

## StagBreweryRedevelopment

**From:** Kirsty Gillan-Thomas [REDACTED] AK  
**Sent:** 13 May 2018 10:01  
**To:** StagBreweryRedevelopment  
**Subject:** Comments on the 3 related planning applications: Ref 18/0547/FUL , Ref 18/0548/FUL , Ref 18/0549/FUL 348

Richmond Council Planning Department,

As a local resident and someone who walks past the site on a daily basis I welcome the opportunity to comment on these proposals.

These comments relate to the three separate planning applications proposed at the Mortlake Brewery Site:

- Ref 18/0547/FUL for the development to the East of Ship Lane
- Ref 18/0548/FUL for the development to the West of Ship Lane which includes the School and Playing Fields
- Ref 18/0549/FUL for the alterations to Chalker's Corner and the removal of an area which currently forms part of Chertsey Court.

### Response to the Three Planning Applications

The redevelopment of the Brewery site presents a great opportunity to re-establish a heart and focal point in Mortlake. While there are positives in the design presented by the developer, there are six main areas of concern which, if not addressed, will have a detrimental impact on the existing and new residents:

- The cumulative density of the site is overwhelming
- The plans for the school are inadequate, with too little outside space, and provide for a poor learning environment for the students of the borough
- The local infrastructure cannot accommodate the increase in traffic, with the associated noise and air pollution impacts, as well as concerns for pedestrian and cyclist safety. This will have a detrimental on the quality of life and the health of borough residents.
- There is no strategy for improving the public transportation to help alleviate the situation and importantly, no plan to address the issues of the level-crossing
- Inadequate re-provision of the protected land – green spaces – the playing fields and the Chertsey Court land.
- The low levels of affordable housing provided by the development, and the scheduling that means these will only be built at the end of the works.

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.

Wherever possible the plans should look to enhance the health and wellbeing of local residents, taking full account of the value of outside green spaces, and ensuring that the detrimental impacts on air and noise pollution are minimised. These are already critical issues within the Borough, particularly for the roads around the site, and these will only be exacerbated by the development, and the associated traffic flows.

The development should enhance and support the character of the local community, not be detrimental to it.

### Overall Density of the Site

• The combined density of the scheme remains a major concern: 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 by circa 40%. 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 – units/hectare. (Circa 211 units/hectare east of Ship Lane, cf. average density for Mortlake of circa 70 units/hectare.)
- The compressed layout, where individual residential blocks are very close to one another, especially the higher blocks, 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
- 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 density of the site, number of residents and visitors will have a significant impact on traffic, with the associated impacts on air and noise pollution, which are already issues affecting the quality of life in the borough

### plans for the school

The area of land allocated to the school is not sufficient; it will provide a sub-optimal experience for pupils in that 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.

Further secondary school provision in the borough would be widely welcomed. This provision should be prioritised within the planning process, and greater efforts made to ensure that this public amenity is of high quality, with plenty of provision of outside play space, to support the health and wellbeing of young people in the borough. These considerations should be prioritised over the profit of the developers, and the emphasis on luxury flats.

### Impact on Traffic

In recent years, much new accommodation has been built in Mortlake and Barnes – the traffic congestion has steadily become worse. While the building may have been 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 – it needs to be a combined effort with TFL and the Council. The size of this development will exacerbate a worsening situation with harmful impacts affecting all road "users" including bus passengers, pedestrians and of course people living by them. An estimate additional 500 car journeys are estimated to arise from this new development.

The specific concerns are:

- 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

Particularly with reference to: Ref 18/0549/FUL for the alterations to Chalker's Corner and the removal of an area which currently forms part of Chertsey Court:

- 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, aimed they claim, at improving traffic movements at peak hours. This is far from conclusive and may indeed simply attract further through traffic.
- The destruction of mature trees through this approach is a travesty which will objectively contribute to worsening air pollution along this already highly polluted road and junction. The plans should do everything possible to retain mature trees, and where they are removed replace them with trees of a similar maturity – and consider how more plants and trees can be incorporated in the plans to ensure the maximum protection from the toxic air pollution.

The planning application needs to promote a smaller increase in car usage along with much improved public transportation. Consideration should also be given to strengthening the plans to support pedestrians and cyclists in travelling to and from the site, and connecting with other routes in the borough.

## Public Transport and the Level Crossing

Stated in the 2011 planning brief: "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. There is no prospect of more trains ever stopping at Mortlake and now, even the 209 Route is under threat of a reduced service under the proposals to extend the 485 bus service. Little mention is made of the 190 bus service from Richmond over Chiswick Bridge to Hammersmith and the opportunity of increasing its frequency. **This needs to be re-examined. There is certainly potential for a stronger bus infrastructure to serve the development, and this should consider both the school peak travel times, as well as other peak periods.**
- There is no plan to address the pedestrian and vehicular risks at the Sheen Lane level crossing. Network Rail's own risk assessment of this crossing scores it highly on both individual and collective risk and gives it the highest risk category: it is the 4<sup>th</sup> riskiest CCTV crossing on the Wessex Route. It identifies vehicle-pedestrian as the main risk. The development at the Stag Brewery will increase use (vehicles and pedestrians) of this crossing at peak periods. Increased traffic will lead to further delays, greater frustration and an increased likelihood of accident. **The planning application needs to address this 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 allows development to occur, which are based around the 'quantum, quality and openness' of the land being removed which having to be re-provided on the site. The same issue of re-provision applies to the OOLTI land lost at Chertsey Court.

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.

**This land, once lost, will never be able to be reclaimed, and given the importance of green spaces for the health and wellbeing of the residents of the borough, this aspect should be reconsidered within the proposals. The stag brewery is a large site, and a brown field site ripe for redevelopment, but that should not mean that the development needs to encroach on the green space that is a valued local amenity. If anything, this development should aim to increase the green space available, not decrease it. This must be reconsidered.**

## Affordable housing

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.

The need for affordable housing in Richmond borough, and London more generally, is great. This should be an aspect of the proposal that is prioritised by the council for the benefit of local residents, and the developers should not be allowed to deliver a lower amount than the already weak guidelines.

**This provision should be integrated in the first waves of the development and robust processes put in place to ensure the allocation is not watered down.**

## Other Observations

The proposals to change the junction at **Chalker's Corner**, which offers limited 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

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.

The allocation of the **Maltings ground floor as a community centre** is a welcome proposal. However, the current layout of the ground floor needs to be re-examined. In its current design it is not sufficiently flexible to be used for multiple purposes and would make it difficult to be a venture that can support itself financially.

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 considered.

In addition, given recent issues relating to building regulations and inspections, including Grenfell and the inadequate checks on the quality of the gas pipes for the flats at the corner of Manor Grove and the Lower Richmond Road which has led to a need for a full refit, I am hopeful that you plan to take a proactive approach in this development, taking care to ensure the quality of the work and materials is up to standard as it is being built to minimise the risks to future residents health and safety.

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