	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
	need for school bus services will be determined once the school's catchment is better understood.	There is no consideration in this section of the potential for a river bus (or duck rivercraft) service – and reasons for not pursuing further. It ought to be included for completeness.
9.	**Noise and Vibration**	
	Sensitive Receptors	
9.46	Existing receptors within the vicinity of the site are…. 5-68 Watney Road, 4-24 Williams Lane, 1-69 Lower Richmond Road, Chertsey Court and 139 Lower Richmond Rad.	Why have they not included residential properties in Mortlake High Street?
	Construction Traffic Noise	
	"82 one-way vehicle trips accessing 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 mentioned in para 4.41 above needs to be further explored.
10.	**Air Quality**	
	Assessment Methodology	
10.8	The most significant pollutants associated with road traffic emissions, in relation to human health, are NO2 and PM10. LBRuT has declared an Air Quality Management Area (AQMA) for the entire borough for annual mean NO2 and 24-hour mean PM10, attributable to rod traffic emissions … This assessment therefore focuses on NO2 and particulate matter (PM10 and PM2.5)."	In addition to NO_2 and PM_{10} the Air Quality Framework and the First, Second and Third Daughter Directives (2004/107/EC) give effect to European Union obligations for benzene, carbon monoxide, lead, ozone and sulphur dioxide in ambient air as a requirement. Please provide the data on the above mentioned pollutants – as per the Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998). All these pollutants are subject to monitoring and control under the Air Quality 4th Daughter Directive (2004/107/EC). Please provide a monitoring and mitigation plan actions for exceedances of the above pollutants in addition to PM_{10} and $PM_{2.5}$ as per the Air Quality 4th Daughter Directive.

	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
		LBRuT's Air Quality Plan does not comply with Directive 2008/50 and the Air Quality Standards Regulations 2010. It fails to require local air quality plans in local authority areas where NO_2 levels exceeded the limits imposed by the Directive but were expected to achieve compliance by 2021.The obligation in art.23 of the Directive to achieve compliance as quickly as possible is specific to each air quality reporting zone. The proponent needs to ensure that there is in place a plan for real time monitoring and reporting on air pollution to meet legislative obligation as per Air Quality 4th Daughter Directive (2004/107/EC) and in view of The High Court ruling, which followed a legal challenge by the campaign group ClientEarth, which concluded that the Government's July 2017 plan was insufficient to bring the UK into compliance with EU air quality objectives within the 'soonest timeframe possible', as required by law.
	Nitrogen Dioxide Sensitivity Analysis	
10.26	"A note on Projecting NO2 Concentrations published by Defra provides a number of alternative approaches that can be followed in air quality assessments, in relating to the modelling of future NO2 concentrations, considering that future NOx/NO2 road traffic emissions and background concentrations may not reduce as previously expected."	It would be useful to know what assumptions the consultants have made regarding what proportion of vehicles at the end date (2027) would be electric. This has not been stated.
	Local Monitoring	
10.62	Table 10.11 incudes London Road, Twickenham.	This location is not within 1km of the site.
	Likely Significant Effects	
10.76	Table 10.12 shows ecological effects as high risk, for which "mitigation measures would be required to ensure that	The ecological high risk is not addressed in the mitigation measures shown in Table 10.17.

	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
	adverse effects be minimized, reduced and, where possible, eliminated."	
	Construction Vehicle Exhaust Emissions	
10.79	"The development is predicted to result in a negligible impact at all receptors apart from at Chalkers Corner where a moderate adverse impact is predicted at Receptor 20 (Chertsey Court) and a substantial adverse impact at Receptor 21 (139 Lower Richmond Road)."	The title of this section is misleading as it sounds like it is referring to the exhaust emissions from the 82 construction vehicles accessing the main development site every day in 2022 (see para 8.100 above), whereas it actually refers to all traffic on the road during the construction works at Chalkers Corner in 2021. The impact at Receptor 21 is not surprisingly substantial adverse as the traffic is likely to be more tightly packed on Lower Richmond Road during the construction works.
	Completed Development	
10.96	"At Chalkers Corner there are two receptors predicted to be above the annual mean NO_2 AQS objective of 40mgm^3…. The development does not result in any new exceedances of the NO_2 AQS objective."	This depends on what assumptions have been made about improvements in NO_2 resulting from an increase in electric vehicle usage.
10.100	Table 10.15 show results of the sensitivity analysis in relation to NO_2 assuming no improvement in NOx and NO_2: Receptor 20 (Chertsey Court) – substantial adverse Receptor 21 (139 Lower Richmond Road) – substantial beneficial."	This is not surprising as the reconfigured road has moved closer to Chertsey Court.
10.109	"A new wall and new intensive green planting …. are proposed …. outside Chertsey Court…. These inherent measures…. will improve the predicted air quality…."	There is no indication of the time it will take for the new planting to become effective.
10.113		Please provide projected car, truck and motorbike traffic numbers used to establish non-significant impact

	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
	"Using professional judgment…. The overall effect of the development on local air quality is considered to be insignificant."	conclusion. If estimated please provide criteria used in running the model as per the Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998).
10.114	"It is considered that the effect of introducing future residential and school uses to the site is insignificant."	Based upon the ruling [2018] EWHC 315 (Admin); [2018] A.C.D. 40; the conclusions made as to the insignificant impacts to air quality conditions within the development is an unsafe conclusion. No analysis of school traffic has been attempted, no analysis of increased train traffic and therefore increased delays and increased emissions at the Mortlake train barriers have been attempted. The analysis lacks the influence of solar light on the production of NO_2 and NOx in addition to no mention of ozone. Please address as per Human Rights Act 1998.
10.115	***Nuisance Dust*** "The management controls would prevent the release of dust entering into the atmosphere and/or being deposited on nearby receptors, including the River Thames…. The management controls would include: • Record all dust and air quality complaints, identify causes, take appropriate measures to reduce emissions in a timely manner….	Please provide a time frame 24 or 72 hrs to respond to and deal with dust complaints. "Timely manner" is subjective and open to interpretation and does not provide the public with assurances dust complaints will be addressed as per Human Rights Act 1998. Please provide required time period to correct non-compliant air quality activities and consequences of multiple day exceedances. Please also provide means by which public has real time data, i.e. website, so that the project remains in compliance with air quality management plans etc as per Convention on access

	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
	• Hold regular liaison meetings with other high-risk construction sites within 500m of the site boundary to ensure plans are co-ordinated and emissions minimized. • Plan the site layout so that machinery and dust causing activities are located away from receptors…. • Avoid the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable. • Ensure equipment is readily available on the site to deal with dry spillages. Clean up spillages as soon as reasonably practical after the event using wet cleaning methods.	to information, public participation in decision-making and access to justice in environmental matters (1998). "Within 500m of the site" is not sufficient to address regional impacts of construction. Propose that the limit should extend through the Borough as construction along any of the other major roads will disproportionally impact those living along the construction routes. According to the modeling, the site is surrounded by sensitive receptors, both human and ecological. The suggestion that dust will be diverted away is questioned. How will this plan be accomplished and implemented in view of its sensitive location? The proposal to use non-diesel construction equipment where practicable is in conflict with EU Regulation 2016/1628 [3478] which specifies emission requirements for all categories of compression ignition (diesel) and positive ignition mobile non-road engines, replacing Directive 97/68/EC and its amendments. Please amend text to be compliant and remove reference to practicable. Control of Major Accident Hazard Regulation 2007 (reference 5) and the Environmental Permitting Regulations 2010 (reference 6) – under these regulations you have a statutory obligation to have an Accident Prevention plan in place and response. Also, please note in the documents that Environmental Damage Regulations (EDR) apply which force polluters to prevent and remedy environmental damage they have caused. They follow the 'polluter pays' principle.

