

Chapter 8 Affordable Housing

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We urge the Council to rigorously scrutinise this statement in line with their own policies and recent policy and guidance from the Mayor's Office.

Housing Need in LBRuT

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high costs for market housing for sale and rent, a high need for affordable housing is shown – 964 households per annum. This level of need is assessed on an unconstrained basis.

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Chapter 9 - Community Space and NHS Facilities

The proposed design of the Maltings (building 4) suits neither the developers nor the community. The siting of the lifts and stairs in the core of the building, rather than at the edge, and space devoted to rubbish, means that only 65% of the floor space is useable for accommodation or community use. The proposed configuration reduces the flexibility of use for this space.

Background

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Maltings - Proposed plans April 2018

There is no evidence that anyone has incorporated the MCA and MBCG proposals submitted in October 2017. The only change is that the smaller room on the ground floor has lost some space to rubbish. The first floor has space for flexible use, but it is difficult to know how it could be used. This building has the potential to provide an excellent community space on the ground floor and spacious flats on each of the floors above. The plans suggested by the MCA/MBCG achieve this, these plans do not.

- The MCA/MBCG plans increased the available floor space by over 20%, better for community use and the flats.
- The two (in)flexible spaces on the ground floor are linked by a corridor on the river frontage thus wasting the potential of this riverside setting. People using a community centre would appreciate being able to see and enjoy a view of the river, why ignore it?
- The requirements of a community centre are for interconnecting rooms which are independently accessible. The present arrangement of two rooms, each with only one door, is inflexible and impractical.
- The shape of the rooms makes them hard to divide logically. The larger room is either two long thin rooms or four very small ones. The smaller room, with a section taken over by rubbish storage is equally inflexible.
- The majority of community activities include tea and biscuits. There is no small kitchen.
- There is no office space. No centre can run without administrative support.
- A key attraction of a community centre would be a café with a view of the river for both users of the centre and passers-by. A first-floor corridor accessible only by stairs with no space for catering does not provide this.

An enduring community space needs to be financially independent; It would be difficult to generate the requisite annual income from this inflexible design. In addition, it would make it extremely hard to raise the funds to fit it out, why would anyone want to invest in a building that was not of real benefit and use to the community it serves?

Many users of the Community Centre will be of poor or limited mobility, the model shows a ramp to the flat entrance but not to the general entrance.

The MCA and MBCG call on the Planning Committee to reject the plans for Building 4 as being unsuitable for a Community Centre and support the revisions originally proposed by the MCA and MBCG.

Health Facilities

The development will bring a 40% increase in local residents and one thing we should all expect to see are NHS GP and primary care facilities on the site.

It is positive to see that the plans include a Residential Care Home and a supported housing facility. However, the care provided in both will be largely private, will not include any NHS care and will be specifically for the people who live in these two places. Furthermore, many of the residents in the care home and housing facilities will have higher than usual needs for NHS primary and community care.

- WHERE ARE THE ADDITIONAL NHS SERVICES?: lack of any NHS facility could be a major concern; the developer recently suggested the minimal four clinical rooms may be dropped owing to lack of interest from local GPs - this is not acceptable
- EXISTING SERVICES BARELY COPING: Unless plans for additional services are made clear, current local residents will therefore have to wait even longer to get a GP appointment.
- EXTRA JOURNEYS TO GP, to OUTPATIENTS AND HOSPITAL lack of any additional facilities will only add to journeys, many of which will be by car (or by ambulance for the residents of the care home and the supported housing).
- NOT DOWN TO THE DEVELOPER ALONE the Richmond Clinical Commissioning Group has an important role to play but we should press Richmond Local Authority, through the planning process, to explain what the plans are for the much needed increase in NHS primary and community care services to match the needs of the additional population.

We urge the planning committee to ensure that adequate NHS facilities are provided with this site.

