

190549.

54.

StagBreweryRedevelopment

From: Mark Worledge [REDACTED]
Sent: 09 May 2018 23:50
To: StagBreweryRedevelopment [REDACTED]
Cc: [REDACTED]
Subject: Objection to Planning Applications 18/0547/FUL, 18/0548/FUL and 18/0549/FUL.

Dear Sir/Madam

I am writing in response to your Neighbour Consultation letter of 9 April 2018, in order to object to all three of the above applications on grounds of:

- Loss of visual amenity
- Adequacy of parking/loading/turning
- Traffic generation
- Noise and disturbance resulting from use
- Layout and density of buildings
- Contravention of local, strategic, regional, and/or national planning policies
- Nature conservation

As required, please find below my postal address:

67 Lower Richmond Road
Mortlake
London
SW14 7HH

I will set out my objections in summary in this message, but I would also like the opportunity to address the Planning Committee in person during the evaluation process.

Objection to Application 18/0547/FUL

I object to this application on grounds of:

- Adequacy of parking/loading/turning
- Traffic generation
- Layout and density of buildings

Mortlake is a sub-urban "village", characterised by moderate-density housing of a small-scale (mainly two stories). Bounded by a railway on one side and the river on the other, and poorly served by public transport in comparison with other parts of London, it already suffers heavy road traffic congestion (including occasional complete gridlock) at peak times and has extremely limited capacity to absorb additional traffic.

The planning application, while having considerable merits in some respects, fails significantly against the above criteria in respect of building density and the consequent volumes of traffic and parking requirements that will be generated:

- The proposed number of new dwellings (combined with nursing/care home places) represents a far higher density than is consistent with the local neighbourhood and with various appropriate norms (as I understand it, more than three times the average units per hectare in Mortlake currently).
- Combined with traffic generated by the school proposed in 18/0548/FUL, the volumes of additional road traffic created exceed what can reasonably and tolerably be absorbed within the fixed capacity of the neighbourhood's geography – notwithstanding the proposals in 18/0549/FUL, which are believed by some to be likely to exacerbate rather than relieve the problem.
- The proposals for new parking provision seem certain to be inadequate in practice, and to lead to intolerable increased burden on parking provision for existing neighbourhood residents. Provision of underground car parking space will not create any disincentive from residents of new dwellings and particularly customers of the new facilities being proposed in the development (cinema, gym, etc.) using instead the currently unrestricted parking available to current local residents. That current parking provision is at the moment adequate but strained – it being frequently necessary to park one's car some distance away from one's home and in another street. Without protection of the parking rights of current local residents, the new residents of and visitors to the proposed new development will cause an unreasonable adverse impact.

Objection to Application 18/0548/FUL

I object to this application on grounds of:

- Loss of visual amenity
- Adequacy of parking/loading/turning
- Traffic generation
- Noise and disturbance resulting from use
- Contravention of local, strategic, regional, and/or national planning policies
- Nature conservation

This application involves the total destruction of playing fields that have OOLTI classification/protection. A whole range of policies (many cited in the application paperwork) set stringent criteria for the circumstances in which such destruction is allowable for consideration by LBRuT, and the application clearly fails to fully satisfy those criteria.

The application papers attempt to argue the case that the total sporting value and usage of the playing fields' area will be increased by the use of most of that area for a secondary school. If that were true, then the criteria might be met. But, as I will explain below:

I do not believe that case can be upheld – certainly not without breaching other objection criteria; and

Even if that case were upheld, that would not justify all of the uses of the playing fields' area included in the application – some proposed uses are clearly completely unacceptable because of being an absolutely clear breach of the criteria enabling the development of OOLTI land.

Part of the application involves an all-weather football pitch and a separate "MUGA"/play space. In order for the volume of use of these facilities to exceed the volume of use possible from the existing facilities (i.e. two full-size football pitches), and in order for the application's assertion of an increase in community usage to be possible (i.e. use by users other than pupils at the proposed school), it seems certain that evening usage will be necessary – involving floodlighting. But that would breach the objection criterion "Noise and disturbance resulting from use" because the playing fields are currently used only during the daytime. If evening usage is avoided so as to comply with the requirement to avoid noise and disturbance, then the volume of usage will not increase over and above the usage levels possible if the playing fields are retained – in which case the validity of the case for replacement of the playing fields fails. Either way, the proposals in the application are unacceptable and cannot be approved by LBRuT without breaching the Council's established policies concerning the preservation of playing fields.

