67 Lower Richmond Road
Mortlake
London
SW14 7HH

John Finlayson
Head of Development Management
Greater London Authority
[redacted]

1 March 2021

Dear Mr Finlayson

Planning applications, references 18/0547/FUL, 18/0548/FUL and 18/0549/FUL:
Representations on additional information

Thank you for your email message of 8 February, inviting me to make representations to the GLA concerning the additional information provided by Reselton Properties Limited in connection with the planning applications, references 18/0547/FUL, 18/0548/FUL and 18/0549/FUL, submitted by them to the London Borough of Richmond upon Thames (LBRuT) on 29 March 2018.

I am writing to re-iterate my objection to all three of the planning applications – based on the existence of widespread and profound factual inaccuracies in Technical Note TN040. I detail and evidence these inaccuracies in the annex to this letter. These are not matters of opinion – they are straightforward matters of fact. The proposal to mitigate traffic congestion associated with the proposed Stag Brewery development by means including the siting of a westbound bus lane in Lower Richmond Road is fundamentally invalidated by the proven existence of these inaccuracies.

Technical Note TN040 recommends adoption of an "Option 4" for mitigation of traffic congestion that will be caused by the additional residents and other users of the Stag Brewery site if Proposals A and/or B are approved. An essential condition for this recommendation is Technical Note TN040's finding that "the on-street spaces removed to implement a bus lane can be accommodated on the surrounding road network" – a conclusion based on a parking stress survey included in the Note. However, that parking stress survey is very significantly inaccurate in its measurement of available parking spaces in the locality of the brewery.

Table 1 in Technical Note TN040 presents "Total Spaces Available" in the surrounding road network as 492. This figure is contrasted with a "Worst Case Parking Number" of 366, and the conclusion drawn that adequate spare capacity exists to enable the removal of 36 parking spaces (in order to accommodate the proposed bus lane) without causing parking stress to rise to unreasonable levels. These figures suggest that a minimum of 90 spare spaces would remain (492-36-366 = 90).

But the quoted figure of 492 is massively wrong – to an extent that suggests negligence, incompetence or even deliberate deception:

Firstly, there is a basic arithmetic error in Table 1 (repeated when the incorrect figure is mis-quoted in para 1.4.6 of the Note): the individual "Spaces Available" in Table 1 sum to only 452, not 492; and

Many of the individual "Spaces Available" numbers in Table 1 are in any case incorrect – hugely overstating the actual number of spaces available in several of the roads considered.

The table below contrasts the figures presented in TN040 (with the 492 v 452 error corrected) with the actual numbers of available spaces in the surrounding road network – shown "Now" (meaning before the proposed Stag Brewery development) and "After" (meaning after the development as proposed in the current applications), and also showing how the number of available spaces varies at times of tidal flooding:

Table A: True Parking Stress around Stag Brewery

	Recorded Maximum Use per TN040	Claimed Available per TN040	Actual Available Now Low Tides	Actual Available Now High Tides	Actual Available After Low Tides	Actual Available After High Tides
Cromwell Place	8	8	8	8	8	8
Hanson Close	6	20	5	5	5	5
Kingsway	110	118	118	118	118	118
Langdon Place	23	34	8	8	8	8
Lower Richmond Road	30	36	36	36	0	0
Rosemary Lane	15	16	16	16	16	16
Rosemary Terrace	5	6	6	6	6	6
Shalstone Road	66	67	67	67	67	67
Ship Lane	23	26	26	14	24	12
Thames Bank	11	23	15	0	15	0
Waldeck Road	7	8	8	8	8	8
Williams Lane	62	90	65	65	63	63
	366	452	378	351	338	311
Stress (%)		81	97	104	108	118
Spare/Vacant		86	12	0	0	0

As Table A demonstrates, parking stress in the area is not the 81% claimed by TN040: it is actually 97%, rising to 104% at times of tidal flooding. Parking stress would exceed 100% at all times (i.e. during both low and high tides) if the proposed removal of Lower Richmond Road spaces to accommodate a bus lane went ahead.

The corrected figures for available spaces in Hanson Close, Langdon Place, Ship Lane, Thames Bank and Williams Lane were obtained by means of physical survey carried out in February 2021. The detailed results of this survey are included in the Annex to this letter, with supporting photographs presented in an appendix.

While surveying Langdon Place, ambiguity was apparent about the legality of parking on a raised (and non dropped-kerb) area in the middle of the Place. Because of this ambiguity, the parking that is physically possible but possibly illegal has been omitted from the figures in Table A. However, Table B below (in which that potential additional parking has been included) demonstrates that the overall conclusion remains unchanged even if parking in that area were to be confirmed as legal – i.e. parking stress would still rise above 100% if the "Option 4" proposal in Technical Note TN040 is approved:

Table B: True Parking Stress around Stag Brewery (if additional parking in Langdon Place is legal)

	Recorded Maximum Use per TN040	Claimed Available per TN040	Actual Available Now Low Tides	Actual Available Now High Tides	Actual Available After Low Tides	Actual Available After High Tides
Cromwell Place	8	8	8	8	8	8
Hanson Close	6	20	5	5	5	5
Kingsway	110	118	118	118	118	118
Langdon Place	23	34	23	23	23	23
Lower Richmond Road	30	36	36	36	0	0
Rosemary Lane	15	16	16	16	16	16
Rosemary Terrace	5	6	6	6	6	6
Shalstone Road	66	67	67	67	67	67
Ship Lane	23	26	26	14	24	12
Thames Bank	11	23	15	0	15	0
Waldeck Road	7	8	8	8	8	8
Williams Lane	62	90	65	65	63	63
	366	452	393	366	353	326
Stress (%)		81	93	100	104	112
Spare/Vacant		86	27	0	0	0

There are other reasons I could object to the "Option 4" proposal. For example, I disagree strongly that the benefits claimed outweigh the disbenefit the Note acknowledges exists for Lower Richmond Road residents: especially for elderly residents, the disbenefit would be huge – including the inability to have home deliveries or tradespeople stop or park outside their homes. I seriously doubt the time saving claimed by the Note for bus transport is realisable in practice, because of the additional traffic that would be generated by people looping around the Kingsway/Shalstone Road one-way system and back out onto Lower Richmond Road trying to find the very few parking spaces actually available. I also have methodological concerns about the parking stress survey – e.g. the 200m walking distance standard (deriving from the London Borough of Lambeth methodology widely accepted as the unofficial standard) should, in this specific case, be measured from the area affected by the bus lane proposal rather than from the brewery site.

However, these other grounds for objection involve at least some element of opinion/subjectivity or a wholly subjective weighing-up of relative benefits/disbenefits – which is precisely what councillors and GLA members are elected to exercise. This is why I have limited my objection to matters of pure,

objective and unarguable FACT. The "Option 4" proposal rests on demonstrably hugely inaccurate information. Once the existence and scale of that inaccuracy has been brought – on the record – to GLA's attention, GLA members and staff would be objectively culpable if they proceeded to approve any application or proposal based on that misinformation.

Furthermore, the inclusion of such flawed information as TN040 in Reselton Properties Limited's overall submissions must call into question far more deeply the reliability (perhaps even the integrity and honesty) of other elements of the planning applications.

The applicant clearly has a vested interest in seeking to maximise the scale of development on the Stag Brewery site. On the other hand, I, many other local residents (as evidenced through groups such as the Mortlake Brewery Community Group) and LBRuT itself (as expressed in its original 2011 Planning Brief for the site) believe that the scale of the proposed development (the number of residential units, the physical scale of the proposed buildings, the inclusion of a secondary school instead of – as originally proposed – a primary school, etc.) is excessive and fundamentally unsuitable – given the site's location and the inherent geographical constraints on the surrounding transport infrastructure.

In ruling on the planning applications, GLA must consider the question, "On whom lies the burden of proof?" It is easy perhaps to imagine that we local residents are unreasonable and ill-informed "NIMBYs" and the applicant (with their professional surveyors and consultants) objective and accurate. But the shoddiness of TN040 must call this into question – it shows that those of us saying, "You should listen to us – the planning applications are of excessive size that will be profoundly deleterious to both existing local residents and the new residents for whose supposed benefit the plans exist" are right. You must now ask yourselves, "If the applicant can be so wrong with this parking stress survey, what else may they be wrong about?"

So, although this letter is principally an objection to the Option 4 bus lane proposal, it should be taken also more generally as an objection to the entirety of the A and B applications at their current size. We in Mortlake are not NIMBYs: we actively want the brewery site redeveloped. Redevelopment of the site provides a once-in-a-generation opportunity to improve and re-invigorate our neighbourhood. The 2011 Planning Brief (the result of extensive local consultation and professional input by LBRuT's planners) set out a widely-agreed development proposal that would achieve that goal. It should be returned to in arriving at the eventually-agreed solution …

… and, whatever that eventually-agreed solution is, it should not – cannot in fact – include a bus lane that would result in the removal of the parking spaces along Lower Richmond Road. As this letter factually and unambiguously demonstrates, and completely contrary to the appallingly inaccurate TN040, there is literally no space for that parking to be relocated.

Yours sincerely

Mark Worledge

Annex: Selected Errors in Technical Note TN040

This annex focuses on factual errors in five rows of the "Total Spaces Available" column of Table 1 in TN040 – those rows relating to Hanson Close, Langdon Place, Ship Lane, Thames Bank and Williams Lane.

In its preparation, other information contained in TN040 (including elsewhere in Table 1) has not been reviewed and checked. No conclusion can therefore be drawn about whether further errors exist elsewhere in the Note, hence this annex being titled "Selected …"

This annex contains text only: the referenced photographs are presented in an appendix.

Hanson Close

Available spaces per Technical Note TN040 = 20
Actual available spaces = 5

Photo H01 shows an aerial photograph of the entirety of Hanson Close, showing parking status as follows:

Green: Parking freely available
Yellow: Parking unavailable because of yellow lines
Red: Parking unavailable for other reasons

The two Green areas are divided by a small Red section, marking the site of a dropped kerb ramped access to a side door of the building until recently used as a community centre. This is shown in Photos H02, H03 and H04 – partly obscured by a grey car. Although the building appears currently unused (such that cars feel able to block the ramp with impunity), it should be assumed that it will re-commence operations in due course, at which point this access point will again be required and parking in front of it impossible.

The two Green sections therefore need to be considered individually. The northerly section is 6m in length and the southerly is 24m. This translates to a parking capacity of 1 car + 4 cars = 5 cars in total. [Note: This figure is one fewer than the maximum number of cars the survey found parked in the road – this is explained by a car illegally parked obstructing the ramp.]

No other parts of Hanson Close are available for public parking:

As Photos H05 and H06 show, the courtyard to the west of the Close (wrongly shown on Google Maps as a continuation of the road) is an off-street car park for the use of staff and visitors to the nursery and the community centre buildings immediately to its north.

As Photos H07 and H08 shows, the parking area to the east of the Close is private and reserved for residents/staff/visitors of Lady Elizabeth House (67A Lower Richmond Road).

As Photos H09 and H10 show, the apparent continuation of the Close south of this point is in fact a private road solely for the use of residents – the print is too small to make the warning notice legible in the Google Maps image, but is shown clearly in the enlarged photo H10.

