

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: Biodiversity Net Gain Assessment, Document Reference WIE18671-100-TN-20-4-1-BNG App A, dated March 2023

On behalf of our client, Reselton Properties Limited, this letter has been written to consider the effect 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 (SoS) in relation to the Government's intention to mandate second staircases in new residential buildings above 18 metres.

In summary the proposed changes to the scheme relate to **Application A only** and comprise:

- Building 1 (Cinema): Three levels of office changed to residential use (creating 17 new residential units) and decrease in building height by 2.6m. The cinema floor plans remain relatively similar with changes made to accommodate the residential core, refuse and cycle stores, risers and extending the cinema café. The third floor has changed from glazed to bronze cladding to suit the change of use, a cycle store has been added to ground floor and recessed balconies added to accommodate the introduced residential use in this building;

- Building 2: Internal layout changes only (including removal of top floor of duplex) – increase in 1 residential unit;
- Building 4: (The Maltings): Removal of residential floorspace on floor levels 6 and 7 and internal re-configuration to include only one core with two stairs and two lifts – overall decrease in 1 residential unit. Minor elevation changes to the Maltings to re-position the double height windows and change in the layout of the ground floor flexible use areas;
- Building 7: Internal layout changes only (including removal of top floor of duplex) – no change in residential unit numbers;
- Building 8: Re-arrangement of internal layout to accommodate core changes (no change in residential unit mix). Mansard roof stepped out around the southern staircase to accommodate dual staircases to the 8th floor;
- Building 10: Floor to ceiling heights changed very slightly to bring building under 18m;
- Building 11: Internal layout changes only (third lift and second stair added affecting number of habitable rooms) – no change in residential unit numbers;
- Building 12: Internal layout changes only (third lift and second stair added affecting number of habitable rooms) – no change in residential unit numbers;
- Buildings 15 and 17: These buildings are in Development Area 2 and are only in outline. Changes will be internal only;
- Overall increase in residential floorspace by +1,722 sqm GIA and increase in 7 private residential units (increase in 17 residential units in Development Area 1 and decrease in 10 residential units in Development Area 2). No change in affordable residential unit numbers;
- Decrease in office floorspace by -2,571 sqm GIA, increase in cinema floorspace (+149 sqm GIA), and increase in flexible use (+125 sqm GIA);
- Internal re-configuration of the basements to accommodate second stairwells, changes to waste stores, partitions and enlarged sprinkler tanks to satisfy updated electric vehicle fire regulations resulting in a reduction of 15 car parking spaces across the Development;
- Fire strategy amended, resulting in two stairs to all residential buildings over 18m in height and re-introducing connections to the basement car park for the two stair buildings. The basement car park fire strategy has also been updated to provide fire safety enhancements to account for the introduction of EV charging in the basement car park;
- Waste strategy amended, to return the refuse and recycling stores for Buildings 2, 7, 8, 11 and 12 to the basement level. For these buildings, holding stores at ground level have been provided in Buildings 3, 8 and 12 to support the collection process. Buildings 1, 3, 4, 5, 6, 9, 10 and all buildings in Development Area 2 maintain refuse and recycling stores at ground level; and
- Landscaping updates associated with changes to ground floor entrances for Blocks 8, 11 and 12, with amendments to the length of private gardens, additional planting and steps moved. Re-provision of green roof area to Building 1.

It is assessed that as the amendments to the landscape strategy would result in an overall gain of 112 sqm of green roof (comprising intensive and extensive green roof), 10 sqm of modified grassland and 9 sqm of vegetated garden as presented in the Urban Greening Factor (UGF) calculator¹. This additional habitat creation of 131 sqm has been inputted into the biodiversity net gain Metric 3.0 (as

¹ Gillespies (November 2023); Urban Green Factor Calculator – Application A; Report ref: P10736-00-004-GIL-0504 UGF Application A – Revised.

was used for the original BNG Design Stage Assessment for Application A²). It has resulted in an increased major net gain total of +9.47 habitat units (+204.21%). The hedgerow units however remain the same (+3.03 units or +58.53%) as no additional hedgerow planting is proposed. This major net gain is a slight increase to that detailed in the original BNG Design Stage Assessment for Application A and the application still provides over the minimum of +10% BNG as defined in the Environmental Act 2021 (and planning policy).

Conclusion

Having reviewed the changes summarised above, our clear view is that the amendments do not materially affect the conclusions of our Biodiversity Net Gain Assessment Report dated March 2023.

Yours sincerely



Lee Mantle
Principal Ecologist
Waterman Infrastructure & Environment Limited

² Waterman (March 2023). Stag Brewery Application A. Biodiversity Net Gain Design Stage Assessment. Ref WIE18671-114-TN-20-4-1-BNG App A.