



Stag Brewery, Mortlake - Permanent Filming Use Application

Air Quality Neutral Assessment

February 2023

Waterman Infrastructure & Environment Ltd

Pickfords Wharf, Clink Street, London SE1 9DG
www.watermangroup.com

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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
Final	February 2023	Ellen Smith Principal Consultant	Ellen Smith Principal Consultant	Andy Fowler Associate Director



Comments

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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 use of land at the former Stag Brewery (the 'Site') 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 planning permission for the 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 erection of external film sets outside of the Maltings building (Building 9). The application would be limited in duration by a legal agreement, so that it would not preclude the hybrid 2022 planning application being considered at the Site (Application A, planning ref: 22/0900/OUT) and the Detailed Application School (Application B, planning ref: 22/0902/FUL) coming forward as and when these are granted planning permission. The 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 Guidance, February 2023. 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.

London Plan Guidance, Air Quality Neutral, February 2023

The Air Quality Neutral Guidance, February 2023³, hereafter referred to as the 'Air Quality Neutral Guidance' provides an update to the Air Quality Neutral Planning Support guidance from April 2014. The Air Quality Neutral Guidance 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 Air Quality Neutral Guidance 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,

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 Mayor Of London. 2023. London Plan Guidance, Air Quality Neutral, February 2023.

appropriate mitigation or offsetting will be required provides a methodology required to apply the air quality neutral policy.

The 'Excluded development' section of the Air Quality Neutral Guidance 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 Plan⁴ 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 Plan⁵ 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).

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.

⁴ LBRuT. 2018. Adopted Local Plan, July 2018.

⁵ LBRuT. 2022. Richmond Local Plan 'The best for our borough' Draft for consultation, January 2022.

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 Guidance 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 use of the existing buildings and land for a period of five years, for film production operations and ancillary activities.

The Air Quality Neutral Guidance 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. Deliveries and servicing, taxis or heavy vehicle movements from non-occupiers, have therefore not 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	Movements Per Day	Movements Per Annum
Office / Light Industrial	12,000*	16	192,000	120	43,800

Note: *Yard areas were excluded for a conservative assessment

As shown in **Table 1**, the 43,800 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 Air Quality Neutral Guidance and the adopted 2021 London Plan, the Development would be Air Quality Neutral.

Our vision

“Engineering a better environment for people and the planet”

Our mission

“To solve complex problems for the benefit of clients, communities and the climate”

Our values

People orientated

Individually and collectively, people are our business. We strive to create environments for everyone to flourish and thrive.

Flexible

Pragmatic by nature and dedicated to getting the job done to the highest possible standard.

Professional

Operating at pace with integrity to deliver technical and robust solutions.

Environmentally aware

We understand our responsibility to the environment, it shapes our decision making and informs our practice.

Innovative

Our forensic questioning provides the ability to deliver appropriate innovations at every stage on every project.

Relationship focused

We value individuality and the benefits of working collaboratively to achieve positive outcomes for all.