Langdon Place

Available spaces per Technical Note TN040 = 34
Actual available spaces = 8 (potentially raised to 23 if parking on "Section B" is legalised – see below)

Although small, Langdon Place is complicated in terms of parking availability: several different sections of the road have to be considered individually. As highlighted on Photo L01, these are as follows:

Section A: A U-shaped road section
Section B: A raised (non dropped-kerb) tarmac area that forms a central "pavement" within the U-shaped road section
Section C: A road-level parking bay cut into Section B
Section D: A straight west-east section of road to the west of Section A
Section E: The continuation of Section D across the top of the "U" formed by Section A
Section F: The continuation of Section E to the east of Section A leading to the junction with Rosemary Lane

Section A:
As shown in Photos L02 and L03, the width of the roadway around the "U" is only 3.8m, so no parking is possible without blocking it.
Available parking spaces in Section A = 0.

Section B:
The status of this section is unclear. Prima facie, it does not appear intended for vehicular use: although it is surfaced with tarmac, it is raised above road level – it is at standard pavement level – and has no dropped-kerb access leading to it. It is certainly frequently used for parking, and there are no signs or markings indicating that parking is not allowed. However, no such signs or markings would be present on any other section of pavement, so the absence of explicit prohibition cannot be taken as evidence of the legality of parking. Perhaps most tellingly, the very existence of this raised area can be taken as indicating that parking is NOT permitted: the road-level Section C (see below) is clearly intended for parking, so if Section B were also intended for parking then the entire area comprising Sections B and C could have been left at road level. Why construct a raised non dropped-kerb area into which a parking bay is cut at all, if the constructed raised area is intended to be used in exactly the same way as the road-level parking bay? For this reason, it should be assumed (unless officially confirmed otherwise) that parking is not permitted on Section B. If, however, parking is in fact permitted, the total number of cars that can be accommodated is uncertain. There are no marked spaces and cars park at a mixture of directions and angles so to best fit in: the standard measure of 5m of kerbside per space cannot be applied. As Photo L03 shows, the small area at the northern end of Section B can accommodate only a sub-5m car (the grey Mini). Excluding that area, the remaining contiguous area of Section B seems likely to accommodate a maximum of 15 cars. This estimate is consistent with Photo L01, and also the fact that the total number of cars the surveyors found in Langdon Place was 23 (i.e. 15 in addition to the 8 spaces in Section C – see below).
Available parking spaces in Section B = 0 (or possibly 15).

Section C:
Although individual bays are not marked out within this parking area cut into Section B, it is apparent (see Photos L01, L02 and L03) that a total of 8 cars can fit into it, if parked parallel with the side edges of the cut-out section – i.e. facing into Section B.
Available parking spaces in Section C = 8.

Section D:
This section of Langdon Place has a width of only 3.5m, and is therefore not viable for parking. This is shown in Photo L04: a black SUV has parked in this section of the road and illegally blocks it, because it cannot be passed by another vehicle without having to illegally mount the pavement.
Available parking spaces in Section D = 0.

Section E:
For this short section between Sections D and F, parking would be possible on the road's northern side … except that that northern side is interrupted by gates/garages. There is one single section with a distance of 5.1m between two adjacent gates, but the easterly of those two gates is sliding rather than hinged, so when opened it extends into that 5.1m space leaving only 2.7m permanently available. This is shown in Photo L05, in which the position of the parked black car means it risks fouling and/or being damaged by the operation of the sliding gate.
Available parking spaces in Section E = 0.

Section F:
Section F is marked with double-yellow lines on both sides along its entire length – see Photo L06.
Available parking spaces in Section F = 0.

Ship Lane

Available spaces per Technical Note TN040 = 26
Actual available spaces = 24 at low tides but 12 at high tides

Parking is available on the western side of Ship Lane only, and that kerbside is currently broken by two entrance gateways into the Stag Brewery site (see Photos S01 and S02). However, the plans for the development of the brewery site (see Photo S03) include the insertion of an additional road junction between the two existing gateways – resulting in the loss of some of the existing kerbside (see Photo S04). If the new road is assumed to be 5m in width plus pavement on each side, this will result in the loss of 2 existing parking spaces. If current parking availability (as measured by Stantec in preparing TN040) is 26, then the relevant figure for future parking availability should therefore be taken instead as only 24.

However, not all of Ship Lane is available for parking all the time: the northern section of it is subject to tidal flooding. As Photo S05 shows, the UK Government's Flood Warning Information Service assesses the northern section of Ship Lane (along with the whole of Thames Bank) at "High" risk of flooding. Using the scale in that photograph, it can be seen that the northernmost 60m of the road falls into the "High" risk category – equating to parking for 12 cars. Deducting this figure from the previous total of 24 cars leaves a future permanent availability of only 12 cars.

Thames Bank

Available spaces per Technical Note TN040 = 23
Actual available spaces = 15 at low tides but 0 at high tides

Thames Bank is a fundamentally unsuitable substitute for the parking places it is proposed be removed from Lower Richmond Road:

> Firstly, this is because of the distance from Lower Richmond Road to Thames Bank – from a minimum of 0.2 miles (320m) up to 0.5 miles (805m) (see Photos T01 and T02).
>
> Secondly, and even more fundamentally, the whole of Thames Bank is liable to flooding. As Photo S05 shows, the UK Government's Flood Warning Information Service assesses Thames Bank (along with the northern section of Ship Lane) at "High" risk of flooding. The flooding of Thames Bank is not simply a "risk": it happens frequently. On the day on which the measurements in this paper were taken (19 February 2021), the tidemark from a recent tide high enough to cause flooding was visible as far inland as Parliament Mews (i.e. having washed fully across Thames Bank) – see Photo T03.

During lower tides, and only then, parking is possible along most but not all of Thames Bank. The stretch of road to the west of Parliament Mews is too narrow to enable parking: 4.2m at the turn into Williams Lane broadening to still only 4.8m at the junction with Parliament Mews. Photo T04 clearly demonstrates that the van will be able to pass the pulled-over car only because the car has pulled illegally onto the pavement.

East of Parliament Mews, the south side of Thames Bank (the only side with a pavement/kerb) has a total of five viable parking areas – broken up by dropped-kerb access points to garages/off-street private parking and by the small unmarked road immediately to the west of Thames Cottage (see Photos T05-T08). From west to east, these areas measure as follows:

> 24.4m (i.e. space for 4 cars)
> 15.1m (3 cars)
> 14.0m (2 cars)
> 17.8m (3 cars)
> 17.2m (3 cars)

Williams Lane

Available spaces per Technical Note TN040 = 90
Actual available spaces = 63

As marked on Photo W01, Williams Lane has several sections, each of which needs to be considered separately:

a) A North-South section running north from the Lower Richmond Road junction
b) An East-West section running along the northern perimeter of the playing fields
c) A more northerly North-South section with buildings on both sides of the road

d) A SW-NE section with buildings on the eastern side only, running up to the turn onto Thames Bank

Section A:
A yellow line runs along the full length of the east side, so parking is possible only on the western side. This western side of the road provides the rear access to the properties that front onto Watney Road. Many of these properties have gates providing access from Williams Lane into their back yards/gardens – some used for hard standing, some for garages, some for sheds, but some fenced off such that access cannot be provided. It is only those fenced-off sections, and some short sections of low wall between them, that are available for parking.

Photos W02 to W17 show a full sequence of Google Streetview images covering this entire length of road. These demonstrate that it contains only the following six sections exceeding 5m available for parking (travelling from south to north):

11.7m (i.e. space for 2 cars)
7.4m (1 car)
7.6m (1 car)
5.0m (1 car)
8.4m (1 car)
7.8m (1 car)

Total available parking in Section A is therefore 7 cars.

Section B:
Parking is possible on the north side (i.e. the side that has a pavement), and the total kerb length on this side is 42.2m. However, this section of Williams Lane is narrow: the western end of it exceeds 4.9m in width (i.e. just wide enough for a 2.5m-wide Ford Transit van to pass a parked 2.2m-wide Land Rover), but it narrows to just 4.1m at the eastern end. Only the western-most 13.1m has a width of 4.9m or more – equating to space for 2 cars.

Photos W18 to W20 demonstrate this. In Photo W20, a Transit van will just have room to pass the blue car, but only because it is a small car and has pulled up tight against the kerb. The inability of larger vehicles to park legally in this stretch of road while allowing other vehicles to pass is shown by the fact that the grey SUV has instead opted to park (illegally) on the pavement.

Total available parking in Section B is therefore 2 cars.

Section C:
Measurement of available spaces in this section is much more straightforward. Parking is permitted on both sides of the road, which is wide enough to enable this for the whole of this section.

The western side of the section is broken into three viable parking areas, by Wadham Mews and by a dropped kerb vehicular entrance further north (as shown in Photo W21). The length of these three areas (from south to north) are as follows:

29.7m (i.e. space for 5 cars)

28.4m (5 cars)
40.6m (8 cars)

The off-street area immediately to the north of the last of these stretches is reserved as residents' parking for the residential block fronting that part of the road.

The eastern side of the section is currently unbroken along its whole length. However, the development plans for the Stag Brewery site (Photo W22) show that a road junction with Williams Lane is to be created at the northern end of the site's frontage. This will result in the loss of some of the kerbside currently available for parking (see Photos W23 and W24). Assuming the width of that junction to be 5m of roadway plus pavement on each side, this will result in the eastern side of Section C being divided into two viable parking areas – from south to north:

59.4m (i.e. space for 11 cars)
48.4m (9 cars)

Total available parking in Section C will therefore be 38 cars once the Stag Brewery development is completed. Until the new road junction is built, current capacity can be reckoned higher than this by 2 cars, i.e. 40 cars.

Section D:
The eastern side of this section is straightforward – a single unbroken (albeit curving) stretch of kerb from the northern limit of Section C up to Varsity Row. This stretch is shown in Photo W25, and has a length of 54.8m (i.e. space for 10 cars).

Parking on the western side is compromised by the narrowness of this part of Williams Lane (as noted below, it has already narrowed to 4.1m by the time Varsity Row is reached) and two large trees directly on the roadside (there being no kerb/pavement). There are three potential parking areas:

South of the southernmost tree (shown in Photo W26): 28.1m (i.e. space for 5 cars)
Between the two trees (shown in Photo W27): 5.5m (1 car)
North of the northernmost tree (shown in Photo W28): N/A

The space to the north of the northernmost tree can be used (as shown by the blue SUV in Photo W28) … but only if there is no car parked opposite it on the eastern kerb. Either the full length of the eastern side can be counted as available (as has been done in including the full 54.8m in the calculation above) or the space to the north of the northernmost tree on the western side can be counted, but not both. This is shown in Photo W29: the black van will be able to pass the parked blue SUV only because no car is parked opposite it.

