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

01 November 2023

Dear Lucy,

Re: Stag Brewery – Scheme Amendments and the impact on Internal Daylight and Sunlight

On behalf of our client, Reselton Properties Limited, this letter/document 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.

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.

Internal Daylight and Sunlight results

Full detailed results of the internal daylight and sunlight assessment can be found appended to this report. A summary of the overall compliance rates has been provided below.

Building	July 2022 Daylight Illuminance compliance	October 2023 Daylight Illuminance
Block B1	N/A	72%
Block B2	66%	68%
Block B3	60%	64%
Block B4	45%	60%
Block B6	96%	97%
Block B7	64%	66%
Block B8	66%	70%
Block B9	100%	100%
Block B10	91%	92%
Block B11	63%	72%
Block B12	76%	82%
Total	68%	73%
School	64%	63%

The results of the daylight assessments show that there are minor shifts in overall compliance across the whole site as a result of the proposed changes. Notwithstanding this, the changes have typically resulted in an improvement to internal daylight levels, with 73% of the residential rooms assessed meet the daylight illuminance target. This presents an improvement from the previous assessment undertaken in July 2022, which presented an overall compliance rate of 68%.

Therefore, it is considered that the proposed changes are not considered to have a material effect on the daylight levels within the proposed residential units and will only improve the internal amenity of these units.

For internal sunlight, 376 (66%) of the 567 living rooms and living / kitchen / dining rooms achieve the recommended 1.5 hours of sunlight on March 21st. This presents a minor decrease from the 67% compliance presented in the July 2022 assessment. This change is likely due to the reduction of residential units at the upper levels; rather than a reduction of sunlight levels in the units themselves. Again, this is not considered to be a material reduction in sunlight levels.

Conclusion

Having reviewed the changes summarised above and included in the substituted plans and documents, our clear view is that the amendments do not materially affect the conclusions of our original Internal Daylight and Sunlight Report dated July 2022.

I trust the above provides the information you need at this time, but please do not hesitate to contact me should you need anything further in this regard.

Yours sincerely,

John Barnes

Director

For and on behalf of eb7 Ltd