Chapter 10 - Environmental Impact Assessment

Stag Brewery Environmental Statement – Summary

- Alternatives – no assessment of off-site (as distinct from on-site) locations for the proposed secondary school (because clearly not within the brief); more rigorous assessment needed of the alternative method of transportation of all demolition waste, excavated soil and construction materials via the river instead of the road (this cannot be dismissed in a few sentences).
- Socio-economics – no assessment of the benefits of affordable housing, nor of the proposed school being as large as 6-form entry plus 6th form.
- Transport – more rigorous assessment needed of the proposed reconfiguration of Chalkers Corner which is likely to attract latent demand and very soon become gridlocked as at present; also of the school traffic; and of the potential for club car use as an alternative to car ownership.
- Noise – no assessment made of the benefits to residents of Lower Mortlake Road if transportation of waste and construction materials were made by river rather than by road.
- Air quality – no assessment of other toxic gases, vis. benzene, carbon monoxide, lead, ozone and sulphur dioxide in accordance with EC Directives; no rigorous account of the assumptions made about the potential decrease in pollutants resulting from any increase in electric vehicle use; no indication of how long it would take for new planting at Chalkers Corner to become effective as an absorber of air pollution.
- Ecology – no assessment of the loss of the grass playing fields as a food resource for birds.
- Visual – no assessment of the impact of the proposed reconfiguration at Chalkers Corner.
- Daylight/sunlight, etc – insufficient consideration of the overshadowing of the river, towpath and open riverside spaces caused by the proposed housing blocks.

Stag Brewery Environmental Statement – Detailed Analysis

Stag Brewery Mortlake		
Environmental Statement (ES)		Comments by Mortlake Brewery Community Group
1.	Introduction	
1.7	Site Context “An approximately 9.25 ha parcel of land....”	Need to explain why/how it has increased from 8.6 ha in 2017. It seems that the site now includes the towpath – is this with the approval of the Borough and PLA?
2.	EIA Methodology	No comment
3.	Existing Land Uses and Activities	
	Transport and Access	
3.17	“The closest bus stops to the Site are situated on Lower Richmond Road and Mortlake High Street. With routes 419, 969, N22 and 209 serving....”	Need to add: “and on Chertsey Road (A316) with route 190 serving Richmond, Hammersmith and West Brompton and on Mortlake Road (A205) with route R68 serving Kew and North Richmond.”
	Ecology	
3.34	“No roosting bats are present....”	Need to mention that foraging bats are present.
	Townscape and Visual	
3.42	Conservation Area.... Other Open Land of Townscape Importance (OOLTI)....	Need to mention that the Thames towpath within the site boundary is part of the Thames-side MOL; also that the adjacent Mortlake Green is an OOLTI.
4.	Alternatives	
	Education Uses and Location of the School	
4.26	“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.”	The ES has assumed that the optimal location would be on-site, not off-site. For the record it should be noted that the Council claimed to have considered alternative locations for the new school off-site, notably that part of Barn Elms which is outside MOL and which was rejected despite the

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4.41	<p>River Thames Transportation</p> <p>“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:</p> <ul style="list-style-type: none"> • due to the variance in tidal range, at low water the foreshore is exposed and therefore water craft can only move to and from the wharf either side of high water; • likely closure of the tow path during demolition and construction work; • the costs required to repair and upgrade the wharf; • distance to a suitability facility to load and unload the various materials.... journey time of 5-6 hours; • navigational conflicts with other river users such as rowers; • existing river bus services currently terminate at Putney Pier and provide a commuter service to Blackfriars with a journey time of around 45 minutes.... the site is approximately 6.2km from 	<p>ample space, excellent public transport access and Council ownership.</p> <p>The preferred option on-site was to the east of the playing fields. Gerald Eve’s Open Space and Playing Fields Assessment has given credit to MBCG for having generated this option (the ES has not done this) but indicated that ESFA were insistent on the playing fields becoming a single all-weather pitch.</p> <p>A problem for the river bus but surely not for barges carrying waste and construction materials which do not need to adhere to strict timetables.</p> <p>It could be bridged over.</p> <p>Have such costs been calculated? How does this compare with total journey time?</p> <p>Not an insurmountable problem.</p> <p>The intention would be to run a river bus service from Mortlake to Hammersmith only – as an alternative or supplement to the 409 bus.</p>

