

Former Stag Brewery, Lower Richmond Road, Mortlake Retail and Leisure Statement: Second Addendum October 2023 Planning Application Ref: 22/0900/OUT

Introduction

1. This Second Addendum should be read in conjunction with the RPS Retail and Leisure Statement ('the Statement'), dated March 2022 and Retail and Leisure Statement Addendum July 2022 ('the Addendum') submitted in support of planning application reference 22/0900/OUT.
2. The application proposals comprise the redevelopment of the Former Stag Brewery, Lower Richmond Road, Mortlake, London ('the Site') by Reselton Properties Limited ('the Applicant').
3. This Second Addendum considers the affect arising from a series of amendments which are now being made in respect of pending planning application reference 22/0900/OUT ('Application A'). For the avoidance of doubt, no physical changes are proposed to a separate linked application reference 22/0902/FUL ('Application B').

Background

4. The 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.
5. 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.
6. 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

7. Although no formal transition arrangements or legislation has been announced at this stage, a Ministerial Statement of the 24 October 2023 provides an indication of the transition period for compliance once legislation has come into effect.
8. 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.
9. In summary, the proposed changes to the scheme relate to Application A only and the need to accommodate second staircases necessitates some reorganisation of the 'flexible use floorspace' and the arrangement of residential apartments.
10. In terms of retail and leisure planning policy matters, there will be a small reduction in the resultant residential population of the scheme and a small increase in the amount of 'flexible use floorspace'.
11. The purpose of this Addendum is to provide an update regarding the potential effects of these changes in so far as they are relevant to retail and leisure policy considerations. Consistent with the previous Addendum, this Second Addendum presents and compares the expenditure generated by the future residential population of the scheme together with the turnover potential of the proposed retail, food and beverage floorspace component of the flexible use floorspace according to consistent parameters.

12. Importantly, the Applicant proposes the same limitations to control the nature and composition of the proposed 'flexible use floorspace' consistent with previous assessments.

Retail and Leisure Policy Implications

13. This Second Addendum considers the implications arising from a small increase in the amount of proposed 'flexible use floorspace' (4,909sqm GIA in total) combined with the increase of 7 residential units in terms of assessing the proposals continued compliance with retail and leisure planning policy, including matters relating to scale, sequential and impact tests.
14. The table below provides a summary of the scheme evolution in terms of the amount of flexible floorspace and the number of residential units/resultant population.

Scheme Component	Timeline		
	As submitted March 2022*	Addendum July 2022**	Proposed October 2023***
Flexible Floorspace	4,839sqm	4,784sqm	4,909sqm
Residential Apartments	1,085	1,068	1,075
Residential Population	2,472	2,448	2,303

*Original planning application submission Retail & Leisure Statement March 2022

**Retail & Leisure Statement Addendum July 2022

***Latest scheme amendments addressing second staircase requirement

15. The small change in proposed flexible use floorspace and residential unit numbers are the result of design changes to accommodate the requirement for second staircases serving the residential apartments.
16. As can be seen, the increase in flexible use floorspace now proposed is just +70sqm compared to the scheme as originally submitted and +125sqm when assessed against the revised July 2022 proposals.
17. Consistent with the comments made within the Planning Officer's report to Planning Committee (19th July 2023 - paragraphs 8.40 – 8.62), the nature and quantum of the flexible use floorspace remains broadly the same and continues to be controlled in a manner consistent with previous assessments.
18. Section 7 of the Statement concerns the sequential test. The application site is allocated in the Local Plan for mixed use development, including retail and leisure uses. The policy allocation requires development proposals to be of an appropriate scale and nature.
19. 'Appropriateness' is determined by reference to significant adverse effects (impact).
20. Section 8 of the Statement undertakes an 'impact assessment' of the proposed flexible use floorspace (retail, food and beverage uses).
21. Section 8 provides details of available expenditure on retail (convenience and comparison goods) and food and beverage (spending in cafes, restaurants etc) within the local catchment area, estimates of spending generated by the proposed residential population of the scheme and the turnover potential of the proposed retail, food and beverage floorspace.
22. Consistent with the Addendum, the tables below replicate those set out in Section 8 of the Statement and provide revised estimates reflecting the small changes in proposed floorspace and the number of residential units (as now proposed). The comparable figures adopted by the Statement and Addendum are provided for ease of reference.
23. In terms of the spending potential of the future residents of the scheme, there will be a reduction in the residential population of the scheme from 2,448 (as assessed by the July 2022 Addendum) to 2,303.

