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Planning Department
York House
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6 January 2023

Dear Sir/Madam,

I have now looked at the latest plans for the redevelopment of the Stag Brewery Site, Mortlake and I wish to confirm my objection to Application A - 22/0900/OUT and Application B 22/0902/FUL

First may I say I am deeply disappointed that a Lib Dem Council is effectively adopting the plans of the previous Tory Council.

The latest set of consultations appear to have been only modified to comply with the latest building regulations and do not take into account the objections of the community to what will be an overdeveloped site with a dangerous lack of proper transport support, particularly for lots of schoolchildren at the beginning and end of the school day.

However, the proposals and latest changes still do not address any of the earlier significant failings of the application. I summarise them as follows: -

Applications A & B

Density, Building Height & Scale of Development

- The scheme now proposes 1071 residential units, which is only a minor reduction of 14 from the March 2022 submission, and thus remains far too dense given the the severe and unique access constraints of this site.
- The Council's own Design Review Panel (DRP) - "felt the scheme is too dense for this area - and resonates more with Central London where higher density is expected." (DRP letter 28.02.22).
- Many of the residential blocks still exceed 7 floors in height and overwhelm the character of the Thames bankside setting and still dominate the locally protected Maltings building and adjacent heritage assets. The densely packed blocks combined with their height and scale will destroy the beauty of this unique stretch of the River Thames.
- Furthermore, those buildings above 7 floors contravene both the original Planning Brief but also the Local Plan and indeed the Pre-Publication Local Plan. There are absolutely no mitigating factors which could justify any relaxation of Policy.

Affordable Housing

- Building 10 has been reduced in height by one floor which is welcomed, although it reduces the number of Intermediate-Affordable residential units. There is a desperate shortage of Affordable and Social Housing and too many houses for the wealthy. The affordable percentage of housing remains exceedingly low at around 19% - (39 Intermediate units and 165 Social Rent).
- The Financial Viability Assessment makes no definitive proposal in terms of the final percentage (either unit numbers or habitable rooms), and states that this is still subject to further negotiation with Richmond. The current proposals represent a 32% increase in unit numbers from the 2020 scheme and yet little or no increase in the offer of affordable units. The scheme thus contravenes both London Plan and Local Plan Policy at a time of greatest need for affordable homes.
- The affordable units are concentrated largely in one area in the west of the site which hardly promotes a truly integrated community.

Highways & Access

- Traffic generation and congestion is terrible around here – and I am thinking in particular of buses stuck in traffic. Hammersmith Bridge has no prospect of being fully re-opened for vehicles and bus services for many years. There is just one means of access/egress to the site which is already gridlocked and not just at peak times. The supporting reports and data simply do not reflect the actual conditions of severe congestion and poor air quality for children at Thompson House School and the proposed secondary school.
- Nor does this development show how it will relate to the development of the Homebase site, the Barnes Hospital site, and future redevelopment of the Kew Retail Park. How will local conditions be sustainable?
- Local bus and train services have also been reduced and although 106 Agreement funds are allocated for improved local bus services, TfL have confirmed there are no definitive plans. If there are to be fewer cars in the future – and I hope so – we have not got there yet and the only way of reducing cars is to have good reliable public transport which is not being promised.
- How Stantec can justifiably substantiate their proposed upgrading of the PTAL accessibility of the site given the above is implausible. (See Technical Note - Bespoke PTAL Calculation Summary - 01.07.22).
- The proposed location of the bus stops and pedestrian crossings on the Lower Richmond Road and Mortlake High St, together with the Mortlake Station level crossing, will create unbearable constraints to traffic movement especially at am-peak times with the concentrated arrival of 1250 school pupils/staff and other site generated traffic/deliveries.

Infrastructure,

- The scheme will very significantly increase the local population by around 2500 residents and yet there is little or no provision for increased Community, Health and Cultural Facilities. The employment uses and a student population of 1250 will simply add to these local infrastructure pressures.

Application B - New Secondary School

- There remains no justification for the need of the proposed new secondary school. Data produced almost 10 years ago to support this is invalid. Since then, we have experienced families moving out of London, drop in population statistics *and this is already feeding through to reductions in primary school place needs. Primary schools are short of funding because they have not got enough children at the moment*.
- The proposed school is still located on protected OOLTI green open space, sports fields which represent the largest open green space in Mortlake. Jubilee Gardens and Mortlake Green are the only other meaningful green open spaces in the area and are already highly pressured in use by the existing population, and in the case of Mortlake Green, by further recreational use by pupils of Thomson House Primary School.
- OOLTI re-provisioning is simply not achieved by the nine pocket-sized open spaces in the proposed scheme. The spaces simply do not re-provision in terms of quality, quantum or openness and thus contravene Policy.
- Two of the spaces are all hard surfaced in any case and the Richmond Design Review Panel has stressed a need for less hard surfaced space and more soft green.
- Furthermore, daylight-sunlight data now illustrates many of the open spaces are highly over-shadowed due to the increased building heights compared to the 2020 design proposals. This will be highly detrimental for the residents on the site.
- Finally, the school site is far too small for 1250 pupils and necessitated play areas on the roof. Following Covid experiences outdoor open space for children is especially precious both for health and well-being. The site's total area is just 30% of DfE guidelines for secondary schools of this pupil size. If the fenced off, All-weather sports pitch is in use then the remaining open area for the majority of the 1250 pupils is woefully inadequate.
- This is simply unacceptable and a vast under-provision which Richmond should not accept.

For these reasons alone both inter-linked applications should be refused

Yours sincerely,

