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18.05.2022

Dear Sirs

**Former Stag Brewery - Mortlake. Planning Application A 22/0900/OUT  
Application B 22/0902/FUL**

I write in relation to consultations on the two applications for the Former Stag Brewery Site.

**1.0 - Applications A & B**

The original application proposed 893 residential units in a mixed use redevelopment of this unique riverside site. After the Mayor’s call-in the scheme increased to 1250 units in an attempt to improve the affordable homes provisions but this scheme was rejected by the Mayor. The latest scheme proposes a similar mix of uses with 1085 residential units. This is a 21% increase in the residential units from the original scheme Richmond was resolved to approve, yet there is a negligible increase in the affordable homes provisions.

All schemes have included a 1150 pupil secondary school, which involves the loss of the OOLTI protected sports fields. The ‘re-provisioning’ of this single, large open space is proposed by a series of pocket-sized spaces, most of which are surrounded by tall buildings and many of these are heavily over-shadowed.

Our community has throughout this planning process tried to work constructively with the developer. We note that some improvements to the proposals have been made following comments and suggestions from the community and from the Richmond DRP. However, major concerns and objections remain and these are set out as follows:

**2.0 - Application A - Whole Site Hybrid - Ref 22/0900/OUT**

**2.1 - Density & Scale**

I consider the latest proposals still create a cumulative site density which is too high in relation to the site’s local context and will overwhelm the character and population of Mortlake.

It is understood that large sites such as the Stag site will create their own character by virtue of their scale but the latest proposals go beyond the design parameters of the London Plan and the recognition of ‘village’ areas identified in the Richmond Local Plan.

The layout does introduce welcome permeability to the riverside but the combination of density and building heights will dominate the area and especially the almost rural, arcadian Thames-side setting.

To optimise re-development it is understood that the predominant density and scale in the local environment might be increased to make best use of this site, particularly as there are existing bulky buildings on the western part of the brewery land. However, I feel the transition in density and scale is far too dramatic and harmful and will be quite alien to the existing context, Conservation Areas, and heritage assets. These are views mirrored by the Richmond Design Review Panel.

There remain serious concerns about the bulk and scale of Blocks 18/19 on the west zone and Blocks 8/11/12 on the riverside.

**2.2 - Height & Massing**

The designs have reduced the heights of some blocks from earlier schemes but several still contravene the height limits in both the Planning Brief for this site, but also the 7 storey limit as set out in the Local Plan (height constraints which are now re-iterated in the Pre-Publication Local Plan) - currently in consultation.

The designs now include an 8 storey block to the west of Ship Lane and 8/9 storey blocks directly overlooking the riverside and towpath.

Building heights have been adjusted following DRP reviews, particularly to respect heritage assets, views from Chiswick Bridge, and of the Maltings. However, when the scheme is viewed from the river itself and from downstream towpath views, the Maltings will still be completely obscured and subsumed by the repetition of high mansion blocks spanning from Bulls Alley to the Maltings itself. Currently the Maltings is a landmark building when viewed from both north and south backsides of the Thames. Although the block heights on the riverside have been reduced in height from the

scheme considered by the Mayor, the latest scheme will still obliterate long riverside views of this important historic landmark for ever, which is clearly unacceptable.

In those views of the site from downstream it might be argued by the applicant that the Malting is already shrouded by large industrial buildings. However, those buildings are mostly beyond the Maltings on the western part of the site, not a foreground.

Consequently Blocks 7/8/11/12 will have a far more damaging effect on the Maltings than has been appreciated, and add to the over-bearing nature of those block on the riverside and towpath.

Blocks 7/8/11/12 now modulate from 7 to 9 storeys and although set back from the site boundary will still dominate the the almost rural nature of the towpath. This extreme of contrasts is also evident in the open spaces created between these blocks. These are characterised by formal landscape arrangements and tree planting, which creates an inappropriate and uncomfortable relationship between the new and the existing rural landscape environment. A point again picked up by the Richmond DRP.

Block 10 has been increased to 7 storeys. The verified views from Mortlake High St appear to indicate that this may be valid in relation to the other new blocks and given the scale and height of Vineyard Heights. As this contains part of the affordable home provisions it might be considered acceptable but is nevertheless in conflict with the Planning Brief (now supported by the Pre-Publication Local Plan), which requires buildings to decrease in height at the boundary edges from a 7 storey maximum in the more central areas of the site.

