

## 4. Alternatives

### Introduction

- 4.1 The 2017 EIA Regulations require the Environmental Statement (ES) to include a description of the main alternatives reasonably studied by the Applicant. An indication of the main reasons for the choices made to achieve the final design (i.e., the Development) should also be provided, taking into account the likely significant environmental effects. Accordingly, this Chapter, prepared by Waterman Infrastructure & Environment Limited (Waterman) in conjunction with the Applicant's architects (Squire and Partners) and transport consultants (Stantec) sets out such information.
- 4.2 Having regard to policy objectives for the redevelopment of the Site, the adopted planning brief and the site-specific policy development allocation, the Applicant has not considered any alternative locations for the Development. This Chapter therefore focuses upon alternative design options considered within the Site.
- 4.3 The final design of the Development is described in **Chapter 5: The Proposed Development**.

### Key Principles of the Development

- 4.4 As noted in **Chapter 1: Introduction**, the Site is identified in the adopted London Borough of Richmond upon Thames (LBRuT) Local Plan<sup>1</sup> (July 2018 and March 2020) as an area for comprehensive redevelopment to provide a new village centre for Mortlake (Site Allocation ref: SA 24).
- 4.5 To further define the key design principles of comprehensive redevelopment, LBRuT have prepared Supplementary Planning Documents (SPD) specific to Stag Brewery and Mortlake, namely the Stag Brewery Planning Brief<sup>2</sup>, which details the key design principles for the redevelopment of the Site, and Mortlake Village Planning Guidance<sup>3</sup>.
- 4.6 The Planning Brief was adopted in 2011 following consultation with the public and statutory stakeholders. Its vision is for the Site is to provide a new village heart for Mortlake based upon buildings and open public realm, whilst respecting the character and history of the area. To achieve the vision, the Planning Brief sets out indicative design principles for redevelopment which are based upon the constraints and opportunities of the Site. In summary, the key uses, layout, and design principles for the Site, as set out in the Planning Brief include:
  - a mixed-use approach across the Site, including support of a residential led mixed used development;
  - provision of new employment opportunities, including office and retail uses;
  - the inclusion of small-scale sports and leisure uses;
  - provision of education and community uses;
  - inclusion of new green space, including a link between Mortlake Green and the River Thames, a waterside open space close to the Maltings and an amenity area along the riverside;
  - integration of the existing Buildings of Townscape Merit within proposed development;

- development to protect and interpret the remains of Mortlake's industrial heritage and riverside infrastructure, as well as the setting and character of heritage assets and Conservation Areas;
- provision of car parking in line with LBRuT requirements;
- consideration of existing traffic issues including congestion and minimising adverse effects on the surrounding area and the amenity of nearby residents;
- improve linkages, including pedestrian and cycle routes, to the River Thames from and through the Site and linking to existing routes in the area; and
- Plan 1 of Appendix 1 of the Planning Brief is an indicative vision plan showing how land uses, open space and transport linkages could be organised within the Site. Plan 1 also identifies indicative heights, ranging from 3 to 7 storeys to the west of Ship Lane, and up to 7 storeys to the east of Ship Lane.

## Alternatives to the Development

- 4.7 Under the 2017 EIA Regulations, an ES is required to include "*a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment*".
- 4.8 Schedule 4 of the 2017 EIA Regulations identifies the following types of alternatives:
- Alternative locations;
  - Alternative designs;
  - Alternative sizes and scales; and
  - Alternative technologies.
- 4.9 The following sections consider alternative sites, uses, sizes & scales, technologies. A discussion on design evolution is provided in the following section.
- 4.10 The 2017 EIA Regulations also require the ES to provide "*an outline of the likely evolution [of the baseline] without implementation of the development*" (also known as the 'No Development' scenario). Given the policy objectives of LBRuT for comprehensive redevelopment of the Site, a 'No Development' scenario is not considered a reasonable alternative by the Applicant. However, this scenario and the evolution of the baseline conditions in the absence of the Development is discussed below prior to the discussion of the main alternatives considered by the Applicant.

### The 'Do Nothing' Scenario

- 4.11 Having concluded that the Site should be redeveloped, the 'No Development' scenario was not an alternative that was considered by the Applicant, albeit the implications of no development remain relevant to an assessment of the baseline environmental effects against which this assessment takes place.
- 4.12 As indicated within the Planning Brief, the Site is not a viable option for continued large scale brewing activities due to the space constraints on-Site which limit the scope for the ability for the operations to continue at an economic scale. As such, brewing operations ceased in 2015 and decommissioning of brewery infrastructure was undertaken following cessation of brewery

activities, which was completed in October 2017. If the Site was left in its current state, there would be a missed opportunity for a new village heart for Mortlake and the specific objectives of the Planning Brief would not be realised. Furthermore, as indicated within the National Planning Policy Framework<sup>4</sup>, there is a presumption in favour of sustainable development and encouragement of the effective use of land by reusing land that has been previously developed which would not be realised were the Site to be left in its current state.

- 4.13 On the basis that the Site is identified by planning policy as a key site for redevelopment, and brewing operations are no longer viable, the Applicant has not considered the option of not redeveloping the Site.

#### **Evolution of Baseline Conditions**

- 4.14 Whilst the Applicant has not considered a 'No Development' scenario any further, the 2017 EIA Regulations require the consideration of the likely evolution of the baseline conditions of the Site without implementation of the Development. The existing baseline conditions of the Site are reported in **Chapter 7** to **Chapter 19** of this ES and relate to conditions identified at the time the surveys and desk-based research were undertaken in 2018-2021. The baseline conditions are expected to evolve for a number of the environmental issues considered within this ES, as outlined in **Table 4.1**.

