree and meadow planting areas, rain gardens and green roofs. The applicant has undertaken an Urban Greening Factor (UGF) assessment which demonstrates that the scheme would achieve an overall UGF score of 0.28 across the entire site. Application A would ensure 0.3 UGF score
127. The UGF score for the school (Application B) is 0.22. This falls considerably short of the 0.4 target in the London Plan. This is brought down by the 3-G sports pitch and MUGA which are counted as permeable surfaces for the purpose of the UGF assessment. The assessment is also not able to take into account the design detail of the school's green roof, as this has not yet been designed in the required level of detail. The applicant has also stated that the overall score is affected by hard-landscaped public squares within the proposed masterplan, at Maltings Plaza and Bottlings Square, which are considered essential to enable events and markets. This was considered acceptable in the GLA's Stage 3 report and the details of the application have not changed in this respect, so the overall conclusion of GLA officers is the same on this application.
128. In terms of trees, the proposed scheme would result in the loss of 50 trees, including 2 Category A trees and 24 Category B trees as outlined below. To mitigate this, the scheme proposes 402 new trees. The majority of the trees to be removed are within the heart of the site to the rear of residential homes along the Thames Bank to enable the construction of Blocks 18, 20 and 21 and adjacent to the existing Watney's Sports Ground where the new school would be located. The existing trees including the mature London Plane trees along Ship Lane would be retained, as would the mature trees along the Thames Path.

Table 5 – Impact on existing trees

Category (High to Low)	Existing	To be removed	To be retained
A (highest quality)	22	2	20
B	56	24	32
C	58	18	40
U (lowest quality)	16	6	10
<b>Total</b>	<b>152</b>	<b>50</b>	<b>102</b>

Figure 8 – Impact on trees



#### Sustainable drainage and flood risk

129. The site is located within Flood Zones 2 and 3 and is protected by the River Thames flood defences. The development would involve replacing and upgrading the flood defence wall which forms the north east boundary of the site with a new wall to 6.7 metres AOD. Flood risk would be managed and mitigated through raised levels, improved flood defence walls and evacuation routes. The surface water drainage strategy for the site comprises a variety of Sustainable Urban Drainage (SUDS) methods such as attenuation tanks, permeable paving, rain gardens, green/brown roofs and areas of permeable soft landscaping within the site. The approach to flood risk management and drainage mirrors the previous planning application which was considered acceptable by the Environment Agency, Richmond Council and GLA officers.

#### Air quality

130. London Plan Policy S11 states that development proposals should not lead to further deterioration of existing poor air quality and should not create unacceptable risk of high levels of exposure to poor air quality. New development is expected to be at least air quality neutral, with EIA development required to provide an air quality positive statement outlining how local air quality can be improved. Development proposals within Air Quality Focus Areas such as this should demonstrate that design measures have been used to minimise exposure.

131. The entirety of the borough is covered by an Air Quality Management Area. In addition, Chalkers Corner / Clifford Avenue / A205 / Lower Richmond Road is one of 187 identified Air Quality Focus Areas in London that exceed the objective limits for NO<sub>2</sub> and have high levels of human exposure. The applicant's Air Quality Monitoring Report confirms that the UK objective levels for NO<sub>2</sub> are exceeded at

Chalkers Corner, Clifford Avenue and along Lower Richmond Road but reduce within the site.

132. The applicant's Air Quality Positive Statement outlines a range of measures in which impacts on local air quality would be minimised, including measures to mitigate and manage dust and emissions during demolition and construction; through the low carbon energy strategy which incorporates Air Source Heat Pumps, electric vehicle charging infrastructure and measures to limit and discourage car use, alongside highways works to Chalkers Corner to alleviate traffic congestion.
133. The applicant's Environmental Statement states that air quality modelling undertaken shows that the development would not give rise to a significant air quality effect that would adversely affect the occupants of existing buildings surrounding the site or future residential and school users within the development. However, from the assessments undertaken it is unclear whether or not the application as a whole would achieve air quality neutral standard in terms of building emissions and transport emissions and what mitigation measures are required. Mitigation measures in respect of air quality should be clarified.

### **Local planning authority's position**

134. Richmond Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

### **Legal considerations**

135. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

### **Financial considerations**

136. There are no financial considerations at this stage.

### **Conclusion**

137. London Plan policies on industrial land, town centres, housing, social infrastructure, education facilities, playing fields, open space, housing and affordable housing, urban design, heritage, inclusive design, fire safety, transport,



climate change, flood risk, drainage, urban greening, biodiversity and trees are relevant to these two applications. The applications do not comply with the London Plan as summarised below:

- **Land use principles:** The comprehensive mixed use redevelopment of the site including the proposed land uses is in line with the land use objectives set out in the Local Plan Site Allocation and Planning Brief SPD.
- **Housing and affordable housing:** 15% affordable housing (by unit) with a 20:80 tenure mix weighted towards intermediate shared ownership is wholly unacceptable. The overall level of affordable housing should be increased and the tenure mix revised and weighted in favour of social rent. Housing affordability levels should be secured alongside early, mid and late stage viability review mechanisms. A number of the assumptions and conclusions in the applicant's Financial Viability Assessment are not accepted including profit requirements, residential sales values and the substantial deficit. The quantum of affordable housing in the outline element of the scheme and in particular within Building 18 should be further optimised within the proposed building footprint and massing.
- **Urban design and heritage:** Whilst the massing has been revised the application conflicts with London Plan policies on heritage and the heights exceed the Council's Planning Brief SPD. Harm to heritage assets must be clearly and convincingly outweighed by public benefits associated with the proposal.
- **Transport:** Financial contributions towards bus capacity, the A205 Upper Richmond Road/Sheen lane junction improvement scheme, and the delivery of a crossing and shared footway / cycleway improvements on the A316 Clifford Avenue are required. The highway assessment should be revisited to take into consideration new surveys and forecasts in order to bring the assessment up to current standards. A sustainable Travel Fund should be secured to encourage active travel.
- **Climate change:** Further discussion is required relating to energy efficiency measures in the non-residential element and additional clarifications on the applicant's air quality assessment.

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