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14 September 2022

FAO: Lucy Thatcher

Our ref: NTH/AKG/SOTH/J7699

Your ref: 22/0900/OUT and 22/0902/FUL

Dear Lucy

Former Stag Brewery, Lower Richmond Road, Mortlake, London
Substitutions to Planning Application refs: 22/0900/OUT (Application A) and 22/0902/FUL (Application B)

On behalf of our client, Reselton Properties Limited, we write to respond to matters raised in statutory consultation responses in respect of the pending planning applications refs: 22/0900/OUT ('Application A') and 22/0902/FUL ('Application B') at the Former Stag Brewery, Lower Richmond Road, Mortlake, London ('the Site').

The statutory consultation responses are provided in the following documents:

Applications A and B

1. LBRuT Internal Consultees, dated 27 May 2022;
2. Accelar – Energy and Sustainability comments on behalf of LBRuT, received May 2022; and
3. Greater London Authority ('GLA') Stage 1 Report, dated 20 June 2022 (ref: GLA/2022/0288/S1/01).

Application A only

1. Health and Safety Executive, dated 27 May 2022 (ref: pgo-1164).

The responses comprise matters which have resulted in amendments to the application which are supported by updated plans and documents for formal substitution. These are attached at Appendices 5 and 6.

In addition, this pack contains response tables at Appendices 2, 3 and 4 where matters raised by statutory consultees simply requires clarification.

Background

Two applications for planning permission were submitted to the London Borough of Richmond upon Thames ('LBRuT') on 11 March 2022 for the masterplan redevelopment of the Site and are currently pending determination. Consultation with statutory and public consultees has been ongoing throughout this period.

Matters for Substitution

The documents submitted for substitution represent amendments which are considered appropriate to respond to comments raised by statutory consultees during the consultation period of the two pending planning applications.

In summary the proposed changes to the scheme relate to Application A only and comprise:

- i. Cinema height reduced and top floor set back;
- ii. Design alterations to cinema and office entrances at Building 1;
- iii. Building 10 reduced by a storey and associated loss of 9 intermediate residential units;
- iv. Total reduction of 14 units (9 in Building 10 and 5 in Development Area 2);
- v. Loss of 79 sqm GIA of office floorspace;
- vi. Total loss of 55 sqm of flexible use floorspace and loss of 90sqm of flexible use space in the High Street Zone;
- vii. Lighting strategy amended;
- viii. Revised drainage strategy;
- ix. Amended fire strategy;
- x. Amended refuse strategy;
- xi. Landscaping updates; and
- xii. Updated wheelchair accessible unit layouts.

A schedule of the physical changes made to Application A is set out in paragraph 1.3 of the Design and Access (DAS) Statement Addendum, prepared by Squire & Partners and page 3 of the Environmental Statement (ES) Statement of Conformity, prepared by Waterman IE.

Certain elements of both Applications A and B have also been re-assessed against updated guidance published following the submission date of the applications (11 March 2022). Hoare Lea have reviewed the Whole Life Carbon Assessment and the Circular Economy Statement in light of the updated GLA draft guidance. In addition, although not a matter raised by LBRuT, the BRE Guidelines were updated in June 2022. EB7 have reviewed the scheme and have provided a supplementary Internal Daylight and Sunlight Report, dated 28 July 2022, for completeness. The assessment does not alter the conclusions set out in paragraph 18.56 of the Town Planning Statement, dated March 2022.

Substitution Documents

The documents submitted for formal substitution or as addendum documents to those previously submitted in March 2022 are:

Application A (ref. 22/0900/OUT)

- a) Updated Unit Mix Accommodation Schedule (Rev J), prepared by Squire & Partners (to replace Unit Mix Accommodation Schedule that was submitted March 2022);
- b) Updated Community Infrastructure Levy ('CIL') form, prepared by Gerald Eve LLP (to replace CIL form that was submitted March 2022);
- c) Updated Drawing Schedule, prepared by Squire & Partners (to replace Drawing Schedule that was submitted March 2022);
- d) Updated Housing Standards Compliance Schedule, prepared by Squire & Partners (to replace Housing Standards Compliance Schedule submitted March 2022);
- e) Revised Proposed Plans, Sections and Elevations, prepared by Squire & Partners (to replace those relevant drawings submitted in March 2022);