**Table 4.1: Likely Evolution of Baseline Conditions Without Implementation of the Development**

<b>Environmental Discipline</b>	<b>Evolution of Baseline</b>
Socio-economics	Without the proposed Development, the proposed rejuvenation of the area would not occur, and the Site would not contribute to LBRuT's housing (including affordable housing) and employment targets.
Transport and Access	Without the Development, the permeability and connectivity of the local area for pedestrians and cyclists would not be improved and there would be no enhanced amenity for pedestrians and cyclists.  The highways works to facilitate the Development include improving the capacity at the Chalkers Corner junction. Without the Development, this junction would continue to be congested.  Hammersmith Bridge is temporarily closed for repair works, which has had a negative impact on the operation of Chalkers Corner at peak times, with Transport for London (TfL) stating that Chiswick Bridge is experiencing an increase in vehicular traffic due to the reduction in the number of crossing points for vehicles over the River Thames. Once Hammersmith Bridge re-opens, the future traffic conditions in the surrounding road network (in particular Chiswick Bridge) will improve.
Noise and Vibration	The existing activities within the Site and commercial and residential uses surrounding the Site are unlikely to change and therefore would not change existing operational noise levels.
Air Quality	Based on current guidance for air quality, it is expected that there would be a progressive reduction in vehicle emission rates, and resultantly background concentrations, due to newer vehicles with lower emissions replacing older vehicles along with tighter emission standards for polluting industries and combustion equipment. Furthermore, car use within London is generally reducing, resulting in further air quality improvements. Thus, it is expected that over time, air quality within London (and therefore the Site) would improve.

Environmental Discipline	Evolution of Baseline
Ground Conditions and Contamination	Given there would be no change in land use activities within the Site until the Development is built, existing ground contamination and underlying aquifers would remain undisturbed beneath the ground.
Surface Water Drainage and Flood Risk	<p>Existing surface water flows from the north-east of the Site discharge into the River Thames via an existing outfall, with the remainder of surface water and foul flows from the Site discharging into the Thames Water sewer network.</p> <p>If the Site were to remain as existing, surface water and foul water would continue to discharge in this manner. Comprehensive redevelopment of the Site provides the opportunity for betterment on surface water management including allowing for climate change.</p> <p>The Development will provide a new flood defence wall, which will improve protection from tidal flood risk to both the Site and surrounding area compared to the existing flood wall, which based on a flood defence wall condition survey undertaken in 2016 was found to be in a poor to fair condition. Without improvements to the defences along the river frontage, the Site and surrounding area will be at a greater risk from tidal flooding. Without land raising as part of the Development, surrounding low-lying residents would not be able to use the Site as a safe refuge in the unlikely event that the defences were breached.</p>
Ecology	<p>When considering the Site itself, it is anticipated that the baseline would not evolve in the absence of the proposed Development being undertaken. The Site would continue to offer the same opportunities for legally protected and notable species in an urban environment, as the buildings and associated habitats would be subject to the same management prescriptions.</p> <p>Furthermore, there would be a missed opportunity to enhance the Site for biodiversity which would also contribute to an enhancement for biodiversity within the local area.</p>
Archaeology	Given there would be no change in land use activities within the Site until the Development is built, below ground archaeology would remain undisturbed beneath the ground.
Built Heritage, Townscape and Visual	<p>Without any intervention or development on the Site in future years, the heritage assets (BTMs and non-designated) on-Site are at risk of further deterioration in their current disused state. The value of heritage receptors off-Site is unlikely to change given the level of protection that requires their preservation through statutory designation.</p> <p>The value of townscape and visual receptors is likely to reduce in the absence of redevelopment on the site as the public realm and visual amenity of the Site would likely degrade further without investment.</p>
Wind Microclimate	Given there would be no change in the built form within the Site until the Development is built, the existing wind conditions on and immediately off-Site would not change.
Daylight, Sunlight, Overshadowing and Light Pollution	<p>Given there would be no change in the built form within the Site until the Development is built, the existing levels of daylight, sunlight, overshadowing experienced by adjacent residential properties would not change.</p> <p>The amount of light pollution experienced by surrounding properties from Site activities (such as from floodlighting) would also not change until there is a change of use and the Development is built.</p>
Greenhouse Gases	The existing buildings would remain on-Site and unlikely to change technologies or activities that would result in changes to operational greenhouse gas emissions.

## Alternative Sites

- 4.15 Although other sites in the vicinity of the Site have also been identified as development sites, these are not in the Applicant's (who owns the Site) control, and so were never considered as alternative sites for the Development. Through consultation with local residents, LBRuT and other key stakeholders, it has been identified that the Site would be suitable for a residential-led mixed-use redevelopment.
- 4.16 The other main reasons for not considering alternative sites are the same as for the 'no development alternative' explained earlier in this Chapter, namely:
- Planning policy encouraging the development of the Site; and
  - The requirement for LBRUT and the Greater London Authority (GLA) to meet their housing targets.

## Alternative Designs and Uses

- 4.17 The Applicant has not considered fundamentally different alternative uses or mix of uses for the Site, which are beyond those identified in the Planning Brief. However, in response to consultation with LBRuT, GLA, TfL, Environment Agency (EA), Sports England and other statutory consultees and during the public consultation process, various alternative building heights and layouts have been considered during the master planning process and the key alternatives described below. Furthermore, and as described within the following sections, a degree of design evolution has occurred in response to environmental constraints and opportunities, and these changes are reflected in the final Development for which planning permission is sought.