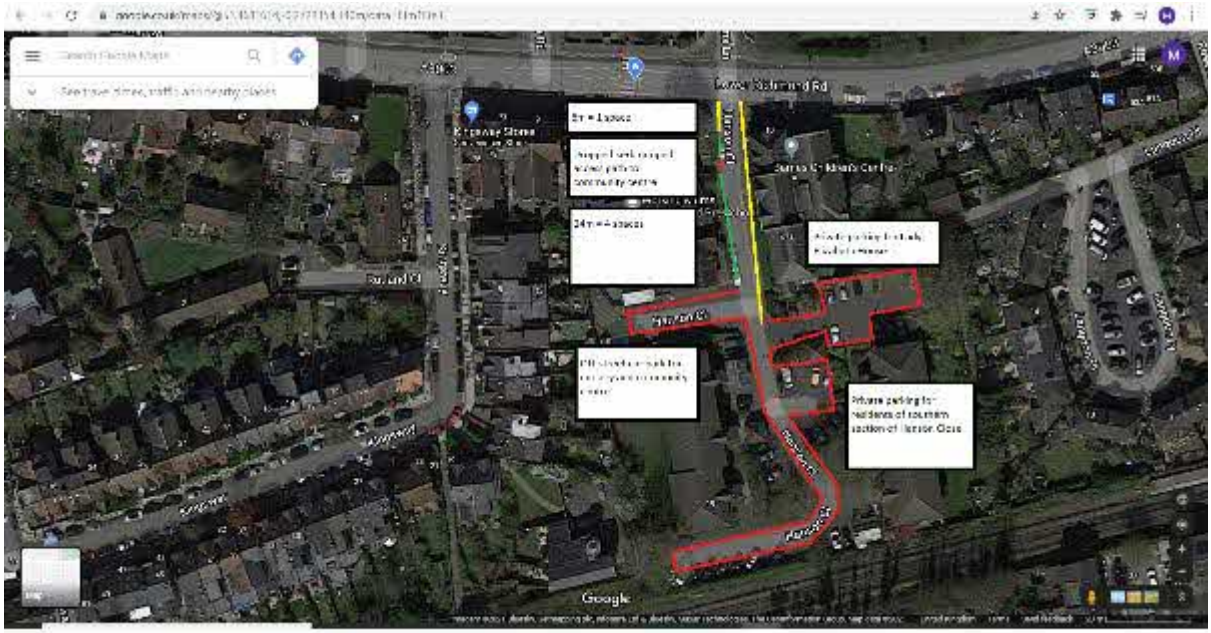
North of Varsity Row, Williams Lane narrows from 4.1m to 3.8m at the turn into Thames Bank – shown in Photos W30 and W31. No parking is therefore possible in this part of the Lane.

Total available parking in Section D is therefore 16 cars.

Appendix: Photographs Referenced in the Annex

In this appendix, the photographs have been pasted into the body of the .doc file in compressed format for ease of reference. All the photographs can be made available as separate full-sized JPG/PNG files on request.

H01:



H02:

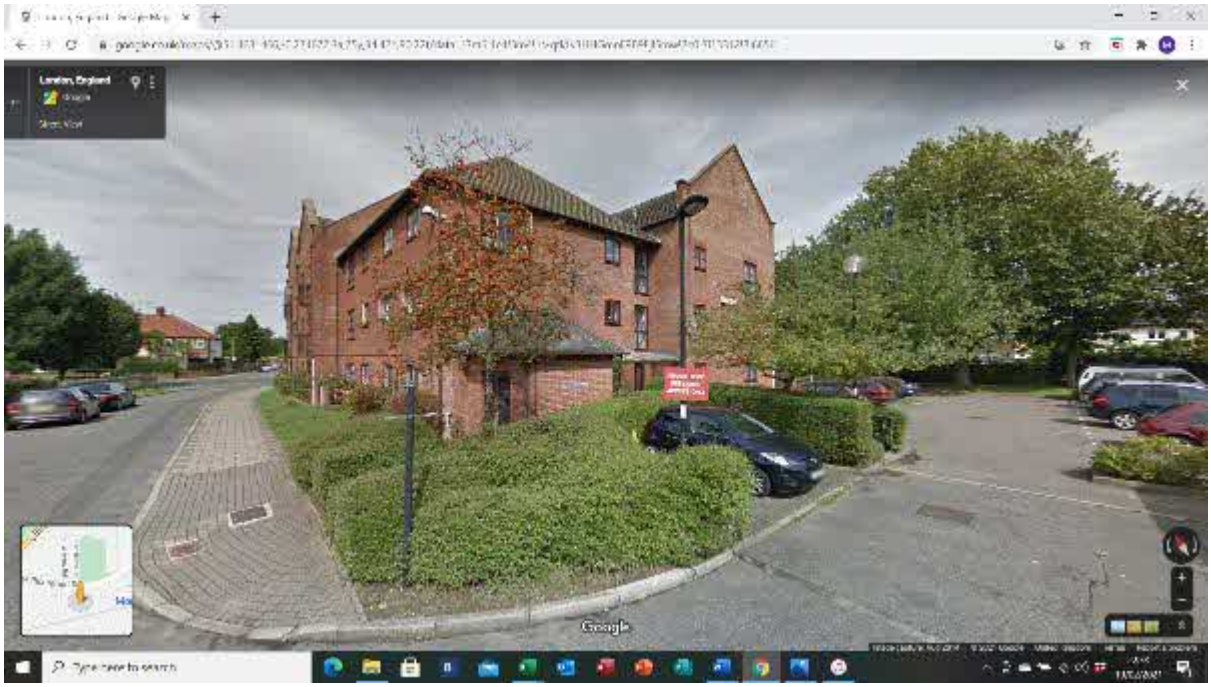
H03:

H04:

H05:

H06:

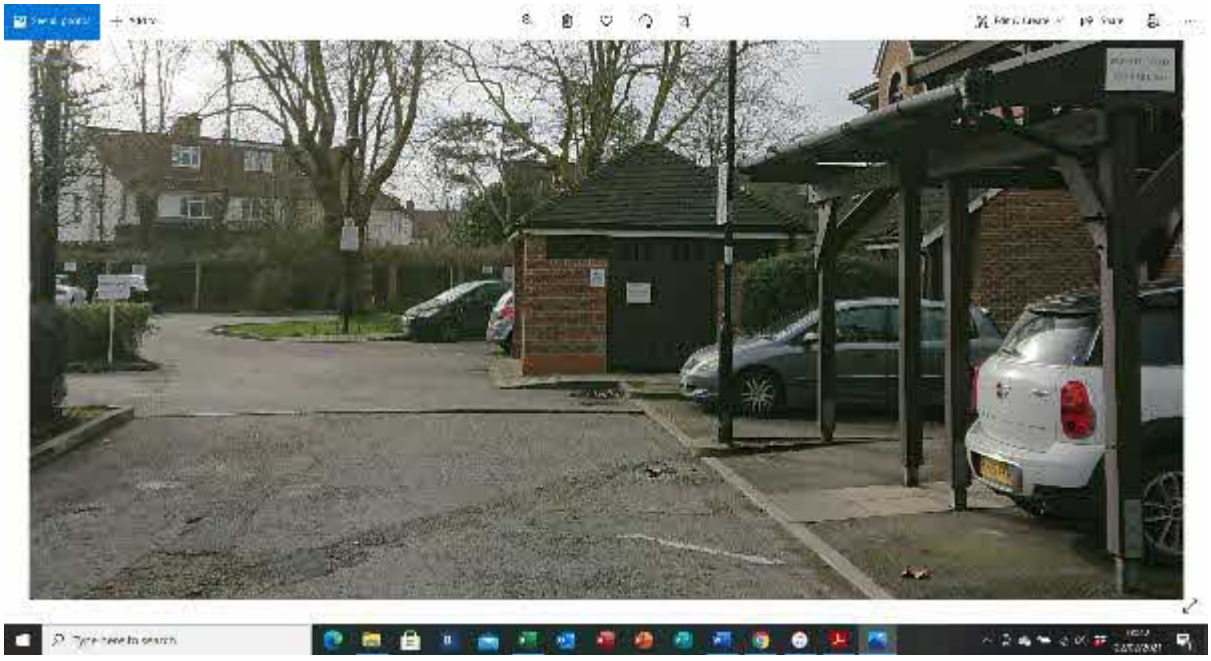
H07:



H08:

H09

H10:



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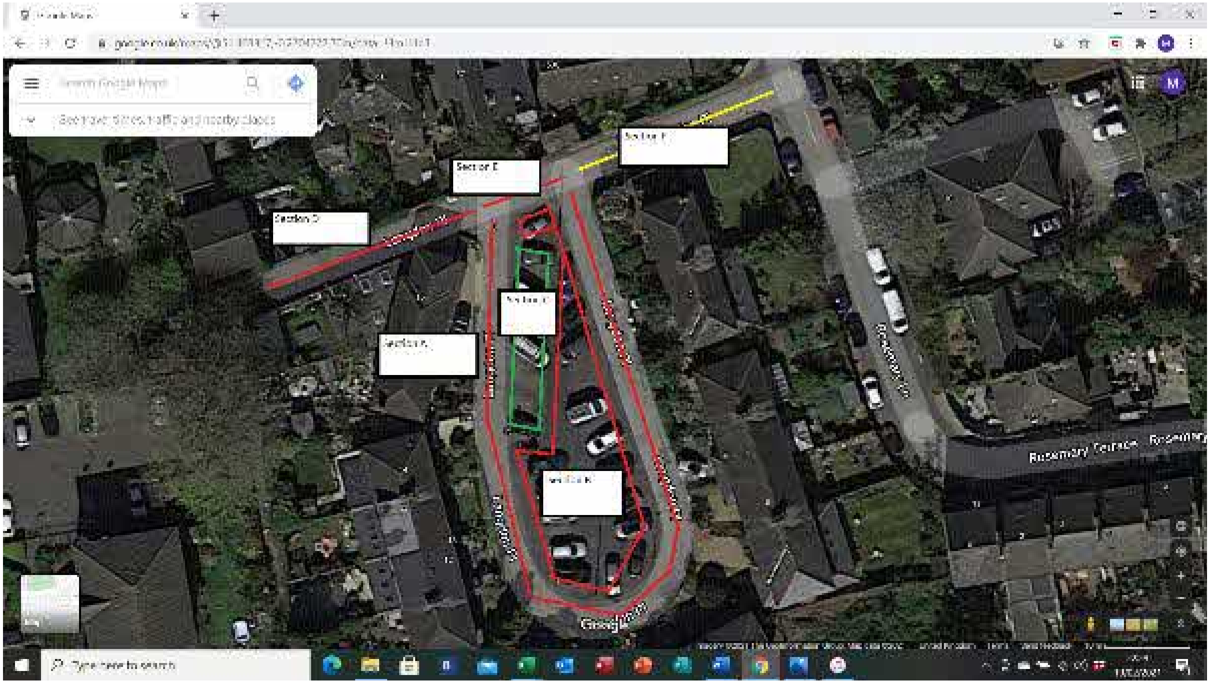