I have no issue with the increased height of Block 1 - the Cinema building.

The re-introduction of the townhouses in the north west zone is welcomed.

### **2.3 - Traffic**

Early local consultations, before the site was shut down and sold, highlighted increased traffic as the most concerning aspect of the site's redevelopment.

Traffic in the area is already dire and at times grid-locked, and this was before the closure of Hammersmith Bridge. These deep concerns remain, especially now, with huge increases in post-Covid on-line delivery services for 1085 homes and the other commercial uses, and especially with the continued closure of Hammersmith Bridge.

There is simply no foreseeable prospect of the bridge being re-opened given the stalemate about funding. The developer's submitted phasing strategy would see the Stag scheme completed by 2028/29 - Long before the Bridge could be repaired and again operational for vehicles assuming of course that funds were eventually forthcoming from TfL / Central Government. It is clear the local Councils at Richmond and Hammersmith don't have the necessary funds, and more recent financial pressures for local councils only make matters worse.

The applicant's consultants proposed major works at Chalker's Corner to mitigate for the scheme with 893 residential units, commercial uses and the secondary school. They stated that some 50% of the am peak would be generated by the school, and that situation remains unchanged for many years until any Green Travel Plan targets can be achieved - and verified.

At the 2020 planning committee meeting the school's 50% contribution to peak traffic loads was challenged by committee members but with no data/survey justification.

The latest scheme has reduced the parking numbers, but there are still just under 500 spaces, yet physical traffic mitigation is now proposed by merely one additional LH lane at the Chalker's Corner junction. This is simply implausible.

There is a proposed 106 Agreement contribution for improved bus services but whilst the existing residents' parking remains on the western end of the Lower Richmond Road, this is more likely to impede traffic and bus services rather than assist. It is understood that Richmond do not intend to remove those existing residents' car parking spaces.

By contrast there are only 12 parking spaces for a secondary school which will employ at least 150 staff, will have regular visitors, and has a 6th Form entry. Even with Green Travel Plan initiatives this is completely implausible. There are also just two bus parking spots for a school of this scale this seems inadequate. School buses for the Harrodian and St.Pauls already use parking space on Mortlake High St, until such time as they can pick-up nearer the school exits.

With 1150 pupils and staff arriving and leaving each day mid-week then there will be a considerable footfall using the crossings on the Lower Richmond Road and Mortlake High St. This will significantly hold up traffic in the am peak times and also in the pm period, given the changes on traffic patterns with Hammersmith Bridge being closed and the South Circular being almost constantly congested/at standstill.

Barnes High St is already a major bottle-neck as is Sheen Lane and White Hart Lane, exacerbated by the level crossings. All these pressure points will simply become unbearable in terms of traffic, safety and air quality. Proposed mitigation measures at the Mortlake Station/Sheen Lane level crossing are merely behavioural nudges and will do almost nothing to relieve congestion nor improve personal safety at this dangerous crossing.

Serious efforts on the part of the developer and the Council to increase use of the river both for demolition/construction and for resident commuting would be excellent use of the very substantial Community Infrastructure Levy monies ( £47.67m), which the development will provide. A far stronger requirement should be imposed to maximise use of the river.

#### **2.4 - Affordable Housing**

There has been a negligible increase in the provision of affordable homes in this scheme despite a 21% increase in unit numbers from 893 on the original scheme considered by Richmond.

We appreciate that construction costs have risen and that the energy strategy has had to respect the new London Plan. CHP gas power is now replaced by air source heat pump systems. However, the major costly road junction works at Chalker's Corner are now excluded, and the basement parking construction has also been reduced significantly, both of these will have accrued substantial cost savings on the earlier 2020 scheme.

Furthermore values for residential units will increase especially as any scheme evolves and matures on site. This is a very desirable borough and riverside location.

There are also more units proposed at higher floor levels now and these would attract premium values especially given the riverside location and panoramic views.

The Mayor rejected the larger scheme in part because the affordable provisions were too low in quantum. The latest scheme does not comply with either the London Plan or the Local Plan in terms of meeting affordable housing quantum or tenure.

### **3.0 - Secondary School - Application B 22/0902/FUL**

#### **3.1 - Need**

The community has done much to highlight the questionable need for a new 1150 pupil secondary school, other than providing for pupil/parental choice, but DfE funding is based on needs only.