## Consultation

- 4.18 Consultation in respect of environmental design and assessment was undertaken throughout the evolution of the design. This included regular pre-application meetings with officers within LBRuT as well as engagement with statutory consultees (such as those stated in the paragraph above). In respect of public consultation, the following dedicated engagement has been carried out:
- communications issued in December 2021 to draw attention to the proposal to submit an amended planning application for the former Stag Brewery site early in 2022 via an email circulated to all who signed up to the original consultation database (1,500+);
  - consultation website updated in December 2021 to describe forthcoming application and timelines;
  - interactive consultation website sections added in January 2022 for Applications A and B - each with their own separate on-line polls;
  - adverts placed in the Barnes, Mortlake and Sheen Times on multiple dates to draw attention to the interactive website, the focused webinar sessions and the planning application submission timeline;
  - two webinar sessions (as above) staged in January 2022 consisting of presentations by the architects and chaired Q&A sessions with participants. This was advertised as above and on the consultation website with invitations issued to everyone on the consultation database and former Community Liaison Group (CLG) members (1,500+);

- dedicated meeting with key representatives of the Mortlake Brewery Community Group (MBCG), a self-appointed group created in 2017 by members of the local community; and
  - Statement of Community Involvement (SCI) addendum published on the updated consultation website referencing the original 2018 SCI, which is directly accessible through the website.
- 4.19 Prior to the above engagement, and in connection with a scheme that is very close to the current Development proposals in terms of layout, design ethos and land uses, six meetings were held with a CLG as part of the 2018 Planning Applications to discuss the evolving proposals and rational for design decisions. The CLG was appointed for and chaired by the Applicant's public consultation consultants (Soundings) to represent a cross section of the community. Two major public exhibition events were held, the first in March 2017 and a second in July 2017. Subsequent to the Mayor's direction (refer to **Chapter 1** for further detail on the planning history), on 17 July 2020, the Applicant submitted revisions to the 2018 Planning Applications (the 'July 2020 Amendments') with the public consultation period running from 14 August 2020 to 27 September 2020. Given the impacts of COVID-19, the consultation website was updated to show a detailed fly-through of the July 2020 Amendments, and in addition the senior architect, Michael Squire, described the evolution of the scheme in detail which was captured on a video. Both of these resources were widely advertised to a consultation database of around 1,600 local groups and individuals.
- 4.20 Further statutory consultation was carried out by the GLA in three steps:
1. 14 August to 27 September 2020 on the main design amendments;
  2. 1 to 31 October 2020 on Design Code and other revisions; and
  3. 8 February to 8 March 2021 on transport impacts and mitigation.
- 4.21 This was all considered at a Public Hearing at City Hall on 27 July 2021 at which the Mayor directed the two planning applications to be refused.
- 4.22 Further details of the design process and consultation are provided in the Design and Access Statement and the SCI which are submitted as standalone documents accompanying the planning applications.

#### **Building Height, Massing and Footprint**

- 4.23 The masterplan presented at the public consultation event in March 2017 as part of the 2018 Planning Applications set out a proposed range of building heights (refer to **Figure 4.1**) within the Site. This included buildings of up to 5 storeys within the west, buildings of up to 6 storeys fronting the River Thames within the east, and a 14-storey marker building adjacent to the (former) Hotel.
- 4.24 Consultation with LBRuT, feedback from the CLG and public consultation attendees raised concerns with the overall density of the proposals, the width and location of the proposed green link between Mortlake Green and the River Thames, and the inclusion of the marker building. These three elements of the proposals were reconsidered, and the changes noted below taken forward as the design of the Development.
- 4.25 The masterplan presented at the July 2017 public consultation (refer to **Figure 4.2**) indicated the green link between Mortlake Green and the River Thames was increased from approximately 22 m to 26 m, to 30 m and then again, to 38 m. This widening of the green link was provided to

increase amenity, functionality, minimise overlooking issues associated with residential units located either side of the green link and to provide the pre-eminent route to the river and the heart of the scheme.

- 4.26 To create an uninterrupted pedestrian and cycle linkage from Mortlake Station (south of the Site) via Mortlake Green / Sheen Lane to the green link directly opposite the north-eastern corner of Mortlake Green, the positioning of the pedestrian and cycle crossing at this location would have required the removal of several mature trees from Mortlake Green to ensure adequate visibility to the River Thames and for drivers using the Lower Richmond Road. A crossing at this location, close to the Sheen Lane mini roundabout, would also have had a detrimental effect on the operation of that junction. As such, the location of the green link and the proposed pedestrian and cycle crossing were moved further west (refer to **Figure 4.2**) to achieve a safe pedestrian and cycle crossing, whilst retaining all the trees within Mortlake Green. The new location of the green link also provided an area for a new public square at the principal entrance to the scheme which would be visible from the Lower Richmond Road.
- 4.27 The masterplan presented at the July 2017 public consultation (refer to **Figure 4.2**) reduced the height of buildings within the west of the Site to 3 storeys. Owing to the widening of the green link, the reduction of the marker building from 14 storeys and the loss of a building fronting Lower Richmond Road, in order to retain commercial viability, it was necessary to increase the height of the buildings adjacent to the River Thames up to 7 and 8 storeys depending on the individual building. This also resulted in changes to the building footprints.
- 4.28 The July 2020 Amendments of the 2018 Planning Applications resulted in an increase in height for some buildings by up to 3 storeys, change to the layout of Buildings 18 and 19, and conversion of Building 20 from a terrace row of housing to two four storey buildings in response to the GLA's affordable housing targets and optimising housing density. Building height increases were primarily located in the centre of the Site to lessen the impact on existing townscape and views. The increase in height around the Maltings Building (Building 4) was more limited to lessen the impact on the prominence of this historic building.
- 4.29 Minor changes were made to the building footprints in Development Area 1 in response to aesthetic refinements. Changes to building footprints were made in Development Area 2 (outline element) in response to providing increased affordable housing provision and daylight and sunlight as follows:
  - an 18m gap was introduced in a south-west orientation to Building 18 (dividing the footprint of this building into two) to allow sunlight to penetrate the courtyard and reduce the impact of overshadowing;
  - the massing of Buildings 18 and 19 was set back to reduce impacts for existing residents along Williams Lane; and
  - the massing of Building 9 was set back to reduce impacts for existing residents along Boat Race House.
- 4.30 A comparison of the River Thames front elevations between the proposals in March 2017 and July 2017 are presented by **Figure 4.3** and **Figure 4.4** demonstrating the widened green link and loss of the 14-storey marker building. **Figure 4.5** shows the ground floor layout of the 2018 Planning Applications (as amended by May 2019 Amendments) and **Figure 4.6** shows the ground floor layout of the July 2020 Amendments.

