

GLA
City Hall
The Queen's Walk
London
SE1 2AA

FAO: Nick Ray / Ashley Russell

15 July 2020

Our ref: NTH/SRO/AKG/SMAC/J7699

Your ref: 4172, 4172a & 4172b/01

Dear Sir / Madam,

**Former Stag Brewery, Lower Richmond Road, Mortlake, London
Chalkers Corner Road Junction, Junction of Lower Richmond Road, South Circular and
Clifford Avenue, Mortlake, London
Substitutions to Planning Applications refs: 18/0547/FUL, 18/0548/FUL and 18/0549/FUL
(LPA refs) and 4172, 4172a & 4172b/01 (GLA refs)**

On behalf of our client, Reselton Properties Limited, we write in respect of three planning applications at the Former Stag Brewery Lower Richmond Road, Mortlake, London and Chalkers Corner Road Junction, junction of Lower Richmond Road, South Circular and Clifford Avenue, Mortlake, London (refs: 18/0547/FUL ('Application A'), 18/0548/FUL ('Application B') and 18/0549/FUL ('Application C')) (as amended on 3 May 2019) to revise the scheme.

A summary of the Applications is set out below and revised descriptions of development have been provided at Appendix 1:

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

The Applications were submitted to the LBRuT in February 2018. The Applications are related and were proposed to be linked via a Section 106 Agreement. In May 2019, a package of substitutions was submitted to LBRuT for consideration, which sought to address comments raised by consultees during determination. On 29 January 2020, the Applications were heard at 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:

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

On 4 May 2020 the Mayor of London issued a Direction that he will act as the local planning authority for the purposes of determining the three planning applications.

In order to respond to issues raised by the Mayor in his Stage 1 report, the Applicant has engaged with the GLA to make amendments to the scheme. As a result of these discussions, a number of changes have been made to the scheme proposals which are summarised as follows:

- a. 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
- b. Increase in affordable housing provision from up to 17% to up to 30%;
- c. Increase in height for some buildings, of up to three storeys compared to the Original Scheme;
- d. Change to the layout of Buildings 18 and 19, conversion of Block 20 from a terrace row of housing to two four storey buildings;
- e. 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 (the cinema);
- f. Other amendments to the masterplan 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;
- g. Landscaping amendments, including canopy removal of four trees on the north west corner of the Site; and
- h. Alternative options being explored to Chalkers Corner highways works in order to mitigate highways impacts

The submission documents have tested an affordable housing provision of 30% in order to provide a robust assessment. However, it should be noted that the final affordable housing level is subject to further viability testing and discussions with the GLA.

Minor amendments have also been made to the road and pedestrian layouts for the school (Application B). No other amendments are proposed to Application B. No amendments are proposed to the physical works proposed under Application C, although alternative options within the highway boundaries for mitigating the highway impact of the amended proposals have been assessed within the relevant substitution documents for Applications A and B and are the subject of ongoing discussions with the GLA and TfL.

A full schedule of changes is included at Appendix 1 of this letter.

These changes are being brought forward as substitutions to Applications A, B and C (refs. 18/0547/FUL, 18/0548/FUL and 18/0549/FUL), which are related applications (to be linked via a Section 106 Agreement).

It is important to note that no changes are proposed to the physical works proposed under Application C – the only change to this application is that the supporting documents (which include all documents submitted under Applications A and B) have been updated in the context of the proposed changes to the scheme as sought under Applications A and B. Application C was resolved to be refused by LBRuT at Committee on 29 January 2020. As a result, whilst the works proposed in Application C are still an available option, the Applicant has progressed alternative approaches for addressing and mitigating the impacts on surrounding highways, and these have been tested within the relevant substitution documents for Applications A and B. All of these options are subject to ongoing discussions and testing with TfL. They are all within the existing highway boundaries and if agreed would not, in themselves, require planning consent.

Accordingly, Application C remains 'live' within this substitution package and is shown on the application boundary plans. This is the governing paragraph on this matter within the substitution package. For environmental assessment purposes the present Application C works were considered as part of the original scheme environmental assessment, and the alternative options have been assessed as part of the submission documents. The professional team consider that the material properly and effectively assesses all likely significant environmental effects.

