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5 January 2023

Dear Sirs

Planning Application 22/0900/OUT
Planning Application 22/0902/FUL

I wish to register my very strong objection to the above two named planning applications, each related to the redevelopment of the Stag Brewery site, Mortlake.

I understand that this latest set of consultations are primarily necessary because of scheme design changes required to comply with the latest building regulations, particularly the internal layouts of the buildings submitted in detail on the east of the site. Drawings, Reports and Design Codes have thus been updated/substituted, and certain Technical Reports have had addendum information added to substantiate the original planning applications lodged in March 2022

These proposals and, in particular, the latest changes do not address, however, any of the continuing **significant** failings of the applications. I refer to those now.

Both Applications

1. Density, Building Height & Scale of Development

The scheme now proposes 1071 residential units, a minor reduction of 14 from the March 2022 submission. It remains far too dense given the prevailing scale and density of the existing community, the sensitive riverside location, heritage context, and the severe and unique access constraints of this site. In particular:

- 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. They consequently overwhelm the character of the Thames bankside setting and dominate the locally protected Maltings building and adjacent heritage assets.
- An almost rural character prevails along the Thames from Putney/Hammersmith to Kew creating a green landscape corridor. The densely packed blocks combined with their height and scale will destroy this unique stretch of the River Thames.

- Those buildings above seven floors contravene not only 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.
- The reduction in height of Building 10 by one floor is welcome, although seemingly in doing so it reduces the number of Intermediate-Affordable residential units. This appears to symbolize that a central aim of this development is to maximise profit, not to provide the amenities which the community actually needs.

2. Affordable Housing

Despite the increase in residential units to 1071 from 813 in the earlier 2020 planning applications the affordable percentage remains exceedingly low at around 19% - 39 Intermediate units and 165 Social Rent.

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 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. I doubt it is being overly skeptical to suggest that eventually the proportion of affordable housing units will fall even further.

The developer quotes increased building costs and loss of income from reduced basement parking numbers and negative impact on unit sales as factors creating the low affordable offer. However, this is a highly attractive riverside location and Richmond remains one of the most desirable national boroughs generating strong take up and premium values. It seems incredible that a developer could not produce a profitable proposal even with the inclusion of a substantial amount of affordable housing. If they can't, maybe they are the wrong developer, or are simply being too greedy for a large profit.

Stepping back, though, is it really the Council's policy to support a large housing development comprising premium and expensive units which will be affordable only to wealthy people (and which, I suspect, will be London pieds-a-terre for many). I have two children in their 20s who are in the early stages of their careers and would love to be able to purchase their first homes in this area. Tell me I am wrong, but I suspect that these units will be way out of their affordability range, as they will be for essential local workers (teachers, health care workers, shop workers etc). I appreciate that there is a national housing shortfall and that increasing the stock of housing across the country should in principle reduce prices for all buyers, but is the Council really of the view that a development of this kind contributes to that? In other words, does the Council genuinely take the view that this area either in its own interests or for the benefit of the wider community really needs this housing?

One final point on affordable housing: the affordable units are concentrated largely in one area in the west of the site which hardly promotes a truly integrated community.

3. Infrastructure, Highways & Access

Traffic generation and congestion remain massive concerns and serious objections to these proposals. 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.

Local residents are experiencing huge delays in travelling out of the area by car due to ever-increasing congestion throughout the day, and equivalent delays on returning into Mortlake. My wife commutes from

Barnes to Marlow each week with driving the only viable option and the Lower Richmond Road the only viable route. If she leaves the house after 06.45 she faces being stuck in massive queues (and, incidentally, carrying the guilt of contributing to the air pollution in the immediate area). At certain times traffic queues extend back into Barnes.

This proposed development cannot be viewed in isolation. The development of the Homebase site, the Barnes Hospital site, and future redevelopment of the Kew Retail Park will make local conditions even more unsustainable.

The situation is obviously compounded by Hammersmith Bridge remaining closed to traffic with no prospect of it being fully re-opened for vehicular traffic and bus services for many years.

In the meantime, local bus and train services have been reduced and although 106 Agreement funds are allocated for improved local bus services, TfL have confirmed there are no definitive plans.

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*).

In addition under this heading, 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.

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.

Planning Application 22/0902/FUL - New Secondary School

School Place Needs, Siting and OOLTI

There remains no justification for the need of the proposed new secondary school. Data produced almost 10 years ago to support this is now 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.

I am a governor at two local primary schools and I see figures on primary school entry. One of the biggest concerns we as governors have is a reduction in pupil intake because that directly affects funding. Some schools are seeing this happen. Primary school numbers are dropping and that will inevitably feed through to secondary school pupil numbers. To build a new secondary school seems to me to be bizarre. If there is presently pressure on secondary school places then quick and temporary solutions must be found. Not building a new school which, would be available for use at a time when any short term pressures have gone and pupil demand is falling.

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.

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 each reasons alone both inter-linked applications should be refused. Taken as a whole they seem to me to amount to an unarguable basis for rejection.

Yours faithfully

A large black rectangular redaction box covering the signature of Darryl Evans.

Darryl Evans