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24.07.2019

Dear Sirs,

Stag Brewery Mortlake Ref Applications 18/0547/FUL 18/0548/FUL 18/0549/FUL

We write in formal response to the recent submissions (notified on 24th June), related to the redevelopment of the Former Stag Brewery site, Mortlake. The applications listed above contained numerous report addendum information, revised drawings, revised area schedules and associated documentation.

On review this submission information largely contains justification to the original planning applications, further information in response to earlier consultations with your officers, the GLA and statutory consultees, substituted drawings, and certain resultant design revisions to the proposals. The submission information does not however address the core concerns highlighted by the community via the numerous objections to specific elements of the design proposals in the three separate planning applications.

We note that the number of residential units has been reduced by 4 dwellings, the mix of units has been modified and the upper level limit of floor areas of some of the 'commercial' land uses have been adjusted. The applicant proposes that the changes are minor and by inference do not represent sufficient reason for re-application. This is of course for the planning authority to review particularly in relation to 'base line' criteria utilised for the large number of technical reports and in view of the large number of design changes which are detailed in the new documentation.

In broad terms the primary objections we made to the original applications (May 2018), remain unchanged as these have either not been addressed at all, nor addressed to any meaningful degree. We therefore respond to the latest application information as follows. For ease of reference we have referred in the first section of our response to the Development Proposals & Design in the same order as covered in our original letter of objections using the headings in the Gerald Eve Town Planning Statement.

We also note that the Design & Access Statement Addendum covers responses to detailed comments from your officers and the GLA. These largely relate to the architectural design, to comments related to each of the Blocks for which Detailed Consent is sought (1-12), and certain 'tightening up' of the Design Codes for the Outline elements in the west zone of the site. We also comment on some of these aspects in our response. Our headline comments and objections on all three applications are set out below in an Executive Summary and we then deal with each application in turn.

## 1.0 Executive Summary of Objections related to all three Applications

- *This proposed development represents a very significant over-development of the site in what is recognised as an essentially low-scale, low density sub-urban setting.*
- *In many areas the proposals do not comply with the Adopted Planning Brief for the site in terms of height, scale and massing. This is particularly so in the north west area of the site where the blocks are very high and over-dominating in scale. In the eastern sections of the site several of the blocks are over-bearing in relation to the riverside, towpath and High St. Clearly new housing is required in London, and Richmond needs to provide its share but the scheme is too dense.*
- *The loss of the existing sports fields is in direct contravention of the Planning Brief and is wholly unacceptable, with its hard all-weather multi-use games area ( MUGA), surfaces, fencing and floodlighting. The protected sports fields are designated as ' Other Open Land of Townscape Importance (OOLTI), and should be retained for community use. The fields also represent important visual Townscape resource for local residents and the wider community. The space is not re-provisioned in the scheme design proposals by any stretch of the imagination.*
- *Genuine open amenity space provided in the scheme proposals (circa 25%), is lower than the base provision in the Planning Brief ( circa 28% - Sports Fields and Green Link).*
- *This site is uniquely and significantly constrained by the river Thames to the north and the level crossings on the Richmond/Waterloo line. This places huge pressure on Sheen Lane and the only other access routes of Mortlake High Street and the Lower Richmond Rd. The proposed cumulative scale of the development and high parking provisions combined with general day-to-day access traffic will create unbearable congestion on the already congested roads and local infrastructure.*
- *The introduction of a huge secondary school adds to the local transportation pressures and will exacerbate safety risks at the Mortlake level crossing.*
- *We have seen no evidence or documented justification for a secondary school with sixth form. This issue is highlighted in the GLA's Stage 1 Report and the community have had no detail presented to support this aspect of the scheme. Expansion of existing local secondary schools is deliverable and funding mechanisms are available to the Council via the developer as outlined in April 2019 Guidance from the Department of Education.*
- *The Viability Assessment appears unrealistic, only supporting a very low affordable housing allocation. Affordable provisions should also be spread over the whole site and not concentrated in one area/block or zone.*
- *The Chalker's Corner proposals, required to mitigate against the vast scale of the development proposals, will simply attract more traffic. The road works, loss of mature trees and loss of residents' external space is wholly unacceptable. The proposed works will very adversely affect the local residents in Chertsey Court in terms of visual intrusion, noise, pollution and loss of OOLTI protected land. This aspect of the scheme is totally disrespectful to existing residents living around the proposed junction. Reduction of the overall development scale could eliminate the need for such expensive (over £8.0m), and hugely disruptive works and, thus facilitating additional monies to aid the affordable housing allocations. Likewise a reduction in parking provisions, given the proximity of Mortlake Station would further negate the need for work at Chalker's Corner and could vastly reduce the basement construction costs, currently indicated at £78m, which too would re-calibrate the Viability figures to improve the affordable housing provisions in the scheme.*

In summary the latest changes and addendum information submitted by the Applicant make no substantive response to major concerns about the proposed development within the three planning applications. The proposals ought to be scaled down significantly in quantum and content, parking reduced, sports fields retained, height/massing reduced in key areas, and any future secondary school needs satisfied by expansion on existing school sites.