Documents

In order to assist officers in the determination of the Applications, at Appendix 3 we set out a list of the documents submitted which have been prepared to reflect the proposed revisions to the Applications, and whether these documents have been submitted as revisions or addendums to the original submission documents.

We have also provided under separate cover an excel 'Document Tracker' which sets out all the relevant revisions / addendums for plans and documents submitted since February 2018. For the avoidance of doubt, a number of plans have been submitted as illustrative and a number for formal approval purposes.

Next Steps

We look forward to receiving confirmation of receipt of the substitution documents and the commencement of the re-consultation period.

In the meantime, please contact Neil Henderson or Suzanne Thurtle of this office should you have any questions.

Yours faithfully



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Appendix 1 – Revised Descriptions of Development
Appendix 2 – Summary Schedule of Amendments
Appendix 3 – List of Submission Documents

Appendix 1 – Revised Descriptions of Development

Application A

The following Description of Development is now proposed:

“Hybrid application to include the demolition of existing buildings to allow for the comprehensive phased redevelopment of the site:

Planning permission is sought in detail for works to the east side of Ship Lane which comprise:

a) Demolition of existing buildings (except The Maltings and the façade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks

b) Alterations and extensions to existing buildings and erection of buildings varying in height from 3 to 10 storeys plus a basement of one and two storeys below ground

c) residential apartments

d) Flexible use floorspace for:

i. Retail, financial and professional services, café/restaurant and drinking establishment uses

ii. Offices

iii. Non-residential institutions and community use

iv. Boathouse

e) Hotel / public house with accommodation

f) Cinema

g) Offices

h) New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works

i) Provision of on-site cycle, vehicle and service parking at surface and basement level

j) Provision of public open space, amenity and play space and landscaping

k) Flood defence and towpath works

l) Installation of plant and energy centres

Planning permission is sought in outline with all matters reserved for works to the west of Ship Lane which comprise:

a) The erection of a single storey basement and buildings varying in height from 3 to 8 storeys

b) Residential development

c) Provision of on-site cycle, vehicle and service parking

d) Provision of public open space, amenity and play space and landscaping

e) New pedestrian, vehicle and cycle accesses and internal routes, and associated highway works”

Application B

No amendments are proposed to the description of development for Application B.

Application C

No amendments are proposed to the description of development for Application C.

Appendix 2 – Summary Schedule of Amendments

	Original Scheme (i.e. February 2018 Submission, May 2019 Substitution and subsequent amendments), as taken to LBRuT Planning Committee 29 January 2020	Revised Scheme (i.e. current substitution submission)
1	<i>Land Uses</i>	
a	Up to 813 residential units including either 150 flexible assisted living or residential accommodation units) (of which up to 525 private and up to 138 affordable)	Up to 1,250 residential units (of which up to 894 private and up to 356 affordable)
b	4,686 sqm flexible use floorspace for use as Class A1, A2, A3, A4, B1, D1, D2 and sui generis	5,023 sqm flexible use floorspace for use as Class A1, A2, A3, A4, B1, D1, D2 and sui generis Location of flexible use changed (remains within Development Area 1 to the east side of Ship Lane)
c	2,417 sqm office (Class B1) floorspace (in addition to space within flexible use floorspace) – 10% of all office space to be affordable workspace	5,532 sqm office (Class B1) floorspace (in addition to space within flexible use floorspace) – 10% of all office space to be affordable workspace
d	Hotel / public house with accommodation (1,673 sqm)	Hotel / public house with accommodation (1,765 sqm)
e	Cinema (2,120 sqm)	Cinema (1,606 sqm)
f	Gym (740 sqm)	Gym use removed from scheme
g	Up to 150 units of flexible use living accommodation for either assisted living or residential use (flexible Class C2 and/or Class C3)	Assisted living element removed from scheme
h	Nursing and care home (up to 80 en-suite rooms) with associated communal and staff facilities	Nursing and care home removed from scheme
i	School (9,319 sqm) (1,200 students and 60 FTE staff)	School retained as part of enlarged scheme. No changes proposed.
2	<i>Design and landscaping</i>	