- 4.31 The height and massing of the Development considered the relationship with the Buildings of Townscape Merit (BTM) within the Site, specifically to ensure they are not dominated by new buildings and that the Maltings, in particular, maintains its dominance in views from the river. The massing of new buildings diminishes to the east and west of the Site and generally rises to the centre of the Site from the river, whilst maintaining variety in height on the river. Further detail is provided in **Chapter 16: Townscape and Visual**.
- 4.32 Whilst not part of the EIA, daylight and sunlight within the proposed Development itself, and rights of light issues were considered throughout the design process. Careful consideration was undertaken regarding window design and position of balconies to ensure reasonable daylight levels for future residents. Following daylight and sunlight advice during the design process of the 2018 Planning Applications, residential units at ground floor level within the eastern part of Site were pushed forward by 1.5 m to form a continuous block rather than having recessed entrances. Further massing changes in response to daylight and sunlight were also made as part of the July 2020 Amendments (refer to the above regarding Blocks 18 and 19). Play space has also been distributed in landscaped areas that receive greater amounts of light.
- 4.33 Initial wind advice was given regarding the proposed 14 storey marker building which would have required canopies and screens to reduce wind speeds from downdraught. Other initial wind advice included the recommendation for soft landscaping such as trees along the High Street and between the health centre and extra building to decelerate local winds. The scheme was subsequently revised, and the 14-storey marker building removed, with further wind advice provided to the design team. Further detail on the type of soft landscaping and / or porous screening were recommended, such as planting evergreen trees or deciduous trees maintaining dense branches when bare. Following the wind tunnel test for the 2018 Planning Applications, it was recommended that solid glazed balustrades to a height of at least 1.5m are provided on certain balconies to achieve sitting conditions during the summer. Owing to updated fire regulations, the glazed balustrades on the mansion blocks have all reverted to metal railings, however the updated wind assessment (refer to **Chapter 17: Wind Microclimate**) concludes that wind conditions at these locations would still be suitable for sitting and standing use during the summer season. As set out in **Chapter 17: Wind Microclimate**, as a result of the July 2020 Amendments, 1.2m high hedges were proposed at the interface between the public footpath and residential private area in Building 16, as well as two additional trees (5-7m high) to the south of Buildings 7 and 8 as wind mitigation have been incorporated as part of the Development.
- 4.34 Following the reasons of refusal by the GLA on the July 2020 Amendments regarding height, massing, and townscape, visual and heritage setting impacts, the Development has been amended, with the latest design informed by LBRuT's Design Review (DRP) process. The first DRP meeting was held on 30 September 2021 to discuss the updated draft proposals. The second meeting was held on 2 February 2022 to present the final Development proposals. A summary of the DRP process is presented in **Table 4.2**.

Table 4.2: Summary of design response to DRP Comments

DRP Comments	Design response
Dominance of built form over the Maltings.	Reduced Buildings 2, 3, and 7 around the Maltings by one storey.
Additional height to redistribute massing to centre of Site.	Buildings 8, 10, 11 and part of Building 12 increased by 1 storey.

DRP Comments	Design response
Support for the reduction in height of Buildings 20, 21 and 22.	Return of Buildings 20-22 to terraced houses as per the 2018 Planning Applications.
Consider Healthy Living Agenda.	Community use agreement with the school for the use of the sports facilities.
'Play on the way' and water play principles.	Already integrated into the design.
Green roof strategy for Phase 2.	Agreed, added to Design Code.
Management and maintenance strategy.	Agreed, included as part of planning applications.
Sustainability	The design seeks to achieve improvements in energy targets, green roofs and Urban Green Factor. The Development Area 2 basement is greatly reduced from the 2018 Planning Applications (as per the 2020 Planning Applications submitted to the GLA).
Additional height to cinema block (Building 1).	Additional storey was added to the 2020 Planning Applications and remains unchanged.
Re-examine secondary school.	<p>Residential above the school has been explored however is not being pursued because:</p> <ul style="list-style-type: none"> <li>• playspace on the roof of the school would need to be re-provided;</li> <li>• co-ordination of additional structure, cores and services would require re-planning of the school;</li> <li>• complete re-design of the school would be required to accommodate residential buildings adjacent to the school and the proposed square layout may not be as efficient; and</li> <li>• any major changes to the school such as this would need to be agreed with the Department of Education (DfE).</li> </ul>
Pedestrian connection from the station.	<p>Pedestrian connections have already been improved within the design as a result of the 2020 Planning Applications.</p> <p>Previously agreed that the roundabout and level crossing cannot be moved for safety reasons.</p>
Typology of blocks.	The mansion block and warehouse typologies are considered by the design team to be sufficient for Development Area 1 (detailed part of Planning Application A). The Design Code for Development Area 2 (outline part of Planning Application A) allows for more flexibility.
Concern over mansion block typology, mass and richness.	The mansion block brickwork and glazing varies across Development Area 1. The design team considers the composition of balconies, bay windows, gables and chimneys sufficiently distinct, with massing to be retained.
Landscape design too formal.	The design team consider the landscape design to be appropriate and deliberately informal.
Splitting Building 2.	Re-allocated area difficult to distribute without impacting on the Maltings, therefore no changes were made.
Reduce number of single aspect dwellings.	Revisions made to the layout of buildings 2 and 10 to reduce single aspect dwellings. Review of buildings 18 and 19 to ensure future detailed design will minimise single aspect dwellings.
Building 6.	Building 6 height remains as per the 2018 Planning Applications.

4.35 The latest design comprises a scheme with a reduction in height of several of the residential buildings (Buildings 2, 3, and 7) by 1 storey to better respond to the listed buildings along the Thames riverfront and to respect the setting of the Maltings building. Buildings 8, 10, 11 and part of Building 12 within the centre of the Site which have increased by 1 storey to re-distribute this loss in building floorspace. Buildings 20 and 21 have changed back to a terrace row of housing (comprising lower rise buildings) to address neighbouring amenity impact and heritage concerns (which formed part of the GLA's reasons for refusal) on the adjacent rear properties of Parliament Mews and rear gardens on Thames Bank. The final building heights are presented in **Chapter 5: The Proposed Development**.