## 2.0 Summary of Comments & Objections - Application 'A' - 18/0547/FUL

### 2.1 Section 10 - Town Planning Statement - Planning Considerations - Proposed Land Uses.

- Commercial Land Uses - We note that Application 'A' contains a broad mix of land uses but as a result of comments from your officers that mix and quantum of floor areas has been modified with changes to the upper limits on the Flexible Commercial uses and Office floor space. We have no issue with these adjustments but remain unconvinced about the broad distribution of particularly the flexible space. Our previous objections still apply, namely;
  - We maintain that the flexible space is too dissipated around the site and may result in vacant, boarded up space at ground level. This is particularly so along the towpath in Blocks 8/10/11/12. Has the quantum of space been tested in terms of local market demand?
  - Almost all of the flexible space is very shallow in depth and potentially un-lettable to target operators such as restaurants, bars, cafes and other retail type uses.
  - We maintain that the flexible space should concentrate around the Green Link and Malting Plaza to complement the proposed Cinema and Hotel uses in Blocks 1 & 5/6, and thus establish a meaningful "Heart" for Mortlake as envisaged in the Adopted Planning Brief.
- Housing and Affordable Provisions - no further mention is made in the latest submission documents related to a viability review post any possible consent. We are not party to, nor aware of any further negotiations between the Applicant and the Authorities in relation to viability assessments, future testing or indeed the distribution of affordable units on the west and east zones of the site. Non of this is covered in the latest submission information. We continue therefore to object to the Applicant's proposal that, " there should be no requirement for any form of viability review after grant of planning submission." We also feel strongly that affordable units should be provided throughout a phased sequence across the whole site and the allocation should be increased above the figure last quoted - 17%.
- Offices - We welcome the increase in office provisions as proposed in our earlier responses. This will assist a balanced spread of uses and opportunities for smaller businesses. However, the ground floor fenestration of any such uses should animate the Mortlake High St streetscape more successfully than illustrated in the current designs. See Adopted planning Brief - Appendix 1 - "Active frontages facing High Street and towpath." - This objective also applies to the Flexible Use floor space and the desire to re-invigorate the High Street - Item 5.14 of the Brief.
- New Cinema - concerns about viability of this use remain given the proximity of existing screens in Barnes, Richmond, Putney and Kingston. Concerns about traffic generation both night/day time remain together with the ill-defined parking provision. Traffic assessments should be reviewed in detail related to this aspect of the proposals as they are in-adequately covered in the transport assessments submitted to date.
- Community Space - despite putting forward alternative layouts to the Applicant which create more flexible space in the ground floor of the Maltings, whilst still providing high quality residential space above, the Applicant continues to retain the original layout and has ignored our perfectly reasonable design. The Community space is surely a key component of "putting the heart back into Mortlake." We object to the current layout and urge the Council to have this aspect of the scheme re-designed or otherwise relocated into space more appropriate for a wide range of community uses.
- Boathouse, Block 9 - We note the design of Block 9 has been modified to take account of comments from the Environment Agency and perhaps others. Although we strongly support the use of the ground floor for a boathouse the plans show very restricted space for such facilities and we would question whether the internal space provided is indeed viable.

## 2.2 Section 12 Town Planning Statement - Planning Considerations - Residential Design

We remain supportive of a sustainable re-development of the Stag site and providing a good mix of residential dwellings to satisfy needs for new homes, but certainly not at any cost.

The overall mix of floor areas and numbers of residential units has changed only marginally with a reduction of just 4 residential units resulting from refinements to the mix and floor layouts. These are in response to criticisms of the quality of habitable space in some of the units and the compressed external amenity areas.

All of the very detailed analysis and comments we made to the original planning submission in Section 12 of our formal Response still apply and as such we still strongly object to the quantum of residential units proposed in the scheme, especially when the cumulative effect of the very large secondary school and other commercial uses are taken into consideration.

We recognise that the pressures to create significant proportions of affordable units could create a pressure to elevate residential site densities but the draft London Plan does strongly advise that densities need to take into consideration 'local context and character and public transport capacity' (1.3.51). It also emphasises that 'other more local or site specific factors may also be given appropriate weight, taking into account the particular characteristics of a proposed development and its impact on the surrounding area.' (1.3.52). In other words the draft Plan shifts from the former more formulaic method of assessing density to a more balanced approach taking into due consideration location and local environment. We reiterate that ;

- The the site is hugely constrained by the River Thames to the north
- Is further constrained by the series of level crossings to the south
- The local road infrastructure is already hugely congested at peak times and indeed throughout the day
- The Richmond to Waterloo rail service is already at capacity in terms of platform/carriage sizes and the Mortlake and Sheen station is packed at peak commuting time. Bus routes serving the site are extremely limited.
- Mortlake is without question sub-urban in character whilst the proposals are quite clearly urban in terms of density, scale and massing.