Section D
Section E
Section A
Rosemary Terrace
Google

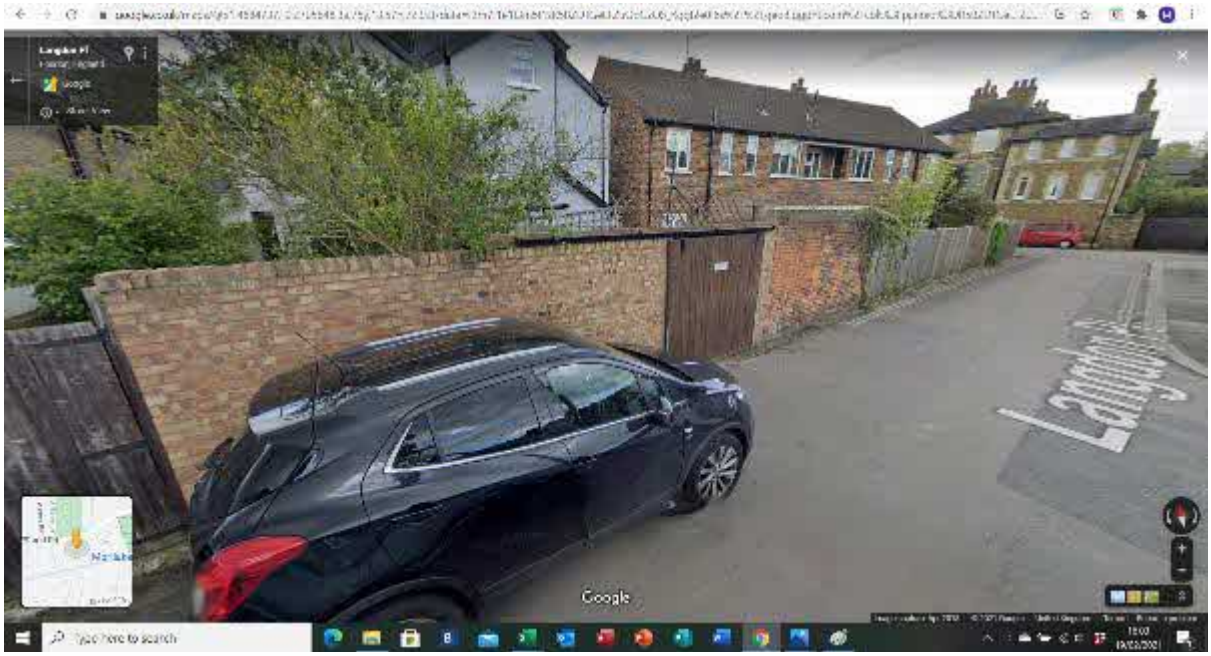
L02:


Google

L03:

L04:

L05:

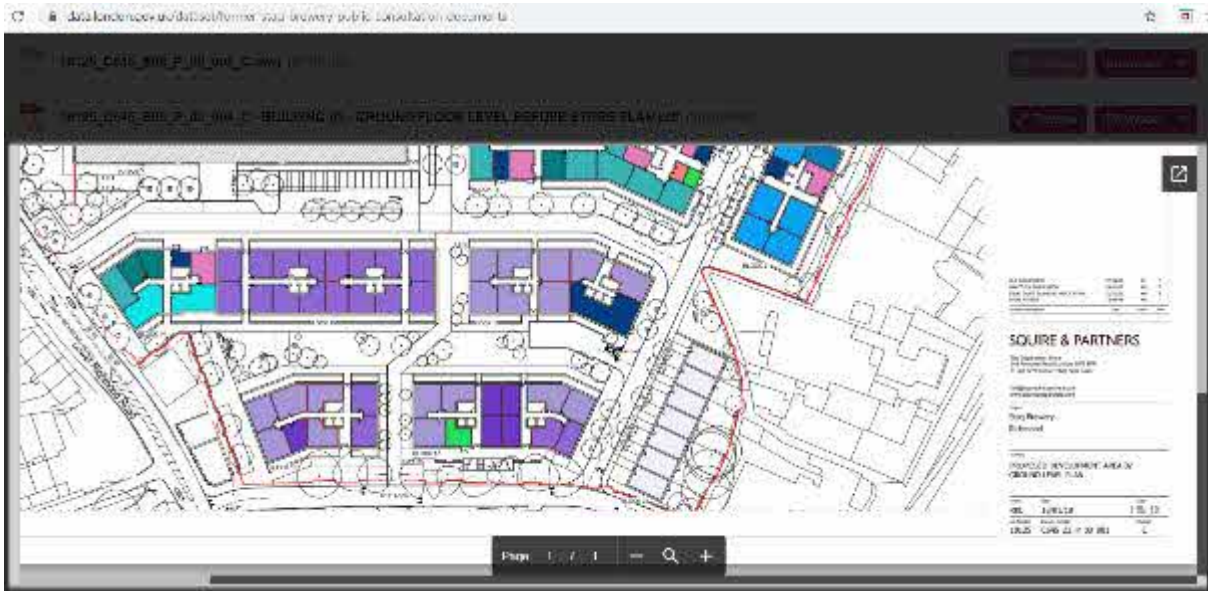


L06:

S01:

S02:

S03:



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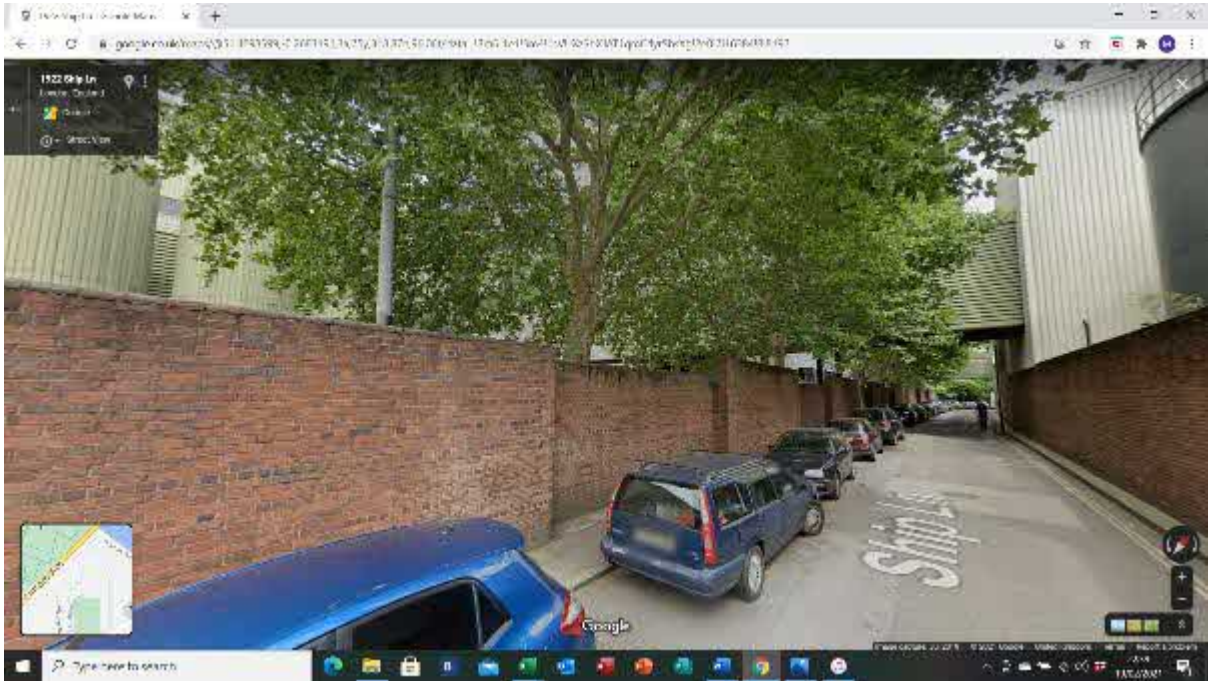