a	Building heights ¹² comprising:	Building heights increased, comprising:
	Block 1 – 4 storeys (22m AOD)	Block 1 – approximately 5 storeys when compared to residential blocks, actually 4 large stories (25.78m AOD)
	Block 2 – 7-8 storeys (35.93m AOD)	Block 2 – 8-10 storeys (44.63m AOD)
	Block 3 – 6 storeys (28.03m AOD)	Block 3 – 7 storeys (30.93 AOD)
	Block 4 – 8 storeys (32.85m AOD – as existing)	Block 4 – 8 storeys (32.85m AOD – as existing). No change.
	Block 5 – 3 storeys (18.47m AOD)	Block 5 – 3-4 storeys (20.80m AOD)
	Block 6 – 4 storeys (21.68m AOD)	Block 6 – 5 storeys (24.98m AOD)
	Block 7 – 7-8 storeys (35.93m AOD)	Block 7 – 9-10 storeys (44.63m AOD)
	Block 8 – 6-8 storeys (35.93m AOD)	Block 8 – 9 storeys (37.93m AOD)
	Block 9 – 4-5 storeys (24.98m AOD)	Block 9 – 5 storeys (24.98m AOD). No change.
	Block 10 – 4-5 storeys (24.98m AOD)	Block 10 – 5-6 storeys (28.28m AOD)
	Block 11 – 7 storeys (31.33m AOD)	Block 11 – 9 storeys (37.93m AOD)
	Block 12 – 6-7 storeys (31.33m AOD)	Block 12 – 7-8 storeys (34.63m AOD)
	Block 13 – 4-6 storeys (up to 29m AOD)	Block 13 – 4-6 storeys (up to 29m AOD). No change.
	Block 14 – 4-5 storeys (up to 25m AOD)	Block 14 – 4-6 storeys (up to 29m AOD)
	Block 15 – 5-6 storeys (up to 29m AOD)	Block 15 – 8 storeys (up to 37m AOD)
	Block 16 – 5-6 storeys (up to 29m AOD)	Block 16 – 6-8 storeys (up to 37 AOD)

¹ Note that the heights quoted for the detailed Buildings (Block 1 – 12) differ slightly from those figures presented in the LBRuT Planning Committee Report for meeting on 29 January 2020; this is due to (a) rounding; (b) turret elements being lowered before Committee which have not been reflected in the heights presented (Blocks 2, 7 and 8)

² The heights quoted for the outline Buildings (Block 13 – 22) are as per the current and revised plans – the heights have been taken here as height from sea level rather than from ground level, as shown on the submitted parameter plans

	Block 17 – 5-7 storeys (up to 32m AOD)	Block 17 – 6-8 storeys (up to 37m AOD)
	Block 18 ³ – 4-6 storeys (up to 29m AOD), with the west elevation (fronting Williams Lane) to be no more than 21m AOD with any additional height to be no less than 2m from the elevation, unless otherwise agreed with the LPA ⁴	Block 18 – 3-7 storeys (up to 33m AOD)
	Block 19 – 4 storeys (up to 22m AOD), with the north west flank (fronting Williams Lane) to be no more than 21m AOD with any additional height to be no less than 2.5m from the elevation, unless otherwise agreed with the LPA ⁵	Block 19 – 4 storeys (up to 23m AOD)
	Block 20 – 3 storeys (up to 19m AOD), with the north elevation (facing Thames Bank) to be no more than 16.7m AOD with any additional height to be agreed with the LPA ⁶	Block 20 – 4 storeys (up to 23m AOD)
	Block 21 – 3 storeys (up to 19m AOD), with the north elevation (facing Thames Bank) to be no more than 16.7m AOD with any additional height to be agreed with the LPA ⁷	Block 21 – 4 storeys (up to 23m AOD)
	No Block 22 in Original Scheme	Block 22 – 4 storeys (up to 21m AOD)
b	Façade and elevational treatments	Façade and elevational amendments in connection with the amendments to heights as set out above
c	Blocks 18 and 19 – laid out with two gaps between blocks (to north west and north east of Block 18)	Blocks 18 and 19 – layout amended so two gaps are now north east (as existing) and south
d	Blocks 20 and 21 provided as two three storey townhouse terraces, providing 16 and 8 units respectively (24 private units in total)	Block 20 split into two blocks providing accommodation in 4 storey buildings