	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
10.116	• Ensure vehicles entering and leaving the site are covered to prevent escape of materials during transport." "Such measures are routinely and successfully applied to major construction projects throughout the UK and are proven to reduce significantly the potential for adverse nuisance dust effects associated with the various stages of demolition and construction work. Therefore it is considered that the likely residual effects during the demolition and construction works due to fugitive emissions on all sensitive receptors (human and ecological) would be insignificant."	As foundation work will be carried out, please provide emergency plan for spills into the river Thames and deployment of river booms as per the Pollution incident response plan section 5. How is stormwater being managed and how will the project ensure no pollution discharges into the river Thames as a result of construction or after development? Please provide a stormwater prevention protection plan as per the EIA guidance for construction. Please include hazardous waste transport and storage plan in the construction documents as per BAT and EDR regulations and include in 'Pollution incident response plan Section 5'. This statement is challenged in that as many construction projects are fined due to significant impacts after implementation of dust monitoring plans as those found appropriate. Assumption that impacts are insignificant are not supported by the evidence presented. Please provide evidence to support this claim as per Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998).
11.	**Ground Conditions and Contamination**	Not reviewed.
12. 12.23	**Surface Water Drainage and Flood Risk** ***Tidal and Fluvial Flood Risk*** "Despite being located in an area at a medium to high probability of tidal flooding, the site is protected up to the 1 in 1000-year standard by the River Thames defences. The	In terms of the overall assessment of flood risk, this is robust and picks up all the key points national and local policy would expect, i.e. no increase in flood risk. The ES

	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
	Thames Estuary 2100 Plan (TE2100) would ensure that the River Thames defences are not overtopped for the lifetime of any redevelopment on the site. Furthermore the site currently benefits from tidal defences along the river frontage…. from the site boundary walls and the Maltings building."	seems also to be suggesting a betterment as a result of the provision of the new Thames Tidal defences, modelled finished floor levels in line with TE2100, safe access/ egress, etc.
12.65	"In summary the development would be designed to ensure all residential accommodation and most of the non-residential accommodation would be safe from tidal flooding. Exceptions…. one entrance to the basement car park located with the east part…. As such, the development is likely to result in an…. effect of minor significance."	Noted.
12.70	"Surface water runoff from the north east of the Stag Brewery component of the site would discharge by gravity to the River Thames…. Surface water runoff from the remainder of the…. site would discharge via gravity to the Thames Water sewer network in the surrounding highways….	It would be worth seeing what the response to the capacity check with Thames Water is. The separate EIA study section 4.3.3. states that a pre-development enquiry has been submitted, but presumably the response was not ready in time for the application?
12.71	Approximately 2,655m³ of attenuation storage would be required, accounting for a 40% increase in rainfall intensity due to climate change…. provided via attenuation tanks."	Noted – this appears sufficient to accommodate runoff from the all-weather pitch.
	Mitigation Measures	
	Surface Water	
12.97	"Temporary stockpiling of materials would be located away from the Thames and drains and drums and barrels would be stored in designated bunded safe areas within the site compound to reduce the risk of silt and pollutants entering the surface water drainage system."	Noted.
	Risk to Occupants	

	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
12.106	"A self-activating flood barrier would be required for the entrance to the eastern basement car park from Mortlake High Street."	This is not explained in the supporting text but it is noted that details appear in the appendix.
13.	**Ecology**	
	Surveys	
13.10	References to Appendices for survey results.	It would have been helpful to have seen more detail of the surveys without having to refer to appendices.
13.24	"No roosting bats were found during the emergence/re-entry surveys…."	Even so the ES has considered mitigation measures in the expectation that there could be roosting bats, which is commended.
	"No black redstarts were found during the surveys in 2016."	No mention of all other species found on the surveys.
	The Works: Effects on Bats	
13.49	"Some pruning of understorey vegetation to open key views would be undertaken along the towpath. However, this would not have a significant effect on bats."	On the contrary, the pruning of such vegetation could diminish food supply for bats – and birds.
	Completed Development: Overshadowing	
13.53	The likely effect of overshadowing to existing surrounding amenity areas (i.e. the River Thames)…. is therefore insignificant.	On the contrary, the proposed buildings are taller than the existing and the overshadowing will increase.
	Completed Development: Effects on Bats	
13.55	"The completed development is not anticipated to have a direct impact on existing foraging and commuting bats using the northern boundary of the…. site given the retention of trees."	Not all the trees on the northern boundary of the site behind Thames Bank are being retained.
13.55	"The completed development would have a…. beneficial effect of minor significance."	This is debatable.
13.59	"Both the existing sports field and proposed sports pitch hold little habitat value for bats."	The sports field is used by many other species as food resource and there are regular sightings of herons,

	Stag Brewery Mortlake	
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		starlings, stag beetles etc. Bats forage along the tree line where the school planned. Grass is natural and a food source; the proposed MUGA is neither.
13.66	***Completed Development: Mitigation*** Appropriate mitigation in the form of a Landscape and Environmental Management Plan would be implemented to manage and ensure the permanence of the roosting, foraging and commuting habitats.	Who would be responsible for this? Lots of issues to cover in this long-term.
14. 14.33 14.35	**Archaeology** ***Non-Designated Heritage Assets*** "The site of the palace of the Archbishops of Canterbury is known to have been present by 1099 until the 16th century. "Remains of a Renaissance mansion owned by Thomas Cromwell, Earl of Essex (Cromwell House c. 1491-1857) may survive within the north western boundary…."	The ES has recognized the high importance of these two sites and the need to allow time for rescue archaeology. No further comment.
15. 15.60 -62	**Built Heritage** ***The Former Hotel Building (BTM)*** "The development would reinstate the historic hotel use…. externally the appearance of the heritage asset would remain largely unaltered…. effect of minor significance."	Agreed, no comment.
15.63 -66	***The Former Bottling Building (BTM)*** "Construction of a new building behind the retained façade…. gym, retail unit, office space…. new windows…. effect of minor significance."	Agreed, no comment.
15.67 -70	***The Maltings Building (BTM)*** "Conversion of the building to residential apartments and community space…. new floors would be inserted…. largely consistent with the floor levels that existed historically,	It would be useful to have an explanation for why certain windows are to be elongated.