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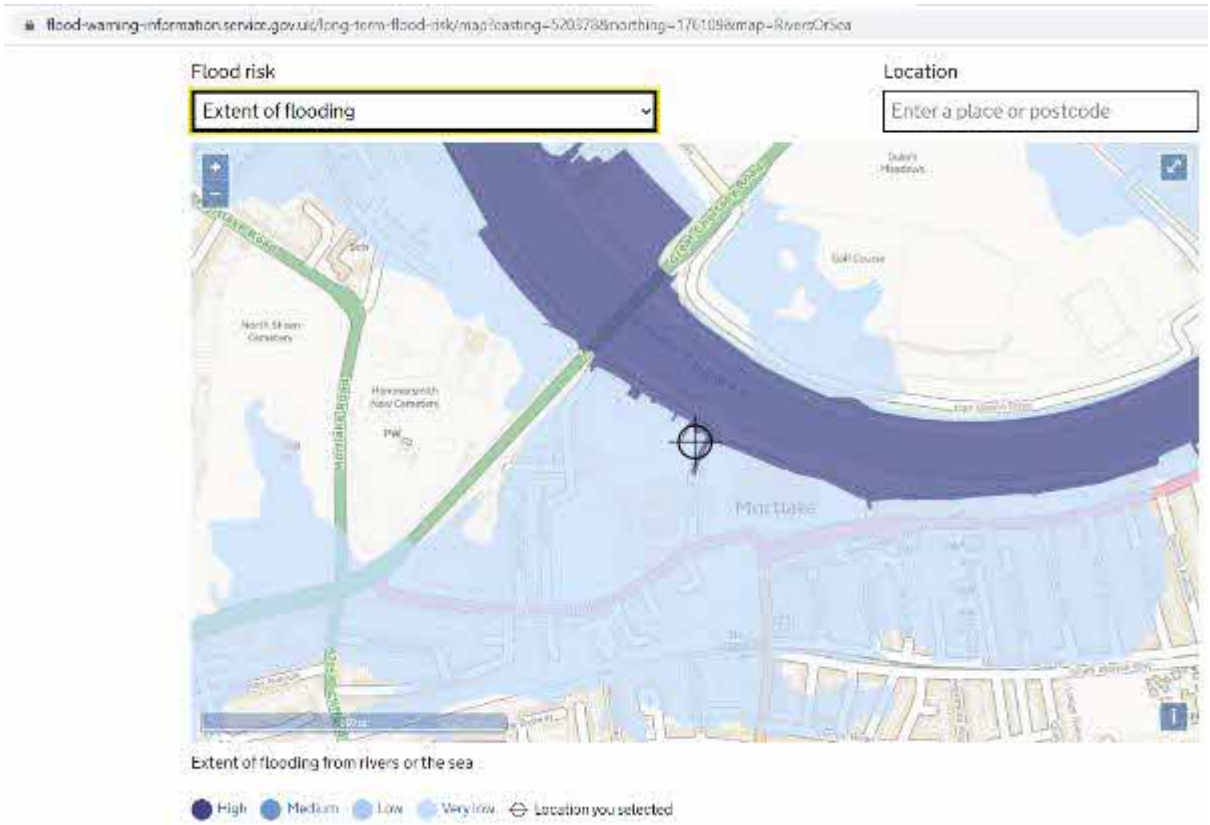
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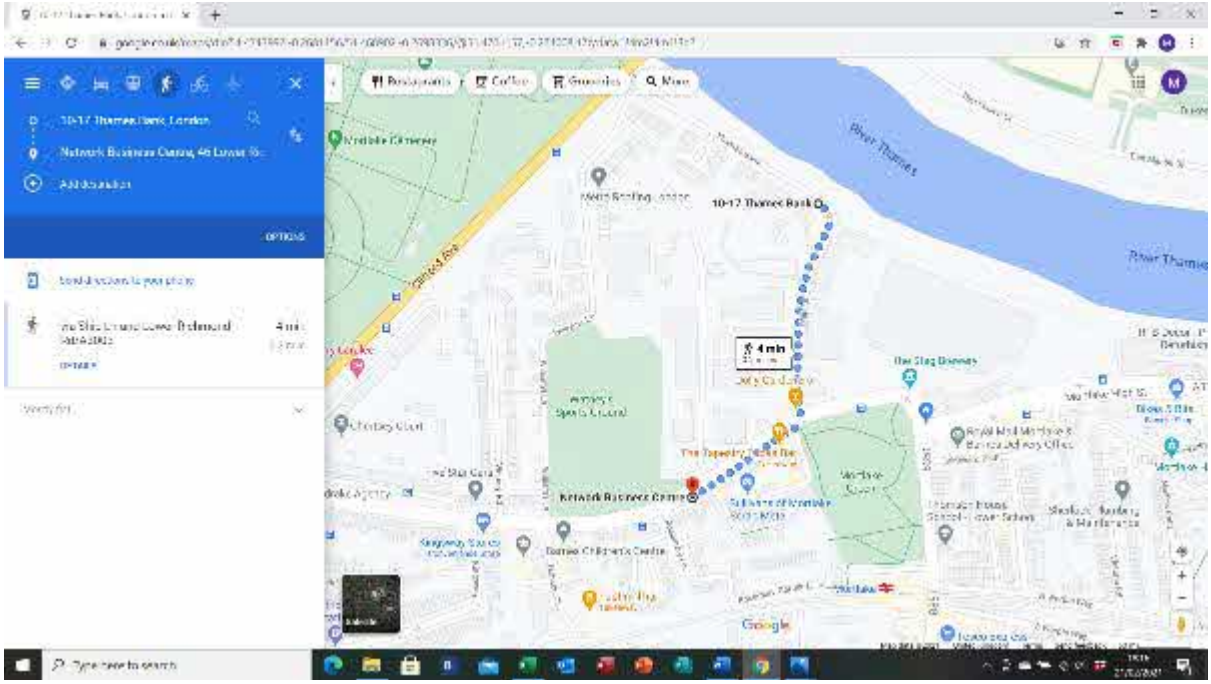
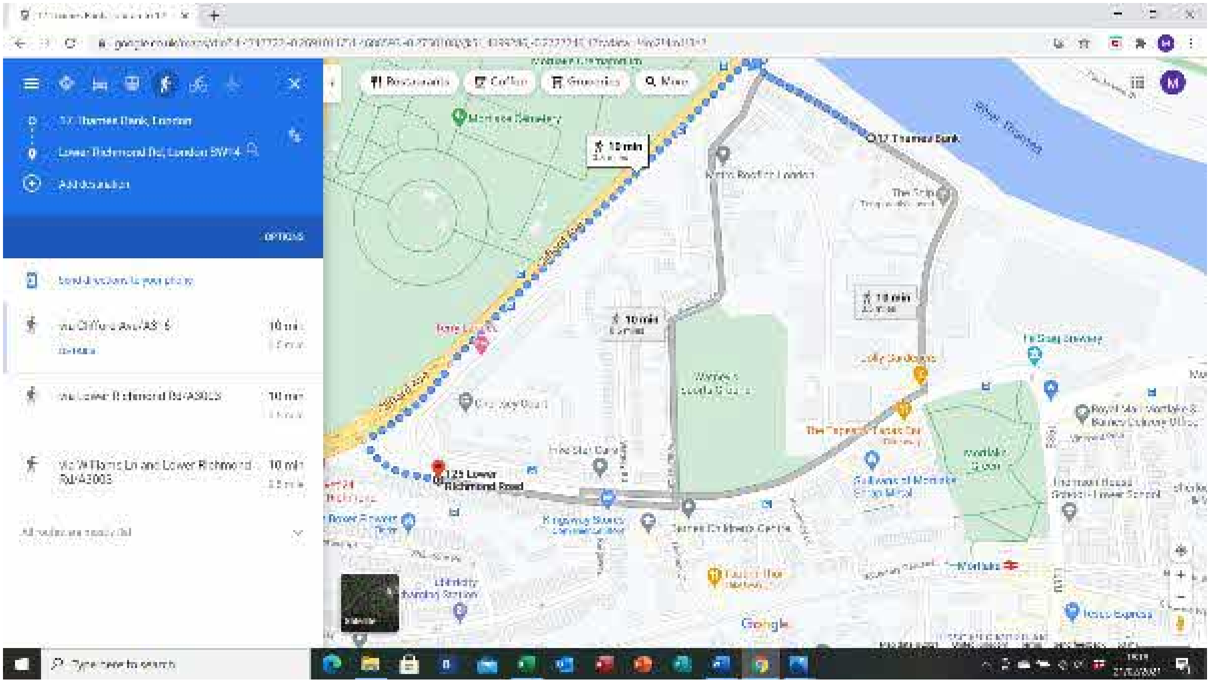
Flood risk
Extent of flooding
Location
Enter a place or postcode
Extent of flooding from rivers or the sea
High
Medium
Low
Very low
Location you selected

T01:


4 min
River Thames
Google

T02:

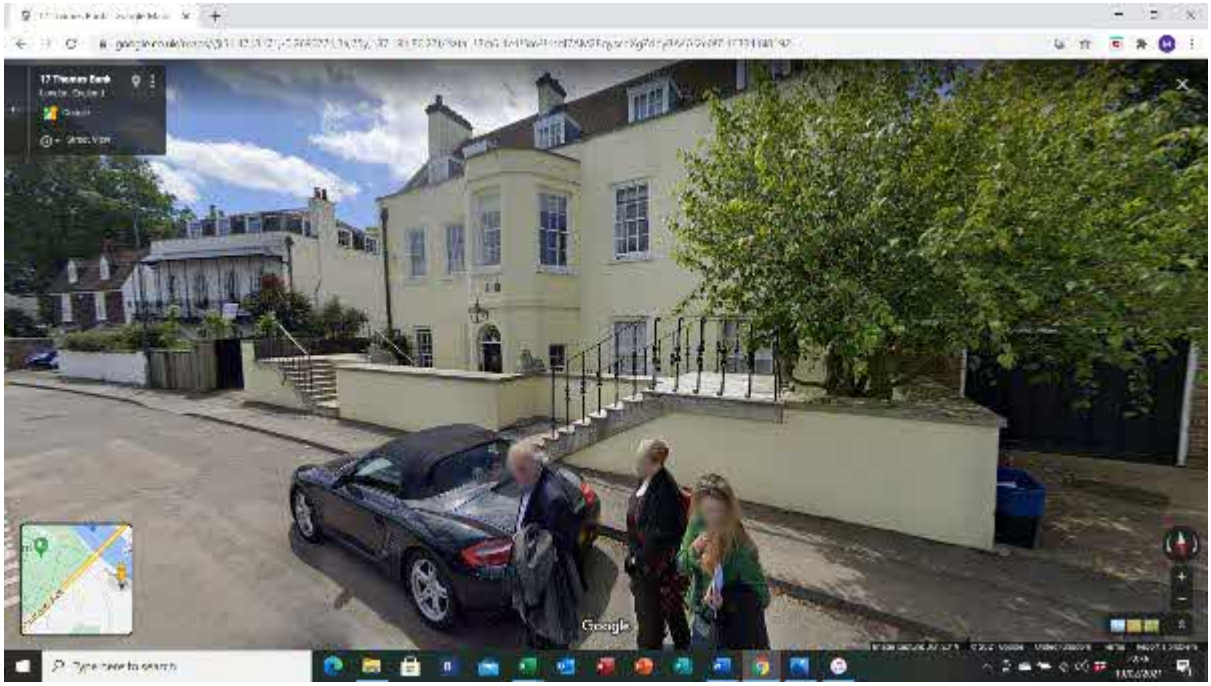

Restaurants
Coffee
Groceries
More
10 min
17 Thames Bank
Google

T03:

T04:

T05:

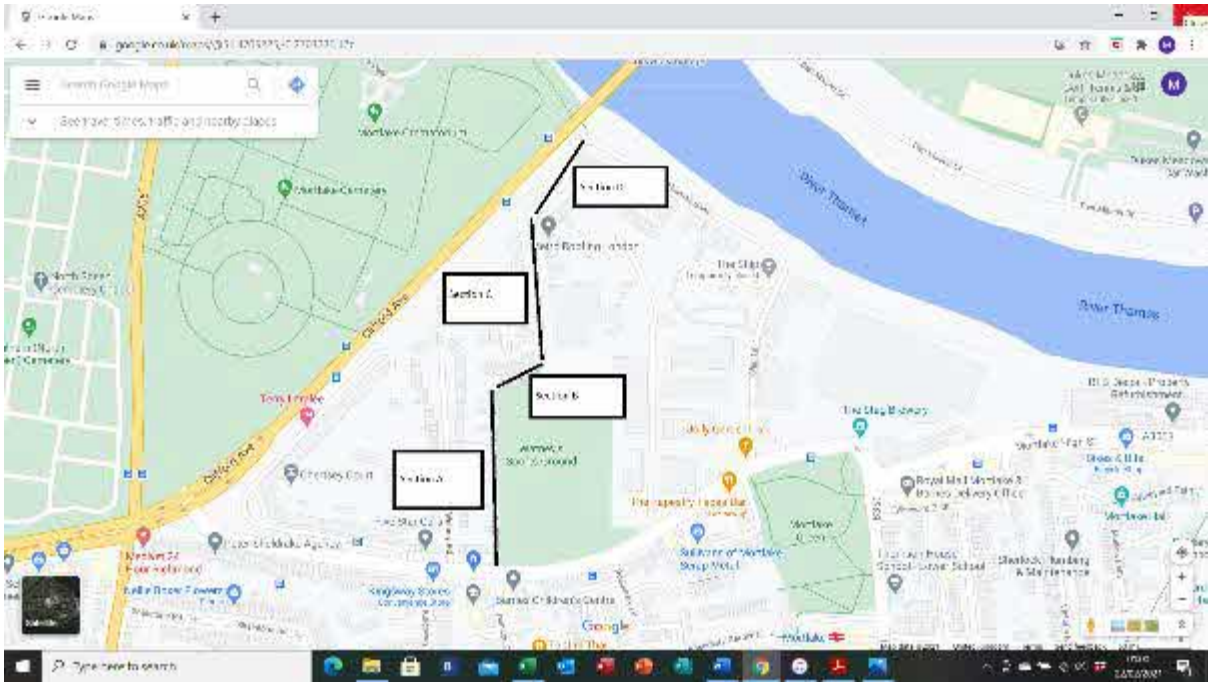
T06:



T07:

T08:

W01:



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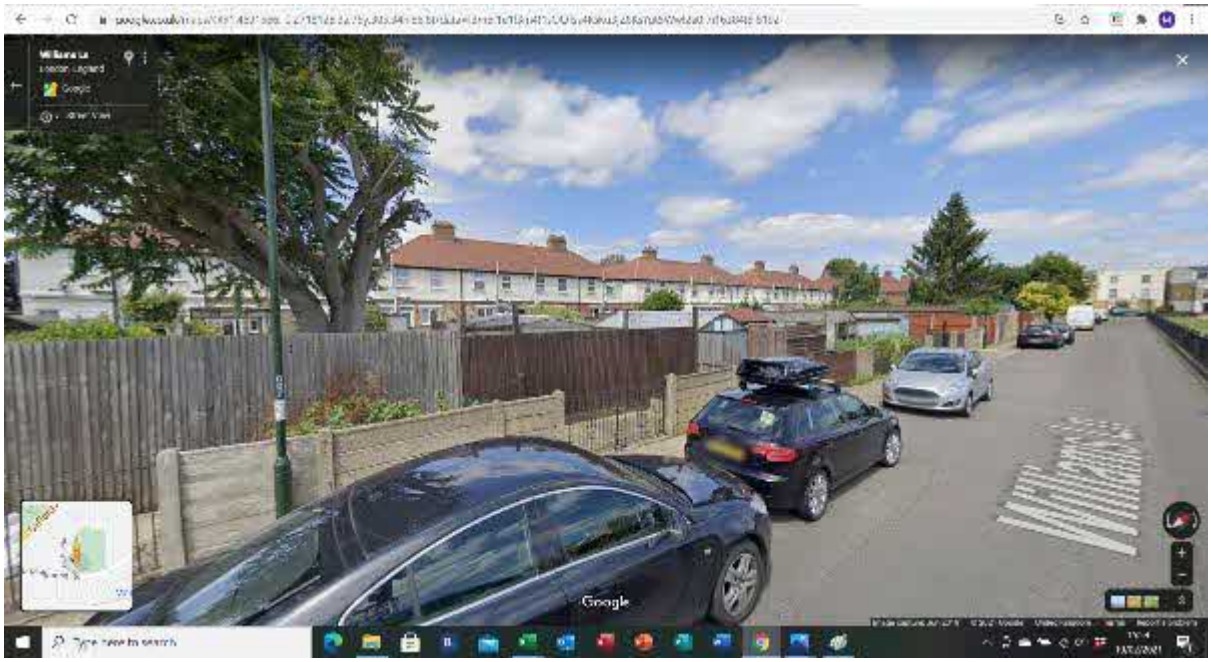

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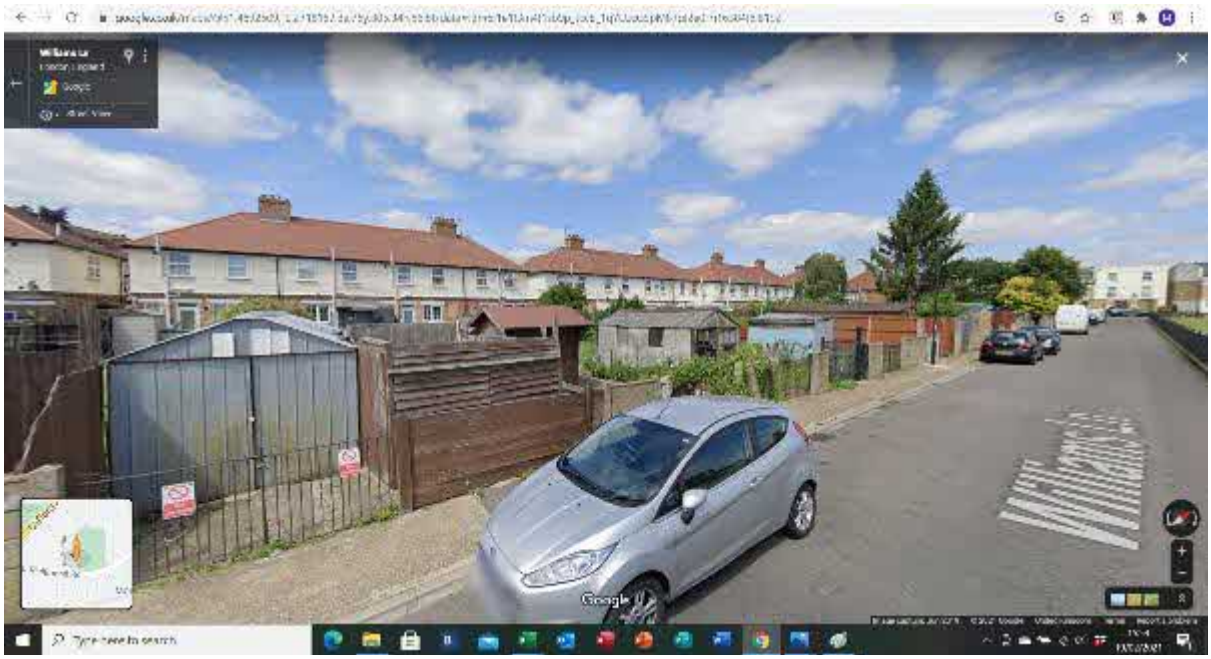

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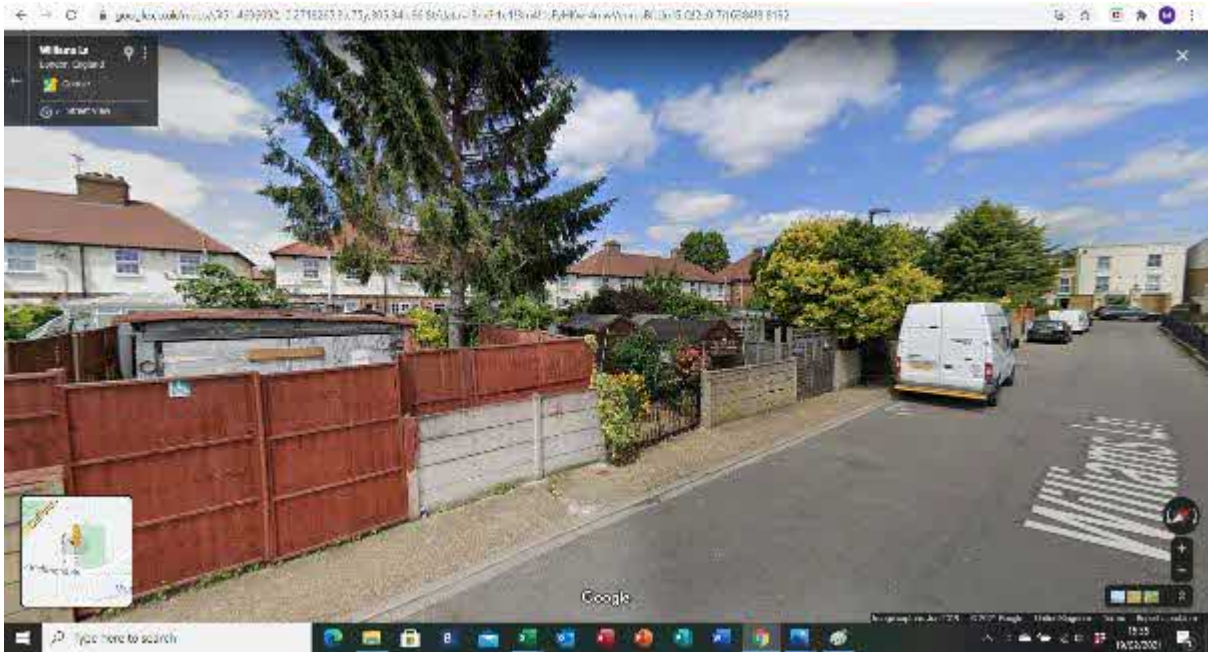

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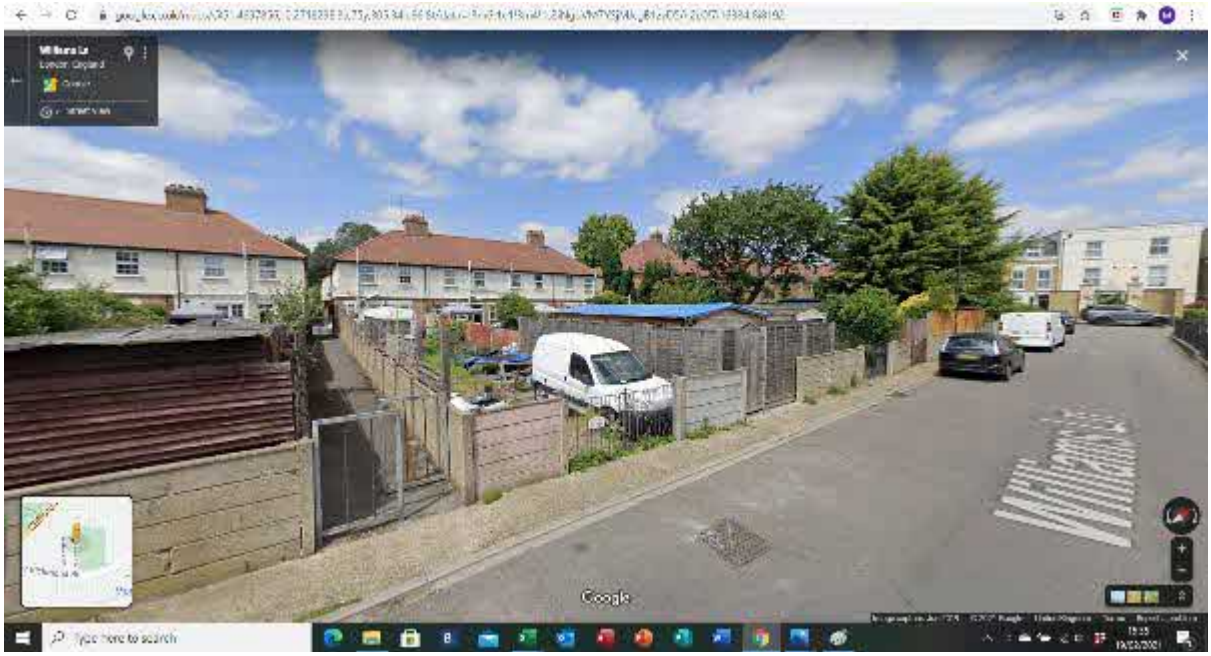

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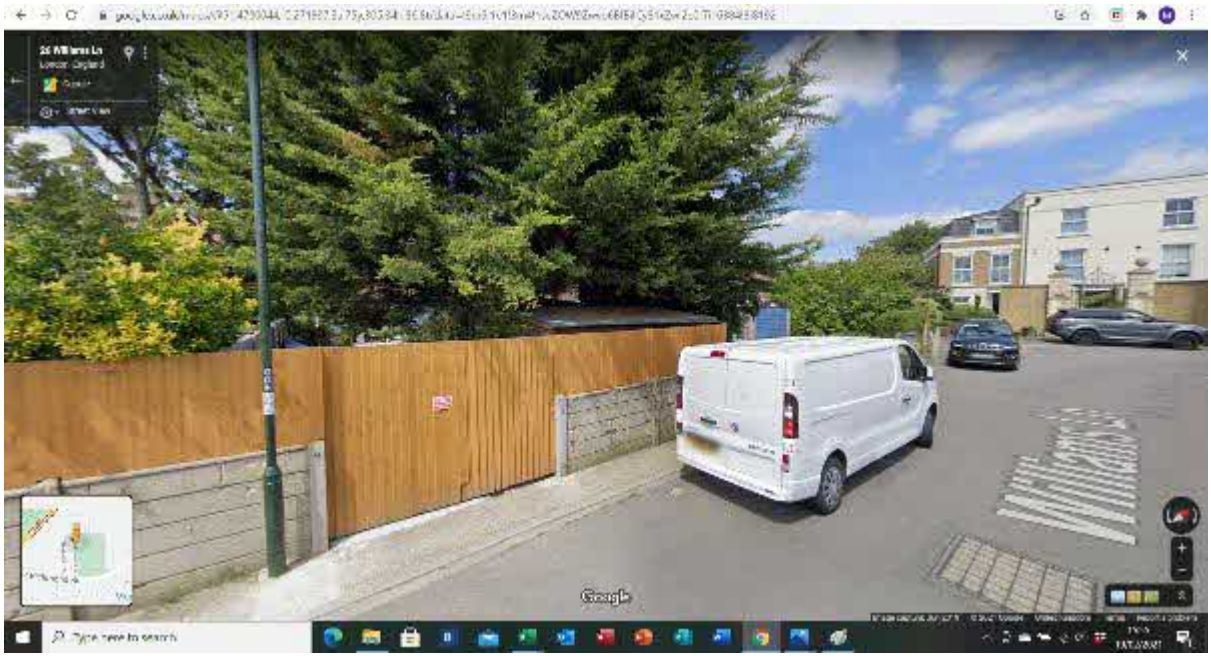