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	Putney Pier, as such the overall journey time to Blackfriars would be approximately 1hr 15 minutes.”	
5.	The Proposed Development	
	Public Realm and Amenity Space	
5.55	“A new public community park would be provided to the south of the new school....”	No mention of part of this park being used for a bus turnaround space.
	Private Realm and Amenity Space	
5.57	“Private amenity space would be provided in the form of ground floor communal courtyards and private gardens....”	This sounds like gated communities. Is this what the Council wants?
	Flood Defence	
5.85	“New flood defence walls would be provided.”	But the model in the library shows the Maltings plaza terraced down to the river without any sign of a flood wall. Confusing.
	Landscaping and Ecological Environment	
5.87	“A mix of approximately 200 evergreen and deciduous trees.... approximately 160 new trees and 51 retained trees.”	The ES does not indicate the number of trees being removed but it is noted that the site has been extended to include the towpath where trees are shown retained – presumably to compensate for the large number being removed.
5.88	“The existing towpath.... would be enhanced, including additional seating and pruning....”	No mention here of any agreement with the Borough and PLA.
5.89	“The development would provide.... biodiversity roofs....”	Where? Not shown on drawings.
5.90	“The works at Chalkers Corner would involve retaining 28 trees and the removal of 22 trees.... It is proposed to add a total of 33 new trees, resulting in an overall increase in 10 trees.”	These numbers do not tally with the numbers shown on the drawings. Also several trees being removed are over 15m high and the ES does not state how long it would take for replacement trees to grow to that height.
	Lighting Strategy	

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5.104	“The sports pitch would be served by floodlights.... An assessment of light trespass as a result of these floodlights has been provided....”	This assessment is not shown in Chapter 18 below.
6.	Development Programme, Demolition, Alteration, Refurbishment and Construction	
	Access	
6.38	“Access to the works.... will be via Ship Lane.”	It is not clear whether Ship Lane will remain open during the construction period. Clearly closure will have a negative impact on residents of Thames Bank and the pub. This must be clarified.
6.39	“It has been assumed that all construction HGVs would access the site from the west via Chalkers Corner.”	Why has this assumption been made? Alternative access mentioned in para 4.41 needs to be further explored.
7.	Socio-Economics	
	Housing Supply Effects	
7.22	“Affordable housing provision has not yet been determined.”	This chapter of the ES cannot be complete without an assessment of the effects of the percentage of affordable housing. Gerald Eve’s Town Planning Statement (para. 10.18) indicates that options involving 35% on-site provision were investigated and discounted at an early stage on viability grounds, and that (para. 10.21) the Financial Viability Assessment had appraised the development with 20%, albeit not in Phase 1. It seems that the ES has not kept pace with this.
	Educational Facilities	
7.58	“Summary information on primary school provision is set out in Table 7.10.... There is a +31 place surplus in capacity across all primary schools within a two mile radius.”	Table 7.10 is incorrect. It shows a surplus/deficit of 0.
7.63		

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7.64	“Summary information on secondary school provision is set out in Table 7.11.... with a deficit of -14 places.”	Table 7.11 is incorrect. The headings and totals in columns 2 and 3 should swap places. The ES does not mention that the LBRuT SPPS also states (P4): “it is apparent that demand for primary school places has plateaued...” It has been reported (not in the SPPS) that the take-up of primary school places Borough-wide in the current year is 2,174 as against a prediction in the SPPS of 2,476. If this downward trend continues the need for such a large school on the Brewery site must be questioned and reviewed. The ES needs to note that the Barn Elms site offered the advantages of very good public transport access from east and north Barnes although not from Kew. But then the chosen site at the Brewery does not offer good public transport access from Kew either, the R68 bus being somewhat infrequent.
7.66	“The LBRuT School Place Planning Strategy 2017 states there were 2002 places in Year 7 across the District. However, these places were not diversely spread out... “A need for additional places has grown in the eastern half of LBRUT, at a faster rate than was previously forecast....”	
7.70	“It is forecast that the children who are most at risk of not being admitted to any of the three schools in the eastern half of LBRuT live in Kew, and east and north Barnes.... The Stag Brewery site has been identified as the only suitable location for a new school in the east of LBRuT.”	
8.	Transport and Access	
	Local Bus Services	
8.99	“Table 8.20 shows the bus routes available within an 850m walking distance of the site.”	This table shows route 190 (not mentioned in para. 3.17 above) but not route R68.
	Construction Trip Generation	
8.100	During this period (2022) it is forecast that 82 one-way vehicle trips would access the site per day, of which 57 one-way trips are likely to be undertaken by heavy goods vehicles (HGVs).”	Why has this assumption been made? Alternative access by barge mentioned in para 4.41 above needs to be further explored.
	Transport-Related Development Proposals	
8.135		