Expenditure Type	Total Future Resident Population Expenditure £M 2009		
	As Submitted March 2022)*	Addendum July 2022*	Revised October 2023**
Comparison	12.78	12.65	11.50
Convenience	6.76	6.70	7.75
Food & Beverage	6.77	6.71	6.90
Total	26.31	26.06	26.15

* Richmond Upon Thames Retail and Leisure Needs Study Phase 1 (July 2021), 2019 prices, sales densities modelled as £8,50 per sqm for convenience goods, £6,500 per sqm for comparison goods and £6,200 per sqm for Food & Beverage; and ** Richmond Upon Thames Retail and Leisure Study Phase 2 (January 2023), 2020 prices – sales density adjusted (£8,679 per sqm for convenience goods, £5,965 for comparison goods and £6,020 per sqm for Food & Beverage)

24. As the above table shows, the revised scheme will generate £26.15M from the spending power of its future residents in 2029. This remains very comparable to figures presented within the Statement and Addendum. The revised October 2023 assessment utilises the latest estimates of expenditure derived from the Richmond Upon Thames Retail and Leisure Study Phase 2 (January 2023).
25. Similarly, in relation to the turnover potential of the proposed retail, food and beverage floorspace, by adopting similar assumptions as set out in the Statement (paragraphs 8.42 – 8.46) the table below demonstrates the potential turnover capacity of the revised scheme will be £14.38M in 2029.

Expenditure Type	Total Potential Turnover Capacity £M 2029		
	As Submitted March 2022*	Addendum July 2022*	Revised October 2023**
Comparison	4.29	4.29	3.94
Convenience	7.29	7.29	7.45
Food & Beverage	2.77	2.53	2.99
Total	14.35	14.11	14.38

* Richmond Upon Thames Retail and Leisure Needs Study Phase 1 (July 2021), 2019 prices, and ** Richmond Upon Thames Retail and Leisure Study Phase 2 (January 2023), 2020 prices

26. The scale and nature of the proposed flexible use floorspace, albeit with a slight increase in floorspace, remains very comparable to that assessed in the Statement, Addendum and indeed the previous scheme of development for the site (ref: 18/0547/FUL). LBRuT and the Mayor raised no cause for concern in terms of the impact and sequential tests in respect of those previous proposals.
27. The amount of expenditure generated by the residential population of the scheme would consistently remain at around £26M in 2029. In comparison, the potential turnover of the flexible use floorspace would consistently remain at around £14M.
28. In summary, there is significant expenditure generated by the population of the proposed scheme to completely offset the potential turnover of the scheme, with surplus expenditure available to benefit local town centres.

Conclusions

29. The limited changes to flexible use floorspace now proposed together with the increase in the number of residential units are negligible and would not cause any significant adverse effects upon any town centre. Furthermore, there would be no issue in terms of the sequential test given the appropriateness of the scale of the proposed flexible use floorspace which remains consistent with that previously assessed.
30. 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 Retail and Leisure Statement dated March 2022 in respect of the sequential test (Section 7) or impact (Section 8).
31. In conclusion, the updated assessment set out above directly supports the conclusions reached by the Planning Officer in the report to Planning Committee of the 19 July 2023 and those made by RPS in July

2022 and March 2022, namely that there should be no concerns regarding matters of retail impact, scale or sequential sites.