#### **Land Uses**

4.36 As indicated previously, fundamentally different alternative uses of the Site, or the mix of uses of the Site, beyond those identified in the Planning Brief were not considered. However, the type and location of education land uses, residential accommodation and to some extent commercial land use quantum were further considered, as discussed below.

#### *Education Uses and Location of the School*

4.37 Although the 2011 Planning Brief indicates a primary school should be provided as part of the proposals, the LBRuT Council's Cabinet decision in October 2015 was that instead, a secondary school with a sixth form would be required as part of the redevelopment of the Site. As such, this has necessitated a departure from the Planning Brief to accommodate the school and associated sports facilities.

4.38 Owing to the requirement of the secondary school with sixth form to achieve the requirements set out in the within the Education and Skills Funding Authority (ESFA) Building Bulletin 103: Area Guidelines for Mainstream Schools<sup>5</sup> and LBRuT capacity requirements, together with the preference of the Planning Brief to include education uses within the west of the Site, a comprehensive exercise was carried out by the Applicant's design team to identify the optimal location for the new school requirement. Various locations for the school were considered, and the ESFA confirmed that, for any option, the existing grass playing fields would not be suitable to provide the necessary school play and sports provision. Eventually, the preferred location was selected with the school to the east of the planning field, and a new sports pitch (full size 3G football pitch) provided. The Open Spaces and Playing Pitches Assessment (OSPPA), prepared by project planning consultant Gerald Eve, contains a full assessment of all locations considered as follows:

- to the south of the of the existing Watney's Sports Ground playing fields, adjacent to Lower Richmond Road, with a sports pitch situated to the north, surrounded by residential units. This option was discounted as the residential units and new school buildings would block views into the area once occupied by the existing sport pitch which is designated as Other Open Land of Townscape Importance (OOLTI) (refer to **Chapter 3: Existing Land Uses and Activities** for further details);
- within the far west of the existing Watney's Sports Ground playing fields, adjacent to Williams Lane, with the newly provisioned sports pitch to the east (as indicated in **Figure 4.1**). This option was also discounted due to an undesirable continuous built form opposite the existing Williams Lane properties;

- to the north of the existing Watney's Sports Ground playing fields, refined to include a Multi-Use Games Area (MUGA) to the west of the building adjacent to Williams Lane, newly provisioned sports pitch and community park to the south (as indicated in **Figure 4.2**). A play area would be situated above the school building. This option was discounted following further discussions with LBRuT and ESFA as the option for the school to be located to the east was preferred as it was LBRuT's view that this is the closest representation of the Planning Brief (in that it limits the amount of new-build on the footprint of the existing playing field).
- to the east of the existing Watney's Sports playing fields, with the newly provisioned sports pitch to the west and the MUGA and community park to the south. This option was taken forward as it resulted in increased school play space and open space of the existing playing field would be retained in its current position. The proposed school footprint would also not encroach as far into the existing playing field area as with the above options. This option is described in **Chapter 5** and indicated in planning application drawing **C645\_MP\_P\_00\_001**.

- 4.39 In response to the Sports England post-submission comments on the 2018 Planning Applications, the following acoustic mitigation measures were assessed and incorporated for Application B as part of the July 2020 Amendments:
- installation of a 2.5m high clear acoustic fence around the northern and western perimeter of the school sports pitch, set back from the proposed 4.5m high twin bar super rebound fence (mesh weld fence with EPDM inserts) surrounding the sports pitch (refer to landscape drawing P10736-00-001-131-09); and
  - installation of a 3m high fence around the Multi-Use Games Area (MUGA) (refer to landscape drawing P10736-00-001-131-09).
- 4.40 The floorspace area, layout, and massing of the school and acoustic mitigation for Application B remains as per the previous design for the Development.

#### *Residential Land Uses*

- 4.41 As set out within planning policy, the Site is indicated as appropriate for a residential-led mixed use scheme. As such, residential land uses are allocated across this area of the Site. However, as indicated within **Chapter 3**, most of the Site lies within defended Flood Zone 3 and is at a high probability of tidal flooding. This necessitates that the design considers the implications should the flood defences fail (the flood breach level). Accordingly, the design of the Development has ensured that all residential units as a minimum would be located at least 300mm above the breach flood level, and basements are only utilised for car parking and building services plant.
- 4.42 The masterplan presented at the public consultation event in March 2017 for the 2018 Planning Applications proposed approximately 980 residential units across the Site including affordable housing and 190 extra care (assisted living) units. During the design process, the number of residential units reduced owing to the reduction in massing; the July 2017 public consultation presented 730 residential units, with 126 assisted living units and the introduction of a nursing home. The number of proposed residential units further reduced to a final number of up to 667, plus up to 150 units either for residential or assisted living use.
- 4.43 As detailed in **Chapter 1**, following submission of the 2018 Planning Applications, a package of substitutions was submitted to LBRuT for consideration (the 'May 2019 Amendments'), which

sought to address comments raised by consultees during determination (such as the Environment Agency and LBRuT Conservation officers). The May 2019 Amendments comprised internal reconfiguration to building layouts and levels to buildings 2,3, 6, 8 and 9 (resulting in a reduction in four residential units to a total of 663 residential units plus the 150 flexible residential units and minor change in land use areas); landscaping changes; and alterations to the building material and façade treatments.

