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Your Ref:

Date: 28 September 2020

Greater London Authority
Planning Department
City Hall
The Queen's Walk
London
SE1 2AA

Dear Sir/Madam

RE: Stag Brewery Lower Richmond Road, Mortlake, London, SW14 7ET – Application A – September 2020 Amendments

Waterman Infrastructure & Environment Limited (Waterman) has reviewed the September 2020 Amendments to the proposed design for Stag Brewery Application A, made as substitutions to the previously submitted application. On the basis of the review, no further environmental assessment is considered to be required to support the application. It is considered that the findings of the Environmental Impact Assessment, as reported in the Environmental Statement of February 2018 (as amended by the May 2019 and July 2020 Environmental Statement Addenda) submitted in support of the Applications A, B and C (plus options for highways improvements by way of a Section 278) remains accurate and continues to be representative of the likely significant environmental effects of the Stag Brewery Development.

This Environmental Statement Addendum has been lawfully undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) and as such this letter is to demonstrate our finding that no significant environmental effects arise from the amendments. Consideration of each technical chapter of the Environmental Statement is provided as Annex 1 to this letter.

Should you have any queries or wish to discuss the conclusions of this letter, please do not hesitate to contact us.

Yours sincerely



Steve Brindle
Associate Director
For and On Behalf of Waterman Infrastructure & Environment Ltd

Enc. Annex 1 – Review of the Amendments in relation to the Environmental Impact Assessment
Annex 2 – Updated Viewpoints 1b and 10

Annex 1 – Review of the Amendments in relation to the Environmental Impact Assessment

Non-Technical Summary

Following consultation with the Greater London Authority, minor revisions to the proposed design of Building 1 of Application A (which is proposed to house a cinema and office uses) are proposed. These comprise of minor amendments to the design of the roof which reduces the height of the building by 2m, with no changes proposed to the floorspace or storey number. In order to ensure that the Environmental Statement accurately reflects the likely significant impacts of the September 2020 amended proposals, the Environmental Statement, as amended by the Environmental Statement Addenda of May 2019 and July 2020, has been reviewed, and the findings are set out in this, September 2020 Environmental Statement Addendum, document.

Each technical topic has been considered, and where necessary additional supporting information, including revised viewpoints has been provided. It is considered that the EIA remains valid as an assessment of the likely significant environmental effects of the Development as a result of the amendments. This document, prepared by Waterman, should be read in conjunction with the Non-Technical Summaries set out in the 2018 ES, the May 2019 ES Addendum and the July 2020 ES Addendum.

Introduction

In February 2018, Reselton Properties Limited (the 'Applicant') submitted three separate planning applications which were proposed to be linked via a Section 106 Agreement (referred to as Application A, Application B and Application C, refs. 18/0547/FUL, 18/0548/FUL and 18/0549/FUL) to the London Borough of Richmond Upon Thames (LBRuT) to facilitate the redevelopment of land predominantly on the former Stag Brewery, along with predominantly highway land to the west. A summary of each of the Applications is set out below:

- Application A – hybrid planning application for comprehensive mixed use redevelopment of the former Stag Brewery site consisting of:
 - Land to the east of Ship Lane applied for in detail (referred to as 'Development Area 1' throughout); and
 - Land to the west of Ship Lane (excluding the school) applied for in outline (referred to as 'Development Area 2' throughout).
- Application B – detailed planning application for the school (on land to the west of Ship Lane).
- Application C – detailed planning application for highways and landscape works at Chalkers Corner.

The 2018 Planning Applications were accompanied by an Environmental Statement (2018 ES) which considered all three separate planning applications together as one comprehensive redevelopment proposal. The 2018 ES reports the key findings of the Environmental Impact Assessment (EIA) process in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations, 2011 (as amended 2015)¹ (the '2011 EIA Regulations').

¹ HMSO (2015) Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015).

Following submission of the 2018 Planning Applications, a package of substitutions was submitted to LBRuT for consideration, which sought to address comments raised by consultees during determination. This included minor amendments to the 2018 Development in May 2019 (the 'May 2019 Amendments'), which were accompanied by an ES Addendum (the 'May 2019 ES Addendum'). 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 and change in land use areas); landscaping changes; and alterations to the building material and façade treatments.

On 29 January 2020, the 2018 Planning Applications were heard by LBRuT's Planning Committee, with a recommendation for approval. The Committee resolved to grant Applications A and B, and refuse Application C. The granting of Applications A and B was subject to the following:

- Conditions and informatives as set out in the officer's report, published addendum and agreed verbally at the meeting;
- Amendments to the Heads of Terms and completion of a Section 106 Legal Agreement which was delegated to the Assistant Director to conclude;
- No adverse direction from the Greater London Authority ('GLA'); and
- No call in by the Secretary of State for Housing, Communities and Local Government.

The Applications have subsequently been referred to the GLA, and the Mayor has given a direction that the GLA will become the determining authority for the determination of the 2018 Planning Applications and act as local planning authority in relation to all three applications.