- f) Playspace Plan (ref: P10736-00-003-GIL-0800), prepared by Gillespies LLP;
- g) Updated Design Code, prepared by Squire & Partners (to replace the Design Code submitted in March 2022);
- h) Revised High Street Zone Plan and a bubbled version for ease of review, prepared by Squire & Partners (to replace that previously submitted under Appendix A of the Town Planning Statement in March 2022);
- i) Additional Lighting Layout Plans, prepared by Michael Grubb Studio (to be read in conjunction with the Lighting Strategy submitted in March 2022);
- j) Updated Waterfront Lighting Assessment, prepared by Michael Grubb Studio (to replace that submitted after March 2022 submission);
- k) Design and Access Statement Addendum, prepared by Squire & Partners, dated July 2022 (to be read alongside the March 2022 submitted Design and Access Statement);
- l) Retail and Leisure Statement Addendum, prepared by RPS, dated July 2022 (to be read alongside the March 2022 submitted Retail and Leisure Statement);
- m) 'Impact of reduction in basement on scheme viability' note, prepared by BNP Paribas Real Estate (to be read independently from submitted pack in March 2022);
- n) New Boathouse Email, prepared by Dartmouth Capital (to be read independently from submitted pack in March 2022);
- o) Additional Update of Rail Impact Assessment for Mortlake Station, prepared by Stantec (to be read independently from submitted pack in March 2022);
- aa) Community and Cultural Facilities Assessment Addendum, prepared by Hatch (to be read in conjunction with that submitted in March 2022);
- bb) Employment Assessment Addendum, prepared by Hatch (to be read in conjunction with that submitted in March 2022).

Application B (ref: 22/0902/FUL)

- a) New School Overheating Analysis, prepared by Hoare Lea (to be read independently from submitted pack in March 2022); and
- b) New 'Indicative Green Wall Location' elevations of the school (ref: C645_Z3_E_AL_002), prepared by Squire & Partners (to be read independently from submitted pack in March 2022).

Both Application A and B

- a) Updated Application Forms for both Application's A and B, prepared by Gerald Eve LLP (to replace Application Form's that were submitted March 2022);
- b) New CAVAT Value Note, prepared by Waterman IE (to be read independently from submitted pack in March 2022);
- c) Updated Fire Statement, prepared by Hoare Lea (to replace Fire Statement submitted in March 2022);
- d) Updated Gateway 1 form, prepared by Hoare Lea (to replace Gateway 1 form submitted in March 2022);
- e) Additional Internal Daylight and Sunlight Statement, prepared by EB7 (to be read in conjunction with the Internal Daylight and Sunlight submitted in March 2022);
- f) Updated Floor Area Schedule's (GIA, NSA, and GEA (Rev J)), prepared by Squire & Partners (to replace the Floor Area Schedule's (Rev I) that were submitted in March 2022);
- g) Updated Facts and Figures Appendix D from the Town Planning Statement, prepared by Gerald Eve LLP (to replace Appendix D Facts and Figures Appendix in Planning Statement submitted in March 2022);
- h) Updated Drainage Strategy, including SUDS proforma, and Appendices A- K, prepared by Waterman IE (to replace submitted Drainage Strategy in March 2022);

- i) Updated Highways Plans, prepared by Stantec (to replace relevant Highway Plans submitted in March 2022);
- j) Supplementary Protected Species Report, prepared by Waterman IE, dated September 2022 (to be read in conjunction with the Environmental Statement submitted in March 2022);
- k) Updated Landscape Drawings, prepared by Gillespies (to replace the relevant Landscape Drawings submitted in March 2022);
- l) Updated Landscape Drawing Schedule, prepared by Gillespies (to replace submitted Landscape Drawing Schedule submitted in March 2022);
- m) Updated Operational Waste Management Plan, prepared by Stantec (to replace Operational Waste Management Plan submitted March 2022);
- n) Updated Whole Life Carbon, prepared by Hoare Lea (to replace Whole Life Carbon submitted in March 2022);
- o) Updated Circular Economy Statement, prepared by Hoare Lea (to replace the Circular Economy Statement submitted in March 2022);
- p) Updated Appendix F- BRUKL Be Green calculations, prepared by Waterman IE (to replace the Appendix F- BRUKL Be Green calculations submitted in March 2022);
- q) Updated Appendix F- BRUKL Be Lean calculations, prepared by Waterman IE (to replace the Appendix F- BRUKL Be Lean calculations submitted in March 2022);
- r) Updated Appendix F- SAP Be Green calculations, prepared by Waterman IE (to replace the Appendix F- SAP Be Green calculations submitted in March 2022);
- s) Updated Appendix F- SAP Be Lean calculations, prepared by Waterman IE (to replace the Appendix F- SAP Be Lean calculations submitted in March 2022);
- t) GLA Carbon Emissions Supporting Sheet, prepared by Hoare Lea (to replace the GLA Carbon Emissions Supporting Sheet submitted in March 2022);
- u) Revised Arboricultural Impact Assessment, prepared by Waterman IE (to replace that submitted in March 2022);
- v) New Environmental Statement Letter of Conformity with the below Annex's, prepared by Waterman IE (to be read in conjunction with the Environmental Statement submitted in March 2022);
 - a. Annex 1: Review of the Amendments in relation to the Environmental Impact Assessment;
 - b. Annex 2: Air Quality Assessment;
 - c. Annex 3: Updated AVRs;
 - d. Annex 4: Updated Illustrative Masterplan Ground Floor Level;
- w) New Appendix 12.5, Revised River Wall Note, prepared by Waterman IE (to be read in conjunction with the pack submitted in March 2022);
- x) Health Impact Assessment Statement of Conformity, prepared by Hatch (to be read in conjunction with the Health Impact Assessment submitted in March 2022);
- y) Landscape Design and Access Statement Addendum, prepared by Gillespies LLP (to be read in conjunction with the Landscape Design and Access Statement submitted in March 2022);
- z) Financial Viability Assessment Addendum, prepared by BNP Paribas Real Estate (to be read in conjunction with the submitted Financial Viability Assessment in March 2022) [to follow];
- aa) Replacement Sustainable Construction Checklist, prepared by Hoare Lea (to replace that submitted in March 2022 submission);
- bb) Transport Assessment Addendum, prepared by Stantec (to be read in conjunction with the Transport Assessment submitted in March 2022);
- cc) New Assessment of Rail Impacts, prepared by Stantec (to be read in conjunction with the Transport Assessment submitted in March 2022);
- dd) New Assessment of Bus Stops, prepared by Stantec (to be read in conjunction with the Transport Assessment submitted in March 2022);
- ee) New Bespoke PTAL Technical Note, prepared by Stantec (to be read in conjunction with the Transport Assessment submitted in March 2022);

- ff) New Traffic Data Comparison, prepared by Stantec (to be read in conjunction with the Transport Assessment submitted in March 2022);
- p) Interim QDR Report, prepared by Hoare Lea (to be read in conjunction with Fire Statement and Gateway 1 report submitted in March 2022);
- q) Basement Screening Assessment, prepared by Waterman IE (new document);
- r) Updated Ecology ES Chapter and figures (13.1-13.10) and associated Statement of Conformity, all prepared by Waterman IE, dated September 2022 (to replace that submitted in March 2022 submission); and
- gg) This Covering Letter, prepared by Gerald Eve LLP.

Consultee Response Trackers (including matters for clarification)

The following trackers have been prepared to summarise the issues raised by statutory consultees, identify how these have been responded to and direct the review to the relevant documents. The trackers have been merged into a single document for submission.

Application A only:

- Responses to the HSE Substantive Response for Stag Brewery, prepared by Hoare Lea (Appendix 2(11) and Appendix 3(P));
- Design Code Comments Tracker, prepared by Squire & Partners (Appendix 2(9) and Appendix 3D); and
- Townscape Briefing Note, prepared by Montagu Evans, dated 9 August 2022 (Appendix 2(13), 3B and Appendix 4B).

Application A and B:

- Accelar energy response tables, prepared by Hoare Lea (Appendix 2(5), 2(6), 6a and 6b);
- Combined LBRuT and HSE response tracker (Appendix 2(3) and 3);
- GLA Stage 1 Response tracker (Appendix 2(4) and 4); and
- Noise Conditions Response Note, prepared by Waterman IE (Appendix 2(12) and 3(I));
- Drainage Response note, prepared by Waterman IE (Appendix 2(10) and 3(N)).

General Summary of Response

In terms of planning matters to consider as a result of the amendments made following the consultation exercise, the key areas of review are:

1. Land use;
2. Design and Landscape;
3. Fire Safety;
4. Refuse Strategy;
5. Transport;
6. Energy and Sustainability;
7. Environmental Statement Matters;
8. Townscape; and
9. Viability.

1. Land Use

Non-residential land uses

Table 1 summarises the key changes to the land use areas. Areas not quoted in the table remain as per the March 2022 submission and no changes have been made to the maximum and minimum flexible use floorspace caps set out in Table 4 of the submitted Town Planning Statement. A revised full floor area schedule has been provided by Squire & Partners (dated 13 July 2022, Rev J):

Land Use	March 2022 Submission (GIA sqm)	July 2022 Substitutions (GIA sqm)	Change (+/-)
Flexible Uses	4,839	4,784	-55
Office (Class E)	4,547	4,468	-79

Table 1: Land Use area changes as a result of the July 2022 substitutions. Areas based on Squire & Partners area schedule, dated 13 July 2022 (Rev J).

The revised areas set out in Table 1 are considered to continue to meet the planning policy objectives of the site in terms of creating a new village heart for Mortlake and employment opportunities, in line with Local Plan Policies LP25 and the Site Allocation SA24.

RPS have reviewed their Retail and Leisure Statement (RLS) and provided an addendum. Paragraph 13 of the addendum confirms that the changes to flexible use floorspace now proposed and the reduced number of residential units are negligible and would not cause any significant adverse effects upon any town centre. Furthermore, there would be no issue in terms of the sequential test given the appropriateness of the scale of the proposed flexible use floorspace. Paragraph 14 of the Addendum goes on to confirm that the conclusions reached in Section 7 and 8 of the submitted RLS remain robust.

Hatch have reviewed the proposed reduction in floor areas and have concluded in the following documents that the changes are minor and do not change the conclusions presented in the March 2022 submissions: i) Employment Assessment and ii) Cultural and Community Facilities Assessment. Therefore, the findings presented in March 2022 remain valid and robust.

As a result, the assessment put forward in Section 10 of the submitted Town Planning Statement, prepared by Gerald Eve LLP, dated March 2022 remains robust and valid.

Residential use

In terms of residential unit numbers and tenure mix, Table 2 sets out the changes made:

March 2022 Submission						July 2022 Substitutions							
Housing Tenure						Housing Tenure							
Unit Size	Potential London Affordable Rent		Potential London Shared Ownership		Private Market		Unit Size	Potential London Affordable Rent		Potential London Shared Ownership		Private Market	
Studio	0	0	0	0	48	6%	Studio	0	0	0	0	45	5%
1 bed	12	7%	27	56%	243	28%	1 bed	12	7%	22	56%	241	28%
2 bed	63	38%	21	44%	396	45%	2 bed	63	38%	17	44%	396	46%
3 bed	84	51%	0	0	165	19%	3 bed	84	51%	0	0	165	19%
4 bed	6	4%	0	0	20	2%	4 bed	6	4%	0	0	20	2%
Total	165		48		872		Total	165		39		867	

*some % figures rounded up

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Table 2: Summary of the originally proposed and the revised residential unit numbers and tenure mix

It is considered that this minimal reduction in residential units proposed would not alter the conclusions presented in Section 10 of the Town Planning Statement, prepared by Gerald Eve LLP, dated March 2022. The masterplan will continue to deliver a significant amount of new housing across the Site, in line with LBRuT and GLA policy aspirations. The residential provision within the Proposed Development would represent a significant provision of housing in the plan period (up to 1,071 out of 4,110 homes) for LBRuT in the next ten-year period. This equates to a contribution up to 26.06% (previously 26.4% in March 2022) of the LBRuT's target and would account for between two and three years of the annual delivery targets that the LBRuT have set for Barnes and Mortlake under Local Plan Policy LP 34.

The minimal reduction in residential units proposed is therefore considered acceptable.

2. Design and Landscape

Squire & Partners have provided an Addendum to the Design and Access Statement (DAS), dated July 2022 which addresses the design revisions made to the proposals. Gillespies LLP have also provided a Landscape DAS Addendum, dated July 2022, which addresses the areas of change resulting from the proposed modifications to the scheme.

The proposed modifications to the design of the Proposed Development do not change the conclusions reached in sections 12, 13 and 14 of the submitted Town Planning Statement, prepared by Gerald Eve LLP.

3. Fire Safety

In response to the HSE comments, dated 27 May 2022, Hoare Lea have led a thorough design review of the proposed scheme submitted under Application A.

Hoare Lea have prepared a HSE response table, dated 27 July 2022, which clearly sets out how each of the HSE's comments have been responded to. The key changes in respect of responding to HSE comments are:

- i. All refuse stores have been moved to ground floor level; and
- ii. Lift cores and stairwells direct to the basement have been removed/separated.

The Fire Statement and Gateway One form have also been updated to assess the revised design.

It is considered that the Updated Fire Strategy complies with London Plan Policy D12.

4. Refuse Strategy

The refuse strategy has been revised due to:

1. Responding to the HSE consultation comments; and
2. Reflecting the change in commercial floor areas and a reduction of 14 residential units.

As a result of consultation comments from the HSE all refuse storage at the basement level has been removed from Application A. Refuse can be accessed from the outside only.

Stantec have revised their Operational Waste Management Plan (OWMP) (Rev E, July 2022) accordingly and the revised OWMP has been submitted in support of these proposed scheme amendments.

5. Transport

In response to the detailed consultation comments received from LBRuT and TfL, Stantec have undertaken additional reviews and analyses of the proposed development.

The following technical notes have been prepared and submitted:

- TN045 - Assessment of Rail Impacts - Rev A
- TN046 - Assessment of bus stops - Rev A
- TN047 - Stag Brewery PTAL Technical Note - Rev A
- TN048 - Traffic Data Comparison
- TN049 - TA Addendum

6. Energy and Sustainability

In response to comments received from Accelar (the LBRuT's advisors) and to address updated draft GLA guidance, the following information has been reviewed and resubmitted by Hoare Lea:

- i. School overheating analysis;
- ii. GLA energy reporting tool;
- iii. BRUKL & SAP worksheet appendices.
- iv. Updated Circular Economy Statement; and
- v. Whole Life Carbon reporting sheet.

7. Environmental Statement Matters

The March 2022 ES has been reviewed considering the proposed amendments to the Development and an ES Statement of Conformity has been prepared by Waterman IE, dated 4 August 2022 and is submitted now in support of the amendments. Based on the review and following further assessment, Waterman IE have concluded that the findings of the Environmental Impact Assessment presented in the March 2022 ES in support of both the outline planning application (22/0900/OUT) and the detailed application for the school (22/0902/FUL) are unchanged when the proposed modifications to the scheme have been considered.

8. Townscape

Montagu Evans (ME) have reviewed the townscape comments received from LBRuT, considering the physical changes set out in the DAS Addendum and ES Statement of Conformity (see note dated 9 August 2022).

In terms of the assessment of London Plan Policy D9 within the submitted Town Planning Statement, it is considered that the assessment remains robust.

9. Viability

A number of the matters raised within the consultation responses have led to scheme changes which will affect the financial viability review of the scheme, such as increasing construction costs, the loss of residential units across the scheme and the inclusion of unanticipated s106 costs. These are being reviewed and will be factored into an updated Financial Viability Assessment for review and discussion with LBRuT officers and their advisors.

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 Anna Gargan of this office should you have any questions.

Yours sincerely



Gerald Eve LLP

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Appendices:

Appendix No.	Name
1	Updated Facts and Figures Table, prepared by Gerald Eve LLP (to replace Appendix D Facts and Figures Appendix in Planning Statement submitted in March 2022).
2	Merged Consultation Response Tracker Document, including: <ol style="list-style-type: none"> 1. Contents Page 2. This Cover Letter, prepared by Gerald Eve LLP; 3. London Borough of Richmond upon Thames Response Tracker, prepared by the Applicant, dated 18th August 2022; 4. GLA Stage 1 Response Tracker, prepared by the Applicant, dated 18th August 2022; 5. Accelar Response Tracker for Application ref. 220900OUT, prepared by Hoare Lea, dated 12th August 2022; 6. Accelar Response Tracker for Application ref. 220902FUL, prepared by Hoare Lea, dated 18th August 2022; 7. Air Quality Response Tracker, prepared by Waterman IE, dated August 2022; 8. Arboriculture Response Tracker, prepared by Waterman IE, dated 27th July 2022; 9. Design Code Comments, prepared by Squire & Partners, dated 29th August 2022; 10. Flood Risk and Drainage Response Tracker, prepared by Waterman IE, dated August 2022; 11. HSE Response Tracker, prepared by Hoare Lea, dated 14 September 2022; 12. Response to Consultee Comments on Noise, prepared by Waterman IE, dated 29th July 2022; 13. Townscape Response Tracker, prepared by Montagu Evans, dated 9th August 2022; 14. Affordable Housing Responses, prepared by BNP Paribas, dated 22nd July 2022; and 15. Impact of Reduction in Basement on Scheme Viability, prepared by BNP Paribas, dated 22nd July 2022.
3	LBRuT Response Tracker, dated 18 August 2022, with associated Appendices as follows: <ol style="list-style-type: none"> A. Excel Spreadsheet, prepared by BNP Paribas, dated 13 June 2022 (issued to LBRuT on 13 June 2022).

	<ul style="list-style-type: none"> B. Townscape Briefing Note, prepared by Montagu Evans, dated 9 August 2022. C. RHP Letter, dated 15 June 2022 (issued to LBRuT on 16 June 2022). D. 'Consultees Responses' note, prepared by BNP Paribas, dated 28 July 2022. E. 'Briefing Note – Response to Consultee Comments on Arboriculture' (ref: WIE18671-114-BN-3.3.2-Arboriculture Response), dated 27 July 2022. F. Air Quality Response Note, prepared by Waterman IE, dated June 2022 (issued to LBRuT on 29 June 2022). G. Annex 2: Air Quality Assessment Update of the ES Letter of Conformity, prepared by Waterman IE. H. Air Quality Responses, prepared by Waterman IE, dated August 2022. I. 'Briefing Note –Response to Consultee Comments on Noise', prepared by Waterman IE, dated 23 June 2022 (issued to LBRuT on 29 June 2022). J. Indicative school green wall elevation, prepared by Squire & Partners, ref: C645_Z3_E_AL_002. K. TN045 - Assessment of Rail Impacts - Rev A, dated 27 June 2022, prepared by Stantec. L. TN047 - Stag Brewery PTAL Technical Note - Rev A, dated 1 July 2022, prepared by Stantec. M. TN048 - Traffic Data Comparison, dated July 2022, prepared by Stantec. N. Drainage Response Note, prepared by Waterman IE, dated August 2022. O. Email from Fulham Reach Boat Club, dated 17 June 2022. P. HSE Response Note, dated 27 July 2022, prepared by Hoare Lea.
4	<p>GLA Stage 1 Response Tracker, dated 18 August 2022, with associated Appendices as follows:</p> <ul style="list-style-type: none"> A. 'Impact of reduction in basement on scheme viability', prepared by BNP Paribas, dated 28 July 2022. B. Townscape Briefing Note, prepared by Montagu Evans, dated 9 August 2022. C. Concept design for Clifford Avenue crossing, prepared by Stantec, drawing ref: 38262-5520-29. D. 'Traffic Data Comparison' (TN048), prepared by Stantec. E. 'Assessment of Bus Stops' (TN046), prepared by Stantec.
5	Design Code Comments tracker, prepared by Squire & Partners.
6	<p>Accelar Response Trackers</p> <ul style="list-style-type: none"> a. Application A response tracker, prepared by Hoare Lea, dated 9 August 2022. b. Application B response tracker, prepared by Hoare Lea, dated 18 August 2022.
7	Substitution Documents, as listed in this covering letter.
8	Substitution Drawings, as set out in the drawing schedules provided by Squire & Partners, Gillespies LLP and Michael Grubb Studio.