Reference: FS478412807

# Comment on a planning application

### **Application Details**

Application: 22/0900/OUT

Address: The Stag BreweryLower Richmond RoadMortlakeLondonSW14 7ET

Proposal: Hybrid application to include:1. Demolition of existing buildings (except the Maltings and the façade of the Bottling Plant and former Hotel), walls, associated structures, site clearance and groundworks, to allow for the comprehensive phased redevelopment of the site:2. Detailed application for the works to the east side of Ship Lane which comprise:a. Alterations and extensions to existing buildings and erection of buildings varying in height from 3 to 9 storeys plus a basement of one to two storeys below ground to allow for residential apartments; flexible use floorspace for retail, financial and professional services, café/restaurant and drinking establishment uses, offices, non-residential institutions and community use and boathouse; Hotel / public house with accommodation; Cinema and Offices.b. New pedestrian, vehicle and cycle accesses and internal routes, and associated highway worksc. Provision of on-site cycle, vehicle and servicing parking at surface and basement leveld. Provision of public open space, amenity and play space and landscapinge. Flood defence and towpath worksf. Installation of plant and energy equipment3. Outline application, with all matters reserved for works to the west of Ship Lane which comprise:a. The erection of a single storey basement and buildings varying in height from 3 to 8 storeysb. Residential developmentc. Provision of on-site cycle, vehicle and servicing parkingd. Provision of public open space, amenity and play space and landscapinge. New pedestrian, vehicle and cycle accesses and internal routes, and associated highways works.

## **Comments Made By**

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#### Comments

**Type of comment:** Object to the proposal

Comment: Applications A & B

Density, Building Height & Scale of Development

The proposal of 1071 residential units is just a reduction of 14 from the Mar 2022 submission. This is still too dense given the prevailing scale and density of the existing community, the sensitive riverside location, heritage context, and the sites severe and unique access constraints – bounded by the river/railway to the north and south/east with Chalkers corner to the west.

Affordable Housing – 19% of units being affordable falls woefully short of the GLA target of 50% - not acceptable. 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). Why would the council therefore even consider this application at all?

The scale of the blocks will only produce residences which have restricted daylight/sunlight, overlooking and invasion of privacy. The development design is more for congested central city development than the green riverside suburban location.

The developers attempt to sell this scaling as creating a new heart of Mortlake. I suspect none of the developers have visited Mortlake!

## Infrastructure, Highways & Access

Traffic generation and congestion remain as major concerns/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. In fact the updated presentation on changes in numbers of vehicles turning at key junctions vs 2017 are falsely presented to state numbers have reduced therefore any

increase is acceptable (i.e. back to 2017 levels). The report fails to outline that the reductions are due to increased congestion – i.e. vehicles are sat for longer in queues and unable to make turns at junctions...so traffic has gotten worse. In reality - local residents are experiencing huge delays throughout the day and at weekends. Hammersmith bridge continues to impact this and with no foreseeable solution. The development will significantly increase personal and commercial traffic flow. In addition, local bus and train services have been reduced and although 106 Agreement funds are allocated for improved local bus services, TfL have confirmed 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).

#### Application B - New Secondary School School

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 yet Richmond Council fail to have their eyes open to this, nor willing to commission more up to date analysis. Since the initial data was run, 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. There is a greater demand to relocate the existing Thomson House school to this site – removing the high risk challenges of their existing locations (level crossing, air quality etc).

The site anyway is too cramped for a 1,200 pupil school – far below government requirements. The location will draw pupils from outside the borough, increasing traffic flow to the already congested status quo. In addition, the replacement of grass playing fields with an all weather surface, along with the reprovision of space across the broader development... is unacceptable and does not meet the local plans criteria on quality, quantum and openness. How the developers justify that kerbside greenery next to high rise flat development contributes to OOLTI reprovisioning is embarrassing. The Council must see through this façade.

Therefore, both inter-linked applications should be refused.