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	albeit that two of the floors will be double height…. Several existing windows are proposed to be elongated…. effect of minor significance." ***Thames Bank (Grade II Listed Buildings and BTMs)***	
15.83 -84	"The development would be an enhancement when compared to the existing situation…. would also be in keeping with the scale of development that would have existed historically along the riverfront…. effects of minor significance."	It is noted that the proposed development behind Thames Bank rises to 3 storeys and that most of the existing trees along this boundary are being saved. The impact on Aynescombe Cottage within the Mortlake Conservation Area needs careful attention.
16.	**Townscape and Visual Effects** ***Visual Assessment***	
16.11	"The photographic locations for each viewpoint were agreed via consultation with LBRuT. This included a walkover of the local area surrounding the Site with representatives of LBRuT on 4th July 2016."	Why were views of the Chertsey Court OOLTI at Chalkers Corner junction not included? Presumably because the proposed reconfiguration of the junction was not on the agenda at the time? Such views ought to be included – and indeed have been, albeit not in this report. The ES needs to show the visual impact of removing trees from the front gardens of Chelsey Court which are designated an OOLTI and the transference of the displaced part of this OOLTI onto the opposite side of the road. It needs to argue the case for doing this, which is highly questionable, and it has failed to do so.
	Likely Effects of the Completed Development on Views	
16.77	1. "For many residents and road users in the locality this would provide an extent of soft edge to the development." 4. "The development would be conspicuous by the height and mass of new built form against the skyline…."	No mention here of the school building encroaching onto the wide open space of the playing fields OOLTI. This is because the proposed buildings rise to 7 storeys sheer without any setback. The ES should note that the

	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
		Planning Brief had stipulated "stepping back from river". This comment also applies to views nos. 5, 6 and 7.
17.	**Wind Microclimate**	
	On-site conditions	
17.52	"The assessment… has demonstrated that even in the absence of mitigation the majority of the Stag Brewery component of the site… would be suitable for its intended pedestrian activities."	It is noted that the assessment has included wind tunnel tests of thoroughfares, entrances to buildings, ground level amenity areas and balconies. No comment.
	Off-site conditions	
17.61	"Surrounding conditions with the completed development in place would generally be the same as existing conditions, therefore no mitigation measures would be required and the likely residual effect would be insignificant."	It is noted that the assessment has included wind tunnel tests of the same in all surrounding areas including Mortlake Green, the towpath and River. No comment.
18.	**Daylight, Sunlight, Overshadowing and Light Pollution**	
	Table 18.11 Completed Development	
18.144	Daylight to surrounding receptors – insignificant except:	
	Butler House, Aynescombe Cottage – minor significance.	Noted.
	Rann House, 2-6 Williams Lane, Churchill Court and Jolly Gardeners – minor to moderate significance.	Noted.
	Sunlight to surrounding receptors – insignificant.	Noted.
	Overshadowing on surrounding amenity areas – insignificant.	The towpath is one of the surrounding amenity areas and must surely expect to be overshadowed?
	Overshadowing on proposed amenity areas – insignificant to moderate significance but detailed design during reserved matters may result in reduced maximum extents.	This sounds unbelievably optimistic?
	Light pollution – insignificant.	

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	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
		No assessment given of proposed floodlighting of all-weather sports pitch.
19.	**Cumulative Effects**	No comment.
20.	**Mitigation Measures and Likely Residual Effects**	No comment.
10.	**Air Quality (Additional Comments on Appendix)**	
Table A7	24 hours	If the school is for over 1000 pupils why are only 543 daily trips accounted for, which is 272 pupils being dropped off and picked up. How will this assumption be enforced and what consequences will be applied if this is shown to be an underestimation of the trips?
Table A7	24 hours	For the active community of Mortlake assuming 8 trips a year by car to the area is a gross underestimation. Please provide means and methods of how these numbers were obtained as per Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998)
Table A7	24 hours	Please provide data for all instances of trip traffic proposed in Table A7. According to the UK Government white papers "**The UK Treasury recognizes and has published guidance on the systematic tendency for project appraisers to be overly optimistic in their initial estimates**" and the public has a right to be informed about how this data were generated as per Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998)
10.183	Lack of adjustment factors applied to PM10 and PM 2.5 results	Lack of experimental data and lack of application of adjustment factor invalidates the model of predicting

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	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
		PM10 and PM 2.5 data. Data should be collected from the proposed development site as per the Air quality 4th Daughter Directive (2004/107/EC)
10.186	Microclimates are not included in the model predictions.	Model options: ADMS 5 has a number of model options including: dry and wet deposition; NOx chemistry; impacts of hills, variable roughness, buildings and coastlines; puffs; fluctuations; odors; radioactivity decay (and γ-ray dose); condensed plume visibility; time varying sources and inclusion of background concentrations. Microclimates are included in the functions of the model. Please rerun the model to include the contribution in this analysis.
10.186	Modelling margin of error and validity of model used	What is a margin of error in the computer models used to predict air quality pollution levels. The validation of the model section states that levels of inaccuracy exist, what are the margins and are the greater than or less than other models used as standard practice in the profession.
10.186	Correlation coefficient	The author suggests that the model is accurate although he data presented for the correlation coefficient indicates an under estimation of the values. The values are underestimates and should be presented as such in the body of the document, not in the technical appendices.
Table A17	Statistical calculations	The results are based on modeled values and therefore to expect a statistical difference between unadjusted and adjusted values is nonsensical. The model should compare measured values and modeled values for the verification to have any value in predicting air quality conditions. Please provide spreadsheets with data as per Convention on access to information, public participation in decision-

	Stag Brewery Mortlake	
	Environmental Statement (ES)	**Comments by Mortlake Brewery Community Group**
		making and access to justice in environmental matters (1998)
10.182	Decision not to apply further refinement of the air quality model	Please provide the results from the model verification procedure to be analyzed as per Convention on access to information, public participation in decision-making and access to justice in environmental matters (1998)

Chapter 11 – Other Procedural Matters

This chapter provides an overview of the engagement of the developers with the community prior to the submission of the planning applications.

The MBCG with other members of the community has been involved in the consultation process. While the developers arranged several consultation meetings, these CLG meetings left little room for discussion as they were mainly monologues with the architects and consultants presenting their designs.

We acknowledge that there were alterations to the design during this process, however, these just realigned the design to accord with the 2011 Planning Brief and other planning policies and/or were subsequently reversed.

We feel that there have been inadequate responses on the main issues that were raised and dominated most meetings.

We would draw the Council's attention to the following.

1. Chapter 4, section 8 – this is a summary of how the masterplan was informed by the consultation

This accurately records that four of the most common issues raised throughout the consultation were:

- proposal for secondary school with 1200 pupils
- level crossing at Mortlake Station
- On street parking in the surrounding area
- Traffic management at Chalker's corner
- Cumulative density of the development
- Loss of sports fields

The text then states the following:

"In response the Applicant has proposed a series of associated road interventions outside of the site boundary that are to be agreed and secured through an agreement with the Council."

Comment: This one page alone is good evidence of how inadequate the Developer's response is to the concerns raised by the community. It is totally insufficient to argue that the proposed road interventions are an adequate to address the four points summarised immediately above. Furthermore, there is no reference whatsoever anywhere in this document to any response from the Developer about the implications of the plans for the level crossing at Mortlake Station.

2. Page 58 – this captures public views as at **February 2018,** AFTER the developer had made adjustments. People were given the chance to write in their own comments in open-ended questions.

> Transport and Traffic: Of the 566 people who chose to raise this, 443 or **78%** continued to have concerns.
>
> New homes, heights and density: Of the 502 people who voluntarily raised this 338 or **67%** continued to have concerns.
>
> School: 419 people chose to raise this of whom 342 or **81%** still had concerns at the end of the process.
>
> Environment: Of the 44 people who chose to raise this, 44 or **100%** continued to have concerns
>
> The pie charts alone do not adequately reflect the volume of comments on different topics and we would urge the Council to note the **numbers** cited on each pie chart.

3. Chapter 8 (page 67 onwards) provides a useful summary of the points raised at each of the three successive consultation stages and the action taken by the developers.

> Page 67 gives a narrative summary of the concerns raised and the Developer's response. Section 8.2 at page 67 is evidence by omission of how totally inadequate the Developer's response is to traffic concerns. For example no mention whatsoever is made of the impact of the development on the Level Crossing at Sheen Lane/Mortlake station and there is no response on concerns seeking improvements to public transport or actions to reduce traffic arising from the development.

4. Page 75 is most telling. It captures in a table the concerns and action taken at the final stage (July 2017-February 2018), stage 3. From this table it is clear that even at the end of the process, the consultees did not consider that the action taken by the Developer sufficiently addressed their concerns. Furthermore, we consider the responses in the 'Action Taken' column to the remaining concerns to be wholly insufficient to address the depth and number of concerns.

5. Specifically the table on page 75 it states

> "People expressed continuous concerns about the traffic impact and the capacity of the proposed traffic interventions to address the issue."
>
> The action taken in response to this is listed on the same table as "Transport consultants PBA tested the proposed interventions with

additional strategic modeling in collaboration with TfL to confirm that the interventions suggested will in fact mitigate the traffic impact of the development"

This is wholly inadequate. It is wrong and incorrect to state that because something is "modeled" that "it will *in fact* mitigate" the traffic impact. Models are built on assumptions and assumptions can be adapted to produce different outcomes – we would ask the developers to share a range of outcomes. Furthermore, it defies all logic to argue that widening one road junction at one end of the development mitigates "the traffic impact of the development" - when no attention is given to (a) the impact of entry and exit into the site, ie site residents turning right onto Lower Mortlake Road (b) the impact on the Lower Mortlake Road of a higher volume of traffic backing up when the level crossing is closed or (c) the access to their homes for existing Mortlake residents living between Sheen Lane and White Hart Lane and (d) the implications for public transport buses of being stuck in predictable heavy and slow moving traffic.

6. The table on page 75 states "There are still concerns about the density being too high/there being too many housing units".

The action noted in response states that "the number of housing units has been reduced from the first and second masterplan."

This is not acceptable as a final response; the density and massing of the site are still too great for the tightly bounded nature of the site and the fact that consultees still had concerns demonstrates at the end of the process demonstrates that the marginal adjustments made by the developer are not sufficient to take account of local views of the impact of the development on the surrounding area.

7. Finally the document refers to meetings held with a CLG – a 'community liaison group' convened by soundings. We wish to make clear that the time spent in these meetings was largely dominated by the Development team giving presentations and filling the time themselves, with very little time for discussion or liaison. Indeed this issue with the meetings was repeatedly raised by those attending but the format was never changed.

Chapter 12 - Conclusions

Over the years Mortlake has lost its community/village feel. With the building of a dual carriageway, the demolition of six of the original eight pubs and the recent building of high cost housing, the heart has been ripped out of Mortlake village. There is now only a small row of shops, two of which are boarded up and the High Street needs refreshing. There is an infrequent bus service passing through between Richmond and Hammersmith and no transport link to East Sheen. Community is about people and their environment and integrating the old with the new. For Mortlake the development of the brewery site brings a real once in a lifetime opportunity to enhance the locality and potentially put to use a building, such as the Maltings, for community activities.

The proposals fail to activate and animate Mortlake High Street, missing opportunities to sensitively create strategically placed openings to the streetscape frontage of the Hotel/Bottling Building and instead introduce negative features on the new block facing the High Street including ramps and a sub-station which make no contribution to animating the neighbourhood.

We remain supportive of the 2011 planning brief's proposals which has a good balance of housing (including affordable), commercial/retail units, green spaces extending from Mortlake Green to the river, while retaining some of the historical aspects of the area. In complying with the principles of this brief, the development would be an asset to the local community and were influential in producing the 2011 Stag Brewery Planning Brief.

In summary, we have the following objections to the three Stage Brewery Planning Applications:

- The combined density of the scheme is too high. The site is not big enough to support 897 residential units a 1,200 pupil secondary school and 11,616 sq. m. of commercial uses. This does not comply with Local Plan policies on local character and design quality, DM DC1 and LP1, in terms of scale, height, massing and density. One of these dimensions needs to be reduced for the development to be sustainable.
- If a school of this size is required on the site (as to which there remain important questions to be resolved), then the housing and commercial use must reduce.
- The plot allocated for the school is not large enough for the number of pupils and is still partially sited on the playing fields. This is not an inner-city location. Other local schools have significantly more space. An MBCG consultant is investigating this and its conclusions should form part of the evidence base.
- The proposed development is too densely populated and is three times denser than the surrounding areas, 2.5 times more dense than the GLA guidelines and materially exceeds the proposed housing densities set out by the Local Plan policies mentioned above.
- The heights of some of the buildings significantly exceed those set out in the 2011 Planning Brief and the site does not in all cases diminish in height at the perimeter as specified in the Planning Brief. The Planning Brief was clear: if extra density is required for viability, it should be located towards the centre of the site where taller buildings are currently found.
- The compressed layout and building heights place many, and large proportions, of the external open spaces including the towpath in permanent shadow. This does not comply with Local Plan policies on amenity and living conditions, DM DC5 and LP8. There is also an impact on existing residents: Building 21 is extremely close to the properties on the Thames Bankside and Buildings 18 to 20 to Williams Lane and Wadham Mews and the other

residents to the north west of the site. Any detrimental effect (loss of light) on existing properties, particularly in the north west of the site, must be further assessed.