³ For Blocks 18, 19, 20 and 21, the elevational heights quoted are as per draft condition NS88 (part C) as set out in the LBRuT Planning Committee Report (January 2019) and associated addendum. The figures quoted in the condition do not match what is set out above as the condition figures are taken from a base from ground level, rather than from sea level. The actual height of the buildings quoted above is consistent with the draft condition.

⁴ Heights as above to be controlled via Design Code and draft condition (note that figures quoted above are measured from sea level, not ground level)

⁵ As above

⁶ As above

⁷ As above

		Block 21 remains as three storey townhouses, but providing 7 residential units rather than 8 in the Original Scheme
e	Block 1 (Cinema)	Block 1 (Cinema) – materials and façade design amended to incorporate the office space above the cinema. Basement level added.
f	Minor footprint changes	Minor footprint changes to blocks 2, 3, 7, 8, 11 and 12 as a consequence of aesthetic refinements
g	Internal layouts	Layout changes to residential provision to accommodate change in residential mix and provision; minor amendment to ground floor layout of Block 4; the community space intended for the ground floor of Block 4 has moved to Block 5
h	Landscaping	Layout changes around Block 20 and Block 21 to suit the new residential typology with additional amenity and public open space Minor changes to suit revised location for building entrances were necessary Revised external finishes and ramp layout around Block 5
i	Trees	Additional no. 3 trees are proposed at the building frontage of Block 20 and Block 21, pruning works required to 4 existing trees in north west corner of the Site
j	7,149 sqm playspace (with school); 4,084 sqm playspace (without school)	10,667 sqm playspace (with school); 7,408 sqm playspace (without school)
3	<i>Transport, including Chalkers Corner</i>	
a	Basement on east side of Ship Lane comprising 408 car parking spaces (331 residential, 77 commercial) plant and cycle parking	Since the original application the east basement has reduced very slightly as B10 no longer requires residential access to the basement. This does not change the number of car parking spaces, albeit there are now 330 residential and 78 commercial (total remains at 408)
b	Basement on west side of Ship Lane comprising 256 car parking spaces, plant and cycle parking	Basement extent reduced to provide 70 car parking spaces alongside plant, and cycle parking (reduction in 186 spaces overall)

c	Provision of 15 car parking spaces at grade for the school	No change
d	20% of car parking spaces to be provided with active electric charging provision, and 100% provided with passive electric charging provision	No change to this approach
e	Provision of 1,754 long stay and 197 short stay cycle parking spaces across the Site	Provision of 2,582 long stay and 302 short stay cycle parking spaces across the Site
f	Highways mitigation at Chalkers Corner comprising reconfiguration of junction and works to existing landscaped area at Chertsey Court	In addition to the submitted scheme alternative options being explored to Chalkers Corner and elsewhere in order to mitigate highways impacts
g	School access roads and pedestrian routes	Minor amendments to school access roads and pedestrian routes

