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**From:**

**Sent:**

[REDACTED]  
28 May 2022 15:31

**To:**

**Cc:**

**Subject:**

[REDACTED]  
Objection to 22/0900/OUT and 22/0902/FUL

Dear Sir/Madam

I am writing to object to the planning applications 22/0900/OUT and 22/0902/FUL relating to the Stag Brewery site in Mortlake. I do so as a concerned local resident, whose address is 67 Lower Richmond Road, Mortlake, London SW14 7HH.

My objections are on the grounds of:

1. Local, strategic, regional and national planning policies

You (i.e. the Council of the London Borough of Richmond upon Thames) spent considerable time and effort developing a Planning Brief for the Stag Brewery site that was consistent with local, strategic, regional and national planning policies and had widespread support from local residents when approved in 2011.

The current application deviates from that Planning Brief in three significant ways – all of which have a major detrimental effect. Firstly, the number of residential units proposed to be included in the development is now 1,085 – equating to a density per hectare significantly exceeding the standards referenced in the Planning Brief. Secondly, the maximum height of blocks proposed to be built is now 9 storeys – two higher than permitted. Thirdly, it is now proposed to include a secondary school within the site – instead of the primary school previously planned.

These three deviations cause material negative knock-on impacts on the layout and density of building and on traffic generation. They also necessitate the destruction of the OOLTI-protected grass playing fields on the site – a rare and precious visual amenity.

2. Previous planning decisions

You approved in 2020 a set of applications for the site, despite considerable local resident concern and opposition. Those applications included a total of more than 890 residential units, and it was only after considerable debate that you approved that number – debate required because of your acknowledgement of the negative impacts caused by that number being significantly higher than the number you had implicitly (by means of reference to applicable density policies, standards and norms) authorised in the 2011 Planning Brief.

But the new application proposes 1,085 residential units – more than 20% higher than the figure you recognised in 2020 to be problematically high. Given the considerations you weighed up just two years ago, it would be patently wrong for you now to approve a proposal with this even higher figure – especially as the re-opening of Hammersmith Bridge in the foreseeable future now looks less likely than it did at the time you evaluated and approved the previous application.

3. Layout and density of building

The proposed volume of residential units and the height of the blocks proposed on the site are both very significantly in excess of the norm/average for the surrounding area. Mortlake is – with rare exceptions – a typical suburban community characterised by mainly two-storey houses, whereas the development proposed in the application is typical of the character, density and height of city centre

architecture. The proposed development is profoundly out of character with its surroundings, and exceeds/breaches relevant standards and norms (e.g. the Greater London Authority's London Plan).

#### 4. Traffic generation

The already-excessive-but-now-further-increased number of residential units plus the proposed switch from a small primary to a large secondary school will result in the generation of large amounts of additional traffic – amounts that are unrealistically under-predicted in the application (e.g. massively optimistic estimates about the modality of travel to the school by students and staff, and failure to address the low provision of bus services along the perimeter of the site).

This additional traffic would be generated in a situation in which there is already often gridlocked traffic backing up from Chalker's Corner all the way to White Hart Lane in Barnes along Lower Richmond Road and Mortlake High Street and heavy congestion along Sheen Lane to the junction with Upper Richmond Road.

Mitigation measures proposed in the application are negligible: any positive impact of tinkering with the Chalker's Corner junction seems likely to be small, and there is a material risk of any such benefit being outweighed by its causing an increase in non site-related through traffic exacerbated by the continuing (and apparently indefinite) closure of Hammersmith Bridge.

#### 5. Road access

The site is fundamentally constrained by the River Thames to the north and the Richmond-Waterloo railway line to the south. This squeezes all traffic travelling to and from the site, along with all through traffic travelling along the southern side of the river between Putney and Chiswick Bridges, into the narrow (i.e. almost entirely one-lane-in-each-direction) artery of Lower Richmond Road / Mortlake High Street.

Without (presumably prohibitively expensive) additional elements to the application (e.g. direct road access from the site onto the section of the A316 between Chalker's Corner and Chiswick Bridge, or a tunnel linking the site directly to the South Circular), the lack of road access from the site to any road other than that already-congested single artery is an inherent and insuperable constraint on the suitable density of development on the Stag Brewery site.

In summary, you got it right with your Planning Brief in 2011, in responding to the road access constraint described above with an appropriately-scaled development vision for the site, and your response to the current application should be consistent with that evaluation – reject these excessive and inappropriate proposals and insist on adherence to the already-agreed development vision you sensibly described in that Planning Brief.

Yours faithfully

Mark Worledge