- 4.44 In order to meet GLA's housing targets, the July 2020 Amendments increased the number of residential units from 813 units (including the up to 150 flexible assisted living and / or residential units) to up to 1,250 units (which resulted in removing the 150 flexible assisted living units and nursing home) and increasing the level of affordable housing provision from up to 17% to up to 30%. Affordable housing was also introduced into Development Area 1 (detailed element of the Development, east of Ship Lane) to enable earlier phasing of affordable housing delivery and a more through mixture of tenures across the Site.
- 4.45 Following refusal of the July 2020 Amendments for reasons of height and massing, the Development has reduced its height and massing, including re-configuring Blocks 20 and 21 back to their original 2018 layout, which has resulted in a reduction in the number of residential units by 165, from up to a total of 1,250 units to up to a total of 1,085 units, leading to an affordable housing provision of up to 22% on habitable rooms (subject to further viability discussions with LBRuT).
- 4.46 The final quantum of residential units is described within **Chapter 5: The Proposed Development**.

#### *Commercial Land Uses*

- 4.47 The Development proposes a range of flexible uses at the lower floors of the majority of the buildings to the east of Ship Lane, around the proposed new High Street. It is unknown at this stage the exact demand for the various uses and hence flexibility is required to respond to market demand and scheme evolution. The intention is for a range of types of uses to be provided across the eastern side, but at the same time, ensure that no one particular use class dominates the spaces, thus ensuring a truly mixed-use development. As such, flexible use within the detailed component of the Development is sought for retail, financial and professional services, café / restaurants, drinking establishments, offices, community, and boathouse use.
- 4.48 Following feedback from LBRuT in June 2017, it was raised that the Site should not be a retail destination. The maximum 3,000 m<sup>2</sup> of retail floorspace proposed within the overall flexible use space of 6,118 m<sup>2</sup> was considered too much and that office floorspace should be increased. As a result, changes were made to the Development, including building layouts on the east side of the Development and consequently a change in floor areas. The final overall maximum flexible floorspace has been reduced to 4,839 m<sup>2</sup>, with maximum retail floorspace reduced to 2,200 m<sup>2</sup> and maximum office floorspace increased to 2,200 m<sup>2</sup>. However, it should be noted that it is sought to ensure that the High Street Zone contains a suitable mix of high street uses and therefore a significant proportion of retail use. It is therefore sought through planning condition that 50% of the flexible use floorspace is occupied for retail purposes.
- 4.49 To provide more residential units and affordable housing provision, the July 2020 Amendments removed the nursing and care home, and gym land uses to increase the residential floorspace areas. Additional flexible use space, such as in the Bottling Building (Building 5) was also

incorporated to provide community use at this location. The cinema (Building 1) was reconfigured by decreasing cinema use floorspace, adding another basement level for ancillary use, and incorporating more office floorspace area, which resulted in further refinement of the façade of this building to match the colour of the adjacent Jolly Gardeners Pub (Building of Townscape Merit – BTM). In September 2020, following consultation with the GLA, minor revisions to the proposed design of Building 1 (the September 2020 Amendments) comprised minor amendments to the design of the roof which reduced the height of the building by 2m, with no changes proposed to the floorspace or storey number.

- 4.50 The Development comprises the same mix of uses and floorspace areas as the July 2020 Amendments of the 2018 Planning Applications, apart from an overall reduction in flexible uses and residential floorspace area. The final quantum of commercial land use is described within **Chapter 5: The Proposed Development**.

#### **Architectural Style, Treatment and Built Heritage Considerations**

- 4.51 Three different building styles were considered for the detailed component of the Development within the east of the Site, a warehouse typology, a mansion block typology, and standalone building typology (in addition to the converted heritage buildings). The design of the building form was refined through an iterative design process:
- drawing on the historic industrial context of the Site, the warehouse typology buildings are located mostly along the southern part of the Site adjacent to Mortlake High Street;
  - drawing on several prominent examples common to other locations along the river from Mortlake to Chelsea, the mansion block typology buildings are located adjacent to the river, opening directly to the river frontage with varied heights and articulation of massing. These buildings were refined by the introduction of distinctive features, including corner elements, and varied red tone brick colours; and
  - a stand-alone cinema building typology was developed for the cinema fronting Mortlake High Street and Mortlake Green on account of its public significance, prominent position, and specific internal use requirements, located at the corner of the green link. The façade design of the cinema was further refined as part of the July and September 2020 Amendments to adapt to its inclusion of office use, whilst still following the principles of the cinema building typology.
- 4.52 Further detail on these building typologies is described in **Chapter 5: The Proposed Development**.
- 4.53 Following consultation with LBRuT as part of the 2018 Planning Applications, the white rendered façade of the school was changed to brick to ensure consistency with the wider Development.
- 4.54 To reference the historic industrial context of the Site, as part of the 2018 Planning Applications, Building 16 (now referred to as Building 9 within the Development) adjacent to Bulls Alley within the far east of the Site was altered from a mansion typology to a warehouse typology. The reason for this change is when viewed from across the River Thames this creates a definitive Site boundary, that was once a brewery between the Maltings and Building 16 (as demonstrated by **Figure 4.4** in comparison to **Figure 4.3**).
- 4.55 Built heritage advice was also considered regarding the façade treatment of the Maltings (a BTM) and its historic context within the Site. Given its historical prominence facing the River Thames,

the Maltings building would be retained in its entirety. The treatment of the northern elevation of the Maltings, in particular the recessed brickwork, was considered in light of the conversion of the building to accommodate residential and cultural uses and sensitive design alterations were made. Given that the Former Hotel Building and the Former Bottling Building within the Site are also BTMs, the façade of these buildings would be retained.

