

The Former Stag Brewery – The 2022 Development Proposals – Submission to the London Borough of Richmond upon Thames.

The Mortlake Brewery Community Group (MBCG) was formed in 2017 to enable the local communities of Mortlake and East Sheen to respond to the development proposals for the Stag Brewery site.

MBCG wishes the readers of this submission to focus on the highlighted (in bold) sections in the text.

This submission has been prepared principally by the MBCG’s Transport Advisor. It is MBCG’s response to the latest (2022) planning applications and supporting transport documents prepared by the developer Reselton’s consultants. The documents previously supporting the 2021 applications are Technical Notes TN039, 040 and 041 and the New Highway Mitigation Plans. These are considered to be only broadly relevant to the 2022 applications. However we note that a new TN (039a) dated 04.01.21 also deals with the Vissim modeling which appears to make changes to the earlier TN 041 Vissim report. These supporting documents are sometimes inconsistent and therefore particularly confusing.

TN039 - Hammersmith Bridge Closure Impacts

This document was submitted to the GLA to support the developer’s applications made in 2021. The bridge re-opening was forecast to be achievable by late 2027 provided that funding had been secured by May 2022. **Our understanding is that no funding agreement has yet been reached.**

This assessment is incomplete and inconclusive and leaves readers unsure both about the impacts of the bridge closure both with and without the proposed development of the Stag site. In para. 1.1.2 it states that since there was no opportunity to do further surveys because of the pandemic. It is admitted that new surveys and traffic modeling work will need to be done prior to the implementation of the “highway improvements”. It is not clear what these “highway improvements” actually refer to as with any other changes that may be made to the bridge’s ultimate traffic function. It is also unclear what the impacts of TfL’s changes to local traffic signal timings are both now and at later stages.

Regarding the actual surveys carried out before and after closure of the bridge (2017, 2018 and 2019) only the data for Chiswick Bridge and Chalker’s Corner are shown. No data is shown for the impact on the **nearest bridge** to Hammersmith which is Putney. As Putney Bridge and Putney High Street are also very congested and as the measured peak hour two-way traffic flow over Hammersmith Bridge pre-closure was c. 1300, the very small increase

apparently measured over Chiswick Bridge (c.129 but shown as 3-8%) implies a likely net reduction in cross river traffic over a wider area. This impact is the **logical reverse** of the “induced traffic” effect of increasing highway capacity for example on the local road approach to Chalker’s Corner. MBCG has previously and consistently provided evidence that this would occur should the A3003 Lower Richmond Road approach to Chalker’s Corner be widened.

TN039 shows in Figs 2.5 and 2.6 that the change in peak two-way traffic flows on the A 205 South Circular Road (Clifford Avenue) are **marginally lower** by c. 100 vehicles post closure. **This is judged to be counter-intuitive given the experiences of local residents.** These data might also suggest that there would be less traffic on Kew Bridge as a result of the closure of Hammersmith Bridge.

The survey data presented shows a small reduction in traffic flow on the Lower Richmond Road. This seems **highly questionable** given the experiences of local residents both in relation to the Lower Richmond Road and the Upper Richmond Road (A 205). It is noted that TfL has been altering signal settings in the area and this is likely to have affected the relative attractiveness of these “competing” routes. There is also a proposal to carry out more surveys and signal setting changes should the anticipated development and bridge programmes need to be changed. **This is hardly a clear and straightforward way to proceed, leaving the local community with no proper indication of the conditions that they will face with or without the proposed development.**

There are some significant and yet unexplained differences in the data presented in Figures 2.4- 2.7 compared with para.1.2.4. The TfL traffic counts measuring the impacts of the bridge closure suggest a far smaller impact than those measured by the surveys undertaken at Chalker’s Corner.

The developers have, for some unexplained reason, demonstrated that the local primary schools in the area are not dependent on Hammersmith Bridge and yet there is no reference to the impact on the proposed large secondary school. Is this meant to say that a new secondary school with a much larger catchment area by the river would not be affected? Our clear understanding is that the Livingstone Academy school proposal would seek to draw its catchment area very widely.

The timescales mentioned for the bridge works are very long (possibly being fully restored only by September 2027) even if a funding solution is found by May 2022. There are no guarantees about this, which means that the later phases of the Stag project and indeed the school element should be subject to planning conditions restricting the developments’ phasing and or occupations to a date when the bridge carrying capacity is fully restored.

Additionally, with regard to the overall phasing, we believe that timing of **the New Highway Mitigation Works should not be allowed to go forward until the bridge is re-opened without a clear demonstration that temporary works traffic impacts can be satisfactorily managed.**

We believe that a full, independent, and strategic review of traffic and transport is overdue in this area of London. The profound uncertainties surrounding Hammersmith Bridge, combined with the large scale developments underway or committed just North of Kew Bridge and the enlarged Stag Brewery proposals on its highly constrained site warrant an urgent strategic review. **This review should be carried out before any major scheme is permitted on the site. The review should take into account further changes anticipated within the new London Plan now agreed with the Secretary of State that clearly have local impacts. An example would be the negative impact of additional trains serving Heathrow from Waterloo on the Sheen Lane level crossing and hence the accessibility of the Stag site.**

TN 040 Consultation Response

This technical note addresses a range of transport-related concerns raised by objectors and commentators when the latest, enlarged development proposals were presented for consultation.

Section 1.4 - Parking Stress Survey Analysis

The parking stress surveys were undertaken on the 3rd and 5th December 2020 for the periods 10am – Noon and 1am- 4am. This is normal practice in normal times in order to judge the day time and maximum night-time demands. However there is no comparable data given to show what, if any, impact the pandemic “lockdown” is having on the normal parking demands. There are many unknowns here as many vehicles will not have been used for several months and some local residents will have been locked down elsewhere or prevented from staying elsewhere. **This work is just clearly unrepresentative.**

Additionally, and most importantly, it is clear that the parking surveys have significantly over-estimated the actual street parking capacity currently available in the area. When proper account is taken of private parking (Hanson Close), areas regularly flooded (Thames Bank and Ship Lane) and other, informal parking areas (Langdon Place), the true supply in the study area reduces by at least 100 spaces. These serious errors in the submitted work have been made clear in evidence provided by residents of the Lower Richmond Road and submitted separately to the GLA.

There are very high parking occupancies evident in Kingsway and Shalstone Road – both close to Lower Richmond Road.

The submitted drawings showing the proposed changes to the Lower Richmond Road to accommodate the bus lane indicate that there would be a loss of some 33 to 36 parking spaces whilst the bus lane is in operation. Yet, in para. 1.4.1, TN 040 implies that the bus lane would operate 24 hours a day for 7 days a week.

We note that the Lower Richmond Road already has a speed limit of 20mph.

Para. 1.5 Chalker's Corner

The options for this junction have now effectively been reduced to two but with the "Light" scheme without the bus lane approach being put forward for implementation. The bus lane option could be introduced by the highway authorities at a later date if found to be justified. The option now put forward for approval still involves an additional left turn lane from the Lower Richmond Road into Chalker's Corner. This measure would require the loss and replacement of trees and the loss at least two parking spaces.

With regard to the expected traffic performance of these options on the Lower Richmond Road journey times, there is little difference between the with and without bus lane schemes. The journey time savings are said to be mainly due to the additional lane into Chalker's Corner. **This strongly suggests that the additional lane would, by itself, permanently attract more traffic onto the local Lower Richmond Road as well as accommodate the additional development traffic.** The proposed lane widening on the Eastern approach to the Mortlake mini-roundabout would also contribute to this. It is left unclear whether this local widening is intended for bus use only.

There is an important principle here, with wider implications for planning policy. When new infrastructure is needed to mitigate the impacts of new development, it should indeed be part or fully funded by the developers. But where a superior, less damaging solution can be found by improving a strategic network component rather than a local road, for example to one of the strategic routes through Chalker's Corner, then funding obligations should be directed to solving this strategic problem thus yielding wider economic and environmental benefits. TfL is in possession of technical solutions here that show what could be achieved. Such solutions should be considered as part of an independent strategic transport assessment and put to the local communities in consultation.

With regard to the detailed management proposals for Chalker's Corner, we see that matters are still unresolved since it will be necessary to do further surveys, assessments and thence likely adjustments to traffic signal timings.

Paras. 1.11-12 – Mortlake Station and Sheen Lane Level Crossing

Para. 1.6.11 Figs. 3 and 4. We particularly note the significant connectivity of the pedestrian and cycling routes to the Sheen Lane level crossing area. This strong connectivity applies to both the development applications.

With regard to the Sheen lane level crossing, the proposed improvements are **totally inadequate**. They simply involve new signs to encourage use of the

footbridge, stop lines for cyclists and the re-positioning of some bollards adjacent to North Worple Way and South Worple Way. The new, more extensive development proposals are forecast to generate **(questionably)** much less vehicular traffic than the original applications **but much more pedestrian traffic**. This outcome would add extreme pressure at the level crossing area. This is a clear safety issue and not necessarily one about the physical capacity of the stairs and footbridge by the station. Our own video surveys provided to Network Rail show the natural and dominant preference for pedestrians and cyclists to cross the railway at ground level even to access a platform. **It is worth noting that Network Rail opposed the development of the primary school adjacent to the level crossing on safety grounds.**

The developer now forecasts a development trip increase of some **916** pedestrian trips in the AM peak hour together with a further **349** walking trips to reach a train service and 61 extra cycling trips. If **just 50%** of the 916 figure were to cross the railway at Sheen Lane, then there would be an increase of **807** pedestrians trying to cross the railway or use the stairs in the AM peak hour. **This suggests a serious increase of at least the pedestrian demand to cross the rail tracks at ground level. We call on the developer, Network Rail and LBRuT to agree a funding mechanism to create a far safer and user-friendly solution to the hopelessly inadequate conditions around the station area.** Network Rail is aware of the problems and risks at this crossing from the time of the first application and has previously written to the then local MP stating that a radical solution is needed. Since then, the development proposals have increased in scale but with an assumed higher proportion of public transport and walking and cycling trips. In addition to this, the numbers of additional pedestrians seeking to cross the Lower Richmond Road would be 349 plus say 75% of the 916 totaling some 1036 in the am peak hour.



Sheen Lane Level Crossing at 8.10 am



Sheen Lane Level Crossing at 3.38 pm



Sheen Lane Level Crossing at 5.11 pm

We note that the minor measures proposed at Mortlake station and the level crossing are intended to benefit rail users. We note also that the applicants see that there is potential for school staff to monitor pupil safety at key locations (School Travel Plan para. 6.5)

TN 041 – Stag Brewery Vissim The Modelling Summary (Also TN 039a)

We note that the total vehicle movements forecast by the developer in the critical AM peak hour has increased marginally from 326 to 328 despite a 13% reduction in the housing totals. Our earlier comments on TN 041 therefore remain essentially the same.

Future traffic growth and local developments.

We are reminded that the traffic tests, as agreed with TfL, focus on the future date of 2031 with the modeling work making forecasts of future traffic patterns that include assumptions on London’s development growth (mainly population and employment projections). Leaving aside any newly emerging attempts to agree forecasting scenarios following the experiences of the current pandemic, we remain concerned that the full impacts of major developments underway and committed just to the North of Kew Bridge in Brentford and along the A 4 growth corridor are not accurately reflected in the strategic traffic modeling. Putting the scale of these developments into context, we have calculated the growth committed in the 15 year period from 2015 to 2029. **This growth amounts to an additional 10,000 homes and 34,000 jobs.** Accurate zonal modeling should show these specific impacts on Kew Bridge (the North and South Circular Road) and the key radial routes of the A 4 and A 316.

The data presented in the newly published report concentrates on journey times and comparisons on the roads around the Stag site for the various scenarios examined. In summary we see from Table 1 in TN 040 and in Table 1 below the summed journey times of general traffic. The comments noted by MBCG need to be answered as these data appear to be highly sensitive to the model’s input parameters.

Table 1: Local Road Network Journey Times (JTs)

<i>Scenario</i>	<i>JTs (Seconds)</i>	<i>MBCG Comment</i>
Base (now) AM	5688	
Base PM	5891	
Future (2031) AM	7012	23% longer than Base
Future PM	6341	8% longer than Base
Future + Stag AM	8658	52% longer than Base
Future + Stag PM	6631	13% longer than Base
Future + Stag + CC2 AM	7072	24% longer than Base but just 1% longer than Future
Future + Stag + CC2 PM	6396	9% longer than Base

Focusing on the Lower Richmond Road – the developer’s forecast journey times from Chalker’s Corner (CC) to and from the Mortlake Mini Roundabout are shown in Table 2.

Table 2: Journey Times (Minutes) Forecast on the Local Road Network - Lower Richmond Road

Peak Hour	Base	Future Base	Future Base + Stag	Future Base + Stag + CC2-No Bus Lane	Future base + Stag + CC4 - With Bus Lane
East Bound					
AM	9.95	11.4	18.5	13.0	11.6
		+15%	+86%	+29%	+16%
PM	10.6	15.2	17.1	14.4	14.2
		+43%	+61%	+36%	+33%
Totals	20.6	26.7	35.6	27.3	25.8
West Bound					
AM	5.7	7.6	11.3	7.2	7.1
		+33%	+98%	+26%	+25%
PM	8.5	12.1	12.2	10.8	11.2
		+42%	+44%	+27%	+32%

We note that the journey times for all the tests shown in TN 039a (Table 9) for the East-bound link from Chalker’s Corner to the Mortlake mini roundabout are significantly faster than those shown above.

There are **serious warnings** (note the 86 - 98% increase forecast), anomalies and hence legitimate queries in Table 2. But overall, **if accepted**, the forecasts, **though robustly disputed by MBCG**, suggest that the actual traffic flows leading to these delays, if “mitigated” by either of the two preferred Chalker’s Corner options, may be within the “acceptable” significance threshold of a standard Environmental Assessment. **This conclusion is distinctly challengeable - the more so because, with evidence, MBCG believes the developer’s forecast traffic flows are far too low. We also question whether full account has been made of the traffic impacts of the additional pedestrian crossing points and increased pedestrian flows**

The New Highway Mitigation Plans

There is no information provided about any replacement of the disabled parking bay on the Lower Richmond Road.

The proposals show the removal of the West-bound bus stop adjacent to Mortlake Green whereas the nearest West-bound stop on Mortlake High Street has been moved just 15 metres to the West.

A 25 metre bus stop bay is shown on the South side of the Lower Richmond Road opposite the proposed school. This would accommodate only 2 buses at a time. A large secondary school with a policy to attract pupils over a wide catchment area would need far more bus facilities, only some of which could be provided in the area potentially reserved as a bus terminus.

Some Key Numbers to Demonstrate the Stark Differences in the Traffic Impacts Forecast by the Developer and MBCG.

This section of our submission demonstrates why it is necessary to conduct an independent and more strategic transport review before any approvals can be safely made for such large scale development on such an access- constrained site.

In Table 3 we examine the key forecasts prepared by the developer’s consultants and MBCG for four development scenarios.

It is relevant to consider these four scenarios because they represent a clearer and contrasting picture of the true impacts of developing each set of proposals put forward since this seriously access-constrained site became available.

The four scenarios are;

- A The original development brief following the Council’s consultation
- B The first applications by the developer
- C The 2021 applications by the developer
- D The 2022 applications by the developer
- E A community proposal by MBCG

For each scenario we principally examine the road traffic generated in the critical peak period – 8-9 am when the standard peak coincides with the morning school run. We focus again on the Lower Richmond Road/Mortlake High Street link which is the **sole vehicular access road** for the new development.

Table 3: Total Vehicles (2-Way) in the AM Peak Hour

Scenario	A (original consultation brief)	B (First Application)	C The (2021 Application)	D The (2022 Application)	E (A community Proposal)
	560 units plus Primary School	893 units plus Secondary School and Misc. Uses	1250 units plus Secondary School and Misc. Uses	1085 units plus Secondary School and Misc. Uses	900-1000 units plus Primary School and Misc. Uses
Developer forecast	c.232	427	326	328	c.250
MBCG Forecast	256	533	578	538	c.331

From Table 3 we note that the developer forecasts **just 328** vehicles generated by the Scenario D, all of which would use the Lower Richmond Road or Mortlake High Street for access. His forecast increase in journey times along this route even with mitigation are around 33% above the current base depending on the presence and effectiveness of the Chalker’s Corner proposals. **But if we applied the MBCG’s figures for the latest, enlarged development’s generated traffic (the 538 vehicles), the delays would be far, far worse. And this is a valid, and not just a perceptive forecast that clearly demonstrates that the development proposals are just too much for this constrained site. Any evidence of new housing developments built in areas with very low public transport provision such as the Stag site (PTAL 1-2) actually displaying very low levels of car use as anticipated by the developer appears to be lacking. This evidence has been sought from TfL.**

Conclusions

We wish to emphasize the following;

- The submitted supporting documents relating to transport impacts from the developer indicate wholly inadequate transport mitigations given the scale of the scheme combined with the secondary school.
- **Unless clear evidence can be provided**, it would appear that flawed and misleading assumptions have been made about the effects of reducing car parking on the total traffic generation of a constrained development site in Outer London with a very low public transport accessibility level.
- Permanent, congested traffic and worsening environmental conditions on the Lower Richmond Road, Mortlake High Street and Sheen Lane would result.

- The impacts of the Hammersmith Bridge closure are not made clear as the information is too limited and uncertain. The real experience of local residents over the whole day is not reflected in the data provided.
- Unsubstantiated assumptions about any restoration scheme and programme for the bridge are made.
- Complete disregard for the development impact on traffic and pedestrian safety conditions at the Sheen Lane level crossing is made despite Network Rail stating earlier that a radical solution would be needed there and indeed opposing the siting of the primary school adjacent to the crossing..
- The developer claims that the site is more accessible by public transport than the official measure (PTAL) reveals. This assertion is challengeable particularly given the uncertainties about the future service levels.
- The analysis to justify the possible removal of on street parking to accommodate a bus lane showed a complete lack of local knowledge and actual parking supply. The timing of this analysis was completely unrepresentative of normal conditions.
- The latest proposals are blatantly too large and dense for this constrained site. They should be refused and a smaller scheme eventually put forward giving time for thorough independent strategic transport assessment of the area to be carried out.
- We see that there are a number of issues arising with this development case that potentially have national implications via planning precedent and hence be relevant in the event of a “call in”;

National/Regional Implications and Planning Precedent

- The principal of funding adequate and appropriate mitigation – local versus regional/strategic intervention, direct funding or via escrow.
- The danger of over-dependency on aspirational policy objectives rather than proven ones.
- The total lack of transparency made available concerning traffic modeling at the regional level including impacts on National/ Regionally Strategic roads.
- The New London Plan now including a rail service to Heathrow (the Southern Access via Waterloo) thereby further restricting the application site access via Sheen Lane
- The Network Rail national policy for level crossings deemed at high risk.