The Applicant has engaged with the GLA in respect of the proposed amendments to the Development, and in July 2020 a number of amendments were made to the application by way of substitutions. These are summarised as follows:

- Increase in residential unit provision from up to 813 units (this includes the up to 150 flexible assisted living and / or residential units) to up to 1,250 units;
- Increase in affordable housing provision from up to 17% to up to 30%²;
- Increase in height for some buildings, of up to three storeys compared to the Original Scheme;
- Change to the layout of Buildings 18 and 19, conversion of Building 20 from a terrace row of housing to two four storey buildings;
- Reduction in the size of the western basement, resulting in an overall reduction in car parking spaces of 186 spaces, and introduction of an additional basement storey beneath Building 1;
- Other amendments to the Development including amendments to internal layouts, re-location and change to the quantum and mix of uses across the Site, including the removal of the nursing home and assisted living in Development Area 2;
- Landscaping amendments, including canopy removal of four trees on the north west corner of the Site; and
- Further options to the works proposed at Chalkers Corner which could be implemented in lieu of those proposed under Application C. These alternative options do not include works to the land at Chertsey Court or the north side of Lower Richmond Road, and it is anticipated that these works

² Habitable room %s assume existing buildings on Site can be classified as 'occupied' for the purposes of Community Infrastructure Levy ('CIL').

would be undertaken within the presently adopted highways land.

Minor amendments were also made to the road and pedestrian layouts for the school (Application B). No other amendments were proposed to Application B.

These changes are being brought forward as substitutions to Applications A and B (refs. 18/0547/FUL and 18/0548/FUL), which are related applications (to be linked via a Section 106 Agreement). The works as proposed under Application C (ref. 18/0549/FUL) (Chalkers Corner) were not withdrawn, and were supplemented by a number of alternative options which may be carried out entirely within adopted highway land, and would therefore not require separate planning permission. It should be noted that the highway works scheme proposed as an alternative to Application C are proposed under Section 278 are illustrative and final details will be secured with TfL via the Section 278 process in due course. If it is agreed that all necessary highway works are to be completed within the adopted highway then Application C may be withdrawn.

It is acknowledged that the highways works are required to mitigate for adverse traffic impacts predicted with the completed and operational Development, and that this mitigation is to be delivered by the highways works. Four different highways options, in addition to Application C, are assessed within the July 2020 ES Addendum to ensure that the likely significant effects of the final design can be considered in the decision making process. Should further design of the highways works come forward that would be outside of the designs assessed in the 2018 ES (as amended), it may be necessary to undertake further environmental assessment of these revised proposals.

In September 2020, further design amendments are proposed, by way of a substitution, to make minor changes to the design of Building 1 of Application A only, as set out in further detail in the Proposed Development section of this letter. The 2018 ES, May 2019 ES Addendum and July 2020 ES Addendum have been reviewed in light of these amendments (referred to as the 'Application A Amendments'), and this letter forming the September 2020 ES Addendum provides our professional opinion on whether the findings of the EIA remains valid as an assessment of the likely significant environmental effects of the Development as a result of the amendments. This document, prepared by Waterman, should be read in conjunction with the 2018 ES, the May 2019 ES Addendum and the July 2020 ES Addendum, and these documents collectively constitute the ES (hereafter referred to as the '2018 ES (as amended)'). A supplementary review of the ES Non-technical Summary (NTS) has been undertaken and provided.

September 2020 Amendments

It is understood that the Application A September 2020 Amendments relate solely to Building 1 of Application A (which is proposed to house a cinema and office space) and these shall comprise minor amendments to the design of the roof which reduces the height of the building by 2m. No amendments to other elements of the building, including storey numbers or proposed floorspace are proposed.

The substitutions are shown in the revised planning drawings, and Design and Access Statement Addendum, prepared by Squire & Partners, both of which should be read in conjunction with this document.

Effect of the Changes upon the Findings of the Environmental Impact Assessment

Each of the technical chapters of the February 2018 Environmental Statement, as amended by the May 2019 and July 2020 Environmental Statement Addenda (hereafter the 'Current ES') has been reviewed to determine if the changes described above are likely to affect the likely significant effects previously identified. Unless stated otherwise the September 2020 Amendments will result in no change from the effects set out in the Current ES. This review is presented within the following paragraphs.

Socio Economics

The September 2020 Amendments would not materially impact upon the quantum of floorspace or Use Class within Building 1. Therefore, it not considered that there would be a material change to the socio-economic impacts presented in the Current ES, and as such, the potential impacts, mitigation measures and likely residual impacts reported remain valid.

Transportation and Access

The September 2020 Amendments would not materially impact upon the quantum of floorspace or Use Class within Building 1, nor result in any change to the number of car or cycle parking spaces proposed for the Development as a whole. Therefore the amendments would have no effect on trip generation or the assessment of transportation related effects previously presented in the Current ES. As a result, the potential impacts, mitigation measures and likely residual impacts reported remain unchanged.

Noise and Vibration

Since the September 2020 Amendments would result in no material changes to the trip generation rates forecasted to and from the Development, the traffic data used for the previous noise modelling and assessment in the Current ES remains valid. Therefore, the September 2020 Amendments would not materially alter the assessment of noise generated from traffic.

The September 2020 Amendments do not result in any change to the quantum of Use Class nor are any new or more sensitive land uses proposed, consequently, the most sensitive land uses within the Development have already been assessed.

Given that traffic generated noise would remain materially unchanged from that previously assessed and that all plant would be required to meet these statutory requirements, the overall findings of the potential impacts, mitigation measures and likely residual impacts associated with noise from the Development, as reported in the Current ES remain valid.

Air Quality

Since the September 2020 Amendments would result in no material changes to the trip generation rates forecasted to and from the Development, the traffic data used for the previous air quality modelling and assessment of traffic emissions in the Current ES remains valid. Similarly, the previous modelling and assessment of the energy centre remains unchanged.

The September 2020 Amendments do not result in any change to the quantum of Use Class nor are any new or more sensitive land uses proposed, consequently, the most sensitive land uses within the Development have already been assessed.

In light of above, the potential impacts, mitigation measures and likely residual impacts associated with air quality at and surrounding the Development, as reported in the Current ES, remain materially unaltered and valid.

Ground Conditions and Contamination

The September 2020 Amendments would not affect the extent of basements and any ground contamination would be removed during excavations of the basement and / or remedial measures, where necessary, as reported in the Current ES.

Given that any ground contamination would be required to be remediated to an acceptable level and that the amendments do not result in any new or more sensitive land uses that previously assessed,

the amendments would not materially change the contamination risks identified in the Current ES. Consequently, the potential impacts, mitigation measures and likely residual impacts of the Development as reported the Current ES would not be materially altered by the amendments and thus remain valid.

Surface Water, Drainage and Flood Risk

The September 2020 Amendments do not introduce any new land uses, nor are there any proposed changes to the strategy for managing storm water and foul water flows. The amendments do not materially affect vulnerability or flood risk previously assessed, and thus the conclusions and recommendations described in the Flood Risk Assessment within the Current ES remain valid. Similarly, the amendments do not require any alternative drainage regime, as such the drainage strategy remains valid.

The amendments do not result in any material changes to the assessment of the potential impacts, mitigation measures and subsequent nature and significance of likely residual impacts of the Development identified in the Current ES which, therefore, remain valid.

Ecology

No changes are proposed to the landscaping as part of the proposed September 2020 Amendments, therefore, the September 2020 Amendments do not alter the landscaping or proposed biodiversity enhancements. As a result, the previous ecological assessments presented in the Current ES, therefore, remains valid in light of the amendments.

Archaeology

There is no alteration to the below ground excavation required as a result of the September 2020 Amendments, therefore, the September 2020 Amendments do not materially affect the potential and likely residual impacts for the Development previously reported in the Current ES. The findings of the Current ES are, therefore, considered to remain valid.

Built Heritage

The proposals for Building 1 would result in a reduction of 2m in the overall height, and a change in the upper storey detailing, with the aim of improving the relationship between the building and the adjacent existing Jolly Gardeners public house. A review of the September 2020 Amendments, including the updated Viewpoints (1a and 10 – reproduced as Annex 2 of this letter), has identified that there would be no material changes to the assessment set out in the Current ES, the findings of which are considered to remain valid.

Townscape and Visual

The September 2020 Amendments would result in the reduction of Building 1 by 2m in height and changes to the detailing of the upper storey. These changes have been reviewed in relation to the townscape and visual assessments previously carried out and would be visible from viewpoints 1b and 10 which are included in Annex 2. The visual changes which can be seen from these two viewpoints are not considered to alter the original findings of the TVIA. Assessments of all other viewpoints are considered to be unaffected by the design changes. From a townscape perspective the overall massing and appearance of the proposed built form would not be altered in relation to the previous proposals.

There would be no change to the townscape and visual impacts reported in the Current ES, and the findings, therefore, considered to remain valid.

Wind Microclimate

RWDI has reviewed the September 2020 Amendments and confirmed that the amendments would not give rise to significantly altered wind conditions. As a result, the impacts as presented in the Current ES remain unchanged.

Daylight, Sunlight, Overshadowing and Light Pollution

EB7 has reviewed the September 2020 Amendments with respect to the effects they have on the daylight, sunlight, overshadowing and light pollution. The September 2020 Amendments are limited to the façade changes and a minor reduction in height, with no other alterations to massing. Therefore, the conclusions of the Current ES remain valid and materially unaltered.

Cumulative Effects

Due to the relatively minor nature of the proposed changes, it is considered that no additional cumulative effects would arise. It is anticipated that all new schemes that could result in cumulative effect will have considered the potential effects as set out in the Current ES. As of September 2020, no further additional cumulative schemes have been identified.

Given the scale, nature and location of the proposed September 2020 Amendments the likely significant impacts in combination it is not considered to be materially altered, and the impacts reported in the Current ES remain valid.



Annex 2 – Updated Viewpoints 1b and 10





THE TAPESTRY

LUNCH 5



1922
THE KELLY GARDENERS
YOUNG & CO BREWERY

WINE AND SPIRITS

LUNCHEON CLUB
THE SUIT
DRINKS
CK SEASON TICKET