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8.136	<p>“The number of car parking spaces proposed aims to achieve a balance between overprovision of spaces and therefore attracting more vehicles than necessary to the development and providing too little thus causing a negative impact on existing parking conditions within the local area around the site.”</p> <p>“15 spaces for the proposed 6-form entry secondary school.”</p>	<p>It would have been useful here to have explored the idea of less parking provision and maximum car club use thereby reducing the huge cost of building a flood-resistant basement [REDACTED] which could release funds for a significant increase in affordable housing.</p>
8.160	<p>Driver Delay</p> <p>“It should be recognized that the Chalkers Corner junction would work considerably better in the future with the development in place compared to the existing and future scenarios with no development (including no Chalkers Corner works).”</p>	<p>The plan shows 10 spaces for the school plus 5 for disabled parking. It is understood from the School Travel Plan (para 4.3.1) that the number of spaces is dictated by a standard of 1 space per two members of staff. Does this mean that this large secondary school will have only 20 staff? Where will the staff come from, given the lack of affordable housing in the area, and how will they travel to work given the poor public transport access?</p>
8.164	<p>Pedestrian Delay</p> <p>“The location of the crossing points that were assessed... are shown on Figure 8.1.”</p>	<p>Has the traffic modelling allowed for the latent demand which could cause the additional capacity to be very soon saturated?</p>
8.186	<p>Public Transport – Bus Service Capacity</p> <p>“The demand likely to be generated by the school is considered to be met by the take up of spare capacity on existing bus services or dedicated school bus services. The</p>	<p>These are all crossing points of roads within the site and its surrounds. They do not include the crossing of the railway on Sheen Lane both at ground level and via the footbridge. The ES must assess this.</p> <p>This is not acceptable. The assessment of bus service capacity needs to be done now, not at a later stage.</p>

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There is no evidence that anyone has incorporated the MCA and MBCG proposals submitted in October 2017. The only change is that the smaller room on the ground floor has lost some space to rubbish. The first floor has space for flexible use, but it is difficult to know how it could be used. This building has the potential to provide an excellent community space on the ground floor and spacious flats on each of the floors above. The plans suggested by the MCA/MBCG achieve this, these plans do not.

- The MCA/MBCG plans increased the available floor space by over 20%, better for community use and the flats.
- The two (in)flexible spaces on the ground floor are linked by a corridor on the river frontage thus wasting the potential of this riverside setting. People using a community centre would appreciate being able to see and enjoy a view of the river, why ignore it?
- The requirements of a community centre are for interconnecting rooms which are independently accessible. The present arrangement of two rooms, each with only one door, is inflexible and impractical.
- The shape of the rooms makes them hard to divide logically. The larger room is either two long thin rooms or four very small ones. The smaller room, with a section taken over by rubbish storage is equally inflexible.
- The majority of community activities include tea and biscuits. There is no small kitchen.
- There is no office space. No centre can run without administrative support.
- A key attraction of a community centre would be a café with a view of the river for both users of the centre and passers-by. A first-floor corridor accessible only by stairs with no space for catering does not provide this.

An enduring community space needs to be financially independent; It would be difficult to generate the requisite annual income from this inflexible design. In addition, it would make it extremely hard to raise the funds to fit it out, why would anyone want to invest in a building that was not of real benefit and use to the community it serves?

Many users of the Community Centre will be of poor or limited mobility, the model shows a ramp to the flat entrance but not to the general entrance.

The MCA and MBCG call on the Planning Committee to reject the plans for Building 4 as being unsuitable for a Community Centre and support the revisions originally proposed by the MCA and MBCG.