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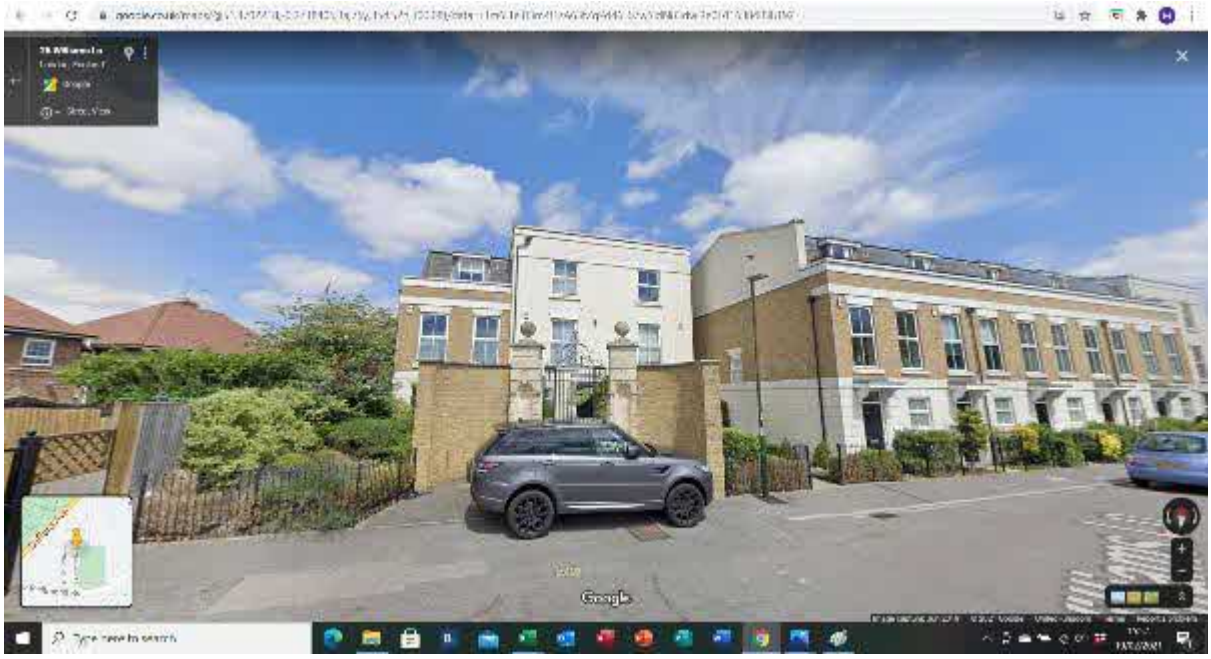

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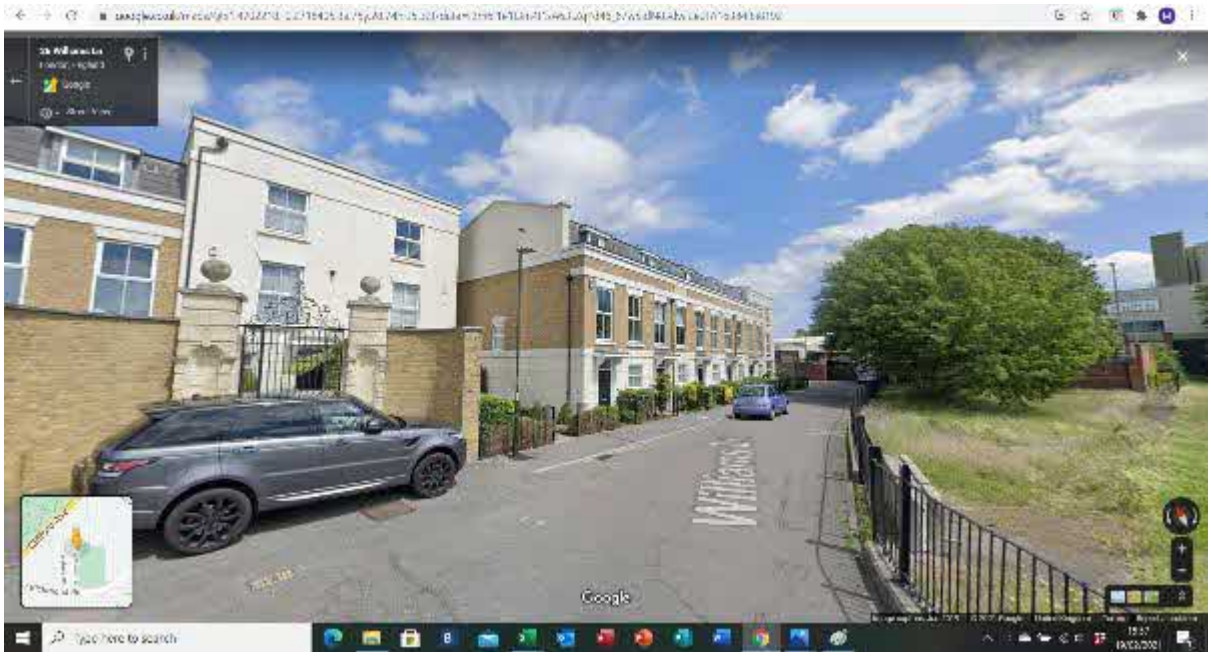

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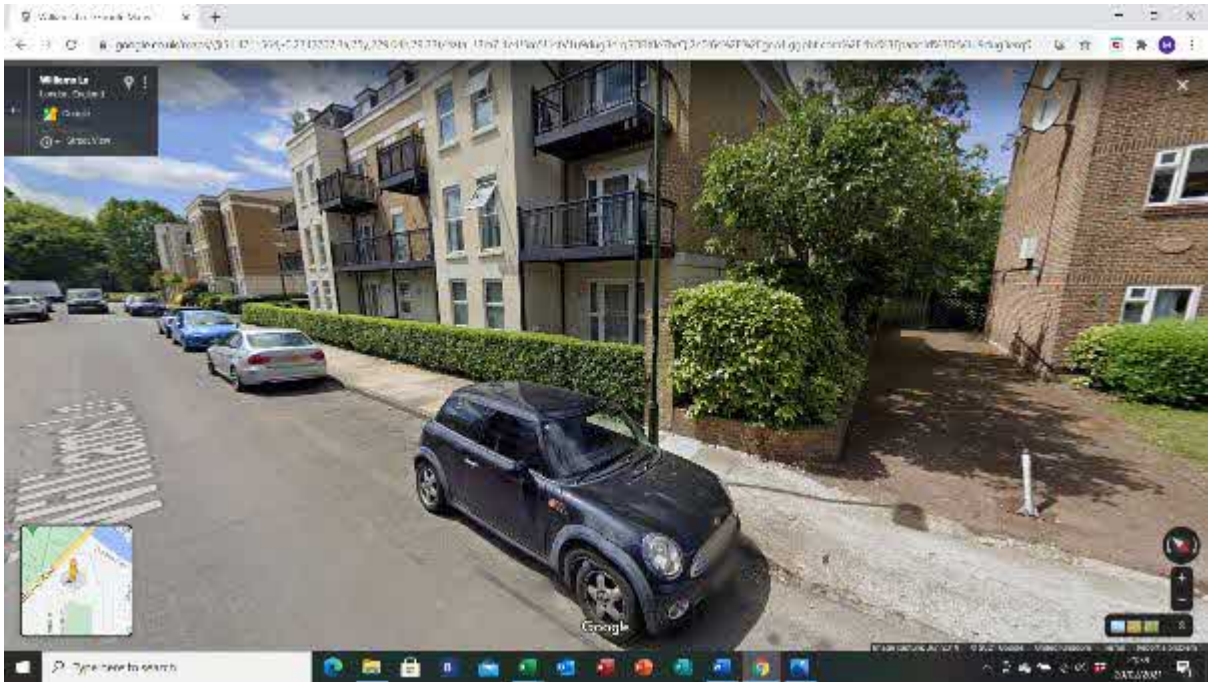

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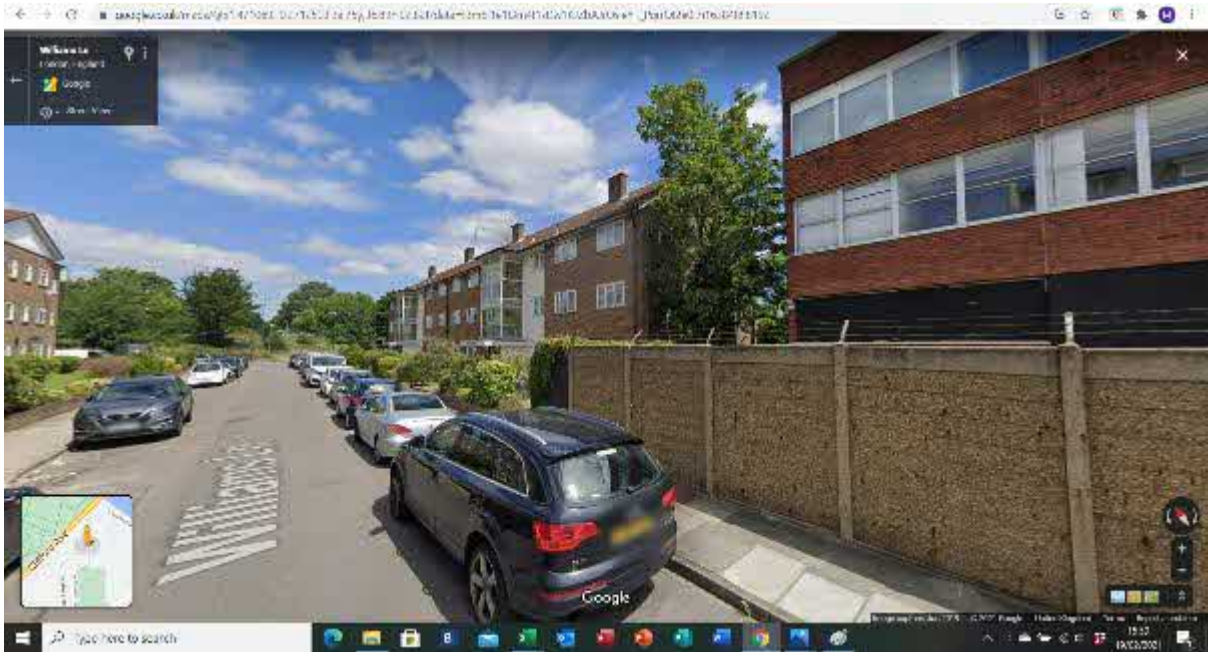