London needs to optimise re-development opportunities and Richmond needs to play its part. However, the current proposals clearly seek to maximise density, whilst providing sub-optimal land allocation for the secondary school, trashing protected OOLTI sports fields and prevailing upon the health and amenity of the local residents and Chertsey Court tenants with the proposed Chalker's Corner and Lower Richmond Road road works.

The Applicant has quoted that the proposals represent a site density of 138 units/ha. We do not agree with this statement for several reasons. Firstly their figure excludes the Nursing and Care Home (80 ensuite units /associated facilities). This part of the building blocks in the west zone is classed as Residential Use C2 with the majority of the other Residential Uses classed C3. This C2 element still contributes to the overall density. Secondly it is not clear whether the Applicant has used the larger site area of 9.25ha which would be inappropriate as this is not the true site as it includes Williams Lane, Ship Lane, the towpath/slipways and the link to Mortlake Green. Thirdly the Adopted Planning Brief designated two areas as 'non-developable' - The existing OOLTI sports fields and the proposed new Green Link. Strictly speaking these areas ought to be deducted for the purposes of the density calculations.

We refer you to the density figures we included in our May 2018 response - Section 12. which goes into great detail to illustrate quite clearly that the site is vastly over-developed. This is starkly demonstrated by our analysis which considers the local context of the land parcels within Mortlake

formed by local roads and the railway lines. This reveals densities in these parcels which range between 53 units/ha and a maximum of 90 units/ha creating an average of just 70 units/ha.

We have re-checked the proposed site density taking into account the proportion of other commercial land uses in the east zone and also excluding the school. If one includes the amenity space in the west zone which is the residue of the existing sports fields and the Green Link in the east zone then we calculate the proposed densities as follows;

West Zone - 136 units/ha  
East Zone - 182 units/ha

If however one excludes the land which was intended to be non-developable - residue of sports fields and Green Link then these figures increase as follows;

West Zone - 151 units/ha  
East Zone - 225 units/ha

The Residential Density Matrix - Table 3.2 in the current London Plan still acts as a useful guide to site densities in differing circumstances of location and PTAL rating.

Even if one applied the higher 'urban' category of the table and the mid range of the PTAL 2 to 3 for this site ( Currently classed as 1/2 by TfL), then the average density would equate to 120 units/ha.

Clearly however one looks at this aspect the site is over-developed and too dense, especially when one considers the local environment and proximity of three Conservation Areas and buildings of heritage asset/ Listing status.

We would argue that this site is sub-urban within the current Matrix, and if one applied the highest category in PTAL 2/3 then the density ought to be 95 units/ha MAXIMUM.

A clear demonstration of the over-development of the site is revealed via the Applicant's scale model which unequivocally highlights the density, scale and massing of the proposed design which is so at odds with the suburban grain of the local townscape, context and environment.

### *2.3 Housing Quality - Design Standards*

Our previous response document highlighted that the site density results in inadequate levels of privacy for the residential units caused by the proximity of blocks to one another. In some cases those blocks remain very close to one another, 13.5m along the new Thames Street and 10.0 m & 15m in some other cases. The applicant has adjusted the mix and internal designs and has submitted justification of the layouts in terms of privacy and levels of daylight/sunlight. The scheme however still has a large proportion of units which do not comply with design guidance in this respect and several units are single aspect, north facing, and overlooking amenity space which will be almost permanently in shadow due to the height and layout of the blocks.

This is particularly the case to the eastern end of the east zone where both the layout and heights of the blocks (8/9/10/11/12), create a very compacted arrangement. It is clear that the planning officers and the GLA have challenged the quality of the design in this respect but we maintain that the root cause is the sheer density of the scheme and compacted nature of the layout.

### *2.4 Section 13 Planing Considerations - Design and Layout*

- The layout for the blocks submitted in Detail in the east zone does create three primary routes/corridors which generate permeability to the riverside and towpath, however the layout remains very urban in character in an otherwise suburban environment of largely 2/3 storey terraced dwellings. The layout also creates large zones of overshadowing in the amenity areas formed between the blocks, the result of both layout and proposed building heights. It seems perfectly feasible to increase the width of Thames Street to relieve the massing of the primary

east/west route and by complying with height constraints set out in the Adopted Planning Brief. ( We cover building heights specifically in a later section of this response).

- Blocks 8/11/12 still dominate the riverside and towpath and contribute to creating this compressed, congested and more urban character of the layout in the east zone of the site.
- We note that Dartmouth have also been responsible for the development of the Teddington Studios site which is now virtually completed on a similar Thameside location, suburban type setting, in the Richmond Borough. Here blocks of 4/5, 7 and 6 floors are set back from the riverside towpath by between 22/25.0m and 17.0m at minimum. The space between all blocks is consistently over 20.0m, and greater in places, but with only one central block of 7 floors. Clearly the circumstances differ but we strongly feel that on the Stag site the more urban layout and massing is unsuccessful and unacceptable.
- The layout of Blocks 18/19 remains of major concern. Although this area of the site and the blocks within it are submitted in Outline with proposed Design Codes to regulate their individual detailed design in the future they remain very large in scale and layout. They dwarf the scale of existing adjacent dwellings on Williams Lane and in Wadham Mews and are clearly incompatible with the scale and layout of the existing historic buildings on the riverside. The latest versions of the Design Codes indicate ways to break up the scale and monotony of the elevations/massing but this misses the point. The blocks ought to be smaller in scale, allow greater daylight/sunlight into the central amenity area and drop in height to comply with the Adopted Planning Brief.
- The design of Blocks 5&10 still does little to enliven the High Street. Some new openings have been formed in the upper reveals of Block 5 but the ground floor streetscape at pedestrian level remains in its current form with small openings. We support the retention of this historic building on the High Street but strongly recommend that further animation is created with carefully inserted openings to reveal animated uses within. At present the design misses a great opportunity to animate the High Street, a prime objective of the redevelopment, the Planning Brief and to re-energise Mortlake. The emphasis on the new Thames Street seems to prevail over the High Street.
- Block 10 is still very unsatisfactory with the ramp and rather dead facade at ground level facing the High Street. The Applicant had agreed to adjust plans to address this but no revisions have been made. The D&AS Addendum merely states that due to technical issues it is not possible to reposition the ramp. The small residential scheme previously consented on the former Charlie Butler site manages to successfully conceal its basement parking ramp off the High Street to great effect. Clearly the basement car park on the east zone of the Stag site contains a larger number of cars than this example but by reconsidering the design in this area of the site it is possible to remove the unsightly ramp yet respect technical constraints of ramp gradients and vehicle tracking radii. The Applicant's only suggestion to resolve the current criticisms is to blank out some of the ground floor openings and cover with graphics. This "wallpapers" a defective design which should be creatively addressed.
- Concern remains that some external courtyard spaces may become or are indeed intended to be 'privatised'. This is unacceptable and conditions should ensure public access to ensure true permeability as set out in the Planning Brief.
- On closer inspection it seems that Blocks 13/17/21 appear to be extremely close to the west edge of Ship Lane which is lined by very large mature trees covered by a blanket TPO of existing trees on the site. It is vital that this avenue of trees is not put at risk and an agreed building line needs to be set to ensure their future health and survival.
- The same point applies to the siting of the school on the north west corner of the building footprint where several existing mature trees, again TPO'd, seem to be at risk. It ought to be possible to retain these trees yet augment them with the more formal avenue of trees proposed on the west face of the school.
- We maintain that the design does not meet the objectives of the strategic vision of the Local Plan (July 2018), as it does not protect the local character and contravenes Policies LP1,LP2,LP3 and LP4. It also does not take into account Section 12 of the revised NPPF ( July 2018 and updated February 2019) which places great emphasis on the importance of good

design in achieving sustainable development and making development acceptable to local communities. Applying the principles of the EH/CABE Building in Context Toolkit (2001) we maintain the design proposals fail in taking into account several of the eight principles namely, Principles 3/4/5/6.

## 2.5 Building Heights

Many of the comments above related to Design and Layout are a direct consequence of the proposed building heights within the scheme. On inspection it seems none of the objections to certain specific building heights have been addressed in the new submission documents and drawings. Indeed the 8 storey cupola features on Blocks 2/7 have expanded in prominence and exceed the maximum height constraint imposed in the Adopted Planning Brief.

The proposed building heights in turn contribute to the level of site density which we challenge and maintain is inappropriate in terms of the local context, general pattern and grain of the Victorian and Edwardian townscape, relationship to the three Conservation Areas, views, vistas and heritage assets. Our previous response document to the original application still applies with the main points as follows;

- The heights of Blocks 18/19 -(4/5/6 floors) are totally unacceptable and contravene the Adopted Planning Brief. Here block heights should be between 1/3 floors maximum.
- The same point applies to the northern ends of Blocks 16/17
- The cupola features on Blocks 2/7 have become more dominant and create a rather aggressive and unbalanced aspect of the design. These rather dominate the vista towards the river and detract from the view to the retained Malting building. It is clear from the Addendum D&AS that officers have questioned both the cupola design and the awkwardness of the mansard roofscape and roof level set-backs. We concur. Rather than create a recessive, more calming termination to the blocks these features seem to emphasise height and massing.
- Proposed building heights create large areas of external amenity area in shadow. Some for much of the year.
- Some of the townhouses in Blocks 20/21 still adversely affect the existing residents on Thames Bankside. The D&AS Addendum states that the Design Codes will ensure no windows will affect the privacy of the existing residents. This does not address the relationship of these blocks in terms of height, scale and massing at the east end of Block 20 and west end of Block 21.
- Building heights to the edges of the east zone and adjacent the towpath/Mortlake High Street still contravene the Planning Brief. This is despite officer comments in support of community concerns. The Applicant's response in the original D&AS is very defensive in nature and unconvincing.
- The Council refused consent for 5 floors on the Boat Race House scheme next to Bulls Alley. A revised lower design with the upper floor arranged within the roofspace was subsequently approved and is now built. Building 9 is 5 floors in part and set above the raised flood defence. Similarly the former Charlie Butler site was approved with 3 main floors and a setback upper floor. These decisions respected the local context and suburban scale of the local environment. Block 9 should be reduced to 4 floors to relate more acceptably with Boat Race House and comply with the Planning Brief. (Item 5.31). Likewise Block 10 should be a maximum of 4 floors for the same reasons.
- The long elevation illustrating the whole of the towpath and riverside frontage of the east zone of the site (Blocks 4/7/8/11/12/9), clearly shows how the predominant 7 storey skyline is overbearing and subsumes the Maltings building. This contravenes several aspects of the Planning Brief. The minor setbacks on the northern ends of some of these blocks does little if anything to alleviate matters. The Appendix 1 to the Planning Brief does indicate a maximum height of 7 floors in areas of the east zone but this does not advocate a 'blanket treatment'. Clauses 5.25, 5.30 & 5.31 are important directives to respect the location and setting and to reduce height at the fringes of the site adjacent the towpath and High Street.

- We continue to disagree with section 16.33 of the original Townscape and Views summary in the Town Planning Statement. The Maltings and the massing of six new building blocks along the river frontage creates a very dominating arrangement of massing and built form when viewed from Chiswick Bridge, the towpath, the River and from the long views from the east/Barnes Bridge. The Malting, despite being a large robust building is certainly lost in the proposed riverside tableau. The latest submissions do nothing to address previous objections and comments.
- Viewpoints included in the Townscape Visual Impact Assessment ( Viewpoints 4 to 6) clearly illustrate the excessive density of the proposals, creating a wall-like development which is entirely inappropriate to an appreciation of the riverside setting of the Mortlake Conservation Area and the Grade II listed buildings/ locally listed Ship Inn within this Area.

## *2.6 Visual Appearance*

Again our original comments to the Application still apply.

- Riverside mansion blocks, one of the typologies proposed on the riverside locations, are generally found in central London and more urban locations such as Hammersmith and Chelsea. Warehouses have by nature tended to be on the riverside. The siting of these two types of blocks are thus at odds with the normal circumstances in London. The new documents illustrate design precedents and the revised Design Codes illustrate buildings or townscape context. Some of these examples are either inappropriate applications for this location or are not reflected in the proposals.
- The Cinema design still looks at odds with the overall design and particularly in its relationship to its neighbour building The Jolly Gardeners, which is a building of townscape merit.
- The gable ends and upper storeys/mansards of the blocks create a rather aggressive skyline and tend to accentuate the height of the blocks.

## *2.7 Section 14 - Public Realm, Landscaping and Design of Open Spaces*

Once again, and because the scheme has remained largely unchanged, our original comments to the Application still apply.

- The Planning Brief very clearly defines two non-developable Open Space areas, the existing sports fields and the new Green Link. Together these create 2.439ha (6.0 acres) which represents 28.30% of the total Stag landholdings of 8.62ha (21.20 acres) - The Application 'A' site area is quoted as 9.25ha but this includes Williams Lane, Ship Lane, towpath and slipway areas and the link to Mortlake Green.
- Our calculations confirm that the design proposals create only 2.14ha (5.287 acres), of genuine green open space which is just 25% of the site. Less than the 'baseline' provision in the Planning Brief - i.e: the retained sports fields and Green Link.
- The Applicant quotes that they provide 50% so called OOLTI open space. This is quite clearly erroneous on two counts. Firstly this has included the roads and access routes, and although some are tree lined they certainly do not count as green space as they are vehicular routes for general access and circulation. Secondly these green areas between blocks can hardly be defined as new OOLTI. Even the Green Link has hard access for emergency vehicles and is crossed by the new Thames Street. The green open space behind Blocks 20/21 are private gardens.
- The Adopted Planning Brief requires the retention of the existing sports fields. A small remnant only is left after the siting of the secondary school and the safeguarded area for TfL. The Local Plan re-iterates that the Adopted Planning Brief for the Stag Brewery applies to redevelopment proposals for the site. The Application contravenes the Brief.



- The Local Plan makes reference to potential re-provisioning of OOLTI land in certain circumstances. We strongly maintain that the design proposals in no way re-provision the loss of the OOLTI as no new open areas are "equivalent or improved" in terms of "quantum, quality, and openness." The proposal does not comply with policy LP 14.
- The Addendum information includes diagrams and data related to daylight/sunlight. These still clearly indicate many areas of open space which are in considerable shadow when assessed against BRE guidelines. The percentage of sunlit area in some spaces are as low as 9.3% and with many well below 50%. This is unacceptable in terms of design quality and is a direct result of a very dense layout, massing and height.
- We welcome the inclusion of the Green Link but point out that it is much narrower than originally identified in Appendix 1 of the Planning Brief with the aim of creating a generous connection between Mortlake Green and the Thames and the Riverside. The applicant has suggested that the size and area of the Green Link is not defined in the Brief. However they do conveniently and with some measure of duplicity quote the area of the primary school as defined on the same Appendix 1 plan.
- The designation of the existing sports fields as OOLTI recognises the contribution this space makes to the local area both as recreation space but also in terms of townscape and visual amenity for the local community and for local residents who fringe the fields to the north, west and south. As proposed this important protected space will:
  - be covered in part by the large secondary school
  - be covered largely by a MUGA with 4.5m high metal fencings and floodlighting
  - involve the loss of existing TPO'd trees and existing bird/bat habitat
  - involve part of the fields being earmarked for future TfL use for bus facilities
  - involve the loss of natural grass pitches and potential for cricket
  - involve the loss of biodiversity and CO2 absorption and bird foraging

We will deal with these issues further in the responses related to the secondary school but continue to object to the loss of these protected sports fields as this loss contravenes the London Plan and Richmond Planning Policy nor is compliant with the SBPB.

### 3.0 Summary of Comments and Objections - Application 'B' - 18/0548/FUL Secondary School

As officers will be aware from meetings our Group has held with the Leader of the Council, AfC and the DfE there remain serious questions regarding the justification for a new secondary school at the Stag site.

The GLA in their Stage 1 Report called for the Council to present a 'robust and evidence based' case for the secondary school. We are not aware of any such case being presented either as part of the Application or presented to the community. We make the following comments related to the proposal to site a new secondary school on the site.

- Originally we were advised that a secondary school was necessary to satisfy needs in the north-east of the borough. We have questioned the data used to justify the school after having identified flaws in the figures and assumptions. The Council then changed the goal-posts with new data which included the east of the borough including the area adjacent to the Kingston boundary.

- We have pointed out that population census figures show a fall in numbers and the current bulge falls off quickly, and certainly before any new school could be built. The fall in primary school numbers is already materialising as advised by primary schools in the area. A new school could jeopardise the success of the other two local schools and we question the viability of sixth form provisions when Richmond sees a high percentage of children moving onto private education, a feature not reflected in data to support the new secondary school.
- We advocate an alternative approach to satisfy predicted need for secondary spaces which involves expansion of existing secondary schools at RPA and Christ's and the relocation of the Thomson House Primary school to this site. The former is achievable with focus from the Council. Re-location of Thomson House would accord with the Planning Brief, remove the current safety issues of primary school children concentrated close to a dangerous level crossing, and would also allow the Council and ESFA to create capital funds by redevelopment of the Thomson House split sites for residential or other appropriate uses.
- There is also a fundamental question over the decision to award The Livingstone Academy the contract for this new school. Their education model is aimed at project based learning ( 70%PBL), and skills for 21stC employment ( highly IT/technology based). There is a question as to whether this is an attractive offer to local parents/children and that this could likely lead to local take-up levels below assumptions and a much wider London catchment with accessibility and infrastructure consequences way beyond that used in baseline calculations in the Applications.
- If it were proven that a secondary school needs to be located on the Stag site it ought to be possible to locate the facilities on 8.62 ha (21.20 acres), without losing the protected OOLTI sports fields. We have always maintained this position. Sadly the developer has consistently positioned the school on the fields, and originally even included residential blocks on the same area. The school has progressively moved location but still sits on the fields with a large MUGA taking up almost all of the rest of the fields.
- The school is squeezed onto the site, and the provisions for external breakout areas for 1200 pupils is totally inadequate. Excluding the MUGA which will be at use at recreation times, the remaining open space is sub-optimal and will undoubtedly lead to pupils spilling out into local streets with safety and well-being consequences.
- We note that a full size fenced MUGA is provided in the designs and seeks to comply with Sports England technical guidelines. However, Sports England and the Council will no doubt recognise the consequences of this approach and the negative affect on local residents. If the MUGA provides the greater use calculated by the Applicant it will consequently create a significant increase in noise and will introduce floodlighting which will disturb both local residents and significantly change the character of the locality. It is highly unlikely that acoustic measures will be capable of dealing with noise, and low-spillage floodlighting will not meet technical requirements for a MUGA of this maximum size.
- We note that the recently approved scheme at Hospital Bridge Road, Twickenham - Turing House school relocation - involves a similar sized secondary school but does so with a three court MUGA of just 55.5m x 37.0m and the rest of the sports pitches are provided on grass - including cricket. Why is this not feasible therefore on the Stag site if a school is proven necessary? This could eliminate many of the negative and sub-optimal aspects of the current design. We see no evidence in the Design Evolution that such options have been even considered or tabled with Sports England. We see no reason why OOLTI and MOL designations should be treated differently if in this case it means retention of grass pitches with all the resultant advantages of retention.
- We note that a document is referred to in the D&AS Addendum information - email dated 30.April 2018 - a letter of Objections from Sports England. This formal consultee communication is not posted on the Council website for the planning applications. We ask please for a copy of this email letter, or to be notified that it is now added to the items on the website
- Durability of grass has been raised when we have suggested retention of the existing pitches. Hybrid grass pitches are a long-standing and proven technology and are used for Premier

Football pitches and training grounds, NFL, and World Cup rugby grounds. This alternative has not been investigated and again would allow cricket to be played as it was for many years when the brewery was still operating. The borough is losing cricket grounds and Sports Richmond are concerned about this erosion of facilities especially when we have just won the World Cup competition, Women's Cricket is flourishing, and the ECB is seeking to maximise the positive impact and potential this creates for the sport and our youth.

- Only 15 car parking spaces are provided in the application. This seems completely inadequate for a likely staff of between around 100 and 140 depending on the Academy staffing regime. It is hard to believe the ESFA would countenance contributions to any additional spaces being provided in the basement parking areas when construction costs are likely to be between £25,000 and £30,000.
- Technical documents quote cycle storage provisions, but this seems inadequate for a pupil population of 1200 and when cycle use should be encouraged. The Transportation Assessment allows for only 23 of the 1200 pupils arriving on cycles. This seems very low indeed. If additional spaces are provided this will further reduce the already sub-optimal informal external recreation space indicated on the site layouts. The open space provision per pupil for recreation, even taking into account the narrow strips of land to the west and north of the MUGA is just over 3.0 sqm /pupil. Other local schools have 14.0 sqm and 37.0sqm/pupil by comparison. ( 183 & 254 % more respectively)
- Technical documents state that 50% of the am peak traffic is created by the secondary school. This has contributed to the need for the proposed junction works at Chalker's Corner and on the Lower Richmond Road. This combined with traffic generated from the other land uses represents a very significant increase in traffic on an already heavily congested part of the local road network.

#### 4.0 Summary of Comments and Objections - Application 'C' - 18/0549/FUL Chalker's Corner

The works proposed at Chalker's Corner and on the Lower Richmond Road seek to mitigate against the level of traffic generated by the cumulative density of this large scale mix use development. With regard to the newly submitted material to support the applications, there are no significant changes to the development schedules that would change the previous TA submissions and still no remotely adequate measures to improve safety conditions at the level crossing given the seriously large increase in demand from pedestrians (52-68%) and cyclists ( 70%) not to mention vehicle use (15-54%).

Chalker's Corner is still not provided with any real safety improvements for cyclists. We have seen no evidence of "sign-off" from TfL in this regard. Nor have we seen any real evidence from TfL that its previous concerns over strategic modelling work done has been fully accepted. This further modelling was a requirement set out in the GLA's Stage 1 report. Widening of the Lower Richmond Road remains the wrong solution in response to the applications and the more recent Hammersmith Bridge issue just adds to the case for its re-assessment.

Again nothing in the latest submission information and documents changes our position as set out in our earlier representations. Indeed our continued assessment of the proposals and latest information has alarmed us even further particularly in relation to the impact the road works would, if implemented, have on the local context, landscape and most especially the local residents and tenants in Chertsey Court.

Furthermore Hammersmith Bridge has now closed indefinitely to vehicular traffic and this significantly changes certain base line data and assumptions contained in the applications. Early works involved in the scheme would include significant demolitions of large structures and buildings as well as continued strip-out of internal fixtures and equipment. The works would also include major excavations, first related to archaeology, and then the huge, deep excavations for

the first phases of basement structures. The new secondary school works would also commence as part of initial phasing. None of the submitted reports and technical data, construction methodology etc, take account of the new circumstances which will prevail for many years ahead, given the closure of the Bridge. Indeed the future of the Bridge and the solutions to resolve its construction failures are a complete unknown and rely on finances, currently unidentified/unavailable to resolve those structural deficiencies, if indeed technically feasible on an historic Listed structure.

Transportation assessments and baseline data/assumptions are also significantly changed therefore in terms of traffic movements until such time, and if the Bridge is re-opened. Motorist's travel patterns will have changed, added pressures on the rail routes have been evidenced, and changes to public transport (bus) services in the Hammersmith/Barnes/Mortlake/Sheen/Richmond area have changed and still further changes are planned.

The closure of the Bridge would affect early demolition and early phases of construction works but there is absolutely no certainty about timing of solutions and no fixed date for re-opening of the Bridge. It is hard to see therefore how any decision on any of the three applications can be made with such significant unknowns and changes to calculation, data and assumptions which have supported the applicant's submissions to date. Further assessments of the transport networks are required including cases with the bridge in various "modes" and also different parts of the applications coming into use at specific stages.

Notwithstanding all these new circumstances we re-iterate comments and objections raised in our May 2018 Response and add further comments and objections related to our further assessments of the Chalker's Corner proposals.

- On closer inspection of the land adjacent Chertsey Court and the surrounding landscape it is even more evident that severe harm will result from the removal of mature trees and understory landscape which would result from the proposed junction works. Currently residents in Chertsey Court are heavily screened and protected by very large, high mature trees. The screening is also created by lower level shrubs and planting, some of which is evergreen. This provides significant screening even for the highest of the residential units in the Court on the uppermost fourth level. The existing trees and vegetation provide very effective visual screening from this already busy junction. They also provide effective acoustic screening from traffic and very importantly serve to mask and absorb noxious fumes and CO<sub>2</sub> emissions from traffic.
- The designs propose a 2.0m high brick wall on the new boundary to Chertsey Court with the road alignments much closer to the residents. New tree planting is proposed but the design, layout and spacing of new planting will in never be as deep, high or dense as existing screening and the protection this currently provides. It is almost laughable that the applicant purports that there will be no increase in noise or pollution given the documented increase in traffic, greater proximity of traffic and thus noise and pollution.
- The design of the new boundary wall now proposed sections of planting on the brickwork to soften the hard intrusion of a 2.0m high imposition and respond to officer's adverse comments. This does indicate a "wallpaper" solution to a much bigger problem.
- The proposals involve the loss of further OOLTI space around the junction. This is again unacceptable and there is no evidence of re-provisioning in the applications.
- The proposed works will represent a major visual intrusion on residents on the Lower Richmond Road and even more significantly on those tenants and leaseholders in Chertsey Court. This is an intolerable proposition.
- One aspect of the proposed road works and re-alignments which appears not to have been taken into due consideration is the access and egress of existing residents feeding onto and off the Lower Richmond Road and Mortlake High Street. The increase in traffic which results from these proposals will adversely affect vehicular movements into and out of the roads located south on these routes. Traffic travelling eastwards and attempting to turn south into local streets

off these two main roads will inevitably impede the general flow and further exacerbate congestion. Contraflows westwards also wanting to turn into the development or Chertsey Court/Williams Lane off Lower Richmond Road will experience the same difficulties.. Repositioned bus stops will add to the congestion on both main roads.

## 5.0 General Issues Environmental Statement, Climate Change & Energy

We note the GLA have indicated that " further clarifications and revisions are required to the Energy Assessment to verify the carbon savings proposed and to the sustainable drainage strategy." There are several addendum reports but no Energy report.

We also note several points in the Environmental Statement - May 2019.

- 6.1 states that 3.89 ha of publicly accessible amenity space, including play areas, is provided in the scheme. We have calculated this as only 2.14ha. The tree lined streets/routes and access routes in the layout can hardly be viewed as amenity space.
- 6.4 states that the effects on air quality during construction will be "insignificant." Given the number of delivery and cart-off traffic movements with the major demolitions required, very extensive excavations and general new construction traffic this is an erroneous statement and needs to be challenged
- 6.4 also states that the proposed highway works would have a beneficial effect and would not adversely affect residents, occupants and future residents or the school. This is clearly erroneous as has been highlighted earlier.
- 6.10 states that in relation to the sports ground a "substantial portion of the open space would be available for public access." This again is misleading. Only 0.32ha of the sports fields remains of the existing total of 1.75ha. Although the school MUGA could be used by the public this will be with limited hours all in direct conflict with the aims and guidance in the Adopted Planning Brief.
- 6.12 highlights the effect of the scheme in terms of daylight/sunlight and names 7 existing buildings adjacent the site which will be adversely affected by the proposals. It also quotes "only a small number of areas showing deviations from the suggested targets" as being affected in relation to daylight/sunlight. This again is erroneous and misleading as evidenced by their own diagrams on BRE standards within the same document.

In conclusion we wish to see an exemplar scheme materialise for the Stag site and which will revitalise the area, "Putting the Heart back into Mortlake", but the scheme falls short in so many ways.

Sadly so many aspects of the three applications have significant adverse affects and negative consequences on the community and locality.

Gerald Eve's Addendum Town Planning Statement - May 2019 in Item 1.4 suggests that "amendments proposed are relatively minor — within the current context of the scheme" and that "broadly speaking positively respond to consultee comments."

We feel strongly that this is not the case and throughout the consultation process the applicant and their team have done little to address the primary concerns voiced from the outset of meetings with our Group and at the CLG sessions.

In view of the above our objections to the applications remain and we continue to recommend refusal on the grounds highlighted in this response. We urge the developer to come forward with a re-worked scheme which we can support and a sustainable, high quality design which such an important site in Richmond deserves.

Mortlake Brewery Community Group.