- 4.56 In response to LBRuT Conservation officers, the May 2019 Amendments comprised the following alterations related to building materials and façade treatments to visually enhance the Development and preserve the aesthetic value of the BTMs on-Site:
- turret elements of Buildings 2, 7 and 8 amended to provide a hierarchy of window openings and more refined top to the buildings;
  - omission of the projecting bay window to the north façade of Building 3;
  - amendment to the gable elements of Buildings 2, 3, 7, 8, 11 and 12 to provide a varied parapet line;
  - changes to the façade of the Bottling building (Building 5), including the re-instatement of chimneys and windows. Replacement roof material to be made of slate;
  - placement of double-height windows on the Maltings building (Building 4). The decorative balustrades to Juliette balconies of the Maltings building have been omitted and the existing columns re-located within the ground floor entrance area to the community use space;
  - introduction of additional doors to access community use space and incorporation of historic columns on Maltings building (Building 4);
  - inclusion and re-location of existing historic columns in Bottling building (Building 5);
  - bottling building (eastern part of Building 5) to have a timber infill instead of brick infill to the former hoist door;
  - selected intermediate piers at ground floor at Bottling building (Building 5) omitted to increase the amount of glazing; and
  - the Hotel (western part of Building 5) windows that face Building 6 would be obscured.
- 4.57 Further refinements were made to the mansion blocks as part of the current Applications to address the height changes across the Development, and to ensure the articulation of the facade accommodates the additional height. This included more definition of the hierarchy of the building massing to have a clearly defined bottom, middle and top. These changes were made to prevent the buildings from appearing overbearing and to better respond to the streetscape and active frontages at ground level.
- 4.58 The Bottling building (Building 5) has been redesigned to incorporate a metal plant enclosure. This is to facilitate the inclusion of Air Source Heat Pumps (ASHPs) within the Development (see energy strategy section later), as well as provide a more industrial finish in keeping with the nature of the existing façade and similar in form to the roof on the adjacent Hotel building (Building 5).
- 4.59 The 2018 ES stated that existing memorial plaques and brewery gates associated with the Former Stag Brewery would be re-located within the Development. As part of the May 2019 Amendments the following additional details were provided:
- two memorial plaques are to be positioned on the east wall of the Maltings building facing Maltings Plaza;

- the Stag sign is proposed to be positioned on the Bottling building;
  - the Watney brewery gates to be positioned to the opposite end of Thames Street; and
  - the two Stag Brewery gates to Mortlake High Street (adjacent to the pedestrian crossing and entry to the Development between Buildings 5 and 10) and the northern end of the Green Link.
- 4.60 The July 2020 Amendments included the incorporation of heritage interpretation boards in the Maltings Plaza to further enhance the appreciation and understanding of the heritage assets on-Site.
- 4.61 Further detail is provided in **Chapter 15: Built Heritage** and **Chapter 5: The Proposed Development** on the final proposed built heritage design considerations.

#### Flood Defence

- 4.62 In response to the EA requirement to include permanent passive flood defence design at Ship Lane, the May 2019 Amendments included the following:
- extending the northern façade of Building 9 by including a raised ground floor terrace incorporated into the flood wall, replacing ground level landscaping in this location; and
  - raising Building 9 internal ground floor levels (as previously reported).
- 4.63 Further consultation with the EA resulted in the following design changes which formed part of the July 2020 Amendments:
- the access doors on Building 9 (boat storage facility) would be widened to facilitate access/egress; and
  - the lowest sill on the northern elevation of the Maltings Building (which forms part of the flood defence) would be raised from +5.89m AOD to +6.73m AOD (matching the level of the rest of the window sills on this façade), in response to the EA's requirement that this should be above the statutory flood defence line (6.7m AOD) (refer to **Appendix 12.5** for the EA briefing note from the 2018 Planning Applications).
- 4.64 Taking on board the above design changes, no further changes to the design of the flood defences and mitigation for flood risk are considered to be required for the Development.

#### Energy Strategy

- 4.65 The 2018 Development comprised two energy centres for Application A, with one located within each basement, and one located on the second floor of the school for Application B. These energy centres comprised gas fired boilers and gas fired Combined Heat and Power (CHP) units. In line with the London Plan (2021)<sup>6</sup>, the energy strategy has been revised to replace the gas boilers and CHP with an Air Source Heat Pump (ASHP) scheme. The Bottling building (Building 5) incorporates the ASHPs for the whole of Development Area 1, and therefore has resulted in a small loss of office area and associated glazed element which has been replaced by a roof plant enclosure (as discussed above).
- 4.66 Further details on the revised energy strategy are provided in **Chapter 5: The Proposed Development**.

## Transport Infrastructure

### *Parking*

- 4.67 As set out within the Planning Brief, LBRuT guidance indicates that at least one car parking space is required per residential unit. This allocation was therefore incorporated into earlier design iterations. However, concerns were raised at the public consultation events with the overall density of the emerging scheme and number of new residents, all of whom may own a car. A lower car parking ratio was also welcomed by TfL following an initial meeting in August 2016 given the scale of the Development, the short walk to Mortlake Station and traffic conditions on surrounding roads. In response, and in consultation with LBRuT the car parking provision was reduced to approximately 0.7 of a space per residential unit. This reduction in the number of car parking spaces, including reductions for both residential and non-residential spaces, minimised the size of the basements required. As part of the July 2020 Amendments, the western basement was reduced in size, resulting in an overall reduction in car parking spaces of 186 spaces, and an additional basement storey beneath Building 1 (the cinema) was introduced for ancillary space. This change has been made to reduce the impact on the surrounding traffic and reduce construction costs, enabling a larger proportion of affordable housing.
- 4.68 The final number of proposed parking spaces are detailed in **Chapter 5: The Proposed Development**.

### *Highways Works*

- 4.69 As previously noted, the Planning Brief indicates that redevelopment at the Site must consider existing traffic issues including congestion. Furthermore, the Planning Brief identifies that redevelopment of the Site should minimise adverse effects to the surrounding area and the amenity of nearby residents. On this basis and following a review of existing traffic conditions, together with comprehensive consultation, it was identified that the operation of the junction with the A316 (Clifford Avenue) and Lower Richmond Road at the Chalkers Corner junction and, in particular, congestion and delay on Lower Richmond Road was a key design consideration. Furthermore, TfL have since confirmed that an increase in capacity at Chalkers Corner is necessary to facilitate the Development.
- 4.70 Although the version of the proposed highways and landscaping design at Chalkers Corner (refer to **Figure 4.7**) presented at the March 2017 public consultation event would have mitigated over and above the additional traffic generated by emerging scheme and would have provided additional off-street car parking, together with the provision of cycle lanes along Lower Richmond Road, the design was modified owing to the following matters which were raised at the March 2017 public consultation, from the CLG and LBRuT:
- a preference for landscaping rather than additional car parking within the existing area of off-street car parking;
  - loss of existing mature trees and landscaping including perimeter wall and fencing at Chertsey Court;
  - the encroachment of the green space fronting Chertsey Court;
  - the increased proximity of Lower Richmond Road to Chertsey Court through the introduction of an addition lane of traffic travelling from east to west (three in total), and to accommodate one from west to east;

- the concern that the additional capacity would attract a greater amount of through traffic into Mortlake; and
  - loss of on-street car parking along Lower Richmond Road
- 4.71 To address the matters listed above, the design for Chalkers Corner presented at the July 2017 public consultation, the design was refined as follows (refer to **Figure 4.8**):
- retention of the existing off-street car parking area, with the creation of a pocket park at the pedestrian road crossing intersection at Lower Richmond Road;
  - provision of compensatory semi-mature tree planting adjacent to Chertsey Court, Clifford Avenue and Lower Richmond Road;
  - provision of wider islands to accommodate cycle crossing across Clifford Avenue and Lower Richmond Road, together with the introduction of advanced stop lines on the A316 Lower Richmond Road approach arms;
  - the introduction of a cycle feeder lane from east to west along Lower Richmond Road;
  - the introduction of a wider 4 m to 4.5 m pavement around the corner between Lower Richmond Road and A316 to enable shared use between pedestrians and cycles; and
  - A reduction in the length of the additional westbound lane on Lower Richmond Road to two.
- 4.72 This option was taken forward as part of the 2018 Planning Application as Application C (planning ref: 18/0549/FUL and GLA ref: 4172b), however it was refused by LBRuT's Planning Committee in January 2020. Following this refusal, as part of the July 2020 Amendments, alternative highways options were explored based on previous designs provided by TfL and a review of the potential for a bus lane to be implemented along Lower Richmond Road. The options considered did not include works to the land at Chertsey Court or the north side of Lower Richmond Road and would be wholly within the adopted highway land. The four options considered were as follows:
- Option 1: No Change ('Do Minimum') (refer to **Figure 4.9**);
  - Option 2: Chalkers Corner 'Light' Scheme (new left-hand lane westbound on Lower Richmond Road) (refer to **Figure 4.10**);
  - Option 3: Option 1 but with a dedicated bus lane westbound on Lower Richmond Road (refer to **Figure 4.11**); and
  - Option 4: Option 2 but with a dedicated bus lane westbound on Lower Richmond Road (refer to **Figure 4.12**).
- 4.73 Based on the assessments undertaken in terms of transport, air quality and noise, the preferred option to take forward was Option 2 (the Chalkers Corner Light Scheme). Consequently, the Applicant formally withdrew Application C in November 2020.
- 4.74 Option 2 involves the reconfiguration of the informal parking area used by residents at this location along Lower Richmond Road, as such alternative informal and formal parking arrangements designs were reviewed. The proposed layout requires the loss of approximately 6 undesignated parking spaces for residents adjacent to this area on Lower Richmond Road. On review, parking bays have been kept informal as if these bays were formalised, the proposed layout would only be able to accommodate 3-4 designated car parking spaces.

4.75 The proposed highways works is described in more detail within **Chapter 5: The Proposed Development**.

*River Thames Transportation*

4.76 As indicated in **Chapter 3**, a disused wharf is situated within the north east of the Site with limited access via Bulls Alley. On account of the aforementioned traffic congestion issues in proximity to the Site, and the promotion of a variety of transport options set out in the Planning Brief, consideration was given to the use of the River Thames for removal of demolition and excavation waste, the delivery of construction materials, and provision of public transport to and from the Site. However, owing to the following reasons this was discounted at this stage of the planning process:

- due to the variance in tidal range, at low water the foreshore is exposed and therefore watercraft can only move to and from the wharf either side of high water. Similarly, the draft of the watercraft would need to be appropriate for the depth of water at these times. As such, loading and unloading of freight and passengers, together with maintenance, would be affected by tidal movements;
- likely closure of the tow path (part of the Thames Path National Trail Walking Route) during the demolition and construction work (the Works) and subsequent re-routing of pedestrian and cycles;
- the costs required to repair and upgrade the wharf to ensure safe access for freight and passengers;
- distance to a suitable facility to load and unload the various materials associated with the Works, including prefabricated building materials and plant at other locations along the River Thames. Suitable locations include the stretch of River Thames between Greenwich to Tilbury, and locations west of Mortlake in proximity to the M25. In both cases, these would have a river journey time in the order of 5 - 6 hours, considerably longer than by road. Furthermore, it is anticipated that some transportation by road would still be inevitable;
- navigational conflicts with other river users such as rowers; and
- existing River Bus services currently terminate at Putney Pier and provide a commuter service to Blackfriars at an approximate half hourly frequency on weekday mornings and evenings with a journey time of around 45 minutes. The Site is approximately 6.2km from Putney Pier. As such, the overall journey time to Blackfriars would be approximately 1hr 15 minutes. Given that train services from Mortlake to central London (e.g., London Waterloo) can be approximately 30 minutes in length, river travel was not considered feasible.

## References

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- 1 London Borough of Richmond upon Thames (2018): Local Plan, adopted July 2018.
- 2 London Borough of Richmond upon Thames (2011). Stag Brewery, Mortlake, SW14 Planning Brief, Supplementary Planning Document. LBRuT: Richmond
- 3 London Borough of Richmond upon Thames (2015). Mortlake Village Planning Guidance, Supplementary Planning Document. LBRuT: Richmond
- 4 Department for Communities and Local Government (2021). National Planning Policy Framework, last updated July 2021.
- 5 Education Schools Funding Association (2014). Building Bulletin 103: Area guidelines for mainstream schools.
- 6 Greater London Authority (2021); 'The London Plan: The Spatial Development Strategy for Greater London, March 2021.