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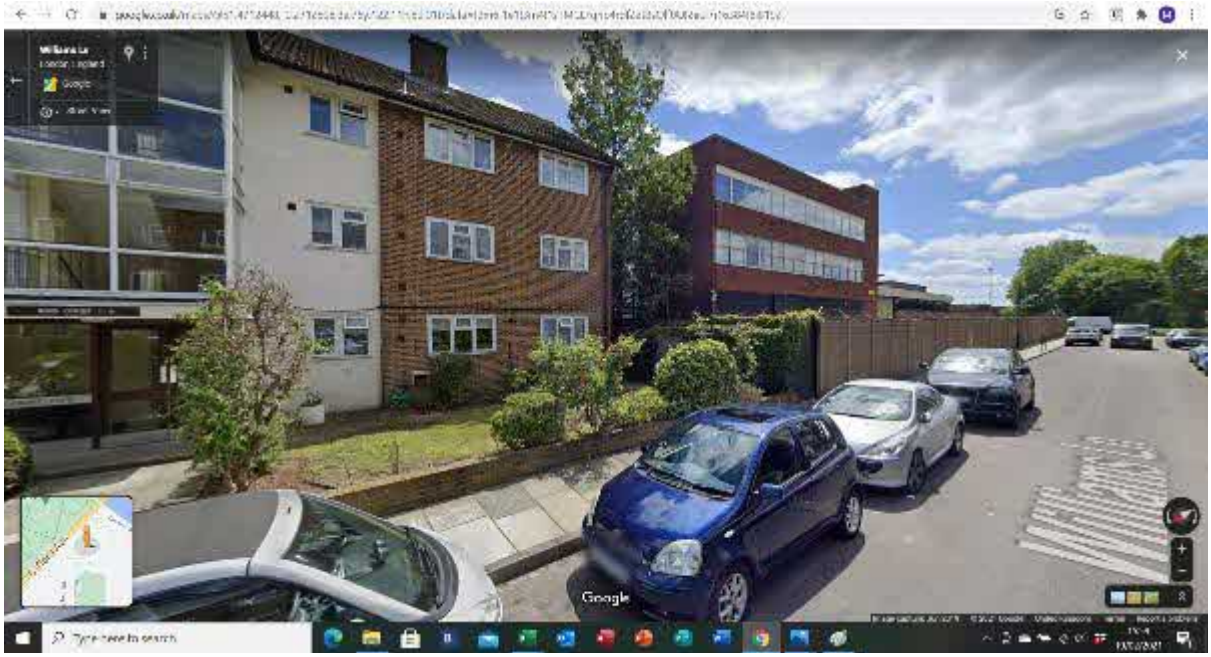

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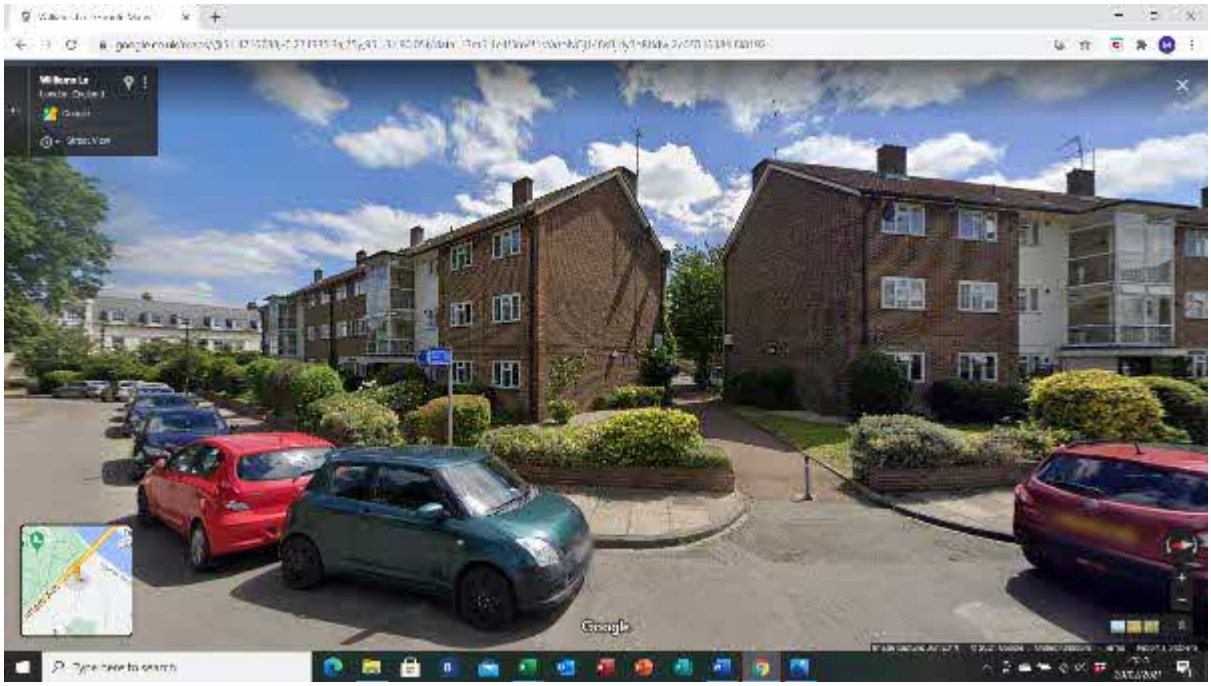

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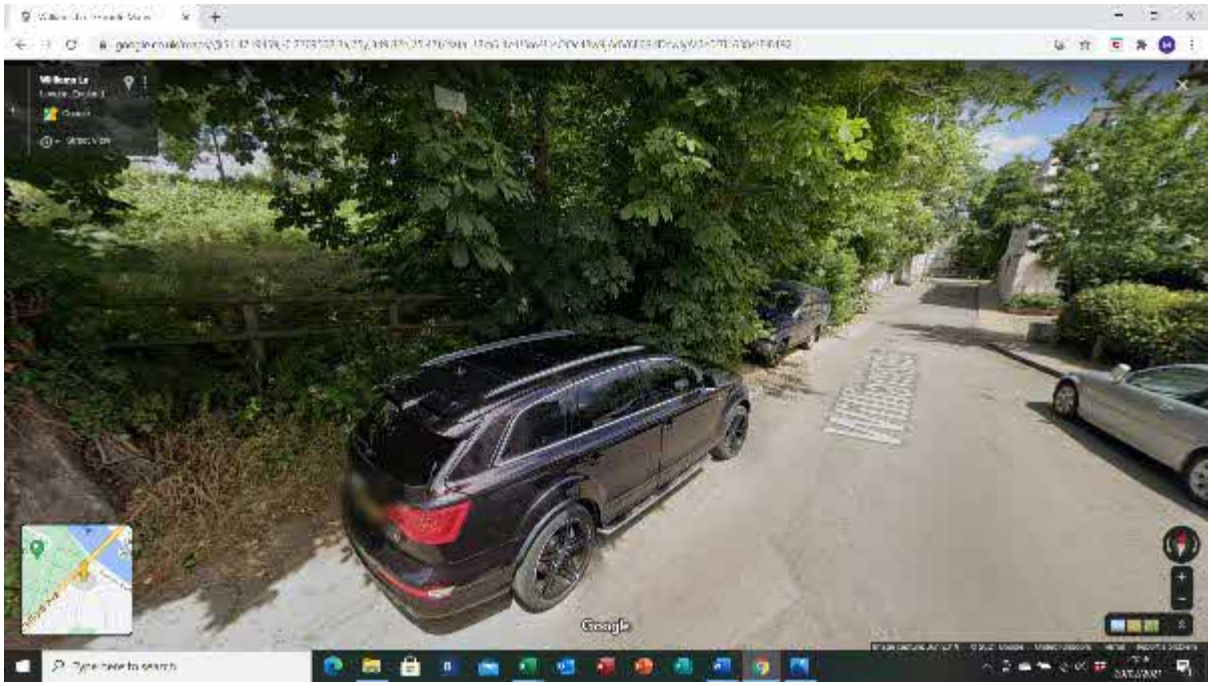

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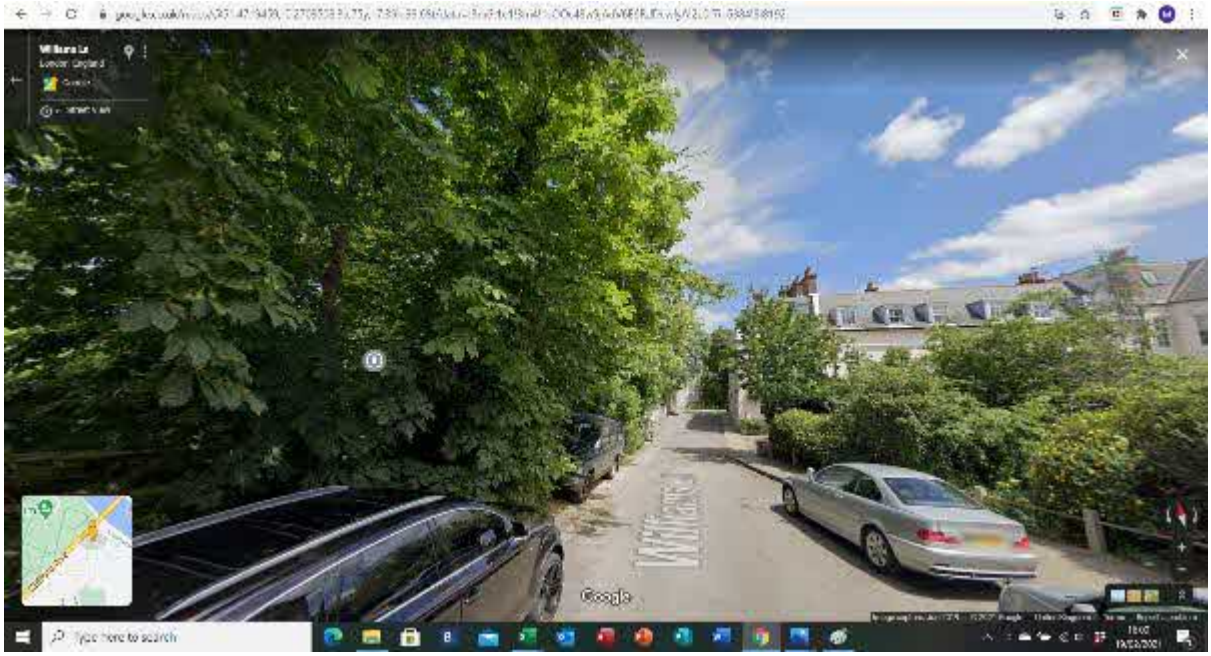

W29:

W30:

W31: