

31st October 2023

Our Ref: 38262/5504/LoC02/231031

Lucy Thatcher
Development Control
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Dear Lucy

STAG BREWERY, LOWER RICHMOND ROAD, MORTLAKE, LONDON SW14 7ET: RAIL IMPACTS ASSESSMENT - TRANSPORT ASSESSMENT (MARCH 2022) AND TA ADDENDUM (APRIL 2023)

On behalf of our client, Reselton Properties Limited, this letter has been written to consider the affect arising from a series of amendments which are now being made in respect of the pending planning application ref: 22/0900/OUT ('Application A') at the Former Stag Brewery, Lower Richmond Road, Mortlake, London ('the Site'). For the avoidance of doubt, no physical changes are proposed to a linked application ref: 22/0902/FUL ('Application B').

Background

Two applications for planning permission were submitted to the London Borough of Richmond upon Thames ('LBRuT') on 11 March 2022 for the masterplan redevelopment of the Site and are currently pending determination. Consultation with statutory and public consultees has been ongoing throughout this period.

On 19 July 2023 both applications were heard at LBRuT's Planning Committee. The LBRuT's Planning Committee resolved to approve both applications, subject to the provisions set out in the Officer's Report.

On 24 July 2023 the Secretary of State made a statement confirming the Government's intention to mandate second staircases in new residential buildings above 18 metres. This followed consultation on this matter where expert bodies advocated support for this threshold.

Matters for Substitution

Although no formal transition arrangements or legislation has been announced at this stage, the Applicant has taken the decision to make amendments to the scheme which will allow it to adhere to the forthcoming changes announced on the 24 July 2023 by the Secretary of State in relation to the Government's intention to mandate second staircases in new residential buildings above 18 metres. This is referred to as the Fire-Led Amended Scheme.

The Transport Assessment [Stantec, March 2022] prepared for the Originally Submitted Hybrid Application (March 2022) ('Planning Scheme') undertook a Review of Station Capacity based on the Mortlake Station Capacity Analysis [Stantec, December 2017, Technical Note 19]. The TA concluded:

The rail assessments carried out indicate that there is sufficient capacity for both the existing and forecasted future passenger numbers in terms of station infrastructure and train capacity.

The trip generation was used to calculate the number of new trips anticipated to be made by train and using these numbers combined with existing flows, platform widths, staircase capacity, footbridge capacity and station entrances were all assessed and indicated they were sufficient for future needs.

For the Resolved to Approve by Planning Committee Hybrid Application (July 2023) ('Committee Scheme') the Transport Assessment Addendum [Stantec, April 2023, Technical Note 53] indicated rail trips would reduce slightly so the Review of Station Capacity in the TA remained a worst case.

The Mortlake Station Capacity Assessment was based on an audit of the station's physical features including station entrances (number and width), platforms (length and widths), footbridge walkway (widths) and stairways (widths). This was combined with station patronage data (sourced from Network Rail and commissioned surveys) and a multimodal trip generation analysis to estimate the additional train trips generated by the development. A secondary consideration was the frequency of fast services to/from London Waterloo station (via Putney) although no train capacity assessment was undertaken.

To confirm any impacts of the Fire-Led Amended Scheme on the Review of Station Capacity the following update is provided:

- **Physical features of station:** No change
- **Station patronage:** Data from the Office of Rail and Road indicates that in 2021-22 Mortlake Station passenger numbers (1.02M) were 45% lower than 2019-20 pre-Pandemic levels (1.87M)
- **Trip generation:** The number of Train trips generated by the Development between the Planning Scheme (March 2022), Committee Scheme (July 2023) and the Fire-Led Amended Scheme (October 2023) is shown below.

	Planning Scheme (March 2022) Up to 1071 Units	Committee Scheme (July 2023) Up to 1068 Units	Fire-Led Amended Scheme (Oct 2023) Up to 1075 Units	Difference (Committee to Fire- Led Schemes)
AM Peak (0800 – 0900 hrs)				
Arrivals	154	153	133	-20
Departures	101	93	93	0
Total	225	246	226	-20
PM Peak (1700 -1800 hrs)				
Arrivals	145	141	140	-1
Departures	190	188	166	-22
Total	335	329	306	-23

A comparison between the Committee Scheme (July 2023) and the Fire-Led Amended Scheme (October 2023) indicates the Development would generate 20 fewer train trips in the AM Peak and 23 fewer in the PM Peak.

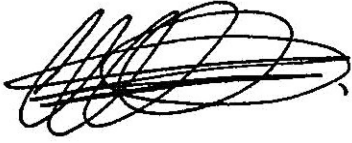
- **Train service frequency:** No change at 4 trains per hour.

The above demonstrates the Review of Station Capacity completed as part of the TA [Stantec, March 2022] for the Original Planning Scheme (March 2022) and by substitution the TA Addendum [Stantec, April 2023] produced for the Committee Scheme (July 2023), remains a worst case assessment when compared with the Fire-Led Amended Scheme (October 2023).

Conclusion

Having reviewed the changes summarised above and included in the substituted plans and documents, our view is that the amendments do not materially affect the conclusions of our original reports dated March 2022 and April 2023. Therefore, the conclusions remain valid in the light of the proposed amendments.

Yours sincerely

A handwritten signature in black ink, appearing to be 'GREG CALLAGHAN', written over a horizontal line.

GREG CALLAGHAN
DIRECTOR

STANTEC UK LIMITED