Health Facilities

The development will bring a 40% increase in local residents and one thing we should all expect to see are NHS GP and primary care facilities on the site.

It is positive to see that the plans include a Residential Care Home and a supported housing facility. However, the care provided in both will be largely private, will not include any NHS care and will be specifically for the people who live in these two places. Furthermore, many of the residents in the care home and housing facilities will have higher than usual needs for NHS primary and community care.

- WHERE ARE THE ADDITIONAL NHS SERVICES?: lack of any NHS facility could be a major concern; the developer recently suggested the minimal four clinical rooms may be dropped owing to lack of interest from local GPs - this is not acceptable
- EXISTING SERVICES BARELY COPING: Unless plans for additional services are made clear, current local residents will therefore have to wait even longer to get a GP appointment.
- EXTRA JOURNEYS TO GP, to OUTPATIENTS AND HOSPITAL lack of any additional facilities will only add to journeys, many of which will be by car (or by ambulance for the residents of the care home and the supported housing).
- NOT DOWN TO THE DEVELOPER ALONE the Richmond Clinical Commissioning Group has an important role to play but we should press Richmond Local Authority, through the planning process, to explain what the plans are for the much needed increase in NHS primary and community care services to match the needs of the additional population.

We urge the planning committee to ensure that adequate NHS facilities are provided with this site.

Chapter 10 - Environmental Impact Assessment

Stag Brewery Environmental Statement – Summary

- Alternatives – no assessment of off-site (as distinct from on-site) locations for the proposed secondary school (because clearly not within the brief); more rigorous assessment needed of the alternative method of transportation of all demolition waste, excavated soil and construction materials via the river instead of the road (this cannot be dismissed in a few sentences).
- Socio-economics – no assessment of the benefits of affordable housing, nor of the proposed school being as large as 6-form entry plus 6th form.
- Transport – more rigorous assessment needed of the proposed reconfiguration of Chalkers Corner which is likely to attract latent demand and very soon become gridlocked as at present; also of the school traffic; and of the potential for club car use as an alternative to car ownership.
- Noise – no assessment made of the benefits to residents of Lower Mortlake Road if transportation of waste and construction materials were made by river rather than by road.
- Air quality – no assessment of other toxic gases, vis. benzene, carbon monoxide, lead, ozone and sulphur dioxide in accordance with EC Directives; no rigorous account of the assumptions made about the potential decrease in pollutants resulting from any increase in electric vehicle use; no indication of how long it would take for new planting at Chalkers Corner to become effective as an absorber of air pollution.
- Ecology – no assessment of the loss of the grass playing fields as a food resource for birds.
- Visual – no assessment of the impact of the proposed reconfiguration at Chalkers Corner.
- Daylight/sunlight, etc – insufficient consideration of the overshadowing of the river, towpath and open riverside spaces caused by the proposed housing blocks.

Stag Brewery Environmental Statement – Detailed Analysis

	Stag Brewery Mortlake	
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
1.	Introduction	
1.7	Site Context “An approximately 9.25 ha parcel of land....”	Need to explain why/how it has increased from 8.6 ha in 2017. It seems that the site now includes the towpath – is this with the approval of the Borough and PLA?
2.	EIA Methodology	No comment
3.	Existing Land Uses and Activities	
	Transport and Access	
3.17	“The closest bus stops to the Site are situated on Lower Richmond Road and Mortlake High Street. With routes 419, 969, N22 and 209 serving....”	Need to add: “and on Chertsey Road (A316) with route 190 serving Richmond, Hammersmith and West Brompton and on Mortlake Road (A205) with route R68 serving Kew and North Richmond.”
	Ecology	
3.34	“No roosting bats are present....”	Need to mention that foraging bats are present.
	Townscape and Visual	
3.42	Conservation Area.... Other Open Land of Townscape Importance (OOLTI)....	Need to mention that the Thames towpath within the site boundary is part of the Thames-side MOL; also that the adjacent Mortlake Green is an OOLTI.
4.	Alternatives	
	Education Uses and Location of the School	
4.26	“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.”	The ES has assumed that the optimal location would be on-site, not off-site. For the record it should be noted that the Council claimed to have considered alternative locations for the new school off-site, notably that part of Barn Elms which is outside MOL and which was rejected despite the

