London Borough of Richmond upon Thames

Development Management

2ndFloor

Civic Centre

44, York St

Twickenham TW1 3BZ MBCG 11.01.2023

Dear Sirs,

***Former Stag Brewery Site - Application A Whole Site - 22/0900/OUT***

 ***Application B School 22/0902/FUL***

We write on behalf of the Mortlake Brewery Community Group in relation to the recent round of consultations concerning the two planning applications noted above. These latest consultations are held as a result of changes to the proposals previously submitted in spring 2022. Many of these latest changes relate to revisions to the fire strategy and building regulation amendments for the individual building blocks. This has led to a small reduction in the total number of residential units, minor changes to other building use floor areas, and revisions to plans and internal floor layouts.

Many Technical and support reports have been supplemented or updated.

Fundamentally however, the proposals remains much the same as the design submissions in March last year in terms of scale, density, massing, building heights and the consequent effects on the local environment and highway network. Hammersmith Bridge remains closed with absolutely no prospect of returning into operation for vehicular traffic and public transport services.

On this basis our earlier objections to both Applications A & B remain as set out in our previous representations submitted 21.05.2022 with the key items covering :

***Buildings Heights, Development Scale & Massing***

The scheme remains too dense and too high with many blocks exceeding the height limits set out in the Adopted Planning Brief and Local Plan Policy. ( and the Pre-Publication Local Plan). Blocks still dominate the Riverside setting - a view also highlighted by your own Design Review Panel (DRP). The Maltings, a key local Heritage asset and landmark, is still subsumed particularly by the height and proximity of Blocks 2 & 3.

We were reasonably comfortable with the height of Block 10 on the High St. We understand this height optimisation on the High St was encouraged by your DRP, but see this has now been lowered by one floor with the loss of precious affordable units. This location does seem less visually sensitive compared to the scale of the blocks next to the Maltings, the main heritage asset on the Stag site addressing the Thames riverside.

***Affordable Housing***

Despite the increase in residential units to 1071 from 813 in the 2020 application the proposed affordable housing is woefully low. There is no definitive percentage committed to in the latest documentation with the composition still, *‘’subject to negotiation’’.* The documents quote 39 Intermediate units and 165 Social Rent. This represents just 19% of the 1071 unit. This contravenes Local Plan and GLA Planning Policy in terms of quantum and mix.

***Infrastructure, Highways & Access***

Traffic generation, congestion, safety, and air quality remain major concerns to the local community given the cumulative scale of the proposals and just one road providing access/egress. A left-turn slip lane is proposed at the western end of the Lower Richmond Road but the movement constraints at Chalker’s Corner and Mortlake Level Crossing remain massive obstacles and safely concerns. Future developments on the Homebase site and Barnes Hospital site will only add to the existing traffic log-jams which over recent years occur beyond normal am/pm peaks. The morning arrival of 1250 pupils crossing the single access road will make traffic conditions intolerable.

Theoretical upgrading of PTAL accessibility outlined in one of the Technical Notes is quite implausible and simply ignores the reality on the ground and local residents’ day to day experiences.

***School & OOLTI***

The predictions of future school place needs which underscore the proposed school remain deeply in doubt, and have been consistently challenged by the local community. There has been no parental clamour in support of this proposed school.

The Education & Children’s Services Committee have rejected the Jan 2023 version of the School Place Planning Strategy and the need for the new school on the Stag site remains unsubstantiated.

The proposed school plot is woefully small. We understand the pressures on land in London but a site which is just 30% of the site area recommended by the DfE is just sub-standard for 1250 pupils.

The proposed siting of the school necessitates the re-provisioning of the existing OOLTI protected Sports Fields; the largest green open space in Mortlake.

The proposed OOLTI re-provisioning is quite simply not achieved by the nine pocket-sized open spaces which are enclosed and over-powered by densely packed, tall building blocks. Because all of the blocks have been increased in height compared with the 2020 scheme these small spaces are even more over-shadowed and enclosed as the technical daylight/ sunlight data clearly illustrates.

Two spaces are hard-surfaced (Maltings Plaza and Bottleworks Square). The Richmond Design Review Panel has stressed the need for less hard surfaced areas and more soft green.

The existing OOLTI protected open space is simply NOT re-provisioned as required by policy in terms of - *quality, quantum and openness* - and thus is in direct contravention of Local Plan Policy.

There are no mitigating factors which could ever side-step this Policy.

In any case, any large redevelopment site such as the Stag scheme would necessitate open space between and adjacent the buildings regardless of any additional OOLTI re-provisioning requirements.

Our earlier representations have outlined further detailed points which remain despite these latest design changes and amendments.

For these reasons and the key points highlighted above both interlinked planning applications should be refused.

For and on behalf of MBCG