Even if it is concluded that replacement of the current playing fields can be justified by the provision on their current area of increased sports facilities, there are other aspects of OOLTI characteristics that would be lost through the proposed development, and the loss of which makes the proposal again unsupportable by the Planning Committee. The current playing fields are truly "open" land, in the sense of being an uninterrupted area of grassland providing a large visual amenity to Mortlake residents and everyone travelling along the Lower Richmond Road. Notwithstanding the small area of park included in the proposals, the application proposes to replace that open land with a mixture of school buildings and non-grass sports pitches/courts which, in accordance with the way all other local schools are built, will surely be fenced or walled off from view from the outside. All well as massive loss of visual amenity, this must also have a huge detrimental nature conservation impact, as the wildlife that is supported by the current large open expanse of grassland will not be able to survive in the fully built-over alternative that is proposed.

Finally, even if it were to be concluded that construction of a new school's sports facilities on the playing fields' area is justified, compliance with the criteria for building on playing fields and OOLTI would require that only the sports facilities themselves should occupy the area currently occupied by the playing fields. This means:

The teaching and administration parts of the proposed new school buildings should be sited wholly to the eastern side of the current playing fields, rather than occupying part of the playing fields' current area; and

The area of the new park that it is proposed be "reserved" for a possible bus turnaround should be retained as park only – there is no possible justification within LBRuT policies for replacement of playing fields or OOLTI with a bus stand/turnaround (even if it could be

accomplished without loss of any of the protected trees bordering the current playing fields – which seems unlikely).

Specifically on the issue of the bus turnaround, not only is that proposed alternative use of the OOLTI playing fields completely unacceptable by LBRuT policies, it is also wholly illogical. Increased provision of bus services to the area of Stag Brewery is certainly a good idea, and extension of the 209 route further west than its current Avondale Road terminus would be valuable. But to extend the route only to the junction of Lower Richmond Road and Williams Lane and then turn back makes no sense at all. A key part of the Council's justification for the need for a secondary school on the site is the current under-provision of school places for children in Kew, and yet it is proposed to extend to the site bus services only from Hammersmith. A clearly better solution – if the 209 is to be extended – is to extend it into Kew so as to allow access to that population of children. A natural new turnaround point is therefore Kew Retail Park, which has existing bus stand and turnaround facilities. This would also avoid the need for buses on the route to turn right from Lower Richmond Road into Williams Lane – a turn that would require them to cut across the already busy eastbound flow of traffic in Lower Richmond Road and therefore worsen further the westbound congestion.

A further point to make on the subject of the proposed bus stand/turnaround is that its location is directly opposite Lady Elizabeth House – a residential home for the elderly. Given recent medical evidence about the link between air pollution and preventable early deaths and the Mayor of London's concerns about pollution (and the aspiration of the new Leader of LBRuT Council to make Richmond the "greenest" borough in London), it would be an extraordinary decision by any Planning Committee to give the go-ahead to a development that worsens traffic-related air quality pollution immediately opposite a residential home for the elderly. There could be severe legal consequences for the Council and potentially for individual Councillors or officers responsible for a decision that led to consequential deaths.

The argument about whether there is justification for the replacement of the originally-proposed primary school by a secondary school instead is one I cannot address, and must leave to others. But what even a non-expert like me can say with certainty is that the size of the proposed school (in terms of pupil numbers), when combined with the very high proposed number of dwellings and other facilities on the overall Stag Brewery site, creates a traffic generation problem significantly disproportionate to the capacity of the local road network. The nature of the school-related traffic will also – even it does not add to the parking burden – significantly exacerbate turning problems, in Williams Lane and at the school entrance. If a secondary school (or any school) is to be built on the site, it must be a lot smaller (in terms of pupil numbers) in order for the application to be viable.

Objection to Application 18/0549/FUL

I object to this application on grounds of:

· Traffic generation

There are other concerns too about this application, but other local residents will understand those concerns better so I will leave writing about them to them. My specific concern about this application, as a local resident, is simply that I do not believe the proposed changes to the

Chalkers Corner junction will have a sufficient favourable impact on traffic congestion in Mortlake (and specifically along the Lower Richmond Road) to make the scale of the development proposed in applications 0547 and 0548 viable and acceptable. Indeed, there is considerable reason to believe that the long-term impact of the proposed changes will be net UN-favourable, by sucking additional through-traffic through Mortlake as opposed to alternatives to the north (the A316 over Chiswick Bridge) or to the south (the Upper Richmond Road).

My impression is that application 0549 is a somewhat desperate "leap of faith" proposal so as to be seen to be doing at least something to mitigate the implicitly-acknowledged massive traffic generation problems arising from applications 0547 and 0548. The choice of Chalkers Corner as the location of such an attempt – despite the inadequate and quite possibly even counter-productive impact of the proposal – serves only to demonstrate the paucity of alternative options available to solve the traffic generation problems associated with the overall Stag Brewery redevelopment. The very existence of application 0549 represents an implicit acknowledgement that applications 0547 and 0548 are unacceptable in their current form: the overall plan for Stag Brewery redevelopment needs instead to be on a considerably less dense scale – in line instead with the Planning Brief adopted after extensive consultation back in 2011.

Regards

Mark Worledge

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