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
4.41	<p>River Thames Transportation</p> <p>“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:</p> <ul style="list-style-type: none"> • due to the variance in tidal range, at low water the foreshore is exposed and therefore water craft can only move to and from the wharf either side of high water; • likely closure of the tow path during demolition and construction work; • the costs required to repair and upgrade the wharf; • distance to a suitability facility to load and unload the various materials.... journey time of 5-6 hours; • navigational conflicts with other river users such as rowers; • existing river bus services currently terminate at Putney Pier and provide a commuter service to Blackfriars with a journey time of around 45 minutes.... the site is approximately 6.2km from 	<p>ample space, excellent public transport access and Council ownership.</p> <p>The preferred option on-site was to the east of the playing fields. Gerald Eve’s Open Space and Playing Fields Assessment has given credit to MBCG for having generated this option (the ES has not done this) but indicated that ESFA were insistent on the playing fields becoming a single all-weather pitch.</p> <p>A problem for the river bus but surely not for barges carrying waste and construction materials which do not need to adhere to strict timetables.</p> <p>It could be bridged over.</p> <p>Have such costs been calculated? How does this compare with total journey time?</p> <p>Not an insurmountable problem.</p> <p>The intention would be to run a river bus service from Mortlake to Hammersmith only – as an alternative or supplement to the 409 bus.</p>

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
	Putney Pier, as such the overall journey time to Blackfriars would be approximately 1hr 15 minutes.”	
5.	The Proposed Development	
	Public Realm and Amenity Space	
5.55	“A new public community park would be provided to the south of the new school....”	No mention of part of this park being used for a bus turnaround space.
	Private Realm and Amenity Space	
5.57	“Private amenity space would be provided in the form of ground floor communal courtyards and private gardens....”	This sounds like gated communities. Is this what the Council wants?
	Flood Defence	
5.85	“New flood defence walls would be provided.”	But the model in the library shows the Maltings plaza terraced down to the river without any sign of a flood wall. Confusing.
	Landscaping and Ecological Environment	
5.87	“A mix of approximately 200 evergreen and deciduous trees.... approximately 160 new trees and 51 retained trees.”	The ES does not indicate the number of trees being removed but it is noted that the site has been extended to include the towpath where trees are shown retained – presumably to compensate for the large number being removed.
5.88	“The existing towpath.... would be enhanced, including additional seating and pruning....”	No mention here of any agreement with the Borough and PLA.
5.89	“The development would provide.... biodiversity roofs....”	Where? Not shown on drawings.
5.90	“The works at Chalkers Corner would involve retaining 28 trees and the removal of 22 trees.... It is proposed to add a total of 33 new trees, resulting in an overall increase in 10 trees.”	These numbers do not tally with the numbers shown on the drawings. Also several trees being removed are over 15m high and the ES does not state how long it would take for replacement trees to grow to that height.
	Lighting Strategy	

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
5.104	“The sports pitch would be served by floodlights.... An assessment of light trespass as a result of these floodlights has been provided....”	This assessment is not shown in Chapter 18 below.
6.	Development Programme, Demolition, Alteration, Refurbishment and Construction	
	Access	
6.38	“Access to the works.... will be via Ship Lane.”	It is not clear whether Ship Lane will remain open during the construction period. Clearly closure will have a negative impact on residents of Thames Bank and the pub. This must be clarified.
6.39	“It has been assumed that all construction HGVs would access the site from the west via Chalkers Corner.”	Why has this assumption been made? Alternative access mentioned in para 4.41 needs to be further explored.
7.	Socio-Economics	
	Housing Supply Effects	
7.22	“Affordable housing provision has not yet been determined.”	This chapter of the ES cannot be complete without an assessment of the effects of the percentage of affordable housing. Gerald Eve’s Town Planning Statement (para. 10.18) indicates that options involving 35% on-site provision were investigated and discounted at an early stage on viability grounds, and that (para. 10.21) the Financial Viability Assessment had appraised the development with 20%, albeit not in Phase 1. It seems that the ES has not kept pace with this.
	Educational Facilities	
7.58	“Summary information on primary school provision is set out in Table 7.10.... There is a +31 place surplus in capacity across all primary schools within a two mile radius.”	Table 7.10 is incorrect. It shows a surplus/deficit of 0.
7.63		

