

**Liz & John Evans**



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13<sup>th</sup> May 2018

London Borough of Richmond upon Thames  
Environment Directorate  
Civic Centre  
44 York Street  
TWICKENHAM  
TW1 3BZ

REF: 18/0547/FUL

REF: 18/0548/FUL

REF: 18/0549/FUL

Dear Councillors and Officers,

**Response to the Three Planning Applications for the Mortlake Brewery site**

The redevelopment of the Brewery site presents a great opportunity to revitalise Mortlake. We have concerns about the current proposals, which fall into four main areas:

- The cumulative density of the site is overwhelming.
- The local infrastructure cannot accommodate the increase in traffic, nor will the associated air pollution be acceptable.
- There is no strategy for improving public transport to help alleviate the situation and, importantly, no plan to address the issues of the level-crossing
- Inadequate re-provision of the protected land - the playing fields and the Chertsey Court land.

This application and size of development needs to be viewed in the context of the physical barriers (the river Thames and the railway line) and the poor level of public transport that serves the community. These are important limiting factors that cannot be ignored.

**Overall Density of the Site**

The proposed development is too dense: there are 817 residential units (including potentially 150 care units), a 1,200 pupil secondary school and 7,121 sq m. of commercial uses (retail and office). In the context of Mortlake, the brewery site represents about 15% (9 hectares), of the area of Mortlake but an increase in the population of about 40%. This changes the very nature of the area. In particular:

- The eastern half of the site is extremely dense in layout, far exceeding the GLA's existing London Plan guidelines on development density, expressed in units/hectare (about 211 units/hectare east of Ship Lane, compared to the existing average density for Mortlake of about 70 units/hectare.)

- Individual residential blocks are very close to one another, especially the higher blocks: this creates issues of overlooking between dwellings, and significant shadowing of open spaces in the public realm. Any detrimental effect (loss of light) on existing properties, particularly in the north west of the site, will need to be further assessed. These residents will have expected to be protected by the OOLTI designation of the playing field, which is ignored by these plans.
- The proposals still exceed the height constraints in the Council's Planning Brief for the site published in 2011, especially in the north-west of the site where blocks are proposed from 3 up to 5 storeys.
- The area of land allocated to the school is not sufficient; it will provide a sub-optimal experience for pupils as there is limited space to play and circulate. If a school is to be built on this site, then it needs to have a smaller capacity or more land needs to be allocated.

The density of the site, and number of residents, workers and visitors will have a significant impact on traffic.

#### **Impact on Traffic**

In recent years, much new accommodation has been built in Mortlake and Barnes : the traffic congestion has steadily become worse. While this development was piecemeal, the impact on traffic has been cumulative. There has been little planning to accommodate this increase.

Similarly, with this development, there is no strategic approach to resolving traffic congestion .The size of this development will exacerbate an already bad situation with harmful impacts affecting all road "users" including bus passengers, pedestrians and of course people living nearby. An additional 500 car journeys are estimated to arise from this new development.

Our specific concerns are:

- There are too many parking spaces planned. In total 703 parking spaces have been allocated for residents and visitors.
- The 1,200-pupil school will generate a significant increase in traffic and movements at morning peak hours, particularly by public transport and bicycle. The traffic assessment has not adequately assessed this impact, particularly regarding pedestrians.
- The Chalker's Corner changes will not resolve the issue of increased traffic. The developer's plans include major road works at Chalker's Corner, which they say will improve traffic movements at peak hours. This is far from conclusive and may indeed simply attract further through traffic.
- The air quality on Mortlake High Street, the Lower Richmond Road, and Sheen Lane is already poor and often unacceptably bad. Extra traffic leading to slower movement, more congestion, and more idling, can only exacerbate this, with dire effects on the health of the local population.

The planning application needs to promote a much smaller increase in car usage along with improved public transportation.

## Public Transport and the Level Crossing

Your 2011 planning brief stated: "The Council must be assured that transportation and highways issues can be satisfactorily addressed through the proposals ... The consultation process identified a number of transport issues in the area which included concerns about impacts on road congestion, existing bus routes...". This planning application has not addressed these issues satisfactorily.

The proposals do not include a strategy for public transport. Public transport in this area is extremely weak compared with surrounding parts of London.

- The railway line is running at capacity, and most Mortlake services are 10-car trains, the maximum that the station can accommodate. At rush hours, trains are even now standing-room only, with significant overcrowding. The prospect of many additional passengers, generated by a new development on this scale, is frightening. Timetabling is such that there is no prospect of more trains ever stopping at Mortlake.
- Existing bus services will be inadequate to meet increased demand, particularly that which is likely to be generated by the school pupils. At present, the 209 route is under threat of a reduced service under the proposals to extend the 485 bus service. Both the 209 and the 419 are routinely delayed in traffic, even at existing volumes. Little mention is made of the 190 bus service from Richmond over Chiswick Bridge to Hammersmith and the opportunity of increasing its frequency.
- There is no plan to address the pedestrian, cyclist and vehicular risks at the Sheen Lane level crossing. Network Rail's own risk assessment of this crossing scores it highly (=bad) on both individual and collective risk and gives it the highest risk category: it is the 4<sup>th</sup> riskiest crossing on the Wessex Route. It identifies vehicle-pedestrian collision as the main risk.

The development at the Stag Brewery will increase use (vehicles and pedestrians) of this crossing at peak periods, and a significant number of the additional pedestrians will be schoolchildren. Increased traffic will lead to further delays, greater frustration and an increased likelihood of accident. Network Rail state that they are unable safely to reduce the number of minutes per hour that the barriers are down. The planning application needs to address the safety issue in conjunction with the Borough and Network Rail.

## Protection of Green Space

Mortlake has a small amount of open green space of which the brewery's playing fields represent 53% by area. The playing fields have protection under the classification of 'Other Open Land of Townscape Importance' (OOLTI). While protection is not absolute, it is not clear from the Plans how the developer will meet the criteria which allow development to occur, which are based around the 'quantum, quality and openness' of the land being removed having to be re-provided on the site. The same issue of re-provision applies to the OOLTI land lost at Chertsey Court. Narrow strips of land between tall residential blocks (shady wind-tunnels) are in no way a suitable replacement: nor is a smaller, floodlit all-weather pitch. It is inconceivable that anyone could consider such spaces as being equivalent to the field, a single large space which has never been built on.

The loss of the two grass playing fields which the Council previously indicated it would require to be retained will prejudice users (one pitch instead of two), neighbours (through floodlighting and traffic), and our ecosystems and may negatively impact flood water protection. It also fails to respect the natural beauty of Mortlake, and the introduction of fences and barriers will impair the current open aspect of the site.

#### Other Observations

1. The proposals to change the junction at **Chalker's Corner**, which offers limited and unproven transport benefit, will move the traffic closer to the residents. This will have a devastating impact on Chertsey Court residents:
  - Increased poor air quality and pollution due to increased traffic generation; it already exceeds EU pollution limits
  - Increased noise and disturbance
  - Loss of 'Other Open Land of Townscape Importance' (OOLTI) protected land contravenes planning policy
  - Loss of mature trees
2. There is no **additional health care or primary school provision**; existing services will struggle to meet this additional demand, particularly as a number will be elderly in the care units. Local GPs are already fully subscribed. The target demographic of the site (young families and the elderly) will generate significant extra demand for local healthcare facilities. The application in no way addresses this.
3. The **affordable housing provision** is just 20%, lower than the council's guidelines. It will also be delivered late in the development which may mean the provision is further reduced over time. There needs to be a higher provision which should be delivered across the building phases.
4. It is questionable whether there is local demand for a **cinema**.
5. The proposals to **transport demolition waste** and excavated soil from, and construction materials to, the site by truck on Lower Richmond Road will have a negative impact on the local residential environment. The alternative of transportation by barge on the river needs to be mandated.

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