Appendix 3 – Substitution Submission Documents

Document	Form of Document ⁸	Prepared By
Application A		
Proposed plan, section and elevation drawings	Revised where necessary (see separate plan and document schedule)	Squire & Partners / Gillespies / Stantec
Proposed parameter plan, section and elevation drawings	Revised where necessary (see separate plan and document schedule)	Squire & Partners
Accommodation Schedules (Schedules of GIA, GEA, NSA and Mix Summary)	Revised to replace Accommodation Schedule, dated 19 March 2019.	Squire & Partners
Affordable Housing Statement	Addendum; to be read in conjunction with February 2018 Affordable Housing Statement.	Gerald Eve LLP
Arboricultural Report	Revised to replace Arboricultural Report, dated April 2019.	Waterman
CIL Form and CIL Form note (Application A only); CIL Forms for Applications B and C remain as per original submission	Revised to replace CIL Form and CIL form note, dated 19 February 2018.	Gerald Eve LLP
Community Uses and Cultural Strategy	Revised to replace Community Uses and Cultural Strategy, dated February 2018.	Hatch Regeneris
Design and Access Statement Addendum	Addendum; to be read in conjunction with the February 2018 Design and Access Statement (detailed) and Design and Access Statement Addendum, dated March 2019.	Squire & Partners
Design Code	Revised to replace the earlier versions of the Design Code.	Squire & Partners
Drainage Strategy	Revised to replace Drainage Strategy, dated February 2018.	Waterman
Employment Assessment Addendum	Addendum, to be read in conjunction with February 2018 Employment Assessment	Hatch Regeneris
Energy Strategy	Revised to replace Energy Strategy, dated February 2018 and Energy Strategy Addendum, dated June 2019.	Hoare Lea
Environmental Statement Addendum (including Appendices)	Addendum to be read in conjunction with the 2018 Environment Statement and May 2019 Environment Statement Addendum	Waterman
Financial Viability Assessment Report	Addendum to be read in conjunction with the Financial Viability Assessment, dated	BNP Paribas

⁸ The original documents set out in this table are as submitted to LBRuT as part of the original submissions (18/0547/FUL, 18/0548/FUL and 18/0549/FUL)

	February 2018 and FVA Addendums dated March 2019 and June 2019.	
Fire Statement	Additional Report not previously provided to LBRuT.	Hoare Lea
Framework Construction Management Plan	Revised to replace Framework Construction Management Plan, dated February 2018 and updated Appendix 6.1, dated December 2019.	Aecom
Framework Servicing and Delivery Management Plan	Revised to replace Framework Servicing and Delivery Management Plan, dated February 2018.	Stantec
Health Impact Assessment	Revised to replace Health Impact Assessment, dated February 2018.	Hatch Regeneris
Internal Daylight and Sunlight Assessment	Revised, to be replace Internal Daylight and Sunlight Report, dated February 2018 (updated 29 April 2019).	Eb7
Landscape and Public Realm Strategy Design and Access Statement	Revised to replace Landscape DAS Revision 07 (Application A) submitted to LBRuT in December 2019.	Gillespies
Noise Impact Assessment	Revised to replace Noise Impact Assessment, dated March 2018.	Hoare Lea
Operational Waste Management Plan	Revised to replace Operational Waste Management Strategy, dated February 2018.	Stantec
Open Spaces and Playing Pitches Assessment	Addendum; to be read in conjunction with OSSPA, dated May 2019.	Gerald Eve LLP
Outline Car Park Management Plan	Revised to replace Outline Car Park Management Plan, dated February 2018.	Stantec
Retail and Leisure Statement	Addendum; to be read in conjunction with Retail and Leisure Statement (February 2018 – Revised 27th September 2019) =	RPS
Structural Impact Assessment	Revised to replace Structural Impact Assessment, dated February 2018.	Waterman Structures
Sustainability Statement	Revised to replace Sustainability Statement, dated February 2018.	Hoare Lea
Further Addendum Town Planning Statement	Addendum to be read in conjunction with May 2019 Addendum Planning Statement and the February 2018 Planning Statement.	Gerald Eve LLP
Further Transport Assessment Addendum	Addendum; to be read alongside the Transport Assessment (February 2018) and Transport Assessment Addendum (May 2019).	Stantec
Framework Travel Plan	Revised to replace the Framework Travel Plan, dated May 2019.	Stantec
Residential Travel Plan	Revised to replace the Framework Travel Plan, dated May 2019.	Stantec

Application B – Substitution Documents as per Application A, plus:		
Proposed plan, section and elevation drawings	Revised where necessary (see separate plan and document schedule)	Squire & Partners / Gillespies / Stantec
School Travel Plan	Revised to replace the School Travel Plan, dated May 2019.	Stantec
Landscape and Public Realm Strategy	Revised to replace Landscape DAS Revision 10 (Application B) submitted to LBRuT in December 2019.	Gillespies
Application C – All Substitution Documents as per Applications A and B above		