- We question the viability of the number of retail outlets, cinema and gym given the proximity of similar businesses in East Sheen. There is a successful cinema in Barnes and a proposed gym development in Sheen.
- The 40% increase in Mortlake residents and the new users of the school and retail outlets will have a significant impact on the local transport and traffic, and would not comply with Local Plan policies on transport, CP5 and LP44. Our own survey suggests that the number of people and traffic movements have been underestimated and we do not believe that the solutions adequately address the impact.
- The Chalker's Corner changes will not resolve the issue of increased traffic but will simply attract further through traffic when other roads are congested. This is a strategic junction which requires a strategic solution from TfL, the council and the developer.
- The increased traffic and movement of this junction will have a significant impact on pollution levels which already exceed European levels. There is no assessment of the other toxic gases (benzene, carbon monoxide, lead, ozone and sulphur dioxide) in accordance with EC Directives and their impact on air quality.
- There is no public transport strategy. None of this complies with Local Plan policies mentioned above, CP5 and LP44. In the current era when we need to encourage a move away from car use, there needs to be proposals which seriously consider how public transport can be improved in the local vicinity.
- There is no plan to address the pedestrian and vehicular risks at the Sheen Lane level crossing. This is a high-risk crossing, as identified by Network Rail. The development at the Stag Brewery, particularly from the school, will increase numbers of pedestrians and cyclists seeking to cross the railway either by the footbridge or at road level is of very serious concern and must be addressed by including some material improvement in safety conditions at the level crossing. Again this does not comply with Local Plan policies CP5 and LP44 mentioned above. As a minimum, the planning application needs to address this in conjunction with the Borough and Network Rail; a significant contribution of the costs of providing this material improvement should be secured through a s106 agreement.
- The 2011 planning brief clearly states that the OOLTI land on the playing fields will be retained. The developer has not adequately demonstrated that all the criteria (quantum, quality and openness) have been met to allow for the building on this land. A 3G pitch and floodlighting are opposed. This does not comply with Local Plan policies DM OS3 and LP14.
- The proposed provision for affordable housing provision is too low, too concentrated in one area and delivered too late in the development. The proposed 20% is lower than the target set by the council and does not comply with Local Plan policies DM HO6 and LP37. Our examination of the Financial Viability Assessment strongly indicates that the developers have sufficient margin to offer up to 35%. There also needs to be certainty that the affordable housing commitment will be delivered.
- There is no surgery or pharmacy in Mortlake. The 40% increase in Mortlake residents will increase the strain on existing NHS services in Sheen. Additional provision of NHS facilities must be provided with this development as indicated in Local Plan policies CP17 and LP30.
- There is no solution to primary school provision, either for new residents of the site or for those existing residents who will be displaced out of catchment through the new development.

We urge the council to ensure that these issues are addressed.

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Appendices

Appendix
Chapter 5 Transport Appendix 1 - MBCG's Manual and Video Surveys
Chapter 5 Transport Appendix 2 - MBCG's Forecast of Travel Demand due to the Development
Chapter 5 Transport Appendix 3 -Issues to do with the Sheen lane Level Crossing
Chapter 5 Transport Appendix 4 - Further Technical Comments
Chapter 5 Transport Appendix 5 - MBCG's Letter to local MP Zac Goldsmith
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Chapter 5 Transport Appendix 1 - MBCG's *Manual and Video Surveys*

1 The queue lengths measured are significantly influenced by the level crossing barrier closures – both its frequency and duration. Additional factors affecting queuing in Sheen Lane include the presence of vans and lorries parked or loading south of the railway, the interaction of Vernon Road traffic and the oftenhigh numbers of pedestrians, buggies and cyclists concentrated in the confined and exposed areas on each side of the barrier. Often, but particularly during the longer periods of barrier closure, the whole of the local road network is filled with stationary or slow-rolling queues of vehicles. These queues would extend to the Upper Richmond Road. White Hart Lane and to Mortlake Green (the latter from Chalker's Corner).

2 The Southbound queue in Sheen Lane approaching the barrier can extend beyond the Mortlake High Street roundabout and into both Mortlake High Street by up to 8 vehicles and into Lower Richmond Road.

Table A1.1 : Queuing in Sheen Lane, Mortlake High Street and Lower Richmond Road

Time/Day	*Max. Northbound Q South of Railway (vehicles)*	*Max. Southbound Q North of Railway*	*Max. Northbound Q North of Railway*	*Max. Westbound Q in Mortlake High Street*	*Max. Westbound Q in Lower Richmond Road*
Wednesday 17th May					
7.30-8.00	34	18	17	25++	34
8.00-8.30	27	17	17		46
8.30-9.00	58	19	17		49
9.00-9.30	49	17	17	25++	49
16.30-17.00	17	16	16	20+	36
17.00-17.30	28	14	12	50+	41
17.30-18.00	28	18	16	50+	40
18.00-18.30	31	16	19	20	39
Thursday 18th May					
7.30-8.00	23	18+	10	18+	88
8.00-8.30	19	16+	10	18+	104
8.30-9.00	22	18+	12	18	72
9.00-9.30	20	18+	12	18+	92
16.30-17.00	28	20	?	30+	
17.00-17.30	26	18	25	30	
17.30-18.00	26	33	14	25	
18.00-18.30	32	25	11	2?	

Table A 1.2: Manual Surveys Conducted at the Level Crossing

Date/Time	Number of Closures	% Time Closed	Number of Trains
17th May			
7.30-8.00	6	50	8
8.00-8.30	7	53	9
8.30-9.00	4	83	11
9.00-9.30	5	47	8
16.30-17.00	5	57	8
17.00-17.30	5	60	11
17.30-18.00	2	37	5
18.00-18.30	3	87	11
18th May			
7.30-8.00	7	63	14
8.00-8.30	6	60	10
8.30-9.00	5	43	8
9.00-9.30	4	50	7
16.30-17.00	7	60	9
17.00-17.30	7	57	8
17.30-18.00	5	27	6
18.00-18.30	8	90	16

Chapter 5 Transport Appendix 2 - MBCG Forecasts of Travel Demand due to the Development

Residential Units – Assume 668 standard units plus say 40% of the 150 "flexible" units equivalent to c. 728 units for traffic generation purposes but excluding staff trips for the care home for 70 people

Table A2.1: Residential M/Split AM Peak (8-9) Per Unit

Mode	*Total Arrivals and Departures*
Pedestrians	0.2
Cyclists	0.01
Vehicles	0.23 (Kew Riverside)- 0.42 (TRICS Outer London and Home Counties average)
OGV	
Taxi	
Bus	0.02
Train	0.02

Table A.2.2 : Secondary School M/Split AM Peak (8-9) Per Pupil – Source TRICS London Sites

Mode	*Arrivals*	*Departures*	*Total*
Pedestrians	0.38		0.38
Cyclists	0.1		0.1
Vehicles	0.17	0.15	0.32
OGV	0.001	0.001	
Taxi	0.002	0.002	
Bus	0.2		0.2
Train	0.15		0.15

The TRICS sites used here are secondary schools in Wood Green (1091 pupils) and Finsbury Park (850) pupils in locations with similar accessibility to the STAG brewery site. It is noted that PBA has been requested to use Christ's, Grey Court and the Richmond Park Academy as comparator sites (with the RPA subsequently excluded as it apparently lacks a school travel plan). The submitted material includes details from Richmond upon Thames Council of the traffic generated by Christ's school (770 pupils and 90 staff) and Grey Court (1246 pupils and 146 staff) operating with the benefit of travel plans. Even with similar travel plans in place for the proposed school on the Stag site, some 300 vehicle movements would be generated in the morning peak hour taking the average rate arising from these two schools

Chapter 5 Transport Appendix 3 - Issues to do with the Sheen Lane Level Crossing

NDC's Video Surveys Summary – Extract for the Period 8 – 9am

Number of Trains (2-Way) – 21~23

Number of Level Crossing Barrier Closures – 11~11

Maximum Closure Duration – 8.12~8.42 minutes

Total Closure Time – 34.7~44.5 minutes

Average Barrier Closure Time Before First Train – 95 ~ 115 seconds

Barrier Opening Times After Last Train – 17~23 seconds

Motorised Vehicles over Crossing (2-Way) – 408~449

Cyclists over Crossing (2-Way) – 61~79

Pedestrians over Crossing (2-Way) – 330~392

Buggies over Crossing – 22~33

Pedestrians Using Footbridge – 212~272

Cyclists Using Footbridge – 18~19

The 48 hour video record reveals several examples of what may be described as "notable incidents" or occasions when the risk of accidents between vehicles and pedestrians and of damage to the barriers appear high. Table A3.1 summarises these occasions.

Table A3.1 : Some Examples of High Risk Occasions Revealed in the 48 Hour Video Survey

Time	*17.05.17*	*Time*	*18.05.17*
07.12.06	*HGV reversing into Builder's merchant*	*15.45.24*	*Heavy pedestrian flows very close to moving vehicles*
07.21.30	*As above*	*15.57.15*	*As above*
07.54.46	*OGV on wrong side of road*	*17.11.51*	*Stationary OGV* ***On wrong side beneath closing barrier (see screen shot below)***
08.10.42	*Car/cycle near miss*		
08.29.22 08.38.36	*Heavy pedestrian and vehicle flows*		
08.40.20	*Stationary OGV beneath closing barrier*		

Below is a series of photographs showing the difficulties pedestrians already face in reaching Mortlake station and the level crossing area.

MBCG Forecasts for the Sheen Lane Level Crossing

School walk trips to Level crossing= 1250 x 0.38 x 0.5 (South) = 237 plus -

School rail trips **1250 x 0.15 x 0.5 (West-bound) = 94 giving a total of 331**

School cycle trips 0.1 x 1250 x 0.5 (South) = **62**

School Vehicles over crossing 1250 x 0.32 x 0.33 (South) **= 132**

Res Peds to Level Crossing = c.728 x 0.2 x 0.5 (South) = 73

Res Peds to Station = 728 x 0.02 x 0.33 (West-bound) = 5. Total **78**

Res Cyclists to level Crossing = 728 x 0.01 x 0.5 **= 4**

Total Additional Peds to Crossing is 331 + 78 = **409 plus those generated by the additional land uses.**

Total Additional Cyclists to Crossing is **66** plus as above.

Res. Vehicles over Crossing c.728 x (0.23 ~ 0.42) x 0.33 = **55~101**

Total Additional Vehicles over Crossing is 132 plus (55~101) = **187~233**

Table A3.2 : Existing and Forecast Demand at the Level Crossing – 8-9am

Movement Type	*Existing Demand (average of 2 survey days)*	*Existing Ground level and Bridge Total*	*Stag Brewery Demand (MBCG provisional)*	*Stag Brewery Demand (PBA)*	*Total Demand*	*% Increase*
Pedestrians Crossing at Ground Level and using Footbridge	c.361 at Ground Level. c. 242 on Footbridge	603 (MBCG) 387 (PBA)	409 including footbridge	94 and 119 = 213 TN 18 Table 4.6	1012 (MBCG) 283 and 304 = 587~600 (PBA) t	68 (MBCG) 52 (PBA)
Cyclists crossing at Ground Level and using Footbridge	c.70 at Ground Level. c. 24 on Footbridge	c.94 (MBCG)	66 including Footbridge	?	160 (MBCG)	70 (MBCG) ?(PBA)
Vehicles over the Crossing	428 MBCG) 491 (PBA)		187~233 (MBCG)	71 (Table 4.2)	615~661(MBCG) 562 (PbA)	44~54 (MBCG) 15 (PBA)

Chapter 5 Transport Appendix - 4 Further Technical Comments

Any examination of the Transport Assessment reports is made very difficult given the poor indexing etc. of the material supporting the planning applications.

Trip Generation: We do not see any definitive sign off from RUT or TfL but clearly there has been much discussion and amendment. One concern is the comparability of TRICS sites and visitor numbers. The Stag site is highly severed by the river, railway etc. and this constrains vehicle access and trips given the lack of a walk catchment. If TRICS sites with high walk accessibility have been used then this could under-estimate vehicle trips. We find the vehicle trips for some ancillary uses such as hotel quite low and whether due regard has been paid to taxi trips may be an issue, especially given the remoteness of the site.

There is a forensic point relating to TRICS, which is use of main or final mode – the latter under-estimates car trips where people park in the surrounding area and are picked up as walk trips in final mode.

Highway Model: The use of the SoLHAM SATURN model accords with TfL guidance but does make the definition of impacts quite opaque. The TA admits that congestion in the 2031 future base results in traffic being held back in the surrounding network or diverted away from the site area. We would have expected the local junction models to be run with 2031 future base flows and development traffic manually added as per the trip distribution. The assignment of the 2031 + Development trips in the model obviously results in network rebalancing and probably results in a reduced marginal impact. We have rarely seen the PBA approach used in isolation from manual addition.

It is almost impossible to track the flows through the different scenarios as the TA mixes vehicles/pcus and 1/3 hour peak flows at various points – meaning that the difference between 2016 base flows and with development flows impossible to work out.

Highway Assessment: The TA takes the line that the future base is so congested that a) the development has little marginal impact and b) the two highway schemes mitigate the development impact. The LINSIG and ARCADY results bear this out and without a forensic analysis of the models it is difficult to dispute. The focus of the assessment is quite narrow and given that Sheen Lane obviously cannot take much more peak hour traffic we would have expected more to be said about traffic through Barnes High Street and along White Hart Lane. The junction models do not however assess interactions and this is where TfL must scrutinise the VISSIM models. There is significant interaction between the Chalker's Corner, Clifford Avenue and Sheen Lane junctions and I am not convinced that the Chalker's Corner scheme would mitigate this. It would be interesting to see how the reservoir between the Mortlake Road and Lower Richmond Road nodes works in practice – our feeling is that it will struggle to cope even with the improvement and this could increase queues north on Clifford Avenue.

Lower Richmond Road (LRR) is operating at about 93% in AM peak 2017 and both left and right turn lanes are similarly saturated.

The total flow goes from 699 to 766 in the 2031 base which results in saturation increasing.

However, with the Development, the LT increases by 14 pcus and the RT by 7 pcus – hence little change which is surprising given that the scheme generates 213 outbound movements in the AM peak.

The Chalker's Corner (CC) scheme only increases the left turn (LT) capacity by adding a flare and (somehow) increasing the green time by 7 seconds – this almost doubles sat flow and solves the capacity issue though the LT flow increases by a further 64 vehicles as a result compared to development scenario,

CC does not increase RT sat flow except for extra green so the flow only increases by a further 4 vehicles in the AM peak.

It seems rather convenient that the development itself only adds 21 total vehicles on LRR approach compared to 2031 Base – presumably a SATURN reassignment effect.

Also convenient that the RT flow hardly increases (324 with CC compared to 293 at present) when this movement cannot be improved without taking capacity out of the A316.

As stated previously we should request a sensitivity test of the development traffic just added to the 2031 base loads with no reassignment - with and without CC.

Further confirms our suspicions that the constrained nature of the site in terms of number of vehicle accesses and constraints on all of these routes is being hidden by the methodology used.

We have looked at school trip generation – 105 in/85 out in am peak by vehicle. The TA refers to using Travel Plan targets including Richmond Park Academy (RPA) but Appendix W comprises only an e-mail exchange with the Council officer. RPA does not have a Travel Plan and if these are targets then it is highly questionable that they can be achieved. Appendix V refers to most pupils walking or cycling, which is questionable given the barriers created by the river and railway.

The figures for Christ's School are probably not representative given proximity to 4 bus services but even here 770 pupils and 90 staff generate 150 inbound vehicle trips in the am peak – even if this is a target it seems to not have been applied to Stag. Again, I would argue that the specific constraints of the site will probably result in greater car use than has been estimated. Incidentally, the latest NTS gives a 23% car mode share for secondary schools.

Public Transport: We do not see what the strategy is for dispersing 1,250 school pupils in a very short space of time given that many will disperse east and west along the South Circular. An avenue most important to explore is the public realm and walk routes around the school eg Sheen Lane as these do not seem suitable.

PERS assessment – this is not very revealing with few links flagged up as amber. We are surprised that TfL has not requested a Pedestrian Comfort Level (PCL) assessment as per its guidelines. We are sure that this would show footways adjacent to the site struggling to meet the required Level B. There is no assessment in the TA of how Lower Richmond Road and Mortlake High Street would cope with 1,250 school children being dispersed in a short space of time. We strongly suspect that the crossings will struggle.

PERS does highlight some issues along Sheen Lane, especially south of the railway line where it notes footway restrictions due to shops and other clutter. I think this is highly relevant and should be flagged given likely future demand.

The TA is very poor in terms of explaining trip numbers – it does show 40 additional vehicles southbound on Sheen Lane in the am peak (TN16 – Table 4.2) which is significant in the context of the NR risk assessment.

Although these comments are focused more on pedestrians and though numbers are given for the pm peak the assessment only considers the am peak we think this is misleading as some of the worst problems along the South Circular are c. 4pm when most schools discharge.

The development attracts 1,619 person trips in the am peak – of these 607 are assessed to be pedestrians and 571 are bus trips, though none of the latter are assumed to cross the railway line.

The level crossing assessment concludes that only 75 out of 607 inbound walk trips cross the railway line of which 48 are school children – these split about 50/50 between grade and footbridge.

We find this highly implausible. There are 1,162 educational trips in the am peak inbound – 59% of school children are assessed to live south of the railway line (686). Their only option is to walk as neither the 209 nor 419 crosses the railway line. PBA suggests that these pupils use a number of crossings including the St Leonards Road and Glendower Ave footbridges. We find this difficult to believe given that the access routes to these footbridges are via residential streets and are convoluted – neither provides a direct route to the school.

We believe that in both the morning and evening children will gravitate towards Sheen Lane due to its density of newsagents, bread shops and cafes. They will also head to the chicken shop at the bottom of Richmond Park Avenue which is very popular. The same applies to bus trips – children will not board a 209 even if serving the site – they will head down Sheen Lane and then travel to Hammersmith or Richmond via the 33 route.

The other walk trips may have been similarly mis-assigned.

The precise walk trip distributions are not given in the TA so it is difficult to be precise but we think the numbers using Sheen Lane have been grossly under-estimated. The increase in walk trips northbound should be c. 300-400 rather than the 75 estimated and this would seriously impact on the footbridge capacity, which is marginal, and compromise safety on the road crossing. As a footnote, we doubt that PBA has considered the number of cyclists using the footbridge and its serious impact on capacity.

Regarding the Station Capacity Assessment it appears that PBA have ignored edge effects, especially on the footbridge and on the station platform and not discounted the seating or shelter as they should.

Chapter 5 Transport Appendix 5 - Letter to Zac Goldsmith, MP from MBCG

Mortlake Brewery Community Group

9th January 2018

Zac Goldsmith MP

House of Commons

Westminster

London SW1

Dear Mr Goldsmith,

RE : Sheen Lane Level Crossing and Chalker's Corner

We have received copies of both Network Rail's (NR) letter to you of 26th October and Dartmouth Capital Advisors' (DCA) letter of the 8th December both on the subject of the Sheen Lane level crossing.

Our group (Mortlake Brewery Community Group - MBCG) considers that the arguments expressed in DCA's letter seriously understate the likely impact of the latest Stag Brewery proposals on the level crossing.

Network Rail control this level crossing along with 5 others in the area from its base in Wimbledon we understand it is down to just one controller to monitor all these sites and that this system of control cannot always spot hazards on the tracks once the barriers are down. Our own video surveillance demonstrates the disturbingly high frequency of near miss incidents occurring at the crossing, some of which may not and could not have been spotted by NR. Our video evidence also shows just how the near miss incidents occur when vehicular and pedestrian congestion builds up.

With more demand for vehicles and an increase in vulnerable road users (pedestrians, school children and cyclists) it follows logically that the frequency of these incidents will increase and the risks of greater numbers of reportable accidents will rise broadly in proportion.

With regard to the pedestrian capacity across the railway, the nature of the problem is clear from our video evidence. At quiet times, the marked width for pedestrians over the tracks is barely adequate for passing other pedestrians with or without pushchairs being present. At times of congestion, both in peak periods and during the long barrier closure times, the steep footbridge is the choice of last resort for all but the fit, unencumbered and most impatient pedestrians and cyclists. In theory, the footbridge capacity itself is there but, as provided, it barely contributes to the pressures at the crossing other than for some station users.

Pedestrian Demand

Our own estimates of increased movement demand due to the current Stag brewery proposals are shown below. The range in overall demand stems from the case studies of similar developments elsewhere in London. The actual demand over the crossing depends on the origins and destinations of the users of the development. On this point we note that there are two other footbridges over the railway within 500 metres of Sheen Lane, however, research into schools transport in London and elsewhere shows that secondary age pupils prefer to walk in social groups where possible and are content with taking even longer routes to stay with their friends and pass by shops. For pupils needing

to cross the railway, Sheen Lane is likely to be the predominant choice particularly as a surface crossing is still available.

Current and Future Movement Demand at the Level Crossing – MBCG Provisional Forecasts

Our forecast of overall vehicle generation is, higher than that revealed by the developer's advisors as is the proportion of total traffic likely to use Sheen Lane. The "headline" increases in demand above the 2017 measured flows around the level crossing between 8am and 9am are forecast as follows:

- Pedestrians crossing the tracks at ground level and via the station footbridge – over 50% increase
- Cyclists crossing the tracks at ground level and via the station footbridge - over 65% increase
- Vehicles crossing the tracks – over 33% increase

It can be seen that the potential order of increased movement demand around the level crossing is highly significant and hence concerning. This level of demand is dictated by the proposed combination of the high residential content and the large secondary school. Reversion to the original development brief for the Stag site with the local primary school located there would mitigate this problem.

We appreciate DCA's offer to support Network Rail in finding a solution. Our view is that the responsibility for funding any solution here should rest jointly with the Stag site developer (for the housing and commercial development impacts), LBRuT/ESFA (given the large school's impact), any other developer of the station environs and Network Rail. A contribution may also be sought from the private consortium preparing the Heathrow Southern Railway Ltd. proposal.

A number of potential solutions may be envisaged but controversial or very costly interventions such as road closures, rail or road bridges are unlikely candidates. The provision of a ramped footbridge parallel to Sheen Lane, for example, may turn out to be both affordable, attractive and accessible than the current bridge but still subject to development and design challenges.

Traffic Flows and Speeds

We note that traffic modelling tests are still on- going with PBA (Transport advisers) and TfL after many, many months. Our Group has been promised a further meeting with PBA but this has yet to take place. We have been advised by TfL that a meeting would be appropriate with themselves, the developer, the Council and our Group.

More capacity provided at the Lower Richmond Road approach to the strategic junction of Chalker's Corner as is currently proposed, rather than on the main radial route (the A 316), will inevitably attract additional extraneous traffic in both peak and non-peak time periods on to the secondary/local road network (Mortlake High Street, Barnes Terrace, Sheen Lane and White Hart Lane. Without this intervention, the new traffic generated in the peak periods by the Stag proposals would actually serve as a deterrent to extraneous traffic using these local roads.

The high-level policy objectives enshrined into local planning here and in Richmond and London as a whole include the encouragement of sustainable transport solutions when development occurs. This suggests strongly that a partial "improvement" of local road traffic capacity to and from Chalker's Corner runs counter to these policy objectives. Any highways mitigation monies collectable to address this should be directed towards providing a strategic solution focusing on the A316 and possibly the A 205 routes. The opportunity to improve overall accessibility in the area should be taken by focusing entirely on increasing public transport services and improving conditions for cyclists and pedestrians.

I hope that you will see the need for an urgent discussion with the Council, the developer, TfL and Network Rail to seek to resolve the emerging problems here.

Yours sincerely,

Howard Potter Transport Planning Advisor, MBCG

and

Robert Orr Ewing, Chairman, MBCG

Copies to:

Aeneas Tole, Network Rail (for Stewart Firth)

Chapter 7 Education Appendix 1 – Glossary

Term	Description
2015 Cabinet Papers	The minutes relating to and other documents (including the Richmond Council Revised School Place Planning Strategy 2015-2024) prepared for the LBRuT Cabinet meeting on 15th October 2015
3G Pitch	The proposed '3G' artificial full-sized playing field shown in the Plans occupying part of the two grass playing fields
APB	The adopted planning brief for the Site from 2011, a supplementary planning document
APB Scale and Uses Plan	The proposed design for the Site, including maximum acceptable scale of buildings, set out at Appendix 1 to the APB
Applicant	Reselton Properties Limited
Applications	Each of the following applications to LBRuT: 1. 18/0547/FUL (Main site – detailed and outline) http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/0547/FUL 2. 18/0548/FUL (Secondary school) http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/0548/FUL 3. 18/0549/FUL (Chalker's Corner works) http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/0549/FUL
AQMA	An 'Air Quality Management Area', designated pursuant to Part IV of the Environment Act 1995
Borough, or LBRuT	The London Borough of Richmond upon Thames
Development Masterplan	LBRuT's current 'Adopted Development Master Plan'
Education Act	Unless otherwise stated, the Education Act 1996
EIA	The Environmental Impact Assessment relating to the Applications (including its annexures), required pursuant to The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011
Local Plan	The local plan, in its current form on the Borough website pending adoption, further revision and replacement, which will supersede the Development Masterplan
MBCG	The Mortlake Brewery Community Group
MUGA	The proposed 'Multi-Use Games Area' shown in the Plans occupying part of the two grass playing fields
NPPF	The National Planning Policy Framework, a material consideration in relation to planning applications pursuant to Sections 19(2)(a) and 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990
OOLTI	'Other Land of Outstanding Townscape Importance', a designation afforded by the Development Masterplan and the draft Local Plan
Plans	The detailed proposals for the Site set out in the Applications to which these comments relate.
Secondary School	The secondary school the subject of Application 18/0548/FUL
Site	The Stag Brewery development site, identified as SA24 in the Local Plan
TCPA	Town and Country Planning Act 1990