Alternative options to satisfy future school place needs have been put forward by the community during the design consultation periods but have been dismissed without proper and full investigation. We have simply been informed those alternatives are not feasible.

Latest data clearly shows that a school of this size with 6th Form is not justified. Dramatically falling primary pupil numbers back up this assessment, as does the ONS's predictions for falling population numbers, particularly in this borough.

Even potential pupil yields from this Stag development and other proposed local schemes do not justify a school for 1150 pupils. There is also a genuine risk of harm to the two other local schools, particularly the viability of their respective 6th Forms which remain under-subscribed.

#### **3.2 - Site Area and External Space**

Urban and sub-urban space within London is precious and needs to be used effectively and optimised, but it was never intended that the sports fields could be developed - more that they should be retained and used more.

There has never been any scheme, or attempt, to site the school on the remaining land within the Stag site. The site owner was always aware that the sports fields are protected and were required to be retained.

As a result the proposed design creates a school site area which is some 30% of the size recommended by the DfE.

Furthermore, if the all-weather sports pitch is being used then the remaining 1000+ pupils have totally inadequate safe, open space in the remaining site plot for recreation and break-out. So much so that roof top play space was required on the earlier proposals.

The school is not necessary and is shoe-horned onto a totally sub-standard plot.

#### **3.3 - Secondary School and Loss of OOLTI protected Open Space**

The location of the school results in the loss of the OOLTI protected sports fields. These are quite simply NOT re-provisioned as required by Policy in terms of quality, quantum and openness.

#### **3.4 - Quality**

In terms of quality the existing sports fields are one large open space with wide vistas from the surrounding area. They also accommodate sports use and other local events by long-standing

owner agreement. The space is enjoyed by existing residents who over-look the sports grounds and is a fine introduction to Mortlake when visiting or passing through from the west. Football and cricket have been played on the natural grass fields for many years. With these design proposals use for cricket is lost for ever, and football on natural grass is also lost. Barnes Eagles who use the grounds have to be re-located and they secure over £100,000 in the draft 106 Agreement for alternative pitch use. Those monies could be used to better effect - grass re-reinforcement of the existing retained surfaces, which would be FA/Premiership compliant. The sports uses are not re-provisioned in terms of quality. The sports fields are just over 2.0ha in size. No comparable space is provided in terms of spatial quality.

### **3.5 - Quantum**

Planning Officers calculated that the previous 2020 scheme re-provisioned the sports fields in terms of quantum. We have calculated the area of individual new open spaces and these provide well below 2.0ha in total. The new community park area had previously been calculated incorrectly by Officers and should exclude the land reserve for TfL.

The fenced artificial pitch next to the school was included as re-provisioning in Officers' 2020 calculations. Of all the OOLTI spaces in the borough and by definition of OOLTI there seems no justification for including an artificial, fenced-off, screened, and floodlit all-weather pitch as OOLTI re-provisioning.

Even including the Green Link (which was meant to be provided **in addition** to the retention of the existing OOLTI sports fields), the area created by the nine new open spaces totals just 11,232 sq.m. - just 50% of the existing 2ha.

Furthermore the daylight/sunlight report indicates that some of the new open spaces will be significantly over-shadowed for large parts of the years - some 70-100% in shadow with less than 2hrs of sunlight exposure on 31st March. ( A BRE measure).

the Maltings Plaza and Bottleworks Square are both almost completely hard surface area and would surely not be recognised as OOLTI in normal classifications/assessments. The Richmond DRP have also noted this and proposed more green space and less hard surfaced areas.

Even including these two spaces the total quantum is still only 11,232 sq.m.

### **3.6 - Openness**

Nine pocket-sized open spaces, one as small as 299 sq.m and three between 713 -780 sq.m can hardly be compared with one large space of 2.0ha.

The Green Link and its connected Maltings Plaza do create an attractive space connecting Mortlake Green and the riverside but this space was required in any case to comply with the Planning Brief.

The existing sports fields are by their nature open. The new spaces are surrounded and over-looked by buildings from 3/4 storeys up to 9. This is hardly a definition of openness. They are also significantly overshadowed, further reducing any feeling of openness.

On all three counts in terms of OOLTI re-provisioning the latest scheme does not comply with planning policy.

### **4.0 - Summary**

Although there are a number of aspects of the latest proposals which are positive, and some which make improvements on earlier schemes I regret that for the reasons outlined I must formally object to both Application A and B.

Peter Eaton ARB RIBA FRIAI