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
7.64	<p>“Summary information on secondary school provision is set out in Table 7.11.... with a deficit of -14 places.”</p> <p>“The LBRuT School Place Planning Strategy 2017 states there were 2002 places in Year 7 across the District. However, these places were not diversely spread out...</p>	<p>Table 7.11 is incorrect. The headings and totals in columns 2 and 3 should swap places.</p> <p>The ES does not mention that the LBRuT SPPS also states (P4): “it is apparent that demand for primary school places has plateaued...” It has been reported (not in the SPPS) that the take-up of primary school places Borough-wide in the current year is 2,174 as against a prediction in the SPPS of 2,476. If this downward trend continues the need for such a large school on the Brewery site must be questioned and reviewed.</p> <p>The ES needs to note that the Barn Elms site offered the advantages of very good public transport access from east and north Barnes although not from Kew. But then the chosen site at the Brewery does not offer good public transport access from Kew either, the R68 bus being somewhat infrequent.</p>
7.66	<p>“A need for additional places has grown in the eastern half of LBRUT, at a faster rate than was previously forecast....”</p>	
7.70	<p>“It is forecast that the children who are most at risk of not being admitted to any of the three schools in the eastern half of LBRuT live in Kew, and east and north Barnes.... The Stag Brewery site has been identified as the only suitable location for a new school in the east of LBRuT.”</p>	
8.	<p>Transport and Access</p> <p>Local Bus Services</p>	<p>This table shows route 190 (not mentioned in para. 3.17 above) but not route R68.</p> <p>Why has this assumption been made? Alternative access by barge mentioned in para 4.41 above needs to be further explored.</p>
8.99	<p>“Table 8.20 shows the bus routes available within an 850m walking distance of the site.”</p>	
8.100	<p>Construction Trip Generation</p> <p>During this period (2022) it is forecast that 82 one-way vehicle trips would access the site per day, of which 57 one-way trips are likely to be undertaken by heavy goods vehicles (HGVs).”</p>	
8.135	<p>Transport-Related Development Proposals</p>	

Stag Brewery Mortlake		
	Environmental Statement (ES)	Comments by Mortlake Brewery Community Group
8.136	<p>“The number of car parking spaces proposed aims to achieve a balance between overprovision of spaces and therefore attracting more vehicles than necessary to the development and providing too little thus causing a negative impact on existing parking conditions within the local area around the site.”</p> <p>“15 spaces for the proposed 6-form entry secondary school.”</p>	<p>It would have been useful here to have explored the idea of less parking provision and maximum car club use thereby reducing the huge cost of building a flood-resistant basement [REDACTED] which could release funds for a significant increase in affordable housing.</p>
8.160	<p>Driver Delay</p> <p>“It should be recognized that the Chalkers Corner junction would work considerably better in the future with the development in place compared to the existing and future scenarios with no development (including no Chalkers Corner works).”</p>	<p>The plan shows 10 spaces for the school plus 5 for disabled parking. It is understood from the School Travel Plan (para 4.3.1) that the number of spaces is dictated by a standard of 1 space per two members of staff. Does this mean that this large secondary school will have only 20 staff? Where will the staff come from, given the lack of affordable housing in the area, and how will they travel to work given the poor public transport access?</p>
8.164	<p>Pedestrian Delay</p> <p>“The location of the crossing points that were assessed... are shown on Figure 8.1.”</p>	<p>Has the traffic modelling allowed for the latent demand which could cause the additional capacity to be very soon saturated?</p>
8.186	<p>Public Transport – Bus Service Capacity</p> <p>“The demand likely to be generated by the school is considered to be met by the take up of spare capacity on existing bus services or dedicated school bus services. The</p>	<p>These are all crossing points of roads within the site and its surrounds. They do not include the crossing of the railway on Sheen Lane both at ground level and via the footbridge. The ES must assess this.</p> <p>This is not acceptable. The assessment of bus service capacity needs to be done now, not at a later stage.</p>